# Connected for Impact - Building the Backbone of Europe's Digital Future

Planet, People, Prosperity, and Partnerships

2025 Sustainability Report

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# A Message from Our CEO

**Since stepping into euNetworks as CEO earlier this year, I've been struck by the strength of purpose that runs through this company.**

Sustainability has long been part of how euNetworks grows. Today it's embedded even more deeply – in our decisions, our partnerships, and our values. We're building infrastructure that's not only scalable and intelligent, but sustainable at its core.
We know the challenges ahead and recognise that decarbonising our supply chain will take time, collaboration, and persistence. Yet our ambition remains clear: to reduce our emissions, expand responsibly, and lead with transparency. Our people and partners drive this progress.

Their integrity, innovation, and commitment to doing the right thing define who we are and the impact we create together.

At euNetworks, we're connected for impact – pioneering Europe's bandwidth infrastructure in a way that leaves the world stronger for the connections we make.

**Marisa Trisolino**
Chief Executive Officer

# Building Europe's Sustainable Bandwidth Future Through Partnership and Accountability

At euNetworks, sustainability is built into how we grow. It shapes our business model, our financing and our relationships with customers and partners.

Since launching our Sustainability-Linked Loan in 2021 and expanding it in 2024, we have strengthened the link between growth and responsibility. The loan holds us accountable for real outcomes on emissions and diversity, keeping sustainability at the centre of how we plan and perform.

Progress is not always linear. We have kept Scope 1 and 2 emissions close to zero, but Scope 3 remains the hardest challenge for us and for the industry. As our network expands, so does our responsibility.

Working more closely with suppliers, improving data and focusing on practical decarbonisation will make the biggest difference over time.

We're making strong progress with our social targets, having exceeded our 2024 KPI for women in the workforce and remain on track for our 2026 target.

We will stay focused on what matters most: transparency, collaboration and continuous improvement. Sustainability is not a goal that we achieve once - it's part of every connection we make.

**Richard Taylor**
General Counsel & Chief Corporate Officer

# Moving Forward with Purpose: Building Sustainable Impact Together

## Planet
Leading environmental accountability

## Ambition
Net-zero carbon commitment by 2040

### Milestones

**1** SBTi Target: Reduce emissions across Scopes 1, 2, and 3 by 62% by 2030 from our 2019 baseline[2].

**2** Microsoft Partnership Goal: Achieve a 55% reduction in Microsoft-specific emissions across all scopes by 2030.

**3** Supplier Engagement & Enablement: Continue building stronger, more responsible supply chains - driving shared progress and accountability.

### KPIs[1]

- Set 1.5°C-aligned Science Based Targets, validated by the SBTi (2021).
- Signed The Climate Pledge, committing to net-zero carbon by 2040 (2022).
- Empowered customers with supplier-specific emissions data through our Network Construction Carbon Calculator and Carbon by Service Calculator (2022 ongoing).
- Reached 99.6% renewable energy for our own operations (Scope 2).
- Significantly reduced Scope 1 and 2 emissions, with Scope 3 now accounting for 99.7% of our total footprint.
- Actively engaging priority suppliers responsible for over 75% of Scope 3 emissions, driving collaboration and transparency.

### Recognition[1]

- Winner: Showstopper of the Year – Strides in Sustainability, Microsoft Supplier Prestige Awards (2022).
- Winner: Best ESG Initiative, Global Carrier Awards (2023).
- Featured: Microsoft Supplier Summit 2024 - spotlighting our leadership and inspiring others across the industry.
- Nominee: Carbon Footprint category, Sustainability Heroes Awards 2024.

[1]Refers to 2024, unless otherwise stated

[2]2019 base year was re-baselined, due to methodology changes

# Moving Forward with Purpose: Building Sustainable Impact Together

## 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** Gender Diversity Target: Reach 30% women in our workforce by 2026.

### KPIs[1]

- Established 7 company-wide DE&I ambitions, focused on growth, community, and talent development (2023).
- 37% of our Executive Leadership Team and 33% of our Board of Directors were women.
- 28.7% women in our workforce as of December 2024 - moving steadily toward our 2026 goals.
- GDPR compliant and certified to ISO 27001, ensuring data security and trust.
- Achieved a 95% success rate in our Apprenticeship Programme, nurturing the next generation of talent.

### Initiatives[1]

- Created "You Belong Here" employee-led groups to foster inclusion, connection, and belonging (2021).
- Rolled out a company-wide Mental Health & Wellbeing Programme, offering support for every employee (2022).
- Launched an Accessibility Passport to ensure personalised support for employees with accessibility needs (2023).

[1]Refers to 2024, unless otherwise stated

**3** GOOD HEALTH AND WELL-BEING    **4** QUALITY EDUCATION    **5** GENDER EQUALITY    **8** DECENT WORK AND ECONOMIC GROWTH    **10** REDUCED INEQUALITIES    **16** PEACE, JUSTICE AND STRONG INSTITUTIONS

# Moving Forward with Purpose: Building Sustainable Impact Together

## Prosperity
Igniting sustainable growth

## Ambition
Blend financial growth with ESG commitments

### Milestones

**1** Climate Risk Integration: Incorporating climate-related risks into financial statements to align sustainability with performance.

**2** Vendor Governance: Advancing due diligence policies to strengthen transparency and resilience across our supply chain.

### KPIs[1]

• Maintained a zero-accident record with no safety-related fatalities across own employees and contractors (ongoing).

• Established a Sustainability Governance Structure comprising a Board Sustainability Committee and internal Sustainability Steering Committee to oversee progress (2023).

• Scored 'B' ("Management") in the CDP 2023 assessment, recognising strong environmental management.

• Awarded an 'A' by the CDP Supplier Engagement Assessment (SEA) for leadership in supplier collaboration.

• Exceeded our SLL social target with 28.7% women representation, surpassing the 2024 goal of 28.1%.

### Policies & Practices[1]

• Published a new Sustainability Policy (2023).

• Updated our Global Health & Safety Policy (2023).

• Updated our Supplier Code of Conduct (2023).

• Completed the UNGC SDG Accelerator, advancing our contribution toward the UN Sustainable Development Goals by 2030 (2023).

[1]Refers to 2024, unless otherwise stated

# Moving Forward with Purpose: Building Sustainable Impact Together

## Partnerships
Cultivating responsible partnerships

## Ambition
Sustainable collaborations, maximised impact

## Milestones

**1** Biodiversity Collaboration: Partnering with The Response, South East Rivers Trust and DC for Bees to restore ecosystems and protect natural habitats.

**2** Sustainable Procurement: Embedding sustainability criteria into our RFP process to drive responsible partnerships.

## Achievements[1]

- Secured strong employee participation in volunteering and social impact programmes (ongoing).
- LDN Apprenticeships partnership (since 2013), with 39 apprentices successfully completing the programme (ongoing).
- Published a group-wide Volunteering Policy, empowering employees to support community and charitable initiatives (2023).
- Engaged suppliers to drive joint carbon reduction initiatives across our value chain (2023 ongoing).

