

# Making a Positive Impact

Social, environmental and economic impact of euNetworks

June 2022





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# A note from our CEO

We believe that bandwidth changes everything, connecting everybody to everything making *anything* possible.

euNetworks is a provider of critical bandwidth infrastructure, owning and operating 17 fibre based metropolitan networks connected with a high capacity intercity backbone covering 53 cities in 17 countries across Europe. We continue to develop our networks in support of our customers and we are committed to serving Europe's future bandwidth needs. In doing this, we are also focused on making a positive impact on society and our world.

Over the course of the last two years, as a team we have focused on ensuring sustainability is at the heart of our operating principles and values. We are committed to being net-zero carbon by 2040 and have set 1.5°C-aligned science-based targets across Scopes 1, 2 and 3. We have made good progress towards this commitment, understanding where we are today and how we will get there. We have signed up to The Climate Pledge. We're increasing the use of renewables wherever we can. We've developed an innovative Network Construction Carbon Tool to calculate and manage project-level emissions and we're constantly working with suppliers on materials, construction methods, routes and technologies to drive down emissions and deliver the lowest carbon footprint per bit. euNetworks has long-term sustainability-linked infrastructure financing. This further aligns euNetworks' ESG and financial frameworks in the operating and development of our business.

Our people are at the heart of how we develop as a company and our societal impact. Our company values drive our behaviour and form the basis of how we operate our business, work as a team and as individuals. We respect and trust one another and all of our stakeholders. We embrace diversity and inclusion in all that we do and building a diverse and inclusive culture is a priority at euNetworks. We are committed to achieving a gender balance in our business and becoming a women's choice employer within telecoms.



I am proud of what we have achieved and I look forward to driving our sustainability goals further in the years ahead. We still have much to do and we are committed to supporting our customers, partners, communities and society while delivering bandwidth services. This report presents some of our successes and areas of focus, and our ambitions as we move forward.

Brady Rafuse,  
Chief Executive Officer

# About euNetworks

euNetworks is a provider of bandwidth infrastructure services in Western Europe. We own and operate a unique inventory of duct and dense fibre networks that connect data centres. We are headquartered in London with offices across Europe to support our customers locally.

## Our Network\*



**\*NOTE:**

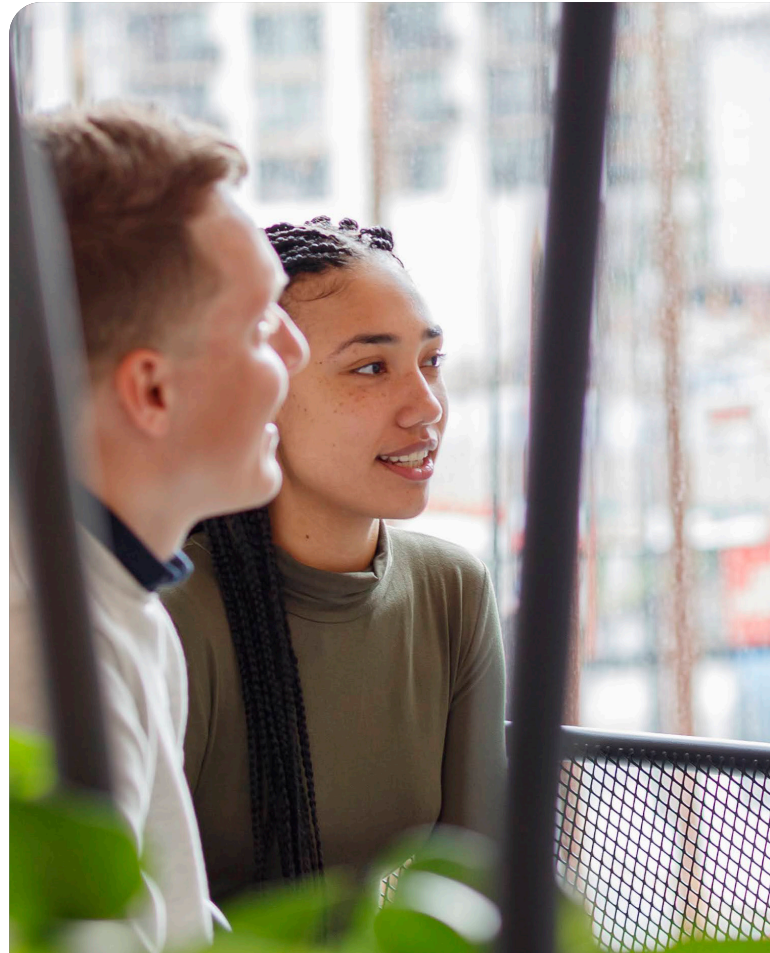
As at 31st March 2022, we continue to add route kilometres to our metro and intercity networks, connecting more data centres, key sites and buildings with fibre for our customers.



## Our Products

We sell focused products based on Fibre, Wavelengths and Ethernet.

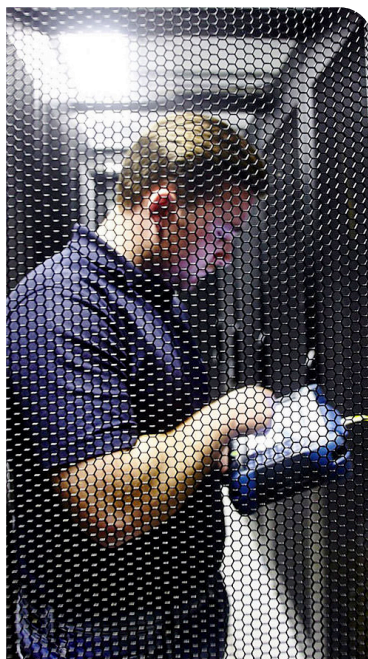
<b>Ethernet</b>	Enabling the transport of information between customer locations or data centres, point to point, point to multi point and any to any.
<b>Metro Wavelengths</b>	Dedicated and customised bandwidth, enabling reliable high data-rate delivery in European cities.
<b>Long Haul Wavelengths</b>	Dedicated bandwidth enabling high-speed application delivery across Europe.
<b>Dark Fibre</b>	We own and operate duct and fibre based networks in cities and between cities.
<b>Colocation</b>	Flexible and scalable Tier 2 and Tier 3 colocation space in Germany and the Netherlands.
<b>Internet</b>	Offering basic and managed Internet connections, enabling wider virtual private networks.



## Our Values

The team has committed to these values. They drive our behaviour and form the basis of how we operate our business.

- We are here for our customers. We understand that they put their trust in us and we never forget it.
- We respect and trust one another and all of our stakeholders.
- We embrace diversity and inclusion in all that we do.
- We demonstrate integrity in everything we do.
- We are here to make a positive impact on society and our world.
- We are in the game, not just at the game. As one team.



# Our Progress: Highlights

	Planet	People	Prosperity	Partnership
2010		Company branding, messaging, story and values	Implemented key employee policies, including: Anti-Harassment & Bullying Policy and Business Ethics Policy	
2012		First paid "Make Waves©" Summer Internship Programme		
2013		First Apprenticeship Programme		Launched 'Excellence' Leadership Development Program  Launched Tech City Stars
2014	Amsterdam data centre volunteered to join multi-year government initiative which mandated improvement of energy efficiency and reduction of carbon emissions  Initiated an 'SDH stop sell' campaign, leading to substantial reduction of power consumption			
2015	German data centres Rationalisation & Optimisation	Launched Graduate Programme	Published Anti-Modern Slavery Statement  Completed delisting from the Singapore Stock Exchange	Chose to support Young Enterprise
2016		Completed 'SDH stop sell' campaign		
2017				Launched Sales Engineering Academy
2018	Protecting Biodiversity: Removing Japanese Knotweed	Launched Mental Health & Wellbeing Programme across the whole business, with the goal of making mental health support available to all	GDPR compliance  Engaged with 'Let's talk talent' who helped develop 'Love to Learn' and employee performance & bonus schemes	
2019	Protecting Biodiversity: Protection of water voles, badgers and tree roots	Published 'The Book of euNetworks', a consolidation of selling information product knowledge, differentiators, metrics, success stories and sales training		Launched 'Flourish and Prosper', a Leadership Development Programme
2020	Engaged Avieco to understand our Planet impact e.g. GHG emissions, operational emissions hotspots, decarbonisation options		ISO 27001 Data Security certification	
2021	Won 'Showstopper of the Year: Strides in Sustainability', Microsoft Supplier Prestige Awards 2022	Launched 'You Belong Here' employee-led working groups	Senior Director, Sustainability role established with Tetyana Mozhayeva appointed	Formalised sustainability and making a positive impact as a core value



# Our Progress: Spotlight on 2021-2022

- Planet
- Prosperity
- People
- Partnership

Key successes and areas of focus in our sustainability journey.

