Corporate Social Responsibility **at Eurofiber**

eurofiber

This report is based on the CSR information of Eurofiber in the CSR Register. The information in this report has been verified by FIRA Sustainability. The assurance statement is included in this report.

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Company Profile

Eurofiber has been a provider of industry-leading open digital infrastructure since 2000. Utilizing our own fiberoptic network and datacenters, we provide cloud infrastructure and connectivity solutions to companies, government bodies and non-profit organizations.

Vision

Technology has become an integral part of modern society. Various digital transformations are taking place at the same time at lightning speed. Sustainably generated energy demands efficient distribution networks, vehicles are increasingly connected to the roads on which they drive, connected cities are striving for a higher quality of life for the growing number of residents, the circular economy demands intelligent production processes and healthcare requires IT solutions to make doctors and surgeons work more efficiently. Today's societal challenges call for tomorrow's digital solutions. This is based on an open, future-proof digital infrastructure. It is our vision that people and organizations should be free to enjoy the unlimited possibilities of a connected digital society.

Mission

As the engine of the digital society, our open infrastructure plays a vital role in unleashing the full potential of people and organizations. We provide smart, open, future-proof cloud and connectivity solutions to companies, government bodies and non-profit organizations. Customers have complete freedom to choose the services, applications and providers they need, allowing them to tap into the full potential of digital innovation.

Core Values

At Eurofiber the core values excellence, collaboration, freedom and dynamism serve as our shared guidelines.

View on Corporate Social Responsibility

Eurofiber has a leading role in society in the field of digital infrastructure. We believe that this entails a broader responsibility and we believe in sustainable growth for our own organization, our employees and society as a whole. Our CSR policy extends from sustainable production, the welfare of employees and society to climate change mitigation and enthusing girls for a study program and career in technology.

CSR Declaration

Scope for CSR Register

Operation and maintenance of fiberoptic networks by Eurofiber Nederland B.V. (chamber of commerce 34134377) in The Netherlands and Eurofiber N.V in Belgium. Rental of datacenter space, ICT services related to connectivity and datacenters by Dataplace B.V in The Netherlands. Eurofiber Holding and sister companies are not in scope.

Our Commitment

As Eurofiber Holding B.V. we recognize the importance of social responsibility and we are dedicated to ensure the interest of our clients, employees, shareholders and society through practical practices on Corporate Social Responsibility (CSR).

We subscribe to the principles of social responsibility. We commit to:

- **Accountability:** be accountable for our impacts on society, the economy and the environment;
- **Transparency:** be transparent in our decisions and activities that have impact on society and environment;
- **Ethical behavior:** engage in ethically behavior at all times;
- **Respect for stakeholder interest:** respect, consider and respond to the interest of our stakeholders;
- **Respect the rule of law:** accept that respect for the rule of law is mandatory;
- **Respect for international norms of behavior:** respect international norms of behavior, while adhering to the principle of respect for the rule of law;
- **Respect for human rights:** respect human rights and recognize both their importance and their universality.

We commit to inventory our material CSR issues, establish clear objectives and targets, develop and maintain social responsibility programs and management systems, and dedicate sufficient resources to respond to these principles. Management and employees are expected to contribute to this policy.

We will review our values, CSR strategy and performance annually to ensure that our commitments are in line with our forward thinking.

We will work with the CSR Register to provide our clients with reliable data on our CSR programs.

Maarssen, 15 March 2021

Eric Kuisch
Chief Operating Officer

CSR Program

The CSR Program contains the operational strategy of Eurofiber for the most relevant CSR issues. Detailed descriptions of the Policies, Measures and Certificates mentioned here can be found in the relevant chapters below.

Human Rights

Work for Vulnerable Groups (Social Return)

Ambition: Developing a comprehensive program across Eurofiber in 2021 for creating work for vulnerable groups that includes ambitions, KPI's and planning.

Objectives: Vulnerable groups Belgium: By the end of 2021 we want to develop a similar approach in Belgium towards vulnerable groups. We want to employ at least 1 person with a distance to the labor market.

CSR Measures: RefugeeForce

Management Review: In 2019 Eurofiber issued an exploratory memo about creating work for vulnerable groups. In 2020 we started to convert this into a comprehensive program which will continue in 2021. In 2021 we also want to start a similar program for Belgium.

Labor

Contracts and Social Obligations

Ambition: Eurofiber complies with legislation and regulations in the field of contracts and social obligations, and works with contractors and suppliers who are also committed to this.

Objectives: Audit: Eurofiber wants no discrepancy between its own reporting versus the audit. Preferred contractors: Contracts with our main contractors explicitly state that they must comply with national legislation and regulations in the field of payroll tax and social contributions.

CSR Measures: Audit, Inclusion Supplier Code of Conduct.

Management Review: We are satisfied with our current approach.

Health & Safety at Work

Ambition: Eurofiber wants to offer its employees an inspiring, safe and healthy working environment. We want to create and maintain a culture in which awareness of safety risks is high and people discuss matters in the field of prevention and mitigation of risks. Furthermore, Eurofiber has ambitions to develop a policy in the field of absenteeism (including absenteeism due to psychosocial workload), its

prevention and the further development of a vital corporate and safety culture. Partly as a consequence of the COVID-19 developments, extra attention will also be given to ergonomics both in the office and at the home workplace. A safe work culture for our contractors, and their subcontractors, is just as important to us. We focus on safety management throughout the chain.

