COMPASS datacenters®

OUTCOMES

Compass Datacenters 2025 Report



About This Report

This is Compass Datacenters' third annual disclosure report on environmental, social and corporate governance (ESG) topics. Produced by Compass' Executive Leadership Team with support from third-party climate consultant, Mantle Climate, this report has been prepared following the guidance of the Task Force on Climate-Related Financial Disclosures (TCFD), the Sustainability Accounting Standards Board (SASB) real estate standards and the Global Reporting Institute (GRI) Universal Standards. The data and metrics reflect results of the 2024 calendar year, with some 2025 initiatives. We aim to continue to improve our reporting in future years, following industry standards and frameworks.



Letter from our CEO

Partnering to Make Lives Better

It's hard to believe we're in year three of reporting on Compass' impact to the environment, the people we employ, the communities we serve and the way we run our business. Another year of opting to report because it's the right thing to do. And another year of measuring success by outcomes rather than optics.

Reflecting on 2024, I can confidently say it was one for the innovation record books. Those innovations are a direct result of having the most talented team in the business and deep-seated relationships with partners. I am thrilled for this opportunity to shine a light on progress made possible through partnership and the outcomes we were able to achieve together.

Compass has always been a little different when it comes to partners. Rather than a transactional engagement that seeks the lowest cost, we've fostered deep, collaborative relationships built on mutual trust and transparency. This philosophy, born from a commitment to stay curious, continuously improve and approach challenges from a place of humility, has allowed us to integrate the brightest minds from both sides – our internal teams and our partners – enabling us to constantly refine designs, improve processes and bring forward innovations to make lives better.

Over the past year, these closely coupled partnerships have brought about some pretty remarkable outcomes that I couldn't be prouder of. It's innovation done differently and shared widely. It's doing what's right for industry and society. We do what we do the right way because it's the right thing to do.

Explore the details on the following pages and enjoy this year's Outcomes Report.



Sincerely,

Chris Crosby

CEO, Compass Datacenters



Table of Contents

02 - About This Report

03 - Letter from our CEO

05 - What It Means to Partner

06 - ESG at Compass

07 - How We Operate

08 - Materiality

09 - 2024 Key Metrics and Progress

11 - Innovation

22 - Environment

38 - Social

58 - Governance

66 - Appendices



What It Means to Partner

One of the things that makes Compass truly unique is our approach to working with strategic partners. We have a truly collaborative approach to partnership that drives continuous improvements, innovations and efficiencies that align with our ESG objectives.

As you read this report, you will see numerous examples of how our collaborative approach has helped us achieve breakthroughs that benefit our employees, our customers and the communities we serve. Our strategic partners are carefully chosen because they align with Compass' culture, share our core convictions and believe in the power of collaboration as much as we do.

The result is a tightly-coupled supply chain that harnesses the expertise and creativity of Compass and our partners to accomplish big things that represent a new blueprint not only for the data center industry, but also for the construction and technology industries overall.

We have always believed that together we can accomplish much more than we can alone – a belief that has allowed us to achieve so much in 2024 that has significant positive ESG outcomes.



Schneider Electric Integration Facility at Compass' Red Oak, Texas campus.

ESG at Compass

Our four core convictions help drive our commitment to ESG:



Humility In, Pride Out

We are always learning, we prefer a “better or worse” versus a “right or wrong” mindset and we keep short accounts.



Actions and Words Are One

We do what we say we are going to do and we do not make a commitment that we cannot keep.



Continuous Improvement

Small incremental improvements over time produce outsized results, and we maintain the humility to know something can always be better.



We Ask “Why?”

We ask to understand needs versus wants - curiosity drives more efficient outcomes in the short term and disruptive innovation in the long-run.

At Compass, ESG isn’t a separate initiative – it’s how we operate. Sustainability isn’t just a goal for us – it’s an outcome. It’s the natural result of how we design, build, operate and deliver for our customers. We believe that doing the right thing is good business. And our commitment to continuous improvement drives us forward - from the materials we choose, to how we steward energy, water and community relationships. We believe that sustainability lives in our culture. It’s not a box to check. It’s a reflection of how we think, act and lead.

At Compass, we’re building a more sustainable and resilient digital infrastructure industry by:

- Embedding ESG into every phase of our design, delivery and operations
- Investing in our people and partners to innovate and make lives better
- Operating transparently and with integrity – because trust is our foundation
- Holding ourselves accountable to always do the right thing

Because at Compass continuous improvement isn’t a tagline - it’s our core conviction. We value action and continuous improvement over planning paralysis. We “do” rather than “talk.” Like with financial investments, we believe in a time-value approach to carbon. We think an avoided ton of CO_2 equivalent (tCO_2e) in 2024 is worth more than one avoided in 2034. We value sustainability planning, but only in parallel with action, not as its gatekeeper.

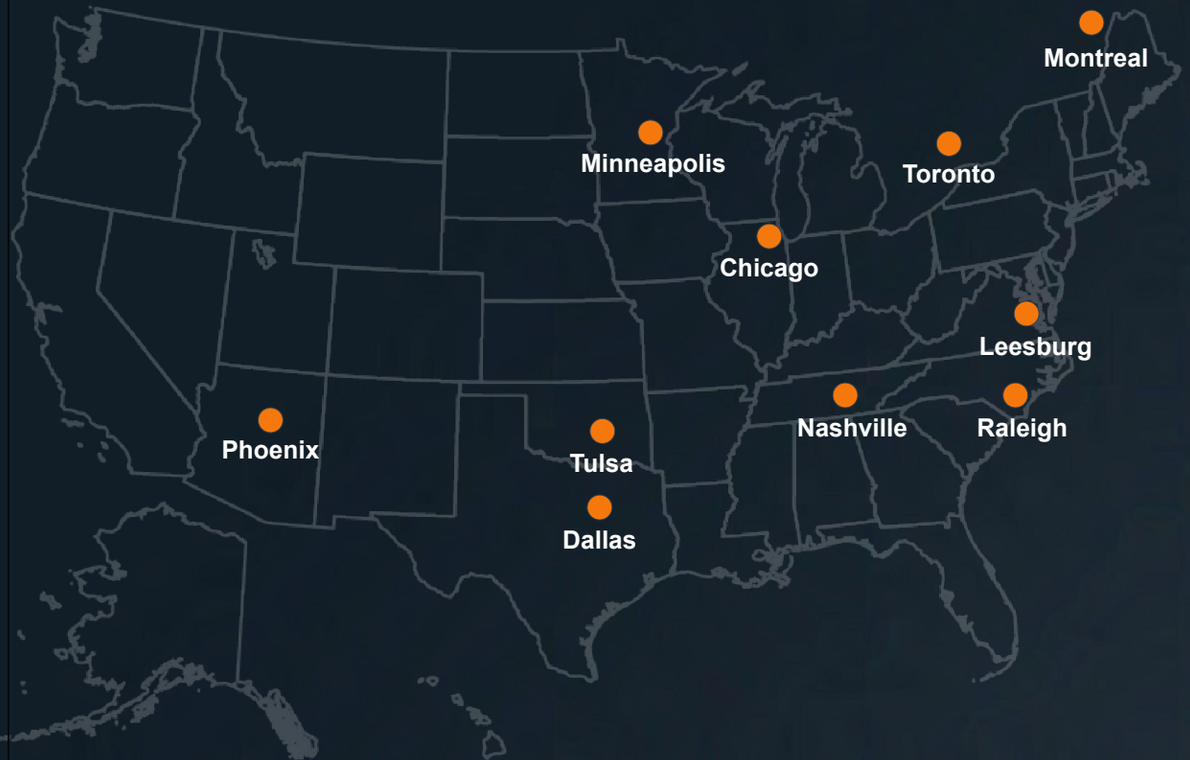
As a digital infrastructure leader, we are committed to sharing what we have learned, including both successes and failures. We are aligning our disclosures with the Task Force on Climate-Related Financial Disclosures (TCFD), Sustainability Accounting Standards Board (SASB) and Global Reporting Institute (GRI) standards. And we are aware of upcoming regulations like the Corporate Sustainability Reporting Directive (CSRD) and Energy Efficiency Directive (EED) in Europe to inform future disclosures.

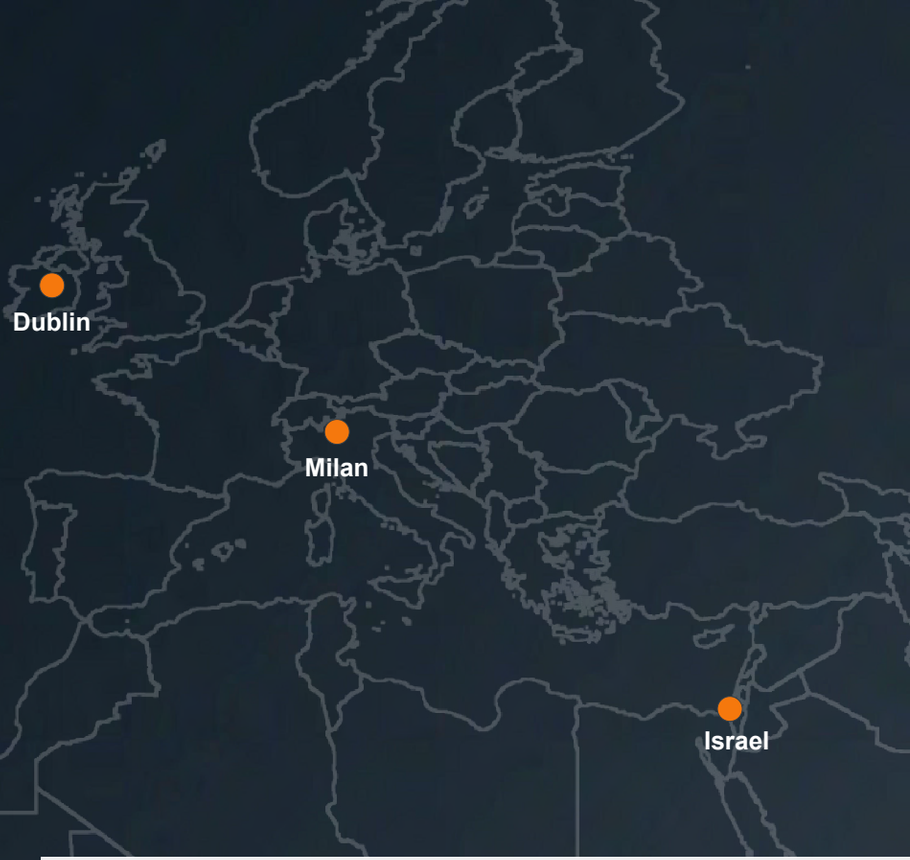
How We Operate

Our core business is data center development for the largest technology companies in the world.

Upon delivery of the campus, our customers take control of the activities that drive traditional scope 1 and 2 emissions. Their electricity emissions are our scope 3 emissions, allotted to category 13 (downstream leased assets). As a result, total scope 1 and 2 emissions represent only a small portion of the emissions generated at each of our sites.

A key enabler of our ESG outcomes is our approach to innovation and continuous improvement to reduce emissions through design, construction and procurement of materials and components. This is discussed in more detail in the Innovation and Environment sections.





Our Locations

United States

- Allen, TX
- Chicago, IL
- Dallas, TX
- Leesburg, VA
- Minneapolis, MN
- Nashville, TN
- Phoenix, AZ
- Raleigh, NC
- Tulsa, OK

Canada

- Montreal, QC
- Toronto, ON

Italy

- Milan, IT

Israel

- Tel Aviv, IL

Corporate

- Dallas, TX
- Dublin, IE
- Toronto, ON

Materiality

We recognize that materiality today is multidimensional – encompassing not just how ESG factors affect our business, but how our business impacts people, communities and the environment. This dual lens, known as double materiality, is increasingly essential for building long-term value and trust.

In 2022, we partnered with Schneider Electric to conduct a comprehensive materiality assessment aligned with leading ESG frameworks and rating systems, including SASB, Sustainalytics and S&P Global Ratings. Through this collaborative effort, we initially identified 43 potentially material topics. Of these, 42 were confirmed as relevant to the data center industry and were included in a broad stakeholder survey.

The survey involved Compass' Executive Leadership Team, employees, suppliers, peers and ESG rating and ranking agencies. The result was a stacked materiality ranking, highlighting those topics most critical to our stakeholders and strategic direction.

The Top 7

01. Emissions
02. Diversity
03. Employee Health and Safety
04. Energy
05. Business Ethics and Integrity
06. Materials Sourcing and Efficiency
07. Water and Wastewater

Based on this, our leadership team prioritized action on the top seven validated topics, which stood out as significantly more material than the remaining set. These seven form the foundation of our near-term ESG strategy.

We operate in a rapidly evolving space. Our materiality list is therefore not static but is regularly reassessed to reflect changing priorities and more ambitious goals. We remain committed to tracking and addressing all material topics over time and will revisit and refine our materiality priorities through regular reassessment and transparent reporting.

This year, we began a trial incorporating industry-leading ISO 14001 guidelines for a materiality assessment at one of our sites. This environmental management standard includes robust processes for identifying material aspects and responding to them in a transparent fashion. We have drawn on key ideas from this standard to enhance our existing materiality practices, including ongoing evaluation of Compass' materiality to ensure they are monitored and improved over time. We focus on the most significant environmental risks and consider the expectations of interested parties.



2024 Key Metrics and Progress

0 WUE

water usage effectiveness from IT cooling attributed to closed-loop water systems and being zero water from inception for IT loads

2483 hours

of training for ABC, HSSE, and cybersecurity

First Green Globes certification

at PHX campus, with two Green Globes

1.25 PUE

annualized design-average power use effectiveness

84%

of US construction managers are female

Best Places to Work

earned an A in the annual workplace survey with a score of 90.37/100

Zero Waste to Landfill Validation

from UL Solutions at YYZ I and II

0.68 TRIR

total recordable incident rate (workplace safety)

17

awards and recognitions in 2024

Climate Risk Assessment

completed portfolio-wide

100%

uptime in 2024

5 First-of-Kinds

Began co-development on 5 first-of-kind prefabricated assemblies with our closely coupled partners

INNOVATION





Innovation

At Compass, innovation drives the outcomes that make us different. That's why we have reframed this annual report to the Outcomes Report to better capture the innovations we employ that lead to business outcomes, including ESG outcomes now and in the future.

We pride ourselves on being accountable by nature. Recognizing our intended and actual outcomes of doing the right thing drives our innovative initiatives. Many of the innovations and initiatives described in this section were designed and planned in 2024, with expected outcomes in future years. We intend to track our progress toward these outcomes in future Outcomes Reports.

We pursue innovations because they make business sense – they help us achieve better performance in our buildings and operations, including lowering carbon intensity. These achievements align with our Innovation Impact Areas, which are outlined below and represented throughout this report by their corresponding icons.

