VIRTUS COMPLIANCE POLICY

VIRTUS Data Centres challenges the traditional data centre landscape in London with some fresh thinking. We go beyond traditional boundaries of data centre services. With every client we aim to become a valued, trusted and flexible partner in delivering their IT strategy.

We offer solutions for Enterprise IT as well as IT Services Providers, MSPs or Cloud providers. Every component is flexible, from the energy metering to dedicated or shared hall and plant, to self-service portal-based monitoring or fully managed services. Contracts can range from a day to a decade, and we offer the first Colocation-on-Demand and Connectivity-on-Demand services to the London market.

Above all, the breadth, depth, quality, flexibility and customer service of VIRTUS solutions delivers reduced Total Cost of Ownership of data centre and connectivity services when compared to alternatives. When combined with the convenience of our London locations – this is why VIRTUS data centres are becoming the preferred locations of growing business communities in London for IT, Cloud and Managed Services Providers, and Enterprise IT users in Finance, Media and Education.

PRIDE

DEDICATED

CARING HELPFUL

RELIABLE

VIRTUS' values underpin:

- Delivery of high-quality services designed to meet or exceed our customer's expectations;
- Our position as a leader at the forefront of the data centre industry, understanding the markets in which we operate, our future requirements and our customer's current and future requirements
- The on-going development of our people to enable delivery of high-quality outcomes
- Continual measurement, review and improvement of our policies, processes and service levels
- Protection of services and to the confidentiality, integrity and availability of the information we are supplied

VIRTUS is committed to operating in adherence to all applicable regulatory requirements, to meet or exceed customer requirements and continually improve the effectiveness of our management systems in line with the conditions of BS EN ISO9001:2015, BS EN ISO14001:2015, BS ISO45001, BS EN ISO50001:2018, ISO/IEC 27001:2022, SSAE16/ISAE3402 Service Organisation Controls (SOC 2) Reporting, Information Technology Infrastructure Library (ITIL) Guidelines, BS ISO/IEC20000-1:2011 and BS EN ISO 22301:2019.

Senior Management Commitment:

Commitment to the delivery of quality, continual services, energy & environmental performance, health and safety and information security principles extends to senior levels of VIRTUS and will be demonstrated through this Compliance Policy. Senior Management shall guarantee the following:

1. The provision of appropriate resources to provide and develop/improve services, whether that is commercial, personnel, time or leadership resources
2. To ensure a systematic review of performance is conducted on a regular basis to ensure that service delivery, business continuity plans, energy & environmental and information security objectives are being met
3. To ensure that this policy and all contiguous controls are compatible with the strategic direction of the business and are integrated into the business processes.
4. Maintain a health and safety management system relevant to activities and processes covering all sites that:
    a. Protects workers from reprisals when reporting hazards, risks and opportunities
    b. Includes processes for consultation and participation of workers
    c. Supports the functioning of health & safety committees.
5. To ensure that service delivery, energy & environmental and information security issues are identified, registered and treated as appropriate in a documented process
6. That a management review is conducted at least once annually and that business decisions are decided upon verifiable evidence
7. Utilise a risk-based approach for business decisions and determining operational controls
8. The appointment of competent and qualified responsibilities to manage processes & systems and to provide direction & support to persons (including managerial roles) contributing to the effectiveness of this policy and all contiguous controls in order to demonstrate leadership and commitment
9. To communicate the importance of effective policy & controls to preserve a culture of focussed improvement

With regards to providing quality, continual service, VIRTUS aims to:

- Achieve 100% compliance with customer service agreements
- All operational data centre space is appropriately and effectively managed
- Certify best practice security standards (physical, logical and personnel) are met by working closely with customers, key partners and suppliers and seeks ways in which we can continually improve our security to mitigate new vulnerabilities
- Ensure customers have confidence in our information security, and are safe in the knowledge that we are responsive to their security concerns
- Ensure customers have confidence in our business continuity arrangements to provide 99.9998% uptime of agreed service
- Meet or exceed every customer's requirements
- Gain and, where possible, act on feedback from our customers to enhance customer satisfaction
- Maintain and periodically test the suitability of emergency procedures and business continuity plans with a view to successfully dealing with service impacting incidences
- Ensure that processes and management systems are determined, documented and maintained to reflect our activities, compliance to applicable regulation and customer requirements, including the reporting of performance to senior management
- Establish and sustain high quality service reporting and notifications that is accurate
- Ensure service requests are handled competently and in a timely manner
- Strictly control the design, application and communication of changes within the data centre facilities
- Acknowledge, act on, resolve and communicate incidents in the most effective and practicable manner including the use of problem management for permanent close out and trending
- Ensure new data centres are indeed ready for service by undertaking controlled testing and commissioning and accurate handover to the Operations Department
- Ensure customer handovers are fulfilled and deemed effective within the specified time periods
- Provide an industry leading customer experience from pre-sales through to continuing service
- Understand and plan for the future needs of our customers
- Where possible, involve the latest, proven, best available technologies and techniques

With regards to relationships and partnerships, VIRTUS aims to:

