



Building on Progress: Leading with Responsibility and Impact

Planet, People, Prosperity, and Partnerships

Sustainability Report

December 2024



Table Of Contents

Overview

CEO’s Perspective

Driving Sustainability and Inclusive Growth: Our 2023 Milestones and Future Commitments

Accomplishments & Vision Ahead



ESG Materiality Matrix

Planet

People

Prosperity

Partnerships



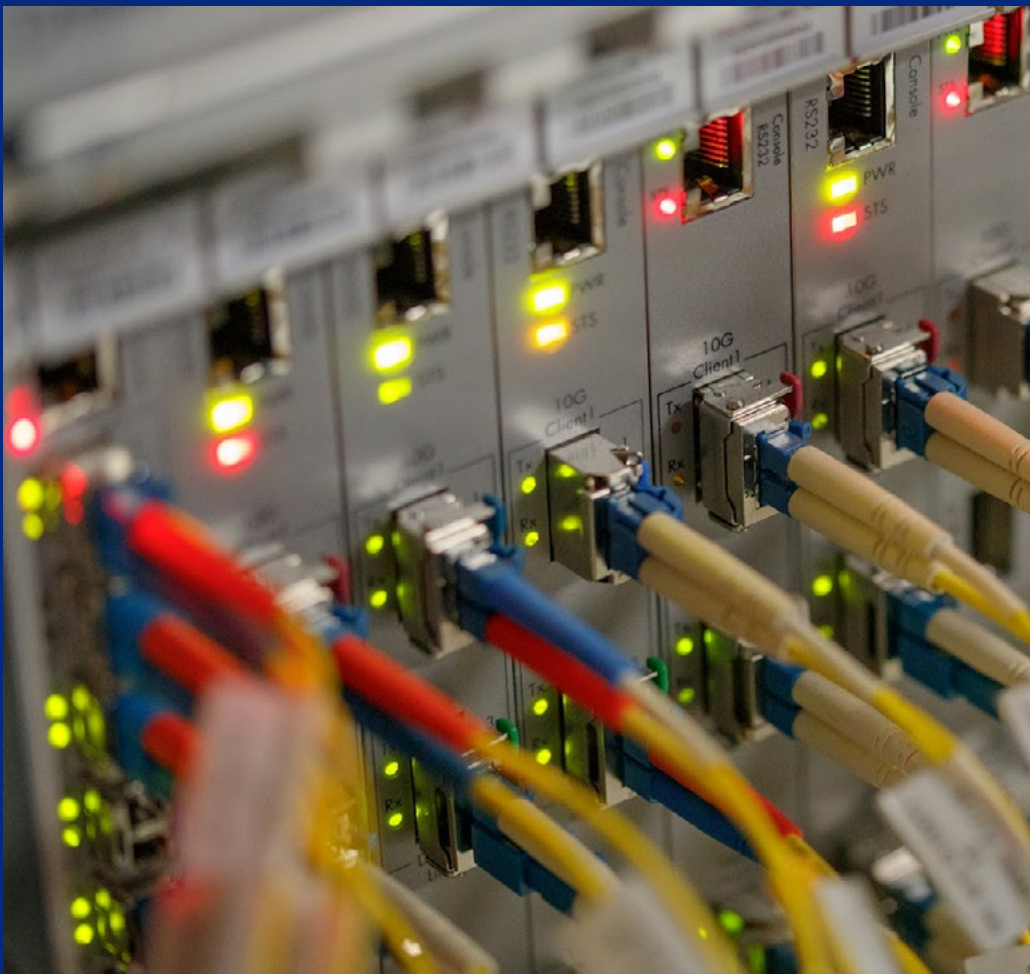
Appendices

Appendix 1: 2023 Emissions Summary

Appendix 2: Sustainability KPI Tracker

Appendix 3: Sustainability Commitments and Accomplishments

Appendix 4: Mandatory and Voluntary Disclosures aligned with SASB



CEO's Perspective

euNetworks has been on a sustainability journey for a number of years. While we continue to make great progress, we also continue to see just how much more there is to do.

We recognise that climate change is one of the greatest challenges of our time, and we are committed to taking decisive action to protect both the present and future. This requires embedding sustainable practices into our day-to-day operations and long-term strategies, ensuring that we create value for both people and the planet. It requires collaboration across our ecosystem for meaningful progress and it requires an approach centred on innovation and a willingness to invest as we strive to meet our goals.

1

Embedding Sustainability into Our Core Business

Sustainability is integral to our business, guiding how we serve some of the largest consumers of bandwidth, including Hyperscalers, content providers, and carriers. These customers are themselves leaders in making strides in sustainability, and we are proud to collaborate with them on solutions that address the environmental challenges facing our industry.

2

Collaboration for Collective Progress

Collaboration is key to driving meaningful change. By engaging with customers, suppliers, and investors, we identify priority actions and work together to achieve them.

Our customers value the detailed data we provide, which not only aligns with their sustainability goals but also challenges them to think differently. Similarly, our suppliers have embraced sustainability initiatives—such as project-based emissions reporting—helping us reduce Scope 3 emissions across our supply chain.

3

Innovation and Investment

We continue to invest in innovative carbon measurement tools like the Network Construction Carbon Calculator and Carbon by Service Calculator, which enable us and our customers to track emissions and make informed decisions about reducing carbon impact. These tools are essential as we work towards our ambitious goal of achieving Net Zero by 2040.

Achieving Net Zero by 2040 is a challenging but achievable goal that guides our business decisions. I want to extend my sincere thanks to our people, customers, suppliers, and investors for their dedication and support. Together, we are building a more sustainable future.

Thank you for being a part of this important journey.

Kevin Dean

Interim Chief Executive Officer



Driving Sustainability and Inclusive Growth: Our 2023 Milestones and Future Commitments

At euNetworks sustainability drives both our business growth and our commitment to environmental and social responsibility. In 2023 we reached significant milestones in reducing environmental impact and fostering inclusivity.

Over the past four years we have refined our carbon calculation methodology, which led to the re-baselining of our 2019 carbon footprint and a sharper focus on decarbonisation. As a result, euNetworks' Scope 1 and 2 emissions now account for less than 1% of our total footprint, leaving Scope 3 — primarily from network construction — constituting over 99% of our emissions and now our key focus to reduce. To achieve our Net Zero target by 2040,

we are concentrating on reducing these emissions through supplier engagement.

We have an active Supplier Engagement Programme in place. In the first instance, our focus is on collaborating with our most strategic and high-emitting suppliers. Those efforts strive to accelerate decarbonisation efforts across our entire supply chain and we extend our sincerest thanks to the teams who are helping us and supporting us with that.

Beyond our environmental achievements, we are also making meaningful progress in diversity at euNetworks. With 27.6% of our workforce now women — surpassing our 2023 social target — we are ensuring that

our growth is inclusive and over time, better reflective of the communities we serve. We recognise that Diversity, Equity, and Inclusion are essential to building, retaining, and developing the best teams, which in turn drive stronger business outcomes.

A diverse workforce strengthens euNetworks by bringing fresh perspectives, ideas, and innovative approaches, creating an environment that embraces adaptability and a pioneering mindset. With a team that reflects the world around us, we enhance our problem-solving, make more informed decisions, and continuously reinforce the resilience and forward looking perspective needed to lead and evolve.

Looking ahead, we remain unwavering in our commitment to achieving our Science Based Targets and reaching Net Zero by 2040. This journey requires continued collaboration with our suppliers, customers, and stakeholders, and together, we are building a more sustainable future for all.

I am incredibly proud of the progress we have made, and with sustained focus and dedication, I am confident that euNetworks will continue to set the benchmark for sustainability in our industry.

Richard Taylor

General Counsel & Chief
Corporate Officer





Accomplishments and Vision for Reporting Year 2023

euNetworks is committed to driving sustainable growth while minimising environmental impacts and making positive contributions to the wider community.

Our ESG agenda focuses on integrating environmental solutions with business growth, aligning closely with the interests of our stakeholders — customers, suppliers, investors, partners, employees, and communities. Our strategic approach targets areas where we can make the most meaningful impact, concentrating efforts on the key opportunities within the ESG framework.

The table on the right shows how our goals and accomplishments align with the United Nations Sustainable Development Goals (SDGs).

