



OUTCOMES

Different by Design. Accountable by Nature.

Compass Datacenters Report 2026

About this Report

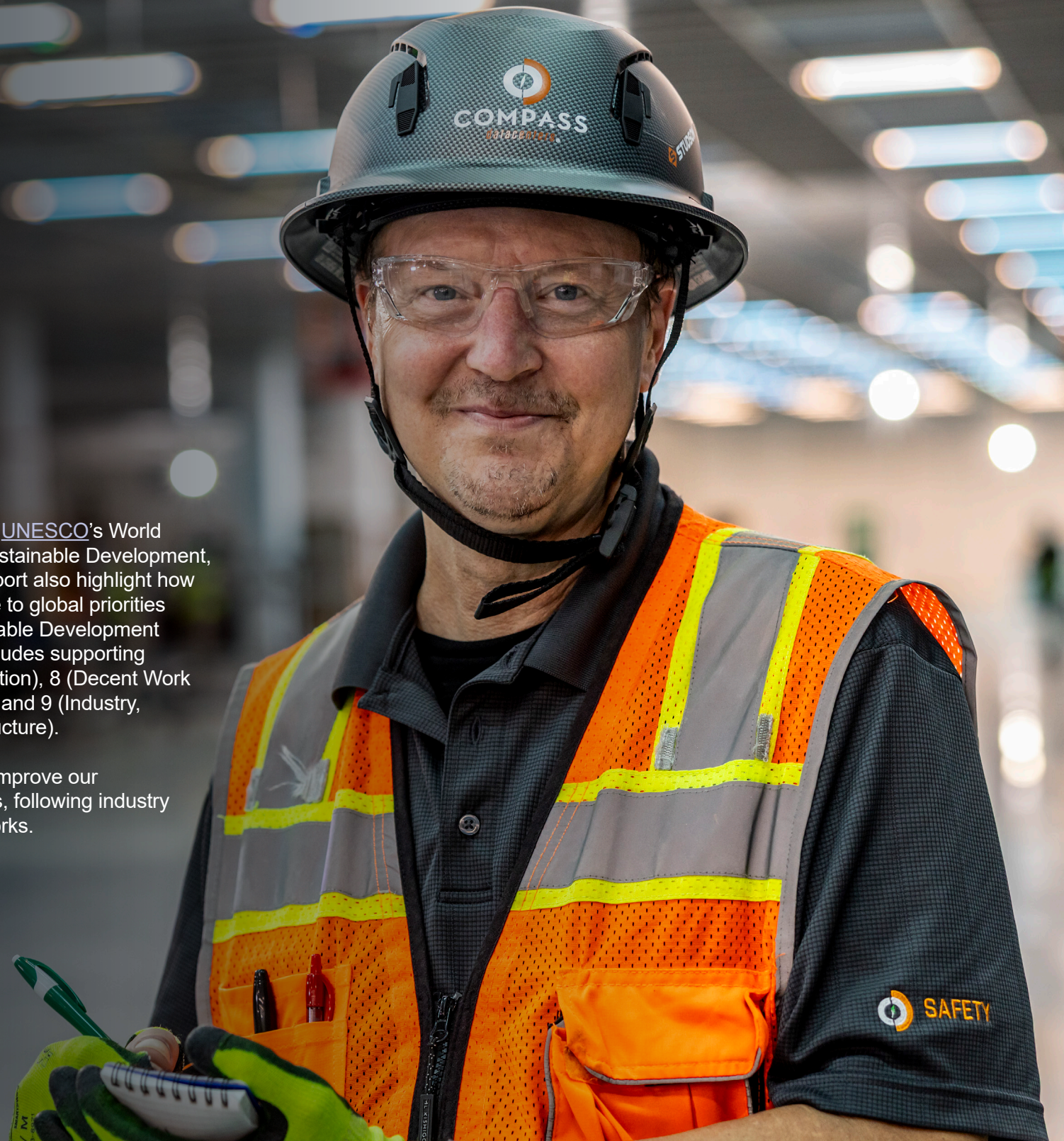
This is Compass Datacenters' fourth annual disclosure report on environmental, social and corporate governance (ESG) topics.

Produced by Compass' Executive Leadership Team with support from third-party climate consultant, Mantle Climate, this report has been prepared following the guidance of these three sustainability frameworks: 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 2025 year.

As an official partner of [UNESCO's](#) World Engineering Day for Sustainable Development, the outcomes in this report also highlight how our initiatives contribute to global priorities reflected in the Sustainable Development Goals (SDGs). This includes supporting SDGs 4 (Quality Education), 8 (Decent Work and Economic Growth) and 9 (Industry, Innovation and Infrastructure).

We aim to continue to improve our reporting in future years, following industry standards and frameworks.

Find out more at
compassdatacenters.com/outcomes/



CEO Letter

Built to Last: Building More Than Data Centers in Local Communities

In recent months, some might say years, the conversation around data centers has shifted in stride with the scale and speed at which the industry is expanding. It's no longer just about bits and bytes; it's about long-term impact to the people and places that open their doors to our developments.

As we examine Outcomes in 2025, we've taken time to reflect on what it means to make lives better and reflect on how we're doing that.

The answer starts with this prevailing perspective: We are investing in more than just concrete and servers, we are investing in the long-term well-being of the community. Our desire is to see the communities we call home grow increasingly connected, resilient and vibrant. We do that through acute focus and delivery of a high-quality economic engine that will endure for generations.

Focus

Compass' focus on large-scale campuses is at the heart of our quality over quantity value proposition. Rather than building dozens of small campuses all over the map, we build large-scale campuses that deliver long-lived value. Because our footprint is concentrated, our focus on our neighbors is as well. We're all in, building relationships, partnerships and programs that endure for decades.

Quality

At Compass, we hold ourselves to a Class A developer standard — because while it is not an industry designation, it is a reflection of how we operate and the values we hold. A “long-lived” campus inherently requires a different approach to investing, not just in the building itself, but also [in the community](#). When we enter a

community, we aren't just passing through. We're making a massive, decades-long commitment to a specific piece of land and a specific group of people. Therefore, we invest in quality products and quality of life to be purpose-driven for generations.

Enduring

“Built to last” isn't just a construction standard — it's our social contract. This philosophy changes how we show up. From daily operations to building long-term jobs through workforce programs, we want the communities around us to thrive, not just for a few years, but for decades to come. We see our success as being inextricably linked to the enduring success of the regions we call home.

As you read through this year's Outcomes Report, I hope you see more than just metrics. I hope you see a company that understands its scale and meets it with an equal measure of responsibility. We are building for the next 100 years, and we're doing it one neighborly decision at a time.

Chris Crosby
CEO, Compass Datacenters



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** 2025 Key Metrics and
Progress **10** Innovation **22** Environment
42 Social **64** Governance **73** Appendices



Look out for “Measured in Outcomes” pages showcasing testimonials and case studies demonstrating the outcomes behind our work.

Contents

About Compass

Compass Datacenters does data centers differently. The company develops and operates sustainable Class A, Community-First campuses guided by a 100-year neighbor philosophy that invests in the workforce, infrastructure, and well-being of every community it calls home. Backed by the institutional strength of Ontario Teachers' Pension Plan, Brookfield Infrastructure and KKR, Compass delivers high-quality facilities at speed for the cloud

and hyperscale customers driving today's economy. By combining industrialized, prefabricated design with advanced hybrid cooling that uses no water during operations, responsible energy use, and zero-waste construction, Compass takes a more sustainable approach to digital infrastructure supporting the company's built-to-last vision. The result is move-in ready capacity that scales efficiently and responsibly. Data Centers Done Differently.



ESG at Compass

Because community impact is a core part of how we operate, ESG is not a separate initiative or reporting exercise. It’s how we run the business. We choose to measure, disclose and hold ourselves accountable because we believe doing the right thing is foundational to building infrastructure that lasts for communities that thrive. Our approach to ESG reflects who we are as a company: long term thinkers, disciplined builders and committed members of the communities where we operate.

As a long term owner and operator, our environmental, social and governance decisions are made with the understanding that our campuses are part of larger systems: local economies, ecosystems and neighborhoods that must remain strong long after construction is complete. This perspective shapes how we design, how we build and how we show up as a neighbor, prioritizing durability, safety and shared benefit over short term gains.

We don’t pursue ESG to check boxes or meet minimum expectations. We pursue it because embedding these principles into our day to day decisions leads to better outcomes for our people, our partners, our customers and the communities we serve. That commitment is grounded in four core pillars that guide how we operate:

Sustainability

- Embedded into every phase of our design, delivery and operations

Innovation

- Investing in our people and partners to make lives better

Integrity

- Operating transparently, because trust is our foundation

Accountability

- Holding ourselves to always do the right thing

These pillars reflect our belief that responsible development and being a part of strong communities are inseparable. By investing upfront, operating transparently and holding ourselves to a higher standard, we aim to deliver long term value that extends beyond our campuses and contributes to resilient, thriving places for generations to come.

Our core convictions 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 – by clearing the air with colleagues quickly.



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.



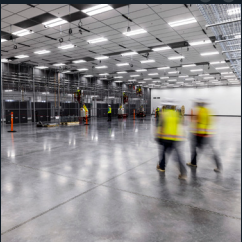
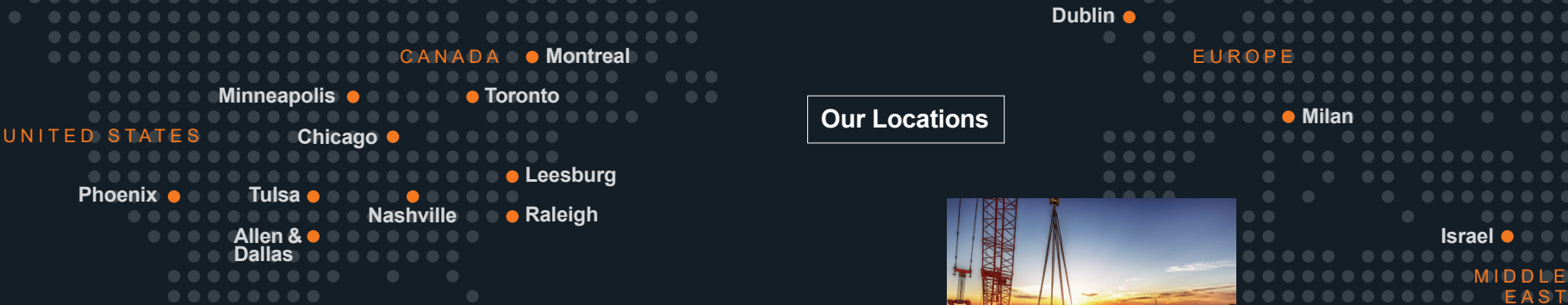
We Ask “Why?”

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

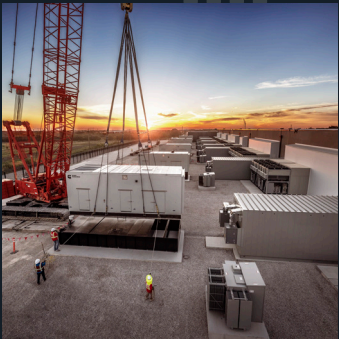
How We Operate

We are long-term owners and operators of data centers, leasing to the largest technology companies in the world. Once our campuses are delivered to our customers, they take control of the activities that drive electricity emissions onsite. In accordance with the Greenhouse Gas (GHG) Protocol, these emissions become their scope 1 and 2 emissions and our scope 3 category 13 emissions. As a result, our total scope 1 and 2 emissions are only a small portion of the emissions generated at our sites.

Our outcomes are driven by our core convictions, driving us toward continuous improvement and greater innovation every day. With this, our manufacturing mindset allows us to find efficiencies and positive outcomes in non-traditional ways across environmental, social and corporate governance (ESG) realms. This enables us to prioritize new ways of working to ensure we are good neighbors as long-term operators.



Corporate:
Dallas, Dublin
& Toronto



Materiality

At Compass, we approach materiality through a dual lens; examining not only how environmental, social and governance factors affect our business, but also how our decisions and operations affect people, communities and the environment over the long term. This concept, often referred to as double materiality, ensures we focus on the issues that matter most to sustained performance, trust and resilience.

In 2022, Compass 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 process, we identified 42 material topics relevant to the data center industry. We incorporated into a broad stakeholder survey that engaged our Executive Leadership Team, employees, suppliers, peers and ESG rating and ranking organizations. The results were compiled into a stacked materiality ranking that highlighted the issues most critical to our stakeholders and strategic direction. Based on these findings, our leadership team prioritized action on the seven topics that emerged as significantly more material than the remaining set. These priorities continue to form the foundation of our near-term ESG strategy. We plan to conduct an updated materiality assessment in the near term to ensure our

Priority Material Topics

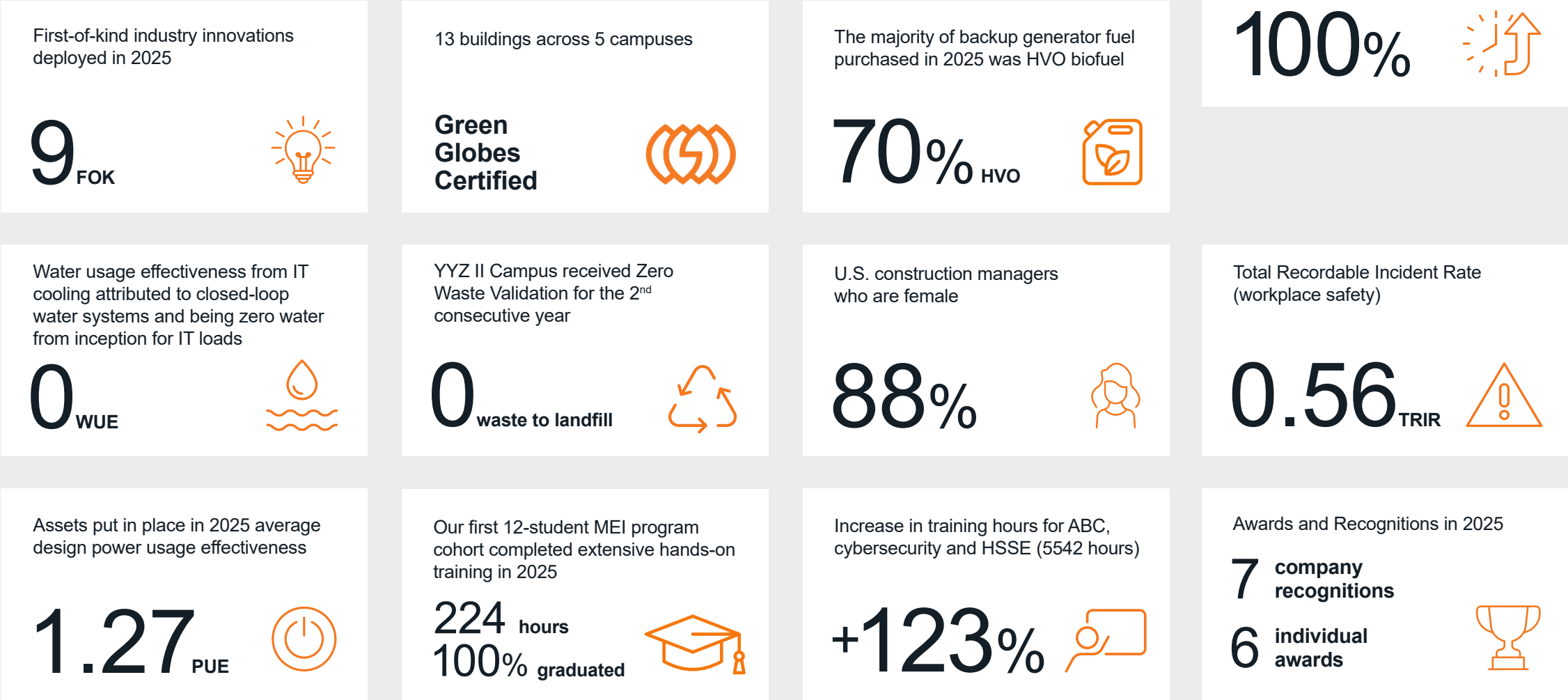
- 01. Emissions
- 02. Diversity
- 03. Employee health and safety
- 04. Energy
- 05. Business ethics and integrity
- 06. Materials sourcing and efficiency
- 07. Water and wastewater

Since conducting this assessment, we have been working on addressing these seven topics. Some highlights can be found in this report. While we focus near-term action on our highest-priority topics, we remain committed to monitoring and addressing the full set of material issues over time through transparent reporting and continuous improvement.

