Continuing Progress

Advancing Towards a Positive Impact

PLANET, PEOPLE, PROSPERITY, AND PARTNERSHIPS

eunetworks

Sustainability Report 2023

PUBLIC

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Letter from our CEO

It is with great pride that I share with you the progress we have made on our sustainability journey since our first sustainability report. As we look back on the last year, we recognise the steps we have taken and the vision we are working towards. Over the past years, we have remained dedicated to our core values, and our commitment to sustainability has never been stronger. We understand the impact our operations can have on the environment, and we are committed to reducing our carbon footprint.

Our pledge to be net-zero carbon by 2040 is not just an aspiration but it is a driving force behind our actions. We have joined the Climate Pledge, demonstrating our unwavering commitment to combat climate change. Setting 1.5°C-aligned science-based targets across Scopes 1, 2, and 3 is a testament to our ambition to be leaders in environmental responsibility. We are dedicated to pioneering innovation in carbon measurement tools for service and project-based emissions, empowering our customers to measure and address Scope 3 emissions with precision, and helping suppliers to reduce their carbon footprint.. Our ultimate goal is to deliver the lowest carbon footprint per bit of data transmitted. It is a goal we take seriously that drives our daily efforts.

In the broader global context, we are just at the beginning of our sustainability journey. While the path to achieving net-zero emissions is not fully paved, especially in the telecom sector, our commitment is resolute.

At the heart of our values and mission lies a commitment to nurture our workforce. This commitment includes the task of building a diverse, fair, and inclusive workforce that empowers the varied communities within which we operate. Our approach to Diversity, Equity, and Inclusion (DE&I) revolves around our employees, emphasising the cultivation of an inclusive culture that recognises and appreciates the diversity in their backgrounds, viewpoints, and capabilities. We proactively endeavor to attract and bring on board exceptionally talented individuals who reflect users of the internet in the geographies in which we operate.. This emphasis on diversity extends across all levels of our company, from apprenticeships to senior leadership roles and our Board.

Our sustainability strategy encompasses long-term objectives, focusing on carbon neutrality, diverse, equitable, and inclusive workforce, responsible supply chain management, customer-driven innovation, and biodiversity conservation:

Net Zero:
We have set our sights on achieving net-zero carbon emissions by 2040. This ambitious target involves increasing our use of renewable energy sources, implementing innovative technologies, and adopting efficient operational practices to minimise environmental impact.

Diverse, Equitable, and Inclusive workforce:
We champion an inclusive culture that values the richness of our employees' backgrounds and perspectives. We prioritise building a diverse, equitable and inclusive culture, and our goal is to achieve gender balance in our workforce, positioning us as a preferred employer within the telecoms industry.

Responsible Supply Chain Management:
We are collaborating with our partners to establish responsible supply chain practices. This involves promoting transparency, ethical sourcing, and reducing our environmental footprint.

Customer-Focused Innovation:
We are committed to ongoing innovation, developing bandwidth infrastructure solutions that prioritise energy efficiency, emissions reduction, and circular economy principles. By working closely with our customers, we aim to drive positive change on a broader scale.

Biodiversity Preservation:
Our dedication extends to contributing to biodiversity conservation and ecosystem resilience. Our initiatives focus on promoting biodiversity awareness, protecting natural habitats and supporting reforestation efforts.

As we forge ahead, I want to express my deep gratitude to our internal teams, customers, and partners. Your dedication, commitment, and innovative spirit are what make euNetworks a true leader in our industry. Together, we are shaping a more sustainable, more responsible future for us all. Our journey continues, and I am eager to see the positive change we can create.

Thank you for being part of this remarkable journey.

Paula Cogan
Chief Executive Officer

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.

Journey to a Greener, Cleaner, & Inclusive World: Current Status and Future Paths

In 2022, we continued our commitment to long-term sustainable growth, minimising environmental impact, and positively impacting the communities we serve. We began by establishing Science-Based Targets in line with a 1.5°C scenario and made a commitment to the Climate Pledge, pledging to achieve net-zero carbon operations by 2040. By the end of 2022, we had reduced emissions by 38% across all scopes compared to 2021, a 53% reduction from our 2019 baseline. As part of this, we achieved our target of procuring materially all (98%) of our energy from renewable sources.

We have developed innovative, data-driven tools to support our ESG strategy and targets, and those of our customers. The Network Construction Carbon Calculator (NC3) evaluates project-level emissions, and the Carbon by Service Tool calculates service-based emissions, directly contributing to our customers' Scope 3 emissions tracking. In recognition of our commitment to pioneering climate change initiatives and alignment with Microsoft's Sustainability vision, we received the 'Showstopper of the Year: Strides in Sustainability' award at the Microsoft Supplier Prestige Awards in 2022. We also recently won the best 'Environmental, Social and Governance' initiative at the Global Carrier Awards in 2023.

In 2021, we solidified our dedication to sustainability by securing sustainability linked infrastructure financing, and in 2022 we exceeded our environmental target by procuring 98.8% of our electricity from renewable sources and achieved our gender diversity target with 26.3% of our workforce self-identifying as women.

Celebrating the 10th anniversary of our apprenticeship programme, we recognise the remarkable dedication of our talented apprentices, and our whole team who support them, to make this programme such a success. We are humbled by the way we have been able to impact our apprentices' careers and lives, with 19 of the 39 participants still part of our team, including 10 who have dedicated 5 years or more to euNetworks.

To maximise our impact, we collaborate closely with our suppliers to encourage sustainable practices throughout the supply chain. We emphasise the importance of responsible sourcing, reduced emissions in manufacturing of carbon intensive products like duct, cabling, cement, and aligning with our low-carbon objectives.

As we move forward, we will focus on enhancing our partnerships with suppliers to collectively drive operational improvements, integrating environmentally friendly solutions into network building and service delivery. Additionally, our commitment to investing in our people and advancing our DE&I agenda will remain at the forefront of our efforts, fostering an inclusive and equitable workplace. We will work closely with our customers to understand their unique needs and seek innovative, environmentally responsible solutions to meet those needs. Together, we are shaping a more sustainable and interconnected future.

Our progress is testament to the dedication of the amazing people at euNetworks who have truly taken our values to heart and live them every day. I thank each and every one of you for this.

Richard Taylor
General Counsel & Chief Corporate Officer

Achievements & Ambitions

euNetworks is committed to sustainable growth, minimising environmental impact, and positively contributing to communities. Our ESG agenda focuses on creating shared value across stakeholders, including customers, partners, investors, employees and communities. Our strategic approach targets areas where our business can exert meaningful influence, concentrating efforts on the most significant opportunities within the ESG framework.

The table below illustrates how our goals and accomplishments align with the Sustainable Development Goals (SDGs).

Planet

Driving environmental accountability
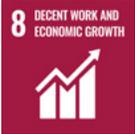
Ambition

Net Zero carbon commitment by 2040

Milestones	Achievements	
SBTi target: **46%** reduction across all 3 scopes by 2030 **55%** reduction of Microsoft specific emissions across all scopes by 2030 Conduct in-depth carbon analysis of our top 15 suppliers based on spend and develop a comprehensive decarbonisation roadmap	**KPIs** → Set 1.5°C-aligned science-based targets, validated by SBTi → Signed the Climate Pledge to be net-zero carbon across our businesses by 2040 → 38% reduction in Scope 1, 2, and 3 emissions compared to 2021, and a 53% reduction since the 2019 baseline → 98.8% renewable energy procurement for own needs → Reduced Scope 1 and 2 emissions substantially, with Scope 3 now comprising 98.5% of total emissions **Awards** → Winner 'Showstopper of the Year: Strides in Sustainability', Microsoft Supplier Prestige Awards 2022 → Winner 'Best Environmental, Social, Governmental (ESG) Initiative", Global Carrier Awards 2023 **Innovation** → Launched Carbon by Service Calculator, to quantify the carbon impact of euNetworks' products and services	7 AFFORDABLE AND CLEAN ENERGY 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 12 RESPONSIBLE CONSUMPTION AND PRODUCTION 13 CLIMATE ACTION 14 LIFE BELOW WATER 15 LIFE ON LAND

People

Nurturing employee well-being, diversity, equity and inclusion

Ambition

The people of euNetworks reflect the users of the Internet in the geographies in which we operate

Milestones	Achievements

Gender target:

30%

women in the workforce by 2026

KPIs

→ 44% of our Executive Leadership Team and 33% of our Board are women

→ 26.3% women in workforce as of December 2022

→ GDPR compliant, with ISO 27001 certified data security

→ 10th anniversary of the Apprenticeship Programme with 39 apprentices (2013-2022) and 19 still employed

