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Sustainability Report 2024

Contents

Introduction

Letter from the CEO, Colt Technology Services

Welcome to our fourth annual Sustainability Report, which comes at a crucial time for progress and genuine care in our world. I truly believe Colt's focus on empowering everyone and protecting our planet has never been more important.

Colt is a global company that is determined to make a difference. I am very proud to share the impact of our sustainability strategy and the progress we've made on our environmental, social and governance (ESG) journey.

In the last year we have stayed true to our sustainability commitment, keeping ESG at the heart of everything we do, the solutions we offer and the pioneering innovation we create.

Since we set baseline measurements in 2019, we've reduced market-based CO_2e emissions by 35% and continue to make significant progress against our targets. We secured our platinum rating with EcoVadis for the third year in a row, making us the first and only digital infrastructure company to achieve this top rating for environmental performance consecutively. We were awarded Circular Economy Transition of the Year for the EMEA region after successfully launching our pilot metals recycling project.

Our employees felt empowered by our values in 2024, demonstrating 'we know people matter'. As part of our corporate social responsibility (CSR) programme, they gave double the number of hours to volunteer at external charities and initiatives compared to the previous year. Over 140 riders took part in our most accessible Colt Charity Bike Ride from Brussels to Dusseldorf, and through incredible fundraising efforts and match funding by Colt, we were able to donate almost €335,000 to local charities. Digital education and inclusion remained a key focus of our Global Social Impact Strategy and, with a focus on giving, we donated more than €560,000 to 67 amazing charities.

We strengthened our commitment to educating Colt's employees, customers and partners on climate change by partnering with the Arctic Arts Project. Together, we deliver inspiring and insightful programmes that are driving awareness and action around our impact in the tech industry.

Our sustainability journey is far from over, and we must push further together. It is up to every one of us to continue driving a sustainable future for our business, the environment and everyone we serve. ESG remains the foundation upon which Colt will innovate, grow and deliver an extraordinary customer experience.

Together, we can change the world.

Keri Gilder
CEO, Colt Technology Services
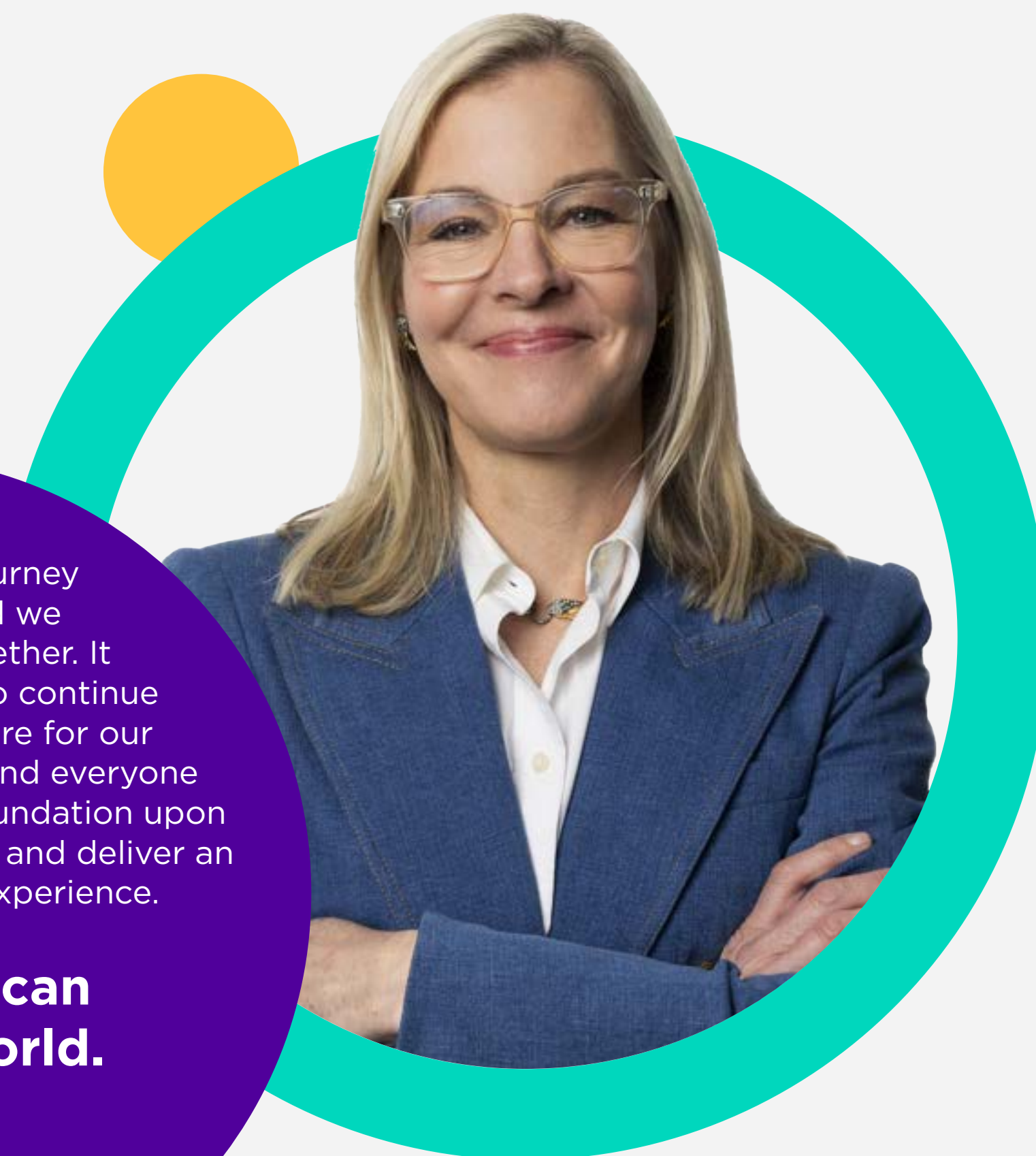
Introduction

Letter from the CEO, Colt Data Centre Services

For Colt DCS, 2024 was a year of significant growth. When we started our hyperscale journey nine years ago, the cloud market was $111b. Today, it is over $760b and is projected to grow even further due to the rising demand in streaming, cloud and artificial intelligence tools and services.

We are expanding our capacity worldwide, from London, Paris, Berlin and Frankfurt to Tokyo, Osaka and Chennai. To accelerate our growth plans in India, Colt DCS signed a joint venture partnership with RMZ this year, one of the world's largest family-owned alternative asset owners with 20 years' experience in developing, owning and operating high-quality infrastructure in high growth Indian markets. This partnership will provide opportunity to further accelerate the development of our existing sites in Mumbai and Chennai, and scope for an additional site to be added in the future.

I'm especially proud that we were able to help our customers scale and accelerate during this time of transformation by staying true to our core values: trust, respect, unite, sustain and trailblaze. Our values do not only form the foundation for how we serve customers and build relationships, but also help us develop innovative solutions to meet our sustainability commitments.

This year, we matched 100% of our annual electricity consumption globally with renewable electricity certificates, and we strive to continue to achieve this in the following years. We also continue to work closely with our hyperscale customers, who are among the leading buyers of renewable power, to cover their electricity consumption in our data centres. This will get us even closer to our target to become a net zero carbon company by 2045.

At the same time, we made significant strides towards our ambition to become an employer of choice. With the launch of MyLearningHub, the MentorU programme and the annual TRUST Guru awards, we hope to empower our colleagues and create a work environment in which they are celebrated for their outstanding contributions.

Even though the data centre industry has grown significantly, the year 2024 turned out to be a challenging year for the industry due to rising demand in capacity, growing concerns about environmental impacts and far-reaching regulatory requirements.

And while the pressures continue, we remain confident that we can be a key contributor in working towards a sustainable and viable build-out of the industry in the years to come.

Niclas Sanfridsson
CEO, Colt Data Centre Services

About this report

Colt Group is a global digital infrastructure company and data centre services group. It operates two businesses: Colt Technology Services (Colt) and Colt Data Centre Services (Colt DCS). The Colt Group Sustainability Report covers the period 1 January to 31 December 2024, unless otherwise stated. The report includes performance data across the material ESG topics identified and prioritised as part of the Double Materiality Assessment (DMA) conducted in 2024.

Colt Group completed the acquisition of Lumen's EMEA business on 1 November 2023. This report covers Colt Group 2024 data, including Lumen EMEA. Given the timing of the acquisition, data from 2022 and 2023 do not include Lumen EMEA unless otherwise noted.

This report was developed in accordance with the Global Reporting Initiative (GRI) standards. The sustainability activities reported by Colt Group have been independently verified by the British Standards Institution (BSI). More information can be found in the appendix, with the external assurance statement by the BSI.

2024 highlights

35%
reduction of total CO_2e market-based emissions since 2019

6
MEF Network as a Service (NaaS) Excellence Awards received

44.7%
of Colt Group's new hires were female (outpacing the industry benchmark by 17.4%)

113.8%
increase in community financial contributions compared to 2023

68 and 62
Colt Net Promoter Score (NPS) for EU and Asia (vs. industry average NPS of 31)

590.5
tonnes of IT hardware recycled (equivalent to ~2,200 tonnes of CO_2 and an estimated 5,600 tonnes of virgin materials)

97.6%
of Colt Group employees with permanent contracts

1,003.5
days volunteered (an increase of 19.2% compared to 2023)

75
Colt DCS Global NPS score

56.8%
of our Scope 3 emissions are with suppliers that have already set a Science Based Target (SBT) or signed a Sustainability Schedule

30.3%
battery electric vehicles (BEVs) across our fleet

69.0%
of our suppliers engaged on ESG matters

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About
Colt Group

Colt

Colt is a global digital infrastructure company which creates extraordinary connections to help businesses succeed. Powered by amazing people and like-minded partners, Colt is driven by its purpose: to put the power of the digital universe in the hands of its customers, wherever, whenever and however they choose.

Since 1992, Colt has set itself apart through its deep commitment to its customers, growing from its heritage in the City of London to a global business spanning 40+ countries with over 6,000 employees and more than 80 offices around the world. Colt's customers benefit from expansive digital infrastructure connecting 32,000 buildings across 230 cities, more than 50 Metropolitan Area Networks and 230 Points of Presence across Europe, Asia, the Middle East, Africa and North America's largest business hubs.

Privately owned, Colt is one of the most financially sound companies in the sector. Obsessed with delivering industry-leading customer experience, Colt is guided by its dedication to customer innovation, by its values and its responsibility to its customers, partners, people and the planet.

Please visit the Colt website for more information about the company, product portfolio and coverage map.

We bring together amazing people, intelligent networks and like-minded partners on a global scale to create solutions that put the power of the digital universe in the hands of our customers
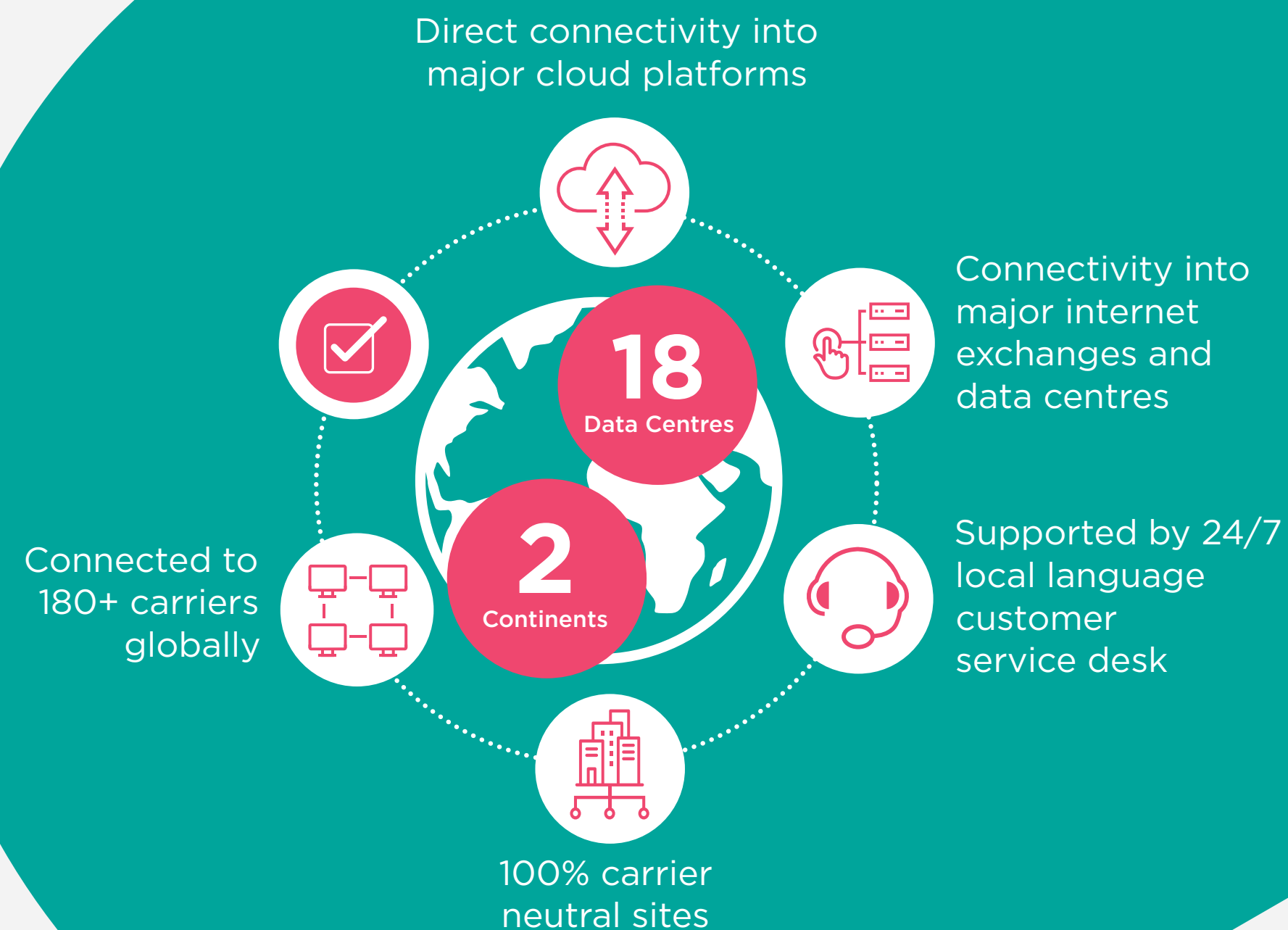
Colt DCS

Established in 2015 as an independent entity, Colt DCS rapidly expanded its data centre footprint across key markets in Europe and Asia. Specialising in the design, build and operation of hyperscale data centres, Colt DCS serves major cloud providers and enterprises to allow customers to grow their businesses with advancing and reliable technologies. Dedicated to becoming the most trusted, customer-centric data centre operator, it emphasises high customer excellence standards. In 2023, Colt DCS achieved a significant milestone with its separation from the Group, allowing it to better tailor services, meet customer needs and cultivate a unique culture while continuing to collaborate across all Colt services.

A complete description of the services the business provides and its locations are presented on the Colt DCS website.

Dedicated to becoming the most trusted, customer-centric data centre operator, Colt DCS emphasises high customer excellence standards

Direct connectivity into major cloud platforms

Connectivity into major internet exchanges and data centres

18 Data Centres

2 Continents

Supported by 24/7 local language customer service desk

Connected to 180+ carriers globally

100% carrier neutral sites

Our industry awards

NaaS Service Provider of the Year - Global

MEF Excellence Awards, 2024

NaaS Service Provider of the Year - Europe

MEF Excellence Awards, 2024

Best NaaS Vision – Service Provider

MEF Excellence Awards, 2024

Best Services Ecosystem Automation Platform

MEF Excellence Awards, 2024

Service Automation Leadership - Europe

MEF Excellence Awards, 2024

SD WAN Service Provider of the Year - Europe

MEF Excellence Awards, 2024

Amdocs Partnership Award

2024

Testing and Exercising Award

CIR Business Continuity Awards 2024

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Colt Group
ESG strategy

Colt Group ESG strategy

The ESG performance of the digital infrastructure and data centre services industries has enormous potential to advance a more sustainable world.

ESG is also essential to winning new business, attracting and retaining talent, adhering to legislation and mitigating risks. As such we designed the Colt and Colt DCS ESG strategies to support Colt Group's financial and competitive performance and significantly contribute to a sustainable future.

*To find out more about our ESG strategy, visit the **Colt** and **Colt DCS** ESG websites.*

We contribute to a more sustainable society through the following approaches:

Innovation	**Ambition**	**Empowerment**	**Trust**
We seek to achieve sustainable growth; incorporate sustainability into design, development and operations; and advance circular economy initiatives.	We will reduce our greenhouse gas (GHG) emissions across our own operations and value chain; become the sustainable supplier of choice and support our customers and their ESG activities; increase our use of renewable energy; and protect natural resources.	We attract and promote diverse talent, creating an environment where all our people can thrive and feel a true sense of belonging; make Colt Group an innovative, great and inclusive place to work; promote the wellbeing of the communities in which we operate; encourage our suppliers to align with our ESG goals through our Supplier Code of Conduct.	We meet the expectations key stakeholders have for the ethical and responsible business practices of a digital infrastructure and data centre provider; digital trust, responsibility and governance; risk management and transparent reporting backed by robust data.

Key initiatives in 2024:

Innovation	Ambition	Empowerment	Trust

Innovation

- Our product and operations teams collaborate with our ESG and marketing teams in a cross-functional forum to ensure the integration of sustainability across all aspects of our business.

- Our intent-based NaaS platform has been designed with sustainability at its core, enabling customers to optimise their networks with sustainability in mind.

- We piloted an award-winning Smart Buildings programme that monitors, controls and improves the performance of a building's core systems (e.g., heating, ventilation and air conditioning), thereby reducing energy consumption and CO_2 emissions.

- Our pilot with Urban Miners was recognised with the Circular Economy Transition of the Year Award for the EMEA region at the 2024 Environmental Finance Sustainable Company Awards and we expanded our partnership across European offices to recycle decommissioned equipment.

Ambition

- As we integrate Lumen EMEA into Colt Group, we have developed plans to stay on track for our net zero GHG emissions reduction targets approved by the Science Based Targets initiative (SBTi). This includes incorporating Lumen EMEA activity into our new global decarbonisation programme and Colt Group SBTs.

- We launched a sustainable supply chain programme to increase the number of suppliers with SBT commitments.

- We set gender diversity targets at Colt, aiming for women to hold 38% of all positions and 28% of senior roles by 2030.

- We became a signatory of the United Nations (UN) Global Compact's Women's Empowerment Principles.

Empowerment

- Colt Group received a Bronze award from the Inclusive Employers Standard, a globally-recognised workplace accreditation and benchmarking tool for inclusion and diversity.

- We launched an updated Inclusive Leadership Programme to support our people managers, tailored to address diverse circumstances.

- We continued focusing on digital inclusion, more than doubling our community financial contributions and increasing days volunteered by 19.2%.

Trust

- We strengthened our ESG governance by transforming the Sustainability Steering Committee (SteerCo) into the ESG SteerCo.

- We became one of the only digital infrastructure companies to be awarded the ISO 27701 certification on a country-by-country basis related to establishing a Privacy Information Management System (PIMS) to protect Personally Identifiable Information (PII).

- We updated our rules for data protection and data transfer as defined in Colt's Binding Corporate Rules (BCR); The update was approved by the European Data Protection Board (EDPB).

2024 EcoVadis Platinum

In 2024, Colt Group was awarded a 'Platinum' EcoVadis rating for the third consecutive year, recognising outstanding ESG performance and putting us in the top 1% of EcoVadis-rated companies globally.

2024 CDP

In 2024 we received an A- from CDP for our climate change disclosure, acknowledging our outstanding environmental performance for the second consecutive year.

Additionally, we obtained an A rating for the 2024 CDP Supplier Engagement Assessment for the third year in a row, highlighting our proactive efforts in reducing supply chain emissions.

UN Global Compact (UNGC)

The UNGC is a voluntary initiative based on CEO commitments to implement universal sustainability principles and to support the UN goals. Colt Group has been a participant since 2023 and is committed to submitting a Communication of Progress (COP) to the UNGC each year.

Go to appendix
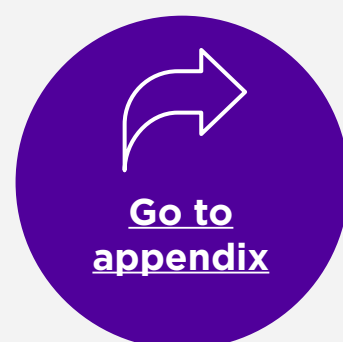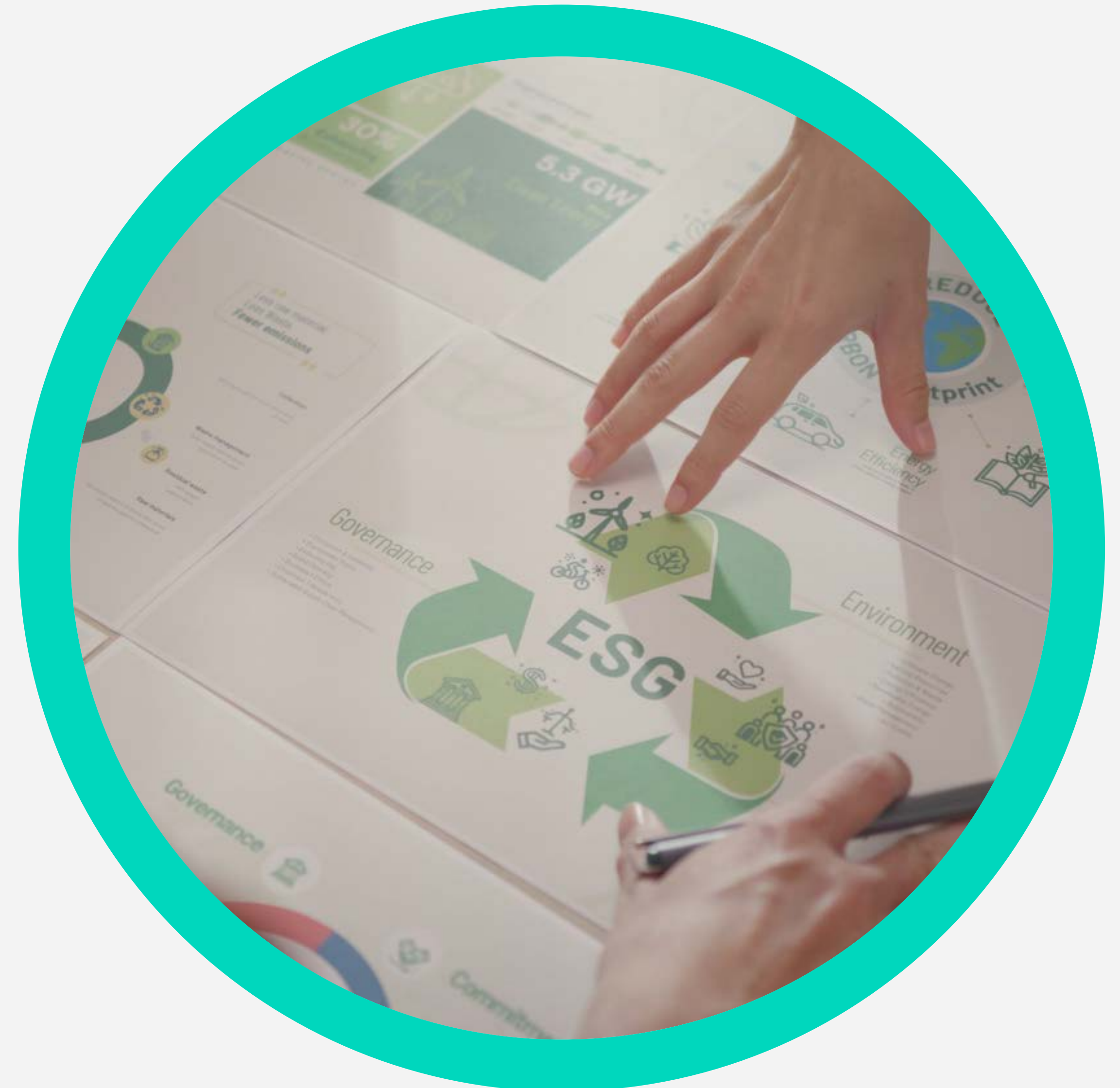
We are fully committed to supporting the **UN Sustainable Development Goals (SDGs)**. *You can find more details on the Colt Group's contribution to the SDG goals and targets in the Appendix.*

Double Materiality Assessment

Colt Group conducted its first DMA in preparation for the sustainability disclosures required by the upcoming European Union's ESG reporting regulations. This process helped us identify our material topics by considering the concept of double materiality, which looks at both the company's impact on the planet and the risks and opportunities it faces within its broader context.

Our materiality assessment process continues to be aligned with GRI's guidelines. To conduct the DMA, we established a cross-functional team to oversee the process and engaged an outside advisor who supported us as we undertook the following steps.
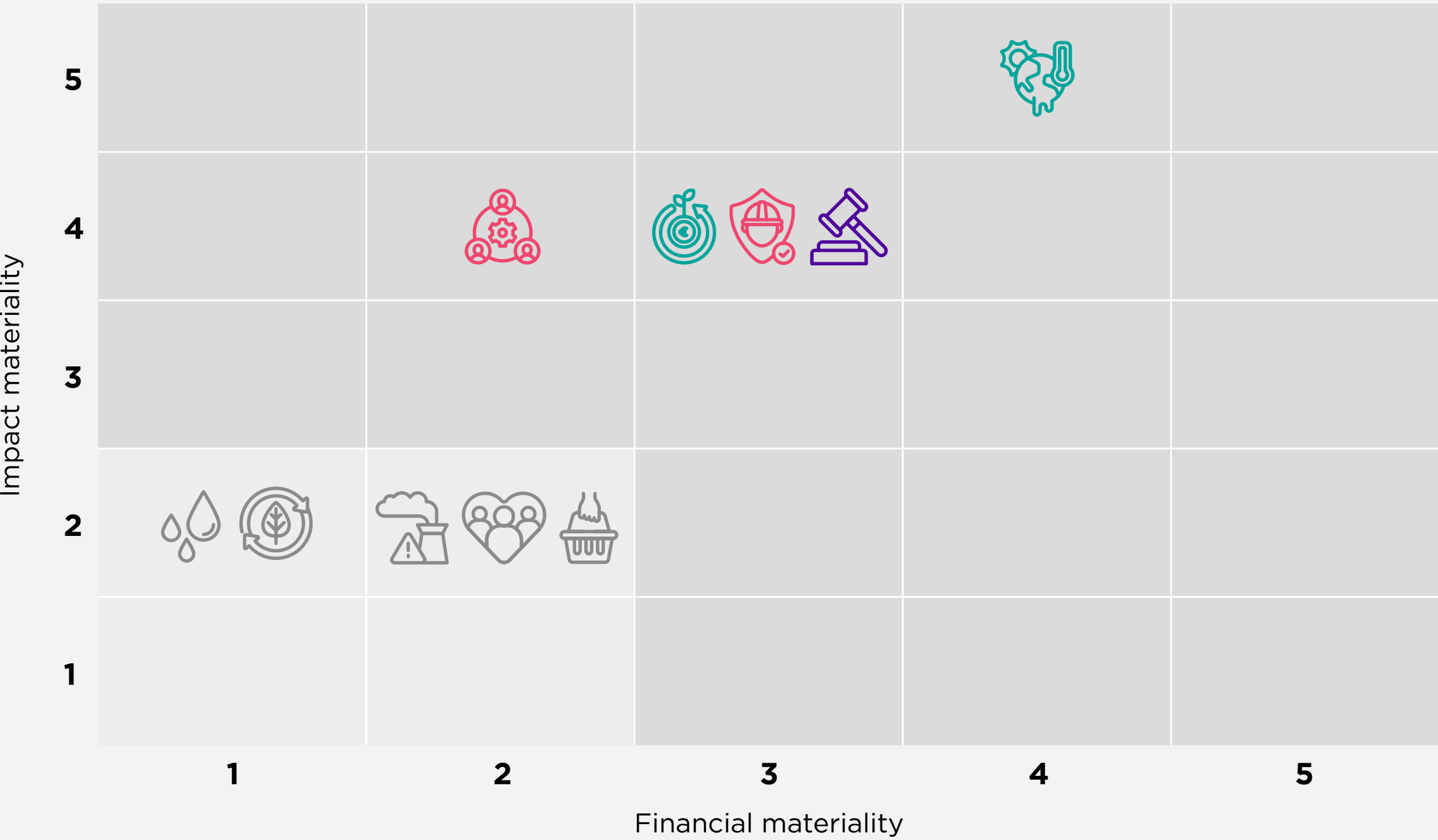
01

Scoping

We mapped Colt Group's business model, value chain and affected stakeholders; established assessment boundaries and thresholds; and determined key stakeholders and whom to engage.

02

Mapping Impacts, Risks and Opportunities (IROs)

We supplemented the output of the scoping step by:

- Conducting a benchmark of the materiality assessment of six respected peer companies

- Reviewing the materiality-related expectations of eight respected third-party guidelines including the relevant International Financial Reporting Standards (IFRS) and International Sustainability Standards Board (ISSB) for our industries

- Interviewing external stakeholders from customers, partners, suppliers, investors, NGOs and subject matter experts in the arena of sustainability for the digital infrastructure industry

- Conducting multiple internal workshops and interviews with a range of internal Colt Group staff from a variety of business lines and staff functions

We used this information to map potential IROs for assessment.

03

Assessing materiality

Following regulatory requirements and guidance, as well as emerging good practice, we set criteria such as severity, scale, scope, irremediability and likelihood for impact materiality and magnitude and likelihood for financial materiality.

Our evaluative process produced a list of topics assessed to be material from an impact perspective, financial perspective or both.

04

Validating and reporting

For the last step, we conducted several internal workshops and meetings to validate our findings.

Once finalised we also conducted an assurance readiness review of our DMA process to identify strengths, gaps and weaknesses in our approach. The output of this review highlighted improvement areas that we will work to address in the next reporting cycle.

Findings from the DMA

Impact materiality / Financial materiality

Non-material topics:

Pollution | Water and marine resources | Biodiversity and ecosystem | Affected communities | Consumers and end-users

The DMA identifies the material topics from an impact perspective, financial perspective or both. We identified the following material topics:

Climate change
Climate change adaptation

Climate change mitigation

Energy

Resource use and circular economy
Resource inflows, including resource use

Resource outflows related to products and services

Waste

Own workforce
Working conditions

Equal treatment and opportunities for all

Workers in the value chain
Working conditions

Equal treatment and opportunities for all

Business conduct
Corporate culture

Management of relationships with suppliers

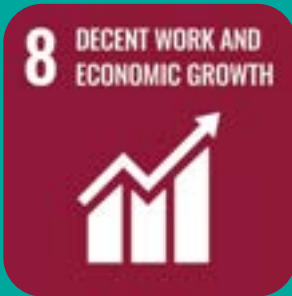Corruption and bribery*

*Not material from a financial perspective.

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Pioneering sustainable services

Innovating for a sustainable future

We're building our digital infrastructure with the future of our planet in mind

Our role as a digital infrastructure provider gives us a platform to accelerate sustainability transformations through innovation and the application of technological solutions, becoming the sustainable supplier of choice and helping customers improve their ESG performance. These are key elements of our business strategy underpinned by our ESG–by-design approach.

We aim to advance our full value chain towards a more sustainable future by driving pioneering solutions and creating a more agile, energy-efficient and modular digital infrastructure platform. We've continued to make progress towards retiring legacy platforms, upgrading software and designing infrastructure in sync with customer demand, while ensuring the circularity of our equipment. Our innovation efforts have steered cutting-edge advancements, such as the ability to deliver on-demand solutions, reduce customer hardware requirements and develop new smart building services, while continuing to lead in high-performance networking technology.

As our ESG strategy evolves, our product and operations teams collaborate with our ESG and marketing teams in a cross-functional sustainability forum to ensure the integration of sustainability across all aspects of our business. Through this approach, we consider sustainability and ESG metrics, where data is available, throughout the product and service life cycle and across our value chain.

Creating a future-proof business and delivering an exceptional customer experience wouldn't be possible without like-minded partners. Our approach to innovation is rooted in collaboration, and we work with leading global technology companies to ensure comprehensive support for our customers, however, wherever and whenever they need it.

Colt

Understanding how IT decision makers view sustainability

Our 2024 Digital Infrastructure Report explored the relationship between digital infrastructure, environmental impact and global governance.

