

Eurofiber 2022 Environmental, Social and Governance Report



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This report contains information about Eurofibers Environmental, Social and Governance (ESG) strategy and performance from the CSR Register.

The information in this report has been verified by FIRA Sustainability. The assurance statement is included in this report.

In addition to the information found in this report, we also report our ESG strategy and performances in the ESG audit and benchmark platforms Reporting 21, GRESB Infrastructure Asset and Ecovadis.

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Publication	Basic ESGCSR Report published on May 30, 2023
Verification	By FIRA Sustainability based on moderate assurance

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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 smart, open, future-proof cloud and connectivity solutions to companies, government bodies and non-profit organizations. Eurofiber enables total connectivity for the Connected Society, providing connectivity for all FTTx purposes with more than 66,700 km fiberoptic network in the Netherlands, Belgium, France and Germany, growing with an average of 50 km every week.

The Eurofiber Group was established in 2000. Since then, it has grown into an organization with multiple companies and operations in the Netherlands, Belgium, Germany and France and, 650 employees. Over the years, Eurofiber established a European position as significant player in the market for digital connectivity and cloud services. In June 2015, French long-term infrastructure investor Antin Infrastructure Partners acquired 100% of the shares in the Eurofiber Group. In October 2020, pension fund PGGM became a minority shareholder of Eurofiber, while Antin renewed its commitment in Eurofiber as majority shareholder. Although Eurofiber is no longer a start-up, we still act as a challenger with our unique

market approach based on open network infrastructures.

Corporate Vision

Today, technology is permeated in all industries, creating the digital society. The digital transformation moves ahead at full speed. More and more people, organizations and objects are permanently connected. Cloud-based business models and multichannel strategies are the new standard. Eurofiber has a unique position at the heart of the digital society, with thorough understanding of the need and drivers of it. With its fine meshed and open digital infrastructures, Eurofiber enables organizations to innovate and reach their full potential.

Eurofiber's vision is of an open network with infrastructure and IT services being offered separately, allowing everyone the freedom to choose their services and providers as their own needs evolve. Eurofiber was founded on these principles in the year 2000 and these remain relevant today. Back then Eurofiber's vision was at the cutting edge, today this model has proven itself to be a driving force behind innovation.

The freedom to choose

Eurofiber believes that its customers and partners must be able to choose which services they use on Eurofiber's network and which suppliers they use for these services. Eurofiber's datacenters offer the same

freedom: connecting to the outside world is carried out via Eurofiber's own network or with the services of other suppliers. This model enables Eurofiber's customers to create exactly the right IT solution for their organization, free from externally imposed limitations.

Flexibility: today and in the future

IT has revolutionized our world and will continue to do so. We work increasingly 'in the cloud', and we live in cities run by technology that gets smarter every day. Organizations need an infrastructure that allows them to anticipate and react to developments instantly, both now and in the future. Eurofiber's open network offers this flexibility, hand in hand with a reliable service customers can depend on.

Mission

Compared with other countries in the world, the Netherlands is one large metropolitan area. While this degree of urbanization has its benefits, it also presents many challenges. Think of the impact of an increasing population on traffic flows, for example, as well as demand for housing, water and energy supplies and CO₂ emissions. A Digital Society helps to meet – and overcome – these challenges. A Digital Society offers solutions. At Eurofiber we believe that citizens, public authorities and businesses should work together to address social and economic challenges. Technology can be leveraged to make smarter and more efficient use of assets in pursuit of this aim. This leads to sustainable economic development, innovation, enhanced well-being and sensible use

and management of natural resources.

In short: a Digital Society. Open network provides a solid basis A Digital Society relies on a permanent exchange and the unlimited availability of data. This calls for a reliable digital infrastructure that allows data and applications to be accessed anytime, anywhere. The open network delivers the capabilities that organizations need to unlock the infinite possibilities of the digital world and create the optimum solution for their business. In doing so, we provide the basis for connecting people, organizations and business assets in a Digital Society.

Core Values

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

View on Environment, Social and Governance

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 ESG policy extends from sustainable production, an inclusive work environment for our employees to climate change mitigation, including innovations serving the energy transition.