Planet

Leading environmental accountability

Ambition

Net Zero carbon commitment by 2040



Milestones

- 1

SBTi target: To reduce Scope 1 and Scope 2 GHG emissions 62% by 2030 from a 2019 base year*, and to measure and reduce Scope 3 emissions
- 2

55% reduction of Microsoft specific emissions across all scopes by 2030
- 3

Launch Supplier Engagement Programme

* 2019 base year was re-baselined, due to methodology changes

Achievements

- 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
- Reached 99.7% renewable energy procurement for own needs (Scope 2)
- Actively engaged customers by providing supplier-specific emissions data through the Network Construction Carbon Calculator and Carbon by Service Calculator
- Significantly reduced Scope 1 and 2 emissions, with Scope 3 now accounting for 99.8% of total emissions

Awards and Nominations

- Winner ‘Showstopper of the Year: Strides in Sustainability’, Microsoft Supplier Prestige Awards 2022
- Winner ‘Best Environmental, Social, Governance (ESG) Initiative”, Global Carrier Awards 2023
- Featured in 2024 Microsoft Supplier Summit showcasing our dedication to sustainability and inspiring others in the industry to follow our lead
- Nominated for the ‘Carbon Footprint’ category in the DSQ 2024 Sustainability Heroes Awards



Accomplishments and Vision for Reporting Year 2023

People

Nurturing employee well-being, diversity, equity and inclusion

Ambition

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



Milestones

- 1

Climate-related risks to be incorporated into financial statements
- 2

Commercial vendor due diligence policies progressed

Achievements

- As of 31 December 2023, 44% of our Executive Leadership Team and 33% of our Board of Directors were women
- We had 27.6% women in our workforce as of 31 December 2023
- GDPR compliant, with ISO 27001 certification for data security
- Established 7 company-wide DE&I ambitions, focusing on people growth, community engagement, and talent pool development
- Achieved a 95% success rate in our Apprenticeship programme

Continuing commitment to

- Provide company-wide Mental Health & Wellbeing Programme, providing mental health support to all employees
- Run active “You Belong Here” employee-led working groups to promote inclusion and belonging
- Enable access to the Accessibility Passport to ensure tailored support for employees with accessibility needs



Accomplishments and Vision for Reporting Year 2023

Prosperity

Igniting sustainable growth

Ambition

Blend financial growth with ESG commitments



Milestones

- 1

Climate-related risks to be incorporated into financial statements
- 2

Commercial vendor due diligence policies progressed

Achievements

- Established a Sustainability Governance structure to guide sustainability efforts
- Ensured zero accident and no safety-related fatalities
- Awarded CDP scores for 2022: ‘B’ (“Management”) for climate change reporting and ‘A-’ (“Leadership”) for supplier engagement
- Powered 99.7% of owned assets with renewable energy, exceeding the 2023 target of 98%
- Achieved 27.6% women representation, exceeding the 2023 target of 27.2%

Policies & Practices

- Published our 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



Accomplishments and Vision for Reporting Year 2023

Partnerships

Cultivating responsible partnerships

Ambition

Sustainable collaborations, maximised impact



Milestones

- 1

Partner with biodiversity NGOs
- 2

Integrate sustainability considerations into our RFP process

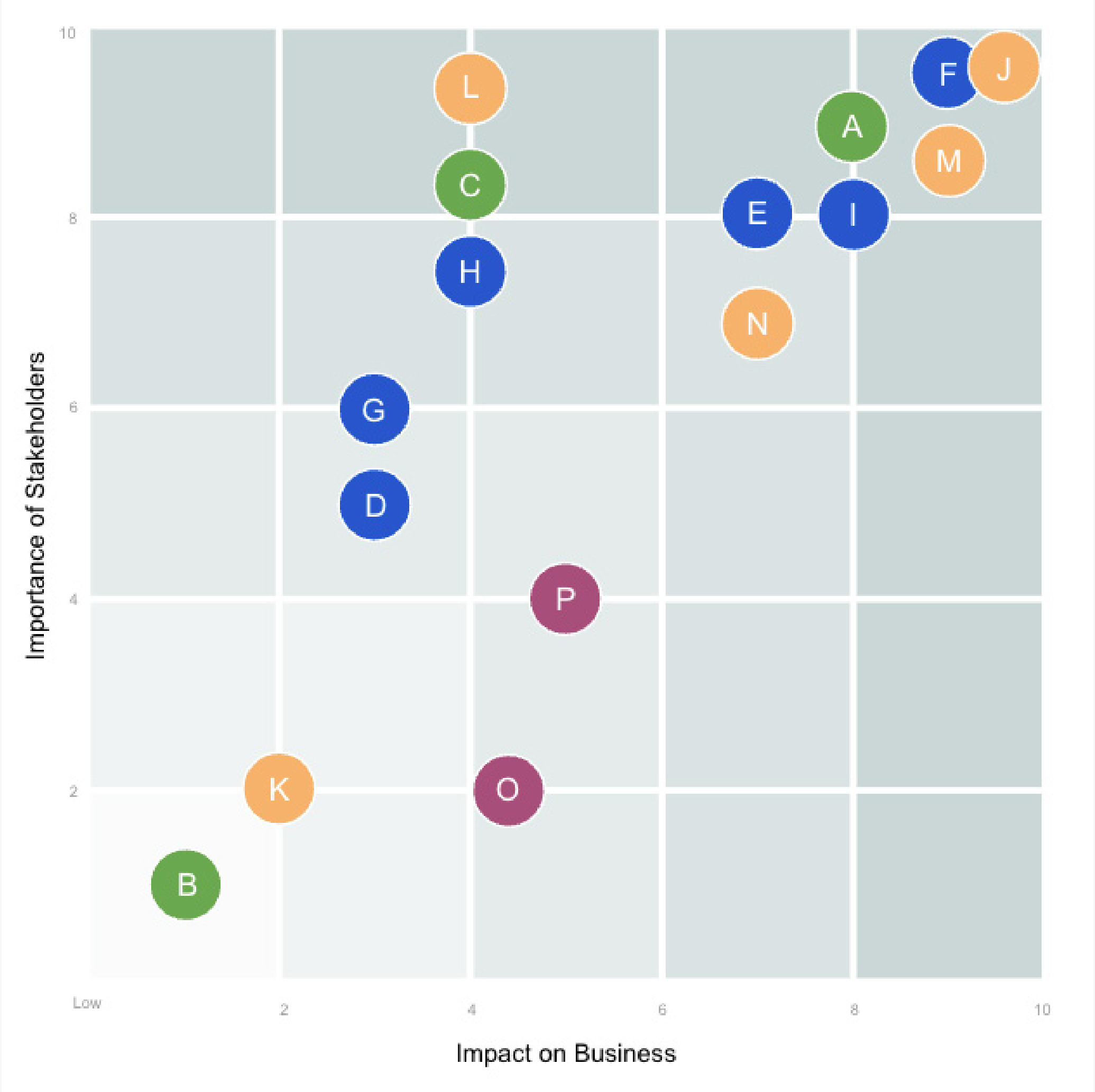
Achievements

- Secured active employee involvement in community and charitable initiatives
- Hosted supplier workshops, sharing sustainable construction best practices
- Engaged with suppliers to drive carbon reduction initiatives
- Continued LDN Apprenticeships partnership since 2013, with 39 apprentices completing the programme



ESG Materiality Matrix

We are committed to responsible growth that creates a positive impact. Our sustainable business model addresses societal challenges, while meeting customer needs and delivering returns for investors. The materiality assessment allows us to pinpoint the most important environmental, social, and governance issues. The results are displayed in the visualisation on the right*.



* We are expanding and revisiting our materiality matrix to reflect the evolving nature of our business. The updated matrix showcases our current status, highlighting shifts in priorities as we achieve targets and respond to emerging opportunities and risks.

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



ESG Materiality Matrix

Our strategic initiatives are designed to address the most critical priorities identified in our ESG Materiality Matrix, focusing on areas such as emissions reduction, supply chain sustainability, diversity and inclusion, and ethical business practices.

These actions ensure that we align our business objectives with the expectations of our stakeholders and make meaningful progress in each area.

Data security

Conduct annual external penetration testing and regular vulnerability scans to ensure network perimeter security.

Utilise a Security Information and Event Management (SIEM) platform to detect and respond to real-time network anomalies.

Maintained a flawless record with no significant data breaches in our history.

Business Ethics:
Established a comprehensive Business Ethics Policy to ensure integrity and transparency in all operations.

GHG Emissions

Collaborate with suppliers to assess and enhance their sustainability practices.

Automate emission monitoring and reporting to ensure accuracy and transparency.

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

Focus on reducing Scope 3 emissions by engaging key suppliers in decarbonisation strategies.

Leverage SBTs to guide emissions reduction efforts in line with global climate goals.

Employee Engagement, Diversity & Inclusion

Increase efforts to reduce the gender gap with targeted diversity strategies.

Drive initiatives: women on hiring panels, inclusive behaviours training, and DE&I statements in job ads.

Establish a company-wide hybrid working policy to support flexible work arrangements.

Promote an inclusive culture through employee resource groups and ongoing DE&I awareness programmes.

Supply Chain Management

Engage strategic suppliers to integrate sustainability performance metrics into all sourcing decisions.

Launched a Supplier Engagement Programme targeting our highest-emitting and most strategic suppliers.

Align environmental management with our SBTs for emissions reduction.

Ensure ethical and transparent operations through stakeholder engagement.

Hold suppliers accountable for managing their own supply chains and meeting our high sustainability standards.

Planet

Emissions at a Glance	12
Super Highways	14
Continuing to Drive Innovation	15
Protecting Biodiversity in Our Operations	16
Expanding with Purpose	17





Emissions at a Glance

The need for critical bandwidth infrastructure to become more sustainable is crucial. We are dedicated to confronting key environmental challenges, such as reducing our carbon footprint and climate change. This approach aligns with our core values, addresses stakeholder expectations, and contributes positively to the environment.

