colt
Data Centre Services

Sustainability Report

CY2025

Contents

About this Report

This Sustainability Highlights report covers the period from 1 January to 31 December 2025, unless otherwise stated. The report includes sustainability performance data across our environmental, social and governance (ESG) material topics identified and prioritised as part of the Double Materiality Assessment conducted in 2024. It covers Colt Data Centre Services Limited (Colt DCS).

Report scope

This report covers the following data centre sites that are wholly owned and/or operationally managed or developed by Colt DCS in CY25, unless otherwise stated. Sites that are under development are only included in Scope 3 (category 2, Capital Goods) emissions and employee-related metrics. For a complete overview of our data centre locations as of CY26, please visit our website: **www.coltdatacentres.net/en-GB**

For questions and feedback on this report, please contact: **sustainability@coltdatacentres.net**

- ✓ Operational sites, included in all metrics
- ↻ Sites in development, included in Scope 3 (Category 2) emissions and employee-related metrics
- ✕ Excluded from report scope

	Site name	CY25	CY26
Europe	London North	✓	✓
	London West	✓	✓
	Frankfurt City	✓	✓
	Rotterdam	✓	✓
	Paris South West	✓	✓
	Paris 2 - 6	↻	↻
	London 4	↻	✓ ↻ NEW
	London 5-8	↻	↻
	Frankfurt West	✕	✕
	Frankfurt 3	↻	✓ ↻ NEW
	Frankfurt 4 & 5	↻	↻
	Berlin 1 & 2	↻	↻
Japan	Tokyo Inzai 1	✓	✓
	Tokyo Inzai 2	✓	✓
	Tokyo Inzai 3	✓	✓
	Tokyo Inzai 4	✓ NEW	✓
	Tokyo Inzai 5	↻	↻
	Tokyo Shiohama	✓	✓
	Osaka Minoh city	↻	↻
	Osaka Keihanna	✓	✓
	Tokyo Yoshikawa 1, 2	↻	↻
India	Chennai	↻	↻
	Mumbai 1-2	✓ ↻	✓ ↻
	Mumbai 3-5	↻	↻

Foreword

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

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

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

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

A turning point in how we design and deliver data centres

As demand for AI and cloud services continue to grow, we are advancing how we design, build, and operate our data centres. In 2025, we optimised the Global Reference Design (GRD) document, which is serving as a repeatable and standardised blueprint design to industrialise the way we develop our upcoming data centres with a strong focus on modularity, scalability and flexibility. This has enabled us to embed greater energy efficiency principles, lower embodied carbon materials and near-zero wastewater advanced cooling technologies into the core architecture. Using modularisation means we can build faster and at larger scale, while using fewer materials, less on-site labour, and generating less waste. In 2026 and beyond, we will continue to expand the application of these design standards across all new developments.

Navigating environmental challenges

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

Be an employer of choice

This year, we welcomed more than 100 new colleagues to the team. In recognition of our commitment to create a workplace where people feel safe, supported and empowered to develop, Colt DCS achieved the Great Place To Work certification and won The Best Talent Developer of the Year at the Data Centre World Awards. Building on this commitment, and with demand for mechanical, electrical and skilled trades continuing to rise, we will keep investing in internal training and upskilling the next generation. We also continue to prioritise health, safety and wellbeing across all our operations as a core component of our ESG approach. In 2025, our Total Recordable Incident Rate decreased significantly to 0.18, down from 0.52 in 2024, reflecting the effectiveness of enhanced risk controls.

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

Quy Nguyen
Chief Sales Officer

About Colt Data Centre Services

Colt Data Centre Services (Colt DCS) designs, builds and operates hyperscale and large-scale colocation data centres for cloud service providers and enterprise customers. We operate 15 data centres globally, with an additional 12 under development across 9 cities in the UK, Europe, and the Asia-Pacific (APAC) region (as of CY26).

Colt DCS is a subsidiary of Colt Group Holdings Ltd. and is wholly owned by Fidelity Investments. The company operates independently within the Fidelity portfolio and is responsible for the development, ownership and operation of its data centre assets across Europe and Asia-Pacific.

Strategic partnerships

Colt DCS has three active joint ventures in the Asia-Pacific region, established to support data centre development in collaboration with local partners. For our customers, these partnerships provide available IT capacity in desired locations, accompanied with a customer experience that is second-to-none.

Colt DCS and ESR

In October 2025, Colt DCS entered into a joint venture with ESR, an Asia-Pacific-focused real asset owner and manager, to develop a 130 MW hyperscale data centre campus in Osaka. The joint venture includes an initial 65 MW phase, which will be designed and operated by Colt DCS. The development is planned as a multi-phase campus, with delivery phased in line with customer demand.

Fidelity and Mitsui & Co, and Mitsui & Co Asset Management Holdings

In 2021, Devonshire Investors entered into a joint venture agreement with global trading and investment company Mitsui & Co, and Mitsui & Co Asset Management Holdings, to provide state-of-the-art hyperscale data centres in Japan.

The joint venture has allowed Colt DCS to fast-track our Japanese hyperscale data centre strategy and further strengthen our presence in the Tokyo and Osaka regions.

Colt DCS and RMZ

In 2024, Colt DCS began a joint venture with one of the world's largest privately-owned alternative asset owners, RMZ to invest $1.7 Billion in the Indian data centre market.

This joint venture has enabled Colt DCS to accelerate the delivery of new capacity for customers in India, by leveraging RMZ's long term relationships with supply chain partners and their Fortune India 500 customers to further develop our digital infrastructure in Mumbai and Chennai.

CY2025 Highlights

1.41
Global PUE

92%
of employees would recommend Colt DCS as a great place to work

TRUE Zero Waste Certification
achieved at London North, Tokyo Inzai 1-3 and Osaka Keihanna

27%
Reduction in absolute greenhouse gas emissions in Scope 1, 2 (market-based) and 3 compared to the 2019 base year

Best Talent Developer Award
of the year 2025 awarded at Data Centre World for AI-driven Digital Learning Platform

ISO27001
Information Security Management System certification achieved globally

100%
Renewable Electricity in Scope 2

71%
active learner rate in the first ten months of launching My Learning Hub

ISO14001
Environmental Management System certification achieved in Europe and UK

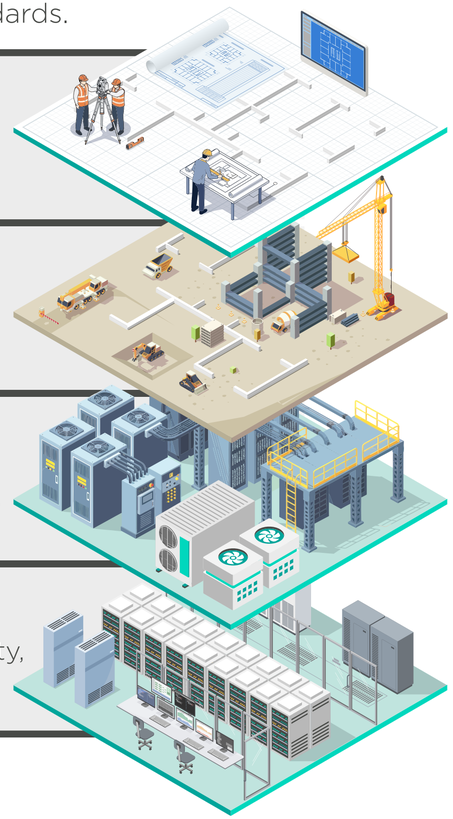
ESG Strategy

Our ESG strategy is embedded across the areas where we can deliver the greatest value. We prioritise measurable outcomes, such as carbon, energy, resource efficiency, safety and reliability, supported by clear governance that translates ambition into consistent, repeatable execution.

The strategy is structured around three core priorities. **Decarbonising our business** focuses on measuring emissions across the life cycle of both existing and new data centres, enabling better-informed operational, commercial, procurement and design decisions in support of our net zero pathway. **Connecting people** reflects our belief that sustainable growth depends on investing in skills, creating inclusive and supportive workplaces, and working constructively with partners and communities to ensure the benefits of growth are shared and long-lasting. **Safeguarding our company** provides the foundation for strong governance, ethical conduct, robust risk management, and rigorous security, health and safety practices that protect our customers, colleagues and partners.

Together, these priorities demonstrate how we protect performance today while building the foundations for resilient, responsible growth over the long-term.

Decarbonising our Business	Connecting People	Safeguarding our Company
Scaling our business, while delivering on our commitment to become net zero carbon by 2045.	Creating a lasting positive impact on our people and stakeholders across our entire value chain.	Running our business responsibly and to the highest ethical standards.
With **400+ dedicated employees and partners worldwide**, Colt DCS has been designing, building and operating data centres for global hyperscalers and large enterprises for 25 years.		
From inception to completion, our design, development and construction colleagues and partners are delivering **12 data centres** (as of CY26) across the UK, Europe and APAC, turning our vision into the physical, bricks, blocks, pipes, cables and space for our customers.		
We design our data centres in line with **core engineering principles** across civil, structural, and architectural (CA) disciplines, mechanical, electrical, and public health (MEP) systems, automation and controls, and security, delivering uniformity in quality, resilience and operational outcomes.		
Our site operation teams keep **15 data centres** (as of CY26) across the UK, Europe, Japan and India at peak performance, while ensuring uninterrupted availability, security, safety, and service excellence.		



From Concept to Delivery

The explosive growth of cloud computing, artificial intelligence (AI), and digital services has created unprecedented demand for hyperscale data centres worldwide. Yet, with this rapid expansion comes increasing complexity. In 2025, Colt DCS optimised its Global Reference Design (GRD), offering a repeatable, standardised blueprint that is flexible enough to adapt to local requirements yet is consistent in its core principles and aligned with our global ESG targets.

