

colt

SUSTAINABILITY REPORT.

2025



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INTRODUCTION

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LETTER FROM OUR CEO,

COLT TECHNOLOGY SERVICES

We aim to make sustainability integral to how we build, operate, and grow Colt. As a provider of critical digital infrastructure, we have a responsibility to deliver high-performance connectivity while minimising our environmental impact, supporting our people, and creating long-term value for customers and society.

Over the past year, we have continued to modernise Colt's network and estate, retiring legacy equipment, improving energy performance across our most critical sites, and embedding sustainability considerations into the design of our products and platforms. These actions are not incremental. They reflect a deliberate shift toward infrastructure that is more efficient, resilient, and fit for the future.

We also made progress on our journey to net-zero. Since our 2019 baseline, we have reduced total Scope 1, 2 and 3 market-based greenhouse gas emissions by 40%. This progress has been driven by sustained investment in energy efficiency across our network and estate, alongside the expansion of renewable electricity procurement across our global footprint. In parallel, we have continued to advance our circular economy initiatives, including the reuse, recycling and responsible decommissioning of legacy equipment. These efforts demonstrate how operational discipline and environmental responsibility go hand in hand.

At the same time, we recognise that emissions across our value chain remain a challenge, with Scope 3 emissions increasing as our business

grows. Addressing these requires close collaboration with our partners and suppliers, and we are strengthening our engagement to support decarbonisation across the broader ecosystem.

This year was also marked by final stages of the integration of Lumen EMEA activities into Colt's decarbonisation strategy. Bringing these teams and assets fully into our approach has allowed us to unify processes, strengthen our organisation, and enable responsible growth as one company, without compromising our sustainability commitments.

Innovation continues to be a powerful lever for progress. We accelerated the evolution of our digital infrastructure, delivering smarter, more efficient services. At the same time, we advanced major breakthroughs, including quantum secured networking, intent-based routing, and highly energy efficient optical platforms designed to support the next wave of AI and cloud workloads.

Our achievements in automated and high-performance connectivity have been recognised globally, with seven MEF NaaS Excellence Awards and multiple industry innovation accolades. While we value this recognition, it matters most because it reflects real impact for customers.

Equally important is our commitment to people. We continued to build an inclusive, high-performing culture through expanded employee networks, new global office accessibility standards, strengthened

wellbeing programmes, and improved representation and inclusion outcomes. Leadership development remains a priority, with flagship programmes such as Leadership Impact Accelerator, Aspire to Lead, and Ascending the Leadership Summit helping to build capability and confidence at every level.

Finally, we continued to support our communities through initiatives that expand access to digital skills and opportunities such as Tech to the Rescue and Meet and Code, and earning new external recognition for our progress on closing the digital divide with Ignite Hubs.

Sustainability is a journey, not a destination. This report reflects our commitment to progress, accountability, and continuous improvement and to building a more connected, resilient, and responsible future.

Keri Gilder,
Chief Executive Officer



LETTER FROM OUR CSO, COLT DATA CENTRE SERVICES

2025 was another year of strong growth for Colt DCS. Alongside this growth, we continued to strengthen our ESG performance, maintaining 100% renewal electricity sourcing and advancing our pathway toward net-zero. We broke ground on the first of two new data centre campuses in Paris, which will provide 170 MW of capacity on completion in 2031. In Japan, we completed Inzai 4 in Tokyo and successfully delivered our 40.5 MW Keihanna data centre in Osaka.

In Germany, construction continued on our 32.4 MW Frankfurt 3 facility, alongside the announcement of two new site acquisitions capable of supporting 63 MW in Frankfurt and 54 MW in Berlin. Meanwhile, fitout progressed at the first data centre on our 160 MW Hayes campus, with planning approval secured for future phases. Throughout this period of expansion, we maintained resilient operations with no major outages, demonstrating the robustness of our infrastructure and operational controls at scale.

Alongside this, we strengthened our development pipeline through new strategic partnerships across

Asia. In Japan, we entered a new partnership with ESR, a leading Asia-Pacific real asset owner and manager, for the development of the first phase of a 90 MW hyperscale data centre site in Minoh City, Osaka. In India, we continued to scale in Mumbai and Chennai through our partnership with RMZ, one of the world's largest family-owned alternative asset owners. These partnerships enable us to combine global design standards with local expertise, enhancing both delivery efficiency and sustainability outcomes for our customers.

All of this has been delivered by our dedicated teams and partners across eleven countries, while remaining firmly focused on our ESG priorities: decarbonising our business, connecting people, and safeguarding our company. Our ESG strategy is overseen at the highest levels of the organisation, ensuring accountability for performance and alignment with long-term value creation. We see significant progress in several key areas:

A turning point in how we design and deliver data centres

As demand for AI and cloud services continue to grow, we are advancing how we design, build, and operate our data centres. In 2025, we optimised the Global Reference Design (GRD) document, which is serving as a repeatable and standardised blueprint design to industrialise the way we develop our upcoming data centres with a strong focus on modularity, scalability and flexibility. This has enabled us to embed greater energy efficiency principles, lower embodied carbon materials and near-zero wastewater advanced cooling technologies into the core architecture. Using

modularisation means we can build faster and at larger scale, while using fewer materials, less on-site labour, and generating less waste. In 2026 and beyond, we will continue to expand the application of these design standards across all new developments.

Navigating environmental challenges

Rapid industry growth is amplifying long-standing challenges, especially in how nations plan to supply power for future digital infrastructure. Against this backdrop, we continue to procure 100% renewable electricity, supported by energy attribute certificates covering more than 70 GWh, while investing in advanced, more energy efficient equipment and heat recovery infrastructure. While we're making progress towards our target to become net-zero by 2045, achieving this is increasingly complex across our growing business and value chains. Supply chain emissions have risen, particularly related to construction. The use of whole life carbon assessments has made it possible to evaluate the environmental impacts of our design and delivery choices, and make informed decisions tailored to each location. Addressing embodied carbon in our supply chain will remain a key priority in the coming years.

Be an employer of choice

This year, we welcomed more than 100 new colleagues to the team. In recognition of our commitment to create a workplace where people feel safe, supported and empowered to develop, Colt DCS achieved the Great Place To Work certification and won The Best Talent Developer of the Year at the Data Centre World Awards. Building on this

commitment, and with demand for mechanical, electrical and skilled trades continuing to rise, we will keep investing in internal training and upskilling the next generation. We also continue to prioritise health, safety and wellbeing across all our operations as a core component of our ESG approach. In 2025, our Total Recordable Incident Rate decreased significantly to 0.18, down from 0.52 in 2024, reflecting the effectiveness of enhanced risk controls.

Finally, I would like to extend my sincere thanks to all colleagues and partners who, amid a year of global uncertainty and significant organisational change as we transition to an independent business, have once again demonstrated exceptional resilience and a steadfast commitment to moving our business forward. We remain committed to engaging closely with our customers, communities, regulators and partners as we scale responsibly and sustainably.

Quy Nguyen,
Chief Sales
Officer





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 2025 to 31 December 2025, unless otherwise stated. Colt Group reports on an annual basis.

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 Bureau Veritas. More information can be found in the appendix, including the external assurance statement by Bureau Veritas and restatements of information.

COLT GROUP 2025 SUSTAINABILITY HIGHLIGHTS¹

40%

Reduction of total CO₂e market-based emissions since 2019

82%

of fleet comprised of battery or hybrid electric vehicles

7%

rise in employee psychological safety over 2024 (indicated by survey results)

7

MEF Network as a Service (NaaS) Excellence Awards received

95%

of electricity sourced from renewable energy through the purchase of renewable energy certificates (RECs)

64%

of our supply chain Scope 3 emissions are with suppliers that have already set a Science Based Target (SBT) or signed a Sustainability schedule

33%

of all positions held by women

54

One Colt Customer NPS score (55 for EU, 47 for Asia), 23 points higher than industry benchmark of 31²

€3.55 million

Invested in 3,896 units of second-hand equipment and extended the life of 41,683 pieces of equipment via reuse

23 GWh

estimated reduction in electricity consumption from decommissioning end-of-life network equipment

872

days volunteered by employees

400+

new hires with strong early-career representation

€365,678

Donated to charities

¹ Figures presented in this report have been rounded up to the nearest whole number for presentation purposes. Consequently, minor discrepancies may occur between totals and the aggregation of individual amounts.

² Source: CustomerGauge.

THE COLT GROUP

COLT

We're Colt, the global digital infrastructure company. We connect 40+ countries, 32,000 enterprise buildings, 275+ points of presence and 12 cable landing stations. We manage eight subsea cable systems, are Europe's largest B2B fibre provider and co-own the most widely peered network in the world. We power the AI economy.

Founded in London over 30 years ago and privately owned, our 6,000+ colleagues across the world share a deep commitment to delivering an outstanding experience and making every interaction effortless for our customers.

With award-winning fibre infrastructure, digital platforms and security solutions delivered across a network that spans continents, crosses oceans and extends into space, we create extraordinary outcomes for our customers, communities and people.

Industry Awards: MEF Excellence Awards 2025

NAAS SERVICE PROVIDER OF THE YEAR GLOBAL	BEST NAAS VISION GLOBAL	BEST NAAS VISION EUROPE	BEST CARRIER ETHERNET INNOVATION EUROPE	SASE SERVICE PROVIDER EUROPE	BEST NAAS ENTERPRISE CUSTOMER IMPLEMENTATION	SERVICE AUTOMATION LEADERSHIP EUROPE
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For more information about the company, product portfolio and coverage map, visit [the Colt website](#). See more awards [here](#).

AT-A-GLANCE

-  Founded in 1992
-  6,000+ employees across 80 offices in 40 countries
-  32,000 buildings across 230 cities
-  50+ metropolitan area networks and 275 points of presence across Europe, Asia, the Middle East, Africa and North America

THE COLT GROUP





COLT DCS

Colt DCS was established in 2015 as an independent entity. Since then, it 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. Colt DCS is separate from Colt Technology Services, 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](#).

AT-A-GLANCE

-  Established in 2015
-  First data centres built in 1999
-  13 operational data centres
-  19 data centres in development across 11 cities in UK, France, Germany, Netherlands, India and Japan

OUR ESG DIRECTION

The digital infrastructure and data centre sectors can play a critical role in building a more sustainable world. ESG is a core driver of how we grow. It shapes how we win business, attract and retain talent, meet emerging regulations and manage risk in a fast moving industry.

Our ESG strategies for Colt and Colt DCS are designed to accelerate our contribution to a more sustainable future while strengthening Colt Group's financial and competitive performance. They bring together our commitments across people, planet and responsible business, backed by clear governance, measurable progress and a focus on what matters most to our stakeholders.

OUR APPROACH TO ESG IS COMPRISED OF FOUR PILLARS



Innovation

We incorporate sustainability considerations into the design and performance of our digital infrastructure, focusing on energy efficiency and circularity, supporting optimised digital solutions for our customers.



Ambition

We will reduce GHG emissions across our operations and value chain, increase our use of renewable energy, protect natural resources, and become the sustainable supplier of choice, supporting our customers' ESG priorities.



Empowerment

We foster meaningful connections across our workforce, communities and business relationships, grounded in inclusivity and integrity; empowering our employees to thrive and innovate, giving back within communities, and collaborating with suppliers on shared ESG goals and values.



Trust

We meet stakeholder expectations for ethical and responsible business practices as a digital infrastructure and data centre provider through digital trust, strong governance, effective risk management and transparent, data-backed reporting.



STATEMENT FROM COLT'S CLO

"Sustainability is built into our decision making and it shapes how we evolve as a business. We hold ourselves to world-class standards and are continuing to innovate across our digital infrastructure, progressing toward our emissions reduction goals, empowering our people and strengthening trust and governance. There is more to do, but our progress and the dedication behind it give me confidence in the path ahead."

*Caroline Griffin Pain, Chief Legal Officer,
Colt Technology Services*

To find out more about our ESG strategy, visit the [Colt](#) and [Colt DCS](#) ESG websites.

REPORTING & RATINGS

Colt Group is committed to reporting annually on sustainability performance through several global sustainability reporting organisations.



We received an A- from CDP for our 2025 climate change disclosure for the third consecutive year and an A rating for the supplier engagement assessment for the fourth year in a row.



In 2025, we were awarded a Platinum Rating for the fourth consecutive year, placing us once again in the top 1% of EcoVadis-rated companies globally.



Our company is committed to upholding the Ten Principles of the United Nations Global Compact. Please refer to our **Communication on Progress**.

The UNGC is a voluntary initiative based on CEO commitments to implement universal sustainability principles and to support the

UN goals. Colt Group has participated since 2023 and is committed to annually submitting a Communication of Progress (COP) to the UNGC. See our SDG alignment table on [page 79](#).

DOUBLE MATERIALITY ASSESSMENT

Colt Group's approach to sustainability is guided by our double materiality assessment (DMA) results, finalised in 2024. This process helped us identify material topics by considering both the company's impact on people and the planet and the risks and opportunities we face within the broader context.

Our DMA aligns with GRI guidelines and was conducted in preparation for sustainability disclosures required by the European Union's non-financial reporting regulations. To complete the DMA, we established a cross-functional team to oversee the process and engaged an external advisor who supported us as we undertook the following steps.

01. Scoping

Map business model, value chain and stakeholders

Define boundaries and engagement priorities

02. Mapping Impacts, Risks, and Opportunities (IROs)

Benchmark peers and leading reporting standards (IFRS, ISSB)

Interview customers, suppliers, partners, investors, NGOs and experts

Run internal workshops across business lines to identify potential IROs

03. Assessing Materiality

Apply criteria: severity, scope, scale, irremediability and likelihood

Determine impact and financial materiality







04. Validating and Reporting

Internal validation workshops

Assurance readiness review to identify gaps and improvements

FINDINGS FROM THE DMA

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

	 UPSTREAM		 OWN OPERATIONS	 DOWNSTREAM	
	Sourcing	Manufacturing & assembly; Construction of leased buildings & assets	Products & services	Customers	End-of-life
 Governance	<ul style="list-style-type: none"> ● Management of suppliers ● Corruption & bribery* 	<ul style="list-style-type: none"> ● Management of suppliers ● Corruption & bribery* 	<ul style="list-style-type: none"> ● Corporate culture ● Corruption & bribery* 		
 Social	<ul style="list-style-type: none"> ● Working conditions & other work-related rights ● Equal treatment & opportunities 	<ul style="list-style-type: none"> ● Working conditions & other work-related rights ● Equal treatment & opportunities 	<ul style="list-style-type: none"> ● Working conditions & other work-related rights ● Equal treatment & opportunities 		<ul style="list-style-type: none"> ● Working conditions & other work-related rights ● Equal treatment & opportunities
 Environmental	<ul style="list-style-type: none"> ● Climate change ● Resource use & circularity 	<ul style="list-style-type: none"> ● Climate change ● Resource use & circularity 	<ul style="list-style-type: none"> ● Climate change ● Resource use & circularity 	<ul style="list-style-type: none"> ● Climate change ● Resource use & circularity 	<ul style="list-style-type: none"> ● Climate change ● Resource use & circularity

*Not material from a financial perspective.

INNOVATION & IMPACT

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OUR SOLUTIONS & THEIR IMPACT

Digital infrastructure has the potential to play an invaluable role in enabling the transition to a low-carbon economy.

Through innovation in our products and services, we help customers reduce complexity and improve efficiency while maintaining the performance, resilience and security their businesses rely on.

Our secure, resilient and scalable solutions can also support customers' sustainability performance by enabling more efficient network architectures and more agile operations. This helps reduce duplication, simplify estates and inform smarter decisions about capacity and usage.

- **Shared infrastructure and efficient design:** Using shared network services can help customers avoid the additional infrastructure associated with multiple bespoke networks,

while still meeting requirements for performance, resilience and security.

- **Virtualisation and consolidation:** Edge virtualisation (such as uCPE and vCPE) can reduce the need for multiple physical appliances, supporting simpler deployments, upgrades (for example, security and routing) without repeated hardware changes, and lifecycle management.
- **On-demand consumption and automation:** Software-driven services, including Network as a Service (NaaS) approaches, can support more responsive capacity management and may reduce overprovisioning, depending on customer configuration and usage.
- **Visibility and control:** Service insight, monitoring and analytics can help customers understand performance and utilisation and identify opportunities to improve efficiency; where appropriate, AI-enabled automation can support more proactive operations.

- **Lower-impact services over time:** Our continued work to modernise and decarbonise our network infrastructure can improve the efficiency of the services our customers consume, while supporting the reliability and capacity needed for digital transformation. Key elements of this ongoing discipline include upgrading to newer, more energy-efficient platforms to increase capacity while reducing energy per bit delivered, removing legacy (more energy-intensive) equipment and optimising capacity across the network.

Customer outcomes vary by use case and depend on network design choices and operational practices. We continue to strengthen the foundations for efficiency through product development and ongoing network improvements, with further detail on our environmental performance set out in the ['Climate and Circularity'](#) chapter.

NETWORK AS A SERVICE (NaaS)



We lead the industry in Network as a Service (NaaS). Our on-demand, cloud-based model lets customers remotely provision and manage services on shared infrastructure instead of maintaining their own. This can help boost utilisation, improve agility and support customers' ambition to reduce their environmental impact by enabling:

- Energy use through shared platforms that consume less power than isolated customer networks
- E-waste reduction, as fewer hardware refresh cycles mean less disposal of outdated equipment

- Lower carbon intensity, which ensures better energy proportionality matches consumption to actual workload, reducing emissions across our network and the services built on it

Our platform now connects 30 countries across Europe, Asia and North America, giving businesses the flexible, automated digital infrastructure they need without the footprint of traditional, hardware-centric models.



AI AMBITION MEETS REAL-WORLD DELIVERY

AI is moving rapidly from experimentation to enterprise-wide adoption, driving new demands on digital infrastructure such as higher bandwidth, lower latency, stronger security and increased compute needs alongside heightened expectations around ethics, regulatory compliance and energy efficiency.

As a digital infrastructure provider, we sit at the point where AI ambition meets real-world delivery. We translate AI-driven requirements into resilient connectivity and service experiences that help customers deploy AI-enabled applications with confidence. This means designing solutions that are high-performing, secure and scalable while remaining simple to consume.

We also recognise that AI must be deployed responsibly. That means using appropriate

governance and controls, protecting customer data and keeping people in the loop on critical processes that require human judgement and accountability. In parallel, we consider the environmental impact of AI itself by favouring fit-for-purpose solutions and avoiding unnecessary compute. This perspective is reflected in our whitepaper, *Supporting AI in the UK: a Whitepaper to Government*, co-authored by our CEO and EY, which describes steps to help accelerate AI as a growth driver while addressing the sustainability and security risks of the AI infrastructure needed to support it. You can read the whitepaper [here](#).

See our Responsible AI principles on [page 75](#).

2025 COLT PRODUCT HIGHLIGHTS & LAUNCHES

WE TRIALLED

Smart Path, a new NaaS feature that will let customers choose their network routes in near real time. It gives users more control over sovereignty, security and compliance, while surfacing the incremental carbon impact of each route to support sustainability goals. Expecting to launch in 2026, Smart Path is designed to make secure, flexible digital infrastructure simpler to access and easier to optimise.

WE COMPLETED

a pioneering trial to test quantum-secured encryption across our optical wave network. Building on the successful trial, we are developing tailored solutions to help global businesses prepare for a quantum-secure future and protect their critical data against next-generation threats. For more information, see the Integrated Quantum Networks Hub case study on [page 20](#).

WE LAUNCHED

Managed LEO+, a service integrating Low Earth Orbit (LEO) satellite connectivity with 4G/5G to extend high performance network access to remote and hard-to-reach locations. Available across 65+ countries, LEO+ complements Colt's fibre network with rapid deployment, fully managed connectivity, giving customers a reliable backup option for production sites, manufacturing facilities and rural operations underserved by traditional networks.

WE RELAUNCHED

our cross-functional Sustainability Forum to embed sustainability by design across our products and operations. The forum's purpose is to ensure ESG requirements raised by customers are clearly understood and addressed, while enabling teams to align roadmaps, share best practices and integrate sustainability considerations from feature design to launch.

CARBON EMISSIONS ESTIMATIONS FOR SELECTED PRODUCTS



Colt aims to calculate the carbon footprint of the services we procure in a robust and comprehensive way, considering their full lifecycle impacts, and we are already taking steps to achieve this.

In 2025, we started this journey introducing a carbon emissions calculator for Colt Ethernet Line and Colt Wave pricing tools. Built on our internal assessment methodology, the calculator focuses on estimating carbon emissions associated with

end-to-end devices and network electricity consumption (Scope 2 and Scope 3 emissions associated to energy consumed in third party colocations).

Our long-term goal is to help customers make more informed decisions and create a new feedback loop inside Colt. As usage grows, the insights we gather will help steer future service design, including opportunities to

reduce the carbon intensity of network routes and equipment.

To ensure rigour, the methodology was independently reviewed by an external expert advisor. This resulted in recommendations to strengthen the approach for full GHG Protocol alignment and progress toward a fuller lifecycle assessment (Product Carbon Footprint) for these or other Colt's products and services.



COLT DCS FUTURE-PROOF DATA CENTRE DESIGN

Our Global Reference Design (GRD) framework outlines how we build and operate the next generation of Colt DCS data centres.

It guides every decision, from carbon management and material choices to energy efficiency and biodiversity, so our sites are resilient, future ready and designed with sustainability from the start. All new data centres follow GRD requirements, including our aim to achieve LEED, BREEAM or equivalent building certifications.

To give customers deeper visibility and control, we deliver real-time operational insights

through the Central Telemetry Platform (CTP). Developed with Protiviti and powered by Microsoft technologies, CTP brings together data from Colt DCS facilities worldwide and presents it in a way customers can act on. **The platform provides:**

- Thousands of data points from Colt-operated sites globally, delivered in a standard format
- Near real-time telemetry for power usage, temperature, power usage effectiveness (PUE) and alerts
- API-ready data updated every minute
- Clear visual dashboards to support trend analysis, anomaly detection and SLA validation

COLT'S 2025 INNOVATION AWARDS

We were awarded across the industry for our role in NaaS leadership, network modernisation and sustainable digital infrastructure.

SEVEN MEF NaaS EXCELLENCE AWARDS,

recognising our contribution to the global NaaS ecosystem through innovation, collaboration and leadership, alongside advances in automation.

THE INNOVATION AWARD AT THE LCL DATA CENTRES CARRIER PARTNERS AWARDS 2025,

for delivering innovative, customer-focused solutions that push technological boundaries and set new industry standards.

GARTNER'S EYE ON INNOVATION AWARD 2025,

recognised for our work "Reshaping for the Quantum Era, engineered for terabit scale AI demands." Our submission showcased major breakthroughs including quantum-safe optical trials, industry-first transponder trials and the adoption of 400G and 800G ZR+ optics that expanded our network's capacity to meet future AI-driven demand.

THE VISION AWARD AT THE ADTRAN UK FIBRE AWARDS 2025

for our pioneering work in quantum-safe networking, demonstrating strong technical leadership in shaping the UK fibre landscape.

ADVANCING SUSTAINABILITY THROUGH TECHNOLOGY & COLLABORATION

Colt is working with leading technology partners to build digital infrastructure that is smarter and more efficient. Across buildings, edge platforms and network modernisation, these collaborations help us boost performance and bring next generation services closer to our customers.

01.

Our Smart Building programme with Nuuka, which uses AI-driven HVAC optimisation and real-time indoor air quality sensing to reduce electricity use and improve indoor comfort. In 2025, Phase 1 of the pilot deployed at Colt House reduced fan power consumption by 42% and heating power by 4%, delivering an estimated 6.5 tCO₂e reduction per year, with additional gains targeted in Phase 2.

02.

Street Edge, developed with CIN, Intel® and NodeWeaver, has grown into a scalable, cloud-native edge platform. With telecom-grade enclosures and Colt fibre at its core, it supports real-time analytics, smart-city services and 5G/AI workloads deployed closer to the point of data generation.

03.

Working with Cisco, we simplified our backbone using Routed Optical Networking, Silicon One hardware and automated assurance tools. This resulted in up to 97% energy savings in parts of the network and a more than thirty-five-fold increase in 400G capacity. This work earned Colt recognition as a Sustainability Changemaker finalist at the Cisco Customer Achievement Awards EMEA 2026.

04.

We expanded transatlantic and terrestrial capacity with Ciena's WaveLogic 6e, resulting in higher throughput by ~20% per fibre while reducing space, power and carbon by ~50% versus prior generation transponders. This enables greater support of AI, gaming and streaming growth without proportional energy use.

05.

We are supporting growing AI, gaming and streaming workloads through high capacity, energy efficient optical solutions jointly developed with Ciena. This partnership enables content providers to meet rising digital content demand while improving network efficiency and reducing power per bit delivered.

06.

Our partnership with AtlasEdge in Portugal, pairing a 100% renewable energy powered data centre campus in Lisbon with Colt's low-latency, high-bandwidth network to deliver sustainable, high-performance connectivity for AI, IoT and 5G workloads across priority sectors.



IMPLEMENTATION OF EGDC'S NET CARBON IMPACT METHODOLOGY

Colt is a member of GeSI and work together on the European Union-backed [European Green Digital Coalition](#). EGDC is committed to quantifying the enabling carbon emission-reducing potential of digital solutions, through the deployment of the science-based Net Carbon Impact Methodology. A digital solution is measured to give both the carbon footprint and its carbon handprint (avoided emissions), and assessing its total impact.

In 2025, Colt participated in an EGDC pilot to assess the methodology using our Smart Building proof of concept at Colt House. The pilot applied the methodology to real-world HVAC optimisation data, demonstrating how it can be used to calculate both the carbon footprint and carbon handprint of

digital solutions. Using four months of actual ventilation data extrapolated across the year, the pilot estimated a 10% reduction in electricity consumption and a net carbon impact range of 6.1–12.3 tCO₂e per year.

By contributing telecom and infrastructure expertise into GeSI's EGDC work, we help ensure the methodology reflects real world deployment and can be applied through sector case studies at scale. The result is clearer, evidence-based choices for customers and partners pursuing low carbon digital transformation.

For the next phase of pilots, we have proposed two additional Colt solutions, NaaS and uCPE, to help demonstrate avoided emissions potential across diverse customer environments.



THE INTEGRATED QUANTUM NETWORKS HUB

We joined the UK's Integrated Quantum Networks (IQN) Hub, a £20m+ R&D initiative bringing together academia, government and industry to accelerate quantum secure communications. As part of a collaboration spanning 15 leading universities and national laboratories as well as 50 industry partners, we contribute our expertise in global digital infrastructure and high performance connectivity to help shape the next generation of secure networks.

The rise of fault-tolerant quantum computing will fundamentally change the cybersecurity landscape, making today's

classical encryption methods vulnerable. Through this partnership, we are helping design and demonstrate scalable quantum-secure communications that can be deployed across existing networks at scale. This work strengthens our defence-in-depth strategy and supports our ambition to deliver fully quantum-safe data services across our global platform.

Our involvement in the IQN Hub reflects our commitment to tackling the networking and security challenges of a post quantum future while ensuring our customers stay protected as the threat landscape evolves.



COLT'S 2025 CUSTOMER AWARDS & RECOGNITIONS



Quality Zero Outage Award – Deutsche Telekom: This recognition reflects our dedication to minimising service disruptions through robust incident, problem and change management processes.