[1]Refers to 2024, unless otherwise stated

4 QUALITY EDUCATION | 8 DECENT WORK AND ECONOMIC GROWTH | 11 SUSTAINABLE CITIES AND COMMUNITIES | 12 RESPONSIBLE CONSUMPTION AND PRODUCTION | 13 CLIMATE ACTION | 17 PARTNERSHIPS FOR THE GOALS
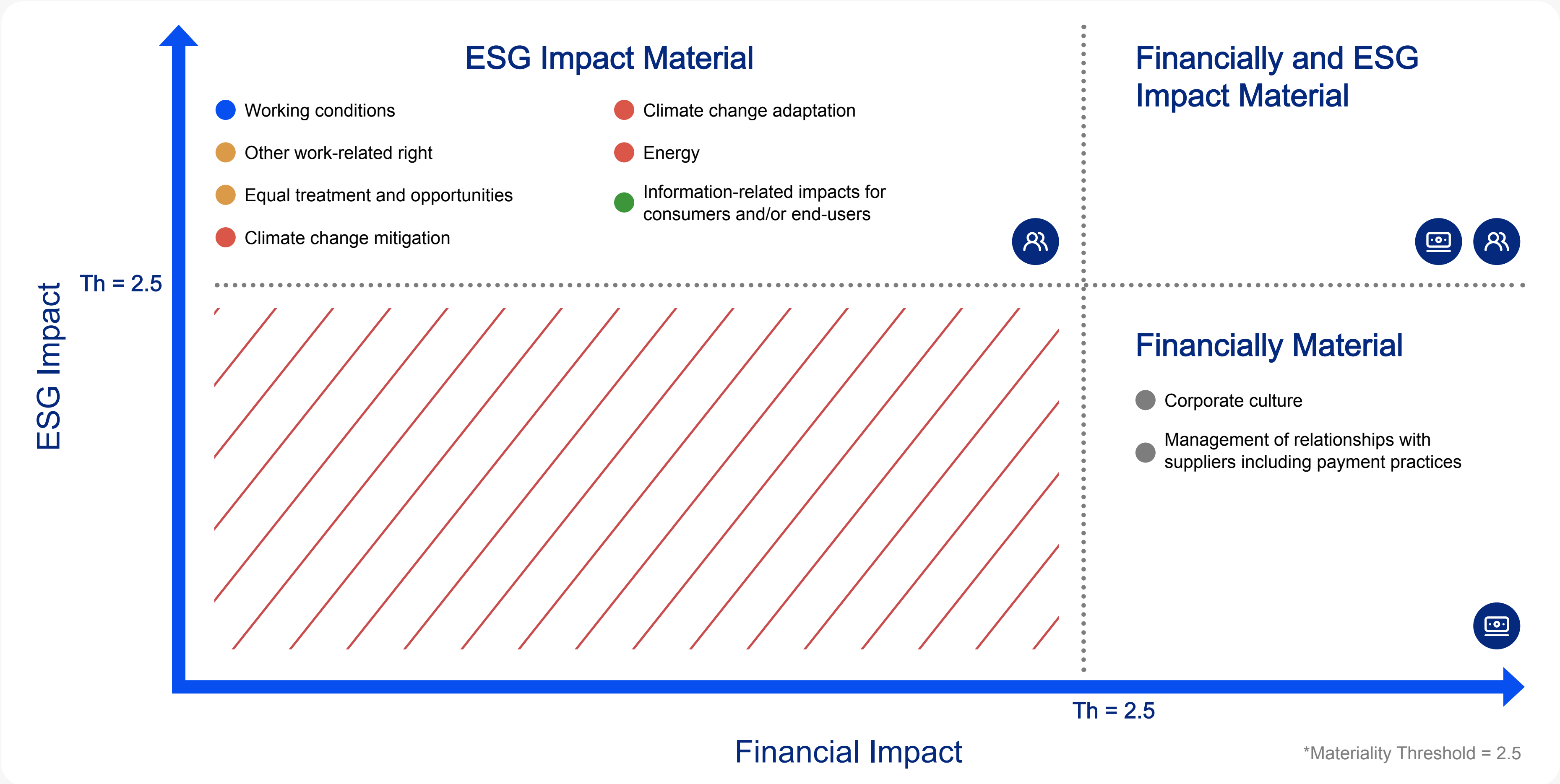
# ESG Materiality Matrix

As part of our CSRD readiness, we completed a Double Materiality Assessment (DMA) to identify the ESG topics that matter most - to our business, our stakeholders, and the world around us.

The assessment looked both ways:

- Inside-out, understanding our impact on society and the environment.
- Outside-in, assessing the financial and risk implications for our business.

This process brings clarity, structure, and transparency to how we prioritise ESG issues. It ensures we manage them proactively as our business and the regulatory landscape evolve. The outcomes of the DMA shape our sustainability strategy and guide our future ESG reporting. We stay engaged with stakeholders year-round - listening, sharing progress, and collaborating to spark innovation and deliver meaningful, sustainable change.

Our goal is clear: to grow responsibly, create positive impact, and build long-term value for customers, investors, and society. The visualisation below highlights the ESG topics that matter most to our business and stakeholders.

**ESG Impact Material**

- Working conditions
- Other work-related right
- Equal treatment and opportunities
- Climate change mitigation
- Climate change adaptation
- Energy
- Information-related impacts for consumers and/or end-users

**Financially and ESG Impact Material**

**Financially Material**

- Corporate culture
- Management of relationships with suppliers including payment practices

Th = 2.5

Th = 2.5

ESG Impact

Financial Impact

*Materiality Threshold = 2.5

# Our Double Materiality Approach:

We took a structured, data-driven approach to understand what truly matters for euNetworks and our stakeholders. This involved:

- Mapping our value chain - identifying key sustainability activities, relationships, and stakeholder groups across all business lines.
- Applying  AI-enabled analysis and internal expertise to identify and validate a comprehensive list of ESG impacts, risks, and opportunities (IROs) across all ESRS topics.
- Engaging stakeholders to refine this list and create a focused, relevant shortlist of priorities.
- Quantitatively assessing each IRO, scoring its sustainability impact and financial materiality to determine the most material topics.
- Evaluating data readiness and identifying disclosure gaps against CSRD requirements - developing a clear roadmap and governance framework for audit-ready compliance and continuous improvement.

Through this process, 274 IROs were identified and assessed across 27 sub-topics within the Environmental, Social, and Governance pillars. After detailed scoring and validation, nine sub-topics and five topics were defined as material to euNetworks, with a materiality threshold of 2.5 for both ESG and Financial Impact.

## 274

IROs were identified and assessed across 27 sub-topics within the Environmental, Social, and Governance pillars.

## Our Material ESG Topics:

Working conditions

Other work-related rights

Equal treatment and opportunities

Climate change mitigation

Climate change adaptation

Energy

Information-related impacts for consumers and/or end-users

Corporate culture

Management of relationships with suppliers including payment practices

# Planet

## In this section

# Carbon Footprint

The demand for sustainable bandwidth has never been greater, with connectivity playing a central role in modern economies and societies.

At euNetworks, we aim to reduce our carbon footprint while meeting customer demand for high-performance networks.

Our commitment is clear: reduce our carbon footprint while delivering the performance our customers trust us for.

2024 marks five years since we began tracking our greenhouse gas emissions across Scopes 1, 2, and 3. Each year, we've refined our approach, moving from broad estimates to supplier-specific data that gives us sharper insight and drives smarter action.

Progress depends on partnership - we work closely with our suppliers to decarbonise our shared value chain, adopting low-carbon materials, cleaner construction, and more

efficient network technologies. Together, we set higher standards not just for compliance, but for real, measurable change.

And it's working. Our total carbon footprint is down 8% from 2023 and 7% lower than our 2019 baseline, which is driven by continuous improvements in how we build, source, and power our network.

| Scope Totals | Baseline (2019) Emissions | 2024 Emissions | Variance from baseline (%) |
|---|---|---|---|
| Scope 1 | 24 | 76 | 217% |
| Scope 2 | 4,191 | 84 | -98% |
| Scope 3 | 56,165 | 55,914 | -0.4% |
| Totals | 60,380 | 56,074 | -7% |