## Planet

- Established carbon emissions 2019 baseline year
- Reported baseline emission data to the CDP, the gold standard of environmental reporting
- Set 1.5°C-aligned science-based targets, submitted for validation by the Science Based Target Initiative (SBTi)
- Dedicated graduate through 2021 supporting sustainability focus and development
- Signed the Climate Pledge to be net-zero carbon across our businesses by 2040
- Joined the SME Climate Hub
- Targets validated by SBTi Business Ambition letter accepted
- Winner 'Showstopper of the Year: Strides in Sustainability', Microsoft Supplier Prestige Awards 2022

## People

- Worked with 'Be the Riot' programme and launched 'You Belong Here' employee-led working groups across the business, empowering employees to influence the workplace in areas they are passionate about, for example diversity and inclusion
- Appointed three women to the Board of Directors, including two executives, demonstrating commitment to gender balance to strengthen the business
- Senior Director, Sustainability role established with Tetyana Mozhayeva appointed to the position, an internal move

## Prosperity

- Activated the ESG strategy while striving for continued growth and increased value for investors and other stakeholders
- Secured EUR760m Sustainability Linked Loan, based on robust KPIs: 100% renewable electricity for our own operations with 98% renewable electricity by 2023 and 30% women in the workforce by 2026
- Became a signatory to the UN Global Compact, formalising our commitment to operate in ways that meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption

## Partnership

- Further honing KPIs, setting targets, getting business buy-in and taking action across the themes of People, Planet, Prosperity and Partnership
- Assessed business impact and created a strategy to measure success, embed impact considerations into every aspect of the business and recognise 'sustainability' as a core value

## 2021



Sustainability considerations have always been an important part of euNetworks' DNA. In 2021 we took the decision to embed positive impact as a core focus for euNetworks and to formalise some of the initiatives started over the previous decade.

We were thrilled to announce the appointments of Paula Cogan as an Executive Director and President, Katherine Alexakis as an Executive Director and Chief Financial Officer, and Barbara Dondiego as a Non-executive Director. Tetyana Mozhayeva moved internally to lead as Senior Director, Sustainability, a dedicated role ensuring we embed sustainability into everything that we do. Tetyana has been instrumental in driving our sustainability agenda forward, along with our trusted Sustainability partners, Avieco, part of Accenture, Aeterra and Maanch. These appointments of women to senior leadership positions demonstrate our commitment to encourage diversity of talent which is a challenge across our industry. Finally, we were extremely proud that our new lender base recognised our future sustainability commitments in our EUR760m Sustainability Linked Loan.

- Richard Taylor, General Counsel and Sustainability, Corporate Development and People Lead



Pressure continues to mount on businesses from a range of stakeholders, who expect businesses to make ambitious, public commitments to decarbonise their operational and value-chain emissions. In 2021, Microsoft, one of our key partners, requested that we report our annual GHG emissions for scope 1, 2 and 3 in line with World Resources Institute (WRI) GHG Protocol, and set a target to decarbonise our baseline 2019 GHG emissions across Scope 1, 2 and 3 by 55% by 2030.

Based on our response, euNetworks won 'Showstopper of the Year: Strides in Sustainability' at the Microsoft Supplier Prestige Awards 2022. We were honoured to be selected from other strong finalists Brillio, Infosys, Schneider Electric and United Airlines.

This is in recognition of the commitment euNetworks has shown to pioneering climate change initiatives and alignment with its sustainability vision.

Nominees' innovative projects are scalable and repeatable, and their activities generate significant GHG reductions that are likely to be long-lived.

- Tetyana Mozhayeva, Senior Director, Sustainability



# Our Environmental, Social and Governance & Sustainability approach

2020-2022 has seen many uncertainties and challenges across the world and European region, including the pandemic, supply chain disruption, the Ukraine war, geopolitical tensions, and rising inflation. These have significantly impacted how we live and work. Against this backdrop of change and disruption, we are determined to lead our business thoughtfully and sustainably.

Through this sustainability report we aim to give our stakeholders an overview of how we have embedded ESG and sustainability considerations across euNetworks' core business and operations. We have used the Maanch Net Societal Impact (NSI) system to achieve a full overview of the positive and negative, intended and unintended consequences on social, environmental and economic touchpoints of our business activities. We now have an evidence-based roadmap and architecture which incorporates Environmental, Social, and Governance (ESG) considerations, measurement of our sustainability Key Performance Indicators (KPIs) against well-recognised disclosure frameworks such as the Sustainability Accounting Standards Board (SASB) and the UN Sustainable Development Goals (SDGs), with inspiration from the Global Reporting Initiative (GRI).



For our ESG and Sustainability considerations, our stakeholders include:

Regulators

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Customers

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Partners

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Investors

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Lenders

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Employees

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Suppliers

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Local communities

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Environment

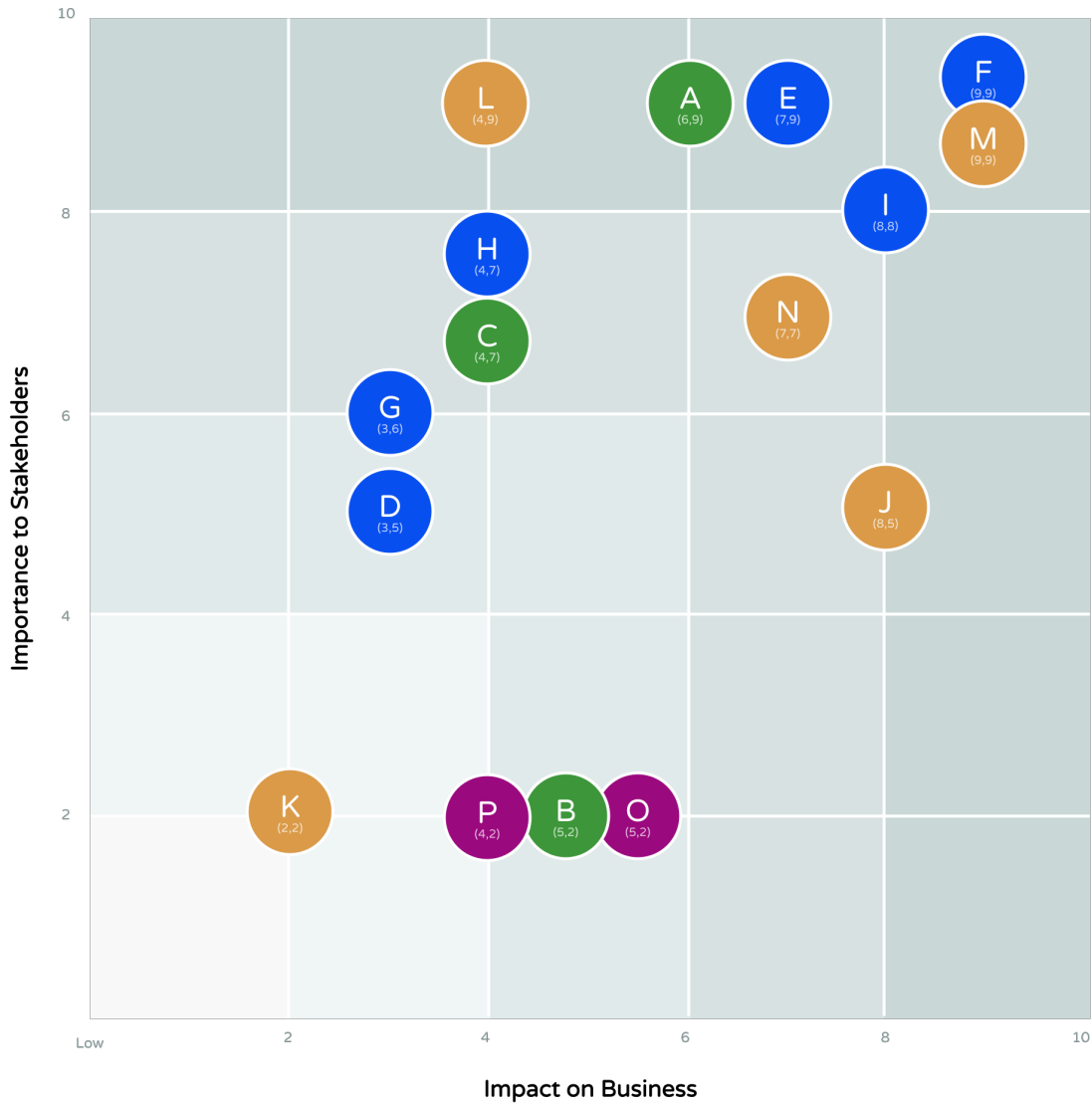
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This report focuses across four areas in which our business has influence:

- **Planet**  
Embedding the mitigation of environmental impacts on land, sea and air into all decision-making processes.
- **People**  
Developing a workforce that reflects the world, helping our people to achieve their true potential; managing the risks to anyone affected by our operations.
- **Prosperity**  
Empowering customers to make more sustainable choices and delivering sustainable returns to our investors.
- **Partnership**  
Creating shared value in the communities in which we operate.