> "The Digital Infrastructure Report holds a lens to the tech industry. It's become an invaluable source of truth, and this year's is the most profound and insightful we've ever published."
>
> *— Buddy Bayer, COO, Colt*

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The CIO's path to a better future

Colt's 2024 Digital Infrastructure Report
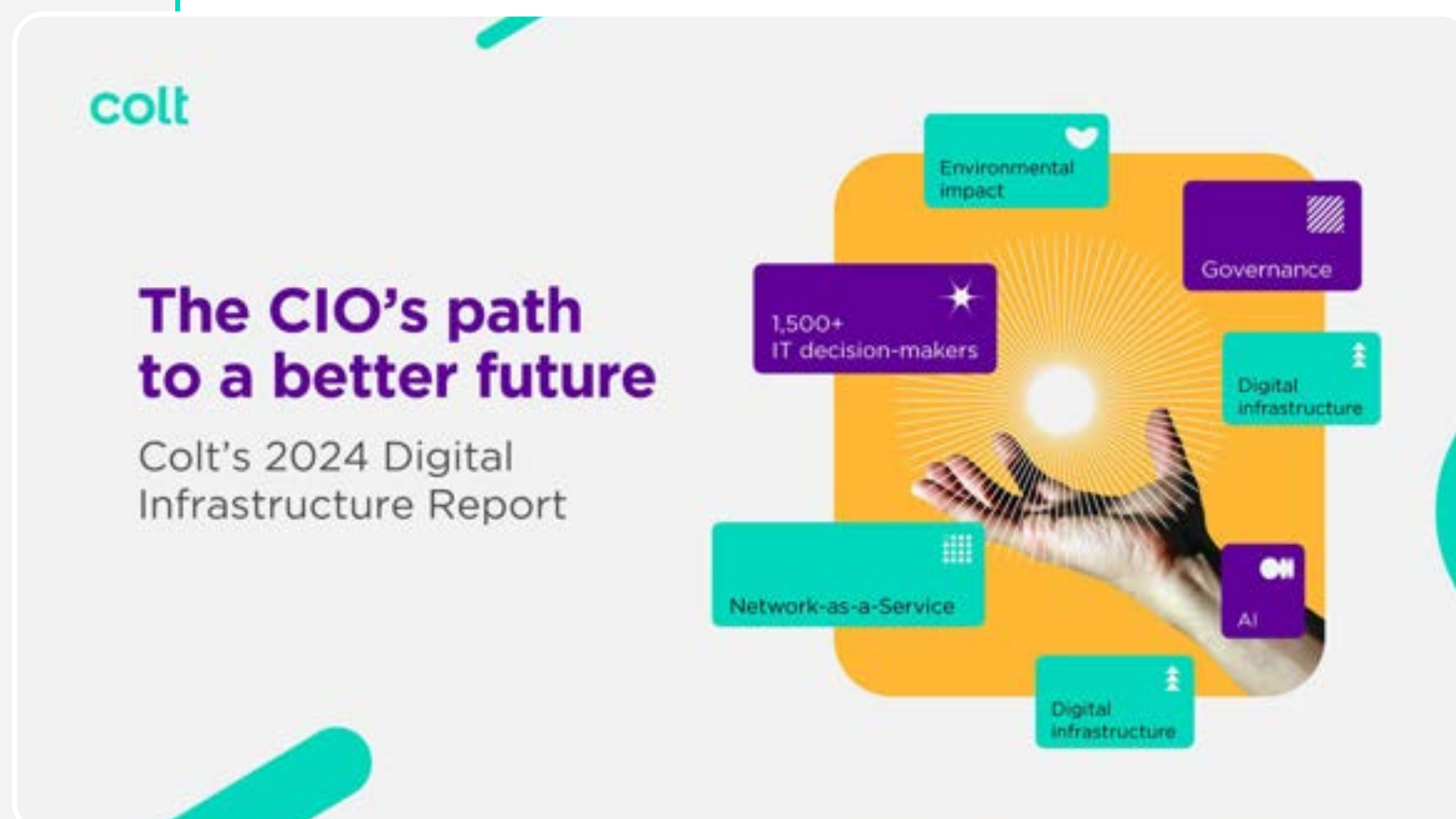
With insights from over 1,500 IT decision-makers across 10 countries and various industries, we sought to understand how companies balance business and ESG goals and their involvement at the strategic level. Key findings from the survey include:

- **71%** of Chief Information Officers (CIOs) play a direct role in shaping or owning sustainability strategies

- **38%** of this survey's respondents say environmental impact and governance drive all strategic digital infrastructure decisions

- With a **69%** net importance, survey respondents say data for Scope 3 emissions reporting is the most important factor for CIOs in selecting a digital infrastructure partner

- Features helping CIOs reduce carbon emissions include sustainably-optimised network pathing, on-demand/NaaS technology and AI-enabled capabilities

- Intelligent infrastructure adoption has grown: **40%** have intelligent digital infrastructure end-to-end in 2024, compared to 34% in 2023

- On-demand, virtualised network functions **(25%)**, adaptiveness to user demand **(25%)**, GenAI **(24%)** and flexible bandwidth consumption/NaaS **(24%)** top the list of reported intelligent infrastructure features

- AI is recognised as facilitating environmental impact and governance strategies for **22%** of CIOs and plays a modest role for **42%**

The findings emphasise the vital role that IT leaders play in driving sustainability efforts, whose involvement is likely to increase further as stakeholder pressures grow. It is expected that the investment in intelligent digital infrastructure will yield significant environmental benefits, arising from greater efficiency and lower bandwidth and power consumption.

We hold a universally-recognised leadership position on NaaS. Colt's on-demand NaaS platform is a cloud-based service model that allows organisations to outsource their networking infrastructure instead of building and maintaining their own network components. By extending the efficiency of cloud business models to the networking domain, we enable our customers to reduce costs, increase business agility and significantly reduce the environmental impact of their IT infrastructure and operations.

The service currently connects 27 countries across Europe, Asia and North America, catering to the growing demands of businesses for flexible and automated digital infrastructure. The NaaS model has significant sustainability-related benefits:
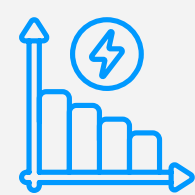
Energy efficiency: Utilising shared infrastructure reduces the overall energy consumption when compared to maintaining individual networks
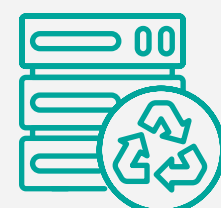
Reduced e-waste: Reduces the need for frequent hardware upgrades and disposal of obsolete equipment, thus decreasing electronic waste
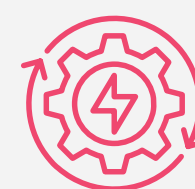
Improved energy proportionality: Better matching the rate at which energy is consumed to the rate at which useful work is done lowers the carbon emissions intensity of our network and all the services we provide to customers

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Colt

MEF NaaS Excellence Awards 2024

Colt won six prestigious MEF NaaS Excellence Awards in 2024, recognising our innovation, collaboration and leadership in the NaaS ecosystem. MEF is a non-profit industry forum that collaborates on defining new NaaS offerings, and develops standards, certifications and application programming interfaces (APIs) that accelerate automation and enable enterprise digital transformation.

- NaaS Service Provider of the Year – **Global**

- NaaS Service Provider of the Year – **Europe**

  SD WAN Service Provider of the Year – **Europe**

- Service Automation Leadership – **Europe**

- Best NaaS Vision, Service Provider

- Best Services Ecosystem Automation Platform

Colt has also achieved full Secure Access Service Edge (SASE) certification in the MEF 3.0 SASE certification program.

Colt

Intent-based NaaS platform: redefining connectivity for a sustainable digital future

Colt's intent-based NaaS features, set to launch in 2025, introduce new advanced Software Defined Networking (SDN) microservices to deliver intelligent, user-friendly network management.

Designed with sustainability at its core, the platform uses advanced software to help users control their network in an efficient and intent based way. It does this by optimising network paths based on latency and energy efficiency. Visualisation tools provide powerful insights into various aspects of network architecture, including network topology, SLA slicing, power consumption and carbon emissions, empowering businesses to transition seamlessly from L2 to L3 for AI-driven traffic steering.

Users can control their network through a self-service portal, allowing them to:

- Order and configure networks based on business intent
- Instantly receive quotes, track delivery and monitor real-time performance and SLAs including power and derived carbon emissions
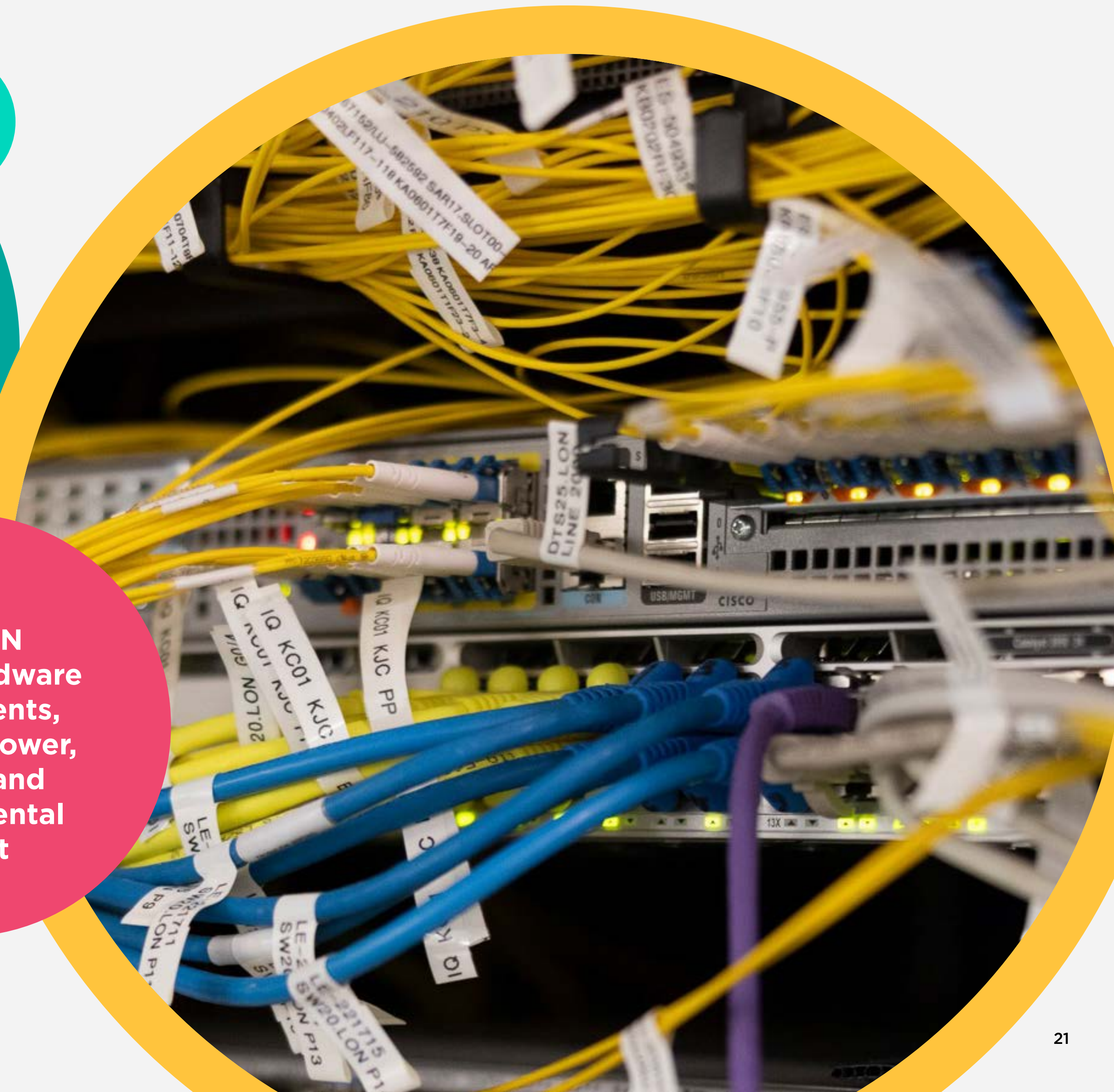- Dynamically adjust bandwidth or the service network path

A key innovation as part of intent-based NaaS is the ability to customise network paths, enabling users to select the most efficient options, avoid specific routes or cities and ensure sovereign networks within designated regions.

Colt is an industry leader in the use of Universal Customer Premise Equipment (uCPE) that consolidates functions such as routing, firewalls and edge computing onto a single hardware platform. When combined with software-defined wide area networking (SD WAN), Network Function Virtualisation (NFV) and emerging technologies such as SASE, uCPE reduces the total amount of hardware deployed at customer locations, therefore reducing energy consumption and complexity while also improving security and customer agility to adopt new technologies without replacing hardware. uCPE also enables Colt to deploy new advanced services such as edge computing and smart building technologies on this same platform without adding more hardware or increasing energy use.

The application of virtual Customer Premises Equipment (vCPE) and edge driven networks (EDN) also offers significant advantages over traditional CPE. The virtualisation of network functions onto a single centralised server avoids the need for individual dedicated equipment, including routers, firewalls and Wide Area Network (WAN) optimisation devices. By storing and processing data closer to the user, edge-driven networks enhance energy efficiency by reducing the amount of data transmitted through the network. Along with lower capital expenditures and reduced operational complexity, benefits of vCPE and EDN include reduced hardware requirements, reducing power, cooling and environmental impact.

uCPE reduces energy consumption, enables customers to adopt new technologies without needing to replace hardware and improves security

vCPE and EDN reduce hardware requirements, reducing power, cooling and environmental impact

An AI-enabled future will create significant data volume increases and related energy use, increasing the risk that businesses will fall short of climate targets. Colt is developing a future-ready AI platform that will help enable customers to reduce this risk in two main areas:

01 **New solutions:** Inference as a Service and Private Cloud offerings being developed at Colt will allow us to apply our industry-leading intent-based optimisation (see **Intent-based NaaS platform** case study for more information) to AI workloads, ensuring customers can simultaneously manage costs, carbon emissions and other impacts in ways aligned with their specific business objectives

02 **AI workload optimisation:** Temporal and Geographic shifting of workloads is becoming increasingly vital for AI model development and inference services, as energy supply challenges have an ever greater impact on the data centre industry in the coming years

Colt

Supporting GeSI's new report on digital infrastructure modernisation for an AI future

Colt has joined peers across the digital infrastructure industry in sponsoring a new report from the Global enabling Sustainability Initiative (GeSI), which identifies how the modernisation of infrastructure can enable the way for sustainable AI and address challenges and opportunities.

The rapid expansion of AI is driving extraordinary innovation but also creating significant energy demands. By 2030, data centres alone could consume up to 4% of global electricity, underscoring the urgent need to balance AI's environmental impacts with its transformative potential. To support the demands of AI, digital infrastructure must evolve.

We have continued our research and innovation efforts on incubating smart applications and exploring different use cases, jointly with customers and partners.

Colt

Smart buildings

Digitalisation is driving the ESG agenda across many industries. One focus area for the Colt Innovation team is efficient building management, aiming to eliminate unnecessary operational energy waste while enhancing indoor climate conditions.

The Colt Smart Building project, initiated in early 2024, aims to develop a fully-autonomous, AI-driven sustainable building management platform, capable of reducing energy consumption and CO_2 emissions by as much as 30% and cutting manual building management work by up to 50%. To achieve this, Colt Innovation partnered with Nuuka to design a platform integrating Colt's uCPE and connectivity with Nuuka's AI technology. Intelligent Indoor Air Quality (IAQ) sensors measure indoor conditions in the building (such as pressure differences, temperature, humidity and CO_2 levels), and an AI/ML model configures the most efficient heating, ventilation and cooling set-points in real-

time to optimise air quality with the least energy usage and CO_2 emissions.

In December 2024, a pilot was launched in Colt House, Colt's office in London, to analyse the control of fresh air supply into the building. The findings identified electricity savings of 8,400 kWh in six weeks, projecting annual savings of 72,800 kWh/ year (amounting to a 26.6% reduction in building electricity savings). It also improved IAQ through better stability in temperature, pressure and CO_2 levels. The next phase of the pilot will expand the AI-based control to the cooling and heating systems in Colt House, targeting energy savings and CO_2 reductions beyond the 30% goal.

Following the pilot's success, we plan to fully deploy the system across our portfolio of real estate assets and launch an enterprise solution proposition for our customers to advance their sustainability goals.

Colt

Piloting technologies for smart cities: innovating in edge computing with Street Edge

Colt teamed with Communications Infrastructure Networks (CIN) to create an edge compute pilot system called Street Edge, using Intel® architecture technology. Street Edge supports fibre connectivity and access to networking services, internet access, cloud-native edge servers for tenant applications, and space and power to accommodate up to three 4G/5G base stations.

Edge compute-based infrastructure services are increasingly being used to address the demands of applications requiring low latency, real-time processing, localised data handling and energy efficiency. By processing data close to the source, edge computing minimises the energy consumption associated with long-distance data transmission.

Colt managed the pilot deployment, located outside of Colt House and connected to the Colt network. We have demonstrated a number of use cases, including smart city energy monitoring and data collection, edge gaming, private 5G fixed wireless access and public 5G connectivity, and are currently working on a second phase for the private 5G platform running on Street Edge.

Colt has recently partnered with Alcuda to experiment with AI on a new edge use case for video analytics, with an indoor and outdoor 5G camera deployed to test AI-based analytics for smart city and smart office.

Collaboration

We work hand in hand with partners to be the digital infrastructure company our customers depend on and we strive to build partnerships that deliver extraordinary value for everyone. We carefully select our partners to ensure our values and approach to ESG are aligned.

You can find more information about our partners on our website.

In 2024, we completed a series of trials with high-profile global partners aimed at redefining the limitations of technology. As businesses demand efficient, low latency, future-ready networking solutions for AI, machine learning, API integration and other digital applications, we continue to innovate collaboratively and push the boundaries of what's possible.

Colt

Showcasing high-performance, energy-efficient networking technology

Colt and Cisco have a long track record of collaborating to explore new technologies which drive customers' success and accelerate automation. In 2024, Colt was the first in the industry to successfully trial Cisco's 800G ZR+ coherent pluggable optics. Pluggable optics are small, modular devices that can be inserted into network equipment like routers and switches to convert electric signals into optical signals and vice versa, which is essential for enabling high-speed data transmission over fibre optic cables.

The trial demonstrated that the network can handle incredibly high data rates of 800 Gbps – transferring one terabyte of data in just eleven seconds. This technology allows the network to allocate bandwidth flexibly, improving overall efficiency and performance. It also demonstrated the ability to double our data capacity while using 33% less power.

As we integrate the Cisco 800G ZR+ coherent optics across our infrastructure from mid-2025, it will offer faster, cost-effective services to our customers through our award-winning NaaS platform and help enable progress towards meeting carbon reduction goals.

Colt

Breakthrough in transatlantic transmission

Colt and Ciena joined forces and successfully completed the first-ever 1.2 terabits per second (Tb/s) wavelength transmission across the Atlantic using Ciena's advanced programmable technology, WaveLogic 6 Extreme. This breakthrough on Colt's Grace Hopper subsea cable doubled wavelength capacity and reduced power consumption by 50%, significantly improving network performance and energy efficiency. The trial demonstrated a 15% increase in spectral efficiency and route capacity, demonstrating the ability for businesses to meet bandwidth and latency demands without obstructing progress towards net zero goals. This achievement will allow Colt to offer better services at a lower cost and we plan to deploy the technology in our production network in the future.

> **"By doubling wavelength capacity and halving power consumption, we've raised the bar to deliver innovative and sustainable solutions that address evolving business needs."**
>
> *— Jamie Jefferies, VP and General Manager, International, Ciena*

Colt

Transatlantic partnership extends potential for capacity, speed and latency while reducing power usage on popular Europe/United States route

In late 2024, alongside Windstream Wholesale and Nokia, we successfully completed a world-first 800 Gigabit Ethernet (800GbE) service trial connecting London with Chicago across an 8,500km subsea and terrestrial route over the production network. The trial showcased innovative power-saving networking technologies from the three global tech businesses to test the boundaries of next-generation wavelength, capacity, speed and latency between two of the world's largest financial trading hubs.

The trial was successfully delivered using Nokia's pioneering sixth-generation Photonic Service Engine (PSE-6s) coherent optics and 7750 Service Router (SR) high-performance routing platforms boosting internet service speeds and supporting ultra-high wavelength capacity while maintaining power efficiency. 800GbE technology marks a breakthrough in service bandwidth, doubling capacity to support advanced network applications like AI data centre networking, content delivery networks and financial data hub connections.

Colt

Testing API collaboration and end-to-end NaaS automation

Colt and Proximus, Belgium's leading telecommunication and digital services company, completed a joint Proof of Concept based on MEF Lifecycle Services Orchestration (LSO) Sonata APIs to enhance carrier-to-carrier automation.

The Proof of Concept tested inter-carrier APIs to streamline service integration and automation and aims to improve customer experience and reduce delivery times. The trial successfully provisioned network services between the UK and Belgium, demonstrating automated, near-real-time managed services across multiple networks.
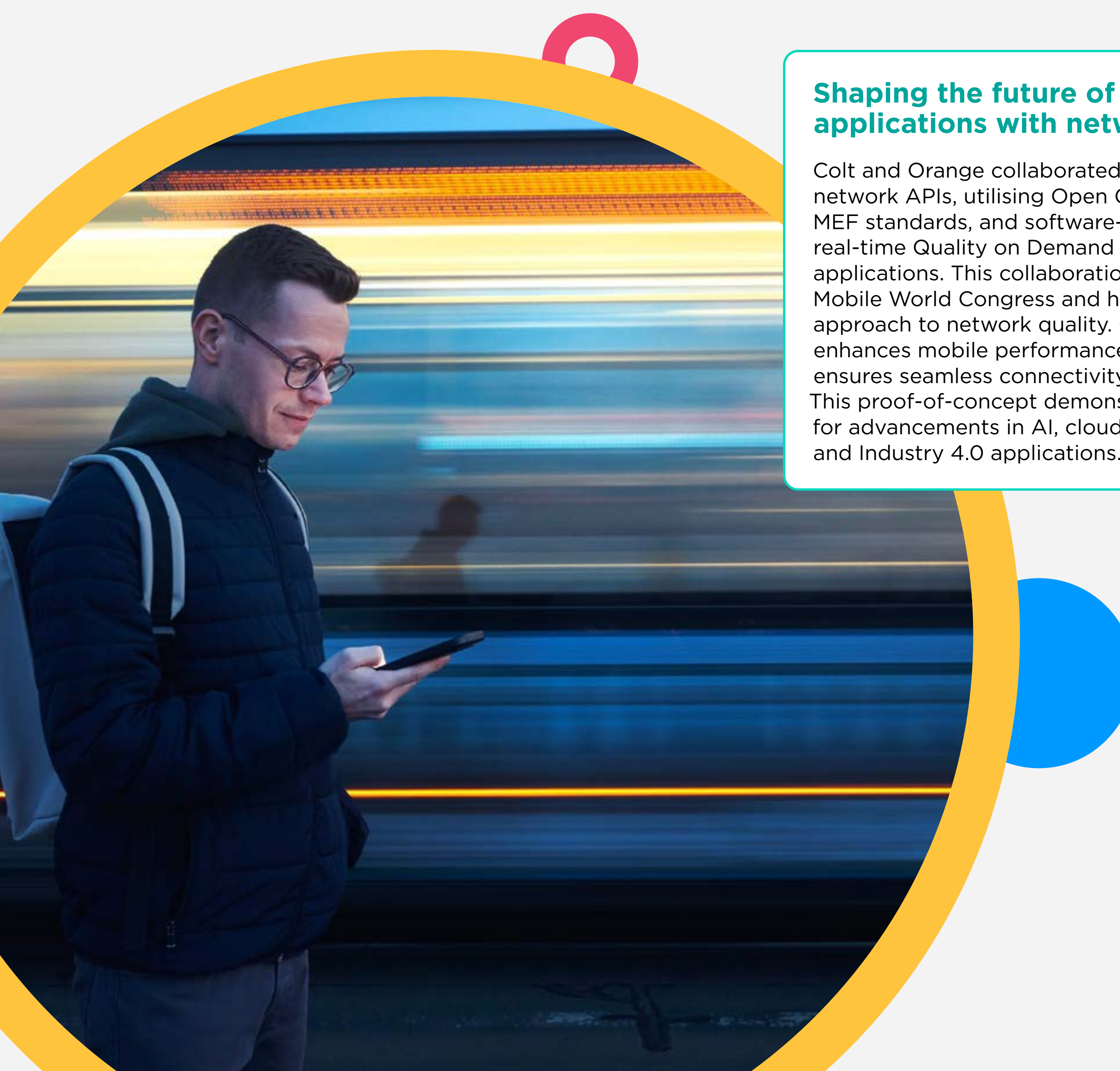
Colt

Shaping the future of edge-native applications with network APIs

Colt and Orange collaborated to demonstrate how network APIs, utilising Open Gateway CAMARA APIs, MEF standards, and software-defined networking enable real-time Quality on Demand (QoD) for edge-native applications. This collaboration was featured by MEF at Mobile World Congress and highlighted a converged approach to network quality. Orange's 5G QoD capability enhances mobile performance, while Colt's NaaS platform ensures seamless connectivity across the core network. This proof-of-concept demonstration paves the way for advancements in AI, cloud gaming, tele-robotics and Industry 4.0 applications.

Colt

Businesses in rural and hard-to-reach areas benefiting from new service Managed LEO+ following a successful trial

Colt completed a successful trial with a global biopharmaceutical company with operations in 30 countries, some of which are in rural locations previously underserved by network providers, and which required high levels of performance and reliability, regardless of whether they were located in urban or rural areas. By integrating low earth orbit (LEO) satellite connectivity with cellular 4G/5G, Colt's network met these requirements and more, enabling efficient remote access, improving collaboration and ensuring robust levels of regulatory compliance.

Following the success of the trial, Colt announced in 2025 the expansion to its technology portfolio with Managed LEO+, demonstrating our commitment to delivering innovative connectivity solutions which address the unique needs of its customers while maintaining business continuity in the most challenging environments.

Future-proof data centre design

The Colt DCS Global Reference Design (GRD) framework outlines our design requirements to develop and operate resilient and more sustainable data centres for the future. The framework includes several requirements to reduce our environmental impact, from carbon management and the use of sustainable materials, to energy efficiency and biodiversity. We are committed to design all our future data centres in line with the GRD requirements. This means that we strive to achieve LEED Gold certification (or equivalent), with a specific focus on improving energy efficiency, transitioning to alternative fuels and reducing operational waste.
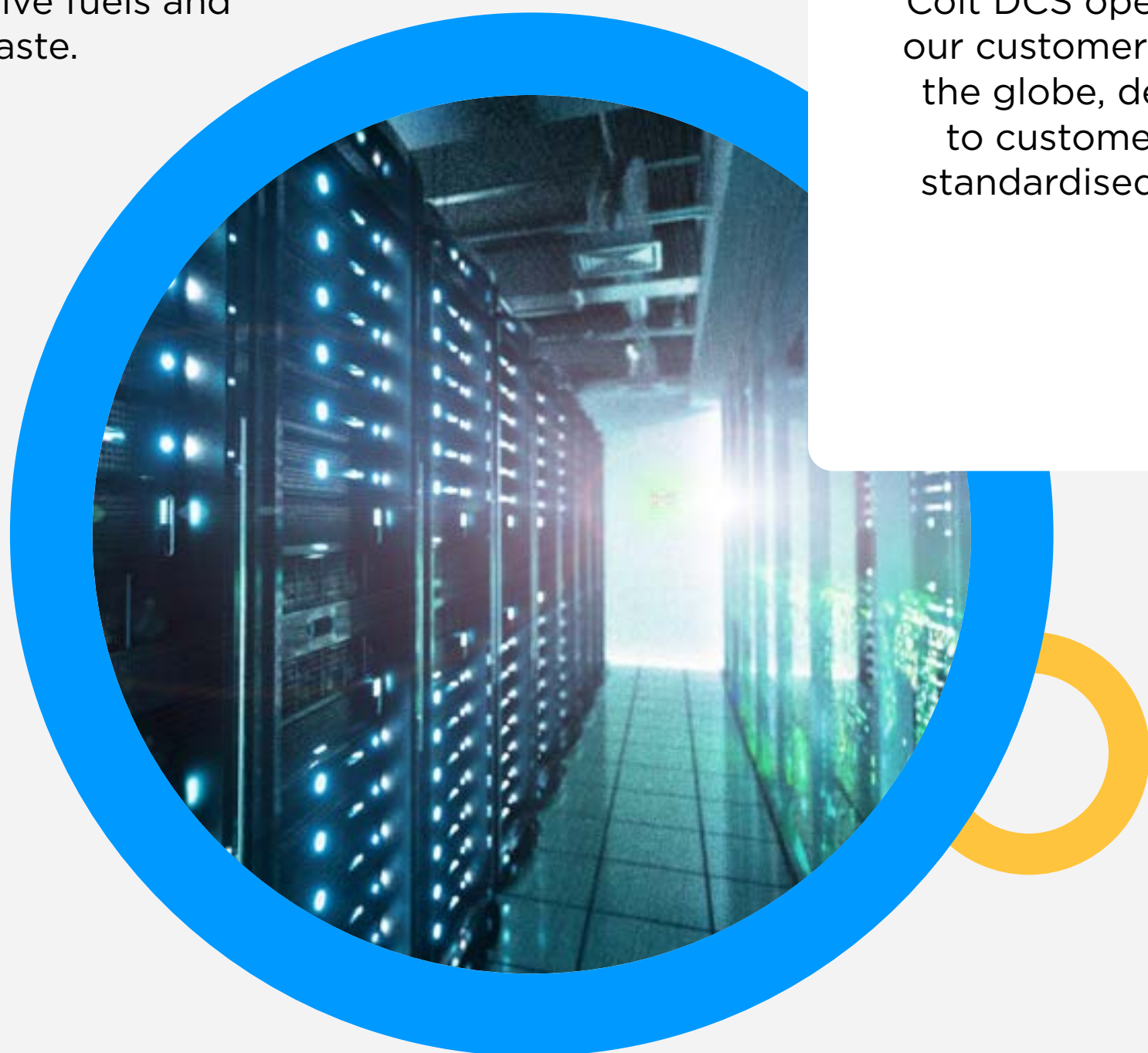
In 2024, Colt DCS launched the Central Telemetry Platform (CTP). The globally available solution developed in partnership with Protiviti, a global consulting firm and Microsoft Solutions Partner, enables customers to use real-time telemetry data to support the management of their platforms in Colt DCS' data centres around the world. Key features of the CTP include:

Access to thousands of data points

From data centres Colt DCS operates for our customers around the globe, delivered to customers in a standardised format

Near real-time data

Enabling customers to make accurate and timely decisions on their processing loads across multiple data centres by monitoring power usage, internal and external temperatures, Power Utilisation Efficiency (PUE) and alarm status

Data sent via API

With data sent every minute, customers can integrate the platform's API seamlessly into their existing systems, applications or dashboards to build powerful tools and automate processes based on the most current data available
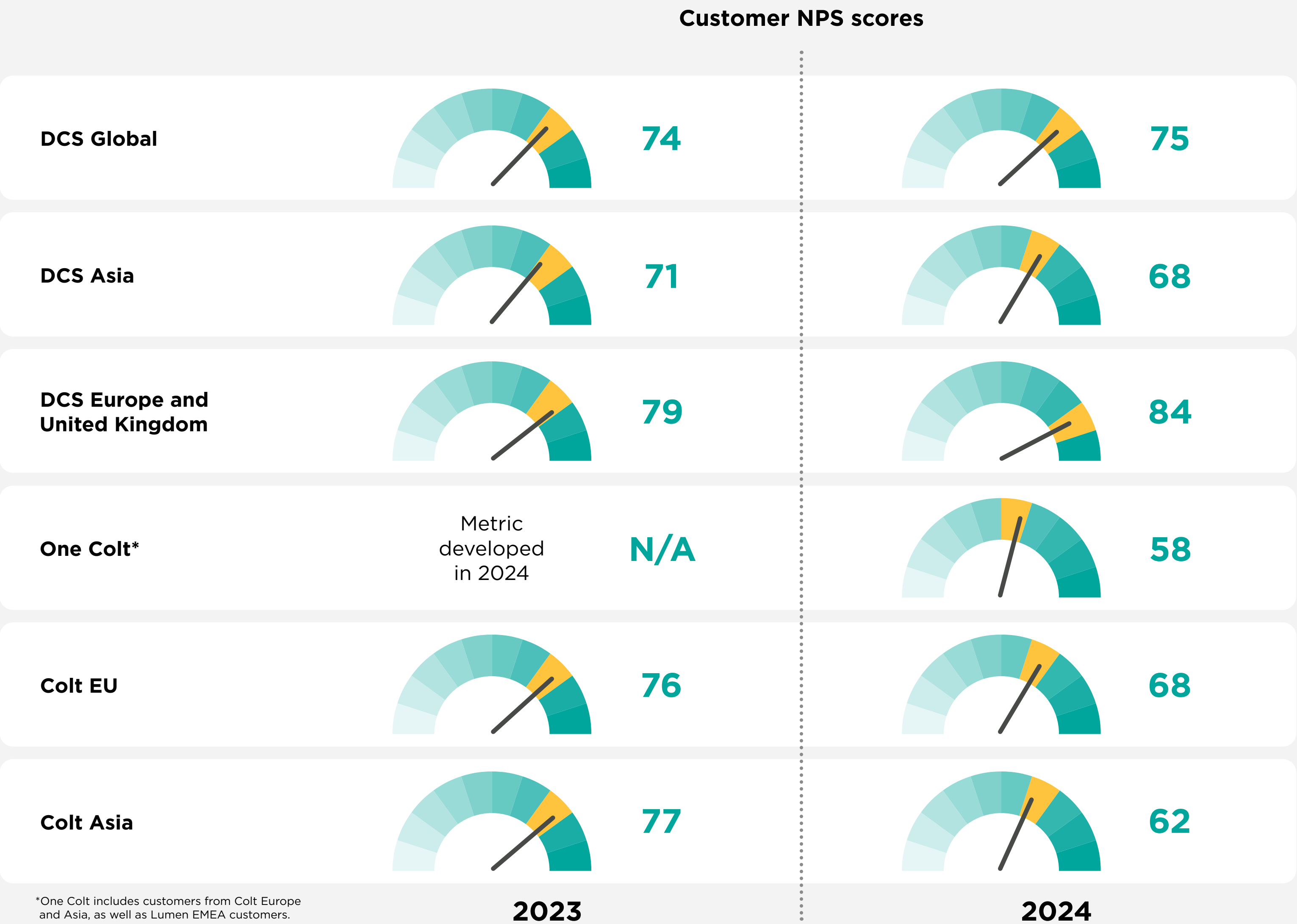
Simplified reporting dashboard

The platform includes visually engaging dashboards that transform complex telemetry data into intuitive graphs and charts to allow users to spot trends, identify anomalies and check for and provide evidence for SLA compliance

Customer success

We measure customer success by tracking our NPS, a key metric indicating our ability to meet our customers' needs. A strong NPS score is synonymous with consumer loyalty and satisfaction.

