

**5 CRITICAL STEPS**  
**DATA CENTER**  
**OPERATORS NEED**  
**TO COMPLY WITH**  
**SEC CLIMATE**  
**DISCLOSURE RULES**



FACT SHEET  
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Disclosures: I**

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# ESTABLISH A FRAMEWORK

- **Assign Responsibility:** Designate a team or individual responsible for overseeing climate-related disclosures and compliance.
- **Develop Policies:** Create and implement policies that support climate-related risk management and disclosure practices.
- **Engage Stakeholders:** Involve key stakeholders, including executives, board members, and external advisors, to ensure comprehensive and accurate reporting.



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Data Cen

Average Delta T

20°C



Energy Consumption

972

GWh



Total CO<sub>2</sub>

895

kt(CO<sub>2</sub>e)

Server Utiliz

49

# MEASURE AND MONITOR CLIMATE IMPACT

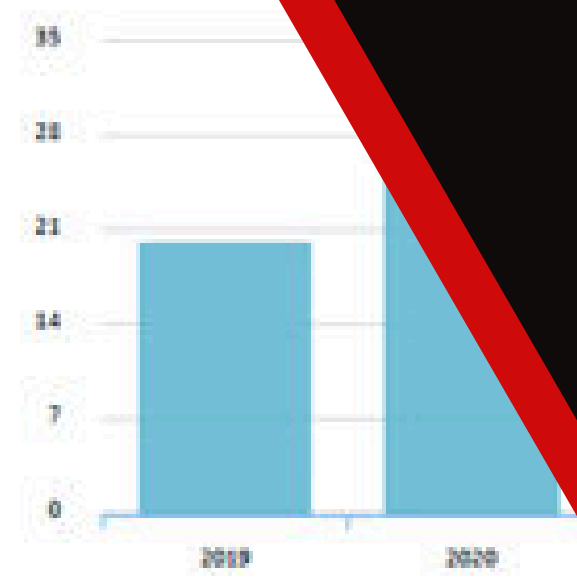
- **Inventory Emissions:** Conduct a thorough inventory of your GHG emissions, including Scope 1 (direct), Scope 2 (indirect from energy), and Scope 3 (other indirect emissions) emissions.
- **Set Targets:** Establish clear, measurable climate goals and targets based on your emissions data.
- **Implement Monitoring Systems:** Use technology and software to monitor and track emissions and other climate-related metrics continuously.

# DEVELOP AND IMPLEMENT MITIGATION STRATEGIES

- **Energy Efficiency Initiatives:** Implement measures to reduce energy consumption, such as upgrading to more efficient hardware, optimizing cooling systems, and adopting renewable energy sources.
- **Sustainable Practices:** Incorporate sustainable practices in operations, supply chain management, and waste reduction.
- **Adaptation Plans:** Develop plans to adapt to potential climate-related risks, such as extreme weather events or regulatory changes.



Renewable  
 This metric  
 50600-4-8-2022  
 The Renewable  
 renewable energy  
 leveraging a diverse



	2019	2020
United Kingdom	20	25
London	20	25
UDC1	20	25
UDC10	20	25
UDC11	20	25
UDC12	20	25
UDC13	20	25
UDC14	20	25
UDC15	20	25

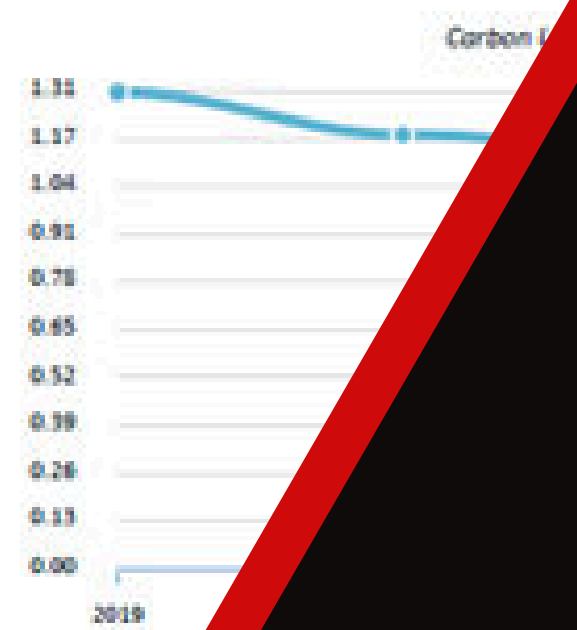
**Carbon Usage Effectiveness (kg(CO<sub>2</sub>e)/kWh)**

This metric is required to be reported by the Energy Efficiency Directive and 50600-4-8-2022.

Carbon usage effectiveness (CUE) is defined as the Total CO<sub>2</sub> emissions divided by equipment energy.

CUE addresses data center-specific carbon emissions, which is an important part of the operation of these facilities today and in the future. CUE, combined with other metrics, can help determine the relative sustainability of their data centers and determine if any improvements can be made. The CUE metric was developed in 2010 by The Green Grid.

Reference: <https://www.thegreengrid.org/>



# REPORT AND DISCLOSE

- **Prepare Disclosures:** Compile your findings and data into a comprehensive report that meets SEC requirements. Ensure the report includes your GHG emissions, climate-related risks, governance practices, and mitigation strategies.
- **Review and Audit:** Have your disclosures reviewed and audited by internal and external parties to ensure accuracy and compliance.
- **Submit and Communicate:** Submit the report to the SEC within the specified deadlines. Communicate your climate-related initiatives and disclosures to stakeholders, including investors, customers, and the public.

# WHEN YOU'RE READY TO TAKE YOUR DATA CENTER TO THE NEXT LEVEL OF SUSTAINABILITY, WE'RE READY TO HELP.