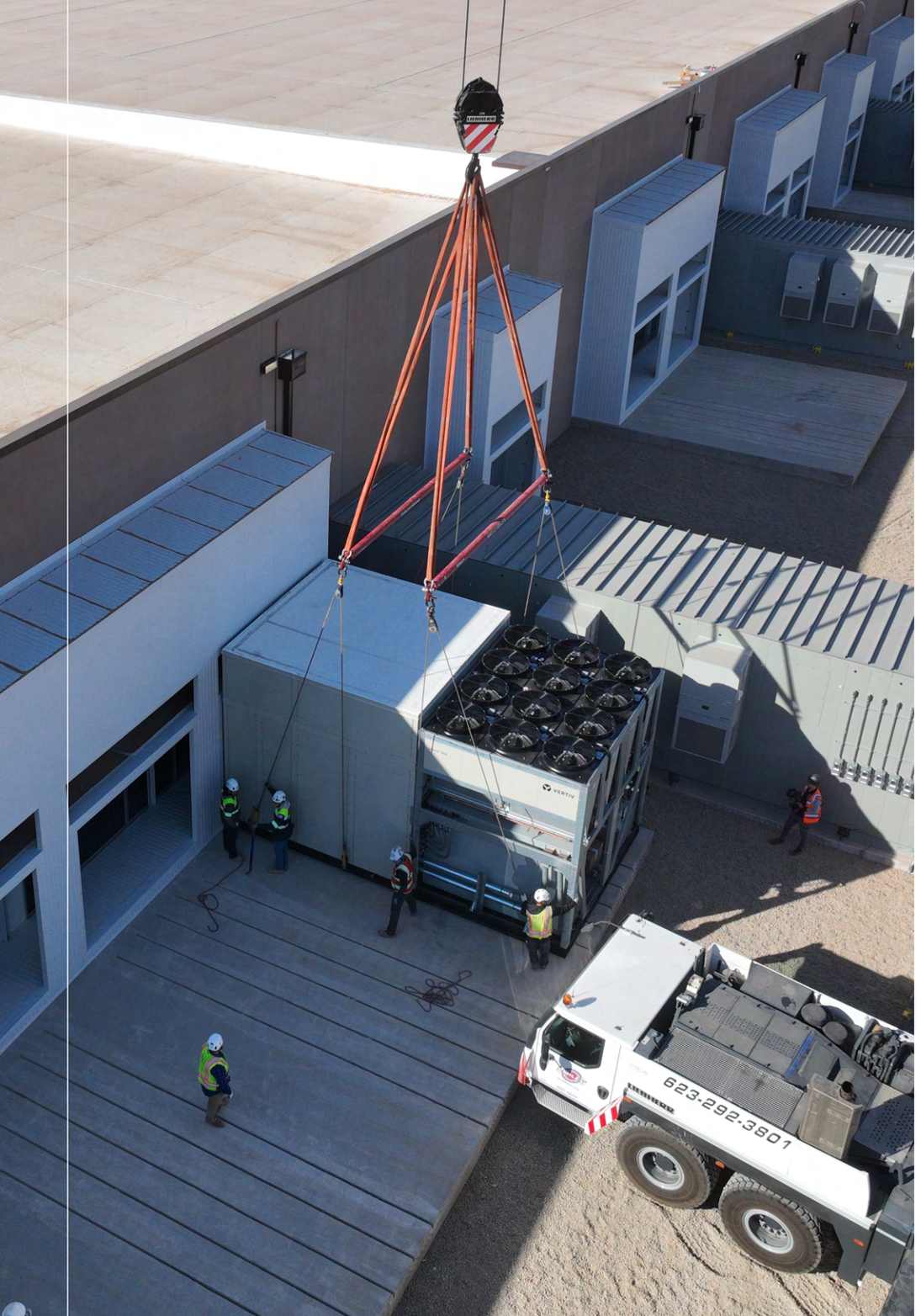
- (P) **Product selection:** Replacing traditional materials with innovative materials that are built to last and that deliver superior total cost of ownership (TCO). These include materials that are designed to have longer lives and greater resilience. These also include materials that deliver significant workflow efficiencies such as fiber-reinforced concrete rather than traditional rebar.
- (D) **Design decisions:** Continuously innovating design enhancements that align with our commitment to data centers that are fastest to ready, built to last and designed to deliver the lowest TCO.
- (T) **Use of technology**: Leveraging technology and principles like *poka-yoke* to continuously drive improvements and efficiencies through the use of predictive maintenance, production capture technologies, safety innovations, science- and AI-driven enhancements and more.
- (M) **Means and methods:** Adopting innovative construction processes like offsite manufacturing, industrialized assembly best practices, outcome-based methodologies to build facilities that align with our strategic anchors of fastest to ready, lowest TCO and built to last.

(E) (S) (G)

We're partnering and improving collaboration internally and with external partners to better realize the ESG benefits of our innovations. The possibilities of these innovations and their outcomes have only been unlocked because of how closely coupled our partnerships are. We continuously explore how we can further deepen our partnerships to achieve more positive outcomes across environmental, social and governance metrics.



Where appropriate, we replace steel rebar with polymer fibers for structural reinforcement, reducing embodied carbon and increasing safety by eliminating the need for the rebar trade.



Efficient Logistics through Lean Manufacturing: Partnership with MEI Industrialized Solutions

E S G M

This year, we strengthened our material management by partnering with MEI to better track and dispose of materials. This was backed by creating a dedicated team to enhance our supply chain practices. Instead of having multiple stop-points and parties between the factory and construction site, we have streamlined our supply chain so that MEI is in charge from beginning to end. By maturing this part of our business, we have increased efficiency, reduced truck traffic and associated emissions, increased safety through more standardized practices and reduced transactional waste that might otherwise be produced through disconnect between handoffs. Partnering with MEI so closely has meant that we can learn lessons alongside a single partner who knows us well and who we can work collaboratively with to ensure solutions are implemented in a way that makes sense for us. This effort was driven by the principles of the *8 Forms of Waste in Lean Manufacturing*.

This innovative approach to efficient logistics has already led to positive outcomes. For example, we are optimizing crane use to eliminate the time a crane sits onsite unused. Through continuous, incremental improvement, we expect this kind of innovative work to continue to optimize our material management and supply chain practices.

"What makes this partnership so effective is the alignment of our core values. Both MEI and Compass are deeply committed to continuous improvement, sustainability and safety. By working together as one integrated team, we've deployed a supply chain model that not only improves efficiency and reduces waste, but also enhances safety through more consistent, standardized practices across every phase of delivery."

- Doug Dayton, CEO
MEI Industrial Solutions

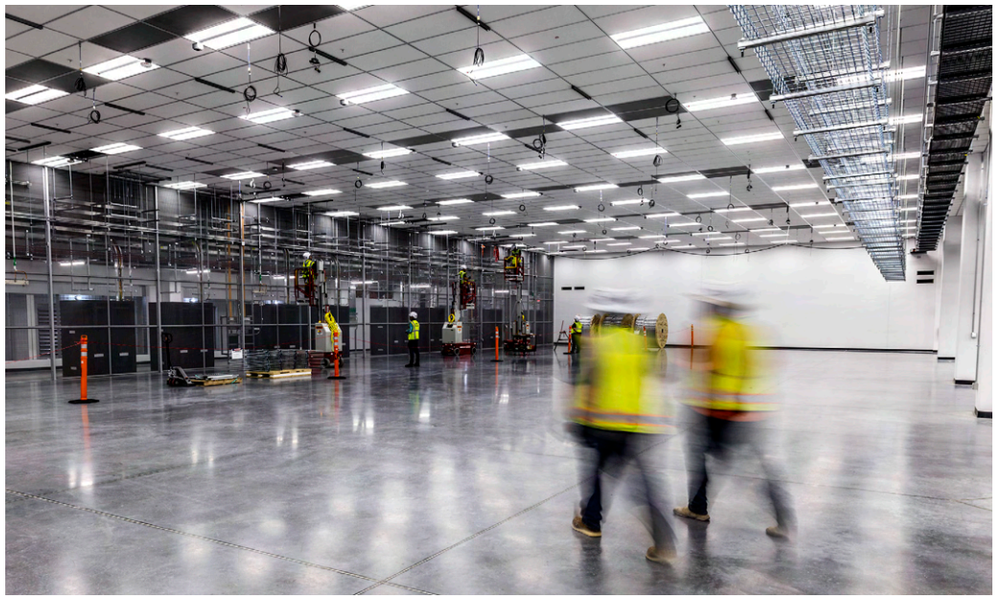
Efficient Logistics through Lean Manufacturing: Partnership with Tate Inc

E M

Through our partnership with a single manufacturer for ceiling solutions, we are able to experience and solve a problem just once. This partnership model follows our core conviction of continuous improvement and allows for constant forward motion. Our partnership with Tate is a prime example of this, where we optimized our ceiling grids based on lessons learned at our DFW campus.

"We greatly value our partnership because direct communication and forecasting allows us to plan, innovate and deliver at the highest level."

- Daniel Kennedy, Global President
Cloud Solutions & Innovation, Tate Inc



Digital Pre-Commissioning: Partnerships with Schneider Electric and Vertiv

E S G M

Our individual partnerships with Schneider Electric and Vertiv have empowered us to explore integrating our industrialized construction approach into our commissioning practices. With these partners, we are researching and developing a pre-commissioning system that moves large portions of onsite commissioning activities upstream to the factory. This will lead to many outcomes including reduced work hours onsite, reduced number of people onsite and increased worker safety.





Vertiv™ CoolPhase Flex: Partnership with Vertiv

E D P T

This year, we worked closely with Vertiv to develop the Vertiv™ CoolPhase Flex – a hybrid liquid cooling unit that allows for both liquid and air-cooling capabilities. In doing so, we incorporated our pre-commissioning efforts and ensured more components were completed upstream, such as common component tests. We completed research, development, creation and factory witness testing this year, which has set us up for delivery of these cooling units in 2025. This collaboration has led to positive outcomes for both Compass and Vertiv. For Compass, the Vertiv™ CoolPhase Flex allows us to eliminate water use in cooling while achieving power usage efficiencies (PUEs) below the industry average. Simultaneously, Vertiv now has a new optimized product to market to other clients, creating positive outcomes for the industry at large. It's a testament to what closely coupled partnerships at Compass can unlock.

Built to Last with Plastic Piping

E P

We continue to use plastic piping for liquid cooling and stormwater management instead of traditional steel or concrete. Our high-density polyethylene material is more durable and has less embodied carbon than traditional reinforced concrete pipes for storm water and steel pipe for liquid cooling. This is the outcome of internal partnerships between our design and delivery teams who identified the need to strengthen the lifecycle of our piping alongside opportunities for better environmental outcomes.

Water Misting System at PHX Campus

E P M

This year, we beta tested a water misting system to be piloted at our PHX campus. Continuously increasing temperatures in Arizona create additional strain on mechanical and electrical systems. A water misting system can help lower the micro-climate temperatures around HVAC units to optimize performance and extend their lifecycle.

The misting system pilot successfully demonstrated its ability to reduce ambient intake temperature by 15°F to 20°F. This achievement has positive implications for cooling unit efficiency and energy savings. Once this system is implemented, we expect a reduction in annualized PUE of ~0.04 to 0.06.



DfMA Assemblies

E S G D M P

We worked with our supply chain and manufacturing partners to develop products aligned with our Design for Manufacturing Assembly (DfMA) approach for ease of manufacturing and ease of assembly. By decoupling conventional construction and striving for DfMA, we have accelerated installation methodologies aligning with our Strategic Anchor of Fastest-to-Ready. Our fungible components are part of a standard kit of parts and are future-proofed, making it easier for us to evolve our prototype data center and adapt to known and unknown changes.

Using a manufacturing mindset and enabling scale with our closely coupled partners gives Compass and our partners unique capabilities and advantages including:

- Joint innovation and R&D efforts
- New and innovative business models
- Shared risk and reward mindset
- Transparency, certainty and predictability for products and projects
- Embedded, connected technology in our products, assemblies, buildings and campuses
- Higher return on investment for Compass, our investors and our supply chain partners
- Faster schedules and accelerated deployment for customers
- Reduced waste throughout the lifecycle of our campuses
- Increased efficiency onsite with accelerated assembly
- Built-to-last quality with our 100-Year Campus approach as the driver
- Quickest response to changes and needs due to the successful collaborative systems approach to construction and operations

We worked with our industrialized construction partners including Schneider Electric, Vertiv, Siemens, Coreslab, Shockey and Wells/Gate to quantify the ESG outcomes of our DfMA work across power systems, cooling systems and structural precast. This kind of study has not been done before, so it has been important to us to lead the way in identifying the benefits of industrialized construction in this way. The findings show how intentional, deeply coupled partnerships with scale help us build a more sustainable and safe future. These evidence-based findings are unprecedented in our industry. Some highlights include:



Schneider Electric:

Schneider Electric assembles our modular power centers at offsite integration facilities compared with build out of internal electrical / UPS rooms.

- 89% reduction in onsite labor hours per MW
- 70% fewer workers onsite
- Lead time for switchgear is reduced from 62 to 32 weeks
- 15.3 million ton-miles avoided by relocating the integration facility to our DFW campus
- 315 metrics tons of CO_2e avoided annually from manufacturing efficiencies



Vertiv:

Vertiv manufactures our packaged air-cooling system, the Liebert DP400. Final integration of components onto a skidded, enclosed unit happens in a factory compared with traditional split systems installed at the jobsite.

- 98% of jobsite installation work is eliminated by prefabricating packaged cooling systems in a factory
- 85% faster assembly, transport, install and commissioning than site install
- 117,227 tCO_2e avoided from Liebert DP400 efficiency over its lifespan
- Reduced potential for refrigerant leakage



Coreslab, Shockey and Wells/Gate:

We assemble the structure and shell of our data centers from precast concrete, compared with errected steel structures with site-cast tilt-up panels, to dramatically increase our speed of delivery and maximize ESG outcomes.

- 33% embodied emissions from concrete and steel are avoided in structural and architectural applications with a commitment to precast and prefabricated building systems
- Reduced emissions from material transportation
- Reduced material waste through reclamation and reuse practices

In 2024, we researched and developed five first-of-its-kind prefabricated assemblies with our partners for deployment. As these are implemented, we will aim to quantify the benefit of these outcomes and others holistically.

Water Treatment Skids in Partnership with RK Industries:

This assembly ensures we are always prepared for the water treatment requirements of our liquid cooling option. This closed-loop system reduces water consumption and replaces traditional refrigerants with a much lower emission coolant. This is part of the flexible at-all-times cooling options of our hybrid cooling system. These skids also include water sensors for data collection, management and optimization.

Whitespace Module Through Partnerships with Schneider Electric and Vertiv:

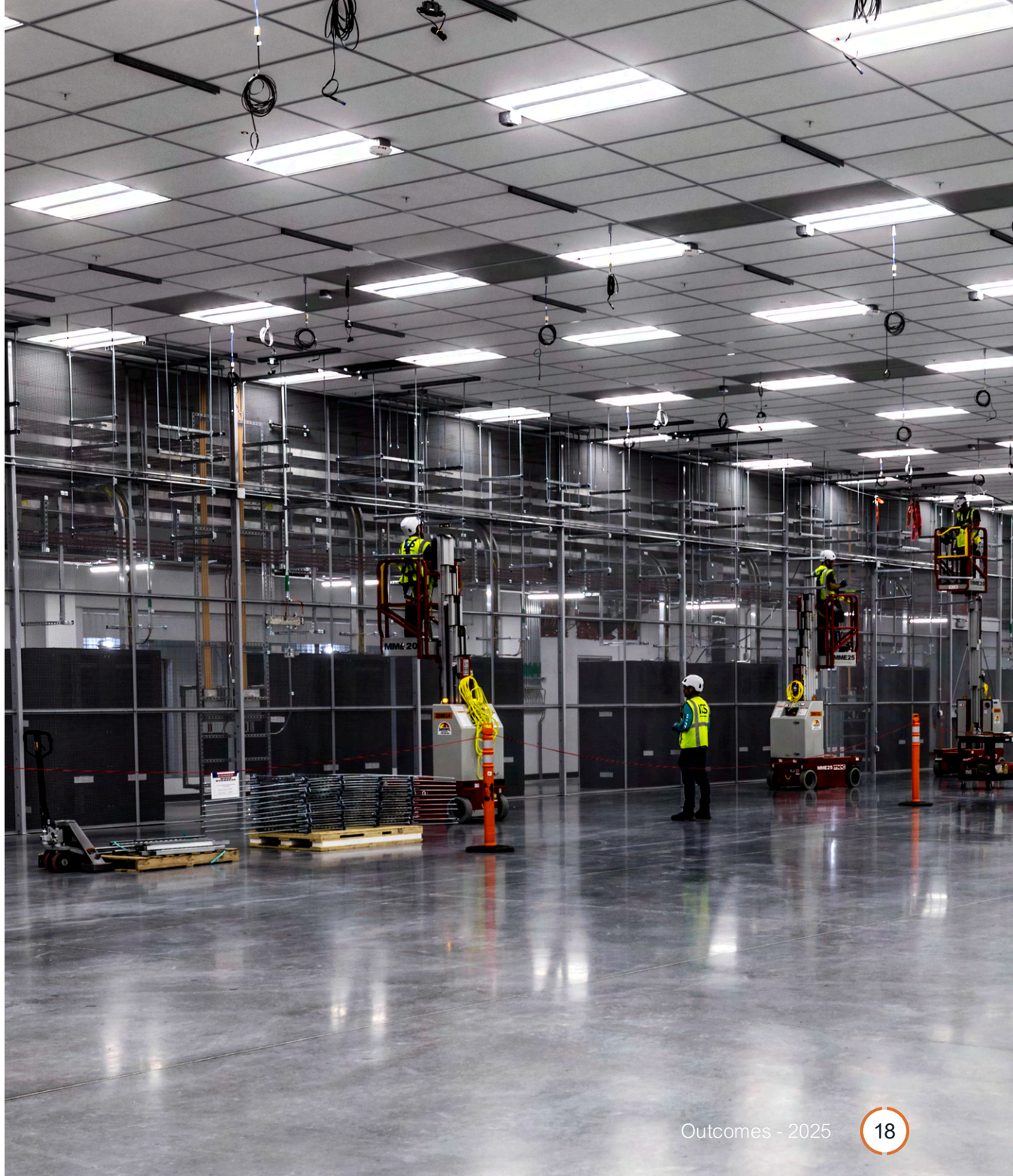
Our customers have the option to choose between different whitespace module assemblies, depending on their unique needs. We worked with Schneider Electric and Vertiv to co-develop these assembly options for our customers to enable hybrid air and liquid cooled racks.

Pipe Racks in Partnership with RK Industries:

Our two pipe rack assemblies for our facility water system (FWS) and technology cooling system (TCS) are designed to support our customizable hybrid liquid cooling, allowing maximum flexibility for our customers. They are in both the service corridors and in the white space.

Medium Voltage Skid in Partnership with Siemens:

This assembly pulls together all the components of a distribution network into a single modular skid solution. We focused on developing a product that will last and enable a safe, easy-to-install assembly that accelerates ready-for-service.