Unlocking value with a Global Reference Design

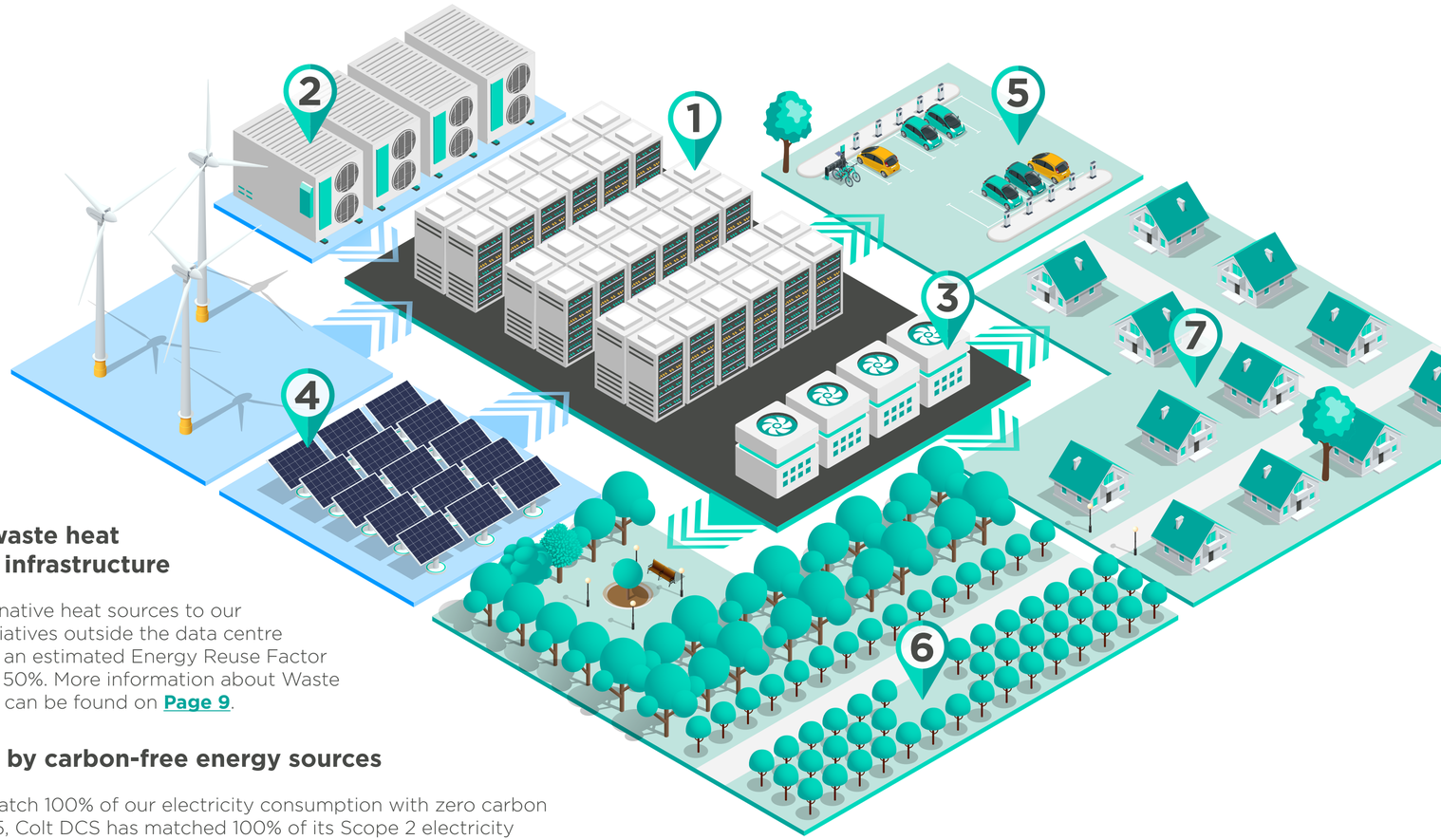
Colt DCS's Global Reference Design (GRD) ensures consistency in design and operational practices, while embedding sustainability principles that are aligned with our global ESG targets. More information about the GRD can be found on the **Colt DCS website**.

1. Resilient and efficient building design

- Targeting <1.2 annualised PUE
- BMS and DCIM capabilities for real-time monitoring, analytics and system control
- Prioritising local suppliers and vendors
- Targeting LEED, BREEAM or local equivalent building certification
- Targeting 75% waste diversion rate in construction and demolition and 90% waste diversion rate in operations
- Rainwater harvesting for non-potable indoor use
- LED lighting with occupancy sensors

2. Modular and reliable MEP systems

- Prefabricated modular electrical infrastructure, reducing on-site construction emissions, improving energy efficiency, simplifying maintenance and reducing the number of replaceable components required.
- SF_6-free electrical switchgear
- Critical chilled water systems using low GWP refrigerants (<7) with near-zero water consumption
- HVO-compatible backup generators



3. On-site waste heat recovery infrastructure

Providing alternative heat sources to our offices and initiatives outside the data centre boundary with an estimated Energy Reuse Factor (ERF) of up to 50%. More information about Waste Heat Recovery can be found on **Page 9**.

4. Powered by carbon-free energy sources

We strive to match 100% of our electricity consumption with zero carbon energy. In 2025, Colt DCS has matched 100% of its Scope 2 electricity consumption with renewable energy attribute certificates.

5. Sustainable mobility

The GRD combines a reduced parking footprint with electric vehicle (EV) infrastructure and bicycle storage facilities to promote sustainable mobility.

6. Enhancing local biodiversity

Ecological assessments are conducted to understand, predict, and mitigate the environmental impacts of development projects on the local ecosystems, habitats, and species. We aim to enhance local biodiversity by choosing native plants, improve storm water control and prevent erosion.

7. Staying connected with local communities

- Minimising the impact on water systems by using cooling with near-zero water consumption and collecting rainwater for non-potable indoor use
- Creating construction jobs and investing in training for ongoing operational roles
- Engaging and investing in local community initiatives and programs

How does waste heat recovery work?

Servers and supporting infrastructure in our data centres consume large amounts of energy, producing significant heat as a byproduct. By capturing this surplus heat and feeding it into district heating networks, we can turn a byproduct of the digital economy into a valuable local resource.

Where possible, Colt DCS is utilising recovered heat in two primary ways:

1. Supply to an external hot water district heating network through pipes (typically insulated and below ground) to serve residential and commercial buildings in local areas. Heat networks have been identified to play a key role in reducing carbon emissions and supporting the transition to net zero. Especially in Europe and the UK, governments have been actively promoting heat networks as a key component of the energy transition.

2. Locally within the data centre building itself. It can be reused to heat our office spaces via radiators or fan coil units, and serve heating coils within air handling units, reducing the need for separate heating systems utilising gas or other energy sources.

   A key metric used to evaluate the efficiency and effectiveness of heat recovery initiatives in data centres is the Energy Reuse Factor (ERF). ERF measures the proportion of a data centre's total annual energy consumption that is reused externally to substitute energy needs beyond the data centre's boundaries.

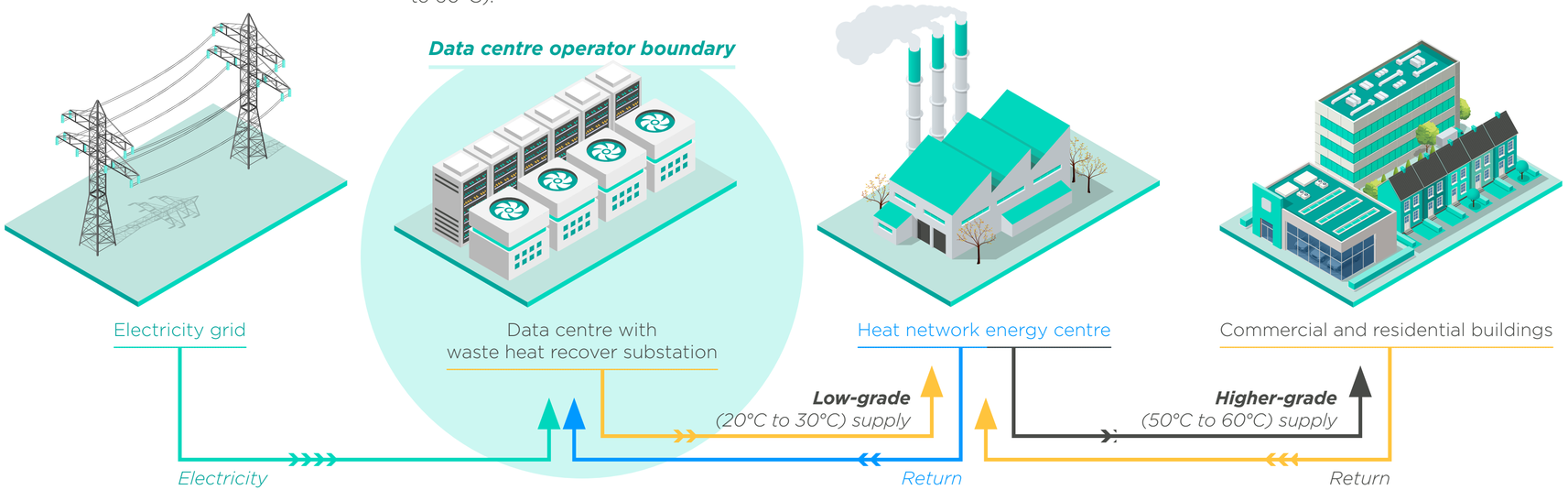
What influences the ability to recover heat?

1. **IT load and server utilisation:** The volume of recoverable heat depends on installed IT capacity, which increases as customer occupancy grows. It also depends on server utilisation, which is influenced by demand and workload type.

2. **Type of cooling system:** The type of cooling system used determines the coverable temperatures. Waste heat from data centres is low-grade (20°C to 30°C), limiting its potential direct use. Heat pumps are typically used to increase the water temperature, to a more usable higher-grade heat (50°C to 60°C).

3. **Infrastructure:** Large-scale heat recovery requires significant infrastructure, including pipes and pumps to transport low-grade heat. In or near urban areas, this is often limited by space constraints and distance to potential heat users.

4. **Status:** New data centres have the benefit of being able to plan for heat offtake, while existing facilities require individual assessments to ensure offtake is viable and can be undertaken whilst maintaining continuity.



Our embodied carbon roadmap

For many years, the data centre industry has focused largely on reducing operational energy use and improving efficiency. As data centres continue to grow in both number and scale, it is becoming essential to understand the relationship between upfront embodied carbon (emissions associated with extraction, manufacturing and installation of materials and equipment) and operational performance to make targeted decisions to reduce emissions across the entire building's life cycle.

Colt DCS is working towards a more structured and consistent approach to understand carbon emission hotspots over the lifecycle of its assets. A Whole Life Carbon Assessment (WLCA) is a useful tool to assess all building-related emissions and subsequently identify the most effective reduction measures while considering operational and embodied carbon in parallel. For example, improving the thermal performance of the building envelope can enhance operational efficiency, but often requires additional materials, increasing embodied carbon.

Assessments are generally conducted at different stages using OneClickLCA software, in accordance with EN 15804, ISO 14040/44 and the WLCA in line with the RICS Professional Statement: Whole Life Carbon Assessment for the Built Environment.