We aim to ensure our materiality process remains grounded in real-world impacts, supporting responsible growth, long-term value creation and thoughtful stewardship in the communities and systems where our campuses operate. Compass anticipates revisiting its materiality assessment in the near-term to ensure our priorities remain relevant and responsive to what matters most.



Key Metrics and Progress





Innovation



Innovation

Innovation at Compass is foundational to how we work, not a separate department or initiative. As long-term owners and operators of every campus we build, we live with the consequences of every decision we make. That shapes how we think about what to try, what to keep and what actually worked.

How we design, build and operate matters as much as what we deliver. We invest upfront, refine continuously and keep what works. Our manufacturing-informed approach moves work out of the field and into controlled environments, protecting our people and producing repeatable, reliable outcomes. When something performs, we replicate it across our portfolio.



Innovation Driving Outcomes

We concentrate our innovation thinking across five areas that shape every phase of a campus lifecycle:

Together, these areas ensure our curiosity produces outcomes, not just experiments. In 2025, that foundation held: 100% uptime across all Compass sites.



Use of technology

We adopt tools that make our campuses smarter and our decisions more measurable across the full life of the asset.



Product selection

We choose materials and systems that are proven, durable and optimized for the long term, reducing rework, waste and downstream maintenance.



Means and methods

Our controlled construction model reduces on-site risk and creates more predictable outcomes for our teams, partners and projects.



Design decisions

Standardized, modular designs give us consistency, speed and adaptability without reinventing the wheel at every site.



New business models

We're rethinking how we structure and scale relationships, because innovation isn't only what we build, it's how we operate.

Standardization

[Our manufacturing approach](#) is foundational to how we build and how we deliver lasting value. By standardizing our products and data center components, we deliver:



Mass customization



Lowest total cost of ownership



Innovation



Fastest-to-ready deployment

In 2025, by implementing our manufacturing mindset, we have seen more sustainable outcomes in products, safety and operations.



Moonraker

We are proud to have launched our updated Moonraker this year. Now deployed uniformly across new campuses, the Moonraker reflects everything we've learned from previous models and the innovations we've tested along the way. The benefits are now being mass deployed across our growing portfolio. This standardized product is 84% fabricated offsite, giving us the flexibility to adapt and improve as we go. Because our buildings are componentized and manufactured, they can be updated or replaced far more easily than traditional construction. The approach is also quieter, with less dust and traffic on site, benefitting the communities where we build.

Photo: The Compass Moonraker is a standardized reference design that allows Compass to continuously refine and improve how data centers are built, driving better delivery timelines, stronger sustainability outcomes and safer, less disruptive construction with every iteration.





CoolPhase Flex Installations

Last year, we collaborated with Vertiv to develop the [Vertiv™ CoolPhase Flex \(DH400\)](#) — a hybrid unit capable of supporting both liquid and air-cooling. This year, we successfully deployed these units across multiple buildings with zero impact on our existing equipment yard design or prefabricated kit-of-parts. This level of innovation allows us to provide unmatched standardization and fungibility, delivering cost and labor efficiencies without requiring infrastructure overhauls. That's the goal of a manufacturing approach: innovation that fits the existing standard, scales cleanly and doesn't force a redesign every time something improves.

Photo: Developed in under a year, the Vertiv CoolPhase Flex embodies Compass' commitment to speed, scalability and customer-centric innovation. The system integrates dual-mode cooling — air and liquid — in a single modular unit.



Install Guides

In 2024, we launched our visual-first install guides for our general contractors to more easily install our prefabricated assemblies. We fully deployed install guides for our power centers, [Vertiv™ CoolPhase Flex](#) units, White Space Modules (WSM) and generators. This year, those investments delivered measurable outcomes:

- Early logistics coordination and transparency
- Lower labor hours and fewer people required per install
- Clearer scope separation that reduced gaps and duplicated effort during buyouts

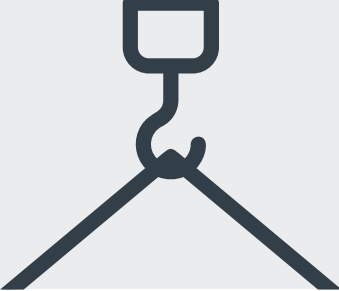
Photo: RK and Compass collaborated to create two innovative first-of-kind fabricated piping systems: the FWS and TCS pipe racks.



This year, in partnership with the Industrialized Construction Group (ICG), the leading industrialized construction consultancy, we ran a pilot time study on the installation of our prefabricated pipe racks, measuring labor hours and time savings against conventional construction. Ease of assembly is core to our manufacturing-informed approach, and the study gave us a clear, data-backed view of where to refine further. Those improvements will roll out across the portfolio next year.

See [page 21](#) for more information on the ICMA Platinum Medallion.

More Standardization Efforts & Outcomes



Prefabricated assemblies for liquid cooling

This year, we deployed our prefabricated pipe racks, water skid and white space module (WSM), making us able to handle various workloads across campuses. These assemblies support the Vertiv™ CoolPhase Flex and enable hybrid cooling for our customers. Because we build with standardized, industrialized components, we were able to pivot to liquid cooling faster than competitors still designing buildings monolithically.

Precast optimization

Working in close feedback loops with our closely-coupled manufacturing and installation partners, we optimized our precast production and transportation logistics to enable larger prefabricated assemblies for liquid-cooling and other prototype advancements. This work happened in 2025, with full deployment in 2026. In line with our design for manufacturing approach (DfMA), the result is reduced material use and the ability to design larger multi-trade assemblies, fewer pieces to handle on site, faster installation and a cleaner build.

First-of-kind (FOK) program

In 2025, we achieved 9 integrated delivery by executing our first-of-kind program for pipe rack, water treatment skids, ring main unit (RMU) transformer skids, white space module (WSM) and other components. This program enables us to design, develop, test and get upstream feedback and early alignment from our partners on new components and assemblies. We exercised our culture by using transparency and humility, bringing all stakeholders up front to maximize safety, ease of design, assembly, commissioning and operations.

Next year, we plan to build on our owner-furnished, contractor-installed (OFCI) FOK program for major equipment and assemblies. We plan to conduct cross functional, first install “Kaizen events” (a structured continuous improvement approach originating from Japanese manufacturing) at all campuses alongside our expanded work with the Industrialized Construction Group on time studies to understand how to deliver, install and commission fastest-to-ready with quality at the source.

Power center busway simplification

This 2025 product development was driven by our closely-coupled partners. We simplified our power center busway from six components to only two, reducing procurement complexity, minimizing potential failure points and accelerating installation timelines across sites.

Power distribution unit (PDU) optimization

With metering standardized between the main breaker and main disconnect, we saw cost savings and reduced coordination between them. This is an example of our manufacturing mindset, enabling mass customization: we chose a metering solution that provides options and is acceptable to all potential customers.

Medium voltage loop optimization

We standardized our medium voltage loop and cable specs across sites, improving consistency, reducing design variation and enabling faster procurement and construction execution.

Digital Pre-Commissioning

We are always looking for opportunities to avoid mistakes and correct any that happen sooner in our processes. In 2025, we completed our efforts to shift 80-90% of power centers onsite level 3 and level 4 activity (i.e., alarms and functional testing) to the factory, creating efficiencies across our power center manufacturing process. By doing so, we can address issues sooner and eliminate wasted time in the field through factory acceptance tests. We have eliminated 10 hours of work onsite per power center. With 40 power centers per building, that's 400 hours of work saved.

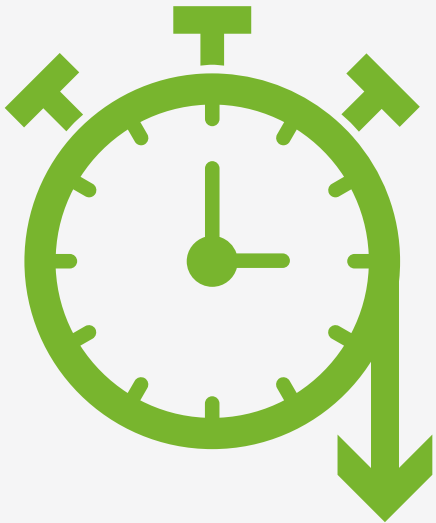
We're doing similar work with our Vertiv Vertiv™ CoolPhase Flex hybrid cooling units, where we now save 3 hours per unit. With 120 units per building, that's a 360-hour reduction per building.

We're also saving more time onsite and better using our team's time by digitizing checklists and inspection work. Working so closely with our partners allows us to save time and focus our efforts on other value-add activities.



400
HOURS

OF WORK SAVED
PER BUILDING

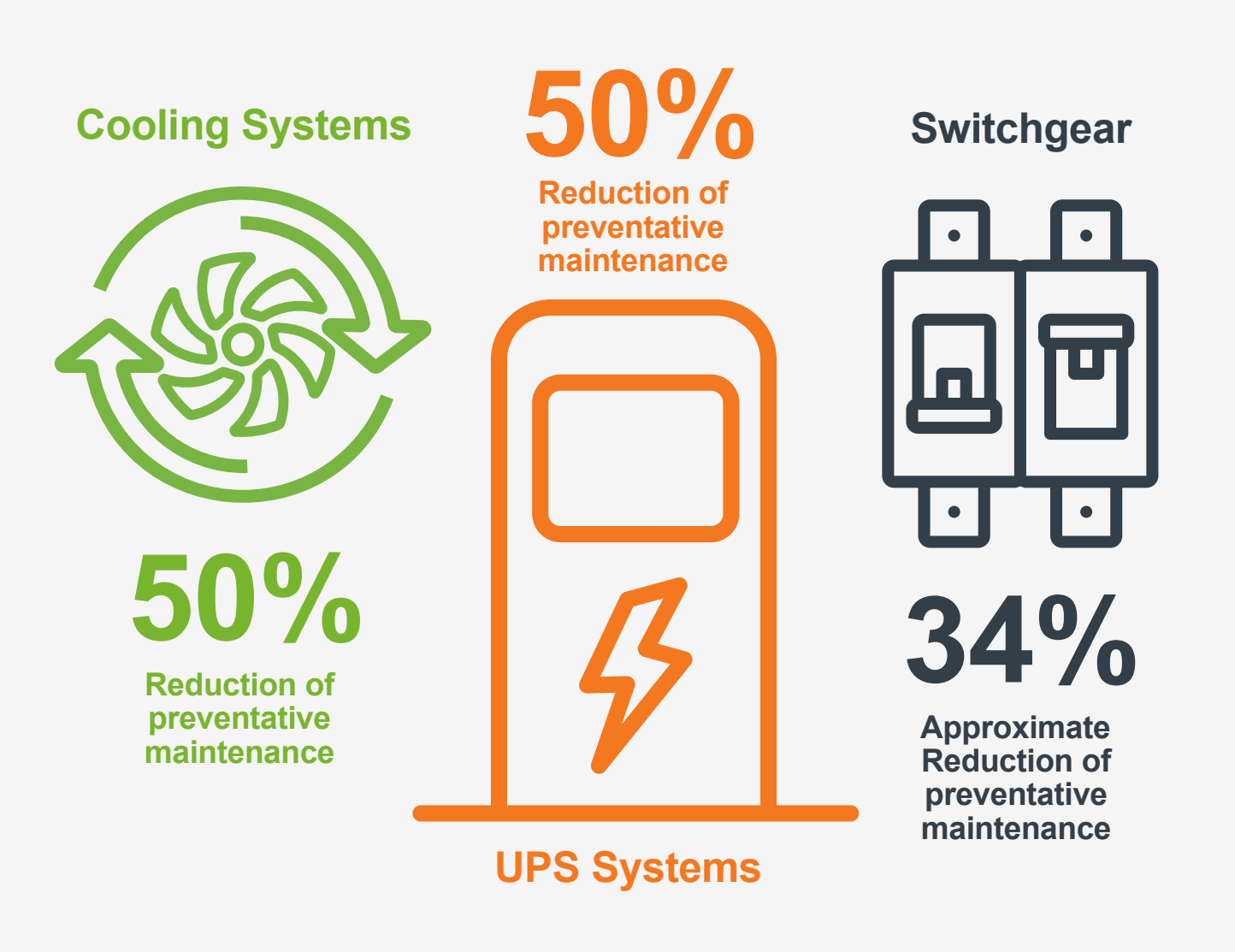


360
HOUR

REDUCTION
PER BUILDING

AI-powered predictive maintenance

Working with our partners, we’re rolling out [predictive maintenance](#) across our systems. Instead of servicing equipment on a fixed schedule, we only service it when data tells us it needs attention. Moving away from calendar-based schedules toward predictive and condition-based analytics that tell us when equipment actually needs attention. The practical effect is that we touch hardware only when necessary, which extends server lifecycles and reduces unnecessary replacements and waste. This approach highlights the efficiency gains and reduced service frequency enabled by condition-based maintenance without compromising system reliability. The numbers bear this out:



Without real-time visibility into how our equipment is actually performing, these inefficiencies would have stayed invisible. Beyond the cost savings, catching early warning signs before they turn into failures has changed how we approach maintenance entirely. It is now a predictive discipline built into our operations, not a reactive response to problems that have already surfaced.

Centralized warehouses

In 2024, we partnered with MEI Industrial Solutions at our PHX campus to revolutionize logistics operations, focusing on optimized installation and crane usage for major components. The efficiency gains were immediate, driving a large-scale rollout this year. By utilizing an end-to-end logistics provider, we've reduced the burden on delivery partners while deepening collaboration with major equipment partners and general contractors. This shift enables true “just-in-time” delivery, cutting out wasted steps, reducing errors and ensuring higher quality outcomes.

We scaled the model across our portfolio in 2025 — three campuses (PHX, IAD and DFW), 451 inbound shipments coordinated end-to-end and \$16.8M of integrated logistics spend flowing through a single accountable partner instead of fragmented across multiple vendors. By 2026, the program expands to our ORD and JAN campuses.



Enabling Our Teams with AI

Our IT team has led the charge on identifying how AI can be optimized to enable teams across Compass. 2025 was a year of experimentation and learning, and the results speak for themselves: over 90% of the organization is now actively using AI. We made it happen through ‘brown bag sessions,’ one-on-one trainings, awareness and how-to videos and organization-wide tools and practice sessions. Today, AI is embedded in the daily work of teams across Enterprise Risk, Cybersecurity, Legal, Engineering, Marketing and Program teams among others. A few examples:

Electrical Failover Calculations

Compass is using AI to automate electrical failover calculations from PDU to UPS level, reducing manual effort and improving accuracy across design workflows.

Substation Design & Analysis Tool

A new AI-powered tool runs thousands of simulations to generate optimized, N-1 compliant substation feeder layouts — replacing a manual design process with automated scenario analysis, one-line diagram visualization and auto-generated standard operating procedures for each failure scenario.

Prototype Drawing QA/QC Review

An AI-assisted workflow reduced schematic design review time from up to 24 hours to just 1–2 hours, identifying 77 findings across 122 sheets in a fraction of the manual effort.

Automated PUE Calculator

Compass replaced a complex manual Excel process with an automated Power Usage Effectiveness (PUE) calculator, cutting scenario testing to a single click while eliminating data entry errors that could affect energy efficiency commitments.

Drawing Technical Compliance Review

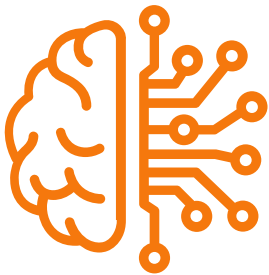
An AI tool was used to review nearly 600 drawings and 350 specification sections against 200+ compliance requirements, a task that would take days manually, with less than 4% error rate — and the tool continues to improve with each iteration.

Building Derating Calculator

A new AI tool now calculates data hall and building derating for high-elevation and high-temperature sites in minutes, replacing a process that previously took several hours and supporting faster, more accurate site evaluations.

Air Permit Strategy Calculator

An AI-powered tool now automates complex air quality permitting calculations, helping teams quickly assess regulatory thresholds and catch consultant errors before submission — reducing permitting bottlenecks and mitigating compliance risk.



Next year, we’ll build on this launch to refine and expand the value we can gain from AI across more teams.

ICMA Platinum Medallion for Excellence in Industrialized Construction

In 2025, Compass was the first and only data center to be awarded the [ICMA Platinum Medallion](#) for Excellence in Industrialized Construction by the Industrialized Construction Group (ICG). This is ICG's highest level of recognition and a distinction that awards leadership in construction innovation.