2023 represents the fourth consecutive year that euNetworks has measured its Scope 1, 2, and 3 GHG emissions. Throughout this period, we gained a clearer understanding of emission sources through an improvement in data quality, an insight that was previously limited when emissions were largely estimated based on spend. Our engagement with our highest emitting suppliers and the shift to using supplier-specific data have allowed us to further improve our emissions calculation methods.

These enhancements in data accuracy, along with updates to our methodologies, have led us to the recalculation of our 2019 base year emissions. Whilst we have

made some revisions to our 2021 and 2022 figures, we did not undertake a complete recalculation in line with our updated methodology. Consequently, our 2023 emissions can only be accurately compared against the adjusted 2019 baseline.

Overall Trend:

In 2023, euNetworks’ total Scope 1, 2, and 3 emissions increased by 1% compared to the recalculated 2019 baseline. euNetworks is committed to reducing its GHG emissions by 62% from the baseline year by 2030 in line with Science Based Targets, and to achieving Net Zero by 2040. Since the vast majority of emissions fall under Scope 3, meeting this goal will require thorough engagement with our supply chain to ensure accurate emissions reporting and decarbonisation efforts within their operations.

Scope	Emission Source	2023 (tCO2e)	2019 (tCO2e)*	Variance (%)
1	Natural Gas	-	11	-100%
1	Other Fuels	79	Not Reported	N/A
1	Company/Owned Leased Vehicles	3	13	-78%
1	Refrigerants and Other Fugitive Emissions	-	Not Reported	N/A
2	Electricity (location based)	8,877	13,104	-32%
2	Electricity (market based)	31	4,191	-99%
3	Purchased Goods and Services	46,734	34,538	35%
3	Capital Goods	5,902	5,095	16%
3	Fuel And Energy Related Activities	2,609	2,531	3%
3	Upstream Transportation and Distribution	16	2,132	-99%
3	Waste Generated in Operations	36	11	235%
3	Business Travel	28	944	-97%
3	Employee Commuting and Working From Home	301	184	64%
3	Upstream Leased Assets	5,230	10,695	-51%
3	Downstream Leased Assets	53	34	54%
	Totals	61,023	60,380	1%

Emissions at a Glance

Scope 2: Scope 2 emissions have decreased by 99% as the company has continued its transition to renewable energy sources across its sites. Similarly, emissions from our upstream leased assets have reduced by 51% compared to the base year, driven by investments in renewable energy.

Scope 3:
PG&S and Capital Goods: Emissions linked to purchased goods and services and capital goods rose by 35% and 16% respectively. This increase is driven by several factors, including higher expenditure on purchased services and a greater share of spending with more carbon-intensive suppliers in network construction. The rise in emissions is further compounded by the use of supplier-specific data instead of the Environmentally Extended Input-Output (EEIO) model, which primarily captures spend-based emissions.

Upstream Transportation & Distribution: We did not engage in any cable laying activities in 2023, resulting in a 99% reduction in

upstream transport and distribution emissions. The reported emissions are solely associated with the shipping of purchased goods.

Business Travel: Emissions have decreased by 97% compared to the base year, highlighting a significant reduction in the number of flights taken during this period.

Employee Commute & WFH: Emissions have increased by 64% compared to the base year, driven by higher rates of homeworking, which was uncommon before the COVID-19 pandemic.

While there has been a slight increase in overall euNetworks emissions, we have gained a clear understanding of the key sources driving these changes. We are actively engaging with key suppliers and implementing targeted actions to address these emission hotspots, driving reductions to meet our ambitious climate targets.

	2023 Value (tCO2e)	2019* Value (tCO2e)*	2023 to 2019
Scope 1	82	24	242%
Scope 2	31	4,191	-99%
Scope 3	60,910	56,165	8%
Total	61,023	60,380	1%

* 2019 baseline adjusted following changes in calculation methodology



Super Highways: Paving the Way to Energy Efficiency

We are committed to innovation and delivering the best optical fibre networks to our customers. As part of this commitment, we are investing in new long haul fibre routes, known as Super Highways, which lie at the core of our business growth strategy.

The Super Highways are designed to meet Europe’s growing demand for bandwidth with new infrastructure that also focuses on reducing overall emissions through sustainable advancements. These routes focus on areas with the highest traffic demand, utilising unique, direct long haul paths that bypass common capacity bottlenecks. By engineering routes that follow the shortest possible distances between cities, we achieve the lowest latency for services and increase efficiency.

The fibre technology deployed on these routes upgrades previously installed assets, optimising network efficiency. Our modern

low-loss fibre offers lower attenuation, improving photonic performance across the network. This allows us to provide customers with higher-capacity connectivity, while simultaneously reducing the power required to light the fibres, resulting in greater energy efficiency.

Thanks to the advanced nature of these fibres, we can design routes with wider spacing between in-line amplifiers (ILAs). Traditional long haul routes typically require amplification every 70km, but with Super Highways, we extend this distance to around 100km. This reduction in ILAs not only lowers construction demands and resource use but also enhances operational efficiency. The new ILAs are built with durable, high-reliability equipment, paired with state-of-the-art cooling systems, reducing long-term power consumption and further enhancing energy efficiency.

In terms of emissions, the reduced ILA overhead means a lower carbon footprint per bit of data delivered. This power efficiency is quantified using our proprietary Carbon by Service Calculator, which measures the emissions associated with running services over these fibres.

Customers can clearly see the difference in carbon emissions when choosing Super Highways over traditional long haul routes. Additionally, our Network Construction Carbon Calculator allows us to assess project-based emissions for the Super Highways, enabling us to factor carbon impacts into the design of new routes.

ILA Spacing = 100km, compared to traditional long haul routes

Shorter routes to decrease latency

All owned data centres, ILAs and Cable Landing Stations on 100% renewable energy

Reduced ‘carbon per bit’





Continuing to Drive Innovation: Empowering Customer Growth

Innovation remains at the heart of our commitment to sustainability and customer growth. Understanding our customers’ decarbonisation challenges has driven us to develop tools that not only enhance transparency but actively support their carbon reduction efforts. Two key innovations — the Network Construction Carbon Calculator (NC3) and the Carbon by Service Calculator — are enabling us to work closely with our customers to measure and reduce emissions associated with network development and service delivery.

Network Construction Carbon Calculator (NC3)

The NC3 is a powerful tool we use to help customers decarbonise their network infrastructure purchases. For instance, when working with a customer to calculate

emissions, we proposed utilising existing routes on our network rather than installing new infrastructure, leading to a 60% reduction in emissions. The NC3 tool allows us to perform detailed life cycle assessments, identifying key areas where emissions can be mitigated, helping customers lower their Scope 3 emissions from initial proposals.

The calculator has also enabled us to explore alternative materials and methods to further reduce construction emissions.

Two recent examples include:

- Replacing traditional fuel-powered machinery with electric equipment, which halved overall emissions.
- Substituting regular diesel with biodiesel, resulting in an 18% reduction in emissions.

These innovations, captured through the NC3, show how our customers can significantly reduce their carbon footprints by partnering with euNetworks. By providing solutions that decarbonise network infrastructure, we actively support our customers in achieving their sustainability objectives.

Carbon by Service Calculator

Accurate data is critical for customers striving to manage their supply chain emissions. The Carbon by Service Calculator provides transparency and insights into the emissions associated with each of our services. This tool empowers customers to track, manage, and forecast their emissions linked to euNetworks’ services, enabling them to make informed decisions about their carbon impact.

We engage proactively with our customers, providing annual emissions reports for their service portfolios, and we offer emissions data with every new quote, ensuring transparency at every stage of the sales process. By integrating emissions data into each deal, customers can better understand the carbon impact of their purchases and identify opportunities to reduce their Scope 3 emissions.

Similar to the NC3, the Carbon by Service tool offers a life cycle assessment of service delivery, allowing us to pinpoint key drivers of emissions. This insight deepens our collaboration with customers and drives the engagement with suppliers necessary to achieve meaningful reductions across the supply chain.

CASE STUDY



Case Study: Decarbonisation with Digital Realty

euNetworks partnered with Digital Realty to assess and quantify the emissions associated with the services provided to their European operations. With ambitious sustainability targets, including a Net Zero goal by 2030, Digital Realty sought innovative ways to reduce the carbon embedded in their bandwidth solutions. Through close collaboration, we explored advanced strategies to minimise emissions, supporting Digital Realty’s supplier engagement programme. euNetworks delivered the gold standard of carbon data that Digital Realty required, helping them meet their rigorous sustainability benchmarks.



In 2023, Digital Realty launched its formal Supplier ESG programme, in part to advance progress towards its Scope 3 science-based carbon emission reduction target. We continue to work with our suppliers to obtain primary emissions data rather than spend-based estimates and we highly value euNetworks’ shared goals in this area.

Sormeh McCullough, ESG Director, Digital Realty

Protecting Biodiversity in Our Operations

Biodiversity is a key consideration in our activities, for our direct operations and those of our subcontractors. We recognise the importance of preserving the ecosystems in which we operate, and we have implemented strict measures to ensure minimal environmental impact.

Our approach involves rigorous oversight of all operations, with clear guidelines in place to monitor and manage the potential risks posed to biodiversity. Whether we are laying new fibre networks or maintaining existing infrastructure, we conduct all activities to the highest level of care, adhering to both internal standards and local environmental regulations.