Challenger – Gartner® Magic Quadrant™ for Global WAN Services: For the third consecutive year, we were named a Challenger for our ability to execute and the completeness of our vision, reinforcing our position as a trusted provider in global WAN services.



Growth Excellence Award – UK-Portugal Business Awards: This highlights our commitment to delivering resilient, sustainable digital infrastructure and forging long-term partnerships that power innovation and growth.

CUSTOMER EXPERIENCE

Customer input drives how we innovate and shape our products. We measure impact through One Colt, our Group wide NPS metric, which gives a clear view of customer loyalty and how well we are meeting their needs.

The One Colt NPS stood at 54 in 2025, reflecting a broader and more integrated customer base following the inclusion of Lumen EMEA. To improve insight and ensure a more representative picture, we expanded the number and diversity of customers invited into our surveys.

To strengthen customer success, we established a Customer Experience Board to prioritise and act on feedback. We also launched a [customer facing website](#) to share ongoing improvements and keep

customers informed. Alongside this, we stay close to our users through industry events, summits and specialist forums to maintain an open dialogue at the heart of our decision making.

Alongside Group wide improvements, Colt DCS advanced its customer centric approach with a strengthened engagement model, giving every customer a defined path supported by Service Managers and structured, closed loop feedback cycles. Portal enhancements introduced a single hub for raising and tracking health, safety, security and site observations to improve accountability and response speed. Launching the CTP added near real-time telemetry, API access and dashboards to support incident prevention, SLA validation and PUE visibility. Customer first behaviours were further reinforced through new learning modules and Customer Focus Week.

CLIMATE & CIRCULARITY

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OUR CLIMATE COMMITMENTS

As demand for digital connectivity continues to grow, we recognise the responsibility that comes with our environmental impact and are committed to reducing our carbon footprint in line with our approved Science Based Targets (SBTs).

During the year, we advanced this commitment by enhancing Colt Group's decarbonisation roadmap to achieve our near- and long-term targets, alongside an initial assessment of the associated financial impacts.

Colt Group Science Based Targets

Near-term targets

Scope 1 & 2:

↓ **47%**

absolute reduction by 2030 from 2019 baseline (1.5°C aligned)

Scope 3:

↓ **28%**

absolute reduction by 2030 from a 2019 baseline (well-below 2°C)

Net-zero target

Scope 1, 2 & 3:

↓ **90%**

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

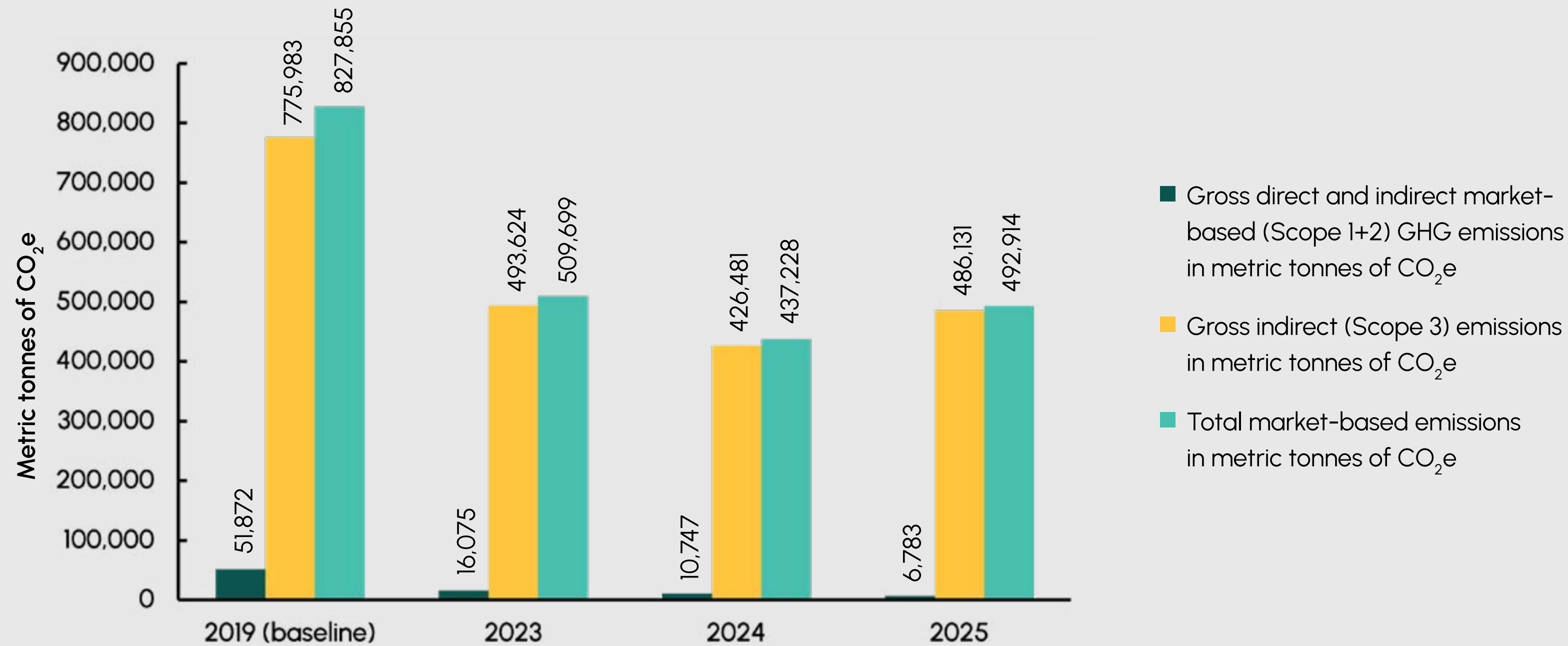
"We are proud of our progress towards advancing our climate targets,

but we recognise there is still significant work ahead to achieve net-zero emissions by 2045. Reaching this ambition will require sustained focus, disciplined investment and close collaboration across our value chain. We are taking the practical steps needed today to deliver meaningful, long-term emissions reductions."



Caroline Griffin Pain,
Chief Legal Officer,
Colt Technology Services

Total Scope 1, 2 and 3 market-based GHG emissions (2019 Baseline, 2023-2025) (tCO₂e)*



We've achieved a 40% reduction of total Scope 1, 2 and 3 market-based GHG emissions against our 2019 baseline as of 2025.

*a. Scope 3 and total emissions reported in graph: 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 account for the divestment of eight Lumen EMEA data centres at the end of 2025 as well as the correction of the inflation rate applied within the rebaseline exercise done in 2024 due to Lumen EMEA acquisition and improved data quality.

Categories 1 and 2 of Scope 3 were restated due to an update on spend-based emission factors. We have moved from EEIO emission factors provided by the Carbon Trust to CEDA emission factors to improve geographical specificity.

c. 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 gases calculation methodology](#).

Since 2019, we've achieved:

↓ **40%**

reduction in total GHG emissions (market-based)

↓ **87%**

reduction in Scope 1 and Scope 2 (market-based)

↓ **37%**

reduction in Scope 3

Total GHG market-based emissions across Scope 1, 2 and 3 saw an increase of 13% from 2024 to 2025, reflecting higher activity across our value chain. The rise is mainly linked to Scope 3 emissions, particularly those associated with increased spend in upstream categories such as Colt DCS capital investment and Colt's engagement with Other Licensed Operators (OLO). A more detailed explanation of these drivers is provided in the Scope 3 emissions section on [page 38](#).



ARCTIC ARTS PROJECT

Colt's three-year partnership with the Arctic Arts Project supports a shared mission: helping people understand the real impacts of climate change and inspiring action. As a Polar Partner, our funding helps enable expeditions that document climate change in some of the world's most vulnerable regions.

In 2025, we activated this collaboration through a dedicated employee experience that paired expert insights with hands-on volunteering and personal "One More Thing" pledges, building stronger climate awareness across Colt and encouraging sustained, practical everyday action.

ENVIRONMENTAL ENGAGEMENT

Across our company, we are united by a shared focus on environmental stewardship, driven by the everyday actions that help reduce our impact and strengthen the communities where we work and live.

Green Teams empower employees to lead on the environmental issues that matter most to them, from reducing waste to restoring biodiversity, creating meaningful impact in their communities. In 2025, these teams expanded their efforts across regions through new volunteering activities, awareness campaigns and practical improvements in our offices.

Examples from across our regions include:

- **Switzerland:** Reduced office emissions by upgrading lighting, recycled more than 1 tonne of materials and joined the national Bike to Work programme

- **China:** Delivered ESG learning sessions, ran World Environment Day activities and donated 38 refurbished laptops to a local school
- **Austria:** Hosted Zero Waste and waste segregation workshops to build everyday sustainable habits



- **Denmark:** Participated in a canal clean-up for the second consecutive year, where employees had the opportunity to participate in litter picking across the canal area near the Copenhagen office



- **Japan:** Colt DCS undertook several community-focused initiatives through environmental clean-ups, including site maintenance in Keihanna with engagement from the neighbourhood, litter picking walk from Roppongi Izumi Garden office to Shiba Park, which provided the opportunity for employees to help improve public spaces

- **Spain:** Organised a visit to a wastewater treatment plant, where employees learned more about Barcelona's wastewater cycle and the final destination of treated water. Additionally, employees participated in an in-person session "Introduction to the World of Beekeeping" to learn about different types of bees, their role and the honey production process



- **Singapore:** Supported biodiversity through horticulture volunteering at Gardens by the Bay



OUR PATH TO NET-ZERO

In 2025, we strengthened our net-zero strategy by integrating Lumen EMEA activities and reviewing our decarbonisation roadmap, ensuring we remain on track to deliver our net-zero ambition.





This work included identifying the strategic actions (“levers”) expected to drive the most significant reductions in greenhouse gas emissions across our operations and value chain. Our analysis highlighted key decarbonisation levers, each assessed through a high level financial review and a marginal abatement cost analysis to evaluate their cost effectiveness.

These levers were modelled across different emissions reduction scenarios to understand their potential impact over time. This approach provided significantly greater granularity than the




previous analysis, enabling more accurate forecasting of future emissions and more effective tracking of progress against our reduction targets.

In addition to the modelled levers, further initiatives, such as fleet decarbonisation and circular economy and waste management, play an important role in delivering Colt Group's net-zero ambition. To support effective implementation, a governance framework is being developed that will define roles, responsibilities, decision-making processes and accountability across key functions.

Decarbonisation levers

Focus Area	Scope Impacted	Commitment/Target	2025 Progress
 <p>Transition to Low-Carbon Fuels and Refrigerants</p>	Scope 1	Transition to more sustainable fuels in new sites and to replace the diesel Electrical Power Generators (once these reach their end-of life) with HVO compatible generators	Deployment of five HVO100-compliant Electrical Power Generators, with 10 more scheduled in 2026
		Upgrade EOL refrigeration systems to use low-GWP refrigerants	New 450 kW chiller at the Nanterre Node (Paris), replacing a previous refrigerant system operating with R134a which now uses R513a, an F-Gas with a significantly lower Global Warming Potential (around 50% less)
 <p>Decarbonise the In-House Fleet</p>	Scope 2 and Scope 3	Achieve a 75% pure electric fleet by 2030 Interim target of 38% by 2025 (defined prior to the acquisition of Lumen EMEA)	Intermediate target of 38% by 2025 was achieved by the end of 2024 considering the Colt fleet (excl. Lumen EMEA) and Colt DCS In 2025, 31% of Colt's (incl. Lumen EMEA) owned fleet were battery electric vehicles and 51% were hybrid electric vehicles
 <p>Reduce Electricity Consumption</p>		Reduce Scope 2 electricity consumption in Colt technical sites and offices Deliver energy savings from synergies and optimisation projects at colocation sites (Scope 2 & 3)	25% Scope 2 reduction in electricity consumption compared to 2024, representing approx. 62 GWh – mainly driven by energy efficiency practices within Colt's network and Colt DCS's data centres, grid decarbonisation and improved accuracy of sub-metered electricity data (resulting in a reallocation of electricity consumption between Colt DCS Scope 2 and Scope 3 Downstream Leased Assets) 23 GWh estimated reduction in electricity consumption from Colt Network efficiency and modernisation projects
 <p>Renewable Energy Procurement</p>	Scope 2 and Scope 3	Achieve 100% renewable electricity procurement for all Scope 2 electricity by acquiring Renewable Energy Certificates (RECs) for all sites globally by 2030	95% of the Scope 2 electricity Colt procured at sites globally is renewable using RECs
		Influence suppliers to increase renewable coverage in colocation sites	Completed assessment of top colocation suppliers to support engagement in 2026

Decarbonisation levers (continued)

Focus Area	Scope Impacted	Commitment/Target	2025 Progress
 <p>Reduce Indirect Emissions from Business Travel</p>	Scope 3	Reduce indirect emissions by finding alternatives to travel and encouraging colleagues to choose better travel options for the environment	Increased the internal carbon price of €13 to €37 per tonne of CO ₂ e to further encourage cutting of unnecessary journeys and to reinvest the funds in verified high quality carbon removal credits representing the removal of 306 tonnes of CO ₂
 <p>Supplier Engagement</p>		Engaging with our suppliers that represent 70% of our supply chain emissions for them to set or commit to setting Science Based Targets by 2030	Revised target to align with evolving market landscape and latest SBTi guidance 64% of Colt's Scope 3 emissions linked to suppliers that have already set a SBT, committed to setting a SBT or signed a Sustainability Schedule
 <p>Circular Economy and Waste</p>		Reduce waste and embrace circular economy principles	Enhancement of Colt Circular Economy Strategy. Conducted initial gap assessment and benchmarking analysis 10 Colt DCS sites progressed towards TRUE Zero Waste Certification 41,683 items of network and IT equipment reused Collaboration with Urban Miners resulted in 290 tonnes of recycled material, 754 tonnes of CO ₂ savings, and over 2,480 tonnes of savings in virgin materials

A CLOSER LOOK AT OUR EMISSIONS

We strengthened our emissions data and reporting in 2025 to better reflect changes in our business and to support robust tracking against our climate ambitions. Key data and methodology enhancements included:

- Rebaselining Colt Group emissions in line with GHG Protocol recommendations following the divestment of eight European data centres
- Transitioning Scope 3 spend-based calculations to CEDA emission factors to improve geographical specificity
- Onboarding a carbon accounting tool to streamline emissions data collection and increase automation

At year end, our total Scope 1, 2 and 3 market-based emissions were 492,914 metric tonnes of CO₂e, with Scope 3 emissions representing the majority of Colt Group's total carbon footprint (approximately 99% of market-based emissions in 2025).

Our total market-based GHG emissions have decreased by 40% from our 2019 baseline year.

Colt Group GHG emissions in metric tonnes CO₂e

Category	2019 (baseline)	2023	2024	2025	Variation against 2019 (baseline)	Variation against 2024
Gross direct (Scope 1) GHG emissions	6,658	4,303	3,806	3,148	-53%	-17%
Gross market-based indirect (Scope 2) GHG emissions	45,214	11,772	6,941	3,635	-92%	-48%
Gross direct and indirect market-based (Scope 1+2) GHG emissions	51,872	16,075	10,747	6,783	-87%	-37%
Gross indirect (Scope 3) emissions	775,983	493,624	426,481	486,131	-37%	14%
Total emissions	827,855	509,699	437,228	492,914	-40%	13%

*a. Scope 3 and total emissions reported in graph; 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 account for the divestment of eight Lumen EMEA data centres at the end of 2025 as well as the correction of the inflation rate applied within the rebaseline exercise done in 2024 due to Lumen EMEA acquisition and improved data quality. Categories 1 and 2 of Scope 3 were restated due to an update on spend-based emission factors. We have moved from EEIO emission factors provided by the Carbon Trust to CEDA emission factors to improve geographical specificity.

c. 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](#).

Compared with 2024, the increase in total emissions was primarily driven by the following factors:

- Growth-related increases in Scope 3 Category 2 (capital goods) linked to capital investment in new Colt DCS data centre infrastructure
- Increased Purchased goods and services spend from Other Licence Operators (OLO) services purchased by Colt

At the same time, Scope 1 and 2 emissions showed clear improvements. Scope 1 emissions decreased by 17%, while Scope 2 market-based emissions fell

by 48%. The reduction in Scope 2 emissions was driven by the following factors:

- A significant increase in renewable energy coverage across our electricity consumption
- The continued implementation of energy efficiency measures across the Colt network
- Improved data quality following the correction of double counting at some UK sites supplied with renewable power, ensuring a more accurate representation of electricity-related emissions

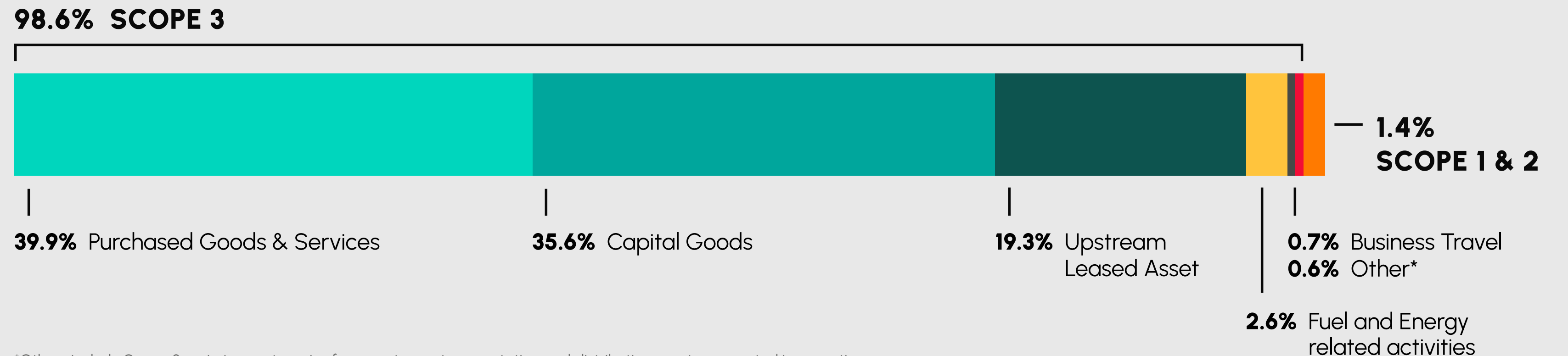
When compared with the 2019 base year, total market-based emissions show a downward

trend, with an overall absolute reduction of 40% across Scope 1, 2 and 3. This positive trajectory reflects the combined impact of energy efficiency initiatives, improved data quality and the ongoing optimisation of operational processes across the company.

The ongoing expansion of Colt DCS operations, driven by the construction of new data centres represents a challenge in our Scope 3 emission progress. Further details on this and actions planned by Colt DCS to mitigate this impact, are provided in the Scope 3 section (page 38).

Colt Group's 2025 GHG emissions calculations have been verified following the ISO 14064-3 standard.

2025 Colt Group GHG emissions breakdown by category (%)



*Others include Scope 3 emissions categories from upstream transportation and distribution, waste generated in operations, employee commuting and Downstream Leased Assets (DLA)

SCOPE 1 & 2 GHG EMISSIONS

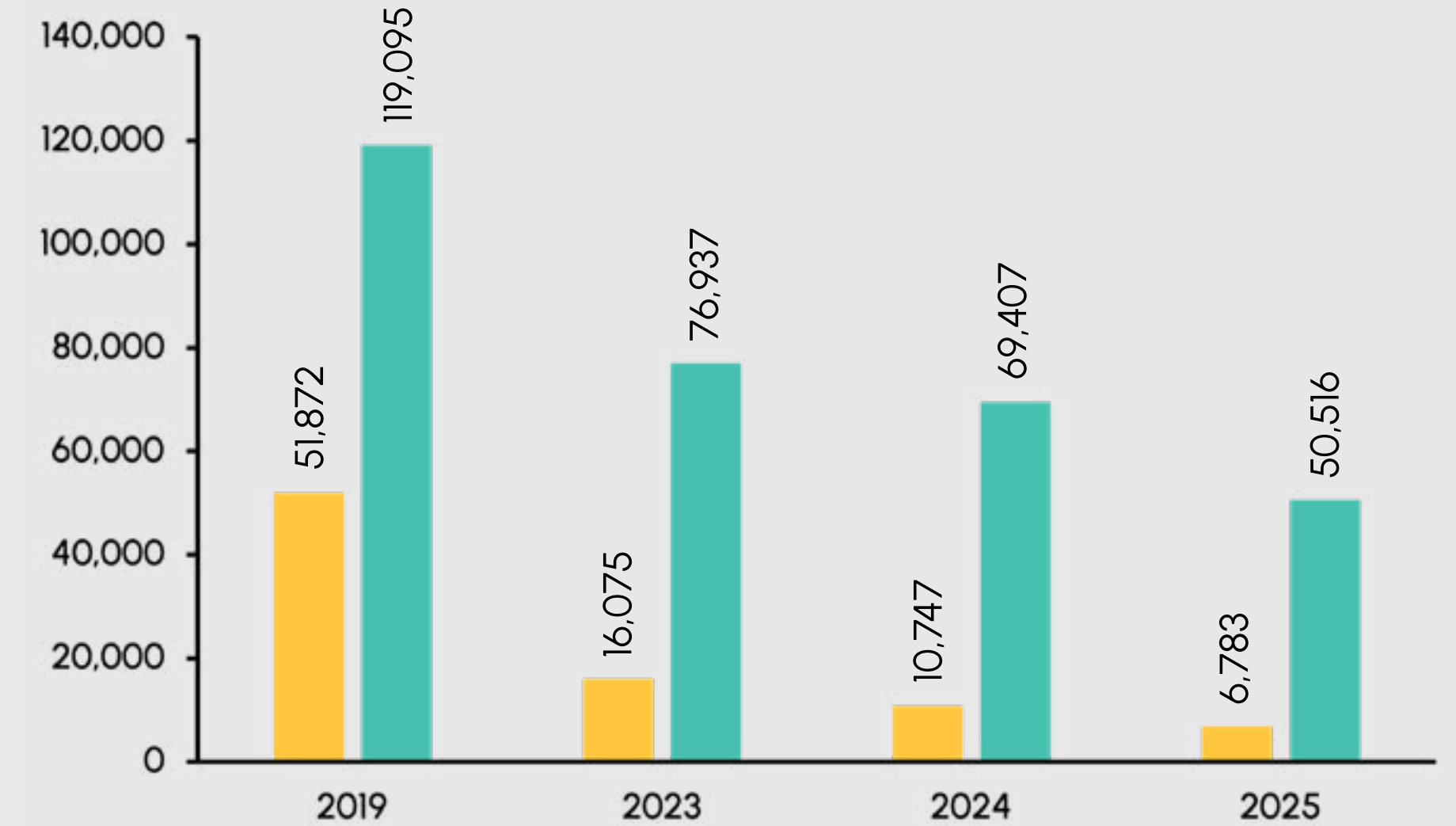
Colt Group's Scope 1 and 2 GHG emissions (market-based) totalled 6,783 tCO₂e in 2025, representing an 87% reduction against our 2019 baseline year and a 37% decrease compared with 2024.

The reduction relative to 2019 is primarily driven by the expansion of renewable electricity procurement, including REC purchases that significantly lowered reported Scope 2 emissions.

Colt Group's Scope 1 & 2 total market-based emissions have decreased by 37% against 2024.

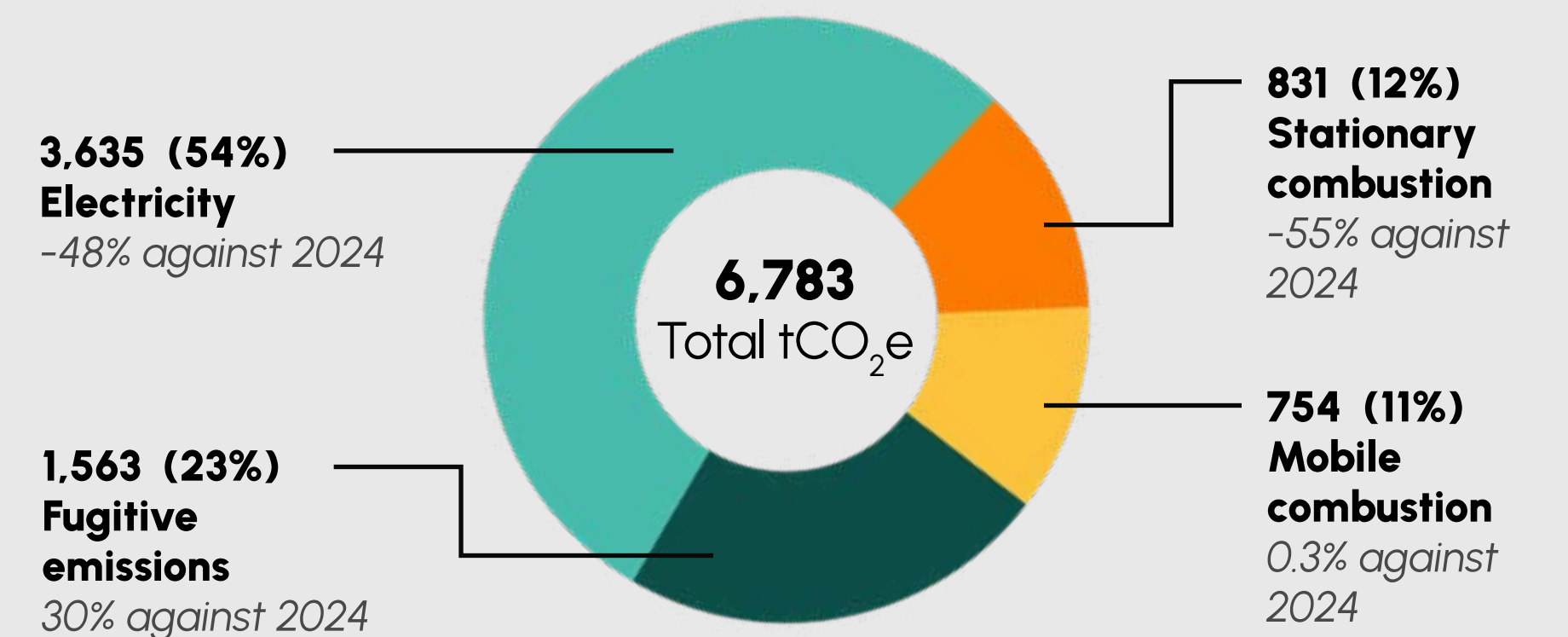
Colt Group Scope 1 and Scope 2 GHG emissions (market-based vs location-based tCO₂e)*

- Colt Group Scope 1 and Scope 2 GHG emissions (market-based tCO₂e)
- Colt Group Scope 1 and Scope 2 GHG emissions (location-based tCO₂e)



*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.

Colt Group 2025 Scope 1 and Scope 2 GHG emission categories (market-based, tCO₂e)



Scope 1 and Scope 2 GHG emissions (continued)

Colt Group's Scope 1 and Scope 2 (market-based) emissions have decreased by 87% against our 2019 baseline year.

This overall reduction reflects continued progress across both Scope 1 and Scope 2 emissions. Scope 1 emissions are comparatively smaller and arise from fuel consumption in backup generators and fleet vehicles, as well as refrigerant leakages. In 2025, Scope 1 emissions decreased by 53% compared with 2019 and by 17% compared with 2024, reflecting reduced use of emergency generators across different Colt Group sites. Fuel consumption at our sites can fluctuate year-on-year depending on emergency generator use and may increase significantly in response to major incidents, such as the 2025 blackout in Spain; for this reason, transitioning to more sustainable fuels remains an important lever to reducing Colt Group's carbon footprint.