- **Design stages:** At the early- and technical-design stages assessments are conducted focusing on life cycle stage A1-A3 (cradle-to-gate), which encompass raw material extraction, transportation and manufacturing. These assessments allow us to influence early-stage material decisions, particularly the use of recycled content and low-carbon concrete and steel that have a significant influence on reducing the project's embodied carbon footprint.
- **As built stage:** Once practical completion has been reached, an as-built assessment is completed to quantify the actual carbon footprint and to understand the impact of design decisions.

Insights from early-stage embodied carbon calculations

When assessing the structure, substructure, and envelope (i.e. external walls, windows, façade and roof) along with civil works and finish materials, the load-bearing structure and envelope remain the dominant contributors to embodied carbon emissions. Embodied carbon is defined as the carbon footprint of construction materials from its extraction through to manufacturing of the production materials and fuels used by machines (A1 to A3).

Early-stage embodied carbon assessments are indicating a potential reduction of 13 to 22% in average project carbon intensity compared to the baseline by prioritising low embodied carbon concrete and structural steel with a recycled content of 80% or more.

Next steps

- **Material roadmap:** Understand and assess the regional availability and cost trajectories of structural recycled steel and low embodied carbon concrete to further develop future low-carbon design strategies in building systems.
- **Supply chain transparency:** Improve data quality and comparability by requesting Environmental Product Declarations (EPDs) or CIBSE TM65 assessments for main MEP equipment suppliers.
- **Intensity target:** Explore setting a maximum carbon intensity target for new developments.
- **Improve Scope 3 data quality:** Calculating embodied carbon enables us to transition away from the spend-based calculation methodology in Scope 3 (Capital Goods).

Designing out waste and water

As demand for digital infrastructure grows, data centre design is a key lever in managing resource use and environmental impact. Colt DCS integrates circular economy principles and water stewardship into its design approach, supporting efficient use of materials and minimising waste and water consumption across the asset life cycle.

Applying circularity in design, construction and demolition

The main purpose of the Circular Economy (CE) is to keep materials and resources in use indefinitely, through recycling and reusing, with no reliance on finite resources and no residual waste. In line with the Colt DCS Zero Waste Construction and Demolition Policy, we aim to apply CE principles by minimising fabrication, construction and demolition waste, and to ease repair and replacement with minimum waste, which helps reduce initial and in-use costs.

We are implementing the following actions:

- Plan for waste reduction from concept design to completion, including considering pre-fabrication, modularity, designing for longevity, adaptability, and disassembly.
- Prioritise materials that can be recycled or reused at the end of their life.
- Capture CE principles in the Procurement Strategy, Site Waste Management Plans and Operational Waste Management Plans.
- Ensure sufficient waste segregation and storage facilities in demolition, construction and operation.
- We have set an ambitious target of at least 75% diversion of waste to landfill during demolition and construction.

How our cooling design eliminates waste water

A key area of focus in the design of our data centres lies in the type of cooling systems we use, which are essential to prevent overheating and to maintain optimal performance in data centres. In the past, data centres relied on resource-intensive cooling systems because of their continuous water draw and evaporation to dissipate heat.

Newly designed facilities, on the other hand, are evolving rapidly to address this by building in cooling and energy efficiency principles into the core architecture. Innovations such as closed loop liquid cooling systems further expand on traditional designs by circulating coolant in a sealed loop, transferring heat without relying on evaporation. This reduces water discharge and eliminates routine wastewater during operation. Unlike traditional evaporative cooling systems, it does not require continuous water draw and discharge.

To ensure we protect water resources in the areas we operate, our new developments utilise chilled water systems with near-zero water consumption. This does not only enable us to eliminate routine wastewater generation during operation, but also to support ever higher compute densities with far greater efficiency.

> “With smart, considered design and responsible resource management, data centres can meet the surging demand of AI whilst safeguarding one of the planet’s most precious resources: water.”
>
> **Alistair Barnes**
> Head of Mechanical Engineering

Tokyo Inzai 4, Japan

CASE STUDY

Colt DCS Inzai 4 forms part of Colt DCS's long term investment in Inzai City, a location that has supported large-scale digital infrastructure development for more than a decade.

Opened in February 2025, Inzai 4 is the fourth Colt DCS facility in the area, building on hyperscale capability first established locally in 2011. The first phase of development delivered 4.8 MW of IT capacity, with the overall site designed to scale to a total of 20 MW as customer and market requirements continue to evolve.

Environmental considerations were embedded from the earliest stages of planning and design through the application of Colt DCS's Global Reference Design (GRD) standards. These standards provide a consistent framework for environmental performance across new developments. At Inzai 4, this included a focus on low embodied carbon construction, with reductions in the use of steel and concrete within the structural design. These measures were implemented to reduce upfront construction-related emissions while maintaining the durability, safety, and resilience required for hyperscale operations.

Operational efficiency was a central design driver. The facility is equipped with low GWP cooling chillers, selected to minimise total life cycle climate impact as the site scales. Recognising the growing influence of AI and high density workloads, the cooling infrastructure has been engineered to be compatible with future liquidcooling technologies, enabling adaptation to higher thermal loads over time without major structural changes.

Water stewardship formed a further component of the sustainability strategy. Cooling system design incorporates measures intended to reduce water waste and promote more efficient resource use, supporting responsible operation in a region experiencing sustained growth in digital demand. In parallel, landscaped green areas have been integrated across the site, contributing to biodiversity support and improved environmental integration with the surrounding area.

These combined measures support the delivery of scalable digital infrastructure while aligning the design and operation of Inzai 4 with Colt DCS's broader environmental and sustainability objectives in the Asia-Pacific region.

KEY FEATURES:

- Low embodied carbon construction aligned with GRD standards
- Low GWP cooling systems with future liquid cooling compatibility
- Landscaped site design supporting local biodiversity

Paris 2, France

CASE STUDY

Paris 2 is a hyperscale development designed to support the continued growth of digital and AI services in the Paris region.

Located in Villebon-sur-Yvette, the facility is the first development on a newly prepared 12.5 acre campus, with the wider site planned to accommodate multiple large-scale data centres over time.

The facility has been designed in accordance with Colt DCS's Global Reference Design (GRD) framework, integrating low embodied carbon construction principles, efficient resource use, and operational resilience. When fully developed, Paris 2 is planned to deliver 39.6 MW of IT capacity, supporting cloud, enterprise, and machine learning workloads, including higher density compute environments. The design targets an annualised PUE of 1.27, reflecting a strong focus on energy efficiency within the operating model.

A core sustainability commitment for Paris 2 is energy sourcing. Electricity supply contracts have been secured to enable the facility to operate on 100% renewable electricity from day one, supporting reduced Scope 2 (market-based) emissions over the operational life cycle. Cooling is delivered through a 100% air-based system, eliminating process water use and enabling near-zero water waste during operations, while maintaining performance under varying IT loads.

The facility has also been engineered to enable future waste heat recovery. Although not currently connected, infrastructure has been incorporated to allow potential integration with a local district heating network where conditions and demand allow, creating an opportunity for shared environmental value beyond the data centre boundary.

Sustainability considerations extend to construction and site integration. European sourced materials have been prioritised to support responsible procurement and regional supply chains. In addition, 1,096 m^2 of rooftop solar has been installed to contribute to auxiliary power demand. Together, these measures support the delivery of efficient, scalable digital infrastructure aligned with Colt DCS's sustainability and energy transition objectives in France.

KEY FEATURES:

- 100% renewable electricity secured for operations
- Air-based cooling systems with near-zero water consumption
- Waste heat recovery capability for future district heating

Frankfurt 3, Germany

CASE STUDY

Colt DCS Frankfurt 3, located in the Sossenheim district of Frankfurt, supports large-scale digital infrastructure development in one of Europe's most established data centre markets.

Construction commenced in September 2023 on this Tier 3 facility, which has been purpose-built to support cloud, AI, and high-performance computing workloads.

The three storey facility is designed to deliver up to 32.4 MW of IT capacity across approximately 17,500 m^2 of gross floor area. The building configuration provides scalability and flexibility, enabling the site to support increasing compute densities while maintaining operational resilience, availability, and security over time.

Environmental performance has been addressed through alignment with Colt DCS's Global Reference Design (GRD) principles. Frankfurt 3 will be powered by 100% renewable electricity from the start of operations, supporting reduced operational emissions. Cooling is delivered via low GWP refrigerant cooling systems with near-zero water consumption, combined with readiness for liquid-to-chip cooling, enabling efficient thermal management as customer workloads evolve.

Low-carbon materials were specified during design and construction to reduce embodied emissions associated with the building structure.

Frankfurt 3 has achieved LEED Silver pre-certification. Landscaped areas and wider site-level environmental enhancements contribute to improved biodiversity outcomes and better integration with the surrounding environment. Plans are also in place to pursue ISO 14001 certification following Phase 1 commissioning.

Together, these measures support the delivery of resilient hyperscale digital infrastructure while aligning Frankfurt 3 with Colt DCS's environmental management and sustainability objectives in Germany.

KEY FEATURES:

- 100% renewable electricity from day one
- Low GWP refrigerant cooling systems with near-zero water consumption
- LEED Silver pre-certification

London 4, UK

CASE STUDY

London 4 forms part of Colt DCS's expanding multi-building campus in Hayes, West London, supporting growing demand for digital and AI-driven services in the UK.

The facility delivers 30.5 MW of IT capacity across five floors and has been designed to provide scalable, resilient infrastructure for cloud and high-performance computing workloads.

Structural design optimised the use of steel and concrete to reduce embodied emissions while maintaining performance and durability. The facility will be powered by 100% renewable electricity, supporting reduced Scope 2 (market-based) emissions.

Operational efficiency is supported through the use of low-GWP refrigerant cooling systems engineered for energy-efficient performance and future liquid cooling compatibility, enabling adaptability as compute densities continue to increase. Water stewardship is addressed through rainwater harvesting systems, reducing reliance on potable water sources for site operations.

The facility has also been designed to enable future waste heat reuse, with infrastructure in place to support potential connection to local district heating networks where feasible. Biodiversity measures include green walls, green roofs, and soft-surface planting, enhancing environmental value and improving site integration within the local area.

Construction of London 4 followed circular economy principles, with a strong focus on material recovery and waste reduction. In parallel, the project contributes to local social value through employment opportunities, apprenticeships, and continued community engagement within the London Borough of Hillingdon.

KEY FEATURES:

- Striving towards BREEAM green building certification
- Renewable powered operations with efficient cooling systems
- Rainwater harvesting and urban biodiversity measures

Operational Excellence

Our regional operations teams maintain the highest standards in the day-to-day management of our data centres, ensuring uninterrupted availability, security, safety and service excellence for our customers. They are also central to the delivery of our ESG objectives, driving improvements in energy efficiency, sourcing renewable power, reducing greenhouse gas emissions and waste, continuously monitoring our performance, and upholding the highest health and safety standards across our operations.