Subcontractors working with euNetworks are also required to comply with these biodiversity protection measures, ensuring

that we collectively minimise our ecological footprint.

By embedding these safeguards into our operational processes, we are committed to protecting biodiversity and ensuring that our growth is achieved in harmony with the natural environment.

Natura 2000

Natura 2000 is a network of protected areas across Europe, safeguarding some of the continent’s most valuable and threatened species and habitats.

At euNetworks, we recognise the critical importance of these ecosystems to our planet. In our Amsterdam network, we have carefully designed fibre routes to avoid Natura 2000 zones, ensuring the protection of biodiversity and habitats surrounding our infrastructure.

This approach allows us to deliver high-quality bandwidth to customers while also supporting the growth and preservation of ecosystems within these protected areas.

Invasive Species Management, UK

In collaboration with our UK contractor, we have implemented an Invasive Species Management Plan aimed at controlling or eliminating the spread of invasive species. For example, we have identified Japanese Knotweed when planning a new route in London. Depending on factors such as longevity of site treatment, soil burial and bund availability, we have different measures to eliminate such species before construction. This plan ensures ecosystems remain balanced, allowing a diverse range of species to thrive by preventing any single species from dominating the environment. This initiative enables us to protect the ecological integrity of the areas in which we operate.

By managing invasive species, we safeguard biodiversity while ensuring that our infrastructure development is aligned with environmental responsibility. This plan allows us to continue delivering high-quality bandwidth services to our customers, integrating ecological considerations into our operations without compromising on performance.





Expanding with Purpose: The Sofia Office

In February 2024, euNetworks expanded its European presence by opening a new office in Sofia, Bulgaria. We selected Sofia for its strategic European location, cultural compatibility, and abundant pool of skilled IT professionals. Our office is situated just outside the city centre but remains easily accessible via public transport and is surrounded by excellent amenities. The upcoming opening of a new metro station will further enhance commuting options for our employees, aligning with our goal of minimising Scope 3 commuting emissions, which we report annually as part of our GHG inventory.

The office features energy-efficient lighting systems with motion sensors and automated energy tracking, ensuring optimal energy use. Operating on 100% renewable energy, the Sofia office contributes to achieving our Scope 2 emissions targets. By integrating

these technologies, we are improving energy efficiency across our operations and actively reducing consumption.

A key innovation in the Sofia office is its advanced waste management system. While all euNetworks offices promote recycling, Sofia has taken this further by implementing AI technology to help employees segregate waste more effectively. The AI system identifies different types of waste and ensures they are sorted into the correct recycling bins, improving accuracy and reducing contamination in recycling streams. This leads to more materials being properly recycled and contributes to our circular economy efforts by maximising reuse and minimising waste sent to landfills. Although waste emissions at euNetworks are minimal, the introduction of AI-driven solutions enhances our waste management processes, reflecting the same efficiency we achieve in our network operations.

The Sofia office represents a milestone in our expansion, reinforcing that growth and sustainability can be achieved in parallel. This office supports our long-term objectives by providing a space designed with efficiency, environmental responsibility, and employee well-being in mind.



People

Diversity, Equity and Inclusion	19
Mental Health	22
Data Security	22





Diversity, Equity and Inclusion (DE&I)

Our people are at the heart of our successes. Strengthening diversity, equity, and inclusion within euNetworks is crucial to empowering the diverse communities in which we operate. Our DE&I strategy focuses on fostering an inclusive culture that values the importance of different backgrounds, experiences, and beliefs.

We have made significant progress in embedding DE&I into our broader company culture and community engagement, reflected in our workforce and leadership data. Through initiatives like Girls in Tech and Pride Matters in Tech, we raise awareness of our DE&I ambitions and create meaningful connections. These activities reinforce our commitment to integrating DE&I into our business objectives, while also highlighting the positive impact this has on our employees and the wider community.

Driving Meaningful Change

- 33% of our Board of Directors are women.
- 27.6% of our workforce identifies as women, exceeding the 2023 Social KPI by 0.4%.
- Target set to achieve 30% women representation in the workforce by 2026.
- Established eight You Belong Here groups, addressing gender, sexuality, physical and mental conditions, and employee location.
- Actively supporting Pride in Tech, further strengthening the LGBTQ+ community at euNetworks.
- Each manager must include one sustainability-based objective as part of their annual performance goals.
- Refined recruitment process with increased diversity on hiring panels.
- DE&I statements included in all new job advertisements.

Sofia Office Progressing Diversity Targets

The Sofia office has set ambitious diversity goals in line with the company’s overall targets and the KPIs in our Sustainability Linked Loan (SLL). Since its opening, the Sofia office has grown to 23 employees across departments such as NOC, Sales, and Finance. Sofia is playing a key role in driving company-wide progress on gender diversity. While the 2024 SLL KPI for women in the workforce is set at 28.1%, Sofia is already exceeding this with 35.1% female representation. This contribution brings us closer to meeting our overall diversity targets ahead of schedule. As the Sofia office continues to expand, it remains a critical part of our journey towards a more diverse and inclusive workforce across all euNetworks locations.



“euNetworks has provided me with comprehensive training sessions, accessibility to the latest resources and constant support for me to grow in my role. Overall, the support from euNetworks has been crucial for my professional growth and in driving the success of the new team and new business initiatives in Sofia.”

Aneta Manova, Account Manager



Empowering Women: Girls in Tech Day

To inspire young women to pursue careers in technology and telecommunications, euNetworks hosted its inaugural Girls’ Tech Day in London. We welcomed 20 students from two local all-girls’ schools, aiming to encourage aspirations around entering what is a traditionally male-dominated industry.

The interactive event featured presentations from women in our Leadership Team, who shared insights into their careers, personal branding, and experiences within the tech sector. These sessions provided the students with real-world perspectives and motivation to consider future opportunities in technology.

To illustrate how we deliver services to end customers, we created an engaging TikTok video demonstrating how data travels through fibre optic networks, connecting data centres and mobile towers. By relating a familiar platform like TikTok to telecommunications, we showcased our service portfolio—including Wavelengths, Dark Fibre, and Ethernet — and how these products enable global connectivity.