**8%**
Reduction in total carbon footprint compared to 2023

**7%**
Overall reduction compared to our 2019 baseline levels

# Our Carbon Progress

## Scope 2

Our energy transition tells the story best: Scope 2 emissions have fallen by 98% since 2019, reflecting our decisive shift to renewable electricity. Almost all of our operations now run on clean power, one of the significant steps toward Net-zero.
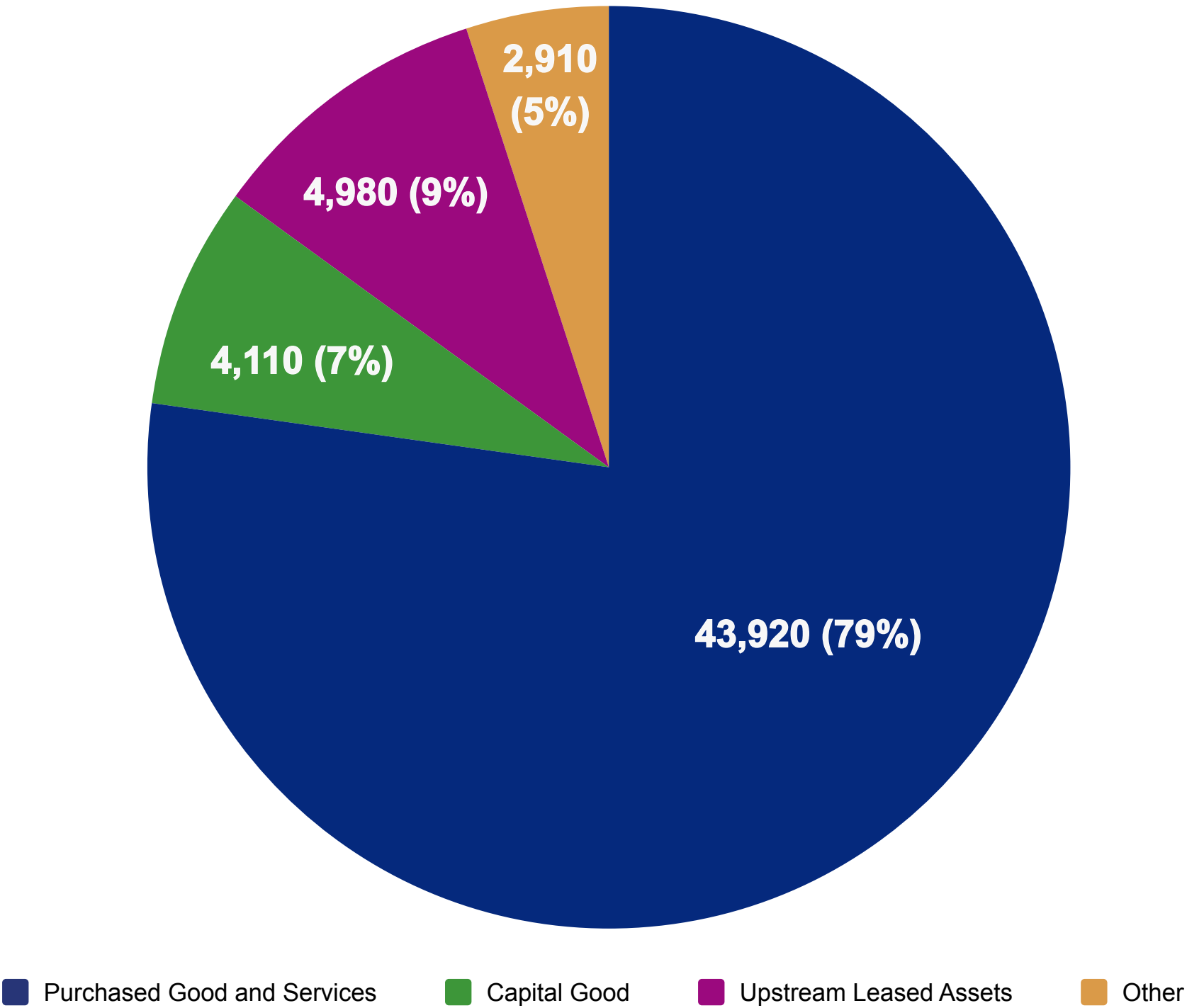
## Scope 3

Purchased goods and services remain our largest source of emissions - 78% of our total footprint. Emissions in this category are 6% lower than in 2023, driven by closer collaboration with suppliers and a stronger focus on sustainable procurement. Together, we're sourcing smarter, designing better, and reducing impact across the value chain.

Capital goods emissions have fallen 30% year on year and are 19% lower than in 2019. Better data is driving smarter action - enabling targeted decarbonisation where it matters most.

For upstream leased assets, emissions have dropped 53% since our baseline, powered by greater use of renewable energy across third-party sites. Each partnership, each data point, and each transition strengthens our collective impact.

Business travel-related emissions have increased as teams returned to in-person collaboration. Travel-related emissions rose 850% from 2023 - yet remain 71% below 2019 levels. It's a shift toward intentional connection: valuing the energy of face-to-face engagement while staying disciplined about when and how we travel.

### Scope 3 Emissions (tCO2e)

2,910 (5%)
4,980 (9%)
4,110 (7%)
43,920 (79%)

■ Purchased Good and Services   ■ Capital Good   ■ Upstream Leased Assets   ■ Other

* Other: Fuel and Energy Related Activities, Upstream Transportation and Distribution, Waste, Business Travel, Employee Commuting, Downstream Leased Assets

# Overall Commitment

We reduced total emissions by 8% in 2024. However, we are not yet on track to meet our Science Based Target (SBT) due to market constraints in sustainable materials.

Scope 3 emissions remain the most challenging to reduce, especially as our business grows. The market for sustainable materials and low-carbon construction isn't moving as fast as we are. Our suppliers are stepping up and showing real commitment, but they can only go as far as the market allows. Innovation in materials and technologies is still catching up - and that slows the pace of decarbonisation, particularly for large-scale, high-impact build projects.

Not meeting our SBT also affects one of the KPIs within our sustainability-linked financing, which was set up to fuel our growth and investment.

That adds pressure - and purpose. It keeps us focused on driving change, investing in better data, and finding practical ways to cut emissions where it counts.

We'll keep pushing forward to overcome these challenges  with ambition, collaboration, and a clear view of the future we're building.



We reduced total emissions by 8% in 2024.

# Innovation and Carbon Transparency

At euNetworks, innovation powers our sustainability journey - helping us deliver smarter solutions and deeper value for our customers.

By listening to our customers and understanding their decarbonisation challenges, we're automating emissions reporting to improve accuracy, align with regulatory standards, and support customer disclosure needs.

In 2023, we launched the Carbon by Service Calculator, giving customers clear insight into the emissions linked to each of our services.

Using a full life cycle assessment, it identifies key drivers and hotspots - enabling better decisions for us and for them. It also opens up meaningful conversations about impact, collaboration, and shared responsibility for change.

Now, we're taking it further.
The calculator is being integrated directly into our core data systems, automating emissions reporting and improving both speed and accuracy.

This strengthens our relationships with customers, aligns with reporting requirements, and reinforces our ambition to embed sustainability into every service we deliver.

- What: We're automating service-based emissions calculations for customers.
- Why: To streamline processes, eliminate manual work, and deliver faster, more accurate data.
- How: By mapping key data points and embedding them directly into our systems with support from internal teams and external experts.

Our goal is clear: give customers full visibility of their emissions from euNetworks services - tracked, reported, and forecast through our customer portal. Emissions data will be available when new services are ordered or reviewed annually for ongoing services.

In the long term, this will enable transparent, service-based reporting that helps customers meet their own decarbonisation goals and builds stronger partnerships founded on trust, accountability, and shared progress towards Net-zero.

# Sustainable Network Development - Super Highways

At the end of 2024, euNetworks delivered three new Super Highways, extending our long-haul network with greater efficiency and lower impact.

By deploying brand-new dark fibre, we delivered faster, more resilient connectivity while reducing the carbon footprint of the network routes.

Alongside these efficiency gains, we faced biodiversity challenges during construction. In several areas, species such as toads and other local wildlife were identified along the routes. We adapted our construction methods, working closely with suppliers to preserve habitats and protect local species.

To track and reduce construction emissions, we use our Network Construction Carbon Calculator - identifying opportunities to use more sustainable materials and fuels across every build. These routes demonstrate improved efficiency and lower emissions through fibre optimisation and site consolidation.
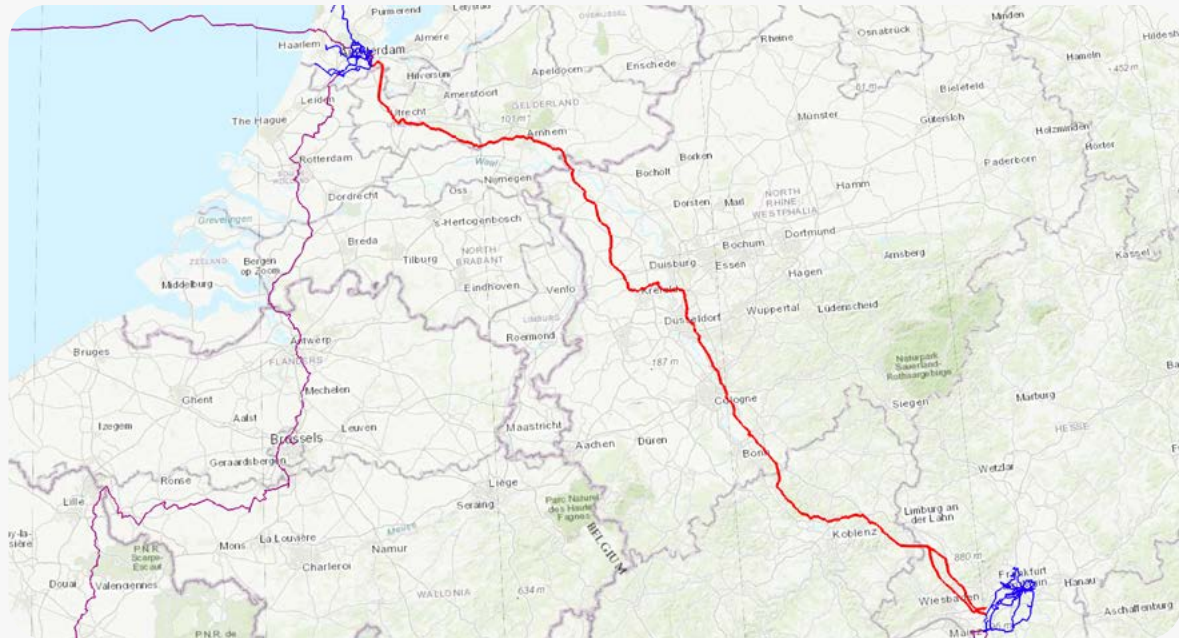


