APPROVED
by Resolution of the Management Board
of AKASHI Data Center PLC
Minutes No. ADC-2026–94 dated 19.08.2026

ESG Policy of AKASHI PLC

1. Purpose and Scope

The purpose of this ESG Policy of Akashi (hereinafter, the "Policy") is to ensure the long-term sustainability and growth of the Company through the systematic management of environmental, social and governance (ESG) factors.

Implementation of the Policy is aimed at reducing operational and investment risks, improving the efficiency of resource use, ensuring predictability of operating results, and strengthening the Company's investment appeal.

The Policy takes into account the interests of key stakeholders, including shareholders, employees and external parties, and is aimed at creating a safe working environment, protecting business value, and conducting operations responsibly.

2. ESG Regulatory Framework

The Company conducts its activities in the field of environmental, social and corporate governance (ESG) in accordance with the applicable legislation of the Republic of Kazakhstan and AIFC acts, the Company's Charter and internal regulatory documents, the Company's obligations under its concluded agreements, and taking into account recognized international approaches and best practices in ESG and corporate governance.

When implementing projects, the Company ensures compliance with environmental expertise requirements, permitting documentation and other mandatory procedures, and takes into account the results of environmental impact assessments and public consultations.

The Company applies a systematic approach to managing environmental, social and governance risks at all stages of a project's life cycle: from planning and design through construction and operation.

3. ESG Principles

With respect to environmental and social aspects, the Company is guided by the following principles:

Priority of risk prevention

The Company seeks to identify and prevent environmental and social risks at an early stage, minimizing potential negative impacts before they occur.

Priority of safety

Ensuring the safety of employees, contractors and other participants in the Company's activities is an absolute priority in management decision-making.

Respect for human rights and non-discrimination

The Company ensures equal and respectful treatment of all employees and stakeholders, does not tolerate discrimination, victimization, harassment, violence or other forms of unacceptable conduct, and provides a safe means of reporting such cases in accordance with the Company's internal procedures.

Responsible use of resources

The Company ensures the rational and efficient use of natural, energy and other resources, seeking to reduce negative impact on the environment.

Compliance with requirements and obligations

The Company ensures compliance with applicable legislation, permitting documentation, internal regulations and assumed obligations.

Consideration of stakeholders' interests

The Company takes into account the interests of shareholders, employees, contractors, government authorities and other stakeholders in carrying out its activities and projects.

Engagement and openness

The Company ensures constructive engagement with stakeholders, including informing them of significant aspects of its activities and taking feedback into account.

Responsible procurement

The Company seeks to take environmental, social and governance considerations into account when selecting suppliers, contractors and equipment, giving preference to solutions that help reduce environmental impact, promote the rational use of resources, and support a sustainable supply chain.

Innovation and sustainable technologies

The Company seeks to apply modern engineering and digital solutions that improve the energy efficiency, reliability and environmental sustainability of its facilities throughout their life cycle.

Continuous improvement

The Company develops and improves its approaches to managing environmental, social and governance aspects based on practical experience and business needs. The Company ensures regular assessment of the effectiveness of its ESG management system, carries out monitoring and internal evaluation of its effectiveness, and, where necessary, engages independent experts and uses the results of such assessments to improve its activities.

With respect to corporate governance, the Company is guided by the following principles:

Protection of shareholders' interests

The Company protects the interests of shareholders through transparency of its operations, sound decision-making, and systematic management of risks affecting business value.

Governability and formalization of operations

The Company's activities are carried out on the basis of formalized business processes, regulations and procedures that ensure the reproducibility of decisions, control over execution, and the stability of the operating model.

Transparency and auditability of decisions

The Company ensures transparency and auditability of the process for making key management decisions, including the availability of justifications, approvals, and the recording of accountability.

Separation of powers and control

The Company ensures a clear allocation of powers and responsibilities among its governing bodies and officers, as well as the existence of mechanisms to control the adoption and execution of decisions.