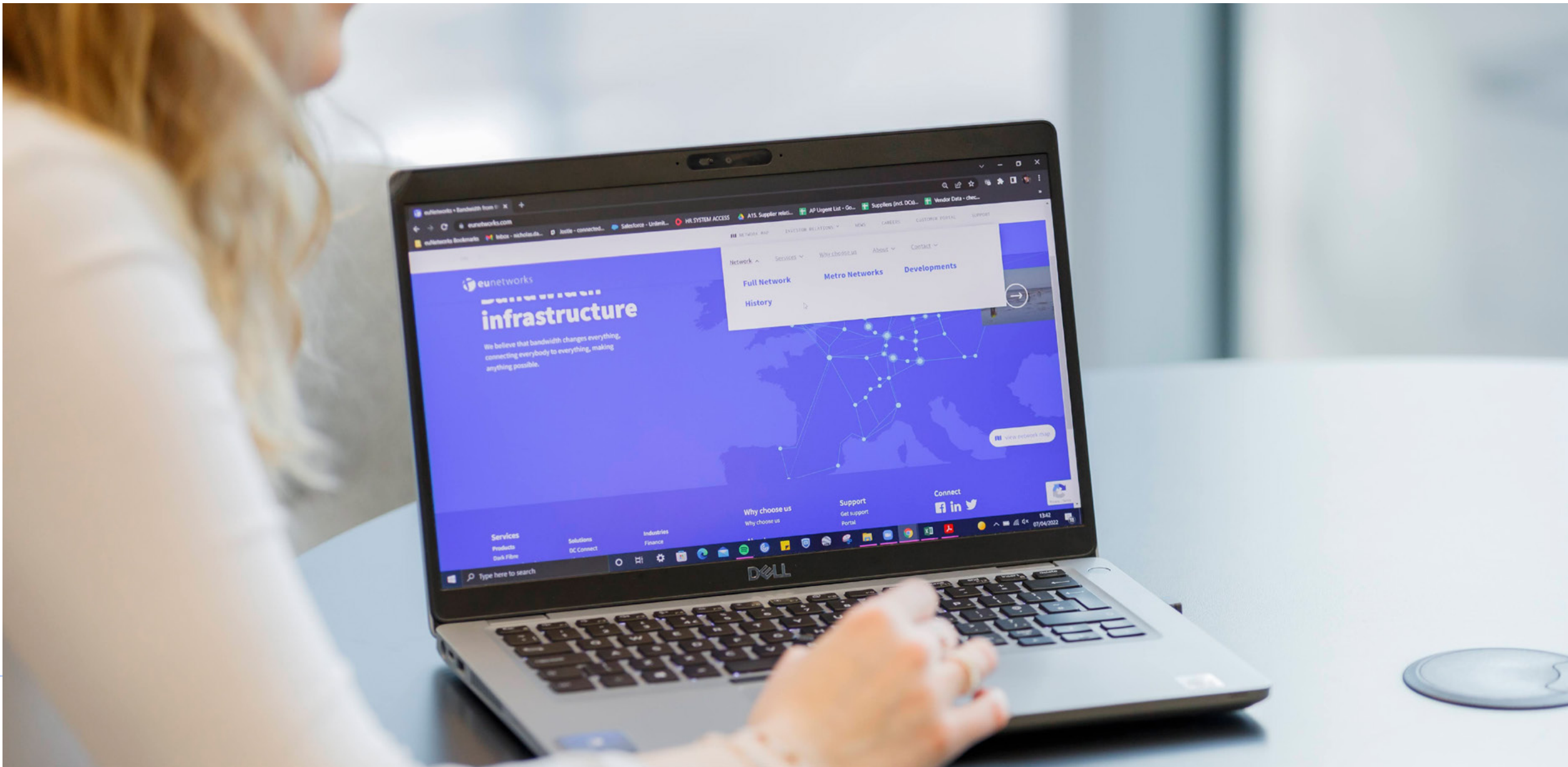
December 2024

We also highlighted the various career paths available at euNetworks, emphasising our robust apprenticeship programme established in 2013 and our graduate scheme. These programmes offer valuable opportunities for starting a career in telecommunications, particularly for women. The students participated in roundtable discussions with current apprentices and graduates, who shared their experiences, interview tips, and insights into their roles at euNetworks. The day concluded with personal pitch sessions, allowing the girls to apply what they had learnt throughout the event.

To round off the experience, we shared euNetworks’ sustainability journey, providing an overview of our business growth and the critical role sustainability plays in our future. This discussion highlighted emerging career opportunities for the next generation of women in technology, in new sectors and markets, showcasing the breadth of expanding possibilities within the dynamic field of telecommunications.



GIRLS TECH DAY
7th March 2024





CASE STUDY



Pride Matters in Tech

In June 2023, euNetworks, alongside partners from across the telecommunications industry, launched Pride Matters in Tech. The initiative was founded on three core values: Community, Equity, and Impact. Its primary purpose is to promote LGBTQ+ inclusion, with a particular focus on transgender and non-binary representation, responding to the current challenges and ensuring support for these communities within the industry.

We established a LinkedIn community to gather feedback and insights, allowing participants to share their views and recommendations on advancing the initiative. Based on this input, three “How to” guides were developed, aimed at fostering transgender inclusion for various internal and external stakeholders.



One of the key moments in the launch was a panel discussion hosted by one of our partners, focusing on the role of the LGBTQ+ community in influencing business decisions and securing leadership buy-in. Alongside the panel, various activities were held to raise awareness, provide a platform for open dialogue, and offer a safe space for participants to share their views.

The Pride Matters in Tech initiative has gained momentum, with active participation from a growing and enthusiastic LGBTQ+ community. Through ongoing collaboration, we remain committed to spreading our message and supporting inclusivity in the technology sector and beyond.



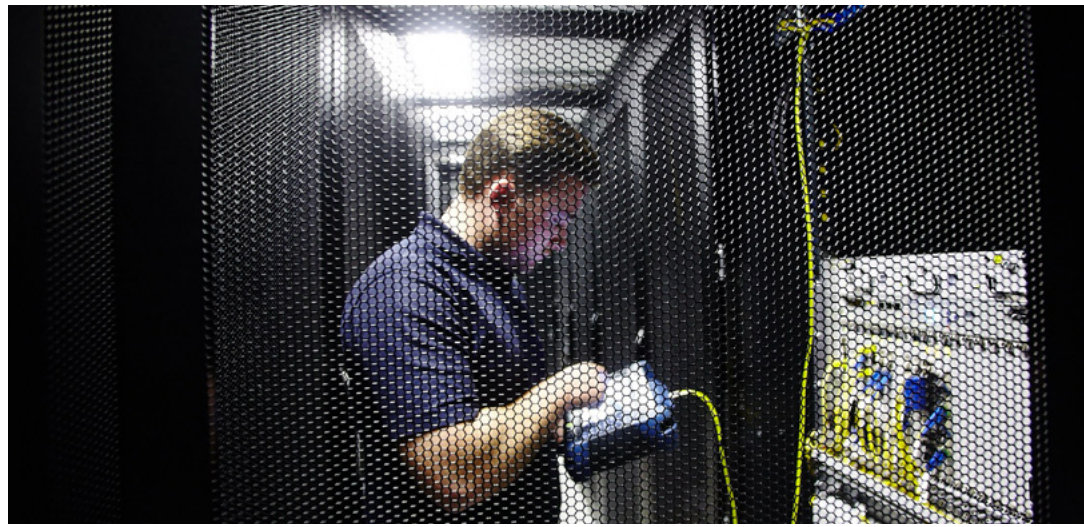
Community

We aim to build a supportive network that unites individuals to drive LGBTQ+ inclusion within their organisations. This involves facilitating accessible support, engaging non-LGBTQ+ employees, and fostering collaboration with external stakeholders.



Equity

We strive to help organisations achieve higher LGBTQ+ standards by promoting best practices in the telecommunications industry. This includes establishing inclusive policies and encouraging knowledge-sharing to create a workplace where all employees feel safe, valued, and respected, regardless of sexual orientation or gender identity.



Impact

Our goal is to make a lasting impact by supporting employees in building strong business cases for inclusion and securing backing from other telecommunications companies. We aim to use our collective voice to advocate for LGBTQ+ inclusion across industries, extending our influence beyond the tech sector.



Mental Health

euNetworks prioritises mental health as a key pillar in maintaining a productive and satisfied workforce. Our initiatives include six hours of mental health awareness training for all new employees, which includes workshops, seminars, webinars and online resources.



euNetworks stands out as an exemplary employer due to its strong focus on workplace mental health and wellbeing. Over the past six years, the company has actively promoted awareness and understanding through comprehensive training for managers and employees alike.

Perhaps the most notable achievement is the progressive corporate culture, where open discussions about mental health challenges are normalised, and diversity and inclusion are seamlessly integrated into the company's values.

Data Security

We are committed to maintaining the highest standards of data security to ensure seamless business operations and protect our customers' information. We have established an Information Security Management System (ISMS) aligned with ISO 27001, and regular internal and external audits help us maintain compliance and continually improve our information security practices across all operations.

By integrating ISO 27001 into euNetworks risk management processes, we proactively identify and mitigate potential security threats. This approach not only safeguards our operations, but also ensures compliance with various legal requirements, enhancing trust among our customers and stakeholders.

In addition to maintaining our ISO 27001 certification, we have developed a comprehensive framework that assesses business impact and crisis management. This includes safeguarding measures and recovery plans to defend against cyberattacks.

Our commitment to data security extends to the protection of internal, customer, and

partner data, and we are proud to report that no significant data breaches have occurred to date.



Prosperity

Strategic Leadership for Sustainability	24
Strategic Alliances and Disclosures	25
Sustainable Funding: Driving Business Growth	26
Road to Decarbonisation: Supplier Engagement	27





Strategic Leadership for Sustainability

We are fully committed to integrating sustainability into our business growth. Through strong leadership and robust governance, euNetworks places sustainability at the forefront of our strategies, driving socio-economic and environmental benefits for all of our stakeholders.

Our Board Sustainability Committee leads our sustainability efforts. The Committee meets regularly to steer our strategy, addressing environmental challenges, climate change, and mapping out solutions to real-world issues.

Complementing the Board Committee is the Sustainability Steering Committee, which oversees the execution of our sustainability strategy. This team, made up of representatives from various business units, identifies growth opportunities through a sustainability lens and ensures that initiatives are implemented in line with our broader targets.

Preventing Modern Slavery

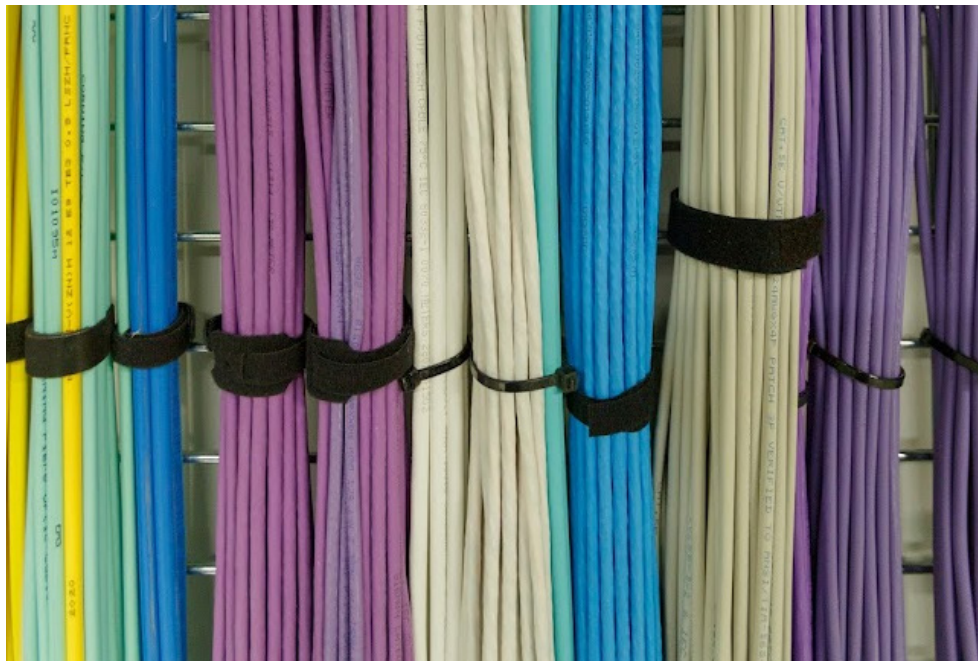
Our commitment to ending slavery, human trafficking, and forced labour is outlined in our [Slavery and Human Trafficking Statement](#), which is aligned with our Sustainability Policy. This demonstrates our dedication to ensuring that all stakeholders are treated ethically and their human rights upheld.