ICG's rigorous Industrialized Construction Maturity Assessment (ICMA) evaluates how effectively organizations adopt industrialized construction practices across design, supply chain, materials and construction processes. Achieving the Platinum level signifies that Compass ranks among the most advanced organizations globally, with practices that serve as a benchmark and blueprint for the broader construction industry.

We are honored to receive this recognition of our work to deploy industrialized construction methods to ultimately deliver data centers that are faster to build, more predictable in cost, safer for workers and more sustainable than those constructed using traditional techniques.





Environment



Environment

At Compass, environmental responsibility is inseparable from how we design, build and operate our campuses. As long-term owners, our decisions prioritize durability, efficiency and resilience from the start — if a piece of equipment costs more upfront but doesn't need to be replaced multiple times over a building's 100 year life, we make that investment rather than accept the cycle of transactional and landfill waste. It's the right business decision, and it consistently delivers more sustainable outcomes across the full lifecycle of our assets.

Our environmental strategy is rooted in practical action and measurable outcomes. Rather than pursuing one-off initiatives, we concentrate on systemic improvements that scale across our portfolio and meaningfully reduce emissions, resource use and operational risk. From materials to construction practices and green building certification standards, we look for opportunities to

eliminate impact before it occurs — what our CEO Chris Crosby calls "[Scope 4](#)," or avoided emissions. While not a formal category under the GHG Protocol, the concept is gaining recognition across the data center industry and beyond: the waste and emissions you prevent through better design and more durable materials are just as meaningful as the ones you measure and report.¹

We select better materials, standardize efficient designs, adopt technologies that deliver real-world benefits and refine the means and methods that shape construction and operations. This integrated approach allows us to continuously improve while maintaining the reliability, safety and speed our customers expect. The result is environmental progress that is built into the fabric of our campuses, not layered on after the fact.

¹The concept of avoided emissions has been formalized by the World Business Council for Sustainable Development (WBCSD), which published its Guidance on Avoided Emissions v2.0 in July 2025. In April 2026, the GHG Protocol proposed a restructuring of corporate climate reporting that would include dedicated space for reporting avoided emissions impacts. For Compass' approach to avoided emissions, see "Defining Scope 4 Emissions" at compassdatacenters.com.

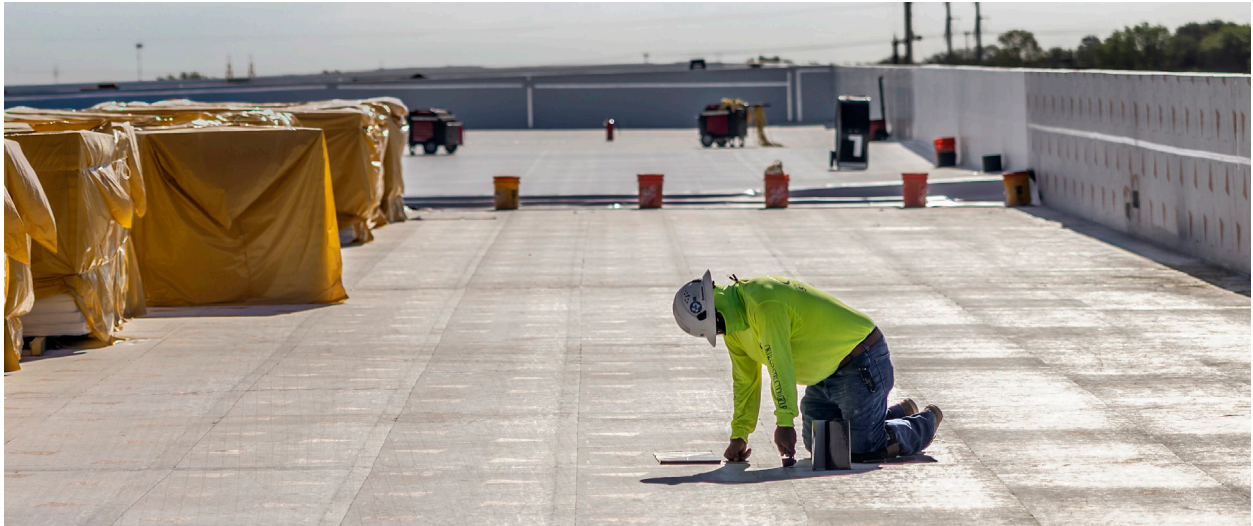


Our Approach to Emissions Reductions

As a hyperscale data center developer, many of the operational emissions associated with our campuses are reported by our customers under the GHG Protocol, rather than by us. Still, as the company that designs, constructs and operates these facilities, we take responsibility for managing the emissions we can influence by focusing on where our decisions have the greatest impact.

For Compass, that means prioritizing emissions intensity reductions (the emissions for each unit of what we build) and a focus on embodied carbon, rather than absolute emissions alone. We understand that absolute emissions are what drive environmental outcomes, but emissions intensity improvements are a more effective way to measure our performance and commitments, especially as demand for digital infrastructure continues to grow. We focus on improving the efficiency of our buildings, equipment and delivery model by reducing emissions per unit of capacity through better design, material choices and operational practices.

While our absolute footprint grows with digital infrastructure demand, our standardized delivery model held operational efficiency steady in 2025 — even as we expanded into higher-carbon grids. On-site, 70% of backup generator fuel purchased was HVO, replacing traditional diesel. And our first whole-building LCA using real supplier data sets a stronger baseline for measurable embodied carbon reductions ahead.





Embodied Carbon

Embodied carbon refers to the greenhouse gas emissions arising from the manufacturing, transportation, installation, maintenance and disposal of building and infrastructure materials.²

² <https://carbonleadershipforum.org/embodied-carbon-101-v2/>

Sustainable Design & Construction

Green Globes Certifications

Solidifying our commitment to sustainable design and construction, we continue to pursue [Green Globes](#) certifications across our portfolio. In 2025, all our existing buildings were successfully Green Globes certified alongside our new builds that came online in 2025. In total, that's 13 buildings across 5 campuses certified, with a total of 23 Globes awarded. We chose Green Globes for our green building certifications because it better aligns with mission critical facilities and has an emphasis on actual performance. We are looking ahead to hold ourselves to this standard and continue certification across all new builds, embedding GBI's requirements into our design and construction processes.



Green Globes

Green Globes certifications are issued by the Green Building Initiative (GBI), 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.



Sustainable Design & Construction

GBI Campus Certification

Data center campuses present sustainability challenges that traditional green building certifications are not designed to fully address. This year, to help close this gap, we co-developed and [launched the Green Globes Data Center Campus Certification](#) in partnership with GBI.

A program purpose-built for large-scale digital infrastructure, this certification takes a campus-wide approach, recognizing the interconnected nature of data halls, shared systems and redundant infrastructure. By enabling multiple buildings to be assessed, the program streamlines certification while more accurately reflecting how data center campuses are designed, built and operated.

Developed with scalability and long-term performance in mind, the Green Globes Data Center Campus Certification supports improved environmental outcomes based on metrics and improvement pathways that are specific to our industry's challenges, capabilities and opportunities. We will be exercising this new certification approach with GBI going forward.



Sustainable Design & Construction

Lifecycle Assessments (LCA)

Lifecycle assessments (LCAs) help make embodied carbon more measurable and more actionable — the emissions embedded in every cubic yard of concrete poured, every ton of steel installed and every unit of equipment delivered to site. Making these material-level impacts visible is the first step to reducing them. In the building sector, “whole building” LCAs often focus primarily on the structure and envelope — what many teams consider the core and shell — because those scopes are the most straightforward to quantify consistently.

Compass is taking a broader, more actionable approach by also quantifying major equipment alongside structural and envelope elements. This expanded scope reflects how data centers are actually built and captures where a significant share of embodied impacts occurs, particularly in mechanical and electrical infrastructure, which is often excluded from traditional LCAs due to limited access to consistent, product-level data.

In 2025, the focus was on building the foundation: working with suppliers and partners to collect better primary data (quantities and emissions data) for priority materials and major equipment. This enables Compass to establish a more accurate baseline and better understand where emissions are concentrated across its builds. In turn, this

strengthens consistency across projects and improves Compass’ ability to prioritize supplier collaboration and design decisions starting in 2026.

Looking ahead, Compass will use this work to establish a more robust baseline LCA of our Moonraker — enabling more targeted reduction efforts where the data shows the greatest opportunity. This includes working alongside closely-coupled partners to refine specifications, expand availability of product specific disclosures and support practical, delivery-aligned decarbonization pathways across the supply chain.

Embodied Carbon



Early unvalidated results indicate major mechanical and electrical equipment can represent a substantial share of a data center’s embodied carbon when assessed alongside structure and envelope — almost double. This highlights a critical gap in traditional whole-building LCAs.

This is where Compass’ closely-coupled partnerships translate into industry leadership. Many manufacturers of complex mechanical and electrical products do not yet provide environmental product declarations (EPDs) or comparable disclosures, in part because of complex supply chains and limited market incentives. By working through closely-coupled partnerships to request, validate and apply better product specific information, Compass is helping accelerate the availability of more decision useful disclosures — which can improve lifecycle assessment practice beyond Compass’ portfolio over time.

Supply Chain Sustainability

Closely-Coupled Partners

Our closely-coupled partners are chosen because they align with our culture, share our core convictions and believe in the power of collaboration as much as we do. Together, we’ve created a tightly-coupled supply chain that enables our unique outcomes.

Meaningful reductions and embedded sustainability in our design and construction practices isn’t possible without the close collaboration of our supply chain partners. Our closely-coupled partnerships have unlocked opportunities unseen before in the industry and we’re all seeing the sustainability benefits. This year, we worked closely with our partners to better measure and quantify the emissions and other benefits of our work together.





MEI Industrial Solutions

Scaling a Manufacturing Mindset Through Integrated Logistics

MEI serves as our full turnkey execution partner, reflecting a shared commitment to treating data center delivery as a streamlined manufacturing process rather than a series of isolated construction projects. By embedding MEI across our supply chain and installation workflows, we deliver campuses as part of a single, coordinated program. This integration provides total visibility, allowing us to identify and remove hidden bottlenecks to maximize waste reduction and cost savings.

Unlike traditional models, MEI supports the entire lifecycle: from national warehousing and transportation to on-site rigging. Equipment is staged centrally and deployed on a just-in-time basis as schedules evolve, significantly minimizing equipment mileage. After a successful 2024 pilot, we scaled this model across multiple markets in 2025, increasing agility and reducing unnecessary re-handling.

People-Centered Outcomes and Job Creation

This programmatic approach also allows MEI to invest in people. By building dedicated teams that move between campuses, we retain hard-earned institutional knowledge. In 2024 and 2025, MEI expanded its workforce in Phoenix and Meridian, creating dozens of durable jobs tied to repeatable, long-term work.

Upstream Innovation

In 2025, MEI’s role expanded into the design phase. By providing early input on the transportability and rigging of our modular equipment, they ensure our components are not only efficient to operate but safer and easier to install over their full lifecycle.



“Compass views data center delivery as a national program, not a collection of individual projects. Because we’re integrated across supply chain, logistics and installation, we can optimize for speed, cost and sustainability at the same time – and eliminate a lot of waste that’s just accepted elsewhere in the industry.”

Jim Bennett, Chief Strategy Officer, MEI



Schneider Electric

Turning Lifecycle Insight into Repeatable Improvement

Compass and Schneider Electric collaborate at the factory and prototype level to embed “lifecycle thinking” into data center infrastructure. By treating sustainability and performance as upstream design requirements rather than downstream considerations, we improve outcomes before equipment ever reaches a campus.

Digital Commissioning & Speed

In 2025, we pivoted toward digital commissioning. By validating power center performance at the factory, we reduced onsite commissioning requirements. This shift accelerated delivery, minimized site disruptions and established a reliable performance baseline for every unit.

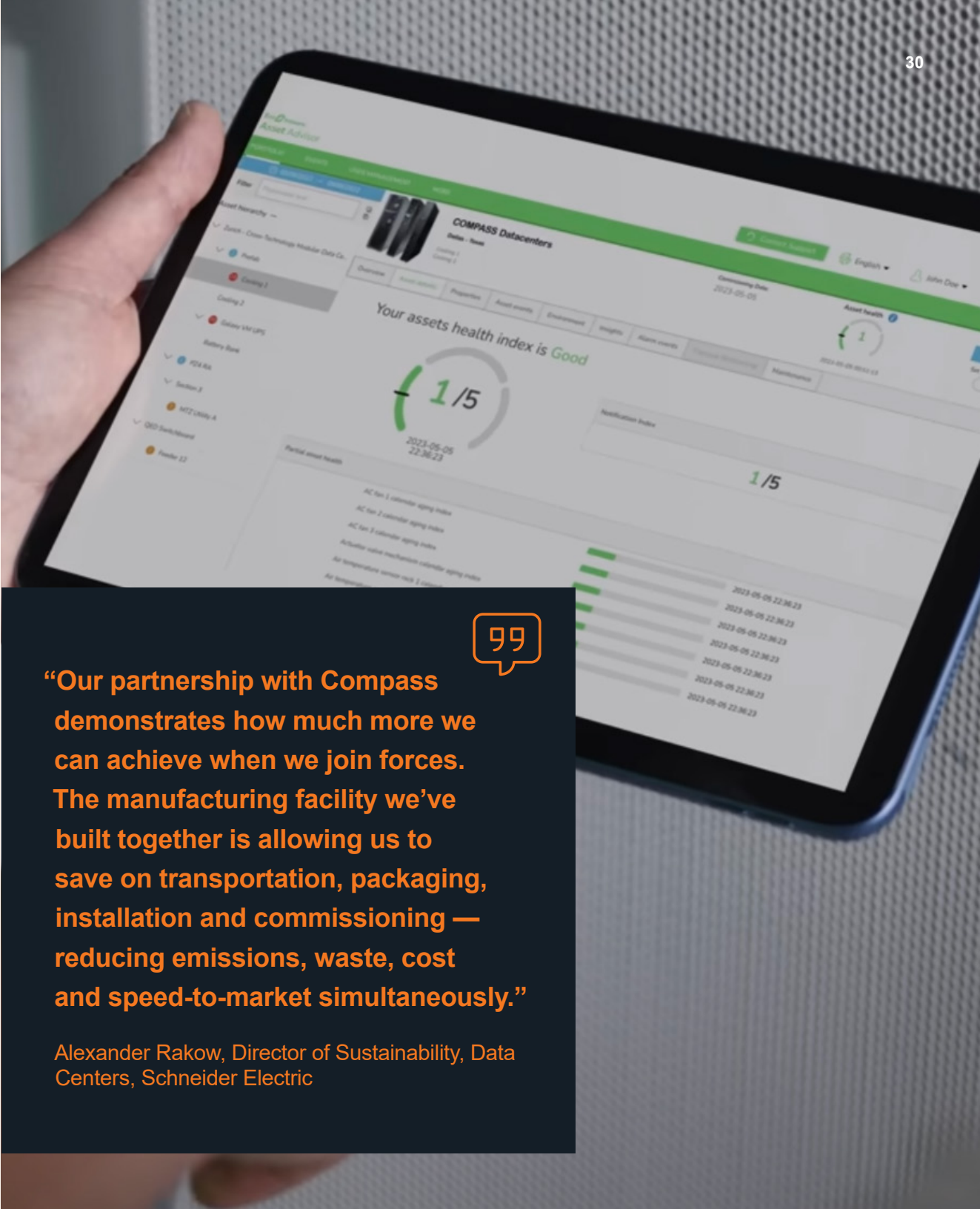
Carbon & Operational Resilience

To create a roadmap for future builds, we completed detailed embodied carbon analyses for critical infrastructure, including power

centers and emerging modules. This data allows us to pinpoint exactly where material choices and manufacturing decisions have the greatest impact.

Furthermore, operational resilience is bolstered by Schneider’s [EcoCare](#) and predictive maintenance services. By monitoring real-time performance against the factory baseline, we can detect issues early, extend asset life and reduce waste while improving reliability across our global footprint.

Together, Compass and Schneider are proving that technical collaboration grounded in shared data and standardized prototypes turns measurement into meaningful, scalable improvement.



“Our partnership with Compass demonstrates how much more we can achieve when we join forces. The manufacturing facility we’ve built together is allowing us to save on transportation, packaging, installation and commissioning — reducing emissions, waste, cost and speed-to-market simultaneously.”

