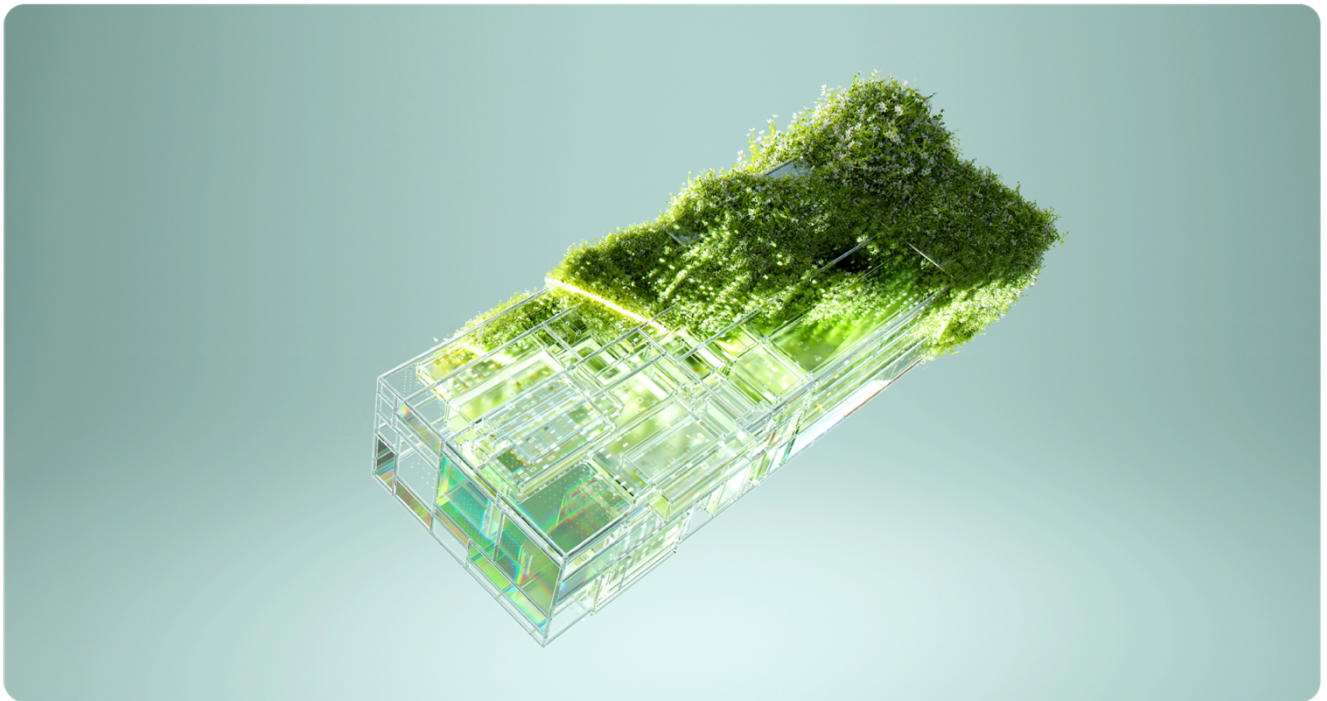


BDx Environment, Health & Safety (EHS) Policy



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Consultation Details

Name:	1. Sujit Panda 2. Vijay Tripathi 3. Amarjit Kaur 4. Agus Hartono Wijaya 5. Kurniawan Dwi Prasetyo 6. David Yiu 7. Shirley Ho 8. Jeffrey Lau 9. Kiran Dumpala 10. Mithila Mahajan 11. All Policy Management Committee (PMC) Members
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Feedback

Feedback or issues arising on implementation of this policy should be communicated to the policy author.

Policy Authors	1.	Sunil Sam Christopher
	2.	Mohamed Shuhail Bin Shamsuddin
	3.	Fahmi Arief Hakim
	4.	Jonnie Leung

TABLE OF CONTENTS

1.0	Introduction	5
2.0	Purpose	5
3.0	Scope	5
4.0	Principles	6
5.0	Definitions	7
6.0	Policy Statement	8
7.0	Limitation, Review and Amendment	10
8.0	Training	10
9.0	Related Documents	10
10.0	Date of Next Review	10

1.0 Introduction

BDx Data Centers (“BDx”) recognizes that protecting the environment and ensuring the health, safety, and well-being of all individuals associated with our operations are fundamental to sustainable business success. As a leading data center solutions provider operating across multiple geographies, BDx is committed to integrating environmental protection, occupational health, and safety into every level of its business activities.