Global Health and Safety Policy

We have established a [Global Health and Safety Policy](#) to enhance management support for health and safety initiatives, develop a robust global health and safety management framework and improve project planning. This policy ensures consistent practices and a strong commitment to the wellbeing of employees and contractors across all operations.

Collaborating with Suppliers for Sustainable Change

We aim to build a supportive network that unites individuals to drive LGBTQ+ inclusion within their organisations. This involves facilitating accessible support, engaging non-LGBTQ+ employees, and fostering collaboration with external stakeholders.



Implementing Our Sustainability Policy

In addition to supplier collaboration, our [Sustainability Policy](#) reflects our commitment to adopting sustainable practices and reducing our environmental impact. We actively engage with both customers and our supply chain to encourage similar actions across the industry.

Our [Sustainability Steering Committee](#) has successfully implemented the policy throughout our business operations and continues to monitor progress to ensure alignment with our sustainability goals.





Strategic Alliances and Disclosures

CDP Reporting

euNetworks remains fully committed to CDP reporting as a critical platform for transparently communicating our progress in mitigating climate change. Our efforts focus on reducing greenhouse gas emissions, managing energy consumption, addressing supply chain emissions, and assessing risks and opportunities. In our latest 2022 disclosure, completed in 2023, we maintained a ‘B’ (Management) rating, consistent with our 2021 reporting year.”

We recognise the room for improvement, so we have identified key areas and are actively implementing initiatives to strengthen our performance in the next reporting cycle.

UN Global Compact

As a signatory to the UN Global Compact, euNetworks aligns its ESG strategy with the Ten Principles, covering human rights, environmental actions, labour practices, and anti-corruption. This commitment reflects our dedication to corporate sustainability,

ensuring that our strategies support the interconnected challenges outlined by the UN’s Sustainable Development Goals (SDGs), as highlighted at the beginning of this report.

Our participation in the SDG Accelerator underscores our focus on accelerating progress towards achieving the SDGs by 2030, demonstrating our proactive approach to sustainability on a global scale.

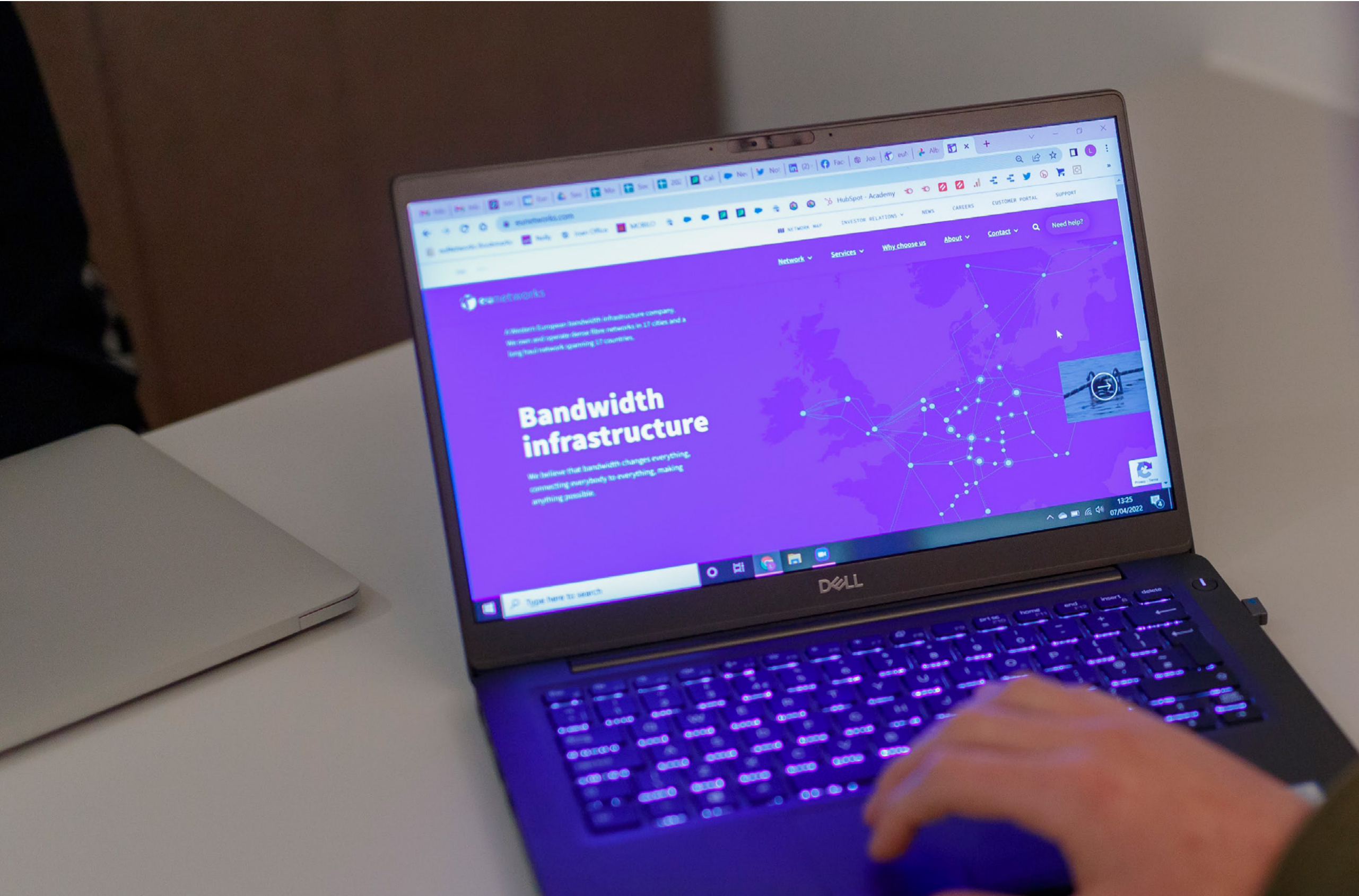
SME Climate Hub

Since joining the SME Climate Hub in February 2022, euNetworks has actively committed to reducing its environmental footprint in line with internationally recognised climate targets. We have pledged to cut emissions by 50% by 2030 and achieve Net Zero by 2050, aligning with the Paris Agreement.

As part of the UN’s Race to Zero campaign, the SME Climate Hub provides us with invaluable tools and resources to support our journey toward a healthier, fairer, and Net Zero future.

ESOS Compliance

euNetworks complies with the Energy Savings Opportunity Scheme (ESOS), a mandatory UK regulation that requires us to measure, track, and reduce energy consumption across our UK assets. Our participation in ESOS ensures we remain accountable for improving energy efficiency and minimising our environmental impact. Our participation in ESOS ensures we remain accountable for improving energy efficiency and minimising our environmental impact.



Sustainable Funding: Driving Business Growth

In December 2021, euNetworks successfully completed the refinancing of its existing debt, unlocking significant committed debt facilities under a Sustainability Linked Loan (SLL). This long-term infrastructure financing, totalling €760 million, supports the investment in modern bandwidth infrastructure across Europe. The SLL is directly tied to key environmental and social performance targets, aligning with our ESG goals.

The SLL is based on two key performance indicators (KPIs), which establish benchmarks for environmental and social sustainability. Achieving these benchmarks results in margin adjustments to the interest rate under the SLL:

- **Downward adjustments** are applied when the Environmental and Social Targets are exceeded.
- **Upward adjustments** occur when the

- targets are not met.
- No adjustments are made if performance falls between the baseline and target scores.
The KPIs are as follows:
 - **Environmental:** For the year ending 31st December 2023, a specific percentage of electricity must be sourced from renewables to power owned assets. From 2024 onwards, the target shifts to reducing greenhouse gas emissions, aligned with our Science Based Target of a 62% reduction from the 2019 baseline by 2030.
 - **Social:** This target tracks the percentage of employees, as of 31st December each year, who are women, relative to the total number of employees.

Exceeding Targets in our KPIs:

Environmental: In 2023 euNetworks exceeded its renewable energy procurement target of 98%, achieving 99.7% renewable energy usage across multiple sites, including colocation centres in Germany, ILAs, cable landing stations, and offices.

Social: With women representing 27.6% of the workforce (94 out of 341 employees), euNetworks achieved a 0.4% increase on its 2023 representation target of 27.2%.