→ Established 7 company-wide DE&I ambitions, focusing on people growth, community engagement, and talent pool development

→ Graduate Programme: 5 joiners in 2022

Initiatives

→ Implemented company-wide Mental Health & Wellbeing Programme, ensuring mental health support for all employees

→ Active "You Belong Here" employee-led working groups

→ Launched Accessibility Passport

Prosperity

Igniting sustainable growth

Ambition

Blend financial growth with ESG commitments

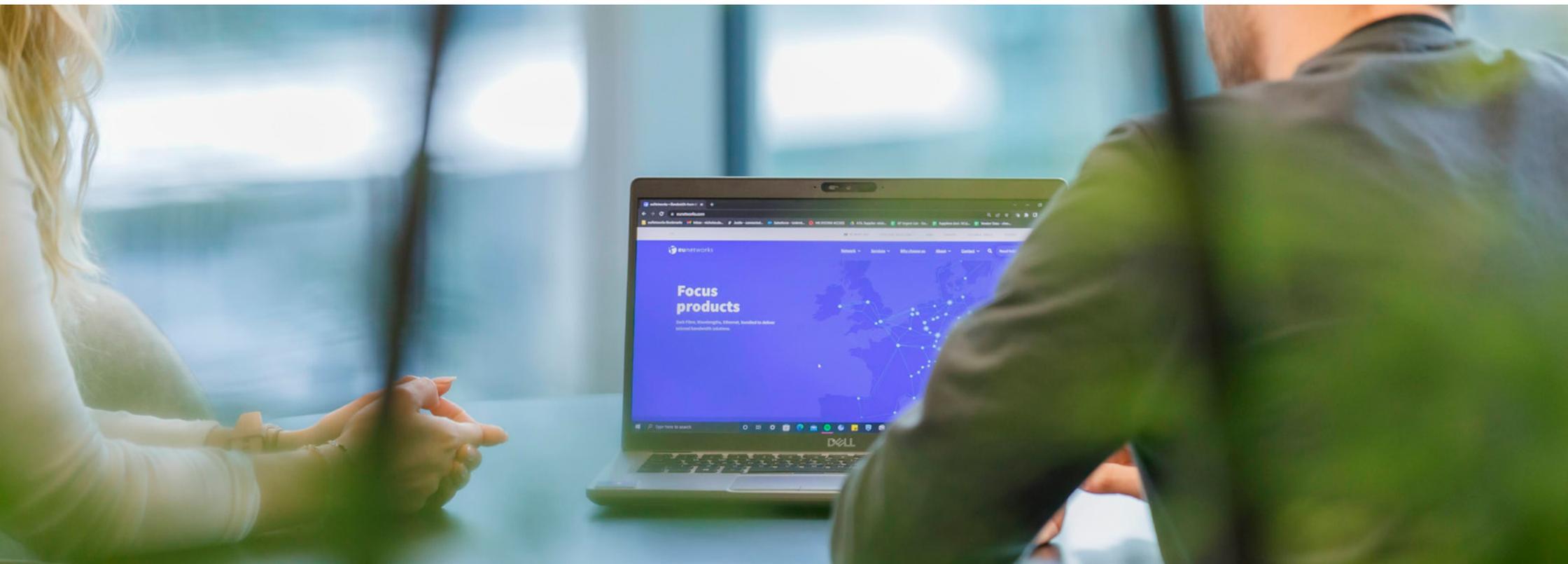| Milestones	Achievements	
Climate-related risks to be incorporated into financial statements Commercial vendor due diligence policies ongoing	**KPIs** → Established Sustainability Governance structure → Zero accident and safety-related fatalities recorded → CDP score 'B' ("Management") for 2021, indicating clear evidence of managing our environmental impact → Met both social and environmental KPIs of the Sustainability Linked Loan (SLL) as of December 2022 **Policies & Practices** → Sustainability Policy → Updated Global Health & Safety Policy → Updated Supplier Code of Conduct → Completed the UNGC SDG Accelerator to expedite progress toward achieving the SDGs by 2030	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 11 SUSTAINABLE CITIES AND COMMUNITIES 16 PEACE, JUSTICE AND STRONG INSTITUTIONS 17 PARTNERSHIPS FOR THE GOALS

Partnership

Cultivating responsible partnerships

Ambition

Sustainable collaborations, maximised impact

Milestones	Achievements	
Partnership with biodiversity NGO Integrate sustainability considerations into our RFP process	→ Group wide Volunteering Policy → Active employee involvement in community and charitable initiatives recorded → Supplier workshops, sharing sustainable construction best practices → Engagement with suppliers to drive carbon reduction initiatives → LDN Apprenticeships partnership since 2013, with 39 apprentices completing the programme	**11** SUSTAINABLE CITIES AND COMMUNITIES **12** RESPONSIBLE CONSUMPTION AND PRODUCTION **17** PARTNERSHIPS FOR THE GOALS

ESG Materiality Matrix

We prioritise responsible growth with a positive impact. Our sustainable business model addresses societal challenges, while meeting customer needs and delivering investor returns. Our materiality assessment helps to identify key environmental, social, and governance issues. Results are visualised below.

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,
Equity & Inclusion

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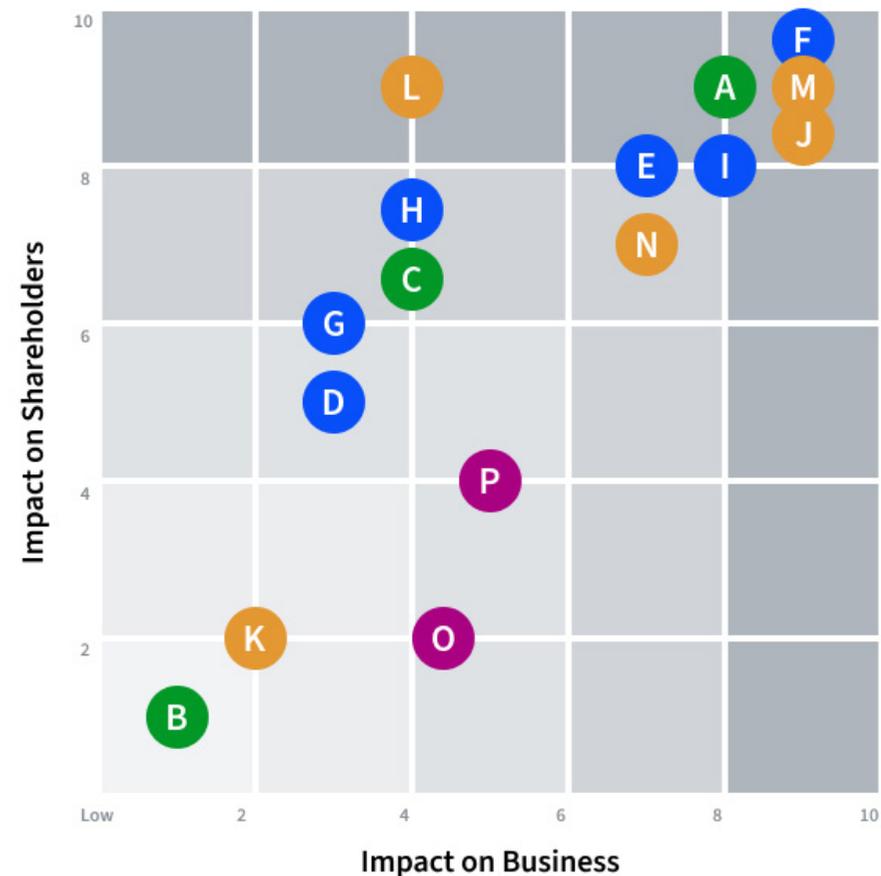
J. Supply Chain Management
K. Materials Sourcing & Efficiency
L. Physical Impacts of Climate Change
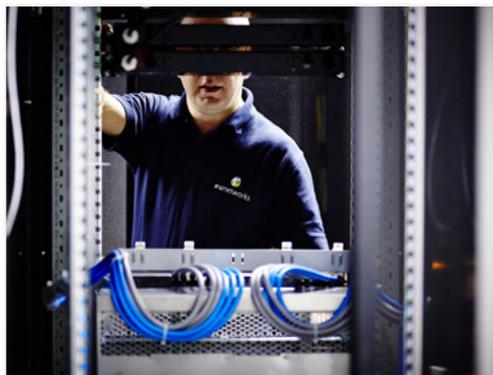M. Business Ethics
N. Systemic Risk Management

Partnership

O. Community Engagements
P. Branding and Reputation

Our strategic plans prioritise key areas that are highly relevant to our business and stakeholders.

1

Data Security:

Annual external penetration testing and scheduled vulnerability scans for perimeter security.