We are all elephants



Connectivity champions

To begin with, elephants are true champions in long-distance communication. What we can do with fiber-optics, elephants do with sound waves and ground tremors.

Working together

Just like us at Eurofiber, elephants love working together. An elephant herd is tightly organized and everyone has their own role. Together they are strong.

Strong and reliable

We're both strong and reliable. The elephant owes this to a thick skin, a strong constitution and its proverbial elephant memory, whereas we rely on our excellent network, datacenters, platforms, love for our customers, and the expertise of our professionals.

Fast and flexible

An adult elephant reaches a speed of 40 kilometers per hour, as we provide connectivity to 40 Gb/s and beyond.

Growing

The elephant literally grows all his life, like we do. Every week we connect new customers to our network and datacenters.



The story of the
elephant

ESG 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 Eurofiber Cloud Infra B.V., Eurofiber DC Spine B.V. and MatrixMind B.V. in The Netherlands. Eurofiber Holding and activities of all other (foreign) subsidiaries are not in scope.



Our Commitment

As Eurofiber 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 Environmental, Social and Governance (ESG).

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 ESG 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, ESG 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 ESG programs.

Maarsse, The Netherlands, May 30, 2023

Eric Kuisch
Chief Operating Officer

ESG Program

The ESG Program contains the operational strategy of Eurofiber for the most relevant ESG issues. Detailed descriptions of the policies, measures and certificates mentioned here can be found in the relevant chapters below.



Environmental impact

<div> Environment </div>	Climate & Energy ISO 26000 Class : Climate Change	<div> </div>
	Circular Economy ISO 26000 Class : Sustainable resource use	<div> </div>

Social Impact

<div> Labour Practices </div>	Inclusive Company ISO 26000 Class : Discrimination & vulnerable groups	<div> </div>
	Safe and Healthy Workplace ISO 26000 Class : Health and safety at work	<div> </div>
	Career Development ISO 26000 Class : Human development	<div> </div>

Governance

<div> Fair Practices </div>	Sustainable Procurement ISO 26000 Class : Promoting social responsibility	<div> </div>
	Contracts and Social Obligations ISO 26000 Class : Employment relationships	<div> </div>
<div> Consumer issues </div>	Privacy and Client Data Protection ISO 26000 Class: Consumer data protection and privacy	

Environmental Impact

Through climate actions and collaboration with our stakeholders, we are paving the path to become a net-zero company.



Climate & Energy

Energy efficiency related to fiber network operation and data centers. Including transport, mobility, and use of renewable energy.

Ambition

We continuously reduce our climate impact. We want to become a net-zero company, whereas scope 1 & scope 2 in 2030. For scope 3 we have set our target on 30% CO₂-reduction in 2030 towards 2021. These targets are also submitted in September 2022 to the Science Based Target initiative (SBTi) for approval.

Goals

- Commitment to Scienced Based Targets: Eurofiber is committed to the race-to-zero, an initiative of Scienced Based Targets, whereas scope 1 & scope 2 in 2030, scope 3 following the lines of Scienced Based Targets.
- Electrical cars: As from 2022 Eurofiber will only offer electrical cars to phase out all fossil versions by end

- of 2026.
- EF BUs ISO14001 certified: All Eurofiber Business Units are ISO14001 certified. Our datacenters hold an ISO50001 certificate in addition. This to proof environmen-tal legal compliance, insight in environmental and energy aspects and actions to improve.
 - Compensate unavoidable flights: Eurofiber limits flying and compen-sates the carbon emissions of unavoidable flights.
 - 100% Green power: Eurofiber uses 100 percent renewable electricity for its offices, datacenters and point of presence (POP) locations.

Energy and CO₂ reduction by climate proof design

Eurofiber has set targets to reduce the CO₂ emissions related to their business activities. To achieve these targets, we must innovate and apply new techniques in our networks and data centers. Our data centers certainly use a lot of energy and to reduce this our own innovation team has started various projects. These projects are aimed at new techniques for saving energy, reusing residual heat and preventing sustainably generated electricity from being lost at wind farms.