100-Year Campus Approach

E S G M

Our unique approach to delivering single-tenant campuses for hyperscale customers reflects our commitment to fostering closely coupled partnerships to allow for continuous improvement and investment in R&D to grow responsibly. We believe that a long-lived, large-scale campus is the most responsible and effective way to serve the future needs of our customers and the data economy. This programmatic Campus Approach is incorporated into our prototype design. It unlocks many ESG outcomes, including efficiencies across the board, aligned and streamlined processes for employees and built-in systems for accountability and improvement. Our 100-Year Campus model builds adaptability into every layer of our business and buildings. We ensure today's capacity remains live while tomorrow's compute needs come online.

Predictive Analytics

S M

By collaborating with two of our closely coupled partners, Schneider Electric and Vertiv, we planned and designed a predictive analytics system. The system extends building component lifespans and eliminates unnecessary maintenance that would otherwise increase risk and reduce employee safety. This sets us up for many positive outcomes in 2025 as this system is deployed, including only needing to fix what needs to be fixed.





ESG Data Mart

G M

We completed building out our ESG data platform – the ESG data mart – to enable more thorough, transparent and automated data collection and reporting. This has allowed for greater transparency and consistency of data to meet customer needs and unlock opportunities for further innovative outcomes. Through this data backbone, it enables us to measure emissions intensity, benchmark performance and focus on outcomes instead of inputs. The ESG data mart has already led to great outcomes, enabling improved data collection for this year's greenhouse gas (GHG) inventory.

Install Guides: Kit-of-Parts

S G M

As part of a simpler and accelerated assembly process, we developed highly visual Install Guides for our unique prefabricated assemblies. This initiative is collaborative with our manufacturing, fabrication and installation partnerships and effort to ensure ease of manufacturing and ease assembly. These visual-first, modular construction guides are engineered for ease of use by general contractors, enhancing quality and safety and reducing on-site risk. This standardized, component-based method ensures seamless integration across our supply chain, from factory manufacturing to installation and final operations.

ENVIRONMENT





Environment

As demand for data accelerates, so does the responsibility to build infrastructure that is future-ready, built-to-last and environmentally sound. At Compass, we recognize that meeting this challenge requires not just innovation, but collaboration. From day one, we have partnered with customers, suppliers and sustainability experts to design and deliver data centers that are built to last and built responsibly.

The stakes are high. A shortfall in data center capacity could slow progress in AI, cloud computing and digital infrastructure, posing risks to national security, global competitiveness and economic growth. That's why we view environmental stewardship as inseparable from our mission to support the digital economy.

Through close collaboration with our partners, we are advancing solutions that balance performance with sustainability. We believe that expanding data capacity and protecting the environment are not competing goals, they're interconnected imperatives. Our commitment includes:

- Collaborating with our closely coupled partners to drive emissions reduction in the design and construction and operations of our facilities
- Enabling the most efficient, low-cost and low-carbon operational environment for our customers
- Engaging with our customers and communities to deeply understand and achieve positive climate and social outcomes
- Partnering internally to streamline ESG goals and outcomes with processes, programs and delivery

Our industry-leading approach leverages our partnerships to explore innovative opportunities. This includes focusing on embodied carbon and avoided emissions, green building certification, working with local communities and more to consider our impact now and in the future.

Our Strategy for Emissions Reductions and Avoided Emissions

At Compass, we recognize the environmental impact of digital infrastructure and the urgency of responding with meaningful action. That is why we continue to prioritize product leadership, innovation and lifecycle performance as core drivers of lifecycle emissions reductions. We focus on what matters most – reducing emissions at the source and designing data centers with longevity and efficiency in mind. By comparing material systems, design modifications and industrialized construction techniques, we gained new insight into how early-stage decisions deliver avoided emissions and other environmental benefits over a building's lifetime. We continue to align our strategy with the principle of the time value of carbon: the earlier we reduce emissions, the greater the benefit to climate stability.

We are built to last. By developing durable, high-performance data centers that use less carbon-intensive materials and reduce the need for premature replacement or retrofits, we are not only lowering our footprint – we're building resilience into the digital infrastructure our communities rely on.

Building on our 2023 foundation, we will continue to refine our carbon accounting practices, invest in low-carbon materials and expand the use of whole-building lifecycle assessments (LCAs) across all major new builds. Our goal remains clear: deliver industry-leading data center performance while minimizing impact and maximizing emissions savings across the value chain.

Our Priorities

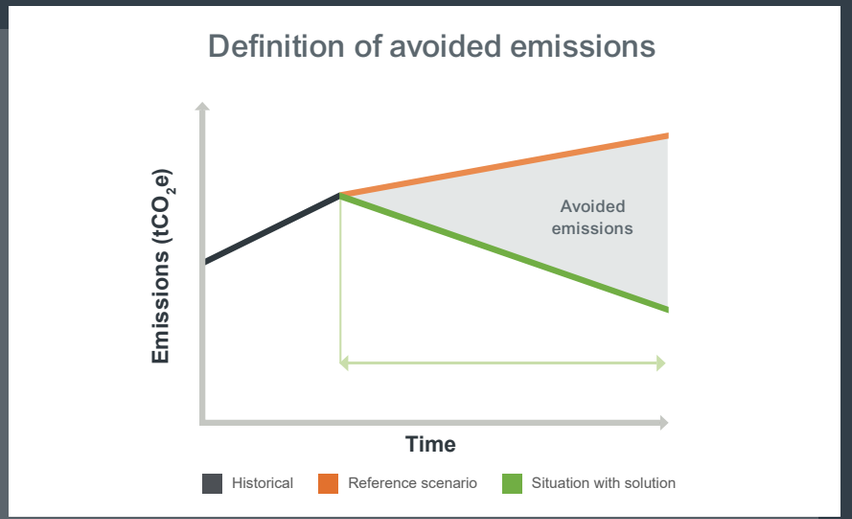
- Strengthen customer and supplier partnerships to reduce emissions and environmental impact
- Continue to strengthen our data collection and quality
- Continue achieving green building certifications
- Develop processes for improved Environmental Management Systems
- More deeply evaluate our physical climate risk

Definition: Avoided Emissions

The World Business Council for Sustainable Development (WBCSD) defines avoided emissions as "the positive impact on society when comparing the greenhouse gas (GHG) impact of a solution to an alternative reference scenario where the solution would not be used."

They distinguish scope 3 reductions from avoided emissions with the following: Pursuing a reduction of scope 3 emissions will incentivize a company's decarbonization of its portfolio when compared to previous years. Whereas pursuing the maximization of avoided emissions will incentivize a company to accelerate its contribution to the decarbonization of society through the addition of an increasing number of decarbonizing solutions in its portfolio and prioritizing markets that need to be decarbonized most.

Driving avoided emissions goes beyond measuring and reducing scopes 1-3. It requires us to think bigger, to innovate and scale decarbonized products and services for the betterment of society.



Advancing through Partnerships

We can't aim to make lives better without also reducing our environmental impact, and we know we can't do it alone. Our ability and willingness to form deep, strategic partnerships are a core strength that sets Compass apart. Whether collaborating internally or with suppliers, customers or local communities, we focus on reducing our carbon footprint through collaborative innovation.

A key part of this strategy is our emphasis on reducing emissions intensity through offsite manufacturing means and methods, which allow us to improve efficiency, minimize waste and scale responsibly. This approach, combined with our long-term R&D partnerships, gives us the runway to continuously improve performance over years, not just quarters.

In addition to our internal and supply chain partnerships, we actively participate with and influence outcomes of industry organizations such as iMasons, Green Building Initiative (GBI), Industrialized Construction Group (ICG) and Global Real Estate Sustainability Benchmark (GRESB). These partnerships allow us to challenge the status quo, reshape how the industry measures performance and demonstrate that doing things differently can deliver better environmental outcomes as a natural by-product.

Guided by our Innovation Impact Areas and supported by robust data, we're proving that sustainable growth and bold innovation can, and must, go hand in hand.



More than 70% of our data centers are prefabricated off-site, ensuring quality, consistency and safer work conditions.

Understanding ESG Possibilities through Partnerships

We are advancing our environmental performance through the industrialization of construction and the development of strategic supplier partnerships. We collaborated with key suppliers, including Schneider Electric, Vertiv, Coreslab, Shockey and Wells/Gate to study the environmental, human and operational impacts of industrialized construction across power systems, cooling systems and structural precast. This kind of analysis hasn't been done before, so we're paving the way to identify the benefits of industrialized construction in this way. Refer to the Innovation section to read more about the intended benefits of our DfMA approach and work.



Vertiv

- 117,227 tCO_2e avoided from the lifetime efficiency of the Liebert DP400 system
- Reduced potential for refrigerant leakage

Key Environmental Outcomes of Industrialized Construction & Partnerships Approach



Schneider Electric

- 15.3 million ton-miles avoided by relocating the Schneider power center integration facility to our DFW campus
- 315 metrics tons of CO_2e avoided annually from manufacturing efficiencies



Coreslab, Shockey and Wells/Gate

- 33% embodied emissions from concrete and steel are avoided in structural and architectural applications with a commitment to precast and prefabricated building systems
- Reduced emissions from material transportation
- Reduced material waste through reclamation and reuse practices

Industrialized Construction with Closely Coupled Partners enables Environmental Outcomes

At Compass, our approach is rooted in our deeply coupled partnerships. This year, three important initiatives emerged from our efforts to foster meaningful collaboration – initiatives that not only push the boundaries of operational efficiency and technology, but also improve outcomes for our customers, our partners and the planet.

Schneider Electric Partnership: Integration Facility Optimization

Our long-standing partnership with Schneider Electric took a bold step forward with the launch of the Integration Facility. Together, we're rethinking how modularization and prefabrication can reduce waste, reduce transportation emissions, streamline deployment, increase worker efficiency and safety and improve consistency across data center builds. From designing the facility itself, to refining the end-to-end build process, this partnership is helping set a new industry standard for scalable, prefabricated, efficient infrastructure and construction processes.

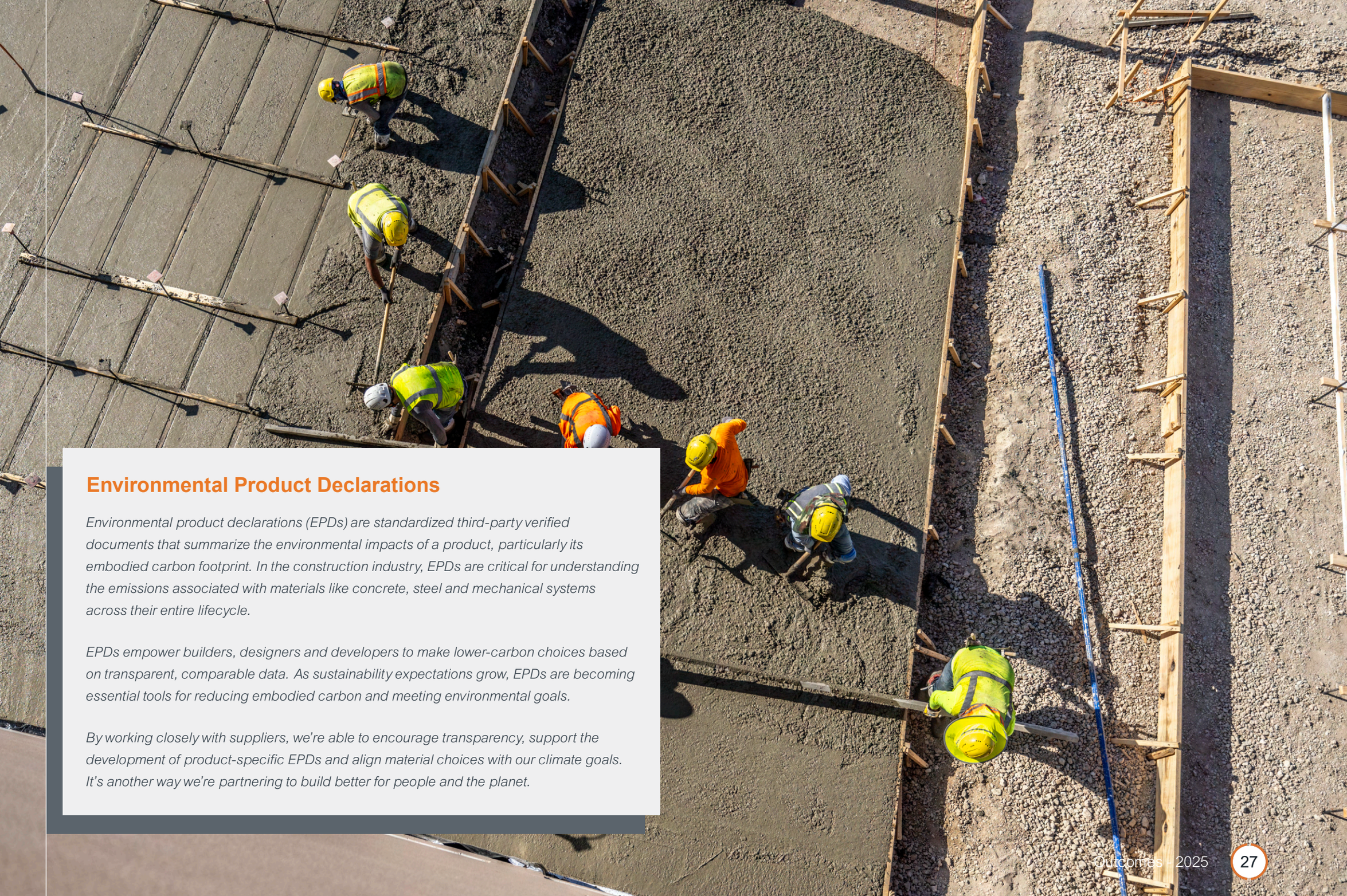
Siemens Partnership: Medium Voltage Skid

This year, we initiated a partnership with Siemens to co-develop a standardized medium voltage skid - a critical assembly in our power infrastructure. This solution was created as part of our DfMA approach, which emphasizes repeatability, efficiency and scalability in our construction methods. The collaboration has enabled faster deployment timelines, reduced on-site labor and improved safety all while enhancing quality control through offsite fabrication. From an ESG perspective, this approach reduces construction-related emissions, minimizes material waste and improves worker health and safety by limiting field exposure to high-voltage equipment.

Vertiv Partnership: Vertiv™ CoolPhase Flex Co-Development

In a collaborative effort to improve energy efficiency in cooling systems, Compass and Vertiv co-developed the Vertiv™ CoolPhase Flex: an innovative hybrid cooling solution. This new design was completed in October and enables Compass to meet the cooling needs of a wide variety of customers' needs, including for AI applications. It's a best-in-class environmental and cooling performance system with upstream efficiencies focused on environmental stewardship alongside operational energy savings. For instance, we're working with Vertiv to develop some of the first environmental product declarations (EPDs) for mechanical, electrical and plumbing (MEP) systems. This partnership has been mutually beneficial, allowing Vertiv to productize and scale the solution industry-wide. It's a win-win: advancing both companies' climate goals while bringing high-performance cooling to the broader market.





Environmental Product Declarations

Environmental product declarations (EPDs) are standardized third-party verified documents that summarize the environmental impacts of a product, particularly its embodied carbon footprint. In the construction industry, EPDs are critical for understanding the emissions associated with materials like concrete, steel and mechanical systems across their entire lifecycle.

EPDs empower builders, designers and developers to make lower-carbon choices based on transparent, comparable data. As sustainability expectations grow, EPDs are becoming essential tools for reducing embodied carbon and meeting environmental goals.

By working closely with suppliers, we're able to encourage transparency, support the development of product-specific EPDs and align material choices with our climate goals. It's another way we're partnering to build better for people and the planet.



Co-development of Campus Approval Certification with GBI

Data centers have unique sustainability challenges with very few green certifications that are designed specifically to address these challenges. We worked with the Green Building Initiative (GBI) to develop its new Green Globes Data Center Campus Certification. This program will address the unique sustainability challenges of large-scale digital infrastructure and streamline the assessment of multiple buildings within a data center campus, allowing operators to evaluate redundant systems and interconnected infrastructure holistically. The initiative aims to enhance environmental performance, meet evolving stakeholder expectations and support long-term resilience in the face of growing energy demands. This certification program was launched in early 2025.

Green Globes

Green Globes certifications are issued by the Green Building Initiative, an international nonprofit organization dedicated to improving the environmental performance of buildings. The certification process evaluates multiple dimensions of sustainability, including ESG management, site use, energy, water, materials and indoor environmental quality. We are proud to have received our first certification this year at our Phoenix, AZ campus with two Green Globes. We have now launched an effort to get all our existing and new buildings Green Globes certified in 2025.

