

2024 Sustainability
Highlights Report

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About this report

This Sustainability Highlights report covers the period 1 January to 31 December 2024, unless otherwise stated. The report includes sustainability performance data across our environmental, social and governance material topics identified and prioritised as part of the Double Materiality Assessment conducted in 2024. This report 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 FY24, unless otherwise stated. In 2024, the first completed phases of two new sites were included in the report: Osaka Keihanna, a 45 MW data centre in Japan, and Mumbai, a 134 MW data centre campus in India. 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 FY25, 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 (Cat 2) emissions and employee-related metrics
- ✗ excluded from report scope

	Site name	FY24	FY25
Europe	London North	✓	✓
	London West	✓	✓
	Frankfurt City	✓	✓
	Rotterdam	✓	✓
	Paris South West	✓	✓
	Paris 2 - 6	🔄	🔄
	London Hayes Campus (4-8)	🔄	🔄
	Frankfurt 2	✗	✗
	Frankfurt 3	🔄	🔄
	Frankfurt 4 & 5	🔄	🔄
Japan	Berlin 1 & 2	🔄	🔄
	Tokyo Inzai 1	✓	✓
	Tokyo Inzai 2	✓	✓
	Tokyo Inzai 3	✓	✓
	Tokyo Shiohama	✓	✓
	Osaka Keihanna	✓ - NEW	✓
	Tokyo Inzai 4	🔄	✓ - NEW
	Tokyo Inzai 5	🔄	🔄
	Tokyo Yoshikawa 1, 2	🔄	🔄
India	Mumbai	✓ - NEW	✓
	Chennai	🔄	🔄

Message from our CEO

For Colt DCS, 2024 was a year of significant growth. When we started our hyperscale journey nine years ago, the cloud market was \$111b. Today, it is over \$760b and is projected to grow even further due to the rising demand in streaming, cloud and artificial intelligence tools and services.



We are expanding our capacity worldwide, from London, Paris, Berlin and Frankfurt to Tokyo, Osaka, Mumbai and Chennai. To accelerate our growth plans in India, Colt DCS signed a joint venture partnership with RMZ this year, one of the world's largest family-owned alternative asset owners with 20 years' experience in developing, owning and operating high quality infrastructure in high growth Indian markets. This partnership will provide opportunity to further accelerate the development of our existing sites in Mumbai and Chennai, and scope for an additional site to be added in the future.

I'm especially proud that we were able to help our customers scale and accelerate during this time of transformation by staying true to our core values: trust, respect, unite, sustain and trailblaze. Our values do not only form the foundation for how we serve customers and build relationships, but also help us develop innovative solutions to meet our sustainability commitments.

“ I'm deeply grateful for the support and trust from our customers, suppliers, partners, communities and colleagues in this journey. ”

This year, we matched 100 % of our annual electricity consumption globally with renewable electricity certificates, and we aim to maintain this achievement in the years ahead. We also continue to work closely with our hyperscale customers, who are already among the world's leading corporate purchasers of renewable power, to drive further investment in clean electricity for our data centres. This will get us even closer to our target to become a Net Zero carbon company by 2045.

At the same time, we made significant strides towards our ambition to become an employer of choice. With the launch of MyLearningHub, the MentorU programme and the annual TRUST Guru awards, we hope to empower our colleagues and create a work environment in which they are celebrated for their outstanding contributions.

Even though the data centre industry has grown significantly, the year 2024 turned out to be a challenging year for the industry due to rising demand in capacity, growing concerns about environmental impacts and far-reaching regulatory requirements. And while the pressures continue, we remain confident that we can be a key contributor in working towards a sustainable and viable build-out of the industry in the years to come.

Niclas Sanfridsson
CEO
Colt Data Centre Services



About Colt Data Centre Services

Colt DCS provides data centre solutions to some of the largest Cloud Service Providers and Enterprise businesses across 13 operational data centres, with an additional 19 in development across Europe and APAC (as per FY25).

Colt DCS is part of Colt Group Holdings Ltd. which is wholly-owned by Fidelity, but is run independently and outside of Fidelity Investments. Our services in the design, build, delivery and operational management of hyperscale data centres allow our customers the freedom to plan effectively for the growth of their business, knowing that their data centre strategy is ready for the demands of tomorrow.

Our mission is to become the most trusted and customer-centric data centre operator. It exemplifies our commitment to the highest customer excellence standards and is used as a framework to deliver long-term sustainable and profitable growth.

Strategic partnerships

We have two active joint ventures operational in the APAC region. For Colt DCS, these partnerships create avenues for new development opportunities and provide market access to local expertise and market intelligence. For our customers, these partnerships provide available IT capacity in desired locations, accompanied with a customer experience that is second-to-none.

Awards and certification

We are proud to have our employee and sustainability initiatives recognised by leading benchmark and awards organisations.

We were awarded the 'Best Colocation Provider Sustainability Innovation of the Year' Award at the 2024 DCS Awards

Colt DCS was proud to be shortlisted for the 'Data Center Workforce Initiative of the Year' at this year's Datacenter Dynamics Awards

ISO 14001 Environmental Management (in Europe and UK)

Colt Group received a Platinum Score for its EcoVadis submission

ISO 50001 Energy Management (Paris South West)

SOC 2 Type II (Globally)

ISO 27001 Information Security (Globally)

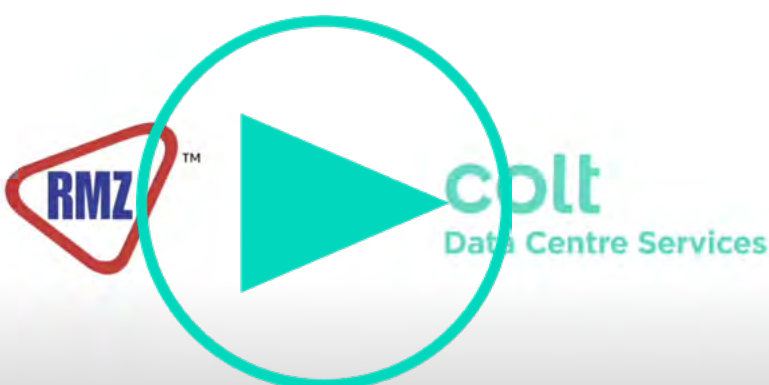
A complete description of the services we provide and our locations, are provided on our [website](#).

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

In 2021, Fidelity 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.



2024 in a glance

32%

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

1.41

Global PUE

100%

Renewable electricity procurement globally in Scope 2

95%

of waste diverted from landfill at London North (UK), and 5 other sites in Europe and Japan improving their diversion rates

75

Global NPS Score (74 in 2023)

87%

of employees would recommend Colt DCS as a great place to work (83% in 2023)

MyLearningHub

was launched to support continuous learning and professional development

91%

of suppliers by emissions have science-based climate targets in place

Best Colocation Provider Sustainability Innovation

of the Year award received at the Data Centre Solutions Awards for our ESG Strategy

Platinum

EcoVadis score for Colt Group

ISO27001

Information Security Management System certification achieved (in line with the latest version of the Standard)

ISO14001

Environmental Management System certification achieved in Europe and UK

Double Materiality Assessment

In 2024, Colt Group Holdings conducted a double materiality assessment (DMA) in line with the requirements of the EU’s Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS).

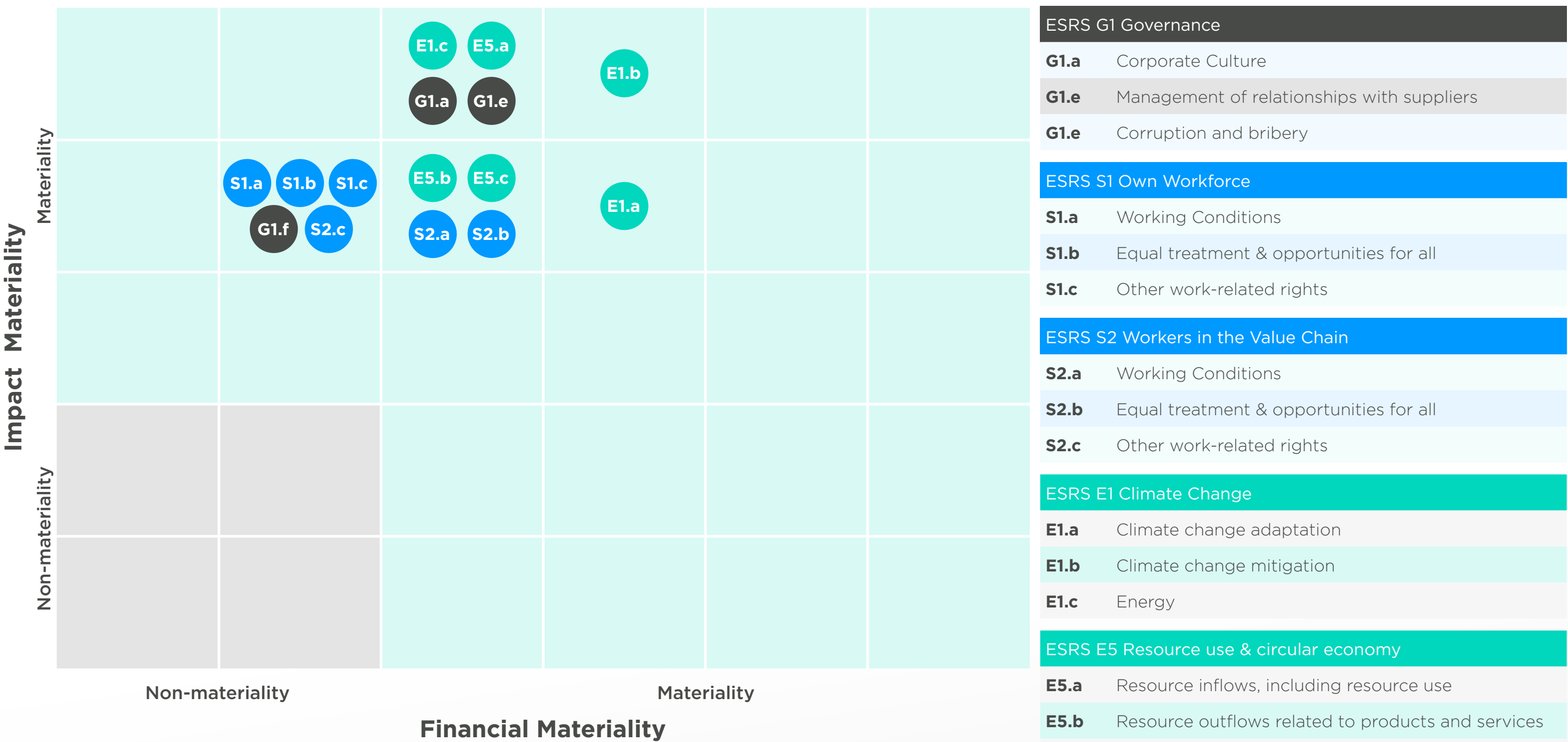
The purpose of the DMA is to evaluate the actual and potential sustainability impacts from two perspectives: financial and non-financial. This means that it looks at how material issues impact the business’ financial performance and how the business’ operations impact society and the environment. The identification and prioritisation of these material topics enables us to disclose relevant information that is necessary for understanding our sustainability risks, opportunities, and impacts.