An energy-efficient ILA (Integrated line Amplifiers) has been built in collaboration with manufacturer Delta WW. Furthermore, Vattenfall has conducted a study into both energy-saving measures and energy generation options. In addition, our innovation team is working on various developments.

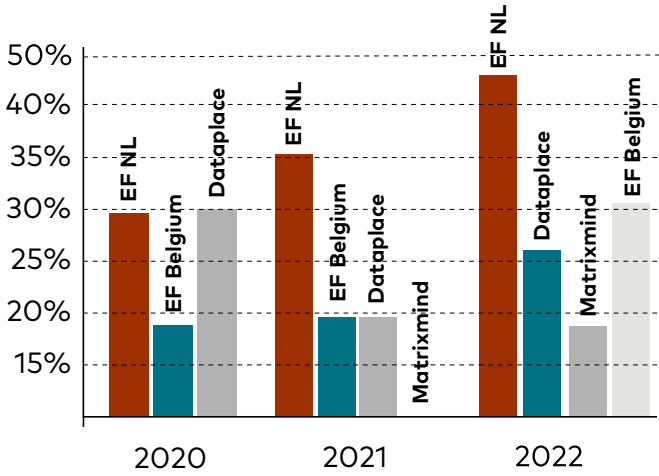
Green power

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

The percentage of renewable energy used in 2022 is 98,2%. This is not 100% because non-renewable electricity was temporarily purchased by the building owner in early 2022. This was corrected in March 2022 and since then, renewable electricity has also been used at the headquarters in Maarssen.

Electrical car fleet

As of the start of 2022, Eurofiber has implemented a full-electric car policy for all staff entitled to a lease car. This has resulted in an even further increase in the percentage of electric lease cars. And this contributes to a further reduction in our CO₂ footprint of mobility.



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 from time to time travel for business purpose will be necessary and justified. 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 his/her work duties.

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 KPIs (key performance indicator), to prove that our energy and CO₂ reduction initiatives are effective. After we have expanded our CO₂ footprint report with Eurofiber Cloud Infra and Eurofiber Belgium in 2020.

In 2022 we have included our France companies to the Eurofiber Carbon Footprint.

A refinancing has been concluded in 2022, which also includes ESG (Environment, Social and Governance) performances. The tree goals that have been agreed with the consortium of banks are about CO₂ reduction, gender equality and





the percentages of suppliers that has subscribed the Eurofiber Supplier Code of Conduct.

For this facility Eurofiber recently received the GlobalCapital's Sustainability Linked Loan of the Year Award, one of the leading information sources of the international capital markets. This prestigious award was given following a poll of parties in the financial markets.

SBTi commitment & target setting

Eurofiber Group committed to the Science Based Target initiative in November 2021.

In September 2022 Eurofiber has submitted their SBTi targets.

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

Certificate

- ISO 50001

Circular Economy



Material consumption puts increasing pressure on the earth, society and economy. In a circular economy, materials are not lost, but are renewable and/or reused. An organization can think about reducing (raw) materials and preventing waste, developing circular concepts for recovering, reusing and recycling products and materials.

Ambition

As an operator of fiberoptic networks

and datacenters, we use considerable quantities of materials and - to a lesser extent - consumables. We continuously reduce our climate impact. Therefore, we work towards 100% circular (for new build, maintenance and replacements) throughout the entire supply chain by 2030.

Goals

- Return rate used modems: In case we terminate a service, the customer is asked to return the CPE to 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%.
- EF BUs ISO14001 certified: All Eurofiber Business Units are ISO14001 certified to proof 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 at the point of end of life. And certain chemicals make it harder to recycle.

