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RACKSPACE TECHNOLOGY ENVIRONMENTAL POLICY AND INTRODUCTION

Our Approach to Environmental Sustainability

At Rackspace Technology, environmental responsibility is part of how we run our business — not a side initiative. As a global technology company, we know our operations and the solutions we deliver for customers both have an impact on the environment, and that a changing climate creates risks we need to plan for. We manage both sides of that equation deliberately, and we hold ourselves to independently recognized standards along the way.

Our approach centers on three commitments:

Reducing our climate impact. We're working to cut greenhouse gas emissions across our operations and transition to renewable energy, with targets independently validated by the Science Based Targets initiative (SBTi):

- Cut direct emissions and purchased-energy emissions by more than half by 2032
- Reach net-zero emissions across our full value chain by 2045
- Power our facilities with close to 100% renewable electricity by 2030

Building resilience to climate risk. We regularly assess how physical climate risks — extreme weather, resource availability, and shifting regulations — could affect our data centers, operations, and supply chain, and we plan accordingly.

Designing out waste. From how we build and cool our data centers to how we retire old servers, we look for ways to use fewer resources and keep hardware in use longer — through equipment lifecycle management, responsible e-waste recycling, and circular procurement practices with our suppliers.

How we hold ourselves accountable

Our environmental program is certified against ISO 14001, the international standard for environmental management systems. That means our commitments aren't just stated — they're backed by documented processes, regular internal audits, and independent third-party verification.

We report our progress each year in our ESG report, using globally recognized frameworks (GRI, SASB, CDP, and ESRS), and we disclose our climate-related governance in line with the Taskforce on Climate-related Financial Disclosures (TCFD). We also participate in industry alliances like SustainableIT.org to help push the broader technology sector forward.

Working with our customers

We help our customers reduce their own digital carbon footprint through cloud optimization and low-carbon transformation strategies — because our impact extends through the solutions we deliver, not just the facilities we run.

This page summarizes our full Environmental Policy (v2.0), which sets out our detailed commitments, governance structure, and management system in accordance with ISO 14001:2015. The complete policy is below

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Purpose

Rackspace Technology (**"Company"**) has established this Global Environmental Policy (**"GE Policy"**) to provide a comprehensive global strategy for environmental responsibility. This GE Policy establishes a framework for managing environmental impacts, meeting regulatory requirements, and driving continuous improvement in environmental performance.

Scope and Applicability

ISO 14001:2015 Clauses 4.3 and 5.2

This Environmental Policy applies globally to all Rackspace Technology activities, products, and services under the Company's operational control, and to all directors, officers, employees, contractors, consultants, suppliers, and other parties acting on behalf of the Company (**"Representatives"**).

Environmental Policy Statement

ISO 14001:2015 Clauses 4.1, 4.2, and 5.2

Rackspace Technology understands that its environmental performance is shaped by both the context in which it operates and the expectations of its stakeholders. The Company regularly identifies and reviews the internal and external issues — including regulatory, technological, competitive, and climate-related factors — that are relevant to its environmental purpose and that affect its ability to achieve the intended outcomes of its Environmental Management System. This includes consideration of both the Company's impact on the environment and the environment's impact on the Company, in alignment with double materiality principles.

Environmental responsibility is integral to the Company's operations, decision-making, and long-term value creation. The Company commits to establishing, implementing, maintaining, and continually improving an Environmental Management System (EMS) aligned with ISO 14001 to systematically manage environmental risks, impacts, and opportunities across its global operations.

Our environmental strategy focuses on:

- **Climate Change Mitigation & Energy Management:** Reducing greenhouse gas emissions and transitioning to renewable energy
- **Climate Change Adaptation:** Building resilience against physical climate risks
- **Circular Economy & Resource Efficiency:** Maximizing resource productivity and minimizing waste

This statement supplements our Global Occupational Health, Safety, and Environment Sustainability Statement.