The scope of the DMA covers our own operations as well as our upstream and downstream value chain. We engaged with external stakeholders through interviews, including employees, customers, partners, suppliers, investors, NGOs, and subject matter experts in the arena of sustainability for the digital infrastructure industry. We also conducted workshops and interviews with internal employees from a variety of business lines and staff functions. We used their input to score impacts based on severity, scale, scope, irremediability, and likelihood for impact materiality and magnitude and likelihood for financial materiality.

The DMA findings

As visualised in the matrix, five ESRS topics, broken down into 15 sub-topics, have been identified as double material, i.e. they are material from an environmental/ social impact and from a financial perspective. The results of the DMA have confirmed our focus on the three strategic ESG priorities and their associated actions and targets: Decarbonising our business, Connecting people, and Safeguarding our company.

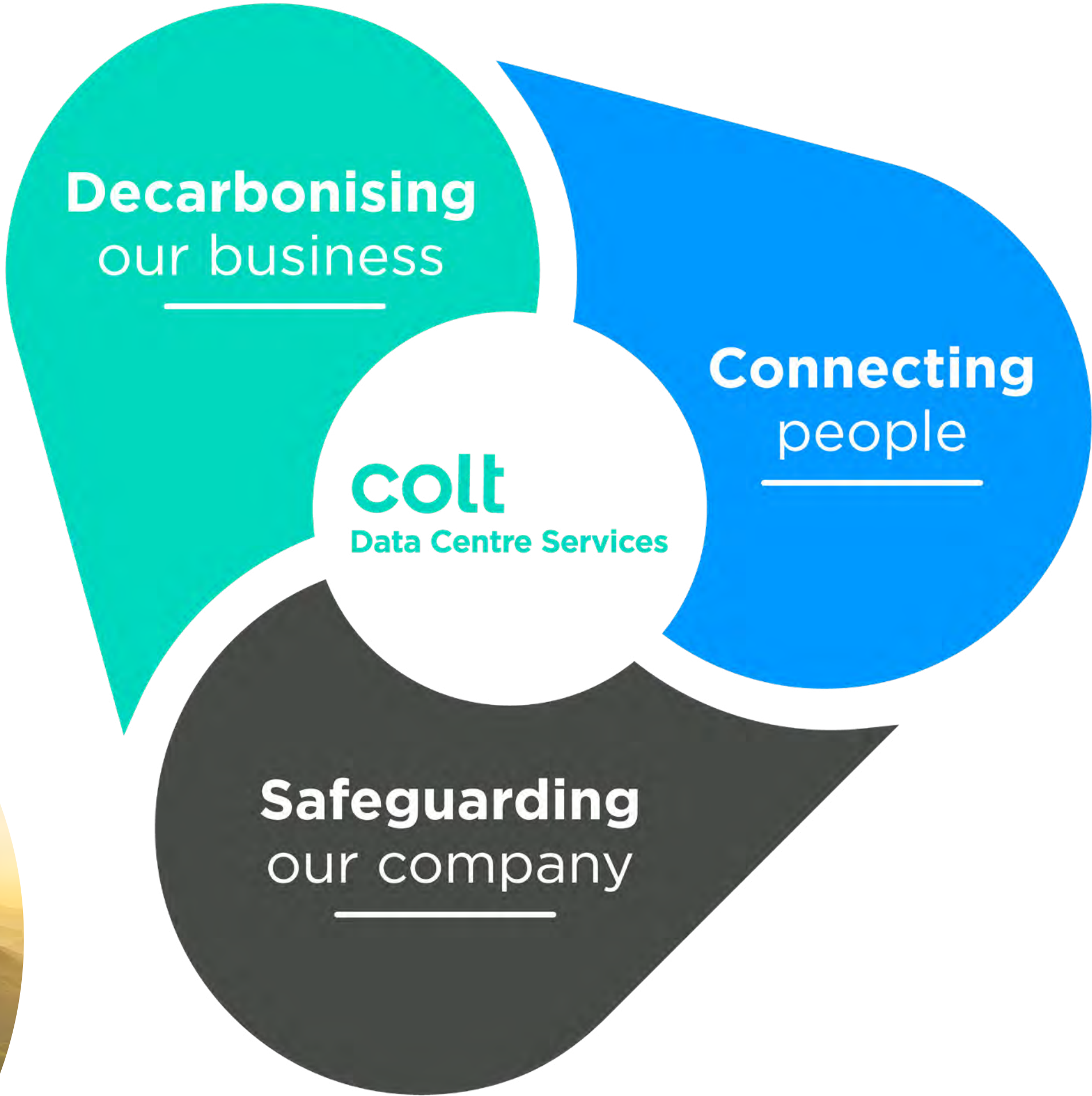
More information on the DMA can be found in the [2024 Group Sustainability Report](#).



Our approach to sustainability

At Colt DCS, we believe in building a sustainable hyperscale data centre future.

Our environmental, social and governance (ESG) strategy is an integrated part of our long-term growth direction that outlines goals and actions across three strategic priorities: Decarbonising our business, Connecting people and Safeguarding our company.



Decarbonising our business

At Colt DCS, we focus our efforts on scaling our business, while delivering on our commitment to become a net zero carbon company by 2045.

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Our commitment to the environment

At Colt DCS, we are scaling our operations globally while delivering on our environmental commitments. As part of our long-term strategy, we aim to become a net zero carbon company by 2045. Our sustainability programme focuses on reducing emissions, improving energy and water efficiency, enhancing circularity, and protecting biodiversity across our portfolio.

Our operations

Colt DCS operates 13 data centres across 11 cities in Europe and the Asia-Pacific region and has 19 further facilities in construction or advanced design (as per FY25). Data centres provide the resilient physical environment in which customers' servers run. Because we are a colocation operator, the bulk of electricity consumed on our campuses powers customer IT equipment.

As outlined in the [Global Environmental Policy](#), our responsibility is to engineer and operate the supporting plant - power distribution, cooling, controls and back up systems - as efficiently as possible. Every avoidable kilowatt lost in transformers, UPSs or chillers becomes waste heat that must be removed, driving up energy demand further. By targeting best in class infrastructure efficiency we cut both our own emissions and those attributable to our customers' workloads.

Our sites in Europe and the UK are compliant with ISO 14001 (Environmental Management System) and the Paris South West site in France is certified with ISO 50001 (Energy Management System).

New developments

We are committed to scale responsibly while progressing towards net zero carbon by 2045. The Global Reference Design (GRD) document was developed to standardise the design of our new data centres. We strive to design all new facilities with renewable electricity supply, high energy efficient cooling systems and, where local infrastructure allows, waste heat recovery. Additionally, we'll aim to achieve BREEAM Excellent or LEED Gold for all new developments in Europe and the UK. In 2025, we're looking to update the GRD in line with best practices in the industry and national regulations and frameworks.

The remainder of this environmental section details our performance on greenhouse gas (GHG) emissions, energy, waste, water, and biodiversity.

Levers	
Greenhouse Gas Emissions	<ul style="list-style-type: none">• Improve detection of refrigerant leakages• Low GWP refrigerants• Sustainable Procurement
Energy	<ul style="list-style-type: none">• Procure 100% renewable electricity• Energy efficiency measures• EV charging points• On-site solar panels• Integrate Energy and Environmental Management Systems (ISO 50001, ISO 14001)• Submeters across major electrical systems
Water, waste and biodiversity	<ul style="list-style-type: none">• Green building certification• Strive towards 90% waste diversion from landfill• Rainwater harvesting• Biodiversity Net Gain of at least 10%

Paris 2

≤ 1.2
Targeted
annualised PUE

39.6
MW IT

50,000m²
Gross site area

Paris 2 is the first of five new data centres being developed in France. Combined, this will bring our total capacity to 170MW in France by the end of the decade.

Paris 2 has secured 100% renewable power and is designed to meet the cooling demands of high-density AI workloads through a hybrid approach that combines traditional air cooling with liquid-to-chip technology. During the cooling process, there is zero water waste, and it has the ability to recover waste heat for use by the local community. Once fully operational, the AI-ready data centre will deliver 40MW with the ability to accommodate over 100kW of IT power per single cabinet.

Paris 2 is giving back to the community. Through being constructed entirely from building equipment and materials sourced from Europe, 350-400 people are expected to be employed during construction. The project emphasises our role as a trusted data centre partner, enabling our customers to efficiently deliver first-class AI solutions in a secure and sustainable environment.

Key features:

- 100% renewable electricity procurement
- Water-free cooling system
- Exploring waste heat reuse
- 30% of the roof surface must be green roof or equipped with solar panels
- EV charging points
- At least 10% Biodiversity Net Gain

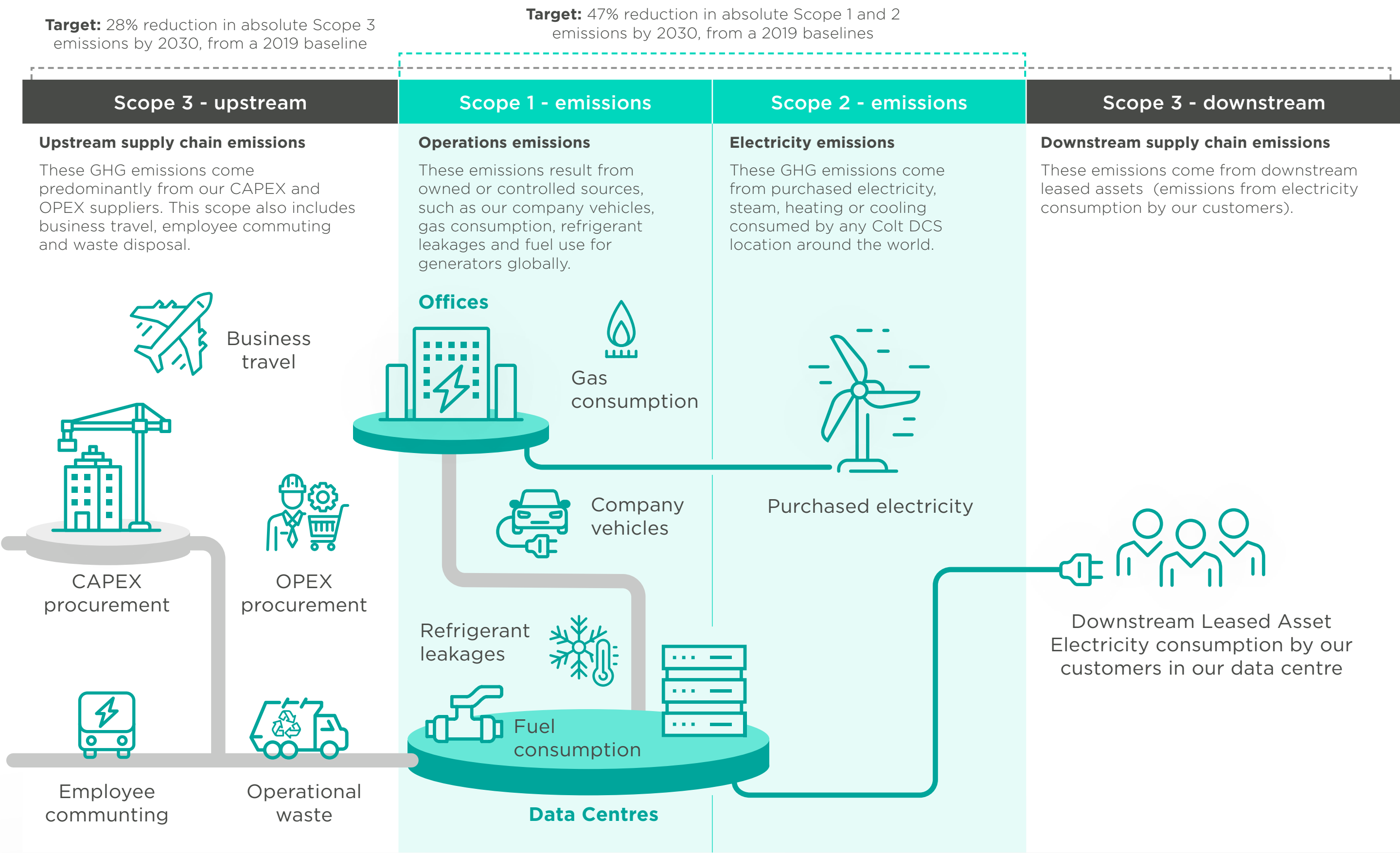


Greenhouse gas emissions

We continue to reduce our GHG footprint in line with our Science Based Targets initiative (SBTi) validated pathway and wider net zero ambition. In 2024, we achieved a 89% reduction in market based Scope 1 and 2 emissions against the 2019 baseline. Absolute Scope 3 emissions fell by 26% over the same period.