- Build mutually beneficial relationships with our key partners to ensure that all outsourced activities within the company are effectively managed

- Where necessary, work with our key partners to improve services

- Ensure exceptional personnel competencies and personnel screening is achieved

- Request the use of mutually beneficial systems to promote collaborative working

- Regularly evaluate and monitor key partners using key performance indicators

- Communicate all necessary VIRTUS policies, processes and controls to key partners with receipt of understanding

With regards to business as usual, VIRTUS aims to:

- Utilise a risk-based approach to identify shortfalls or opportunities to improve to further drive improvements within the company
- Determine requirements for monitoring and measuring performances, in order to make decisions based on facts and data
- Implement and maintain precise monitoring systems including (but not limited to) Building Management Systems, Power Management Systems and Information Management Systems
- Ensure relevant monitoring equipment is calibrated guaranteeing precise information
- Minimise (and prevent where possible) pollution arising from our activities & services and the activities of key partners through:
  - Improving environmental & energy performance by installing/implementing and maintaining efficient & effective infrastructure, policies, procedures and controls
  - Procuring 100% renewable energy sourced from sustainable grid power year on year for use within our data centres
  - Managing the storage of hazardous substances at our data centres, in particular diesel storage
  - Managing the safe collection of hazardous wastes from our data centres in accordance with waste hierarchies and compliant record management
  - Reducing the environmental impact of our office-based activities
  - Promote minimisation, reuse and recycling of wastes and to ensure diligent duty of care
  - Efficiently and accurately monitor and record diesel consumption for statutory reporting as to utilise FAME-free diesel wherever possible
- Compliant communication to government and industry bodies relating to permit, licences and company reporting requirements
- Operate efficient, safe and well-maintained data centres by:
  - Considering and addressing the environmental impacts of our activities and the activities of our key partners when planning and building new facilities and data centres in line with business requirements
  - Purchasing efficient products and services, and design for energy performance improvements
  - Ensuring robust maintenance regimes are in place for maintaining suitable equipment and infrastructure to like-new conditions
  - Using the best possible subcontractors (preferably manufacturers) to maintain equipment and infrastructure
  - Diligently and, in a timely manner, act on statutory inspections report findings
- Audit and evaluate operational policies, processes, staff and controls through an audit schedule and communicating findings to senior management.

With regards to the people we influence, VIRTUS aims to:

- Identify competency requirements for our staff and provide adequate training, instruction, information and supervision to staff and others affected by our activities
- Provide internal, serviced communications systems that are appropriate for ongoing operations
- Adequately communicate and promote our Policies, processes and controls to all relevant parties
- Provide a suitable mechanism for feedback enabling staff to express shortcomings, opportunities to improve, non-conformances and additional controls.

Through the above aims, VIRTUS will determine and achieve business-driven objectives and continually improve our Service Delivery, Quality, Energy & Environmental, Health & Safety and Information Security performance.

Interested and Affected Parties:

There are a number of stakeholders and interested parties associated with the services offered. Feedback from these parties will be sought where possible to ensure compliance is met and remains appropriate & effective to VIRTUS' business needs.

Interested Party	Stake/Interest	Potential Feedback/Input
Internal Users / Staff	• Compliance with policies and procedures • Disciplinary action related to non-conformance • Protection of their personal data (HR) • Implications to regulations • Professional development, training and awareness • Involvement in policy, process and control development • Decisive decision making • Provision of the tools, knowledge and training required to assume their responsibilities • Clear and accurate job descriptions, responsibilities and accountabilities • Safe working conditions and processes (including risks arising from epidemics and pandemics)	• Staff training/forum feedback • Exceptions to policies and procedures • Reporting of incidents, events and weaknesses • Awareness communications • Internal and external audit findings
Customers	• Security and achievement of contracted services • Confidence in our operational and business continuity processes • 100% uptime of data centre power • Responsive, accurate communications from VIRTUS • Strategic and future planning • Certification and/or conformance to industry-best standards and practices • Compliance to applicable regulation • Safe working conditions (including risks arising from epidemics and pandemics) • Competitive service pricing • Protection of personal data	• Security requirements within contracts • Customer feedback/complaints • Incident management • 24-hour service management centre
Suppliers / Partners	• Service provision critical to our businesses • Holistic compliance to applicable regulation	• Reported incidents • Service agreements • Service review meetings and reporting • Key performance indicators
The Board / Senior Management	• Compliance with regulation, legislation and contractual/SLA obligations • Competitive advantage • Effective power & capacity management • Top-down decision making, policy development and business controls • Accountable party • 100% uptime of data centre power • Planned, tried and tested business continuity management • Reduction of the likelihood of major accidents and injuries – Preservation of duty of care • Risk-based information to drive business decisions	• Applicable legislation/ changes to legislation • Planned business changes impacting service delivery • Incident management
Investors	• Compliant management of the business • Business growth and expected returns • Risk-based information to drive business decisions	• Investor meetings • Board meetings
Regulators (Customers) (EA) (Local Council) (HSE)	• Compliance with regulation, legislation and contractual obligations • Mandatory adherence to permits and licences • Provide on time and transparent information when reporting • Provide resources to auditing • Access to relevant information/data • Reduction of the likelihood of major accidents and injuries	• Applicable legislation/ changes to legislation/ Code of practice • Site visitations • Notification

