



Tract's Environmental, Social, and Governance (ESG) Policy

Version II, February 2024

Introduction and Firm Overview

Tract (Landco) I, LP ("Tract" or the "Partnership") acquires vacant land in the United States appropriate for digital infrastructure and prepares that land for data center development.

Tract is led by an experienced group of data center and digital infrastructure experts determined to be a catalyst for sustainable land use with an intentional focus on data center planning and integration into local communities. Tract's intention is to prepare the land and horizontal infrastructure for its trusted end users and to ensure development is targeted for the optimal locations to maximize the revenue and economic development benefits for the community, while being good stewards of the land and minimizing the impact on neighbors.

Purpose Statement

Tract takes seriously its impact on the environment and society and is committed to socially responsible behavior throughout its development activity and in its relationships with all stakeholders. To effectively execute on this commitment, Tract works to ensure it applies appropriate levels of governance to the way its business is run both tactically and strategically, and takes into consideration the Environmental, Social, and Governance (ESG) expectations of its various constituents. This policy reflects Tract's general framework for integrating ESG considerations in its development activity and investments. This policy is regularly reviewed by Tract's Senior Team, not less frequently than annually, and is augmented and updated as necessary.

Scope of Policy

This policy reflects the framework that Tract uses to integrate ESG considerations into its development activity and its investment lifecycle, including its due diligence and development processes. This policy details Tract's mechanisms for ensuring adequate ESG governance and oversight throughout its development activity, both in its internal management systems and approach to investment and site development.

ESG Governance and Oversight

Responsible investment/development oversight, accountability, and implementation responsibility is executed at various levels within the Partnership under the supervision of its Senior Team, as outlined below.

Executive Oversight

Tract's Senior Team is ultimately responsible for overseeing ESG practices throughout the Partnership's activities. The Senior Team is comprised of the Chief Executive Officer, Chief Business Officer, Chief Investment Officer, Chief Technical Officer, Chief Financial Officer, Chief Legal Officer, Chief Innovation Officer, and Chief Energy Officer.

Investment Oversight

Tract's Investment Committee oversees implementation of responsible investment practices during all stages of the investment lifecycle. The Investment Committee meets weekly and is comprised of Tract's Chief Executive Officer, Chief Business Officer, Chief Legal Officer, Chief Investment Officer, and Chief Financial Officer.

Diligence Oversight

Tract's Development Steering Committee sets the parameters of diligence to be undertaken and provides strategic oversight to Tract's internal diligence team. The Development Steering Committee meets bi-weekly and is comprised of Tract's Chief Investment Officer, Chief Technical Officer, Chief Legal Officer, Chief Innovation Officer, and Chief Business Officer.

Tract's internal diligence team oversees the diligence process for evaluating all land being considered by Tract for acquisition. That team is responsible for engaging third-party experts to conduct specific diligence activities, project managing the diligence, and reporting concerns to the Development Steering Committee on a timely basis. The internal diligence team also provides a high-level summary of all diligence results to Tract's Diligence Steering Committee and presents all final findings to Tract's Investment Committee.

Design, Engineering, and Construction Oversight

Tract's Design, Engineering, and Construction Committee supports the creation of horizontal infrastructure to enable development on our land. The Design, Engineering, and Construction Committee meets bi-weekly and is comprised of Tract's Chief Investment Office, Chief Technical Officer, Chief Legal Officer, and Chief Business Officer.

Tract's internal design, engineering, and construction team oversees all horizontal infrastructure creation required to enable future data center development. That team is responsible for engaging engineering consultants and general contractors to provide support through the implementation of roadway improvements, wet and dry utilities, transmission and substation infrastructure, and any other site-specific development requirements. This internal team also provides a summary of the proposed developments to Tract's Investment Committee.

Tract integrates ESG considerations into the diligence and development processes through a customized approach for each investment. To maintain consistency and rigor, Tract maintains a comprehensive and broad list of potentially applicable, ESG-related diligence and development considerations that are reviewed for relevance and pursued as appropriate based on each investment's unique characteristics. The list of potentially applicable ESG considerations is reviewed and updated regularly to reflect the needs of the Partnership's investments and their surrounding communities. All ESG considerations are reviewed with the Board when seeking their approval to complete an investment.

Tract Management Company, LP (the "Management Company"), on behalf of Tract (LandCo) I GP, LLC, the General Partner of the Partnership (the "General Partner"), manages and controls all day-to-day decisions of the Partnership. The Partnership is further governed by a Board. The Tract Board meets on a quarterly, prescheduled basis, and on an ad hoc basis, as needed, to review and approve investments, divestitures, and various other defined decisions/actions of the Partnership.

The Management Company is governed by, among others, the terms of the Management Agreement between it and the Partnership's General Partner; the Partnership's Limited Partnership Agreement; and the Partnership's Delegation of Authority Policy, which is reviewed and approved by the Partnership's Board of Directors on an annual basis and governs how all investment acquisition and divestiture decisions are made.

ESG Integration in the Investment Process

Environmental Responsibility

Tract's target end users include hyperscalers (i.e., providers of scalable cloud computing, networking, and data storage services such as Meta, Google, Microsoft, etc.) and wholesale providers who build and lease data centers to hyperscalers. Many of Tract's target end users have made aggressive public environmental sustainability commitments. Tract's goal is to help its end users achieve those commitments by taking actions during its development activities to facilitate sustainable operations, such as working with solar developers to pre-position solar power and contracting for process/reuse water to be utilized on-site.

