

Corporate Social Responsibility at 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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About Eurofiber

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 of 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 and the welfare of employees and society to climate change mitigation and inspiring girls to pursue academic studies and careers 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. and MatrixMind B.V. in the Netherlands.

Our Commitment

As Eurofiber we recognize the importance of social responsibility and we are dedicated to ensuring 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 ethical behavior at all times;
- **Respect for stakeholder interests:** respect, consider and respond to the interests 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, The Netherlands, 28 April 2022

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.

Core theme	CSR topic	Contribution to SDG
 Human rights	Work for Vulnerable Groups (Social Return) ISO26000 Class: Discrimination and vulnerable groups	
 Labor	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	



Core theme

CSR topic

Contribution to SDG



Environment

Circular Economy

ISO 26000 Class: Sustainable resource use



Energy Efficiency and Renewable Energy

ISO 26000 Class: Climate change



Fair operations

Sustainable Procurement

ISO 26000 Class: Promoting social responsibility in the value chain



Consumer issues

Privacy and Client Data Protection

ISO 26000 Class: Consumer data protection and privacy



Human Rights



Work for Vulnerable Groups (Social Return)

Creating work for vulnerable groups means creating employment for groups such as the unemployed, people with lower levels of education, migrant workers, people from various ethnic backgrounds, disabled persons, etc. – i.e. social return.

Ambition

Developing a comprehensive program across all business units within the Eurofiber group in 2022 for creating work for vulnerable groups that includes ambitions, KPI's and planning.

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 to work at Eurofiber.

In 2021, Eurofiber and RefugeeForce continued their collaboration which resulted in a refugee from Syria working for us throughout the year.



Labor practices



Contracts and Social Obligations

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.

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.

G account

When you post, hire out or second personnel within or to the Netherlands, the recipient may request you to open a g account. A g account is a frozen account used solely to make payroll taxes or VAT payments to the Dutch Tax and Customs Administration.

The recipient deposits the estimated amount of payroll taxes or VAT payments into your g account. You can use this amount solely to pay payroll taxes or VAT. If you fail to make these payments, then the Tax and Customs Administration will not be able to

hold the recipient liable for the amount the recipient has deposited into the g account.

Eurofiber has incorporated a clause to apply the g account in the agreements with its contractors.

Health & Safety at Work



Providing a safe and healthy work environment (physical work, chemicals, dangerous locations, ergonomics, stress) for employees and subcontracted personnel at company and client locations, including vitality, prevention of injuries and occupational disease.

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 related to risk prevention and mitigation. Moreover, Eurofiber has ambitions to develop a policy in the field of absenteeism (including absenteeism due to psychosocial workload), absence prevention and the ongoing development of a vital corporate and safety culture. Partly as a consequence of the COVID-19 developments, extra attention is 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.

Goals

- **Absenteeism rate <4 percent:** Eurofiber has a continuous target for an average absenteeism rate. Eurofiber aims for a percentage lower than 4 percent.
- **100% access to ergonomic workstations:** we want to offer every employee the possibility to have an ergonomic workstation at home.
- **RI&Es:** Eurofiber business units have a verified RI&E in place.
- **Chain RI&Es:** by the end of 2022, all our contractors who build and maintain our network have an RI&E in place for their employees, as well as for customers visiting our PoP locations.
- **PSA failure rate < 2 percent:** Eurofiber has a continuous objective to keep dropout due to psychosocial workload (PSA) below 2 percent.
- **VCA certified main contractors:** our main contractors are VCA-certified according to the Safety Checklist for Contractors (which covers Safety, Health and the Environment).

Absenteeism

In addition to the local absenteeism policies, Eurofiber has group-wide actions to monitor the wellbeing of its employees, where we focus on physical complaints as well as psychosocial workload. In our annual employee satisfaction survey, we include questions about the psychosocial workload; we do this for both internal and external staff.

Eurofiber also provides ergonomic workstations. Now that hybrid working is here to stay, our employees are given access to the Lyreco home-work shop. In this shop, employees are given a budget

with which they can choose from a list of pre-selected articles for working at home. The range of options consists of ergonomic furniture and IT resources and is based on the results of the survey conducted previously.