We also recorded lower natural gas consumption following the exit from a site in Italy and improved energy management at our headquarters through the Smart Building Proof of Concept (please,

refer to [page 19](#)). In contrast, refrigerant-related emissions increased in 2025, mainly due to full refrigerant discharge during certain cooling-unit replacements, as well as leaks or top-ups during routine maintenance of ageing assets.

Scope 2 market-based emissions continued to decline significantly, falling by 92% compared with the 2019 baseline year and by 48% compared with 2024, despite increased operational demand. This reduction was driven by:

- The continued expansion of renewable electricity procurement coverage across our network and sites. From 2024 to 2025 the renewable coverage increased by 2%.
- Improved data accuracy and calculation methodologies. In particular, Colt DCS saw a 41% reduction in Scope 2 energy consumption compared to 2024, driven primarily by the reallocation of energy consumption to the Scope 3 Downstream Leased Assets category (customer consumption within Colt DCS data centres) and improved data accuracy, alongside grid decarbonisation and targeted energy-efficiency initiatives.
- Ongoing energy-efficiency initiatives across technical infrastructure and offices which led to an overall reduction in energy consumption by 25% compared to 2024.



COLT DCS LOWER-CARBON DATA CENTRE INFRASTRUCTURE

Across our portfolio, new developments apply Global Reference Design (GRD) principles to reduce embodied carbon, improve cooling efficiency, expand renewable energy use and support local communities. Recent examples include:

- **Paris 2 (France)**, where 40 MW of AI-ready capacity is powered by 100% renewable electricity by acquiring RECs, featuring low-embodied-carbon construction, zero-water-waste hybrid cooling, waste-heat recovery, and 1,975 m² of rooftop solar. Phased completion runs to 2029.
- **Inzai 4 (Japan)**, where 4.8 MW of initial capacity (scaling to 20 MW) applies, low-embodied-carbon materials, low-GWP cooling chillers, liquid-cooling-ready systems and water-efficient cooling, with landscaped green areas enhancing local biodiversity.
- **London 4 (UK)**, where 31 MW of first phase capacity uses a low-carbon GRD design powered by 100% renewable electricity and supported by low-GWP cooling, HVO-fuelled generators, rainwater harvesting, and green/brown roofs that boost biodiversity. Colt DCS received the Environmental Excellence Company of the Year Award at the 2025 Hillingdon Business Awards for its roadmap to net-zero by 2045 and the new Hayes data centre's low-carbon design features.
- **Frankfurt 3 (Germany)** is a Tier III, three storey data centre, delivering up to 32 MW of IT capacity to support high performance computing workloads. Designed in line with Colt DCS's GRD, the facility will operate on 100% renewable electricity, use low GWP refrigerants, low water cooling systems, incorporate low carbon materials, and has achieved LEED pre certification.

Electricity Consumption

To support the transition to renewable electricity, we have set a target to source 100% renewable Scope 2 electricity globally by 2030 through renewable energy certificates.

This commitment is a key part of our current decarbonisation roadmap and supports progress against our SBTs. As recognised standards and guidance for market-based accounting evolve, we will continue to strengthen our energy strategy by assessing additional instruments, alongside RECs, to ensure our approach remains robust and aligned with best practice.

In 2025, 95% of the Scope 2 electricity procured across our sites globally was renewable using renewable energy certificates.

We procure renewable electricity primarily through country-specific market-based instruments (such as RECs and GOs) and we also operate on-site renewable generation in selected locations such as Romania and the Netherlands.

We focus on resilience and energy efficiency in our technical sites, improving PUE and reducing power demand through modernisation and operational improvements.

Sustainability is embedded in network architecture, technology choices and day-to-day engineering practices. Our focus is on "decarbonising growth": delivering increased capacity and performance with lower energy consumption, while progressively retiring legacy platforms and supporting circularity through the recovery and redeployment of equipment.

The Global Reference Design (GRD) provides a consistent framework for scaling Colt DCS capacity while driving energy efficiency through improved cooling design, reduced power consumption and stronger energy performance across the estate. In practice, this includes measures such as zero-water-waste hybrid cooling and waste-heat recovery (e.g., Paris 2), low-GWP cooling chillers and liquid-cooling-ready systems (i.e., Inzai 4), and HVO-fuelled generators and low-GWP cooling (i.e., London 4).

KEY ELEMENTS OF NETWORK OPTIMISATION & MODERNISATION AT COLT



Energy efficient technology adoption:

upgrading to newer, more energy-efficient platforms to increase capacity while reducing energy consumed per bit delivered.



Network automation and NaaS enablement:

progressing towards more automated, software driven networking to support efficient operations and on-demand service models.



Legacy removal and estate simplification:

retiring end-of-life platforms to reduce operational energy demand and accelerate decarbonisation.



Capacity expansion through optimisation:

integrating and optimising capacity to deliver more with less equipment and energy.



Asset recovery and reuse:

de-installing idle equipment and redeploying it across the estate, reducing power consumption and avoiding the need for new equipment.

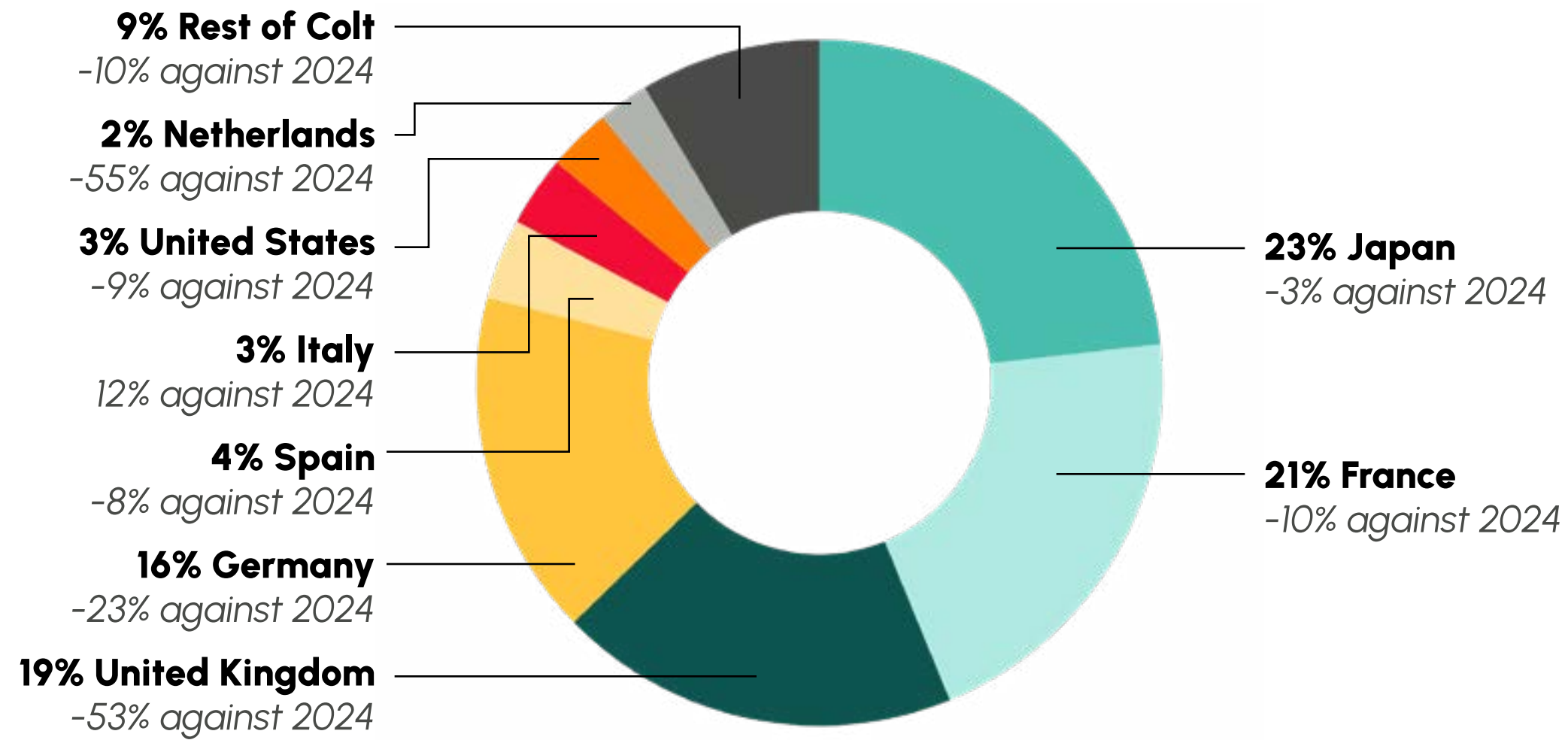


Electricity Consumption (continued)

In 2025, Colt Group's global Scope 2 electricity consumption totalled 184,662 MWh, showing a 25% decrease from 2024. This is mainly driven by energy efficiency practices within Colt's network and Colt DCS's data centres, grid decarbonisation and improved accuracy of sub-metered electricity data (resulting in a reallocation of electricity consumption between Colt DCS Scope 2 and Scope 3 Downstream Leased Assets).

Japan is the largest contributor to total Scope 2 electricity consumption (23%), with a modest 3% decrease compared to 2024. Germany also showed a reduction compared to 2024, driven by equipment replacement. In the United Kingdom and the Netherlands, reductions were supported by efficiency measures and equipment replacement; however, the most significant driver was the reallocation of electricity consumption between Scope 2 and Scope 3 from Colt DCS operations. Italy showed an increase in 2025 due to improved data quality.

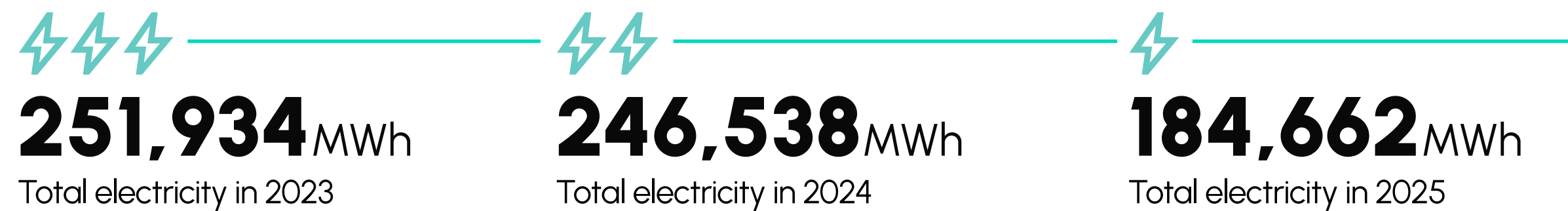
Share of electricity consumption by country³



³Includes electricity consumption from electric vehicle charging both in office and outside as well as all energy consumption pertaining to Scope 2, including district heating and cooling kWh consumption; Does not include electricity consumption accounted for in Scope 3.

"Rest of Colt Group" includes: Austria, Belgium, Bulgaria, China, Denmark, Greece, Hong Kong, India, Ireland, Norway, Poland, Portugal, Romania, Singapore, Sweden, Switzerland and Turkey.

Scope 2 electricity consumption trend 2023-2025 (MWh)⁴



⁴2025 data includes electricity consumption from electric vehicle charging both in office and outside. Does not include electricity consumption accounted for in Scope 3.



ENERGY REDUCTION THROUGH DECOMMISSIONING

Colt continues to prioritise energy efficiency across our European operations, with a series of targeted equipment decommissioning and upgrade projects currently underway.

In 2025, we continued the decommissioning of Synchronous Digital Hierarchy (SDH) legacy equipment from Lumen EMEA and completed the network transition across several European sites. The programme began in 2023, with approximately 95% of devices removed during 2023 and 2024, resulting in an estimated saving of 1.4 GWh per year. Along with the completion in 2024 of Time Division Multiplexing (TDM) networks in Europe, this represents an estimated reduction of 15 GWh per year.

Additionally, in 2025 Colt undertook an important project in the UK to increase

security and resilience by migrating all our clients' circuits from a specific third-party platform. The project will be completed in 2026 and is expected to bring total estimated net savings of 3.8 MWh per year. It is estimated that during 2025, around 15% of the calculated savings will have taken effect, with the remaining energy consumption savings to be realised next year.

Beyond providing energy efficiency gains, these projects are all managed in accordance with Colt's Investment Recovery procedure, which aims to extend the lifespan of network equipment and recover raw materials. In 2025, this procedure was enhanced through closer collaboration with relevant internal teams and recovery partners, driving greater efficiency and consistency.



ELECTRIFICATION OF VEHICLE FLEET

We are committed to achieving a 75% pure electric fleet by 2030. We're pleased to share that we are on track for this goal, having achieved our interim target to have a 38% pure electric fleet by the end of 2025. Progress noted considers the Colt and Colt DCS fleet, excluding the Lumen EMEA fleet.

When including the Lumen EMEA fleet, we ended 2025 with 31% battery electric vehicles (BEVs) and 51% hybrid electric vehicles (HEVs). Specifically, out of our 380 active cars, 117 were BEVs and 196 were HEVs.

Looking ahead, we will continue progressing towards our 2030 target. We plan to phase out internal combustion vehicles over time and will assess the most appropriate transition scenarios in line with the availability of EV charging infrastructure in each country where we operate.

In 2025, including Lumen EMEA data, we reached a total of 52 charging stations and 89 ports across our sites. Additionally, at Colt DCS we have installed 31 EV charging points at six data centres across five countries.

51%

HEVs across
Colt Group

31%

BEVs across
Colt Group

75%

target for pure
electric fleet by 2030



PUE IMPROVEMENTS IN COLT TECHNICAL SITES

In 2025, we replaced an end-of-life chiller at our Nanterre (Paris) network node with a new high-efficiency system, as part of ongoing efforts to modernise infrastructure and improve energy performance across our technical sites.

Following commissioning in October 2025, monthly power data was used to assess performance. The upgrade delivered an approximately 6.5% year-on-year improvement in PUE, demonstrating the impact of targeted equipment upgrades on site energy efficiency.

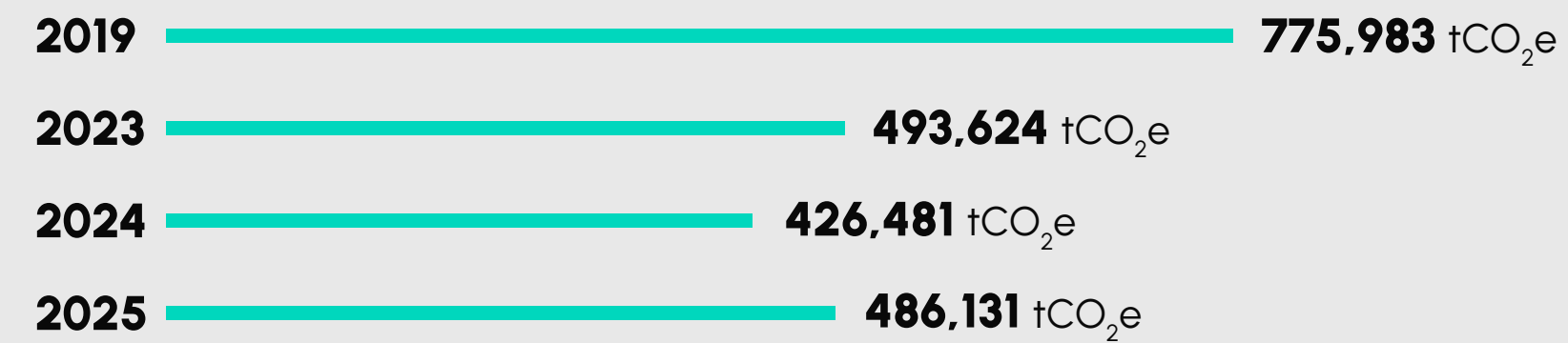
SCOPE 3 GHG EMISSIONS

The majority of Colt's emissions occur within our indirect operations, remaining a critical area of focus.

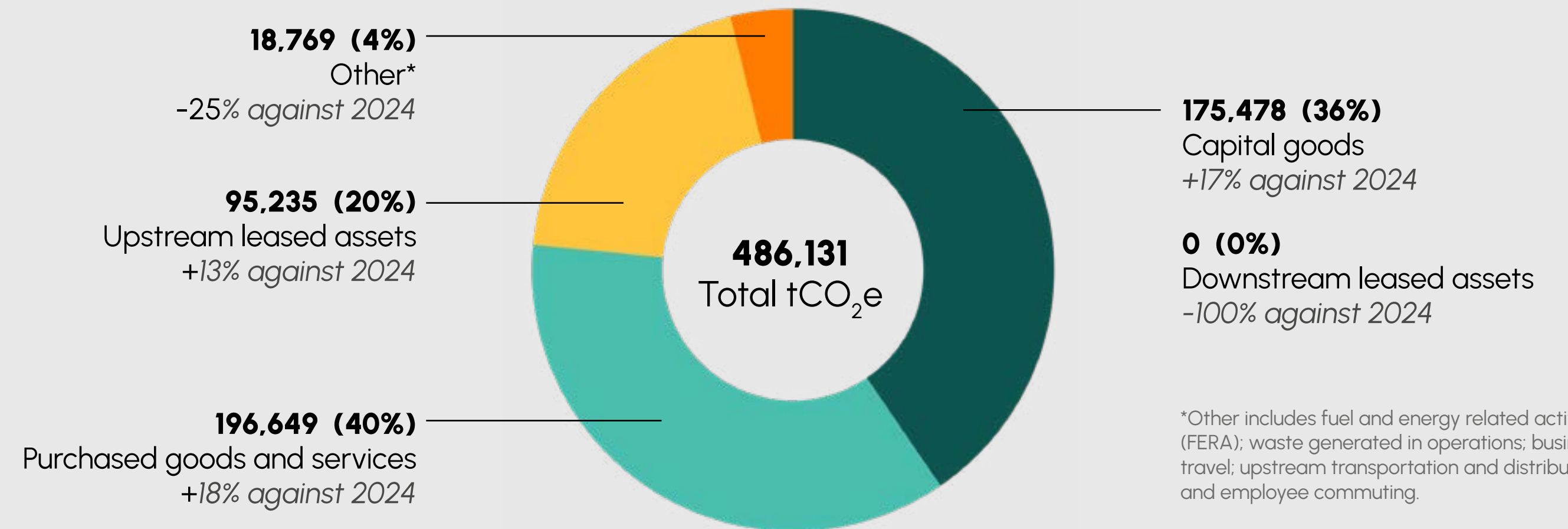
In 2025, Scope 3 comprised 99% of our total footprint, primarily driven by purchased goods and services, capital goods and electricity consumption associated with upstream leased assets.



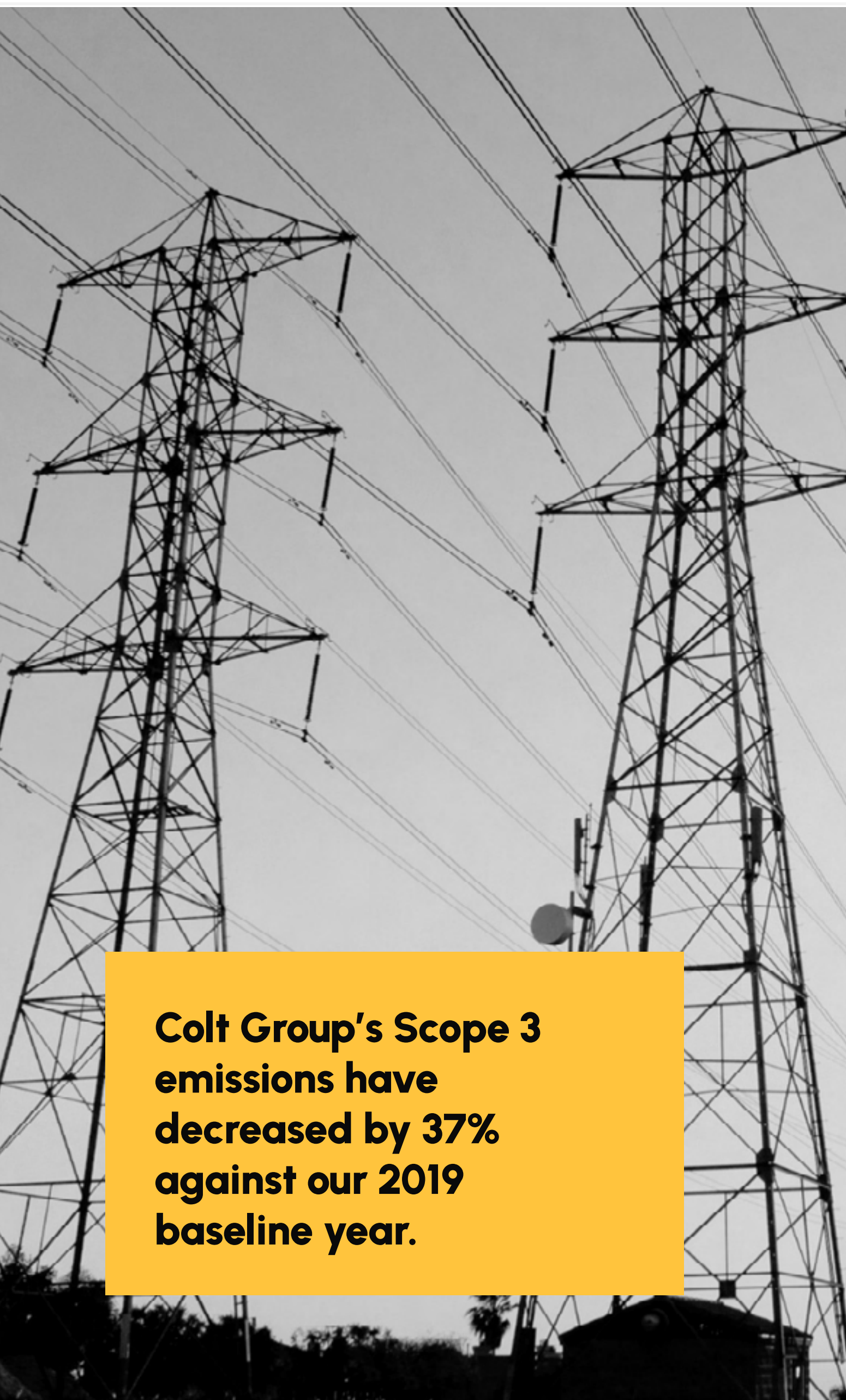
Colt Group Scope 3 GHG emissions (tCO₂e)



Colt Group 2025 Scope 3 GHG emission categories (tCO₂e)



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



Colt Group's Scope 3 emissions have decreased by 37% against our 2019 baseline year.

Addressing Scope 3 emissions requires action across the full value chain, and we take a multi-pronged approach that includes:

- The Colt Sustainable Supply Chain Program, with a focus on engaging suppliers to reduce upstream impacts
- Embedding lifecycle thinking and circularity into our operations
- Optimising our network in third-party colocation sites to reduce energy use
- Targeted efforts to reduce emissions associated to logistics and business travel

When compared with 2024, Scope 3 emissions increased by 14% in 2025 mainly driven by:

- Higher capital investment associated with new Colt DCS data centre developments, including the opening of a new facility in Japan and continued construction activity in Frankfurt and Berlin
- Increased purchased goods and services spend from Other Licence Operators (OLO) services purchased by Colt

To better understand and address emissions linked to capital goods, Colt DCS is developing a more structured approach to identifying carbon emission hotspots across the full lifecycle of its assets using Whole Life Carbon Assessments (WLCA). These assessments, conducted at both design and as built stages support informed decision-making that balances operational and embodied carbon, particularly by influencing early material choices to reduce upfront embodied emissions. This approach supports improved Scope 3 capital goods reporting and ongoing refinement of the GRD in line with decarbonisation objectives.

During the year, we also initiated a mapping of preferred OLO providers across European countries, including an assessment of suppliers' climate maturity, to identify partners aligned with Colt's business and decarbonisation objectives. Alongside this, we will increase the use of supplier-specific emission factors to better reflect decarbonisation progress in Colt's carbon footprint.

In 2025, emissions associated with Downstream Leased Assets (DLA) were accounted as zero using the market-based methodology. This reflects the expansion of renewable energy procurement through RECs covering electricity consumption in the United States

Colt recorded a 15% reduction in energy consumption compared to 2024, related to the energy consumption in third party colocation sites largely due to the decommissioning of legacy equipment and power intensive products. We are strengthening our engagement with colocation providers to confirm their renewable electricity coverage and obtain the supporting evidence needed to improve the accuracy of Colt's Scope 3 calculations.

Business travel accounted for 0.7% of Colt Group emissions in 2025. Where travel is required, we encourage employees to choose lower-emission options in line with Colt Global Travel Policy. Our business travel booking portal also displays estimated emissions and highlights lower-emission options as an additional parameter to support decision making. Alongside these efforts, our internal carbon pricing mechanism helps account for the impact of business travel and supports investment in high quality carbon removal solutions.

INTERNAL CARBON TAX FUNDS CARBON REMOVAL PROJECTS

In 2022, Colt introduced an internal carbon tax on business travel, applying a cost to each tonne of CO₂e emitted from business trips and charging it to the relevant functional budget. This encourages employees to consider lower-carbon travel options when planning business trips.

This year we increased the internal carbon tax from €13 to €37 per tonne of CO₂e, reflecting the rising cost of high-quality carbon removals. Revenue generated through this initiative is reinvested in carbon removal projects and sustainability partnerships. Projects include:

- **Klimate:** In 2025, Colt purchased verified (Carbon Standards International - Global C-Sink) high quality carbon removal credits through Klimate, representing the removal of 306 tonnes of CO₂ through two biochar projects (these 306 tonnes were retired during the reporting period, see details [here](#)). Biochar is produced by heating organic materials in a low oxygen environment and can store carbon for long periods when applied to soil. Projects supported include:
 - **Carbo Kollerup (Germany):** Converts waste wood from landscape conservation into biochar applied to local agricultural fields.

- **Carboneers (Odisha and Assam, India):** Trains smallhold farmers to convert agricultural waste into biochar, improving soil fertility while generating additional income through carbon credits.
- **Carbon Kapture:** Colt also supports Carbon Kapture, a company developing circular ecology projects through seaweed cultivation and biochar production. Since 2022, Colt has supported their main project in Mulroy Bay, Ireland, where native seaweed is cultivated, converted into biochar and distributed to local farmers to improve soil health. The Carbon Kapture project has developed into a broader research ecosystem, collaborating with University of Graz, University College London and Bournemouth University, and participating in EU-funded initiatives exploring biodiversity monitoring and scalable seaweed-based carbon removal pathways.

All projects undergo scientific due diligence and quality assessment prior to inclusion in Colt's carbon removal portfolio.



Supplier engagement & collaboration for decarbonisation

We actively engage with our suppliers to drive collective impact and decarbonise across our value chain.

In 2025, we updated our supplier engagement target to better reflect current supplier readiness, sector-specific dynamics, significant growth in our supply chain in recent years and the evolution of relevant standards. Previously, Colt Group aimed to address 93% of supply chain emissions to set SBTs by 2025; the revised target now focuses on suppliers representing 70% of supply chain emissions to set or commit to setting SBTs by 2030.

At the end of 2025, 64% of Colt Group supply chain emissions were from suppliers that have set SBTi approved targets or aligned targets or have signed the Colt Sustainability Schedule. Through the Sustainability Schedule, we ask suppliers to develop and implement a decarbonisation plan and to set their own science-based targets for Scope 1 and 2 emissions aligned with limiting global temperature rise to 1.5°C within two years.