# ESG Materiality Matrix\*



## Planet

- A. GHG Emissions
- B. Energy Management
- C. Ecological Impacts

## People

- D. Human Rights & Community Relations
- E. Customer Privacy
- F. Data Security
- G. Labour Practices
- H. Employee Health & Safety
- I. Employee Engagement, Diversity & Inclusion

## Prosperity

- J. Supply Chain Management
- K. Materials Sourcing & Efficiency
- L. Physical Impacts of Climate Change
- M. Business Ethics
- N. Systemic Risk Management

## Partnership

- O. Community Engagements
- P. Branding and Reputation

\*This was undertaken through desktop-research and analysis of operational issues informed by euNetworks' employees, with reference to SASB and the GRI standards. Future revisions will follow a broader and more direct stakeholder engagement process to enhance the materiality assessment process.

Our approach to materiality is based on our commitment to responsible growth while making a positive impact on the world. We believe that our chosen strategy to grow while operating a sustainable business model helps to meet our customers' bandwidth needs and to deliver returns to our investors while addressing some of society's biggest challenges. We use this approach to evaluate the environmental, social and governance issues that are most material to euNetworks. The results of our materiality assessment, to identify, refine and assess potential material topics to the business and its stakeholders, are visualised above.

### Ecological impacts

Management of the company's impacts on ecosystems and biodiversity, including through project development.

### Employee Health and Safety

Company's ability to create and maintain a safe and healthy workplace environment that is free of injuries, fatalities and illness. How companies ensure physical and mental wellbeing of workforce.

### Energy management

Environmental impacts associated with energy consumption. Management of energy in provision of products and services derived from utility providers not controlled by the company.

### GHG Emissions

Greenhouse gas emissions that a company generates through its operations. Management of regulatory risks, environmental compliance, and reputational risks and opportunities, as they relate to direct GHG emissions.

### Human rights and community relations

Management of the relationship between businesses and the communities in which they operate, e.g. impacts on core human rights and the treatment of indigenous peoples, environmental justice, licence to operate, environmental and social impact assessments, etc.

### Labour practices

Company's ability to uphold labour standards in the workplace, including compliance with labour laws and internationally accepted norms and standards.

### Materials sourcing and efficiency

Addresses issues related to resilience of material supply chains to impacts of climate change and other external factors. This also captures impacts of environmental and social factors on operational activity of suppliers.

### Physical impacts of Climate Change

Ability to manage risks and opportunities associated with exposure of assets to potential physical impacts of climate change, including from resultant operational disruptions.

### Supply Chain Management

Management of ESG risks within a company's supply chain including emissions, environmental responsibility, human rights, labour practices and ethics and corruption issues created by suppliers through their operational activities.

As reflected in the Materiality Matrix on page 9, the following areas are of high relevance to the business and its stakeholders, and are accordingly prioritised in our plans:

### Business ethics

Approach to managing risks and opportunities surrounding ethical conduct of a business. Includes sensitivities to business norms as they shift over time, jurisdiction and culture.

- We have a comprehensive and longstanding Business Ethics Policy.

### Data security

This topic encapsulates management of risks related to collection, retention, and use of sensitive, confidential, and/or proprietary customer or user data.

- We test annually the effectiveness of perimeter security controls to prevent and detect attacks (external penetration testing). We run vulnerability scans on a scheduled basis.
- We run a Security Information Event Management (SIEM) platform to detect anomalies within our network.
- We have never had a significant data breach.



## Employee engagement, diversity & inclusion

This aspect encapsulates the ability to ensure that culture and hiring and promotion practices embrace the building of a truly diverse and inclusive workforce.

- We have placed a focus on narrowing the gender gap.
- Initiatives include: women on hiring panel, inclusive behaviours training, D&I statement in job adverts, discontinuing referral fees.
- Our formal hybrid working policy is operational across the organisation.

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## Customer privacy

This aspect encapsulates management of risk as related to the use for secondary purposes of personally identifiable information and other customer or user data, including marketing through affiliates and non-affiliates.

- Our Information Security Management System is centred on supporting our customer, partner and internal data security requirements, in line with our Customer Data Privacy Policy.
- Measures ensure confidentiality and authenticity.

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## Systematic risk management

This aspect encapsulates contributions to our management of systematic risks resulting from large-scale weakening or collapse of systems upon which the economy and society depend.

- We have measures in place to address business continuity risks, including identification of critical business operations, and to enhance resilience both within the ISO 27001 framework and as part of our internal audit function.
  - This includes business impact, practice and test plans, crisis management and specific recovery plans to ensure adequate delivery of all products and services to our customers 24x7x365.
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# An Overview

## Achievements and Ambition

### Planet

### Impact of business activities on all environmental factors

#### Achievements

Started measuring carbon footprint across Scope 1, 2 and 3 (2019 baseline), set SBTi validated targets

Network construction carbon tool

- Decision making tool
- Enables sales dialogues, comparing emissions for specific network designs as well as costs
- Piloted with a key customer

Renewable Energy Procurement Strategy for German colocation sites completed

Operational

- Amsterdam data centre has highest standards of security, cooling and power density
- Network design, new fibre-less ILAs
- Articulate construction impact
- Equipment reuse and recycling

Winner, 'Showstopper of the Year: Strides in Sustainability', Microsoft Supplier Awards 2022

#### Ambitions

Net Zero carbon commitment by 2040

98% renewable energy procurement by 2023

Carbon emissions tool for all services under development



### People

### Strong, inclusive talent development programmes

#### Achievements

Apprenticeships: 36 (2013–2022) with 14 still employed

Graduate programmes: ten joiners in 2020; six of nine (2015 and 2017) graduates are still employed

Leadership development: programmes for management & for employees at early stage of career (open to all employees, c. 20% participate)

Worked with 'Be the Riot' programme and launched 'You Belong Here' employee-led working groups across the business, empowering employees to influence the workplace in areas they are passionate about, for example diversity and inclusion

Mental Health awareness programme: 32 trained Mental Health Allies<sup>(1)</sup>; 100% of employees and managers are trained

Weekly 'all hands' employee engagement meetings throughout COVID-19 lockdown

26% women in workforce as of December 2021

GDPR compliant with ISO 27001 certified data security

#### Ambitions

Gender Goal:

- 30% women in the workforce by 2026
- 35-40% women in the workforce by 2030





# An Overview

## Achievements and Ambition

### Prosperity

Financial and economic impact enabled by the business through strong governance

#### Achievements

Wholesale, finance, content, media, data centre & enterprise customers benefit from euNetworks' inventory of fibre duct-based assets, innovative and efficient creation of infrastructure and competitive service delivery

Sustainability Linked Loan (SLL) linked to social and environment sustainability performance targets (SPT) secured in December 2021

Strong corporate governance, strengthened with appointment of three female directors in 2021

No accident and safety-related fatalities recorded

#### Ambitions

Climate-related risks to be incorporated into financial statements

Commercial vendor due diligence policies under development



### Partnerships

Net impact of strategic partnerships

#### Achievements

Worked closely with third-party suppliers during COVID-19 to ensure continuity of critical network equipment supply

Supplier workshops for sharing best-practices in sustainable construction

Supplier-driven engagement for vendor carbon reduction

Collaborating with Ciena on sustainability

LDN Apprenticeships partnership since 2013

Volunteering with Young Enterprise charity partner since 2015

Donation of a rack and IP access enabling Projekt 100% MENSCH, who promote legal and social equality for queer people, to have an online presence

Employees actively engaged in community and charitable initiatives

#### Ambitions

Plan on collaborating with organisations and creating a strategy for employee-driven volunteering initiatives, including to minimise impact on environment



(1) Mental Health Allies are a point of contact for employees who are experiencing a mental health issue or emotional distress and looking for support

# Planet

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# Carbon reduction

To reduce our carbon footprint, we are identifying and implementing greenhouse gas (GHG) emissions reduction initiatives.