Internal Collaboration with Radix IoT

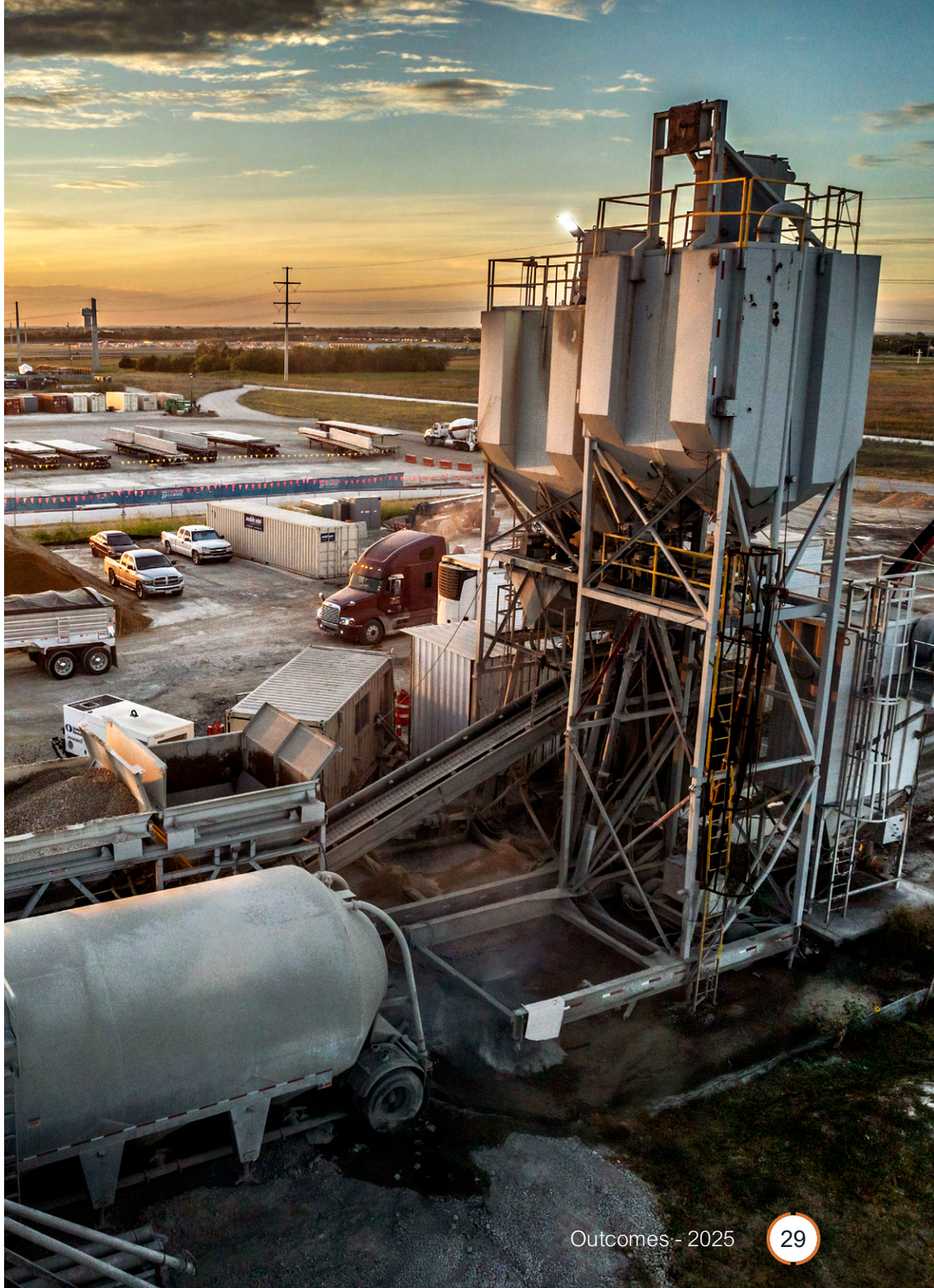
As we continue to scale rapidly, improving our understanding of our environmental footprint is essential not only for compliance, but also to uphold our commitments to operational efficiency, transparency and climate responsibility. Since 2021, we have made significant updates to how we collect and manage energy consumption and waste data through our partnership with our wholly owned subsidiary, Radix IoT.

In 2023, we began developing a centralized, in-house ESG data mart that is fully integrated within our enterprise data architecture. This platform has since enhanced our ability to access, validate and analyze ESG metrics at scale, with greater consistency and traceability. This enhances our accountability, increases operational efficiency, optimizes employees' time, reduces business interruptions and works to constantly better serve customer needs. Looking forward, we plan to integrate data from our partners and create a more interconnected data ecosystem.

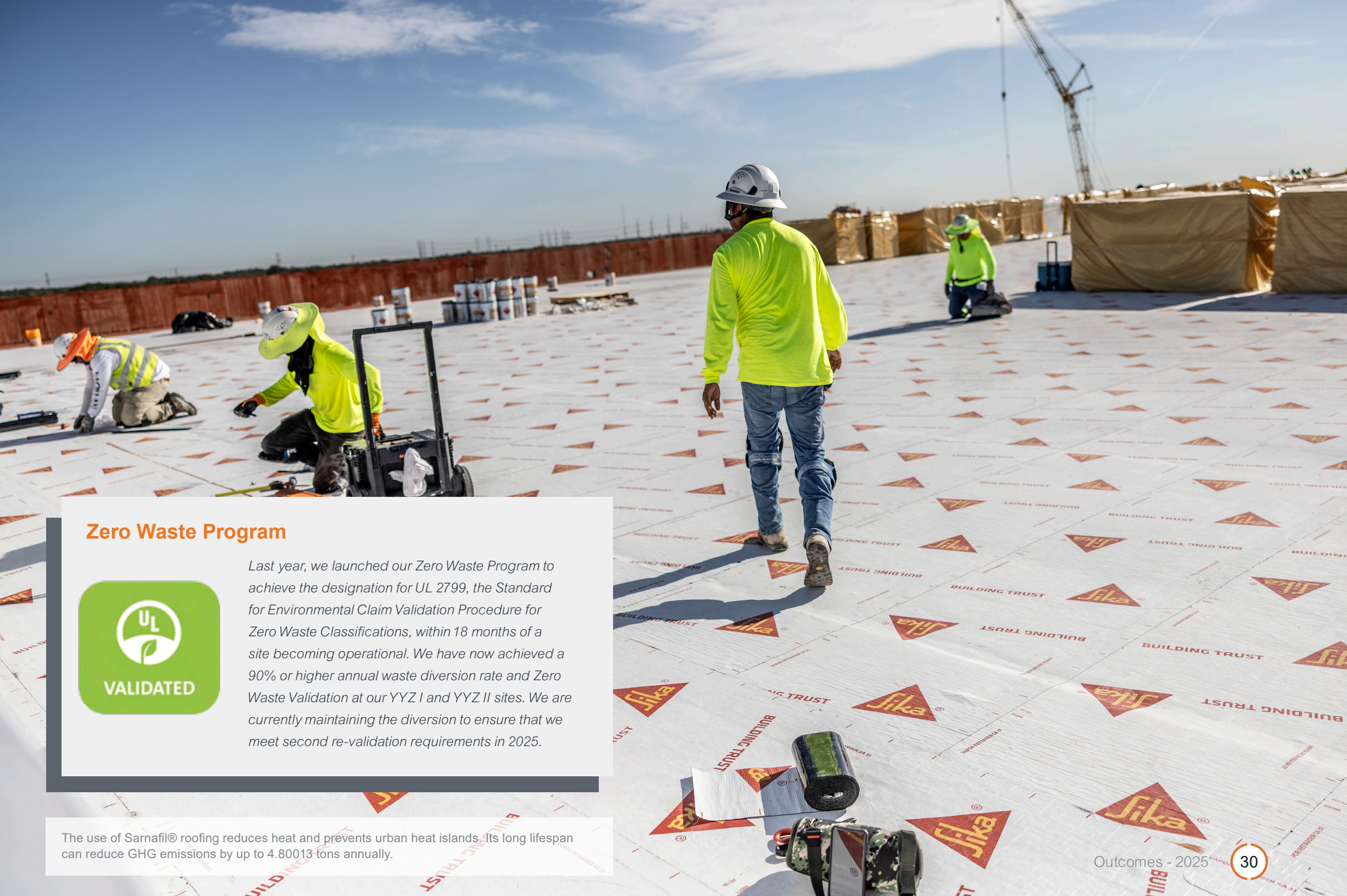
Radix IoT was recognized as:



- *The Best Big Data Analytic Solution of 2024 by Ascension Awards*
- *One of the 10 Coolest IoT Software Companies by CRN*
- *IoT Emerging Technology of the Year by IoThinkTank*



Producing cement on-site keeps trucks off the road, reducing emissions and supporting safer roadways.



Zero Waste Program

VALIDATED

Last year, we launched our Zero Waste Program to achieve the designation for UL 2799, the Standard for Environmental Claim Validation Procedure for Zero Waste Classifications, within 18 months of a site becoming operational. We have now achieved a 90% or higher annual waste diversion rate and Zero Waste Validation at our YYZ I and YYZ II sites. We are currently maintaining the diversion to ensure that we meet second re-validation requirements in 2025.

The use of Sarnafil® roofing reduces heat and prevents urban heat islands. Its long lifespan can reduce GHG emissions by up to 4.80013 tons annually.

GHG Inventory

The greenhouse gas (GHG) accounting landscape for data centers is maturing every year, and Compass aims to be an industry leader. Through our many partnerships and conversations with our customers, we are working to increase standardization in reporting. To ensure that we maintain transparent and accurate reporting, we further improved our GHG inventory methodology in 2024. This involves more accurate and granular data collection from our ESG data mart and involving our customers in the conversation to capture their energy use and offsets.

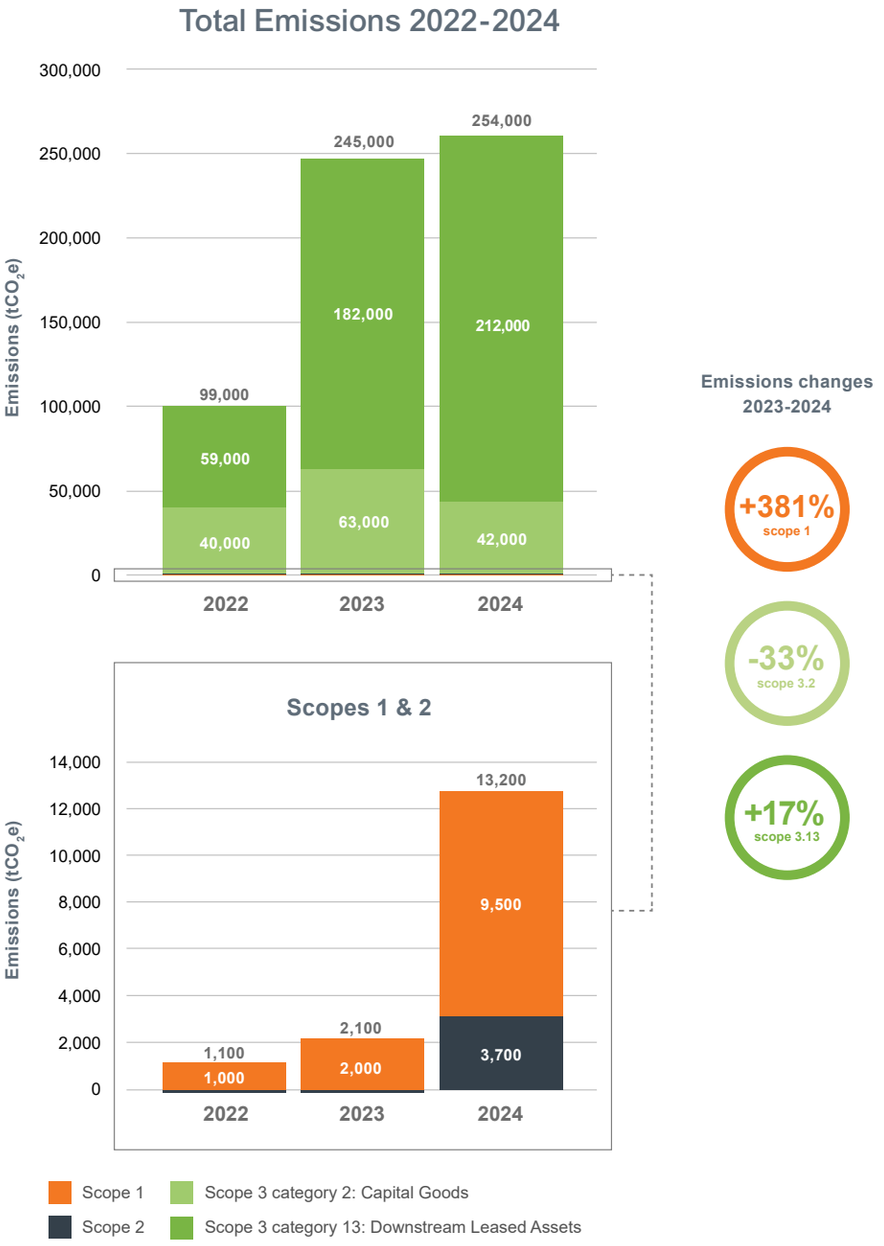
At Compass, we strive to be good citizens and do the right thing. We build our campuses to have 100-year lifespans, and we want to be good neighbors now and in 100 years from now. Our growth as a company means more absolute emissions, which does not reflect our progress to date and our commitment to grow responsibly. So, we instead focus on reducing our emissions intensity. We continue to work toward lower emissions intensities across scopes to be leaders in responsible industry growth. As we build more of our own data centers, it also means that we will have better control and access to our data to continually inform and improve our decisions and operations.

Inventory Boundaries

Our GHG inventory adheres to the Greenhouse Gas Protocol's corporate accounting standards and covers scopes 1, 2, and selected scope 3 categories relevant to the data center industry:

- **Scope 1:** Emissions from onsite fuel combustion, including diesel generators for backup power and office heating systems, as well as fugitive emissions primarily from hydrofluorocarbons (HFCs) used in cooling and refrigeration equipment.
- **Scope 2:** Emissions associated with the generation of purchased electricity used to power our operations prior to leasing.
- **Scope 3:** We currently report on categories deemed most material to our business:
    - **Category 2:** Capital goods (e.g., infrastructure equipment, construction materials)
    - **Category 13:** Downstream leased assets (leased data center space)

As our inventory matures, we plan to explore additional scope 3 categories with lower emissions profiles to improve completeness and traceability across the full value chain.



Scope 1 and 2 Methodology

Our scope 1 and 2 emissions reflect the full operational footprint of our business. This includes all fugitive and diesel emissions from our data centers and our three corporate offices in Dallas, Texas; Toronto, Ontario; and Dublin, Ireland. Scope 1 emissions include natural gas heating from our corporate offices, diesel backup generator use and refrigerant losses from HVAC systems from both our offices and data centers.

Our methodology to calculate our scope 1 emissions remains the same as previous reporting years and we continue to strive to improve our data. We know that better data means better ESG outcomes. In particular, through fruitful partnerships with our vendors and maintenance contractors, data quality has improved to better capture refrigerant loss. This has led to an increase in our scope 1 totals. We continue to focus on improving our refrigerant loss data since this is a historically underreported source of direct emissions in our sector. We are also collaborating with our suppliers to continue to improve leak detection, reduce emissions and implement more rigorous monitoring protocols across our facilities.

"By being leaders in continuous improvement of data, we hope to be part of better outcomes industry-wide."

–Nancy Novak, Chief Innovation Officer

Scope 2 emissions are relatively small and include only electricity purchased from the grid for office use and in the data centers before the building is handed over to the customer. In previous years, we have not had the data to separate our buildings' electricity consumption before and after turnover to our customers. Recent improvements to our data mart have allowed us to make this important distinction going forward. Because of the change to scope 2 emissions reporting, a year-over-year comparison is not useful between 2023 and 2024. Compass owns but does not operate our active data centers. All power use onsite after turnover is driven by our clients' IT loads and ancillary services, making them our scope 3 category 13 emissions. This is by far the largest source of emissions in data center operations.



Scope 3 Methodology

As a company at the intersection of digital infrastructure and real estate, our most significant emissions lie beyond our direct operational control. In line with the GHG Protocol, we focus our scope 3 disclosures on the categories most material to our business: category 2 (capital goods) and category 13 (downstream leased assets). These emissions represent the environmental footprint of our data center construction and the electricity consumed by our tenants.