Supporting our suppliers on their decarbonisation journey remains a priority. In 2025, we developed a climate change guidance itinerary enabling suppliers to self-assess their maturity in climate change practices and commitments and access tailored support. We aim to publish it via Colt's Vendor Portal in 2026.

To support progress towards our SBTs, we are improving Scope 3 data quality from our suppliers by increasing supplier-specific



primary data, reducing reliance on spend-based estimates, and better reflecting suppliers' decarbonisation efforts in our calculations.

In 2025, we also joined the CDP Supply Chain membership, which enabled us to engage with our top 200 suppliers and request carbon footprint data. Through this process, we integrated supplier specific data from 18 suppliers, whose information met quality criteria including carbon footprint verification and geographical accuracy. We will continue to expand this coverage over time as supplier data availability increases and our engagement model matures, strengthening transparency and our understanding of value chain emissions.

2025 SUPPLY CHAIN ENGAGEMENT PERFORMANCE

53%

Colt Group suppliers with an approved SBT (by % of emissions)

9%

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

2%

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

64%

of our supply chain emissions are with suppliers that have already set a SBT, committed to setting a SBT or signed a Sustainability Schedule

CIRCULARITY AND WASTE

We aim to apply circular economy principles, including reducing waste generation, to minimise the environmental impacts across our operations and value chain.

This approach aligns with our Environmental, Waste and Zero Waste to Landfill policies. In 2025, we laid the foundations for enhancing our circular economy strategy by reviewing our processes and completing a gap assessment against key circular economy regulations and management standards, including EU Eco-design Directive, WEEE Directive, Packaging & Packaging Waste Regulation, ISO 59004 Circular Economy Framework and ISO 59010 Circular Business Models, among others. This work has been then informed by engagement across relevant functions. The resulting Circularity Framework Action Plan will be finalised and approved in 2026.

A central part of our approach is managing how equipment is procured, used and recovered across its lifecycle. By extending the lifespan of our

network and IT equipment, we reduce demand for new materials and cut the embedded emissions associated with manufacturing and replacement. Within procurement and supply chain processes, we focus on keeping equipment in use for longer by promoting internal re-use, repair processes and procurement of refurbished or second-hand equipment.

Embedding circularity at end of life is supported by Colt's Investment Recovery (IR) Procedure, which defines how network and IT equipment is managed when it reaches end of life. The procedure aims to ensure equipment is treated in an environmentally and financially responsible way by extending its lifecycle where possible, creating value for the business, and ensuring safe and considerate disposal.

Through the IR Procedure, we work with a network of established asset recovery and urban mining partners to support redeployment, resale or recovery of valuable materials. These activities are enabled by coordinated processes across Procurement, Network Engineering, Supply Chain and IT, improving equipment collection, reuse and asset tracking.

IN 2025*

€3.55 million
spent on 3,896 units of second-hand equipment

Extended the life of

41,683
pieces of equipment via internal reuse

Collaboration with TXO (Ellen MacArthur Foundation community member):

Resold 577 pieces of network equipment that resulted in estimated CO₂ savings of

123,766 kgs**
and over €180,000 revenue

Partnership with R.Pierre in Italy:

We refurbished 413 Accedian network devices resulting in over

16,122 kgs
of CO₂ savings*** as part of our collaboration in Southern European region

Collaboration with SIMS:

Reused and recycled

2,356 kgs
of network equipment with an average 96% of recovered materials

*There was a 15% decrease in number of reused equipment and 29% decrease in purchased second-hand equipment due to business challenges.

**Estimation based on TXO's Carbon Calculator developed by the Carbon Trust. TXO receives used network equipment, then cleans and/or refurbishes it and sells it on to be re-used. This model provides a toolkit for analysing the emissions of various product categories cleaned/refurbished by TXO and sold on to our customers, and to compare them with the emissions of the same products purchased new.

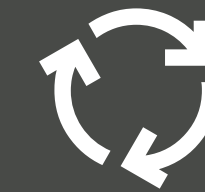
***Estimation based on calculations from R.Pierre's partner: eNextGen – research consultancy Spin off from the Polytechnic University of Milan.



Following the acquisition of Lumen EMEA and its extensive network, the scale of our infrastructure and associated equipment assets increased, further reinforcing the importance of effective IR processes. Throughout 2025, inventory reduction and legacy removal initiatives continued to improve efficiency across the combined inventory.

Colt DCS currently has ten sites working towards TRUE Zero Waste certification, with plans to bring additional locations on board.

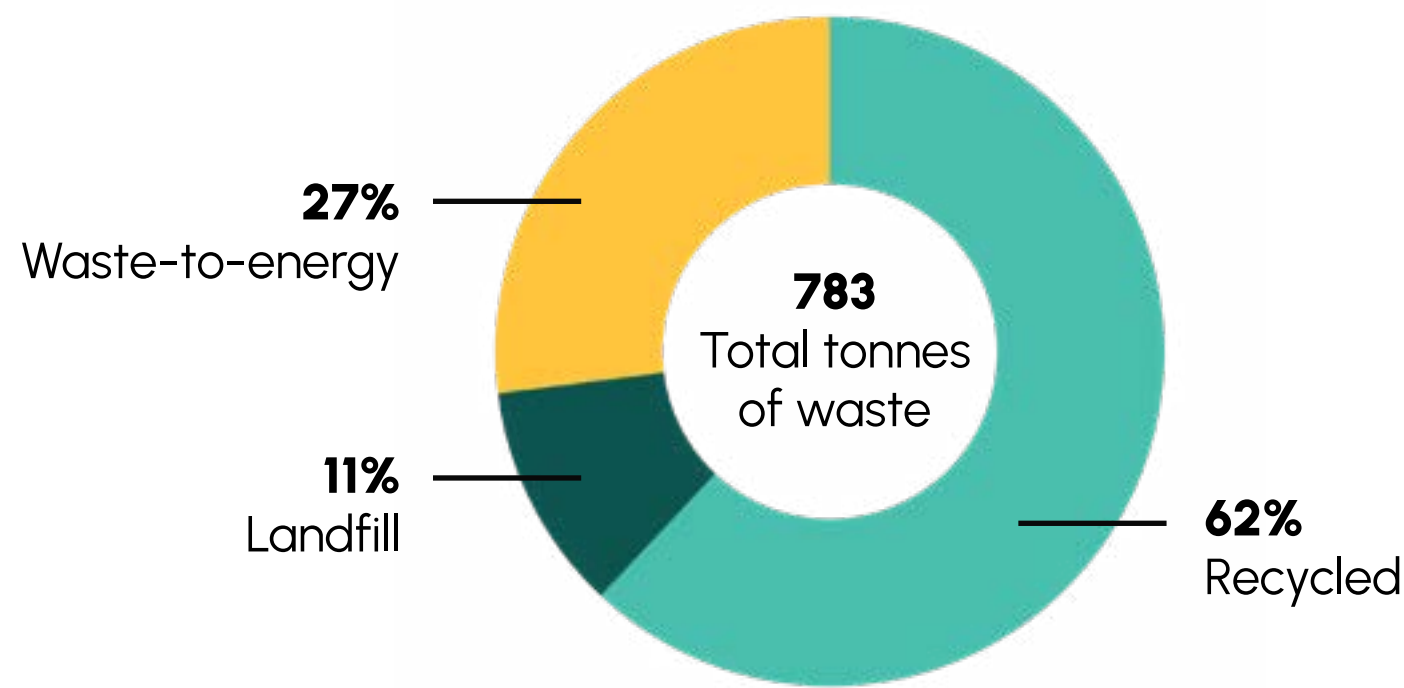
In 2025, Welwyn Garden City achieved TRUE Gold certification, with Osaka Keihanna and Inzai 1-3 receiving TRUE Certified certification. To support this ambition, Colt DCS implemented an internal waste data management system, engaged customers to include customer-related waste data and developed site-specific action plans for each site.



RECOVERY OF VALUABLE MATERIALS FROM OUR NETWORK EQUIPMENT WITH URBAN MINERS

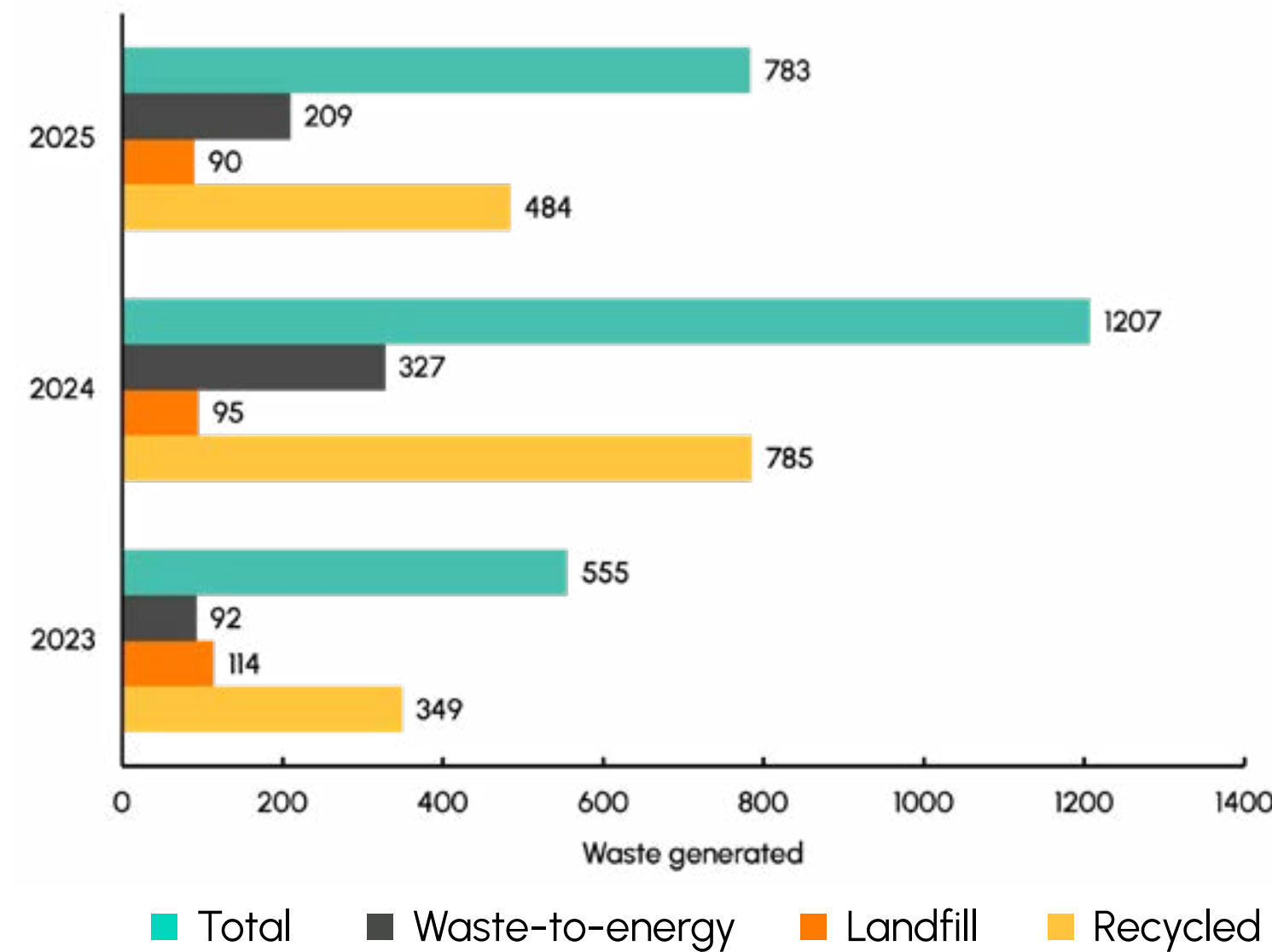
In 2025, we continued our collaboration with Urban Miners within the Investment Recovery procedure in Austria, Belgium, France, Germany, Netherlands, Portugal, Spain, Sweden, Switzerland, and the United Kingdom, resulting in over 290 tonnes of recycled material (with an average recycling rate of 99%), 754 tonnes of CO₂ savings, and over 2,480 tonnes of savings in virgin materials.

2025 Colt Group waste generation by disposal type (tonnes)



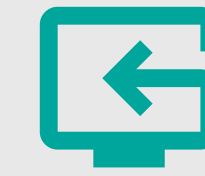
Across the wider Colt Group, total waste volumes reduced by 35% compared to 2024. Of the waste generated, 62% was recycled, 27% was sent to energy recovery and only 11% went to landfill.

Colt Group waste data generation by disposal type (tonnes)



2025 Colt Group waste generation (tonnes)

	Recycled	Waste-to-energy	Landfill
Non-hazardous waste generated	314	208	90
Hazardous waste generated	170	1	0
Total waste generated	484	209	90



REDUCING ELECTRONIC WASTE WITH 2ECOND CHANCE

We partner with 2econd Chance, a UK-based computer recycling charity that provides hands on IT refurbishment training for people with physical disabilities, learning difficulties and social, emotional or mental health needs.

In 2025, we donated over 200 devices for refurbishment. These devices were data-wiped, refurbished, resold at discounted prices to people in-need and donated to local charities, extending their life and reducing electronic waste. 45 individuals received training using Colt donated equipment, completing 300 hours of meaningful, skills-building work. Through this donation, 43 refurbished devices were donated to schools and 2econd Chance generated £19,000 in revenue, all reinvested into the charity's programmes.

Our partnership was recognised externally as well. We were shortlisted for the 2025 Global Connectivity Awards in the Best Sustainability and ESG Initiative category for our joint efforts to cut e-waste and support inclusive, skills-based employment.

PEOPLE & COMMUNITIES

IN THIS SECTION

- 46 Talent, culture and belonging
- 60 Promoting health, safety and wellbeing
- 63 Community impact

TALENT, CULTURE & BELONGING

Our people are at the heart of Colt, and we make sure they feel heard. Our Listening Strategy ensures employee feedback directly informs engagement plans and business decisions.

Throughout 2025, we gathered insights through surveys, forums, focus groups, all hands meetings and Q&A sessions. We also introduced targeted listening where specific teams or locations need extra support. A key part of this approach is our annual People Matters survey, which gives every Colt employee the chance to share their experience.

87% of Colt employees participated

79% engagement score

79% belonging score

83% inclusion score

COLT DCS ACHIEVED GREAT PLACE TO WORK CERTIFICATION

Colt DCS is focused on creating a workplace where people feel valued, supported and able to thrive. In 2025, the organisation achieved Great Place to Work® certification, reflecting strong employee trust, wellbeing and confidence in leadership. Survey results showed high sentiment across safety, fairness and inclusion, underscoring a culture grounded in equity, respect and ethical behaviour.

Colt DCS was also listed across multiple Best Workplaces™ 2025 categories including Development, Wellbeing, Women, Construction and Engineering & Property. These successes reflect the business' sustained investment in learning pathways, inclusive policies, stronger communication and development frameworks that support both personal growth and organisational performance.



BUSINESS CHANGE HUB AND CHANGE CHAMPIONS

We continue to bring our people together under a unified One Colt culture. In a year of rapid change inside our business and across our markets, we focused on giving employees clarity, support and a shared sense of purpose so teams could move fast, together.

The Business Change Hub was established in 2025 to support Colt through a period of significant organisational transformation and to provide a more structured, consistent approach to managing change. As major programmes such as the rebuild and integration initiatives progressed, the Hub helped strengthen visibility of change activity, monitor employee sentiment and provide practical support to teams navigating transition.

A key achievement was the creation of a global network of 72 Change Champions, embedded across the business to act as advocates, share insights and surface feedback from teams. The champions completed formal change management training, strengthening change capability across the organisation. During the year, the network supported colleagues through the rebuild following the cyber incident, including participating in communication pods and piloting the rebuilding of laptops to help refine the process before wider rollout. Champions also provided valuable sentiment insights on key programmes, including integration activity, helping ensure changes were implemented in a way that supported employees and sustained business operations.

WORKFORCE AT-A-GLANCE



In 2025, Colt Group's global workforce decreased by 3% compared with 2024, reflecting the continued implementation of a multi-year structural transformation programme. These changes support operational simplification and the alignment of skills with long-term strategic priorities, strengthening organisational resilience. Throughout this process, Colt remained focused on responsible workforce management, prioritising transparent dialogue and consultation processes, support for affected employees, and continued investment in reskilling and capability development.

Colt Group number of employees by geography⁵

Country	2024	2025	Variation from 2024
France	324	316	-3%
Germany	490	467	-5%
India	1,963	1,966	+0.2%
Japan	336	394	+17%
Spain	600	577	-4%
United Kingdom	1,728	1,376	-20%
Rest of Colt	1,293	1,175	-9%
Total	6,468	6,271	-3%

6,271 employees in 26 countries

98% employees are permanent

33% Colt Group employees are female

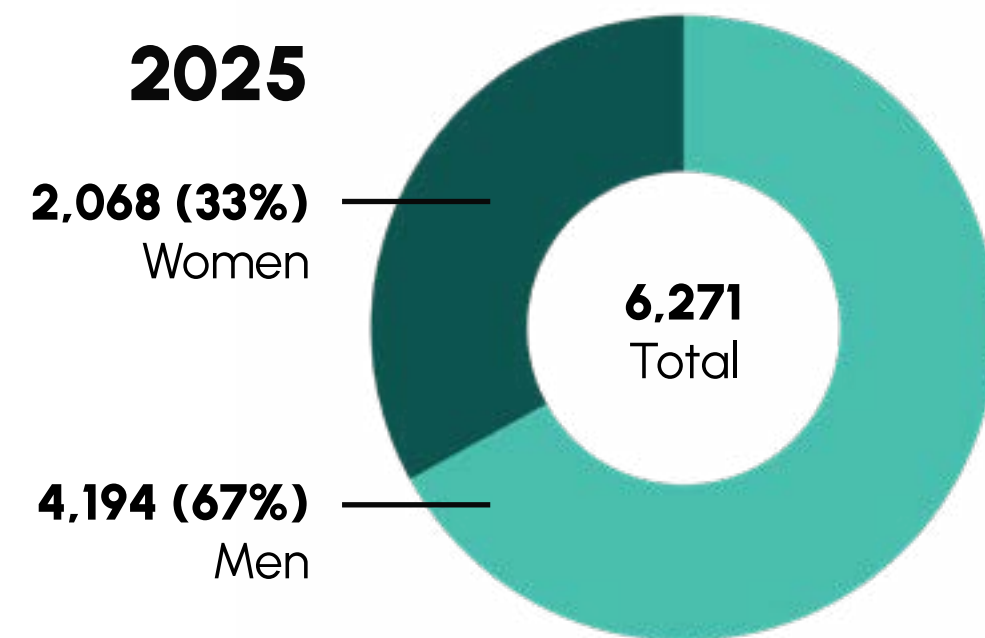
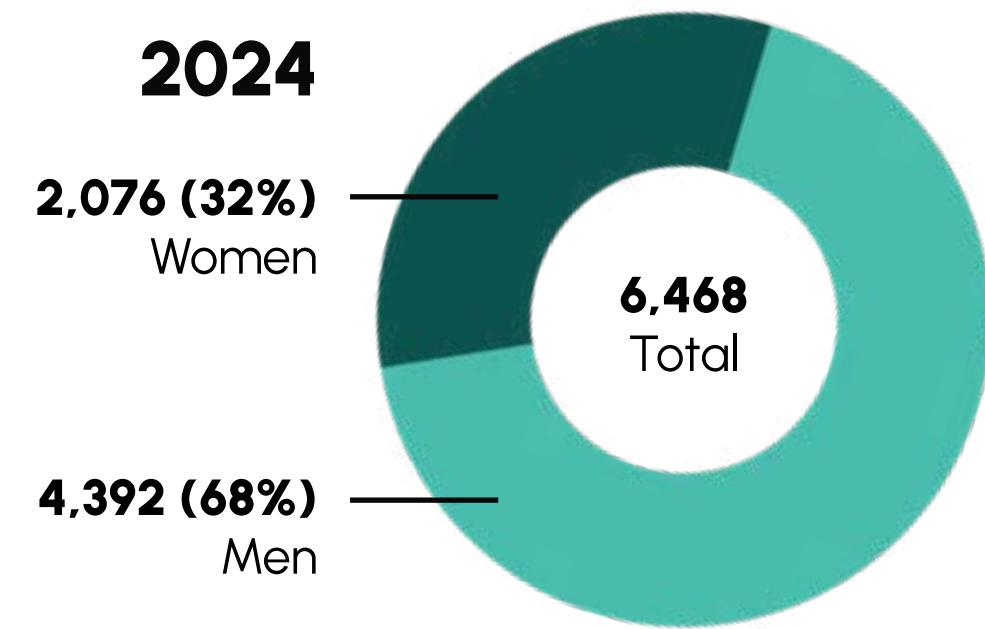
⁵Rest of Colt Group includes: Austria, Belgium, Bulgaria, China, Denmark, Greece, Hong Kong, Ireland, Italy, Luxembourg, Netherlands, Poland, Portugal, Romania, Singapore, Sweden, Switzerland, South Korea, Turkey and the United States.

Headcount is as of December 31, 2025.

2023 and 2024 data includes 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.

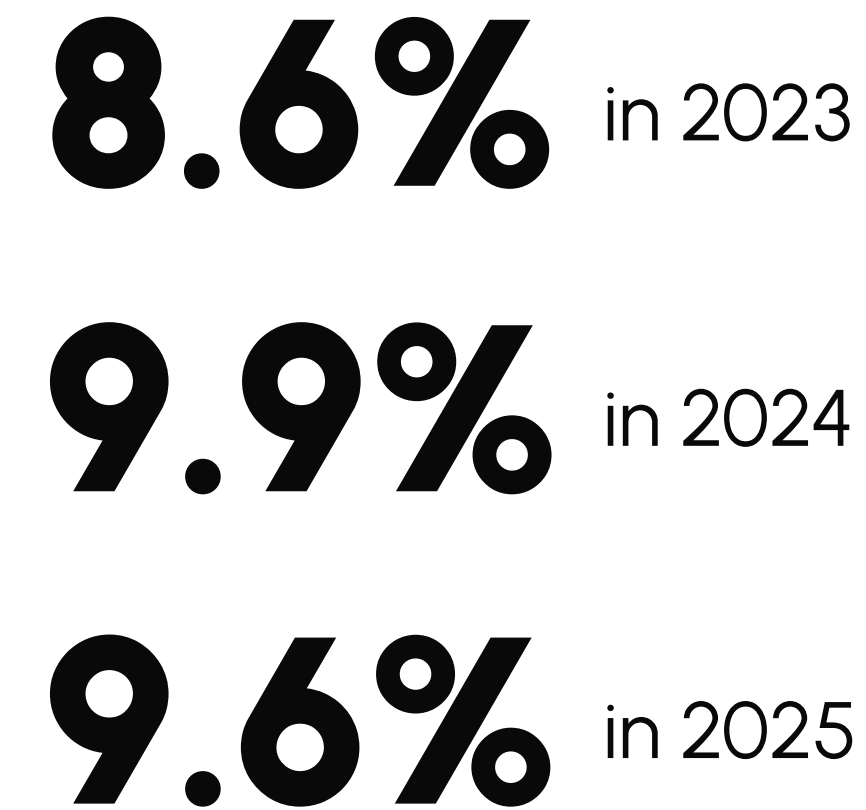
Colt Group employees by gender



Colt Group new hires by gender



Colt Group turnover rate





DIVERSITY, EQUITY AND INCLUSION

Our vision is to empower our people to thrive, adapt to change and deliver innovation for shared success. This is supported by the following focus areas:



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.

Our comprehensive DEI programme is built on these focus areas and spans global initiatives, active communities and structured roadmaps, and **supported by policies and guidelines such as:**

- Global DEI Policy
- Global Wellbeing Policy
- Global Family Leave policy
- Global Transition at Work policy
- Global Workplace Adjustments policy
- Global Domestic Abuse policy
- Menopause Guidelines
- Fertility Support Guidelines
- Neurodiversity Guidelines

We embed inclusion into everyday leadership, apply bias-resistant practices throughout the employee lifecycle and drive progress on gender, accessibility, disability inclusion and neurodiversity. Our governance and listening mechanisms ensure we measure what matters and act where it counts.

Our efforts include:

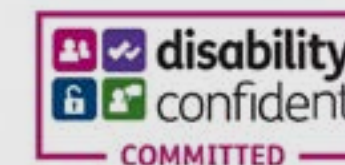
- Maintaining an Inclusion & Wellbeing Calendar, which is a unified, year-round framework of monthly themes, awareness days and network-led moments, with one hub for resources and events

- Providing Inclusion Nudges for Managers and ThriveWell wellbeing resources. These practical tools help teams weave inclusion and wellbeing into everyday decisions
- Launching the Culture & Inclusion Champions in 2025, which is a network of colleagues that work with local leaders to deliver inclusion events, strengthen wellbeing initiatives and serve as in-country points of contact to build belonging at a local level
- Hosting cross-network campaigns, which are local and global activations, such as Connecting Through Inclusion, that bring our networks together
- Embedding Inclusion in Change Management, with tools that support inclusive people-led transformation

In 2025, we joined the Social Mobility Employer Index for the first time, ranking 86th out of 140 entrants. Our inclusive recruitment practices, Ignite Hubs digital inclusion work and data-led early careers outreach strategy were highlighted as key strengths.

We are proud of our progress and continue to reinforce our commitment to building an inclusive, equitable culture through memberships, partnerships and accreditations that align with our values.