In 2024, our total GHG footprint (market-based) was 140,386 tCO₂e (compared to 207,594 tCO₂e in 2019, a 32% reduction). Through the adoption of a robust decarbonisation strategy that focuses on improving efficiency, investing in renewable electricity, and adopting sustainable procurement practices, we continue to decrease our GHG emissions across all scopes.

To support transparent and consistent reporting, we disclose GHG emissions across Scopes 1, 2, and 3 in line with the GHG Protocol Corporate Standard. In 2024, we conducted a recalculation of emissions from 2019 and 2023 to reflect the most accurate and up-to-date data available. This included the application of updated emissions factors for Scope 3 supplier emissions. More information on the methodology can be found in the Annex.



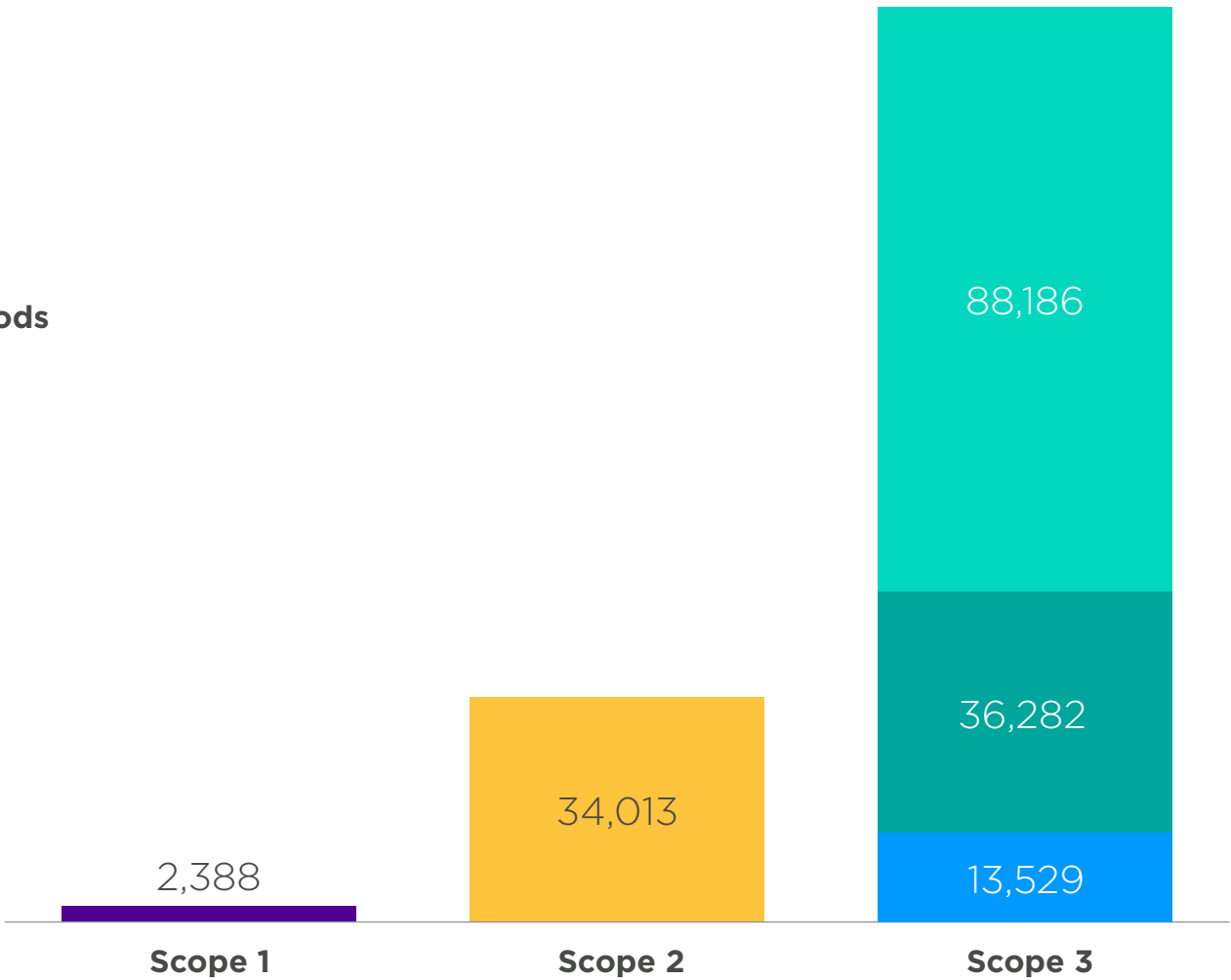
By 2030, reduce absolute Scope 1 and 2 emissions by 47% compared to the 2019 baseline.

Operational emission sources, which includes emissions from purchased electricity, refrigerant leakages, company vehicles and back-up generator fuel consumption, accounted for approximately 2% of our 2024 market-based carbon footprint. Overall, our Scope 1 and 2 emissions decreased by 89%, compared to the 2019 baseline. This year, we procured 100% renewable electricity globally, reducing Scope 2 (market-based) emissions to zero.

In 2024, Scope 1 emissions were 2,388 tCO₂e, a 30% increase compared to the previous year. This increase is driven by two new data centres, Mumbai in India and Osaka Keihanna in Japan. As part of the facility's initial setup, additional cooling infrastructure was deployed, resulting in increased refrigerant volumes across the estate. Refrigerant-related emissions are a known contributor to Scope 1 totals, particularly during installation and commissioning phases, when losses may occur.

Absolute GHG emissions in tCO₂e (location-based)

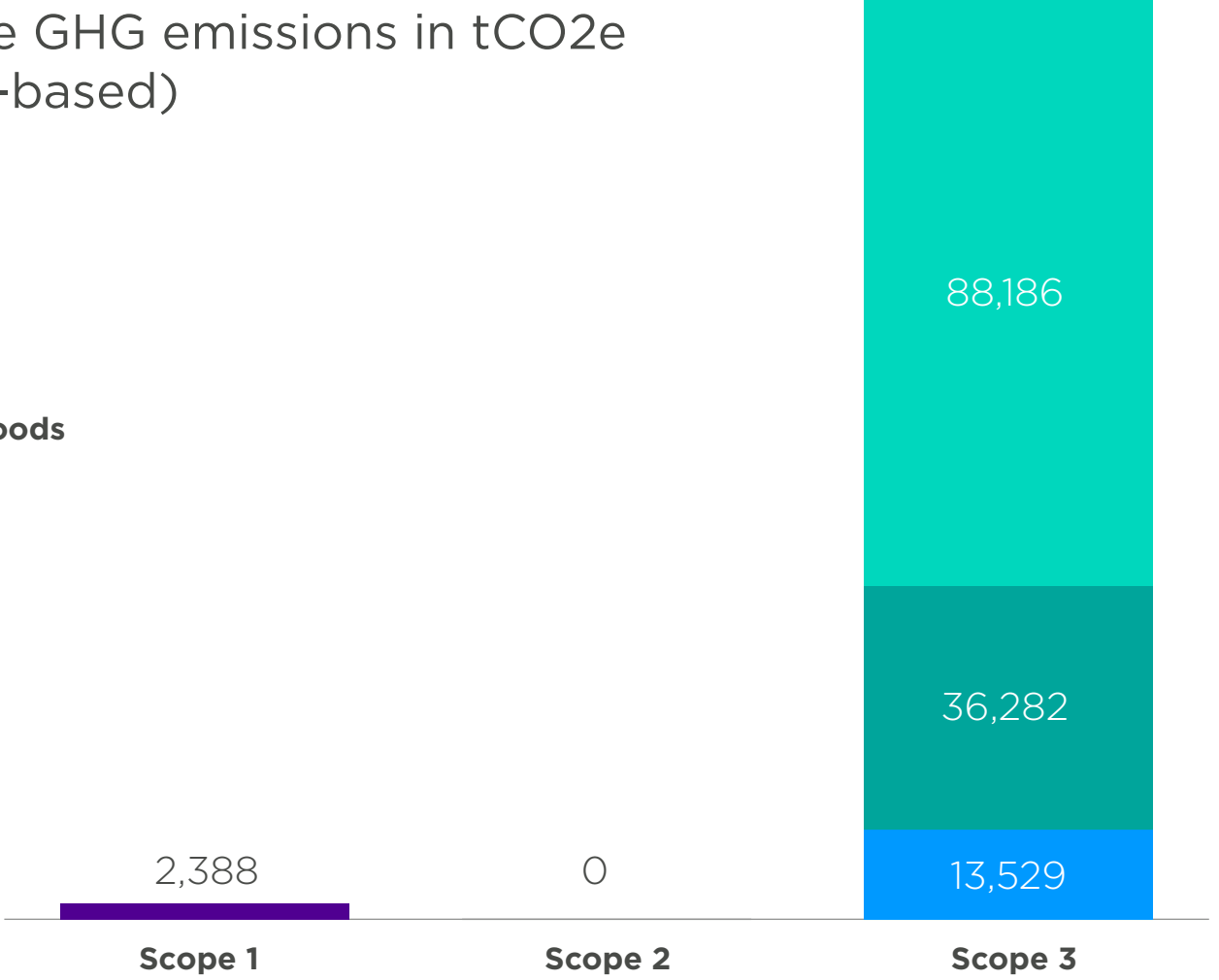
- Scope 1
- Scope 2
- Others*
- DLA
- Capital Goods



*Other includes PG&S, Fuel and Energy Related Activities (FERA), Operational waste, Business travel, and Employee commuting.

Absolute GHG emissions in tCO₂e (market-based)

- Scope 1
- Scope 2
- Others*
- DLA
- Capital Goods



*Other includes PG&S, Fuel and Energy Related Activities (FERA), Operational waste, Business travel, and Employee commuting.

By 2030, reduce absolute Scope 3 emissions by 28% compared to the 2019 baseline.