How we manage energy

As the data centre industry expands amid rising global electricity demand and the transition to lower carbon power systems, energy efficiency and the sourcing of renewable electricity have become fundamental to managing both operational performance and environmental impacts.

Energy efficiency

Colt DCS prioritises reducing energy intensity attributable to its infrastructure, with a strong focus on cooling systems, which represent a significant proportion of non-IT electricity consumption. By optimising cooling performance and operational controls, we strengthen energy efficiency across our portfolio and reduce the emissions intensity associated with our operations.

Energy consumption is monitored across operational sites through metering and performance management systems, enabling ongoing tracking of infrastructure efficiency. Energy management practices are supported by formal systems and governance. The Paris South West site remains certified to ISO 50001 (Energy Management Systems) and EU Code of Conduct on Data Centre Energy Efficiency. This provides a structured framework for identifying efficiency opportunities, implementing improvement actions, and supporting continual improvement in energy performance.

Optimising infrastructure at our London North data centre

In 2025, Colt DCS continued targeted energy efficiency actions at its London North data centres, building on optimisation measures introduced in 2024. Operational improvements focused on HVAC optimisation, control system standardisation, UPS efficiency upgrades, and lighting enhancements, delivering a material reduction in electricity demand, resulting in around 7.4 GWh of annual electricity savings.

PUE

PUE (Power Usage Effectiveness), defined by ISO 30134-2:2016, compares the total electricity consumed by a data centre with the electricity used by customer IT equipment.

In 2025, Colt DCS's global PUE was 1.41. The PUE performance is influenced by factors including climate conditions, occupancy rates and the maturity of operational sites. Facilities in ramp-up, ramp-down or partial-occupancy phases typically exhibit higher PUE values, as fixed infrastructure loads are proportionally higher during early stages of utilisation. Higher and more stable utilisation levels support improved efficiency. As a result, centralised data centres are typically more energy efficient than smaller, on-site server environments, which often operate at lower utilisation levels.

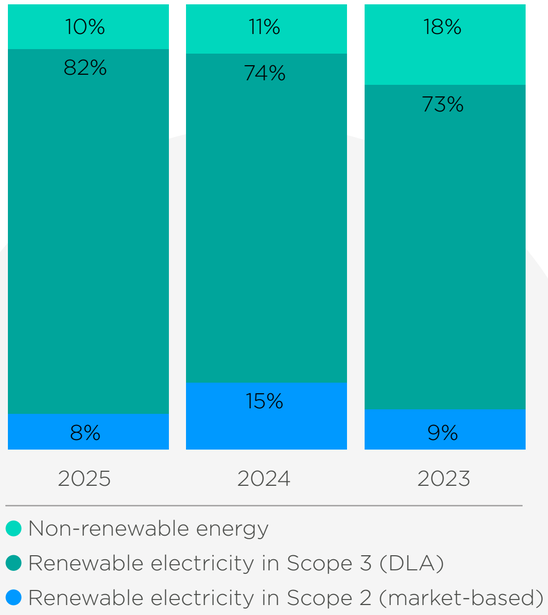
Sourcing renewable energy

In 2025, Colt DCS sourced 100% renewable electricity in Scope 2, through renewable energy certificates. Scope 2 reflects the emissions associated with the electricity consumed by Colt DCS to operate data centre infrastructure and offices.

When total site energy consumption is considered, 90% is sourced from renewable energy. Total energy consumption includes all energy used by Colt DCS operations and our customers, including electricity and fuels. All percentages in the chart are based on total energy consumption. Fuel-related emissions are accounted for in our Scope 1 reporting.

Emissions associated with submetered electricity consumed by customer IT equipment are reported under Scope 3, Downstream Leased Assets (DLA). Many of our customers are among the world's largest purchasers of renewable and zero carbon electricity and have established ambitious climate targets of their own.

The non-renewable energy consumption relates to fuel consumption by back-up generators and small proportion of Scope 3 (DLA) electricity consumption in Asia.



Progress towards net zero

Decarbonising the design, development and operation of data centres presents both a significant challenge and a strategic opportunity for the industry. As demand for digital infrastructure continues to grow, data centres must manage rising energy use, embodied carbon and operational emissions while maintaining resilience, performance and security.

Scope 1 – Direct emissions

Scope 1 emissions primarily arise from fuel used in back-up power generation and from refrigerant leakage associated with cooling systems. Decarbonisation actions focus on minimising fuel consumption and improving the detection of refrigerant leakages. In our new developments, we ensure back-up generators are compatible with Hydrotreated Vegetable Oil (HVO) and cooling systems are using low global warming potential (GWP) refrigerants, alongside robust system maintenance and leak-prevention practices.

Scope 2 – Purchased electricity emissions

Scope 2 emissions relate to electricity consumed in offices and to operate data centre infrastructure. Colt DCS purchases 100% renewable electricity covering operational consumption, accounted for in Scope 2 market-based emissions in line with the GHG Protocol. We calculate both market- and location-based Scope 2 emissions. More information can be found in the **Annex**.

Scope 3 – Upstream and downstream value chain emissions

Scope 3 emissions represent the largest share of Colt DCS's reported emissions and reflect activities across the wider value chain. The focus within Scope 3 is on improving data quality, strengthening emissions measurement, increasing transparency and working together with our customers and suppliers to decarbonise.

Scope 3 emissions include a range of indirect emissions arising across the value chain. Material categories include Capital Goods (CG), Downstream Leased Assets (DLA), and Purchased Goods and Services (PG&S), alongside Fuel- and Energy-Related Activities (FERA), Operational Waste, Business Travel, and Employee Commuting.

In 2025, improvements were made to the calculation of PG&S and CG emissions, including the use of more detailed and representative emission factors and an expanded spend-based methodology. This change reflects enhanced data availability and a shift toward more comprehensive accounting, improving overall data accuracy and completeness compared to previous years.

In CG, we account for the embodied carbon emissions associated with the construction of new data centres, including building materials, mechanical and electrical equipment, and on-site services. As Colt DCS continues to expand its portfolio, emissions in this category are expected to increase.

To better capture these impacts, Colt DCS is progressively integrating whole life carbon assessment (WLCA) principles into new developments. WLCA enables a more complete understanding of emissions over the full life-cycle of assets and supports more informed design, material selection, and procurement decisions. More information about our Embodied Carbon Roadmap can be found on **page 10**.

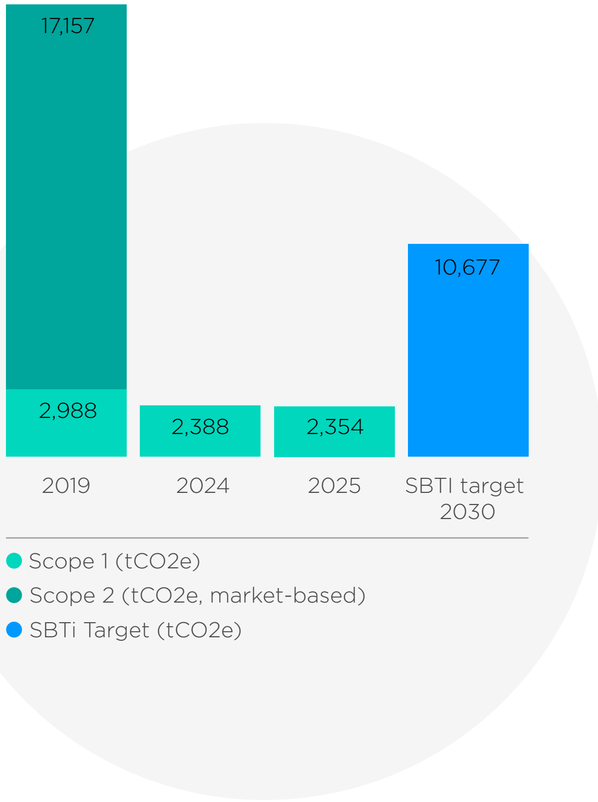
Progress towards our Scope 1 and 2 target

In 2025, Colt DCS reduced its Scope 1 and Scope 2 (market-based) emissions by 88% compared to 2019, due to the continued procurement of renewable electricity and increased operational efficiency. Our near-term science-based target is to reduce Scope 1 and 2 emissions by 47% by 2030 from a 2019 baseline.

Our Scope 1 emissions decreased by 1% compared to 2024. While our overall fuel consumption increased, emissions associated with refrigerant leakages decreased. Fuel consumption patterns vary by site and year and are influenced by factors such as generator testing regimes, power outages, and maintenance works. While some sites recorded increased fuel use in 2025, others experienced reductions following the completion of revised testing frequencies.

Refrigerant emissions decreased overall in 2025, driven by improved maintenance practices, system upgrades, and enhanced refrigerant management. While some older sites recorded higher refrigerant losses as cooling equipment ages, no significant leakage events were identified. Variations between sites reflect differences in system age, refrigerant type, and maintenance schedules.

As Scope 2 (market-based) emissions remain zero, changes in Scope 1 emissions drive most year-on-year movement in Scope 1 and Scope 2 emissions accounting. Maintaining 100% renewable electricity coverage remains a core priority of Colt DCS's decarbonisation strategy and our long-term progress toward net zero.

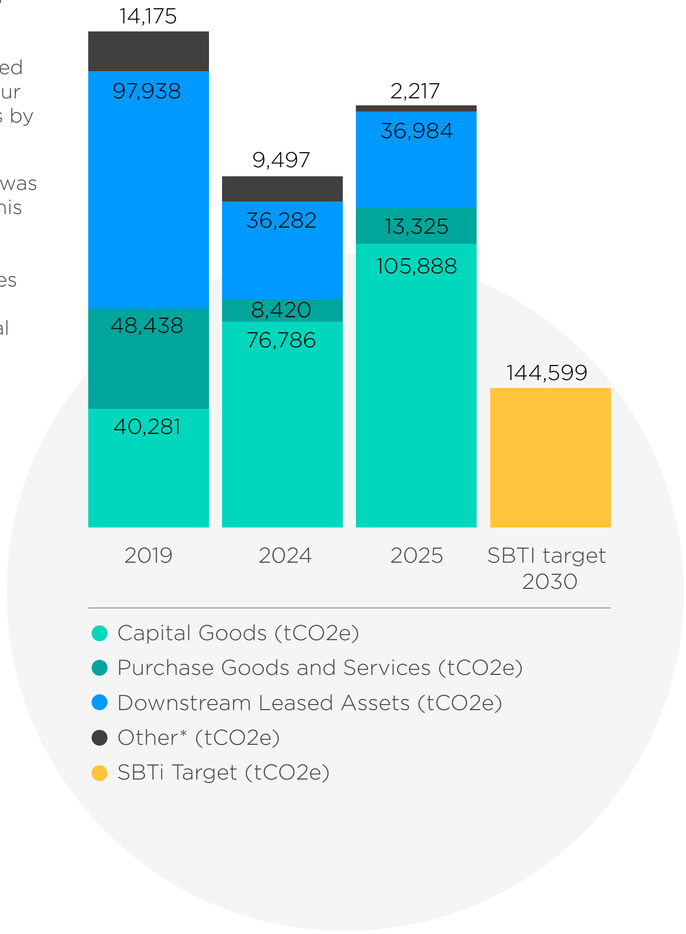


Progress towards our Scope 3 target

Colt DCS achieved a 21% reduction in Scope 3 emissions, compared to 2019, reflecting continued progress in addressing value-chain emissions. Our near-term target is to reduce Scope 3 emissions by 28% by 2030 compared to the 2019 baseline.