### Amsterdam to Frankfurt

This route connects multiple metro networks through a shorter, more direct path, avoiding capacity bottlenecks. Less distance means less bandwidth travel - lowering energy use and reducing emissions. With newer, low-loss fibre, we deliver more capacity using less power.
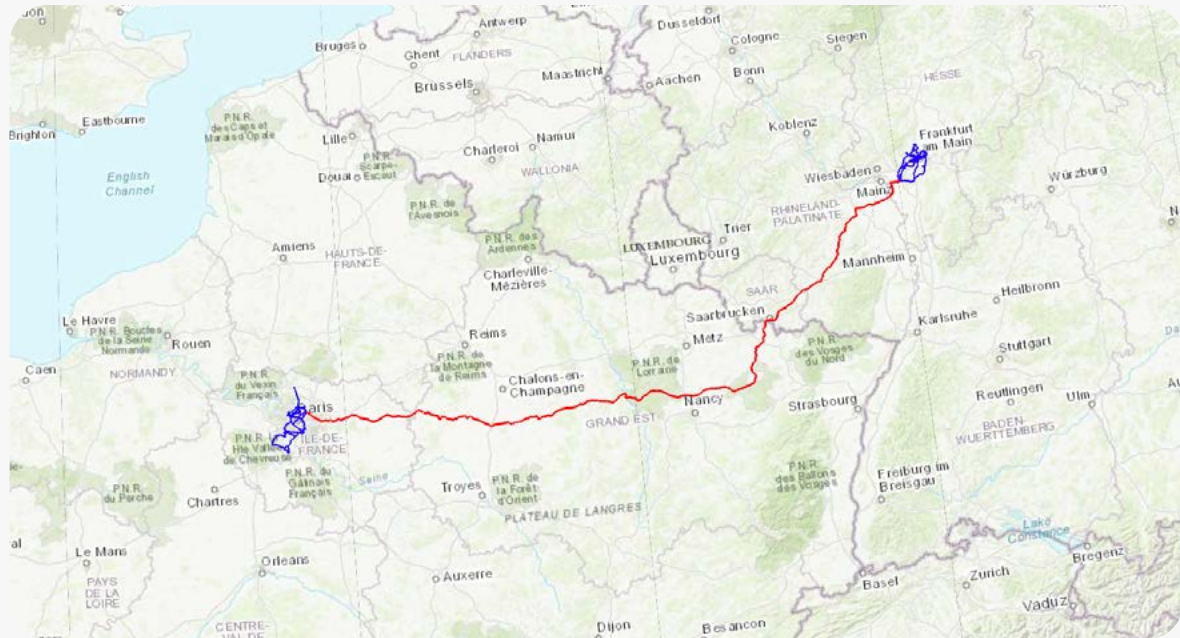


### Paris to Frankfurt

A more direct route that bypasses busy corridors, improving resilience, reliability, and latency. Using high-efficiency fibre, we increased bandwidth per fibre pair and reduced overall power demand - directly cutting service-related emissions.
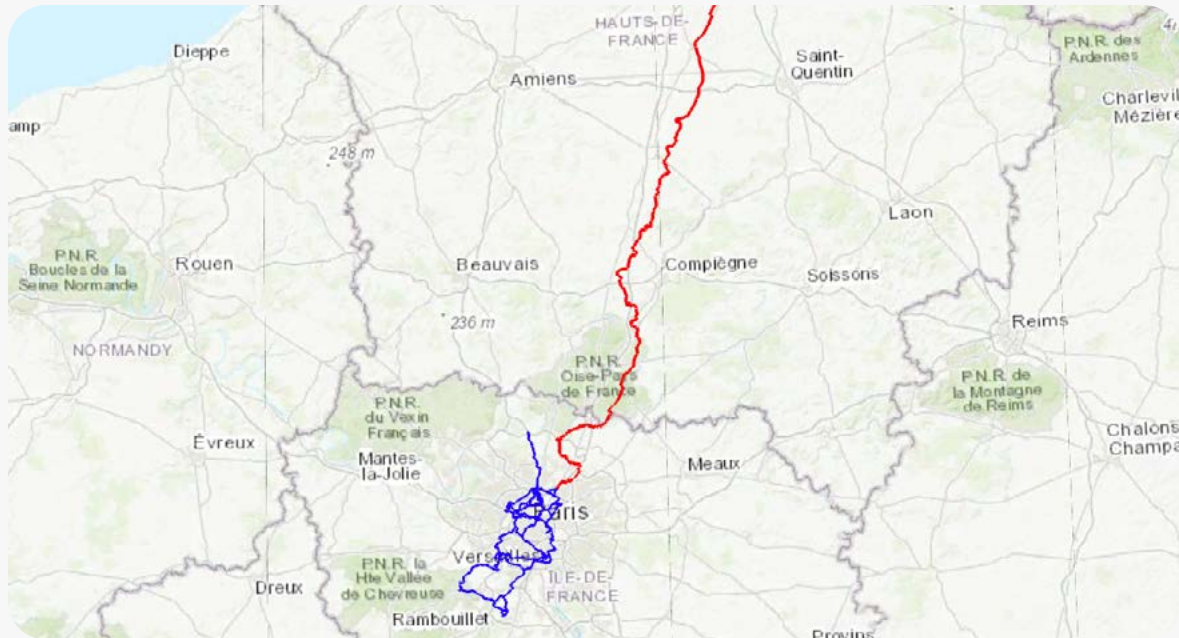


### Paris to Lille

The first span of a larger route connecting into Amsterdam and leveraging our assets in Brussels to strengthen regional networks. With 1,660 km of unique fibre now across Belgium, we provide capacity without overloading city infrastructure. Using the latest fibre technology, we spaced ILAs further apart, requiring fewer sites and less power - further reducing emissions.

# Operational Energy - Striving for Renewables and Efficiency

While Scope 3 emissions remain the most complex to reduce, euNetworks began decarbonisation by tackling the areas fully within our operational control.

Energy sits at the heart of our business, powering every bandwidth solution we deliver. We started by measuring energy use across our owned sites - and acting fast. Today, our colocation centres, data centres, in-line amplifiers (ILAs), cable landing stations (CLSs), and most offices run on 100% renewable energy, driving a 99% reduction in Scope 2 emissions since our baseline year.

Since introducing our Sustainability Linked Loan, we've consistently exceeded our renewable energy procurement targets.

While our own operations are under control, the next challenge lies in third-party energy use. In 2024, emissions from third-party sites fell 53% from the baseline, mainly due to suppliers switching to renewables. Many of the data centres we connect into already run on 100% renewable energy, and we continue to work closely with the remaining partners to accelerate their transition - overcoming barriers of cost, geography, and availability.

Beyond renewables, we're focused on energy efficiency - large and small. From efficient lighting and screens in offices to energy-optimised equipment in datacentres and ILAs, every improvement counts. The deployment of new dark fibre on our Super Highways has allowed for wider ILA spacing, reducing energy demand. New ILAs are equipped with advanced air conditioning systems, using less power while maintaining optimal performance.

At euNetworks, we're committed to maximising efficiency across every part of our network - and powering progress with clean, renewable energy.

# People

## In this section

# Diversity, Equity and Inclusion

## Our people power our success. Diversity, equity, and inclusion (DE&I) aren't just commitments - they're how we grow stronger together.