Scope 3 emissions represent the largest share of our total footprint, accounting for approximately 98% in 2024. While Scope 3 emissions reduced by 26% compared to the base year, there was an increase of 31% compared to 2023.

The key contributor to Scope 3 emissions is Capital Goods (category 2), accounting for 63.9% of Scope 3. This category reflects the embodied carbon associated with construction materials, mechanical and electrical equipment, and other long-lived assets used. Additionally, a spend-based methodology was used this year to calculate supplier emissions, whereas we had used supplier-specific data in the previous year.

Downstream Leased Assets (DLA - category 13) contribute 26.29% of Scope 3 emissions, linked to sub-metered electricity consumption of our customers. While we do not control the efficiency or energy sourcing of client IT equipment, we continue to promote and support decarbonisation across our customer base.

Net Zero by 2045

Our long-term climate goal is to achieve a 90% absolute reduction in Scope 1, 2, and 3 emissions by 2045, compared to our 2019 baseline. As of 2024, we have already reduced our market-based emissions by 32%. To meet our 2045 target, we are focused on key enablers: maintaining 100% renewable electricity across our operations, deploying scalable and sustainable data centres, and designing all new sites in accordance with the environmental sustainability criteria outlined in the GRD document to ensure operational efficiency from day one. We are also committed to minimising embodied carbon in new developments through low-carbon material choices and procurement practices, and by applying whole life cycle carbon assessments to all future data centres to guide more sustainable decision-making across design, construction, and operations.

Scope	Sources	Decarbonisation levers
Scope 1	These greenhouse gas (GHG) emissions result from owned or controlled sources, such as Colt DCS’s company vehicles, gas consumption, refrigerant leakages and fuel use for generators globally.	<ul style="list-style-type: none">Aligning new data centres with the environmental sustainability criteria outline in the Global Reference Design (GRD) document, such as low-GWP refrigerants and HVO-compatible back-up generatorsDetection systems to identify refrigerant leakagesExploring carbon offsets in 2025
Scope 2	These GHG emissions come from purchased electricity, steam, heating, or cooling consumed by any Colt DCS location around the world.	<ul style="list-style-type: none">Continue to procure renewable electricity certificates globallyExplore alternative supply strategiesEnergy efficiency initiatives
Scope 3	These GHG emissions come from the rest of the value chain and are made up mostly from supply chain emissions. This scope also includes business travel, employee commuting, downstream leased assets, and waste disposal.	<ul style="list-style-type: none">Measure embodied carbon emissions for new developmentsSupplier engagement programme, including selection criteria, Sustainability Schedule in contracts and annual questionnairesProvide cycle racks and EV charging pointsReducing business travel through internal carbon taxZero Waste to Landfill programmesEngage with hyperscale customers to ensure RE coverage

Energy management

Data centres are among the most energy-intensive building types. As a colocation provider, the majority of our energy consumption is driven by customer IT loads. Our role is to ensure that the supporting infrastructure such as cooling, power distribution, and building management systems is designed and operated as efficiently as possible to enable resilient and low-impact performance.

Our energy strategy is built around two focus areas across existing and new facilities:

- 1. **Transition to renewable sources of energy**
- 2. **Improve energy efficiency**

Our Paris South West site is certified with ISO 50001 (Energy Management System) and adheres to the EU Code of Conduct for Data Centre Energy Efficiency.

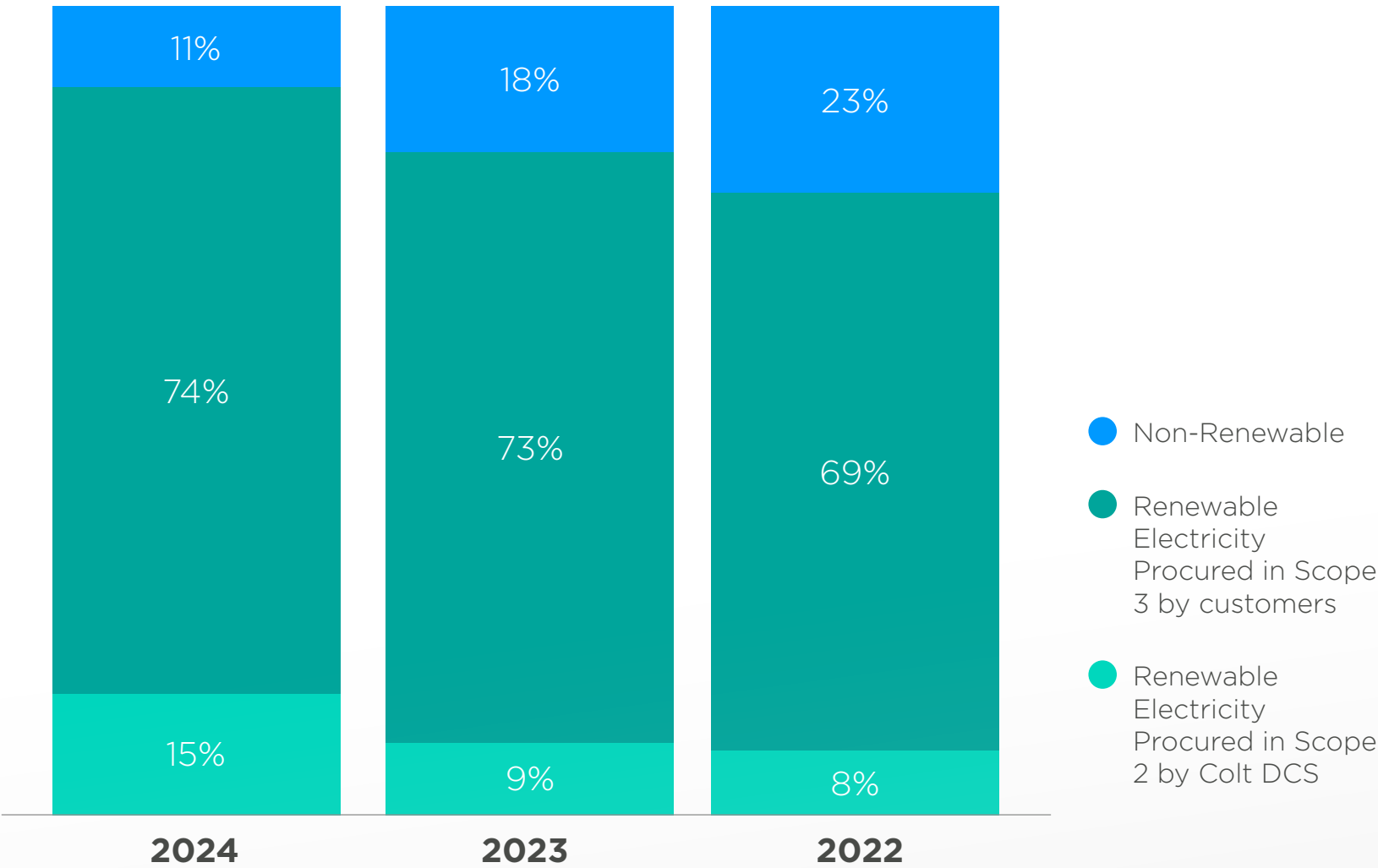
In addition, our Mumbai facility has achieved IGBC Pre-Certified Platinum status under the IGBC Data Centre Rating System, recognising its performance in sustainable building design and operations.

Transitioning to renewable energy

Colt DCS is committed to achieving 100% renewable electricity in Scope 2 across its global operations by 2030. We achieved this target six years ahead of the target year through the procurement of renewable electricity certificates. In 2024, we procured additional certificates for the Tokyo Shiohama site in Japan. Additionally, we will continue to work closely with our hyperscale customers to increase renewable electricity (RE) procurement for their consumption, covered in our Scope 3 emissions.

In 2024, Colt DCS's overall energy consumption increased due to the opening of two new sites: Osaka Keihanna, a 45 MW data centre in Japan, and Mumbai, a 120 MW data centre in India. Our reported energy scope includes electricity used to support servers and operate shared infrastructure (e.g. cooling and lighting in common areas), customer electricity consumption for IT equipment within our data halls—including customer procured renewable electricity—and diesel fuel used for emergency back-up generation. Across our global sites, 90% of our total energy consumption is renewable.

Renewable vs Non-Renewable as % of Total Energy Use





Improving energy efficiency

In 2024, Power Usage Effectiveness (PUE) is calculated as defined by ISO 30134-2:2016. It is the ratio of a data centre's total electricity use to the electricity consumed by customer IT equipment where,

- Total electricity covers everything needed to keep IT running safely: cooling plant, UPS and power-distribution losses, lighting, security and building-management systems.
- IT electricity is the metered power drawn by servers, storage and network hardware.

In 2024, Colt DCS achieved a global average PUE of 1.41. This means that for every 1 kWh used by IT equipment, an additional 0.41 kWh was required to operate the supporting infrastructure.

Data centres in India and Japan generally report higher PUE averages, primarily due to the increased cooling requirements necessary for the region's climatic conditions. We continue to improve PUE performance as site utilisation increases.

Additionally, we'll continue to improve energy efficiency across operations, through equipment upgrades, cooling optimisation and enhanced metering.

Case Study

London North and West

At our London West data centre, we replaced across multiple phases the Uninterruptable Power Supply (UPS) with a new system which is 96% efficient. The UPS replacement, completed towards the end of June 2024, will save over 140,000 kWh of electricity per year. At the London North site, both UPS systems in halls 1 and 2 have been replaced, improving efficiency from 72.5 to 93.75%. Additionally, lights in these halls, as well as the common areas, have been replaced with LEDs to reduce electricity consumption.

Osaka Keihanna

≤ 1.48
Targeted
annualised PUE

45.9
MW IT

42,000M²
Gross site area



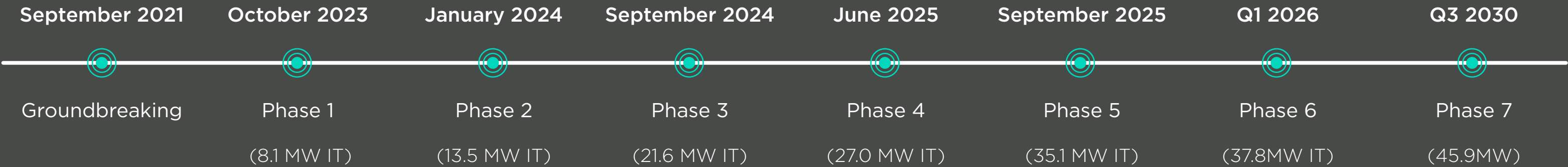
Osaka is Japan’s second-biggest data centre market, having benefited from major investment in local fibre and power infrastructure. According to leading real estate consulting companies, by 2029 Japan is forecasted to deliver up to 2.5GW of IT power for data centre capacity.

Based in Keihanna Science City and designed to a Colt tier 3 specification, once complete, this site will deliver 45.9 MW of IT power across a gross technical area of 42,000m2. Developed to support the digital transformation sweeping the city, our Colt Osaka Keihanna Data Centre is an impressive site for cloud and AI service providers looking for scalable capacity to support high performance computing (HPC) and increasing IT workloads.

Our Keihanna-based teams have been involved in several community initiatives, including the annual Keihanna Science Festival. Held in the same town as our data centre, the festival was a great opportunity to interact with the local community by hosting a booth and workshops. The theme of this year’s workshop was Creating, Using, and Learning about Electricity. Operations teams conducted six 45-minute interactive sessions with children of different ages.