In 2024, we introduced a new NPS metric, One Colt, to reflect the experiences of Colt Group's cohesive customer base. We also increased the number of customers invited to participate in our customer satisfaction survey in order to understand more fully our entire customer base.

While we still superseded the industry average NPS of 31, some of our NPS scores decreased from 2023 to 2024. We believe this was the result of several changes across Colt, including the integration of Lumen EMEA, as well as changes to account management and tools. In light of these decreases, we increased our attention on customer feedback received throughout 2024. In 2025, we will continue to strengthen our approach to supporting customer success by establishing a Customer Experience Board that will be responsible for prioritising and acting on customer feedback. We have also established a customer-facing website to regularly communicate the improvements we are making.

Customer NPS scores

	2023	2024
DCS Global	74	75
DCS Asia	71	68
DCS Europe and United Kingdom	79	84
One Colt*	N/A (Metric developed in 2024)	58
Colt EU	76	68
Colt Asia	77	62

*One Colt includes customers from Colt Europe and Asia, as well as Lumen EMEA customers.

In 2024 we received several customer awards and recognitions.

BERTELSMANN

Bertelsmann Eco-Innovation Supplier Award

Our Smart Building Project, which was successfully implemented at Colt House, has been awarded the prestigious Bertelsmann Eco-Innovation Supplier Award that celebrates the most innovative and outstanding ESG initiatives for IT suppliers.

LCL Carrier Partner Sustainability Award

This award honours the IT company with the most significant contribution to sustainability.

Gartner.
Peer Insights™

'Voice of the Customer' Global WAN Services Customers' Choice

As a part of the 2024 Gartner Peer Insights™ 'Voice of the Customer' Global WAN services report, Colt scored a 96% 'Willingness to Recommend' rating based on 54 reviews from customers during an 18-month period that ran through to June 2024.
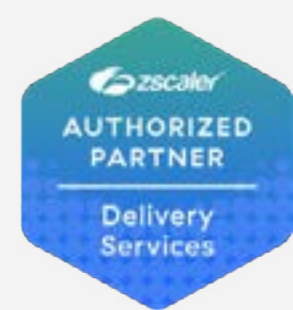
Prestigious accreditations in 2024

We became one of just 50 global partners to achieve **Zscaler's Delivery Services Authorized** status.

We achieved **AWS Advanced Tier Services Partner** status.

We were named a **Gold Google Verified Peering Provider.**

Colt DCS

Customer Experience Programme

The programme ensures every customer, regardless of size, has a touchpoint within Colt DCS and has access to readily available support. Our established Service Management team works with top-tier customers, providing support and collaboration alongside our experienced operational teams from site management to billing. Monthly structured feedback from customers allows us to quickly identify pain points, facilitating continuous improvement.

In 2024, we enhanced our customer self-service portal by introducing an Internal Performance Control approach. The customer portal now offers a one-stop shop for service requests and manages Colt DCS's internal performance, driving a continuous improvement mindset. Customers can log observations on health and safety, security and site issues, which are addressed and resolved with resolution times recorded. This transparency and access to live data have already led to improvements against our baseline responsiveness.

colt

Our commitment to the environment

Driving sustainable change

At Colt Group, ESG by design runs through everything we do, making sustainability a core element of our business model and decision-making processes. It shapes how we develop and provide our products and services, build and manage our data centres and handle our impact on the environment. This commitment is not limited to our own operations – we work across our value chain to create a more sustainable future, supporting our suppliers and customers to improve their ESG performance.

We have pledged to foster environmental advancements and ensure a sustainable future, as we detail in the Colt Environmental Sustainability Commitment and the DCS Environmental Sustainability Policy.

"There has never been a greater need for the industry to come together to drive positive change, and at Colt, we're determined to be part of the solution."

— *Keri Gilder, CEO Colt*

Colt

Promoting climate action with the Arctic Arts Project

We have commenced a three-year partnership with the **Arctic Arts Project**, a non-profit organisation dedicated to fighting climate change through collaboration, awareness and education. While our future depends on the world understanding climate change, it can be difficult to see its current effects. The Arctic Arts Project is bringing the story of climate change to life in order to help people understand the reality of the climate crisis and inspire them to action.

Our support as a Polar Partner, including funding, enables expeditions that document the impact of climate change through story telling. An Arctic Arts expedition to the Svalbard Archipelago in the Arctic, a region warming seven times faster than the rest of the Earth, resulted in the creation of a documentary film showcasing the reality of climate change effects and the world it threatens.

Colt

Relaunching our global Sustainability Week

To emphasise the role that sustainability plays in everything we do, we relaunched our global Sustainability Week in November 2024. During the week, employees actively engaged with and gained insights into critical environmental issues, participated in local CSR activities and developed their understanding of how Colt is collaborating to meet our ESG-related goals. We hosted a total of 11 events, including three global events, two in the UK, one in Spain, one in China and four in India. Through webinars, expert sessions and interactive workshops, more than 200 employees learned about plastic waste, building stronger communities and the role of biochar in fighting climate change.

This engagement continued through the Colt Pledge Wall initiative, where Colties around the world filmed and uploaded short videos in which they shared the changes they had already made, or pledged to make, in their day-to-day lives to positively impact the environment. The top five Colt country teams by number of pledges (proportionally based on country headcount) each received an allowance of €10,000 for donation to local charities contributing to ESG-related initiatives, aligned with Colt's ESG strategy. The successful country teams made donations to charities focused on:

India
Installation of solar panels at local schools

Spain
Supporting families affected by the DANA floods in Valencia

Romania
Planting trees and sustainable after school programming for children facing socio-economic challenges

Austria
Supporting a home and summer camp for children who cannot live with their families

Italy
Building a secondary school in Kisaki, Tanzania

Employee sustainability engagement

Our employees play a crucial role in our environmental efforts. Local Green Teams empower employees to participate in projects that address the environmental challenges they are passionate about and that make an impact in their communities. In 2024, total of 63 employees participated in our global Green Teams, which are led by local team leads.

Colt

Green Team initiatives

Austria: Colt employees worked with Vienna Green Heroes to clean the Danube River. They collected:

29,250 cigarette butts

128 glass bottles

248 PET bottles

20 e-scooter/bikes

Italy: Colt removed all single-use cups from hot beverage vending machines and replaced them with reusable cups and glasses.

30,000+ cups saved
(based on 2023 purchases)

India: In honour of Earth Day, employees learned how to properly compost kitchen waste.

Portugal: Employees cleaned a local beach, removing 52 kilograms of rubbish in one day.

Spain: Through collaboration with Sew It Forward, Colt employees learned basic sewing skills that will allow them to repair and extend the life of clothing.

United Kingdom: By partnering with Growing Green London and Hackney Outdoors, team members weeded and planted herbs, fruit bushes and small trees to enhance the outdoors for those living at the Whittington Estate in North London.

Colt DCS

Green Team initiatives

Japan: Teams in Japan organise monthly and bi-monthly clean-up activities near their Inzai Campus and Shiohama data centres. These initiatives do not only contribute to long-term sustainability but also societal wellbeing. Seeing the teams in action is great, making a difference to the environment and our local communities.

India: Our team in Mumbai partnered with the Child Help Foundation to undergo a litter-picking operation at Juhu Beach, in Mumbai, Maharashtra. Juhu Beach is the longest beach in Mumbai with thousands of tourists and locals visiting daily. With the substantial number of visitors, there is an increased amount of litter and plastic abandoned on the beach. The team was instrumental in cleaning up as much plastic and waste as possible, making waves toward a cleaner and clearer coastline.

Colt

Reducing the impact of our electronic communication

We've also been working to reduce the emissions associated with our electronic communication. Our Email Flow Reduction Initiative aims to reduce the number of emails sent by educating employees about the impact of "reply all," one-line messages and newsletter subscriptions. By reducing the number of emails we send and receive, we not only reduce our carbon emissions, but also support employee mental health and productivity.

Our progress toward net-zero

Colt Group's net-zero strategy

We remain steadfast in our commitment to reduce our carbon footprint in line with our SBTs and our broader net-zero ambitions. In 2024, we continued to enhance our decarbonisation strategy by incorporating Lumen EMEA activities and maintaining our ambition in the fight against climate change.

Our decarbonisation strategy focuses on improving energy efficiency, investing in renewable energy, and transforming supply chain practices as we continue to reduce our environmental impact and decrease our GHG emissions. This included developing a robust plan to achieve our near and long-term targets and map out the associated financial impacts. We plan to complete our carbon roadmap and financial model analysis in 2025.

Following the GHG Protocol best practices and Colt Group's rebaseline policy, we performed a comprehensive rebaselining exercise to accurately account for our expanded operational footprint due to the acquisition of Lumen EMEA. In 2025, we have engaged with the SBTi to communicate the increase in our emissions following the acquisition and to ensure that our SBTs hereafter will be reflective of our current operation and structural changes.

Colt Group has maintained the same ambition on its decarbonisation roadmap, while focusing on integrating Lumen EMEA activity

Main initiatives to help achieve Colt Group's net-zero targets

→ Achieve 100% renewable electricity procurement for all Scope 2 electricity by acquiring Renewable Energy Certificates (RECs) for all sites globally by 2030

→ Transition to more sustainable fuels for use in on-site back-up generators for data centres

→ Reduce emissions from refrigerant leakages by improving detection systems and transitioning to low global warming potential (GWP) refrigerants

→ Reduce indirect emissions by finding alternatives to travel and encouraging colleagues to choose better travel options for the environment. We have set an internal cost of carbon (€13 per tonne of CO_2e) to generate funding for investment in carbon removal initiatives

→ Decarbonise the in-house fleet through electrification and commit to a 75% pure electric fleet by 2030, with an interim target of 38% by 2025

→ Actively engage with our suppliers that represent 93% of our supply chain emissions, requesting that they align to an approved Scope 1 and 2, 1.5-degree SBT by 2025

→ Engage the business to ensure ESG by Design is embedded throughout everything we do and to better understand the environmental impact of Colt's investments

→ Continue to advance the six Colt DCS sites working towards TRUE* Zero Waste certification

*Total Resource Use and Efficiency is a zero waste certification program used by facilities to define, pursue and achieve their zero waste goals, cutting their carbon footprint and supporting public health.

Near-term target:

Scope 1 and 2
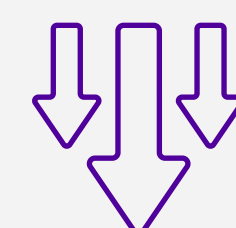
⬇⬇ **47%** absolute reduction by 2030 from a 2019 baseline (1.5°C aligned)

Scope 3
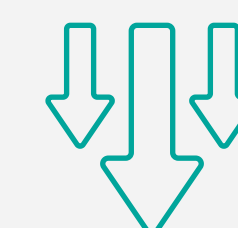
⬇⬇ **28%** absolute reduction by 2030 from a 2019 baseline (well-below 2°C)

Long-term net-zero target:

Scope 1, 2 and 3
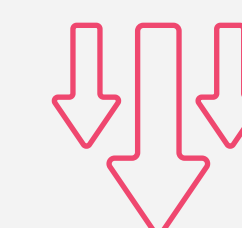
⬇⬇ **90%** absolute reduction in Scope 1, 2 and 3 emissions by 2045 from a 2019 baseline

Carbon reduction strategy

As a large company with global operations, we want to lead by example by reducing our carbon footprint as GHG emissions are the primary driver of climate change.

In 2024, Colt Group's total market-based carbon footprint was 352,635 tonnes of carbon dioxide equivalent (tCO_2e), a 10% decrease of GHG emissions compared to the previous year. This represents a 35% reduction from our 2019 baseline year. The emissions figures include the Lumen EMEA business which has been integrated into Colt Group's carbon footprint through a rebaselining exercise.

As of 2024, 94% of Colt's Group Scope 2 electricity consumption is procured from renewable sources through the use of renewable energy certificates, a 16% increase in global Scope 2 renewable energy procurement from 2023.

Colt Group is committed to achieving 100% renewable electricity procurement for all Scope 2 electricity by 2030.

We have also observed a 12% reduction in Scope 1 emissions compared to the previous year and a 43% decrease against the baseline, largely due to a significant reduction in refrigerant leakages in Colt sites, thanks to maintenance practices and the replacement of some recycled air-handling units (RCU) across Europe.

The reduction in Scope 3 emissions is primarily attributed to changes in Colt Group's supply chain-related GHG emissions, driven by evolving business needs and variations in supplier types. Colt is actively collaborating with its suppliers to ensure alignment with Colt's sustainability objectives (see **Scope 3 GHG emissions**).

Our total market-based GHG emissions have decreased by 35% from our 2019 baseline year

Colt Group 2024 GHG emissions (tCO_2e)

352,635 total

341,814 97%

3,881 1%

6,941 2%
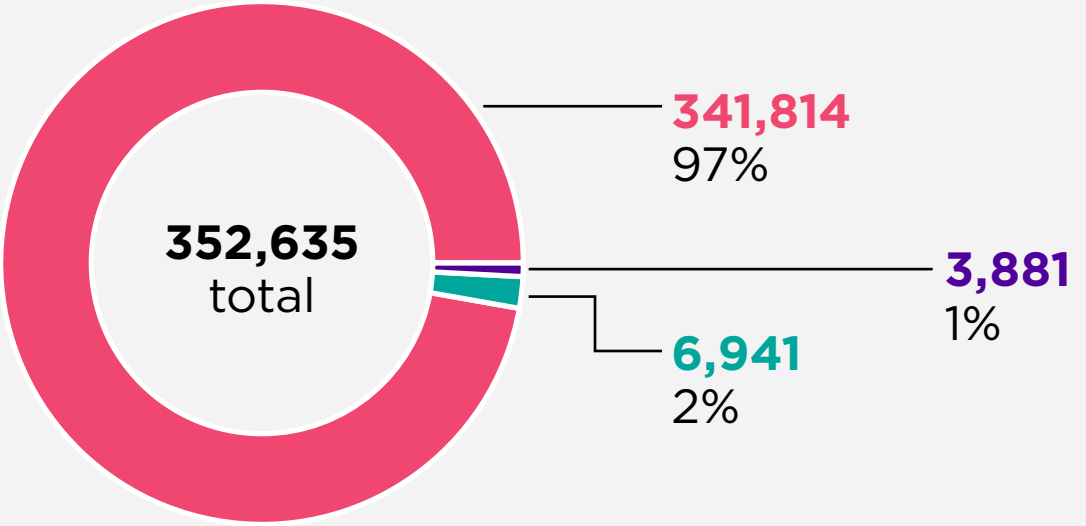
Scope 1: Direct GHG emissions from our company's operations under our operational control, including on-site combustion activities e.g. natural gas consumption, refrigerants, fuel and transport

Scope 2: Indirect emissions from the generation of purchased electricity, including heat and steam, for our own use, these emissions are calculated following the market-based and location-based approach.

Scope 3: Other indirect value chain emissions arising from our activities, including emissions from the production of purchased materials and services and capital goods. Upstream and downstream leased assets; fuel and energy related activities; waste generated in operations; business travel and employee commuting; upstream transportation and distribution.

Colt Group's 2024 GHG emissions calculations have been verified following the ISO 14064 standard

Colt Group GHG emissions in metric tonnes CO_2e						
	2019 (baseline)	**2022**	**2023**	**2024**	**Variation against 2019 (baseline)**	**Variation against 2023**
Gross direct (Scope 1) GHG emissions	6,773	3,950	4,395	3,881	-43%	-12%
Gross market-based indirect (Scope 2) GHG emissions	43,841	16,648	11,893	6,941	-84%	-42%
Gross direct and indirect market-based (Scope 1 and 2) GHG emissions	50,614	20,598	16,287	10,822	-79%	-34%
Gross indirect (Scope 3) emissions	495,494	311,643	374,463	341,814	-31%	-9%
Total emissions	**546,108**	**332,241**	**390,750**	**352,635**	**-35%**	**-10%**

a. Scope 3 and total emissions reported in this table, customer and supplier specific market-based Scope 2 emissions were reported where applicable, in absence of this, residual mix emission factors were applied.
b. Following best GHG Protocol practices we revisited previous years Colt Group GHG emissions calculations to include Lumen EMEA related GHG emissions. All figures in this GHG emissions table include Lumen EMEA.
c. Restatements - Categories 1 and 2 of Scope 3 for Colt (2019, 2022 and 2023) were restated due to an update on spend-based emission factors. We have moved from EORA to EEIO provided by the Carbon Trust. With regards to Scope 1, 2 and Scope 3 categories 1, 3, 5 for Colt DCS (2019-2023), the reclassification of some Colt DCS sites not considered under Colt Group's operational control has resulted in a restatement of the historical emissions data associated to this business activity. This adjustment was made to ensure compliance with the GHG Protocol under the Operational Control approach.
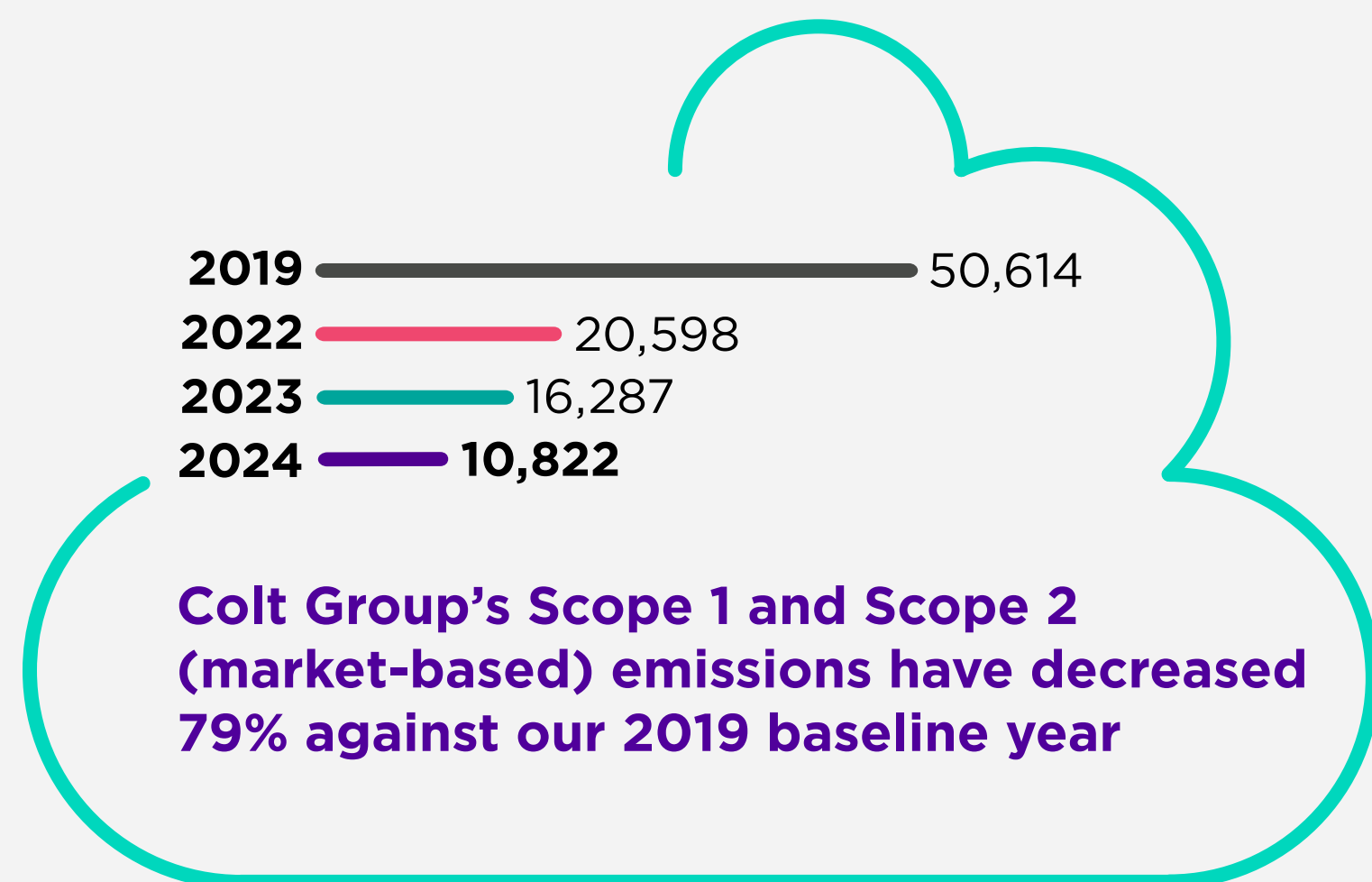d. We aim to have the most accurate understanding of our impact on the environment. We are continually improving the management and measurement of Colt Group environmental data. For more details about the restatements and the Colt Group GHG emissions methodology, please see **Greenhouse gasses calculation methodology**.
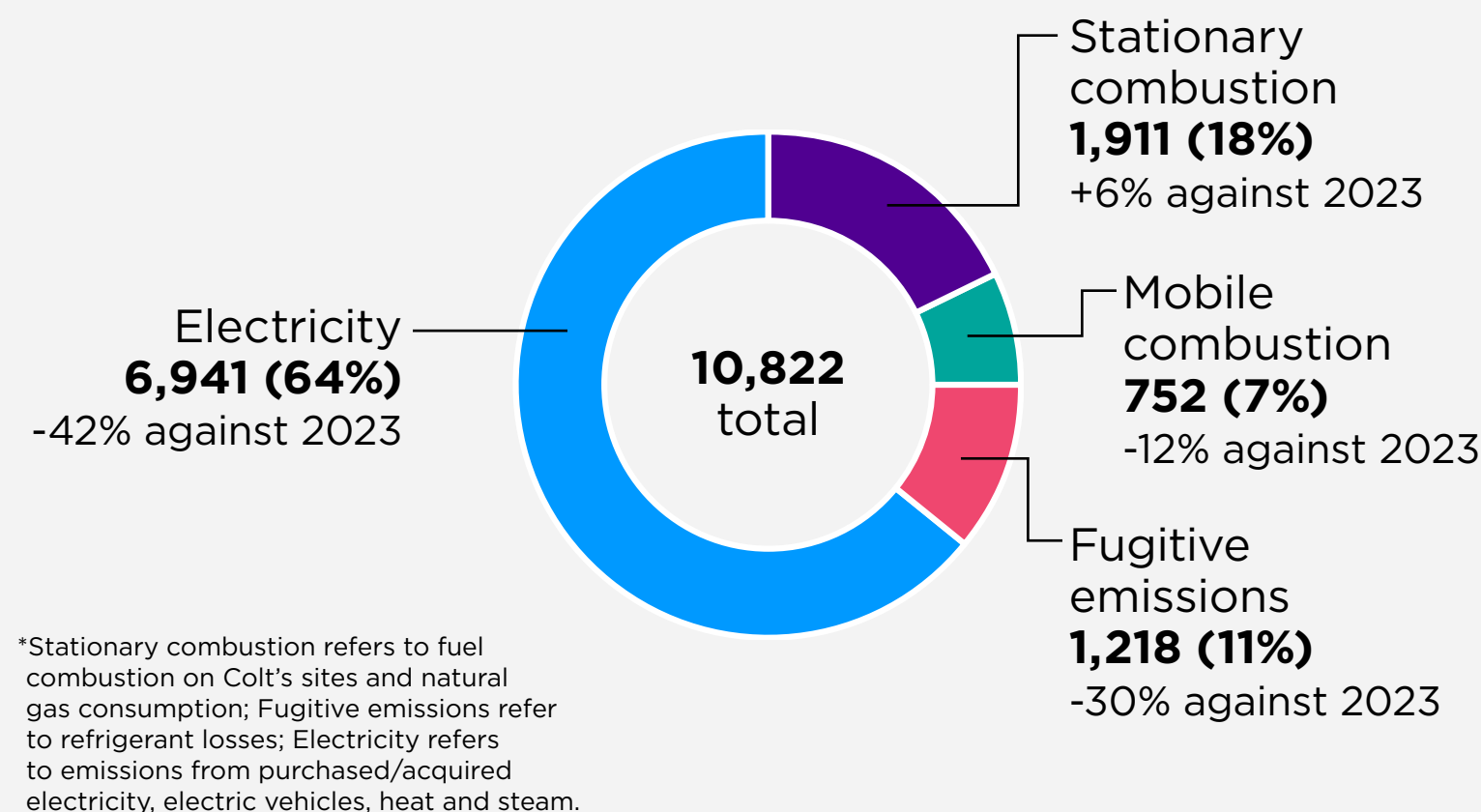
Scope 1 & 2 GHG emissions

Scope 1 and 2 emissions refer to operational emissions from sources owned or under our control. At Colt Scope 1 and 2 emissions include emissions from mobile combustion which refers to our vehicle fleet (see **Our fleet of vehicles**), fugitive emissions such as refrigerants, stationary combustion fuels and purchased electricity.

Colt Group's Scope 1 and 2 GHG emissions (market-based) totalled 10,822 tCO$_2$e in 2024, representing a 79% decrease against our 2019 baseline year and a 34% reduction from 2023.

Colt Group Scope 1 and Scope 2 GHG emissions (market-based, tCO$_2$e)

2019 50,614
2022 20,598
2023 16,287
2024 **10,822**

Colt Group's Scope 1 and Scope 2 (market-based) emissions have decreased 79% against our 2019 baseline year

Colt Group 2024 Scope 1 and Scope 2 GHG emission categories (market-based, tCO$_2$e)*

10,822 total

Electricity
6,941 (64%)
-42% against 2023

Stationary combustion
1,911 (18%)
+6% against 2023

Mobile combustion
752 (7%)
-12% against 2023

Fugitive emissions
1,218 (11%)
-30% against 2023

*Stationary combustion refers to fuel combustion on Colt's sites and natural gas consumption; Fugitive emissions refer to refrigerant losses; Electricity refers to emissions from purchased/acquired electricity, electric vehicles, heat and steam.

We have seen an increase in emissions from stationary combustion, driven by greater natural gas usage at our facilities. This increase is largely due to the use of back-up generators for maintenance activities and emergencies. Emissions from refrigerant leakage saw a significant reduction of 30% in 2024, thanks to the replacement of RCUs across Europe and favorable operational conditions.

Our market-based Scope 2 emissions in 2024 totalled 6,941 CO$_2$e. This represents an 84% reduction against our 2019 baseline. Market-based emissions represent the emissions tied to our electricity procurement which reflect the specific GHG emissions emitted by our electricity generators or suppliers. This method reflects the impact of our energy procurement decisions, particularly the emissions impact of purchasing electricity from a renewable supply.

In 2024, our Scope 2 location-based emissions decreased by 4% compared to 2023, thanks to several key initiatives. One major effort involved the decommissioning of legacy SDH/TDM networks. This included shutting down 32 switches and retiring over 6,500 SDH devices across Europe, resulting in annual savings of approximately 13.2 GWh of grid electricity. Through 2024, Colt Group has engaged in additional energy efficiency initiatives (see **Renewable energy and sustainable transport**).

Colt Group Scope 2 emissions (tCO$_2$e)

Scope 2 location-based GHG emissions
Scope 2 market-based GHG emissions

Year	Location-based	Market-based
2019	116,705	43,841
2022	75,590	16,648
2023	76,671	11,893
2024	73,872	6,941
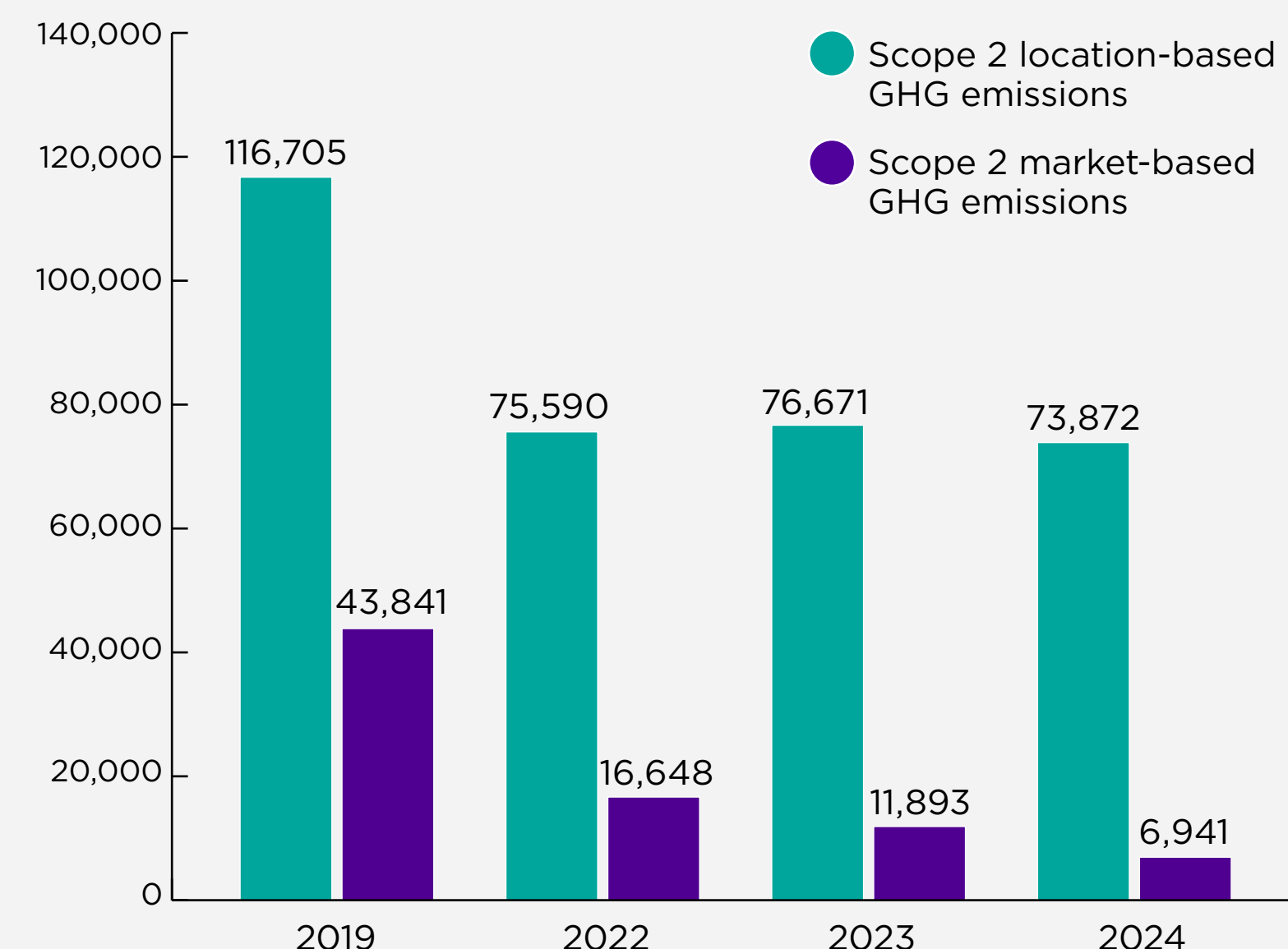
*The location-based method reflects the average emissions intensity of energy generation in the location where the energy is consumed. This approach mainly uses country's grid average emissions factor. Market-based method reflects emissions from the specific electricity products a company has chosen, applying supplier specific emission factors or countries' residual mix if supplier contracts are not available.

Scope 3 GHG emissions

Reducing Scope 3 emissions remains a top priority at Colt Group. We have made progress over the past few years, and we continue to define our pathway to net-zero. This includes finding innovative ways to reduce emissions and incorporating industry best practices. In 2024, our Scope 3 emissions totalled to 341,814 tCO_2e, which shows a reduction of 31% against our 2019 baseline and a 9% reduction in comparison to the previous year.

Colt Group Scope 3 GHG emissions (tCO_2e)*

Year	Value
2019	495,494
2022	311,643
2023	374,463
2024	**341,814**

Colt Group's Scope 3 emissions have decreased 31% against our 2019 baseline year

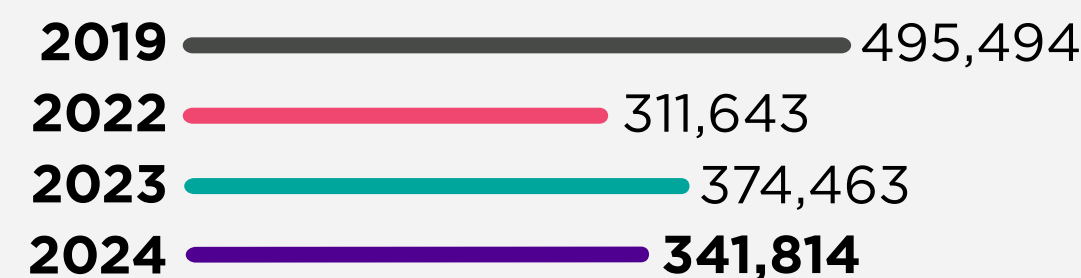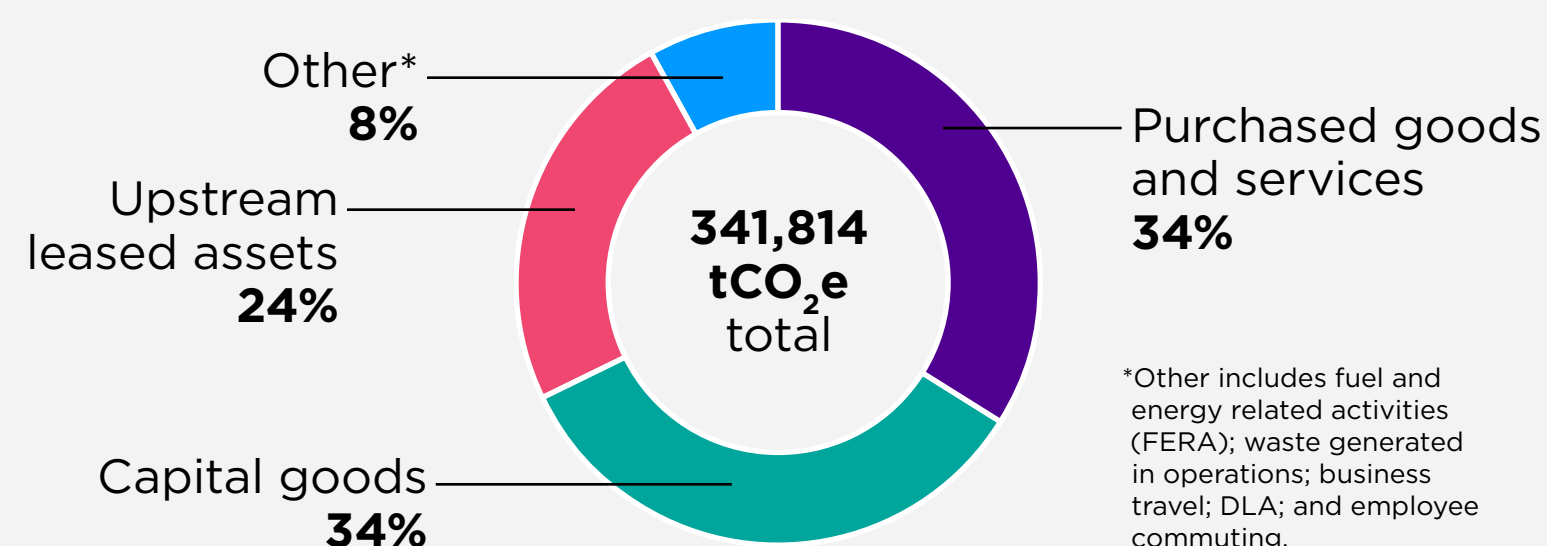*Including customer and supplier specific market-based Scope 2 emissions where applicable, in absence of this, residual mix emission factors were applied.