MEMBERSHIPS, PARTNERSHIPS AND ACCREDITATIONS





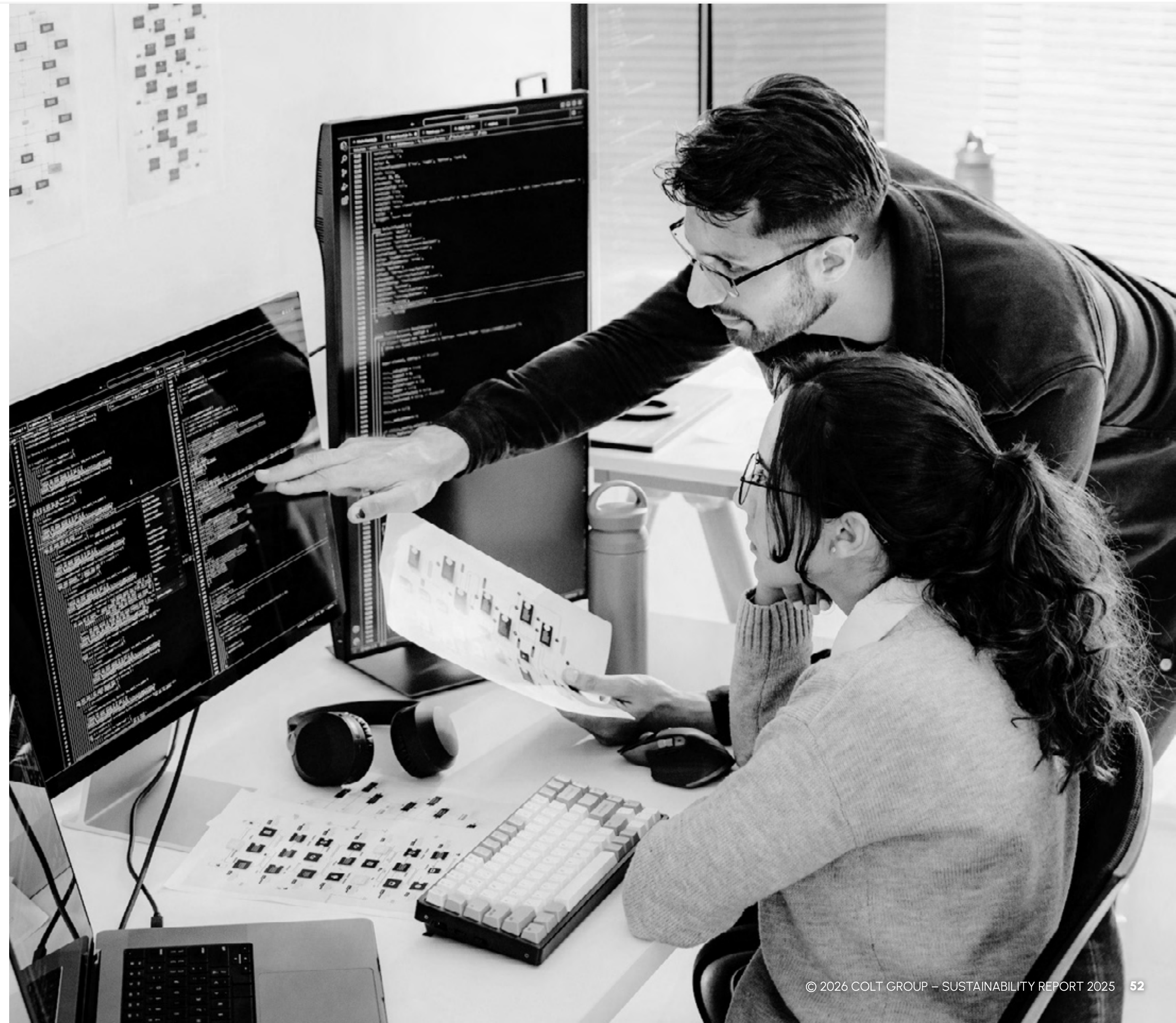
EMBRACING AI WITHOUT LEAVING PEOPLE BEHIND

We published a research-led white paper exploring how telecoms can adopt AI with people at the centre. *How Telcos Can Embrace AI Without Leaving People Behind* looks at how we can pair innovation with fairness, inclusion and practical governance. **Here's what we learned:**

- **23%** of telecoms employees surveyed feel very confident about job security as AI scales
- **55%** worry about AI replacing roles, with higher concern in roles more likely to be held by women; this highlights the need for equity-minded change
- **63%** believe AI can advance gender targets if bias is actively mitigated and diverse employees are consulted from the start

Essentially, this research indicates that AI adoption works best when people-first practices are the standard. This can be done by ensuring open dialogue, role-specific enablement and bias-aware governance are embedded in everyday decisions to increase confidence and responsible use.

To learn more, [download the white paper](#).



GENDER DIVERSITY

We are strengthening our gender diversity pipeline, addressing functional and regional gaps, and increasing accountability for balanced hiring and progression.

Women represented 33% of Colt Group's workforce in the reporting year. With a stronger focus on inclusive hiring and gender-neutral job adverts, 44% of new hires across the Colt Group in 2025 were women.

We are a signatory to the UNGC Women's Empowerment Principles (WEP), and we joined the UNGC Target Gender Accelerator Programme, benchmarking our Gender Action Plan against global best practice through the WEPs Gap Analysis Tool. This gives us a clearer view of where we lead and where we need to go further.

To further promote gender diversity, we delivered a suite of targeted programmes to address representation gaps and strengthen progression pathways for women across the organisation.

Key 2025 actions include:

- **Lean In Circles & Embrace**, which offers mentoring, peer learning and leadership development for 500+ women
- **ThriveWell**, our comprehensive wellbeing offering provides menopause-inclusive support, a fertility toolkit and trained Women's Health Champions
- **Parental Leave Buddy Scheme**, helping ensure a smooth, confident returns to work
- **Women on Boards partnership**, which gives board-readiness training, mentoring and access to NED opportunities
- **Empowered Women in Tech campaign & Women in STEM programming**, which is designed to attract, inspire and develop the next generation of female tech talent
- **Aspire2Tech reskilling**, supports 30+ women to transition into or advance in technical roles

Altogether, these inclusive hiring practices resulted in our "Confident" rating by the Inclusive Hiring accreditation.



44%
of Colt Group's new hires were female.

COLT GENDER TARGETS

Colt has long-term targets to achieve 38% women across all roles and 28% women in senior positions by 2030.

Colt female percentage by job level*

	2024	2025	2030 Target
✓✓ Senior roles	23%	25%	28%
✓ All levels	32%	34%	38%

*Figures do not include Colt DCS employees. When considering both Colt and Colt DCS, women represented 33% of Colt Group's workforce in 2025.



WOMEN'S HEALTH CHAMPIONS AND FERTILITY TOOLKITS

We strengthened our wellbeing ecosystem with dedicated support for women's health. Our Women's Health Champions give colleagues trusted, local points of contact who raise awareness, answer questions and help people access the right support when they need it. They play a crucial role in normalising conversations and ensuring women feel seen, supported and understood.

To complement this, our Fertility Support Toolkits offer clear, practical guidance for anyone navigating fertility treatment or

related challenges. The toolkits include signposting, advice and manager guidance to help reduce stigma and ensure colleagues receive sensitive, consistent support throughout their journey.

Both initiatives sit within ThriveWell, our global wellbeing programme, making women's health support more accessible, more human and part of everyday life at Colt. For more information on this programme, see the Promoting Health, Safety and Wellbeing section.



WOMEN IN STEM

In 2025, we launched the Women in STEM competition to inspire the next generation of female technologists. Women aged 18–24 were invited to write a letter from their future selves, imagining the careers they will build in STEM. Three standout finalists were selected by senior women in tech at Colt to receive mentoring from a Colt leader and £1,000 (or local equivalent) to support their development.

- **Arantxa Fachado Belart** imagines creating the world's first free 7G network with global reach, leading with empathy, purpose and diversity.
- **Dorcas Adetunji** envisions becoming CTO of Africa's largest fintech, shaping AI innovation and empowering inclusive tech communities.
- **Krinjal Jignesh** sees herself developing the Earth Twin Project, a real-time biological simulation, while mentoring young women through the Global Tech Sisters Network.

EMPLOYEE NETWORKS

Our employee networks play a central role in building a diverse, inclusive workplace. They give employees space to connect, lead and grow while ensuring every voice is heard.

- **Women+@Colt:** Supports women and allies, promotes gender balance and helps create an environment where women can thrive
- **Pride Matters:** This LGBTQ+ and Allies network champions belonging for all identities. In 2025, Pride Matters was named LGBTQIA Network of the Year at the DIVA Awards
- **YOUnited:** Focuses on cross-cultural understanding and ensures every employee can flourish regardless of race, ethnicity, faith or cultural background
- **Disability Accessibility Network (DAN):** Raises awareness of visible and invisible disabilities and champions accessibility and inclusion across Colt

- **Next@Colt:** Supports early career colleagues by building networks, developing skills and helping new talent grow

In 2025, 1,100 employees were part of an employee network group. More than 1,200 colleagues participated in over 40 global and local events organised by these network groups.

We also continued Allyship in Action, including a focus on men's mental health, International Men's Day activities, sponsorship of the Masculinity in the Workplace conference, and confidential Brave Spaces and Together Spaces conversations on belonging. Our allyship community facilitated more than 200 small group listening circles and delivered key activities such as "Allyship – the leadership skill you didn't know you needed," alongside a men's mental health webinar with MENable founder Stephen Whitton.



SHARING LIVED EXPERIENCES FOR BLACK HISTORY MONTH

Storytelling is one of the ways Colt brings inclusion to life. By creating space for colleagues to share their lived experiences, we encourage reflection, empathy and deeper understanding, helping people connect with perspectives they may not encounter in their day-to-day work.

This approach came to life during our Black History Month session, Standing Firm in Power and Pride. The facilitated panel focused on personal reflections on identity, heritage and resilience, inviting colleagues

to listen and engage in a respectful and psychologically safe environment. The conversation helped colleagues better understand different viewpoints and consider how identity and heritage can shape our work experiences.

The session was recorded and shared with colleagues globally, extending its impact beyond the live discussion. By elevating real voices, this approach supports learning, allyship and a workplace culture where people feel seen, heard and valued.

ACCESSIBILITY

Our Accessibility Programme is about building accessibility into every part of the Colt experience for our people and our customers. It aligns with our Equitable Business Practices pillar and is guided by our five-year Accessibility Roadmap, which focuses on governance, employee experience, awareness and skills, brand and reputation, and customer experience.

We advanced this roadmap by strengthening both the structural enablers and everyday practices that support disabled and neurodivergent colleagues. **This includes:**

- Introducing global office accessibility and inclusivity standards, improving the workplace adjustments process and launching a cross-business Accessibility SteerCo to provide consistent oversight, escalation routes and accountability.
- Providing more than 230 developers with targeted accessibility training to help reduce digital barriers across internal and customer-facing platforms.
- Delivering the global Everyday Access campaign, offering practical, Microsoft 365-focused "how-to" content, demos and prompts that help teams use built-in accessibility tools and work more inclusively day-to-day.
- Developing an Accessibility Playbook to guide consistent adoption of accessible design across the refreshed Colt.net experience and future digital platforms.
- Embedding accessibility earlier in the product lifecycle, with new processes kicking off in 2025 and full integration planned for 2026.
- Expanding community and advocacy initiatives, such as the Hidden Disabilities Sunflower Scheme, and Colt's participation in industry forums such as the myGwork Disability Inclusion Panel.



NEURODIVERSITY

In 2025, we strengthened support for neurodivergent colleagues through our Neuro Inclusion Programme, building awareness, skills and practical tools that make inclusion part of everyday work. Key initiatives include:

- Equipping people leaders to build neuro-inclusive teams through our Mind Matters workshop series, focused on understanding needs, removing barriers and adjusting work practices. 131 managers completed Mind Matters Neurodiversity Training.
- Launching Inclusion by Design tools, which includes an Inclusion Impact Assessment, enabling change teams to identify potential disproportionate impacts early and build mitigations in from the start. This ensures transformation supports neurodivergent and disabled colleagues rather than leaving them behind.
- Expanding Lean In Circles to provide dedicated peer-learning spaces for neurodivergent colleagues and allies. These circles allow participants to share lived experience, learn what adjustments work in real roles and build confidence through community.
- Hosting a global event for the International Day of Persons with Disabilities with inclusion architect Toby Mildon. The session spotlighted workplace adjustments, intersectionality and practical allyship, helping colleagues better understand how to support one another.

These collective efforts helped improve our wellbeing scores for neurodivergent colleagues by 5% in 2025 vs. 2024, with similar gains across inclusion and belonging.

TRAINING AND PROFESSIONAL DEVELOPMENT

We invest in growing a high performing, diverse workforce by developing skills, confidence and leadership at every level.

Our learning offer blends compliance and technical training with personal development, business skills, leadership pathways, mentoring and early careers learning.

To uphold high ethical and operational standards, **all employees are required to complete mandatory modules covering:**

- Business Continuity
- Data Protection
- Conscious Inclusion
- Action on Environmental Sustainability
- Code of Business Conduct
- Security Awareness
- Prevention of Sexual Harassment in the Workplace (PoSh)
- Brand and Vision
- Health and Safety

Completion rates are disclosed in [the Appendix](#).

We also offer a broad selection of optional learning programmes to help colleagues grow in their roles and careers:

- **UN Global Compact Learning Academy Platform:** Launched in 2025, all employees can access this learning platform, which gives them practical tools for engaging with and embedding ESG principles into their day-to-day work
- **MEDDPICC eLearning (Enterprise Sales):** Introduced in November 2025 to strengthen consultative selling, qualification discipline and a shared coaching language across enterprise sales teams
- **“Ways of Working” Training:** In-person workshops delivered across Europe to support Colt’s new customer success model through building alignment, improving collaboration and clarifying roles and responsibilities

- **Colt Technical Training Academy:** Led by our Technical Training Team, ensures employees are well-trained with the tools we use, enabling them to perform at their best. The training is a prerequisite for major technology and service introductions, ensuring readiness and accelerating time-to-market for Colt and our customers

In addition, we continue to expand access to on-demand learning through:

- **Colt Excel:** Over 1,500 learning assets for customer facing teams
- **LinkedIn Learning:** 4,712 hours completed by 984 employees
- **Percipio:** 2.7k learning hours completed in 2025
- **Globesmart:** 119 additional employees adopted the platform
- **Strategic partner platforms:** Microsoft Enterprise Skills Initiative, Google Cloud Platform AI Upskilling and Cisco learning programmes

6

business critical training programmes

15

new technical modules

786

people trained via instructor led training

652

total training days

€977k

equivalent external training value



STRENGTHENING OUR LEADERSHIP CAPABILITY FOR ONGOING TRANSFORMATION

We strengthened our leadership development strategy with a major investment in new, layered pathways that build capability at every level. These programmes complement our flagship Stepping into Leadership course for new managers and mark a significant step forward in preparing our teams to lead through transformation. The new programs include:

- **Leadership Impact Accelerator**, an eight-week leadership transformation journey for employees showing informal leadership influence
- **Aspire to Lead**, an eight-week development experience that builds self awareness, influence, decision making discipline and core management skills
- **Ascending the Leadership Summit**, an immersive, two-day development experience using a mountain climb framework to strengthen trust, collaboration and applied leadership
- **Leadership engagement sessions**, such as Conversations Unplugged in India, which create space for open dialogue and connection between leaders and their teams

ENGAGEMENT INITIATIVES

- **Colt's Learning at Work Week**: An annual company wide campaign that opens up diverse development opportunities and celebrates ongoing learning across the organisation
- **Colt's Continuous Learning sessions**: 50-minute workshops held each month on communication, feedback, resilience and leading through change. These practical, bitesize sessions are designed for quick uptake and real-world application
- **Colt's Recognising talent (Inspire)**: Our recognition platform, which was revamped in 2025, to make great work more visible and timely. We received an award for effectively helping managers and peers celebrate effort, outcomes and values-led behaviours
- **Addressing attrition among early career women in India**: Listening circles highlighted the need for clearer career paths. Aspire2Tech responds with reskilling and upskilling pathways that support transitions into (and progression within) technical roles, strengthening the pipeline and retention
- **Colt DCS' MyLearningHub**: A skills platform that helps people understand, measure and build capabilities for today and tomorrow, with personalised, at scale learning through AI driven content and skills intelligence. In just 10 months, Colt DCS achieved a 71% active learner rate, surpassing the internal target of 65% by the end of 2025
- **Colt DCS' MentorU**: A mentoring programme matching new joiners with experienced colleagues to accelerate confidence, networks and career clarity

COLT DCS AWARDED BEST TALENT DEVELOPER – DATA CENTRE WORLD 2025

Colt DCS received the 'Best Talent Developer' Award at Data Centre World London 2025, recognising the organisation's structured approach to talent development and skills growth. The judging panel highlighted key initiatives, including the AIM Framework,

MyLearningHub, Management Matters, Mentor U and the AI-enabled learning platform, that together strengthen professional development and support inclusive, skills-based progression across the organisation.



EARLY CAREER PROGRAMME

Colt's Early Careers Programme brings new talent into the business through apprenticeships, graduate schemes and other entry-level roles while equipping them with the skills, networks and confidence to grow. We welcomed 67 individuals into the Early Careers programme, with graduates, apprentices and other career starters joining from eight countries. To accelerate their development, we delivered six targeted workshops covering communication, time management, leadership, resilience, team effectiveness, and change and problem solving, enabling participants to build confidence and contribute quickly to their roles.

The programme was externally recognised, winning the Early Careers Champion Award from the Institute of Telecommunications Professionals (ITP). In addition, several graduates were nominated for individual honours, with two shortlisted.

Colt DCS is cultivating the next generation of data centre professionals through a graduate programme that typically welcomes one to four graduates annually across engineering, operations, finance, legal and real estate development. Apprenticeships offer an additional vocational pathway, opening the door to hands-on learning and long-term careers in digital infrastructure.

LABOUR RELATIONS

Globally, 34% of all 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 formal union representation or an NWC, we provide alternative forums, such as elected employee representatives and Colt Ambassadors, to ensure employees have regular channels for information and consultation.

Our Social Dialogue Statement provides a global framework for how we engage with employee groups. It aligns with Colt's values, our DEI goals, people agenda and ESG strategy, while being grounded in local legislation across all jurisdictions.

The Statement reinforces our commitment to building collaboration, consensus and democratic involvement between the EWC, NWCs and employee representatives. It also affirms our obligation to uphold ILO-defined fundamental human rights, including freedom of association and collective bargaining.

34%

of total employees are covered by collective bargaining agreements

59%

of total employees in the European Union are covered by collective bargaining agreements

PROMOTING HEALTH, SAFETY AND WELLBEING

We are committed to maintaining a comprehensive, ISO 45001 aligned Health & Safety Management System that protects employees, contractors and everyone who works with us.

Our Health & Safety Policy Statement outlines this duty of care, and the Health & Safety SteerCo oversees our Occupational Health & Safety Management System (OHSMS) to ensure consistent standards across the Group.

Throughout the year, we strengthened our approach through several key initiatives:

- **Integrated HSE management systems** by unifying Colt and Lumen EMEA into a single framework, streamlining procedures and governance across the Group. The programme completed in November 2025, with performance impacts to be tracked over the next period.
- **Renewed Railway Industry Supplier Qualification Scheme (RISQS) certification** (UK), allowing continued safe operations on rail infrastructure.
- **Initiated expansion of ISO 45001 certification** from Lumen UK to Colt UK, with preparations finalised at year end and completion expected shortly after.
- **Enhanced compliance measures** by migrating to a new legal-requirements assessment tool, continuing mandatory training aligned with regional rules and hosting occupational health activities (e.g. vaccination campaigns, medical check-ups, etc.) where required.
- **Designed a new Health & Safety Strategy** (2026–2028), with a focus on training, awareness and consistent execution across Colt.
- **Updated global H&S training** and issued to all employees to reinforce safe working practices.



COLT'S LONE WORKING APP

We introduced a global Lone Working App to strengthen personal safety for about 250 colleagues who may work alone in field or site environments. The app connects directly to a 24/7 security centre, which can escalate to emergency services when needed. Built-in features such as fall detection, automated welfare checks and the ability to activate the microphone or cameras help ensure rapid response and greater peace of mind for anyone working independently.



2025 SAFETY BY NUMBERS

100%

of employees covered by a H&S management system⁶

0.13

rate of recordable work-related injuries, predominantly slips and trips (71%)

7

recordable work-related injuries⁷, 100% investigated and corrective action implemented when deemed appropriate

99% & 97%

completion rate of H&S training module for Colt and Colt DCS, respectively

43%

reduction in days lost to work-related injuries compared to 2024

0

work-related fatalities

0

cases of recordable work-related ill health

10,896,657

total hours worked

For a historical outlook of our health and safety data, see [page 94](#).

⁶This includes employees covered by Colt's internal H&S management system, ISO 45001 certified or management systems in accordance with local legal requirements.

⁷Rate calculated based on 200,000 hours.



DRIVER RISK MANAGEMENT

To reduce road related risk, we launched a company-wide approach to safe driving. This includes a new internal licence validity check for employees who drive company vehicles, ensuring compliance and readiness before they get on the

road. We also developed a Safe Driving training module, delivered periodically and mandatory for relevant roles. These measures ensure standardised controls across Colt and embed safe driving behaviours into routine operations.

EMPLOYEE WELLBEING

We prioritise mental health and wellbeing through clear policy, practical guidance and easy to access support. Our Global Mental Health and Wellbeing Policy sets out our commitment to creating an inclusive, supportive environment. Through our Employee Assistance Programme (EAP), employees have confidential, 24/7 access to professional help, resources and information. Our trained Mental Health First Aiders are available to provide support and listen without judgement. We continue to expand everyday tools and learning, so wellbeing becomes part of how we work.

In 2025, we enhanced our wellbeing approach by:

- Hosting mental health events throughout the year, including themed sessions for men's and women's health as part of the Inclusion & Wellbeing Calendar
- Providing four extra wellbeing days to all employees at year-end to support rest and recovery
- Delivering two global "Empowered Through Rest" webinars, focusing on sleep science and practical habits for better energy and focus
- Embedding everyday wellbeing habits through the Everyday Wellbeing: Practical Tips and Mindfulness series with weekly guided sessions from October to December



THRIVEWELL PROGRAMME

We launched ThriveWell, a single, easy-to-navigate hub that brings together mental, physical, emotional and financial wellbeing. The hub gives employees and managers clear access to support services, preventative resources and practical guidance for life's tougher moments. It includes:

- **Personify Health wellbeing app** that rolled out early 2026, providing colleagues an accessible way to track habits, access expert resources and engage in wellbeing challenges.
- **Wellbeing-focused global webinars** on sleep and rest, such as the "A Mindful Approach to Sleep" and "How to Improve Your Sleep."
- **Weekly guided mindfulness series**, that ran from October to December, to support stress management and focus.
- **Dedicated women's health resources**, such as Women's Health Champions, an updated Menopause Hub and Fertility Support guidance alongside on-demand webinars and microguides. For more information, see Women's Health Champions and Fertility Toolkits on [page 54](#).



COMMUNITY IMPACT

Our Global Social Impact Strategy promotes advancing digital inclusion and STEM education in line with our purpose, values and the UN SDGs. We focus on building digital skills for disadvantaged young people and underrepresented groups by partnering with local NGOs, schools and charities to turn access into opportunity.

While digital inclusion, promoting STEM education and responsible tech remain our Strategy's key focus areas, we expand our impact to support local communities through a wide variety of activities and collaboration. This includes working with charities that support vulnerable children, DEI and people with disabilities, environmental sustainability projects, poverty reduction and humanitarian aid. Employees are encouraged to volunteer locally, with two paid volunteering days each year.

COMMUNITY GIVING AND VOLUNTEERISM METRICS

€365,678

donated to charities in 2025

872

days volunteered in 2025



SCHOOLS OUTREACH PROGRAMME



Beyond our Global Social Impact Strategy and CSR initiatives, our Learning and Development Team advanced our UK social mobility and school outreach programme. In 2025, we supported 18 events, both on-site at Colt House and off-site, contributing 170

volunteer hours to schools and colleges in and around London and Basingstoke. Across these activities, our efforts supported 1,000 students throughout the year.

SOCIAL IMPACT STRATEGY ON DIGITAL INCLUSION AND STEM EDUCATION

During the reporting year, we expanded our Global Social Impact Strategy through several partnerships on a global and local scale.

We became a supporting donor partner for the ninth edition of Meet and Code, Europe's largest digital skills programme helping grassroots nonprofits deliver coding and technology activities for people aged 8–24. Through this partnership, Colt funded more than 50 STEM events across Italy, Poland, Romania and Spain, contributing to 380 events delivered across eight European countries and reaching over 15,000 participants. The programme helps make digital skills accessible for those facing the greatest barriers, with 47% of participants coming from low-income households and 34% without access to a personal device at home.

Building on the partnership that began in 2023, we collaborated with London-based charity Ignite Hubs, which provides accessible, inclusive STEM education for young people in South London, particularly girls, learners with SEND and those from disadvantaged backgrounds. In July 2025, we hosted the launch of Virtual Combat by Tamsin Winter, part of the charity's STEM book career series to spark curiosity and introduce pathways into tech. Our CEO Keri Gilder wrote the foreword and our cybersecurity experts consulted on the content. Our partnership with Ignite Hubs was recognised by the Purpose Coalition with an award for "Closing the Digital and AI Divides," reflecting our impact on digital access, literacy and opportunity.



We also partnered with Tech to the Rescue (TTTR), a global NGO that connects technology companies with mission-driven organisations. We sponsored 20 digital projects supporting NGOs across Europe, Africa, India and the US - advancing digital inclusion, climate action, and economic empowerment through tailored technology solutions. For example:

- **Thaki (Netherlands)** implemented a data and analytics platform to better track outcomes for 35,000+ refugee children
- **The European Disability Forum (Belgium)** received digital collaboration support (SharePoint and Office 365) to improve coordination across an organisation representing over 100 million people with disabilities

- **Reboot The Future (UK)** delivered AI-driven enhancements to its climate education platform, strengthening engagement for 22,000 teachers
- **Hyderabad Urban Lab Foundation (India)** developed a digital strategy to scale climate education and urban resilience programmes

Across our locations, we continued working with organisations advancing digital inclusion for disadvantaged groups. This included support for migrants and refugees in Barcelona, Spain, through coding and technology programmes such as Migracode and CodeWomen+, organised by Open Cultural Center, and collaboration with London branches of Age UK to deliver basic digital literacy training for older people.

GLOBAL VOLUNTEERING

Denmark

Employees joined a canal swim challenge to raise funds for children's rights organisation Børns Vilkår.

The Netherlands

Colt sponsored Team4Bauke in an indoor bike ride honouring a late colleague, contributing to ongoing fundraising efforts to support cancer research through Alpe d'HuZes.

United Kingdom

Across the UK, employees contributed over 400 volunteer hours through activities including a beach clean with The Final Straw, a wildlife conservation day and a MacMillan charity bake sale. In London, the team hosted a "Tech Tea Party" with Age UK, helping older adults build confidence using digital devices while fostering social connection.

Belgium

Volunteers supported Het Balanske by preparing 5,000 chocolate gifts to raise funds for children with disabilities and helped deliver a benefit concert featuring the Scala & Kolacny Brothers choir to celebrate 30 years of partnership.

Portugal

Employees created and delivered 10 Christmas hampers for families supported by ANRAM, funded through pumpkin-jelly sales, raffles and employee food donations.

Spain

Employees held a four-day Christmas Charity Market with donated products, a raffle and a cake contest, raising €3,509 for charities supporting people with neurological conditions, disabilities and social-development needs.

Employees and colleagues across Europe joined the 9th edition of the Barcelona 7-a-side Football World Cup, raising over €8,400 for charitable organisations since its inception.

France

Colt France colleagues took part in a litter-picking initiative in the Jardin d'Acclimatation with Le Cri de La Terre, collecting 26kg of waste while strengthening team spirit and supporting an environmental cause.

Germany

Support for Berlin-based refugee shelter with in-kind donations to create and equip safe space for the youth and children.

Sweden

Volunteers partnered with environmental NGO GreenKayak to clean the Stockholm canals by kayak, improving local waterways in an initiative set to continue in future years.

Austria

Employees organised a donation drive to support the Ute Bock Refugee Project, collecting bedding, towels, kitchenware, food, toys and school supplies to help refugees start a new chapter.

Romania

Colleagues participated in a wreath-making workshop and auction to raise funds for the Sura da Aripa after school programme, benefiting 30 children from an underprivileged community.

Italy

Employees took part in several sports-for-charity initiatives including the Milano Marathon supporting the fight against gender-based violence; inclusive cycling in Rome with disabled adolescents; and padel activities in Turin promoting work inclusion for people with disabilities.

India

More than 120 employees engaged in educational infrastructure activities, including creating meaningful graffiti paintings in school walls, bringing colour, creativity and inspiration to the learning environment.

Hong Kong

The team partnered with Food Angel to prepare and pack more than 2,000 meal boxes for individuals and families in need, helping reduce food waste and support vulnerable communities.

Singapore

Six volunteers supported a YWCA digital literacy workshop, helping women from marginalised backgrounds build digital skills to improve confidence, employability and future opportunities.