Accountability and responsibility

Managers at all levels are responsible, within their authority, for the results of their activities, including compliance with this Policy, with regular monitoring and reporting in place.

Transparency of operations

The Company ensures the disclosure of material information about its activities to the extent necessary for decision-making by shareholders and other stakeholders, in accordance with the Company's internal regulatory documents.

Integrity and business ethics

The Company conducts its activities on the basis of integrity, fair competition, and rejection of corruption, conflicts of interest, fraud and other dishonest practices. The Company fosters a corporate culture based on compliance with the law, internal regulatory documents, and the principles of business ethics.

ESG Management System

The Company's environmental, social and governance (ESG) management system is part of its overall management system and is integrated into strategic planning, project implementation, and operational activities.

ESG management is carried out on the basis of the following principles:

- allocation of responsibility;
- integration into business processes;
- control and accountability;
- regular monitoring and improvement.

3.1. Role of the Board of Directors

The Company's Board of Directors:

- sets the Company's general strategic direction in the area of ESG;
- reviews key ESG risks and issues that may have a material impact on the value and sustainability of the business;
- oversees the Management Board's activities relating to the implementation of ESG approaches;
- reviews the Company's consolidated ESG reporting;
- ensures that shareholders' interests are taken into account in ESG-related decision-making.

3.2. Role of the Management Board

The Company's Management Board:

- defines and approves the approaches to implementing the ESG policy;
- approves, within its competence, internal documents and procedures in the field of ESG;
- reviews material ESG risks and makes decisions on them;
- oversees the integration of ESG requirements into the Company's operations;
- reviews regular reporting on ESG indicators.

3.3. Executive Management of ESG

The Management Board Member — Director of Strategy and ESG:

- ensures implementation of the ESG policy and the corresponding strategic decisions of the Management Board;
- organizes the development and implementation of internal regulations, procedures and tools in the field of ESG;
- ensures the integration of ESG requirements into business processes, projects and operational activities;
- coordinates the activities of business units on ESG matters;
- organizes the system for identifying, assessing and managing ESG risks;
- ensures the collection, analysis and presentation of ESG reporting to the Management Board and the Board of Directors;
- refers material ESG issues and risks to the Management Board for consideration;
- engages with shareholders, investors and other stakeholders on ESG matters.

The Company's business units ensure compliance with ESG requirements within their respective activities and cooperate with the Management Board Member — Director of Strategy and ESG on matters relating to the implementation of the Policy and related procedures.

3.4. Integration of ESG into Business Processes

ESG requirements are integrated into the Company's key processes, including:

- strategic and investment planning;
- design and construction of facilities;
- selection, evaluation and management of contractors;
- operational activities;
- the risk management system.

Management decisions take into account ESG factors that may affect:

- the sustainability of projects and the business as a whole;
- the safety of employees and contractors;
- environmental impact;
- the Company's reputation;
- business value.

3.5. Management of ESG Risks

The Company implements a systematic approach to managing ESG risks, which includes:

- identification of environmental, social and governance risks;
- assessment of their significance and prioritization;
- development and implementation of risk management measures;
- regular review and updating.

ESG risks are treated as part of the Company's overall risk management system and, where material, are referred to the Management Board for consideration.

3.6. Monitoring and Reporting

The Company ensures:

- the collection and consolidation of ESG indicators;
- regular monitoring of compliance with requirements and target indicators;
- the preparation of reporting for the Management Board, the Board of Directors and shareholders;
- the use of monitoring results in management decision-making.

3.7. Control and Internal Audit

Compliance with the ESG Policy is monitored by:

- the Company's Management Board;
- the Management Board Member — Director of Strategy and ESG;
- the responsible business units;
- where necessary, through internal audit procedures.

The results of such control are used to:

- identify deviations;
- develop and implement corrective actions;
- improve the ESG management system.

The Company conducts internal assessments of its ESG management system and, where necessary, arranges independent assessments (audits) to confirm the effectiveness of the management system, identify opportunities for improvement, and evaluate compliance with internal requirements and best practices.