Objectives: Absenteeism rate of 4 percent: Eurofiber has a continuous target on average absenteeism rate. Eurofiber aims for a percentage lower than 4 percent. RI&Es: All Eurofiber business units have a verified RI&E in place. Chain RI&Es: RI&Es for our contractors who build and maintain our network, as well as for customers visiting our server rooms. PSA failure rate less than 2 percent: Eurofiber has a continuous objective to keep the dropout due to psychosocial workload (PSA) below 2 percent. VCA certified main contractors: Our main contractors are VCA (Safety, Health and Environment) certified.

Policies: Code of Conduct

CSR Measures: VCA**/ SCC** main contractors, absenteeism.

Certificates: RI&E Safety in the Chain, RI&E Eurofiber business units.

Management Review: An RI&E has been conducted in 2020. We are satisfied with our current approach.

Improvement plans: Increase the amount of VCA main contractors working for Eurofiber Group, define incident KPIs, Eurofiber Group prevention service.

Employability & Human Development

Ambition: Eurofiber wants its employees to develop continuously, so that they remain fully in tune with the rapidly developing company, sector and society.

Objectives: Personal Development Plan (PDP): In 2021, 100 percent of the employees will have a learning curriculum added to their personal development plan. Personal Development: In 2021 in addition to the privacy and security training courses, 80 percent will attend a minimum of 4 additional (online) training courses. Employee Satisfaction: Annual increase of employee satisfaction. In 2021 we want the employee satisfaction score of the Eurofiber group to be at least 7.6..

Policies: Talent Management

CSR Measures: Digital learning environment, employee survey - internal communications.

Management Review: Digital learning tools have been introduced and implemented in 2019. The personal development plans have been implemented in 2020. Our target of the percentage of employees that attends a minimum of 4 additional was not achieved, we will continue to focus on this.

🌱 Environment

Circular Economy

Ambition: As an operator of fiberoptic networks and datacenters, we use considerable quantities of materials and - to a lesser extent - consumables. Wherever possible, we apply the principles of a circular economy, in which the emphasis is on reuse and a longer life span of products. Eurofiber aims to reduce the production of waste products in the chain and encourages its suppliers to be environmentally aware. See the sustainable procurement section of this report.

Objectives: Return rate used modems: Eurofiber will improve its process for returning used modems by its customers. Eurofiber aims at a return rate of 80 percent by 2022.
Eurofiber business units ISO 14001 certified: All Eurofiber business units are ISO 14001 certified to proof environmental legal compliance, insight in environmental aspects and actions to improve.

CSR Measures: Sustainable procurement, return process used modems.

Management Review: We are satisfied with our current approach.

Improvement plans: EPDs for materials, Increase amount of used modems returned.

Energy Efficiency and Renewable Energy

Ambition: Eurofiber aims to further reduce its emissions and CO_2 footprint. Eurofiber is growing; we will use more electricity and gas both in housing our employees, regarding travel, network and datacenters. We wish to ensure that energy usage and CO_2 is not increasing relatively; so not per employee, not per car, not per rack in our datacenters et cetera. And that we take effort in reducing these relative numbers as well. We report on energy usage and CO_2 emissions, including KPIs, to be accountable for the effectiveness of our energy and CO_2 reduction initiatives.

Objectives: Electrical cars: In 2021 Eurofiber will increase the number of electric/hybrid lease cars in our car fleet. Reducing power consumption: Eurofiber aims to reduce the power consumption of its operational and support activities relatively.
100 percent Green power: Eurofiber uses 100 percent 'green' electricity for its offices, datacenters and point of presence (POP) locations.

Policies: Environmental Management Policy Statement.

CSR Measures: Electrical car fleet, Eurofiber Group Energy and CO_2 inventory, 100 percent Green power.

Certificates: ISO 50001

Management Review: A new CO_2 footprint toolkit (by MVO Manager) implemented in 2019. We are satisfied with our current approach.

Fair operations

Sustainable Procurement

Ambition: Eurofiber wants to work closely with its suppliers throughout the value chain on subjects such as improving quality, environmental friendliness, reducing integral costs in the supply chain and reducing the ecological footprint of the materials and products it purchases. We want suppliers (partners) of Eurofiber to underline the same values as Eurofiber, such as acting responsibly and with integrity, communicating openly and transparently.

Objectives: ISO 14001 certified contractors: All contractors responsible for building and maintaining the fiberoptic network and PoP locations to be ISO 14001 certified or intent to be for 2021.

Increase insights: For 80 percent of purchasing expenditure (spend) controlled by Procurement, a transparent overview will be created on possible areas of improvement of the quality, environmental friendliness and reduction of the ecological footprint. As Eurofiber is growing (both organically as by acquisitions) the scope of approach, policies and measures is continuously broadening.