Deployment of a Security Information Event Management (SIEM) platform to detect network anomalies.

No significant data breaches in our history.

Business Ethics:

Comprehensive and longstanding Business Ethics Policy.

2

GHG Emissions:

Collaborate with suppliers to assess and improve their sustainability practices.

Automation of emission monitoring and reporting.

Form partnerships with suppliers, customers, and competitors committed to addressing climate change, contributing to collective efforts for a low-carbon future.

3

Employee Engagement, Diversity & Inclusion:

Focused efforts on gender gap reduction.

Initiatives: women on hiring panels, inclusive behaviours training, DE&I statements in job adverts.

Operational formal hybrid working policy company-wide.

4

Supply Chain Management:

We engage our strategic suppliers to integrate sustainability performance metrics into sourcing decisions. These evaluations encompass various ESG factors, including environmental management, circular economy practices, stakeholder engagement, and the supplier's management of its own supply chain.

* Building on the foundation of our previous materiality matrix in 2022, the updated matrix reflects developments in our business priorities, as targets are attained and as opportunities and risks change.

Planet

Overall Emissions Summary

	2022 Value (tCO₂e)	2021 Value (tCO₂e)	2022 to 2021	2019 Value (tCO₂e)	2022 to 2019
Scope 1	227*	17	1,235%	24	846%
Scope 2	357	3,812	-91%	4,191	-91%
Scope 3	37,385	57,538	-35%	75,922	-51%
Total	37,969	61,367	-38%	80,137	-53%

*one-off refrigerant top-up for one air conditioning unit resulted in 209tCO2e. This has led us to undertake a review of the air conditioning units in our colocation facilities.

Carbon Reduction

As one of the leading Western European providers of critical bandwidth infrastructure, we are doing our part to contribute to a more sustainable future. We are committed to addressing climate change - this aligns with our values, responds to the concerns of our stakeholders, and is beneficial for our planet.

We continue our progress toward our Science Based Target ambitions and Net Zero targets, having reduced emissions by 38% across Scopes 1, 2, and 3 at the end of 2022 compared to 2021, and by 53% compared the 2019 baseline.

These reductions in emissions last year were achieved mainly as a result of:

→ transition of **electricity** to **renewable sources,** reducing market-based energy by 91%, despite a 16% increase in consumption (Scope 2). We procured 100% of the electricity for our German colocation sites from renewable sources starting on January 1, 2022. By the end of the year, we procured materially all of our electricity from renewable sources. Moreover, the environmental KPI for the Sustainability Linked Loan (SLL) was set at 82% and was exceeded by achieving 98.8% of electricity procured from renewable sources;

→ further reductions in emissions associated with **Purchased Goods & Services** and **Capital Goods (Scope 3)**, largely driven by extensive supplier engagement resulting in an improvement in data quality. We made this progress by obtaining **product-specific life cycle assessments** and conducting a thorough analysis of the procurement ledger, resulting in reduced reliance on spend-based data;

→ decrease in Upstream Leased Assets as a result of our **data centre suppliers** continuing their **transition to renewable power**; and

→ no subsea cable laying or survey works being undertaken in 2022, resulting in zero Upstream Transportation and Distribution emissions.

Staff commuting emissions increased significantly as Covid restrictions eased and our teams returned to the office. Consequently, working from home emissions decreased. Business travel remained lower than our baseline year before the pandemic.

We are making good progress towards our emissions reduction goals, despite challenges in managing Scope 3 emissions. We recognise the need and importance to continue decarbonising our network and operations, and we are committed to working closely with our suppliers and customers to achieve this.

Case Study

Building Sustainable Super Highways with Reduced Carbon Impact

euNetworks invests in sustainable infrastructure with the development of Super Highways, long-haul fibre builds featuring high volumes of new dark fibre. This innovative fibre technology offers increased capacity and lower power consumption, achieving the lowest 'carbon per bit.' Encouraging customers to adopt these Super Highways helps them leverage products and services with higher energy efficiency, effectively reducing their own Scope 3 emissions.

Benefits: Increased capacity, lower power consumption, and higher efficiency.

Case Study

Sustainable Materials for Network Construction

euNetworks is actively exploring alternative materials, ranging from cables and plastic ducts to concrete, and exploring different construction techniques to reduce the carbon emissions during both the construction and operational stages of our network. We have explored alternative fuels for construction, as well as the use of electrical equipment, resulting in a substantial reduction in carbon emissions. Embracing alternative materials not only minimises waste but also fosters a circular economy.

Impact: Reduced carbon emissions and circular economy promotion.

SLL KPI Target:
98%
renewable energy for Scope 2 in 2023

Net Zero by
2040

SBTi target of
46%
reduction across all 3 scopes

Microsoft set target:
55%
reduction of Microsoft specific emissions across all scopes by 2030

Driving Innovation

Beyond standard sustainability reporting, we have developed two calculators to calculate carbon for construction projects and bandwidth solutions services. This allows customers to understand their greenhouse gas emissions linked to construction projects and products procured from euNetworks. These calculators follow the Greenhouse Gas (GHG) Protocol and allow customers to monitor their progress toward sustainability goals.

Network Carbon Construction Calculator (NC3)

In 2021, euNetworks launched the Network Carbon Construction Calculator (NC3) to assess the carbon impact of the stages of construction projects and provide transparency of the carbon emissions across the stages of construction. The tool enables us to estimate the incremental carbon impact of new network construction projects to identify the lifetime emissions cost of a project. We can use these numbers to identify main carbon hotspots and key drivers behind these emissions.

Our long-term aim is to use the outputs to iterate designs and engage with our suppliers to target emissions reductions.

Carbon by Service Calculator

In 2023, euNetworks introduced the Carbon by Service calculator, with the aim to quantify and evaluate the carbon impact from the various emission sources required to run euNetworks' services and deliver them to customers within a given time period. The tool focuses on the ongoing energy usage from the network and the additional equipment required to run it.

Customers are requesting that we disclose GHG emissions associated with the services and products they procure. These GHG emissions are part of customers' supply chain (Scope 3), which they themselves have to disclose and reduce. As such, it is important that we are able to quantify energy and GHG emissions at a product/service ltevel.

Case Study

Empowering Decarbonisation with IPC Systems

euNetworks actively engages with customers on strategies to minimise Scope 3 emissions. We worked with IPC Systems to understand the emissions resulting from our services to them. Together, we looked into innovative approaches to reduce carbon embedded in bandwidth solutions. Following this, IPC Systems has explored methods to obtain carbon data from their other suppliers, demonstrating the impacts of a collective effort toward sustainability.

"

IPC is devoted to sustainability. euNetworks' programmes and tools reflect a dedicated commitment to actively assessing and reducing carbon footprints. The clarity and effectiveness of their tool is evident. Their dedication to its ongoing enhancement strengthens the bond between our organisations.

- Jonathan Hogg
Senior Vice President, Chief Risk Officer & Transformation Manager, IPC Information Systems

Caring for Biodiversity

Biodiversity is more than just plants and animals. It embodies the complex interaction of diverse species: shaping ecosystems, providing essential nutrients, and influencing the environment. At euNetworks, we are dedicated to preserving biodiversity around our network. We carefully design routes, recognising the ecological impact of network construction. Whether building on land, in forestry areas, or the sea, we use different methods to ensure different species are preserved. This indicates the demonstration of our commitment to balancing technological progress with environmental stewardship.

Mitigating Biological Risks in UK Duct Build

During the completion of a 2x110mm duct build in the UK, euNetworks encountered various species.

Challenges Faced:

Encountering species: Badgers, birds, reptiles, and invasive non-native species like Japanese Knotweed and Cotoneaster plants.

Ecological risk: The invasion of species like Japanese Knotweed, changing habitual structure and changing the carbon distribution across the habitat.

Hydrological Pollution Risk: Proximity to a canal posing risks compounded by regional industrialisation causing water quality degradation.

Solutions Adopted:

Tailored conservation: Preserving native species and their habitats (e.g. trimming grassland and hedgerows preserved hedgehogs, while ecological surveys protected badger setts and bird nests).

Comprehensive management: Specific mitigation and adaptation strategies created for each species and its impact.

Case Study

Bee Conservation Initiative

Bees play a vital role as an indicator species, reflecting the health of ecosystems. Crucial for over 70% of the country's food production, bumblebees in Ireland face a concerning decline. According to the National Biodiversity Centre, without intervention, 90% of bumblebees may vanish by 2050.

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

This initiative, garnering industry support, focuses on conservation efforts. euNetworks actively backs the "Orchards in the Community" initiative, contributing to the planting of over 1,000 mixed fruit orchards throughout Ireland in 2022.

"

With 70% of food crops dependant on pollinators, the protection of bee habitats is crucial to maintain food resources.