Environmental Management System

ISO 14001:2015 Clause 4.4

Rackspace Technology maintains a certified Environmental Management System (EMS) conforming to **ISO 14001**. The EMS defines the scope of our environmental management activities, establishes processes for identifying and evaluating environmental aspects and impacts, and provides the operational framework through which all commitments in this policy are implemented, monitored, and improved.

The EMS encompasses:

- Identification of environmental aspects and evaluation of their significance across global operations
- Determination of applicable legal and other compliance obligations
- Assessment and management of environmental risks and opportunities

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- Establishment and pursuit of environmental objectives and targets
- Operational controls and procedures for significant environmental aspects
- Emergency preparedness and response processes
- Internal audit, management review, and continual improvement cycles

This EMS is maintained by the Environmental Management System Team, reviewed annually through formal management review, and subject to periodic third-party surveillance and recertification audits.

Compliance Obligations

ISO 14001:2015 Clauses 6.1.3 and 9.1.2

The Company commits to:

- Complying with all applicable environmental laws, regulations, permits, and other binding obligations in the jurisdictions in which it operates
- Meeting applicable customer, contractual, and voluntary environmental commitments, including recognized international standards and frameworks
- Periodically evaluating compliance and addressing any identified nonconformities in a timely manner

Environmental Protection and Prevention of Pollution

ISO 14001:2015 Clause 5.2(b)

The Company commits to environmental protection appropriate to the nature and scale of its activities, including:

- Protecting the environment through the prevention of pollution, responsible management of energy, water, and natural resources, minimization of waste including electronic waste (e-waste), and control of emissions to air and environmental impacts such as noise
- Reducing greenhouse gas emissions across Scopes 1, 2, and material Scope 3 categories
- Improving energy efficiency and increasing the use of renewable electricity in facilities, data centers, and cloud operations where feasible
- Conserving natural resources, including water, in line with their materiality to our operation
- Water usage at Rackspace-operated data centers is limited to standard office consumption, as these sites do not require water for active cooling; water has been confirmed as non-material per Rackspace's Double Materiality Assessment (DMA).
- Maintaining compliance with all applicable local air and noise quality regulations across global operations, with zero regulatory violations. Employees working in designated noise areas are provided with appropriate hearing protection PPE (e.g., earmuffs or earplugs) in accordance with applicable local regulatory requirements. As per Rackspace's Double Materiality Assessment (DMA), Air and Noise have been confirmed as not Material.
- Applying circular economy principles, including waste prevention, reuse, recycling, and responsible disposal, with a focus on IT asset lifecycle management and e-waste.
- As an IT services company, Rackspace does not directly handle chemicals or hazardous materials in its operations; this has been confirmed as non-material per Rackspace's Double Materiality Assessment (DMA). Per Rackspace's Partner Code of Conduct, partners must safely manage, handle, and dispose of hazardous materials, with personnel trained accordingly.
- Avoiding or minimizing biodiversity and ecosystem impacts within operational and sourcing activities; this has been confirmed as non-material per Rackspace's Double Materiality Assessment (DMA), given the nature of Rackspace's operations as an IT services company.
- Designing and procuring IT equipment with durability, repairability, and material recovery in mind

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Environmental Aspects, Risks, and Opportunities

ISO 14001:2015 Clauses 6.1.1, 6.1.2, and 6.1.4

The Company determines the risks and opportunities that need to be addressed to give assurance that the EMS can achieve its intended outcomes, prevent or reduce undesired effects, and achieve continual improvement. This includes risks arising from environmental aspects, compliance obligations, and the issues identified in the context of the organization. Identified risks and opportunities, and the actions planned to address them, are integrated into the Company's enterprise risk management (ERM) framework and reviewed as part of the annual management review cycle.

The Company establishes, implements, and maintains a process to identify the environmental aspects of its activities, products, and services — including those it can influence within its supply chain — and to determine those that have or can have a significant environmental impact. This assessment considers:

- Normal, abnormal, and emergency operating conditions
- Climate-related physical and transition risks affecting operations and the supply chain
- A lifecycle perspective on products and services where relevant
- Opportunities to improve environmental performance through innovation, efficiency, and technology

Significant environmental aspects are documented and taken into account when establishing environmental objectives and determining operational controls. This register of aspects is reviewed when changes to operations, products, or services occur, and at least annually as part of the management review.