100 percent Supplier Code of Conduct: All new suppliers contracted by Eurofiber with an annual purchase value above EUR 25,000 sign the Eurofiber Supplier Code of Conduct.

Policies: Sustainable Procurement (SRP), Code of conduct Suppliers.

CSR Measures: Sustainable procurement, Spend Analysis, VCA**/ SCC** main contractors, inclusion Supplier Code of Conduct, ISO 14001 Eurofiber contractors for build & maintenance, exclusion of the use of banned chemicals.

Management Review: We are satisfied with our current approach.

Improvement plans: Increase the amount of ISO 14001 certified main contractors working for Eurofiber Group, update sustainable procurement policy (SRP).

Consumer issues

Privacy and Client Data Protection

Policies: As a leading provider of vital fiberoptic networks and datacenter services, Eurofiber considers information security and the protection of personal data as an im portant and integral part of its services. Our Information Security (IS) and Privacy policies apply to the safety of the information and protection of personal data of all stakeholders of Eurofiber and its business units. Our IS policy focuses on the safe, secure, sufficient supply of information and reliable ICT systems and also extends to the protection of non-automated data and company property. Our Privacy policy focuses on dealing with personal data in a safe, honest and transparent manner and being compliant with the GDPR. All external parties processing personal data on behalf of Eurofiber are contractually bound to at least the same level of protection as is set forth in our Privacy policy. All our employees, including temporary staff, are trained on these policies and are contractually bound to comply with them.

Objectives: Improve Security & Privacy awareness across the Eurofiber Group: To improve the Security & Privacy awareness and knowledge across the Eurofiber Group, all employees have access to the security and privacy modules in the Eurofiber Academy. Completing these modules is actively encouraged by the Security & Privacy department and has been made mandatory for all Eurofiber employees. Our goal is the average percentage of completion of the Security & Privacy awareness modules to be 95 percent by the end of 2021.

Policies: Code of Conduct Information Security, Policy Information Security Eurofiber Group, Privacy Policy Eurofiber employees, Privacy Policy Eurofiber Group, Code of Conduct

CSR Measures: Security & Privacy awareness Program.

Certificates: ISAE3402, ISO 27001.

Management Review: We are satisfied with our current approach.

Policies

Overview of relevant policies, translating CSR ambitions into implementation plans and guidelines for employees.

Code of Conduct

The Code of Conduct sets out the fundamental principles and rules which the Eurofiber companies, their employees, managers and executives must observe in their business contacts.

Code of Conduct Information Security

The Code of Conduct Information Security constitutes the elaboration of the Eurofiber established information security policy. This policy sets out how Eurofiber wishes the Eurofiber companies and their employees deal with the security of information.

Code of conduct Suppliers

Eurofiber uses a Supplier Code of Conduct which is part of the standard Master Framework Agreement. This Supplier Code of Conduct is based on the ten principles of the Global Compact of the United Nations. In 2019 Eurofiber has optimized its Supplier Code of Conduct by using the standard created by FIRA.

Environmental Management Policy Statement

Our environmental policy is aimed at:
1) Take effort to decrease our environmental footprint throughout the entire chain of supply,
2) Pursuing complete business integrity in the broadest sense throughout the entire chain of supply, with focus on sustainability and relevant legislation.

Policy Information Security Eurofiber Group

With our Information Security policy, Eurofiber Group wants to emphasize that information security is an essential and inseparable part of Eurofiber's core business. The safety of the information of its clients, employees and suppliers is part of Eurofiber's mission and services. Eurofiber's primary and supporting processes are extremely dependent on the safe, secure, sufficient supply of information and reliable information systems. Information is an important business asset that must be appropriately protected. Appropriate protection means that we ensure guaranteed availability, integrity and confidentiality of the information, now and in the future.

Our information security policy focuses not only on automated data processing using ICT facilities, but explicitly also extends to the protection of non-automated data (such as physical documents) and company property.

Privacy Policy Eurofiber Group

Our Privacy Policy focuses on dealing with personal data in a safe, honest and transparent manner and in a way that Eurofiber is compliant with applicable laws and regulations, such as the GDPR. All external parties working with personal data on behalf of Eurofiber are contractually bound to at least the same level of protection as is set forth in our privacy policy. All our employees, including temporary staff, are trained on these policies and are contractually bound to comply with them.

Privacy Policy Eurofiber employees

The Privacy Policy sets out the fundamental principles and rules which the Eurofiber companies, their employees and hired personnel must observe and know regarding the processing of personal data within Eurofiber.

Sustainable Procurement (SRP)

Eurofiber's socially responsible Procurement policy, which is extracted from and contributes to Eurofiber's central vision of Corporate Social Responsibility, is subdivided into five central themes. These are: Fair and ethical business practices, Environment, Social involvement, Human rights and Working conditions.

By embedding these themes in the existing Procurement process, Eurofiber devotes attention to making the supply chain more sustainable. Eurofiber reviews its potential impact and influence on the supply chain per theme and procurement category.

Talent Management

Eurofiber People Strategy 2020-2025 as defined by the Executive Board in February 2020.

CSR Measures

Overview of concrete measures and programs, illustrating how the CSR strategy is implemented in the organization, including actual performance (impact).