In Belgium, the absenteeism rate was 1.56% in 2021; in the Netherlands it was 2.8%.

Based on the results of the employee satisfaction survey of 2021 we organized a lunch seminar regarding bullying at work and managers and directors followed an awareness session on how to recognize negative behaviors and address them appropriately. In addition, an internal confidant was appointed in Belgium. The measures taken aim to improve the psychosocial wellbeing of all our employees, create a better workplace and contribute to a better overall job satisfaction.

Health & Safety certificates for main contractors

Eurofiber outsources building and maintenance of the fiberoptic network and PoP locations to a select number of main contractors. All main contractors must have VCA**/ SCC ** (Safety Checklist for Contractors) certification or an ISO45001 certificate. Validity of the contractor is verified by Procurement. Dataplace will align with this policy in 2022 (see improvement plan).

All main contractors of Eurofiber Netherlands and Belgium have certification in place.

By requiring VCA**/ SCC**/ ISO45001 from our main contractors, we have ensured, and independently verified, that our contractors execute their work safely.

Certificates

- **RI&E Eurofiber**
- **RI&E Safety in the Chain**

Improvement plans

- Increase the number of VCA main contractors working for the Eurofiber Group: Dataplace has the intention to align with the Eurofiber Group policy and to ensure the main contractors are VCA-certified.
Time frame: December 31, 2022
- The Eurofiber Group prevention service to facilitate Occupational Health & Safety in each part of the organization: The intent of this service is that all appointed prevention officers will be in a virtual team, applying OHS group policies.
Time frame: December 31, 2022
- Define Incident KPI's: We have a program in place to ensure a 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.
- In 2021, KPI's were defined for our contractors. These are incident ratings as defined by VCA/ SCC. Safety in the Chain became effective by



contract in the Netherlands in November 2021. This will enable Eurofiber to gather the contractor's KPI's, compare contractors health & safety performance and initiate action in case of downward trends.

This improvement plan is still in process, as the same will be realized in Belgium in 2022.

Time frame: December 31, 2022

Human Development



Human development of employees and subcontracted personnel is about increasing knowledge, skills, and capacity. Human development creates opportunities for sustainable employability (aging work force, horizontal and vertical mobility).

Ambition

Eurofiber wants to bring in and retain the best people. This is why Eurofiber develops its employees continuously, so that they remain fully in tune with the rapidly developing company, sector and society.

Goals

- **Talent Management:** increase cross functional promotions in 2022.
- **Talent Development:** promote and support talent development via Eurofiber digital learning environment. Objective for 2021: 80% of all employees with at least four GoodHabitZ training courses completed, in addition to the mandatory courses.

Talent Management

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

Digital learning environment

The Eurofiber Academy, Eurofiber's digital learning environment, is 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.

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 four GoodHabitZ training courses, in addition to the obligatory trainings on the Eurofiber Academy. These numbers were also reflected in the personal targets set in 2021.

In 2021, 84 percent of our employees completed the obligatory trainings on the Eurofiber Academy.

42.67% of our employees took at least 4 training courses on GoodHabitZ, in total 2,721 hours training hours were registered via GoodHabitZ.

Talent management

In 2021, a new HR team was established with a focus on talent management. This team focuses on the talent management cycle, competencies and learning journeys to further develop our employees.

In 2021, different learning initiatives were set in place, such as an extensive leadership training on Personal & Coaching Leadership and the Grow Your Talent program.

The continuous improvement of the knowledge and competences of our employees is of vital importance to Eurofiber. In 2021, more than 80 percent of our employees took part in an online course and or joined an in-person training session.

The environment

Circular Economy

Design to prevent or postpone end-of-life of products and resources: reuse products, reduce the volume of resources, recycle materials (avoiding downcycling), and initiate reclamation programs.

Ambition

As an operator of fiberoptic networks and datacenters, we use considerable quantities of materials and – to a lesser extent – consumables. We continuously

work to reduce our climate impact. Therefore, we work towards 100% circular (for new builds, maintenance and replacements) throughout the entire supply chain by 2030.