Our DE&I strategy is built to create an inclusive culture that celebrates difference and drives belonging. It promotes inclusion and representation across all teams, with programmes like Girls in Tech and Pride Matters in Tech strengthening awareness and participation. These efforts align DE&I with our business goals - and they're shaping something bigger: a workplace where people thrive, and a community where everyone belongs.

## Driving Meaningful Change

### Representation

- 33% women on the Board of Directors
- 28.7% women in the workforce - 0.6% above 2024 KPI target
- Target: 30% women in the workforce by 2026

### Inclusion

- Eight You Belong Here groups: gender, sexuality, physical and mental health, regional inclusion
- Active supporter of Pride in Tech - strengthening the LGBTQ+ community

### Accountability

- One DE&I objective required in all employee performance goals
- Diverse hiring panels across recruitment processes DE&I statements included in all new job advertisements

## You Belong Here

At euNetworks, You Belong Here is more than a programme - it fosters inclusion through employee-led groups focused on gender, health, and regional engagement. It also creates spaces for employees to share, support, and drive change - within our company and beyond.

Through this initiative, we've built active communities: from our rainbow group, to networks empowering women, and groups supporting colleagues with physical and mental disabilities. Together, they foster belonging and ensure voice is heard.

We've extended the spirit externally - partnering with others to address key social issues and strengthen collective impact. Because when we lead with empathy and purpose, we build workplaces - and communities - where everyone truly belongs.

# London Pride - Shining our Rainbow Community

Over the past year, our Rainbow community has taken bold steps to create impact - from cross-industry collaboration to proudly marching at London Pride.

London Pride celebrates the diversity and strength of the LGBTQ+ community. What began as an act of solidarity has grown into a powerful celebration of freedom, identity, and inclusion - a reminder that progress is built on unity and courage.

Led by our Senior Director of Corporate Development, our participation brought together colleagues from across euNetworks. The day was filled with colour, energy, and connection - and the support from the public made it even more special.

Behind the celebration lies an important commitment to reducing divides, standing together, and ensuring everyone can be seen and heard.

London Pride reminded us what You Belong Here truly means - a community where diversity is celebrated, inclusion is lived, and everyone is free to be themselves.

## London Pride 2025 - By the numbers

### 1.5 million spectators
Celebrated across London, making Pride one of the city's largest annual events

### 100,000 attendees
Took part in London Trans+Pride 2025 (a record turnout)

### 35,000+ participants
Marchers, community groups and organisations joining the parade

### 3.8% of UK adults
Identify themselves as part of the LGBTQ+ community

### 10.4% of young adults (16-24)
Identify themselves as part of the LGBTQ+ community

# Sofia - Driving Diversity Forward

Our Sofia office has continued to grow and evolve over the past year - establishing itself as a dynamic and integral part of euNetworks.

### Team Growth

The team has expanded to 38 employees across NOC, Sales and Finance, reflecting both the increasing scope of our operations and our ongoing investment in local talent.

### New Office Space

We moved into a new office designed for collaboration, flexibility, and engagement - fully aligned with our hybrid work model and the way our teams connect.

### Talent and Development

Colleagues are taking on broader roles, supported by training, mentorship, and closer collaboration with international teams.

### Culture and Engagement

A strong focus on team spirit and belonging continues to define Sofia. Regular events and initiatives keep the team connected, engaged, and inspired.

### Wellbeing and Flexibility

Work-life balance remains central. Flexible options and a hybrid model ensure everyone can perform at their best - wherever they work.

### The results speak for themselves

The 2024 SLL KPI for women in the workforce is 28.1%, the Sofia office has already surpassed this and achieved 35.1% female representation, advancing our company-wide diversity goals, ahead of schedule.

# Data Security - Critical Standards

**euNetworks upholds the highest standards of data security to protect our business and our customers from cyber threats.**

Aligned with ISO 27001, we've established a comprehensive Information Security Management System (ISMS) that proactively monitors potential risks and drives continuous improvement. Regular internal and external audits ensure compliance and strengthen our security posture across all operations.

Recognising the growing link between climate and cyber resilience, we've also begun integrating climate-risk considerations into our ISMS. This includes assessing potential impacts on our assets, infrastructure, and financial exposure - safeguarding the confidentiality, integrity, and resilience of our fibre network, datacentres, and services. By logging and assessing climate-related risks within the ISMS, we demonstrate to regulators, investors, and customers the rigour of our due diligence and the strength of our operational resilience.

Alongside maintaining ISO 27001 certification, we've implemented a comprehensive business impact framework that defines safeguards, response measures, and recovery plans to defend against cyber attacks.

## Data Integrity

Data is the backbone of our business - and its quality and integrity matter. We're working cross-functionality to identify data challenges and deliver solutions that improve accuracy, accessibility, and efficiency across the company. High-quality data drives high-quality service - and our customers expect nothing less.

As we strengthen our data foundations, we're also reinforcing security and resilience. Recent global events have underscored the importance of protecting information, and we're ensuring every improvement we make is guided by safety, precision, and vigilance.
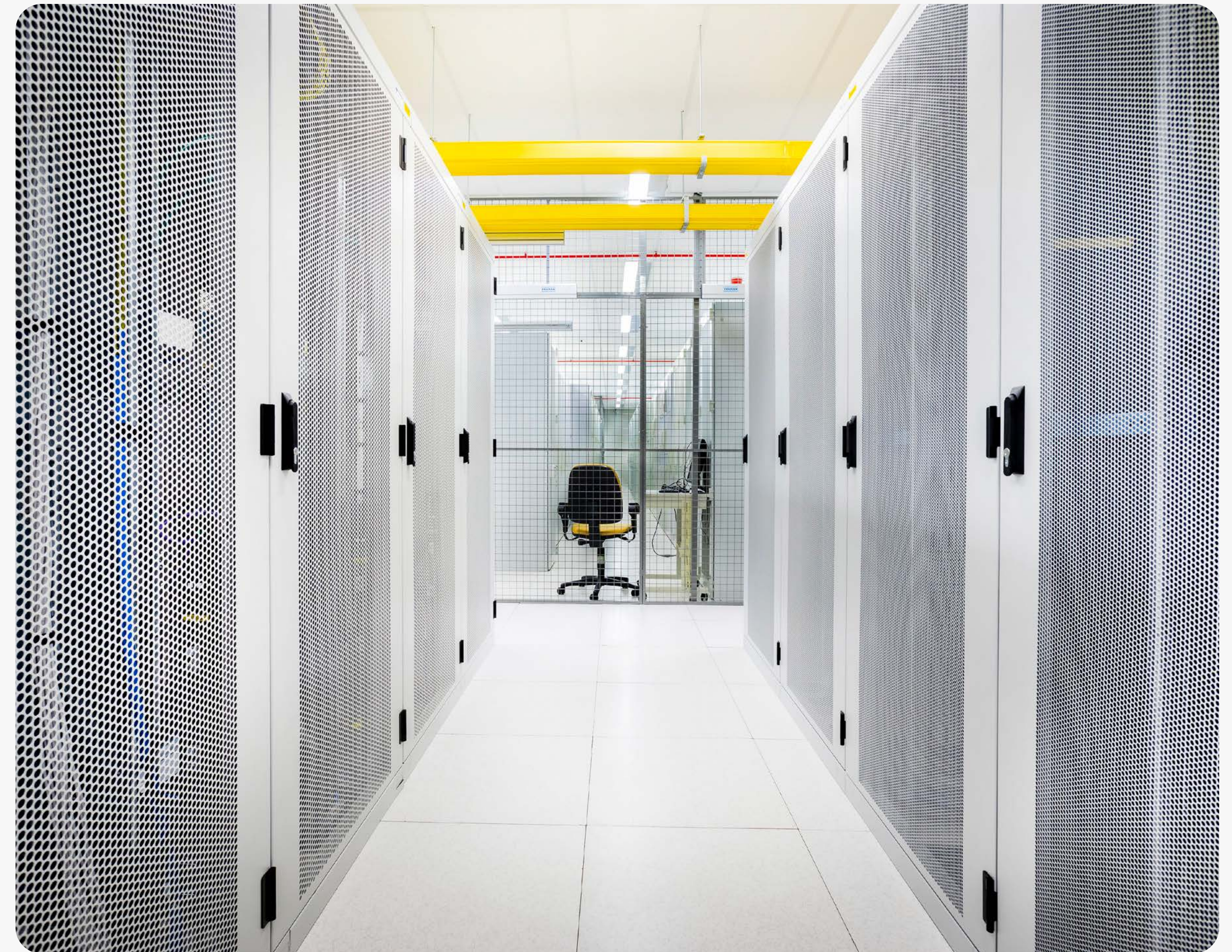
# Prosperity

## In this section

# Values

The entire euNetworks team is committed to our company values. They drive our behaviour and form the basis of how we operate our business.

