CODE OF PRACTICE FOR SUPPLIERS



STACK INFRASTRUCTURE

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1 Information

The STACK Code of Practice for Suppliers ("the Code") defines the non-negotiable minimum standards that we ask our suppliers and their sub-tier suppliers (together referred to as the "Supplier(s)"), to acknowledge and to adhere to when conducting business with STACK.

STACK strives to conduct business in a responsible manner and in order to make STACK's position clear to our Suppliers, we have set up this Code.

This Code helps the continued implementation of our commitment to international standards such as the 10 Principles of the United Nations Global Compact and United Nations Guiding Principles on Business and Human Rights, beyond our own operations.

This Code sets out three guiding principles on integrity and ethics in our business conduct underpinning STACK's commitment to responsible corporate citizenship and the pursuit of a sustainable future – economic, social and environmental.

a) STACK and its employees comply with the laws and regulations of the countries in which they operate,
b) STACK and its employees conduct operations with honesty, integrity and openness, and with respect for the human rights and interests of its employees, and
c) STACK expects its business partners, suppliers and sub-suppliers to follow business principles consistent with its own.

STACK will, when selecting Suppliers, in addition to other quality elements and commercial aspects, consider compliance with this Code.

The Code outlines a minimum standard of conduct. STACK expect that its suppliers always try to exercise good judgement, care and consideration by following both the requirements and the intentions of the Code.

Working together with our Suppliers STACK can offer best value for money service offerings to help our clients manage their day-to-day operations.

Through our offerings STACK can help clients reduce their environmental impact and energy costs while improving security and their regulatory compliance and the well-being of their employees and customers.

1.1 Our Mission

We at STACK are all committed to one common purpose:

"To provide customers with the most reliable and resource efficient IT-housing, enabling individuals, businesses and societies to carry out their critical digital activities."

1.2 Our Commitment

Trust, respect, honesty, transparency and professionalism are the foundation blocks of our relationship with everyone who interacts with our Company. To achieve this, STACK recognises that the behaviour of all our employees must meet the same high expectation, as this acts as the benchmark for our professional conduct. Our reputation is built upon integrity, honesty and acting responsibly whilst respecting the laws and regulations, traditions and cultures of the work environments within which we all operate.

1.3 Scope

The standards of the Code set forth expectations for the Supplier with whom STACK does business, including their parent, subsidiary or affiliate entities, as well as all others with whom they do business, including all employees (including permanent, temporary, contract agency and migrant workers). It is the Supplier's responsibility to disseminate, educate and exercise diligence in verifying compliance of this Code to its employees, agents and sub suppliers when relevant.

1.4 Compliance with Laws

All laws and regulations are complied with in the countries in which the Supplier operates. All other applicable international laws and regulations are complied with, including those relating to international trade (such as those relating to sanctions, export controls and reporting obligations), data protection and antitrust/ competition laws.

1.5 Application

Acknowledgement of the Code is a pre-requisite in every STACK contract for supply. Through the acceptance of the Purchase Order, referring to the Code, the Supplier commits that all its operations are subject to the provisions contained in this Code. This Code, or the demonstration of its compliance, does not create any third-party beneficiary rights for the Supplier. The standards of the Code are in addition to, and not in lieu of, provisions of any legal agreement or contract between suppliers and STACK.

1.6 Background Checks of Employees and Sub-contractors

All suppliers hired to work in STACK' customer modules/areas in the datacentres are required to undertake a suitable background check on their personnel needing access to the area.

2 Human Rights

STACK fully supports the United Nations Framework and Guiding Principles on Business and Human Rights and expects the Supplier to respect all human rights, including labour rights, throughout its business activities.

3 Safety and Health

A healthy and safe workplace is provided to prevent accidents, injury or illness arising out of, linked with, or occurring in the course of work or as a result of the employer's operations.

3.1 Health and Safety Management System

STACK operates a Health and Safety Management System and is certified to ISO 45001:2018 and encourages its Suppliers to document and implement a relevant environmental management system (based on international standards such as ISO 45001:2018), designed to identify, control and mitigate significant health and safety risks.

3.2 Risk Assessment and Method Statements

You are required to submit risk assessments and method statements (RAMS) in the following circumstances:

- Work at heights.
- Excavation Work.
- Demolition Work.
- Work at Confined Spaces.
- Construction Plant Work.
- Work involving Electricity, Highly Flammable Liquid Petroleum Gas and Chemicals.
- Works where specific site hazard exist, such as work near overhead power cables.
- Work requiring Manual Handling.
- When directed by a STACK Representative.