Despite this reduction compared to 2019, there was a year-on-year increase in Scope 3 emissions. This increase in scope 3 is driven by the increase in CAPEX related to the development of new data centres globally. Scope 3, Capital Goods, includes embodied carbon emissions associated with construction materials, mechanical and electrical equipment, and on-site construction activities.

Downstream Leased Assets (DLA) emissions reduced by 62% compared to 2019, reflecting the ongoing decarbonisation efforts by our customers to address emissions associated with electricity consumed by their IT equipment. In 2025, renewable electricity covered 90% of Scope 3 electricity consumption, equivalent to 82% of total energy consumption.

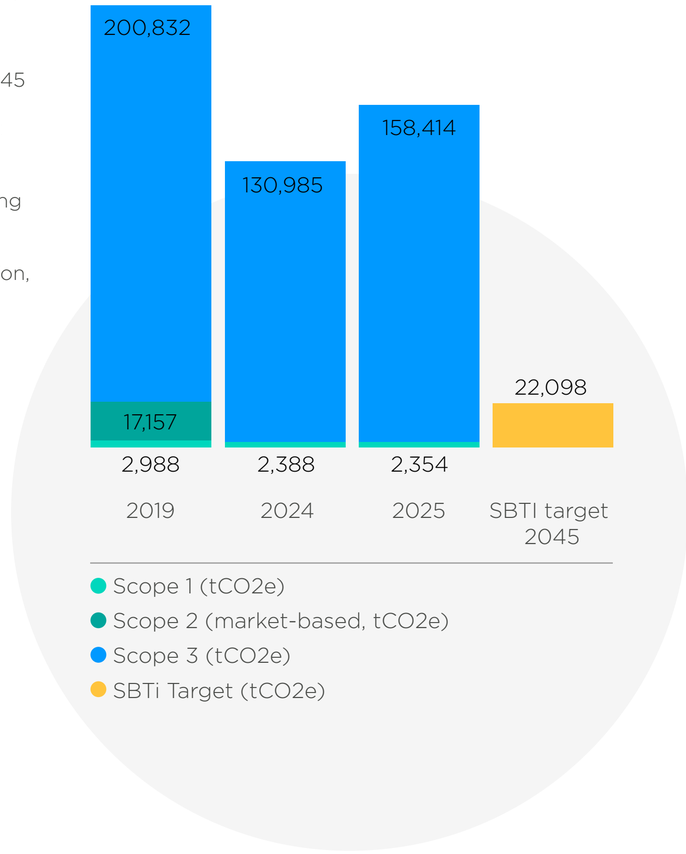


**Other includes Business Travel, Employee Commuting, Operational waste and waste water and FERA (Fuel and Energy Related Activities).*

Progress towards our Net Zero by 2045

Our long-term science-based target is to reach net zero by 2045. In 2025, we reduced our total Scope 1, 2 (market-based) and 3 emissions by 27% compared to the 2019 baseline.

Looking ahead, further progress toward the 2045 target will be increasingly driven by Scope 3 emissions, which represent the majority of Colt DCS's total carbon footprint. The long-term decarbonisation pathway depends on the procurement of low-carbon materials, minimising embodied carbon in the designs of new developments, increasing renewable electricity coverage of sub-metered electricity consumption, and increased supplier and customer collaboration.



Towards zero waste to landfill

In line with our Zero Waste Policy, Colt DCS aims to minimise waste generation, maximise material recovery, and embed circular economy principles across both operations and development activities. Our approach combines robust operational practices with externally recognised certification to demonstrate progress toward zero waste to landfill.

Waste management

Colt DCS continues to strengthen its waste management approach by prioritising high-quality material recovery, responsible resource use, and continuous improvement across operational sites. As our portfolio expands, increased emphasis is placed on reducing waste at source and embedding circular-design principles into the development of new data centres. This includes recovering and recycling of materials such as steel and directing concrete for crushing and reuse where viable. These measures reduce waste generated during construction and improve material efficiency across the full asset lifecycle.

Operationally, Colt DCS applies clear segregation and management of waste streams to ensure materials such as metals, plastics, cardboard, food waste, and general waste are directed to the most appropriate recovery pathways. This site-level focus supports consistent performance across facilities and aligns with our Zero Waste Policy commitment to divert waste from landfill wherever possible.

To support scalable and consistent progress, Colt DCS applies a structured three stage approach toward zero waste:

Foundation stage

This stage establishes baseline requirements for all operational sites. Activities include collecting waste data, completing baseline assessments, implementing robust waste audits, setting site specific targets, and putting effective governance structures in place. The foundation stage builds the data and systems needed for meaningful performance improvement.

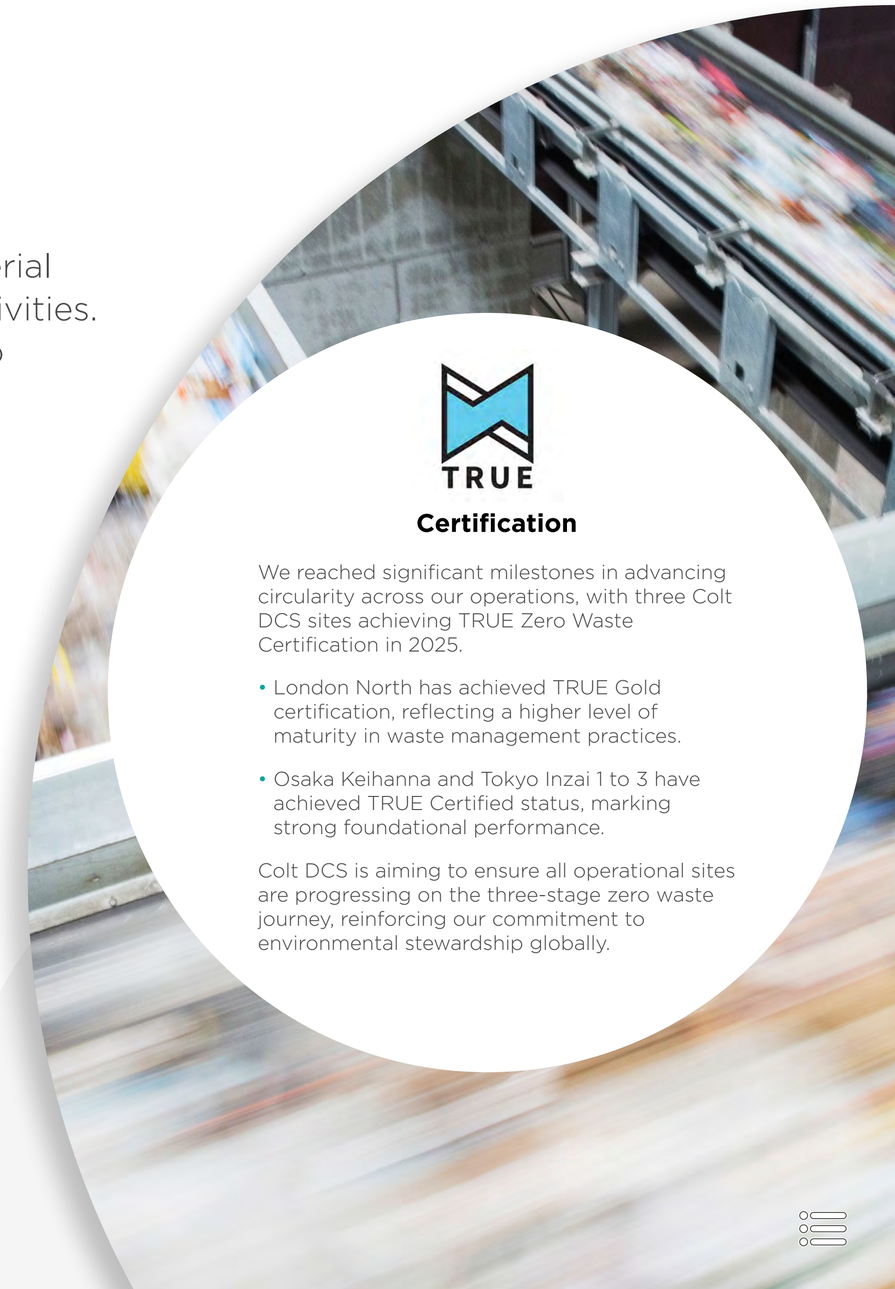
Certification stage

This stage represents the pathway toward **TRUE Certified status**. Sites focus on achieving and sustaining high waste diversion performance (typically above 90%) over a sustained period, supported by improved segregation, supplier engagement, and staff training. Certification under TRUE provides independent validation of performance and operational maturity.

Leadership stage

The leadership stage is intended for sites progressing beyond Certified status toward TRUE Silver or Gold. These sites demonstrate a higher level of maturity, focusing on closing remaining performance gaps, innovating in waste reduction, and embedding continuous improvement. Engagement at this stage shifts toward strategic optimisation rather than foundational controls.

This staged approach allows Colt DCS to accommodate differences in site maturity while maintaining a clear and consistent pathway toward zero waste across the global portfolio.



TRUE

Certification

We reached significant milestones in advancing circularity across our operations, with three Colt DCS sites achieving TRUE Zero Waste Certification in 2025.

- London North has achieved TRUE Gold certification, reflecting a higher level of maturity in waste management practices.
- Osaka Keihanna and Tokyo Inzai 1 to 3 have achieved TRUE Certified status, marking strong foundational performance.

Colt DCS is aiming to ensure all operational sites are progressing on the three-stage zero waste journey, reinforcing our commitment to environmental stewardship globally.