Goals

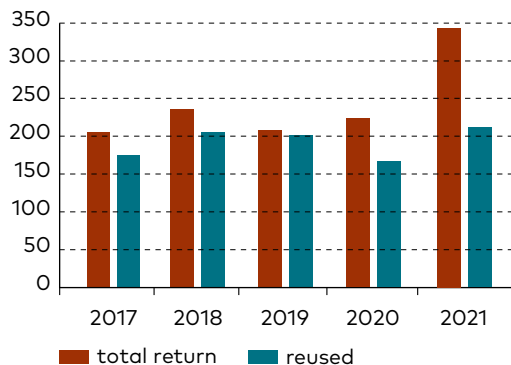
- **Return rate for used modems:** in case we terminate a service, the customer is asked to return the CPE for us to refurbish or recycle. Eurofiber is improving its process for returning used modems by its customers. Eurofiber aims at a return rate of at least 80%.
- **Eurofiber business units ISO14001 certified:** : all Eurofiber business units are ISO14001 certified to prove environmental legal compliance, insight in environmental aspects and actions to improve.
- **Banned & restricted chemical list:** We do not allow certain substances in our products, as these may end up in the environment when they reach end of life. Moreover, certain chemicals make it harder to recycle.

Return process for 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 Weeelabex-certified company. In addition, the CO₂ emissions from the transport of the modems are compensated.



Impact on society



A new metric since 2020 has been the percentage of returned modems. To what extent do our customers contribute to this initiative? The return rate was 40 percent in 2019 and 2020. In 2021, we accomplished a return rate of 42 percent. It is our aim to raise this to 80 percent in 2022.

Exclusion of the use of banned chemicals

In 2019, Eurofiber added the Cradle to Cradle Certified Banned Chemicals Reporting to its RFPs (where relevant) regarding materials and network equipment suppliers. By the end of 2020, the list became a mandatory part of new contracts for both passive and active materials.

In all new relevant contracts for both passive and active materials, Eurofiber requires a clause stating that no banned chemicals are used in its supply chain, and that there is insight if and to what extent restricted chemicals are applied. This is considered a knock-out criterium.

Improvement plans

- Increase number of used modems returned in our partner network:

Eurofiber wants to improve its process for returning used modems by its customers. Eurofiber aims at a return rate of 80 percent. 2022's focus will be on the partner network.

Time frame: December 31, 2022

- Environmental Product Declarations (EPDs) for materials: Eurofiber outsources building and maintenance to contractors, asking them to use Eurofiber-preselected materials. We are taking 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 and for RFPs. This will enable Eurofiber to choose the most sustainable option.

In 2021, Eurofiber requested Nibe to support us and our suppliers as a subject matter expert. This resulted in two pilots. In 2022 Eurofiber will expand this project to the remaining part of the product portfolio, with the intent to complete this by the end of 2023.

Time frame: December 31, 2023

- Exclusion of the use of banned chemicals for existing contracts: To gain insight in banned/ restricted chemicals for materials under a current contract. Once the insight has been achieved, ensure that relevant clauses are added when the contract is renewed. In 2021 this was started for materials used for lit fiberoptic services, such as CPEs and switches. In 2022 this will be finished for the active part and start for the passive (dark fiber) network, to be completed by the end of 2023.

Time frame: December 31, 2023

Energy Efficiency and Renewable Energy



Energy efficiency related to fiberoptic network operation and datacenters. Including transport, mobility, and use of renewable energy.

Ambition Eurofiber

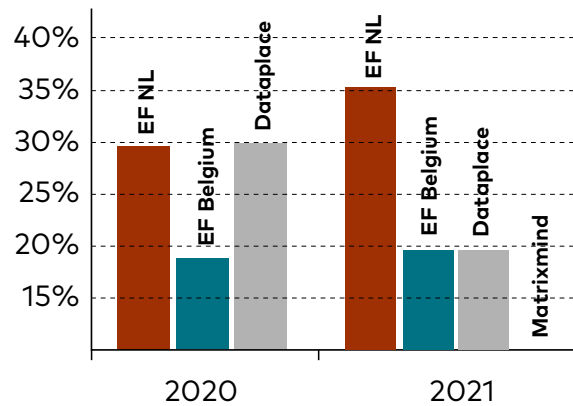
We continuously reduce our climate impact. We want to become a net-zero company, achieving scope 1 & scope 2 in 2030, with scope 3 following the lines of Science Based Targets.