- Garry Connolly
Founder of Host in Ireland

People

Diversity, Equity and Inclusion (DE&I)

Strengthening a diverse, equitable, and inclusive workforce is integral to empowering the diverse communities where we operate. Our DE&I approach centres on our employees, championing an inclusive culture that values and celebrates the richness of their backgrounds and abilities. We actively seek to recruit and hire talented individuals who reflect the world in which we live, placing emphasis across all levels from apprenticeships to senior leadership roles.

In the past couple of years, we've made significant strides in integrating DE&I into the core fabric of euNetworks. A major development is the inclusion of a mandatory DE&I-linked objective for all people managers within our formal performance management process. This strategic move ensures that individual managers are more focused on contributing to our overall business objectives and understanding their impactful role.

Another achievement is the establishment of 7 company-wide DE&I ambitions. These ambitions revolve around people growth, community engagement, and talent pool development, and have been implemented across our departments.

Advancing Meaningful Change

→ 44% of our Executive Leadership team are women, including our CEO and President.

→ A target to achieve 30% women representation in our workforce by 2026.

→ Company-wide training sessions focusing on inclusive behaviour.

→ Integration of DE&I objectives into the roles of people managers.

→ Enhanced policies, such as a family-friendly policy offering inclusive parental benefits and the Accessibility Passport catering to neurodivergent workplace needs.

→ Revamped recruitment processes with increased diversity on hiring panels, DE&I statements in job adverts, and the discontinuation of referral fees.

→ Active support for the Women in Tech Forum and the establishment of Empowering Women at euNetworks.

You Belong Here

At euNetworks, diversity, equity, and inclusion are foundational to our operating principles.

To fortify these efforts, we introduced 'You Belong Here,' an employee-led DE&I group collaborating with our HR team to effect meaningful changes for individuals in our communities.

The core values of our business are truly on display in allowing us to be who we are, providing equal opportunity for all people regardless of where they work in the business and regardless of sexual orientation or gender identity.

You Belong Here

1

Rainbow Group

- Focused on LGBTQ+ representation & awareness.
- Creating and promoting internal social events, national events & awareness campaigns.

2

Enablement Group

- Making euNetworks accessible and welcoming for people of all physical, mental and learning abilities.
- Collaborating with the business to enhance accessibility policies and initiatives.

3

Generational Collaboration

- Bridging the gap between our cross-generational workforce to collaborate and innovate.
- Expanding the group to ensure representation of every generation, developing initiatives that share new and different ideas and skills.

4

Celebrations Group

- Drive awareness of relevant cultural, religious and social events to the euNetworks community.
- Currently delivering on a timetable of events for 2023.

5

Breaking Bias

- Breaking down stereotypes and biases for a more inclusive and harmonious working culture.
- Developing tools for the euNetworks community to identify unconscious bias.

6

Empowering Women at euNetworks

- Fostering a network group for women at euNetworks, within the telecom industry and beyond.
- Engaging with remote offices, employees and events for insights.

7

Engagement Group

- To ensure that 'You Belong Here' effectively engages with the wider euNetworks community.
- Delivering internal 'You Belong Here' communications to the rest of euNetworks.
- Supporting the company-wide DE&I ambitions & objectives.

8

Representation Matters

- Develop a more inclusive culture by enabling visibility & support for those in remote locations & different minority groups.
- Reaching out to remote offices & employees to bring insight.

> "
> Being part of the Rainbow Group is hugely important to me. It allows me to share my journey with those starting theirs. I can be my true self, feel valued and accepted in the workplace. It alleviates all my fears and gives me the courage to promote diversity and inclusion.
>
> **- Catherine**

Attracting and Retaining Talent

Our employee success goes hand in hand with the success of our company. We actively invest in skills development programmes for our employees at every stage of their careers. These initiatives are crafted not only to enhance performance in current roles but also to align with and support their future career aspirations.

Graduate Programme

Initiated in 2015, euNetworks takes pride in its structured graduate programme, serving as an excellent entry point for talent in the telecoms industry. With support from various business teams, our programme offers extensive opportunities for emerging talent to learn, grow, and demonstrate their skills, contributing to broader business outcomes. It serves as a platform for graduates to make a difference in our business, aligning with euNetworks' encouragement for employees to make a meaningful impact.

Empowering Women at euNetworks

We are actively working towards our social KPI through initiatives such as supporting the Women in Tech Forum, as well as establishing 'Empowering Women at euNetworks'. We have women occupying senior leadership positions, with 44% of our leadership team and 33% of our board members being women, showing great progress toward our goal.

Accessibility Passport

The Accessibility Passport is a live document unique to any euNetworks employee that requests it. It contains any changes and adjustments to the workplace that euNetworks has agreed to implement to make that employee's working environment better suited to any disability or specific working condition.

Social KPI

In addition to our environmental performance target, our funding is linked to a social indicator for gender diversity in the workplace. In 2022, we met the target with 26.3% of our workforce self-identifying as women. We expect to maintain the same level for 2023 and continue to work toward our objective of 30% by 2026.

Case Study

Building Connections Through Celebrations

When the Class of 2022 graduates joined euNetworks, they were entrusted with a unique responsibility - the Celebrations Group. This gave them the chance to collaborate, and contribute to the broader social fabric of the company. Their mission: To honour cultural, religious, and international holidays and celebrations, becoming the heartbeat that connects people across the network.

"

The Celebrations Group made me realise and appreciate all the work that happens behind the scenes in organising an event and being as inclusive as possible when celebrating different cultural festivities.

- Alexia

Mental Health and Wellbeing

Commitment

euNetworks fosters a mentally healthy workplace, recognising a healthy workspace as foundational for all.

Actions Taken

Training: 6 hours of mental health awareness training for new joiners.
Support Tools: Introduction of the 'Neurequity' portal - a dedicated resource for mental health and wellbeing.

Results

Enhanced support system for employees, with tools and training to navigate and understand mental health triggers and behaviours.

Highlight: Neurequity Portal

A step forward in euNetworks' dedication to mental health, it offers content on brain science and psychology, enriching understanding of emotional experiences.

Case Study

Promoting a Healthy Working Environment through Neurequity

In our ongoing commitment to provide unwavering support to our employees, euNetworks has introduced Neurequity, a new portal dedicated to workplace mental health and wellbeing education. This portal is accessible to all employees, serving as a valuable resource for learning and obtaining information on mental health and wellbeing.

Neurequity hosts a variety of content designed to offer deeper insights into the science and psychology of the brain, trigger points, and the causes of different behaviours. It provides valuable educational content, helping us understand the reasons behind our emotional experiences and empowering us to promote a healthy working environment.

Data Security, Customer Privacy and Business Continuity

Commitment

Uphold the highest standards of data security and ensure seamless business operations.