Key features:

- TRUE Zero Waste to Landfill certified
- 100% renewable electricity
- ISO 27001 certified (Management of Information Security)
- SOC2 Type II accredited
- Base-isolation earthquake tolerant structure
- Water-free cooling system



Eliminating Waste and Protecting Natural Resources

Colt DCS is committed to minimising waste and promoting efficient use of resources throughout the data centre lifecycle. We have set an ambitious target to achieve zero waste to landfill, with a diversion rate of at least 90% across six data centre sites.

Waste elimination and diversion

Our approach to waste management is guided by the principles of the TRUE Zero Waste certification, which helps us reduce environmental impact and resource loss.

Our Global Zero Waste to Landfill Policy sets clear expectations for employees, contractors, and supply chain partners regarding waste management practices. We actively monitor the volume of waste generated, categorised by type and disposal route, across all operational sites. In 2024, 91% of waste generated across six sites was diverted from landfill*.

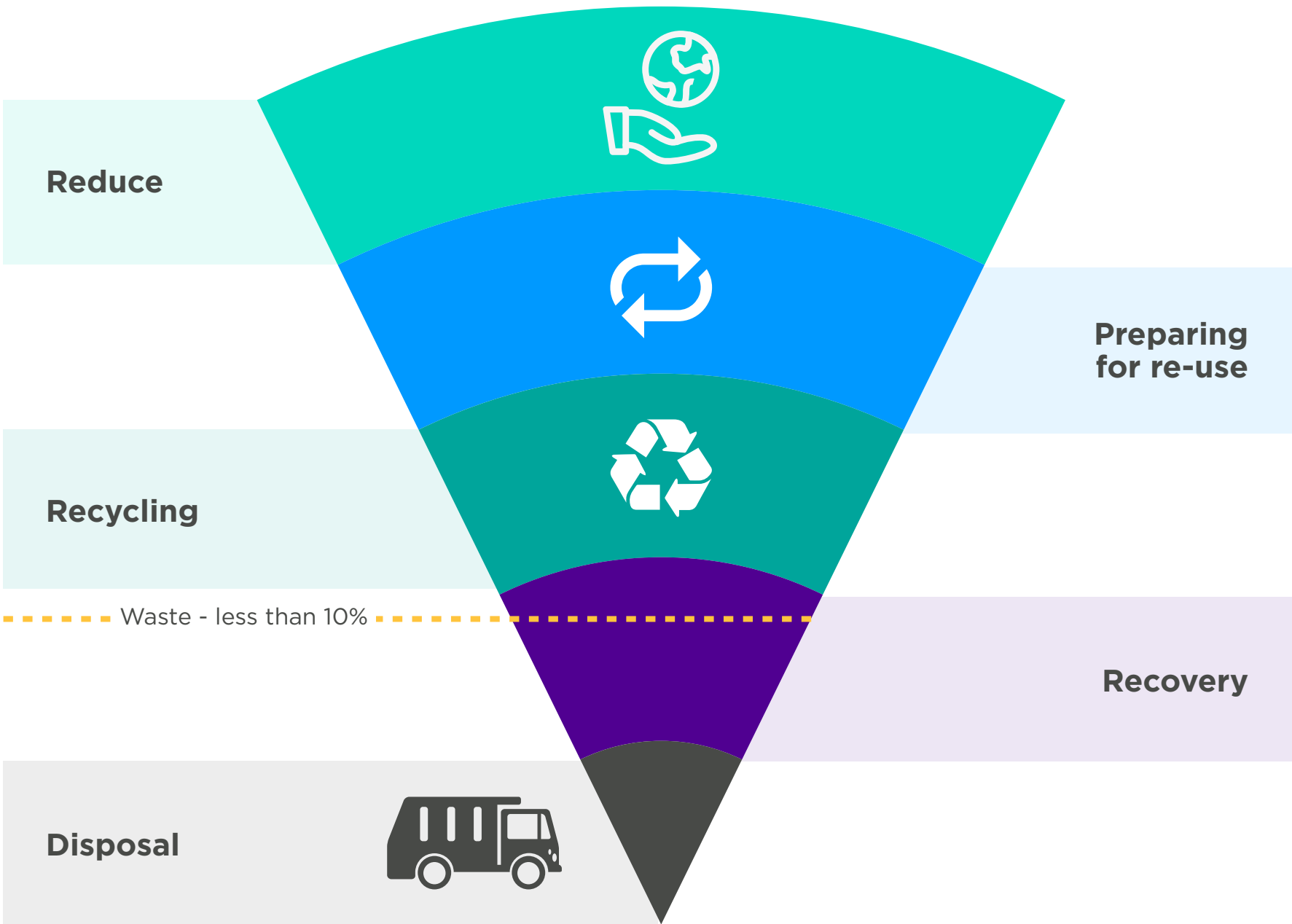
To support landfill diversion, we engage with certified waste treatment partners to prioritise reuse, recycling, and responsible disposal. Circular economy principles are also embedded in our design and construction processes. New data centres are developed for longevity, adaptability, and material recovery. Where we redevelop industrial sites, we assess opportunities to retain structural elements, recycle steel, crush concrete for reuse, and segregate hazardous materials for specialised handling. Construction waste is managed on-site with designated facilities for separating plastics, metal, cardboard, glass, food waste, and general waste streams. Additionally, where feasible, waste heat from data centre operations is captured and reused to improve overall environmental performance.

Water management

Colt DCS recognises the importance of responsible water stewardship in data centre operations. We monitor water consumption across our global offices and cooling systems, ensuring that all wastewater is assessed prior to discharge and meets applicable regulatory and environmental standards.

In line with our environmental design strategy, new data centres are equipped with air-cooled chillers to follow a zero-water approach where possible, reducing operational water demand. In addition, rainwater harvesting systems are incorporated into new builds to support non-potable water use and minimise water wastage. These design features help us reduce reliance on municipal water supply and improve the resilience of our operations in water-stressed regions.

* Frankfurt City, London North, London West, Rotterdam, Paris South West, Tokyo Inzai 1 – 3



Case Study

London North and Osaka Keihanna

In 2024, Colt DCS achieved 90% waste diversion from landfill at our London North and Osaka Keihanna sites. Both sites are in the process to apply for TRUE Zero Waste Certification, managed by Green Business Certification Inc. (GBCI). The program provides a structured approach to waste reduction, resource efficiency, and sustainable practices, aiming to minimize landfill waste and promote a circular economy. The certification process involves a point-based system with multiple levels, based on the Zero Waste International Alliance’s definition of zero waste.

Connecting People

We aspire to create a lasting positive impact on stakeholders across our entire value chain, from customers and suppliers to local communities and our people.

- 20 Raising the bar on customer excellence
- 22 Becoming an employer of choice
- 26 Responsible supply chain management
- 27 Supporting our local communities

Raising the bar on customer excellence

At Colt DCS, our vision is to be the most trusted and customer-centric operator in the industry. We are committed to building and maintaining strong, lasting relationships with our customers. With the scale to deliver and the agility to care, Colt DCS stands out by fostering long-term partnerships, driven by a dedicated team and a shared goal of becoming the supplier of choice.

Our Customer Experience Programme ensures every customer, regardless of size, has a touchpoint within the Colt DCS organisation. Our Service Management Team acts as a single point of contact for top-tier customers, working hand-in-hand with our Operational Teams to provide seamless support from site operations to billing and beyond. Regular, structured feedback sessions allow us to quickly identify challenges and implement continuous improvements.

In 2024, we enhanced our Customer self-service Portal by introducing an Internal Performance Control approach. This upgrade transformed the portal into a comprehensive hub for service requests and performance tracking. Customers can now log observations related to Health & Safety, Security, and Site Issues, all of which are tracked through to resolution. This transparent, data-driven approach has already led to measurable improvements in responsiveness and service quality.

“ I wanted to give praise and thanks to the Colt members who are closely working with our teams. They do not hesitate to show up and always help us when we needed it. The colt members provides solutions to our needs. ”

Global Technology Company

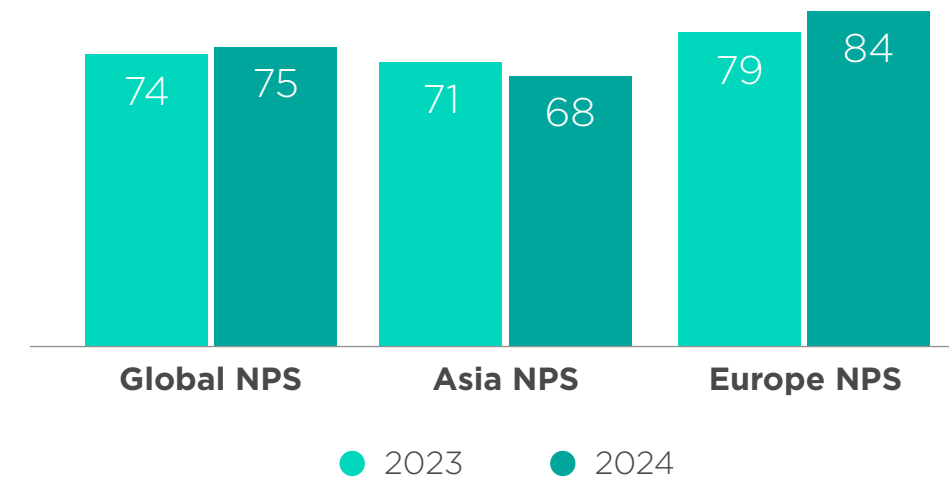


“I would definitely recommend Colt DCS as a vendor. You and the team in (location) are always very responsive, helpful & professional. Not all vendors are as easy to work with.”

Global Investment Bank

Net Promotor Score

Customer satisfaction is at the heart of our operations, and we measure it through our annual Net Promoter Score (NPS) survey. In 2024, Colt DCS achieved its highest-ever NPS of 75, reflecting year-on-year growth and strong customer advocacy. With 13% of customers across Europe, Japan, and India participating, the feedback provided valuable insights. We've since taken proactive steps to follow up directly with respondents, turning their suggestions into action. These open, constructive conversations are a testament to the trust and transparency we've built with our customers.



Spotlight

In March 2024, Colt DCS launched the Central Telemetry Platform (CTP). The globally available solution developed in partnership with Protiviti, a global consulting firm and Microsoft Solutions Partner, enables customers to use real-time telemetry data to support the management of their platforms in Colt DCS' data centres around the world. Key features of the CTP include:

- Access to thousands of data points - from data centres Colt DCS operates for our customers around the globe, delivered to customers in a standardised format.
- Near real-time data - enabling customers to make accurate and timely decisions on their processing loads across multiple data centres by monitoring power usage, internal and external temperatures, PUE and alarm status.
- Data sent via API - with data sent every minute, customers can integrate the platform's API seamlessly into their existing systems, applications, or dashboards to build powerful tools and automate processes based on the most current data available.
- Simplified reporting dashboard - the platform includes visually engaging dashboards that transform complex telemetry data into intuitive graphs and charts to allow users to spot trends, identify anomalies, and check for and provide evidence for SLA compliance.