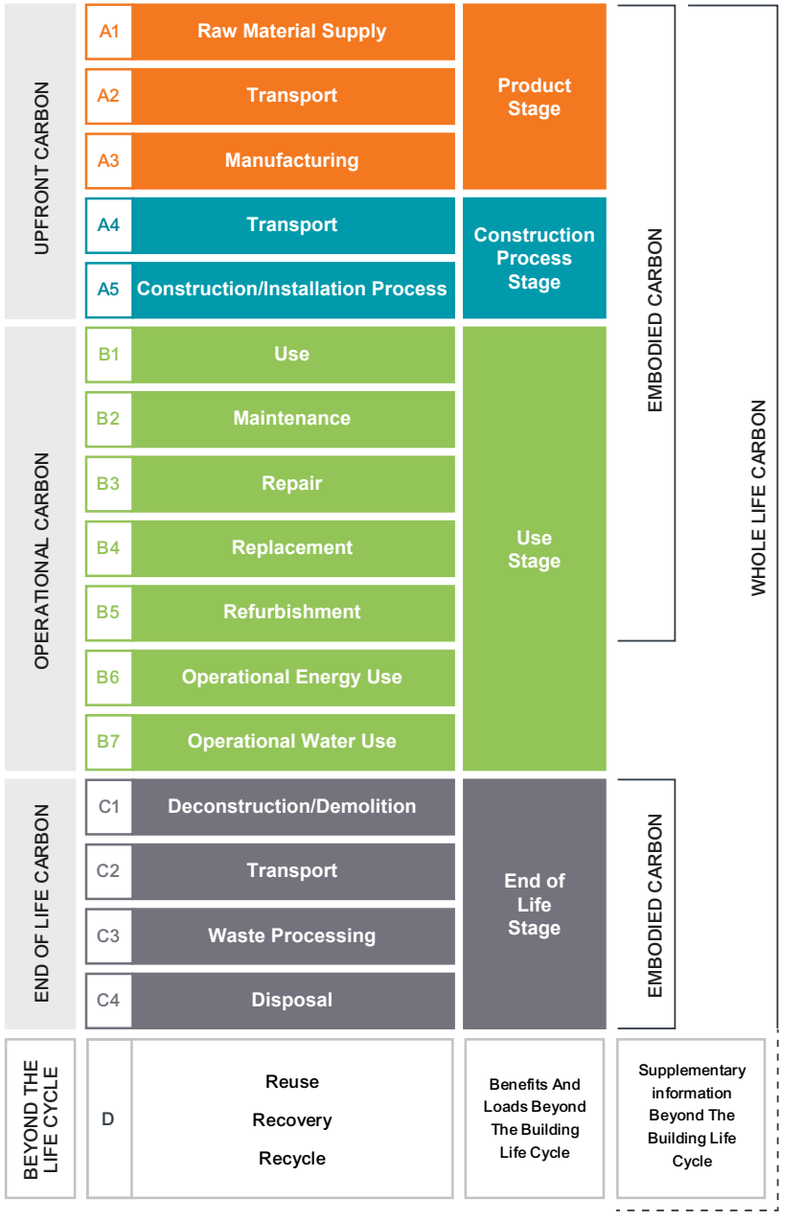
Category 2: Purchased Capital Goods and Services

Category 2 emissions reflect the embodied carbon of the materials and services we procure primarily for data center construction. This includes all product stage lifecycle emissions (A1-A3; see right-hand figure) associated with the extraction, processing and manufacturing of materials such as steel, concrete and other key building components. Emissions from sitework, tenant equipment, office furniture, fixtures, and equipment (FF&E) and mechanical, electrical, plumbing (MEP) are currently excluded.

While the full construction of a data center can span multiple years, the structure and envelope are typically completed in the first year. To maintain consistency and comparability across our GHG inventory, we account for all construction-related emissions in the reporting year aligned with the project's start.

This approach allows us to reflect the carbon implications of our growth strategy in real time and gives stakeholders insight into the upstream impacts of our capital investments.

Building life cycle stages



Category 13: Downstream Leased Assets

Category 13 accounts for the electricity consumed by our clients within leased Compass data centers, including energy used to power servers, storage, networking and cooling. Due to the energy-intensive nature of digital workloads, this category consistently represents the largest share of our total emissions.

In 2023, we significantly improved the accuracy and granularity of category 13 reporting through the implementation of our ESG data mart – an internal platform that consolidates real-time fuel and electricity consumption data across many of our operational sites. As new data centers came online, particularly in regions with fossil fuel-heavy grids, the improved data quality led to a notable increase in reported emissions, both in absolute terms and on an intensity basis.

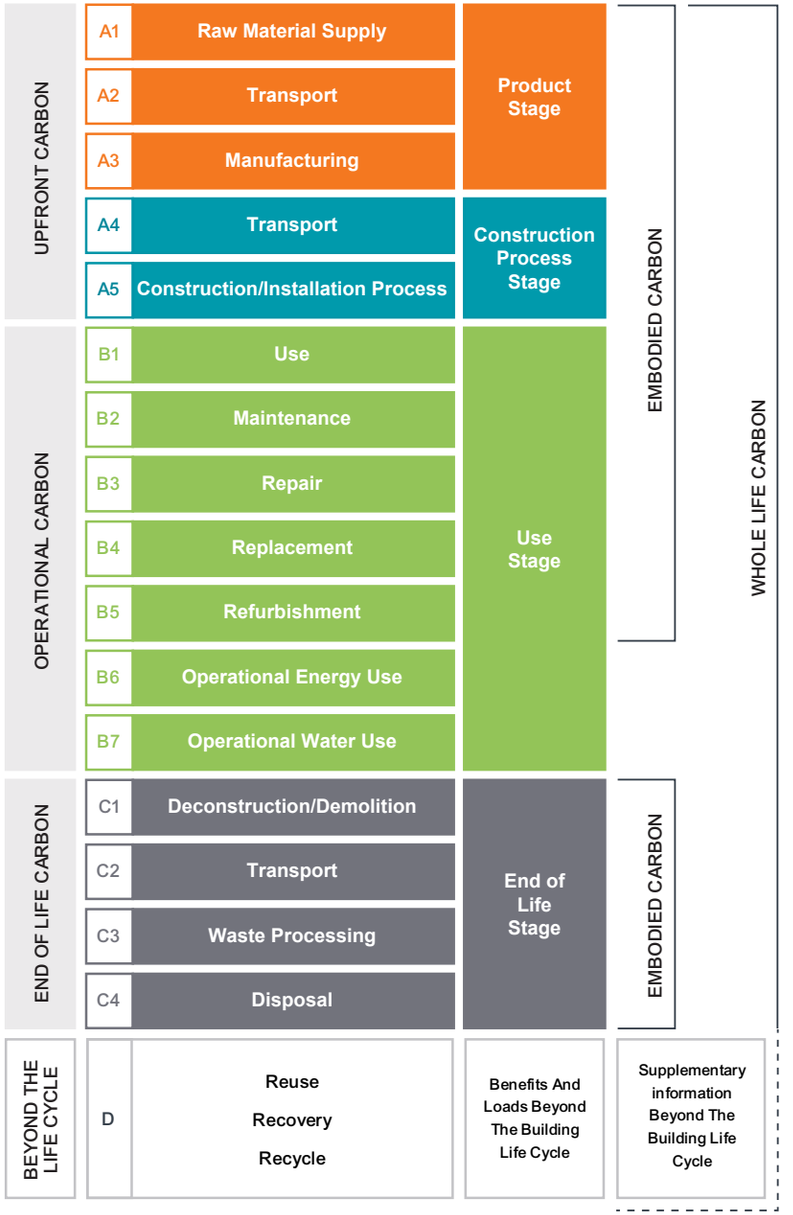
While we do not have operational control over these emissions, we recognize our role in supporting clients to reduce them. Our strategies include:

- Encouraging tenant electricity offsets via renewable energy credits (RECs), power purchase agreements (PPAs) or other verified instruments
- Designing energy-efficient facilities that reduce IT and cooling energy loads
- Promoting the adoption of low-carbon fuels, such as hydrotreated vegetable oil (HVO), for backup diesel generators

Work is ongoing to implement these joint projects with our customers. In 2024, we collaborated with them to identify their offsets to further improve the accuracy of our GHG inventory. As a result, we know that our 2024 emissions have been partially offset. This year, there was a notable drop in Compass' 3.13 emissions intensity. We hope to build on our success going forward.

Looking ahead, we will continue working with lessees to improve transparency on their energy consumption and offsetting strategies, and to accelerate the transition to low-carbon computing.

Building life cycle stages





Emissions data informing closely coupled partnerships

Our continuously improving GHG inventory data informs our initiatives to reduce emissions intensity. Starting with findings from our 2023 GHG inventory, we did a deep dive with our closely coupled partners to better understand our full supply chain and their methods. This detailed look brings to the forefront opportunities for improvements, all of which contribute to overall reductions per MW capacity. Moving forward, this will inform more targeted efforts to reduce our emissions intensity, such as through lifecycle assessments (LCAs), working with more suppliers to improve upon baseline and more.

Year-Over-Year Changes

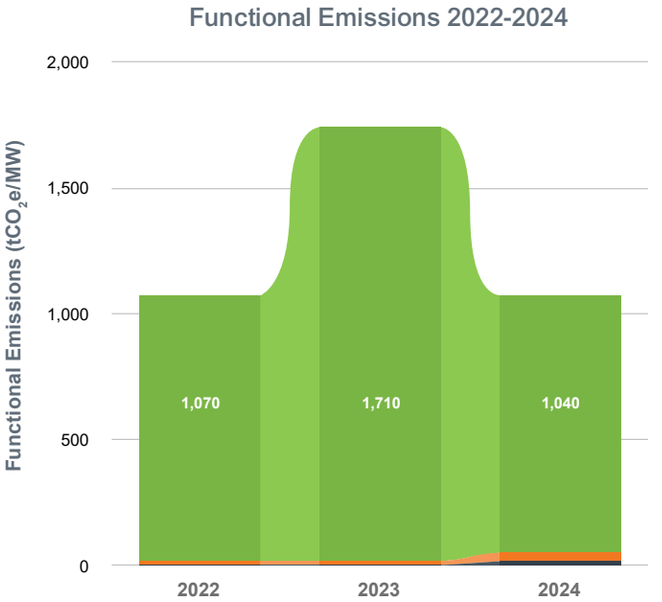
Our data center campuses are rapidly expanding. This growth is represented by the significant increase in our scope 3 emissions. We are committed to reporting our emissions and continue striving to reduce our emissions intensity.

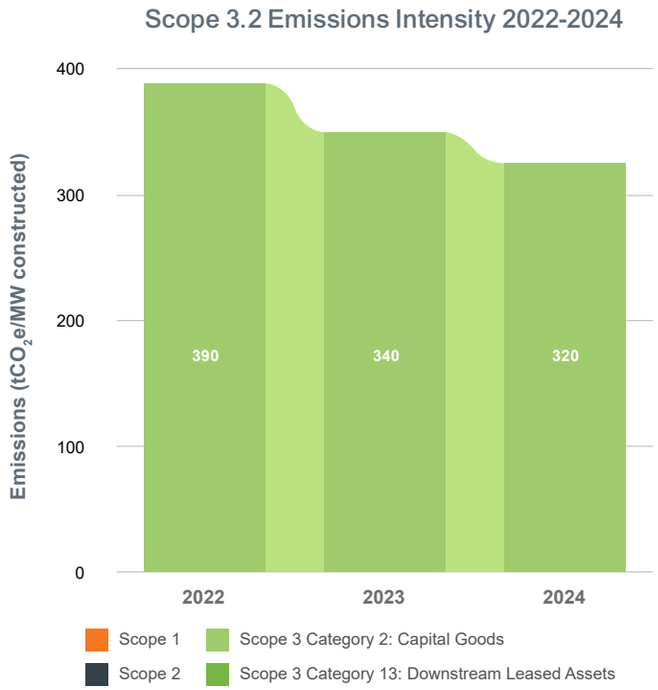
As a result of our improved data collection and quality of refrigerant use and loss, our scope 1 emissions intensity increased 150% from 2023-2024. In 2023, we had relatively low data coverage of fugitive emissions. Therefore, 2023's scope 1 emissions were likely an underestimation. Furthermore, 2024 fugitive emissions are likely overestimated, as we are currently unable to distinguish between recovered refrigerant and true fugitive emissions. We expect subsequent reporting years to have more consistent values as we continue to work with our partners.

Scope 2 emissions intensity also increased significantly this year due to a small methodology change. As we build bigger, we are more and more attentive to innovative possibilities to manage our emissions. Updating our methodology and continually striving for better data is part of this. This is the first year we have been able to include data center electricity use before customer turnover in our scope 2 emissions. We are now proudly more aligned with GHG Protocol best practices.

Scope 3 category 2 emissions decreased by 33% this year, with fewer new buildings beginning construction. This is because 2024 was a year of continuing and completing sites that began construction in 2023. We are excited to have many of these coming online in 2025! Overall, there was a 6% decrease in scope 3 category 2 emissions intensity per MW constructed. We continue to see efficiencies of scale as we build bigger and more power-dense sites. We strive to reduce our construction-related emissions further by working with our supply chain partners to scale lower-carbon materials and equipment.

Scope 3 category 13 emissions increased in 2024 as more buildings became operational. However, our emissions intensity decreased by 39% due to lower-than-average loads from recently turned over buildings. As our newer buildings ramp up to full capacity in 2025, we expect the emissions intensity to increase again. By working together with our customers, we hope to build upon our current success in future years. Namely, we are working more and more to account for scope 3 category 13 offsets. In 2024, 13% of our portfolio includes high-quality offsets purchased by our customers.





Figures have been rounded

Change in Emissions Intensity 2023-2024

+150% scope 1 emissions intensity

-6% scope 3.2 emissions intensity

-39% scope 3.13 emissions intensity

SOCIAL



Social

At Compass, our success is rooted in people: those who build, operate and are impacted by our data centers. We believe that delivering long-term value starts with creating an environment where our employees, partners and communities can thrive.

As we grow, we're invested in what matters most: the well-being, inclusion and growth of our employees, communities, and partnerships. The data center industry moves quickly, and we're committed to doing things differently by prioritizing people and forging strong relationships with those around us.

We view each project as an opportunity to contribute positively to the surrounding community. Through engagement, transparency and collaboration, we aim to build not only data centers but shared outcomes that strengthen the social fabric of the places we operate.

Strengthening the Team at Every Turn

Compass' resolve to make lives better for Compassers, construction crews and communities grew stronger in 2024. With an eye on the outcome, we focused on strengthening safety and culture at every turn. New culture trainings were added and a study of our culture to help us identify opportunities to improve got underway in 2024. We saw the Frontliners safety initiative take root and grow, all amid a massive expansion of the Compass team and project footprint.

"Our culture is unique! Humility In, Pride Out… We value diversity and inclusion clearly reflected by the different backgrounds of our team. Most importantly, our great leaders lead by example!"

- Compass Employee





By the numbers

- *92.21% of employees are considered "Highly Engaged Employees"*
- *80% of men and 93% of women agree with the statement: "If I contribute to the organization's success, I know I will be recognized"*
- *Top 3 words that best describe Compass' work environment: Collaborative, Challenging, Engaging*
- *Benefits Score of 72/100*

Compass Named a 2024 Best Place to Work by the Dallas Business Journal

In 2024, Compass Datacenters was once again named one of the Best Places to Work by the Dallas Business Journal. To make the esteemed ranking, employees were asked to complete an extensive survey, which was tallied and reviewed by a third-party. Compass earned an A in the annual workplace survey with a score of 90.37/100.

Survey results reflected a remarkably engaged workforce. Employees reported feeling challenged, and through that challenge, also said they felt recognized. They said the culture at Compass made them feel seen, heard and valued. Collaboration, purpose and day-to-day engagement within and among teams earned Compass the No. 35 spot on the outlet's list of best places to work in Dallas.

"Every one of my coworkers I've interacted with genuinely cares about me and my success… My health and well-being are highly prioritized by the company's leaders."

- Compass Employee



Best But Striving for Better

Winning multiple Best Places to Work awards is great, but continuous improvement drives us to keep considering what could be better. To better tell our story and understand the true nuances of culture, Compass commissioned a deep dive into culture with Dr. Christine Cutuchache in the Spring of 2024.

Starting in the second half of the year, the study sought to take a deep dive on Compass culture to understand – from the team's perspective – what makes Compass culture truly unique and how it can be a true differentiator for our fast-growing company. Qualitative sampling was completed at-random, balancing gender, geography, subject matter expertise, positionality and length of tenure. Almost 75% of those who were asked to be interviewed answered the call and spent, on average, 45 minutes talking to researchers. Looking at qualitative and quantitative data, researchers are discovering which attributes of Compass culture make it distinct and powerful as we continue to grow.