Year	Environmental Sustainability Benchmark			Social Sustainability Benchmark		
	Target Score*	Target Emissions (tCO2e)	Performance	Baseline Score	Target Score	Performance
2022	≥ 82%	N/A	98.8%	≥ 25.3%	≥ 26.3%	26.3%
2023	≥ 98%	N/A	99.7%	≥ 26.3%	≥ 27.2%	27.6%
2024	≥ 28.2%	-	-	≥ 27.2%	≥ 28.1%	-
2025	≥ 33.8%	-	-	≥ 28.1%	≥ 29.1%	-
2026	≥ 39.4%	-	-	≥ 29.1%	≥ 30.0%	-
2027	≥ 45.1%	-	-	≥ 30.0%	≥ 30.9%	-

*The Environmental Sustainability Benchmark for 2022 and 2023 was set based on a target to procure renewable electricity. From 2024, the target for emissions reduction from the 2019 baseline, in line with Science Based Targets.



Road to Decarbonisation: Supplier Engagement

Reducing our Scope 3 emissions is dependent on working with our suppliers who cause these emissions. We have segmented our suppliers into four categories, based on carbon impact, and strategic importance:

Priority Suppliers	High carbon impact and critical to euNetworks' operations.
Core Suppliers	Significant spend, but with lower carbon impact than Priority Suppliers.
Tail Suppliers	Lower carbon impact and lower strategic importance.
Residual Suppliers	Minimal carbon impact and limited strategic relevance.

Priority and Core suppliers account for around 90% of Scope 3 emissions. For Priority Suppliers, we have implemented individual engagement plans based on their maturity in emissions reporting and decarbonisation efforts. To meet our Science Based Target of a 62% absolute reduction in emissions from our 2019 baseline by 2030, our suppliers must improve the accuracy of their emissions data, enhancing the overall quality of our Scope 3 reporting. Beyond reporting, close collaboration with our suppliers will be essential to align decarbonisation initiatives with our reduction efforts. This will require ongoing monitoring of progress and knowledge-sharing across the supply chain to accelerate the implementation of decarbonisation measures.

Progress and Insights

Discussions with our suppliers have been encouraging, with significant progress made in both reporting and setting decarbonisation targets. Key examples include:

- A Dutch Construction Supplier has made significant progress in emissions reporting since our engagement began. Previously unfamiliar with the process, the supplier has now implemented project-

based reporting, set clear emissions reduction targets, and refined its carbon accounting methodology. Additionally, we are actively collaborating to identify ways to further enhance the sustainability of our projects.

- French Construction Supplier has adopted our recommendations and is developing a calculator to enable its subcontractors to forecast project-based emissions, moving away from expenditure-based estimates.

These examples demonstrate how our supplier engagement programme is directly reducing emissions across the supply chain. By improving supplier emissions reporting and collaboration, we are making steady progress towards meeting our Science Based Targets and achieving Net Zero by 2040.



Partnerships

Corporate Partnerships	29
Volunteering	30





Corporate Partnerships



LDN Apprenticeships

For over a decade, euNetworks has partnered with LDN Apprenticeships, offering young professionals an alternative pathway to kickstart their careers. Since the programme’s inception, 39 apprentices have participated, with 90% continuing their careers at euNetworks after completion. This programme plays a key role in our business culture, driving early careers and also reflecting the company’s values and commitment to diversity, welcoming participants across a range of ethnic backgrounds, neurodiversity, and socio-economic backgrounds.



Young Enterprise

To further support early careers, euNetworks has joined forces with Young Enterprise, a UK organisation focused on equipping

students with employability skills and preparing them for the transition into the corporate world. Four volunteers actively engaged with 10 students, for around 4 months, offering support in business and product development while encouraging more young people to explore opportunities in the STEM sector and within the telecoms industry.



Host in Ireland

euNetworks is proud to support Host in Ireland’s ‘DC for Bees’ initiative, promoting ecological well-being by collectively planting over 3,400 mixed fruit orchards (nearly 18,000 trees) across 32 counties in Ireland. Our Irish colleagues, along with their families, contributed by planting trees at schools, community centres, and local farms. These efforts are vital in creating green spaces and habitats for wildlife, particularly bumblebees, whose populations are in decline. This partnership, established in 2021, plays a key role in preserving ecosystems, supporting biodiversity, and promoting sustainable food production.



South East Rivers Trust

In collaboration with the South East Rivers Trust, euNetworks is working to improve water quality and protect freshwater ecosystems. Over the course of five hours, a team of 10 participated in a river cleanup, targeting one of the 12 tributaries feeding into the River Thames. The successful event highlighted the scale of waste pollution in rivers, and we plan to continue supporting the Trust through follow-up volunteering efforts to positively impact local ecosystems.



KidsOut:

euNetworks, in partnership with Ciena, supports KidsOut, an organisation dedicated to providing positive experiences for children in refuge. Through the efforts of 7 volunteers, we help bring joy to children in difficult circumstances, contributing to their growth and future societal impact.

J.P.Morgan

JP Morgan:

Our Frankfurt office participated in the annual JP Morgan Corporate Challenge, a fitness and well-being initiative. The event, with 25 colleagues running and finishing, has strengthened team morale and fostered valuable partnerships, balancing work with fitness.





Volunteering: The Power of Giving Back

Following the launch of our volunteering policy, teams across Europe have actively participated in various initiatives to make a positive impact on society. We are proud of the dedication shown by our employees, who go the extra mile to make a difference in their communities. Their efforts truly reflect the core values of euNetworks, fostering a culture of responsibility, engagement, and support for the wider community.

Ireland

In addition to our partnership with Host in Ireland, our Dublin office participated in a local litter picking initiative near the office. With litter posing significant waste challenges both locally and globally, this effort was an important step in addressing the ongoing issue and reinforcing our commitment to environmental responsibility.

The Netherlands

Our Amsterdam team has volunteered in a variety of activities, from beach clean-ups near our Cable Landing Station in IJmuden to preparing lunches at a Salvation Army camp. These efforts have fostered a strong sense of community and demonstrate the commitment of our Amsterdam team to making a positive impact.

The UK

A wide range of volunteering activities has taken place in London, showcasing the team’s dedication across various causes:

- **Trolley Dash for KidsOut:** Collecting as many toys as possible at a toy fair and donating them to KidsOut.
- **Volunteering at an Army Camp:** Assisting with animal care and gardening.
- **Cooking for People in Need:** Preparing meals while promoting the message of reducing food waste, with 25kg of food saved from waste.



Bulgaria

In Sofia, the team has actively engaged with the local community through various initiatives aimed at making a positive impact. These activities include tree planting with local charities, and some colleagues are even planning to run a marathon to raise funds for charitable causes.

Germany

Our Frankfurt team has also volunteered for a litter pick, focusing on a riverbank where many cigarette butts were found. While small, cigarette butts are extremely harmful to the environment, particularly to waterways, where they can release toxic chemicals and contribute to pollution. Our Munich team partnered with EMC Munich to plant trees in the Bavarian Forest. The team is committed to supporting this initiative by pledging to plant a designated number of trees, contributing to the restoration and preservation of the forest.



2023 Emissions Summary

Scope	Emission Source	2023 (tCO2e)	2022 (tCO2e)	2021 (tCO2e)	2019 (tCO2e)	Change % (2023 vs 2019)
1	Natural Gas	-	-	4	11	-100%
1	Other Fuels	79	2	2	Not Reported	N/A
1	Company/Owned Leased Vehicles	3	4	11	13	-78%
1	Refrigerants and Other Fugitive Emissions	-	209	-	Not Reported	N/A
2	Electricity (location based)	8,877	11,233	8,833	13,104	-32%
2	Electricity (market based)	31	357	3,812	4,191	-99%
3	Purchased Goods and Services	46,734	31,021	38,947	34,538	35%
3	Capital Goods	5,902	1,769	8,021	5,095	16%
3	Fuel And Energy Related Activities	2,609	2,542	2,729	2,531	3%
3	Upstream Transportation and Distribution	16	51	4,656	2,132	-99%
3	Waste Generated in Operations	36	32	20	11	235%
3	Business Travel	28	14	1	944	-97%
3	Employee Commuting and Working From Home	301	344	246	184	64%
3	Upstream Leased Assets	5,230	3,122	3,680	10,695	-51%
3	Downstream Leased Assets	53	48	67	34	54%
	Totals	61,023	39,515	62,196	60,380	1%

Emissions for 2021 and 2022 are greyed out due to the methodology incomparability to 2019