Government	• Compliant reporting • Access to relevant information/data • Provide resources for investigatory powers • Reduction of the likelihood of major accidents and injuries	• Notifications • Requests for information
Neighbours / Community	• Activities that could be considered a Nuisance (noise/smoke)	• Neighbour/Community feedback/ complaints • Notifications from local councils
Landlord	• Compliance with contractual obligations	• Planned contractual changes impacting upon compliance requirements
Certification bodies	• Compliance with contractual obligations • Compliance with standard requirements	• Planned contractual changes impacting upon compliance requirements • Changes to Standard(s) impacting upon compliance requirements

Scope:

For the purposes of certification within VIRTUS Data Centres, the boundaries of this policy and the scope of certification is:

BS EN ISO 9001:2015	The design, build and ongoing operation of mission critical Tier III data centre facilities.
BS EN ISO 14001:2015	The design, build and ongoing operation of mission critical Tier III data centre facilities.
BS EN ISO 50001:2018	The Management of energy relating to the design, build and ongoing operation of mission critical Tier III London Data Centres as follows; LONDON1, LONDON2, LONDON3/4, LONDON5, LONDON6, LONDON7, LONDON8 LONDON9, LONDON10, LONDON11 and Head Office, London in accordance with the EnMS and applicable energy legislation.
ISO/IEC 27001:2022	Information security management for the design, build and ongoing operations of mission critical Tier III data centre facilities. In accordance with the statement of applicability issue 3.
ISO/IEC 20000-1:2012	The Service management system of VIRTUS Holdco Limited (trading as VIRTUS Data Centres) supporting the provision of the build and ongoing operation of data centre facilities consisting of retail and wholesale colocation, supporting cloud and high-density computing models to customers from LONDON1 – Enfield, LONDON2 – Hayes, LONDON4 – Slough, LONDON5 – Stockley Park in accordance with Service Catalogue.
BS EN ISO 22301:2019	The business continuity management system relating to the ongoing operation of mission critical, Tier III London data centre facilities in conformance with the Compliance Policy and business continuity plans.
BS ISO 45001:2018	The occupational health & safety management system relating to the ongoing operation of mission critical, Tier III London data centre facilities in accordance with applicable legislation and the occupational health & safety policy.

These activities are carried out from:

Site Name	Location Type
Balderton street	Head Office
LONDON1 (Enfield)	Data Centre
LONDON2 (Hayes)	Data Centre
LONDON4/3 (Slough)	Data Centre
LONDON5 (Stockley Park)	Data Centre
LONDON6 (Stockley Park)	Data Centre
LONDON7 (Stockley Park)	Data Centre
LONDON8 (Stockley Park)	Data Centre
LONDON9 (Stockley Park)	Data Centre
LONDON10 (Slough)	Data Centre
LONDON11(Slough)	Data Centre

This policy applies to all individuals working at all levels, including Senior Management, Officers, Directors, Employees (whether permanent, fixed term or temporary), Trainees, Interns, Agents, Sponsors, or any other person associated with VIRTUS (involved third parties). This policy should be communicated to key Consultants, Contractors, Suppliers, Business Partners and other similar involved third parties engaged by VIRTUS and a commitment obtained from them that they will both comply with it themselves and require any sub-contractors to comply with an equivalent policy.

Responsibilities:

All Employees are responsible for building service delivery, service management, quality, energy & environmental and information security considerations into their day to day activities at VIRTUS. The company is responsible for maintaining management systems, communicating the requirements and policing adherence to its protocols. This is achieved through designating specific roles and responsibilities in related manuals, such as the VIRTUS Operations Manual. The Directors of the company are ultimately responsible for legal implications.

Roles, responsibilities and accountabilities are further detailed to individual and process level to include, where necessary, specific roles directly pertaining to service delivery, service management, quality, energy & environmental and information security management.

Directors and Managers shall ensure that any third-party contractors are adequately qualified, are aware of our policies and processes, the need to deliver agreed services and conducting appointed activities legally, ethically and in accordance with agreements.

Each Employee has a duty to comply with our policies & processes, in order to determine and where possible, exceed customer expectations, and to work in a manner (within their areas of responsibility):

- To prevent pollution and promote energy & environmental considerations
- That reduces the risk of breaches of information
- That promotes continual service delivery and customer satisfaction, including business continuity planning
- To continually improve processes and drive continual improvement throughout the company
- That has the company's best interests in mind.

This Policy will be available at all sites and offices and to the general public via the VIRTUS website. This Policy will be reviewed & approved on an annual basis by Senior Management team or sooner if required.

VIRTUS Data Centres ensures that internal and external issues relevant to the provision of services, energy & environmental, information security, our strategic direction and to maintaining compliance are captured, evaluated and mitigated through a Risk Management System compliant with the requirements of BS ISO31000:2009 Risk Management.