

## Norwegian Transparency Act Statement 2024

### Introduction

STACK is a trusted global partner in digital infrastructure, delivering scalable, AI/ML and Cloud data center solutions to tackle global challenges with speed, scale, certainty, and responsibility. With a client-first focus, conscientious development and operational practices, we empower innovative companies to tackle their demand curve.

We prioritize innovative design and advanced engineering to provide a solution our clients need. We also know it's important to be a responsible member of the communities in which we operate while supporting client principles. This combination allows us to build resilient infrastructure that supports long-term client success, meets evolving technological demands, and fosters local partnerships.

### Structure

Infrastructure Norway I AS (Reg. No. 932059207) is the parent company of STACK Norway, the Norwegian subgroup of STACK EMEA, headquartered in London, UK. The Chief Executive Officer of STACK EMEA is based at the organization's head office in London.

STACK Norway's main office is located at Ulvenveien 82E in Oslo. The subgroup has a total of 64 employees, of whom 25 are based at the Ulven office.

STACK Norway operates four data center campuses in Norway:

- OSL01 (Ulven, Oslo)
- OSL02 (Rosenholm, Nordre Follo)
- OSL03 (Fetsund, Lillestrøm)
- OSL04 (Holtskogen, Indre Østfold)

Each data center campus has up to 10 on-site employees.

STACK holds the certifications ISO 9001, ISO 14001, ISO 45001, and ISO 27001, SOC2 and PCI DSS, across the business which requires conscious and systematic efforts on quality, working environment, external environment, and information security. Our quality system is regularly updated to ensure compliance with applicable laws and regulations.

STACK enforces a culture of engagement and integrity. Our 2024 Impact Report compiles some of the following engagement to promote decent working conditions for all our employees and supply chain.

[Copenhagen](#) | [Frankfurt](#) | [Geneva](#) | [London](#) | [Milan](#) | [Oslo](#) | [Stockholm](#) | [Zurich](#)



## People and Culture

### Employee Engagement

Through thoughtful engagement at all levels, attracting and retaining the best talent strengthens STACK's culture and service delivery. We take pride in our comprehensive benefit, professional development, and team-building programs, which enhance the employee experience.

### Leadership Approach

Foster a culture of leadership where individuals at every level are empowered to lead with purpose, integrity, and a commitment to growth, building a resilient, innovative organization.

### Business Integrity

Doing business with integrity, enforcing a zero-tolerance policy on conflicts of interest and other ethical violation

## Health and Safety

### Design

STACK integrates risk-reduction into its designs, aiming to eliminate hazards through engineering and controls from the project's start.

### Construction

Facilities are designed with hazard mitigation in mind, supported by strict contractor pre-qualifications and regular safety inspections during construction. We maintain robust physical and digital security protocols to protect our infrastructure and client data.

### Operations

Daily operations follow detailed policies, reinforced by routine inspections, recurring training, and active employee engagement.

## Codes of Conduct

We work closely with Norwegian and Nordic suppliers if possible. All other purchases are made by companies registered with the EU and the EU standards concerning fundamental human rights and safe and healthy working environment.

To abide by The Norwegian Transparency law, as well as all applicable laws where STACK operates, we have introduced ethical guidelines applicable in all STACK locations, including the STACK Code of Business Principles and STACK Supplier Code of Conduct, which stipulates, among other things, requirements for orderly working conditions, compliance with human rights, ethics, and the environment.



## Supply Chain

We are committed to ethical sourcing and responsible supply chain management. Our policies ensure:

- Due diligence in selecting suppliers who uphold fair labour practices and comply with international human rights standards.
- Regular audits and assessments to verify working conditions and environmental practices across our work sites and supply chain.
- Zero tolerance for forced labour, child labour, or unsafe working environments.
- Transparency in procurement processes, with preference given to suppliers who demonstrate strong sustainability performance.
- Our supply chain presents a relatively low risk, as we purchase products and services mainly from Norway or neighbouring countries within the European Economic Area.
- We are careful to avoid sourcing from high-risk countries and carry out thorough KYC checks on all our partners.
- We carry out regular risk assessments on our operations and do our best to reduce the impact of our activities and offset those that cannot be eliminated through positive, proactive measures.
- As members of the United Nations Global Compact, we monitor our operations to ensure there is always room for improvement and make positive contributions to the community and our stakeholders.

## Sustainability

STACK is committed to operating data centers using 100% renewable power.

We have bee hives on 2 out of 3 sites in Oslo supporting biodiversity and promoting pollination in our operating regions.

We have installed rainwater harvesting systems on OSL03 and OSL04 enabling further reductions in potable water.

We design all new data centers with closed loop systems to reduce water usage. We are committed to reducing energy and water usage on site by close monitoring systems and regular reviews of systems performance and operations. We carry out preventative maintenance to avoid refrigerant leakage and lengthen the life of our equipment, reducing the whole life cycle carbon for our sites.

We re-use waste heat where possible: for example, OSL03 re-use waste heat as a snow melt system to clear the roadway to the loading bay from the main entrance.



All our Nordics sites will complete transition to HVO100 in the next 3 years.

### **STACK Whistleblowing Policy & Channel Access**

STACK recognises that the decision to report a concern can be a difficult one to make. It is important to us that employees feel safe and supported when raising concerns. Therefore, STACK takes all possible measures to protect employees, suppliers and collaborators.

STACK has arranged a dedicated Whistleblower Service, managed by an independent third-party organization. This service provides a confidential and secure channel for reporting any suspected misconduct or unethical behaviour.

Oslo, 30 June 2025

Infrastructure Norway I AS

Åge Hellem

Chair of the BoD