Sustainability KPI Tracker

Sustainability Indicators		Topics	Metric	2023	2022 (3)	2021 (2)	2019 (1)	Change over 2019 (%)
Finance	Finance	Revenue	€M	242	214	193	167	44%
		Book Value of Equity	€M	559	728	702	850	-34%
		Book Value of Debt	€M	831	660	608	503	65%
	Sustainability Linked Loan	Environmental KPI - 98% renewable en- ergy by Year End 2023	%	99	82	N/A	N/A	N/A
		Social KPI - 27.2% of workforce to be women by Year End 2023	%	27	26	N/A	N/A	N/A
Greenhouse Gas Emissions	GHG Emissions	Scope 1 Emissions	tCO2e	82	227	16	24	241%
		Scope 2 Emissions - Market Based	tCO2e	31	357	3812	4,191	-99%
		Scope 2 Emissions - Location Based	tCO2e	8,876	11,223	8,833	13,104	-32%
		Scope 3 Emissions	tCO2e	60,910	37,385	57,538	56,165	8%
		Total Emissions	tCO2e	61,023	37,969	61,366	60,380	1%
	GHG Intensity	GHG Intensity - revenue	tCO2e/€M	252	176	316	360	-30%
		GHG Intensity - (Total Emissions / (Book Value of Equity + Net Debt))	tCO2e/€M	43	27	46	44	-1%
Greenhouse Gas Policy	Reduction in Carbon Emissions	Paris Agreement aligned Business Plan	Y/N	Yes	Yes	Yes	Yes	N/A
		Net Zero Commitment	Y/N	Yes	Yes	Yes	Yes	N/A
		Interim Target for carbon reductions	Y/N	Yes	Yes	Yes	Yes	N/A



Sustainability KPI Tracker

Sustainability Indicators		Topics	Metric	2023	2022 (3)	2021 (2)	2019 (1)	Change over 2019 (%)
Finance	Energy Consumption	Renewable Energy Consumption	KWh	27,003,725	28,155,423	12,627,086	13,217,384	104.3%
		Solar Energy Consumption	KWh	240,260	N/A	N/A	N/A	N/A
		Wind Energy Consumption	KWh	14,147,194	N/A	N/A	N/A	N/A
		Hydroelectric Consumption	KWh	12,616,270	N/A	N/A	N/A	N/A
		Non Renewable Energy Consumption	KWh	86,303	334,334	12,131,907	16,822,126	-99.5%
		Total Energy Consumption	KWh	27,090,028	28,489,757	24,758,994	30,039,511	-9.8%
		Share of Renewable Energy Consumption	%	99%	98%	51%	44%	126.5%
	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 (4)	Y/N	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	No	No	N/A



Sustainability KPI Tracker

Sustainability Indicators		Topics	Metric	2023	2022 (3)	2021 (2)	2019 (1)	Change over 2019 (%)
Biodiversity	Biodiversity	Negative effects on biodiversity	Y/N	No	No	No	No	N/A
Waste	Hazardous Waste	Tonnes of hazardous waste	Tonnes	N/A	N/A	N/A	N/A	N/A
Fuels	Fossil Fuel Exposure	Activity in the fossil fuel sector	Y/N	No	No	No	No	N/A
People	Employees	Number of employees	Number	341	348	369	302	12%
		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	%	27.6	26.3	25.3	24.2	14.0%
		Board gender diversity (women)	%	33.0	33.0	33.0	0	0%
		Leadership Team gender diversity (women)	%	44.0	22.0	22.0	0	0%
		Unadjusted gender pay gap (5)	%	N/A	N/A	N/A	N/A	N/A
UN Global Compact	Compliance	Signatory to the UN Global Compact	%	Yes	Yes	No	No	N/A
	Violations	Occurrences of violations to the UN Global Compact	Number	0	0	0	0	N/A
Human Rights	Human Rights Policy	Human Rights policy available	Y/N	Yes	Yes	No	No	N/A
	Anti-Bribery	Occurrences of activities associated with anti-bribery	Number	0	0	0	0	N/A



Sustainability KPI Tracker

Sustainability Indicators		Topics	Metric	2023	2022 (3)	2021 (2)	2019 (1)	Change over 2019 (%)
	Controversial Weapons	Exposure to controversial weapons	Y/N	No	No	No	No	N/A
Security	Data Security	Training	Y/N	Yes	Yes	Yes	Yes	N/A
		Certifications (6)	Y/N	Yes	Yes	Yes	Yes	N/A
		Incidents	Y/N	No	No	No	No	N/A
TCFD	Transitional Risk	Identification and Assessment (7)	Y/N	Yes	Yes	No	No	N/A
	Climate Physical Risk	Identification and Assessment (8)	Y/N	Yes	Yes	Yes	No	N/A
ESG Policies	ESG Standards	Signatories to ESG related standards	Y/N	Yes	Yes	Yes	Yes	N/A
	Health and Safety	Implementation of a health and safety policy	Y/N	Yes	Yes	Yes	Yes	N/A
	Other Policies	Other ESG related policies	Y/N	Yes	Yes	Yes	Yes	N/A
Suppliers	Policies	Commitment to Supplier Code of Conducts from stakeholders	Y/N	Yes	Yes	Yes	Yes	N/A
	Supply Chain Impact	Significant actual and potential negative environmental impacts from suppliers	Y/N	No	No	No	No	N/A
		Significant actual and potential negative social impacts from suppliers	Y/N	No	No	No	No	N/A
Business	Business Impact	Significant actual and potential negative environmental impacts as a business	Y/N	No	No	No	No	N/A

Sustainability KPI Tracker

Sustainability Indicators		Topics	Metric	2023	2022 (3)	2021 (2)	2019 (1)	Change over 2019 (%)
		Significant actual and potential negative social impacts as a business	Y/N	No	No	No	No	N/A
NACE Code	Nace Code	Nace Code	Number	61.9	61.9	61.9	61.9	N/A

(1) 2019 GHG emissions have been rebaselined

(2) (3) Emissions for 2021 and 2022 are greyed out due to the methodology incomparability to 2019

(4) Water utilised within office spaces and data centres for sanitary purposes

(5) Under HR investigation

(6) <https://eunetworks.com/iso27001/>

(7) (8) 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. (1) 2019 GHG emissions have been rebaselined

(2) (3) Emissions for 2021 and 2022 are greyed out due to the methodology incomparability to 2019

(4) Water utilised within office spaces and data centres for sanitary purposes

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(7) (8) 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.

Sustainability Commitments and Accomplishments

Year	Commitments & Accomplishments
2010	Anti Harassment and Bullying Policy Implementation
2010	Business Ethics Policy Implementation
2015	Publication of the first Anti-Modern Slavery Statement
2020	ISO 27001 Data Security Certification
Jun-21	Establishing 2019 as a baseline year for carbon reporting (Scopes 1, 2 and 3)
Oct-21	Science Based Targets initiative Business Ambition for 1.5°C Commitment
Nov-21	Graded 'D' (Disclosure) by the CDP
Dec-21	Sustainability Linked Loan secured
Feb-22	Climate Pledge signed
Feb-22	Committed to Net Zero by 2040
Feb-22	Member of the SME Climate Hub
Mar-22	Science Based Targets (SBTs) validated by Science Based Target Initiative (SBTi)
Mar-22	UN Global Compact Participant
May-22	Showstopper of the Year - Strides in Sustainability Award from Microsoft
Sep-22	Shortlisted for Best ESG Initiative by Global Carrier Awards 2022
Nov-22	Graded 'B' (Management) by the CDP

Year	Commitments & Accomplishments
Feb-23	Completed the SDG Ambition Accelerator (UN Global Compact programme)
Aug-23	Sustainability Policy released
Aug-23	Updated Supplier Code of Conduct released
Oct-23	Winner of Best ESG Initiative at Global Carrier Awards 2023
Dec-23	Updated Environmental SLL Environmental Benchmark Targets
Feb-24	Graded 'B' (Management) by the CDP
Jun-24	ESOS Assessment of UK Based Assets
Sep-24	Nomination for DQS Sustainability Heroes Awards
Oct-24	Featured at Microsoft's Supplier Sustainability Summit, showcasing euNetworks' commitment to sustainability and inspiring industry leadership



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: 97524.1 Gj 2. Percentage grid electricity: 0.3% 3. Percentage renewable: In 2023, euNetworks purchased 99.7% 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.



Mandatory and Voluntary Disclosures aligned with SASB

SASB TOPIC/CODE	ACCOUNTING METRIC	DISCLOSURE
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	<ul style="list-style-type: none">• 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 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.
Product end-of-life management		
TC-TL-440a.1	1. Materials recovered through take back programs, percentage of recovered materials that were 2. reused, 3. recycled, and 4. landfilled	euNetworks’ take back programs are being developed; current metrics are not material.



Mandatory and Voluntary Disclosures aligned with SASB

SASB TOPIC/CODE	ACCOUNTING METRIC	DISCLOSURE
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	Average actual sustained download speed of 1. owned and commercially-associated content and 2. non-associated content	euNetworks does not differentiate between the two types of content identified in the standard. 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.
TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating, and related practices	For information on this topic, see euNetworks’ Internet peering policy at https://peering.eunetworks.com/ . euNetworks’ peering location details could be viewed on www.peeringdb.com . In addition, euNetworks is a heavy user of route servers on commercial Internet exchanges that provide free Internet peering connectivity to its members. euNetworks’ Internet network does not apply any content filters or rate limiting and all Internet traffic is treated alike.



Mandatory and Voluntary Disclosures aligned with SASB

SASB TOPIC/CODE	ACCOUNTING METRIC	DISCLOSURE
Managing systemic risks from technology disruptions		
TC-TL-550a.1	1. System average interruption frequency and 2. Customer average interruption duration	1. Under evaluation for future reporting. 2. euNetworks does not report on customer average interruption duration. Service Availabiltiy is a main metric used to measure performance, which is on average above industry standard.
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. 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>



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