Diversity Drives Strong Outcomes

"Compass is inherently diverse. We are celebrated for being 20 percenters in our jobs, which means we are a collective team with unique skillsets all pointed in the same direction… Despite the growth, culture is treated as something precious. It is a rudder that makes all things possible. This is truly the best place I've ever worked." - Compass Employee

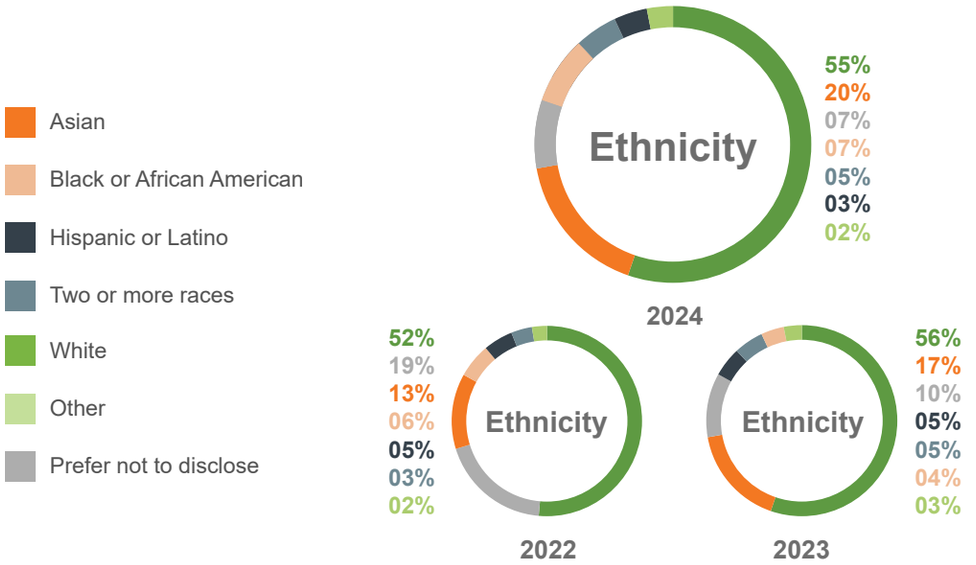
Diversity is an outcome of our strong formal culture. The nature of diversity reporting calls us to count race, gender, nationality, socioeconomic backgrounds and other similar diversity measures. But what we truly value about diversity is the outcomes that it yields. Having so many different backgrounds, approaches to problem solving, ways of thinking and interacting under the Compass umbrella drives outcomes needed in an industry that's rapidly evolving.

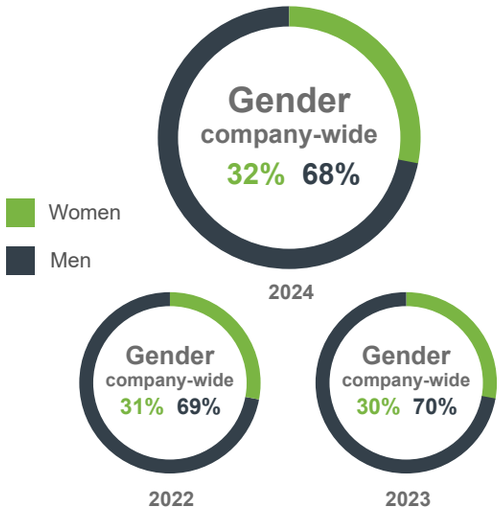
Our team consisted of 182 employees, with 56 new hires and 10% attrition rate in 2024.

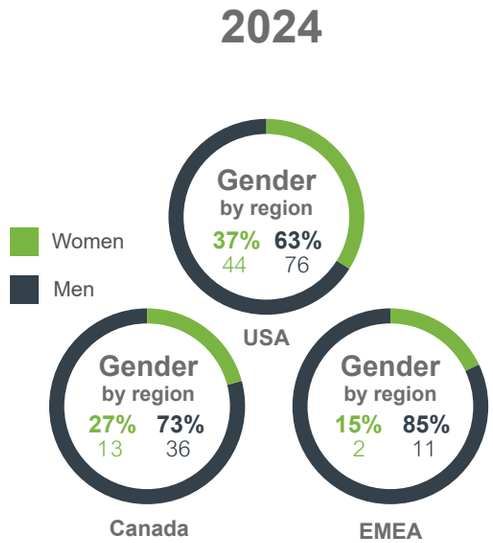
Unless otherwise stated, all personnel figures are accurate as of December 31 of the reporting year.

By the numbers

- **84%** *of U.S. constructions managers are female*
- **22%** *of Executive Leadership Team (ELT) was female at year end 2024*







Leveraging Diverse Perspectives

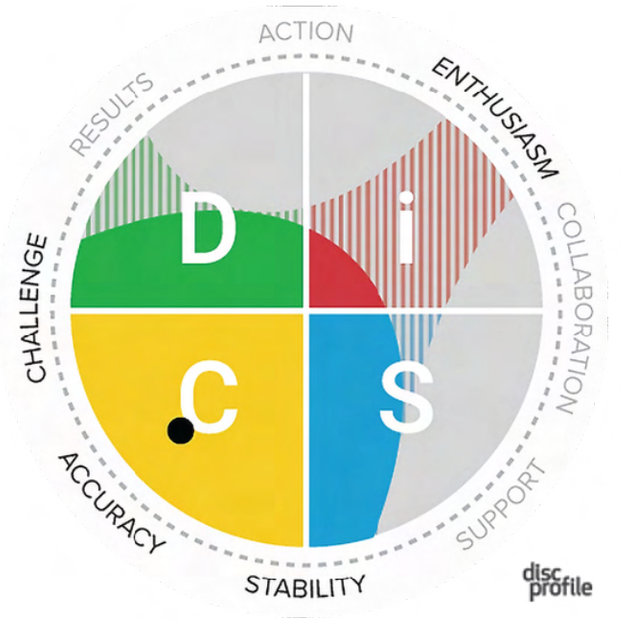
Where our diversity shines is in the many and varied personalities and work styles that report in to solve problems and support positive outcomes.

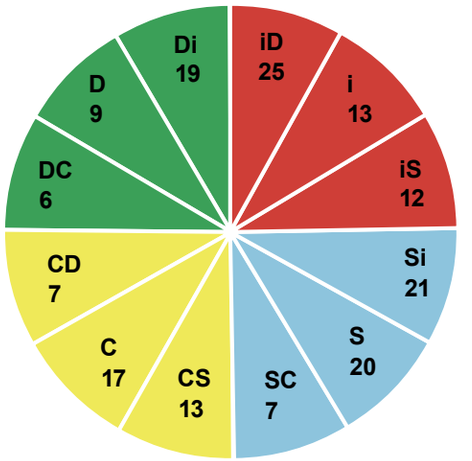
All Compassers take the DiSC Catalyst assessment before they show up on their first day. We do this strategically, to capture the true, unadulterated essence of each individual's personality. And then we leverage the DiSC Catalyst for its actionable insights on how to effectively communicate and collaborate with different colleagues. This empowers our team to anticipate potential challenges, proactively adjust their approach and ultimately minimize misunderstandings while fostering smoother, more productive interactions.

We don't just assess DiSC styles, we integrate them into how we work every day. We even display DiSC profiles on desk nameplates, not just as a label, but as a constant reminder for everyone to understand and appreciate the diverse communication and working styles around them.

We have integrated DiSC style analytics into our HR metric dashboard, giving us a clear, ongoing snapshot of our company's unique personality and talent mix.







DiSC is a workplace personality assessment tool to help improve teamwork, communication and productivity. DiSC stands for the four main personality profiles in the model: (D)ominance, (I)nfluence, (S)teadiness and (C)onscientiousness.

Employee Training & Benefits

With the core conviction of continuous improvement always top-of-mind, Compass teams participate in a host of trainings at work and are invited to seek out other continuing education opportunities, with costs covered by Compass through our Learning Reimbursement Program.

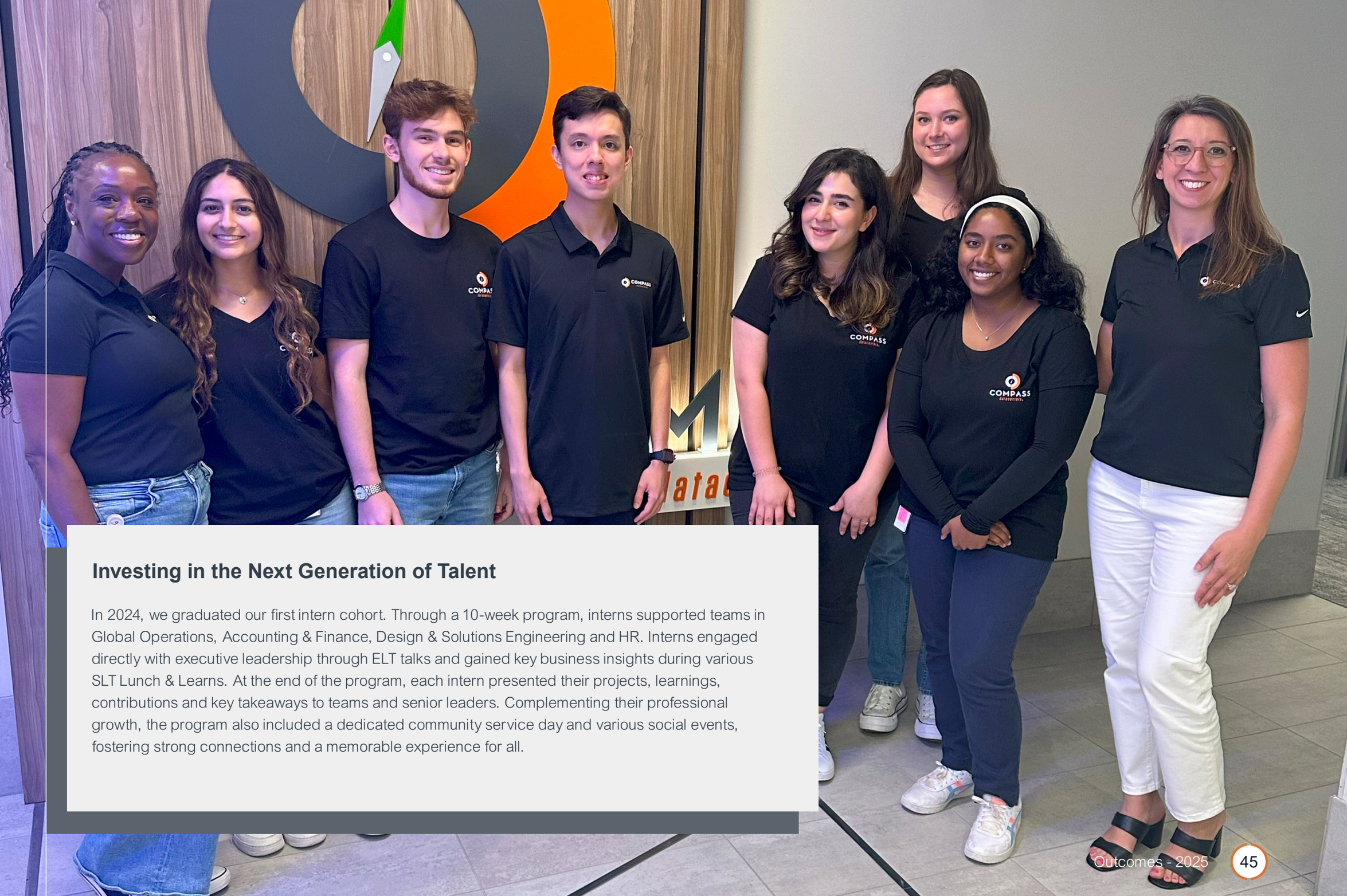
- **Monthly Culture Sessions:** All employees participate in monthly culture training sessions on topics such as effective meeting practices, using DiSC for self-awareness and applying culture to daily work. These highly collaborative sessions facilitate valuable cross-functional, cross-office discussion and brainstorming, strengthening how we work together and achieve our goals.
- **Compass 101:** Compass 101 is an internal video series that gives employees a deeper understanding of key business topics. Videos cover subjects like How Compass Makes Money, Operations Kit of Parts, Innovation, Prototypes and more.
- **Unconscious Bias Training:** In 2024, we launched the "Hiring Process & Unconscious Bias" training for our hiring managers. This course outlines best practices for welcoming new team members, with a key focus on identifying and mitigating unconscious biases to ensure fair and proper decision-making throughout our recruitment process.
- **Cybersecurity & Policy Acknowledgement Training:** We ensure responsible operations and uphold ethical conduct through mandatory training for all Compass Datacenters employees. These trainings cover essential cybersecurity best practices for network and device safety, alongside acknowledgment of all essential company policies.
- **Bi-Monthly SLT Training:** Our Senior Leadership Team (SLT) participates in bi-monthly training focused on enhancing strategic leadership and driving organizational growth and positive culture.





In addition to this embedded continuous professional development for employees, we are proud to offer additional benefits for our employees.

- **HeadSpace:** Headspace is a mindfulness and meditation app that offers guided sessions, sleep support, stress management tools and mental wellness resources to help employees build healthier habits and improve overall well-being.
- **Annual Health Fair:** In October 2024, Compass hosted its Annual Health Fair, offering employees access to various health resources and information to promote their well-being.
- **Community Outreach:** We believe it is important to understand and connect with the communities we serve. We provide various opportunities for our employees to engage with communities in different ways:
  - **Minnie's Food Pantry:** Our Summer 2024 Internship Program featured a dedicated community service day at Minnie's Food Pantry in Plano, Texas, involving both interns and Compass team members. This volunteer effort was amplified by a food drive within the office in the weeks prior, where Compass employees donated essential items, which were delivered on the day of service.
  - **Angel Tree Program:** In December, Compass participated in the annual Angel Tree program, providing Compass employees the opportunity to sponsor "angels" from a classroom at a local elementary school. The gifts were then personally delivered by Compass team members to the children's classroom, fostering a direct connection with our local community.
  - **"DataCenterSleevesUp 2024" Blood Drive:** Compass partnered with Carter BloodCare for an office blood drive, providing employees with the opportunity to donate blood and enjoy complimentary snacks and lunch, along with a thank-you goodie bag for their participation.



Investing in the Next Generation of Talent

In 2024, we graduated our first intern cohort. Through a 10-week program, interns supported teams in Global Operations, Accounting & Finance, Design & Solutions Engineering and HR. Interns engaged directly with executive leadership through ELT talks and gained key business insights during various SLT Lunch & Learns. At the end of the program, each intern presented their projects, learnings, contributions and key takeaways to teams and senior leaders. Complementing their professional growth, the program also included a dedicated community service day and various social events, fostering strong connections and a memorable experience for all.

From Internship to Full-time Team Member

Q: What was your internship experience like?

A: I was doing my master's in Organizational Psychology and needed an internship. I knew I was interested in HR and found out about the opportunity at Compass. It was 10 weeks in the summer and I knew I liked being at Compass within the first couple weeks. Compass culture was a great fit because I could see they took it so seriously and it was a great opportunity for me to get in there and see what it's all about. In the first couple weeks I got to sit down with Chris, our CEO, who did a Culture Session for each new hire, and the intern group got to meet with him and ask questions. There was more formal training in the first two weeks too, but I trained throughout the summer. We had "ELT Talks" and, later in the summer, "SLT Talks" to get to sit down with leadership and dig deep into questions.

Q: What about your experience made you want to stay on as a full-time employee?

A: I liked Compass right away. I wasn't sure if I'd stay on, but as the summer weeks went on, I developed great relationships and it led to discussions about me continuing my projects beyond the 10 weeks. I stayed on part time while I finished school and then started new projects and joined full time in the new year. And I actually got to take on running the entire Internship Program this year!

Q: How have you worked to improve the Internship Program? What has it been like going from intern to leader of the entire program in just one year?

A: Being assigned the Internship Program was a great crash course on HR, employee lifecycle and program planning for me since this was my first job out of school. I was able to look back on my experience and reflect on what worked and what didn't. I even consulted other interns from my summer for feedback. Now running the program all by myself, it's going really well! I'm excited to see everyone's experiences playing out.

Q: Compassers often refer to themselves as "weird," what makes Compass weird to you? How do you see the organization doing things differently?

A: When I first met with Chris, he was telling us about what makes the culture weird. He told us how it's weird for companies to invest so heavily in people. This is definitely true – it's not the norm for companies to invest in culture so much and make sure employees are actually happy. We're also not afraid to fail and this is a major part of the culture. Failure is seen as a learning opportunity. You have to fail before you succeed, so no one is afraid to take risks.





Innovation Impacting Health & Safety Outcomes

Compass has been an industry change maker when it comes to health and safety, impacting outcomes that extend well beyond our company. We create and publicize programs for as many parties as possible to reap the benefits because it's the right thing to do.

We have achieved a number of significant firsts in 2024, building on new initiatives that involve close collaboration with our partners, who share our commitment to protecting our workforce. We also encourage adoption of our best practices across the industry through conference keynote addresses, trainings and other efforts that make our programs the gold standard for data center and construction companies.

Our independent Environment, Health and Safety (EHS) body, which reports directly to our CEO, continues to ensure that our protocols are followed closely and serve as a valuable resource for recommending enhancements. Thanks to the collective efforts of our world-class safety team, our partners, our EHS board and all of our employees, we are proud to share that our Total Recordable Incident Rate (TRIR) is 0.68 for 2024.

Throughout the week of May 6-10, 2024, we held Safety Week events across all construction sites led by general contractor partners. Topics included first aid, demonstrations on fall protection and arc flash awareness and more.

Safety Built Into the Way we Build

One of the most significant innovations that Compass has brought to the data center industry is our use of prefabrication, which delivers significant benefits not only in speed, quality and sustainability but also safety. By prefabricating most building components offsite in a factory, Compass is able to transform the construction environment in ways that are far safer than traditional stick-built approaches to commercial construction.

In 2024, Compass added to its industry-leading expertise in prefabrication techniques by naming Amy Marks, a highly respected prefabrication expert, as our SVP of Innovation. Marks and our Chief Innovation Officer, Nancy Novak, are working side-by-side to continue to develop and implement best practices that optimize safety for our employees and the workforces of our general contractors.