Becoming an employer of choice

As we continue to grow, fostering an environment where employees feel valued, engaged, and inspired is essential. Together with the Code of Conduct and global policies, our TRUST values form the foundation for how we serve customers and build relationships.

These five Company Values guide everything we do, ensuring we work towards our shared vision to become the most trusted and customer-centric data centre operator in the industry.

- T Trust:** We prioritise building trust with employees, customers and partners. We strive to exceed expectations and will not compromise on our commitments.
- R Respect:** We believe respect is the foundation of our business relationships. We embrace the benefits of a truly diverse and inclusive culture.
- U Unite:** We work as One DCS to achieve our goals. Together, we deliver with unwavering passion.
- S Sustain:** We maintain strong partnerships that support our business growth and Customer focus, whilst minimising our impact on the Environment and Society, creating true value for all.
- T Trailblaze:** We foster an open mindset, working efficiently and pro-actively to achieve remarkable results.

In 2024, we launched the DCS’s first ever Employee Value Proposition (EVP). What is an EVP? It’s a deal which an employer makes with talent, and it’s entirely human - a human deal on how we make people feel, whether they are prospective candidates or current members of the DCS family. It answers why one should join and how the company will inspire long-term loyalty.

At DCS, everyone is a key player in our future success and is part of, and contribute to a vibrant, diverse, and ever-changing environment, full of opportunities and achievements.

DCS is a very agile company built on a true sense of family and community of people that work for each other.

Our Employee Value Proposition is centred on making a purposeful human deal, and our innovative employee framework, AIM, will support and guide our team members at every milestone of their careers. The three pillars of AIM (Activate careers, Integrate into the culture, and Motivate performance) are underpinned by several existing and new activities and initiatives launched in 2024.

For more information on the AIM framework, see the [2023 Colt DCS Sustainability Highlights Report](#), page 18.

Spotlight

Colt DCS was proud to be shortlisted for the ‘**Data Center Workforce Initiative of the Year**’ at this year’s DatacenterDynamics (DCD) Awards—a recognition of initiatives that drive meaningful change and help bridge the workforce gap in the industry. This nomination reflects our commitment to fostering a sustainable, people-focused workplace that supports both individual career growth and the long-term success of our business.

At the heart of our submission was AIM (Activate, Integrate, Motivate), our Talent Framework, launched in September 2023. AIM provides employees with clear career pathways, reinforcing our dedication to a strong Employee Value Proposition (EVP) and positioning Colt DCS as an Employer of Choice.

People Matters survey

At Colt DCS, fostering a workplace culture where employees feel valued, heard, and empowered is a core part of the company's sustainability strategy. Sustainability at Colt DCS extends beyond environmental initiatives—it encompasses creating an inclusive, future-ready organisation where both people and business can thrive.

A key initiative supporting this commitment is the People Matters survey, which provides valuable insights into employee sentiment and helps shape an evolving workplace culture. In the most recent survey, 84% of employees participated, demonstrating a high level of engagement and a collective commitment to continuous improvement.

The results highlight significant progress in several key areas:

- **87% of employees would recommend Colt DCS as a great place to work—a 4% increase from the previous year and ahead of similar companies in the industry.**
- **85% of employees expressed confidence in the company's future, a 5% increase from the previous year - reinforcing a strong sense of stability and direction, with results exceeding those of similar companies in the industry.**
- **92% believe that Colt DCS supports diversity in the workplace, a 3% increase from 2023 and surpassing industry comparisons.**

These findings reflect Colt DCS's commitment to fostering an inclusive and engaging workplace, where employees are supported in their careers and aligned with the company's strategic vision. By continuously listening to employee feedback and acting on key insights, Colt DCS remains dedicated to building a thriving, high performing organisation.

Upskilling our workforce

In November 2024, we partnered with a leading skills-based learning provider to support continuous learning and professional development at Colt DCS. MyLearningHub empowers our people to understand, measure and build their key skills, both now and for the future. This innovative platform provides personalised learning at scale, through AI-powered content recommendations and skills intelligence data. Employees have access to a wide variety of on-demand learning content to suit their needs, such as LinkedIn Learning courses, articles, TED Talk videos and more.

For 2025, our focus is to further embed MyLearningHub across Colt DCS. Our Talent Development Specialist and group of dedicated Learning Champions represent learning on behalf of their functions and will continue to curate relevant and engaging learning content to support ongoing skill development.

Future-ready leadership

Following the successful launch of the Management Matters programme in 2023, Colt DCS has developed an online toolkit for people managers to support their ongoing learning after attending the in-person training. The toolkit contains a wealth of blended learning resources such as material from the training, along with relevant video content and articles to help bring the key concepts to life and assist our people managers to apply their learning within their teams and drive a high performance culture.

Brain Boosters

Brain Boosters launched in October 2024, it is an exciting new initiative designed to foster continuous learning and professional development among DCS employees. This programme is unique because it is entirely employee-led, with presentations and sessions delivered by our employees themselves. The topics covered in these sessions are driven by what employees want to learn about, as indicated through feedback forms. The primary goals of the Brain Booster sessions are to expand knowledge, boost practical skills, and provide opportunities for employees to connect with their colleagues in a relaxed and informal setting. By focusing on topics that are relevant and engaging, the programme aims to make learning a more dynamic and enjoyable experience.

Case Study

Launched in 2023, MentorU is a six month programme designed to match new employees with mentors, fostering valuable mentorship relationships. This initiative provides mentees with the opportunity to gain knowledge, skills, and insights from their mentors, which helps enhance their professional abilities. Mentors play a crucial role in guiding mentees through their career paths, assisting them in setting goals, and offering support in navigating various career challenges and decisions. MentorU has seen a significant success, with more than 20% of our workforce being enrolled by before December 2024 . Looking ahead, the programme continues to grow with additional new mentoring relationships formed every day. This ongoing initiative shows our commitment to professional development and support within the organisation.

Continuous Performance Management tool

As part of our commitment to fostering a culture of continuous development and growth, we have implemented Continuous Performance Management tool to provide employees with a more dynamic and sustainable approach to performance management and feedback. Our new Continuous Performance Management (CPM) and Feedback system fosters real-time goal setting, regular check-ins, and activity tracking, ensuring employees can adapt to evolving business priorities while maintaining a clear path for development. By enabling instant feedback from peers, managers, and stakeholders, we are strengthening collaboration, innovation, and personal growth. By embedding continuous development and open communication into our culture, we are building a resilient workforce that is empowered to grow, contribute, and drive high performing Colt DCS.

30,60,100 day calls

Data is gathered through TA check-in calls with new joiners, providing insights into the employee experience at different stages. The 30-day check-in focuses on the initial onboarding experience, role clarity, and early challenges, while the 60-day check-in assesses engagement, training effectiveness, and cultural integration. By the 100-day check-in, the focus shifts to long-term fit, retention drivers, and overall satisfaction. Findings highlight key trends in onboarding effectiveness, common concerns, and recommendations to enhance employee experience and retention.



Work experience placement

Colt DCS welcomed its first-ever work experience student in 2024, marking an exciting milestone in our commitment to developing future talent. As a growing business, we recognise the value of providing hands-on learning opportunities and are proud to open our doors to students seeking real-world industry experience. This is a new initiative for us, and we are keen to explore further work experience placements, reinforcing our dedication to supporting early careers and inspiring the next generation of talent.

Diversity, equity and inclusion

We remain committed to fostering an inclusive workplace. Our strategy for 2025 and beyond builds on the strong foundation established in 2024. Our initiatives have centred around our people, with passionate volunteers delivering meaningful activities for key events that truly matter to our people, focussing on inclusive and transparent moments where colleagues can celebrate, learn and connect.

From the introduction of our first Culture Week to African Drumming Workshops and open conversations on taboo subjects, we are dedicated to celebrating everyone at DCS and creating a culture of belonging and acceptance.

Additionally, our drumbeat initiatives have created further inclusive practices, including MentorU and Brain Boosters, providing a platform for our subject matter experts, collaboration across business functions, and peer-to-peer learning.

We aim to cultivate a supportive environment where all employees feel valued and empowered. Feedback from colleagues shows a strong belief that Colt DCS promotes a diverse workplace where inclusion, equity, respect, and acceptance are deeply valued.

To enable us to attract the best talent, we have implemented inclusive recruitment training for all employees, emphasising fair and consistent hiring practices, supporting our launch of panel interviews in 2023.

A key aspect of this strategy is the adoption of formal panel interviews with a diverse group of three interviewers. This approach ensures each candidate receives a thorough assessment, drawing on varied perspectives to minimise bias. By standardising our interview process, we promote transparency and fairness, strengthening the integrity of our hiring procedures and fostering a culture of inclusivity and equal opportunity that reflects our core values.

Collective bargaining

We are committed to creating an environment that promotes fair treatment and a healthy work-life balance. Where required by legislation, collective bargaining agreements are in place which outline working conditions and terms of employment, and provide elected employee representation in accordance with national laws. For employees not covered by these agreements, working conditions and terms of employment are specified in their employment contracts, as well as in our global and local HR policies and the employee handbook. Looking ahead, Colt DCS is in the process to renew its policies as part of the separation from the Group.

We have an active dialogue with our employees’ National Works Councils (NWC). In countries where there is no National Works Council, we have other forms of information and consultation forums, including elected employee representatives and Colt DCS Ambassadors.

Recognising talent

Our recognition platform, Inspire, continues to be an important tool to celebrate employees’ efforts and behaviours. We saw a record number of eCards and TRUST Ambassador awards sent across the business in 2024.

We re-launched our quarterly TRUST GURU awards where up to 15 employees per quarter across the business are selected by our Senior Leadership Team for displaying the behaviours from one of our TRUSTvalues. All winners receive a monetary prize.

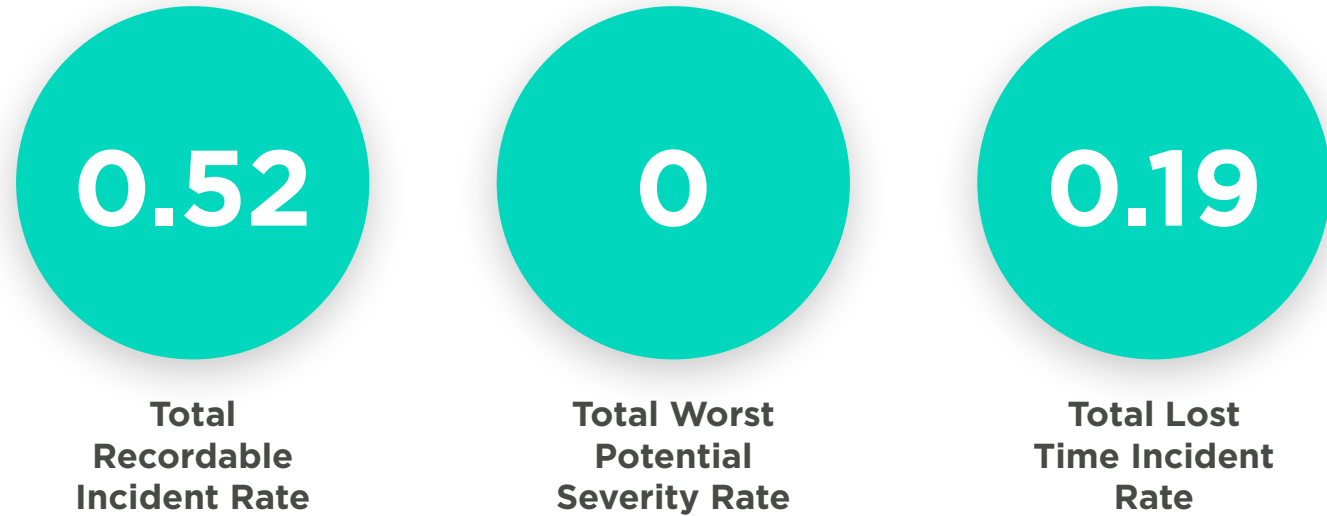
We were thrilled to see a remarkable 194% increase in nominations for our annual TRUST Hero Awards, our recognition programme that celebrates colleagues who truly embody the behaviours aligned with our TRUST values. The Senior Leadership Team undertook a careful and rigorous review of all submissions to select this year’s winners. As a testament to the exceptional calibre of nominations, they chose to honour six outstanding individuals - an increase from five winners in 2023. These outcomes reflect the extraordinary commitment, innovation, and passion demonstrated by our people throughout 2024.