Colt Group 2024 Scope 3 GHG emissions (%)

341,814 tCO_2e total

Other* 8%
Upstream leased assets 24%
Capital goods 34%
Purchased goods and services 34%

*Other includes fuel and energy related activities (FERA); waste generated in operations; business travel; DLA; and employee commuting.

Our Scope 3 emissions in 2024 made up 97% of our total emissions

The majority of Scope 3 emissions are related to our supply chain (68%), which includes purchase of goods, services and capital goods. Our aim is to actively engage with our suppliers that represent 93% of our supply chain emissions, requesting that they set an approved Scope 1 and 2, 1.5-degree SBT by 2025.

In 2024, the approach to calculating emissions associated with our supply chain has been mainly spend-based, as we assessed the impact of integrating Lumen EMEA suppliers into our decarbonisation roadmap. We expect to have access to supplier-specific emission factors from next year onwards, enabling a more accurate calculation of Scope 3 category 1 and category 2 emissions. Additionally, a change in the spend-based emission factors used compared to the previous year has resulted in a restatement of prior figures (see Greenhouse gasses calculation methodology).

The variations observed in 2024 Colt Group's GHG supply chain-related emissions are mainly driven by changes in business needs and the type of suppliers. We are making a significant effort to engage with our suppliers to ensure alignment with our sustainability commitments. This ongoing collaboration will contribute to a reduction in supply chain-related emissions in the future, in line with our decarbonisation roadmap (see Engaging our supply chain for net-zero).

In 2024, the Colt Group emissions associated with Downstream Leased Assets (DLA) have seen a reduction compared to the previous year, due to an increase in renewable energy procurement covering Lumen EMEA customers' electricity consumption. For Upstream Leased Assets (ULA), in 2024 we saw a 4% decrease in emissions against 2023, mainly due to reductions in electricity consumption across Germany, the UK and Spain.

We are reducing indirect emissions by finding alternatives to business travel and encouraging our colleagues to choose more environmentally friendly travel options. In 2024, we achieved a decrease of 30% in our Scope 3 Business travel emissions compared to 2023, driven by a significant decrease in air miles travelled. Colt set an internal cost of carbon at €13 per tonne of CO_2e to generate funding for investment in carbon removal initiatives. In 2025, we will conduct a review of the internal cost associated with corporate travel, with plans to implement cost increases. This additional funding will continue to expand our carbon reduction strategy by investing in high-quality permanent carbon dioxide removal projects.

Colt

Investing internal carbon tax from business travel into innovative carbon capture

Our collaboration with Carbon Kapture, a circular economy carbon capture project, continued through 2024. Based in the UK and with the main project in Murloy Bay, Ireland, Carbon Kapture grows seaweed on local fishermans' ropes to absorb CO_2. The seaweed is then harvested and turned into Biochar which is donated to local farmers who use it to improve soil health and crop growth.

Using a proportion of funds raised from our internal carbon tax on business travel, we have supported the deployment of 1,000 metres of seaweed ropes, leading to the cultivation of four tonnes of wet seaweed and the creation 1.6 tonnes of 50/50 biochar/feedstock blend. As a result, the biochar sequestered four tonnes of CO_2e and avoided the use of 0.625 tonnes of synthetic nitrate fertiliser (preventing an additional 4.15 tonnes of CO_2e emissions). Additionally, as part of our collaboration with Carbon Kapture, Colt employees can make a direct contribution through a sponsorship portal to ensure the ongoing support and continuation of this project.

At the end of 2024, we secured an additional investment that will support Carbon Kapture's expansion in 2025.
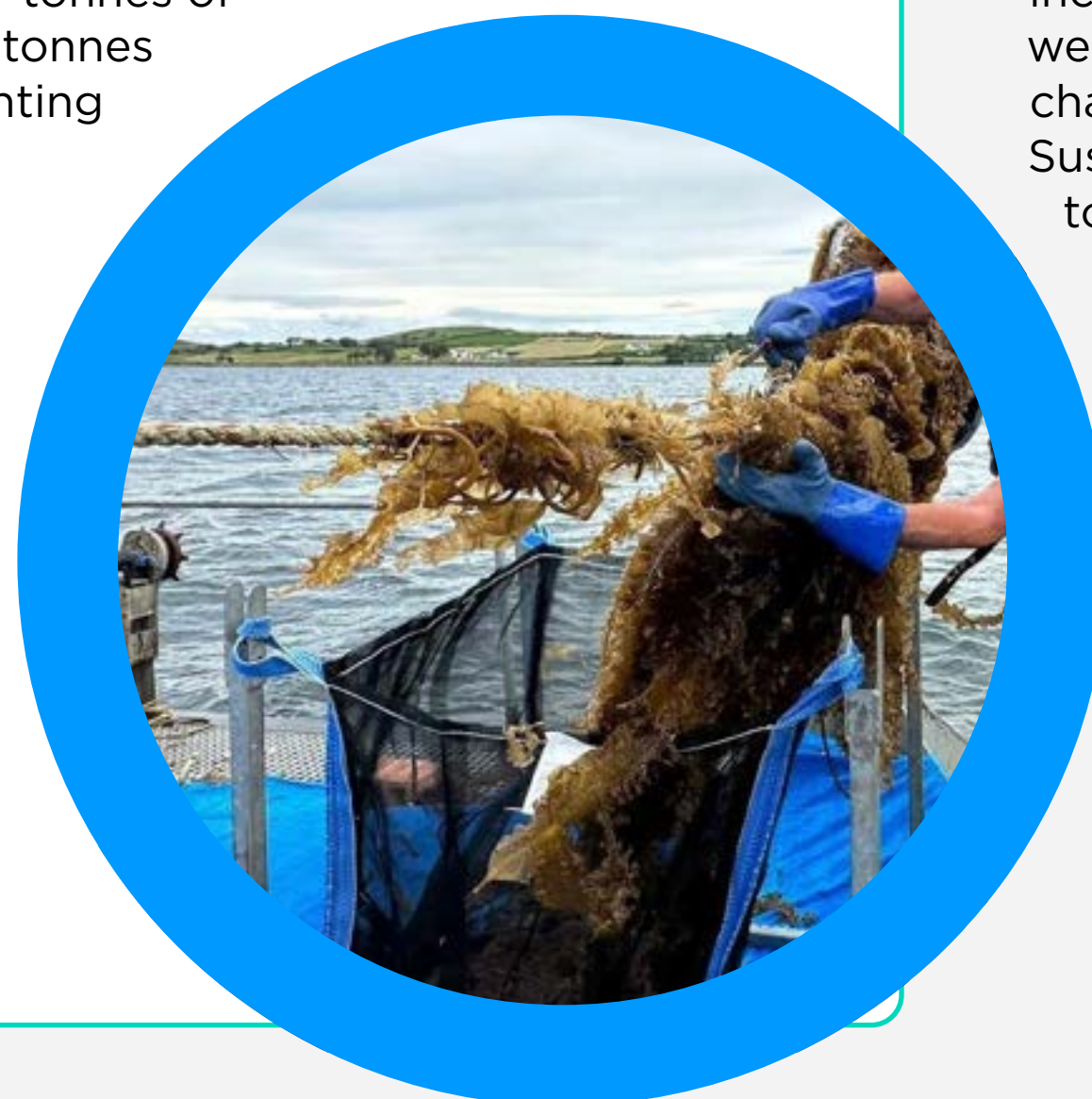
Engaging our supply chain for net-zero

Colt Group supplier engagement programme focuses on those suppliers which have the most impact on our supply chain emissions. Our aim is to actively engage with suppliers responsible for 93% of our supply chain emissions by formally requesting that they set an approved Scope 1 and 2, 1.5-degree SBT by 2025.

At the end of 2024, 56.8% of our supply chain emissions were from suppliers that have set SBTi aligned targets (or similar), or have signed the Colt Sustainability Schedule. This includes suppliers from Lumen EMEA that were incorporated into Colt Group's value chain footprint during 2024. Through the Sustainability Schedule we request our suppliers to develop and implement a plan to reduce carbon emissions. We also request they set their own SBT for Scope 1 and 2 emissions aligned with limiting global temperature rise to 1.5°C within two years.

2024 performance

39.9%
Supply chain emissions covered by an approved SBT

2.5%
Colt Group suppliers that have committed to setting an SBT (by % of emissions)

14.4%
Colt Group suppliers that have signed a Sustainability Schedule (by % of emissions)

56.8%
of our supply chain emissions are with suppliers that have already set a SBT or signed a Sustainability Schedule

Renewable energy and sustainable transport

We are on a journey to transition to renewable energy, with a target of 100% renewable Scope 2 electricity for all sites globally by 2030. Transitioning to renewable energy is an important element of our decarbonisation roadmap and is essential to reduce environmental harm, preserve natural resources and support global sustainability goals. In 2024, 97.4%* of the electricity used for Colt Group's operations in the UK and Europe was sourced from renewable energy. Additionally, across Colt DCS global operations, 100% of Scope 2 electricity used was renewable. For Colt Group's global operations, we increased the proportion of renewable electricity procured covering 94% of Colt Group's total Scope 2 electricity consumption. This was achieved through the procurement of RECs and Guarantees of Origin (GOs), including those associated with Lumen EMEA.

Colt Group operates on-site renewable energy generation in both Romania and Netherlands. In India, our Bangalore office sources 30% of its power from a 100 MW solar plant in Bellary, Karnataka, operated by Embassy Energy Limited under an agreement with Manyata Promoters.

We are continuously investing in upgrading our facilities and replacing equipment to improve energy efficiency. One way we do this is by enhancing PUE in our data centres. Our data centre in Les Ulis, France is aligned with ISO 50001 for Energy Management and the European Code of Conduct on Data Centre Energy Efficiency.

*Reduction from 100% prior to the acquisition of Lumen EMEA. This is an area of focus for future years.

Colt Group electricity consumption by country (%)*		
Country	**2024**	**Variation against 2023**
United Kingdom	30%	7%
Germany	19%	-8%
Japan	16%	-4%
France	15%	27%
Netherlands	6%	-39%
Spain	3%	-16%
United States	2%	-10%
Rest of Colt**	9%	-11%

*Does not include electricity consumption from electric vehicle charging; Includes energy consumption pertaining to Scope 2, including district heating and cooling kWh consumption; Does not include electricity consumption accounted for in Scope 3.
**Includes: Austria, Belgium, Bulgaria, China, Denmark, Greece, Hong Kong, Italy, India, Ireland, Luxembourg, Norway, Poland, Portugal, Romania, Singapore, Sweden, Switzerland and Turkey.

In 2024, Colt Group's global electricity consumption totalled 275,773,684 kWh, showing a 2.5% decrease from 2023. Significant reductions were observed in Spain, Italy and Germany, mainly attributed to the retirement of legacy energy-intensive equipment (SDH/TDM) across European sites throughout the year. In Netherlands, the reduction of 39% was driven primarily from Lumen EMEA operations due to a customer exit. The UK showed a 7% increase in electricity consumption driven primarily by higher energy demand from our Colt DCS operations. Similarly, electricity consumption in France increased by 27% in 2024, due to growth in our data centre services. In Japan, electricity consumption decreased by 4% following operational adjustments, and in the United States there was a 10% reduction following a customer exit and the shutdown of end-of-life equipment. Overall, significant steps have been taken to improve the quality of our utility data. This includes the installation of smart meters and the trial of AI systems to optimise building energy efficiency.

In 2024, 94% of the Scope 2 electricity we procured at our sites globally was renewable through the use of renewable energy certificates

Colt

Colt is officially free from energy intensive legacy networks in Europe
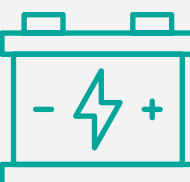
Colt has completed the transition from Time Division Multiplexing (TDM) networks in Europe, a significant milestone in network modernisation and sustainability. In 2024, we powered down the final 32 switches, migrating voice customers to modern platforms. We anticipate that this will lead to a substantial energy saving of 13.2 GWh per year and the removal of 130,000 legacy circuits from the network.

Overall, over 6,500 devices across 2,000 sites were decommissioned, allowing 2,800 customers to benefit from advanced digital services like On Demand, VoIP and IP Telephony. This effort is part of Colt's ongoing commitment to sustainability and our strategy, ESG By Design, which aims to create lean, sustainable and modular digital infrastructure where network optimisation is instilled as a continuous discipline.

Our fleet of vehicles

At Colt Group, we are working to decarbonise our in-house fleet through electrification with a commitment to a 75% pure electric fleet by 2030. Colt Group set an intermediate target of a 38% pure electric fleet by 2025, which we achieved by the end of 2024 when considering the Colt and Colt DCS fleet (excluding the Lumen EMEA fleet).

When including the Lumen EMEA fleet, we ended 2024 with 30% of BEVs and 42% Plug-in Hybrid Electric Vehicles (PHEVs). Specifically, out of our 445 active cars, 135 were BEVs and 185 were PHEVs. Looking ahead, we continue to work towards our 2030 target. For 2025 we are assessing ways of collaboration between the teams that would allow us to keep the same level of ambition for the entire Colt Group fleet, while policy harmonization is being conducted.

+34% BEVs against 2023

+45% PHEVs against 2023

38%
BEVs across Colt Group excluding Lumen EMEA
Intermediate target achieved

30% including Lumen EMEA

75% by 2030 target

Achieving this balance is crucial, as Electric Vehicles (EVs) offer significant environmental benefits over their lifetime, however we aim to phase out our current fleet gradually and assess the best options in accordance with the EV charging infrastructure available in each country we operate. In 2024, we added three additional EV charging stations across our Colt sites, for a total of 43 charging stations and 80 ports across our facilities. Additionally, at Colt DCS we have installed 29 EV charging points at five data centres across four countries. The charging points across Colt DCS sites remained consistent between 2023 and 2024. For charging points associated with Lumen EMEA, we are continuing to collect all relevant data across the entities acquired with the objective of integrating this information into Colt Group reporting by the end of 2025.

By focusing on electrifying our vehicle fleet and installing EV charging infrastructure, we're supporting sustainable transportation and aim to lower emissions from mobile sources. Moving forward, we will continue exploring strategies to enhance the infrastructure necessary for our decarbonisation efforts.
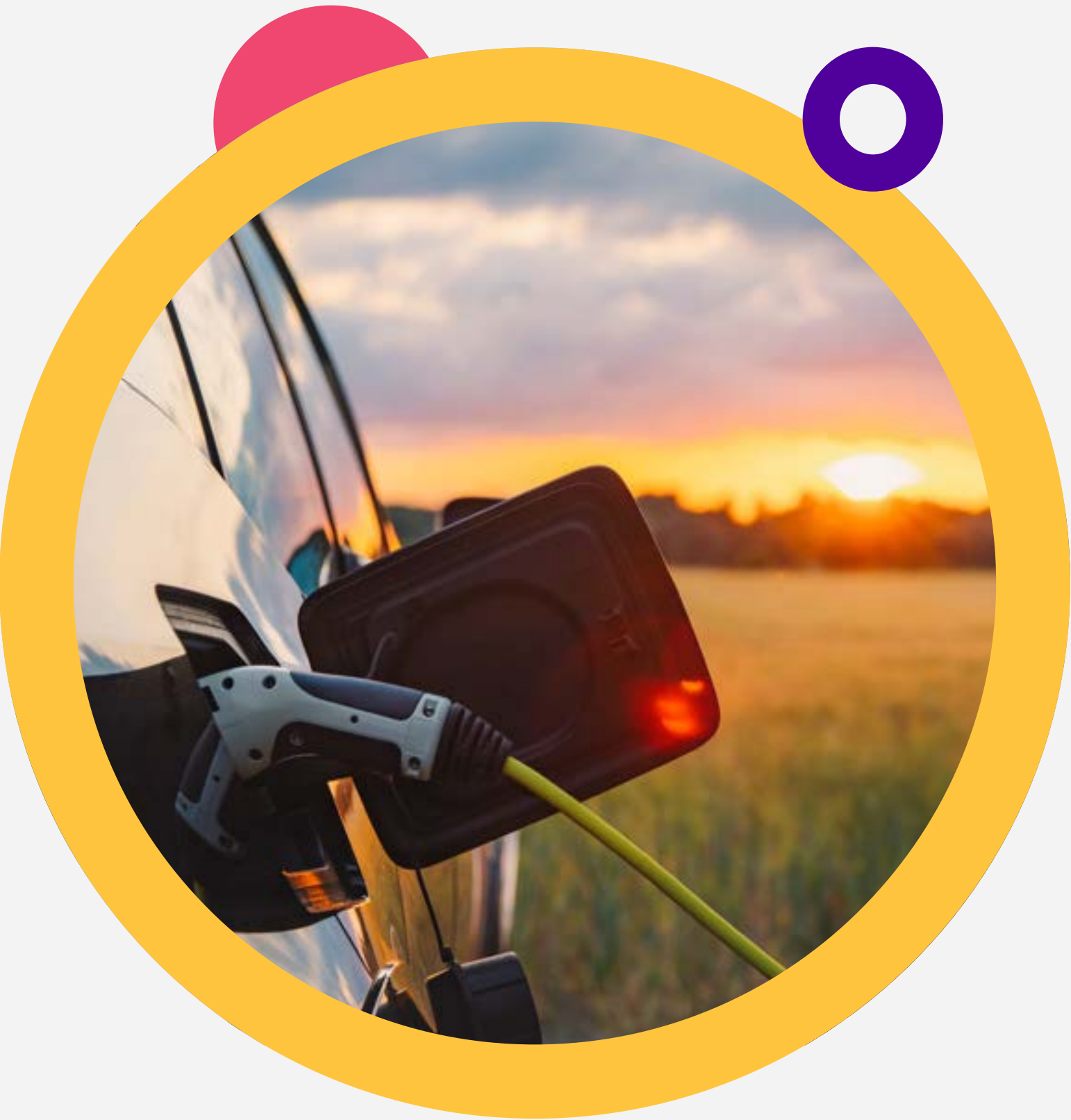
Waste reduction and circular economy

We are dedicated to minimising waste generation and implementing circular economy principles wherever possible, in alignment with our Environmental, Waste and Zero Waste to Landfill policies. This is supported by our efforts through the Investment Recovery Procedure, reuse of network equipment, purchase of second-hand network equipment and donations of redundant IT and office equipment. We are determined to go beyond waste diversion by incorporating sustainable practices within our design, development and operational phases, reducing our material footprint.

Following the acquisition of Lumen EMEA and its extensive network, we have significantly increased our stock of equipment. By reusing, recovering and redeploying this inventory, we will avoid unnecessary extraction of additional natural resources for manufacturing purposes. Where additional inventory is required, we seek to purchase second-hand equipment or extend the life of equipment via reuse. In 2024, we spent more than €5 million on 5,492 units of second-hand equipment and extended the life of 48,944 pieces of equipment via reuse. From 2023 to 2024, we saw a 14.5% increase in the reuse of our equipment.

Colt DCS currently has six sites working towards TRUE* Zero Waste certification, with plans to bring additional locations on board. To support this ambition, Colt DCS established stakeholder engagement forums and drawn up bespoke action plans for each site.

As our operational footprint grew following the integration of Lumen EMEA, total waste volume rose by 117% compared to 2023, rising to 1,207 tonnes in 2024. However, of the waste we did produce, 65% was recycled, 27% was sent for energy recovery, and only 8% went to landfill.

Colt Group waste generation by disposal type (tonnes)**

	2022	2023	2024	% 2024
Recycled	180	349	785	**65%**
Landfill	21	114	95	**8%**
Waste to energy	139	92	327	**27%**
Total	**340**	**555**	**1,207**	**100%**

2024 Colt Group waste generation by hazardous categorisation (tonnes)***

	Recycled	Landfill	Waste to energy	Total
Hazardous	430	0.002	0	**430**
Non-hazardous	355	95	327	**777**
Total	**785**	**95.002**	**327**	**1,207**

+14.5%
in reuse of equipment against 2023

*Total Resource Use and Efficiency is a zero waste certification program used by facilities to define, pursue and achieve their zero waste goals, cutting their carbon footprint and supporting public health.
**2022 and 2023 figures do not include waste data from Lumen EMEA.
***In 2024 waste data from Lumen EMEA have been estimated where not available. Colt Group is actively working to enhance data collection and improve data quality across all entities; 100% of Colt Group's hazardous waste is being sent to a recycling plant to be recycled. There is a low percentage of the materials which cannot be recycled but are safely managed by the facility.

Colt

Reducing electronic waste with 2econd Chance

We partnered with 2econd Chance, a UK-based computer recycling charity that provides work-based training in IT equipment refurbishment to people with physical disabilities, learning difficulties or social, emotional and mental health needs.

In 2024, we donated over 400 devices for refurbishment that will be resold at discounted prices to people in need and donated to local charities. 40 individuals with disabilities were trained using computers donated by Colt, accumulating a total of 663 hours of meaningful work. Additionally, 2econd Chance has generated £30,000 of revenue from devices donated by Colt, all of which was reinvested into the charity's efforts.

Colt

Awarded for our continued success with Urban Miners

In 2024, we continued our collaboration with Urban Miners, a metal recycling company in Sweden. We piloted this partnership in 2023, with success across Sweden and Germany. In 2024, we expanded our partnership across our European offices, including those in Spain, France, Denmark, Italy, Ireland, Germany and the UK.

In 2024, we were able to recycle over 590.5 tonnes of equipment, including Synchronous Digital Hierarchy (SDH) equipment (IT hardware), a significant increase from the 8.7 tonnes recycled in 2023. This saved almost 2,200 tonnes of CO_2 and an estimated 5,600 tonnes of virgin materials.

In recognition of our successful pilot, we won the circular economy transition of the year award for the EMEA region at the 2024 Environmental Finance Sustainable Company Awards. The award seeks to shine a light on companies that are actively driving change in their approach to responsibility and sustainability, pivoting their resources, operations and entire business models to align with or push past sustainability and climate targets.
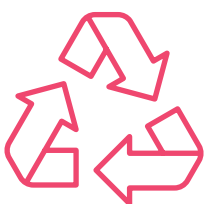
590.5
tonnes recycled in 2024
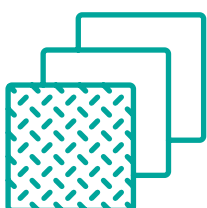
5,600
tonnes virgin materials saved in 2024 (estimated)

Environmental Finance
COMPANY Awards 2024
Winner
Circular economy transition of the year – EMEA

colt

Supporting our workforce

3 GOOD HEALTH AND WELL-BEING

4 QUALITY EDUCATION

5 GENDER EQUALITY

Our people and culture

Our employees matter and we recognise the value in ensuring they feel heard and that their feedback is acted upon. This is underpinned by our Listening Strategy, a comprehensive approach designed to ensure that feedback from our workforce is actively integrated into engagement plans and strategic decisions. Throughout 2024, we have gathered feedback through a variety of channels, including structured surveys, employee forums, focus groups, all-hands meetings and Q&A sessions. Where necessary, we launched additional targeted listening efforts to address unique needs within different locations and departments.

We issue our People Matters survey on an annual basis to all Colt Group employees. Highlights from 2024 included:

82% and 84%
of Colt and Colt DCS employees participated, respectively

83% engagement score, highlighting our employees's connectedness to the organisation, willingness to provide voluntary effort and feeling of support

81% belonging score

84% inclusion score

Our Listening Strategy focuses on truly understanding and responding to our employees

We have developed function and country-specific action plans to address key insights and focus areas, and will continue to deliver these actions. To further understand the composition and employee experience of our workforce on a global basis, the 2024 People Matters survey included additional questions on demographics and protected characteristics. The resulting insights were instrumental in shaping Colt's Diversity, Equity and Inclusion (DEI) strategy, which aims to build an inclusive culture (e.g. newly captured data was inclusive of information related to neurodivergence) and helped us to understand the impact of recent integration work across employee groups.

Colt

Our people-centric approach to navigate a successful integration

Since we began the integration of Lumen EMEA into Colt, we have placed a strong emphasis on cultural integration and transparent communication, aiming to build a cohesive, connected and supportive workplace.

From the beginning, we recognised the importance of understanding the cultures of both organisations. As such, we conducted a deep cultural assessment of Colt and implemented many initiatives including manager briefings, a manager playbook, a dedicated intranet welcome area, and our Culture Buddy Programme to support onboarding with over 1,200 sign-ups.

There's been a lot of effort throughout the organisation to bring people together. Our Connection Days, where Colties are encouraged to visit their local office to connect with purpose, and events with our employee networks have further strengthened new bonds.

To support our employees on a global level, we harmonised many of our key people processes, bringing Colties who joined from Lumen EMEA into Colt's established systems. This included the integration of processes related to compensation, performance management, recruitment and onboarding, learning platforms and mandatory training. Our employee networks have also been harmonised to help us to deliver a consistent and impactful employee experience across all functions and countries.

Our integration journey is ongoing, and while challenges are expected, our commitment to a people-centric approach has laid a strong foundation for its success. We will progress with a phased implementation plan for integrating contracts, on a country-by-country approach, and harmonising our global policies wherever feasible.

Colt DCS

Colt DCS awarded Data Center Workforce Initiative of the Year

Colt DCS was proud to be shortlisted for the Data Center Workforce Initiative of the Year at this year's DatacenterDynamics (DCD) Awards, which recognises initiatives that drive meaningful change and help bridge the workforce gap in the industry. This nomination reflects our commitment to fostering a sustainable, people-focused workplace that supports both individual career growth and the long-term success of our business.

At the heart of our submission was Activate, Integrate, Motivate (AIM) - our Talent Framework, launched in September 2023. AIM provides employees with clear career pathways, reinforcing our dedication to a strong Employee Value Proposition (EVP) and positioning Colt DCS as an Employer of Choice.

Colt DCS

Employee Value Proposition

In 2024, we launched the DCS EVP, a commitment to defining who we are and what makes DCS a great place to work. An EVP is more than just a statement. It represents the mutual commitment between DCS and its people, outlining why individuals join and stay. Our EVP was built from within, shaped by input from over 20% of our workforce to reflect our culture, values and ambitions.

The EVP is closely aligned with the AIM framework, designed with employees in mind to help connect and navigate their career journey. The three pillars of the framework (Activate careers, Integrate into the culture and Motivate performance) are underpinned by several existing and new activities and initiatives.

We have continued to nurture our 'One Colt' culture, supported by our values, and on creating an organisation with the skills and capabilities we need to respond to market shifts, evolving customer needs and advances in technology. As expected in any integration process, Colt's teams and organisational structures have undergone changes and to minimise uncertainty amongst employees, we have prioritised constant, clear and collaborative communication about these changes.

6,468
employees in 26 countries*

97.6%
of our employees are permanent*

32.1%
of Colt Group employees are female*

Colt Group employees in 2024 by geography*

6,468 total

- France 5%
- Germany 8%
- India 30%
- Japan 5%
- Spain 9%
- United Kingdom 24%
- Rest of Colt Group 19%
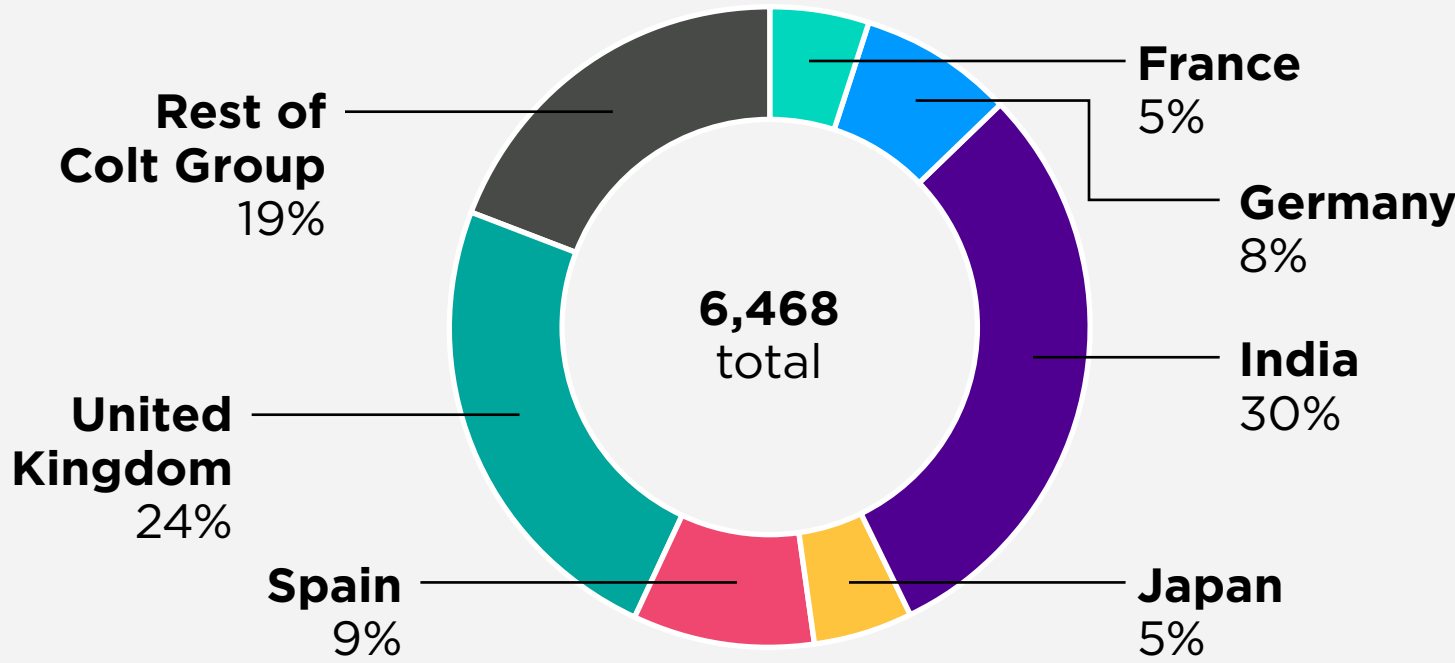
Colt Group employees by geography			
Country	2023	2024	Variation against 2023
France	322	324	0.6%
Germany	518	490	-5.4%
India	1,916	1,963	2.5%
Japan	340	336	-1.2%
Spain	609	600	-1.5%
United Kingdom	1,728	1,519	-12.1%
Rest of Colt	1,293	1,236	-4.4%
Total	**6,726**	**6,468**	**-3.8%**

Colt Group employees by gender*

2022 — 30.5% / 69.5%

2023 — 31.4% / 68.6%

2024 — 32.1% / 67.9%

- Female
- Male

*Notes:
- Rest of Colt Group includes: Austria, Belgium, Bulgaria, China, Denmark, Greece, Hong Kong, Ireland, Italy, Luxembourg, Netherlands, Poland, Portugal, Romania, Singapore, Sweden, Switzerland, South Korea, Turkey and the United States.
- Headcount as of December 31, 2024.
- 2023 and 2024 data include Lumen EMEA.
- Employees in this report refers to the following definition: the number of people employed by Colt Group, who are on Colt payroll, including the following person types: Employee, Apprentice - Europe only, Graduate Rotational, Contract Trainee, Fixed-Term Employee, Trainee, Student; excluding all contractors, apprentices in India and interns. This excludes Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy, as well as apprentices in India and interns. Inactive workers, i.e. those on long-term leave but still directly or indirectly employed by Colt Group in line with our employee definition, are also included. This represents a restatement of the information included in the previous report, as through 2023 we defined people employed by Colt Group in line with our internal Headcount Sourcing Policy which also included all contractors, apprentices in India and interns.

