



# Community Engagement Policy

Jan 2022

# COMMUNITY ENGAGEMENT POLICY

## A. Commitment to local communities

Start<sup>®</sup> Campus mission is to design, build, and operate sustainable data centers and its supporting ecosystems for large cloud providers in Europe, bringing sustainability standards and value to the communities where it operates.

Start<sup>®</sup> Campus is currently developing the SINES 4.0<sup>®</sup> project – a €3,5 billion investment to deliver an Hyperscaler Data Centre with 495MW of server capacity, in Sines, Portugal.

It is one of the largest data center ecosystems in a premium secure European location, which is the perfect connectivity gateway to Europe and the world, powered by 100% green affordable energy.

Our main pillars are:

- **Robust site selection, ensuring each site has characteristics that can enable sustainability options and low-cost operation.**
- **Proactive engagement with local communities to understand how to best add value to the local area.**
- **Partnering with world-renowned data centre experts and companies.**
- **Hiring talented people that embrace new ideas, challenges and live our values.**
- **Work with forward-thinking clients that want to make change happen.**

We are fully committed to develop and strengthen local communities in which our projects operate.

As such it we have structured a Community Engagement Policy as a cornerstone of our activities, aiming to:

- **Integrate local communities as a core element of strategic decisions that relate to the value creation and sustainability of our projects.**
- **Address the needs of local communities, by ensuring highest ethics transparency codes of conduct and employee well-being standards and ongoing support to local initiatives.**
- **Promote the best community engagement practices by regular stakeholder listening, mapping and engagement, ensuring that initiatives match their specific needs.**
- **Co-create community initiatives with local stakeholders, ensuring a participatory approach in decision-making and projects on the ground.**

This Community Engagement Policy is our core, and it is a commitment that we adopt as part of its ethical and sustainable business.

## B. Local communities are a core element of Start Campus

We invest in infrastructure projects that bring to the community qualified employment, skills training, economic development, and technological opportunities. We're fully committed to ensure that the local communities of our projects' sites and adjacent areas benefit from the socio-economic opportunities.

This community give-back commitment is reflected in the following principles towards local communities:

- **Regular and ongoing listening of local stakeholders, their needs, priorities, and concerns. These include local NGOs, non-profit organisations, academic and other educational institutions, business associations, municipalities, boroughs and parishes, civil society organisations, amongst others.**
- **Constant matching between the needs of local communities and local community engagement activities, ensuring that all activities are fit for purpose.**
- **Creation of clear and straightforward communication channels between local community stakeholders and the projects.**
- **Annual reporting of community engagement activities, including transparency over the results achieved and funding amounts.**
- **Co-creation and decentralised decision making over community engagement initiatives.**

## C. Thematic areas for community engagement

Based on initial stakeholder engagement activities with local communities around our operation area, we have consulted a broad group of local stakeholders and prioritised main areas of concern for the project set-up. These thematic areas are compared with international best practices and assessed according to other similar projects across the world.

Our thematic areas of focus form the basis of our community engagement strategy, ground activities and funding decisions.

### Thematic area 1: Regional economic development

Create positive spill overs on social and economic benefits deriving from an infrastructure project. It entails the promotion of sustainable landscape in the region, entrepreneurship initiatives, contribution towards up and re-skilling of local populations aiming to improve employability, as well as the focus on training and skills development in relevant areas of expertise.

### Thematic area 2: Improving the overall quality of life in the regions where we operate

We will promote and foster a range of topics perceived by local communities as critical tenets to improve local infrastructure that could benefit the community at large. These may include initiatives that support low-carbon energy transition, contribution to health-related infrastructures as well as other local services deemed relevant by local communities.

### Thematic area 3: Biodiversity and land conservancy.

A priority area as to ensure any local infrastructure projects abide by the highest standards for environmental policies and compliance mechanisms.

## D. Approaching community engagement to meet specific needs

After the stakeholder consultation phase, which was key in identifying priority areas, we are taking two main approaches, each with their own annual plan of activities and community funding:

### 1. Support initiatives that have strategic relevance to the region where we operate.

These include projects co-created with local communities that respond to local needs, including entrepreneurial initiatives, that can be funded or co-funded by us according to a structured call for proposals.

### 2. Developing Start Campus branded projects in areas of relevance for our project's operation.

These can be developed in the following five pillars of initiatives and projects:

- a. **Educational initiatives (around several topics, from renewable energy, data and connectivity, or other directly related areas of the project's region).**
- b. **Environmental.**
- c. **Social**
- d. **Entrepreneurship**
- e. **Sustainability**

To implement these two different approaches and adopt a complete overview of community engagement activities, we have developed a community engagement mechanism named SINES 4.0<sup>®</sup> Community Platform for our project SINES 4.0<sup>®</sup>.

Through this platform, we ensure that we are adopting day-to-day operations mitigation actions. Initiatives with strategic relevance to the region are covered by an annual call for proposals, which engages with local communities to propose and develop projects that are eligible for funding and support. SINES 4.0<sup>®</sup> Community Platform gives us the structure needed to implement its educational projects across schools in the region around SINES 4.0<sup>®</sup> project.

As a result, SINES 4.0<sup>®</sup> Community Platform serves as the umbrella structure through which community activities are developed, supported, funded, and co-implemented, accordingly.

<sup>1</sup> In response to the public concerns of the tourism sector being affected by the artificialization of the landscape, Start Campus can use this opportunity to support initiatives that promote sustainable and nature tourism in the region (e.g., cycleable rural roads, walking routes through historical sites, educational programs towards fauna and flora preservation). Faial island in the Azores has an interesting [case study](#) where the local population is dedicated to the preservation of Cagarros, being their observation one of the main (and most recent) touristic activities of the region.