

STACK Infrastructure

Type of Engagement: Green Financing Pre-Issuance Review

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Engagement Team:

Amala Devi, amala.devi@sustainalytics.com, (+1) 416 861 0403

Sameen Ahmed, sameen.ahmed@sustainalytics.com

Introduction

In October 2023, STACK Infrastructure (“STACK” or the “Issuer”) developed the STACK Infrastructure Sustainable Finance Framework (“the Framework”) under which it aims to pursue a secured green collateral financing associated with a specified portfolio of data center leases (the “Specified Leases”). Sustainalytics provided a Second Party Opinion on the Framework in October 2023.

In October 2023, STACK engaged Sustainalytics to review the assets underlying the Specified Leases (the “Nominated Projects”) and provide an assessment as to whether the projects would comply with the use of proceeds, project selection, and management of proceeds sections of the Framework.

Evaluation Criteria

Sustainalytics evaluated the Nominated Projects that will be funded through the contemplated financing for compliance based on whether:

1. The Nominated Projects are aligned with the use of proceeds eligibility criteria outlined in the Framework; and
2. The commitments to select projects and manage proceeds on allocation and impact in order to ensure that these commitments are aligned with the ones described in the Framework.

The Nominated Projects are summarized in Appendix 2.

Issuing Entity’s Responsibility

STACK is responsible for providing accurate information and documentation relating to the details of the Nominated Projects, including a description of the eligible projects within each eligible category. This information was provided to Sustainalytics to support its review. STACK is also responsible for confirming to Sustainalytics that processes for project selection and management of proceeds for the contemplated financing will remain aligned with the commitments described in the Framework.

Independence and Quality Control

Sustainalytics, a leading provider of ESG and corporate governance research and ratings to investors, conducted the verification of the Nominated Projects and the contemplated financing. The work undertaken as part of this engagement included verification of the Nominated Projects and confirmation from relevant employees of STACK that the use of proceeds, processes for project selection and management of proceeds for the contemplated financing will remain aligned with the commitments described in the Framework.

Sustainalytics has relied on the information and the facts presented by STACK with respect to the Nominated Projects. Sustainalytics is not responsible nor shall it be held liable if any of the opinions, findings, or conclusions it has set forth herein are not correct due to incorrect or incomplete data provided by STACK.

Sustainalytics made all efforts to ensure the highest quality and rigor during its assessment process and enlisted its Sustainability Bonds Review Committee to provide oversight over the assessment of the pre-issuance review.

Conclusion

Based on the limited assurance procedures conducted,¹ nothing has come to Sustainalytics' attention that causes us to believe that, in all material respects, the Nominated Projects and the contemplated financing are not aligned with the Framework.

¹ Sustainalytics limited assurance process includes reviewing the documentation relating to the details of the projects that have been funded, including description of projects, estimated and realized costs of projects, and project impact, which were provided by the Issuer. The Issuer is responsible for providing accurate information. Sustainalytics has not conducted on-site visits to projects.

Appendix 1: STACK’s Use of Proceeds Eligibility Criteria

In October 2023, STACK developed the Framework under which it may issue or obtain unsecured or secured green, social or sustainability bonds or loans, including, among others, asset-backed securities and collateralized loan obligations and use the proceeds to finance or refinance, in whole or in part, existing or future projects that meet designated eligibility criteria. The only eligibility criteria applicable for the purposes of this letter are set forth below:

Project Category	Eligibility Criteria
1. Energy Efficiency	<p>Expenditures and investments related to:</p> <ul style="list-style-type: none"> • Design, construction, certification, operation and maintenance of data center buildings that have, or are expected to have, relevant green building certification or energy ratings set forth below: <ul style="list-style-type: none"> ○ LEED: Gold or Platinum ○ BREEAM: Excellent or Outstanding ○ Green Globes: 3 or 4 Globes ○ ENERGY STAR: ENERGY STAR score of 85 or greater for building categories not eligible for ENERGY STAR certification • Design, construction, certification, operation and maintenance of existing and operational data centers with a power utilization efficiency (“PUE”) ratio not more than 1.5

Appendix 2: Summary of the Nominated Projects

As of October 2023, the list of Nominated Projects include:

Use of Proceeds Category	Energy Efficiency
Geographic Location	United States
Project Description	<p>The Nominated Projects include the following:</p> <ul style="list-style-type: none"> • Seven data centers with operational PUE of 1.5 or less, where the PUE is calculated on a 12-month rolling average basis using the most recently available data: <ul style="list-style-type: none"> ○ 394 Pacific DCP ABS, LLC ○ SI ATL01A ABS, LLC ○ SI CHI01A ABS, LLC ○ SI DFW01A ABS, LLC ○ SI POR02 ABS, LLC ○ SI SVY01A-B ABS, LLC ○ SI NVA01 ABS, LLC; and • One LEED Gold certified data center building: <ul style="list-style-type: none"> ○ SI NAL01A ABS, LLC

Appendix 3: Sustainalytics' Findings

Eligibility Criteria	Procedure Performed	Factual Findings	Error or Exceptions Identified
Use of Proceeds Criteria	Verification of the Nominated Projects (Appendix 2) to determine if the projects aligned with the use of proceeds eligibility criteria outlined in the Framework (Appendix 1).	All Nominated Projects reviewed (Appendix 2) complied with the use of proceeds eligibility criteria.	None
Project Selection and Management of Proceeds Criteria	Verification of the Nominated Projects to determine if the commitments under processes for project selection and management of proceeds were consistent with the Framework.	STACK has also confirmed to Sustainalytics that the processes for project selection and management of proceeds for the contemplated financing are consistent with the commitments described in the Framework.	None

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The issuer is fully responsible for certifying and ensuring the compliance with its commitments, for their implementation and monitoring.

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