This Group EHS Policy reflects our commitment to responsible corporate conduct and aligns with the principles of ISO 14001:2015 and ISO 45001:2018, ensuring the establishment, implementation, maintenance, and continual improvement of an effective EHS Management System across all BDx entities.

2.0 Purpose

The purpose of this policy is to:

- + Define BDx’s overarching commitments and expectations in relation to environmental protection, occupational health, and workplace safety.
- + Provide a common framework for establishing, implementing, and continually improving EHS performance across all BDx entities and Data Center operations.
- + Ensure that BDx’s business activities are conducted in a manner that prevents injuries, illnesses, pollution, and environmental degradation while promoting sustainable resource use.
- + Demonstrate leadership accountability and employee participation in achieving compliance, risk reduction, and operational excellence in EHS management.

3.0 Scope

This Group EHS Policy applies to:

- + All BDx business units, subsidiaries, and joint ventures where BDx has operational control or influence.
- + All individuals working for or on behalf of BDx, including employees, contractors, vendors, visitors, and partners.
- + All phases of BDx operations, including planning, design, construction, commissioning, operation, maintenance, and decommissioning of Data Centers.
- + The policy establishes a group-level framework under which local EHS policies, procedures, and guidelines shall be developed to meet applicable local legal requirements and specific operational conditions.

4.0 Principles

BDx's EHS commitments are guided by the following key principles:

Principle	Description
Leadership and Accountability	Senior management demonstrates visible leadership and accountability for EHS performance, ensuring that EHS objectives are integral to business planning and decision-making.
Legal and Regulatory Compliance	BDx complies with all applicable environmental, occupational health, and safety laws, regulations, and other requirements relevant to its operations.
Risk and Opportunity Management	We systematically identify, assess, and control EHS risks, while pursuing opportunities to enhance environmental performance and worker safety.
Pollution Prevention and Resource Efficiency	BDx actively promotes pollution prevention, energy efficiency, waste reduction, and responsible resource consumption in all operations.
Safe and Healthy Work Environment	We provide and maintain safe, healthy, and hygienic workplaces to prevent work-related injuries, illnesses, and incidents.
Employee Consultation and Participation	We foster open communication and consultation with employees and worker representatives to encourage participation in EHS decision-making and continuous improvement.
Competence and Awareness	We ensure that all employees and contractors are trained, competent, and aware of their EHS responsibilities and the potential impacts of their actions.
Continual Improvement	We regularly monitor, audit, and review our EHS Management System to evaluate performance, drive continual improvement, and adapt to evolving business and regulatory expectations.
Community and Stakeholder Responsibility	BDx is committed to operating responsibly within the communities where we work, minimizing adverse environmental impacts, and promoting positive contributions to sustainable development.

5.0 Definitions

For the purpose of this policy, the following definitions apply:

Term	Definition
Environment, Health & Safety (EHS)	A collective term referring to BDx's integrated approach to managing environmental protection, occupational health, and workplace safety across all operations.
Environment	Surroundings in which BDx operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelationships.
Occupational Health and Safety (OHS)	Conditions and factors that affect, or could affect, the health, safety, and well-being of employees, contractors, visitors, and other stakeholders in the workplace.
Hazard	A source, situation, or act with the potential to cause injury, ill health, damage to property, environmental harm, or a combination of these.
Risk	The combination of the likelihood of occurrence of a hazardous event and the severity of injury or ill health that can be caused by the event or exposure.
EHS Management System	The structured framework of policies, processes, and procedures developed in alignment with ISO 14001 and ISO 45001 to achieve BDx's EHS objectives and continual improvement.
Continual Improvement	A recurring process of enhancing the EHS Management System to achieve improvements in overall EHS performance consistent with BDx's policy and objectives.
Legal and Other Requirements	Applicable statutory regulations, international standards, industry best practices, and commitments that BDx subscribes to voluntarily or is required to comply with.
Stakeholders	Individuals or groups that can affect, be affected by, or perceive themselves to be affected by BDx's EHS performance, including employees, contractors, customers, regulators, shareholders, and the community.
Incident	An occurrence arising out of BDx operations that could or does result in injury, illness, damage, or other loss, including near misses.
Pollution Prevention	The use of processes, practices, materials, or energy that avoid, reduce, or control the creation, emission, or discharge of pollutants or waste to minimize environmental impact.