## Background and Materiality

euNetworks has taken a best practice approach to carbon footprinting, working with Avieco, part of Accenture, to conduct a comprehensive carbon footprint analysis including Scopes 1, 2 and 3 based on 2019 data.

## Rationale and Ambition

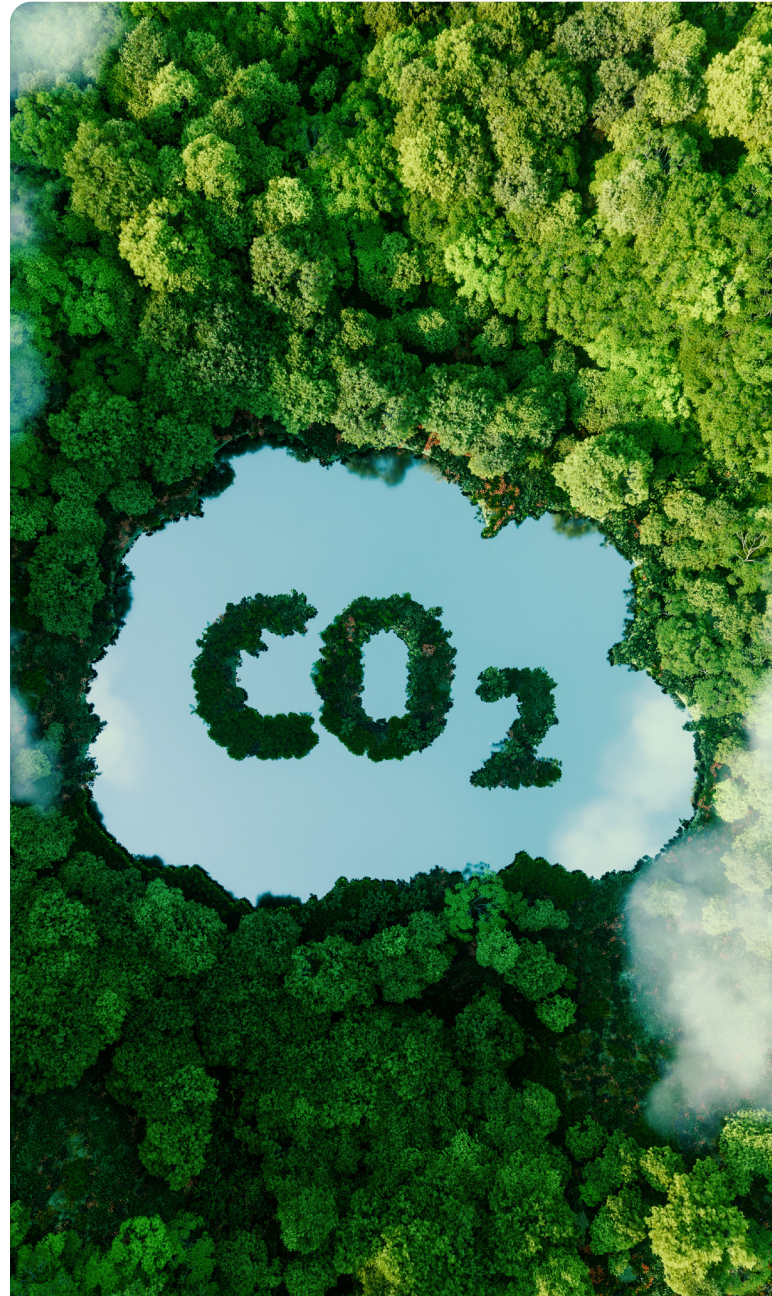
euNetworks has set emissions reduction targets through the Science Based Targets initiative (SBTi) which is the international scientific expert in the evaluation of company climate targets. The long-term nature of the science-based targets guarantees that we have defined an ambitious roadmap to drive down emissions across our business and our entire value chain.

## Our Journey

In May 2021, we established our baseline carbon footprint using a best practice approach in line with GHG Reporting Protocol, for Scopes 1, 2 and 3, for our baseline year, 2019:

- We reported our 2019 emissions to the CDP.
- We agreed on our GHG Reduction Roadmap to achieve at least a 55% reduction by 2030.
- We set 1.5°C-aligned science-based targets validated by the Science-Based Targets Initiative (SBTi) across all three scopes.
- We signed the 'Business Ambition for 1.5°C':
  - publicly committing to a 1.5°C-aligned decarbonisation target for scope 3 GHG emissions;
  - becoming one of the first 1,000 of the world's largest companies laser focused on tackling environmental impact; and
  - Committing to net-zero no later than 2050.

- In February 2022, we brought our net zero target forward by ten years, setting an aggressive net zero climate pledge for 2040.
- We are implementing key actions from our comprehensive Avieco Decarbonisation Report to reduce baseline carbon emissions at a scale that satisfies external stakeholders.





## Our Emissions

euNetworks disclosed a CDP response for the first time in 2021, using 2019 as a baseline year. The company is committed to continue CDP reporting as a vehicle to communicate achievements of the climate actions taken in the areas of greenhouse gas emissions, energy consumption, and supply-chain driven emissions.

	2021 Value (tCO <sub>2</sub> e)	2019 Reported (tCO <sub>2</sub> e)	2019 Restated (tCO <sub>2</sub> e)	Δ on restatement	Δ 2021 to 2019 (restated)
Scope 1	17	24	24		-30%
Scope 2 (Market Based)	3,812	4,575	4,191	-8%	-9%
Scope 3	57,538	15,779	75,922	381%	-24%
<b>Total</b>	<b>61,367</b>	<b>20,379</b>	<b>80,137</b>	<b>293%</b>	<b>-23%</b>

Scope 2 (Location Based)	8,833	13,104	12,275	-6%	-28%
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### euNetworks Greenhouse Gas Emissions

euNetworks has restated the 2019 baseline carbon footprint due to (i) significant improvements in data quality and the inclusion of 'well-to-tank' (WTT emissions), which have materially increased total emissions; and (ii) movement of some shared sites from Scope 2 to Scope 3. The overall impact is a 3x increase in the Scope 1, 2 and 3 emissions for baseline year 2019.

The improvement in data quality primarily impacted Purchased Goods & Services and Capital Goods. We have worked with our suppliers to prepare a significantly more accurate categorisation of spend down to the type and length of duct and fibre and improved use of data. We have sourced product-specific life cycle assessment data. Across these categories the 2019 baseline emissions increased 9x. Both Purchased Goods & Services & Capital Goods emissions sources have decreased in 2021 (by 20% and 35% respectively) relative to 2019 (restated), despite a small (4%) increase in spend.

WTT emissions are the GHG emissions from the production, processing and delivery of fuel. There are WTT emissions associated with all fuel and power consumption, including renewables.

Overall, 2021 Scope 1, 2 and 3 emissions reduced by 23% compared to the 2019 (restated) baseline. This represents good movement towards our net-zero target, notwithstanding a number of headwinds within Scope 3. These include growth

in euNetworks' business and increased overall spend, a 3.5x increase in Fuel & Energy related activities arising from evolving best practice in carbon reporting. This means we have reported the WTT emissions for Scope 2 and Scope 3 energy use and a 111% increase in Upstream Transportation & Distribution emissions resulting from the laying of the Scylla sub-sea cable in 2021.

Scope 2 emissions reduced by 9% in 2021. The largest cause for this (as can be seen from the reduction in Location-Based emissions, i.e. emissions before taking account of procurement of renewable energy) is increased renewable power being available across the electricity grids. See further section II below.

Travel-related emissions such as business travel and employee commute were suppressed by the ongoing impact of COVID-19 throughout 2021, although these emissions will rebound to an extent in 2022 as travel restrictions are relaxed and employees have returned to offices on a hybrid basis. euNetworks reported working from home emissions for the first time in 2021, which contributed 0.4% of overall emissions and on balance exceeded the saving on employee commuting.

Work with our third-party data centre and colocation ILA suppliers gave us increased visibility of their renewable energy procurements, allowing for a large (71%) decrease in euNetworks' emissions from use of their facilities.

## CASE STUDY



## Carbon Reduction Case Study: creating a new tool

We have launched the euNetworks Network Construction Carbon Tool to assess the impact of network construction projects and provide transparency around the emissions impact of solutions we propose to customers.

The tool enables us to estimate the incremental carbon impact of new network construction projects to identify the lifetime emissions cost of a project and carbon hotspots and drivers.

We can use the outputs to iterate designs and engage with our suppliers to target emissions reductions. The methodology behind the tool is based on the principles of the World Resource Institute's GHG Reporting Protocol, Product Accounting Standard and PAS 2050.

Our aim is to work closely with customers to choose the best solution that helps meet their business growth goals.