Alexander Rakow, Director of Sustainability, Data Centers, Schneider Electric



RK Industries

Cutting Emissions and Waste with Partnerships that Scale

By centralizing fabrication with RK Steel, RK Mission Critical and RK Water, we are reducing transportation and material waste through purpose-built manufacturing. [Standardizing our designs](#) and applying Lean Manufacturing Principles allows us to deliver data center infrastructure with a lower environmental footprint and greater scalability.

Precision Manufacturing at Scale

To support our standardized product lines, RK Steel opened a dedicated 70,000-square-foot integration facility in Denver specifically for Compass. By consolidating assembly under one roof, we eliminate an estimated 8,000 hours of trucking annually and provide stable, year-round employment that supports our national workforce and project pipeline. This facility utilizes custom, first-of-its-kind tooling engineered for our specific product lines, holding equipment with greater precision and reducing machine time.

As a result, we expect:

- A 25% decrease in fusion time, increasing throughput and lowering resource intensity.

- A 1–3% reduction in material waste through optimized steel nesting.
- Enhanced lifecycle performance via the expanded use of corrosion-resistant NUPi piping, with environmental product declaration-certified 100-year lifecycle performance and ~80% lower embodied carbon than comparable steel systems.

Collaborative Design & Reuse

Our partnership with RK Water has produced prototypical Water Treatment Skids designed for rapid deployment. By conducting on-site product reviews and localizing pipe fabrication within the same Denver facility, we have streamlined unloading strategies and slashed transportation emissions.

Looking toward 2026, we are advancing a programmatic material reuse initiative to return and repurpose shipping crates and hardware for future production cycles, closing the loop on our manufacturing process.



A small orange speech bubble icon with two quotation marks inside.

“What sets Compass apart is their commitment to real partnership. By working side by side to standardize design and develop custom fusion solutions, we’ve been able to create a manufacturing model that improves efficiency and reduces waste at scale.”

Donnie Hirschfield, President and General Manager, RK Steel and RK Energy



Vertiv

Co-Developing Scalable Cooling for a Changing Compute Landscape

The Compass-Vertiv partnership addresses a critical challenge: designing cooling systems that support current workloads while remaining adaptable for the future. By co-developing systems rather than relying on off-the-shelf products, we ensure our infrastructure is fully integrated into Compass’ standardized delivery model.

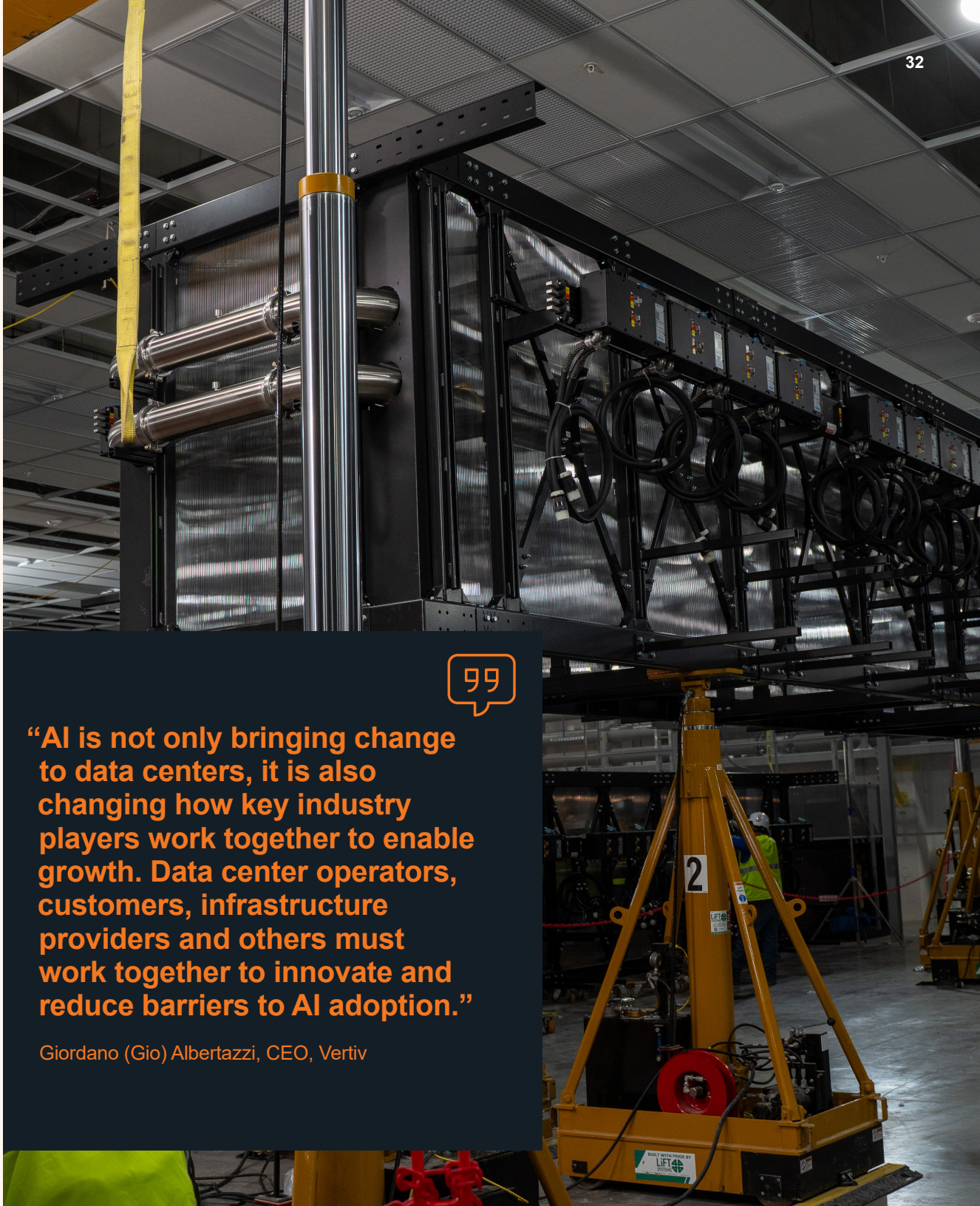
Hybrid Flexibility & Risk Mitigation

In 2025, we deployed the CoolPhase Flex (DH400) units across multiple campuses. These systems allow us to support traditional air-cooled environments and emerging liquid-cooled AI workloads simultaneously — without changing the yard design. This flexibility eliminates retrofit risks and minimizes disruption as compute requirements evolve. By shifting more technical work offsite, we reduced onsite installation complexity, improved quality control and shortened commissioning timelines.

Scalable Whitespace Solutions

Parallel to cooling, we deployed prefabricated whitespace and containment solutions. These standardized designs improve fungibility across campuses, reduce rework and enable faster, more repeatable deployments — a cornerstone of the Compass long-term operating model.

Together, this partnership demonstrates how technical collaboration unlocks infrastructure that is not only more resilient today but better positioned to serve customers over the full lifecycle of a campus.



99

“AI is not only bringing change to data centers, it is also changing how key industry players work together to enable growth. Data center operators, customers, infrastructure providers and others must work together to innovate and reduce barriers to AI adoption.”

Giordano (Gio) Albertazzi, CEO, Vertiv



Siemens

Co-developing Modular Electrical Infrastructure to Power Faster, More Scalable Delivery

Compass and Siemens have partnered to solve a persistent industry challenge: the time-intensive, site-heavy deployment of critical electrical infrastructure. By moving away from off-the-shelf components, we’ve co-developed purpose-built solutions delivered as single, integrated units within Compass’ standardized kit-of-parts.

Medium-Voltage Efficiency: The RMU Skid

The [Ring Main Unit \(RMU\) Skid](#) consolidates Siemens’ gas-insulated, arc-resistant medium-voltage switchgear and transformer into one prefabricated unit. Its maintenance-free design extends equipment service life and reduces service interventions, while its compact footprint improves operational energy efficiency — conserving resources over the full lifecycle of a campus.

Low-Voltage Innovation: The Support Skid

We applied the same modular philosophy to low-voltage distribution with the Support Skid, moving from concept to factory floor in under a year. Now deploying as two units per building, the Support Skid provides all power distribution for non-critical spaces on a single pre-assembled, pre-validated unit.

Securing the Future at Scale

These solutions form the electrical backbone of our delivery model. This commitment is formalized through a multi-year capacity agreement securing up to 1,500 RMU Skid units over the next five years. This partnership demonstrates how deep technical collaboration translates into faster delivery, reduced on-site risk and infrastructure built for long-term resilience.



“At Siemens, we are ‘productizing’ the critical components necessary so companies like Compass can build new data centers faster while reducing on-site work and costs. The prefabrication and modular design of our technology provides the bedrock needed to meet the demand the industry is calling for.”

Brian Dula, Region CEO, Electrification and Automation, Siemens Smart Infrastructure USA

Zero Waste

In 2025, we continued our commitment to the UL 2799 Standard for Environmental Claim Validation Procedure for Zero Waste Classifications. Our YYZ II site successfully achieved its second consecutive year of Zero Waste validation. We also officially commenced the first validation cycle for our IAD campus. Currently, this site is maintaining the required diversion rates, with the goal of achieving full validation in 2026. This means we are successfully achieving a 90% or higher annual waste diversion rate at these sites.

Our Zero Waste initiative tracks all materials leaving our data center facilities, providing critical data for ESG reporting frameworks, supports our Green Globe certifications and aligns with our broader environmental management initiatives. We aim to achieve Zero Waste certification within 18 months after construction.



GHG Inventory

The greenhouse gas (GHG) accounting landscape for data centers continues to mature, and Compass remains committed to transparent, accurate and continuously improving emissions reporting. Through close collaboration with our customers, suppliers and partners, we continue to strengthen standardization and data quality across our inventory, while also taking a leading step in expanding visibility into emissions sources that have historically been difficult to quantify, including key mechanical and electrical equipment.

In 2025, Compass further improved its GHG inventory methodology by expanding data coverage and incorporating more accurate, measured inputs related to electricity consumption, refrigerant leaks and use of renewable diesel. Compass also completed our first whole-building lifecycle assessment using supplier data on structure and envelope, giving greater insight into material emissions from capital goods. As a result of these improvements, prior years' emissions have been restated where appropriate to ensure consistency and comparability over time, in alignment with the GHG Protocol.

Compass' growth has led to increasing absolute emissions year over year. This reflects the rapid expansion of digital infrastructure required to support cloud computing, AI and the broader digital economy. For this reason, Compass continues to emphasize emissions intensity (emissions per MW) alongside absolute emissions, allowing us to better understand how efficiently we deliver capacity as we scale. Reducing emissions intensity across scopes remains a core focus.

Automated data collection

We continue to enable greater transparency and consistency in our data with more thorough, automated data collection. This allows us to better meet customer needs, benchmark our performance and identify new innovative opportunities. We aim to include new types of data moving forward as the sector matures to unlock greater insights.





GHG Inventory

Inventory boundaries & definitions

Our GHG inventory adheres to the GHG Protocol’s corporate accounting standards and includes scopes 1, 2 and select scope 3 categories that are most material to Compass’ business model.

Scope 1

Direct emissions from sources owned or controlled by Compass, including diesel and hydrotreated vegetable oil (HVO) used in onsite backup generators, fugitive refrigerant emissions from cooling systems at data centers and corporate offices and natural gas used for heating in corporate offices.

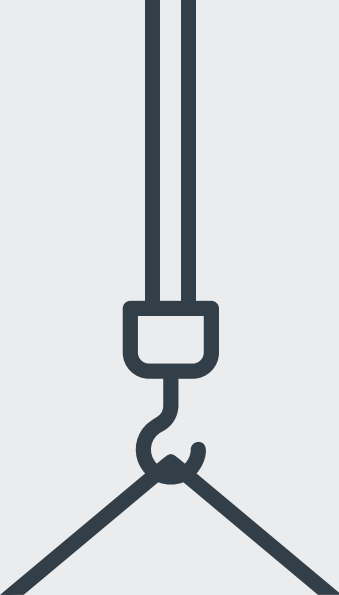
Scope 2

Indirect emissions from purchased electricity used by Compass, including electricity consumed by data centers prior to turnover to clients and electricity used in corporate offices.

Scope 3:

Indirect emissions occurring throughout Compass’ value chain. Compass currently reports on the categories most material to our operations:

- **Category 2:** Capital goods’ emissions associated with the embodied carbon of construction materials.
- **Category 13:** Emissions from downstream leased assets, namely electricity consumed by clients after data center turnover.



GHG Inventory

Scope 1 and 2

Scope 1 and scope 2 emissions represent Compass’ direct operational footprint and are a relatively small portion of our overall emissions profile. As a data center developer, Compass owns and operates facilities primarily during construction, commissioning and early operational phases, after which operational control of energy-intensive activities transfers to our clients.

Scope 1 emissions include fuel consumed by onsite generators (diesel and HVO) for testing and backup power, fugitive emissions from refrigerants used in cooling systems at both data centers and corporate offices and natural gas used for space heating in corporate offices.

Fuel consumption data is collected from onsite meters wherever available, with conservative estimates applied where data gaps remain. Backup generators are compatible with both traditional diesel and low-carbon alternative fuels. HVO, a renewable diesel alternative, is used when possible. In 2025, we improved our visibility into HVO consumption data per site, which is collected based on bills from each site.

HVO Fuel



We also enable our generators to be powered by low-carbon hydrogenated vegetable oil (HVO) fuel, offering our customers a low-carbon fuel alternative. When Compass is responsible for commissioning, we ensure the first generator fills are HVO.

In 2025, Compass significantly expanded data coverage for fugitive refrigerant emissions in collaboration with our closely coupled partners who provide and maintain our HVAC equipment. This expanded visibility improved the completeness of reported emissions while reducing the total from previous conservatively estimated values. We have previously estimated refrigerant losses to the atmosphere through additions during servicing; our improved data visibility means that this year’s inventory includes only actual losses to the atmosphere and is therefore more accurate. Refrigerant losses for 2023 and 2024 were also restated to include only loss to atmosphere, leading to a substantial drop in related emissions across all reporting years, with a steady year over year trend.

Natural gas use and refrigerant emissions from leased corporate office locations continue to be estimated using regionally appropriate benchmarks based on building size and occupancy.

Low GWP Refrigerant



We’re always looking for ways to reduce our environmental footprint. Working with our partners at Vertiv, we’re replacing the refrigerant in our DP400 and Vertiv™ CoolPhase Flex HVAC units with an A2L class refrigerant, which carries a lower global warming potential (GWP) than traditional options. Small upgrades. Lasting impact.

GHG Inventory

Scope 1 and 2

Scope 2 emissions include purchased electricity used by Compass prior to our data centers’ turnover to customers, as well as electricity used in corporate offices. Electricity consumption at data centers is included only for the period during which Compass maintains operational control, consistent with GHG Protocol guidance. Electricity used after turnover is reported under scope 3, category 13.

No material methodological changes were made to scope 2 accounting in 2025. However, continued improvements to internal metering, validation processes and data integration through Compass’ ESG data systems have strengthened the reliability and consistency of scope 2 data. Scope 2 emissions remain a relatively small and variable portion of Compass’ overall emissions profile, influenced by construction schedules, commissioning duration and timing of building turnover.



GHG Inventory

Scope 3

As a data center developer, the majority of Compass’ GHG emissions occur outside of our direct operational control. In alignment with the GHG Protocol, Compass focuses its scope 3 reporting on the categories most material to our business model: emissions related to the embodied carbon of construction materials and electricity consumed by clients operating within Compass facilities.

Embodied Carbon



Embodied carbon refers to the GHG emissions associated with the materials and construction of a building — including raw material extraction, manufacturing, transportation and installation — before the facility becomes operational.

Embodied carbon is a critical and often under addressed driver of emissions

in the data center sector, particularly given the scale and speed of infrastructure deployment. By working with our closely coupled partners, we are working to better understand and quantify the embodied carbon of our buildings to enable reduction strategies and encourage the industry to do more of the same.