Actions Taken

ISO Compliance: Consistent adherence to ISO 27001 standards, with regular internal and external audits.
Robust Framework: Business impact evaluations, crisis management, recovery plans, and safeguarding measures against cyber threats.
Certifications: Addition of Amsterdam data centre to ISO 27001 certification in March 2023.
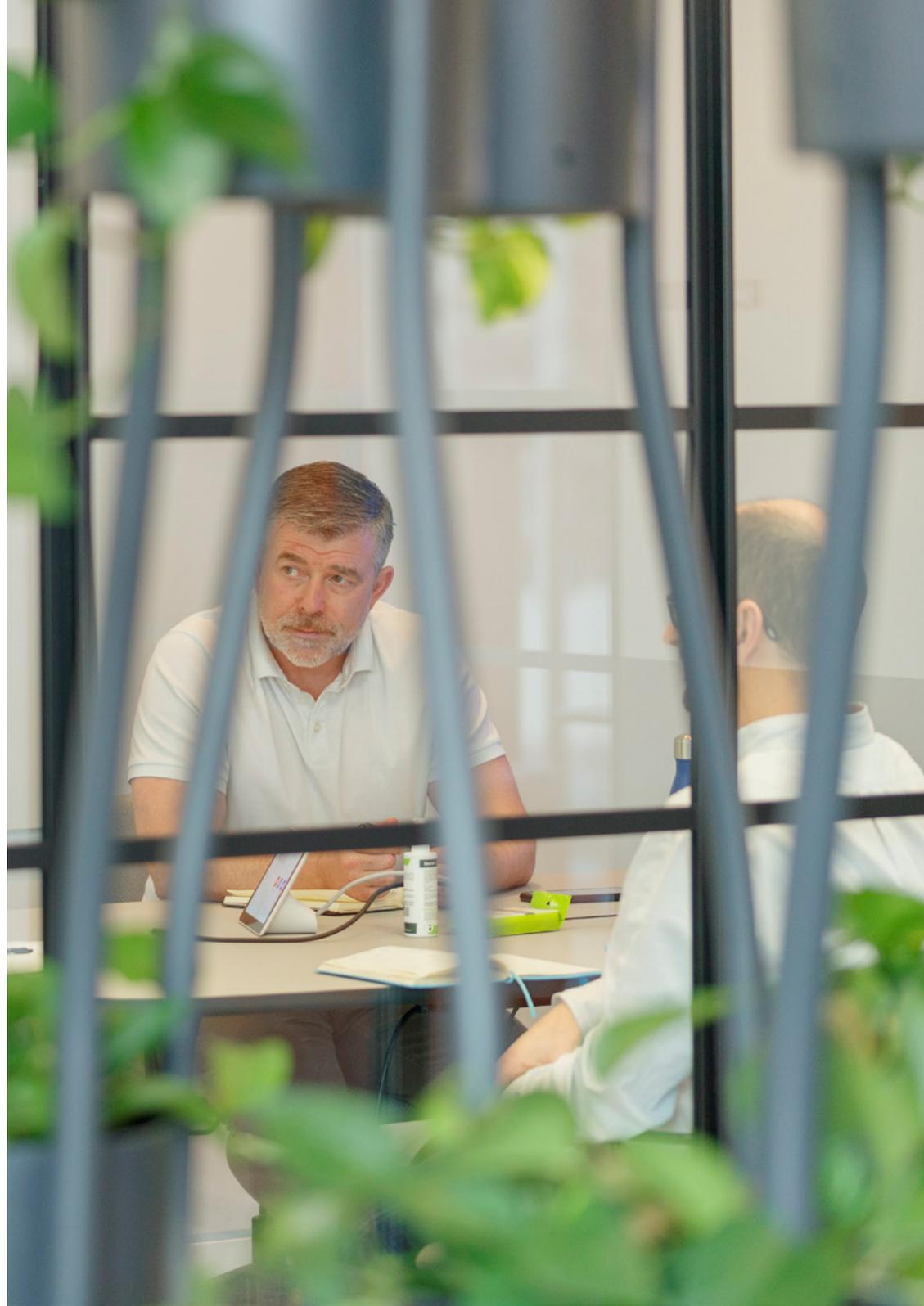
Results

euNetworks ensures the safety of partner, customer, and internal data with zero significant data breaches recorded.

Prosperity

Leadership and Governance and Commitments

euNetworks remains determined to integrate sustainability into its business growth. Driven by strong leadership and robust governance, our strategies drive sustainability forward, and enhance socio-economic benefits for all of our stakeholders.

Governance

At euNetworks, sustainability leadership is not an afterthought, it is integral to our business. The Board Sustainability Committee, made up of two non-executive directors and the CEO are at the forefront of what we do. They meet regularly, shaping our stance on addressing climate change issues and mapping our sustainability strategy.

In tandem, the Sustainability Steering Committee brings our green vision to life. This team operates across our business, effectively implementing our sustainability initiatives in line with our broader objectives.

Modern Slavery Prevention

Our commitment to ending slavery, human trafficking, and forced labour is outlined in our Slavery and Human Trafficking Statement. Aligned with our sustainability policy, this confirms our dedication to treating stakeholders in an ethical manner.

Global Health and Safety Policy

We have implemented a Global Health and Safety Policy which aims to:
- Strengthen management support for health and safety initiatives
- Improve project health and safety planning, and
- Develop a comprehensive global health and safety management framework.

Case Study

Driving Sustainability Through Policy Implementation

To address environmental challenges and further advance its ESG agenda, euNetworks has introduced a sustainability policy. This policy underscores our commitment to adopting sustainable practices and progressively reducing our environmental impact. We are also actively encouraging our customers, vendors, and suppliers to embrace similar sustainable practices.

To ensure the comprehensive implementation of the Sustainability Policy, the Board has entrusted the Sustainability Committee with the responsibility of overseeing the policy. This committee is dedicated to aligning the policy with ethical and legal obligations, ensuring that all stakeholders are in compliance. The pivotal role of implementing the policy and monitoring its effectiveness falls under the responsibility of the Sustainability Steering Committee. This dual-committee approach emphasises our commitment to driving sustainability throughout our operations and engaging stakeholders in this collective responsibility.

Board Structure

10 members on our Board of Directors	**6** average Board tenure in years
3 women Board members	**4** number of Board meetings held in 2022

Innovation-led Growth, Disclosures and Alliances

CDP Reporting

In 2021, euNetworks disclosed its inaugural CDP response, establishing 2019 as the baseline year and receiving a 'D' score (starting point, "Disclosure"). Subsequently, for the operating year 2021, the company reported again, achieving a significantly improved 'B' score ("Management"). euNetworks remains committed to ongoing CDP reporting, utilising it as a platform to communicate accomplishments in climate actions, particularly in greenhouse gas emissions, energy consumption, and supply-chain driven emissions.

The UN Global Compact

euNetworks aligns with the UN Global Compact, the world's largest corporate sustainability initiative, reflecting our commitment to a principles-based approach in areas like human rights, labour, environment, and anti-corruption. As a signatory, our ESG strategy actively incorporates the Compact's Ten Principles, and we extend our commitment by engaging in projects aligned with the Sustainable Development Goals (SDGs). This holistic approach underscores our recognition of the interconnected nature of global challenges. Additionally, we've joined the SDG Accelerator to expedite progress toward achieving the SDGs by 2030.

SME Climate Hub

euNetworks, as part of its commitment to sustainability, joined the SME Climate Hub on February 16, 2022. This platform empowers small and medium-sized businesses by offering a streamlined process to make internationally recognised climate commitments. By signing the SME Climate Commitment, euNetworks pledges to:

- halve greenhouse gas emissions before 2030,
- achieve net-zero emissions before 2050, and
- disclose progress annually.

This initiative aligns with the United Nations' Race to Zero campaign and provides valuable tools and resources for businesses to reduce their environmental impact and enhance resilience.

Enabling Growth through Sustainable Funding

In December 2021, euNetworks completed the refinancing of existing indebtedness as well as raising significant undrawn, committed debt facilities (together the Sustainability Linked Loan, or SLL) to fund the construction and development of the next generation of critical bandwidth infrastructure in Europe. This long-term infrastructure financing solution provides total debt facilities of €760 million. The SLL is sustainability-linked, focused on key social and environmental performance targets that reflect euNetworks' ESG agenda.

The SLL contains two sustainability targets based on an Environmental Sustainability Benchmark and a Social Sustainability Benchmark. Meeting each target contributes to a margin adjustment to the rate of interest paid under the SLL: downwards adjustments to the interest rate paid for meeting the Environmental Target and Social Target, an upwards adjustment to the interest rate paid for falling below the Baseline score for the Social Sustainability Benchmark and no adjustment to the interest paid for delivering between the Baseline score and the Target score.

The benchmarks are calculated as follows:
- Environmental Sustainability Benchmark for the years ending 31 December 2022 and 2023: to procure a certain percentage of electricity from renewable sources. For each subsequent year, to reduce greenhouse gas emissions against our 2019 baseline with targets to be approved by euNetworks' Board of Directors. We are currently completing an exercise to set these targets.
- Social Target: Social Sustainability Benchmark the proportion of employees as of 31 December in each year who identify as women, expressed as a percentage of the total employees who identify as women or men.

Key achievements

→ Environmental Sustainability Benchmark Target exceeded in 2022 as a result of strategic initiatives, including transitioning all German colocation sites to 100% renewable power through a power purchase agreement (effective from January 1 2022) and extending the shift to renewable electricity across our offices, Inline Amplifiers (ILAs), and cable landing stations.

→ Social Sustainability Benchmark Target met with 92 of our workforce self-identifying as women out of a total number of men and women of 349.

Looking ahead, the focus is on maintaining our performance against these benchmarks and driving initiatives that reinforce our environmental and social targets.