Work shall not start until RAMS have been submitted to your STACK's point of contact and you have been given permission for work to start. No deviations are allowed from the issued permit and your submitted Risk and Methods Statements.

You must ensure that all personnel under your control are provided with adequate information, instruction and supervision.

3.3 Workplace Environment

The Supplier shall provide its employees with a safe and healthy working environment. As a minimum, potable drinking water, adequate lighting, temperature, ventilation, sanitation, and personal protective equipment must be provided together with equipped workstations.

Adequate steps shall be taken to prevent accidents, fires and injuries arising out of, associated with, or occurring in, the course of work, by minimising, the causes of hazards inherent in the working environment.

Workers shall receive relevant and documented health and safety training, and such training shall be repeated on a regular basis.

In addition, facilities must be constructed and maintained in accordance with the standards set by applicable laws and regulations.

3.4 Emergency Preparedness

The Supplier shall be prepared for emergency situations. This includes worker notification and evacuation procedures, emergency training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, and adequate exit facilities. The Supplier shall regularly train employees on emergency planning, responsiveness as well as medical care.

3.5 Product Quality and Safety

All products and services delivered by the Supplier must meet the quality and safety standards required by applicable law. When conducting business with or on behalf of STACK the Supplier must comply with the STACK's specifications requirements in the relevant contract documents and are safe for their intended use, including the Suppliers workers.

4 Environmental Sustainability

STACK is committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business. STACK will work in partnership with others to promote environmental care, increase understanding of environmental issues and disseminate good practice.

Measures to minimize adverse impacts on human health and the environment shall be taken throughout the value chain. This includes minimizing pollution, promoting an efficient and sustainable use of resources, including energy and water, and minimizing greenhouse gas emissions in production and transport. The local environment at the production site shall not be exploited or degraded. Relevant discharge permits shall be obtained where required.

STACK is committed to Sustainability practices and that these sustainable practices are also embedded across its Supplier's operations and activities which aim to:

a) reduce the generation of waste and achieve zero landfill.
b) reduce greenhouse gas emissions and achieve carbon neutral solutions.
c) reduce the consumption of water.
d) protect and enhance nature and biodiversity; and
e) halt deforestation.

The Supplier shall establish a plan for reduction of environmental impacts, as well as follow-up and document the work. This includes the use of resources, e.g., raw materials, energy and water, as well as emissions from the operations.

STACK requires its Supplier to comply with all applicable legal environmental requirements and to seek continual improvement of its environmental performance though innovative solutions.

4.1 Environmental Management System

STACK operates an Environmental Management System and is certified to ISO 14001:2015 and we encourage our Suppliers to document and implement a relevant environmental management system (based on international standards such as ISO 14001), designed to identify, control and mitigate significant environmental impacts.

4.2 Hazardous Materials and Product Safety

The Supplier shall identify hazardous materials, chemicals and substances, and ensure their safe handling, movement, storage, recycling, reuse and disposal. All the applicable laws and regulations related to hazardous materials, chemicals and substances shall be strictly followed. Supplier shall comply with material restrictions and product safety requirements set by applicable laws and regulations. Suppliers shall ensure that key employees are aware of and trained in product safety practices.

5 Information Security

Information is one of STACK's most valuable business assets. STACK is committed to safeguarding and protecting our information and any other information entrusted to us.

5.1 Information Security Management System

STACK operates an Information Security Management System and is certified to ISO 27001:2015. We encourage our Suppliers to document and implement a relevant Information Security management system (based on international standards such as ISO 27001), designed to identify, control and mitigate significant Information security risks.

5.2 Protecting STACK's Information

Information within STACK is held in many different formats, including on paper, electronically in documents or in IT applications & systems. Our requirements to protect information apply to all formats. STACK has data classification standards which define how information within STACK must be classified, handled and protected.

When handling STACK's information Suppliers shall ensure that:

- They consider the nature and classification of the information, understand the handling requirements for information and take personal responsibility for the proper use, circulation, retention, protection and disposal of STACK's information.

- They only distribute or share STACK's information on a need-to-know basis, ensuring that only STACK's employees or others working for STACK, or authorised third parties by STACK, with a genuine business need, have access to the information.
- They take care not to disclose STACK's information in public places, including taking all necessary steps to protect documents and IT devices away from the workplace.