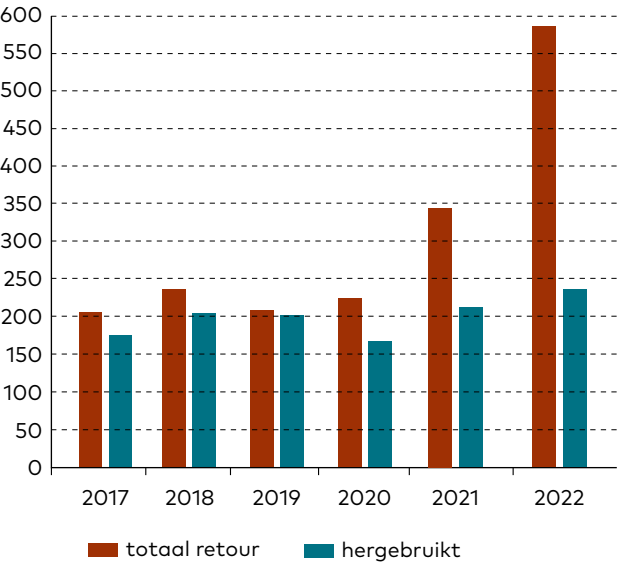
Exclusion of the use of banned chemicals

In 2019 Eurofiber added the Cradle to Cradle Certified Banned Chemicals Reporting to its RFPs (where relevant) regarding materials and network equipment suppliers. Since end 2020 the list is a mandatory part of new contracts for both passive and active materials. Eurofiber requires in all new relevant contracts for both passive and active materials that no banned chemicals are used in its supply chain. And that there is

insight if and to what extend restricted chemicals are applied. This is considered as a knock-out criterium.

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 Weeelabex-certified company. In addition, the CO₂ 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 was to increase the return rate up to 80 percent in 2022. For our direct customers we accomplished a return rate of 42%.

Improvement Plan
EPDs (Environmental Product Declaration)

for materials: Eurofiber outsources build 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 Environmental Product Declaration (EPD). Both for contracted as for RFPs. This will enable Eurofiber to actually choose the most sustainable option.

In 2021 Eurofiber requested Nibe to support us and our suppliers as subject matter expert and run two pilots. In 2022 Eurofiber started in cooperation with NLConnect to expand this project with a total of 16 companies out of the sector in The Netherlands, with the intent to complete by end of 2023.

Exclusion of the use of banned chemicals for existing contracts: Firstly, we gain insight in banned/ restricted chemicals for materials under a current contract. Once this has been achieved, to ensure that relevant clauses are added during the prolongation of the contract. For 2023 the Cradle to Cradle Restricted Chemical List will be part of the standard contract framework

In 2021 this was started for active materials. In 2022 this will be finished for the active part and start for passive, to be completed end of 2023.

Increase amount 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.



The percentage returned used modes for the direct sales customers has increased sharply in the second half of 2022 to more than 60%. The process has also been better organized for Belgium and has been included in the contract agreements with customers. Before 2023 we will start a project to also increase the percentage from the indirect sales channels.

include people with low education, people from a different ethnic background, people with disabilities or long-term unemployed. An inclusive employer offers work to people with a distance to the labour market and uses the added value of diversity in the company by coaching these people towards full responsibility and the prospect of sustainable employment.

Social Impact
Fair the way we do business is our motto to create social impact within our organization and among our stakeholders.

Labor practices

Inclusive Company



Not all people get equal opportunities in the labour market, which means that some groups fall by the wayside. These

Ambition
Eurofiber's DEIB (diversity, equity, inclusion, and belonging) ambition is: we do everything we can to be an inspiring place to work. Eurofiber set a target of reaching 30% female managers per end of December 2025 and 40% by the end of 2028.

Goals
Percentage female managers: Eurofiber has set a target of reaching 30% female managers per end of 2025 and 40% by the end of 2028.

Percentage female managers

Eurofiber has set a target of 40% female managers by 2028. Given the technical nature of Eurofiber's services, this means that we must ensure that more women are interested in working in a technical environment.

In 2022, the collaboration with Rightbrains started. RightBrains is an organization with the mission to attract and retain more women in digital technology through education, events, role model stories as well as a career and mentoring platform. In 2022, the percentage of female managers was 26% in NL and BE.

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 2021, Eurofiber maintained a workplace in co-operation with RefugeeForce.

Safe and Healthy Workplace



People are exposed to various occupational health and safety hazards while at work. Employers can mitigate these risks for employees and

subcontracted personnel, for example when it includes heavy physical work, working with machines and chemicals, and also consider RSI of psycho-social workload and stress. An employer takes measures to ensure safety of (external) employees, prevent work-related injury or illness, and promote vitality.