Year	Environmental Sustainability Benchmark		Social Sustainability Benchmark		
	Target Score	Performance	Baseline Score	Target Score	Performance
2022	≥ 82%	98.8%	≥ 25.3%	≥ 26.3%	26.3%
2023	≥ 98%		≥ 26.3%	≥ 27.2%	
2024	To be set		≥ 27.2%	≥ 28.1%	
2025	To be set		≥ 28.1%	≥ 29.1%	
2026	To be set		≥ 29.1%	≥ 30.0%	
2027	To be set		≥ 30.0%	≥ 30.9%	
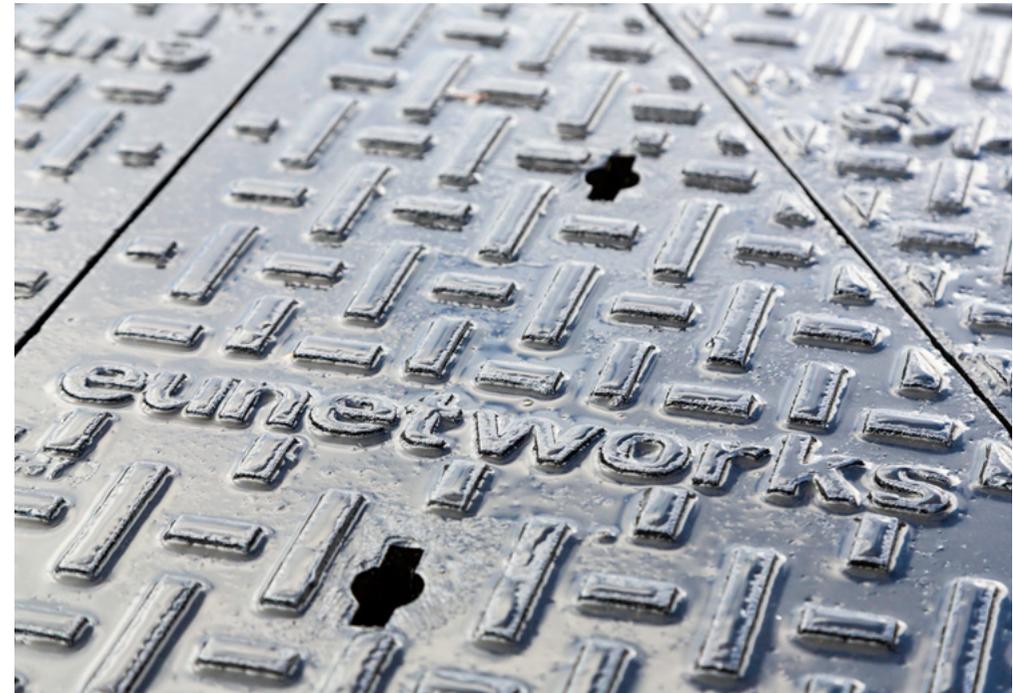
Supplier Collaboration for Sustainable Practices

Supplier Code of Conduct

euNetworks are deeply committed to enacting a lasting positive change on society and the environment. To ensure that our business operations reflect this commitment, we have implemented a robust Supplier Code of Conduct. This would align our suppliers with our commitment to ethical and sustainable operations. Moreover, it offers a framework to jointly decarbonise operations, advancing towards a low-carbon future.

Engagement with Suppliers

By integrating our operations with suppliers, we procure materials and equipment that are not only high in quality but also have a reduced carbon footprint, highlighting our stride towards mitigating climate change.

Engagement with Contractors/Field Operations

Partnering with a sustainable construction leader in the Netherlands, we have rolled out educational sessions for our field operations across Western Europe. These meetings are combined with site visits, which showcases eco-friendly material options and construction methodologies. This would promote sustainable logistics and circular economy initiatives when constructing new networks.

Innovation: Reducing Emissions in Subsea Operations

Emissions arising from subsea cabling projects are attributed from the operational needs of crewed survey vessels, demanding significant amounts of power and fuel.

We opted for an Uncrewed Surface Vessel (USV) remotely controlled from the shore, over conventional methods for a 6-day survey. Use of the USV significantly mitigated our carbon footprint in comparison to the traditional crewed vessel approach. The carbon intensity was more than 20 times lower than the traditional approach.

Case Study

Deploying Sustainable Fibre Optics to Build Greener Networks

Our commitment to sustainability extends to the very core of our infrastructure. Partnering with a global supplier, we have embraced an environmentally friendly fiber optic cable with unique features:

1. Carbon Footprint Transparency:
Our chosen cables come with a calculated carbon footprint, adhering to a "cradle-to-gate" approach. This ensures that environmental impact is assessed throughout the entire lifecycle of the cable, from production to deployment.

2. Health and Environmental Safety:
The cables are crafted without substances that pose risks to health or the environment. They are free from hazardous materials, aligning with our commitment to providing safe and sustainable solutions.

3. Recyclability at its Core:
Materials used in these cables are chosen with an eye on recyclability. Whether the cables themselves or their components, the emphasis is on creating products that can be fully recycled, contributing to a circular economy.

4. Incorporation of Recycled Material:
As part of our sustainability initiative, these cables include recycled materials, further reducing our environmental footprint and supporting the repurposing of resources.

5. Enhanced Transmission Efficiency:
Our selected cables boast high transmission efficiency, ensuring optimal performance and reducing energy consumption, aligning with our focus on efficient and eco-friendly solutions.

This partnership forms a crucial component of our decarbonisation plan, not only for our own operations but also in the networks we construct for our valued customers. By adopting cables that adhere to circular economy principles, we aim to contribute to a future that is sustainable and environmentally conscious.

Partnerships

Strategic Community Partnerships

Meaningful Employee Engagement

Our team actively engages with communities, driving positive changes by supporting biodiversity, helping underprivileged children, and providing career guidance. Our employees go above and beyond their official roles, engaging sincerely with communities, amplifying our societal impact.

LDN Apprenticeships: A Decade of Empowerment

We are celebrating the transformative journey of our apprenticeship programme, which has equipped numerous individuals with essential skills.

Since 2013, 39 apprentices have joined us, with most securing permanent positions. Ten of them have shown unwavering dedication for nearly 5 years. The apprenticeship programme has become integral to our organisational culture, bringing our values to life.

Despite challenges posed by the pandemic, our commitment remained. In 2022, we doubled-down, welcoming five new apprentices, with plans to include 3 more in 2023.

Our internal teams have played a crucial role, not just participating in the programme, but also by offering significant support and mentorship, shaping future careers and lives.

Apprenticeships at a glance 2013-2023	
Number of enrolled apprentices (1)	36
Post-apprenticeship careers or further/higher education (2)	96.7%
Apprentices who stayed at euNetworks (3)	89.7%
Apprentices who are aged between 16-25	92.3%
Apprentices who are women	33.3%
Apprentices who came from an ethnic minority background(4)	56.4%
Apprentices with neurodiversity challenges	20.0%
Apprentices with SEND (5)	5.1%
Apprentices who came from areas of low socio-economic status	28.2%

1 Includes 6 apprentices currently in the programme.

2 Either getting a job after the apprenticeship or going into further/higher education

3 Percentage of apprentices who stayed at euNetworks post their apprenticeship programme.

4 Classification of apprentices who are not from a white British, white Irish or any other white background.

5 Special Educational Needs and Disabilities.

"

At the heart of LDN Apprenticeships' mission lies the core belief in creating opportunities for diverse talent to realise their full potential. Over the past decade, our partnership with euNetworks has been instrumental in bringing this vision to life. Since our collaboration began, the apprenticeship programme has grown and matured, evolving into a thriving platform for nurturing talent. This transformation was made possible through various key factors, notably the unwavering dedication and commitment of euNetworks' internal teams who provide crucial support and mentorship to our apprentices. Within euNetworks, apprentices experience a unique blend of guidance, freedom, and accountability in a rapidly evolving business environment. With over three dozen apprentices having passed through the euNetworks programme, the majority have seamlessly transitioned into permanent positions upon programme completion. This unquestionably defines our success.

The alignment of missions and values between euNetworks and LDN is crystal clear, both deeply committed to nurturing talent and investing in the youth of today. The guidance and insights from the euNetworks Leadership Team have played an important role in shaping our journey; Richard Taylor, euNetworks General Counsel and Chair of the LDN Board of Directors, has not only helped shape LDN Apprenticeships' strategy but has also stayed true to our core purpose, positively impacting the lives of numerous young individuals.

Our remarkable partnership stands as a testament to euNetworks' unwavering commitment to forging a more equitable and just society. With a shared vision, we enthusiastically look forward to building upon this success in the years ahead.

- Simon Bozzoli
CEO LDN Apprenticeships

Case Study

Farhana's Journey to Professional Growth

Amidst the challenges posed by the Covid pandemic, Farhana, a stay-at-home mom with two children, found herself wanting to return to work. Whilst searching the job market, she discovered that apprenticeships were not solely designed for individuals leaving formal education but also served as a valuable pathway for adults seeking to transition back into the workforce.

'Looking at apprenticeships was a fantastic starting point to transition back to work, and via some internet searches, I found LDN Apprenticeships. I gave a list of my interests and searched for opportunities, and euNetworks stood out for me.'

With a background in architecture, Farhana's apprenticeship at euNetworks aligned with her existing knowledge of fibre optics. The company tailored a Geographical Information Systems (GIS) role for her, allowing her to expand her skill set. Despite initial uncertainties about balancing employment with a day of study, Farhana received full support from her team and manager, enabling her to manage these responsibilities and enhance her skills in the role.