**1**

Relentless Customer Obsession

**2**

Pioneering Innovation

**3**

Unbreakable Reliability and Security

**4**

Trusted Market Leader

**5**

Integrity In Action

**6**

Drive Impact

# Strategic Leadership

Sustainability is integrated into governance at euNetworks through Board and Steering Committees that oversee targets and performance. Our Board Sustainability Committee oversees our journey, keeping us focused on the bigger picture. They bring purpose to how we think, decide, and act - ensuring sustainability remains a core part of our strategy, differentiation, and direction.

Delivery sits with our Sustainability Steering Committee, which brings together representatives from across the business. This team ensures that initiatives are implemented effectively and aligned with our wider goals. With a focus on innovation and impact, they identify new opportunities for growth by viewing our business through a sustainability lens.

## Preventing Modern Slavery

We are firmly committed to combating slavery, human trafficking, and forced labour. Our Slavery and Human Trafficking Statement aligns with our Sustainability Policy, reinforcing our responsibility to protect human rights and uphold fairness and respect across every part of our value chain.

## Superior Code of Conduct

Our Supplier Code of Conduct strengthens collaboration with partners and aligns shared ESG objectives. We rely on the support and accountability of our suppliers to achieve our goals. Adherence to this code reflects a shared commitment to responsibility, transparency, and ethical growth.

## Global Health and Safety Policy

Our Global Health and Safety Policy provides a consistent, robust framework to protect the wellbeing of employees and contractors worldwide. It enhances project planning and ensures best practices across all operations.

## Sustainability Policy

Our Sustainability Policy anchors our commitment to address environmental, social, and governance topics across the business. We work closely with customers and partners to promote responsible practices throughout our industry. Guided by the Sustainability Steering Committee, this policy is now fully integrated into operations, with regular tracking to ensure progress toward our goals.

# Alliances and Disclosures

We engage through global reporting frameworks to benchmark and improve performance, and strengthen our sustainability strategy.

### CSRD

The Corporate Sustainability Reporting Directive (CSRD) introduces a stronger framework for transparent ESG reporting. 2024 marked euNetworks' first CSRD-aligned assessment, carried out with external consultants.

Through our Double Materiality Assessment (DMA), we identified the ESG topics most relevant to our business, evaluating impacts, risks, and opportunities across the environment, human rights, business ethics, and governance. The process included internal policy reviews, stakeholder scoring, validation, and independent audit - providing a structured roadmap for improvement and alignment with CSRD standards.

The Omnibus Package, introduced in February 2025, aims to simplify SME reporting, but the groundwork we've already built through our DMA and gap analysis has positioned euNetworks ahead - ready to meet evolving requirements with confidence.

### CDP

We continue to report through the CDP, sharing progress on emissions reduction, energy efficiency, and supply chain impact. In our latest 2024 disclosure (reporting year 2023), euNetworks achieved a 'B' (Management) rating - consistent with last year's result - and earned an 'A' in the Supplier Engagement Assessment, recognising our leadership in addressing climate challenges and driving impact across our value chain.

We're proud of these results - and clear on where to go next. Continuous improvement will keep us competitive and drive higher performance in the years ahead.

### GRESB

In 2025, euNetworks completed its first submission to GRESB, the global benchmark for ESG performance in real estate and infrastructure. Assessed across environmental, social, and governance factors, our results established a baseline for future progress, offering valuable insight into our current standing and clear direction for improvement.

### UN Global Compact

As a signatory of the UN Global Compact, we align our strategy with the Ten Principles covering human rights, labour, environment, and anti-corruption. Our participation in the UN SDG Accelerator reinforces our commitment to the UN Sustainable Development Goals (SDGs), helping accelerate progress toward the 2030 agenda and strengthening our contribution to global sustainability.

### SME Climate Hub

Since joining the SME Climate Hub in 2022, we've deepened our commitment to environmental responsibility. We've pledged to halve emissions by 2030 and reach Net-zero by 2040 - ten years ahead of the Paris Agreement. The SME Climate Hub provides tools and resources that guide us along this journey and align our actions with the Race to Net-zero.

# Funding Sustainable Business Growth

In December 2021, euNetworks refinanced its existing debt by securing €760 million in long-term infrastructure financing through a Sustainability-Linked Loan (SLL). In June 2024, we refinanced part of our existing sustainability-linked debt and secured additional committed facilities totalling €1.26 billion to fuel the next phase of our network expansion across Europe. This financing anchors our growth strategy: building bandwidth infrastructure for the future, while ensuring sustainability remains embedded in every decision we make.

**The SLL links performance directly to our ESG priorities, with interest margins tied to two key Sustainability Performance Targets (SPTs):**

• Environmental KPI: In 2024, our Environmental Sustainability Benchmark evolved from a renewable electricity (Scope 2) target to a broader, absolute emissions reduction target across Scopes 1, 2 and 3, aligned with our Science Based Target of a 62% reduction by 2030 from our 2019 baseline. We set this new benchmark knowing it would raise the bar - and it has. We didn't meet the target in its first year, driven by the scale, scope, and complexity of new network construction projects, the limited availability of low-carbon materials, and the slower adoption of greener practices across the market. Many suppliers and customers are willing to change, but face real barriers - from tight budgets to the higher cost of sustainable alternatives. It's a mix of challenges that takes time and collective effort to shift. While that affects our loan margin, it strengthens our resolve. We're using these insights to deepen engagement, push for innovation, and focus investment where the biggest reductions can be achieved.

• Social KPI: Focused on gender diversity, measuring the percentage of women within our workforce and driving balanced representation across all levels of the business.

**Performance against these KPIs directly influences the loan's margin:**

• A reduction when targets are exceeded.
• An increase when results fall short.
• No change when performance remains between the baseline and target

This financing is more than capital - it's a commitment. At euNetworks, sustainability and growth go hand in hand, ensuring every investment delivers value for our business, our stakeholders, and the planet.

**Results to date:**

• Environmental: We did not meet our emissions reduction target in 2024. Progress continues to be shaped by the challenge of reducing supply chain (Scope 3) emissions as we expand and invest in new network infrastructure across Europe. The shortfall reflects the scale and complexity of build projects, the limited availability of low-carbon materials, and the slower adoption of greener practices across the market. We're addressing these barriers head-on - working closely with suppliers, improving data, and driving innovation to accelerate progress in the years ahead.
• Social: Women represent 28.7% of our workforce, surpassing the 2024 KPI target of 28.1%.

| Year | Environmental Sustainability Benchmark | | | Social Sustainability Benchmark | | |
|---|---|---|---|---|---|---|
| | Target Score* | Target Emissions (tCO2e) | Performance | Baseline Score | Target Score | Performance |
| 2022 | ≥ 82% | N/A | | ≥ 25.3% | ≥ 26.3% | 26.3% |
| 2023 | ≥ 98% | N/A | | ≥ 26.3% | ≥ 27.2% | 27.6% |
| 2024 | ≥ 28.2% | 43,473 | 56,074 | ≥ 27.2% | ≥ 28.1% | 28.7% |
| 2025 | ≥ 33.8% | 40,092 | | ≥ 28.1% | ≥ 29.1% | - |
| 2026 | ≥ 39.4% | 36,711 | | ≥ 29.1% | ≥ 30.0% | - |
| 2027 | ≥ 45.1% | 33,329 | | ≥ 30.0% | ≥ 30.9% | - |

*The Environmental Sustainability Benchmark for 2022 and 2023 focused on renewable electricity procurement. From 2024 onwards, it evolved to target a direct reduction in emissions from our 2019 baseline - aligned with our Science Based Targets initiative.

# Supplier Engagement - Progression in Decarbonisation

Our supply chain remains the largest contributor to our carbon footprint. To decarbonise while expanding our network, we're working closely with suppliers to improve emissions reporting, strengthen data quality, and identify sustainable alternatives that reduce carbon impact.