Objectives, Targets, and Planning

ISO 14001:2015 Clauses 6.2.1 and 6.2.2

The Company establishes measurable environmental objectives and targets, consistent with this policy and its significant environmental aspects, including:

- **Net-zero greenhouse gas emissions by 2045**, validated by the Science Based Targets initiative (SBTi):
  - Near-term: Reduce absolute Scope 1 and 2 GHG emissions by 50.4% by FY2032 from an FY2023 baseline
  - Near-term: Reduce absolute Scope 3 emissions from purchased goods and services by 30% by FY2032
  - Long-term: Reduce absolute Scope 1, 2, and 3 GHG emissions by 90% by FY2045
- **Renewable electricity:** Increase use in owned and leased facilities to as close to 100% as feasible by 2030
- **IT hardware diversion:** Diverting IT hardware from landfill through refurbishment, recycling, and responsible reuse. All e-waste is handled by authorized and certified vendors, with approximately 99% recycled or reused. No e-waste is sent to landfill, and disposal certificates are retained for 100% of disposed assets. General office waste is managed in accordance with local regulatory requirements in each jurisdiction where Rackspace operates.
- **Circular procurement:** Implement circular procurement practices in collaboration with suppliers and OEMs

Action plans define responsibilities, resources, timelines, and performance indicators. Progress is reviewed annually and reported to leadership and stakeholders and is integrated into operational performance metrics where applicable. The Company assesses annually the possibility of accelerating the Net Zero timeline from 2045 to an earlier date.

Roles, Responsibilities, and Authority

ISO 14001:2015 Clause 5.3

Environmental responsibilities are assigned as follows:

- **Board of Directors:** Oversees environmental strategy and performance

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- **Executive Leadership Team:** Determines and provides the human, technological, and financial resources required for the establishment, implementation, maintenance, and continual improvement of the EMS, and ensures environmental management is integrated into business planning and operational decision-making
- **Vice President of Sustainability:** Leads the implementation and effectiveness of the EMS
- **Environmental Management Team:** Performs daily management of environmental programs, operational controls, monitoring, and reporting
- **Environmental Management System Team:** Maintains ISO 14001 conformance and manages the annual audit and surveillance cycle
- **All Employees:** Support and adhere to environmental policies and procedures, comply with EMS requirements, and participate in training
- **Suppliers and Business Partners:** Adhere to environmental requirements and the Supplier Code of Conduct

Competence, Awareness, and Communication

ISO 14001:2015 Clauses 7.2, 7.3, and 7.4

The Company determines the competence required for persons performing work under its control that affects environmental performance, ensures those persons are competent on the basis of appropriate education, training, or experience, and takes action to acquire the necessary competence where gaps are identified. Records of competence are retained as documented information.

All employees and contractors are made aware of:

- The Environmental Policy and their role in supporting it
- The significant environmental aspects and related actual or potential impacts associated with their work
- The environmental benefits of improved personal performance
- The implications of not conforming with EMS requirements, including failing to fulfil the Company's compliance obligations

The Company establishes, implements, and maintains processes for both internal and external communications relevant to the EMS, determining: what will be communicated; when it will be communicated; with whom — including employees, contractors, customers, regulators, investors, and the public; and how communication will occur. All external environmental communications are consistent with the information generated by the EMS, are accurate, and do not make unsubstantiated environmental claims.

Operational Control and Lifecycle Perspective

ISO 14001:2015 Clauses 8.1 and 8.2

The Company establishes operational controls to manage significant environmental aspects, including:

- Data center efficiency programs (cooling optimization, smart metering, equipment lifecycle extension)
- Energy procurement strategies such as green tariffs and virtual power purchase agreements (VPPAs)
- IT Asset Disposition (ITAD) procedures for secure and responsible decommissioning and recycling of servers, storage, and network gear
- Environmental considerations embedded in procurement and supplier selection
- Regular environmental impact assessments of our operations

A lifecycle perspective is applied to products and services where feasible.