'Without the apprenticeship I do not think I would have ever considered entering the world of fibre and all it has to offer. I have learnt a great deal from an amazing team within a company so supportive and the apprenticeship has been one of the best things I have done for my career.'

Having successfully completed her apprenticeship, Farhana has secured a full-time role as a GIS specialist. She has become an integral part of our business, contributing significantly to designing routes for new builds and enhancing stakeholder engagement.

Key Highlights:
Triumph Over Adversity: Farhana's story is a resemblance of resilience, transitioning from a stay-at-home mum during a pandemic to a pivotal role at euNetworks.
Tailored Development: Her apprenticeship aligned with her architectural background, saw her flourish in a GIS role, a testament to our adaptive training programmes.
Reflecting Positivity: Today, Farhana is not just an employee; she epitomises the success of our apprenticeship programme, significantly shaping routes for new builds and fortifying stakeholder relations.

Young Enterprise

In an effort to empower young talent, euNetworks has forged a partnership with Young Enterprise, a UK-based organisation dedicated to enhancing students' essential employability skills, including CV writing and interview techniques. Our commitment involves fundraising initiatives and active volunteering, with euNetworks employees mentoring students.

In 2022, we elevated our engagement by establishing a corporate partnership. This programme encourages students to develop business ideas or products, with euNetworks volunteers offering valuable guidance and support. Our ongoing collaboration aims to attract more students to the STEM sector, providing them with insights and opportunities within the telecoms industry.

Host In Ireland

To elevate and uphold the ecological well-being of Ireland, euNetworks has actively supported Host In Ireland's initiative called 'DC for Bees.' By planting over 2000 mixed fruit orchards in various locations, we contribute to creating vital green spaces in urban areas, fostering crucial habitats for diverse species. This effort is crucial for bees, vital pollinators essential for sustaining ecosystems and supporting more than 70% of Ireland's food production.

Unfortunately, with the current decline, there's a high threat of a 90% reduction in bumblebee populations by 2050. Through our collaboration with Host In Ireland, we aim to address this challenge by creating orchards that not only offer a sanctuary for bees but also contribute to the preservation of their species and the enrichment of surrounding ecosystems.

KidsOut

KidsOut is an organisation dedicated to providing positive experiences for disadvantaged children, helping shape them into future contributors to society and the workforce. Focused on bringing joy to kids who have experienced domestic abuse, euNetworks have partnered with Ciena, actively to support this cause through volunteering.

One volunteering opportunity involved a trolley dash, during which we collected toys at a toy fair and donated them to KidsOut. These donated toys were then delivered to children in refuge, aiming to offer them items they may not have had before and bring some happiness into their lives.

EMC Munich

euNetworks has joined forces with EMC Munich in the Racks4Roots initiative, contributing to tree planting efforts in the Bavarian forest. In 2022, 42 companies collaborated with Racks4Roots to plant over 11,700 trees. Our Munich team actively supported this cause by committing to the planting of a specified number of trees in the forest.

Case Study

Impactful Volunteering

As an organisation, we recognise the valuable input charities and community organisations get from volunteers; we are committed to making a difference in the communities in which we operate. With this in mind we have recently launched a volunteering policy.

The policy gives our people the opportunity to support registered charities or local community initiatives. We recognise the significant benefits, not only to charities and local communities, but also the personal rewards for volunteers.

The policy gives all employees regardless of location the opportunity to take up to 3 days per year in volunteer leave. We have partnered with charities in the UK, Ireland & Germany. Our vision is to ensure that we have charity partners in all the countries that we operate in.

We are currently partnered with charities such as the Southeast Rivers Trust and KidsOut, as well as other institutions such as Young Enterprise, Host in Ireland and EMC Munich.
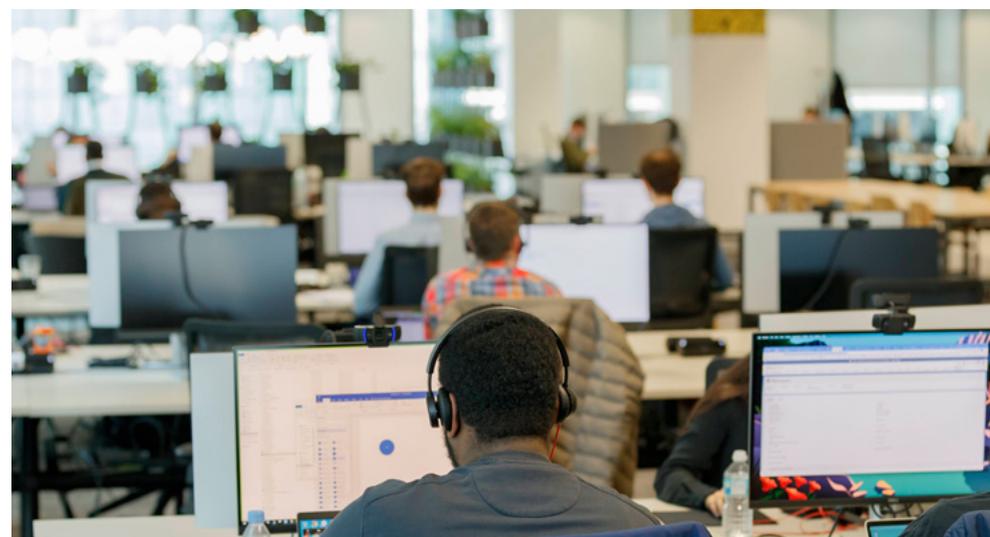
Appendix

Appendix 1: 2022 Emissions Summary

Scope	Emissions Source	2022 Value (tCO2e)	2021 Value (tCO2e)	Change from 2021 (%)	2019 Value (tCO2e)	Change from 2019 (%)
1	Natural Gas	0	4	-100%	11	-100%
1	Company Cars	11	11	0%	13	-15%
1	"Other" Fuels	7	2	+250%	Not Reported	N/A
1	Refrigerants	209	0	N/A	Not Reported	N/A
2	Electricity (Market-Based)	357	3,812	-91%	4,191	-91%
2	Electricity (Location-Based)	11,223	8,833	+27%	13,104	-14%
3	Purchased Goods & Services	31,072	39,093	-21%	48,987	-37%
3	Capital Goods	1,768	8,556	-79%	13,206	-87%
3	Fuel & Energy related activities	2,540	2,718	-7%	2,530	-0%
3	Waste	20	20	0%	10	+100%
3	Upstream Transportation & Distribution	0	4,509	-100%	2,132	-100%
3	Business Travel	14.5	1	+1,350%	946	-98%
3	Employee Commute	235	7	+3,257%	184	+28%
3	Working from Home	108	238	-55%	Not Reported	N/A
3	Upstream Leased Assets	1,578	2,328	-32%	7,905	-80%
3	Use of Sold Products	48	68	-29%	21	+129%
3	Water	1	1	0%	1	0%
Total		37,969	61,367	-38%	80,137	-53%

Appendix 2: Sustainability KPI Tracker

Sustainability Indicators	Topics	Metric	2022	2021	Change over 2021 (%)	2019*	Change over 2019 (%)
Finance	Finance	Revenue	€M	214.8	193.8	10.8%	167.6	28.2%
		Book Value of Equity	€M	728.0	702.0	3.7%	850.0	-14.4%
		Book Value of Debt	€M	660.5	608.8	8.5%	503.3	31.2%
	Sustainability Linked Loan	Environmental KPI - 82% renewable energy by Year End 2022	%	82.0	N/A	N/A	N/A	N/A
		Social KPI - 26.3% of workforce to be female by Year End 2022	%	26.3	N/A	N/A	N/A	N/A
Greenhouse Gas Emissions	GHG Emissions	Scope 1 Emissions	tCO2e	227.0	16.7	1259.3%	24.0	845.8%
		Scope 2 Emissions - Market Based	tCO2e	357.0	3,812.0	-90.6%	4,191.0	-91.5%
		Scope 2 Emissions - Location Based	tCO2e	11,223.0	8,833.0	27.1%	12,275.0	-8.6%
		Scope 3 Emissions	tCO2e	37,385.0	57,538.0	-35.0%	75,922.0	-50.8%
		Total Emissions	tCO2e	37,969.0	61,366.7	-38.1%	80,137.0	-52.6%
	GHG Intensity	GHG Intensity - revenue	tCO2e/ €M	176.8	316.6	-44.2%	478.1	-63.0%
		GHG Intensity - (Total Emissions / (Book Value of Equity + Net Debt))	tCO2e/ €M	27.3	46.8	-41.6%	59.2	-53.8%
Greenhouse Gas Policy	Reduction in Carbon Emissions	Paris Agreement aligned Business Plan	Y/N	Yes	Yes	N/A	Yes	N/A
		Net Zero Commitment	Y/N	Yes	Yes	N/A	Yes	N/A
		Interim Target for carbon reductions	Y/N	Yes	Yes	N/A	Yes	N/A

