




The data centre company

External Grievance Mechanism

External version

Relating to:

Raxio's Data Centres

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1. INTRODUCTION

This document outlines Raxio's external grievance mechanism, the process for receiving, acknowledging, investigating, resolving, and closing external complaints and grievances (hereafter called “complaints”). Raxio views complaints as an important part of managing impacts and encourages external stakeholders such as community members to submit concerns as they arise. In this way, the grievance mechanism serves as an integral part of Raxio’s approach to external stakeholder engagement and risk mitigation.

Grievances received by Raxio provide opportunities to inform and improve how the Company conducts business and to learn lessons so that conditions which could lead to similar complaints are prevented in the future. Raxio is committed to a consultative, fair, and equitable working relationship with community members who express concerns. Raxio is also committed to ensuring that no complainants will be subject to retaliation by either Raxio or other stakeholders such as fellow community members when they voice their concerns and participate in the grievance resolution process.

This document outlines the procedure, including the steps Raxio takes to address external grievances. With Portuguese and French being the two significant other languages at our sites, a copy of this policy has been made available in these languages.

2. REFERENCE DOCUMENTS

- IFC Good Practice Note - Addressing Grievances from Project-Affected Communities (2009)
- CAO Grievance Mechanism Toolkit
- UN Guiding Principles for Business & Human Rights
- PIDG’s Gender-based Violence and Harassment (GBVH) reporting guidance for project companies


3. SCOPE OF GRIEVANCES

A person or group can make a complaint if they believe that Raxio's activities are having an impact on them, the community at large, or the environment.

Raxio will evaluate all cases received and will provide a response. Some cases may be related to factors not connected to Raxio. In these cases, Raxio will send a written explanation of why it feels the complaint does not require further action by Raxio. In all other cases, Raxio will investigate the case and determine whether Raxio is responsible for or has contributed to the issues that led to the grievance. If the investigation finds Raxio has failed to comply with the standards to which it is legally held and/or to which it has committed, or if finds there are unintended or unforeseen impacts that have not been properly mitigated, Raxio will identify options for resolution and present an approach to the complainant and will further work to identify measures that could prevent the issue from recurring.

4. REGISTERING A GRIEVANCE

Grievances are accepted verbally or in writing. There are several ways external stakeholders can register a grievance:

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- Place it into the physical dedicated box located at every and each site.
- Contact the site during normal business hours.
- Call the Company office and speak to a Company representative during office hours or leave a message.
- Send a message to the dedicated email complaints@raxiogroup.com (received by CEO, CFO, Head of HR and Head of Legal)
- Send an anonymous grievance via the form on Raxio’s website
- Send a physical letter to one of Raxio’s sites or offices.

The local site shall make clear the ways available to receive grievances and shall identify the best ways to facilitate the communication with the complainants.

The complainant should provide as much information about the concern as possible when presenting the complaint, including copies of any relevant documents or photos.

5. DESCRIPTION OF THE PROCESS AFTER A GRIEVANCE HAS BEEN RECEIVED

In some instances, such as when a complaint is more of a question or request for information, Raxio may be able to resolve it shortly after it is received. In this case, the complainant will be given the information necessary to address the issue, and the complaint will be documented and closed once the complainant is satisfied with the information offered.

When complaints are more complex and require some investigation, the following process will be used:

Step 1: Receive & Acknowledge Complaint

Once Raxio receives the complaint, it will be recorded in a register.

Raxio will acknowledge receipt of the complaint by letter within 7 working days of receipt.

The acknowledgement letter will specify a contact person within Raxio and a description of what the complainant can expect next, including a timeline.

Step 2: Evaluate, Assign Owner, and Investigate

Raxio will assess the complaint to determine how it should be managed and, in most instances, will assign an owner with the substantive expertise to resolve it. The complaint owner will work to understand, investigate, resolve, and follow-up with the complainant. This may involve seeking information from different departments within Raxio or from contractors. Depending on the allegations and people involved, the investigation may be referred to an external investigator to conduct an impartial investigation.

Raxio will work with the complainant to understand the cause of the issue and will need to contact the complainant during the investigation.

Step 3: Consult on and Implement Resolution

Once the complaint has been investigated, in consultation with the complainant, Raxio will discuss the results and proposed resolution with the complainant, including a timeline for implementation. The investigation must be completed promptly, generally within 30 working days or less, unless extenuating circumstances (i.e., illness, complex investigation) warrant a more extended investigation.

Raxio will implement the resolution either directly or through a third party, which will be done in consultation with the complainant.

Raxio will review complaints regularly to ensure progress is being made towards resolution. If no progress is being made, Raxio may decide to escalate the complaint to Raxio management. In such circumstances, the complainant will be updated on progress.