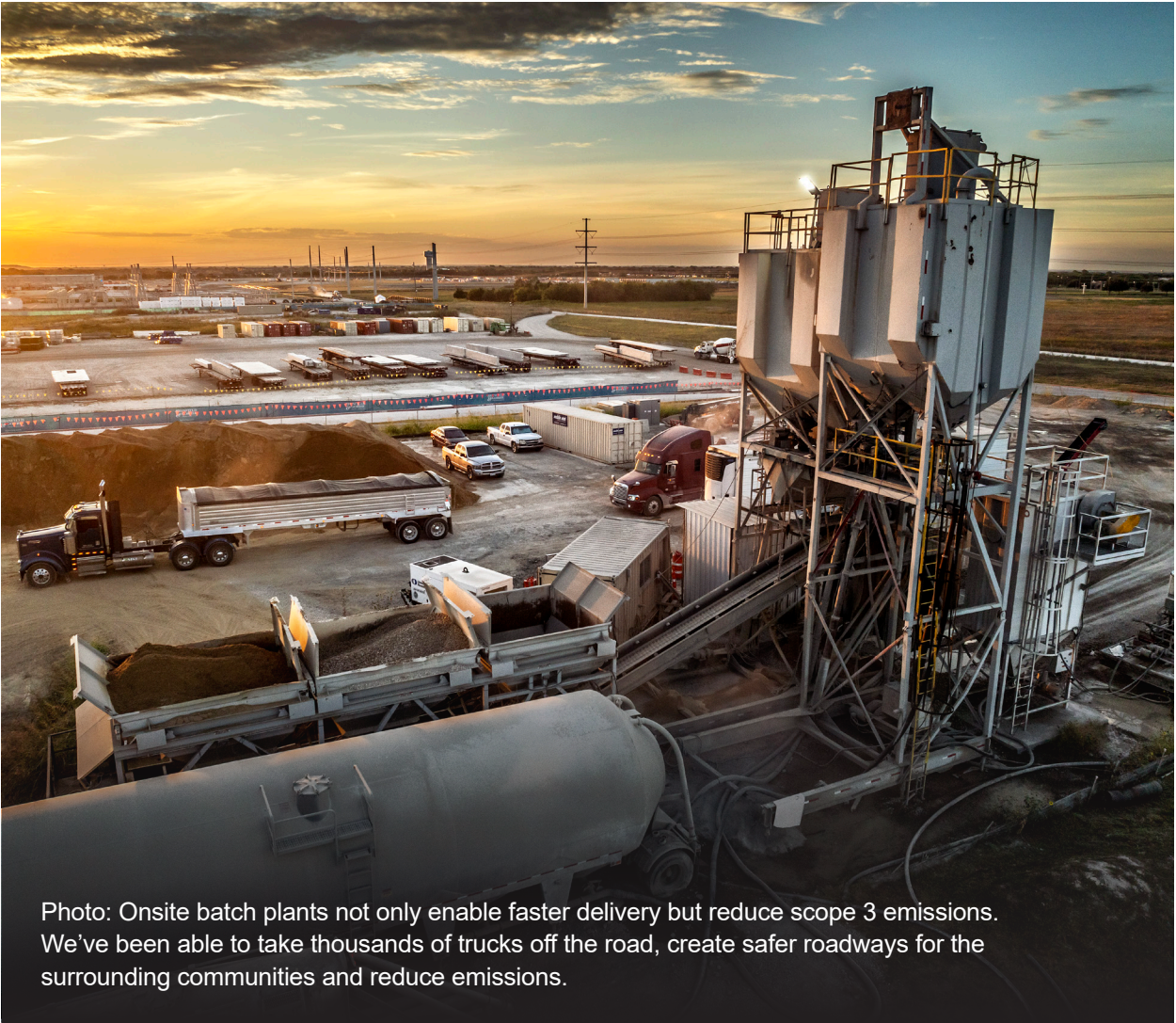


Photo: Onsite batch plants not only enable faster delivery but reduce scope 3 emissions. We’ve been able to take thousands of trucks off the road, create safer roadways for the surrounding communities and reduce emissions.

GHG Inventory

Scope 3, category 2: Purchased capital goods and services

Scope 3, category 2 emissions represent the embodied carbon associated with materials and services purchased for data center construction. This includes emissions for the extraction, processing, and manufacturing of key building materials, such as concrete and steel. It does not include transportation of the finished products to the construction site or the construction process itself.

Consistent with prior reporting, Compass attributes emissions from construction

materials to the reporting year in which construction begins. This approach reflects the fact that the majority of embodied emissions occur early in the project lifecycle and allows for consistent year over year comparison across a rapidly growing portfolio.

In 2025, Compass conducted a whole-building LCA using supplier data to better understand the embodied emissions of its construction materials. This LCA includes the complete building

envelope and structural elements, including the material components of footings and foundations, structural floors and ceilings. This allowed us to generate a custom emission factor for our construction materials, enabling more accurate and reliable results. We aim to improve our custom emission factor, including more third-party-verified EPDs and expanding the scope in future years.

Scope 3, category 13: Downstream leased assets

Scope 3, category 13 emissions account for electricity consumed by our customers who operate within Compass data centers after turnover. Due to the energy-intensive nature of digital infrastructure, this category represents the largest share of Compass’ total emissions.

In 2025, Compass improved its data collection methodology for category 13 by replacing estimated electricity consumption with measured data wherever possible. This shift improves the predictability, reliability and consistency of reported emissions across the portfolio and reduces uncertainty associated with prior estimation methods. Where measured data remains unavailable — typically in facilities managed directly by customers — Compass applies conservative estimation approaches.

While Compass does not control customers’ IT loads or operational decisions, we recognize our role in enabling lower carbon outcomes. This includes designing more energy-efficient facilities and collaborating with clients on emissions transparency.



Embodied Emissions from Construction Materials



We used to estimate the emissions from our base buildings using broad industry averages, essentially typical numbers for a typical building. This year, we replaced those estimates with real, building-specific data

drawn from a detailed LCA. More accurate data means a higher, truer number. We’d rather measure ourselves honestly than flatter ourselves with easy assumptions, so we applied this stricter standard across every

reporting year. By grounding ourselves in real data instead of industry averages, we can now track genuine improvement going forward and help move the whole industry toward doing the same.

GHG Inventory

Year-over-year changes

Compass’ year over year emissions trends reflect a combination of rapid portfolio growth, expanded data coverage and continued refinement of measurement methodologies. As the company scales, absolute emissions are expected to increase. However, emissions intensity (emissions per MW) provides a clearer view of performance and efficiency over time.

Scope 1

Absolute up 72% due to portfolio growth. Intensity up 6% driven by increased diesel use, partially offset by HVO.

Scope 2

Absolute down 55%; intensity down 73%. Small, variable portion of total emissions.

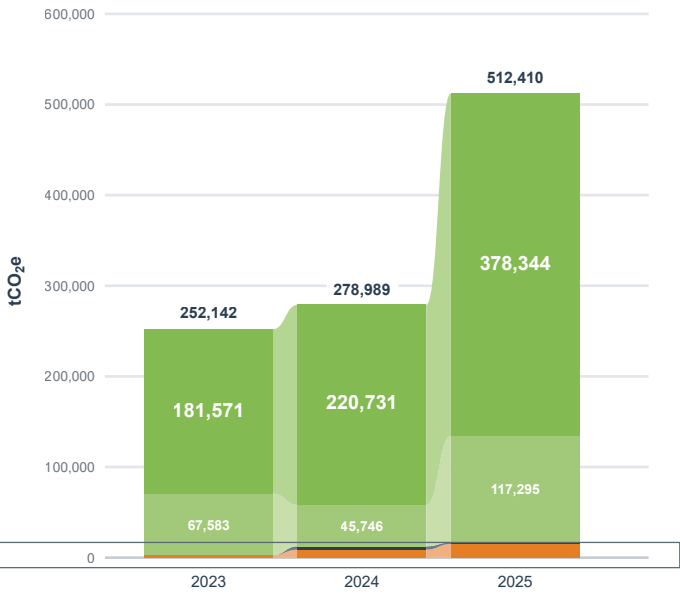
Scope 3 Category 2

Absolute up 156%; intensity flat. Our standardized construction practices mean emissions intensity doesn’t vary greatly year-over-year.

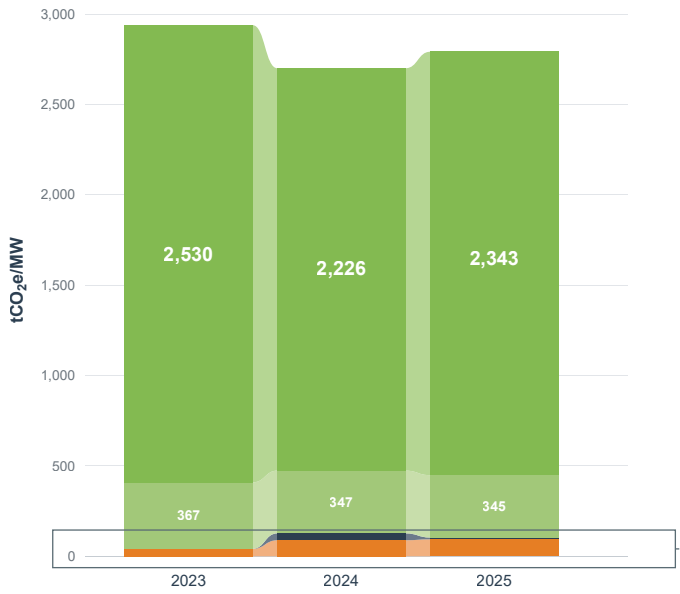
Scope 3 Category 13

Absolute up 71%; intensity up 5%, reflecting stable grid emissions and standardized operations..

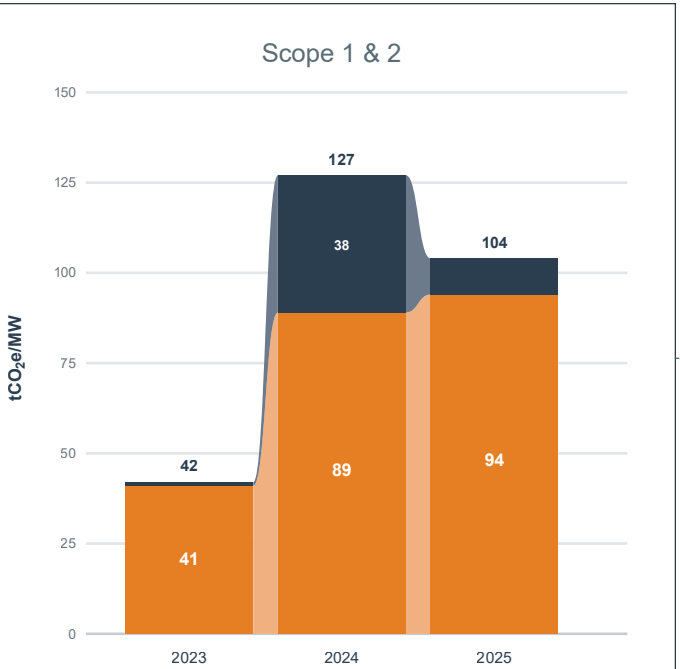
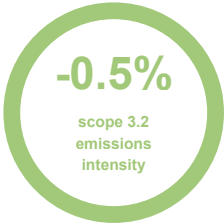
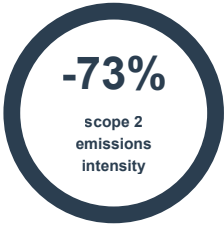
Absolute Emissions 2023-2025



Emissions Intensity 2023-2025³



Change in Emissions Intensity 2024-2025



- Scope 1
- Scope 2
- Scope 3 Category 2: Capital Goods
- Scope 3 Category 13: Downstream Leased Assets

Figures have been rounded

In plain terms, our footprint grew because we grew, not because we got worse at building. More building did not mean more waste; our efficiency held firm even as our volume surged.

³ Emission intensity for scope 3, category 2 is measured per MW constructed, whereas other emission intensity categories are measured per MW of power used.



Social



Social

At Compass, our social impact begins with people — our team, our partners and the communities where our campuses take shape. We believe long-term value begins with a strong company culture built on a shared purpose of making lives better. As we scale, we remain deeply invested in the well-being, development and inclusion of the Compass team, recognizing that our people are the connective tissue between our values and the outcomes we deliver. A resilient, values-driven culture enables us to move quickly without losing sight of what matters most: doing the right thing for the people we work with and the communities we serve.

We view every campus as a commitment to being a responsible neighbor. Through early engagement and transparency, we ensure our developments create shared benefits — from supporting local workforce pathways to building community trust. By pairing a strong internal culture with intentional partnership, we build more than data centers; we create environments where people and opportunity grow together.



Culture as a Driver of Outcomes

At Compass, culture isn't a program — it's how we operate. For nearly 15 years, our four core convictions have guided every decision we make:

- Humility in, Pride Out
- Our Actions and Words are One
- Continuous Improvement
- We Ask Why

These convictions are the operating system behind how we develop our people and deliver on our commitments to customers and communities. The past year marked meaningful progress in how we are putting those convictions to work in new and more deliberate ways.



“Compass genuinely values its people — and you can feel it every day. The culture here isn’t just a poster on a wall or a talking point for show. It’s something that’s actively lived out. Leadership takes the time to understand who we are as individuals, what drives us and where we thrive. They don’t just plug people into roles — they develop strengths and nurture potential. I’ve grown more here than I ever imagined.”

- Employee Testimonial

Anna Carlton Named Chief Culture Officer

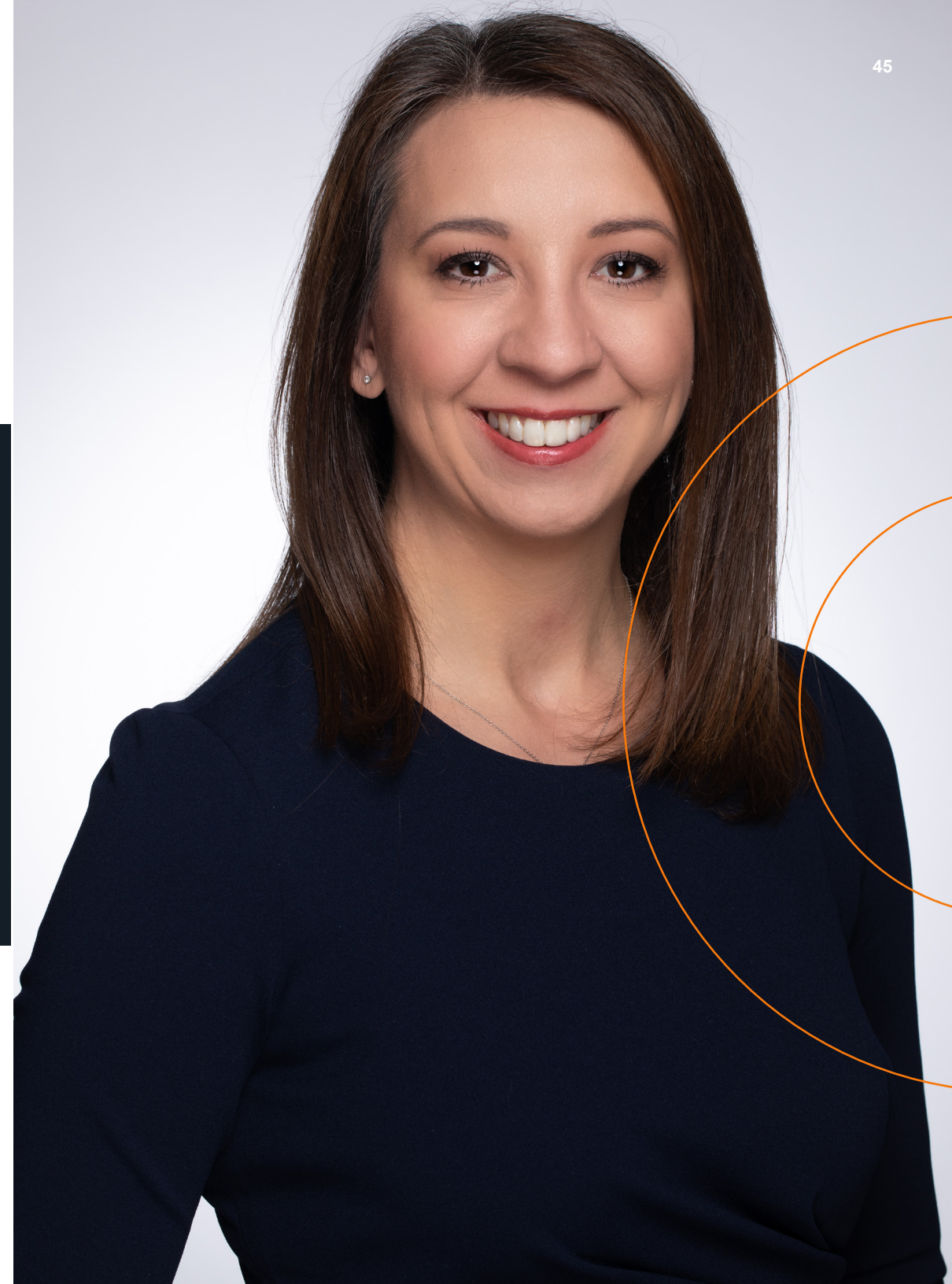
This year, Compass formalized our commitment to people by naming Anna Carlton as our first Chief Culture Officer. Since joining Compass five years ago, Anna has been instrumental in translating our core convictions into frameworks that develop our talent and refine our processes. With over two decades of experience in human resources, consulting and culture development, Anna is passionate about helping businesses and people thrive together. She is dedicated to cultivating a workplace where people can find joy, innovate and continuously learn and grow – personally and professionally.