Ensuring a healthy and safe work environment

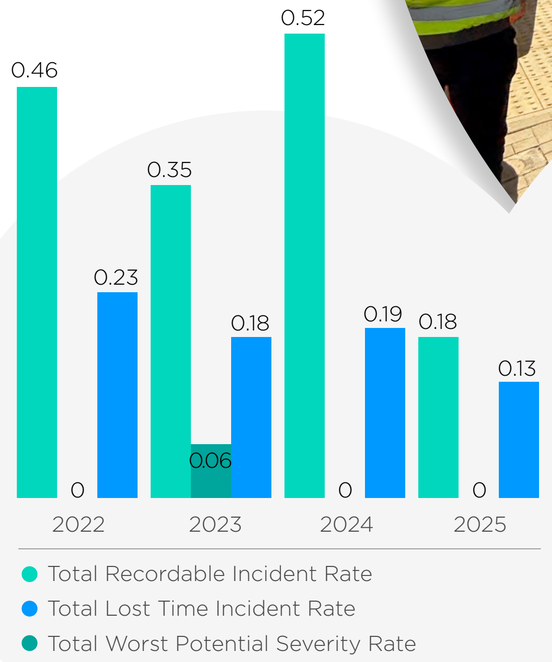
Our global Health, Safety and Environment (HSE) management system ensures we consistently create and maintain a healthy and safe working environment. As our global footprint grows and operational activity increases, a strong, proactive safety culture remains essential to ensuring that everyone working on or visiting our sites is protected from harm.

In line with the **Colt DCS Health and Safety Policy**, we continued to prioritise the health, safety and wellbeing of our colleagues, contractors and partners across our data centres, construction sites and offices. This year, we strengthened our safety management practices, reinforced behavioural expectations through targeted training, and continued embedding consistent global standards across operations and development projects. These efforts have contributed to a demonstrable improvement in safety performance across multiple indicators.

Our Total Recordable Incident Rate (TRIR) decreased significantly to 0.18, down from 0.52 in 2024, representing our strongest result in four years. This improvement reflects the effectiveness of enhanced risk controls, clearer Method Statements for high-risk activities, increased onsite supervision and more consistent reporting through established incident management systems.

In the event of a HSE incident, we strive to use this experience as an opportunity to learn and improve performance by focusing on our people and systems. We have developed a management system which is in line with ISO 45001 (occupational health and safety) in order to implement effective HSE controls, visible and committed leadership, reinforce a positive HSE culture, and develop competent personnel to make our business a success.

As we move into 2026, our focus remains on further embedding ISO 45001-aligned processes, driving continuous improvement through targeted training, and maintaining a strong culture of accountability, visibility and shared responsibility. Our ambition is to continue reducing risk, preventing incidents, and ensuring that everyone who works with us returns home safely each day.



Health and Safety Week at London Hayes Campus

Health and Safety Week is a vital initiative focused on promoting best practices, raising awareness, and introducing advancements in workplace safety. In collaboration with our general contractor, we delivered an engaging and impactful event with a range of activities designed to reinforce safety culture, including case studies, onsite demonstrations, and presentations to raise awareness on mental health. By celebrating Health and Safety Week, we reaffirm our commitment to achieving zero harm, ensuring a safer and more supportive work environment for all.

Our London 4 development also achieved a major milestone this year, recording over 1.3 million hours worked without a single lost-time incident. This achievement reflects the outstanding commitment to safety and collaboration with our general contractor and partners.

Managing Biodiversity and Air Quality

Colt DCS manages biodiversity and air quality impacts across its operational portfolio, recognising their importance for site resilience, environmental performance and the wellbeing of surrounding communities. While data centres are typically located in industrial environments, our approach focuses on minimising impacts while identifying opportunities to enhance environmental performance within operational constraints.

Managing Air Quality

Air quality is managed across the lifecycle of our developments, with a focus on reducing emissions and minimising local impacts during both construction and operation.

During construction, potential sources of air pollution such as dust, emissions from equipment, and volatile organic compounds (VOCs) from materials are identified and controlled through site management practices. These include dust suppression, the use of low-emission materials, ventilation controls, and the careful management of equipment and vehicle use.

Measures are also implemented to prevent the spread of pollutants beyond the site boundary, including controlling runoff, managing storage and handling of materials, and maintaining clean working areas.

Together, these practices help protect local air quality and reduce impacts on workers, neighbouring communities and the surrounding environment.

Managing Biodiversity

Biodiversity is managed at site level, particularly in urban and industrial environments where existing ecological value is often limited and opportunities for enhancement must be actively created.
Colt DCS integrates biodiversity considerations into both the design and operation of its data centres. This ensures that environmental performance is addressed alongside operational requirements, supporting the responsible management of natural resources and contributing to improved local environmental quality.

For new developments, ecological assessments are conducted to understand baseline biodiversity conditions and identify potential impacts. These assessments show that sites in highly urbanised or industrial areas are typically characterised by artificial or modified habitats, with relatively low ecological value and limited species diversity. Where nearby natural areas or designated sites are present, impacts are assessed and appropriate mitigation measures implemented to ensure they are not adversely affected.

Despite the constraints associated with highly urbanised and engineered environments, opportunities to enhance biodiversity are incorporated wherever possible. This includes integrating green infrastructure and habitat features into site design to support local species and improve ecological outcomes.

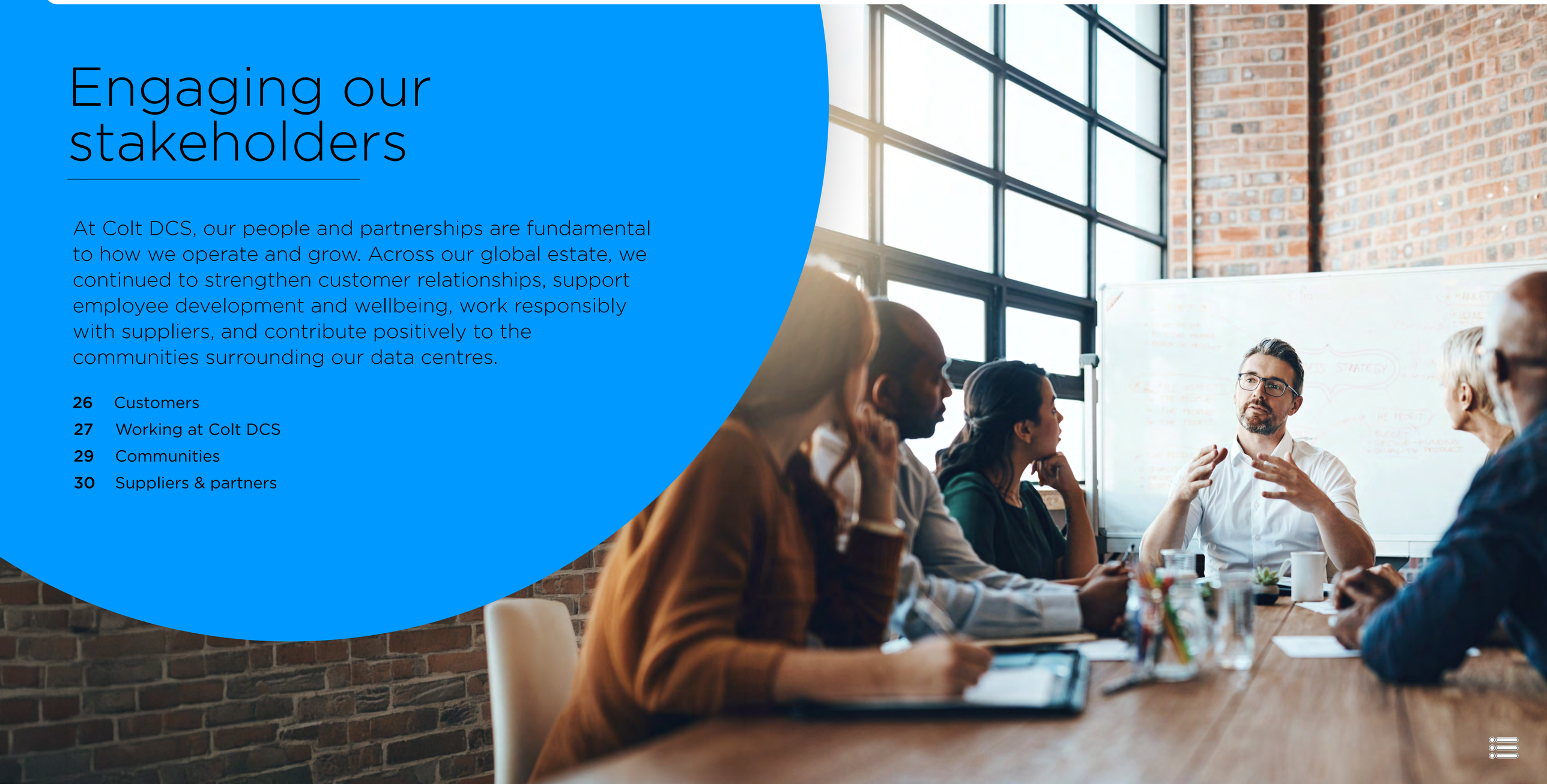
At the London 4 site, biodiversity measures form part of ongoing site management. Green walls, landscaped areas, and green and brown roof systems provide habitats for birds while improving visual integration with the surrounding environment. These measures are supported by soft planting and urban greening initiatives that contribute to more resilient and adaptable sites.

Where required, site-specific mitigation and enhancement measures are implemented to minimise environmental impacts. These include protecting existing ecological features, managing invasive species, and applying responsible landscaping practices. Ecological monitoring may also be carried out to track performance over time and ensure that measures remain effective.

Through this structured approach, Colt DCS aims to minimise impacts on biodiversity while contributing positively to the natural environment. This includes aligning with regulatory expectations, such as achieving at least 10% Biodiversity Net Gain (BNG) where applicable and supporting the enhancement of natural capital within the communities where we operate.

Engaging our stakeholders

At Colt DCS, our people and partnerships are fundamental to how we operate and grow. Across our global estate, we continued to strengthen customer relationships, support employee development and wellbeing, work responsibly with suppliers, and contribute positively to the communities surrounding our data centres.



Customers

This year, Colt DCS continued building on the structured approach introduced in previous years to deliver a consistent high-quality experience for our customers. Our efforts focused on strengthening governance, enhancing transparency, and improving the tools and processes customers rely on day-to-day. These developments support resilience, simplify interactions, and help ensure that customers experience a seamless and predictable service across regions.

Customer experience

Colt DCS continues to strengthen its position as the most trusted and customer centric operator in the data centre sector. This year we advanced our customer experience strategy through clearer governance, improved digital platforms, and enhanced operational transparency—directly supporting resilience, efficiency, and long-term customer partnerships.