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 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 of 4 percent:
Eurofiber has a continuous target on average absenteeism rate. Eurofiber aims for a percentage lower than 4 percent.
- 100% access to ergonomic work station: we want to offer every employee the possibility to have an ergonomic work station 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 absenteeism rate less than 2 percent: Eurofiber has a continuous objective to keep the absenteeism due to psychosocial workload (PSA) below 2 percent.
- VCA certified main contractors: Our main contractors are VCA (Safety, Health and Environment) certified.

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. In our annual employee satisfaction survey, we question the psychosocial workload and we do this for both internal and external staff.

Eurofiber also provides ergonomic workstations. Now that hybrid working is a reality, our employees are given access to the Lyreco homework 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 offer consists of ergonomic furniture and IT resources and is based on the results of the previously conducted survey. In 2022 an Anti-Bullying and (sexual) harassment policy has been introduced and also a Long term leave policy.

In Belgium the absent rate was 1,56% in 2021 and in the Netherlands this was 2,8%.

In Belgium the absent rate was 4.06% in 2022 and in the Netherlands an average of 2,98%.

Based on the results of the employee satisfaction survey of 2021 we organized a in 2022 an all staff online lunch seminar regarding bullying at work and managers and directors followed an awareness session on how to recognize negative behaviors and how to cope with them. In addition an internal confidant was appointed in Belgium.

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

Health & Safety certificates 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) or an ISO 45001 certificate. Validity of the contractor is verified by Procurement. Eurofiber Cloud Infra will align with this policy in 2023 (see improvement plan).

All main contractors of Eurofiber NL and BE have certification in place.

By requiring VCA**/ SCC**/ ISO 45001 from our main contractors, it is ensured, and independently verified, that our constructor execute their work in a safe fashion.

Certificates and Assessments

- **RI&E Eurofiber:** The scope of this report is Eurofiber The Netherlands, Eurofiber Belgium and the companies of Eurofiber Cloud Infra. Evaluations were carried out for Eurofiber Netherlands and Belgium locations in the field of policy (working conditions, absenteeism, reintegration, facilities (including FAFS), priority risks), psychosocial work risks and buildings & workplaces. Where DCspine is integrated within Eurofiber Netherlands office. Evaluation for Eurofiber Cloud Infra was not carried out in 2022 by an external party and scheduled for 2023.
- **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. The RI&E is set-up by the Eurofiber QSHE Department and verified by the certified safety expert of Human Invest.

Improvement Plan

The Eurofiber Group prevention service: The EF 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.

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. In 2021 KPIs were defined for our contractors. These are incident ratings as defined by VCA/ SCC. Safety in the chain became effective by contract in November 2021 in the Netherlands. This will enable Eurofiber to gather the contractor's KPIs, compare contractor's H&S performance and initiate action in case of downwards trends.

Career Development



Employees are seen as the organization's capital. Especially in times of labor shortages, the retention of adequate staff is extra important. Employee development, sustainable employability and advancement opportunities are important elements in recruiting and retaining staff. An employer contributes to the development of the knowledge, skills and competencies of employees in the context of sustainable employability and career development.

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.

Talent Management

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

Talent management

In 2021 a new HR team had been set up with focus on talent management. This team focusses on the talent management cycle, competencies and learning journeys to further develop our employees. In 2022 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

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.

Governance

Our goal for Governance is 'first time right, so no non-conformance'. To reach this we consistently measure our progress toward our goals and use that data to assess risk and drive decision making.

Fair practices

Sustainable Procurement



Supply chains of products and materials have ESG risks, such as unfair wages, dangerous labor conditions, use of forced and child labor, corruption, pollution, deforestation, land grabbing and other violations of human rights. If companies identify such risks then they can use their influence and actively engage supplies to these improve issues (also beyond tier 1 suppliers).

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.

Goals

- Comply with ISO20400: Our ambition for 2022 is to comply with ISO20400 and reach overall maturity level 3.
- 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.
- ISO14001 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.

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 2021 and on 2022. The spend analysis of 2022 has also been used for the calculations for our Carbon Footprint Scope 3 and is part of our SBTi submission form.