In addition to supporting advancements in our prefabrication environments, Compass also continues to be a leader in safety best practices on-site where our facilities are assembled from the prefabricated components. Led by our VP of Safety, Rachel Neal, our safety program is continually implementing new practices that make our large construction sites safe places to work.



Continuous Improvement in Safe Operations

In addition to our commitment to safety during every phase of construction, our operations methodologies are designed to protect our employees, customers' employees, equipment partners, service vendors and other visitors when they are in our data centers. This is a responsibility we take very seriously, given the inherent dangers of working in an environment that presents risks related to electrical power, large equipment and other factors. We take great pride in our operational safety program and how much stronger it gets every year.

In 2024, Compass strengthened its operational safety by applying our core conviction of continuous improvement of people, processes and systems to make our facilities an even safer place to work. These enhancements include:

- Pilot projects for an AI-powered predictive maintenance program that reduce the number of maintenance interventions that operations team members – all while increasing the reliability and performance of those systems
- Collaboration with key equipment partners to optimize the design and maintenance requirements of power and cooling equipment to enable safe data center operations
- Significant curriculum additions to our safety trainings that incorporate new best practices established by our safety team, our equipment partners and data center operations experts
- New technologies and processes that enhance communication among team members that ensure safety protocols are followed while capturing critical information for continuous improvement
- Compass ensures the safety of its crews by employing dedicated on-premise medics



Compass transitioned from traditional hard hats to safety helmets in 2024. The new requirement has been in place across all construction sites since August 2024.

Frontliners: Leading the Way to Better Safety Outcomes

In 2024, Compass and our construction partners significantly expanded the scope of our first-of-its-kind Frontliners Program, which provides a new blueprint for fostering safety, quality, innovation and mental health in the industry. We kicked off this program at our Phoenix, Virginia and Milan campuses. The Frontliners Program has been recognized by industry pundits and organizations for its impact as a unique and effective approach to improving site safety.

The Frontliners program is nominated for a number of awards, including:

- The 2025 Groundbreaker Awards
- AGC's 2025 Construction Safety Excellence Awards (CSEA) 2026

The program has also been acknowledged by industry media as a milestone for the industry, including these articles:

- Datacenter Dynamics: "Compass Datacenters launches safety and mental health program for construction workers"
- Capacity Media: "Workforce development – crisis or catalyst?"

No one is more critical to safety on construction sites than frontline supervisors, whose leadership is indispensable for the success of our development projects. The Frontliners Program empowers these frontline leaders to be powerful advocates for change while also enabling them to have honest conversations about topics such as areas for process improvement, crew mistakes and employee stress. Centered on Compass' long-time commitment to continuous improvement and the power of humility to drive positive change, the Frontliners Program has proven to be a gamechanger at the worksites, as well as a model for the entire industry.



In close collaboration with our most important construction partners, the Frontliners Program rollout was completed in 2024. The program is now in place at all of Compass' in-development campuses. Compass' VP of Safety, Rachel Neal, and Chief Innovation Officer, Nancy Novak, have expanded the impact of the Frontliners Program in 2024 by educating data center, construction and safety professionals about how to create similar programs at their organizations. Neal and Novak's presentations in 2025 included keynote addresses at the following conferences and industry events:

DATA CENTER Frontier TRENDS SUMMIT™

ASSP SAFETY25 CONFERENCE + EXPO

Electrical Safety & Operational Reliability
2025 CONFERENCE

"I have been in the construction industry for over 30 years, and I have never seen anything like the Frontliners Program. This is really great for our industry."

–Frontliner at our DFW campus

"I have been in construction safety for 26 years, and the burden has always been on workers to be completely responsible for safety. The Frontliners Program is a big positive change because it makes safety everyone's responsibility. It sets everyone up for success and encourages conversations that make us all safer."

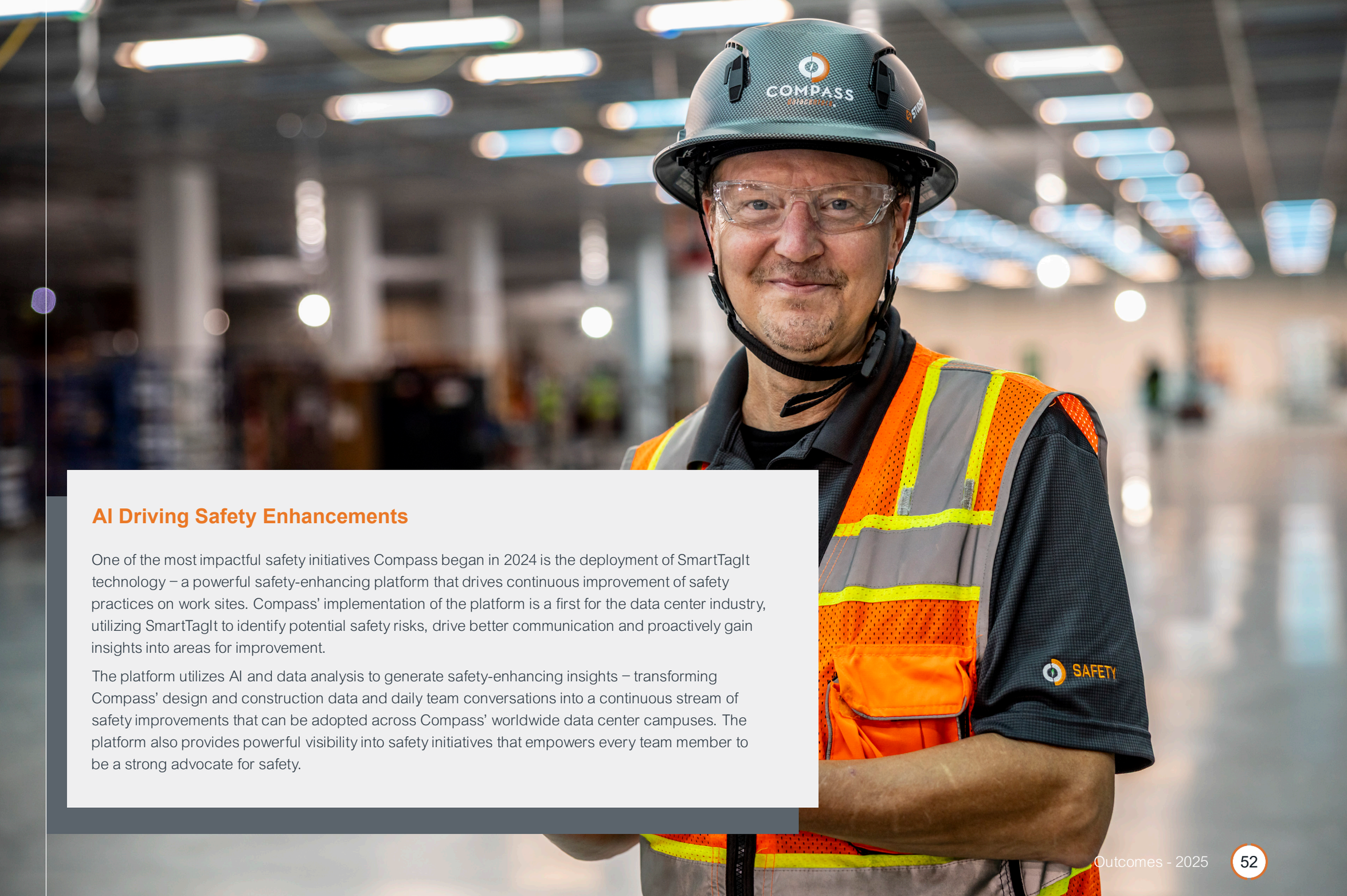
–Employee of customer at our PHX campus

"Being able to talk about what we would do differently is a really big change for construction sites. That has never been encouraged on past projects I have worked on. Talking about these things will help us make things safer."

–Frontliner at our PHX campus

"At the end of the day, we all want to get home safely. And the Frontliners Program creates an environment where crews can have important conversations. There will always be mistakes and failures at construction sites because people are human and because this work is dangerous, but Frontliners helps us fail safely and learn from those mistakes so we get safer every day."

–Employee of customer at our PHX campus



AI Driving Safety Enhancements

One of the most impactful safety initiatives Compass began in 2024 is the deployment of SmartTagIt technology – a powerful safety-enhancing platform that drives continuous improvement of safety practices on work sites. Compass' implementation of the platform is a first for the data center industry, utilizing SmartTagIt to identify potential safety risks, drive better communication and proactively gain insights into areas for improvement.

The platform utilizes AI and data analysis to generate safety-enhancing insights – transforming Compass' design and construction data and daily team conversations into a continuous stream of safety improvements that can be adopted across Compass' worldwide data center campuses. The platform also provides powerful visibility into safety initiatives that empowers every team member to be a strong advocate for safety.

Partnering to be Better Neighbors and Strengthen Communities

Compass places a high value on being a good neighbor and improving lives wherever we work, striving to leave local communities better than we found them. Our commitment to continuous improvement guides how we show up and partner with people and groups in local communities.

Responding to Neighbors' Concerns in Leesburg, Virginia

In 2024, we completed work to improve the sound profile of our Leesburg, Virginia campus.

In close collaboration with our cooling technology partner, Vertiv, our engineers redesigned fan mounts in the cooling units at the site to eliminate a sound that had been bothersome to a few neighbors.

The work enabled us to achieve a 3% to 10% lower frequency at the single unit level and up to a 20% improvement at certain low frequencies at the site level. A software adjustment to existing systems further reduced sound pressure, eliminating tonality at neighborhood sites. This small change, made possible by clever and collaborative teams, is expected to have a positive impact for our neighbors and the future of our industry.





Breathing New Life Into an Abandoned Office Campus

Repurposing the expansive site of the long-abandoned, former Sears' headquarter office campus got under way with a kick-off event in the Village of Hoffman Estates in the summer of 2024.

Our approach to converting this brownfield site to a data center campus prioritizes sustainability, mirroring our greenfield development projects. In line with our "go slow before we go fast" philosophy, demolition was executed methodically to minimize waste and completed ahead of schedule.

Concrete, stone blocks and asphalt from the existing site have been crushed and are being repurposed as fill or aggregate in new concrete production, with an AI application optimizing the use of these locally available materials to reduce greenhouse gas emissions.

Hoffman Estates Mayor William McLeod said it best when he said, "this begins a new chapter for this high-profile property and continues the technology diversification of our local economy."



Challenging Communities to Delete Digital Waste

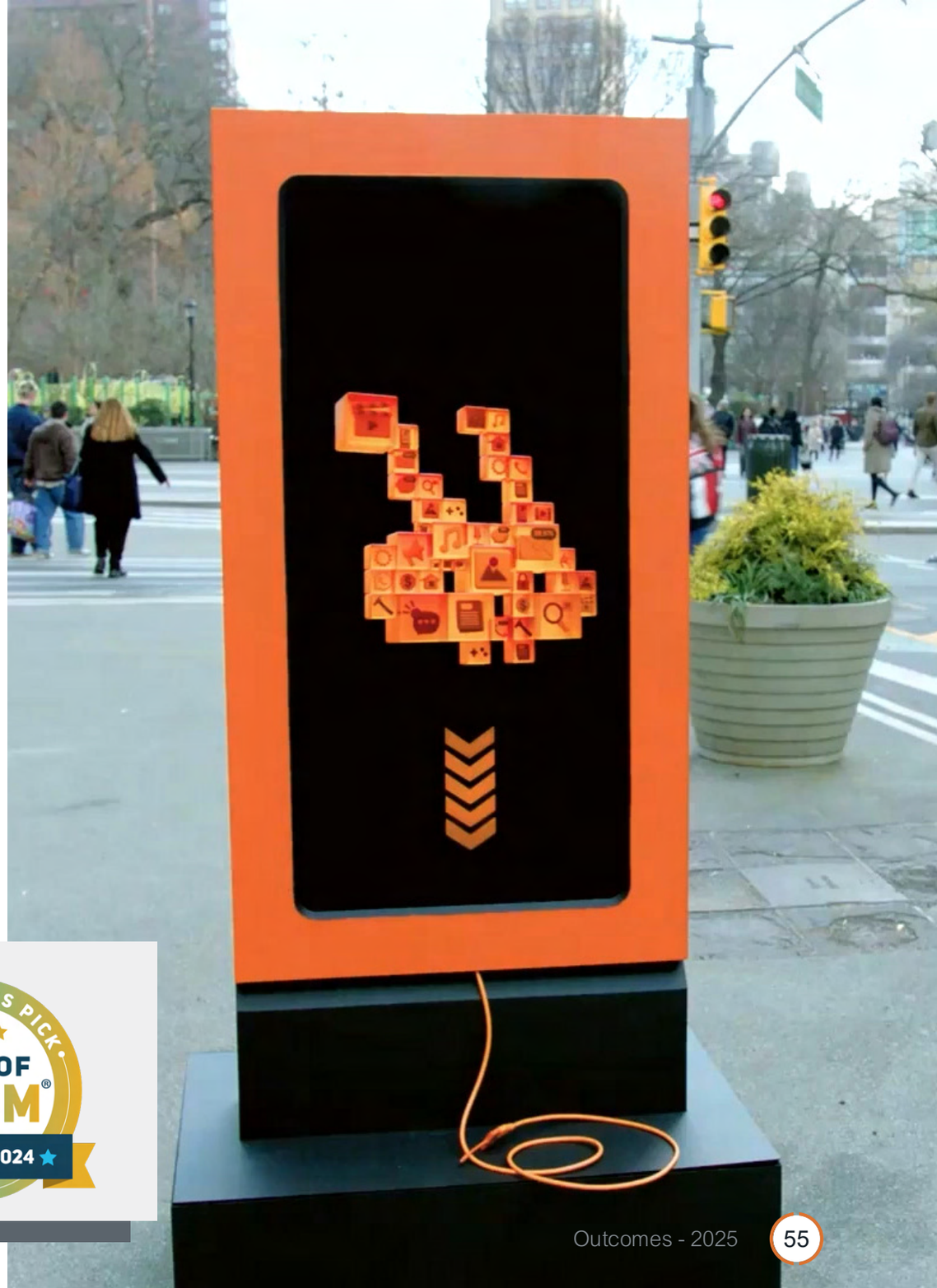
Compass commitment to zero waste isn't just about physical waste. Recognizing the problem of rapid proliferation personal data, and after hearing concerns of the community about the seemingly never-ending development of data centers, we sought to understand the need and opportunity to reign in useless data.

A poll of 1,000 Americans revealed that:

- While most people acknowledge the need to clean their digital files, they don't do it
- Almost half are afraid of deleting something they might need later.
- One-third of respondents chalk up their digital clutter to old-fashioned procrastination
- Americans would rather do most anything (clean their house, cars and yards) than eradicate old digital files

Compass launched the "Delete Digital Dust Bunnies®" campaign in 2024 to encourage the community to become more mindful of digital waste accumulation and its environmental, economic and psychological impacts. Waste is waste. It doesn't serve people or the environment. Instead, digital clutter makes it hard to find what's needed, adversely impacts device performance and creates frustration and stress.

The campaign reached thousands of people and challenged them to be more mindful of the fact that there is physical infrastructure and power required to house all of that useless data. Deleting digital dust bunnies is the environmentally responsible thing to do.



JASON Learning

We co-developed JASON Learning's Building a Greater Digital Future curriculum with iMasons, DCD Academy, and Vertiv. The curriculum focuses on equipping students in grades 8-12 with critical skills for careers in digital infrastructure.

Creating Employment Opportunities in Communities

Recognizing the significant and growing demand for a skilled workforce in the data center industry – projected to rise between 19% and 22% from 2023 to 2030, with 53% of organizations struggling to find qualified candidates – Compass partnered with Texas State Technical College and began building the Mechanical Electrical & Information Technology Data Centers Pathway Program in 2024.

This program aims to prepare high schoolers, post-high school graduates and career changers in Ellis County for good-paying jobs in data center maintenance and operations.

We were thrilled (but not surprised) to see our partners jump on board to support the program - or more importantly, program graduates. CBRE, Salute, Schneider, Siemens and Vertiv have all joined the effort to make the MEI Data Centers Pathway program a success.



Welcoming the 5th Industrial Revolution

As 2024 ended, we finalized plans to acquire land for a new campus in Meridian, Mississippi. Our teams spent a lot of time there throughout the year. As you drive into Meridian, you notice downtown is situated along a rail line. Parts of it are old, and some are new. The charming, historic downtown scene paints a picture and invokes curiosity about what brought it into existence.

Digging into the history of Meridian, you discover its position at the intersection of the Mobile, Ohio and Southern rail lines brought about the city's Golden Age. The city seized the opportunity to participate in the Second Industrial Revolution of the late 1800s.

Meridian became a hub of commerce because of the access afforded by rail lines running in every direction. It was a manufacturing powerhouse and the largest city in the state. Bustling hotels, the state's first high rise and the beautiful Grand Opera House were gleaming markers of the city's prominence. But, as rail traffic declined, Meridian's light dimmed.