We've segmented suppliers into tiers based on spend, emissions, and strategic importance. We began with our Priority suppliers - a small group that represents around 80% of our total spend and 55% of our Scope 3 emissions. This is where change can have the greatest impact. We're engaging these partners through a highly customised approach: individual calls, project-level reviews, and deeper collaboration between our Procurement and ESG teams. Together, we're discussing trials, sharing knowledge, and building the partnerships needed to embed sustainability into everyday delivery.

Our Core suppliers contribute another 20% of our overall emissions and form the second focus group. Here, we're exploring the best ways to engage - combining personal collaboration with

systems, automation, and market data to drive practical progress at scale.

We're making our supplier engagement programme more sophisticated each year - focusing our effort and resources where change will make the most difference. At the same time, we're looking at ways to influence the wider supply chain, sharing expectations, and encouraging others to move with us toward lower-carbon solutions.

Since launching our Supplier Engagement Programme, we've seen clear progress.

Through open dialogue and collaboration, suppliers are advancing their sustainability practices and data accuracy:

- A cable supplier now provides annual product carbon footprints, tracking emissions from raw materials to end of life.
- Our Dutch contractor reports their total carbon footprint and has begun mapping emissions by customer project rather than spend.

- Top equipment suppliers are shifting from spend-based estimates to more accurate, weight-based reporting, improving overall data integrity.

These advances are transforming how we measure, manage, and reduce our Scope 3 emissions.

## 'A' rating

In recognition of our leadership, euNetworks achieved an 'A' rating - the highest possible score - in CDP's Supplier Engagement Assessment (SEA).

This reflects our commitment to governance, risk management, and collaboration, and our drive to deliver real, measurable impact across our supply chain.

"

Working with euNetworks has been a real boost for us. They've backed us all the way - from digging into our carbon data with euNetworks' consultants, to teaming up on biodiversity projects with Islington Borough and Citizen Zoo. It's been proper collaboration, not just box-ticking. They've also pushed us to look deeper at project-level carbon - measuring the impact of the materials we use, like low-carbon concrete, so we can see exactly where we're cutting emissions on the ground. It's made us sharper and more aware of the choices we make every day.

Claire Parsons, Enviromental Manager, JSM Group Services Ltd

# Partnerships

**In this section**

# Corporate Partnerships

### Success Story - Raeanna

Raeanna joined euNetworks in 2019 as an HR Apprentice and has since advanced through the roles of HR Administrator and HR Generalist to her current position as HR Business Partner. Along the way, she earned her CIPD accreditation, building the expertise and confidence to take on broader responsibilities and make a deeper impact across the business.

Raeanna has led key initiatives - from our Mental Health Programme to the euNetworks Heroes Recognition System- shaping how we support and celebrate our people. Her journey is a powerful example of progression, purpose, and passion in action and proof of what's possible when talent is nurtured and opportunity meets ambition.

### LDN Apprenticeships

Since 2013, euNetworks has partnered with LDN Apprenticeships, creating new pathways for young professionals to launch their careers. The results speak for themselves - over 90% of our apprentices continue their journey with us after completing the programme. This partnership has become a cornerstone of our culture - fueling early careers, shaping future talent, and embedding growth and opportunity at the heart of our business. It also reflects our values in action: driving impact and embracing diversity, welcoming people from all backgrounds to help build the next chapter of euNetworks.

### JP Morgan Corporate Challenge

Our Frankfurt office once again took part in the J.P. Morgan Corporate Challenge, promoting fitness, wellbeing, and connection. With 25 participants, the event fostered teamwork, healthy competition, and camaraderie - reminding us that wellbeing and performance go hand in hand.

### EMC Home of Data

Each year, our Munich team partners with EMC Home of Data through their Rack4Roots programme - planting one tree for every rack installed. In 2024, euNetworks planted 250 trees in the Bavarian forest, supporting healthier ecosystems and deepening our connection with nature. This initiative strengthens relationships with customers and partners while reaffirming our commitment to environmental responsibility - proving that digital growth and natural restoration can progress side by side.

### Sustainable Trading

euNetworks had partnered with Sustainable Trading, a network dedicated to driving positive change across the trading industry. This partnership reinforces our commitment to providing low-latency, low-carbon connectivity - helping decarbonise one of the world's most data-intensive sectors. Many of our customers are also members, creating new opportunities for collaboration and carbon insight sharing to help them reduce their own footprints. We're learning from others in the network and exploring new ways to enhance transparency and reporting for our trading customers.

### South East Rivers Trust

euNetworks support South East Rivers Trust through volunteering activities such as river cleanups. With 10 volunteers from euNetworks participating in a river clean up, we are looking to extend these opportunities to our partners to participate in events which help improve the quality of our rivers in the UK and support local ecosystems alongside riverbanks.

# 2024 Emissions Summary

| Scope | Emission Source | 2024 (tCO2e) | 2023 (tCO2e) | 2022 (tCO2e) | 2021 (tCO2e) | 2019 (tCO2e) | Variance (%) |
|---|---|---|---|---|---|---|---|
| 1 | Natural Gas | - | - | - | 4 | 11 | -100% |
| 1 | Other Fuels | - | 79 | 2 | 2 | Not Reported | N/A |
| 1 | Company/Owned Leased Vehicles | 3 | 3 | 4 | 11 | 13 | -77% |
| 1 | Refrigerants and Other Fugitive Emissions | 73 | - | 209 | - | Not Reported | N/A |
| 2 | Electricity (location based) | 9.437 | 8,877 | 11,233 | 8,833 | 13,104 | -28% |
| 2 | Electricity (market based) | 84 | 31 | 357 | 3,812 | 4,191 | -98% |
| 3 | Purchased Goods and Services | 43,918 | 46,734 | 31,021 | 38,947 | 34,538 | 27% |
| 3 | Capital Goods | 4,108 | 5,902 | 1,769 | 8,021 | 5,095 | -19% |
| 3 | Fuel And Energy Related Activities | 2,221 | 2,609 | 2,542 | 2,729 | 2,531 | -12% |
| 3 | Upstream Transportation and Distribution | 17 | 16 | 51 | 4,656 | 2,132 | -99% |
| 3 | Waste Generated in Operations | 37 | 36 | 32 | 20 | 11 | 248% |
| 3 | Business Travel | 270 | 28 | 14 | 1 | 944 | -71% |
| 3 | Employee Commuting and Working From Home | 317 | 301 | 344 | 246 | 184 | 72% |
| 3 | Upstream Leased Assets | 4,977 | 5,230 | 3,122 | 3,680 | 10,695 | -53% |
| 3 | Downstream Leased Assets | 51 | 53 | 48 | 67 | 34 | 48% |
|  | Totals | 56,076 | 61,023 | 39,515 | 62,196 | 60,380 | -7% |

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

# Sustainability KPI Tracker

| Sustainability Indicators | | Topics | Metric | 2024 | 2023 | 2022[3] | 2021[2] | 2019[1] | Change over 2019 (%) |
|---|---|---|---|---|---|---|---|---|---|
| Finance | Finance | Revenue | €M | 255.1 | 242.0 | 214.8 | 193.8 | 167.6 | 52% |
| | | Book Value of Equity | €M | 489.1 | 559.0 | 728.0 | 702.0 | 850.0 | -42% |
| | | Book Value of Debt | €M | 750 | 831.2 | 660.5 | 608.8 | 503.3 | 49% |
| | Sustainability Linked Loan | Environmental KPI - 98% renewable energy by Year End 2023 | % | N/A | 99.7 | 82.0 | N/A | N/A | N/A |
| | | Environmental KPI - % reduction since baseline (2019) - 2024 onwards | % | 7 | N/A | N/A | N/A | N/A | N/A |
| | | Social KPI - 28.1% of workforce to be women by 2024 | % | 28.7 | 27.6 | 26.3 | N/A | N/A | N/A |
| Greenhouse Gas Emissions | GHG Emissions | Scope 1 Emissions | tCO2e | 76 | 82 | 227 | 16.7 | 24 | 217% |
| | | Scope 2 Emissions - Market Based | tCO2e | 84 | 31 | 357 | 3,812 | 4,191 | -98% |
| | | Scope 2 Emissions - Location Based | tCO2e | 9,437 | 8,876 | 11,223 | 8,833 | 13,104 | -28% |
| | | Scope 3 Emissions | tCO2e | 55,914 | 60,910 | 37,385 | 57,538 | 56,165 | -0.4% |
| | | Total Emissions | tCO2e | 56,074 | 61,023 | 37,969 | 61,367 | 60,380 | -7% |
| | GHG Intensity | GHG Intensity - revenue | tCO2e/€M | 219.8 | 252.2 | 176.8 | 316.6 | 360.3 | -39% |
| | | GHG Intensity - (Total Emissions / (Book Value of Equity + Net Debt)) | tCO2e/€M | 45.3 | 43.9 | 27.3 | 46.8 | 44.6 | 1% |
| Greenhouse Gas Policy | Reduction in Carbon Emissions | Paris Agreement aligned Business Plan | Y/N | Yes | Yes | Yes | Yes | Yes | N/A |
| | | Net Zero Commitment | Y/N | Yes | Yes | Yes | Yes | Yes | N/A |
| | | Interim Target for carbon reductions | Y/N | Yes | Yes | Yes | Yes | Yes | N/A |