Tract is vigilant when conducting due diligence on the land it has contracted to acquire. As part of Tract's property diligence procedure, Tract engages third-party experts to conduct Environmental Site Assessments (ESA), threatened and endangered species studies, wetlands/waters of the US studies, floodplains/drainage studies, geological studies, cultural resources studies, and community impact studies. Additional diligence studies may be completed as applicable, based on site- and region-specific environmental considerations. Tract uses its diligence findings to determine whether to acquire the land, to ensure the preservation of cultural and historical resources that may be present, and to inform compliance with applicable laws as they relate to Tract's improvement of acquired land. These studies seek to identify all threatened and endangered species and the environmental, cultural and community impacts that could be caused by Tract's improvements or its end user's developments.

Tract is thoughtful in its approach to provide horizontal infrastructure for its acquired land. During construction, Tract prioritizes the use of recycled and locally sources materials to reduce transportation- related emissions. When possible, Tract utilizes prefabrication and modular construction methods to minimize material waste, enhance construction efficiency, and reduce the overall environmental footprint. Tract also implements waste reduction strategies by creating construction waste management plans and promoting the recycling/reuse of construction materials. In addition to these construction practices, Tract implements stormwater management plans during construction to prevent soil erosion and minimize water runoff to preserve local water quality.

Social Responsibility

Tract is committed to the health, safety, and well-being of the communities in which it owns land. In support of that commitment, when Tract contracts to acquire land, it puts in place a community outreach plan specific to each site and community. Examples of activities that may be included in this plan are: consultation with local and state government, Native American historical significance assessments, cultural resources studies, and other historical significance research to identify any concerns such as cemeteries, First Nation impacts, impacts to view sheds, etc. As a result of this outreach and the zoning and entitlement process, Tract has many opportunities to interact with the community and understand their concerns, if any, and how those concerns can be mitigated. As part of its community outreach, Tract also works to identify and communicate the benefits that can be created for the community, such as increased tax revenue, which can provide funding for schools, parks, community programs, and other benefits and often works to allocate portions of its excess land for community uses like parks, playgrounds and ballfields, or for additional buffering to ensure the characteristics of the surrounding area are preserved.

Governance

As previously noted, Tract's Diligence Steering Committee is responsible for thorough diligence and raising issues as appropriate. Findings are to be brought to the attention of the Investment Committee and Senior Team during Investment Committee meetings. Ultimately, the Senior Team is responsible for oversight and final decisions regarding Environmental, Social, and Governance issues. As Tract continues to grow this process will be evaluated as necessary.

ESG Integration in Tract's Operations

Environmental Responsibility

Tract strives for environmentally conscious activities as appropriate. Tract is headquartered in Denver, Colorado and provides a flexible working environment for its office-based employees and gives the opportunity to be permanently remote to other employees, as appropriate. Tract additionally leverages modern technology to ensure travel is reduced whenever possible and Tract's Denver office is equipped with LED lights and occupancy sensors to operate as energy efficiently as possible. These activities reduce Tract's environmental impact, but Tract is focused on continuing to find ways to lessen its impact.

Social Responsibility

Tract is dedicated to the health, safety, and well-being of its employees and their families. Tract is a committed, equal opportunity employer. Tract maintains a Diversity, Equity, and Inclusion Policy (DE&I) and aspires to cultivate and preserve a culture of diversity, equity, and inclusion. Tract believes very strongly that its human capital is its most valuable asset. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that its employees invest in their work represents a significant part of the Company's culture and directly impacts Tract's reputation amongst peers, end users, partners, and investors. Tract maintains written anti-harassment, anti-retaliation, disability accommodations, and religious accommodations policies in its Employee Handbook. Tract offers its employees a competitive suite of benefits, including health benefits, paid parental leave, and a 401k.

Health and Safety

Tract is focused on the health and safety of its employees and contractors. Tract's Employee Handbook includes a section on Employee Safety which outlines policies and procedures pertaining to safety conditions. The Employee Handbook points to prompt reporting and communication of any safety issues to the Safety Coordinator or Chief Legal Officer.

Tract considers the health and safety performance of contractors and third parties to be a high priority. As part of the contractor selection process, Tract inquires about contractor's safety records and reviews their Employee Health & Safety (EH&S) plan to confirm appropriate policies and procedures are in place prior to construction. This includes reviewing the contractor's safety culture, risk assessments, hazard mitigations, emergency preparedness, environmental management, communication and reporting, and compliance and audits. When evaluating different providers and aims to continue to add to the health and safety protocol,

as appropriate. As Tract's development activities move forward in connection with any investment, Tract will ensure that all contracts have an approved, written Health and Safety Policy governing all on-site activities involving Tract's investments.

Governance

Tract maintains a Code of Conduct, which addresses such topics as anti-corruption and bribery, and addresses other relevant topics in its Employee Handbook. The handbook includes Tract's Equal Employment Opportunity Policy; Diversity, Equity, and Inclusion Policy; Anti-Harassment Policy; Anti-Retaliation Policy; Religious Accommodations Policy; and Anti-Bullying/Abusive Conduct Prevision Policy. The Code of Conduct, the Employee Handbook and associated policies are acknowledged annually by all Tract team members and are reviewed annually by the Senior Team to assess if changes are needed.

Reporting and Transparency

Tract intends to report updates to its ESG program and approach, as well as other notable points, to the Board quarterly and to investors on an annual basis.

ESG Education and Training

Tract will continue to provide on-going ESG-related education and training opportunities to its employees on a regular basis. Training topics may include but are not limited to DE&I topics, health and safety, alternative energy, water efficiency, and ethics topics.