# Renewable energy procurement

Renewable energy is derived from natural processes that are replenished constantly. Renewable energy stands in contrast to fossil fuels, which are being used far more quickly than they are being replenished. By switching to renewables, we can help to reduce environmental pollution and improve public health.

## Background and Materiality

One of euNetworks most immediate and impactful opportunities to reduce emissions is to increase renewable energy procurement across our owned sites.

## Rationale and Ambition

We have worked with our lenders to set a KPI to be effectively wholly procuring renewable power in 2023.

## Our journey

- Electricity for the Amsterdam PVV data centre is purchased from a 100% renewable wind source.
- In 2019, when comparing Location-Based and Market-Based emissions, 65% of euNetworks' total electricity was procured from renewable sources. When measured as a percentage of power in KWh procured from renewable sources, this figure was 46%.
- In 2021 we procured 51% of our power (KWh) from renewable sources.
- In 2021, we negotiated and completed a power purchase agreement to switch all of our German colocation sites to 100% renewable power with effect from 1 January 2022. For illustration purposes, if this power purchase agreement had been effective from 1 January 2021 then 98% of our power (KWh) would have been procured from renewable sources.
- All power for new sites is sourced on renewable tariffs.
- We are executing a programme to complete the transfer to materially all renewable power in 2022. Given the German colocation power purchase agreement, we are well placed to achieve this.



# Biodiversity

Biodiversity is more than the collection of plants and animals on earth; it is about local ecosystems and promoting healthy conditions for organisms to thrive.

## Background and Materiality

Businesses have a responsibility to ensure they are not harming ecosystems, but more than that, that we are contributing to regeneration of nature.

## Rationale and Ambition

We always ensure we play our part to promote and preserve biodiversity in communities in which we live and work. We will engage in a variety of projects supporting governmental and NGO activities to conserve life on land and under the sea, sustainably interacting with the oceans, seas and marine resources.

## Our journey

### → Water voles and trees

For one of our Essex-based projects, while surveying a canal route in Lea Valley, we came across protected water voles. Our team engaged local ecologists and our guidelines for completing works were initiated. Conservation-friendly methods were implemented, which involved supplying feeding tables to the voles and hand-digging to avoid impacting their runs and habitat.

In addition, the planned route was going along a major road with a rich tree line. After taking expert advice, we moved the planned route to avoid the trees, incurring incremental cost to the project.

### → Badgers

When surveying routes for our Super Highway 1 routes near Doncaster, various badger sets were identified. We engaged with ecologists to minimise our impact on the sets, e.g. avoiding breeding season.

### → Japanese Knotweed

While doing installation works for one of our projects, we came across Japanese Knotweed, a non-native highly invasive plant. We undertook removal of the weed and ensured it was destroyed under strict containment guidelines.



## CASE STUDY



## DCs for Bees

Bees are an indicator species. Their vibrancy on earth aids in gauging the health of ecosystems. They are crucial in more than 70% of the country's food production, yet, according to the National Biodiversity Centre, at the current rate of decline, 90% of bumblebees in Ireland will be wiped out by 2050.

Director of Cloud and Content Infrastructure Engineering at euNetworks, Conor McGovern, acts as a DCs for Bees Ambassador.

DCs for Bees has attracted industry support and involvement from all sides. euNetworks supports their "Orchards in the Community" initiative, which, in 2021, involved planting over 1,000 mixed fruit orchards all over Ireland.

“ This initiative is a great way of bringing all parts of the Irish community together, giving back to and supporting the development of a hopefully thriving ecosystem in the years to come.

\*National Biodiversity Centre



# Operational sustainability

Managing the impacts of our operations on all environmental factors, including air, land and water to ensure we can continue to thrive in the future.

## Background and Materiality

All businesses have impacts through their operations, direct and indirect, intended and unintended.

## Rationale and Ambition

We want to ensure that our impacts are measured and managed appropriately, in line with our core value of making a positive impact on society and our world.

## Our Journey: Network design with new fibre and fewer inline amplifiers (ILAs)

Sustainability is front of mind in the design of new customer networks. This includes our approach to choosing suppliers, materials, equipment, routes, and technologies. Emission factors have become as important to us as underlying costs of constructing new networks.

## Equipment reuse and waste recycling and management

Our data centre managers will roll out an initiative to train employees on company-wide and site-specific procedures to operationalise zero waste. We will continue to identify opportunities to implement the circular economy and use recycled and renewable materials.



## CASE STUDY



## Operational sustainability - PVV

We operate a premium data centre facility in Amsterdam, the Netherlands. The facility has been designed to the highest standards of security, cooling and power density to meet the rigorous requirements of a modern data centre. It runs on 100% renewable energy from wind farms.

In 2014 we volunteered an euNetworks Amsterdam Data Centre to be a part of a new multi-year government initiative which mandated the improvement of energy efficiency and the reduction of carbon emissions across data centres within the Netherlands.

We identified two significant projects to be carried out at a cost of EUR890K with a forecasted ROI term of between four and five years:

Chiller Replacement - the new chillers used 20% of the energy used by the old chiller;

Close Control Unit (CCU) Upgrade - The upgraded CCUs used 74% of the energy used by the old CCUs.

Alongside this, a new Energy Management System (EMS) was put in place that gave even greater control on how the energy consumption influenced the environment.

We have seen a significant increase in power efficiency since implementing the two projects and PUE (Power Usage Effectiveness, an indicator of the energy efficiency of a data centre) improved from 2.1 to 1.6. Reduced maintenance costs and no longer having to replace faulty parts contributed significantly to the ROI timelines.

Other energy-saving initiatives at the site include:

1. cold corridors,
2. cooling tiles,
3. tile brushes,
4. blind plates, and
5. pressure release shutters.

## Expert Review



Aeterra is a full-service environmental and sustainability consulting firm. Aeterra conducted an Environmental Review of euNetworks to identify potential and known environmental liabilities related to:

1. environmental impact,
2. regulatory compliance, and
3. health and safety,

as well as other environmental sustainability considerations related to the euNetworks business.

The review included a combination of site inspections and desktop reviews of current facilities. Aeterra's review did not identify environmental liabilities or material risks to euNetworks; the review indicated that euNetworks has made substantial progress toward sustainability commitments that are in line with above industry best practices.

With regards to environmental impact or contamination, euNetworks' progress and commitments include:

- A formal decarbonisation strategy, which is aligned to Science Based Targets and Net Zero.
- A Sustainability Linked Loan aligned to a renewable energy key performance indicator.
- Building energy savings projects conducted at Amsterdam and underway at Germany facilities.
- Developing additional strategic sustainability initiatives with assistance from a long-time reputable sustainability firm providing integrated technology and advisory solutions (Maanch).

These were found by Aeterra to be in line with above industry best practices.





# People

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# Diversity and inclusion

## 'You Belong Here'

### Background and Materiality

The importance of building a diverse and inclusive workforce is increasingly a priority across industries. The telecoms industry is no exception.

### Rationale and Ambition

We aim to be as diverse as the world we live in, and to make everyone feel included, respected and able to bring their full self to work. We want to be an attractive, equal opportunities employer, offering a safe and inclusive workplace and supporting all our people to reach their potential through personal and professional development.

Striving for gender equality across the organisation increases diversity of opinions and experiences, is more reflective of the markets euNetworks serve, and will accordingly improve decision making.

### Our Journey

We have implemented initiatives to ensure new talent is diverse in all respects and hired fairly through inclusive recruitment (e.g. women on hiring panel, inclusive behaviours training, D&I statement in job adverts, discontinuing referral fees).

Our formal hybrid working policy is operational across the organisation.

'You Belong Here' is an euNetworks initiative to embrace diversity and support an inclusive culture through different employee networks.

## Six 'You Belong Here' groups meet regularly:

### Age Group

To create an environment, promoting equal treatment for all, to allow everyone to reach their potential, regardless of gender or gender identity.

### Celebrations Group

To highlight our various cultures and beliefs whilst celebrating our diversity.

### Enablement Group

To make euNetworks accessible and welcoming for people of all physical, mental and learning abilities.

### Engagement Group

To ensure that 'You Belong Here' effectively engages, and clearly reflects and represents the whole euNetworks community.

### Generational Group

To harness talent from all generations, by talking and listening to each other, learning from others' experiences, and making sure everyone's voice is heard.

### Rainbow Group

To support LGBTQ+ employees on their personal journeys by creating an inclusive and safe space for them and for their allies.



As a member of the LGBTQ+ community, being part of the 'You Belong Here' initiative is hugely important to me. It gives me the opportunity to share my story and my journey with those who may be at the beginning of theirs.