# Sustainability KPI Tracker

| Sustainability Indicators | | Topics | Metric | 2024 | 2023 | 2022[3] | 2021[2] | 2019[1] | Change over 2019 (%) |
|---|---|---|---|---|---|---|---|---|---|
| Energy | Energy Consumption | Renewable Energy Consumption | KWh | 29,167,138 | 27,003,725 | 28,155,423 | 12,627,087 | 13,217,384 | 121% |
| | | Solar Energy Consumption | KWh | 161,953 | 240,261 | N/A | N/A | N/A | N/A |
| | | Wind Energy Consumption | KWh | 15,461,995 | 14,147,195 | N/A | N/A | N/A | N/A |
| | | Hydroelectric Consumption | KWh | 13,543,190 | 12,616,270 | N/A | N/A | N/A | N/A |
| | | Non Renewable Energy Consumption | KWh | 116,258 | 86,303 | 334,334 | 12,131,907 | 16,822,126 | -99% |
| | | Total Energy Consumption | KWh | 29,283,396 | 27,090,028 | 28,489,757 | 24,758,994 | 30,039,511 | -3% |
| | | Share of Renewable Energy Consumption | % | 99.6% | 99.7% | 98.8% | 51.0% | 44.0% | 126% |
| | Energy Production | Renewable Energy Production | KWh | N/A | 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 | N/A |
| | | Total Energy Production | KWh | N/A | 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 | N/A |
| Water | Water | Emissions to Water[4] | tCO2e | N/A | N/A | N/A | N/A | N/A | N/A |
| | | Water Management Policy | Y/N | No | No | No | No | No | N/A |
| | Water Stress | Exposure to areas with high water stress | Y/N | No | No | No | No | No | N/A |

# Sustainability KPI Tracker

| Sustainability Indicators | | Topics | Metric | 2024 | 2023 | 2022[3] | 2021[2] | 2019[1] | Change over 2019 (%) |
|---|---|---|---|---|---|---|---|---|---|
| Biodiversity | Biodiversity | Negative effects on biodiversity | Y/N | No | No | No | No | No | N/A |
| Waste | Hazardous Waste | Tonnes of hazardous waste | tCO2e | N/A | 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 | No | N/A |
| People | Employees | Number of employees | Number | 356 | 341 | 348 | 369 | 302 | 18% |
| | | Work-related Injuries | Number | 0 | 0 | 0 | 0 | 0 | 0% |
| | | Safety-related accidents | Number | 0 | 0 | 0 | 0 | 0 | 0% |
| | | Fatalities | Number | 0 | 0 | 0 | 0 | 0 | 0% |
| | Gender | Women in workforce | % | 28.7% | 27.6% | 26% | 25% | 24.2% | 14% |
| | | Board gender diversity (women) | % | 33% | 33% | 33% | 33% | 0% | 0% |
| | | Leadership Team gender diversity (women) | % | 38% | 44% | 22% | 22% | 0% | 0% |
| | | Unadjusted gender pay gap[5] | % | N/A | N/A | N/A | N/A | N/A | N/A |
| UN Global Compact | Compliance | Signatory to the UN Global Compact | Y/N | Yes | Yes | Yes | No | No | N/A |
| | Violations | Occurrences of violations to the UN Global Compact | Number | 0 | 0 | 0 | 0 | 0 | N/A |

# Sustainability KPI Tracker

| Sustainability Indicators | | Topics | Metric | 2024 | 2023 | 2022[3] | 2021[2] | 2019[1] | Change over 2019 (%) |
|---|---|---|---|---|---|---|---|---|---|
| Human Rights | Human Rights Policy | Human Rights policy available | Y/N | Yes | Yes | Yes | No | No | N/A |
| | Anti-Bribery | Occurrences of activities associated with anti-bribery | Number | 0 | 0 | 0 | 0 | 0 | N/A |
| | Controversial Weapons | Exposure to controversial weapons | Y/N | No | No | No | No | No | N/A |
| Security | Data Security | Training | Y/N | Yes | Yes | Yes | Yes | Yes | N/A |
| | | Certifications[6] | Y/N | Yes | Yes | Yes | Yes | Yes | N/A |
| | | Incidents | Y/N | No | No | No | No | No | N/A |
| TCFD | Transitional Risk | Identification and Assessment[7] | Y/N | Yes | Yes | Yes | No | No | N/A |
| | Climate Physical Risk | Identification and Assessment[8] | Y/N | Yes | Yes | Yes | Yes | No | N/A |
| ESG Policies | ESG Standards | Signatories to ESG related standards | Y/N | Yes | Yes | Yes | Yes | Yes | N/A |
| | Health and Safety | Implementation of a health and safety policy | Y/N | Yes | Yes | Yes | Yes | Yes | N/A |
| | Other Policies | Other ESG related policies | Y/N | Yes | Yes | Yes | Yes | Yes | N/A |

# Sustainability KPI Tracker

| Sustainability Indicators | | Topics | Metric | 2024 | 2023 | 2022[3] | 2021[2] | 2019[1] | Change over 2019 (%) |
|---|---|---|---|---|---|---|---|---|---|
| Suppliers | Policies | Commitment to Supplier Code of Conducts from stakeholders | Y/N | Yes | Yes | Yes | Yes | Yes | N/A |
| | Supply Chain Impact | Significant actual and potential negative environmental impacts from suppliers | Y/N | No | No | No | No | No | N/A |
| | | Significant actual and potential negative social impacts from suppliers | Y/N | No | 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 | No | N/A |
| | | Significant actual and potential negative social impacts as a business | Y/N | No | No | No | No | No | N/A |
| NACE Code | Nace Code | Nace Code | Number | 61.9 | 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.

# 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 signed |
| 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 | UN Global Compact: completed SDG Ambition Accelerator |
| 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 |
| Feb-25 | Graded 'B' by the CDP |
| May-25 | CSRD DMA completed and assured |
| Jul-25 | Completed inaugural GRESB reporting |
| Jul-25 | Graded 'A' by Supplier Engagement Assessment for CDP |

# 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<br>2. Percentage grid electricity<br>3. Percentage renewable | 1. Total Gigajoules (GJ) consumed: 105,402 Gj<br>2. Percentage grid electricity: 0.4%<br>3. Percentage renewable: In 2023, euNetworks purchased 99.6% 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,<br>2. Number of customers whose information was requested,<br>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,<br>2. Percentage involving personally identifiable information (PII),<br>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.<br>• Data security has been identified as material issue and appropriate Risk management measures are in place and continually updated.<br>• euNetworks tests the effectiveness of perimeter security controls to prevent and detect attacks (external penetration testing) annually.<br>• euNetworks runs vulnerability scans on a scheduled basis.<br>• 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<br>2. reused,<br>3. recycled, and<br>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<br>1. owned and commercially-associated content and<br>2. non-associated content | euNetworks does not differentiate between the two types of content identified in the standard.<br><br>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/.<br>euNetworks' peering location details could be viewed on www.peeringdb.com.<br>In addition, euNetworks is a heavy user of route servers on commercial Internet exchanges that provide free Internet peering connectivity to its members.<br>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<br>2. Customer average interruption duration | 1. Under evaluation for future reporting.<br>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 | euNetworks is fully compliant and certified with the industry security standard ISO 27001.<br><br>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.<br><br>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. |

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