4. Specialized ESG Documents and Procedures

In order to implement this Policy, the Company develops and applies separate internal documents, regulations and procedures governing the management of the environmental, social and governance aspects of its activities.

These documents form an integral part of the ESG management system and ensure the practical implementation of the principles and approaches set out in this Policy.

4.1. Risk Management

The Company develops and applies a separate document that defines:

- the procedure for identifying, assessing and prioritizing risks;
- approaches to developing and implementing management measures;
- the procedure for monitoring and reviewing risks.

This document is approved by the Company's Management Board and is subject to regular review.

4.2. Environmental and Social Responsibility

The Company develops and applies separate documents and procedures governing:

- management of environmental impact;
- occupational health and industrial safety;
- working conditions and employee relations;
- engagement with local communities.

These documents are approved by the Company's Management Board and are updated as necessary.

4.3. Stakeholder Engagement

The Company ensures systematic engagement with stakeholders on the basis of separate regulations, including:

- identification and classification of stakeholders;
- the procedure for engagement and disclosure of information;
- a mechanism for handling inquiries and complaints.

These regulations are approved by the Company's Management Board.

4.4. Corporate Governance and Protection of Shareholders' Interests

The Company maintains internal documents governing corporate governance matters, including:

- the procedure for interaction among the Company's governing bodies;
- procedures for preparing and adopting management decisions;
- the allocation of powers and responsibilities;
- requirements for information disclosure and transparency of operations;

- mechanisms for protecting shareholders’ rights and interests.

These documents ensure:

- transparency and auditability of management decisions;
- management’s accountability to shareholders;
- consideration of ESG factors in strategic and investment decision-making;
- reduction of management and reputational risks.

These documents are approved in accordance with the established procedure and are subject to regular review.

4.5. ESG Metrics and Reporting

To assess the effectiveness of its ESG performance, the Company develops and applies a separate document that defines:

- the list of ESG indicators (metrics);
- the procedure for calculating them and collecting data;
- target values and approaches to setting them;
- the frequency of monitoring and reporting.

This document is approved by the Company’s Management Board and is subject to regular review.

4.6. External Assessment of the ESG System

The Company seeks an objective assessment of the maturity of its ESG system, using recognized approaches, independent assessments, ESG ratings and other tools that help increase the transparency of its activities and the trust of stakeholders.

5. Mandatory Compliance and Control

This Policy is mandatory for all governing bodies, business units and employees of the Company, within their respective authority.

The requirements of the Policy must be taken into account in:

- management decision-making;
- the implementation of investment and operational projects;
- the development of internal documents and procedures;
- engagement with contractors and other counterparties.

The Company ensures that the provisions of this Policy are communicated to employees and, where necessary, to contractors and partners.

Compliance with the Policy is monitored by:

- the Board of Directors — in respect of strategic oversight;
- the Management Board — in respect of general oversight and decision-making;
- the Management Board Member — Director of Strategy and ESG — in respect of coordination, monitoring and evaluation of compliance with the requirements of this Policy, within their competence;
- the heads of business units — in respect of the implementation of requirements within their respective activities.

To ensure compliance with the Policy, the Company:

- conducts regular monitoring of compliance with established requirements;
- identifies deviations and violations;
- develops and implements corrective actions.

Failure to comply with the requirements of this Policy may result in measures being taken in accordance with applicable legislation and the Company’s internal regulatory documents.

6. Review of the Policy

This Policy is subject to regular review taking into account:

- changes in legislation;
- changes in the Company’s structure and operations;
- the development of ESG practices and approaches;
- the results of monitoring and the practical application of the Policy.

The Policy is reviewed as necessary, but not less than once a year.

The review may be initiated by:

- the Board of Directors;
- the Management Board;
- the Management Board Member — Director of Strategy and ESG.

The updated version of the Policy is subject to approval by the Company’s Management Board.