Human rights

RefugeeForce

Eurofiber will remain partner and sponsor of RefugeeForce. RefugeeForce invests in the skilled, motivated, and diverse asylum seeker and status holder population in The Netherlands who struggle to find employment matching their interests, experiences, and ambitions.

Through an intensive Salesforce program, RefugeeForce prepares talented participants with comprehensive technical and professional training, equipping them with the practical skills, knowledge and personal network to flourish in the Dutch technology sector and work at Eurofiber.

In 2020, Eurofiber maintained two workplaces in co-operation with RefugeeForce.

Labor

Audit

Annually, a control mechanism monitors if Eurofiber complies with legislation and regulations in the field of contracts and social obligations. This contributes to reliable accounting and transparency. For the 2020 audit, KPMG was appointed.

Labor
Environment
Fair operations

Inclusion Supplier Code of Conduct

The Eurofiber Supplier Code of Conduct has been included as part of the Master Framework Agreement template since 2016. For all new suppliers contracted by Eurofiber with an annual purchase value above EUR 25,000, this Code is part of the agreement. For prolongations of existing agreements, this is also added to the prolonged agreements.
More than 50 percent of the annual purchasing expenditure in euros is purchased from suppliers where a Supplier Code of Conduct is included in the agreement.

Absenteeism

In addition to the local absenteeism policies, Eurofiber has group-wide actions to monitor the wellbeing of its employees, where we pay focus to both physical complaints as psychosocial workload. During the corona monitor in March 2020, it became apparent that, in addition to the blurring of the work-family boundary, compulsory home-working also meant that workers needed ergonomic aids such as an external screen and an ergonomic office chair. Eurofiber works together with an external party for the office chairs or offer spare chairs from our offices. Eurofiber has set itself the target of making an ergonomic office chair available to everyone both at home as at the office. Eurofiber also gives regularly attention to work-family balance on our internal communication platform DUDE.

The measures taken affect the psychosocial well-being of all our employees, create a better workplace and contribute to a better overall job satisfaction.

Eurofiber aims to have an absenteeism rate under 4 percent which we actively monitor on a monthly basis. For 2020 Eurofiber Belgium had an absenteeism rate of 1.12 percent, Eurofiber Netherlands of 2.80 percent.

Labor

Fair operations

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VCA**/ SCC** main contractors

Eurofiber outsources build and maintenance of the fiberoptic network and PoP locations to a selected number of main contractors. All main contractors must have VCA**/ SCC ** (Safety Checklist for Contractors). It is considered a knock-out criteria. Validity of the contractor is verified by the Operational Quality Manager. Dataplace will align with this policy in 2021 (see improvement plan).

By requiring VCA**/ SCC** from our main contractors, it is ensured, and independently verified, that our constructor execute their work in a safe fashion.

Digital learning environment

The Eurofiber Academy is Eurofiber's digital learning environment, which can be seen as a user-friendly online library where employees can learn quickly, clearly and at their own pace. It gives employees 24/7 access to relevant training modules and tailor-made Eurofiber training courses, such as about our products and services, privacy and security, culture, business ethics and more. Several of these courses are mandatory and part of the onboarding process.

GoodHabitz is an online library with more than 150 courses. The platform offers a variety of courses in improving skills, for example in management, language, writing, presenting, creativity and more.

The courses are accessible to all employees and available in Dutch, English and French.

Since November 2019 all employees have access to digital learning environments related to professional and personal development.

In 2020 91 percent of our employees completed the obligatory trainings on the Eurofiber Academy.

In 2020 49.33 percent of our employees took at least 4 training courses on GoodHabitz, in total 1,023 training courses were completed.

The continuous improvement of the knowledge and competences of our employees is of vital importance to Eurofiber. That is why we continue to set ourselves the target of having 80 percent of our employees continuing their development by following at least 4 GoodHabitz training courses next to the obligatory trainings on the Eurofiber Academy.

Employee survey - internal communications

It is important for our employees to be well informed about the company strategy. They also reported they want to preserve our unique Eurofiber culture. Both topics were implemented in the Eurofiber strategy 2020-2025.

In 2020 employee happiness has increased on Eurofiber Group level to 7.5, compared to 7.2 in 2019 and 7.3 in 2018.

Labor

Environment

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Sustainable procurement

Examples of execution of sustainable procurement policies are:

1. Sustainability as part of RFx process. In the last two years we included Sustainability in our Request for Proposal for catering services and for cleaning, in which Eurofiber emphasizes the great importance of the use of social employment mediation by the supplier and hiring candidates who have been unemployed for a long period of time. For example by hiring so-called social work (SW) candidates who are subsidized by the government or assigned by a SW-company. Eurofiber requests a minimum effort in which 5 percent of the employees should be people who have the greatest distance to the labor market.

2. Purchase of cables takes place via our main contractors. In the framework agreement, they are obliged to purchase cables from TKF (Twentsche Kabelfabriek). According to TKF, only one percent of the production waste ends up in the incinerator, the rest is reused.

In 2020 Eurofiber has mainly used cables from a party that proactively reduces its production waste.