Japan

Around 50 volunteers supported the Tokyo 2026 Deaflympics, an international event hosting 2,800 Deaf athletes from 79 countries, reinforcing Colt's commitment to accessibility and inclusion. Colt DCS colleagues hosted a hands-on educational workshop for local children on the theme "Create, Use and Learn Electricity" at the Keihanna Science Festival, and continued their involvement in regional sporting events by supporting the Kyoto stage of the Tour of Japan.

TRUST & ACCOUNT- ABILITY

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UPHOLDING CORPORATE GOVERNANCE

We are committed to transparent, accountable governance that ensures the Colt Group is effectively managed and that our ESG performance continues to strengthen.

Our governance framework supports responsible decision making and safeguards the people who work for, with and around our business.

The Board of Colt Group Holdings Limited oversees decisions affecting both Colt and Colt DCS. As of 31 December 2025, the Board comprised of 9 members, 5 of which are women and 4 that are men.

The Board is supported by five subcommittees:

- DCS Committee (also known as the DCS Board)
- Colt Audit Committee
- DCS Audit Committee
- Colt Remuneration Committee
- DCS Remuneration Committee

Our ESG SteerCo is an executive level committee co-chaired by the CEOs of Colt and Colt DCS. It is responsible for delivering annual ESG targets and ensuring sustainability objectives are embedded across the organisation. The Committee meets at least twice a year and sets Colt's overall sustainability strategy and policies, ensuring alignment across business units and holding leaders accountable for progress.



COLT GROUP BOARD MEMBERS

9 Total board members



MAINTAINING ETHICAL BUSINESS CONDUCT

We operate to the highest legal and ethical standards. Our Code of Business Conduct sets out mandatory standards of conduct and compliance obligations covering ethics, anti-corruption, anti-bribery, anti-fraud, conflicts of interest, whistleblowing and legal compliance.

In 2025, we updated the Code with enhanced guidance on anti-fraud awareness to strengthen prevention and early detection.

Every employee is responsible for following these standards, and all employees are required to complete annual mandatory Code of Business Conduct training. We reinforce this through a culture of compliance that prioritises integrity in every market where we operate.

In the same year, we further embedded compliance across the organisation to ensure accountability and shared ownership of compliance responsibilities at a Group level. This included:

- **Advancing our Compliance by Design framework**, to be rolled out through 2026 alongside the new Compliance Academy knowledge hub.

- **Preparing to launch a Compliance Governance Forum** in 2026 to support structured dialogue, accountability and clear escalation routes.

The Colt Ethics Committee and Colt DCS Governance Committee review any suspected or actual compliance breaches. These committees run monthly awareness activities focused on ethical behaviour, Code adherence and how employees can safely report concerns. Oversight is provided by the Colt Board's Audit Committee, which monitors how breaches and suspected breaches are managed and investigated.

Employees are encouraged to report concerns through the independent Business Ethics Line or directly to the Colt Ethics or DCS Governance Committees. Anonymous reporting is available where permitted by local law. These channels ensure issues can be raised confidentially and without retaliation.

Upon appointment, board members of Colt Group and its subcommittees receive training on their legal duties, including the UK Companies Act 2006 requirements to declare conflicts of interest. All related party transactions are independently assessed as part of the statutory audit.

FRAUD PREVENTION

In response to the UK Economic Crime and Corporate Transparency Act (ECCTA), we strengthened our fraud prevention approach by updating the Code of Business Conduct with enhanced anti-fraud provisions aligned to the new regulatory requirements. Throughout 2025, we rolled out targeted training and awareness sessions on the updated Code, with extra focus on roles identified as being at higher risk of fraud exposure. These steps ensure our people understand their responsibilities, recognise red flags and are equipped to protect Colt and our customers from emerging financial crime threats.

HUMAN RIGHTS

We are committed to running our business responsibly and with respect for human rights.

We have zero tolerance for modern slavery and human trafficking in our operations and supply chain. We work to ensure that everyone who works for, with or around Colt benefits from an environment where fundamental rights and freedoms are upheld.

Our [Modern Slavery Act Statement](#) is available on our website and reviewed annually by our Board.

In 2025, we created a cross-functional Human Rights Due Diligence workstream to strengthen how we identify, assess and manage potential and actual human rights impacts across our operations and value chain. Led by the ESG team and supported by Procurement, Legal, HR, DEI and AI teams, this workstream is building a more robust, aligned approach to safeguarding rights at every stage.

OUR APPROACH IS GROUNDED IN 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



UNGC BUSINESS & HUMAN RIGHTS ACCELERATOR

In 2025, we took part in the UNGC Business & Human Rights Accelerator to strengthen our alignment with the UN Guiding Principles on Business and Human Rights. As part of this work, we focused on identifying our salient human rights impacts, which are considered issues with the greatest potential to cause severe harm to people.

The six month programme included global deep dive sessions, expert consultations and peer learning workshops designed to build capability in identifying salient impacts and establishing an ongoing due diligence process. Through the Accelerator, we completed a human rights impact assessment and developed a formal action plan to address priority risks. This plan is now undergoing validation in 2026, supporting our continued work to embed human rights due diligence across our operations and value chain.

RESPONSIBLE VALUE CHAIN

Colt Group holds suppliers to the same standards we set for ourselves. Our Supplier Code of Conduct mirrors the ethical expectations in our Code of Business Conduct.

All new suppliers must meet Colt's policy and revised due diligence requirements. In 2025, 94% of our supplier spend was with targeted suppliers whose contracts included environmental, labour and human rights clauses.

We actively engage suppliers on ESG through our Vendor Risk Management (VRM) process and quarterly business reviews. We engaged 73% of active suppliers on ESG topics in 2025.

Guided by our Sustainable Procurement Policy, we consider sustainability criteria throughout supplier

selection, management and evaluation. Our RFP process scores suppliers on ESG performance, and our VRM system screens for a broad range of risks, including environmental practices, health and safety, antibribery and corruption, data protection, cybersecurity, AI governance and usage, human rights and modern slavery safeguards.

For new suppliers with an estimated spend above €50k, the full VRM standard applies as a condition of approval. Existing suppliers are reassessed at contract renewal, and ESG performance remains a standing item in every quarterly business review.

All Group Procurement set ESG-related objectives as part of their annual goals.

As discussed in the [Our path to net-zero section](#), we have made notable strides with our suppliers to reduce Colt's supply chain emissions.



COLT GROUP SUPPLIER DATA

+5,000

suppliers from over 55 countries in 2025

73%

of our active suppliers have been engaged on ESG topics

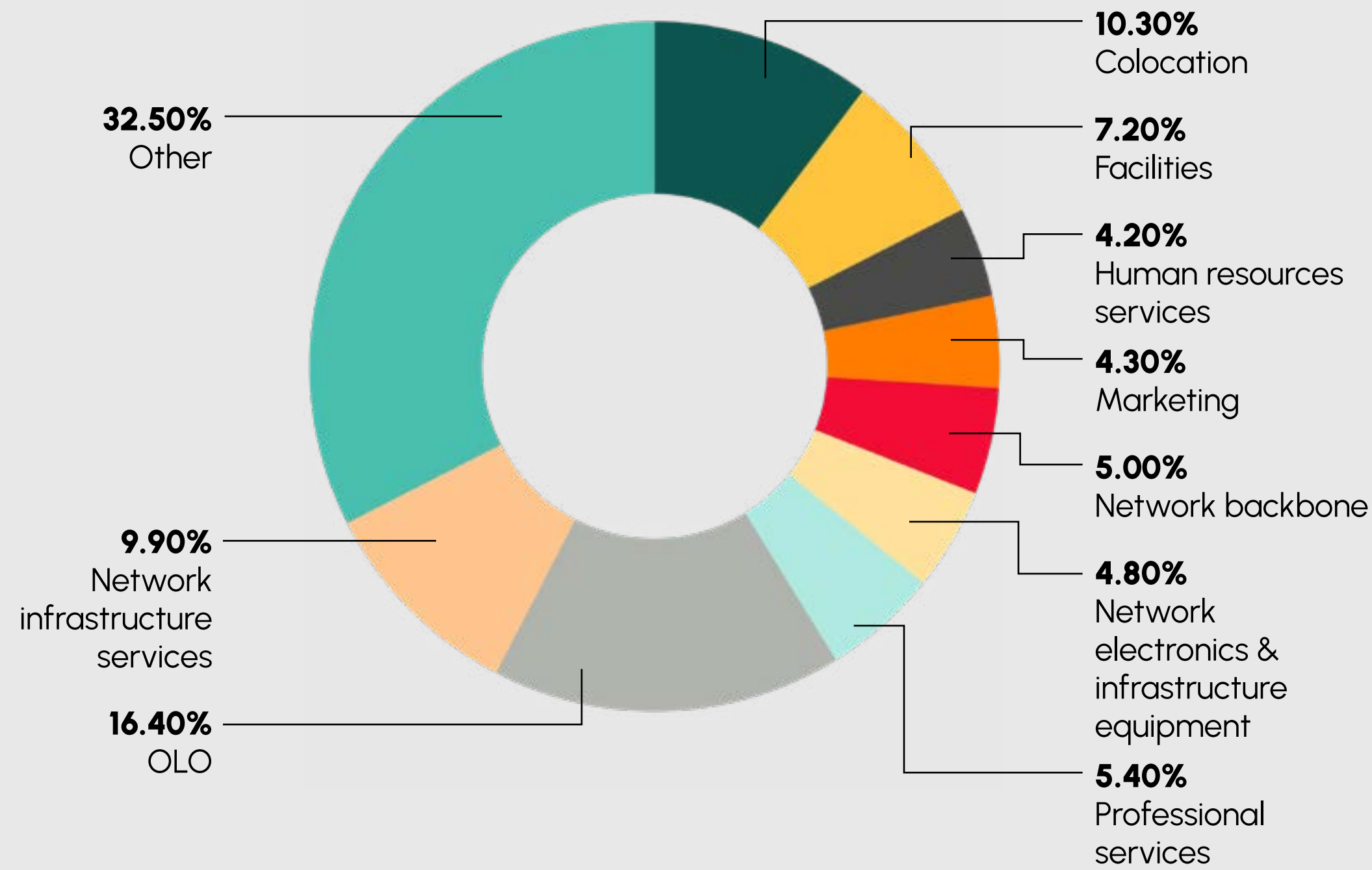
85%

of our suppliers have signed our Supplier Code of Business Conduct

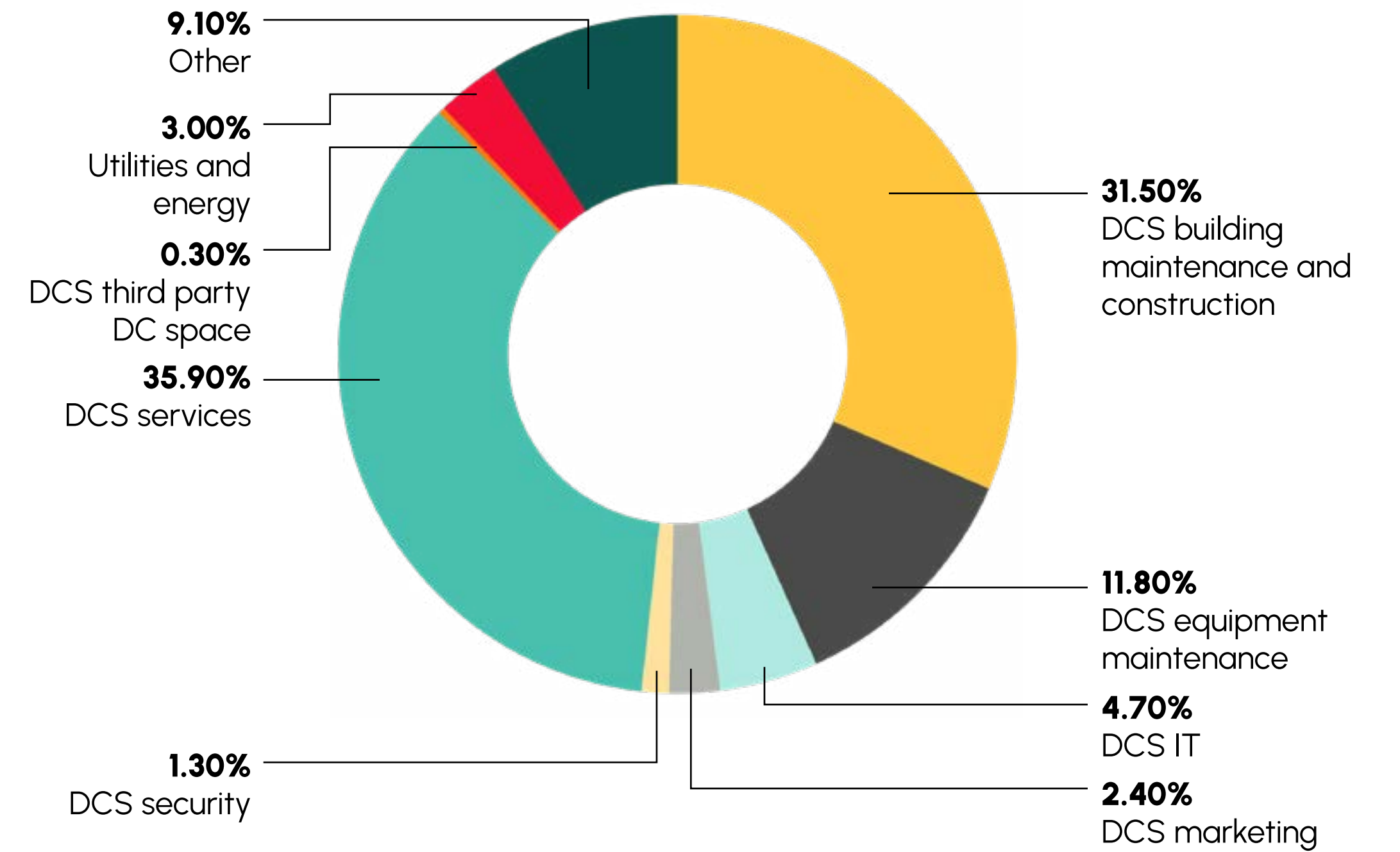
76%

of Colt Group's suppliers that answered our DEI survey reported having a DEI policy

Colt supplier type*



Colt DCS supplier type*



* Based on number of suppliers as of 31st December 2025.

MANAGING ENTERPRISE RISKS



Colt's Enterprise Risk Management (ERM) Framework is supported by the Group Risk team and evaluates our strategic, operational, environmental, and social risks.

Guided by ISO 31000, our approach follows a continuous cycle: identifying risks, assessing their impact, implementing appropriate controls and monitoring them over time.

To strengthen oversight, we established a formal Risk Committee for Colt Core and are advancing the design of an updated ERM framework and model. Colt DCS also operates a Risk Committee structure supported by a Governance, Risk and Compliance team.

Our ERM framework incorporates sustainability risk through multiple sources including the Climate Change Risk Register; country-specific and function-specific risk registers; and ESG Risk Register.

Project-level risk registers may also capture ESG-related risks when relevant. In 2025, we continued reporting climate-related financial disclosures as part of the Colt Group annual report and consolidated financial statements.

Our risk management priorities include:

- Further integration of climate risks into financial and strategic planning
- Aligning with upcoming EU's non-financial reporting regulations, including assessing and managing material risks identified in the 2024 DMA

Across the Group, we completed several targeted risk initiatives during the year:

- Coordinated a rapid risk response to a cyber incident, consolidating risks and actions across functions
- Began implementing a Governance, Risk, and Control (GRC) tool to streamline risk management and compliance activities. Wider rollout to the business will be phased alongside the bottom-up risk methodology refresh

CYBERSECURITY AND DATA PRIVACY

Colt's Data Privacy Statement guides how we manage personal data, and we apply Privacy by Design and Privacy by Default to every product, solution, project, policy and system.

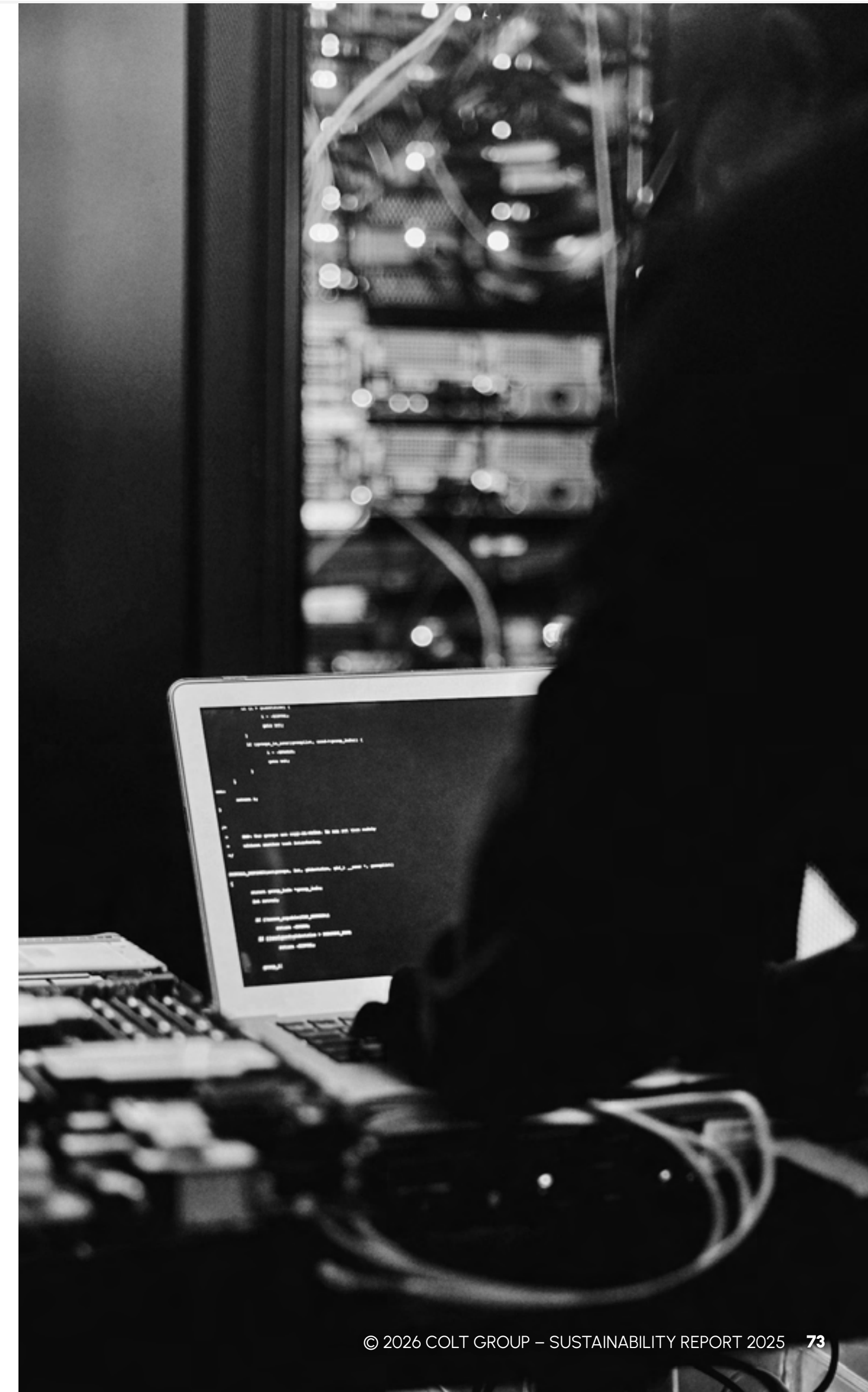
This approach is reinforced by recognised certifications, such as ISO 27001, ISO 27701, ISO 22301 and Cyber Essentials, reflecting our commitment to robust, industry leading cybersecurity and privacy standards. In 2025, our ISO 27001 certification was renewed for three years.

Colt operates a robust and proactive data protection framework focused on data minimisation, transparency, and strict confidentiality controls. The processing of personal data is strictly limited to what is necessary, with systems and forms designed to prevent excessive data collection and ensure that data remains accurate on an ongoing

basis through regular audits. In line with the GDPR transparency requirements, Colt provides clear and accessible privacy notices for all stakeholders, including customers, candidates, employees and suppliers, which are published both externally and internally.

To further strengthen privacy management, Colt operates a Privacy Information Management System (PIMS) certified to ISO 27701. The framework applies to both data controller and data processor activities and includes documented privacy policies, risk assessments, defined controls and ongoing compliance monitoring. Annual privacy audits are conducted across five countries, with jurisdiction-specific KPIs agreed each year to drive continuous improvement and track progress against privacy and compliance objectives.

Colt proactively monitors and responds to evolving directives, regulations and local requirements across all regions in which it operates. Cybersecurity programmes and risks are regularly reviewed by Management, covering people, processes, applications, IT infrastructure and network security.



This governance ensures Colt remains resilient to emerging threats, maintains regulatory compliance and continues to protect customer and organisational data.

In mid-August 2025, we identified a cyber incident affecting one of our internal business support systems. We took immediate precautionary action, including the temporary shutdown of certain systems. The incident was promptly reported to relevant authorities, customers were informed and external cybersecurity experts were brought in to support containment and recovery. The threat was contained, and our systems were fully restored and secured. The incident management process is now formally closed. Since then, we have further enhanced our detection and response capabilities with advanced tooling and expert guidance.

Colt maintains a comprehensive global data-breach response framework, supported by an incident response plan that is tested annually through simulation exercises. These exercises include realistic scenarios and role-based crisis drills involving key teams and management, ensuring operational readiness and coordinated response.

All employees and contractors complete mandatory annual data-protection and security training, delivered in multiple languages and requiring a minimum pass mark of 80%.

Training includes targeted modules for specific functions (such as Human Resources) and dedicated content on data breaches and incident reporting. Completion and pass rates remain consistently

high across the Group (>98%). Ongoing awareness is reinforced through phishing simulations, post-incident reviews, audit-readiness initiatives and Colt's Cyber Intelligence Series, an interactive forum led by the Cyber Threat Intelligence team exploring emerging threats, trends and practical security guidance.

Throughout 2025, we advanced several key improvements to strengthen security, privacy and compliance:

- **Zero Trust secure remote access:** We migrated from VPN to a Zero Trust solution to support safer remote working.
- **UK Binding Corporate Rules (BCRs):** We obtained UK BCR approval, adding to our EU BCRs. Colt is now among a small number of companies operating under approved BCR frameworks in both jurisdictions, which is a strong signal of our commitment to data protection excellence.
- **Security capability enhancements:** Strengthened detection and response capabilities through enhanced tooling, testing and expert-led improvements.
- **Privacy transparency:** Developed and published privacy statements for 13 Colt products, reinforcing Privacy by Design and improving customer clarity on data-processing practices.

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. In 2025, Colt DCS achieved the ISO 27001 certification for its latest Asia Data Centre, further expanding its certified estate.

DATA PROTECTION TRAINING

99%

completion rate both for new joiners and for all employees

SECURITY AWARENESS TRAINING

99%

completion rate both for new joiners and for all employees

BUILDING AND USING AI RESPONSIBLY

AI has the potential to unlock innovation and improve outcomes in both the virtual and physical world. However, as AI adoption accelerates, it also introduces real challenges, from rising energy and water demands and embedded impacts of specialist hardware, to ethical and organisational risks such as bias, lack of transparency, privacy concerns, security vulnerabilities and the potential for misuse. That is why we are committed to developing and deploying AI in a way that aligns to our organisational values, with robust governance and controls and clear accountability to ensure AI is responsible, well governed and fit for purpose.

Colt's AI Strategy is grounded in a "governed by design" approach, guided by Colt's Responsible AI Principles.

Colt's AI Management system incorporates organisation-wide AI policies, a robust and evolving AI governance framework, and targeted training and awareness programmes to ensure teams understand both AI's opportunities and limitations. This includes an intensive AI accelerator programme, through which around 100 colleagues deepened their practical and ethical understanding of AI, helping to embed responsible AI capabilities across the organisation. To support this at scale, we have also established a dedicated AI Office to coordinate governance, standards, delivery and oversight.

Recognising the complexity of AI innovation and governance, we ensure that our AI management system and governance framework



incorporates input and oversight from experts and stakeholders with diverse expertise and viewpoints.

This commitment extends to thought leadership, including our publication, "How Telcos Can Embrace AI Without Leaving People Behind," which is highlighted on [page 52](#). Omdia, part of Informa

OUR RESPONSIBLE AI PRINCIPLES:

-  Fairness
-  Transparency and Explainability
-  Accountability and Redress
-  Sustainability
-  Security and Robustness
-  Privacy and Personal Data Protection

TechTarget, has also published a report on Colt's AI approach, "Using AI To Address Strategic Opportunities at Colt," which details how our AI implementation, with responsible AI at the foundation, is driving positive change across multiple functional areas of our business. To learn more, [download the white paper](#).

APPENDICES

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EXTERNAL ASSURANCE STATEMENT

To: The Stakeholders of Colt Group Holdings Ltd

1. Introduction and Objectives of Work

Bureau Veritas UK Ltd (Bureau Veritas) has been engaged by Colt Group Holdings Ltd (Colt) to provide limited assurance of the Colt Group 2025 Sustainability Report ('the Report') published on the link <https://www.colt.net/about/esg/sustainability-report>. The objective is to provide assurance to Colt and its stakeholders over the accuracy and reliability of the reported information and data.

2. Scope of Work

The scope of our work was limited to assurance over the Report for the period 1st January 2025 to 31st December 2025 (the 'Selected Information'). The Report includes the following sections:

- Introduction
- Innovation and Impact
- Climate and Circularity
- People and Communities
- Trust and Accountability
- Appendices

3. Reporting Criteria

The Selected Information has been prepared in accordance with the Global Reporting Initiative (GRI) Sustainability Reporting Standards, as set out at <https://www.globalreporting.org/how-to-use-the-gri-standards/gri-standards-english-language/>.

4. Limitations and Exclusions

Excluded from the scope of our work is assurance of information relating to:

- Financial data, including financial data that feeds into the calculation of Selected Information as these are audited by an external financial auditor and are relied on as accurate for the purposes of our scope of work. This includes but is not limited to any statements relating to production, sales, revenue, salaries, payments, and financial investments;
- Information related to activities outside the defined reporting period or scope;
- Company positional statements (including any expression of opinion, belief, aspiration, expectation, aim or future intent) and any Colt or third-party anecdotes or testimonials;

- Content of external websites or documents linked from the Report;
- Appropriateness of any new targets, commitments, and objectives established and communicated by Colt; and
- Appropriateness of definitions and any internal reporting criteria adopted by Colt for its disclosures.

The following limitations should be noted:

- This limited assurance engagement relies on a risk-based selected sample of sustainability data and the associated limitations that this entails;
- The reliability of the reported data is dependent on the accuracy of metering and other production measurement arrangements employed at site level, not addressed as part of this assurance; and
- This independent statement should not be relied upon to detect all errors, omissions or misstatements that may exist.

5. Responsibilities

This preparation and presentation of the Selected Information in the Report are the sole responsibility of the management of Colt.

Bureau Veritas was not involved in the drafting of the Report or of the Reporting Criteria. Our responsibilities were to:

- Provide limited level assurance as per ISAE 3000 over the accuracy, reliability, and objectivity of the information contained within the Report;

- Form an independent conclusion based on the assurance procedures performed and evidence obtained; and
- Report our conclusions to the Directors of Colt.

6. Assessment Standard

We performed our work to a limited level of assurance in accordance with International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements Other than Audits or Reviews of Historical Financial Information (effective for assurance reports dated on or after December 15, 2015), issued by the International Auditing and Assurance Standards Board.