Colt Group employees in 2024, by geography and gender*

	France	Germany	India	Japan	Spain	United Kingdom	Rest of Colt*
Total	324	490	1,963	336	600	1,519	1,236
Female	30.6%	23.1%	26.3%	23.8%	41.2%	30.8%	44.7%
Male	69.4%	76.9%	73.7%	76.2%	58.8%	69.2%	55.3%
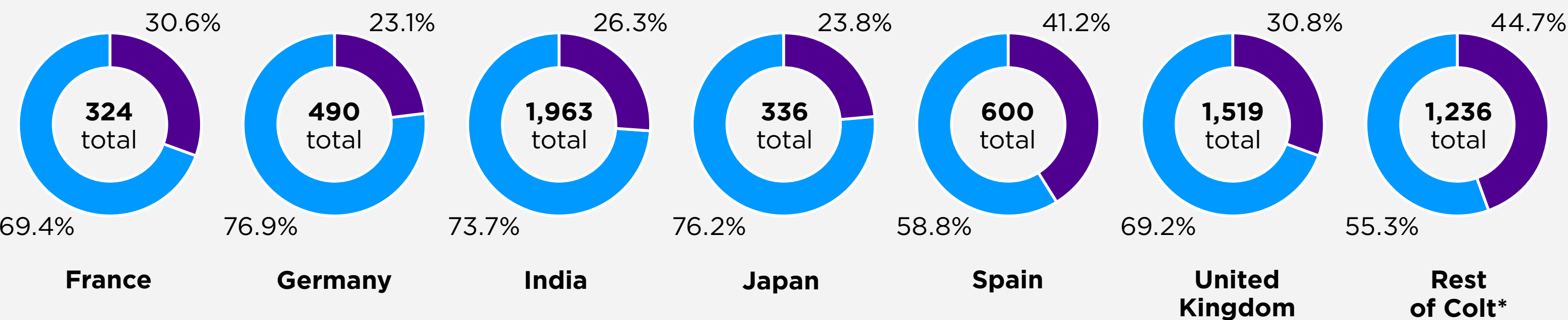
Colt Group new hires in 2024 by gender*

414 total
- Female 44.7%
- Male 55.3%

● Female
● Male

Colt Group new hires in 2024 by age*

Gen Z (born after 1994)	121
Gen Y (born between 1980-1994)	211
Gen X (born between 1965-1979)	75
Baby Boomers (born before 1965)	7
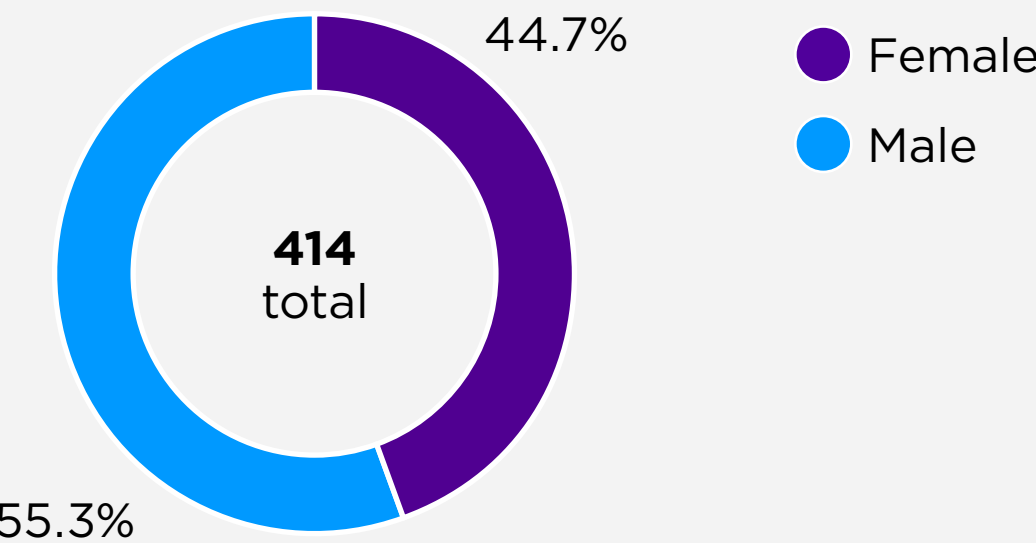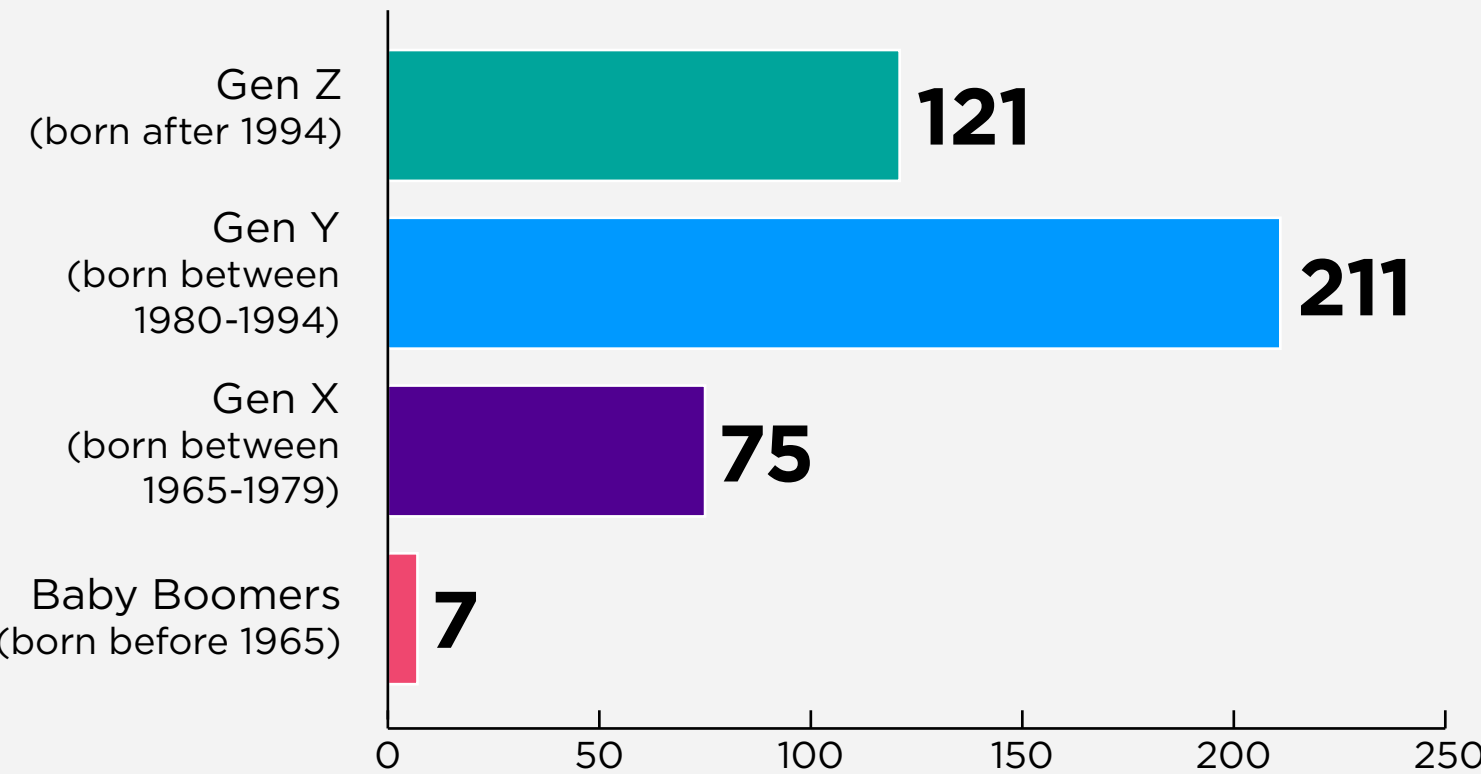
Colt Group turnover rate*

2024	9.9%
2023	8.6%
2022	13.4%

*Notes:
- Rest of Colt Group includes: Austria, Belgium, Bulgaria, China, Denmark, Greece, Hong Kong, Ireland, Italy, Luxembourg, Netherlands, Poland, Portugal, Romania, Singapore, Sweden, Switzerland, South Korea, Turkey and the United States.
- Headcount as of December 31, 2024.
- 2023 and 2024 data include Lumen EMEA.
- Employees in this report refers to the following definition: the number of people employed by Colt Group, who are on Colt payroll, including the following person types: Employee, Apprentice - Europe only, Graduate Rotational, Contract Trainee, Fixed-Term Employee, Trainee, Student; excluding all contractors, apprentices in India and interns. This excludes Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy, as well as apprentices in India and interns. Inactive workers, i.e. those on long-term leave but still directly or indirectly employed by Colt Group in line with our employee definition, are also included. This represents a restatement of the information included in the previous report, as through 2023 we defined people employed by Colt Group in line with our internal Headcount Sourcing Policy which also included all contractors, apprentices in India and interns.

Commitment to DEI

Our DEI strategy is designed to attract and develop the best and brightest talent from all walks of life and to create an environment where everyone feels empowered to make their mark. We achieve this using our three DEI pillars:

We run an extensive and active DEI programme with activities based on each pillar, including global programmes, active communities, roadmaps and initiatives. These activities sit alongside guidelines and policies, including:

Global Family Leave policy	Global Domestic Abuse policy
Global Transition at Work policy	Menopause Guidelines
Global Workplace Adjustments policy	Neurodiversity Guidelines

Leadership and culture

Our leaders are inclusive role models and drive a culture where we harness diversity of thought for greater success.
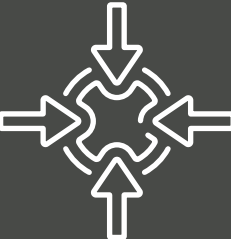
Equitable business practices

Employ equitable business practices that improve the employee experience and affect positive change.

Diverse representation

Improve the diversity of our workplace to ensure we represent the customers and communities that we serve.

Governance and impact
Ensure we have the governance in place to measure our success and maximise impact through industry collaboration.

We are dedicated to creating an inclusive workplace and cultivating a sense of belonging for our employees

We are proud of the strides made in recent years towards inclusion and diversity, but as a Group, we strive for continuous improvement. We are dedicated to enhancing our efforts to foster workplace inclusion through various memberships and accreditations.

Accreditations and memberships

The Tech She Can Charter	RACE AT WORK CHARTER	Valuable 500	Stonewall — Acceptance without exception
disability confident COMMITTED	#CHANGE THE FACE		MENOPAUSE FRIENDLY
Stonewall LGBTQ+ INCLUSIVE EMPLOYER GOLD AWARD 2023	Stonewall LGBTQ+ INCLUSIVE EMPLOYER TOP 100 2023	Stonewall LGBTQ+ INCLUSIVE EMPLOYER HIGHLY COMMENDED NETWORK GROUP 2023	Inclusive Employers
TC4RE Technology Community for Racial Equality	UN GLOBAL COMPACT		

Colt

Our inclusive practices receive a Bronze award from the Inclusive Employers Standard

Colt received a Bronze award from the Inclusive Employers Standard, a globally-recognised workplace accreditation and benchmarking tool for inclusion and diversity. This prestigious accreditation is a robust, evidence-based measure that has provided us with valuable insights into the progress made along our inclusion journey. We are particularly proud of the positive feedback received and have begun working on areas of future focus and improvement.

Colt

Training people managers in inclusive leadership

We launched an updated Inclusive Leadership Programme, focusing specifically on our people managers and tailored to address individual teams and cultural challenges.

The updated programme was piloted in India, where leadership teams attended a full-day session covering topics such as self-awareness, inclusive decision-making and how to support diverse teams. By the end of 2024, nearly 200 managers had attended these sessions, with around 50% continuing their journey by attending additional coaching circles.

In 2025, we will look for further opportunities to embed this training across other Colt locations.

Gender diversity

In the technology industry, approximately 27.6% of roles are held by women on a global scale. At the end of 2024, 32.4% of Colt Group employees were female, and 22.8% of leadership roles were held by females.

44.7%
of Colt Group's new hires were female in 2024

Through a focus on an inclusive approach to hiring and by promoting gender neutral job adverts, 44.7% of Colt Group's new hires were female in 2024.

Colt has established gender diversity targets. By 2030, we aim for women to hold 38% of all positions and 28% of senior roles.

In addition to measuring gender diversity, Colt has been running an internal campaign asking employees to voluntarily share their diversity demographic data to enable the establishment of a baseline to set further targets.

To further promote gender equality within Colt Group, we became a signatory of the UNGC's Women's Empowerment Principles in April 2024. We also joined the UNGC Target Gender Accelerator Programme and benchmarked our gender action plan using the Women Empowerment Principles Gap Analysis Tool. This helped us to see how Colt's Gender Action Plan compared to best practice and where we need to improve.

We've become a signatory of the UNGC's Women's Empowerment Principles

Colt

Inspiring allyship within our community

Through a series of listening circles, we identified avenues for men to be better allies for women and contribute to resolving gender inequities. The findings have helped us develop the next stage of our Allyship in Action initiative to embed inclusive behaviours into our workplace. This saw us launch an allyship event calendar with webinars focused on inclusive language and speaking up, as well as Brave Spaces, which are small group sessions for male allies.

300+
employees attended an allyship event

Over 300 employees attended an allyship event and 98% said they would recommend these to a colleague. The series was well received, with 88% of survey respondents stating that they felt the programme led to a more inclusive workplace. We also introduced our Allies in Action blog series to share stories of our allies' experiences and their impact.

Colt female percentage by job levels*

Job level	2023	2024	2030 target
Senior roles	23.1%	23.0%	28%
All levels	31.8%	32.4%	38%

● 2023
● 2024

Scale: 0 5 10 15 20 25 30 35 40

*Figures do not include Colt DCS employees. Percentage as of December 31, 2024. 2023 and 2024 data include Lumen EMEA.

Employee networks

1,300 employees are part of an employee network group

Our employee networks help us support a diverse workforce by giving everyone a voice and the opportunity to develop.

Women+ @Colt: Our women and allies network exists to promote diversity and gender balance at Colt, and engages with all employees to enable women to thrive. Women+ @Colt was Highly Commended at the 2024 Employers Network for Equality & Inclusion Awards as the Employee Network Group of the Year

Pride Matters: Our LGBTQ+ and Allies network strives to make us a more inclusive place, helping us drive the message that we embrace all identities. Pride Matters was awarded second place in the Outstanding LGBTQIA Network of the Year category at the 2024 British Diversity Awards

YOUnited: Exists to promote cross-cultural understanding and an environment where anyone can flourish regardless of their race, ethnicity, faith or cultural background

Disability Accessibility Network (DAN): Aims to raise awareness of visible and invisible disabilities and health conditions, and champion inclusion across Colt

Next@Colt: Focuses on the needs and aspirations of Colties early in their career, aiming to build connections and develop talent

By the end of 2024, 1,300 employees were part of an employee network, including 400 members in Next@Colt: our newest employee network.

Colt

Supporting transgender entrepreneurs in India

Transgender people experience unique barriers around the world. These are particularly challenging to address in India, where only 6% of transgender individuals are formally employed. To help combat this issue, we supported 32 transgender individuals in establishing their own businesses. These businesses include tailors, beauty salons, flower and vegetable stands, and home-based food services, allowing these entrepreneurs to create livelihoods for themselves.

Colt

Developing youth interest in tech careers

To increase youth awareness of and interest in careers in tech, Colt's YOUnited and Women+ @Colt employee networks organised eight volunteer events, engaging with over 400 students. Focusing on schools with underprivileged students in the London area, volunteers from Colt hosted workshops, attended career fairs and worked one-on-one with students. Through these events, students heard first hand from a diverse group of employees on career paths and what it's like to work in tech.

We invited students to tour Colt House for a two-day session with volunteers from across Colt. The feedback received from the students was overwhelmingly positive, with numerous comments highlighting how engaging and informative the trip was and that they were inspired to pursue careers in a Science, Technology, Engineering and Mathematics (STEM) field.

Accessibility

Our Accessibility Programme outlines a journey for Colt to build accessibility into our employee and customer experiences, which links with the Equitable Business Practices strategic area within our DEI strategy. In 2023, we created a five-year **Accessibility Roadmap**, which outlines a journey across governance, employee experience, awareness and skills, brand and reputation, and customer experience. We entered year two of the roadmap in May 2024 and we are on track to achieve what we planned by April 2025.

- ✓ We devised accessibility guidance for our developer community, Programme Management Office and product managers community

- ✓ We improved the process to request assistive technology tools, including screen readers and software to support neurodivergent colleagues via our IT request system

- ✓ We collaborated with the IT team to raise awareness of accessibility tools in Microsoft 365 and Windows 10 and 11

Neurodiversity

Throughout 2024, we elevated our efforts to better support our neurodivergent colleagues through our Neuroinclusion Programme, a comprehensive initiative aimed at enhancing neurodiversity awareness, training and providing support tools.

Awareness and education: Raising awareness about neurodiversity has been a priority. We contributed to the #ChangeTheFace research study in 2023, and in 2024, we developed a suite of resources, including guides for both employees and managers, offering valuable insights and practical advice on effectively supporting neurodivergent team members. We partnered with Uptimize to host fireside chats, further educating our colleagues about neurodiversity and fostering better understanding within the organisation.

Accessible environments: We have developed guidance to ensure our physical and digital spaces are accessible, including our office spaces, websites and apps. We've expanded our assistive technology catalogue, adding tools that aid with writing and focus for neurodivergent colleagues, and are currently exploring how we can use AI tools to provide further support.

Training and best practices: Our People and Culture function has undergone training to enhance recruitment and support for neurodivergent employees. By adopting best practices, we ensure appropriate adjustments are made to accommodate individual needs, helping us create a more inclusive work environment.

Colt

"It is our responsibility to create an inclusive and supportive environment for all employees. By fostering a culture of awareness and inclusivity, we can ensure that all team members feel valued and supported…"

— Catherine Leaver, Executive Leadership Team Sponsor of DAN

The Hidden Disabilities Sunflower Scheme

In May 2024, Colt House launched the Hidden Disabilities Sunflower Scheme to promote inclusivity and awareness for individuals with non-visible disabilities. This initiative underscores our ongoing commitment to fostering an inclusive and supportive environment for everyone. As part of the rollout, we made sunflower lanyards and pin badges available at reception for both employees and visitors. The sunflower symbol discreetly indicates that an individual has a non-visible disability or health condition, signalling the need for support or understanding without requiring an explanation.

To further reinforce our commitment to inclusivity, we introduced ally versions of the lanyards and pin badges.

This enables Colties to demonstrate their support for the scheme and individuals with hidden disabilities, promoting a culture of empathy and awareness within our organisation.

The successful launch of the scheme at Colt House led to its expansion to 10 additional offices across multiple countries, including Belgium, Germany (Düsseldorf), Hong Kong, India (Gurgaon & Bangalore), Japan (Tokyo), Romania (Sibiu), Singapore, Spain (Almeda) and the UK (Basingstoke). Building on this momentum, we plan to extend the Sunflower Scheme to all our offices in 2025, ensuring lanyards are readily available in every location.

Training and professional development

We are invested in attracting and retaining a high-performing, diverse workforce by developing their skills, knowledge, competencies and confidence. Colt Group's training and development programme is a combination of compliance training and technical skills training, complemented by personal development, business skills and leadership training.

Colt Group is committed to upholding the highest ethical standards to meet our customers' needs and maintain high standards of compliance. To support this, all employees are required to complete mandatory training in a range of areas, including Business Continuity, Data Protection, Conscious Inclusion, Action on Environmental Sustainability, the Code of Business Conduct, Security Awareness, Prevention of Sexual Harassment in the Workplace (PoSh), Brand and Vision and Health and Safety. By providing this training, we ensure that all employees are equipped to protect our business from legal, commercial and reputational damage and drive our commercial success in an ethical manner.

We are invested in the growth and development of our workforce

2024 mandatory training completion rate		
Training	**Colt Group employees**	**Colt Group employees (new joiners)**
Business Continuity	99.5%	99.4%
Conscious inclusion at Colt	99.3%	100.0%
Prevention of Sexual Harassment in Workplace*	99.5%	98.0%
Security Awareness at Colt	99.0%	98.8%
Code of Conduct	97.2%	99.4%
Data Protection	99.3%	100.0%
Brand and Vision training**	99.5%	99.2%
Health and Safety**	94.1%	97.3%
Action on Environmental Sustainability*	99.7%	99.7%

*Colt employees joining from Lumen EMEA did not participate in this training in 2024.
**Training not provided to Colt DCS employees.

We recognise that our employees' needs change over time, including those related to training and professional development. To support these evolving needs, we introduced several new training areas for Colt employees in 2024, including:

→ **Meaningful Performance Conversations:** To support year-end performance management reviews, we trained 92 individuals on the key skills required for having meaningful performance conversations.

→ **Inclusive Leadership:** To support our Gender Action Plan, we trained 285 leaders in India on goal setting and creating career pathways to develop leadership behaviours for equity, monitoring and managing biases, being an effective sponsor for women, and creating an inclusive culture.

In addition to scheduled training, we have invested in platforms that enable people to access training resources whenever they like. In 2024, we provided employees with access to an additional platform, Percipio, which provides technical training not available on other platforms. Training platforms available to employees include:

Colt Excel: Our learning portal for customer-facing teams includes over 1,500 assets

LinkedIn Learning: Over 5,000 hours spent on training, with more than 4,000 employees participating across Colt Group

Percipio: Made available for the first time in 2024, our employees completed 4,750 hours of online technical training on the platform that year

Globesmart: An additional 223 Colties joined the platform compared to last year, increasing our employees' cultural awareness and supporting improved collaboration

In addition to including new employees from Lumen EMEA in relevant mandatory training, we provided training and resources to support team integration. Managers participated in face-to-face Team Integration Workshops, and all employees had access to a self-service integration toolkit. Designed to help new team members quickly achieve high performance, the toolkit aimed to develop trust among team members and help them master conflict resolution, decide on and commit to actions, support and challenge each other, and drive results effectively.

Colt

Technical training

Our Technical Training Team, which oversees the Colt Technical Training Academy, has made considerable progress in ensuring our employees are well-trained with the tools we use, enabling them to perform at their best.

The academy is a community that provides access to in-house technical webinar recordings and training material, eLearning content, bite-sized learning videos, and relevant content from Colt subject matter experts and external vendors.

2024 highlights:

2,983
people trained in live technical training sessions

2,448
people trained through the Inventory Transformation – Amdocs training programme alone

49
new technical training courses designed and delivered across four major business-critical programmes

69%
increase in number of new technical training courses developed by the Colt Technical Training Team (variation against 2023)

4,750
technical learning hours facilitated by the Colt Technical Training Team

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Colt

Our award-winning leadership training programmes

For over three years, we have invested in training programmes designed to support managers and leaders, including our highly successful Stepping into Leadership programme. Focused on supporting first-time managers, 71 individuals participated in over 1,400 hours of innovative training, including blended learning and gamification.

Stepping into Leadership was awarded Gold and Silver at the 2024 Brandon Hall Group™ Excellence Awards, a testament to our outstanding contributions to developing our first-time managers and our commitment to fostering a culture of continuous growth and improvement.

Colt

Hosting our first Learning at Work Week

In 2024, Colt organised Learning at Work Week to support employee personal growth and development. We hosted an exciting schedule of events to inspire our employees to think about planning their career next steps. During the week, we partnered with the Business Continuity and Accessibility teams, we invited our leaders to share their career stories, and we engaged with our different learning partners to share about Learning at Colt and the resources that are available. At the end of the week there was a focus on coaching and mentoring, and how Colties can take charge of their career.

More than 1,500 employees participated in the event and, going forward, we plan to host Learning at Work Week on an annual basis.

Colt DCS

MyLearningHub
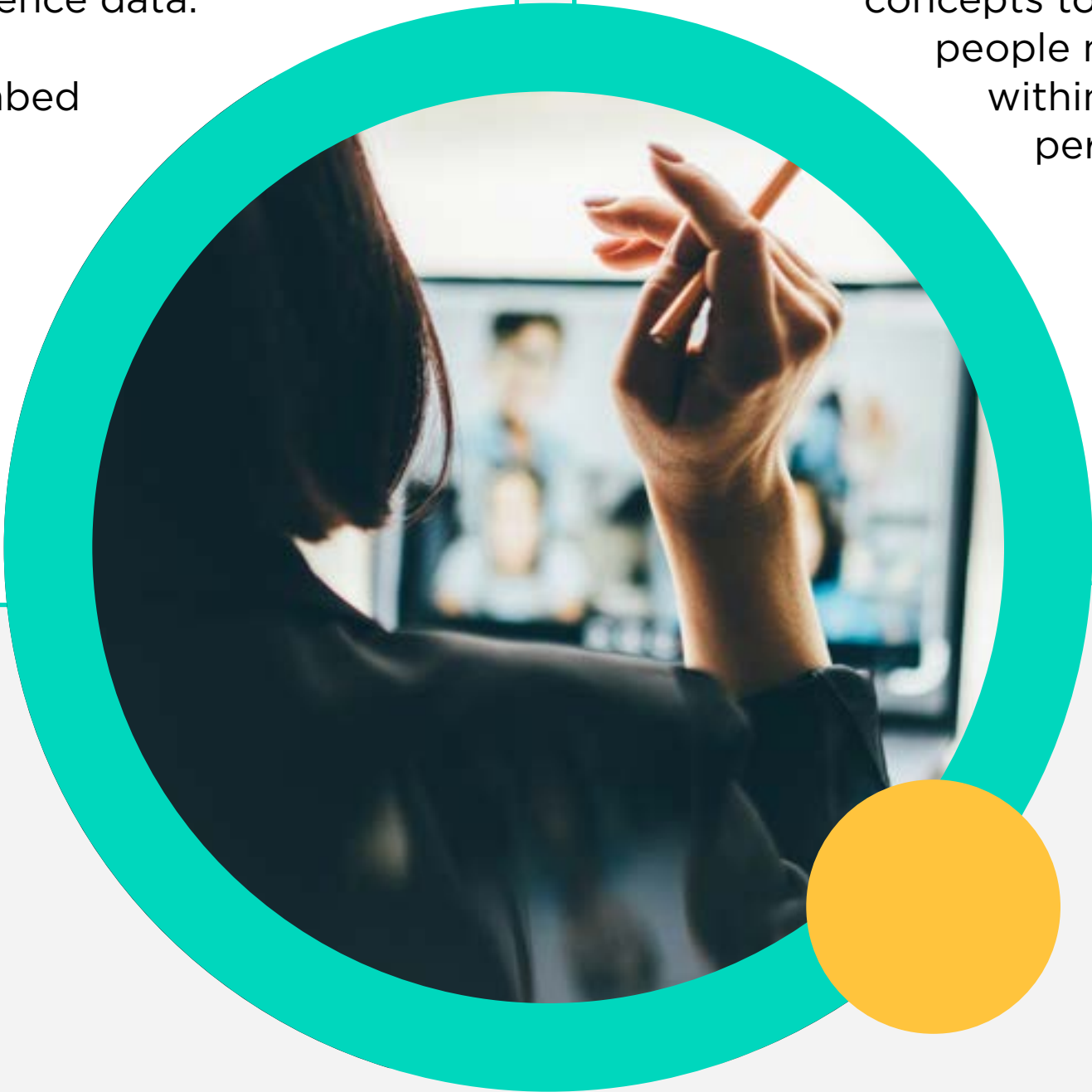
In November 2024, we partnered with a leading skills-based learning provider to support continuous learning and professional development at Colt DCS. MyLearningHub empowers our people to understand, measure and build their key skills, both now and for the future. This innovative platform provides personalised learning at scale, through AI-powered content recommendations and skills intelligence data.

For 2025, our focus is to further embed MyLearningHub across Colt DCS. Our Talent Development Specialist and group of dedicated Learning Champions represent learning on behalf of their functions and will continue to curate relevant and engaging learning content to support ongoing skill development.

Colt DCS

Management Matters

Following the successful launch of the Management Matters programme in 2023, Colt DCS has developed an online toolkit for people managers to support their ongoing learning after attending the in-person training. The toolkit contains a wealth of blended learning resources such as material from the training, along with relevant video content and articles to help bring the key concepts to life. These resources assist our people managers to apply their learning within their teams and drive a high-performance culture.

Colt DCS

MentorU

Launched in 2023, MentorU is a programme designed to match new employees with mentors, fostering valuable mentorship relationships. This initiative provides mentees with the opportunity to gain knowledge, skills and insights from their mentors, enhancing their professional abilities. Mentors play a crucial role in guiding mentees through their career paths, helping them set goals and offering support in navigating various career challenges and decisions. MentorU has seen significant success, with 51 mentorship matches graduating in 2024. Looking ahead, the programme continues to grow, with 15 new matches already paired. This ongoing initiative demonstrates our commitment to professional development and support within the organisation.

Colt DCS
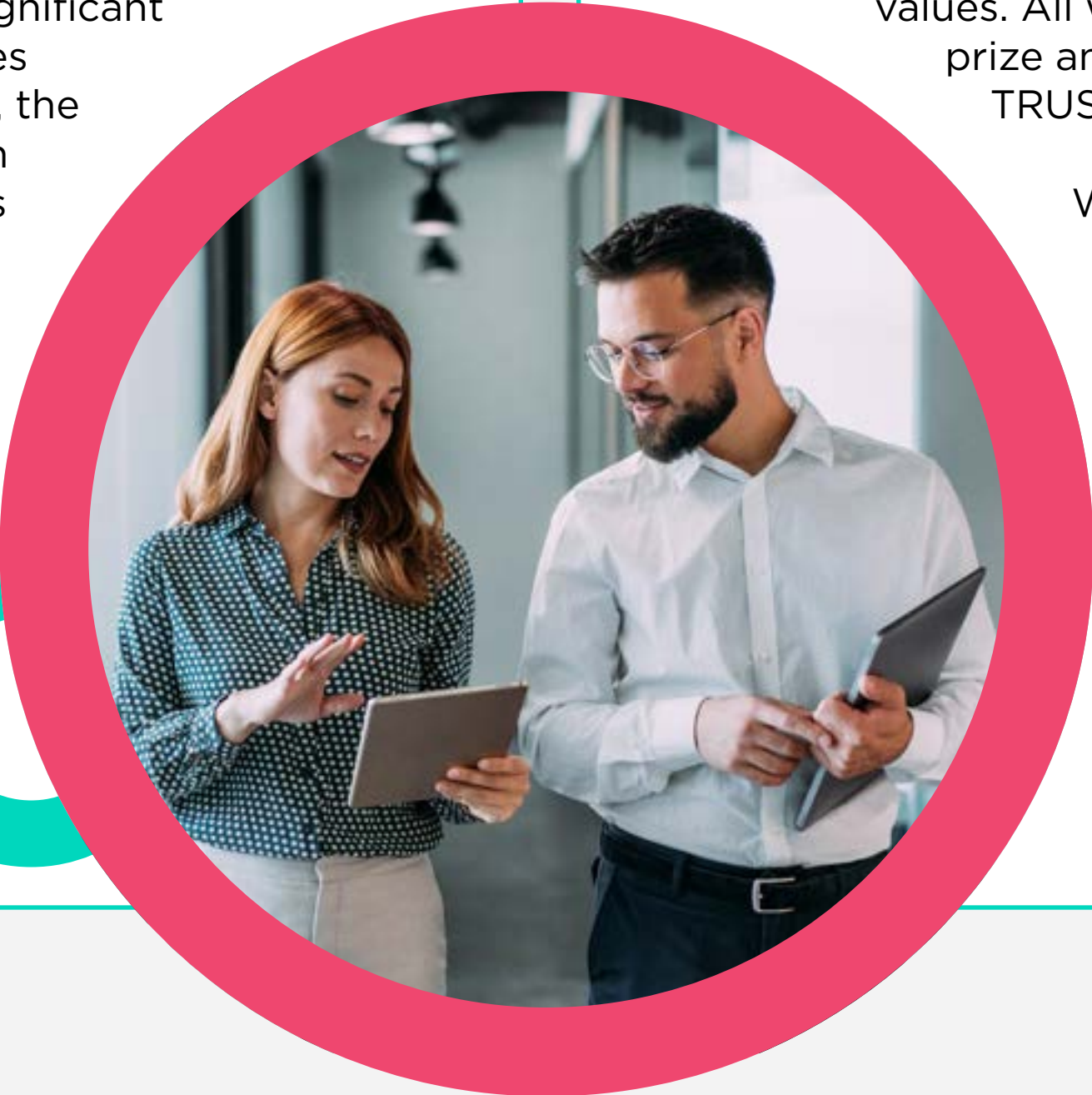
Recognising talent

Inspire, our recognition platform, continues to be an important tool to celebrate employees' efforts and behaviours. We saw a record number of eCards and TRUST Ambassador awards sent across the business in 2024. We relaunched our quarterly TRUST GURU awards, where up to 15 employees across the business are selected by our Senior Leadership Team (SLT) for displaying the behaviours from one of our TRUST values. All winners receive a monetary prize and a nomination for our annual TRUST Guru Awards.

We also saw a 194% increase in the number of nominations for our annual TRUST Hero Awards. The SLT rigorously assessed all nominations to agree on the winners. For one of our values, the SLT were unable to decide on a single winner and instead decided to award six winners, compared to the usual five. This is a testament to the brilliant work and dedication our colleagues have shown throughout 2024.

Colt

Addressing attrition rates among women in entry-level roles in India

Through listening circles, we learned that many women in entry-level roles at Colt in India desired clearer career paths. Therefore, we designed the Aspire2Tech reskilling programme to help women transition into technical roles within the company, or assist those already in technical roles through strengthening their existing skills to support career progression.

The programme ran alongside participants' existing jobs and lasted six months, with three months of support provided following programme completion. The initial cohort included 32 participants who were given personalised learning paths that included taught modules, on-the-job skills development and mentoring circles. Due to the programme's positive impact in fostering a more inclusive and diverse technical workforce at Colt, and positive feedback received, the Aspire2Tech programme will continue in 2025.