Goals Eurofiber

- **Commitment to Science Based Targets:** Eurofiber is committed to the race-to-zero, an initiative of Science Based Targets, achieving scope 1 & scope 2 in 2030, with scope 3 following the lines of Science Based Targets.
- **Electric cars:** Eurofiber aims to have phased out all fossil-fueled cars in its fleet by the end of 2026.
- **Eurofiber business units ISO14001 certified:** all Eurofiber business units are ISO14001 certified. Our datacenters also hold an ISO50001 certificate in addition. The aim is to prove environmental legal compliance, provide insight in environmental and energy aspects and define actions to improve.
- **Compensate unavoidable flights:** Eurofiber limits flying and compensates CO₂ emissions of unavoidable flights.
- **100% green power:** Eurofiber uses 100 percent 'green' electricity for its offices, datacenters and point of presence (PoP) locations.

Electric car fleet

As of the start of 2022, Eurofiber implements a full-electric car only policy for all staff entitled to a lease car.



Manage Business Travel Footprint

Eurofiber has invested in technologies and processes to reduce the need for travel. While Eurofiber employees are expected to utilize such technologies whenever possible, it is recognized that travel for business purpose is justified and necessary from time to time. The Eurofiber travel policy sets out the rules and process to guide Eurofiber employees who incur travel-related business expenses (e.g., train, flight travel, taxi & cars, hotels, meals) during the performance of their work duties.

Air travel is limited and the CO₂ emission of unavoidable flights are compensated.

Prior to making travel arrangements, we carefully check if travel is needed and which means of travel best suits our CSR ambitions. For all our air travel, the CO₂ footprint is calculated via our travel booking tool provided by Uniglobe. Compensation of the carbon emissions related to air travel is provided by The Climate Neutral Group.

Eurofiber Group Energy and CO₂ inventory

Eurofiber aims to further reduce its emissions and CO₂ footprint. We measure our energy usage and CO₂ emissions, including KPI's, to monitor the effectiveness of our energy and CO₂ reduction initiatives. In 2020 we expanded our CO₂ footprint report to include Dataplace and Eurofiber Belgium. In 2021 we added DCspine (as part of Eurofiber Netherlands) and MatrixMind.

In 2020 we gained insight in effectiveness of current reduction initiatives. In 2021 Eurofiber committed to the SBTi race to

zero. In 2022 reduction targets will be submitted to SBTi. The baseline of 2021 will be used to report reduction results as of 2022.

Green power

Eurofiber Netherlands has chosen to procure 'Hollandse Wind' (locally generated wind energy) from Eneco for its point of presence (PoP) locations. Eurofiber Belgium purchases green energy from Electrabel. For the datacenters, Dataplace procures renewable energy generated by wind energy in Europe.



In 2020 Eurofiber Netherlands, Eurofiber Belgium and Dataplace offices used 100 percent green power to reduce CO₂ emissions.

In 2021 emission reporting was expanded to include the Eurofiber Netherlands and Eurofiber Belgium network facilities, as well as DCspine and MatrixMind. The reporting revealed that grey electricity is used in the Maarsse office, that part of the Eurofiber Belgium network facilities is connected to a third party energy supplier of unknown source, and that MatrixMind also uses energy from an unknown source. Intent is to investigate in 2022 how to transition to Green Energy. Current green energy = 98.2 percent.

SBTi commitment & target setting

The Eurofiber Group committed to the Science Based Target initiative in November 2021. In 2022 Eurofiber will also issue emission reduction targets for SBTi review & approval.

Eurofiber wishes to show to our customers and stakeholders that our emission reduction initiatives are being quantified and considered reliable and that we are working towards becoming a net-zero company.

Certificates

- ISO 50001

Fair practices

Sustainable Procurement



Materials and components are often produced and/or processed in risk countries. Issues such as safe working conditions, living wage, addressing forced and child labor, anti-corruption, prevention of pollution and land grabbing are relevant for these supply chains. Companies can influence their supply chain through responsible procurement decisions and/or collaboration.

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 endorse the same values as Eurofiber, such as acting responsibly and with integrity, communicating openly and transparently.