🌱 Environment

Return process used modems

In 2018, Eurofiber included in the contract with its sole supplier of modems that returned products must be reused (refurbished), unless they are defective and phased out. These defective and phased-out products and the electronic waste produced during the process, are destroyed by a Weelabex-certified company. In addition, the CO_2 emissions from the transport of the modems are compensated.
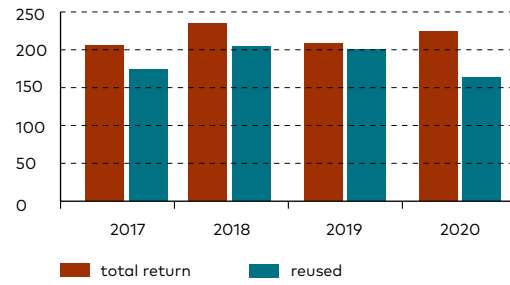
A new metric in 2020 is the percentage of returned modems. To what extend do our customers contribute to this initiative? The return rate was 40 percent in 2019 and 2020. In 2021 our focus will be on how to increase the return rate up to 80 percent in 2022.
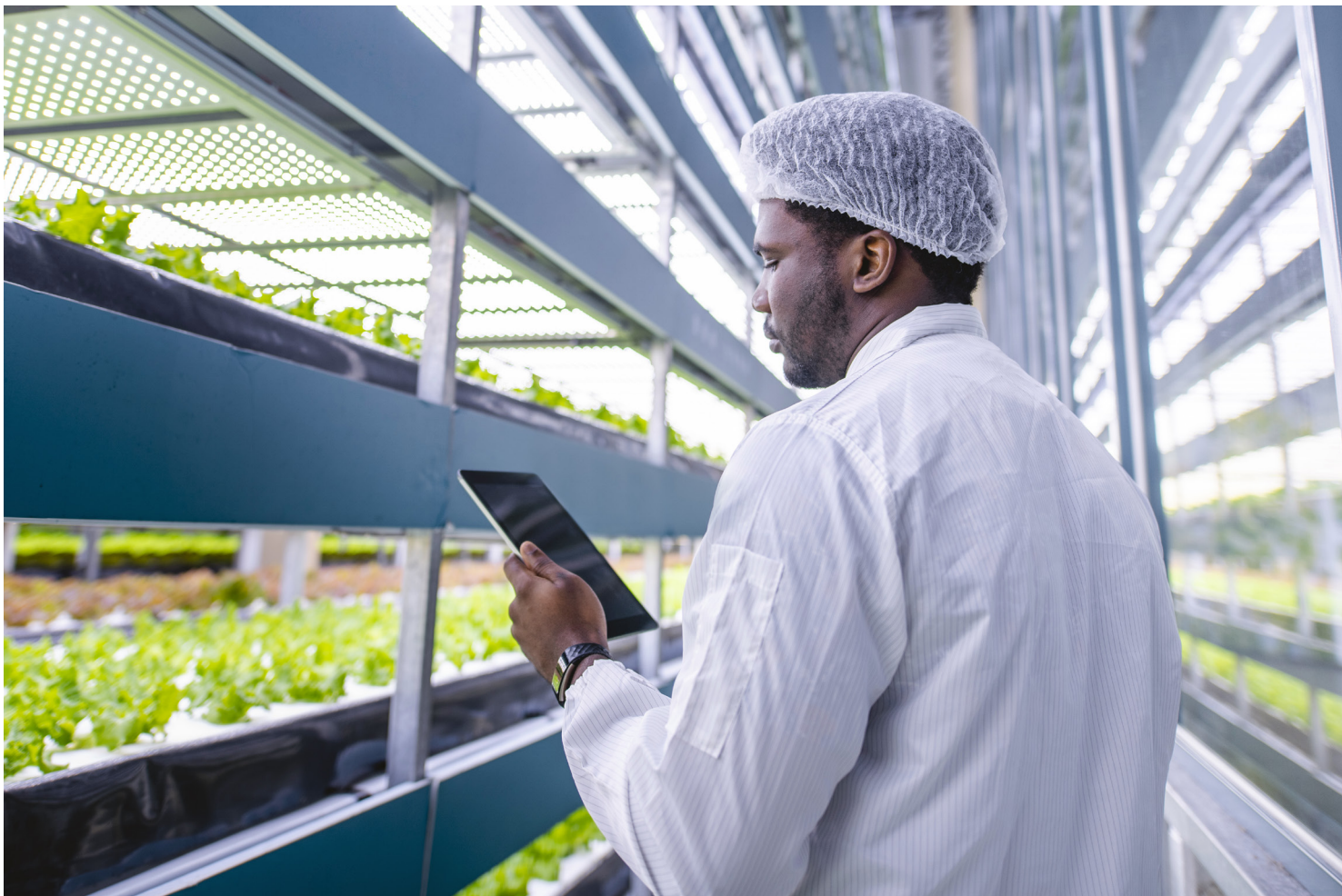
100 percent Green power

Eurofiber Netherlands has chosen to procure 'Hollandse Wind' from Eneco for its office in Maarssen and its 'point of presence' (PoP)-locations. Eurofiber Belgium purchases Green Energy at Electrabel. For the datacenters, Dataplace procures renewable energy generated by Wind Energy in Europe.