Female attrition in Colt India dropped from 9.7% in 2023 to 6.6% in 2024

100% retention of our 2024 Early Careers cohort

Early Career Programme

Colt's Early Career Programme is designed to recruit and develop the next generation through internships, apprenticeships, graduate schemes and early career roles. We hired 37 individuals from the 2024 Early Career Programme cohort, with graduates, apprentices and other Career starters joining Colt from 10 countries around the world. Approximately half of these employees joined our Operations and Engineering team, with the other half joining Commercial, Digital and Information, General Counsel and HR. We are proud to report for this cohort a retention rate of 100% (19% more than the industry average of 81%) and feedback from our 2024 graduates was highly positive, with an overall average satisfaction score of 8.8 across all categories. Highly scored categories include:

Despite the organisational changes Colt was undergoing during the programme, resilience from both managers and graduates ensured a consistently supportive experience, highlighting the programme's strength and adaptability.

At Colt DCS, we continue to cultivate the next generation of data centre professionals through our graduate programme. Typically, between one and four new graduates join each year, spanning multiple industries including engineering, operations, finance, legal and real estate development. In 2024, our programme in Europe and Japan was complemented by our first graduate intake in Mumbai. Colt DCS is also engaging with new hires via apprenticeship schemes, offering an additional pathway into the business via vocational courses.

Colt DCS welcomed its first-ever work experience student in 2024, marking an exciting milestone in our commitment to developing future talent. As a growing business, we recognise the value of providing hands-on learning opportunities and are proud to open our doors to students seeking real-world industry experience. This is a new initiative for us, and we are keen to explore further work experience placements, reinforcing our dedication to supporting early careers and inspiring the next generation of talent.

	Average
Managerial support	9.28
Training and development	8.54
Work environment	8.85
Graduates reported strong satisfaction with the Early Careers team	8.81
Graduates expressed high confidence in recommending Colt as an employer	NPS 68

Health, safety and wellbeing

We are committed to designing and implementing a comprehensive health and safety management system that identifies legal compliance requirements and risks, and delivers mitigation measures in a consistent, effective and transparent manner, following the principles of ISO 45001.

Colt Group's Health and Safety Policy Statement sets out our commitments to effectively manage and safeguard the health and safety of our employees, contractors and any others who may be affected by our activities. Our Health and Safety SteerCo oversees key business areas in the management of our occupational health and safety management system (OHSMS).

In 2024, we initiated a programme to improve the health and safety management of subcontractors at Colt premises or working on Colt's behalf. This included upgrading our Vendor Risk Management (VRM) procurement system and improving the dissemination of health and safety information to third parties. We also increased our health and safety inspection regime and are developing specialised training for operational staff responsible for managing third parties.

Our global health and safety training was issued to all employees, and we will roll out updated training in 2025.

Colt

MAZ Healthy Company Award

Colt's operations in Spain were awarded a prize in the 10th edition of the Mutual Accident Insurance Company of Zaragoza (Mutua de Accidentes de Zaragoza – MAZ) Health Company Awards, an acknowledgement of Colt's work to promote health and wellbeing.

Colt Group is aligned to ISO 45001 for occupational health and safety management

Recordable work-related injuries in Colt Group*

	2022	2023	2024
Rate of recordable work-related injuries (per 1,000,000 hours worked)	**0.3297**	**0.3251**	**0.5965**
Recordable work-related injuries	**3**	**3**	**7**

*2022 and 2023 data does not include Lumen EMEA. The acquisition of Lumen EMEA increased the total number of Colt Group employees and, in 2024, the total number of recordable work-related injuries increased. Still, our accident rate remains very low given the total number of employees.

We continue to prioritise our Global Mental Health and Wellbeing policy, which offers guidance and advice to our employees on issues around mental health and defines our approach to providing an inclusive and supportive environment. Through our Employee Assistance Programme, confidential support, resources and information are available to all employees to support their personal and professional lives. In 2024, we enhanced existing structures by:

✓ Raising awareness of wellbeing resources and developing new tools to support employee wellbeing

✓ Training managers to better support employee wellbeing and foster a healthier work environment

✓ Equipping our 75 global Mental Health First Aiders with additional tools and knowledge to effectively support others

✓ Implementing targeted wellbeing initiatives that address functional and region-specific needs

Colt DCS

Health and safety at our data centres

In 2024, our EHS and Technologies teams have been working closely together to develop a new system for notification and reporting of health, safety and environment (HSE) incidents using our Cherwell Service Management (CSM) portal, which was introduced in 2020 to manage and create incidents tickets and service requests. Training was provided by regional HSE managers and an eLearning module was released via our learning platform.

The utmost priority for Colt DCS in the development of new data centres across the globe is the health and safety of our employees, partners and all individuals engaged. Key examples of safety control measures and protocols we implement to reduce risk during development are:

- Implementing Method Statements (MS) in High Risk Activity (HRA) meetings
- Ensuring that Protective Personal Equipment (PPE) is available and used
- Creating and communicating safety rules & guidelines
- Conducting safety training sessions
- Fulfilling equipment inspection and maintenance protocols
- Introducing inter-work coordination and safety awareness sessions
- Conducting daily on-site patrols to identify safety risks with countermeasures in place
- Ensuring safety pathways for all workers and vehicles
- Adopting worker-oriented site management through activities of the Foreman's Association

Colt DCS

Strengthening wellbeing through partnership with MYNDUP

To strengthen our wellbeing offering and to continue creating an environment where employees feel valued, supported and empowered to achieve their best, both professionally and personally, we launched a partnership with MYNDUP. This is a wellbeing and coaching service that offers virtual one-to-one sessions with qualified practitioners, offering a library of helpful resources from career coaching to meditation. We chose this service to support our colleagues in their self-development journeys, providing them with coaching and tools to enhance the areas that matter most to them.

colt

Driving social impact

| 4 QUALITY EDUCATION | 8 DECENT WORK AND ECONOMIC GROWTH | 10 REDUCED INEQUALITIES | 17 PARTNERSHIPS FOR THE GOALS |

Supporting our communities

Our Global Social Impact Strategy focuses on the promotion of digital inclusion and STEM education, aligning with our purpose, values and the UN SDGs. We have focused on supporting the development of digital skills and STEM education for disadvantaged children and youth, and other underrepresented groups. Our CSR programme supports the global strategy at the local level, through collaborations and engagement with local NGOs, educational entities and charities that support vulnerable groups.

We encourage employees to participate in local volunteering, allowing each employee to spend two days annually on philanthropic activities. During 2024, as part of our CSR and Social Impact Strategy, we significantly increased our support, providing more than double the financial contributions and almost 20% more volunteer days than in 2023.

In March 2024, we implemented central governance over the CSR budget, allocating funds for donations and volunteering activities to local CSR Teams. Within this initiative, each country with a Colt office received a budget based on the size of the office and country, with smaller offices receiving a minimum fixed amount. To increase our impact, we also introduced a streamlined central approval process and hold monthly meetings with CSR leads.

€564,940
donated to 67 charities in 2024*
(113.8% increase from 2023)

1,033.5
days volunteered in 2024
(19.2% increase from 2023)

Our Global Social Impact Strategy focuses on digital inclusion through the development of digital skills and STEM education

*According to India's 'Companies Act, 2013', it is mandatory for all companies to contribute 2% of its profit towards CSR activities. Figure includes this amount.

Colt

Colt

Colt DCS

Colties come together for our largest fundraising event of the year

In September 2024, following a five-year break, we hosted our largest fundraising event in recent years: the Colt Charity Bike Ride. Over 140 riders from Colt and its sponsoring companies, supported by over 50 crew members, cycled from Brussels to Düsseldorf, covering 450 kilometres over four days.

Colt riders raised funds for 22 worthy causes, with each Colt country choosing a local charity to support. Charities were chosen in line with Colt's Social Impact Strategy. Over €112,000 was raised, boosted by €222,982 in matched funding. Alongside this initiative, the Colt Charity Challenge, which prioritises educational initiatives focusing on digital inclusion, technologies and STEM education with a special focus on vulnerable children and youth, also contributed to the fundraising pot.

Expanding Ignite Hub's impact

Ignite Hubs, a London-based charity that provides accessible, inclusive STEM education to young people aged seven to 18, including girls, children with special educational needs and disabilities, and those from disadvantaged backgrounds.

Colt's contributions supported Ignite Hubs to increase its student reach from 130 students in 2023 to 200 students by the end of 2024, facilitating strategic investments in digital infrastructure (including a website redesign, an Online Learning Platform focused on coding and technology skills, and the beginning of a mentoring platform to connect students with technology professionals), and creating a STEM career book on cyber security (to be launched in July 2025). With continued support, Ignite Hubs now delivers 11 classes per week, including six remote classes and four in-person classes at libraries across Southwark.

Community Art Project for our new London Hayes Data Centre's facade

UK: Community Art Project - Students of the Guru Nanak Sikh Academy Limited (GNSA) were invited to design a public artwork for our new London Hayes Data Centre's facade, enhancing the Hayes skyline. The project challenged students to produce artwork relating to pixelation, digital connection, or technology. Following several workshops a steering group shortlisted student teams from 11 submissions. Each team presented for five minutes, followed by a Q&A and reflections. The steering group then shortlisted three finalists, who will now refine their artwork for final presentation to the London Borough of Hillingdon.

Colt

Information and communication technology education for young people with Autism Spectrum Condition

Through the Colt Bike Ride fundraising and match funding, we provided more than €26,000 to De Lift Education, our charity partner in Belgium. De Lift Education provides secondary school education for young people with Autism Spectrum Condition, including tailored learning experiences with an emphasis on informatics. Lessons focus on ICT subjects and communication skills, aiming to give young people a lift into the future.

Colt

Lowering barriers into the tech industry for refugees, migrants and women

In partnership with Open Cultural Centre in Spain, Colt supports several initiatives, including Migracode, a provider of coding education for people with a migrant background in Barcelona, and CodeWomen, a community that supports women in the tech industry. Together, through their network of volunteers, these organisations bridge the gap between the technology sector needing skilled employees and underserved groups of people who are eager to learn new skills and work.

Colt
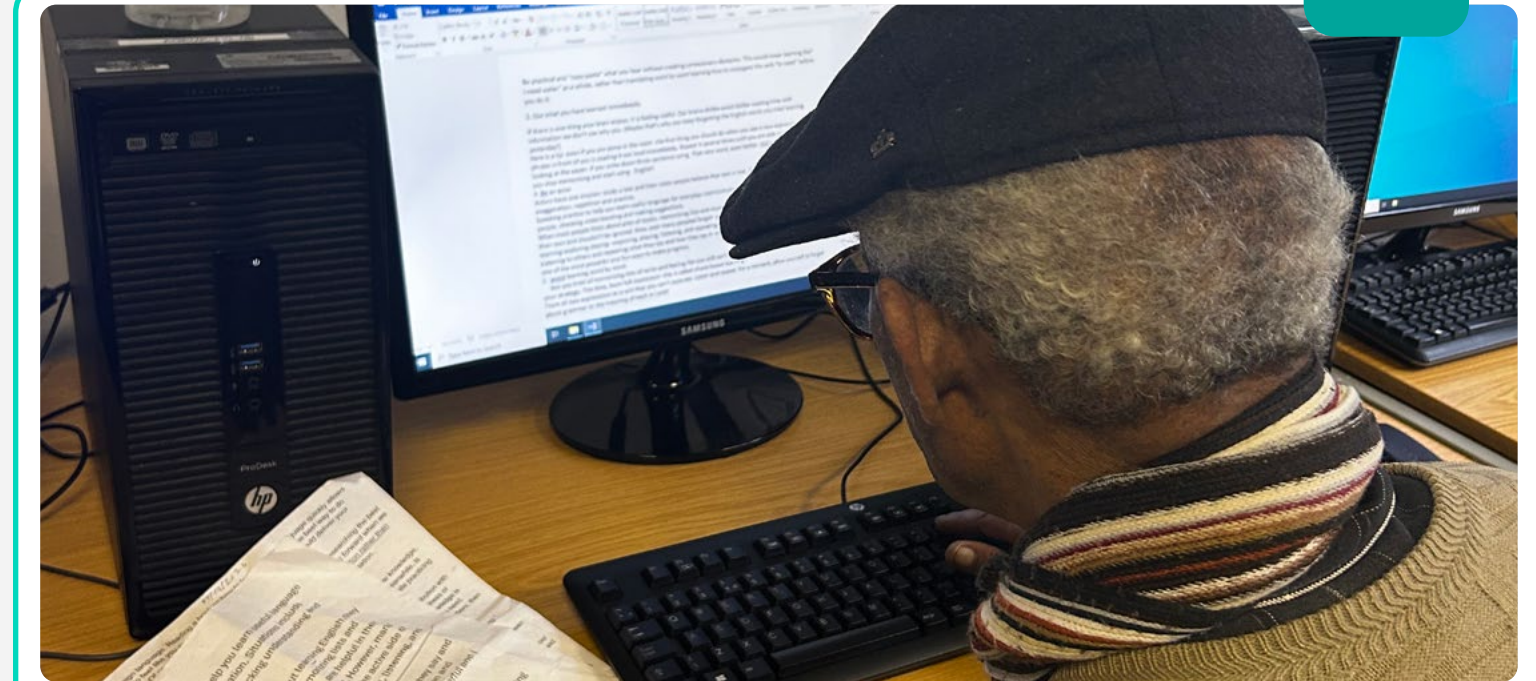
Helping our ageing community navigate new skills

We donated £35,000 to Age UK Hammersmith & Fulham's Digital Service, which was used to train and support 175 elderly individuals with developing basic digital skills through over 300 one-to-one sessions. Our contribution also supported groups that will continue to meet following the formal training, providing participants with an opportunity for continued learning in a group setting.

Global volunteering

Belgium

Ongoing support for Het Balanske, a charity assisting families with disabled children, including a variety of leisure activities, IT support and more.

France

Employees organised a food collection for Coeur de Lieusaint, a humanitarian association for community work to support those in need.

Netherlands

The local CSR Team participated in Amsterdam City Swim, a yearly event where participants swim 2km in Amsterdam's canals to raise money and support the battle against Amyotrophic lateral sclerosis (ALS). Colt participants raised a total of €1,814, including €750 from Colt.

Denmark

The CSR Team in Copenhagen donated old monitors to the Ukrainian Refugee Centre charity shop, aiding those seeking refuge in Denmark.

United Kingdom

Throughout the year, several volunteering activities were organised with Hackney Outdoors to enhance outdoor and green spaces at nearby schools.

Romania

The ESTE Film Festival takes place every year in Sibiu, and the local CSR Team sponsored a special screening for children and sent 400 invitations to children from local orphanages.

Japan

In collaboration with our long-term charity partner YouMeWe, the CSR Team volunteered at a local orphanage. Together with our COO Buddy Bayer, they conducted a class on the history of the internet and how it works.

Portugal

19 volunteers from Colt participated in a beach clean-up, collecting 52kg of waste.

China

The CSR Team in Dalian organised a donation to Dalian Disabled Training Centre through our charity partner, Dalian Youth Development Foundation. This donation provided educational resources and work equipment. Additionally, the local team supported two university students' tuition fees.

Spain

The CSR Team in Madrid, along with the local charity OlVIDAdos, collected essential supplies for individuals affected by severe floods in Valencia. A group of volunteers went to the most affected communities to provide direct support.

Poland

A laptop raffle was held for the Bike Ride charity, resulting in the distribution of 50 devices to new homes. The funds raised enabled young women in challenging life or financial situations to receive year-long scholarships for future skills development.

Italy

Employees volunteered at a Christmas market to support SOS Bambini; proceeds raised financed 'Aspettando la scuola', an integration project for four to-five year-old-children in Milan.

India

In partnership with NGOs IamGurgaon and Saytrees, efforts were made to restore the green habitats in Gurgaon and Bangalore. Over the past seven years, volunteers from Colt have planted more than 27,000 trees, aiding CO_2 reduction and climate change mitigation through urban afforestation to create mini forests in cities.

Hong Kong

Colt Hong Kong was awarded the 'Caring Company Award' for the 9th consecutive year, demonstrating the local team's ongoing commitment to sustainable development and social impact.

colt

Responsible business practices

Our Board

We are fully dedicated to transparent governance structures that ensure Colt Group is effectively managed, offering a strong foundation for our continually improving ESG performance and caring for the people who work for, with and around our business.

The Board of Colt Group Holdings Limited makes decisions affecting Colt and Colt DCS. On 31 December 2024, the Board had eight members, five women and three men.

Colt Group Board members

Total: **8** members

6 non-executive   **2** executive

The Board now has five subcommittees:

01 DCS Committee (also known as the DCS Board)

02 Colt Audit Committee

03 DCS Audit Committee

04 Colt Renumeration Committee

05 DCS Renumeration Committee

In 2024, the Audit Committee was split into the Colt Audit Committee and the DCS Audit Committee, allowing for more effective governance following Colt DCS's separation from the Group in 2023. Each Audit Committee reports any potential risks quarterly, creating an open avenue for discussion when concerns arise.

To broaden its focus to address all aspects of ESG, the former Environmental Sustainability SteerCo was transformed into the ESG SteerCo at the end of 2024. This change aims to ensure a more comprehensive approach that encompasses not only environmental considerations, but also social and governance factors, in line with Colt Group's broader ESG strategy. The ESG SteerCo, an executive-level committee co-chaired by the CEOs of Colt and Colt DCS, remains responsible for meeting annual targets and ensuring that Colt employees meet the sustainability goals in their objectives. The Committee meets as a minimum twice per year and is responsible for agreeing and approving Colt's overall sustainability strategy and policies.

Business ethics

At Colt Group, we are committed to upholding the highest legal and ethical standards, conducting our business with transparency and integrity. We strive to foster integrity and trust within our operations, with our partners and across the wider industry. Colt Group's **Code of Business Conduct** sets out the way we do business. It covers our standards and commitments towards ethical conduct, anti-corruption, anti-bribery, anti-fraud, conflicts of interest, whistle-blowing and legal compliance. In 2024, we made several updates to our Code of Business Conduct, including additional guidance on declaring conflicts of interest, confidentiality of reports, and clarity on how to report actual or suspected breaches of the Code.

Our policy is to foster a genuine culture of adherence to all laws, rules and regulations wherever we operate, ensuring that we conduct our business with the highest ethical standards and fulfilling our legal responsibilities. Everyone working for Colt Group is responsible for complying with these standards, and all employees must complete mandatory training on the Code of Business Conduct every year.

The Colt Ethics Committee and Colt DCS Governance Committee are responsible for reviewing any suspected compliance breaches. Additionally, these Committees organise one activity each month to raise awareness about the importance of ethical behaviour, adherence to the Code of Business Conduct, and how employees can report actual or suspected breaches of the Colt Group Code of Business Conduct. The Colt Board's Audit Committee oversees the Colt Ethics Committee and Colt DCS Governance Committees regarding breaches or suspected breaches of the Code. We encourage employees to raise breaches of the Code of Business Conduct through the independent Business Ethics Line or by reporting to the Colt Ethics Committee/Colt DCS Governance Committee. We have structures in place for anonymous whistleblowing wherever it is permitted by local law.

We established a central Compliance team in 2024, responsible for embedding compliance governance into our high-performance culture, integrating it into our business-as-usual processes and frameworks, and driving ownership of compliance to ensure proactive adherence to both internal and external regulations.

Upon appointment, members of the Colt Group Board and its subcommittees receive training around their duties. The Colt Group Board and its subcommittees are fully aware of the UK Companies Act 2006 duty to declare a conflict of interest in any matters presented to them. Related parties' transactions are independently assessed as part of the statutory audit.
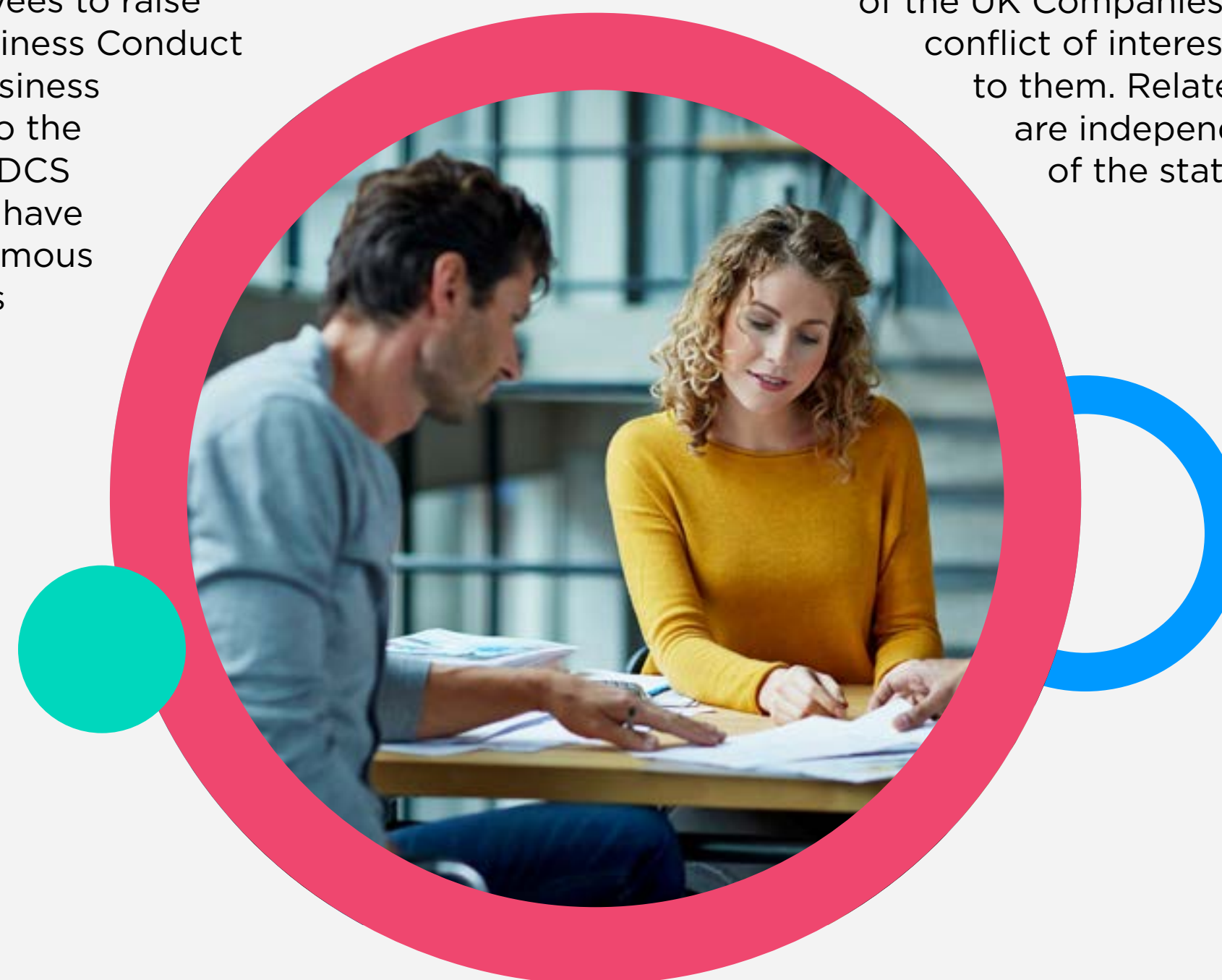
97.2%
of Colt Group employees completed the Code of Business Conduct training
The completion rate for new joiners was 99.4%

Responsible value chain

Colt Group is committed to the highest possible standard of corporate governance and responsibility, including when working with suppliers. These expectations are set forth in our Supplier Code of Conduct, which incorporates the same standards of ethical conduct and integrity as our Code of Business Conduct. Further, in 2024, 90.9% of our supplier spend was with suppliers who had contracts that included clauses on environmental, labour and human rights requirements, accounting for 61.9% of the total number of suppliers. While this slightly decreased from 2023 due to the acquisition of Lumen EMEA (where 93% of spend and 68.6% of suppliers were covered by such contracts), we aim to increase this number through continued efforts to ingrate Lumen EMEA suppliers into Colt Group Procurement.

We actively engage with our suppliers on ESG matters via our VRM system and quarterly business reviews. In 2024, we engaged with 69.0% of our suppliers on a wide range of ESG topics, representing an increase from 3,368 to 4,016 suppliers when compared to 2023.

100% of Colt Group Procurement team members received training on our approach to sustainable procurement in 2024. This included regular refresher trainings, as well as dedicated trainings for suppliers and new team members coming from

Lumen EMEA. All Group Procurement team members also established personal objectives and key results related to ESG.

To understand the current practices of Lumen EMEA suppliers, we sent questionnaires on ESG matters to approximately 400 existing suppliers at the end of 2023. Since November 2023, any new supplier onboarded must comply with the Colt policy and revised due diligence requirements. We continue to drive alignment with the main Lumen EMEA suppliers. In 2025, we will also continue analysing the results of these surveys and consider where engagement priorities may need to be adjusted to ensure that we are making a meaningful impact across our value chain.

Guided by our Sustainable Procurement Policy, we consider sustainability criteria in the selection, management and evaluation of our suppliers. We use Request for Proposal (RFP) scoring to evaluate supplier ESG performance and use our VRM system which covers a wide range of ESG issues, including environment, health and safety, anti-bribery and corruption, data protection, cybersecurity, human rights and modern slavery protection. In the case that the estimated new supplier spend is greater than €50k, suppliers are subject to the full VRM Standard as a condition for approval. Existing suppliers are assessed when their contracts are due for renewal and ESG performance is always included in quarterly business reviews with suppliers.

As discussed in the **Carbon reduction strategy** section, we have made notable strides in our work with our suppliers to reduce our supply chain emissions.

In 2024, we continued to assess our suppliers' approach to DEI and digital accessibility. We engaged with 2,520 suppliers via a survey on DEI matters, where they self-reported on their policies, initiatives, data collection and supplier engagement practices. As digital accessibility is a key aspect of our DEI programme, we also engaged with suppliers to understand how they manage accessibility matters, including conformance with Web Content Accessibility Guidelines (WCAG) 2.1 Level AA and other third-party standards.

Colt and Colt DCS suppliers type*

Colt
- Colocation **11%**
- Facilities **7%**
- Human resources services **4%**
- Marketing **6%**
- Network backbone **5%**
- Network electronics and infrastructure equipment **5%**
- Network infrastructure services **9%**
- Network infrastructure services **9%**
- OLO **14%**
- Professional services **6%**
- Other **33%**

Colt DCS
- Other **4%**
- DCS building maintenance and construction **28%**
- DCS equipment maintenance **9%**
- DCS IT **7%**
- DCS Marketing **3%**
- DCS security **3%**
- DCS services **42%**
- DCS third party DC space **1%**
- Utilities and energy **3%**

*Based on number of suppliers (31st December 2024).

69.0%
of our suppliers have been engaged on ESG topics

5,800+
suppliers from 55 countries in 2024 (Colt Group)

76.4%
of our suppliers have signed our Supplier Code of Business Conduct
(slight decrease from 2023 due to the acquisition of Lumen EMEA)

75.1%
of Colt Group's suppliers reported having a DEI Policy

Risk management

Colt Group applies an Enterprise Risk Management (ERM) Framework to evaluate risks to our business. Environmental and social considerations are included in this process. ISO 31000 standards guide our risk management approach, following a four-stage continuous process: identifying risks, assessing risks, implementing appropriate measures and ongoing monitoring.

To improve risk oversight across Colt Group, in 2024 we introduced a dedicated Risk Policy & Procedure and a Risk Function for Colt DCS and merged the reporting and governance structures of Colt and Lumen EMEA's ERM processes.

Colt's ERM framework identifies and assesses sustainability risk using our Climate Change Risk Register, country-specific or function-specific risk registers and the ESG risk register. Additionally, under certain circumstances, project risk registers may include some ESG-related risks. In 2024, Colt DCS also developed bottom-up risk registers across support functions and operations.

At group level, we updated the climate risk register and quantitative climate scenario analysis to include all Lumen EMEA assets and locations. We also used publicly available data from Network for Greening the Financial System (NGFS). Our latest quantitative scenario analysis focused on temperature rise, flooding and carbon pricing. In 2024, we continued reporting according to the mandatory climate-related financial disclosure as part of the Colt Group annual report and consolidated financial statements.

As a Group, we undertook the following targeted risk reviews in 2024:

Economic Crime & Corporate Transparency Act (ECCTA)
The UK's ECCTA was introduced in 2023. Colt Group assessed potential fraud-related risks and began implementing measures related to ECCTA's Failure to Prevent Fraud provisions. This included targeted training, policy updates (including a fraud-specific policy), a risk review mechanism and application of lessons learnt to existing practices.

Anti-Bribery and Corruption
Colt Group periodically benchmarks itself against the principles of the UK Bribery Act, considered one of the most stringent anti-corruption regulatory regimes in the world. In 2024, we refreshed our Anti-Bribery and Corruption risk assessment and provided Code of Conduct training to the Lumen EMEA workforce. In 2025, we will issue updated Anti-Bribery and Corruption training to all Colt Group employees with targeted training for at-risk roles.

Double Materiality Assessment
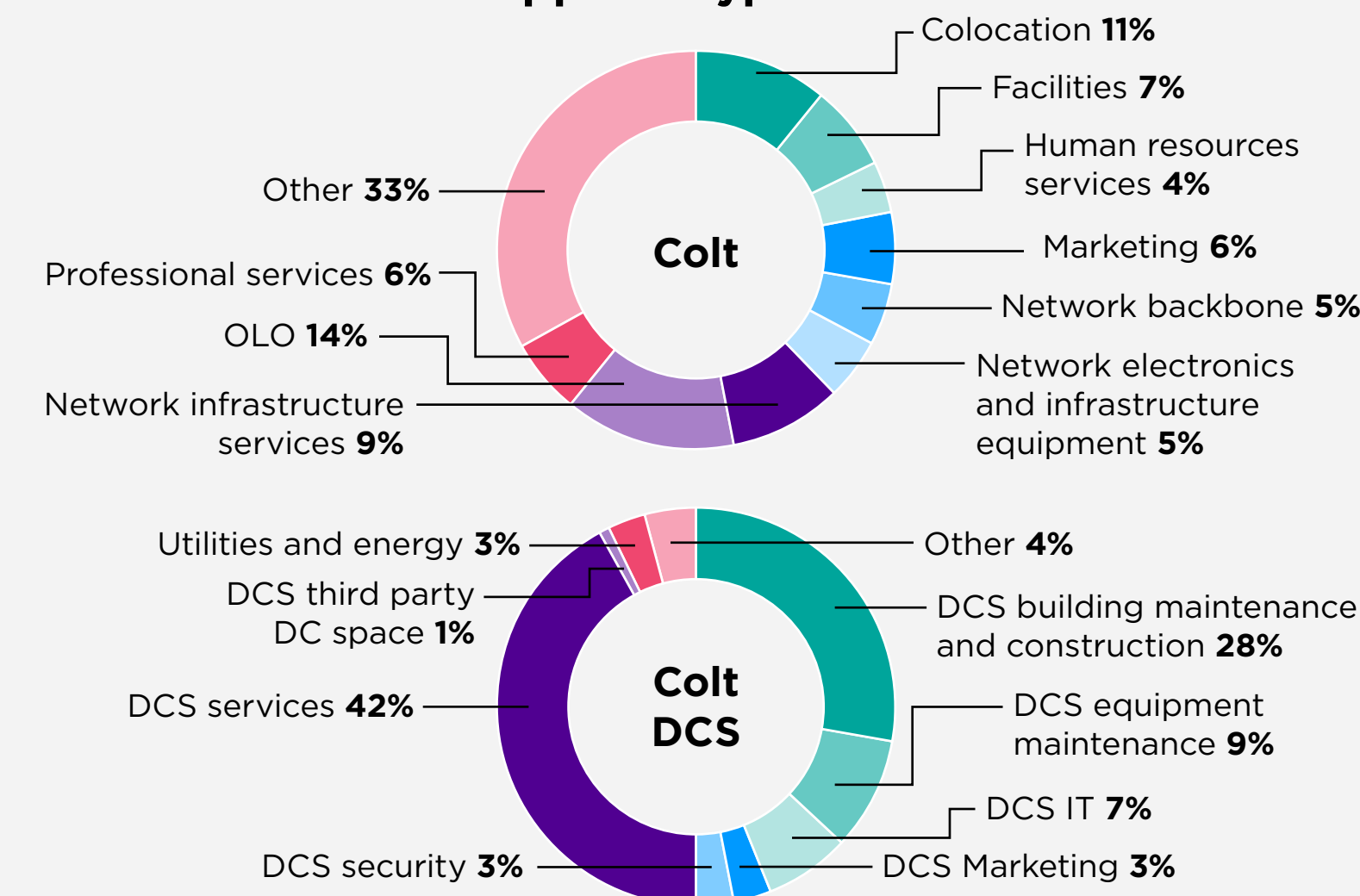As discussed further in **Colt Group ESG strategy**, we conducted a DMA in preparation for our compliance with the upcoming European Union's ESG reporting regulations. This included an assessment of material ESG risks from an impact (inside-out) and financial (outside-in) perspective.

Subsea Risk Deep Dive
Through our acquisition of Lumen EMEA, we gained subsea capabilities. Accordingly, we assessed the risks related to landing zone equipment decommissioning, as well as the undersea and marine damage that could be caused to ecosystems and biodiversity. Given that repairs occur infrequently, and as Colt does not have plans to construct future trenches, the potential for impacts from installation and repair of subsea infrastructure and subsea pollution was not considered material under the 2024 Colt DMA. We also analysed the opportunities related to the optimisation and redesign of existing assets and how this could result in a reduction of power consumption and, therefore, energy costs and carbon emissions.

AI Governance Framework
Our AI SteerCo has oversight over the processes that govern the adoption of AI for Colt Group. We have also established a preliminary framework for the assessment of risks associated with the use of AI in new tools, including an evaluation of algorithms which may discriminate against certain groups or give biased information. These were foundational steps to the development of our AI policy in 2025.

In 2025, our key priorities will be continuing to ensure climate risks are considered as part of financial and strategic planning and to meet the upcoming EU's ESG reporting regulations, including assessment and management of material risks stemming from the 2024 DMA.