In this role, Anna's mission is to ensure our culture remains a powerful driver of business outcomes. By turning cultural principles into actionable programs, she is already accelerating employee development and deepening the alignment between our internal values and the external customer experience.



Culture provides a shared set of convictions and practices that produce innovative ideas, stronger collaboration and better outcomes for our people, customers and communities.”

Anna Carlton, Chief Culture Officer

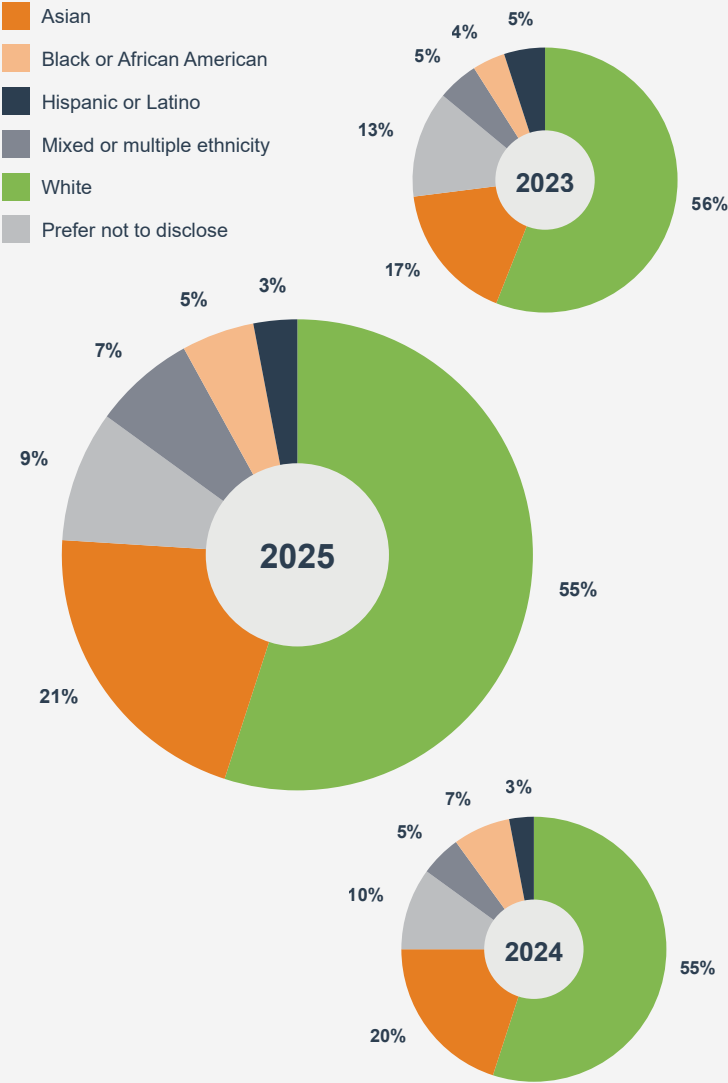


Diversity Through Culture, Not Compliance

Diversity is an outcome of strong culture. At Compass, we don't treat it as a compliance exercise — we treat it as a competitive advantage. When people with different backgrounds, perspectives and approaches to problem-solving work together under a shared set of convictions, the result is better ideas, stronger collaboration and better outcomes for our people, customers and communities.

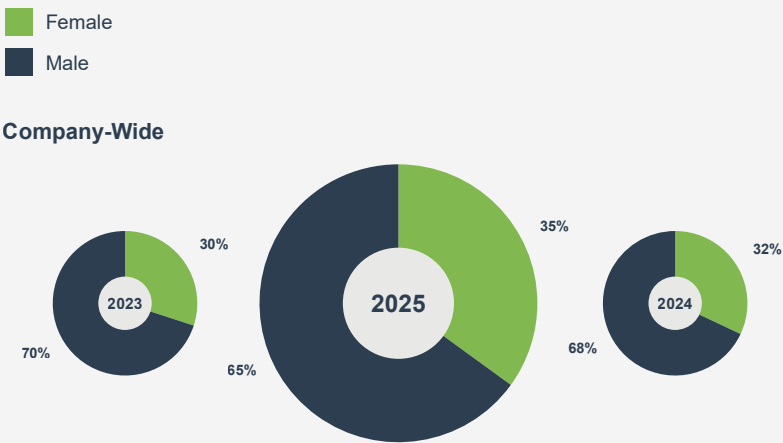
At the end of 2025, our team consisted of 195 employees, with 45 new hires and an 18% attrition rate.

Ethnicity

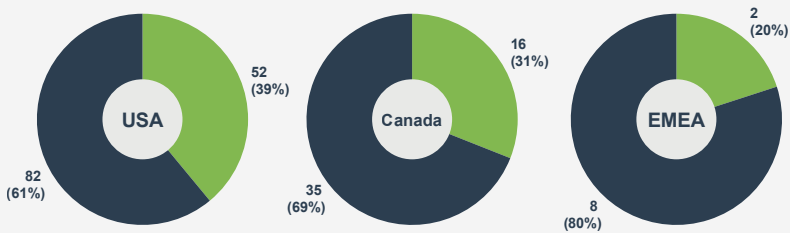


Figures have been rounded

Gender



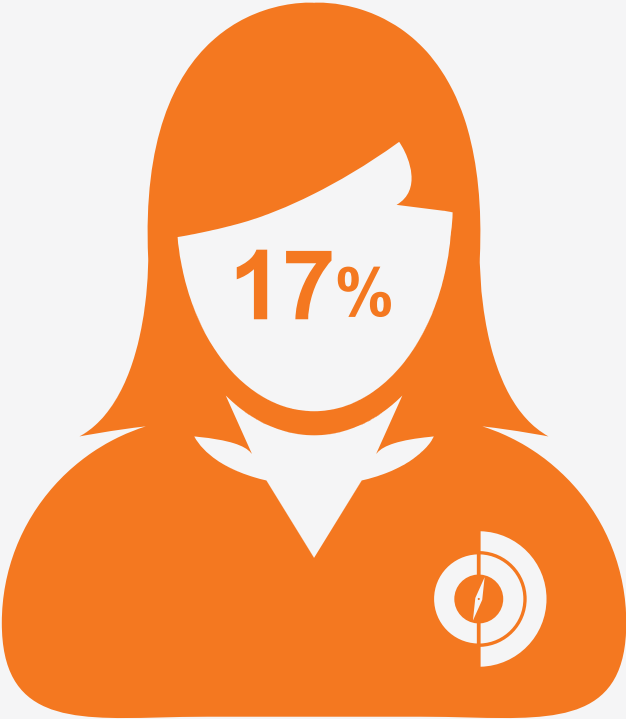
2025 by Region



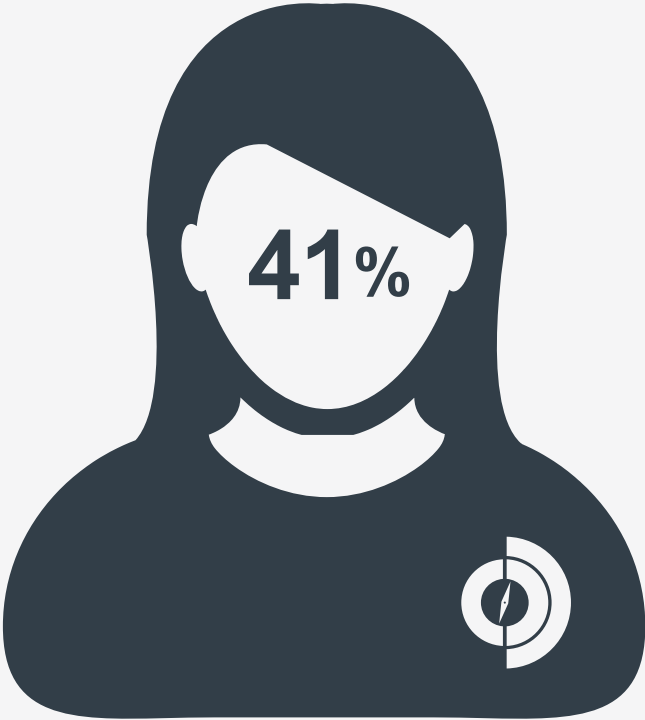
In Numbers



of our U.S. construction managers are female⁴



of our Executive Leadership Team is female



of our Senior Leadership Team is female

⁴ Women represent approximately 11.2% of the U.S. construction workforce and 18–20% of management roles industry-wide. Compass’ figure is more than four times the national management average.

Harnessing Cognitive Diversity with DiSC

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.

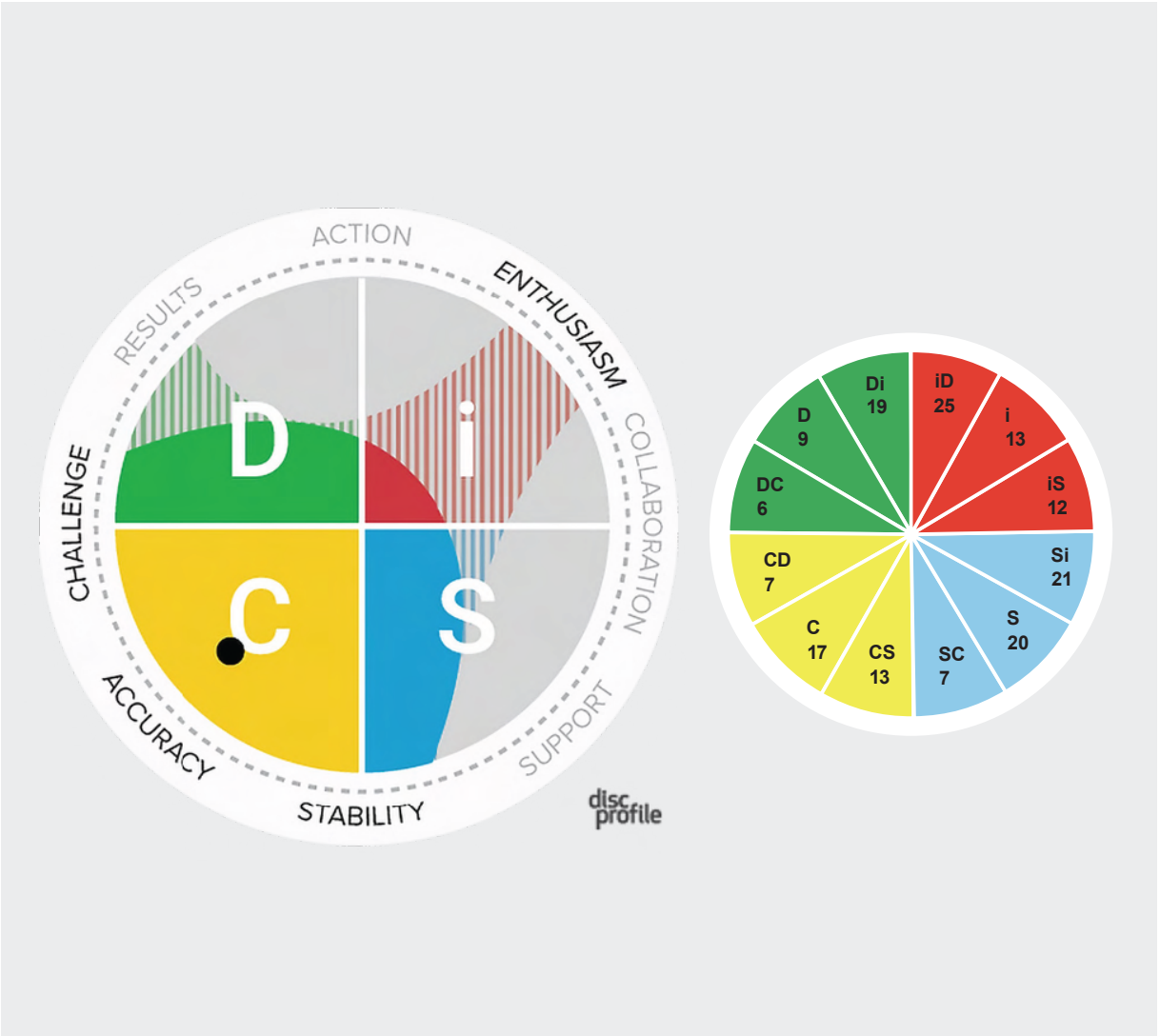
Last year, we introduced the **Everything DiSC®** methodology to transform our team’s diversity into a deliberate operational strength. By using these behavioral insights to refine how we communicate and collaborate, we’ve seen a direct impact on our culture: **93% of employees** report being treated with respect by coworkers, and **92%** feel deeply accepted by their teams.

Over the past year, we’ve integrated these insights across the organization:

- **Engineering & Technology:** Our tech teams use DiSC to navigate complex, cross-disciplinary challenges. This shared “behavioral language” has accelerated problem-solving, resulting in more innovative energy efficiency solutions and streamlined construction processes.

- **The “Invisible Ego” Program:** Our culture team launched this initiative to bridge our “Humility In, Pride Out” conviction with practical collaboration. By understanding individual triggers and communication styles, we’ve unlocked higher levels of creativity and faster progress on core innovation priorities.
- **Tailored Development:** We now use DiSC profiles to customize individual growth paths. This data-driven approach ensures we aren’t just filling roles, but building high-performing teams optimized for the work that matters most.

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.”



Building a Stronger Team Through Training

Our training programs are built on the belief that when people understand the “why” behind the work, results follow. This is reflected in our engagement data: we maintain an **overall engagement score of 86**, and **92% of employees** believe their coworkers are fully committed to the organization’s overall goals.

Expanded culture onboarding

We have expanded our new-hire culture training to a three-week immersion. This provides every team member with a deep grounding in our core convictions and the practical tools to make an immediate impact. This curriculum is now open to all current employees, ensuring our culture remains a living, evolving asset as we scale.

Compass 101: Building shared knowledge

Our professional development video series, Compass 101, expanded this year with new courses on our Operations Kit of Parts, Supply Chain and Negotiation. By providing cross-departmental visibility into how our business functions, Compass 101 serves as a catalyst

for collaboration. The results are clear: 93% of employees believe in Compass’ future success, proving that investment in shared knowledge builds long-term confidence.

Investing in our employees’ development

Compass’ commitment to continuous improvement applies inward too. In the past year, we’ve taken meaningful steps to give employees clearer paths to grow — professionally and personally.

Career Development Ladders

We launched a company-wide framework that maps advancement from entry-level through executive roles, giving employees in every department a visible, structured path forward. We piloted the program with engineering — a field where career progression in our industry is

often undefined — and are actively working to expand it across the company.

Leadership Development for Our Senior Leadership Team

We launched a new development program for our Senior Leadership Team (SLT) focused on the intersection of personal growth and organizational performance. Key modules include:

- Realistic Optimism: Navigating challenges with a solution-oriented lens.
- Empathy with Accountability: Leading with heart while maintaining high standards.
- Transparent Ownership: Taking full command of the leadership narrative.