In 2020 Eurofiber Netherlands, Eurofiber Belgium and Dataplace used 100 percent green power to reduce CO_2 emissions.

Eurofiber Group Energy and CO_2 inventory

Eurofiber aims to further reduce its emissions and CO_2 footprint. We report on energy usage and CO_2 emissions, including KPIs, to be accountable for the effectiveness of our energy and CO_2 reduction initiatives. In 2020 we expanded our CO_2 footprint reporting with Dataplace and Eurofiber Belgium.

In 2020 we gained insight in effectiveness of current reduction initiatives. In 2021 CO_2 reduction targets will be set.

Electrical car fleet

Eurofiber encourages electric/hybrid driving. In 2020, Eurofiber Netherlands maintained the number of electric/hybrid vehicles of 29 percent in 2019 for 2020 of the total car fleet. Eurofiber Belgium reported 17 percent in 2020, Dataplace 30 percent. Eurofiber's objective is to increase this again in 2021.

This contributes to a reduction in our CO_2 footprint of mobility.

Environment

Fair operations

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ISO 14001 EF contractors for build & maintenance

Eurofiber outsources build and maintenance of the fiberoptic network and PoP locations to a selected number of main contractors. We ask them to take their environmental responsibility and to have an ISO 14001 certified environmental management system in place. ISO 14001 is independent proof that our contractors meet both local and European environmental legislation, gained insight in environmental aspects and take effort to decrease their environmental impact. In 2020 we performed a gap analysis on existing ISO 14001 certificates of our main contractors of Eurofiber in The Netherlands and Belgium. In 2021, ISO 14001 will be added to the RFP and current contracts as knock-out criterium. Validity of certificates is being monitored by Procurement. For Dataplace we will develop a plan in 2021.

Spend Analysis

Eurofiber annually performs a spend analysis with the aim to monitor and/or identify expenditures, supplier landscape, contract landscape and supply risk. Purpose of this analysis is 1. to define our supplier base and spend and 2. Procurement initiatives.

Eurofiber has performed a spend analysis on 2020.

Exclusion of the use of banned chemicals

In 2019 Eurofiber added the SGS Search Cradle to Cradle Certified Banned Chemicals Reporting to its RFPs (where relevant) regarding materials and hardware suppliers. End 2020 the list is a mandatory part of new relevant contracts. As of 2021, the ambition is to also arrange this for existing contracts.

Eurofiber requires in all new relevant contracts that no banned chemicals are used in its supply chain. In relevant cases this is considered as a knock-out criterium.

Community

Security & Privacy awareness Program

As a leading provider of vital fiber optic networks and datacenter services, Eurofiber considers information security and the protection of personal data as an important and integral part of its services.

As a goal to improve the Security & Privacy awareness and knowledge across Eurofiber Group, all employees have access to the security and privacy modules in the Eurofiber Academy. These security and privacy modules are part of the Security & Privacy awareness Program for 2020 and consist of two learning paths within the Eurofiber Academy, each learning path consists of several awareness modules. Completing

these modules is actively encouraged by the Security & Privacy department and has been made mandatory by HR for all Eurofiber employees, to ensure that the protection of information assets and personal data can be guaranteed.

Also part of the Security & Privacy awareness Program is that a quarterly Security newsflash or newsletter is posted on the company intranet.

To improve the Security & Privacy awareness and knowledge across the Eurofiber Group, all employees have access to the security and privacy modules in the Eurofiber Academy.

In 2020 89 percent of all employees completed these mandatory modules in the Eurofiber Academy.

By following up on the percentage of employees who completed the learning path the results for 2020 were as follows.

| | Learning path part 1. | Learning path part 2 |
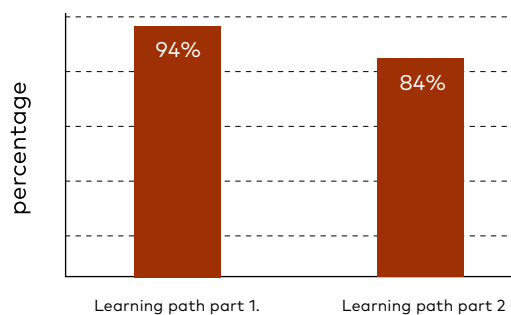
With an average result of 89 percent we believe the Security and Privacy awareness program contributes to the goal to improve the Security & Privacy awareness and knowledge across the Eurofiber Group.

Smart City Challenge for Girls

Eurofiber aims to introduce girls who are in primary school to technology and its applications in their own living environment, in order to interest them in a technical study program.

Together with VHTO and participating cities, Eurofiber organizes Smart City Challenges for Girls. During these challenges around 50 girls develop solutions for smart city issues in their city. The aim of this initiative is to make girls who are in their last and second-last year of primary school enthusiastic about technical study programs and professions.

Because of restrictions related to the COVID-19 pandemic, we had to postpone all three planned events. These will take place in 2021, as soon as the COVID-19 restrictions are lifted.