1. Strengthened Customer Engagement Model

- Every customer now has a defined engagement path, with Service Managers coordinating closely with virtual teams for strategic accounts.
- Structured feedback cycles and a closed loop process with clear ownership, prioritisation, and tracked actions.

2. Customer Portal Enhancements

- Integrated a new Internal Performance Control approach, enabling customers to raise and track Health & Safety, Security, and Site observations in a single digital hub.
- Improvements have increased accountability, response speed, and consistency of service quality.

3. Real Time Operational Transparency

- Launched the Central Telemetry Platform (CTP). Providing near real time global telemetry, API access, and intuitive dashboards to support incident prevention, SLA validation, reporting efficiency, and metrics such as PUE.

4. Evolution of Customer Metrics

- Shifted measurement focus toward **effort based KPIs,** emphasising ease of doing business across onboarding, change, incidents, service requests, and billing.
- This embeds CX more deeply into performance management and drives practical friction removal.

Customer Focused Culture

A company-wide programme strengthened customer first behaviours through:

- Introduction to Customer Experience learning module within DCS Learning tool.
- Customer Focus Week, featuring global knowledge sharing.

Customer Feedback

Customer sentiment highlights trust in our operational resilience and partnership approach, with positive feedback from major global technology and financial services customers.

Working at Colt DCS

In 2025, Colt DCS continued strengthening its position as an employer of choice by investing in the culture, capability and wellbeing of its people. As the organisation evolves and prepares for long-term independence, colleagues played a vital role in shaping a workplace defined by trust, transparency and shared purpose. Our People & Culture agenda focused on empowerment, development, inclusion and health, ensuring Colt DCS remains a place where individuals and teams feel supported, valued and equipped to thrive.

MyLearningHub

Colt DCS launched MyLearningHub in November 2024 as a key enabler of long-term talent development. The platform provides a personalised, skills-based learning ecosystem that helps colleagues understand, measure and build the capabilities needed in a fast changing digital infrastructure environment.

MyLearningHub
Master your skills, own your development

Partnering with Degreed, a leading skills intelligence platform, Colt DCS delivered scalable, tailored learning experiences that empower colleagues to drive their own development. Engagement was exceptional, in just 10 months we achieved:

- **71% active learner rate** in the first ten months, exceeding the goal set for the end of 2025 which was 65%.
- **4,620 courses completed in 2025** an average of 24 courses per employee.
- **Skills** developed across collaboration, customer focus, emotional intelligence, leadership, growth mindset and more.

DCS sustains a strong learner engagement across the company. This learning culture was reinforced throughout the year by:

- **Brain Booster webinars**
- **Learning of the Month resources**
- **In-person workshops** across global sites
- **Sustainability Week**, **Customer Focus Week** and **Learning at Work Week**

Together, these initiatives help to embed continuous learning across the organisation and ensure employees have the tools to futureproof their skills and drive their ongoing development at DCS.

People That Matter

At Colt DCS, fostering a workplace where employees feel heard, valued and empowered is central to our ESG strategy. In 2025, this commitment was reflected in record engagement levels, strong cultural indicators and meaningful progress in development, wellbeing and inclusion. Taken together, these results indicate that colleagues feel safe to speak up, confident in their teams and leaders, and comfortable bringing their full selves to work. They also reflect a continued strengthening of day-to-day relationships and a more connected, cohesive organisational culture.

Employees highlighted opportunities for continued improvement, including simplifying workflows, increasing clarity on development pathways, improving consistency of tools and processes, and strengthening communication and cross team alignment. These insights guide our People & Culture priorities for 2026, ensuring our ways of working evolve in line with colleague needs.

Great Place to Work Certification & Best Workplaces Recognition

Colt DCS achieved Great Place to Work certification in 2025, reflecting strong colleague trust, wellbeing and confidence in leadership. The certification is based on the Great Place to Work Trust Index, which assesses workplace experience across safety, fairness, inclusion, integrity and leadership credibility.

Survey results from the Great Place to Work Trust Index showed outstanding sentiment in key areas:

- **92%** believe Colt DCS is a great place to work
- **97%** agree leadership behaves honestly and ethically
- **99%** feel Colt DCS provides a physically safe environment
- **96–97%** report fairness across gender identity and sexual orientation

These results affirm the strength of our inclusive culture, ethical leadership and commitment to wellbeing. This achievement positioned Colt DCS among industry leading employers and contributed to listings across several Best Workplaces 2025 categories:

- **#64 Best Workplaces for Women**
- **#50 Best Workplaces for Development**
- **#26 Best Workplaces for Wellbeing**
- **Best Workplaces in Construction, Engineering & Property**

These recognitions reaffirm Colt DCS's progress in creating an inclusive, supportive workplace that promotes wellbeing, capability growth and long-term career development.

Award Highlight: Best Talent Developer – Data Centre World 2025

In 2025, Colt DCS proudly received the "Best Talent Developer" Award at Data Centre World London. This award recognised the structured and innovative approach Colt DCS has taken to building talent and supporting career progression. This highlighted several key initiatives that underpin our development strategy:

- **AIM Framework** – supporting career activation, cultural integration and performance motivation
- **MyLearningHub** – enabling personalised, skills-based learning at scale
- **Management Matters** – strengthening people leadership skills
- **Mentor U** – supporting capability building and cross-regional knowledge sharing
- **AI-enabled learning platform features** – offering intelligent recommendations and targeted development pathways

This award reflects the strength of our talent strategy and our commitment to creating a learning-rich environment where every colleague can grow and succeed.

Communities

Community Engagement

Hayes Canal Festival

Colt DCS, with our London 4 data centre construction partner T Clarke, sponsored the Hayes Canal Festival for the third consecutive year in 2025, reinforcing our commitment to sustainable, inclusive communities. The event welcomed 3,000 residents, offering activities including canoeing, paddle boarding and boat rides, promoting appreciation of the canal. Delivered by Canal & River Trust London & South East with local partners, it supported wellbeing, social connection and responsible stewardship of shared natural spaces.

Community Education

At Osaka Keihanna

Colt DCS employees participated in the Keihanna Science Festival, hosting a hands-on educational workshop for local children on the theme “Create, Use, and Learn Electricity.” Through practical demonstrations, the session helped introduce basic science and energy concepts in an accessible way. This involvement supported learning opportunities for young people and reinforced the organisation’s commitment to contributing to local educational initiatives.

Shiba Park Clean-up Walk

At Roppongi

Colleagues from the Roppongi Izumi Garden Office undertook a 1.6 km clean-up walk to Shiba Park, collecting litter along public walkways in high summer temperatures. The activity contributed to the upkeep of shared urban spaces and provided an opportunity for employees to support community cleanliness and interact positively with other park users.

Global Clean-up

Real Estate Teams in Action

Across the globe, teams led impactful community clean up initiatives. In the UK, 30 colleagues collected 30-40 bags of litter at Minet Park in Hayes. Our French team cleaned Parc Léon Salagnac with city support, while Germany hosted a sunny Frankfurt clean-up. In India, teams combined litter picking with tree planting ,supporting biodiversity.

These activities provided an opportunity to give backto the community, enhance the local environment, and strengthen engagement among colleagues through a shared sense of purpose.

Environmental and Community Activities

At Mumbai

In India, colleagues participated in a range of environmental activities focused on improving local surroundings, including litter collection and tree planting initiatives. These efforts contributed to creating a cleaner and greener environment while promoting awareness of sustainability and biodiversity within the workplace and surrounding communities.

Suppliers & Partners

In 2025, we continued advancing our efforts to map our supply chain and monitor compliance with our labour, environmental and ethical standards. Achieving our 2045 net zero target requires close collaboration with our suppliers and industry partners to reduce Scope 3 emissions, and this remains a central focus of our approach.

Our expectations for suppliers are reflected in our Supplier Code of Conduct, which is aligned with the principles of our Code of Business Conduct. These standards guide our suppliers on ethical behaviour, human rights, environmental protection and responsible business practices.

Guided by the Colt Group Sustainable Procurement Policy, sustainability criteria are integrated into supplier selection, management and ongoing evaluation. Our Request for Proposal (RFP) scoring continues to incorporate ESG performance, and our Vendor Risk Management (VRM) process assesses a broad range of ESG risks, including environmental management, health and safety, anti-bribery and corruption, data protection, cyber security, human rights and modern slavery.

In 2025, we strengthened our due-diligence approach by lowering the VRM threshold for new suppliers from €50k to €10k. This change significantly expanded the number of suppliers covered by full ESG assessment and increased our oversight across a larger portion of our supply chain. Existing suppliers continue to be reassessed at contract renewal, and ESG performance remains a standing agenda item within our Quarterly Business Reviews.

Governance

Good governance and responsible business practices enable us to maintain consistency across our operations and meet stakeholder expectations, as well as comply with regulations and our own commitments.

Responsible business conduct

Good governance and responsible business practices enable us to maintain consistency across our operations and meet stakeholder expectations, as well as comply with regulations and our own commitments.

Governance

We are fully committed to a clear governance structure to help us deliver our ESG strategy and meet our targets. Since its launch in 2023, the DCS Board has reviewed and approved the ESG strategy. The Audit Committee and the Remuneration Committee members are exclusively non-executive directors.

The ESG Steering Committee and Governance Committee were constituted in 2024 to support the Executive Leadership Team (ELT). The ESG Steering Committee oversees the strategic direction and execution of the ESG strategy. It is an executive level Committee chaired by the Director of Energy & Sustainability and is responsible for agreeing and approving the global ESG strategy and policies, and for the delivery against annual targets.

The ESG Steering Committee covers issues including climate change, water, waste, biodiversity, employees, supplier engagement, community engagement, transparency and corporate governance. Performance data across these topics is generated every quarter and progress is shared with internal stakeholders.

The Governance Committee is responsible for global governance, compliance and risk management, including all matters, which fall under the Code of Business Conduct and DCS Compliance Framework, as delegated by the ELT. It acts as a central function that oversees and integrates all governance activities across DCS, reporting quarterly to the Audit Committee.

Business ethics

Our Code of Business Conduct sets out the way we do business. It covers our standards and commitments towards ethical conduct, anti-corruption, anti-bribery, anti-fraud, conflicts of interest, whistle-blowing and legal compliance.

Our policy is to instil a true culture of compliance with all laws, rules and regulations wherever we do business, to ensure we run our business to the highest ethical standards as well as meeting our legal obligations. Each person acting for Colt DCS has a responsibility to comply with all relevant standards and all employees are required to complete mandatory training on the Code of Business Conduct annually.