Sustainable Procurement

Eurofiber's socially responsible Procurement policy, which is extracted 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, environment and business integrity. The code is based on the UN Global Compact. In 2021 Eurofiber updated it's Sustainable Procurement Policy.

Sustainable Procurement Program

1. We have an updated Sustainable Procurement Policy in place.
2. We have identified our current baseline on ISO 20400 (Sustainable Procurement) run by a third party (MVO-Manager). As a

result we have set 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 obliged 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 running initiatives such as Environmental Product Declaration (EPD) and Science Based Target initiative (SBTi).

In 2022 Eurofiber started in May with a Manifesto event for its 20 main suppliers. In September 2022 we started with one on one conversations with these suppliers to make Manifesto agreements with projects to aim our ESG ambitions. Projects are related to reduce CO₂ or make the products more circular.

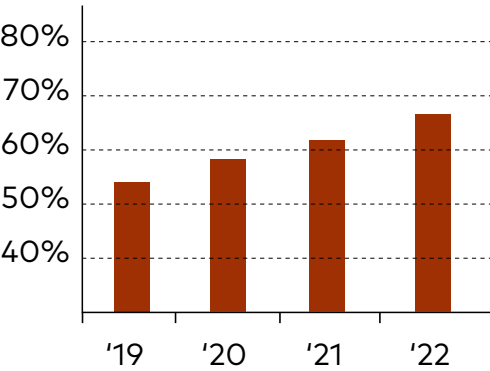
In 2022 we started the EPD Project with in total 17 companies out of the fiber sector. Goal of the project is to develop Product Category Rules (PCR) to be able to prepare Life Cycle Assessments (LCA) and Environmental Product Declarations (EPD) to calculate the environmental impact of active and passive equipment in a fiber network.

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



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. Since 2021, ISO 14001 has been added to the RfP and current contracts as knock-out criterium. Validity of certificates is being monitored

by Procurement.

As of December 2020, all our main contractors responsible for build and maintenance of the fiberoptic network and PoP locations for Eurofiber in The Netherlands and Belgium are ISO 14001 certified.

All main constructors for Eurofiber in the Netherlands and Belgium are ISO 14001 certified.

Improvement Plan

Comply with ISO 20400: As derived from the Eurofiber group ESG ambition Eurofiber aims to comply with ISO 20400 norm on Sustainable Procurement. At the end of 2021 Eurofiber made a GAP analysis in collaboration with a third party on the current situation. In 2022 Eurofiber has reached level 4.

Update sustainable procurement policy: In 2022 Eurofiber has updated its sustainable procurement policies by completing the risk matrix per category. The policy hasn't been updated in 2022, probably in 2023 based on the outcomes and advices of the ISO 20400 audit.

Increase amount ISO 14001 main contractors in Eurofiber Group: Eurofiber Cloud Infra will investigate whether ISO14001 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.

In 2021 ISO 14001 was added to the supplier evaluation. This to get an idea what suppliers hold this certificate. In 2022 Eurofiber Cloud Infra will define which suppliers must hold ISO 14001. The suppliers who do not, will be asked to issue a letter of intent to get certified within a year's timeframe.

Contracts and Social Obligations



Legal contracts with people who are allowed to work for both employed and subcontracted personnel, including work permits, pension payments, insurances, etc.

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.

Goals

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.

G-Account

When you post, hire out or second personnel in or to the Netherlands then the recipient may request you to open a g account. A g account is a frozen account that you can use solely to make payroll taxes or VAT payments to the 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. Should 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.

Consumer issues

Data Protection

With globalization, data-driven economy, and digitization, protecting customer- and privacy-sensitive information is becoming increasingly important. An organization can take measures to ensure there is adequate protection for products and/or information systems to prevent misuse of (privacy) sensitive data.

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 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 2022.

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.

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 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.

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.

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.

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 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.

Also part of the Security & Privacy awareness Program is that a quarterly Security newsflash or newsletter is published and that activities like phishing tests are performed.

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 2022 96% of the Eurofiber employees followed successfully the Security & Privacy courses.