Volunteer work

Eurofiber makes funding, materials, resources and manpower available to various social initiatives throughout the year. We offer employees the possibility to do two days of volunteer work per year. We regularly encourage or inform our colleagues about volunteer work on our company intranet.

In 2020 we organized a Connect Run for foundation ALS. We also donated cuddle elephants to the children's cancer hospital Bravis and Eurofiber employees spent 188 hours volunteering.

Improvement Plans

Overview of plans to improve or expand the CSR program.

Define Incident KPIs

We have a program in place to ensure an healthy and safe work environment; both for our own employees, as for our contractors. We wish to determine the effectiveness of this program by defining KPIs regarding incidents. And put a process in place to ensure continuous improvement based on the results. Time frame: 31 December 2021

Eurofiber Group prevention service

EF Group prevention service to facilitate Occupational Health & Safety in each part of the organization.
Time frame: 31 December 2021

EPDs for materials

Eurofiber outsources build and maintenance to contractors, asking them to use Eurofiber preselected materials. We wish to take the next step in sustainability in the chain; all material suppliers to consider product lifecycle or in the process of by means of EPDs. Both for contracted as for RFPs. This will enable Eurofiber to actually choose the most sustainable option.
Time frame: December 31 2021

Increase amount ISO 14001 main contractors in Eurofiber Group

Dataplace will investigate whether ISO 14001 for its type of main contractors will initiate the right environmental impact. And thus align with Eurofiber Group policy. And if not, what would be a more suitable alternative for datacenter contractors.
Time frame: 31 December 2021

Increase the amount of VCA main contractors working for Eurofiber Group

Dataplace has the intention to align with Eurofiber Group policy and to ensure the main contractors are VCA certified. Time frame: 31 December 2021

Increase amount of used modems returned

Eurofiber will improve its process for returning used modems by its customers. Eurofiber aims at a return rate of 80 percent by 2022.
Time frame: 31 December 2022

Social return Belgium

A cooperation agreement with an external party to increase the number of workers from vulnerable groups in Belgium. Time frame: 31 December 2021

Update sustainable procurement policy (SRP)

In 2021 Eurofiber will update its sustainable procurement policies.
Time frame: 31 March 2021

Certificates, Product Labels and Assessments

Overview of certificates, product labels and other assessments by independent third parties.

ISAE 3402 - Type 2	Eurofiber has an ISAE 3402 Type II statement. This concerns the fiber network services by Eurofiber in The Netherlands. Dataplace has an ISAE 3402 Type II statement concerning its housing activities for ICT infrastructure.
ISO 14001	Design, management and operation of cable infrastructures and telecom services by Eurofiber Nederland B.V. Providing Housing Services for ICT Infrastructure by Dataplace B.V. These services encompass secured housing, uninterrupted power supply, access- and climate control, connectivity & compute resources
ISO 27001	Information security with regards to the construction, maintenance and exploitation of cable infrastructure and connectivity services regarding the Statement of Applicability (SoA) version 3.6 dated 30 November 2020 by Eurofiber Nederland B.V. As from the certificate issued in December 2020, related to version 3.6 of the SoA, the location of Eurofiber Belgium also became part of the ISO 27001 certification of Eurofiber Nederland B.V. Providing Housing Services for ICT Infrastructure These services encompass secured housing, uninterrupted power supply, access- and climate control, connectivity & compute resources regarding the statement of applicability (SoA) version 1.1 dated 1 September 2020 by Dataplace B.V.
ISO 50001	Dataplace is ISO 50001 certified (Energy Management System). Providing housing services for ICT infrastructure. These services encompass secured housing, uninterrupted power supply, access- and climate control, connectivity & compute resources.

ISO 9001	Design, management and operation of cable infrastructures and telecom services by Eurofiber Nederland B.V.
	Dataplace is ISO 9001 certified. Providing housing services for ICT infrastructure. These services encompass secured housing, uninterrupted power supply, access- and climate control, connectivity & compute resources.

Awards and Rankings

Overview of awards, rankings and other recognitions issues by third parties.

Carrier Ethernet 2.0 Certification MEF

Concerning Carrier Ethernet 2.0 Certification E-Access EPL, E-Access EVPL, E-NNI MEF 2.0, Eurofiber Nederland BV.

RI&E Eurofiber business units

Evaluations were carried out at Eurofiber Netherlands (including NMC monitoring center in Groenekan), Belgium and Dataplace in the field of policy (working conditions, absenteeism, reintegration, facilities (including FAFS), priority risks), psychosocial work risks and buildings & workplaces.

RI&E Safety in the chain

As a main contractor we take our responsibility. We must have insight in the potential risks our contractors and their subcontractors are exposed to. This so we can set the contractual framework for a safe working environment. This risk inventory must be verified by a certified safety expert. As such, this is considered a third party assessment.

The RI&E is set-up by the Eurofiber QSHE Department and verified certified safety experts of AECOM.

CSR Scorecard Eurofiber

CSR performance of this organization is assessed annually by FIRA Sustainability. Scores are based on the maturity of the CSR program, whether it matches the activities and size of the organization, as well as the level of ambition and actual impact. The CSR issues presented have been selected by the CSR Register based on market analysis and expert judgment and they are based on ISO 26000 core subjects and issues.