Data privacy and cybersecurity

At Colt, security is embedded across every part of our business. The protection of our systems, data, people and customers is critical to our operations. Colt's **Data Privacy Statement** sets out how we manage privacy and protect personal and corporate data. We use the principles of Privacy by Design and Privacy by Default as the basis of decision-making for every product, application, policy and system. Our approach includes certifications such as ISO 27001, ISO 22301 and Cyber Essentials Plus, reflecting our commitment to robust cybersecurity standards. Our cybersecurity programs and risks are regularly reviewed by Management, covering our people, processes, applications, IT infrastructure and network.

We continuously monitor the implementation of directives, regional acts or local regulatory requirements where we operate and are committed to adapting our practices to meet new requirements and local state legislation, along with regulatory reporting of security incidents. This proactive approach ensures we remain at the forefront of cybersecurity compliance and can swiftly implement necessary changes to protect Colt and customer data. We updated our rules for data protection and data transfer as defined in Colt's BCR. The update was approved by the EDPB in 2024. We are continuing the process of mapping BCR data for Lumen EMEA and we are on track to complete this process in 2025.

Colt made significant progress in the exchange of documentation with the Information Commissioner's Office (ICO) throughout the year, paving the way for the approval of UK BCRs. This advancement marks a crucial step in Colt's commitment to data protection and compliance, with the final approval expected in 2025.

In 2024, Colt became one of the only digital infrastructure companies to be awarded the ISO 27701 certification on a country-by-country basis. ISO 27701 is a privacy extension to ISO 27001 and provides a comprehensive framework for managing PII. By implementing ISO 27701, we have established a robust PIMS that enhances our ability to comply with various data privacy regulations.

Colt DCS provides critical infrastructure and whitespace to customers and does not manage customer information held within customer owned assets within the data centre. All Colt DCS operational data centres hold ISO 27001:2022 and SOC2 Type II certification.

We have implemented a data breach complaints procedure for employees, customers and third parties. Annual training in Data Breach and Data Privacy compliance and Information Security Awareness is provided to all Colt Group employees.

ISO 27701 recognises the maturity of our privacy and security framework and demonstrates that Colt is complying with the strictest security protocol available

99.3%
of Colt Group Employees completed Data Privacy training
The completion rate for new joiners was 100%

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Protecting against cyber risks

In order to strengthen our protection against cyber risks, we underwent a voluntary third-party Cyber Maturity Assessment in 2024. Led by Deloitte, the assessment reviewed how controls to manage cyber security are designed and implemented at Colt. We are working to address observations and recommendations contained within the assessment.

We are particularly proud of our data privacy maturity, which received a 4.5/5. This reflects the mature understanding and implementation of country privacy requirements, as well as practices around the collection, storage, use, sharing and transfer of personal information.

In order to uphold our Privacy by Design principle and be transparent with our customers, we have developed **Privacy Statements** for Colt Products that describe the details of data processing activities for thirteen of Colt's services.

Human rights

As a Group, we are committed to running our business responsibly, striving to maintain the highest ethical principles and to respect human rights.

We have zero tolerance for slavery and human trafficking and will not tolerate such activities within our operations or supply chain. We take appropriate steps to ensure that everyone who works for Colt benefits from a working environment where fundamental rights and freedoms are upheld.

Our basis for this is the International Labour Organisation's (ILO's) five fundamental principles:

01 Freedom of association and the right to collective bargaining

02 Elimination of all forms of forced or compulsory labour

03 Abolition of child labour

04 No discrimination

05 Safe and healthy working environment

For more details, please see our **Modern Slavery Act Statement**, which is reviewed annually by our Board.

In the European Union, 58.6% of our employees are covered by collective bargaining agreements, which outline working conditions and terms of employment. For employees not covered by these agreements, working conditions and terms of employment are specified in their employment contracts, as well as in our global and local HR policies and the employee handbook.

We maintain active communication with our employees through the European Works Council (EWC) and National Works Councils (NWCs). In countries without a NWC or union representation, we offer alternative forums for information and consultation, such as elected employee representatives and Colt Ambassadors.

Our Social Dialogue Statement establishes a global framework for social dialogue that aligns with Colt's values, diversity, equity and inclusion goals, our people agenda and global ESG strategy, all supported by local legislation across our jurisdictions. This Statement underscores Colt's commitment to fostering consensus and democratic involvement among key stakeholders, including the EWC, NWCs and employee representatives, to protect labour rights. It also reaffirms our dedication to upholding the fundamental human rights outlined by the ILO.
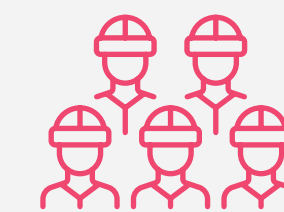
58.6%
of Colt Group employees in the European Union are covered by Collective Bargaining Agreements*

*As of December 31, 2024. This percentage includes employees, fixed-term employees, apprentices, trainees and graduates with active payroll at Colt Group. This percentage is lower compared to the figure reported in 2023. However, it now includes employees joining from Lumen EMEA and, for comparative purposes, there is an increase from 56.7% in 2023 when considering Lumen EMEA.

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Appendix

Colt Group's commitment to the UN SDGs

Colt is committed to supporting the UN Sustainable Development Goals (SDGs) by integrating sustainability into business operations, promoting responsible business practices, and partnering with stakeholders to drive progress towards the SDGs.

SDG	Examples of activities	Where to read more
3 GOOD HEALTH AND WELL-BEING	We prioritise the wellbeing of our employees. We have continued our wellbeing and mental health policies. We have also initiated new campaigns, for example on menopause, mental health training for managers and financial wellbeing.	**Supporting our workforce**
4 QUALITY EDUCATION	Ensuring that our employees have the skills for our current and future needs remains paramount. We have updated our learning and development programmes, financed requests for external training and continued to hire new young talent into our graduate programme.	**Supporting our workforce**
5 GENDER EQUALITY	Gender equality is important to us and our Women+ employee network plays a key role in our efforts to ensure gender equality at Colt. The network volunteers also helped us develop a training programme around personal development for women at Colt.	**Supporting our workforce** **Responsible business practices**
7 AFFORDABLE AND CLEAN ENERGY	We are committed to improving our energy efficiency and reducing our emissions. We strive to continuously improve our infrastructure to implement more energy-efficient technologies for both our own activities and our customer offering. We increased our solar energy production capacity at our data centres.	**Our commitment to the environment**
8 DECENT WORK AND ECONOMIC GROWTH	We are dedicated to advancing decent work and economic growth by collaborating with partners to create sustainable solutions that promote economic growth, create jobs and promote innovation. We have focused on accessibility to create an inclusive and accessible workplace for all.	**Pioneering sustainable services** **Responsible business practices**
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	We teamed up with external partners to create Proof of Concepts for smart buildings and offices that reduce their environmental footprint. We prioritised increasing the circularity of our network infrastructure through investment recovery partnerships.	**Pioneering sustainable services**
10 REDUCED INEQUALITIES	We engaged with local charities to help address social and economic inequalities. We ensure ethical governance by applying robust anti-corruption and anti-bribery policies, implementing effective risk management systems, and promoting transparency and accountability in our operations.	**Responsible business practices**
12 RESPONSIBLE CONSUMPTION AND PRODUCTION	We actively work towards reducing waste generation. Some of our data centre sites have become certified zero-waste facilities where we are diverting 90% of waste away from landfill.	**Our commitment to the environment**
13 CLIMATE ACTION	We are focused on reducing the impact our activities have on climate change. We invest in renewable energy solutions, set ambitious emission reduction targets and engage with our suppliers to reduce the environmental impacts in the supply chain.	**Our commitment to the environment**
16 PEACE, JUSTICE AND STRONG INSTITUTIONS	We are implementing comprehensive supply chain engagement initiatives to ensure transparency by mapping our suppliers and monitoring their compliance with labour and environmental standards. We ensure respect for human rights in our supply chain and in our own activities.	**Pioneering sustainable services** **Responsible business practices**
17 PARTNERSHIPS FOR THE GOALS	We partner with other companies to achieve industry best practice, share knowledge and develop resources to achieve the SDGs collectively.	**Pioneering sustainable services** **Supporting our workforce**

External Assurance Statement by BSI

The sustainability activities reported by Colt Technology Services Group Limited have been independently verified by BSI over the course of a 11-day audit to a Limited Level of Assurance.

The scope of this audit has been a verification of environmental statements and social and governance claims made in the 2024 Annual Sustainability Report (for the reporting period 01/01/2024 to 31/12/24), which included data and claims in the GRI Table and data table appendixes. These elements were measured against GRI reporting guidelines. BSI verified data, calculations and claims.

Additionally, to being verified against the GRI Standard, for the social and governance claims; qualitative analysis was carried out against prevailing social and governance best practice and to verify quantitative elements, including worker statistics and claims, raw company data was requested and cross examined.

The verification of environmental statements (in relation to Scope 1, 2 and 3 GHG emissions; (a) waste quantities – total waste, waste to energy, waste to landfill, waste recycled, hazardous and non-hazardous), (b) Procurement – supplier policies, recycling and repurposing of equipment, sustainable procurement, (c) Biodiversity – related biodiversity assessments, (d) Water – utilities supply and treatment, reduction opportunities, (e) Energy – energy usage, renewable energy guarantee of origin (REGO) certificates, reductions and fleet electrification has been carried out in line with the principals and guidance set out in ISO14016:2020, to a limited level of assurance and a materiality level of 10%.

NOTE: BSI Assurance UK Ltd is independent to and has no financial interest in Colt Technology Services Group Limited. This verification opinion has been prepared for Colt Technology Services Group Limited only for the purposes of verifying its environmental and social data described in the scope above. It was not prepared for any other purpose. In making this Statement, BSI Assurance UK Ltd has assumed that all information provided to it by Colt Technology Services Group Limited is true, accurate and complete. BSI Assurance UK Ltd accepts no liability to any third party who places reliance on this Opinion Statement.

Colt Group certifications and management systems

ISO 9001 International Quality Management System (Expiry date: October 2025)	ISO 22301 Business Continuity Management (Expiry date: July 2025)
ISO/IEC 20000-1 IT Service Management (Expiry date: Sep 2025)	Cyber Essential Plus (Expiry date: August 2025)
ISO 27001 Information Security Management (Expiry date: April 2025)	Binding Corporate Rules (BCRs)
ISO 27701 Privacy Information Management System (PIMS) (Expiry date: February 2027)	ISO 50001 (Expiry date: March 2027)
ISO 14001 Environmental Management (Expiry date: January 2028)	Certificate of Compliance with the National Security Scheme (ENS) (Expiry date: December 2025)

Greenhouse gasses calculation methodology

Colt Group calculates its organisational emissions in accordance with the GHG Protocol Corporate Accounting and Reporting Standard and its principles.

Standard and supporting standards:

- **Scope 1 emissions** – WRI/WBCSD: GHG Protocol: A Corporate Accounting and Reporting Standard, Revised Edition (the GHG Protocol)

- **Scope 2 emissions** – WRI: GHG Protocol Scope 2 Guidance: An Amendment to the GHG Protocol Corporate Standard

- **Scope 3 emissions** – WRI: GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard

Colt Group consolidates its organisational boundary according to the operational control approach, which includes all assets that have an environmental impact over which the group has operational control. This means having full authority to introduce and implement operating policies. In 2024, we updated the periodicity to calculate Colt Group GHG emissions by establishing a half-year emissions reporting programme.

Colt Group GHG emissions cover the following categories:

- **Scope 1:** Natural gas, fuel from own fleet, refrigerants, generation of renewable energy (solar PV) and other fuel (from generator use) consumption

- **Scope 2:** Electricity consumption at Colt Group-owned and operated sites, including heat & steam and operation of EVs

- **Scope 3:** Purchased goods and services, capital goods, fuel- and energy-related activities (FERA), upstream transportation and distribution, waste generated in operations, business travel, employee commuting, upstream leased assets and downstream leased assets (DLA)

GHG emissions include all Colt Group countries except for:

- Emissions for 2019 do not include data on the United States, South Korea and Poland

Emission factors used:

- BEIS (DEFRA) 2024, 2023, 2022 and 2019 for Scope 1 across Colt Group, Scope 2 in the UK, and the following Scope 3 categories – FERA, waste, business travel and employee commuting

- IEA 2024, 2023, 2022 and 2019 for Scope 2 electricity in Europe, Asia and United States, Scope 3 categories (homeworking, DLA, upstream leased assets and FERA)

- Transition from EORA emission factors to the Carbon Trust EEIO emission factors for Scope 3 purchased goods and services and capital goods spend-based GHG emission calculations in 2024, 2023, 2022 and 2019

- The Carbon Trust EEIO emission factors were also used for the GHG calculation of Scope 3 upstream transportation and distribution category

We are continually working towards best practices, collecting actual data (even if it is from previous years) and updating methodologies. In accordance with the GHG Protocol and Colt Group's rebaseline policy (defining significant change as +/- 5% of total emissions), Colt Group recalculated its 2019 GHG emissions base year to reflect the expanded operational footprint, following the acquisition of Lumen EMEA in November 2023. Additionally, Lumen EMEA emissions have been fully incorporated using back-casting (2019–2022) and direct metering (2023, 2024).

Restatements on Colt Group GHG emissions reported in 2023:

- Categories 1 and 2 of Scope 3 for Colt (2019, 2022 and 2023) were restated due to an update on spend-based emission factors. We have moved from EORA to EEIO provided by the Carbon Trust

- Information relating to Colt DCS for 2019, 2021, 2022 and 2023 has been restated to reflect portfolio operational changes completed during 2024. Colt sites underwent a reclassification, and several Colt DCS sites are no longer considered under Colt Group's operational control which resulted in a restatement of the historical Scope 1, 2 and 3 emissions data pertaining to the DCS sites associated to this business activity. This adjustment was made to ensure compliance with the GHG Protocol under the Operational Control approach

Data tables

Note: This report covers Colt Group 2024 data, including Lumen EMEA. Given the timing of the acquisition, data from 2022 and 2023 do not include Lumen EMEA unless otherwise noted.

Pioneering sustainable services

Customer Net Promoter Score (NPS)			
	2022	**2023**	**2024**
DCS Global	72	74	75
DCS Asia	69	71	68
DCS Europe and United Kingdom	76	79	84
One Colt*	N/A; metric developed in 2024		58
Colt EU	63	76	68
Colt Asia	51	77	62

*One Colt includes customers from Colt Europe and Asia, as well as Lumen EMEA customers.

Our commitment to the environment

Colt Group GHG emissions in metric tonnes CO$_2$e (including Lumen EMEA)*						
Category	2019 (baseline)	2022	2023	2024	Variation against 2019 (baseline)	Variation against 2023
Gross direct (Scope 1) GHG emissions	6,773	3,950	4,395	3,881	-43%	-12%
Gross market-based indirect (Scope 2) GHG emissions	43,841	16,648	11,893	6,941	-84%	-42%
Gross indirect (Scope 3) emissions**	495,494	311,643	374,463	341,814	-31%	-9%
Gross direct and indirect market-based (Scope 1 and 2) GHG emissions	50,614	20,598	16,287	10,822	-79%	-34%
Total emissions*	**546,108**	**332,241**	**390,750**	**352,635**	**-35%**	**-10%**

*We performed a comprehensive rebaselining exercise to accurately account for our expanded operational footprint following the acquisition of Lumen EMEA. As such, data for the 2019-2024 period includes Lumen EMEA. See Greenhouse gasses calculation methodology for details.
**Scope 3 and total emissions reported in this table, customer and supplier specific market-based Scope 2 data were used where available for electricity related emissions; residual-mix emission factor was applied where not.
***Restatements - Categories 1 and 2 of Scope 3 for Colt (2019, 2022 and 2023) were restated due to an update on spend-based emission factors. We have moved from an EEIO source provided by EORA to one provided by the Carbon Trust. With regards to Scope 1, 2 and Scope 3 categories 1, 3, 5 for Colt DCS (2019-2023), the reclassification of some Colt DCS sites not considered under Colt Group's operational control has resulted in a restatement of the historical emissions data associated to this business activity. This adjustment was made to ensure compliance with the GHG Protocol under the Operational Control approach.

Environmental management			
	2022	**2023**	**2024**
Percentage of operational sites assessed on specific environmental risks	71.4%	93.0%	93.0%

Energy consumption*			
	2022	**2023**	**2024**
Non-renewable sources			
Natural gas (MWh)	1,831	2,327	3,186.03
Other fuels	453,486	529,237	511,580.3
Electricity consumption (MWh)			
Total electricity (including heating & cooling)	409,897.9	282,931.7	275,773.7
Total electricity (excluding heating & cooling)	409,298.9	280,692.4	275,117.1
Renewable electricity	338,117.3	220,244.7	257,655.5
Renewable sources			
Renewable electricity (% share of total excluding heating & cooling)	83%	78%	94%

*Data for 2022 to 2024 include Lumen EMEA where available and estimated where it was not.

Colt Group owned vehicle fleet*			
	2022	**2023**	**2024**
Number of Battery Electric Vehicles (BEVs)	NA	101	135
Percent Battery Electric Vehicles (BEVs)	17%	30%	30%
Number of Plug-in Hybrid Electric Vehicles (PHEVs)	71	128	185
Percent Plug-in Hybrid Electric Vehicles (PHEVs)	20%	38%	42%
Total vehicles**	**355**	**336**	**445**

*2022, 2023 figures do not include Lumen EMEA vehicle fleet data.
**Total vehicle fleet owned by Colt Group.

Waste*			
	2022	**2023**	**2024**
Waste generation (tonnes)			
Non-hazardous waste generated	42	153	777
Hazardous waste generated	300	403	430
Total waste generated	341	556	1,207
Hazardous waste by disposal type (tonnes)*			
Recycled	NA	152	430
Landfill***	NA	0	0
Waste to energy	NA	0	0
Non-hazardous waste by disposal type (tonnes)			
Recycled	NA	197	355
Landfill	NA	114	95
Waste to energy	NA	92	327
Total waste by disposal type (tonnes)			
Recycled	180	349	785
Landfill	21	114	95
Waste to energy	139	92	327

*Figures rounded to the nearest tonne. 2023 and 2023 data do not include Lumen EMEA.
**For 2022 waste data the breakdown by disposal type of Hazardous and Non-Hazardous waste was not available, therefore not reported.
***100% of hazardous waste was sent to a recycling facility to be recycled. There is a low percentage of the hazardous waste that cannot be recycled; this is safely managed by the recycling facility.

Equipment reuse*			
	2022	**2023**	**2024**
Number of Colt quality second hand equipment units	8,132	6,183	5,493
Number of Colt extended life equipment units via reuse	40,755	42,670	48,944

*2022 and 2023 data do not include Lumen EMEA.

Supporting our workforce

- Employees in this report refers to the following definition: the number of people employed by Colt, who are on Colt Payroll, including the following person types: Employee, Apprentice - Europe only, Graduate Rotational, Contract Trainee, Fixed Term Employee, Trainee, Student; excluding all contractors, apprentices in India and interns. This excludes Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy, as well as apprentices in India and interns. Inactive workers, i.e., those on long term leave but still directly or indirectly employed by Colt Group in line with our employee definition, are also included.

- Headcount as of December 31, 2024.

- 2023 and 2024 data in this section include employees joining from Lumen EMEA.

- Rest of Colt Group includes: Austria, Belgium, Bulgaria, China, Denmark, Greece, Hong Kong, Ireland, Italy, Luxembourg, Netherlands, Poland, Portugal, Romania, Singapore, Sweden, Switzerland, South Korea, Turkey and the United States.

Employee breakdown by gender and region				
		2022	**2023**	**2024**
France	Female	88	99	99
	Male	199	223	225
Germany	Female	109	120	113
	Male	336	398	377
India	Female	467	475	516
	Male	1,443	1,441	1,447
Japan	Female	79	87	80
	Male	255	253	256
Spain	Female	234	246	247
	Male	358	363	353
United Kingdom	Female	245	510	468
	Male	598	1,218	1,051
Rest of Colt	Female	430	577	553
	Male	579	716	683
Total number		**5,420**	**6,726**	**6,468**

Total number of full-time and part-time employees, and a breakdown by gender and by region													
		2022				2023				2024			
		Female	Male	% Female	Total	Female	Male	% Female	Total	Female	Male	% Female	Total
France	Full-time	85	199	29.9	284	94	222	29.7	316	93	224	29.3	317
	Part-time	3	0	100.0	3	5	1	83.3	6	6	1	85.7	7
	Total	88	199	30.7	287	99	223	30.7	322	99	225	30.6	324
Germany	Full-time	63	322	16.4	385	66	382	14.7	448	62	359	14.7	421
	Part-time	46	14	76.7	60	54	16	77.1	70	51	18	73.9	69
	Total	109	336	24.5	445	120	398	23.2	518	113	377	23.1	490
India	Full-time	467	1,443	24.5	1,910	475	1,441	24.8	1,916	516	1,447	26.3	1,963
	Part-time	0	0	-	0	0	0	-	0	0	0	-	0
	Total	467	1,443	24.5	1,910	475	1,441	24.8	1,916	516	1,447	26.3	1,963
Japan	Full-time	79	255	23.7	334	87	253	25.6	340	80	256	23.8	336
	Part-time	0	0	-	0	0	0	-	0	0	0	-	0
	Total	79	255	23.7	334	87	253	25.6	340	80	256	23.8	336
Spain	Full-time	204	355	36.5	559	217	360	37.6	577	224	351	39.0	575
	Part-time	30	3	90.9	33	29	3	90.6	32	23	2	92.0	25
	Total	234	358	39.5	592	246	363	40.4	609	247	353	41.2	600
United Kingdom	Full-time	225	592	28	817	453	1,211	27	1,664	421	1,046	28.7	1,467
	Part-time	20	6	77	26	57	7	89	64	47	5	90.4	52
	Total	245	598	29.1	843	510	1,218	30	1,728	468	1,051	30.8	1,519
Rest of Colt	Full-time	411	564	42	975	552	700	44	1,252	528	667	44.2	1,195
	Part-time	19	15	56	34	25	16	61	41	25	16	61.0	41
	Total	430	579	42.2	1,009	577	716	45	1,293	553	683	44.7	1,236
Total	**Full-time**	**1,534**	**3,730**	**29.1**	**5,264**	**1,944**	**4,569**	**29.8**	**6,513**	**1,924**	**4,350**	**30.7**	**6,274**
	Part-time	**118**	**38**	**75.6**	**156**	**170**	**43**	**79.8**	**213**	**152**	**42**	**78.4**	**194**
	Total	**1,652**	**3,768**	**30.5**	**5,420**	**2,114**	**4,612**	**31.4**	**6,726**	**2,076**	**4,392**	**32.1**	**6,468**

Total number of permanent and temporary employees, and a breakdown by gender and by region													
		2022				**2023**				**2024**			
		Female	Male	% Female	Total	Female	Male	% Female	Total	Female	Male	% Female	Total
France	Permanent	84	198	29.8	282	95	221	35.4%	316	98	225	30.3%	323
	Temporary	4	1	80.0	5	4	2	57.1%	6	1	0	100.0%	1
	Total	88	199	30.7	287	99	223	36.0%	322	99	225	30.6%	324
Germany	Permanent	101	322	23.9	423	116	384	27.4%	500	110	367	23.1%	477
	Temporary	8	14	36.4	22	4	14	22.2%	18	3	10	23.1%	13
	Total	109	336	24.5	445	120	398	27.2%	518	113	377	23.1%	490
India	Permanent	459	1,424	24.4	1,883	474	1,439	24.8%	1,913	510	1,439	26.2%	1,949
	Temporary	8	19	29.6	27	1	2	5.6%	3	6	8	42.9%	14
	Total	467	1,443	24.5	1,910	475	1,441	24.6%	1,916	516	1,447	26.3%	1,963
Japan	Permanent	75	251	23.0	326	83	250	24.9%	333	78	251	23.7%	329
	Temporary	4	4	50.0	8	4	3	16.7%	7	2	5	28.6%	7
	Total	79	255	23.7	334	87	253	24.4%	340	80	256	23.8%	336
Spain	Permanent	224	354	38.8	578	244	362	42.2%	606	246	351	41.2%	597
	Temporary	10	4	71.4	14	2	1	66.7%	3	1	2	33.3%	3
	Total	234	358	39.5	592	246	363	42.3%	609	247	353	41.2%	600
United Kingdom	Permanent	235	583	28.7	818	489	1,208	62.9%	1,697	455	1,039	30.5%	1,494
	Temporary	10	15	40.0	25	21	10	63.6%	31	13	12	52.0%	25
	Total	245	598	29.1	843	510	1,218	63.0%	1,728	468	1,051	30.8%	1,519
Rest of Colt	Permanent	320	538	37.3	858	467	677	55.4%	1,144	486	660	42.4%	1,146
	Temporary	110	41	72.8	151	110	39	71.0%	149	67	23	74.4%	90
	Total	430	579	42.6	1,009	577	716	57.8%	1,293	553	683	44.7%	1,236
Total	**Permanent**	**1,498**	**3,670**	**29.0**	**5,168**	**1,968**	**4,541**	**38.3%**	**6,509**	**1,983**	**4,332**	**31.4%**	**6,315**
	Temporary	**154**	**98**	**61.1**	**252**	**146**	**71**	**56.6%**	**217**	**93**	**60**	**60.8%**	**153**
	Total	**1,652**	**3,768**	**30.5**	**5,420**	**2,114**	**4,612**	**39.2%**	**6,726**	**2,076**	**4,392**	**32.1%**	**6,468**

Total number and rate of new employee hires and turnover during the reporting period, by gender and region*										
		2022			**2023**			**2024**		
		Female	**Male**	**Total**	**Female**	**Male**	**Total**	**Female**	**Male**	**Total**
France	Total new hires	19	15	34	25	36	61	8	11	19
	New hire rate	21.6	7.5	11.8	25.3	16.1	18.9	8.1	4.9	5.9
	Turnover	10	7	17	12	14	26	10	9	19
	Turnover rate	11.6	3.6	6.0	13.8	7.0	9.0	10.2	4.1	5.9
Germany	Total new hires	5	19	24	19	80	99	1	11	12
	New hire rate	4.6	5.7	5.4	15.8	20.1	19.1	0.9	2.9	2.4
	Turnover	5	14	19	7	18	25	7	33	40
	Turnover rate	4.6	4.2	4.3	6.4	5.2	5.5	6.1	8.5	7.9
India	Total new hires	115	321	436	54	110	164	75	88	163
	New hire rate	24.6	22.2	22.8	11.4	7.6	8.6	14.5	6.1	8.3
	Turnover	101	240	341	46	108	154	34	81	115
	Turnover rate	22.0	17.2	18.4	9.6	7.4	8.0	7.0	5.6	6.0
Japan	Total new hires	21	41	62	16	32	48	8	30	38
	New hire rate	26.6	16.1	21.6	18.4	12.6	14.1	10.0	11.7	11.3
	Turnover	14	30	44	8	33	41	15	29	44
	Turnover rate	18.4	12.0	13.5	9.3	12.7	11.9	18.1	11.1	12.8
Spain	Total new hires	28	31	59	24	25	49	9	11	20
	New hire rate	12.0	8.7	17.7	9.8	6.9	8.0	3.6	3.1	3.3
	Turnover	18	26	44	12	20	32	8	20	28
	Turnover rate	7.8	7.3	7.5	5.1	5.7	5.4	3.6	5.5	4.6
United Kingdom	Total new hires	76	73	149	303	708	1,011	47	62	109
	New hire rate	31.0	12.2	7.8	59.4	58.1	59	10.0	5.9	7.2
	Turnover	65	73	138	35	88	123	87	218	305
	Turnover rate	26.6	12.3	16.5	11.5	12.8	12.4	17.3	18.7	18.3
Rest of Colt	Total new hires	81	50	131	190	176	366	37	16	53
	New hire rate	19	9	13	33	25	28	6.7	2.3	4.3
	Turnover	57	56	113	43	41	84	59	50	109
	Turnover rate	14	10	11	9	7	8	10.4	7.1	8.6
Total	**Total new hires**	**345**	**550**	**895**	**631**	**1,167**	**1,167**	**185**	**229**	**414**
	New hire rate	**20.9**	**14.6**	**16.5**	**29.8**	**25.3**	**26.7**	**8.9**	**5.2**	**6.4**
	Turnover	**270**	**446**	**716**	**163**	**322**	**485**	**220**	**440**	**660**
	Turnover rate	**16.6**	**12.0**	**13.4**	**9.2**	**8.3**	**8.6**	**10.5**	**9.7**	**9.9**

*According to Data Protection Regulation, only the above figures can be disclosed. New hire rate: (total new hires in year/total employees at end of the year) x100. Turnover rate: (total leavers in year/average no. employees at end of the year) x100.

Total number and rate of new employee hires and turnover during the reporting period, by gender and age group*

		2022			2023			2024		
		Female	**Male**	**Total**	**Female**	**Male**	**Total**	**Female**	**Male**	**Total**
Gen Z (born after 1994)	Total new hires	81	93	174	100	134	234	68	53	121
	New hire rate	55.9	57.8	56.9	44.8	52.3	48.9	27.2	20.4	23.7
	Turnover	47	23	70	23	35	58	40	49	89
	Turnover rate	36.4	18.3	27.5	13.8	18.5	16.3	17.2	18.9	18.1
Gen Y (born between 1980-1994)	Total new hires	195	355	550	301	390	691	89	122	211
	New hire rate	20.7	19.6	20.0	26.4	19.1	21.7	8.0	6.2	6.8
	Turnover	168	297	465	99	167	266	111	175	286
	Turnover rate	18.1	16.8	17.2	9.9	9.0	9.3	9.8	8.6	9.1
Gen X (born between 1965 – 1979)	Total new hires	56.0	81.0	137.0	202	518	720	23	52	75
	New hire rate	10.7	5.3	6.7	29.5	26.4	27.2	3.5	2.8	3.0
	Turnover	51	98	149	34	90	124	56	155	211
	Turnover rate	9.7	6.3	7.2	6.1	5.7	5.8	8.3	8.1	8.1
Baby Boomers (born before 1965)	Total new hires	13	21	34	28	125	153	5	2	7
	New hire rate	28.9	8.1	11.1	43.1	35.4	36.6	8.8	0.7	2.0
	Turnover	4	28	32	7	30	37	13	61	74
	Turnover rate	9.5	10.7	10.5	14.6	11.3	11.8	21.3	18.5	19.0
Total	**Total new hires**	**345**	**550**	**895**	**631**	**1,167**	**1,798**	**185**	**229**	**414**
	New hire rate	**20.9**	**14.6**	**16.5**	**29.8**	**26.6**	**26.7**	**8.9**	**5.2**	**6.4**
	Turnover	**270**	**446**	**716**	**163**	**322**	**485**	**220**	**440**	**660**
	Turnover rate	**16.6**	**12.0**	**13.4**	**9.2**	**8.3**	**8.6**	**10.5**	**9.7**	**9.9**

*According to Data Protection Regulation, only the above figures can be disclosed. New hire rate: (total new hires in year/total employees at end of the year) x100. Turnover rate: (total leavers in year/average no. employees at end of the year) x100.

Employee training						
	2022		**2023**		**2024**	
	Colt Group employees	Colt Group employees - new joiners	Colt Group employees	Colt Group employees - new joiners	Colt Group employees	Colt Group employees - new joiners
Business Continuity	98.2%	89.5%	99.3%	95.7%	99.5%	99.4%
Conscious inclusion at Colt	98.5%	91.6%	99.5%	98.2%	99.3%	100.0%
Prevention of Sexual Harassment in Workplace (PoSh)*	98.4%	90.7%	99.8%	97.7%	99.5%	98.0%
Security Awareness at Colt	97.7%	90.9%	98.7%	98.2%	99.0%	98.8%
Code of Conduct	97.7%	89.4%	99.3%	97.5%	97.2%	99.4%
Data Protection	98.3%	87.4%	99.4%	99.0%	99.3%	100.0%
Brand and Vision training**	97.0%	84.0%	-	97.5%	99.5%	99.2%
Health And Safety**	NA	88.3%	-	97.2%	94.1%	97.3%
Action on Environmental Sustainability***	-	-	99.7%	98.0%	99.7%	99.7%

*Colt employees joining from Lumen EMEA did not participate in this training in 2024.
**Training not provided to Colt DCS employees.
***Training course available from 2023.

Early career programme*	2022	2023	2024
Total number of early career program hires	34	33	37

*We will work on improving reporting of our Early Careers feedback in the next year to provide better insights.

Performance review	2022	2023	2024
Percentage of employees who receive regular performance and career development reviews	99%	99%	99%

Safety performance		2022	2023	2024
Injuries	Number of recordable work-related injuries	3	3	7
	Rate of recordable work-related injuries (x 1,000,000)	0.3297	0.3251	0.1193
Fatalities	Number of fatalities as a result of work-related injury	0	0	0
	Rate of fatalities as a result of work-related injury (x 1,000,000)	0	0	0
Total hours worked		**9,097,815**	**9,226,602**	**11,735,579**

Driving social impact

Volunteering and donations			
	2022	**2023**	**2024**
Days volunteered	699	867	1,033.50
Amount donated to charities*	€427,000	€264,218	€564,940

*According to India's 'Companies Act, 2013', it is mandatory for all companies to contribute 2% of its profit towards CSR activities. Figure includes this amount.