Goals Eurofiber

- **ISO14001-certified contractors:** all contractors responsible for building and maintaining the fiberoptic network and PoP locations to be ISO14001 certified or intent to be for 2021.
- **Increase insights:** For 80 percent of purchasing expenditure (spending) controlled by Procurement, a transparent overview will be

created identifying possible areas of improvement in quality, eco-friendly practices and smaller ecological footprint. Since Eurofiber is growing (both organically and through acquisitions), the scope of approach, policies and measures is constantly 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.

- **Compliance with ISO20400:**

Our ambition for 2022 is to comply with ISO20400 and reach overall maturity level 3.

Sustainable Procurement Policy

Eurofiber's socially responsible procurement policy, which is derived from and contributes to Eurofiber's central vision of CSR, is subdivided into five central themes. These are: Fair & Ethical Business Practices, Environment, Social involvement, Human rights & 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.

With our suppliers, we document this in a code of conduct. The Code of Conduct for Suppliers sets out basic requirements on human rights, labor, the environment and business integrity. The code is based on the UN Global Compact.

In 2021 Eurofiber updated its Sustainable Procurement Policy.

Sustainable Procurement Program

1. We have a Sustainable Procurement Policy in place which was updated in 2021.
2. We have identified our current baseline for ISO20400 (Sustainable Procurement) run by a third party (MVO-Manager). Following from that, we have defined actions for 2022 and beyond to reach the next maturity level (see improvement plans).
3. Sustainability is part of our sourcing process and supplier review process (e.g., selections DWDM equipment, catering, cleaning).
4. Purchase of cables takes place via our main contractors. In the framework agreement, they are required to purchase cables from TKF. According to TKF, only one percent of the production waste ends up in the incinerator; the rest is reused.
5. We support ongoing initiatives such as the Environmental Product Declaration and Science Based Target Initiative.

In 2021 Eurofiber mainly used cables from a party that proactively reduces its production waste to an absolute minimum.

Spend analysis

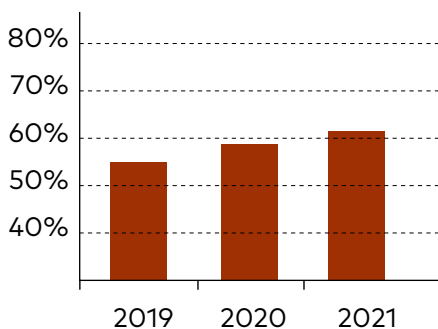
Eurofiber annually performs a spend analysis with the aim to monitor and/or identify expenditures, supplier landscape, contract landscape and supply risk.

Eurofiber has performed a spend analysis on 2021.

Supplier Code of Conduct

This Supplier Code of Conduct is based on the ten principles of the Global Compact of the United Nations. In 2019 Eurofiber optimized its Supplier Code of Conduct by using the standard created by FIRA. 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, it is also added to the prolonged agreements.

More than 60 percent of the annual purchasing expenditure in euros is purchased from suppliers where a Supplier Code of Conduct is included in the agreement.



ISO14001 Eurofiber contractors for building & maintenance

Eurofiber outsources building and maintenance of the fiberoptic network and PoP locations to a select number of main contractors. We require them to accept environmental responsibility and to have an ISO14001 certified environmental

management system in place. ISO14001 is independent proof that our contractors meet both local and European environmental legislation, gained insight in environmental aspects and made efforts to decrease their environmental impact. In 2020 we performed a gap analysis on existing ISO14001 certificates of our main contractors of Eurofiber in the Netherlands and Belgium. In 2021, ISO14001 was added to the RFP and current contracts as a knock-out criterium. Validity of certificates is being monitored by Procurement. For Dataplace we will develop a plan in 2022.

As of December 2020, all our main contractors responsible for building and maintenance of the fiberoptic network and PoP locations for Eurofiber in the Netherlands and Belgium are ISO14001 certified or they have the intention to do so in 2021 or 2022.

Health & Safety certificates for main contractors

Eurofiber outsources building 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) or an ISO45001 certificate. Validity of the contractor's certificate is verified by Procurement. Dataplace will align with this policy in 2022 (see improvement plan).

All main contractors of Eurofiber Netherlands and Belgium have certification in place.