Fast forward 75 years and Meridian stands ready to participate in the Fifth Industrial Revolution. What was once an empty field alongside the interstate will soon be a source of digital transformation. The entire region becomes more valuable by virtue of being a data hub.

Just as downtown Meridian flourished with the rail system, digital connectivity begets value. Today, concentration of data supports AI's unfolding. The possibilities are virtually (quite literally) unlimited and highly valued.

Seizing the opportunity to participate in the Fifth Industrial Revolution is a boon to industries and communities. Compass is grateful to play a part in creating that economy and we're grateful to be warmly received by Meridian and the State of Mississippi.

GOVERNANCE



Governance

At Compass, we believe that strong governance is essential to the success of our collaborative approach. By partnering with industry leaders, regulatory bodies and stakeholders, we tackle challenges in innovative ways that others may overlook. These partnerships are grounded in a commitment to our core convictions and values, including transparency and accountability. Together with the support of our partners, we uphold the highest standards of corporate conduct by going beyond compliance to anticipate emerging risks and stay ahead of disruption. Through continuous engagement and policy evolution, we strengthen our governance framework to ensure long-term resilience and responsible growth. With the strong backing of Ontario Teachers' Pension Plan and Brookfield, we have been able to develop a robust governance framework, which has become embedded in our DNA.





Risk Management and Decision-Making

Our leadership team provides active company oversight, ensuring decisions align with our strategic anchors and structuring the organization for success. Accountability is key to our culture. Roles such as Steward and Shepherd clarify accountability and responsibility for managing processes and systems carefully and responsibly. While specific certifications like ISO 27001 and ISO 27701 demonstrate our commitment to structured, standardized management, this aligns with our principle of standardizing over optimizing and using established frameworks to manage risks and ensure continuous adherence to requirements through our culture of ongoing learning and improvement. This commitment fosters transparency and builds trust in all data-related practices. To uphold this, we hold quarterly board meetings and weekly operations meetings about risk considerations. This is an opportunity to raise risk-related concerns, including those related to sustainability, to the Board. Compass' global risk mitigation program, which includes a comprehensive operational risk assessment and management process, is overseen by the Vice President of Global Operations Compliance.

Compass is committed to continuous improvement, preferring small incremental improvements over occasional large ones, and embodying the "Power of Incremental" principle which states that small adjustments add up to big results over time. For business continuity planning, this translates to regular, small-scale reviews and updates of the plan, ensuring it evolves with changing regulations or internal needs, rather than being a static program.

Compliance

We are moving toward being more proactive with our compliance. By working closely with our customers and investors to understand what disclosures are important to them and being up to date with incoming regulations, we continue to improve our compliance and disclosures. This includes climate-related disclosures with the support of Manifest Climate. We are continuing to expand our compliance practices for future years and are considering the ISO 14001 standard for guidance, including screening contractors against sustainability criteria.

Climate Risk

We recognize the impact that climate risks and opportunities have on our operations, employees and communities. Climate risk is given focused attention because of this and is overseen by our Chief Innovation Officer. The responsibility and accountability of climate oversight is shared between the Chief Innovation Officer, other C-suite executives and senior management. Additionally, the Board considers climate considerations into business strategy and plans and risk management practices, managing overall organizational performance and more.

To improve our management of climate risks, we completed a portfolio-wide climate risk assessment in 2024 to identify which physical and transition climate risks are relevant to our sites and operations. We looked at the following risks to understand how climate-related impacts may affect our business and our partners:

Physical risks	Transition risks
01. Extreme heat	01. Changing perceptions of company activities
02. Precipitation (storms)	02. Market uncertainty
03. Wildfire	03. Changing energy mix
04. Flood	04. Government climate policies
05. Drought	05. Climate disclosure regulations

Based on the assessment's findings, we are incorporating risk considerations into our development processes, helping the team understand what these risks are and how to operationalize mitigation strategies.



Business Ethics and Integrity

At Compass, our approach to business ethics is based in transparency and collaboration. We hold ourselves and our partners to the highest ethical standards, knowing that strong partnerships are built on humility, continual improvement and a commitment to excellence. Our Code of Conduct applies to all employees and sets the tone for how we operate globally. We also expect our vendor and third-party partners to align with these values, especially in upholding integrity and supporting human rights, inclusion, and championing good citizenship.

To support this commitment, we've established a comprehensive Business and Vendor Code of Conduct that promotes ethical practices in full compliance with applicable laws. Core principles include:

- Obeying the law
- Conducting business with integrity
- Maintaining accurate and honest records
- Honoring business obligations
- Treating all individuals with dignity and respect
- Safeguarding Compass' information, assets and interests
- Acting as a responsible global citizen

We also enforce a strict Anti-Corruption and Third-Party Relationship Policy, which prohibits bribery, kickbacks or any form of corruption, whether directly or through intermediaries. These expectations are communicated clearly to our partners, reinforcing a shared responsibility for ethical conduct.

Our governance structure ensures accountability at every level, with oversight provided by our President and Chief Financial Officer in collaboration with Human Resources. We are aligned with the UN Guiding Principles on Business and Human Rights, which inform our interactions with clients, employees, suppliers and communities alike.

We recognize the importance of addressing potential adverse human rights impacts within our operations and throughout our value chain. When such impacts are identified, we are committed to taking action to resolve issues and mitigate future risks.

Our ethical considerations extend to:

- Conflict of interest management
- Community and stakeholder engagement
- Diversity
- Freedom of association and collective bargaining
- Ensuring a safe and healthy workplace
- Workplace security
- Prevention of forced labor, child labor and human trafficking

Together with our partners, we aim to foster a culture of integrity that contributes to long-term, sustainable growth and positive social impact.

Anti-Bribery and Corruption

Our Anti-Bribery and Corruption (ABC) policy is a core commitment to conducting all our business with the highest legal and ethical standards. This means we strictly prohibit offering or accepting anything of value, like gifts or favors, to improperly gain a business advantage from government officials or commercial parties, ensuring strict compliance with major laws such as the U.S. Foreign Corrupt Practices Act (FCPA) and Canada's Corruption of Foreign Public Officials Act (CFPOA). It's critically important because it safeguards Compass's reputation for integrity and fair practices among all our stakeholders, ensuring we earn business honestly through the quality of our services and personnel. Ultimately, this policy mitigates significant legal and financial risks for both the company and its employees, fostering a transparent and trustworthy environment across all operations.

Physical and Cyber Resilience

Physical and cybersecurity remain at the core of our data center operations. These protections are a top priority to ensure our clients and stakeholders can securely and reliably access their systems at any time. We continue to deliver industry-leading resiliency and have maintained 100% uptime across all Compass sites in 2024.

As part of our standard operating model, we provide a secure and stable environment that includes an alarm system, Uninterruptible Power Supplies (UPS), backup generators, high-speed network connectivity, 24/7/365 operator coverage and penetration testing. These measures are in place to help safeguard customer data and ensure operational continuity.

Our IT policies and procedures are designed to protect the confidentiality, integrity and availability of customer data, vendor relationships and all services related to space, power, environmental controls and physical security at our client data centers.



All Campus Security Managers have been Genetec certified

All employees complete mandatory security awareness training, including how to mitigate and manage potential security threats through mock scenarios. Our thorough incident response process is tested twice annually and goes beyond industry standard, allowing us to respond to cybersecurity incidents with best practice.

Training Hours

ABC Training

- Compass Employees: 600 hrs
- Contractors: 215 hrs

Cybersecurity Training

- Compass Employees: 182 hrs
- Contractors: 264 hrs

HSSE Training

- Compass Employees: 249 hrs
- Contractors: 973 hrs



Cybersecurity

Compass partners with a cybersecurity services firm to monitor and manage its cyber and third-party risk. We uphold a sophisticated cybersecurity risk management program using the NIST 2.0 framework, meticulously designed to navigate the complexities of our evolving regulatory and risk landscape. Our approach integrates thorough first- and third-party risk identification and mitigation strategies, with a strong emphasis on the secure integration of IoT/OT systems.

We continue to evolve our tools, processes and controls to lead the industry through the implementation of a deliberate and strategic methodology adhering to industry-leading best practices. A dedicated cybersecurity committee proactively monitors risk, deploys cutting-edge solutions and strengthens defenses. To cultivate a security-centric culture, all employees undergo mandatory cybersecurity awareness training. In 2025, we are enhancing our training program with mock incident response exercises, equipping our workforce to effectively address and mitigate potential cyber threats.

Privacy

We are committed to respecting and maintaining the privacy of all our stakeholders. Our privacy policy is available on our website, which describes how we collect and process personal information.

We are compliant with industry standards: PCI DSS, SOC 2, ISO 27701 and ISO 27001.

Matt Falluca completed his Certified Protection Professional (CPP) certification.



Awards and Recognition

Our partnerships allow us to collaborate across the industry through memberships, governing bodies, executive leadership and participation with organizations to focus on ESG:

- Uptime Institute Member
- Urban Land Institute Member
- Long Duration Energy Storage (LDES) - Anchor Member
- iMasons: Climate Accord - Founding Member; Digital Divide - Executive Sponsor
- BOD: SME DC Systems Engineering M.S. Program; National Institute of Building Sciences; World Trade Center Institute
- EcoVadis Silver Medal
- National Institute of Building Sciences

We are proud recipients of numerous innovation awards for our approach to data center construction:

- Ranked #2 in the 2024 Dallas 100 Entrepreneur Awards
- Ranked #35 on Dallas Business Journal's Best Places to Work for 2024
- Ranked #1292 on the 2025 Inc. 5000
- Achieved Zero Waste to Landfill Validation from UL Solutions
- Tony Grayson (General Manager) listed amongst Data Centre Magazine's top 10 industry influencers who are committed to sharing insights and improving the industry
- Finalist of D CEO's Innovation in Real Estate award, as part of the Innovation Awards 2024
- JASON Learning Educator's Pick Best of STEM Award

Leaders' awards

- Dallas Business Journal: C-Suite Leaders Awards – Adil Attlassy
- D Magazine: CEO Dallas 500 – Chris Crosby
- Data Centre Magazine: Top 10 Women in Data Centres – Nancy Novak
- Data Centre Magazine: Top 10 DE&I Leaders – Nancy Novak
- D CEO's Financial Executive Awards 2025: Outstanding CFO Finalist in Large Private Company Category – Jared Day



Working with New Innovations

We are excited to work with new innovations that can support our goals and further reduce our emissions. We are always seeking new innovators to collaborate with. Some current ones include:

CARBON CURE™

Injects captured carbon dioxide into concrete where it is permanently stored.

concrete.ai

Uses artificial intelligence to optimize concrete design.

EVERCAM

NEW - Captures and shares real-time safety and operational data through visual mobile documentation.

FORESIGHT
PEOPLE BUILD FASTER WITH AI

NEW - Provides an AI-powered project delivery platform that enables data center owners and contractors to accelerate builds, reduce risk, and deliver projects on time and on budget through predictive scheduling and real-time insights.

SINCE 1921 FOSTER FUELS

Produces alternative fuels, such as bio-diesel.

greenly

Provides software for automating carbon accounting and financial disclosures.

MANIFEST CLIMATE

Uses advanced analytics and machine learning to inform climate strategy and build climate competence.

OnsiteIQ®

NEW - Provides actionable insights to enhance the operational efficiency of multi-site critical facilities.

RADIX®

Provides actionable insights to enhance the operational efficiency of multi-site critical facilities.

SmartTagIt

NEW - Captures and shares real-time safety and operational data through visual mobile documentation.

TANGIBLE

Tracks, manages and reports on embodied carbon throughout the development and construction process.

APPENDICES



Appendix A: Details Behind our GHG Inventory

Note: GHG emissions are expressed in units of CO_2 equivalent.

This GHG emissions inventory is based on data from internal Compass metering, utility invoices, vendor data and client energy use. Greenly, a carbon reporting platform, provided appropriate emissions factors.

Whenever possible, measured data was used to calculate GHG emissions. Where data was unavailable, a consistent and rigorous estimation methodology was used. To normalize data, sites with limited data visibility were assumed to have constant electricity requirements year over year. All other emissions were estimated using customized average energy intensity values calculated in 2024 for power, diesel and refrigerant losses. This was deemed appropriate since Compass data centers are modular and have similar profiles.

The estimated energy use in 2024 was converted to GHG emissions using Greenly's emissions factors to maintain a standard methodology.

Scope 1 emissions

Boundary

Our scope 1 emissions include heating and refrigerant losses from our corporate offices in Dallas, Toronto and Dublin. Compass also included diesel emissions from backup generators and refrigerant loss for all its operating data centers.

Methodology

Greenly estimated the GHG emissions associated with heating and refrigerant losses for our corporate offices. These estimates are based on average consumption values for each region, using square footage and employee numbers. Diesel consumption for data center buildings was collected from internal meters. Estimates were made wherever data was not available, based on internal average consumption. Greenly's emissions factors were used to output emissions data. Refrigerant losses for data center buildings were determined using a combination of direct measurements and estimations. Compass uses the refrigerant gas R-410 A in all its HVAC units. Refrigerant line refills were tabulated to determine losses and calculate fugitive emissions according to the following equation:

Fugitive emissions (scope 1) *tCO_2e = kg of fugitive emissions x tons of CO_2 equivalent per kg of R-410 A*

Diesel emissions *tCO_2e = total diesel consumed (gal) x tCO_2e per gal of diesel*

Assumptions

Real utility data was not available for office locations, so Greenly's regional estimates based on square footage and employee count were used instead. Compass is working with its office space lessors to start sharing this data. Since it is currently impossible to distinguish between HVAC refrigerant line top-ups versus HVAC commissioning, Compass conservatively assumed all refrigerant fills were fugitive emissions. Wherever real data was unavailable, average fugitive emissions values were calculated based on existing data.

Scope 2 emissions

Boundary

Our scope 2 emissions include electricity consumption from our corporate offices in Dallas, Toronto and Dublin. It also includes electricity consumption from data centers before they're turned over to the client.

Methodology

Greenly estimated the GHG emissions associated with electrical use for the corporate offices. These estimates are based on average consumption values for each region, using square footage and employee numbers. Electricity consumed during data center operation was measured and tabulated in our ESG data mart.

Assumptions

Real utility data was not available for the office locations, so Greenly's regional estimates based on square footage and employee count were used instead. Compass is working with its office space lessors to start sharing this data.

Scope 3 category 2 emissions

Category 2 refers to the emissions associated with the production of goods and services that we purchased over the reporting period. For Compass, the vast majority of purchased goods and services are related to the construction of data centers. Therefore, our category 2 emissions refer to the product stage (lifecycle modules A1-A3) embodied carbon emissions associated with Compass' construction-related purchases.

Methodology

Scope 3 category 2 tCO_2e = sum of floor area constructed in reporting year x product stage embodied carbon per floor area[1]

Assumptions

- Product stage (A1-A3) embodied carbon intensity for data centers = 522 kg CO2e/m2 or 48 kg CO2e/ft2 [2]
- Embodied carbon emissions are estimated for structure and envelope.
- Data center construction spans multiple years. However, it is assumed that the structure and envelope, which generate the vast majority of embodied emissions in our scope of assessment, are completed within approximately the first year of construction. Therefore, all scope 3 category 2 emissions are calculated and included in the reporting year corresponding to the first year of construction.
    - For example, if construction begins in March 2024 and has a gross floor area of 2,000 ft^2, then the scope 3 category 2 emissions for that data center would be assumed to be: *2,000 ft^2 x 48 kg CO_2e/ft^2 = 96 tCO_2e*, all attributed to the 2024 reporting cycle.

Scope 3 category 13 emissions

Methodology

Power consumption for data center buildings was collected from internal meters, invoices and client power use data. Estimates were made wherever data was not available, based on internal average energy consumption. Greenly's emissions factors were used to output emissions data.

Electricity tCO_2e = total electricity consumed (kwh) x tCO_2e per kWh electricity

Assumptions

Data center turnover from Compass to its clients, along with the following IT use ramp-up, is a period of turbulent energy consumption. For the purposes of data consistency and to follow conservative reporting standards, we have included 2024 emissions related to data center commissioning.

Compass is working with its clients to increase data sharing, including for real-time IT loads. In building estimation methodologies, it was conservatively assumed that the IT capacity of data centers reached 100% after turnover to the client. This led to the functional MW unit, being the nameplate MW capacity of a data center or data hall multiplied by the percentage of the year it was operational. This was used to calculate power, diesel and refrigerant use estimates for data centers without data coverage.

Whenever a mismatch between utility bills and internal meters was found, the highest value of the two was chosen.

Data coverage

Compass does not have full data visibility of all data centers; certain buildings are managed independently by our clients. GHG emissions from these buildings were estimated for 2024. Compass is committed to engaging with its clients to increase data coverage.

1. "Floor area constructed" refers to the total floor area of the data center upon completion.
2. The emissions factor for scope 3 category 2 is taken from One Click LCA's Carbon Heroes Benchmarking database which provides embodied carbon benchmarks from thousands of buildings across various archetypes globally or by country.



Data centers done **differently.**

www.compassdatacenters.com