Certificates and Assessments

- ISO 27001
- ISAE 3402 (Type II)

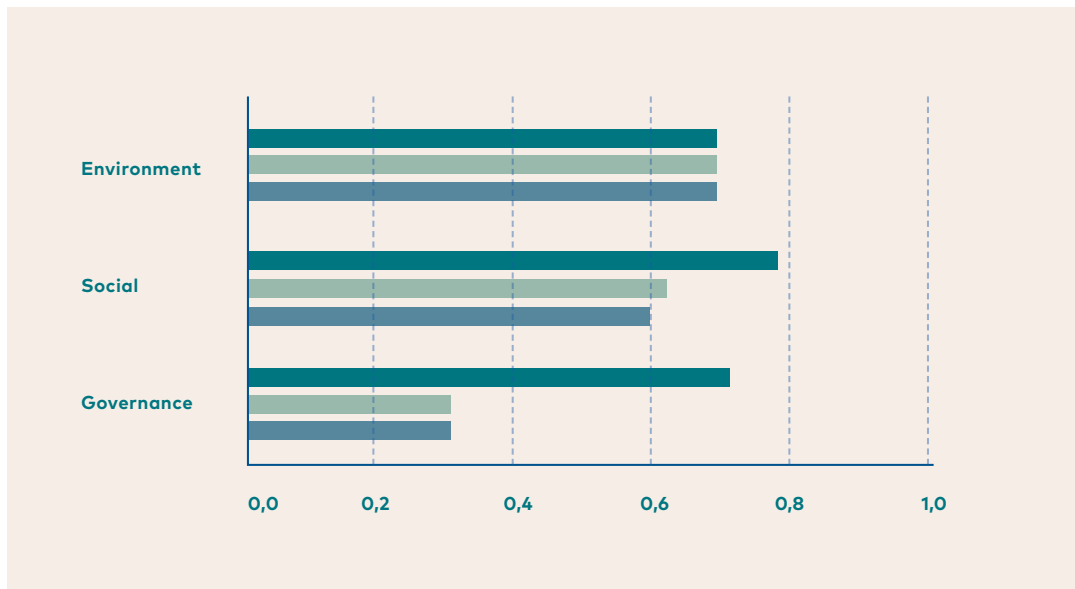


TIM-rating

ESG-Register Foundation

The ESG Register measured Eurofiber's ESG program through its TIM rating. TIM stands for: Transparency, Impact and Management. Based on 14 criteria divided into these three categories, a weighted average score is calculated. The scorecard has a maximum of 5 stars.

Eurofiber has made significant progress on ESG in recent years, particularly on the governance component, bringing the 2023 score to a weighted average of 72% (up from 56% in 2020). This resulted in a TIM score of 4 stars.



Certificates and Assessments

Overview of certificates and other assessments by independent third parties.

Ecovadis (Silver)	Eurofiber Nederland B.V. According to EcoVadis sustainability rating in 2022, Eurofiber Netherlands has achieved a silver status.
ISAE 3402 (Type II)	The Eurofiber Fiber Division has an ISAE 3402 Type II statement for Eurofiber in The Netherlands. The Cloud 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 Eurofiber Cloud Infra B.V. These services encompass secured housing, uninterrupted power supply, access- and climate control, connectivity & compute resource.
ISO 22301	Eurofiber Cloud Infra B.V. is certified for ISO 22301 with the scope; providing housing services for ICT infrastructures. These services encompass secured housing, uninterrupted power supply, access and climate control, connectivity & compute resource.
ISO 27001	Eurofiber is holding certificates such as the ISO 27001 standard for information security. ISO 27001 certification provides our customers with a guarantee that the integrity, confidentiality and availability of data are safeguarded. The scope of the ISO 27001 certification of the various BU's 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 & compute resources regarding the SoA version 1.3 dated 1 November 2021 by Eurofiber Cloud Infra B.V. Information security with regard to designing, implementing and managing hybrid cloud environments regarding the ISO 27001 certificate by MatrixMind 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. Eurofiber Cloud Infra B.V. 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. MatrixMind B.V. is ISO 9001 certified for the design, implementation and managing hybrid cloud solutions.
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.
GRESB Infrastructure Asset Assessment	The GRESB Infrastructure Asset Assessment provides the basis for systematic reporting, objective scoring and peer benchmarking of ESG management and performance of infrastructure assets. The Management Component measures the entity's strategy and leadership management, policies and processes, risk management and stakeholder engagement approach, comprising of information collected at the organizational level. It is structured into 5 aspects: Leadership/Policies/Reporting/Risk Management/Stakeholder Engagement The Performance Component measures the entity's performance, comprising of information collected at the asset level. It is structured into 12 aspects: Implementation/Output & Impact/Health & Safety/Greenhouse Gas Emissions/Air Pollution/Water/Waste/Biodiversity & Habitat/Employees/Customers/Certifications & Awards
ISO 20400 Sustainable Procurement	ISO 20400 contains practical guidelines for public and private organizations to organize their procurement process in a socially responsible manner and to ensure that it is in line with their sustainability strategy. The guideline defines the main principles of socially responsible procurement (SRI), such as accountability, transparency, respect for human rights and ethical behavior. ISO 20400 also indicates the importance of risk management.