Responsible business practices

Board composition						
	2022		**2023**		**2024**	
	Total	Women	Total	Women	Total	Women
Total number on Board	7	3	4	3	8	5
Number of which executive	1	1	1	1	2	2
Number of which non-executive	6	2	3	2	6	3

Supply chain engagement*			
	2022	**2023**	**2024**
Supply chain emissions covered by an approved SBT	NA	40.2%	39.9%
Colt Group suppliers that have committed to an SBT (by % of emissions)	NA	4.1%	2.5%
Colt Group suppliers who have signed a Sustainability Schedule with Colt Group	NA	0.9%	14.4%
Number of suppliers who have signed the SBTi Schedule	NA	6	61
Suppliers that have signed the Colt Group Supplier Code of Conduct**	89%	89%	76%
Suppliers who have been engaged on ESG topics	70.4%	72.7%	69.0%
Percentage of suppliers with contracts that include clauses on environmental, labour and human rights requirements	65.0%	68.6%	61.9%
Percentage of buyers across all locations who have received training on sustainable procurement	100%	100%	100%

*The Sustainability Schedule was introduced in 2023.
**Whilst we have maintained our efforts in responsible value chain management and supplier engagement on ESG topics, the overall decrease when comparing 2024 and 2023 figures is broadly due to the increase in the total number of suppliers as a result of the integration of Lumen EMEA.

Global Reporting Initiative (GRI) content index

Statement of use	Colt Group has reported in accordance with the GRI Standards for the period 1 January 2024 – 31 December 2024.

GRI 1 used	GRI 1: Foundation 2021

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 2: General Disclosures 2021	2-1 Organisational details	Colt Technology Services Group Limited's ('the Company') principal activity is to act as an intermediary holding company within the group comprising Colt Group Holdings Limited and its subsidiaries ('the Group'). The Company is a private company limited by shares, and is incorporated and registered in England and Wales, UK. The address of its registered office is Colt House, 20 Great Eastern Street, London, England, EC2A 3EH. We were founded in 1992 as City of London Telecommunications (COLT), backed by Fidelity. We expanded our operations into Europe, Japan and the United States in the following two decades. In 2010, we rebranded from COLT to Colt Technology Services, and in 2014, we extended our reach into Asia Pacific and the United States. In 2015, Colt Group was delisted from the London Stock Exchange and formed two operationally distinct businesses: Colt Technology Services (Colt) and Colt Data Centre Services (DCS). Colt Group is owned by Fidelity Investments, solidifying us as one of the most financially stable businesses in our industry. In 2023, Colt Group acquired the Lumen EMEA business, which comprised the purchase of 49 entities. The acquisition has extended Colt Group's reach further into Eastern Europe and parts of Africa. Colt Group has subsidiaries in the countries listed in the Subsidiary undertakings section of the latest consolidated financial statements filed at **Companies House**.
	2-2 Entities included in the organisation's sustainability reporting	Colt Group has 117 subsidiary undertakings, as per the latest consolidated financial statements filed at **Companies House**.
	2-3 Reporting period, frequency and contact point	This is Colt Group's fourth Sustainability Report. These reports are published on an annual basis in June of the following year. This report covers the period 1 January 2024 - 31 December 2024. This report is published on Colt's website. For more information, please contact: **ESGTeam@colt.net**

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 2: General Disclosures 2021	2-4 Restatements of information	**Employees** Through 2023, we defined people employed by Colt Group in line with our internal Headcount Sourcing Policy: number of people employed by Colt Group who are captured in our core HR system. This included the following employment types: Employee, Apprentice, Graduate Rotational, Intern, Contractor Ongoing, Contract Trainee, Fixed Term Employee. Temporary Professional Service Providers/Statement of Work contractors, who were sourced in accordance with Colt Procurement policy were excluded. "IReq contractors" were individuals who were although in effect working directly for Colt Group, weren't treated as employees, they were managed on a day-to-day basis by Colt Group management, were sourced by Colt Group's RPO provider, they were tracked in Colt Group Systems and were included in headcount reporting. Inactive workers, i.e. those on long term leave but still directly or indirectly employed by Colt Group, were also included. Employees in this report refers to the following definition: the number of people employed by Colt Group, who are on Colt Group Payroll, including the following person types: Employee, Apprentice - Europe only, Graduate Rotational, Contract Trainee, Fixed Term Employee, Trainee, Student; excluding all contractors, apprentices in India and interns. This excludes Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy, as well as apprentices in India and interns. Inactive workers, i.e., those on long term leave but still directly or indirectly employed by Colt Group in line with our employee definition, are also included. **Health and safety** Prior to 2023, we reported the number of health and safety incidents that resulted in sick leave. Following a review of our reporting procedures, we updated the definition to align with that used by GRI Disclosure 403-9. This resulted in the inclusion of additional incidents for reporting year 2022. **GHG Emissions** Our progress towards net zero **Categories 1 and 2 of Scope 3 for Colt (2019-2023)** Categories 1 and 2 of Scope 3 for Colt (2019, 2022 and 2023) were restated due to an update on spend-based emission factors. We have moved from EORA to EEIO provided by the Carbon Trust. **Scope 1 and 2 and Scope 3 categories 1, 3, 5 for Colt DCS (2019-2023)** With regards to Scope 1, 2 and Scope 3 categories 1, 3, 5 for Colt DCS (2019-2023), the reclassification of some Colt DCS sites not considered under Colt Group's operational control has resulted in a restatement of the historical emissions data associated to this business activity.
	2-5 External assurance	External Assurance Statement by BSI

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 2: General Disclosures 2021	2-6 Activities, value chain and other business relationships	**About Colt Group** Colt operates in the telecommunications and digital infrastructure sector. For more information, please see the **Colt Product Portfolio**. Colt DCS designs, builds and operates data centres in UK, Europe, India and Japan. We provide sustainable data centre solutions to hyperscale and large enterprise customers across 16 state-of-the-art-carrier neutral data centres spanning 8 cities. For more information, please see the **Colt DCS Product Portfolio**. We build partnerships with various groups that go above and beyond to meet our customer's challenges, including through partnership with cloud service providers, system integrators, data centre providers, technology partners, agenda partners and referral partners. For more information, please see **Colt Partners**. Under our Global Social Impact Strategy, we are building collaborations with educational entities, community centres, not-for profits and charities focusing our efforts on digital education and inclusion by helping underrepresented groups and excluded youth discover their potential in the digital industry, find employment and to become engaged and connected citizens. For details on our work with these organizations, please see **Driving social impact** and **Colt Charity Partners**. There have not been significant changes to Colt's operations, value chain, or other business relationships since the last reporting period.
	2-7 Employees	**Supporting our workforce** **Data tables: Total number of full-time and part-time employees, and a breakdown by gender and by region** **Data tables: Total number of permanent and temporary employees, and a breakdown by gender and by region** Colt Group employees in this report refers to the following definition: the number of people employed by Colt, who are on Colt Payroll, including the following person types: Employee, Apprentice - Europe only, Graduate Rotational, Contract Trainee, Fixed Term Employee, Trainee, Student; excluding all contractors, apprentices in India and interns. This excludes Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy, as well as apprentices in India and interns. Inactive workers, i.e., those on long term leave but still directly or indirectly employed by Colt Group, are also included. Headcount as of December 31, 2024.
	2-8 Workers who are not employees	Contractors ongoing, Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy are excluded. Omission: Information incomplete due to lack of data granularity.
	2-9 Governance structure and composition	**Our Board** Our Board of Directors includes eight members, none of whom are independent. Members of our Board of Directors joined in 2012 (M. Wilens), 2015 (A. Johnson, J. Uhrig), 2018 (C. Griffin Pain), 2020 (K. Gilder), 2024 (S. Streeter, S. Neff, J. Avery) and 2025 (T. Cohen). Colt Group's approach to diversity is reflected in the Board's composition, where there is a range of experience, including various other positions and commitments with other Boards, industry councils and non-profit institutions. For more information, please see **Our Leadership Team**.
	2-10 Nomination and selection of the highest governance body	Colt's shareholders appoint directors of the Board, which is the highest governance body of Colt Group. Colt's approach to diversity is reflected in the Board's composition, where there is a range of experience. The board members bring to the board knowledge on AI, big data, management information systems, finance and marketing.
	2-11 Chair of the highest governance body	**Michael Wilens** was appointed as a non-executive Board member of Colt Group's top company on 1 January 2012 and as Chairman on 21 March 2018.

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 2: General Disclosures 2021	2-12 Role of the highest governance body in overseeing the management of impacts	**Responsible business practices** As per the latest consolidated financial statements filed at **Companies House**.
	2-13 Delegation of responsibility for managing impacts	As per the latest consolidated financial statements filed at **Companies House**.
	2-14 Role of the highest governance body in sustainability reporting	The Executive Leadership Team, Colt DCS Senior Leadership Team (SLT) and the ESG SteerCo provide the final approval of the Sustainability Report before publication.
	2-15 Conflicts of interest	The management of conflicts of interests takes a similar approach to previous years, as seen in Colt's **2023 Sustainability Report**, page 62. Colt Group's **Code of Business Conduct** sets out the way we do business. It covers our standards and commitments towards ethical conduct, anti-corruption, anti-bribery, anti-fraud, conflicts of interest, whistle-blowing and legal compliance. These standards extend to Colt and DCS' suppliers as well as new Lumen EMEA suppliers, partners, agents, employees and subcontractors, within the Colt Supplier Code of Conduct and Colt Partner Code of Conduct. In 2024, we made several updates to our Code of Business Conduct, including additional guidance on declaring conflicts of interest, confidentiality of reports and clarity on how to report actual or suspected breaches of the Code.
	2-16 Communication of critical concerns	Colt Group has established a whistle-blowing system, and our employees are encouraged to raise actual or suspected breaches of the Code of Business Conduct to the Ethics Committee, DCS Governance Committee, Business Ethics Line or to line managers, at the earliest opportunity, even if the nature of the issue is in doubt. No person reporting a suspected violation will be subject to retaliation because of a good faith report. Anonymous reporting is possible wherever permitted by local law. The Colt Ethics Committee and Colt DCS Governance Committee report quarterly to the Audit Committee and DCS Audit Committee respectively about breaches or suspected breaches, raised to these committees or via the Business Ethics Hotline, of the Code of Business Conduct. Specific information on critical concerns that were communicated to the Board are not externally communicated for confidentiality reasons.
	2-17 Collective knowledge of the highest governance body	As per the latest consolidated financial statements filed at **Companies House**. Colt has mechanisms to maintain an environmentally competent board, such as consulting regularly with an internal, permanent, subject-expert working group, engaging regularly with external stakeholders and experts on environmental issues and attending regular trainings on environmental issues, evolving standards and best practises.
	2-18 Evaluation of the performance of the highest governance body	As Colt Group is a private company, there is no obligation to fulfil this requirement.
	2-19 Remuneration policies	As per the latest consolidated financial statements filed at **Companies House**.
	2-20 Process to determine remuneration	As per the latest consolidated financial statements filed at **Companies House**.
	2-21 Annual total compensation ratio	Omission: Confidentiality reasons.
	2-22 Statement on sustainable development strategy	**Colt Group ESG strategy**

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 2: General Disclosures 2021	2-23 Policy commitments	Our policy commitments have been approved by our CEOs. Our suppliers are also aware of our commitments. Policy commitments can be seen in • **Responsible value chain** • **Human rights** • **Code of Business Conduct** • **Supplier Code of Conduct** • **Partner Code of Conduct** • **Certifications**
	2-24 Embedding policy commitments	Colt Group's policy commitments are embedded in the sustainability, DEI, procurement and other programmes. Our policy implementation responsibilities are delegated to functional leads across the Colt Group. Our policy commitments are also embedded in our Business and Supplier Codes of Conduct. Colt Group's **Code of Business Conduct** is a comprehensive document for ethical conduct including critical aspects such as not tolerating bribery, speaking up to report breaches of the Code, fair competition, data protection, gifts and business hospitality, anti-fraud, prevention of money laundering and conflicts of interest. All Colt Group employees must complete annual mandatory training about the Code of Business Conduct.
	2-25 Processes to remediate negative impacts	Every breach of the Code of Business Conduct is raised in line with the below response in 2-26. All reports of suspected or actual breaches of the Code of Business Conduct raised to the Colt Ethics Committee and Colt DCS Governance Committee are fully investigated, and these committees use lessons learned to update the Code on an annual basis, to provide recommendations on the annual mandatory Code of Business Conduct training and on organisational changes.
	2-26 Mechanisms for seeking advice and raising concerns	Colt Group has established a whistle-blowing system, and its employees are encouraged to raise actual or suspected breaches of the Code of Business Conduct via the choice of available channels. Reports can be made via the independent 24/7 Business Ethics Line or by reporting to the Colt Ethics Committee or the Colt DCS Governance Committee. Anonymous reporting is possible wherever permitted by local law. These committees reports quarterly to the Audit Committee about breaches or suspected breaches of the Code of Business Conduct. The members of the Colt Board and its subcommittees receive training around their duties when appointed.
	2-27 Compliance with laws and regulations	Colt is committed to the highest possible legal and ethical standards. It is not our policy to merely comply with the letter of the law, but rather to instil and maintain a true culture of compliance with all laws, rules and regulations wherever we do business. This is outlined in the Colt Group Code of Business Conduct. The Ethics Committee is responsible for reviewing any suspected compliance breaches. The Colt Board's Audit Committee oversees the Ethics Committee regarding breaches or suspected breaches of the Code. We encourage employees to raise breaches of the Code of Business Conduct through the independent Business Ethics Line or by reporting to the Ethics Committee. We have structures in place for anonymous whistleblowing wherever it is permitted by local law. Specific information on significant incidents of non-compliance with laws and regulations are not externally communicated for confidentiality reasons.
	2-28 Membership associations	In 2024, Colt Group participated in several associations and organizations, including European Data Centre Association (EUDCA), TechUK, the Global Enabling Sustainability Initiative (GeSI), Metro Ethernet Forum (MEF).

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 2: General Disclosures 2021	2-29 Approach to stakeholder engagement	Colt Group identifies its key stakeholders in accordance with the Wates Principles for Large Private Companies.

Customers: We aim to put the customer at the heart of everything we do, and we have an ever-evolving programme of customer intelligence that helps us to improve the experience we give our customers. Examples of engagement include:
- Customer information service
- Customer satisfaction surveys
- Website, social media
- Net Promotor Score (NPS)
- Net Easy Score and programme '100 voices' to collect feedback
- Customer Advisory Board held several times a year

Employees: Engaging with and having a two-way dialogue with the entire workforce is very important for the Company's purpose and vision. We operate a wide range of engagement tools to interact with employees. Examples of engagement include:
- Pulse surveys & strategic surveys
- Townhall meetings
- Whistle-blowing channels
- Employee reviews
- Colt Ambassador and Country Management programmes
- Employee Networks
- Through people leaders
- Dialogue with European Works Council (EWC) and National Works Council (NWC)
- Focus groups

Board/owners: We are a private company owned by Fidelity Investments, solidifying us as one of the most financially stable businesses in our industry. Examples of engagement include:
- Regular management reporting
- Management reports
- Annual financial report
- Annual sustainability report
-

Contractors and suppliers: Successful relationships with suppliers are critical for the day-to-day running of our business and supporting our service provision to our customers. Examples of engagement include:
- Supplier engagement programs, including a dedicated program with suppliers responsible of 93% of Colt Group emissions in PG&S and Capital Goods categories
- Regular supplier communication on policies and expectations, including supplier days
- Supplier Code of Business Conduct
- Vendor surveys

Industry peers: We regularly engage with our sector peers, as well as ICT and telecommunications-specific associations around the world. For example, we hold membership in industry associations, including the Global Enabling Sustainability Initiative (GeSI), Metro Ethernet Forum (MEF) and many others.

Communities: Connecting with our local communities is a crucial part of our engagement programme. We are aware that we can only operate efficiently if we receive a local licence to operate. Examples of engagement include:
- Dialogues and direct action
- Local community engagement programs
- Volunteering activities
- Press releases

For more information, please see the latest consolidated financial statements filed at **Companies House**.

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 2: General Disclosures 2021	2-30 Collective bargaining agreements	**Human rights** Colt Group is committed to creating an environment that promotes fair treatment and a healthy work-life balance. As a result, we aim to keep working overtime to an absolute minimum and have implemented a Global Overtime Policy. The purpose of our Global Overtime Policy is to provide a general guideline for employees who are eligible for overtime, above the maximum statutory or agreed working hours. The Global Overtime Policy implements a minimum standard and provision to be applied across Colt Group subject local law and/or local policies. Overtime shall not exceed the legal limit as per each country's local regulations or HR policy. Employees are advised to take at least 24 hours of rest within 7 consecutive days. Colt Group provides additional remuneration to compensate for overtime work as per local law and/or local policies.
Material topics		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	**Colt Group ESG strategy** **Double Materiality Assessment**
	3-2 List of material topics	**Colt Group ESG strategy** **Double Materiality Assessment** The topics of water and biodiversity are absent from this report as these were deemed as not material as a result of the DMA. As a company with data centre activities we are aware that water consumption is a growing concern in the industry. Colt DCS has significant water efficiency measures in place and only two sites (out of 11) have an adiabatic cooling system. Data centres from Lumen EMEA have a closed-loop water system, where water is continuously moving through the system and undergoes cooling or heating processes before being reused. As per biodiversity, new designs consider biodiversity impacts and most data centre constructions occur on brownfield sites.
Economic performance		
GRI 3: Material Topics 2021	3-3 Management of material topics	**Risk management**
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	**Risk management** Colt Group's related risk assessments covers various types of risks, including current and emerging regulations, legal, market, reputation, and both acute and chronic physical risks. Additionally, several business opportunities have been identified resulting from climate change, such as the emerging market for low emissions goods and services, increased potential use of cloud computing, and the adoption of hybrid working. For further information, please refer to our Climate-related Financial Disclosures (CFD) in 2024 financial statements to be filed at **Companies House**.
Anti-corruption		
GRI 3: Material Topics 2021	3-3 Management of material topics	**Business ethics**

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	**Business ethics** In addition to mandatory annual Code of Business Conduct training, Anti-Bribery and Corruption (ABC) training is assigned to all Colt and Colt DCS colleagues. This training is typically delivered biannually. In order to provide training to Lumen EMEA employees, the training that would typically take place in 2024 will be delivered starting May 2025. Starting in 2025, this training will be included in the mandatory training programme on an annual basis.
Energy		
GRI 3: Material Topics 2021	3-3 Management of material topics	**Our progress toward net zero** **Renewable energy and sustainable transport**
GRI 302: Energy 2016	302-1 Energy consumption within the organization	**Our progress toward net zero** **Renewable energy and sustainable transport** **Data tables: Energy consumption** **Greenhouse gasses calculation methodology**
	302-4 Reduction of energy consumption	**Renewable energy and sustainable transport**
Emissions		
GRI 3: Material Topics 2021	3-3 Management of material topics	**Our progress toward net zero** **Carbon reduction strategy**
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	**Our commitment to the environment** **Data tables: Colt Group GHG emissions in metric tonnes CO_2e (including Lumen EMEA)*** **Greenhouse gasses calculation methodology** Colt Group has an intranet area for employees explaining our baseline emissions, progress and road-map for reduction. We believe that communicating this information internally has a positive impact on our carbon roadmap. We have prepared our organisational GHG emissions in accordance with the GHG Protocol, reporting CO_2-equivalent values inclusive of all relevant GHGs.
	305-2 Energy indirect (Scope 2) GHG emissions	**Our commitment to the environment** **Data tables: Colt Group GHG emissions in metric tonnes CO_2e (including Lumen EMEA)*** **Greenhouse gasses calculation methodology** We have prepared our organisational GHG emissions in accordance with the GHG Protocol, reporting CO_2-equivalent values inclusive of all relevant GHGs. We quantify and report our organisational GHG emissions in alignment with the GHG Protocol; therefore, we only report CO_2e emissions.

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 305: Emissions 2016	305-3 Other indirect (Scope 3) GHG emissions	**Carbon reduction strategy** **Data tables: Colt Group GHG emissions in metric tonnes CO_2e (including Lumen EMEA)*** We have prepared our organisational GHG emissions in accordance with the GHG Protocol, reporting CO_2-equivalent values inclusive of all relevant GHGs. We quantify and report our organisational GHG emissions in alignment with the GHG Protocol; therefore, we only report CO_2e emissions.
	305-5 Reduction of GHG emissions	**Carbon reduction strategy** **Data tables: Colt Group GHG emissions in metric tonnes CO_2e (including Lumen EMEA)***
Waste		
GRI 3: Material Topics 2021	3-3 Management of material topics	**Waste reduction and circular economy** We have formalised policies through our Waste Management Policy, Duty of Care (Waste Control) Procedure and WEEE Disposals Policy and Procedure to manage the waste and Waste Electronic and Electrical Equipment generated by our activity. Duty of Care (Waste Control) procedure define the process to ensure third parties manages the waste in accordance with legal requirements.
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	**Waste reduction and circular economy** **Data tables: Waste**
	306-2 Management of significant waste-related impacts	**Waste reduction and circular economy**
	306-3 Waste generated	**Waste reduction and circular economy** **Data tables: Waste** In 2023 we improved the standardization of waste data from our operations in Europe and also from our Investment Recovery Partners. We continue to work on the standardization of waste type across the whole organisation and improve our waste data collection strategy to achieve greater accuracy and quality. Our aim is to provide the breakdown of Colt Group composition of waste in the Sustainability Report. We do have included the main types of waste included in the hazardous and non- hazardous figures. In 2024 we updated the calculation of waste generation data to exclude redundant network equipment, as these devices are going to refurbishment and recycling companies. Duty of Care (Waste Control) procedure define the process to ensure third parties manages the waste in accordance with legal requirements.
	306-4 Waste diverted from disposal	**Waste reduction and circular economy** **Data tables: Waste** Comments on Disclosure 306-3 also applicable. All waste generated by Colt Group is managed by third party waste companies in accordance with local legislation and the Duty of Care (Waste Control) procedure.

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 306: Waste 2020	306-5 Waste directed to disposal	**Waste reduction and circular economy** **Data tables: Waste** Comments on Disclosure 306-3 also applicable. All waste generated by Colt Group is managed by third party waste companies in accordance with local legislation and the Duty of Care (Waste Control) procedure.
Supplier environmental assessment		
GRI 3: Material Topics 2021	3-3 Management of material topics	**Responsible value chain** **Our progress towards net zero**
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	**Responsible value chain** **Our progress towards net zero**
Employment		
GRI 3: Material Topics 2021	3-3 Management of material topics	Colt Group prioritises transparency and reciprocal expectations. The details of working conditions are captured in the employment contract and employee handbooks of each country. These are communicated with the employee at the time of hiring and are available on the Colt Group internal portals. Colt Group also provides Ask HR — a platform where employees can find information about global and local HR policies and understand how they apply to them. In certain jurisdictions all employees are covered by collective bargaining agreements. All employees receive full **Code of Business Conduct** training and HR support is available for further guidance. Colt is progressing with a phased implementation plan for integrating Lumen EMEA employee contracts, with a country-by-country approach. This plan takes into account key factors such as cost, integration timelines (e.g. legal entity consolidation), team and Works Council capacity, and legal considerations. Both global and local policies relevant to contract integration are also being reviewed. Where local policies are linked to global ones, these dependencies will be addressed to ensure aligned implementation. Beyond contract-related policies, several broader global policies are scheduled for harmonisation over the next 12 months. The overall aim is to align employees joining from Lumen EMEA with Colt's core global policies wherever feasible.
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	**Our people and culture** **Data tables: Total number and rate of new employee hires and turnover during the reporting period, by gender and region** **Data tables: Total number and rate of new employee hires and turnover during the reporting period, by gender and age group**

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 401: Employment 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	<u>Our people and culture</u> <u>Health, safety and wellbeing</u> Colt Group benefits are available to all full-time and part-time employees, with the exception of ongoing contractors. Colt Group provides: • Pension • Life assurance* • Disability insurance* • Medical insurance* • Company holiday entitlement • Employee Assistance Programme (EAP) - Provided in all countries, employees access this online or via their local phone number • Clear your plate days - These are added to employee calendars usually 3rd Wednesday every month, where an employee does not need to attend or accept a meeting and can take time away from their computers. In some countries, employees are eligible for additional benefits such as dental insurance, health assessments, cancer screening and meal vouchers. *Benefits not offered in all geographies due to market practices. We benchmark our benefits annually to ensure that they meet stakeholder expectations and local requirements.
Occupational health and safety		
GRI 3: Material Topics 2021	3-3 Management of material topics	We define strategies that promote a culture of incident prevention and health promotion. Health and safety is discussed with employee representatives at different levels: EWC, National Workers Councils and specific Country Health and Safety Committees (where legally applicable), and in other countries (as best practice). Colt Group provides a safe and healthy workplace, and we continuously strive to improve workplace safety and employee awareness and behaviour. Colt Group's Health and Safety Policy Statement sets out our health and safety commitments to effectively manage and safeguard the health and safety of our employees (including those who joined from Lumen EMEA), contractors and any others who may be affected by our activities. We are committed to designing and implementing a comprehensive health and safety management system which identifies legal compliance requirements and risks and delivers mitigations in a consistent, effective and transparent manner following the principles of ISO 45001:2018 standard. We define strategies that promote a culture of incident prevention and health promotion. We provide safe and healthy working conditions to prevent work-related accidents, injuries and ill-health. Our Lumen EMEA legal entity in UK has a certified ISO 45001:2028 management system.
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	At Colt we maintain a health and safety management system designed to meet the requirements of ISO 45001:2018 integrated with our environmental management system on ISO 14001:2015. Our Lumen EMEA legal entity in UK has also a certified ISO 45001:2028 health and safety management system also integrated with an ISO 14001:2015 environmental management system.

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 403: Occupational Health and Safety 2018	403-2 Hazard identification, risk assessment and incident investigation	A risk assessment procedure has been developed as part of our OHSMS. Due to the complexities of Colt's countries of operation and local legislative demands, some risk assessments are conducted by specialised service providers and in other situations several templates are available for use by Colt staff. Health and safety assessments focus on the identification of existing and reasonably foreseeable hazards. Those hazards are then quantified to establish a level of risk which in turn promotes consideration of an appropriate control measure. Any finding is reported through the OHSMS management review mechanisms and used to continually improve our system. The Colt Group generic assessments for Technical and Office activities are managed through the Colt HS&E support structure. Internal audits are done periodically to ensure and verify our OHSMS implementation. Any Colt Group employee receives the corresponding health and safety training in accordance with the competency needed for their involvement on the OHSMS. Hazardous substances risks are also considered and a specific process exist for the use, storage and disposal of hazardous substances. Internal audits and site inspections are performed periodically to ensure and verify our OHSMS implementation. Employees are provided with necessary Personal Protective Equipment (PPE) in accordance with their risk assessment.
	403-3 Occupational health services	Colt provides occupational health services such as health and safety risk assessments, health checkups, mental health support, health and safety training, health and safety legal compliance support, etc. To ensure the quality of these services, Colt's health and safety management system is designed to meet the requirements of ISO 45001:2018 and some entities within Colt hold ISO 45001:2018 certification. In addition, we only use, when required, recognised licensed service providers in accordance with local regulation. Personal health–related information and data are protected by Colt's Code of Business Conduct, our Global Privacy Policy and the Data Protection Governance Policy.
	403-4 Worker participation, consultation and communication on occupational health and safety	While a Health and Safety Steering Committee (SteerCo) runs the overall governance of Colt's Occupational Health and Safety Management System (OHSMS), employees participation is conducted through local Health and Safety Committees in accordance with national regulations. In countries where these committees are not legally required, we have them as best practice. These Health and Safety Committees have equal representation between company and employees (that are selected among the employees in accordance with national regulations where applicable). They are reported on the performance of the OHSMS, including the tracking and follow up of actions included in the country Annual Health and Safety Plan, and intervene in the definition of the health and safety activities (e.g. processes review, risk assessments, training needs, emergency preparedness activities, etc.). Health and safety is communicated at global and local level in accordance with OHSMS needs. A Health and Safety Portal is available to all the employees where all the required health and safety information and guidance is available for public consultation, including risk assessments, procedures, training and guidance documents. In Europe, health and safety provisions are included in applicable Collective Bargaining Agreements and vary by country.

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 403: Occupational Health and Safety 2018	403-5 Worker training on occupational health and safety	Subcontractors are contractually requested to comply with the applicable legal health and safety regulations as employers. In some countries proof of health and safety training provision is requested to subcontractors. Contractors are required to complete mandatory health and safety training provided by Colt Group. In addition, health and safety training materials are given and different awareness activities are done as part of the health and safety management of third parties and specially for the riskiest activities when working at Colt Group sites. A training matrix exists as part of our OHSMS training procedure. It includes: • A compulsory training programme for any new joiner in accordance with country regulations and also a global set of health and safety modules where no specific requirements are set. These modules are: Basic Health and Safety, Fire Safety and Stress Management. Also an online tool provides training and includes a self-assessment questionnaire on their own workplace to all the employees using display screen equipment. • A periodic mandatory health and safety refresher training package for all employees. • Applicable to operational staff: Staying Safe on the Road, Working at Height, Hazardous Substances, Stress Management, Asbestos Awareness and Behavioural Safety. • Applicable to specific groups: examples of training include Formal safety qualifications for HS&E team, Fire Warden and First Aiders training, trade training for engineering staff to maintain relevant legislative compliance, and specific risks training for site managers.
	403-6 Promotion of worker health	**Health, safety and wellbeing** Occupational Health Services are offered according to health and safety legal requirements in various countries. This include, but not only, initial and periodical medical check-ups and seasonal flu vaccinations. Also, Colt offers private medical insurance as social benefit and an Employee Assistance Programme that includes Psychological support services. Finally, different range of health promotion activities are conducted in different countries as part of wellbeing activities (workshops, mindfulness sessions, etc.) and it has an awareness programme concerning menopause.
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Colt's suppliers expected to comply with its Supplier Code of Conduct, which requires that suppliers provide a safe working environment for staff and subcontractors. Further, Colt has a Vendor Risk Management process that includes specific health and safety questionnaires when selecting suppliers. By spend, more than 90% of Colt's suppliers have signed contracts with human rights requirements. Additionally, Colt has actions regarding customer health and safety which are integrated in HSE policy. Each site where customers may visit have their own health and safety instructions and key contacts on site. In addition, a Colt Emergency Line exists to register any emergency situation that may occur in our sites (including customer incidents). Also, customers may raise any query/concern using the standard customer support service at **https://www.colt.net/support/**.
	403-8 Workers covered by an occupational health and safety management system (OHSMS)	100%, All employees are covered by a Health and Safety Management system. Some by one externally ISO 45001 certified, others by a fully aligned to ISO 45001 standard and others by one in accordance with local legal requirements.
	403-9 Work-related injuries	**Health, safety and wellbeing** Partial omission: We do not have data available for workers who are not employees but whose work and/or workplace is controlled by the organization: We will work for improving data gathering in next annual report. For work-related hazards requirement please refer to disclosure '403-2 Hazard identification, risk assessment and incident investigation'

GRI Standard/Other source	Disclosure	Location/Direct answer
GRI 403: Occupational Health and Safety 2018	403-10 Work-related ill health	**Health, safety and wellbeing** Partial omission: We do not have data available for workers who are not employees but whose work and/or workplace is controlled by the organization: We will work for improving data gathering in next annual report For work-related hazards requirement please refer to disclosure '403-2 Hazard identification, risk assessment and incident investigation'
Training and education		
GRI 3: Material Topics 2021	3-3 Management of material topics	**Training and professional development**
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	**Training and professional development** Omission: Information unavailable/incomplete
	404-2 Programs for upgrading employee skills and transition assistance programs	**Training and professional development** **Data tables: Employee training**
Diversity and equal opportunity		
GRI 3: Material Topics 2021	3-3 Management of material topics	**Commitment to DEI** The Colt Code of Conduct outlines the standards of conduct that we hold our employees, suppliers and customers to account. It provides contact details for the Corporate Compliance Committee and the Business Ethics Line, which can be used to raise potential violations of the Code of Conduct, including discrimination and harassment issues. Our global reward principles are committed to ensuring our pay practices support consistent and fair decisions regardless of any protected characteristics. We currently produce and monitor the gender pay gap in some countries, and annually monitor base pay and bonus decisions through a gender lens during our global pay review process. In addition, we are currently reviewing the principles of the EU Pay Transparency Directive ahead of 2026 to look for new opportunities to add to our principles and approach globally. In 2024, Colt's UK overall mean gender pay gap for hourly pay was 17%. This is a 9% increase compared to 2023 and is due to several factors, including fewer women occupying senior roles as a proportion of the overall population and differences in pay practices inherited from Lumen EMEA. Despite the gender pay gap increase, we have made progress in addressing the bonus gaps. The mean bonus gap significantly reduced by over 27%, and the median bonus gap decreased by almost 9%. You can read the full details in Colt's 2024 UK Pay Gap Report, as well as the 2024 UK Gender Pay Gap Report for Lumen UK. In Spain, Barcelona Shared Service Centre's salary gap in 2024 was 2,48% (compared to 3,11% in 2023) and for Colt Spain it was 6.72% (compared to 7.73% in 2023). We formally registered our Gender Equality Action Plan to the Spanish Labour Authority and maintain our commitment with the Diversity Charter. Colt in Spain continues to work on closing the pay gap, arranging mentorships for female STEM students and attracting female candidates to mostly male dominated roles. In 2024 Colt In Spain obtained the EFR accreditation granted by Fundación MásFamilia which is a recognition for companies that actively work on promoting work-life balance and equality among its talent.
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	**Commitment to DEI** **Responsible business practices** Partial omission: Information incomplete due to confidentiality reasons.

GRI Standard/Other source	Disclosure	Location/Direct answer
Local communities		
GRI 3: Material Topics 2021	3-3 Management of material topics	**Driving social impact**
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments and development programs	**Driving social impact**
Supplier social assessment		
GRI 3: Material Topics 2021	3-3 Management of material topics	**Responsible value chain** **Data tables: Supply chain engagement**
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	**Responsible value chain** **Data tables: Supply chain engagement**
Customer privacy		
GRI 3: Material Topics 2021	3-3 Management of material topics	**Data privacy and cybersecurity**
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Omission: Confidentiality constraints.

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Sustainability Report 2024

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