By requiring VCA**/ SCC**/ ISO45001

from our main contractors, we have ensured, and independently verified, that our contractors execute their work safely.

Improvement plans

- Update sustainable procurement policy: in 2022 Eurofiber will update its sustainable procurement policies by completing the risk matrix per category (chapter 7.2).

Time frame: December 31, 2022

- Increase number of ISO14001 main contractors in Eurofiber Group: Dataplace will investigate whether ISO14001 for its type of main contractors will initiate the desired environmental impact, and thus align with Eurofiber Group policy. And if not, what would be a more suitable alternative for datacenter contractors. In 2021 ISO14001 was added to the supplier evaluation in order to have an overview of the suppliers currently holding this certificate. In 2022 Dataplace will define which suppliers will be required to hold ISO14001. Required suppliers that do not hold the certificate yet will be asked to issue a letter of intent to get certified within a year.

Time frame: December 31, 2022

- Compliance with ISO20400: As derived from the Eurofiber Group CSR ambition, Eurofiber aims to comply with the ISO20400 norm on Sustainable Procurement. At the end of 2021, Eurofiber performed a gap analysis on the current situation in collaboration with a third party. Eurofiber aims to reach the next

maturity level (level 3) in 2022.

Time frame: December 31, 2022



Consumer issues

Privacy and Client Data Protection

Data protection is about safeguarding all (privacy) sensitive information of clients and consumers.

Ambition

As a leading provider of vital fiberoptic networks and datacenter services, Eurofiber considers information security and the protection of personal data as an important 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.

Goals

- **Improve Security & Privacy awareness across the Eurofiber Group:**

To improve 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 for the average completion percentage on the Security & Privacy awareness modules to be 95 percent by the end of 2022.

Code of Conduct for Information Security

The Code of Conduct for 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 to deal with information security.

Privacy Policy of the Eurofiber Group

Our Privacy Policy focuses on dealing with personal data in a safe, honest and transparent manner and in a way that ensures 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.

Information Security Policy of Eurofiber

With our Information Security policy, the 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 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.

Security & Privacy Awareness Program

As a leading provider of vital fiberoptic 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 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 2021 and consist of a new learning course each quarter within the Eurofiber Academy. 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

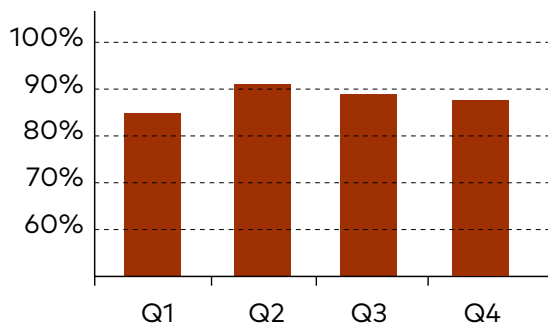
personal data can be guaranteed.

Another part of the Security & Privacy Awareness Program is publishing a quarterly Security newsflash or newsletter and performing activities like phishing tests.

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

In 2021 88 percent of all employees completed these mandatory modules in the Eurofiber Academy.

Following up on the percentage of employees who completed the learning path, the results for 2021 were as follows.



Although with an average result of 88 percent, we did not reach our goal of 95 percent completion, we believe the Security and Privacy awareness program as a whole strongly contributes to the goal to improve Security & Privacy awareness and knowledge across the Eurofiber Group.

Certificates

- ISO 27001
- ISAE 3402 (Type II)

Certificates, Product Labels and Assessments

Overview of certificates and other assessments by independent third parties.

ISAE 3402 - Type 2

For its fiberoptic network activities Eurofiber has an ISAE 3402 Type II statement for Eurofiber in the Netherlands. The Cloud Infra Division has an ISAE 3402 Type II statement for Dataplace and MatrixMind.

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 & computing resources.

ISO27001

Eurofiber holds certificates such as the ISO27001 standard for information security. ISO27001 certification provides our customers with a guarantee that the integrity, confidentiality and availability of data are safeguarded. The scope of the ISO27001 certification of the various BUs is described below.
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.
Providing Housing Services for ICT Infrastructure. These services encompass secured housing, uninterrupted power supply, access and climate control, connectivity & computing resources regarding the SoA version 1.3 dated 1 November 2021 by Dataplace B.V.
Information security with regard to designing, implementing and managing hybrid cloud environments regarding the SoA version 1.3 dated 21 December 2018 by MatrixMind B.V.