6.0 Policy Statement

BDx Group Environment, Health & Safety (EHS) Policy

6.1 Commitment

BDx Data Centers (“BDx”) is committed to providing safe, healthy, and hygienic working conditions to prevent work-related injuries and illnesses for our employees, customers, contractors, vendors, and visitors. We conduct our operations responsibly, with due regard for the environment and the communities in which we operate.

We integrate Environment, Health, and Safety (EHS) considerations into every aspect of our business and comply with all applicable legal and other requirements.

We are committed to minimizing our environmental footprint by managing energy use efficiently, reducing greenhouse gas emissions, and supporting actions that contribute to climate change mitigation and adaptation.

We are also committed to improving energy and water efficiency, adopting sustainable technologies, and minimizing resource consumption across all BDx Data Center operations.

6.2 EHS is a Core Strategic Pillar

EHS is fundamental to our business strategy and guides our decision-making and daily operations. Our systems and processes are designed to uphold the highest standards of safety and environmental stewardship.

6.3 Safety First

In line with our “Safety First” principle, we actively encourage employees to identify hazards, assess risks, and seek opportunities to improve our EHS Management System.

We empower all employees and the Occupational Health & Safety (OHS) team to stop any unsafe act or condition that poses an imminent and serious risk to life, health, or the environment without fear of repercussions.

6.4 Zero Tolerance for Negligence

A culture of zero tolerance toward safety negligence is deeply embedded at BDx Data Centers. We remain steadfast in this commitment. Any employee who compromises safety either their own or others' or fails to follow safety protocols will face disciplinary action, up to and including termination.

6.5 Objectives and Targets

We establish structured objectives and measurable targets to:

- + Prevent incidents and accidents that could harm people, assets, services, or the environment
- + Drive continuous improvement through adoption of leading EHS practices and risk mitigation measures
- + Ensure compliance with all applicable EHS laws and regulations
- + Promote environmental protection, pollution prevention, and efficient use of resources

- + Prevent pollution by reducing waste generation, promoting recycling, and ensuring responsible disposal of materials
- + Conduct our operations with respect for biodiversity and local ecosystems, taking measures to minimize any adverse environmental impacts arising from our activities or developments.
- + Foster a positive and proactive EHS mindset among employees and contractors
- + Enhance EHS awareness and competency through education and engagement

6.6 Implementation & Participation

We will achieve our EHS objectives by:

- + Engaging employees and worker representatives through consultation, participation in EHS committees, events, risk assessments, audits, and training
- + Defining clear EHS roles and responsibilities at all levels, and recognizing contributions to EHS goals
- + Allocating adequate resources to support EHS programs, initiatives, and continual improvement
- + Working with our suppliers, contractors, and partners to promote responsible sourcing and sustainable practices that align with BDx's EHS and ESG principles

6.7 Monitoring and Continuous Improvement

We regularly monitor and review our EHS performance through audits, inspections, and management reviews. EHS indicators form an integral part of our overall business performance evaluation.

Findings and feedback are addressed promptly to ensure continual improvement of our EHS Management System.

We engage transparently with our stakeholders on EHS and sustainability matters and report our performance in line with BDx's ESG commitments.

7.0 Limitation, Review and Amendment

In the event of any conflict between the provisions of this Policy and of the Applicable Law, the provisions of Applicable Law shall prevail over this Policy. Any subsequent amendment / modification to the Applicable Law shall automatically apply to this Policy.

The PMC Committee may review this Policy periodically and recommend amendments for the Board's approval from time to time, as may be deemed necessary.

8.0 Training

Training on this policy will be provided by the OHS Team.

9.0 Related Documents

- + ISO 14001:2015
- + ISO 45001:2018

10.0 Date of Next Review

11/01/2027