We encourage employees to raise breaches of the Code of Business Conduct through the independent Business Ethics Line or by reporting to the Governance Committee. We have the structures in place for anonymous whistleblowing wherever it is permitted by local law. The Governance Committee is responsible for reviewing any suspected compliance breaches. The Committee runs awareness campaigns about the importance of ethical behaviour and adherence to the Code of Business Conduct and how employees can report actual or suspected breaches of the Code of Business Conduct. The Audit Committee oversees the Governance Committee regarding actual or suspected breaches of the Code.

Security

In 2025, Colt DCS continued to strengthen the security of its global data centre estate, reflecting both the growth of the business and increasing operational responsibility. Maintaining robust security controls remains essential to protecting our people, customers and critical infrastructure, and ensuring our operations meet the highest industry standards.

Our data centre estate continues to hold ISO 27001 and SOC 2 Type II certifications, providing independent assurance that our information security and operational control processes are designed and operated effectively. In 2025, we achieved ISO 27001 certification for our latest Asia data centre, further expanding our certified estate. Specific data centres also maintained PCI-DSS compliance, where required contractually by customers.

Physical security

Our Security & Resilience team are responsible for ensuring that our employees, customers, suppliers and any other on-site visitors can work in a secure environment and that the confidentiality, integrity and availability of physical data centre infrastructure remains protected. This encompasses operational compliance with our security policies and ensures that the appropriate standards, procedures, processes and systems are in place. This includes the central management of security systems, security design, and security standards to guarantee an efficient approach is delivered across all countries, and that the central governance function ensures that our security standards, policies, and procedures are maintained.

The team also provides governance and auditing of local site Standard Operating Procedures (SOPs), ensuring that global security requirements are consistently applied and adhered to.

The control of access to our sites and facilities is achieved through a combination of physical security controls, and defence in depth layered security model. In addition, Integrated Security Systems AACS, IDS, PIDS, CCTV, and AMPS are central to our approach. Physical access to Colt DCS facilities is managed through a combination of physical controls and Automatic Access Control Systems (AACS), enabling effective management of access rights and ensuring strict oversight of who enters our sites.

Cyber security

Colt DCS places great importance on the protection of services provided to our customers and uses the National Institute of Science and Technology Cyber Security Framework (NIST CSF) as a foundation for our information security management system.

Our in-house security and technical teams work together to identify, implement and operate security safeguards. Oversight of control effectiveness is exercised through continual monitoring and reporting to senior management. Where vulnerabilities or weaknesses are discovered, prompt action is taken to mitigate risk.

In addition, we have partnered with industry-leading cyber security suppliers to monitor activity on our networks. With staff employed 24/7, 365 days a year, we have the right teams in place to detect anomalous activity, carry out initial assessments, and escalate suspicious events. If a confirmed security incident is detected, we will quickly isolate affected assets and work with industry experts to prevent a recurrence.

Training and awareness

All employees must complete the Essentials Security Awareness training, equipping them with the knowledge to recognise threats and act appropriately to protect the business. In 2025, we continued to reinforce awareness through regular updates and expert sessions across the organisation.

Risk management

Colt DCS applies an Enterprise Risk Management (ERM) Framework to evaluate and manage risks across the organisation. Our approach is guided by ISO 31000, following a structured cycle of establishing context, identifying risks, assessing risks, implementing controls and ongoing monitoring.

In 2025, we continued embedding the Risk Policy & Procedure introduced for Colt DCS in 2024, strengthening risk governance during a period of strategic transformation. Risk oversight includes sustainability-related risks captured through function-specific risk registers and the ESG risk register. Where relevant, project-level risk registers also incorporate ESG and operational risks.

Ownership of the ERM process sits with the Colt DCS Governance Committee, supported by the Colt DCS Risk function. The Risk function works across all areas of the business to identify emerging risks, evaluate potential impacts and ensure risks are managed in line with organisational expectations. Operational and strategic risks are reported to the Executive Leadership Team, Governance Committee and Audit Committee, ensuring visibility and alignment across all senior management levels.

Our risk management process comprises four stages:

1. **Identify risks** – understanding strategic and operational context
2. **Assess risks** – evaluating materiality, including likelihood, impact and proximity
3. **Risk response** – selecting and implementing appropriate mitigation
4. **Monitor & control** – ensuring risks are reviewed regularly and controls remain effective and updated

Climate-related risks

Colt DCS's climate risk analysis uses insights from the Network for Greening the Financial System (NGFS) and updated scenario modelling. Our climate risk assessment considers temperature rise, flooding and carbon pricing, and supports mandatory climate-related financial disclosures.

Environmental, Health and Safety-related risks

To support safe operations, Colt DCS maintains risk assessments covering activities such as construction site work, operational site visits, office working, remote working and travel. These assessments help ensure that the organisation maintains a safe and resilient working environment across all global location.

Annex

Table 1
Energy Consumption (Absolute Values, kWh)

Metric	2025	2024	2023
Total Energy Consumption	901,862,198	775,262,057	662,784,371
Total Electricity Consumption	897,261,198	770,882,395	658,170,077
Scope 2 Energy	70,612,937	118,163,334	89,916,210
Scope 3 Energy	826,648,260	652,719,060	568,253,867
Total Renewable Energy	815,123,067	691,490,109	542,621,679

Table 2
Renewable Energy (%)

Metric	2025	2024	2023
Total Renewable Energy (%)	90%	89%	82%
Non-Renewable Energy (%)	10%	11%	18%
Scope 3 Contribution to Total Energy (%)	82%	74%	73%
Scope 2 Contribution to Total Energy (%)	8%	15%	9%
Scope 3 Renewable (%)	90%	88%	85%
Scope 2 Renewable (%)	100%	100%	63%

Table 3
Data Centre Efficiency (KPI)

Metric	2025	2024	2023
Power Usage Effectiveness (PUE)	1.41	1.41	

Table 4
Environmental, Health and Safety data

EHS	2025	2024	2023	2022
Total Recordable Incident Rate	0.18	0.52	0.35	0.46
Total Worst Potential Severity Rate	0	0	0.06	0
Total Lost Time Incident Rate	0.13	0.19	0.18	0.23

Table 5
Generated waste by treatment type (kg)

Waste Treatment Type	2025	2024
WTE	91,059	54,113
Recycled	260,782	502,752
Reused	17,963	64,545
Anaerobically digested	4,603	2,590
Landfill	5,687	344
Reduced		3,230
Compost off-site		590
Total	380,094	628,164

Note: Data presented includes all sites operational during the year. These operational boundaries form the basis of the GHG emissions calculations.

Table 6
Absolute GHG emissions (location- and market-based) in tonnes of CO2e

Category	2025 Emissions	2024 Emissions	2019 Emissions
Scope 1	2,354	2,388	2,988
Fuel	1,283	1,155	821
Refrigerants	1,070	1,231	1,803
Company Vehicle	0	0	43
Natural Gas	0	0	320
Scope 2			
Market-based	0	0	17,157
Location-based	*22,122	34,013	56,542
Scope 1 + Scope 2 (Location-Based)	**24,476**	**36,401**	**59,530**
Scope 1 + Scope 2 (Market-Based)	**2,354**	**2,388**	**20,145**
Purchase Good & Services	13,325	8,420	48,438
Capital Goods	105,888	76,786	40,281
Downstream Leased Assets	36,984	36,282	97,938
Business Travel	480	645	302
Employee Commuting	194	216	313
Waste & Water	81	70	162
FERA	1,462	8,566	13,398
Scope 3	**158,414**	**130,985**	**200,832**
Total Emissions (Location-Based)	**182,890**	**167,386**	**260,362**
Total Emissions (Market-Based)	**160,768**	**133,373**	**220,977**

**Note that the decrease in Scope 2 location-based emissions is primarily driven by grid decarbonisation across the regions in which Colt DCS operates, alongside improvements in the accuracy of sub-metered electricity data at data centre sites. Enhanced data quality has resulted in a more precise allocation of electricity consumption between Colt DCS Scope 2 emissions and Scope 3 (Downstream Leased Assets).*

Figures are presented to the nearest tCO_2e; totals may differ by up to ±2 tCO_2e due to rounding.

Annex – Greenhouse Gas emissions Methodology

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

Standard and supporting standards:

- **Scope 1 emissions** – WRI/WBCSD: GHG Protocol: A Corporate Accounting and Reporting Standard, Revised Edition (the GHG Protocol)
- **Scope 2 emissions** – WRI: GHG Protocol Scope 2 Guidance: An Amendment to the GHG Protocol Corporate Standard
- **Scope 3 emissions** – WRI: GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard

Colt DCS consolidates its organisational boundary according to the operational control approach, which includes all assets that have an environmental impact over which the Group has operational control. This means having full authority to introduce and implement operating policies.

Colt DCS GHG emissions cover the following categories:

- **Scope 1:** Natural gas, fuel from own fleet, refrigerants, and other fuel (from generator use) consumption
- **Scope 2:** Electricity consumption at our operated data centres
- **Scope 3:** Purchased goods and services, capital goods, fuel and energy-related activities (FERA), waste generated in operations, business travel, employee commuting and downstream leased assets (DLA)
- **Emission factors used:**

a. BEIS (DEFRA) 2025, 2024, 2023 and 2019 for Scope 1 across Colt DCS, Scope 2 in the UK, and the following Scope 3 categories – FERA, waste, business travel and employee commuting

b. Electricity emission factors are based on IEA (2025), using 2023 as the latest complete dataset for countries in which Colt DCS operates. Additionally, IEA emission factors were used for 2024, 2023 and 2019 Scope 2 electricity in Europe and Asia, and Scope 3 categories (homeworking, DLA and FERA)

c. Transition from Carbon Trust EEIO emission factors to CEDA emission factors for Scope 3 spend-based GHG emission calculations in 2025, 2024, 2023 and 2019

d. PG&S and Capital Goods supplier specific-emissions factors were applied for all spend relating to selected suppliers

Data Accuracy:

In 2025, Colt DCS updated the way Scope 2 electricity is calculated to improve accuracy. This change addresses how electricity is allocated between Scope 2 and Scope 3. An adjusted approach was applied to better reflect actual annual consumption and to ensure consistent reporting. This improvement strengthens the reliability of Scope 2 emissions data.

Restatements on Colt DCS GHG emissions reported in 2024:

- Spend-based calculations in Scope 3 (2019, 2023 and 2024) were restated due to an update on emission factors. We have moved from EEIO provided by the Carbon Trust to CEDA emission factors.

The 2019 baseline emissions have been reallocated to reflect changes in organisational boundaries; progress on targets is assessed against the updated base year.