Health and Safety

We are committed to designing and implementing a comprehensive health and safety management system that identifies legal compliance requirements and risks and delivers mitigation measures in a consistent, effective and transparent manner following the principles of ISO 45001. Our Global Health and Safety Policy sets out our health and safety commitments to effectively manage and safeguard the health and safety of our employees, contractors and any others who may be affected by our activities.

In 2024, our EHS and Technologies teams have been working closely together to develop a new system for notification and reporting of health, safety and environment (HSE) incidents using our Cherwell Service Management (CSM) portal, which was introduced in 2020 to manage and create incidents tickets and service requests. Training was provided by regional HSE managers and an e-Learning module was released via our learning platform.



Data (as per December 2024) covers all data centres that are operational and in development

The utmost priority for Colt DCS in the development of new data centres across the globe is the health & safety of our employees, partners, and all individuals engaged. In April 2024, for example, we achieved 150,000 safe working hours at our Colt Tokyo Inzai Four data centre during the first phase of construction. Being developed in Chiba New Town, on completion this state-of-the art hyperscale data centre will deliver 19.8MW of IT power and will be ready to support high-performance computing (HPC) and AI workloads. Key examples of safety control measures and protocols we implement to reduce risk during development are:

- Implementing Method Statements (MS) in High Risk Activity (HRA) meetings
- Ensuring that Protective Personal Equipment (PPE) is available and used
- Creating and communicating safety rules & guidelines
- Conducting safety training sessions
- Fulfilling equipment inspection and maintenance protocols
- Introducing inter-work coordination and safety awareness sessions
- Conducting daily on-site patrols to identify safety risks with countermeasures in place
- Ensuring safety pathways for all workers and vehicles
- Adopting worker-oriented site management through activities of the Foreman's Association

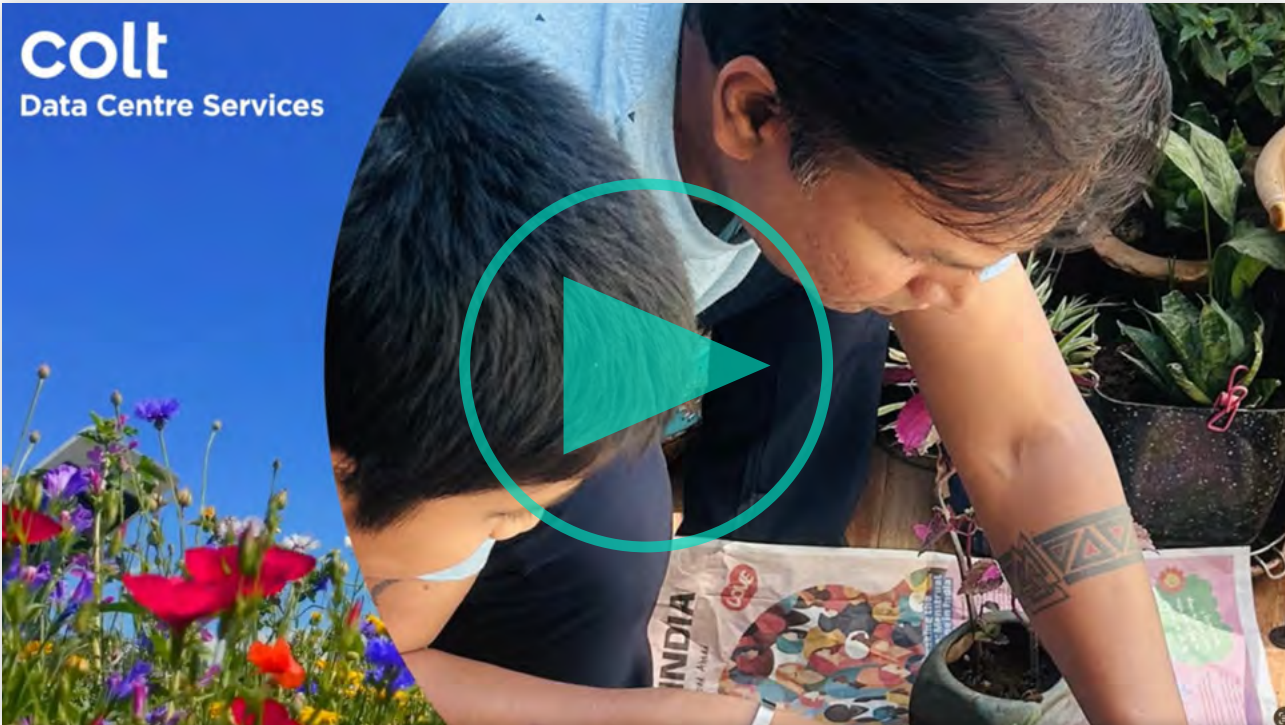
Case Study

Colt DCS launched a High-Risk Activity, Health and Safety training module in March 2024, mandatory for all employees in our operations and development teams. The e-learning explains the principles of risk management and how to control high risk activities in the workplace. To support this activity, new posters were sent to all data centres, promoting compliance, the importance of health and safety in our locations, and taking ownership.

Employee wellbeing

As part of our ongoing commitment to employee mental health and wellbeing, we have introduced Wellbeing Days, dedicated time off for our employees to rest, recharge, and focus on their mental and physical health. This initiative aligns with our broader sustainability and people-first strategy, ensuring that our employees have the support they need to

maintain a balanced and fulfilling work life. By encouraging self-care and providing flexibility, we aim to foster a positive workplace culture that prioritises both productivity and personal wellbeing.



Case Study

MYNDUP

To strengthen our wellbeing offering, and to continue creating a working environment where employees feel valued, supported, and empowered to achieve their best, professionally and personally, we launched a partnership with MYNDUP.

MYNDUP is a wellbeing and coaching service that offers virtual 1:1 sessions with qualified practitioners and has a library of helpful resources, from career coaching to meditation. This is a service we have chosen to help our colleagues on their journeys of self-development and be proactive in getting the coaching and tools they need to improve within the areas that matter to them and their families and friends.

Responsible supply chain management

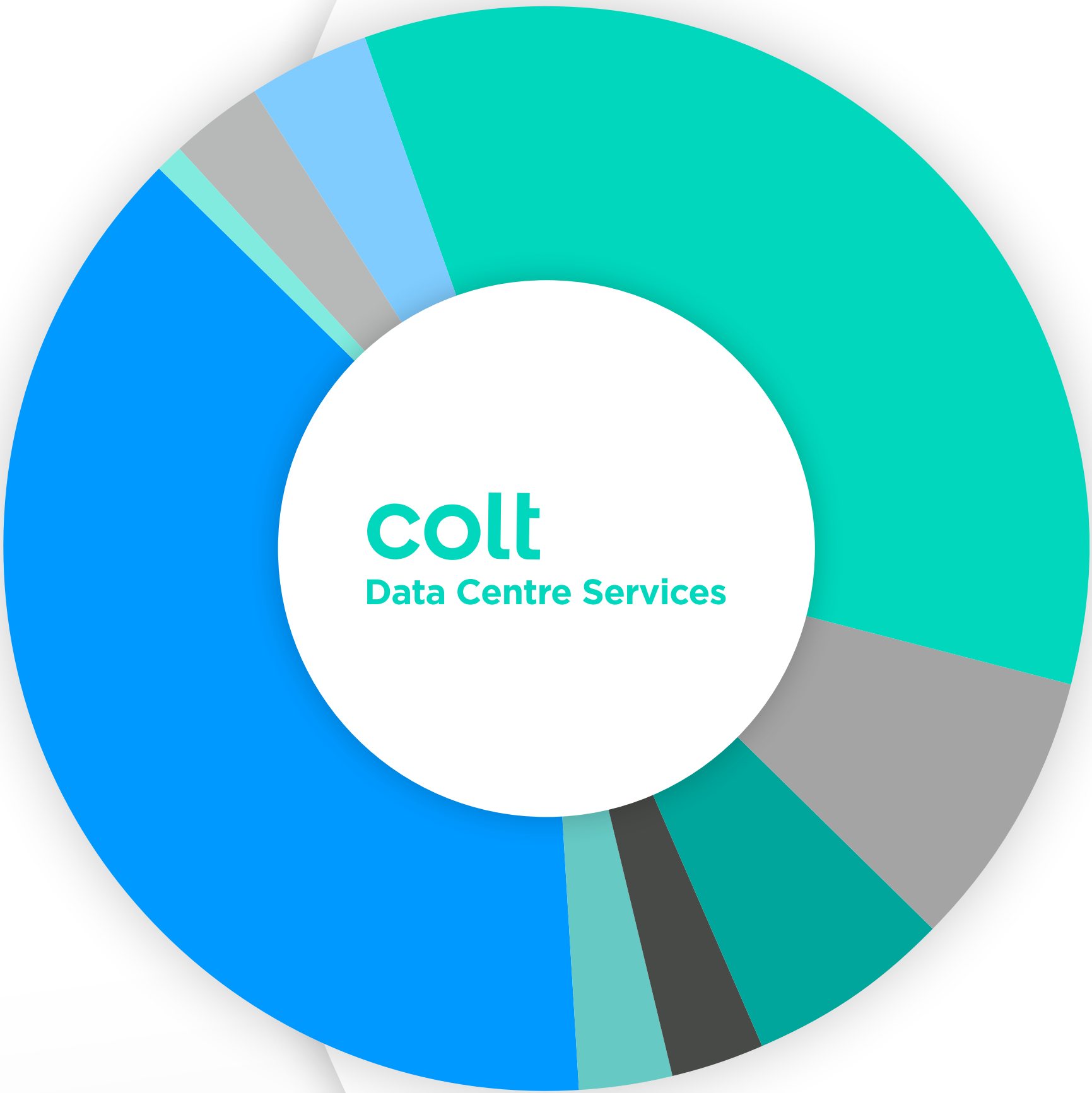
We are committed to engage with our suppliers and to ensure transparency by mapping our value chain and monitoring compliance with labour and environmental standards. Achieving our 2045 net-zero target, will require us to closely collaborate with our suppliers and industry peers to reduce our Scope 3 emissions.