Step 4: Close and Monitor

After the complaint has been fully investigated, the resolution has been implemented and monitored, and no further action is deemed necessary to resolve the issue, Raxio will close the complaint.

Raxio will ask the complainant to sign a statement to acknowledge resolution. Signing the statement does not preclude the complainant from raising the issue again, or seeking other avenues for redress should the resolution not result in a permanent fix or the issue recurs.

If the complainant does not agree with the resolution offered, Raxio will close the complaint. The complainant may choose to appeal the decision to close the complaint (see Step 5) or seek other recourse.

Raxio may re-open the complaint if the complainant provides new information.

Raxio may contact the complainant after closure to ensure no other problems have arisen.

Step 5: Appeal (optional if complainant is not satisfied)


Raxio has established an additional mechanism for external stakeholders to appeal closure of a complaint when they are not satisfied with the outcome of the investigation and/or the proposed resolution.

Raxio will designate a Complaints Appeals Panel (the Panel) comprised of senior managers or trusted external third parties, including technical specialists familiar with the issue. Generally, these people will not have had previous detailed knowledge of the complaint or engagement with the complainant.

In some cases, the Panel may choose to include one or more reputable and independent third parties on the Panel.

The Panel may decide to refuse an appeal if they feel the complaint has not been presented in good faith. The decision to refuse an appeal must be reviewed and signed off on by Raxio CEO.

In certain circumstances, Raxio may decide to appoint an individual mediator or Independent Appeals Panel that is neutral and wholly independent of Raxio. The decision to use such a wholly independent body will first be approved by Raxio CEO (see Rights Compatibility).

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The selection of the mediator or individuals comprising the Independent Appeals Panel will be conducted in consultation with the complainant and other key stakeholders to ensure there is trust in the process.

6. CONFIDENTIALITY AND ANONYMITY

The external grievance mechanism encourages external stakeholders to openly exchange views and concerns about operations with the Company. Confidentiality will be always observed to maintain confidence in the external grievance mechanism and ensure compliance with relevant laws. Complainants may wish to:

- Raise a concern in confidence:** Details will not be disclosed when a complainant asks Raxio to protect identity, and will remain secure with those Raxio staff investigating the complaint. However, the situation may arise where it will not be possible to resolve the complaint without revealing identity (for example, when evidence needs to be presented in court). In this case, Raxio will discuss with the complainant whether and how best to proceed.
- Raise a concern anonymously:** Complainants raising a concern anonymously need to provide sufficient facts and data to enable Raxio to investigate the matter without assistance. Raxio will make every effort to evaluate anonymous complaints; however, anonymity may make it more difficult to investigate, protect the position of the complainant, offer, and implement resolution, and give feedback.

Complaints or incidents, including discrimination or Gender Based Violence and Harassment (GBVH), will be investigated fairly, respectfully, and timely. Cases involving discrimination, harassment and/or GBVH will be treated by following the PIDG guidance documents.

7. RECORD KEEPING


For Raxio's own performance information in relation to grievances, we track the grievances that have been received. Depending on the number of cases, the grievances shall be treated statistically, and indicators must be defined. All records must be kept for auditing purposes. Where anonymity of the source of these grievances is paramount, even though the source is known, we ensure that this anonymity is safeguarded.

8. EQUITABILITY

Raxio encourages aggrieved parties to seek representation in the investigation process, whether internal or external. This is especially so when an aggrieved party is illiterate. To prevent any conflict of interest, Raxio can however not contribute to costs associated to this.

9. RIGHTS COMPATIBILITY

Depending on the country where a grievance originates, Raxio will follow the national rule of law and rely on national authorities where this can accommodate the aggrieved rights in the best way. However, when indications exist that the national rule of law and/or relying on national authorities will jeopardize the aggrieved rights (i.e. because of corruption, conflicts of interest, or cultural practices), Raxio will follow alternative ways based on the International Bill of Human Rights. In anyway, this will always happen on a case-by-case basis and, when not anonymous, in cooperation with the aggrieved.

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Apart from this, Raxio is willing to cooperate in any form of judicial or non-judicial approach to grievance resolution. This includes courts (both for criminal and civil actions, including appeal processes), labour tribunals, national human rights institutions, National Contact Points under the OECD Guidelines for MNE's, ombudsman offices, ILO-based mechanisms and the Compliance Advisor/Ombudsman (CAO) of the World Bank Group.

10. ANNEXES**Annex 1 - Form to be completed by Complainant**

Name:
Address:
Telephone:
E-mail:
Description of grievance: Who, what, where, when, how
Date and/or duration of incident that led to the grievance:
Suggestions for how the grievance could be resolved:
Signature:
Date:
How do you wish to be contacted? Telephone: <input type="checkbox"/> E-mail: <input type="checkbox"/>
Company Reference No. (for office use only):

Note: Please use additional pages if the fields are not sufficient.