Sustainability Indicators		Topics	Metric	2022	2021	Change over 2021 (%)	2019*	Change over 2019 (%)
Energy	Energy Consumption	Renewable Energy Consumption	KWh	28,155,423.0	12,627,086.9	123.0%	13,217,384.8	113.0%
		Non Renewable Energy Consumption	KWh	334,334.0	12,131,907.1	-97.2%	16,822,126.2	-98.0%
		Total Energy Consumption	KWh	28,489,757.0	24,758,994.0	15.1%	30,039,511.0	-5.2%
		Share of Renewable Energy Consumption	%	98.8%	51.0%	93.8%	44.0%	124.6%
	Energy Production	Renewable Energy Production	KWh	N/A	N/A	N/A	N/A	N/A
		Non Renewable Energy Production	KWh	N/A	N/A	N/A	N/A	N/A
		Total Energy Production	KWh	N/A	N/A	N/A	N/A	N/A
		Share of Renewable Energy Production	%	N/A	N/A	N/A	N/A	N/A
Water	Water	Emissions to Water (1)	tCO2e	N/A	N/A	N/A	N/A	N/A
		Water Management Policy	Y/N	No	No	No	No	N/A
	Water Stress	Exposure to areas with high water stress	Y/N	No	No	N/A	No	N/A
Biodiversity	Biodiversity	Negative effects on biodiversity	Y/N	No	No	N/A	No	N/A
Waste	Hazardous Waste	Tonnes of hazardous waste	tCO2e	N/A	N/A	N/A	N/A	N/A
Fuels	Fossil Fuel Exposure	Activity in the fossil fuel sector	Y/N	No	No	N/A	No	N/A
People	Employees	Number of employees	Number	348.0	369.0	-5.7%	302.0	15.2%

Sustainability Indicators		Topics	Metric	2022	2021	Change over 2021 (%)	2019*	Change over 2019 (%)
People	Employees	Work-related Injuries	Number	0	0	0	0	0
		Safety-related accidents	Number	0	0	0	0	0
		Fatalities	Number	0	0	0	0	0
	Gender	Women in workforce	%	26.3	25.3	4.0%	24.2	8.7%
		Board gender diversity (women)	%	33.0	33.0	0.0%	0	0
		Leadership Team gender diversity (women)	%	22.0	22.0	0.0%	0	0
		Unadjusted gender pay gap (2)	%	N/A	N/A	N/A	N/A	N/A
UN Global Compact	Compliance	Signatory to the UN Global Compact	Y/N	Yes	No	N/A	No	N/A
	Violations	Occurrences of violations to the UN Global Compact	Number	0	0	N/A	0	N/A
Human Rights	Human Rights Policy	Human Rights policy available	Y/N	Yes	No	N/A	No	N/A
	Anti-Bribery	Occurrences of activities associated with anti-bribery	Number	0	0	N/A	0	N/A
	Controversial Weapons	Exposure to controversial weapons	Y/N	No	No	N/A	No	N/A
Security	Data Security	Training	Y/N	Yes	Yes	N/A	Yes	N/A
		Certifications (3)	Y/N	Yes	Yes	N/A	Yes	N/A
		Incidents	Y/N	No	No	N/A	No	N/A
TCFD	Transitional Risk	Identification and Assessment (4)	Y/N	Yes	No	N/A	No	N/A

Sustainability Indicators		Topics	Metric	2022	2021	Change over 2021 (%)	2019*	Change over 2019 (%)
TCFD	Climate Physical Risk	Identification and Assessment (5)	Y/N	Yes	Yes	N/A	No	N/A
ESG Policies	ESG Standards	Signatories to ESG related standards	Y/N	Yes	Yes	N/A	Yes	N/A
	Health and Safety	Implementation of a health and safety policy	Y/N	Yes	Yes	N/A	Yes	N/A
	Other Policies	Other ESG related policies	Y/N	Yes	Yes	N/A	Yes	N/A
Suppliers	Policies	Commitment to Supplier Code of Conducts from stakeholders	Y/N	Yes	Yes	N/A	Yes	N/A
	Supply Chain Impact	Significant actual and potential negative environmental impacts from suppliers	Y/N	No	No	N/A	No	N/A
		Significant actual and potential negative social impacts from suppliers	Y/N	No	No	N/A	No	N/A
Business	Business Impact	Significant actual and potential negative environmental impacts as a business	Y/N	No	No	N/A	No	N/A
		Significant actual and potential negative social impacts as a business	Y/N	No	No	N/A	No	N/A
NACE Code	Nace Code	Nace Code	Number	61.9	61.9	N/A	61.9	N/A

* 2019 GHG emissions indicate restated values
(1) Water utilised within office spaces and data centres for sanitary purposes
(2) Under HR investigation
(3) https://eunetworks.com/iso27001/
(4) The internal audit function leads a process working with the Leadership Team (LT) to identify risks to operations and facilities, including those related to physical events associated with climate change, such as impact of the climate change on network and demand e.g. rising sea levels and floods.

Appendix 3: Sustainability Commitments and Accomplishments

Date/Year	Commitments & Accomplishments	Date/Year	Commitments & Accomplishments
2010	Anti Harassment and Bullying Policy first published	March 2022	Science Based Targets (SBTs) validated by Science Based Target Initiative (SBTi)
2010	Business Ethics Policy first published	March 2022	UN Global Compact Signatory
2015	Anti-Modern Slavery Statement first published	May 2022	Microsoft Supplier Prestige Awards 2022 Winner: 'Showstopper of the Year: Strides in Sustainability'
2020	ISO 27001 Data Security Certification	June 2022	Inaugural Sustainability Report
June 2021	Carbon emissions (Scopes 1, 2 and 3) first reported for 2019 baseline year	September 2022	Global Carrier Awards 2022 Shortlisted: 'Best ESG Initiative'
October 2021	Science Based Targets initiative Business Ambition for 1.5°C Commitment	November 2022	CDP - Graded 'B'
November 2021	CDP - Graded 'D'	February 2023	UN Global Compact, SDG Ambition Accelerator completed
December 2021	Sustainability Linked Loan closed	August 2023	Sustainability Policy published
February 2022	Climate Pledge signatory commiting to Net Zero by 2040	August 2023	Supplier Code of Conduct launched
February 2022	SME Climate Hub Signatory	October 2023	Global Carrier Awards 2023 Winner 'Best ESG Initiative'

Appendix 4: Mandatory and Voluntary Disclosures aligned with SASB

SASB TOPIC/ CODE	ACCOUNTING METRIC	DISCLOSURE
Environmental footprint of hardware infrastructure		
TC-TL-130a.1	1. Total energy consumed 2. Percentage grid electricity 3. Percentage renewable	1. Total Gigajoules (GJ) consumed: 106.2Gj 2. Percentage grid electricity: 1.2%. 3. Percentage renewable: In 2021, euNetworks procured 98.8% of power (KWh) from renewable sources.
Data privacy		
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	1. Number of law enforcement requests for customer information, 2. Number of customers whose information was requested, 3. Percentage resulting in disclosure	None; euNetworks is not a consumer facing business.

Data Security

TC-TL-230a.1	1. Number of data breaches, 2. Percentage involving personally identifiable information (PII), 3. Number of customers affected	None
TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	• euNetworks operates an Information Security Management System (ISMS) framework and are internally and externally audited against ISO 27001:2013. • Data security has been identified as a material issue and appropriate risk management measures are in place and continually updated. • euNetworks tests the effectiveness of perimeter security controls to prevent and detect attacks (external penetration testing) annually. • euNetworks runs vulnerability scans on a scheduled basis. • euNetworks runs a Security Information Event Management (SIEM) platform to detect anomalies within the network. No significant data breaches experienced.

Data Security

TC-TL-230a.1	1. Number of data breaches, 2. Percentage involving personally identifiable information (PII), 3. Number of customers affected	None
TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	• euNetworks operates an Information Security Management System (ISMS) framework and are internally and externally audited against ISO 27001:2013. • Data security has been identified as a material issue and appropriate r isk management measures are in place and continually updated. • euNetworks tests the effectiveness of perimeter security controls to prevent and detect attacks (external penetration testing) annually. • euNetworks runs vulnerability scans on a scheduled basis. • euNetworks runs a Security Information Event Management (SIEM) platform to detect anomalies within the network. No significant data breaches experienced.

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