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*Bureau Veritas*
*Denmark*

*Climate Neutral Data Center Pact*

# CNDCP Auditing Framework & Regulation Compliance Mapping

**Cerification and Monitoring Bodies may request the additional documents under Tabs 2 to 4, below, from the Secretariat of the CNDCP : cndcp-info@cispe.cloud**

**Tab 1:** Audit Framework, Compliance Guide

**Tab 2:** Audit Framework, Compliance to CNDCP SRI (1 to 5)

**Tab 3:** Audit Framework, Compliance to the Taxonomy Regulation (6 to 10)

**Tab 4:** Framework, Standards summary

**Guidance notes:**

1. Each line item contains a reference to the relevant sections of the Taxonomy Regulation 2020/852, the JRC Code of Conduct for Data Center Efficiency, the applicable Standards and Key Performance Indicators (KPIs).

2. Data Center Owner and/or Operators will outline their own Data Center footprint and how each facility within that footprint meets the requirements as part of their own certification

3. The Data Centre Owner and/or Operator is the entity that manages or owns the facility for the purposes of meeting the requirements for Energy Efficiency, Water Conservation, Circular Economy and Circular Energy Systems.

4. Responsibility for Clean Energy will be met by the entity that pays for the electric energy supply, unless a customer of that facility accounts for all or a portion of that electricity as part of their own publicly declared clean energy goal.

5. Responsibility for the Circular Economy will be met by the owner of the eligible equipment.

6. In the case of Colocation type facilities (Shared responsibilities) Owner/Operators (Hosts) whom require to have their economic activities classified as environmentally sustainable in order to receive "Green Funding" for their activities, they would need to prove compliance in collaboration with the facility IT Equipment users (Tenants). This would work in reverse in cases where the tenant wants to receive the green funding.

7. The Taxonomy Regulation according to which a Data Centre is either "Compliant" or "Non-compliant", wherein the technical screening criterion from the delegated act states "The activity has implemented all relevant practices listed as 'expected practices' in the most recent version of the European Code of Conduct on Data Centre Energy Efficiency, or in CEN-CENELEC document CLC TR50600-99-1 'Data centre facilities and infrastructures - Part 99-1: Recommended practices for energy management', however, the technical screening criteria also states that "Alternative best practices from the European Code of Conduct on Data Centre Energy Efficiency or other equivalent sources may be identified as direct replacements if they result in similar energy savings

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**Applicability of the Code of Conduct Expected Practices: It is understood that not all operators will be able to implement all of the expected Practices in their facilities due to physical, logistical, planning or other constraints. In these instances an explanation of why the expected action is not applicable or practical should be provided in the "Reason why this Practice cannot be implemented in this data centre" column in the reporting form, alternative best practices from the Code of Conduct or other sources may be identified as direct replacements if they result in similar energy savings**

8. **The Taxonomy Regulation requires compliance of the entire Data Center in line with the technical screening criteria laid out in the delegated act, which requires collaboration between the Host and its Tenants for the purpose of achieving compliance.**

9. **The Taxonomy Regulation states that implementation of the latest edition of the JRC Code of Conduct for Data Center Efficiency 2021 Best Practices Guidelines and/or equivalent (Standards based) compliance shall be verified by an independent third-party and audited at least every three years**

| Colour Code: | | Framework Colour Coding key |
|---|---|---|
| | 🟩 | **CNDCP - Climate Neutral Data Center Pact SRI Policy, Statements and Targets** |
| | 🟦 | **EU Taxonomy Regulation EU 2020/852,** |
| | 🟦 | **CoC - Code of Conduct for Data Center Energy Efficiency** |
| | 🟨 | **EED - Energy Efficiency Directive (Fit for 55), based on CEN/CENELEC EN 50600** |
| | 🟧 | **CSRD - Corporate Sustainable Reporting Directive and ESRD - European Sustainability Reporting Standards** |

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