ISO 50001

Dataplace is ISO50001 certified (Energy Management System). Providing housing services for ICT infrastructure. These services encompass secured housing, uninterrupted power supply, access and climate control, connectivity & computing resources.

ISO 9001

Design, deployment, maintenance and management of cable infrastructure and telecom services by Eurofiber Netherland B.V.

ISO 9001

Design, management and operation of cable infrastructures and telecom services by Eurofiber Nederland B.V.

Dataplace is ISO9001 certified. Providing housing services for ICT infrastructure. These services encompass secured housing, uninterrupted power supply, access and climate control, connectivity & computing resources.

**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

The scope of this report is Eurofiber Netherlands, Eurofiber Belgium, DCspine and MatrixMind.

Evaluations were carried out for the Eurofiber Netherlands and Belgium locations related to policies (working conditions, absenteeism, reintegration, facilities (including FAFS), priority risks), psychosocial work risks and buildings & workplaces. DCspine is integrated within the Eurofiber Netherlands office. An evaluation of Dataplace was not carried out by an external party. No evaluation at MatrixMind took place in 2021; this is scheduled for 2022.

**RI&E Safety in
the chain**

We take our responsibility in the chain by evaluating potential risks our contractors and their subcontractors are exposed to.

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

Awards and Rankings

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

- **No. 40 Computable Career Top-50 (2020: -)**
- **No. 57 Computable Top-100 (2020: 46)**
- **No. 29 position Sustainability Computable (2020: 8)**

No. 29 in Computable Top-100

Sustainability Image

In this list of 100 best ICT companies in terms of image, Eurofiber ranked 29 in the field of sustainability (2020: 8)

No. 40 Computable Career Top-50

For the first time, Eurofiber is among the 50 best ICT companies to work for, according to Computable readers. Eurofiber ranked 40

No. 57 in Computable Top-100

In this list of 100 best ICT companies in terms of image, Eurofiber ranked 57 (2020: 46)

Recognition of vital infrastructure

Certain processes are so essential to Dutch society that outage or malfunctioning leads to severe social disruption and poses a threat to national security. These processes entail the Dutch vital infrastructure. The fiberoptic network of Eurofiber has been designated as part of the vital infrastructure for the Netherlands by the Ministry of Economic Affairs and Climate (EZK), which is responsible for telecom.

The status of vital infrastructure also means that the government offers Eurofiber a helping hand where and when necessary. 'Examples of this are the ICT support provided by the National Cyber Security Centre (NCSC) or the alerting from the National Coordinator for Security and Counterterrorism in the event of a terrorist threat', according to the Ministry of Economic Affairs and Climate. This recognition therefore formally underlines the importance of Eurofiber for Dutch society.



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.

 Human rights	Current performance	Previous performance	Contribution to SDG
Work for Vulnerable Groups (Social Return) ISO26000 Class: Discrimination and vulnerable groups			
 Labor			
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			



- 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	Contribution to SDG
Circular Economy ISO 26000 Class: Sustainable resource use			
Energy Efficiency and Renewable Energy ISO 26000 Class: Climate change			



Fair operations

Sustainable Procurement ISO 26000 Class: Promoting social responsibility in the value chain			
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Consumer issues

Privacy and Client Data Protection ISO 26000 Class: Consumer data protection and privacy			
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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. and MatrixMind 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 of 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 for all relevant CSR issues, including clear objectives for some issues. We encourage Eurofiber to include clear objectives for the remainder issues as well, to monitor progress. We compliment Eurofiber with new initiatives on CO₂ reduction, human development, and contracts and social obligations. Other practices are focused on social return, health and safety, circular economy, employee engagement, sustainable procurement, and data protection. 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:** A code of conduct is available. We encourage Eurofiber to include practices on awareness creation and compliancy monitoring.
- **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: April 28, 2022

On behalf of FIRA,



Julia J.A. van der Valk

Lead assessor / Technical verifier





This report has been compiled from the CSR information of Eurofiber as recorded 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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Country	The Netherlands