It is so important for me to hear new ideas from co-workers by enabling me and them to have a voice through the diversity platform. This provides me with the opportunity to learn from others

- Catherine

## CASE STUDY



## Olena's story: A case study of employees thriving

Olena had been successfully working her way up at euNetworks, from receptionist to Manager of the Accounts Payable team, when she became a mother. Becoming a single parent with no local family to lean on, Olena's circumstances were very difficult.

“ If euNetworks hadn't been so supportive the last few years would have been unimaginable. My team and managers understand that we are all just people. We all support each other. We always find a solution.  
- Olena

After spending her maternity leave in her native Ukraine, Olena made the tough decision to leave her daughter in the care of her parents there, and return to the UK alone. Upon returning to work, Olena's team and managers wanted nothing more than to see her succeed. She was offered additional responsibility to further her prospects, and she was able to visit her daughter every other week. Just when Olena brought her daughter to the UK to live together, she and her team had to cope with the disruption caused by COVID-19.

“ In lockdown my daughter was next to me, or on my lap the whole time. That was no problem with work. My team was super-supportive. And we have a hybrid setup now, which creates so much flexibility.

Supporting people with caring responsibilities makes euNetworks an attractive prospect for new talent, tapping into a valuable portion of the population. In turn, euNetworks' support of employees like Olena has numerous benefits for the organisation and its future.

# Attracting, developing and retaining talent

A business owes its success to its people, they are its most important asset.

## Background and Materiality

euNetworks has long identified its employees at all levels as being the core of its operations and has thus strived to foster a culture of internal development and growth, and one which enhances all-round well-being. For this reason, attracting and retaining the best talent is a 'top priority' on our leadership team agenda.

## Rationale and Ambition

In line with euNetworks' ambition to become telecoms business employer of choice for women, euNetworks is committed to creating a culture of inclusiveness where women feel supported.

euNetworks had 26% women in its workforce as of December 2021. It has set a goal to achieve at least 30% women in its workforce by 2026 (2020 baseline at 25.1%), 35-40% by 2030.

Despite challenges faced by the industry in attracting and retaining women, we have women occupying senior leadership positions. They are role models for women across the organisation, and those thinking of applying, showing that they too can thrive at euNetworks.

## Our Journey

We take developing talent seriously, running programmes each year across our offices. Programmes for entry-level joiners pass on technical skills and knowledge, offer paid opportunities, real projects and development paths.

## CASE STUDY



## Poppy's story: A case study of employees thriving

Poppy was 17 when, uninspired by her sixth form education, she found herself skipping classes to work part-time jobs. Feeling dissatisfied by this situation, Poppy decided that she needed to work in a professional environment. Poppy's search for an apprenticeship led her to the Tech City Stars and LDN Apprenticeships, through which she was introduced to euNetworks.

Poppy secured a place on the sales engineering apprenticeship, and completed a 13-month programme, after which she was offered a full-time role. She has since been promoted four times, more recently to Sales Engineer.

“ I am really proud of my journey. If I'd taken a different placement things could have been completely different. I have been really pleased with the progression and the care and attention that apprentices are given at euNetworks. I can't fault them on anything.

Poppy is part of the Sales Engineering Academy, a further source of support and training within euNetworks.

The impact of the partnership is clear - Poppy is thriving in a career she might never have accessed. There is another layer of impact too though. With people like Poppy in post, euNetworks gains a valuable and different perspective which can shape a more diverse, open and flexible future for the business.

## CASE STUDY



## Kristina's story: A case study of employees thriving

In 2015, Kristina had just finished university and was looking to gain the experience much prized by recruiters. She heard about the euNetworks intern programme through a friend who was working there, applied, and successfully secured a summer internship placement in the marketing team.

Following an exciting and fulfilling 8 weeks Kristina, along with four others, went on to achieve a place on the euNetworks graduate programme, starting in marketing. She was given the hands-on experience she was looking for, as well as long-term guidance and help to make sure she was on the right track. Kristina's journey brought her into contact with managers from across the business, with other functions and disciplines, affording her a broad and thorough understanding of the professional landscape.

As part of the programme, Kristina grabbed the opportunity to work overseas, leaving her native Frankfurt and taking a role abroad. Here she found that working life was different and there was a lot to learn, but the people were the same; open-minded, experienced, easy to talk to, and always willing to help.

After completing this incredibly eye opening programme, and all that it entailed, Kristina was offered a permanent contract as an assistant service manager which she happily accepted. She has stayed on to become an analyst, and is now a manager with two direct reports. The breadth of experiences and guidance offered to Kristina helped her forge a path towards a flourishing career, and her open-mindedness and experience will in turn benefit those led by her.



## Initiatives

### Apprenticeship programme

In 2013, an apprenticeship programme was introduced. The programme continues to be an important pipeline for talent and its retention rates are high. 36 apprentices have joined euNetworks through the programme and 39% remain employed today, over 40% are women. In May 2022, five more apprentices were welcomed in the new intake.

### Continual training and development

In 2020, we launched 'Love to Learn', providing personal development opportunities to all. As a series of workshops that any employee can sign up to, 'Love to Learn' provides help, support and reflection on key skills and topic areas that affect us all and are an important part of developing careers at euNetworks.

### Graduate programme

The 2-year graduate programme is an excellent starting point for young talent joining the telecommunications industry. Launched in 2015, we have welcomed 19 graduates across our London and Frankfurt offices. Six former graduates are in full-time employment with us, with nine of the 2020 intake nearing the end of their programme. 40% of the 15 are women.

Speaking to employees who joined euNetworks through one of these programmes, it is clear they receive vital support at every stage from our people, from hiring managers to team members, as well as from official and unofficial mentors. Helping our people to thrive is a huge part of our culture, something we are proud of and which sets our teams up for success.

### Leadership programme

There's a culture of internal leadership development, promoting from within, and retaining staff in the long term. Our leadership development programme provides future leaders with resources to engage, influence, coach, drive change and increase growth.

### Summer Internship Programme

At euNetworks, we take developing talent seriously. We run an intern programme passing on technical skills and knowledge and offering work experience opportunities for individuals to make connections, work on relevant projects and gain entry-level exposure to our industry.

### Key Stats

20% of women currently employed joined euNetworks through one of its training programme (apprenticeship, internship or graduate):

- in 2019, two of the seven interns were women;
- our 2020 graduate programme was split 40% to 60% between women and men, all nine participants are still employed with us;
- of the two participants on our apprenticeship programme in 2021, the woman participant is still employed with us.

42% of women currently employed have been promoted or changed position during their employment.

At euNetworks, gender does not affect the length of service. The average is five years across the company.

# Mental health and wellbeing

## Background and Materiality

euNetworks is committed to building a mentally healthy workplace culture to enhance all employees' mental wellbeing.

## Rationale and Ambition

When someone joins euNetworks, they will be respected for who they are, while being supported in their development in order to deliver excellent results for our customers.

We listen to our people, understanding that individuals need different support at different times.

## Our Journey

euNetworks launched a program designed to support mental well-being.

## Initiatives

All new joiners go through six-hours of awareness training that provides:

- mental health understanding,
- a common language and know-how to enhance, maintain, and restore mental wellbeing,
- guidance on how to recognise the early warning signs of declining mental health, in themselves and others,
- the confidence to seek and offer support as early as possible.

euNetworks has a high ratio of Mental Health First Aiders, a point of contact if an employee, or someone they are concerned about, is experiencing a mental health issue or emotional distress.

In October 2021, we trained our second cohort, bringing the total to 32 Mental Health First Aiders across the organisation in Germany, Ireland, the Netherlands, and the UK.

We have seen a growing open and inclusive workplace culture that displays respect and care for each other's mental health, not only supporting colleagues when needed, but also challenging discrimination and bias.

# Human rights

euNetworks respects and supports internationally recognised human rights standards and will undertake to prevent any and all actions regarded as human rights violations in its operations and value chain, in accordance with our statement against modern slavery.

## Our Journey

All new joiners receive a copy of our Anti-Corruption and Bribery policy. They also attend a compulsory Anti-Corruption and Bribery training seminar arranged by our Legal department.

# Data security, customer privacy and business continuity

## Background and Materiality

Our Information Security Management System is centred on supporting our customer, partner and internal data security requirements. We are fully compliant and certified with the industry security standard ISO 27001.

## Rationale and Ambition

ISO 27001 is a leading international standard on how to manage information security. We operate an Information Security Management System (ISMS) framework and are internally and externally audited against ISO 27001:2013. Within this framework, we cover business continuity, ensuring adequate delivery of all products and services to our customers. This includes business impact, practice and test plans, crisis management and specific recovery plans.