RI&E Eurofiber

The scope of this report is Eurofiber The Netherlands, Eurofiber Belgium, DCSpine and Matrixmind.

Evaluations were carried out for Eurofiber Netherlands and Belgium locations in the field of policy (working conditions, absenteeism, reintegration, facilities (including FAFS), priority risks), psychosocial work risks and buildings & workplaces. Where DCSpine is integrated within Eurofiber Netherlands office. Evaluation Dataplace was not carried out by an external party. MatrixMind is not executed and scheduled for 2022.

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.

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 issues by third parties.

Golden status EcoVadis

According to EcoVadis latest sustainability rating in 2023, Eurofiber Netherlands has achieved a gold status. With this gold status, the ESG initiatives of Eurofiber globally reach the top 5% best-performing companies out of a total of 100,000 assessed companies.

GlobalCapital's Sustainability Linked Loan of the Year Award

In 2022 Eurofiber completed a Euro 1.5 billion sustainability-linked refinancing supporting further network expansion across Europe. For this facility Eurofiber recently received the GlobalCapital's Sustainability Linked Loan of the Year Award, one of the leading information sources of the international capital markets. This prestigious award was given following a poll of parties in the financial markets.

IT Infrastructure Innovator of the Year Award

Eurofiber Belgium has won in 2022 the IT Infrastructure Innovator of the Year Award by Data News.

No 36 in Computable's ICT employer Top-50

Annual research by Computable, employees who work in the industry are asked to rank their own company.

No 38 Computable 100 imago onderzoek 2022 ICT bedrijven

The Computable 100 is an annual ranking of the most popular ICT companies and non-ICT organizations as business partners/clients, in terms of innovation, as employers and the level of knowledge of their own ICT professionals.

Nr 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.

Nr 46 in Computable Top-100

In this list of 100 best ICT companies in terms of image, Eurofiber ranked 46 (2019: 65)

Recognition vital infrastructure

Certain processes are so essential to Dutch society that outage or



malfunctioning lead 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 a 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.

Top Employer 2023

The Top Employer institute certifies organizations based on the participation and results of their HR Best Practices Survey.

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 Eurofiber Cloud Infra B.V., Eurofiber DC Spine B.V. and MatrixMind B.V. in The Netherlands. Eurofiber Holding and activities of all other (foreign) subsidiaries are not in scope.

CSR Report

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 consistent with the ISO 26000 standard. FIRA verifies all claims and information in the CSR-Report based on moderate assurance. Claims and related information in the CSR-Report are 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 including clear objectives to monitor progress. We encourage Eurofiber to further expand the objectives and disclose results for all relevant CSR issues. We compliment Eurofiber on the progress of its CSR program, and on disclosing new initiatives on diversity, climate and circular economy including attention for supply chain partners, and support for volunteering. Other measures are focused on work for vulnerable groups, health and safety, employee engagement, sustainable procurement and data protection. We encourage Eurofiber to continue to quantify the lasting impact of measures on CSR issues.
- **Code of Conduct:** A company specific code of conduct is place.
- **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: May 30, 2023

FIRA Sustainability B.V.





This report has been assembled from the ESG 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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