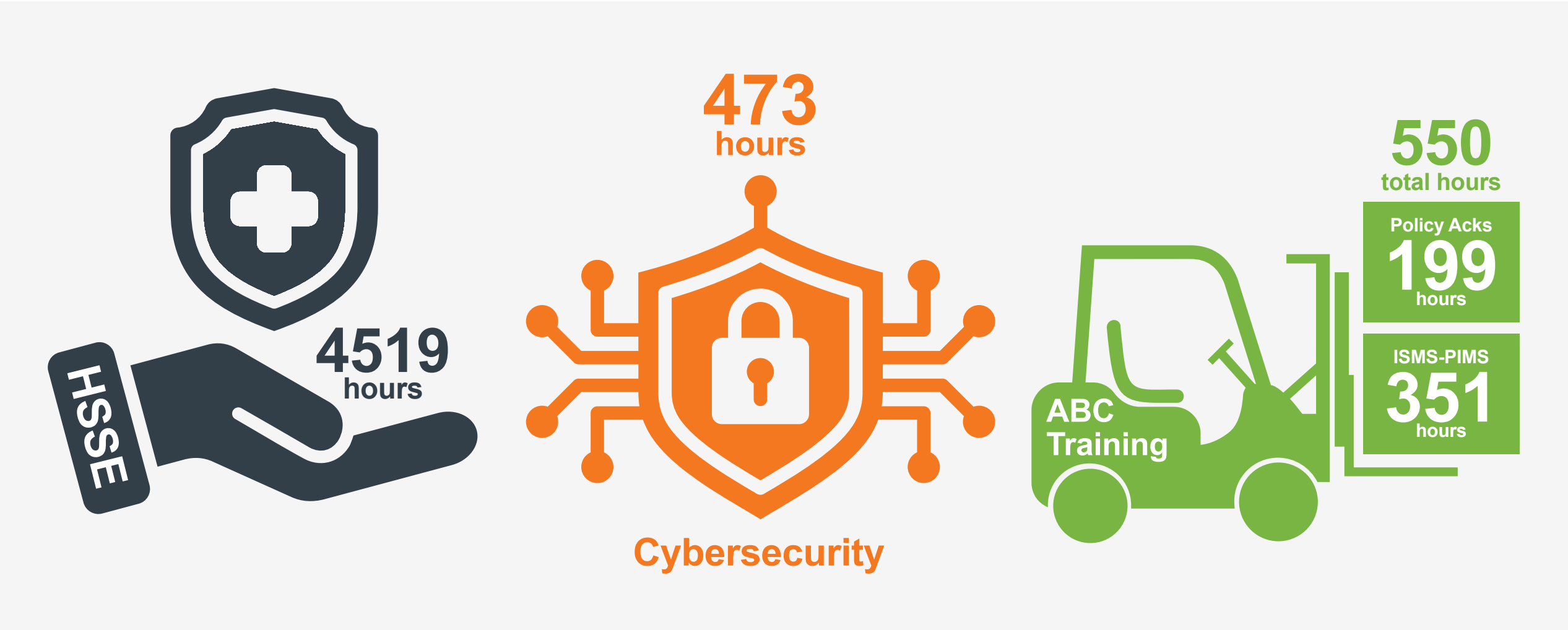
This program ensures our leaders continue to evolve, bringing the full weight of their capabilities to the teams they lead and the customers we serve.

These career development programs are powerful examples of Compass’ culture in action, and both will continue to grow in 2026.



Training hours

Employees + Contractors



HSSE (Health, Safety, Security & Environment), ABC (Anti-Bribery and Corruption) Training, ISMS (Information Security Management System) and PIMS (Privacy Information Management System)

Recognition That Reflects the Team We've Built

Compass' culture attracts strong people — and strong people do things worth recognizing. Each month, we celebrate team members making a measurable difference across the organization. Beyond our internal programs, this past year saw a number of Compassers earn meaningful industry recognition:

- **Muhammad Ikramullah, Senior SME for Mechanical Engineering**, was honored in the Dallas Business Journal's 40 Under 40 Awards
- **Michelle Almeida, Treasurer/VP of Corporate Finance**, was named a finalist for D CEO's Financial Executive Awards
- **Ryan Brewer, Finance Specialist**, was named a finalist for D CEO's Financial Executive Awards
- **Nancy Novak, Chief Innovation Officer**, was named to Capacity Magazine's 20 Women to Watch list
- **Jared Day, President and CFO**, was a finalist for the CFO of the Year Awards from The Tech Capital and D CEO Magazine
- **Chris Crosby, CEO**, was named one of the Top 50 CEOs by The Tech Capital and was also named to the Dallas 500 list of top business leaders in North Texas

These recognitions reflect the caliber of people our culture attracts and retains and the work they do every day.



An Industry Leader in Health & Safety Outcomes

Compass has a remarkable history of industry-firsts for worker health and safety that drive positive outcomes for the company and serve as models for the data center and construction industries as a whole. For nearly 15 years, Compass has been an industry leader in innovative design and construction techniques that create safer environments for workers. Over the last year, Compass has taken that to another level with new initiatives and milestones that make our commitment to health and safety even stronger and more impactful.

These outcomes are driven by our world-class safety team and an independent Environment, Health and Safety (EHS) body, which reports directly to our CEO. By collaborating daily with our construction and supply chain partners, we ensure that safety innovations are integrated at every level of our operations.

Empowering the workforce

Our most critical safety resource is our workforce. They play an indispensable role in identifying opportunities for improvement and turning those opportunities into measurable improvements. Over the past year, we have taken important steps to create more ways for our company to tap into their incredible insights, expertise and problem-solving abilities to drive continuous improvement in health and safety. Listening to and empowering our workforce is a critical success factor for Compass' success, and it is a blueprint for the entire industry.

Proven results

The success of this collaborative approach is clear in our data. In 2025, our Total Recordable Incident Rate (TRIR) decreased to 0.56 — a mere fraction of the national average for the construction industry.

The U.S. Bureau of Labor Statistics reports the construction industry average TRIR at approximately 2.5-3.0.



Empowering Leaders to Put Safety First

Our **Frontliners Program** is a powerful example of how Compass taps into the expertise of our workforce to drive positive outcomes for health and safety. This initiative empowers frontline supervisors at our construction sites to be influential advocates for safety enhancements, mental health awareness and operational improvements.

A global blueprint for construction

Launched in 2023, the program has now been successfully implemented across **all in-development Compass campuses globally**. By collaborating with our construction partners, we have moved beyond traditional safety oversight to foster a culture of collective problem-solving.

Driving continuous improvement

Over the past year, we have enhanced the program’s impact through:

- **Daily Frontliner Huddles:** Standardized huddles at every site promote clear communication, mutual support and rapid problem-solving.
- **Cross-Site Knowledge Sharing:** We’ve established channels to share best practices and “Huddle” insights across our global footprint, ensuring high-impact ideas travel faster.

- **Celebrating the “Unsung Heroes”:** Our **Frontliner of the Month** program highlights supervisors making significant contributions to their crews. By spotlighting these leaders, we give credit where it’s due and provide the industry with tangible examples of safety excellence.

These Frontliners embody the humility and teamwork essential to building tomorrow’s digital infrastructure. Their leadership is a primary reason for our record-low incident rates and continued project success.



Compass Celebrates Safety Week

Safety is our focus every day, but in May we put intensive focus on this critical issue with Safety Week, an organization-wide event involving our critical construction partners. In a fun and festive atmosphere, we engaged in demonstrations and drills to teach workers new skills, hone existing skills and practice new best practices that lead to a safe workplace. We also held mental health talks to continue to put a spotlight on the importance of wellness in the construction industry – an issue Compass has been a leader in for years.

A Special Event for World Mental Health Day

At Compass, we view mental health as a fundamental component of site safety and project success. It is a guiding principle for how we operate and a pillar of the Frontliners Program. We are active advocates for shifting the construction industry’s culture toward transparency and support for mental well-being.

Turning advocacy into action This year, Compass reaffirmed its commitment to this issue by hosting **Justin Azbill**, a renowned industry leader with over 30 years of expertise in mental health advocacy, at our ORD campus on World Mental Health Day.

Photo: Justin Azbill, a renowned industry leader with over 30 years of expertise in mental health advocacy, at our ORD campus on World Mental Health Day.

Rather than treating this as a standalone event, our Safety and EHS teams are actively integrating the insights from this session into our daily operations. By evolving our practices to better support the mental health of our workforce, we are building a more resilient, focused and effective team — proving that mental health is a critical success factor for modern infrastructure delivery.

AI-Driven Safety Enhancements

Compass is also harnessing the power of AI to enhance safety. We have deployed SmartTagIt technology – a safety-enhancing platform that drives continuous improvement of safety practices on work sites by identifying potential safety risks and recommending safety enhancements. Our use of that technology has taken a major leap forward in the past year, and it is producing impactful results.

In the past year, Compass elevated the SmartTagIt program into a central role in Frontliner Huddles. This elevated level of engagement with our workforce through SmartTagIt has created a continuous loop of data, insight and action that enhances safety. And these insights are not only shared across each campus but across all of our in-development campuses. This is a powerful example of how AI can augment the visibility and insight that our workforce has, leading to improvements that make a difference every day.

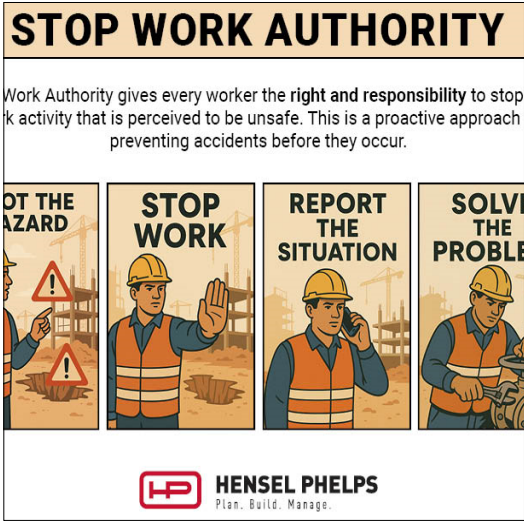


Driving Health and Safety in Other Innovative Ways

Compass is also driving positive outcomes for health and safety in a number of other ways. We are:

- Launching an Arc Flash Awareness Campaign to protect workers from the dangers of industrial power systems.
 - Gamifying safety through programs that bring fun and a competitive spirit to the process of learning, practicing and innovating new safety processes.
 - Formalizing processes to proactively mitigate fatigue-driven risks on construction sites.
 - Launching Reset Mondays on all of our in-development campuses to create weekly all-hands huddles that focus on safety practices.
 - Evaluating new technologies that will enhance safety-related visibility.
- Expanding the spotlight we will put on Frontliner heroes who are making an impact on health and safety.
 - Creating program templates for the industry that will allow other construction companies to establish Compass’ best practices on their work sites.

Our commitment to health and safety is something we are deeply proud of, and we are so excited about the additional progress we will make in 2026 and the coming years.



Building Futures in our Backyard:

The Mechanical, Electrical and Information Technology Data Center Pathway Program

The digital economy is expanding at an unprecedented pace, but behind the infrastructure lies a critical challenge: a talent shortage. To solve this, Compass is rethinking traditional recruitment by championing the “new-collar” workforce — careers that combine technical vocational skills with high-tech environments.

Pioneering a local pipeline

In 2025, Compass partnered with Texas State Technical College (TSTC) to launch the [MEI](#) (Mechanical, Electrical and Information Technology) Data Center Pathway Program. Located in the backyard of our Red Oak campus, this initiative provides 234 hours of hands-on instruction in a flexible 6- or 12-week format. To ensure financial hurdles didn't dictate human potential, Compass funded full scholarships for the inaugural cohort.

Industry-Wide Collaboration

We knew we couldn't build this pipeline alone. In true Compass fashion, we rallied our integrated partners — including Vertiv,

Schneider Electric, Siemens, Salute and CBRE — to help shape the curriculum and provide direct pathways to employment for graduates.

Measurable impact: Transformed lives

The results of this collaboration speak for themselves: **90% of the inaugural cohort secured high-paying jobs within one month of graduation.** These aren't just statistics; they are transformed lives. From the single mother transitioning from a service job into a high-tech lab to the veteran finding a vital new mission back home, we are proving that profound opportunity doesn't require leaving your community.

We design our data centers to last 100 years; we owe it to our neighbors to build a local workforce with that same resilience. By investing in new-collar talent, we are ensuring that as we power the future of technology, we empower the people who make it possible.



Unsung Heroes of the Digital World

A Conversation with MEI Grad Michael Carvalho

Compass: We were excited to welcome you as a Compasser in 2025. Your journey into the data center industry is a pretty wild story. After serving in the U.S. Navy, you faced some significant hurdles. What led you to believe a technical career might be out of reach?

Michael: “I served for 11 years in the Navy. It was a great experience. However, after a serious car accident during my service left me with a traumatic brain injury. I struggled with persistent brain fog and just lost my confidence. I spent years working whatever jobs I could find to support my family. I’d sort of given up. I didn’t think that continuing my education or ever having a technical career would be an option. I thought the operations and maintenance work I loved in the Navy was behind me, and that was the peak of my career.”

Compass: That changed when you discovered the MEI Data Center Pathway program. Can you tell us about that discovery and your journey in the course?

Michael: “I was working as a janitor in a data center, and I saw an ad for this program created by Compass and Texas State Technical College. It sparked something for me. The training focuses on the mechanical, electrical and cooling systems that power these facilities and I realized it closely resembled the aviation maintenance work I did in the military. I applied, got accepted and received a scholarship from Compass. Once I started, I realized those skills hadn’t disappeared; they were just buried. The hands-on training helped me rediscover my technical abilities and, more importantly, my confidence.”

Compass: You graduated with the first cohort in November 2025 and are now a multi-skilled operator at our Red Oak facility. How has this transition impacted your life outside of work?

Michael: “It’s been a total transformation. I’m not just rebuilding a career; I’m rebuilding my sense of purpose. Today, I’m helping prepare new data center builds and I eventually hope to become a site manager. But the biggest win is at home. This journey has made me a better father, husband and role model for my children. I’m showing them that even when things feel impossible, you can find a way back.”



Supporting Future Generations of Workers

Moonshot100 for the Boys & Girls Club of North Central Illinois

Compass sponsored the Boys & Girls Clubs of North Central Illinois' Moonshot:100 campaign, expanding access to vital youth programming. Partner-reported outcomes for the campaign show that 75% of participating club members improved their academic performance and 54% improved their school attendance.

Next Generation of Tradesman (NGT)

We were thrilled to come to know and support the NGT, whose mission is to educate high school students about skilled trades.



Preserving Open Spaces and Ecological Treasures

A Conversation with the Northern Virginia Conservation Trust (NVCT)

In 2025, the NVCT recognized the permanent protection of 14 acres of a rare ecological community on our site, abutting Goose Creek, a state-designated Scenic River and public water drinking source. 14 acres is roughly 10 football fields of permanently protected wilderness in one of the fastest-growing counties in Virginia.

Compass: What makes the 14-acre conservation area on the Compass IAD campus so significant for Northern Virginia?

NVCT: “At the NVCT, we often say that ‘conservation requires collaboration,’ and this partnership is a perfect example of that principle in action. By protecting these 14 acres at Compass’s IAD campus, we are permanently preserving a globally rare ecosystem known as the Northern Piedmont Mafic Barren. This landscape — characterized by exposed mafic rock, unique lichens and stunted trees — is a high-priority conservation site designated by the Commonwealth of Virginia. Because this land

sits within a Reservoir Protection Zone along Goose Creek, it serves as a critical buffer that protects a public drinking water source and acts as a natural floodplain during heavy rains.”

Compass: Beyond the rare geology, how does this project impact the local community and wildlife?

NVCT: “The community benefits from the preservation of open space in a region that is growing rapidly. This site serves as a vital corridor for wildlife navigating our interconnected waterways. Furthermore, Compass’ commitment goes beyond just ‘setting land aside’. They have committed a \$32,500 contribution to the NVCT and a long-term stewardship plan to remove invasive plants and prevent harmful overshading. This ensures that future generations can continue to enjoy the beauty of Northern Virginia’s landscapes while supporting the infrastructure our technological future requires. It is a true win for the environment and community advocacy.”



Photo: Mafic Barren is a rare exposed rock with unique plant communities

Preserving and Protecting Greenspace around our Campus

- **Total Open Space:** 71 acres of the 105-acre campus (more than 2/3 of the site) is dedicated to green space.
- **Protected Ecosystem:** 14 acres of globally rare Northern Piedmont Mafic Barren under permanent conservation easement.
- **Water Conservation:** 200-foot buffer created between development and Goose Creek.
- **Watershed Protection:** \$60,000 donated for future watershed protection and restoration in Loudoun County.
- **Public Amenities:** A walking trail featuring pollinator plants and a 550-foot landscaped berm along Sycolin Road.

Goose Creek Association (GCA)

In keeping with our care of this important ecosystem surrounding the IAD campus, we entered our third year as the top-tier, “Golden Goose” sponsor of the Goose Creek Association. The GCA supports vital programs like chemical and bacterial water monitoring in partnership with George Mason University, as well as volunteer-based initiatives that protect the Goose Creek watershed, a critical drinking water source for Loudoun and Northern Fauquier counties.



Meeting Needs of Our Neighbors, Creating Safe and Secure Futures

Breaking cycles of poverty

Fellowship Housing in Hoffman Estates empowers single mothers facing crisis by providing temporary, free and safe housing. As a Family Champion sponsor, Compass was able to support two single-mother families in the Hoffman Estates community. Our funding provides a “hand up, not a handout” to help moms break cycles of poverty and attain financial freedom through tailored, long-term goal setting, including career and housing goals.

