

Sustainability Proofing Summary ¹	
Verda Cloud Oy	
EIA Directive	☐ Annex I projects (EIA required) ☐ Annex II projects (screening) ☐ EIA required (project screened in) ☐ EIA not required (project screened out) 2014 EIA Directive applicable ☐ Yes ☒ No
Climate Assessment	
	The project involves the financing of high-density GPU server racks installed in third-party colocation halls in Finland. No EIA is required and Finnish national legislation applicable to the construction is complied with. As a tenant, Verda relies on its colocation hosts for the building envelope, grid connection, cooling plant and back-up power, and for the structural climate adaptation of the host buildings. Based on NIB's in-house vulnerability analysis, no medium or high climate adaptation risks have been identified and no further climate adaptation measures are required. A carbon-footprint assessment is not required given the nature of the activity. Finland's low-carbon grid (hydro, nuclear and wind) and cool climate are well suited to free cooling, and Verda sources 100% renewable energy for its data-centre operations, which supports EU climate-neutrality objectives for data-processing activities.
Environmental Assessment	
	The project involves the installation of GPU hardware in existing, leased colocation halls. No greenfield construction is undertaken and the project is not listed under Annex I or Annex II of the EIA Directive as a stand-alone operation; no EIA or environmental permit is therefore required. Finnish national legislation applicable to the installation is complied with. The project's environmental impacts are minor. Direct process emissions are none and indirect emissions from grid electricity are addressed under the climate dimension. Cooling-water intensity depends on the technology used at each host site but remains well below water-stress thresholds. The project causes no new land take, soil disturbance or land-use change, and no construction or decommissioning works take place at Natura 2000 sites.

¹ In line with Article 8 (5) of the InvestEU Regulation and the sustainability proofing guidance ([C\(201\)2632 final](#)).

	Noise and odour impacts are not material. Overall, environmental risks are assessed as low and no further mitigation measures are required.
Social Assessment	
	Verda is a Finland-based technology company employing around 100 highly skilled staff, primarily at its Helsinki headquarters. As a digital infrastructure provider operating GPU data-centre capacity through established colocation facilities, its activities involve no construction or heavy physical labour. All Verda employees are subject to Finnish labour and occupational health and safety laws, which ensure fair working conditions, non-discrimination and safe workplaces in line with Finnish and EU standards. The project involves no on-site civil works, and the risk of worker injuries or public safety hazards is accordingly low. Verda has adopted an internal Code of Conduct and maintains an Exclusion List, embedded in its user terms and conditions, that prohibits unethical or illegal activities on its platforms, including crypto-mining. No adverse impacts on local communities or vulnerable groups, no gender-specific risks, no land acquisition or involuntary resettlement, and no impacts on cultural heritage have been identified; the project's limited physical footprint makes dedicated public consultations unnecessary. As a fast-growing SME, Verda's formal stakeholder engagement and ESG governance are still developing and are expected to be formalised as the company grows.