7. Summary of Work Performed

As part of our independent assurance, our work included:

1. Conducting interviews with relevant personnel from the Colt core ESG team as well as data owners from Health & Safety, HR, and Risk teams;
2. Reviewing the data collection and consolidation processes used to compile Selected Information, including assessing assumptions made, and the data scope and reporting boundaries;
3. Reviewing documentary evidence provided by Colt;
4. Agreeing a selection of the Selected Information to the corresponding source documentation;

5. Reperforming a selection of aggregation calculations of the Selected Information;
6. Reperforming Greenhouse Gas (GHG) emissions conversions calculations;
7. Reviewing Colt systems for quantitative data aggregation and analysis; and
8. Assessing the disclosure and presentation of the Selected Information to ensure consistency with assured information.

A 5% materiality threshold was applied to quantitative indicators. It should be noted that the procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

8. Conclusion

On the basis of our methodology and the activities and limitations described above nothing has come to our attention to indicate that the Selected Information is not fairly stated in all material respects.

Any material errors or misstatements identified during the assurance engagement were corrected prior to the Report being published.

9. Statement of Independence, Integrity and Competence

Bureau Veritas is an independent professional services company that specialises in quality, environmental, health, safety and social accountability with over 190 years history. Its assurance team has extensive experience in conducting verification over environmental, social, ethical and health and safety information, systems and processes.

Bureau Veritas operates a certified⁸ Quality Management System which complies with the requirements of ISO 9001:2015 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, quality reviews and applicable legal and regulatory requirements which we consider to be equivalent to ISQM 1 & 2⁹.

Bureau Veritas has implemented and applies a Code of Ethics, which meets the requirements of the International Federation of Inspections Agencies (IFIA)¹⁰, across the business to ensure that its employees maintain integrity, objectivity, professional competence and due care, confidentiality, professional behaviour and high ethical standards in their day-to-day business activities. We consider this to be equivalent to the

requirements of the IESBA code¹¹. The assurance team for this work does not have any involvement in any other Bureau Veritas projects with Colt.



Bureau Veritas UK Ltd

Registered in England & Wales,
Company Number: 1758622

Registered Office: Suite 206
Fort Dunlop, Fort Parkway,
Birmingham, B24 9FD

London, 17th June 2026

Ref: BV_ 29496450

⁸ Certificate available on request

⁹ International Standard on Quality Management 1 (Previously International Standard on Quality Control 1) & International Standard on Quality Management 2

¹⁰ International Federation of Inspection Agencies – Compliance Code – Third Edition





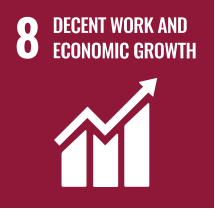
¹¹ Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants

COLT GROUP CERTIFICATIONS & MANAGEMENT SYSTEMS

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

COMMITMENT TO UN SDGS

Colt is committed to supporting the UN Sustainable Development Goals (SDGs) by actively participating in the UNGC, 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
	<p>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.</p>	<p>Supporting our workforce</p>
	<p>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.</p>	<p>Supporting our workforce</p>
	<p>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.</p>	<p>Supporting our workforce Responsible business practices</p>
	<p>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.</p>	<p>Our commitment to the environment</p>
	<p>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.</p>	<p>Pioneering sustainable services Responsible business practices</p>

SDG	Examples of activities	Where to read more
	<p>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.</p>	<p>Pioneering sustainable services</p>
	<p>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.</p>	<p>Responsible business practices</p>
	<p>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.</p>	<p>Our commitment to the environment</p>
	<p>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.</p>	<p>Our commitment to the environment</p>
	<p>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.</p>	<p>Pioneering sustainable services Responsible business practices</p>
	<p>We partner with other companies to achieve industry best practice, share knowledge and develop resources to achieve the SDGs collectively.</p>	<p>Pioneering sustainable services Supporting our workforce</p>



GREENHOUSE GAS 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.

Colt Group GHG emissions cover the following categories:

- **Scope 1:** Natural gas, fuel from own fleet, refrigerants, 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)
- 2025 GHG emissions include all Colt Group countries except for: South Korea
- Emissions for 2019 do not include data on the United States, South Korea and Poland – deemed immaterial considering the emissions associated with those countries.

• Emission factors used:

- BEIS (DEFRA) 2025, 2024, 2023 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
- 2025 MITECO emission factors for Scope 1 and Scope 2 in Spain
- Electricity emission factors are based on IEA (2025), using 2023 as the latest complete dataset for countries in which Colt operates. Additionally, IEA emission factors were used for 2024, 2023 and 2019 Scope 2 electricity in Europe, Asia and United States, and Scope 3 categories (homeworking, DLA, upstream leased assets and FERA).¹²
- Transition from Carbon Trust EEIO emission factors to CEDA emission factors for Scope 3 spend-based GHG emission calculations in 2025, 2024, 2023 and 2019.
- PG&S and Capital Goods supplier specific-emissions factors were applied for all spend relating to Colt selected suppliers

We are continually working towards best practices, collecting actual data and updating methodologies. In accordance with the GHG Protocol and Colt Group's rebase guidelines (defining significant change as +/- 5% of total emissions), Colt Group recalculated its 2019 GHG emissions base year to reflect the divestment of eight Lumen EMEA data centers across Europe and the transition to CEDA emission factors to allow for geographical granularity.

The highest quality, most complete and consistent data available within the data collection period was prioritised and applied. Where data gaps existed (for 2025 reporting period in Scope 1 Natural Gas, Fuels & Refrigerants, Scope 2 Electricity consumption, and Scope 3 Waste generated in operations, Water, and Employee commuting), estimated data was used, typically based on 2024 values as a proxy. In cases where sufficient actual data was available to represent part of the full year, figures were extrapolated using the weighted or straight average to cover the full year within the reporting boundary.

Restatements on Colt Group GHG emissions reported in 2025:

- Spend-based calculations in Scope 3 for Colt (2019, 2023 and 2024) were restated due to an update on spend-based emission factors.

We have moved from EEIO provided by the Carbon Trust to CEDA emission factors.

- Colt Group GHG emissions calculations (2019, 2023 and 2024) were revisited to account for the divestment of eight Lumen EMEA data centres at the end of 2025 as well as the correction of the inflation rate applied within the rebase exercise done in 2024 due to Lumen EMEA acquisition and improved data quality.
- The re-baselining affected multiple emission categories to reflect updated organisational boundaries. Scope 1 and Scope 2 were restated to remove emissions from fuels, refrigerants, and electricity consumption associated with the divested data centres. Within Scope 3, Category 3.1 was updated to exclude procurement related to these facilities, while Category 3.3 was adjusted to reflect reduced upstream emissions from energy consumption. Category 3.8 was also recalculated to capture emissions from activities retained in those data centres under a tenant model, and finally Category 3.13 was restated to remove emissions from third party use in those data centers.

¹²We convert IEA generation factors from gCO₂e/kWh to kg and reconstruct CH₄ and N₂O using AR6 GWPs, consistent with the IEA methodology. A CO₂ trade adjustment is then applied to obtain the final generation emission factor. Upstream emission factors are sourced by the IEA database and include transmission and distribution (T&D) losses, fuel lifecycle emissions and T&D fuel lifecycle emissions.



DATA TABLES

INNOVATION AND IMPACT

Customer Net Promoter Score (NPS)

	2023	2024	2025
DCS Global*	74	75	-
DCS Asia*	71	68	-
DCS Europe and UK*	79	84	-
One Colt	NA	58	54
Colt EU	76	68	55
Colt Asia	77	62	47

* DCS has not measured NPS for 2025. Beginning in FY25/26, DCS transitioned to an effort based customer experience framework that more directly measures ease of doing business across key service touchpoints. Therefore, NPS is no longer included in the DCS customer metric set.

CLIMATE AND CIRCULARITY

Environmental management

	2023	2024	2025*
% of operational sites assessed on specific environmental risks	93%	93%	63%
% of operational sites with an environmental certification, such as ISO14001, Eco-Management and Audit Scheme (EMAS), ISO50001	93%	93%	63%

* The deviation in 2025 data compared to previous years is primarily attributed to the integration of Lumen EMEA sites in this calculation.

Colt Group owned vehicle fleet*

	2023	2024	2025	2024/2025 variation (%)
Number of Battery Electric Vehicles	101	135	117	-13.33%
% of Battery Electric Vehicles	30.06%	30.34%	30.79%	-
Number of Hybrid Electric Vehicles	128	185	196	+5.95%
% Hybrid Electric Vehicles	38.10%	41.57%	51.58%	-
Total vehicles**	336	445	380	-14.61%

*2023 figures do not include Lumen EMEA vehicle fleet data.

**Total vehicle fleet owned by Colt Group.

Colt Group GHG emissions*

Category	2019 (baseline)	2023	2024	2025	Variation against 2019 (baseline)	Variation against 2024
Gross direct (Scope 1) GHG emissions in metric tonnes of CO₂e	6,658.19	4,303.18	3,805.91	3,147.71	-52.72%	-17.29%
Gross location-based indirect (Scope 2) GHG emissions in metric tonnes of CO₂e	112,436.57	72,634.13	65,601.47	47,368.75	-57.87%	-27.79%
Gross market-based indirect (Scope 2) GHG emissions in metric tonnes of CO₂e	45,213.93	11,771.87	6,940.71	3,635.43	-91.96%	-47.62%
Gross indirect (Scope 3) emissions in metric tonnes of CO₂e	775,983.06	493,623.51	426,481.43	486,131.19	-37.35%	13.99%
Gross direct and indirect market-based (Scope 1+2) GHG emissions in metric tonnes of CO₂e	51,872.12	16,075.05	10,746.62	6,783.13	-86.92%	-36.88%
Total market-based emissions in metric tonnes of CO₂e	827,855.18	509,698.56	437,228.05	492,914.32	-40.46%	12.74%

*a. Scope 3 and total emissions reported in graph; 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 account for the divestment of eight Lumen EMEA data centres at the end of 2025 as well as the correction of the inflation rate applied within the rebaseline exercise done in 2024 due to Lumen EMEA acquisition and improved data quality. Categories 1 and 2 of Scope 3 were restated due to an update on spend-based emission factors. We have moved from EEIO emission factors provided by the Carbon Trust to CEDA emission factors to improve geographical specificity.

c. 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 gases calculation methodology

Energy consumption*

	2023	2024	2025
Non-renewable sources			
Natural Gas (MWh)	1,628.18	2,489.65	1,492.54
Other fuels (l)	419,231.00	474,879.83	213,725.23
Electricity consumption (MWh)			
Total electricity (including heating & cooling)**	254,172.85	247,194.93	185,126.73
Total electricity (excluding heating & cooling)	251,933.65	246,538.36	184,661.68
Renewable electricity	191,848.11	229,076.77	175,042.58
Renewable sources			
Renewable electricity (% share of total excluding heating & cooling)	76.15%	92.92%	94.79%

* Data for 2023 to 2024 include Lumen EMEA where available and estimated where it was not.

** 2025 electricity consumption includes EVs charged both in office and outside office because the two categories aren't able to be split at this time.

Waste*

	2023	2024	2025
Waste generation (tonnes)			
Non-hazardous waste generated	153.00	777.17	611.75
Hazardous waste generated	403.00	430.03	171.19
Total waste generated	556.00	1,207.20	782.94
Hazardous waste by disposal type (tonnes)			
Recycled	152.00	430.03	170.38
Landfill**	0.00	0.002	0.01
Waste to energy	0.00	0.00	0.80
Total hazardous waste diverted from disposal	152.00	430.03	171.18
Total hazardous waste directed to disposal	0.00	0.002	0.01
Non-hazardous waste by disposal type (tonnes)			
Recycled	197.00	354.50	313.96
Landfill	114.00	95.19	89.77
Waste to energy	92.00	327.47	208.02
Total non-hazardous waste diverted from disposal	289.00	681.98	521.98
Total non-hazardous waste directed to disposal	114.00	95.19	89.77

	2023	2024	2025
Total waste by disposal type (tonnes)			
Recycled	349.00	784.53	484.34
Landfill	114.00	95.20	89.78
Waste to energy	92.00	327.47	208.82
Total waste diverted from disposal	441.00	1,112.00	693.16
Total waste directed to disposal	114.00	95.20	89.78

*2023 data do not include Lumen EMEA.

**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*

	2023	2024	2025
Number of Colt quality second-hand equipment units**	6,183	5,493	3,896
Number of Colt extended life equipment units by reuse	42,670	48,944	41,683

* 2023 data do not include Lumen EMEA.

**There was a 15% decrease in number of reused equipment and 29% decrease in purchased second-hand equipment due to business challenges.

CULTIVATING TOP TALENT

- 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, 2025.
- 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

Region	Gender	2023	2024	2025
France	Female	99	99	97
	Male	223	225	219
Germany	Female	120	113	105
	Male	398	377	362
India	Female	475	516	539
	Male	1,441	1,447	1,427
Japan	Female	87	80	119
	Male	253	256	275
Spain	Female	246	247	241
	Male	363	353	336
United Kingdom	Female	510	468	442
	Male	1,218	1,051	934
Rest of Colt	Female	577	553	525
	Male	716	683	650
Total number		6,726	6,468	6,271

Total number of full-time and part-time employees, and a breakdown by gender and by region

		2023			2024			2025		
		F	M	Total	F	M	Total	F	M	Total
France	Full-time	94	222	316	93	224	317	91	218	309
	Part-time	5	1	6	6	1	7	6	1	7
	Total	99	223	322	99	225	324	97	219	316
Germany	Full-time	66	382	448	62	359	421	53	348	401
	Part-time	54	16	70	51	18	69	52	14	66
	Total	120	398	518	113	377	490	105	362	467
India	Full-time	475	1,441	1,916	516	1,447	1,963	539	1,427	1,966
	Part-time	0	0	0	0	0	0	0	0	0
	Total	475	1,441	1,916	516	1,447	1,963	539	1,427	1,966
Japan	Full-time	87	253	340	80	256	336	119	275	394
	Part-time	0	0	0	0	0	0	0	0	0
	Total	87	253	340	80	256	336	119	275	394
Spain	Full-time	217	360	577	224	351	575	220	333	553
	Part-time	29	3	32	23	2	25	21	3	24
	Total	246	363	609	247	353	600	241	336	577
United Kingdom	Full-time	453	1,211	1,664	421	1,046	1,467	395	927	1,322
	Part-time	57	7	64	47	5	52	47	7	54
	Total	510	1,218	1,728	468	1,051	1,519	442	934	1,376
Rest of Colt	Full-time	552	700	1,252	528	667	1,195	504	634	1,138
	Part-time	25	16	41	25	16	41	21	16	37
	Total	577	716	1,293	553	683	1,236	525	650	1,175
Total	Full-time	1,944	4,569	6,513	1,924	4,350	6,274	1,921	4,162	6,083
	Part-time	170	43	213	152	42	194	147	41	188
	Total	2,114	4,612	6,726	2,076	4,392	6,468	2,068	4,203	6,271

Total number of permanent and temporary employees, and a breakdown by gender and by region

		2023			2024			2025		
		F	M	Total	F	M	Total	F	M	Total
France	Permanent	95	221	316	98	225	323	96	217	313
	Temporary	4	2	6	1	0	1	1	2	3
	Total	99	223	322	99	225	324	97	219	316
Germany	Permanent	116	384	500	110	367	477	103	355	458
	Temporary	4	14	18	3	10	13	2	7	9
	Total	120	398	518	113	377	490	105	362	467
India	Permanent	474	1,439	1,913	510	1,439	1,949	524	1,414	1,938
	Temporary	1	2	3	6	8	14	15	13	28
	Total	475	1,441	1,916	516	1,447	1,963	539	1,427	1,966
Japan	Permanent	83	250	333	78	251	329	110	270	380
	Temporary	4	3	7	2	5	7	9	5	14
	Total	87	253	340	80	256	336	119	275	394
Spain	Permanent	244	362	606	246	351	597	240	336	576
	Temporary	2	1	3	1	2	3	1	0	1
	Total	246	363	609	247	353	600	241	336	577
United Kingdom	Permanent	489	1,208	1,697	455	1,039	1,494	435	924	1,359
	Temporary	21	10	31	13	12	25	7	10	17
	Total	510	1,218	1,728	468	1,051	1,519	442	934	1,376
Rest of Colt	Permanent	467	677	1,144	486	660	1,146	474	636	1,110
	Temporary	110	39	149	67	23	90	51	14	65
	Total	577	716	1,293	553	683	1,236	525	650	1,175
Total	Permanent	1,968	4,541	6,509	1,983	4,332	6,315	1,982	4,152	6,134
	Temporary	146	71	217	93	60	153	86	51	137
	Total	2,114	4,612	6,726	2,076	4,392	6,468	2,068	4,203	6,271

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

		2023			2024			2025		
		F	M	Total	F	M	Total	F	M	Total
France	Total new hire	25	36	61	8	11	19	8	8	16
	New hire rate	25.25	16.14	18.94	8.08	4.89	5.86	8.08	3.61	5.00
	Turnover	12	14	26	10	9	19	9	14	23
	Turnover rate	13.79	6.97	9.03	10.20	4.05	5.94	9.11	6.32	7.18
Germany	Total new hire	19	80	99	1	11	12	4	16	20
	New hire rate	15.83	20.10	19.11	0.88	2.92	2.45	3.61	4.30	4.14
	Turnover	7	18	25	7	33	40	12	32	44
	Turnover rate	6.36	5.25	5.52	6.09	8.48	7.94	10.83	8.60	9.11
India	Total new hire	54	110	164	75	88	163	55	77	132
	New hire rate	11.37	7.63	8.56	14.53	6.08	8.30	10.33	5.34	6.69
	Turnover	46	108	154	34	81	115	33	100	133
	Turnover rate	9.64	7.41	7.96	6.98	5.64	5.98	6.20	6.94	6.74
Japan	Total new hire	16	32	48	8	30	38	46	33	79
	New hire rate	18.39	12.65	14.12	10.00	11.72	11.31	50.06	12.49	22.18
	Turnover	8	33	41	15	29	44	7	17	24
	Turnover rate	9.30	12.74	11.88	18.07	11.11	12.79	7.62	6.43	6.74

*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 region* (continued)

		2023			2024			2025		
		F	M	Total	F	M	Total	F	M	Total
Spain	Total new hire	24	25	49	9	11	20	7	8	15
	New hire rate	9.76	6.89	8.05	3.64	3.12	3.33	2.88	2.32	2.55
	Turnover	12	20	32	8	20	28	14	23	37
	Turnover rate	5.06	5.67	5.42	3.25	5.54	4.61	5.76	6.67	6.29
United Kingdom	Total new hire	303	708	1011	47	62	109	35	60	95
	New hire rate	59.41	58.13	58.51	10.04	5.90	7.18	7.57	5.91	6.43
	Turnover	35	88	123	87	218	305	63	174	237
	Turnover rate	11.51	12.85	12.44	17.33	18.71	18.30	13.63	17.15	16.05
Rest of Colt	Total new hire	190	176	366	37	16	53	27	25	52
	New hire rate	32.93	24.58	28.31	6.69	2.34	4.29	5.14	3.85	4.43
	Turnover	43	41	84	59	50	109	54	62	116
	Turnover rate	9.31	6.86	7.92	10.39	7.10	8.57	9.85	9.19	9.49
Total	Total new hire	631	1167	1798	185	229	414	182	227	409
	New hire rate	29.85	25.30	26.73	8.91	5.21	6.40	8.72	5.24	6.37
	Turnover	163	322	485	220	440	660	192	422	614
	Turnover rate	9.25	8.26	8.57	10.49	9.70	9.95	9.20	9.74	9.56

*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*

		2023			2024			2025		
		F	M	Total	F	M	Total	F	M	Total
Gen Z (born after 1994)	Total new hire	100	134	234	68	53	121	57	51	108
	New hire rate	44.84	52.34	48.85	27.20	20.38	23.73	21.83	18.94	20.36
	Turnover	23	35	58	40	49	89	45	46	91
	Turnover Rate	13.77	18.52	16.29	17.24	18.92	18.13	17.23	17.09	17.16
Gen Y (born between 1980-1994)	Total new hire	301	390	691	89	122	211	98	129	227
	New hire rate	26.438	19.13	21.73	7.96	6.16	6.81	8.68	6.57	7.34
	Turnover	99	167	266	111	175	286	93	186	279
	Turnover Rate	9.95	9.03	9.35	9.80	8.64	9.06	8.24	9.48	9.02
Gen X (born between 1965 - 1979)	Total new hire	202	518	720	23	52	75	22	41	63
	New hire rate	29.549	26.37	27.18	3.53	2.80	2.99	3.43	2.25	2.55
	Turnover	34	90	124	56	155	211	48	133	181
	Turnover Rate	6.15	5.65	5.78	8.33	8.05	8.12	7.48	7.29	7.34
Baby Boomers (born before 1965)	Total new hire	28	125	153,0	5	2	7	5	6	11
	New hire rate	43.08	35.41	36.60	8.77	0.71	1.99	8.95	2.17	3.31
	Turnover	7	30	37	13	61	74	6	57	63
	Turnover Rate	14.58	1,1.28	11.78	21.31	18.54	18.97	10.74	20.64	18.98
TOTAL	Total new hire	631	1,167	1,798	185	229	414	182	227	409
	New hire rate	29.85	25.30	26.73	8.91	5.21	6.40	8.72	5.24	6.37
	Turnover	163	322	485	220	440	660	192	422	614
	Turnover Rate	9.25	8.26	8.57	10.49	9.70	9.95	9.20	9.74	9.56

*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 mandatory training completion rates

	2023		2024		2025	
	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	99.29%	95.71%	99.51%	99.44%	99.57%	98.79%
Conscious inclusion	99.47%	98.23%	99.33%	100.0%	99.20%	98.55%
Prevention of Sexual Harassment in Workplace (PoSh)*	99.77%	97.66%	99.50%	98.01%	99.62%	97.45%
Security Awareness	98.74%	98.23%	99.00%	98.84%	98.59%	98.55%
Code of Conduct	99.31%	97.47%	97.15%	99.40%	98.75%	98.79%
Data Protection	99.39%	98.99%	99.31%	100.0%	99.34%	99.27%
Brand and Vision**	-	97.52%	99.50%	99.20%	-	98.41%
Health And Safety***	-	97.22%	94.14%	97.32%	-	99.04%
Action on Environmental Sustainability	99.77%	97.98%	99.67%	99.71%	99.11%	98.54%

*Colt employees joining from Lumen EMEA did not participate in this training in 2024.

**Training not provided to Colt DCS employees.

***Figures refer to Colt. Completion rate for Colt DCS was 97% in 2025.

Early Career Programme*

	2023	2024	2025
Total number of early careers hires	33	37	67

*Figures do not include Colt DCS.

Performance review

	2023	2024	2025
Percentage of employees who receive regular performance and career development reviews	99%	99%	99%

Safety performance

	2023	2024	2025	
Injuries	The number of recordable work-related injuries	3	7	7
	The rate of recordable work-related injuries; (x 200,000)	0.0650	0.1193	0.1285
	The rate of recordable work-related injuries (x 1,000,000)	0.3251	0.5965	0.6424
Ill-health	The number of fatalities as a result of work-related ill health	0	0	0
	The number of cases of recordable work-related ill health	0	0	0
Fatalities	The number of fatalities as a result of work-related injury	0	0	0
	The rate of fatalities as a result of work-related injury (x 200,000)	0	0	0
	The rate of fatalities as a result of work-related injury (x 1,000,000)	0	0	0
Total hours worked	9,226,602	11,735,579	10,896,657	

COMMUNITY IMPACT

Volunteering and donations*

	2023	2024	2025	Variation
Days volunteered	867	1,033.5	872	-15.62%
Amount donated to charities** (Euros)	264,218	564,940	365,678	-35.27%

* Figures do not include Colt DCS.

** 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.

TRUST AND ACCOUNTABILITY

Board composition

	2023			2024			2025		
	Total	Of which Women	% of women	Total	Of which Women	% of women	Total	Of which Women	% of women
Number on board	4	3	75%	8	5	63%	9	5	56%
Number of which executive	1	1	100%	2	2	100%	2	2	100%
Number of which non-executive	3	2	67%	6	3	50%	7	3	43%
Number of which independent	0	0	0%	0	0	0%	0	0	0%

Supplier engagement

	2023	2024	2025
Supply chain emissions covered by an approved SBT	40.16%	39.40%	52.95%
Colt Group suppliers that have committed to setting an SBT (by % of emissions)	4.11%	2.50%	2.18%
Colt Group suppliers that have signed a Sustainability Schedule (by % of emissions)	0.91%	14.44%	8.54%
Supply chain emissions are with suppliers that have already set a SBT, committed to setting a SBT or signed a Sustainability Schedule	45.18%	56.34%	63.67%
Number of suppliers who have signed the SBTi Schedule	6	61	83
Suppliers that have signed the Colt Group Supplier Code of Conduct	89.03%	76.40%	85.40%
Suppliers who have been engaged on ESG topics	72.74%	66.25%	73.25%
Percentage of suppliers with contracts that include environmental, labour and human rights requirements	68.57%	59.49%	72.85%
Percentage of suppliers with contracts that include environmental, labour and human rights requirements (by spend equivalent)	93.00%	90.95%	94.00%
Percentage of buyers across all locations who have received training on sustainable procurement	100%	100%	100%

* The overall decrease when comparing 2024 and 2023 figures was broadly due to the increase in the total number of suppliers as a result of the integration of Lumen EMEA.