Making Christmas merry

Partnering with Sundt Construction for the seventh annual Holiday Toy Drive, Compass helped collect nearly 3,000 toys, dozens of bikes and over \$4,000 in gift cards. These donations benefited local nonprofits serving families facing difficult circumstances, including OCJ Kids, Sojourner Center and A New Leaf.

Compass also served as a Platinum Sponsor for Mobile Hope’s Christmas Village, a multi-day community event to distribute holiday gifts, to underserved children and families in Loudoun County.

Seeing neighbors through hardships

Compass sponsored the Hope Fore Hoffman and Shenanigans on the Green events to help the Hoffman Estates Self-Help Fund to cover essential expenses (housing, utilities, food) for residents facing temporary emergencies.



Meeting Needs of Our Neighbors, Creating Safe and Secure Futures

Starting the school year off right

Compass supported the Red Oak ISD Education Foundation by sponsoring the district’s Teacher Convocation, celebrating teachers and supplying them with t-shirts, prizes and fun activities to get the school year off to a positive start. We also provided gifts to celebrate the district’s Top Hawks, shining a light on student and educators going the extra mile.

In Loudoun County, Compass was Mobile Hope’s Back-to-School Village platinum sponsor for a second year in a row. This annual initiative by Mobile Hope in Loudoun County provides school-aged children from low-income, at-risk or homeless families with essential supplies for the new school year.

Celebrating and supporting

Compass was a title sponsor for this fun, hometown fall celebration. While there, we partnered with Mentors Care — a local nonprofit — to conduct a snack drive throughout the festival, donating to a local after-school program so students who may not have dinner have a hearty snack every day.

Compass sponsored the Red Oak Firefighters Association Annual Fundraiser, directly supporting local public safety personnel and community emergency response initiatives.



Investing in the Future

A Conversation with John Knight (City of Red Oak)

Compass: John, you spent 28 years as a commercial banker before transitioning to economic development. How does that background influence how you evaluate economic opportunities for Red Oak?

John Knight: “I always joke that I’m the city’s banker now. As a commercial lender, I looked at business plans to see if they could repay a loan; in economic development, I look at the investment to see if it provides enough tax revenue to support the community. When we look at a data center, the capital investment is so massive. They’re really exceptional taxpayers, all while using very few city services. They pay a lot and ask for little.”

Compass: There is often a myth that data centers don’t contribute much to local employment. What has been the reality in Red Oak?

John Knight: “That is a major misunderstanding. While the building itself might not have thousands of direct employees, the ancillary employment is huge. We estimate three and a half jobs are created for every one job inside the data center — technicians for generators, AC and electrical components. A great

example is Schneider Electric, which built a 110,000-square-foot facility here with over 100 employees specifically to support the Compass campus. Plus, during construction, we have upwards of 1,000 workers eating at our restaurants, shopping, buying gas and plenty live here. Those additional consumers have helped us recruit national brands and sit-down restaurants to the city much sooner than we could have otherwise.”

Compass: What do these ‘dollars and cents’ actually mean for the quality of life for Red Oak residents?

John Knight: “It’s been an exponential increase for us. This land was previously ag-exempt, paying very low taxes. Now, Compass is on track to be our largest single taxpayer. For one thing, we’ve used that revenue to renovate our baseball fields. We’re able to host 30 tournaments a year with thousands of people eating, sleeping and shopping while they’re here. It’s been great!

Long-term, as this \$6 billion campus completes, we’re planning some improvements to emergency response services -- like a new fire station and

more firefighters. We’ll be able to improve roads, all while lowering the tax rate for our residents.

We chose Compass as a partner because we wanted projects that are good today and great tomorrow.”

Local Impact

- **Tax Base Growth:** The Compass campus is projected to be worth \$6 billion upon completion, nearly doubling the city’s 2024 total valuation of \$4.2 billion.
- **Job Creation Multiplier:** Every direct data center job is estimated to support 3.5 ancillary jobs for local contractors and vendors.
- **Infrastructure Support:** Data centers build their own substations and redundancy, which actually strengthens the local electrical grid.
- **Resource Efficiency:** Compass buildings use air cooling of closed-loop systems, meaning they do not tax the city’s water system.



Photo: John Knight, Assistant Director of Economic Development



Governance



Governance

Governance at Compass is grounded in stewardship. As a long-term owner and operator of critical infrastructure, we recognize that our decisions have implications beyond our campuses. This shapes how we interact with communities, manage shared resources and build trust over time. Strong governance ensures that we operate responsibly and transparently.

Our approach emphasizes accountability and foresight. Rather than treating governance as a compliance exercise, we focus on anticipating risk, strengthening resilience and evolving our policies to reflect changing conditions and expectations. This long-term mindset helps us make decisions that support reliable operations today while safeguarding the interests of our neighbors, partners and stakeholders well into the future.

With the backing of long-term investors Ontario Teachers' Pension Plan and Brookfield, governance is deeply embedded in Compass' culture and decision-making. It guides how we manage risk, uphold ethical standards and protect the physical and digital infrastructure entrusted to us. This reinforces our role as a responsible operator and a committed, long-term presence in the communities where we build.



Risk and Compliance

Compass Datacenters takes a proactive, enterprise-wide approach to risk management, designed to protect capital, strengthen operational resilience and support the long-term interests of our customers, lenders and capital partners. Our Enterprise Risk Management program identifies, evaluates and mitigates risk exposures across the full asset lifecycle – from development and construction through operations and financing. Risk is not managed in isolation; it is embedded across functions through cross-functional assessments, risk dashboards and formal reporting that provide ongoing visibility into key exposures and the actions taken to address them. Our insurance portfolio is actively managed to ensure coverage remains aligned with our risk profile and financing obligations at all times.

Our compliance program is built on internationally recognized standards, including ISO 27001, ISO 27701, SOC 2 Type 2 and PCI DSS. These certifications are maintained across our global operations and are not treated as one-time achievements – they are sustained through continuous monitoring, structured audit cycles and a dedicated Compliance team responsible for independent evaluation of controls, processes and risk management practices. This systematic approach ensures that our information security, privacy and operational controls meet the expectations of customers, regulators and external auditors on an ongoing basis.



Climate Risk

Climate-related risks and opportunities are recognized as material considerations for Compass, with implications for our operations, workforce and the communities where our campuses are located. As a result, climate risk receives focused governance attention and is overseen by our SVP of ESG & Innovation and Chief Technology Officer, with shared responsibility across the executive team and senior management.

Climate considerations are also integrated into Board-level discussions, informing business strategy, risk management practices and long-term planning. This shared oversight structure ensures that climate risk is addressed holistically across decision-making, performance management and operational execution.

To strengthen our understanding of climate-related impacts, Compass completed a portfolio-wide climate risk assessment in 2024. This assessment evaluated both physical and transition risks relevant to our sites and operations, helping us identify where climate-related factors may affect our business and the communities we operate in.

Top Physical Risks

- 01. Extreme heat
- 02. Precipitation (storms)
- 03. Wildfire
- 04. Flood
- 05. Drought

Top Transition Risks

- 01. Changing perceptions of company activities
- 02. Market uncertainty
- 03. Changing energy mix
- 04. Government climate policies
- 05. Climate disclosure regulations



The results of this assessment inform ongoing risk management and design considerations as we continue to adapt to changing environmental conditions.

Business Ethics & Integrity

At Compass, business ethics are rooted in transparency, accountability and respect for the people and communities connected to our work. As a long-term owner and operator of critical infrastructure, we believe ethical conduct is essential to building trust across our organization, with our partners and in the places where we operate.

Our Code of Conduct applies to all employees and sets clear expectations for how we conduct business globally. These expectations extend to our vendors and third-party partners, who are expected to align with our values and uphold high standards of integrity, human rights, inclusion and responsible citizenship. We view ethical behavior as a shared responsibility and an essential component of strong, durable relationships.

To support this commitment, Compass maintains a comprehensive Business and Vendor Code of Conduct designed to promote ethical practices and ensure 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 and assets and acting as a responsible global citizen.

We also enforce a strict Anti-Corruption and Third-Party Relationship Policy that prohibits bribery, kickbacks or any form of corruption, whether direct or indirect. These expectations are communicated clearly and consistently, reinforcing a shared standard of ethical conduct across our value chain.

Oversight of business ethics and integrity is embedded within our governance structure, with accountability shared across leadership and supported by Human Resources. Compass is aligned with the UN Guiding Principles on Business and Human Rights, which inform how we engage with employees, suppliers, customers and communities.

We recognize the importance of identifying and addressing potential adverse human rights impacts across our operations and value chain. When risks or impacts are identified, we are committed to taking appropriate action to resolve issues and reduce the likelihood of future harm, reinforcing a culture of integrity that supports long-term, responsible growth.



Anti-Bribery & 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.



Cybersecurity & Privacy

Cybersecurity

Cybersecurity is central to how Compass designs, operates and protects its data center campuses. Safeguarding systems and maintaining reliable access are top priorities, ensuring customers and stakeholders can depend on Compass infrastructure at all times.

Compass’ IT policies and procedures are designed to safeguard the confidentiality, integrity and availability of information across our operations, including customer data, vendor relationships and all services related to space, power, environmental controls and physical security within our facilities. We work alongside a dedicated cybersecurity services firm to oversee and manage cyber and third-party risk across the organization. Our cybersecurity risk management program is built on the NIST 2.0 framework, providing a rigorous foundation for addressing the demands of an increasingly complex regulatory and threat environment. We employ a comprehensive approach to identifying and mitigating both first- and third-party risks, with particular focus on the secure integration of IoT/OT systems. Through a deliberate and strategic methodology grounded in industry-leading best practices, we continuously refine

our tools, processes and controls to stay ahead of an evolving landscape.

A dedicated cybersecurity committee drives proactive risk oversight, deploys advanced solutions and works to continuously strengthen our security posture. All employees complete mandatory cybersecurity awareness training as a cornerstone of our security-first culture. To further sharpen organizational readiness, we conduct multiple incident response exercises throughout the year — ensuring our teams are practiced, aligned and prepared to respond swiftly and effectively to any cyber threat.

In 2025, we also upgraded our threat detection capabilities by moving to an automated platform that leverages AI for advanced monitoring. Unified Security Operations gain visibility via a ‘single pane of glass’ for better data correlation. Providing a secure, stable environment includes layered physical and digital protections such as alarm systems, uninterruptible power supplies (UPS), backup generators, high-speed network connectivity, 24/7/365 operator coverage and regular penetration testing. Together, these measures support operational continuity and help protect customer systems and data.



Cybersecurity & Privacy

Privacy

Compass is committed to respecting and protecting the privacy of our stakeholders. Our [privacy policy](#), available on our website, outlines how personal information is collected, used and processed.

We maintain compliance with recognized industry standards, including PCI DSS, SOC 2, ISO 27701 and ISO 27001, reinforcing our commitment to responsible data handling and privacy protection across our operations.



Awards & Recognition

Compass engages across the industry through memberships, governing bodies and leadership roles — ensuring our voice and values are part of the conversations that matter.

Industry Memberships:

- 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
- DCFlex
- Nomad Futurist Foundation – Visionary Sponsor

Company Recognition

- In 2025, Compass earned recognition across the industry for the work that defines us — innovation, sustainability and built-to-last vision.
- Financial Times/Statista: America’s Fastest Growing Companies 2025 – Ranked #106
 - Longhorn 100 2025 – Ranked #11
 - Inc. 5000 – On the list for the ninth consecutive year, ranked #982
 - Dallas Business Journal: Fast 50 Middle Market Award 2025
 - Data Cloud Awards: Innovation Award – jointly with Vertiv for Vertiv™ CoolPhase Flex
 - Schneider Electric Sustainability Impact Award 2025
 - D Magazine Innovation Awards: Finalist, Innovation in AI and Machine Learning
 - ICMA® Platinum Medallion

Individual Recognition

- Muhammad Ikramullah, Senior SME for Mechanical Engineering, was honored in the Dallas Business Journal’s 40 Under 40 Awards
- Michelle Almeida, Treasurer/VP of Corporate Finance, was named a finalist for D CEO’s Financial Executive Awards Outstanding Chief Accounting Officer, Controller or Treasurer category
- Ryan Brewer, Finance Specialist, was named Emerging Leader in Finance for D CEO’s Financial Executive Awards
- Nancy Novak, Chief Innovation Officer, was named to Capacity Magazine’s 20 Women to Watch list
- Jared Day, President and CFO, was a finalist for the CFO of the Year Awards from The Tech Capital and D CEO Magazine
- Chris Crosby, CEO, was named one of the Top 50 CEOs by The Tech Capital and was also named to the Dallas 500 list of top business leaders in North Texas



Appendices



Note: GHG emissions are expressed in units of CO₂ 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, where required.

Whenever possible, measured data were used to calculate GHG emissions. Where data was unavailable, a consistent and rigorous estimation methodology was used. All estimations were done using customized average energy intensity values calculated in 2025 for power, diesel, HVO and refrigerant losses. This was deemed appropriate since Compass data centers are modular and have similar profiles.

The estimated energy use in 2025 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 emissions from backup generators, using either diesel or HVO 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. Fuel consumption from data center backup generators was collected from internal meters. To determine the ratio of fuel used at each site, purchase orders of HVO and traditional diesel were collected as well. 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. In 2025, Compass worked with our HVAC servicing partners to better distinguish between true refrigerant leaks and refrigerant

that is removed and recovered. We were able to collect historical data for 2023, 2024 and 2025, excluding refrigerant recovered and responsibly disposed of by our partners. Due to this material change in data collection, we have restated our scope 1 emissions for all reporting years. Refrigerant leaks were tabulated to determine losses and calculate fugitive emissions according to the following equation:

$$\text{Fugitive emissions (scope 1) tCO}_2\text{e} = \text{kg of fugitive emissions} \times \text{tons of CO}_2 \text{ equivalent per kg of R-410 A}$$

$$\text{Diesel emissions tCO}_2\text{e} = \text{total diesel consumed (gal)} \times \text{tCO}_2\text{e per gal of diesel}$$

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. Backup generators are now fueled with either traditional diesel or HVO. It was assumed that the ratio of fuels purchased in 2025 at each building was the ratio of fuels burned. Wherever real data was unavailable, average 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.

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 materials for 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

Compass has been working with its upstream supply chain to quantify the embodied carbon of its construction materials and equipment. We have completed a whole-building LCA using supplier data for our prototypical building to reduce estimations in our scope 3, category 2 emissions reporting and to showcase efficient building processes.

This LCA includes the complete building envelope and structural elements, including the material components of footings and foundations, structural floors and ceilings. A separate analysis was performed, including certain mechanical and electrical equipment.

Material quantities

Building material take-offs were taken from prototypical drawings and specific sites. Priority materials – materials with high quantity and/ or high total embodied carbon emissions – were identified. The suppliers for these priority materials were contacted to provide emissions and quantity data for each material.

Emissions Factors

For each manufacturer, Compass gathered third-party verified product-specific EPDs for each material. If a third-party EPD was unavailable, or the manufacturer was inconsistent across all projects, an industry-average EPD was used. For key mechanical and electrical equipment, third-party-verified EPDs were prioritized. If unavailable, LCAs, embodied carbon declarations and TM65 were gathered as part of Compass’s supplier engagement initiative. If TM65 was not available then an estimate was calculated from similar equipment with EPD data, or the EPD was used as proxy for the actual product.

This LCA generated an emission factor which we used to more accurately estimate emissions from construction materials in 2025.

Scope 3 category 2 tCO₂e = sum of floor area constructed in reporting year x product stage embodied carbon per floor area⁵

Assumptions

- Product stage (A1-A3) embodied carbon intensity for data centers = 566 kg CO₂e/m² or 53 kg CO₂e/ft².
- When TM65 was used, lifecycle stages A1-A4 were considered. The impacts of A4 are minimal and do not have a significant impact on the overall LCA results.
- 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.

⁵ “Floor area constructed” refers to the total floor area of the data center upon completion.

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 tCO₂e = total electricity consumed (kWh) x tCO₂e per kWh electricity

Emissions intensity for scope 3, category 13 was calculated using metered average power consumption (MW) at the building and IT level. This constitutes a material methodology change, and historical data were collected for 2023 and 2024 to ensure year-over-year comparability.

Assumptions

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 2025. As of 2026, data coverage for electricity and fuel consumption will be complete.



OUTCOMES

www.compassdatacenters.com