When handling STACK's information Suppliers shall not:

- Disclose STACK's information externally to other third parties unless in accordance with STACK's data classification standards; or
- Use STACK's information for anything other than a legitimate business purposes or as required by law.
- Transfer data outside the country in which it is collected, without advice from their Legal business partner and explicit consent from STACK.

If in doubt about how to handle any STACK's information, restricted or otherwise, Suppliers must seek advice from their STACK Representative.

5.3 Use of Information Technology

Information Technology- (IT) – including desktops and laptops, mobile devices, networks, software, email, data, business applications and internet/intranet – are critical to our operations. This policy explains what Suppliers need to do to ensure the responsible and secure use of IT in STACK, including compliance with all relevant laws and regulations.

The Suppliers shall ensure the responsible and secure use of IT in STACK, applying

the same personal and professional standards as for any other business activity when using the internet, intranet, social media, messaging and email.

When using STACK's IT, Suppliers shall ensure that:

- They only use credentials allocated to them.
- They keep passwords confidential.
- They ensure any additional software or storage is approved and appropriately licensed.
- They obtain express permission from any employee before posting or publishing personal information about them.
- When using social media, they are clear about whether they are acting in a personal or professional capacity.
- They immediately report any suspected or confirmed misuse of STACK's IT through correct internal channels.

When using STACK's IT Suppliers shall not:

- Try to disable, defeat or circumvent standard security features.

- Access, store, send, post or publish material that is pornographic, sexually explicit, indecent or obscene, or that promotes violence, hatred, terrorism or intolerance.
- Defame, slander or lower the reputation of any person or entity or their goods or services.
- Delete, destroy or modify existing systems, programs, information or data without appropriate authorisation.

STACK may, to the extent permitted by law, log, monitor, record, /or remove material to comply with legitimate requests to disclose such material to local law enforcement, regulatory agencies or judicial authorities.

6 Business Integrity

The Supplier shall comply with applicable laws concerning bribery, corruption, fraud and any other prohibited business practices. The Supplier shall not offer, promise or give any improper benefit, favour or incentive to any public official, international organisation or other third party.

6.1 Bribery

There is a prohibition on any and all forms of bribery, corruption, extortion or embezzlement and there are adequate procedures in place to prevent bribery in all commercial dealings undertaken by the Supplier.

6.2 Conflicts of Interests

All and any conflict of interest in any business dealings with STACK, of which the Supplier is aware, will be declared to STACK to allow STACK the opportunity to take appropriate action. Any ownership or beneficial interest in a Supplier's business by a government official, representative of a political party or a STACK worker are declared to STACK prior to any business relationship with STACK being entered.

6.3 Gifts and Hospitality

Any business entertaining or hospitality with STACK is kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way STACK's decisions about how STACK awards future business. Gift giving should occur sparingly and always be legitimate and aligned with company policies.

6.4 Financial Records, Money Laundering and Insider Trading

All business and commercial dealings are transparently performed and accurately recorded in the Supplier's books and records. There is no actual or attempted participation in money laundering. No confidential information in the Supplier's possession regarding STACK is used to either engage in or support insider trading.

6.5 Reporting Concerns and Non-retaliation

STACK recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisals from those responsible for the malpractice. STACK will not tolerate any ensuing harassment or victimisation and will take all possible measures to protect employees who raise concerns in good faith.

STACK has therefore arranged for a Whistle-blower Service for all workers (whether directly employed or not) to provide the means to raise their concerns about any of these requirements and processes. Our Whistle-blower Service are in place to ensure that workers who raise concerns and speak up in good faith are protected from retaliation.

There are four alternative ways to file a report:



On the Internet:

[Click here]



By mail:

Ernst & Young AS, Att: FIDS
Postboks 1156 Sentrum

NO-0107 Oslo

NORWAY



By phone:

+47 24 00 20 14

Business days from 8 am to 4 pm

QR-code to web form

Use a mobile device (e.g. cell phone

The whistleblowing channel is administrated by Ernst & Young AS (EY). As an independent third party EY receives the report on behalf of STACK and gives advice on further action.

7 Evaluation

STACK expects that the Suppliers continuously and systematically evaluate their compliance with this Code. STACK furthermore expects that improvement measures, whenever needed, are implemented by the Suppliers. STACK will also continuously evaluate and, if needed, improve its policies and purchasing practices in order to facilitate the Suppliers' and their sub suppliers' compliance with this Code.