## Our Journey

While cyberattacks become more common and complex, euNetworks' IT security team has implemented significant improvements to identify and mitigate threats. Cyber attacks on active equipment are handled within the overall security framework, which is compliant with or goes beyond national regulations for telecommunication service operators and is maintained in the ISO 27001 framework to ensure:

**Confidentiality and Authenticity:** Protection of telecommunications data and personal data, e.g. encryption, virus/malware scanning, awareness trainings;

**Integrity:** Protection of programme-controlled telecommunications and data processing equipment against unauthorised access, e.g. Security domains, 2FA, PEN-Tests, implementation of CERT alerts; and

**Availability:** Protection of systems against disruptions that lead to significant impairments of telecommunications networks, e.g. DDoS detection and mitigation.

## Key stat

We can confirm we have never had a significant data breach.

# Prosperity

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# Leadership, governance and commitments

## Background and Materiality

We are committed to universal sustainability principles and to socially responsible business practices, driven through our leadership team and broader governance.

## Rationale and Ambition

We are not only striving to improve our own practices, but also seek to work together with other organisations that share our values to tackle problems head-on, maximising positive impact.

## Our Journey

euNetworks has appointed a full time resource to manage its sustainability strategy, and continues to diversify its board with the recent appointment of three women.

Our aim is to implement our new sustainability policy and form a sustainability committee to help inform our response on sustainability issues.

euNetworks shows its commitment to the UN SDGs through its participation in the UN Global Compact, and by signing up to support the SME Climate Hub.

The securing of a Sustainability Linked Loan is further evidence of euNetworks' dedication to a more sustainable future.

## Key Stats

### → The UN Global Compact

UN Global Compact is the world's largest corporate sustainability initiative. According to the compact, which aligns with euNetworks' view and approach, corporate sustainability starts with a company's value system and a principles-based approach to business. As a signatory, we operate in ways that meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption, setting the stage for long-term success.

### → SME Climate Hub

The SME Climate Hub provides small and medium-sized businesses with a one-stop-shop to make an internationally recognised climate commitment, join the United Nations' Race to Zero campaign, and access best-in-class tools and resources to mitigate their environmental impact and build resilient businesses for the future.

The SME Climate Commitment includes:

- halving GHG emissions before 2030,
- achieving net zero emissions before 2050,
- disclosing progress on a yearly basis.

euNetworks signed the commitment on 16 February 2022.

### → Sustainability Linked Loan

As part of the debt refinancing exercise euNetworks undertook late in 2021, we were able to secure sustainability-linked debt funding of EUR760M, at a potentially reduced rate, linked to social and environmental performance indicators. This is further evidence of our continued commitment to embed sustainable practices, transparency and accountability into our core business practices, playing an important role in supporting our future business plans.



# Accident and Safety Management

## Background and Materiality

The Health and Safety (H&S) of all our employees, contractors, customers and members of the public who may be affected by our operations is of paramount importance to us.

## Rationale and Ambition

We ensure the health, safety and welfare at work of all employees, and manage our business as far as we can to ensure we do not expose people to risks. Our H&S policy is reviewed by management as required.

## Our Journey

Our objectives are to:

- reduce risks and prevent injury and loss due to damage;
- identify H&S hazards and manage those to effectively control the risks; and
- work to safety standards which reflect good industry working practices.

Our motto is "if it's not safe, don't do it!". We can confirm we have not had any accident and safety-related fatalities.

# Responsible procurement through our value chain

## Background and Materiality

To ensure that our ambitions and targets are echoed through the operations of all partners associated with the delivery of our products and services, euNetworks will take steps to increase the sustainability of its value chain.

## Rationale and Ambition

We adhere to, and expect from suppliers, good conduct in business and risk management, with all areas of the business carried out in a responsible manner and in compliance with applicable laws and regulations, including regarding Anti Modern Slavery, Data Privacy, Bribery and Corruption.

## Our Journey

We are in the process of implementing a new Supplier Code of Conduct. The roll-out plan is in development.

euNetworks will do what it can to promote greater environmental responsibility with regards to its material sourcing.





# Partnerships

Strategic community partnerships

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# Strategic community partnerships

## Background and Materiality

The impact of our strategic partnerships.

## Rationale and Ambition

At euNetworks we believe in the power of collaboration and trust. We demonstrate this belief through the impact of our strategic partnerships that leverage our core business operations, but also by those partnerships that go beyond our usual course of business.

## Our Journey

We can achieve more if we collaborate and combine efforts with strategic partners within our industry and with governments and community organisations local to where we operate.

Based on our past successes and our commitment to making a positive impact, we will continue to support community initiatives and encourage our people to volunteer for the initiatives they are most passionate about.

## Initiatives

### LDN Apprenticeships

Since September 2013, euNetworks has run a strong apprenticeship programme with intake steadily growing towards a 50% man-to-woman split. This continues to be an important pipeline for talent as many participants go on to be employed at euNetworks.

### Young Enterprise

To assist in creating new skills and inspiring new talent, euNetworks supports Young Enterprise. They are a charity in the UK, helping school children with employability skills such as interviews and CV writing. We support them through both fundraising and volunteering. In 2021, through a corporate partnership where pupils create a business idea and product, we had a team of our volunteers mentoring kids. We intend to continue to develop this partnership, to build STEM literacy and increase relevance, to get students interested and ready for careers in our industry.

## CASE STUDY



### A strategic community partnership

Key to the success of the partnership between LDN Apprenticeships and euNetworks is our shared ideology: that all young people, regardless of background, deserve opportunities and can bring value.

“ At LDN Apprenticeships, our mission is to create opportunities for diverse talent to realise their potential. Since 2013, euNetworks has played a huge part in helping us to deliver on that mission. Since the start of our partnership, the leadership team at euNetworks has shown unwavering commitment to bringing new apprentices into their organisation. As a result of their foresight and strong leadership, many of the apprentices who have joined euNetworks have started extremely promising and exciting careers - careers that may not have been available to them without the support of euNetworks. This focus on supporting young people into the world of work is one of the many reasons why we are proud and grateful to have Richard Taylor, euNetworks General Counsel, as the Chair of the LDN Board of Directors. Richard has served as Chair and non-executive director since September 2016. During this time he has helped LDN Apprenticeships to formulate its strategy, stay true to its purpose and impact the lives of thousands of young people.

This unique partnership is a testament to euNetworks' commitment to creating a fairer and more equal society and we are excited to build on its success in the years ahead.

- Simon Bozzoli, CEO LDN Apprenticeships

## CASE STUDY



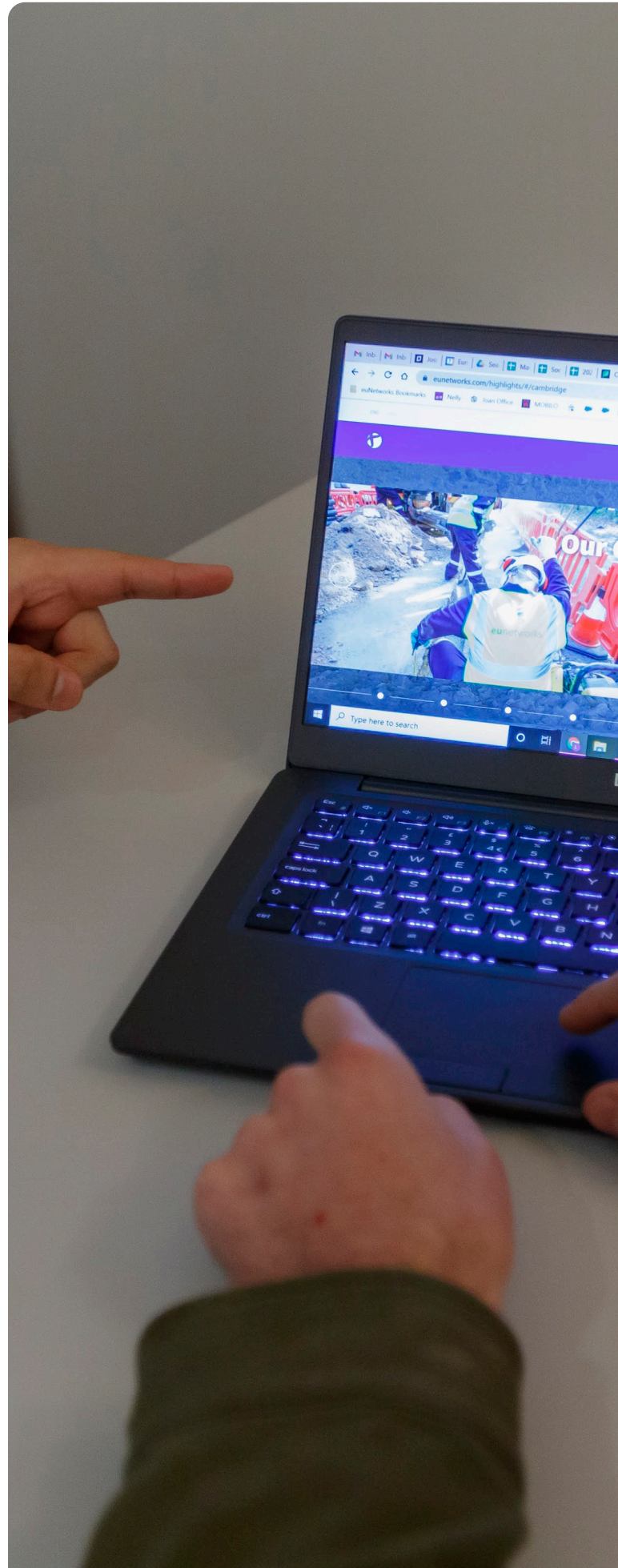
## Priya's story: A case study of employees thriving