The Company establishes, implements, and maintains processes to prepare for and respond to potential environmental emergency situations, including fuel or chemical spills, fire, flooding, and hazardous material releases. Response procedures are documented, tested through periodic drills, communicated to relevant personnel, and reviewed and updated following any actual incident or significant change in operations. Where practicable, the Company tests its response procedures and communicates relevant information to contractors and visitors who may be affected.

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Monitoring, Measurement, and Performance Evaluation

ISO 14001:2015 Clauses 4.2, 7.4, and 9.1

The Company identifies its relevant interested parties — including investors, customers, employees, regulators, suppliers, and communities affected by its operations — and determines their environmental requirements and expectations. These inform the Company's environmental objectives, reporting content, and disclosure approach.

The Company monitors and measures environmental performance through:

- Tracking GHG emissions (Scopes 1, 2, and material Scope 3) in accordance with the GHG Protocol, and ensuring external verification of results
- Implementing monitoring and measurement processes for energy, greenhouse gas emissions, water usage, waste, and e-waste, and where applicable air emissions and noise
- Tracking and disclosing non-hazardous waste volumes, reported annually in the ESG report
- Measuring progress against objectives and targets using defined KPIs
- Conducting internal EMS audits and management reviews at planned intervals

Environmental performance is disclosed in the Company's annual ESG report, prepared in accordance with GRI, SASB, ESRS, and CDP frameworks. Climate-related governance and risks are reported in alignment with the Taskforce on Climate-related Financial Disclosures (TCFD).

Management Review and Continual Improvement

ISO 14001:2015 Clauses 9.3, 10.2, and 10.3

Top management reviews the EMS at least annually to assess its continuing suitability, adequacy, and effectiveness. The Company commits to continual improvement through:

- Integrating environmental management into business planning and decision-making processes
- Annual EMS audits to track progress and identify gaps
- Evaluating opportunities to accelerate progress toward net-zero, including assessing annually the possibility of bringing the 2045 target forward
- Collaboration with customers on low-carbon digital transformation solutions and cloud optimization strategies
- Investing in AI-driven automation, virtualization, and server consolidation to reduce resource use
- Participating in industry alliances such as SustainableIT.org

When a nonconformity occurs — including those arising from complaints, audit findings, incidents, or compliance failures — the Company reacts promptly to control and correct it, evaluates whether similar nonconformities exist or could occur elsewhere, investigates root causes, and implements corrective actions proportionate to the significance of the effect. The effectiveness of corrective actions is reviewed, and results are retained as documented information and reported through the management review process.

Enforcement

Environmental management responsibilities are distributed across three key teams to ensure effective implementation of this Global Environmental Policy:

- **Technology and Sustainability Team:** Develops environmental strategy, sets targets, manages compliance and reporting, and provides overall policy coordination and guidance
- **Procurement Team:** Integrates environmental criteria into supplier selection, drives supplier engagement and Scope 3 emissions reductions, and monitors supply chain environmental performance
- **Operations Team:** Implements environmental best practices at facilities, manages site-level performance (energy, water, waste), and ensures operational compliance and data collection

These teams collaborate through regular coordination meetings to achieve the Company's environmental objectives, with the Technology and Sustainability Team providing overall leadership and maintaining communication across all functions.

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Policy Review and Availability

ISO 14001:2015 Clause 5.2

This Environmental Policy is reviewed at least annually or when significant changes to the Company's operations, business context, stakeholder expectations, or regulatory requirements occur. Revisions, waivers, or exceptions must be approved by the Technology and Sustainability Team. This policy is documented, maintained, communicated within the organization, and made available to relevant interested parties.

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Policy Approval

Ben Blanquera

Ben Blanquera
VP AI and Sustainability, Rackspace Technology
Date: 11 August 2026

Change and Review Record

Version	Date	Review and Revision Comments
1.0	10 Jul 2025	Approved Version — Srini Koushik
2.0	11 Aug 2026	Updated to reflect full ISO 14001 clause coverage and added introduction

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