Human rights

	Current performance	Previous performance
Work for Vulnerable Groups ISO 26000 Class: Discrimination and vulnerable groups	◑	◑

Labor

	Current performance	Previous performance
Contracts and Social Obligations ISO 26000 Class: Employment and employment relationships	◑	◑
Health & Safety at Work ISO 26000 Class: Health and safety at work	↑ ◔	◑
Employability & Human Development ISO 26000 Class: Human development and training in the workplace	↑ ◔	◑

Tangible impact | Policy & Certificates
Targets & KPI's | CSR Measures
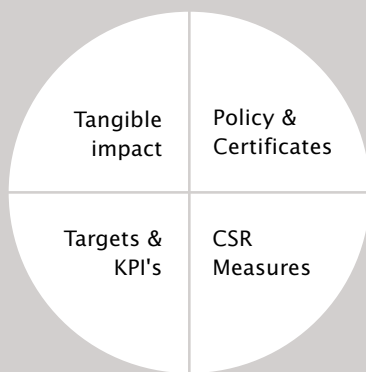
○ No initiatives have been disclosed.

◔ There is ambition, including policy, certificates or improvement plans on this issue.

◑ There are specific measures that contribute in a positive way to mitigate risks or realise opportunities.

◕ The ambition has been translated into clear goals, that are monitored periodically..

● Tangible CSR-impact has been realised on all relevant aspects of this issue.

🌱 Environment

	Current performance	Previous performance
Circular Economy ISO 26000 Class: Sustainable resource use	◑	◑
Energy Efficiency and Renewable Energy ISO 26000 Class: Climate change	◑	◑

♻ Fair operations

	Current performance	Previous performance
Sustainable Procurement ISO 26000 Class: Promoting social responsibility	◑	◑

🔋 Consumer issues

	Current performance	Previous performance
Privacy and Client Data Protection ISO 26000 Class: Consumer data protection	⬆ ◕	◑

Assurance statement

Eurofiber Nederland B.V. (further referred to as Eurofiber) has commissioned FIRA Sustainability B.V. (further referred to as FIRA) to provide external assurance on the reliability of its Corporate Social Responsibility information as presented in the CSR-Register (also known as MVO-Register). This statement is issued to Eurofiber based on our assessment of the content, including underlying systems and available evidence, as disclosed in its CSR Report and CSR Scorecard. This statement is intended for clients and other stakeholders who have a professional interest in Eurofiber sustainability performance and opportunities.

Scope

The scope for this assignment is: Operation and maintenance of fiberoptic networks by Eurofiber Nederland B.V. (chamber of commerce 34134377) in The Netherlands and Eurofiber N.V in Belgium. Rental of datacenter space, ICT services related to connectivity and datacenters by Dataplace B.V in The Netherlands. Eurofiber Holding and activities of all other (foreign) subsidiaries are not in scope.

CSR Report: TIM M

Eurofiber expresses commitment to the principles of corporate social responsibility, and discloses its ambition on CSR issues as prioritized by the CSR-Register, including management approach, policies, measures and plans.

Methodology & Work Undertaken

Organizations process its sustainability information in the CSR-Register. FIRA verifies all claims and information in accordance with the standard particular to the TIM M – CSR Report (see CSR-Register Protocol for details), based on moderate assurance. Claims and related information in the CSR-Register were reviewed based on the evidence made available by Eurofiber to FIRA to determine the plausibility of information. FIRA ensures that the assessment team possesses the required competencies and adheres to the principles of auditing regarding ethical conduct, professional integrity, and independence.

Conclusion

Eurofiber reports about initiatives and performance related to sustainability. Based on the work undertaken, we conclude that the claims and information portrayed through its report in the CSR-Register are reliable.

Summary FIRA Comments

We compliment Eurofiber on initiatives undertaken. Please find a summary of our comments as published in the CSR-Register below:

- **Balance & Completeness:** Management approach has been disclosed including clear objectives for all relevant CSR issues to monitor progress. We compliment Eurofiber with new initiatives on vitality, sustainable procurement, data protection, and supporting social initiatives and volunteer work. Other practices are focused on social return, health and safety for subcontractors, human development, refurbished equipment, mobility, use of renewable energy, employee engagement, and promoting technical occupations to girls. We encourage Eurofiber to quantify the impact of practices aligned with targets set, and to disclose monitoring practices for compliance type of practices.
- **Code of Conduct:** An internal policy on ethical behaviour is in place, we encourage Eurofiber to disclose a code of conduct suitable for external communication purposes.
- **Commitment to CSR:** Eurofiber has committed to the template CSR declaration, including commitment to all CSR principles and to progress on material issues. We encourage Eurofiber to work on a company specific declaration.

Date of issue: March 08, 2021

On behalf of FIRA,

Mr. E.V. de Wit
Lead Assessor & Technical Verifier

This report has been assembled from the CSR information of Eurofiber as registered in the CSR Register. The information in this report has been verified by FIRA Sustainability.
The assurance statement is included in this report.

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