Priya is one of euNetworks and LDN Apprenticeships partnership's great success stories. Things could have been very different, though. Priya, despite being extremely bright, had never felt academically confident, and this wasn't the only hurdle she faced. She wanted to pursue a career in technology and design, but her understanding was that women and people of colour can sometimes be made to feel unwelcome. Priya's resilience prevailed, however, and her search for a tech role led to LDN Apprenticeships. Her first placement was with euNetworks.

“ Interviewing for jobs can be really challenging. People are quick to make you feel like you don't belong... From my very first day I could tell that euNetworks was different. It was like a family. People made time for me and I felt welcome.

Priya started out in the Infrastructure and Investment department, before moving into Sales Engineering where she truly found her calling. She spends time designing network routes, which satisfies her creativity, and is learning new tech-skills daily. She has been able to chart her course for career progression, and she now supports new starters through their first year at euNetworks, through our buddy system too.

Key to the success of the partnership between LDN Apprenticeships and euNetworks is their shared ideology; that all young people, regardless of background, deserve opportunities and can bring value to an organisation. Aside from the hard work, energy and skills that team members like Priya bring, the presence of voices like hers strengthens the team and broadens its outlook.



# Mandatory and Voluntary Disclosures aligned with SASB

SASB TOPIC/ CODE	ACCOUNTING METRIC	DISCLOSURE
<b>Environmental footprint of hardware infrastructure</b>		
TC-TL-130a.1	<ol style="list-style-type: none"> <li>Total energy consumed</li> <li>Percentage grid electricity</li> <li>Percentage renewable</li> </ol>	<ol style="list-style-type: none"> <li>Total Gigajoules (GJ) consumed: 89,641.3 GJ.</li> <li>Percentage grid electricity: 49%.</li> <li>Percentage renewable: In 2021, euNetworks procured 51% of power (KWh) from renewable sources.</li> </ol>
<b>Data privacy</b>		
TC-TL-220a.1	Description of policies and practices relating to behavioural advertising and customer privacy	euNetworks operates an Information Security Management System (ISMS) framework and are internally and externally audited against ISO 27001:2013.
TC-TL-220a.2	Number of customers whose information is used for secondary purposes	N/A
TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	0
TC-TL-220a.4	<ol style="list-style-type: none"> <li>Number of law enforcement requests for customer information,</li> <li>Number of customers whose information was requested,</li> <li>Percentage resulting in disclosure</li> </ol>	None; euNetworks is not a consumer facing business.
<b>Data Security</b>		
TC-TL-230a.1	<ol style="list-style-type: none"> <li>Number of data breaches,</li> <li>Percentage involving personally identifiable information (PII),</li> <li>Number of customers affected</li> </ol>	None



Data Security		
TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	<ul style="list-style-type: none"> <li>• euNetworks operates an Information Security Management System (ISMS) framework and are internally and externally audited against ISO 27001:2013.</li> <li>• Data security has been identified as material issue and appropriate Risk management measures are in place and continually updated.</li> <li>• euNetworks tests the effectiveness of perimeter security controls to prevent and detect attacks (external penetration testing) annually.</li> <li>• euNetworks runs vulnerability scans on a scheduled basis.</li> <li>• euNetworks runs a Security Information Event Management (SIEM) platform to detect anomalies within the network. No significant data breaches experienced.</li> </ul>
Product end-of-life management		
TC-TL-440a.1	<ol style="list-style-type: none"> <li>1. Materials recovered through take back programs, percentage of recovered materials that were</li> <li>2. reused,</li> <li>3. recycled, and</li> <li>4. landfilled</li> </ol>	euNetworks' take back programs are being developed; current metrics are not material.
Competitive behavior & open internet		
TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations	None
TC-TL-520a.2	<p>Average actual sustained download speed of</p> <ol style="list-style-type: none"> <li>1. owned and commercially-associated content and</li> <li>2. non-associated content</li> </ol>	<p>euNetworks does not differentiate between the two types of content identified in the standard.</p> <p>euNetworks does not have visibility into the application layer of the Internet traffic and there is no mechanism in place to evaluate content of the traffic.</p>

## Competitive behavior &amp; open internet

TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating, and related practices	<p>For information on this topic, see euNetworks' Internet peering policy at <a href="https://peering.eunetworks.com/">https://peering.eunetworks.com/</a>.</p> <p>euNetworks' peering location details could be viewed on <a href="http://www.peeringdb.com">www.peeringdb.com</a>.</p> <p>In addition, euNetworks is a heavy user of route servers on commercial Internet exchanges that provide free Internet peering connectivity to its members.</p> <p>euNetworks' Internet network does not apply any content filters or rate limiting and all Internet traffic is treated alike.</p>
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## Managing systemic risks from technology disruptions

TC-TL-550a.1	<ol style="list-style-type: none"> <li>1. System average interruption frequency and</li> <li>2. Customer average interruption duration</li> </ol>	<ol style="list-style-type: none"> <li>1. Under evaluation for future reporting.</li> <li>2. euNetworks does not report on customer average interruption duration. Service Availability is a main metric used to measure performance, which is on average above industry standard.</li> </ol>
TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	<p>euNetworks is fully compliant and certified with the industry security standard ISO 27001.</p> <p>The objective for the Business Continuity Management is to enable euNetworks, its technical facilities and its employees to ensure that control of products and services are available at all times in compliance with all regulatory, legal, contractual and other requirements, as well as the operation of important IT services and euNetworks facilities.</p> <p>The aim is to maintain or, in the event of damage, perform the fastest possible restoration of the normal operation of critical or time-critical services at euNetworks.</p> <p>euNetworks Business Continuity Management captures the threats and risks that can impair time-critical processes, regulates process organisation, emergency and response measures, monitoring and improvement of the Business Continuity Management process within euNetworks.</p>

Sustainability Partners:



Maanch is a diverse award-winning, London-based B Corp providing integrated technology and advisory solutions to measure, manage and report ESG & Sustainability data.

Maanch worked with euNetworks to perform a comprehensive assessment of its impact touchpoints, material ESG risks and opportunities, and ambitions around sustainability.

Maanch have advised euNetworks in the development of strategies, policies, practices and KPIs to manage these risks and successfully take up opportunities, to achieve its ambitions, in the short and longer term.



Avieco, part of Accenture, helps companies to understand, manage and improve their sustainability performance, and create sustainable value for their stakeholders. Its expertise in sustainability consulting spans a broad range of industries including retail and consumer goods, financial services, technology and media.

Avieco calculated and restated elements of euNetworks' carbon footprint for Scopes 1, 2 and 3 and have also produced a Carbon Reduction Plan for euNetworks to manage their emissions.



Aeterra is a full-service environmental and sustainability consulting firm.

Aeterra conducted an Environmental Review of euNetworks to identify potential and known environmental liabilities related to:

1. environmental impact,
  2. regulatory compliance, and
  3. health and safety,
- as well as other environmental sustainability considerations related to the euNetworks business.

**Disclaimer:**

Maanch have been engaged by euNetworks to prepare this inaugural Sustainability Report.

The information and opinions in this report were prepared by euNetworks and its affiliates. euNetworks makes every effort to use reliable, comprehensive information, but Maanch makes no guarantee that it is accurate or complete. We have no obligation to tell when opinions or information in this report change. This report may contain forward-looking statements and there can be no guarantee that they will come to pass.

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For more information on euNetworks' data protection policy, please refer to <https://eunetworks.com/privacy-statement/>.

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