GRI REPORTING INDEX

Statement of use	Colt Group has reported in accordance with the GRI Standards for the period 1 January 2025 – 31 December 2025.
GRI 1 used	GRI 1: Foundation 2021

GRI Standard	Disclosure	Location/Direct Answer
GRI 2: General Disclosures 2021	2-1 Organisational details	<p>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').</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Colt Group has subsidiaries in the countries listed in the Subsidiary undertakings section of the latest consolidated financial statements filed at Companies House.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 2: General Disclosures 2021	2-2 Entities included in the organisation's sustainability reporting	<p>Colt Group has 116 subsidiary undertakings, as per the latest consolidated financial statements filed at Companies House. This Sustainability Report encompasses all subsidiaries.</p> <p>Sustainability information reflects operations under Colt's control; minority interests are not reported separately unless otherwise noted. Changes to the Group structure, including mergers, acquisitions, or disposals, are incorporated into the reporting boundary during the relevant reporting period as systems and data are integrated - for example following the acquisition of Lumen EMEA in 2023. Unless otherwise specified, this consolidation approach is applied consistently across disclosures and material topics in this report.</p>
	2-3 Reporting period, frequency and contact point	<p>This is Colt Group's fifth Sustainability Report. These reports are published on an annual basis in June of the following year. This report covers the period 1 January 2025 - 31 December 2025. This period matches the reporting period for Colt's financial reporting.</p> <p>This report is published on Colt's website.</p> <p>For more information, please contact: ESGTeam@colt.net</p>
	2-4 Restatements of information	<p>Restatements on Colt Group GHG emissions reported in 2025:</p> <p>Spend-based calculations in Scope 3 for Colt (2019, 2023 and 2024) were restated due to an update on emission factors. We have moved from EEIO provided by the Carbon Trust to CEDA emission factors.</p> <p>Colt Group GHG emissions calculations were revisited to account for the divestment of eight Lumen EMEA data centres at the end of 2025 as well as the correction of the inflation rate applied within the rebaseline exercise done in 2024 due to Lumen EMEA acquisition and improved data quality.</p>
	2-5 External assurance	External Assurance Statement

GRI Standard	Disclosure	Location/Direct Answer
<p>GRI 2: General Disclosures 2021</p>	<p>2-6 Activities, value chain and other business relationships</p>	<p><u>About Colt and Colt DCS</u></p> <p>Colt operates in the telecommunications and digital infrastructure sector. We provide network and voice services, including optical, ethernet, cloud, cybersecurity, capital markets, business internet and VPN, and voice. For more information, see the <u>Colt Product Portfolio</u>.</p> <p>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 <u>Colt DCS Product Portfolio</u>.</p> <p>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, see <u>Colt Partners</u>.</p> <p>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 become engaged and connected citizens.</p> <p>Since the prior reporting period, Colt has undergone significant operational and value chain changes, including the continued integration of the Lumen EMEA business, workforce restructuring linked to transformation and automation programmes, the divestment of eight European data centres, and shifts in supplier and partner relationships. These changes reflect Colt’s transition towards a simplified, digitally enabled operating model and a more focused asset portfolio.</p> <p>Colt Group’s value chain spans upstream suppliers, internal operations and downstream customers. In the upstream segment, third-party partners extract and supply the raw materials and commodities required for the manufacturing and assembly of electronic equipment, as well as the construction materials used in our buildings, data centres and physical assets. We work with more than 5,000 suppliers operating across over 55 countries to deliver key components of our business, including colocation services, network infrastructure, and voice services and telephony.</p> <p>Downstream, we operate as a business-to-business provider, serving customers across the technology, financial and public sectors. Our end-of-life segment activities include third-party transport, re-use and/or disposal of our operational waste and electrical and electronic waste.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 2: General Disclosures 2021	2-7 Employees	<p>Cultivating Top Talent</p> <p>Data tables: Total number of full-time and part-time employees, and a breakdown by gender and by region</p> <p>Data tables: Total number of permanent and temporary employees, and a breakdown by gender and by region</p> <p>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, 2025.</p>
	2-8 Workers who are not employees	<p>Contractors ongoing, Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy, are excluded from the total number count.</p> <p>Omission: Information incomplete due to lack of data granularity.</p>
	2-9 Governance structure and composition	<p>Upholding Corporate Governance</p> <p>For more information, including information on our committees, please see Our Leadership Team.</p>
	2-10 Nomination and selection of the highest governance body	<p>Colt's shareholders appoint directors of the Board, which is the highest governance body of Colt Group. In selecting Board members, consideration is given to a range of factors including professional experience, industry knowledge, leadership capability and diversity of perspectives to support effective oversight of the company's strategy, performance and operations.</p> <p>Board members bring a broad range of professional and industry experience, including financial, operational and technology related expertise, to support effective oversight of Colt's strategy and operations. This range of experience supports informed decision making on issues relevant to Colt's business and its sustainability priorities.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 2: General Disclosures 2021	2-11 Chair of the highest governance body	<u>Michael Wilens</u> 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.
	2-12 Role of the highest governance body in overseeing the management of impacts	<p><u>Upholding Corporate Governance</u></p> <p>As per the latest consolidated financial statements filed at <u>Companies House</u>.</p> <p>Colt's ESG Steering Committee supports management oversight of sustainability due diligence processes, including the implementation of sustainability policies and monitoring of environmental, social and governance impacts across operations and the value chain.</p>
	2-13 Delegation of responsibility for managing impacts	<p>As per the latest consolidated financial statements filed at <u>Companies House</u>.</p> <p>The Board of Colt Group Holdings Limited oversees Colt's impacts on the economy, environment and people. It delegates impact management to senior executives via the ESG Steering Committee, co-chaired by the CEOs of Colt and Colt DCS.</p> <p>Impact-related responsibilities are embedded within functional teams, including sustainability, compliance, procurement, human resources and information security.</p> <p>Senior executives and functional leads report ESG risks, impacts and performance through established governance processes. The ESG Steering Committee meets at least twice per year and provides updates that support Board oversight.</p>
	2-14 Role of the highest governance body in sustainability reporting	<p>Information included in the report is compiled by relevant internal teams. Draft disclosures and supporting data are reviewed through internal validation processes before being consolidated into the report. Subject-matter experts across the organisation review the draft and confirm the accuracy, completeness and consistency of the information prior to its circulation within senior leadership. The Executive Leadership Team, Colt DCS Senior Leadership Team (SLT) and the ESG SteerCo provide the final approval of the Sustainability Report before publication.</p>

GRI Standard	Disclosure	Location/Direct Answer
<p>GRI 2: General Disclosures 2021</p>	<p>2-15 Conflicts of interest</p>	<p>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 2025, we made several updates to our Code of Business Conduct, including additional guidance on fraud prevention as well as providing clarity on how to report actual or suspected breaches of the Code.</p>
	<p>2-16 Communication of critical concerns</p>	<p>Colt Group has established a comprehensive whistle-blowing system. Our employees are encouraged to report any actual or suspected breaches of the Code of Business Conduct to the Ethics Committee, the DCS Governance Committee, the Business Ethics Line or to line managers, at the earliest opportunity, even if the nature or severity of the concern is in doubt. No person reporting a suspected violation will be subject to retaliation because of a good faith report. Anonymous reporting is available wherever permitted by local law.</p> <p>The Colt Ethics Committee and Colt DCS Governance Committee report quarterly to the Audit Committee and DCS Audit Committee respectively. These reports cover breaches or suspected breaches raised directly to the committees or via the Business Ethics Hotline, in relation to the Code of Business Conduct. Reason for omission – 2-16(b): Specific information on critical concerns that were communicated to the Board are not externally communicated due to confidentiality constraints.</p>
	<p>2-17 Collective knowledge of the highest governance body</p>	<p>As per the latest consolidated financial statements filed at Companies House.</p> <p>Colt has mechanisms to maintain an environmentally competent board, such as consulting regularly with an internal, permanent, subject-matter-expert working group, engaging regularly with external stakeholders and experts on environmental issues and attending regular trainings on environmental issues, evolving standards and best practices.</p>
	<p>2-18 Evaluation of the performance of the highest governance body</p>	<p>Reason for omission: As Colt Group is a private company, this requirement is not applicable; therefore, there is no obligation to fulfil this requirement.</p>
	<p>2-19 Remuneration policies</p>	<p>As per the latest consolidated financial statements filed at Companies House. Information on remuneration for key management personnel is provided in Colt Group Holdings Limited's Annual Report (Section 4 – Key Management Personnel Compensation).</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 2: General Disclosures 2021	2-20 Process to determine remuneration	As per the latest consolidated financial statements filed at Companies House . Reason for omission – 2-20: Specific information on the process to determine remuneration is not externally communicated due to confidentiality constraints.
	2-21 Annual total compensation ratio	Omission: Confidentiality reasons.
	2-22 Statement on sustainable development strategy	Our ESG Direction
	2-23 Policy commitments	<p>Trust and Accountability</p> <p>Our policy commitments have been approved by our CEOs. Our suppliers are also aware of our commitments.</p> <p>Policy commitments can be seen in:</p> <ul style="list-style-type: none"> Responsible Value Chain Human Rights Code of Business Conduct Supplier Code of Conduct Partner Code of Conduct Certifications <p>As stated in our Code of Business Conduct, Colt upholds the fundamental human rights set out in the ILO conventions (1998) and requires employees to ensure the Company complies with these principles, covering freedom of association and recognition of collective bargaining, elimination of forced or compulsory labour, effective abolition of child labour, and elimination of discrimination in employment and occupation. Our Supplier Code of Conduct mirrors the ethical expectations in our Code of Business Conduct. All new suppliers must meet Colt's policy and revised due diligence requirements.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 2: General Disclosures 2021	2-24 Embedding policy commitments	<p>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.</p> <p>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.</p> <p>All Colt Group employees must complete annual mandatory training about the Code of Business Conduct.</p>
	2-25 Processes to remediate negative impacts	<p>Commitments to cooperate in the remediation of negative impacts are addressed within our code of Business Conduct. 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.</p> <p>Where negative impacts are identified, Colt undertakes internal investigations to understand the nature and root causes of the issue and determine appropriate corrective actions. Remediation measures may include operational improvements, updates to policies or procedures, additional employee training, or disciplinary or contractual actions where relevant. Colt may also engage with affected stakeholders, where appropriate, to support the resolution of impacts and to help prevent recurrence.</p>
	2-26 Mechanisms for seeking advice and raising concerns	<p>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 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 report 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.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 2: General Disclosures 2021	2-27 Compliance with laws and regulations	<p>Colt is committed to high legal and ethical standards. It is not our policy to merely comply with the letter of the law, but rather to instill 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.</p> <p>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.</p> <p>Reason for omission: Specific information on significant incidents of non-compliance with laws and regulations are not externally communicated due to confidentiality constraints.</p>
	2-28 Membership associations	<p>In 2025, Colt Group participated in several associations and organisations, including European Data Centre Association (EUDCA), TechUK, the Global Enabling Sustainability Initiative (GeSI), Metro Ethernet Forum (MEF), United Nations Global Compact (UNGC).</p>
	2-29 Approach to stakeholder engagement	<p><u>Our ESG Direction</u></p> <p>Approach: Colt identifies key stakeholders using the Wates Principles, based on their influence on and relevance to the business. The main stakeholder groups are customers, employees, board/owners, contractors & suppliers, industry peers and communities.</p> <p>Purpose of engagement: To gather insights, understand expectations, support decision-making and strengthen long-term relationships.</p> <p>How we ensure meaningful engagement: We use structured, two-way engagement channels tailored to each stakeholder group including customer feedback programs, employee surveys and leadership communication, governance reporting to owners, supplier engagement programs, industry association participation and community outreach activities. These channels provide ongoing input, enable dialogue and ensure stakeholders' perspectives inform our strategy, operations and performance.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 2: General Disclosures 2021	2-30 Collective bargaining agreements	<p>Labour Relations</p> <p>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. 34% of employees are covered by collective bargaining agreements.</p>
GRI 3: Material Topics 2021	3-1 Process to determine material topics	<p>Our ESG Direction</p> <p>Double Materiality Assessment</p>
	3-2 List of material topics	<p>Our ESG Direction</p> <p>Double Materiality Assessment</p> <p>The topics of water and biodiversity are absent from this report as these were deemed as not material as a result of the DMA.</p> <p>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.</p> <p>As per biodiversity, new designs consider biodiversity impacts and most data centre constructions occur on brownfield sites.</p>
GRI 201: Economic Performance 2016	3-3 Management of material topics	<p>Managing Enterprise Risks</p> <p>Please reference the GRI index information GRI 305: Emissions 2016 for further information on this topic.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	<p><u>Managing Enterprise Risks</u></p> <p>Colt Group's related risk assessments cover 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.</p> <p>For further information, please refer to our Climate-related Financial Disclosures (CFD) in 2025 financial statements to be filed at Companies House.</p>
GRI 205: Anti-corruption 2016	3-3 Management of material topics	<p><u>Maintaining Ethical Business Conduct</u></p> <p>Anti corruption is a material topic for Colt due to the nature of its operations and global business relationships, with no material negative impacts identified in the DMA.</p>
	205-2 Communication and training about anti-corruption policies and procedures	<p>In addition to mandatory annual Code of Business Conduct training, Anti-Bribery and Corruption (ABC) training is communicated and assigned to 100% of Colt and Colt DCS governance body members and employees across all regions and employee categories. Our anti-corruption policies and procedures are communicated to all relevant business partners across all regions, with 85.4% of suppliers having accepted Colt's Supplier Code of Conduct. All governance body members receive ABC training, and all employees across every category and region also complete this training. ABC training is included in the mandatory training programme on an annual basis.</p>
GRI 305: Emissions 2016	3-3 Management of material topics	<p><u>Our path to net-zero</u></p> <p>Colt's material impacts on emissions relate to our operations and our value chain. The main actual negative impact is the generation of Scope 1, 2 and 3 emissions, which contribute to climate change.</p>
	305-1 Direct (Scope 1) GHG emissions	<p><u>Scope 1 & 2 GHG emissions</u></p> <p><u>Data tables: Colt Group GHG emissions</u></p> <p>Colt Group has an intranet area for employees explaining our baseline emissions, progress and roadmap for reduction. We believe that communicating this information internally has a positive impact on our carbon roadmap.</p> <p>We have prepared our organisational GHG emissions in accordance with the GHG Protocol, reporting CO₂-equivalent values inclusive of all relevant GHGs.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 305: Emissions 2016	305-2 Energy indirect (Scope 2) GHG emissions	<p>Scope 1 & 2 GHG emissions</p> <p>Data tables: Colt Group GHG emissions</p> <p>Colt Group has an intranet area for employees explaining our baseline emissions, progress and roadmap for reduction. We believe that communicating this information internally has a positive impact on our carbon roadmap.</p> <p>We have prepared our organisational GHG emissions in accordance with the GHG Protocol, reporting CO₂-equivalent values inclusive of all relevant GHGs.</p>
	305-3 Other indirect (Scope 3) GHG emissions	<p>Scope 3 GHG emissions</p> <p>Data tables: Colt Group GHG emissions</p> <p>Colt Group has an intranet area for employees explaining our baseline emissions, progress and roadmap for reduction. We believe that communicating this information internally has a positive impact on our carbon roadmap.</p> <p>We have prepared our organisational GHG emissions in accordance with the GHG Protocol, reporting CO₂-equivalent values inclusive of all relevant GHGs.</p>
	305-5 Reduction of GHG emissions	<p>A closer look at our emissions</p> <p>Data tables: Colt Group GHG emissions</p>
GRI 302: Energy 2016	3-3 Management of material topics	<p>Our path to net-zero</p> <p>Colt's material impacts on energy use are connected to own operations, upstream and downstream value chain. The identified actual negative impact stems from energy demand within our operations, such as data centres, and the use of non-renewable energy sources to meet demand.</p>
	302-1 Energy consumption within the organisation	<p>Electricity consumption</p> <p>Data tables: Energy consumption</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 302: Energy 2016	302-4 Reduction in energy consumption	Electricity consumption
GRI 306: Waste 2020	3-3 Management of material topics	<p data-bbox="1142 592 1402 624">Circularity & Waste</p> <p data-bbox="1142 658 3132 776">We have formalised policies through our Waste Management Procedure, Duty of Care (Waste Control) Procedure and WEEE Disposals 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.</p> <p data-bbox="1142 810 3132 924">Waste is a material topic for Colt due to waste and e waste generated across our operations and value chain, which can pose environmental and resource use risks. Colt also contributes to positive impacts through initiatives that extend the life of network equipment and support circular resource use.</p>
	306-1 Waste generation and significant waste-related impacts	Circularity & Waste
	306-2 Management of significant waste-related impacts	<p data-bbox="1142 1119 1402 1151">Circularity & Waste</p> <p data-bbox="1142 1185 3165 1301">Colt works with third parties to manage waste generated in our own activities. Duty of Care (Waste Control) procedure defines the process to ensure third parties manages the waste in accordance with legal requirements. The processes used to collect and monitor waste-related data is described in 306-3.</p>
	306-3 Waste generated	<p data-bbox="1142 1369 1402 1401">Circularity & Waste</p> <p data-bbox="1142 1435 1469 1467">Data tables: Waste data</p> <p data-bbox="1142 1500 3165 1701">In 2023, we improved the standardisation of waste data from our operations in Europe and also from our Investment Recovery Partners. We continue to work on the standardisation 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 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.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 306: Waste 2020	306-4 Waste diverted from disposal	<p>Circularity & Waste</p> <p>Data tables: Waste data</p> <p>Comments on Disclosure 306-3 also applicable.</p> <p>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.</p>
	306-5 Waste directed to disposal	<p>Circularity & Waste</p> <p>Data tables: Waste data</p> <p>Comments on Disclosure 306-3 also applicable.</p> <p>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.</p>
GRI 308: Supplier Environmental Assessment 2016	3-3 Management of material topics	<p>Our path to net-zero</p> <p>Supplier engagement and collaboration for decarbonisation</p> <p>Colt's material impact in this area relates to our upstream suppliers. The main actual positive impact is increased environmental performance and transparency driven by Colt's engagement with suppliers on ESG expectations. This engagement supports reduced environmental footprint and strengthened environmental practices across the supply chain.</p>
	308-1 New suppliers that were screened using environmental criteria	<p>Our path to net-zero</p> <p>Supplier engagement and collaboration for decarbonisation</p> <p>Data tables: Supplier management</p> <p>Partial omission: Additional details regarding supplier assessment results and impacts is not disclosed due to information not being available due to confidentiality constraints.</p>

GRI Standard	Disclosure	Location/Direct Answer
<p>GRI 401: Employment 2016</p>	<p>3-3 Management of material topics</p>	<p>Employment is a material topic for Colt due to our impact on employees across our operations and value chain. Colt's practices support positive impacts related to secure employment, fair pay, employee wellbeing and respect for freedom of association. Potential negative impacts may arise to the possibility of compromising employees' right to privacy in the event of a data breach.</p> <p>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.</p> <p>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.</p> <p>The information in our Talent, Culture and Belonging section features our additional policies or commitments, actions taken to address our impacts, our processes to track effectiveness of our actions, and our stakeholder engagement connected to our actions.</p>
	<p>401-1 New employee hires and employee turnover</p>	<p><u>Workforce at-a-Glance</u></p> <p><u>Data tables: Total number and rate of new employee hires and turnover during the reporting period, by gender and region</u></p> <p><u>Data tables: Total number and rate of new employee hires and turnover during the reporting period, by gender and age group</u></p>
	<p>401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees</p>	<p><u>Talent, Culture and Belonging</u></p> <p>Reason for omission: Colt Group is a private company and does not offer stock ownership, therefore, the 401-2(a)(vi) requirement is not applicable.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 403: Occupational Health and Safety 2018	3-3 Management of material topics	<p>Promoting health, safety and wellbeing</p> <p>Material impacts primarily relate to employees and contractors within Colt's operations. Potential negative impacts may arise from workplace hazards associated with activities including lone working, confined space entry, electrical work and ergonomic strain.</p> <p>Health and safety matters discussed with employee representatives through relevant engagement forums, including Health and Safety Committees where applicable.</p>
	403-1 Occupational health and safety management system	<p>Promoting health, safety and wellbeing</p> <p>Colt's occupational health and safety management system covers all employees and workplaces except Japan, where the management system is managed in accordance with local legal requirements. The DCS management system covers all workers, activities and workplaces globally.</p>
	403-2 Hazard identification, risk assessment, and incident investigation	<p>Promoting health, safety and wellbeing</p> <p>Employees and contractors may report health and safety concerns, hazards or incidents through established internal reporting channels, including line management and health and safety representatives. Workers may remove themselves from work situations they believe present a serious risk to health or safety without fear of retaliation.</p>
	403-3 Occupational health services	<p>Promoting health, safety and wellbeing</p> <p>Colt provides occupational health services such as health checkups, vaccination campaigns, mental health support and health and safety training, to ensure the quality of these services. 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.</p>

GRI Standard	Disclosure	Location/Direct Answer
<p>GRI 403: Occupational Health and Safety 2018</p>	<p>403-4 Worker participation, consultation, and communication on occupational health and safety</p>	<p><u>Promoting health, safety and wellbeing</u></p> <p>While a Health and Safety Steering Committee (SteerCo) runs the overall governance of Colt's Occupational Health and Safety Management System (OHSMS), employee 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 committees are held on a quarterly basis and represent all workers of a specific site or country.</p> <p>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.).</p> <p>Health and safety is communicated at the global and local level in accordance with OHSMS needs. A Health and Safety Portal is available to all employees where all the required health and safety information and guidance is available for public consultation, including risk assessments, procedures, training and guidance documents.</p> <p>In Europe, health and safety provisions are included in applicable Collective Bargaining Agreements and vary by country.</p>

GRI Standard	Disclosure	Location/Direct Answer
<p>GRI 403: Occupational Health and Safety 2018</p>	<p>403-5 Worker training on occupational health and safety</p>	<p>Colt Group employees receive the corresponding health and safety training in accordance with the competency needed for their involvement in the OHSMS. 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 provided and different awareness activities are done as part of the health and safety management of third parties and especially for the riskiest activities when working at Colt Group sites.</p> <p>A training matrix exists as part of our OHSMS training procedure. It includes:</p> <ul style="list-style-type: none"> • A compulsory training programme for any new joiner in accordance with country regulations and 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.
	<p>403-6 Promotion of worker health</p>	<p><u>Employee wellbeing</u></p> <p>Occupational Health Services are offered according to health and safety legal requirements in various countries. These services include, but are not limited to, initial and periodical medical check-ups and seasonal flu vaccinations.</p> <p>Additionally, Colt offers private medical insurance as social benefit and an Employee Assistance Programme that includes psychological support services.</p> <p>Finally, a variety of health promotional activities are conducted in different countries as part of broader wellbeing initiatives to address physical and mental-health related risks (e.g. workshops, mindfulness sessions), and an awareness programme concerning menopause is also provided.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 403: Occupational Health and Safety 2018	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	To address supplier safety risks and associated health hazards, Colt's suppliers are expected to comply with our 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. Additionally, Colt has actions regarding customer health and safety which are integrated into HSE policy. Each site where customers may visit has its 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 on our sites (including customer incidents). Also, customers may raise any query/concern using the standard customer support service .
	403-8 Workers covered by an occupational health and safety management system	All 6,271 employees (100%) 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. There have been no workers excluded from this disclosure. As the percentage is 100%, this data was compiled by including the total number of Colt Group employees.
	403-9 Work-related injuries	<p>Promoting health, safety and wellbeing</p> <p>Data tables: Work-related injuries: In 2025, Colt experienced 0 high-consequence work-related injuries.</p> <p>Partial reason for omission: We do not have data available for workers who are not employees, but whose work and/or workplace is controlled by the organisation.</p> <p>For work-related hazards requirement please refer to disclosure '403-2 Hazard identification, risk assessment and incident investigation'.</p>
	403-10 Work-related ill health	<p>Promoting health, safety and wellbeing</p> <p>Data tables: Work-related ill-health</p> <p>Partial reason for omission: We do not have data available for workers who are not employees, but whose work and/or workplace is controlled by the organisation.</p> <p>For work-related hazards requirement please refer to disclosure '403-2 Hazard identification, risk assessment and incident investigation'.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 404: Training and Education 2016	3-3 Management of material topics	<p><u>Training and professional development</u></p> <p>Colt's material impact on employee development relates to the workforce within our own operations. A key potential positive impact arises from the training and skills development opportunities Colt provides, including access to internal and external learning resources and support for internal mobility. These initiatives help employees build essential skills and strengthen leadership capabilities.</p>
	404-1 Average hours of training per year per employee	<p><u>Training and professional development</u></p> <p>Data tables: Employee training</p>
	404-2 Programmes for upgrading employee skills and transition assistance programmes	<p><u>Training and professional development</u></p> <p>Colt leverages platforms such as LinkedIn Learning (Core, DCS and the new DCS environment), Percipio, Colt Excel e-learnings and technical training to enhance employee skills across technical, behavioural and leadership areas. Examples include: Change Management & Resilience, neuroinclusion, crisis management, English language training, Managing@Colt, Leading the Colt Way, Stepping into Leadership, Aspire to Lead, Leadership Impact Accelerator, Ascending the Leadership Summit, Hiring Best Practices, Mastering the Art of Feedback, Meaningful Performance Conversations, 1:1 coaching, Mental Health for Managers, Management Matters, team integration workshops, MEDDPIC and Ways of Working sessions, Connection+ learning sessions, Continuous Learning sessions and Learning at Work Week.</p> <p>Data tables: Employee training</p>
	404-3 Percentage of employees receiving regular performance and career development reviews	Data tables: Performance reviews

GRI Standard	Disclosure	Location/Direct Answer
<p>GRI 405: Diversity and Equal Opportunity 2016</p>	<p>3-3 Management of material topics</p>	<p><u>Diversity, equity and inclusion</u></p> <p>Colt's material impacts on diversity, inclusion and equal opportunity relate to our own operations and downstream value chain actors. Colt's practices support positive impacts through inclusive workplace initiatives and zero tolerance approaches to discrimination, while potential negative impacts may arise where approaches to the accommodation of people with disabilities are not applied consistently.</p> <p>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 Ethics 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.</p> <p>In 2025, Colt's UK mean gender pay gap for hourly pay was 17.6%, an increase of 0.6 percentage points compared to 2024. This movement reflects changes in pay quartile distribution and the continued integration of Lumen EMEA following the 2023 acquisition. The median gender pay gap reduced by 1.1 percentage points, indicating an improvement in pay outcomes at the midpoint of the organisation. The mean bonus gap favoured women, influenced by a small number of senior female leaders based in the UK. As a globally distributed organisation, the geographic location of senior leaders has a material impact on UK data. The median bonus gap favoured men, reflecting the higher proportion of men in UK sales roles where total remuneration is more heavily weighted towards variable pay. Full details are available in Colt's 2025 UK Gender Pay Gap Report and the 2025 UK Gender Pay Gap Report for Lumen UK.</p> <p>In Spain, Barcelona Shared Service Centre's salary gap in 2025 was 2.84% (compared to 2.48% in 2024) and for Colt Spain it was 7.78% (compared to 6.72% in 2024). We formally registered our Gender Equality Action Plan to the Spanish Labour Authority and maintain our commitment with the Diversity Charter. In 2025, Colt in Spain arranged mentorships for female STEM students and continued to make efforts to attracting female candidates to mostly male dominated roles.</p>
<p>405-1 Diversity of governance bodies and employees</p>	<p>405-1 Diversity of governance bodies and employees</p>	<p><u>Diversity, equity and inclusion</u></p> <p><u>Upholding Corporate Governance</u></p> <p><u>Data tables: Board composition</u></p> <p>Reason for partial omission: information incomplete due to confidentiality reasons.</p>

GRI Standard	Disclosure	Location/Direct Answer
GRI 414: Supplier Social Assessment 2016	3-3 Management of material topics	Responsible Value Chain Colt's material impacts on responsible social supply chain practices relate to our supplier network in the upstream value chain. The identified actual positive impact arises from Colt's engagement with suppliers on ESG matters, which supports reduced environmental footprints, improved social performance and greater transparency across the supply chain.
	414-1 New suppliers that were screened using social criteria	Responsible Value Chain Data tables: Supplier environmental and social assessment Partial omission: Additional details regarding supplier assessment results and impacts is not disclosed due to information not being available due to confidentiality constraints.
	414-2 Negative social impacts in the supply chain and actions taken	Responsible Value Chain Colt works with suppliers globally to support the delivery of our services and recognises that social risks, such as labour practices and human rights issues, may arise within complex supply chains. Through our Supplier Code of Business Conduct and procurement processes, Colt sets expectations for suppliers on responsible business practices and screens suppliers through risk management and sustainability assessment processes. During the reporting period, Colt did not identify any systemic negative social impacts in our supply chain that required formal remediation actions. Where potential risks are identified, Colt engages with suppliers to encourage alignment with our standards and address issues in accordance with our procurement and compliance policies.
GRI 418: Customer Privacy 2016	3-3 Management of material topics	Upholding cybersecurity and data privacy Colt's material impacts on data privacy and security relate to our own operations and the customers and partners that depend on our digital infrastructure and services. Colt's practices support positive impacts by enabling secure digital operations and protecting customer information, while potential negative impacts may arise from risks related to data protection and information security.
	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Reason for omission: confidentiality constraints.