In 2024, 62% of our global emissions are associated with our supply chain. To reduce our Scope 3 emissions, we have set a target to engage with 93% of our suppliers by emissions to ensure they set a science-based climate target. In 2024, 91% of suppliers by emissions have science-based targets in place. We continuously revise and improve our supply chain decarbonisation roadmap to stay aligned with the latest developments.

We are committed to the highest possible standard of corporate governance and responsibility, including when working with suppliers. These expectations are set forth in our Supplier Code of Conduct, which incorporates the same standards of ethical conduct and integrity as our Code of Business Conduct.

Guided by the Colt Group Sustainable Procurement Policy, we consider sustainability criteria in the selection, management and evaluation of our suppliers. We use Request for Proposal (RFP) scoring to evaluate supplier ESG performance and use a Vendor Risk Management (VRM) that covers a wide range of ESG issues including environment, health and safety, anti-bribery and corruption, data protection, cyber security, human rights and modern slavery protection. In the case that estimated new supplier spend is greater than €50k, suppliers are subject to the full VRM Standard as a condition for approval. Existing suppliers are assessed when their contracts are due for renewal and ESG performance is always included in our Quarterly Business Reviews with suppliers.

- Building Maintenance & Construction
- Maintenance
- IT
- Marketing
- Security
- Services
- Third Party DC Space
- Utilities & Energy
- Other



Supporting our local communities

Our employee-led initiatives were focused on creating partnerships and strengthening relationships while empowering local communities. All initiatives are selected based on the needs and requirements of the communities involved, and are managed in close collaboration with our partners to ensure effective impact.



LONDON HAYES, UK

Community Art Project

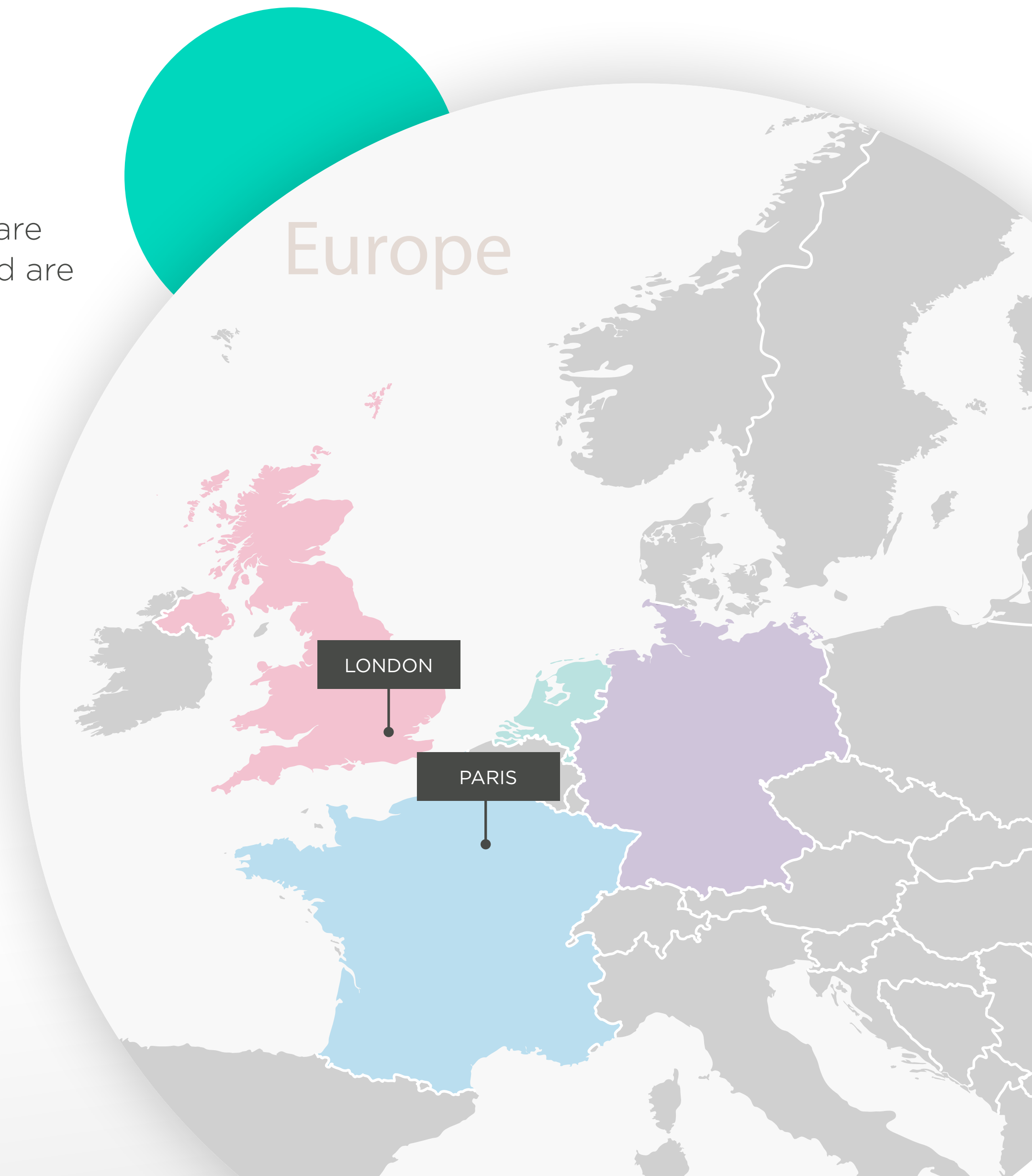
Students of the the Guru Nanak Sikh Academy Limited (GNSA) were invited to design a public artwork for the our new London Hayes Data Centre's facade, enhancing the Hayes skyline. The project challenged students to produce artwork relating to pixelation, digital connection, or technology. Following several workshops a steering group from Colt DCS, London Borough of Hillingdon, GNSA, CASC, and James Lambert, shortlisted student teams from 11 submissions. Each team presented for five minutes, followed by Q&A and reflections. The steering group then shortlisted three finalists, who will now refine their artwork for final presentation to the London Borough of Hillingdon.



PARIS, FRANCE

Sponsoring local initiatives

Our team in Les Ulis has committed to sponsor the local sports club - Club Omnisport des Ulis, and a local music association - Evil Musical Ulissien. This support will allow Les Ulis residents to benefit from sports and music education for their children at a discounted rate. The team is also planning to sponsor sporting and musical events with the associations. Lastly, the team signed an agreement to sponsor a digital platform for homework support. This free online application provides access for pupils to certified teachers, interactive educational resources, and personalised support from education professionals.





TOKYO, JAPAN

FIT for Charity Run

The financial industry in Tokyo (FIT) For Charity is continuing its efforts to make a difference in its communities by raising money through sponsors and running events. This year's event took place on Monday 16th September at the Japan National Stadium. Events included a 5k run, a 2.5k run, a walk, an Inter-company relay, and a kids run. This is the second year our Colt DCS team in Japan has taken part in and sponsored the event. This year we fielding 27 runners (including six kids) and 14 people also volunteered to help the organisers. We were one of 58 sponsors, and over 4,000 people took part. FIT is committed to making a difference through its support for under-recognised needs and causes.



INZAI AND SHIOHAMA, JAPAN

Good for our community and the environment

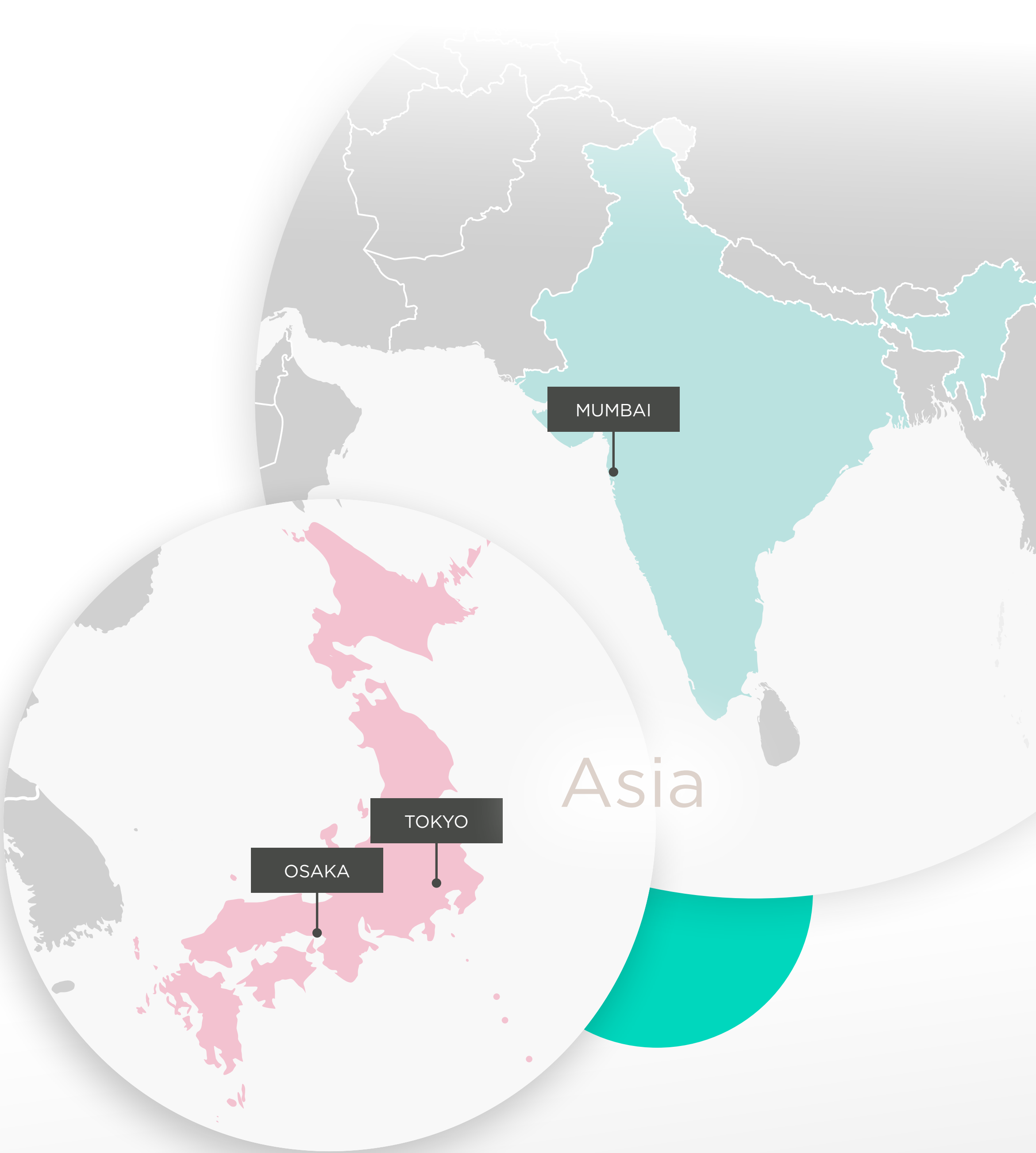
Our teams in Japan organise monthly and bi-monthly clean-up activities near our Inzai Campus and Shiohama data centres. These initiatives do not only contribute to long-term sustainability but also societal wellbeing. Seeing the teams in action is great, making a difference to the environment and our local communities.



MUMBAI, INDIA

Local beach clean-up

Our team in Mumbai partnered with the Child Help Foundation to undergo a litter-picking operation at Juhu Beach, in Mumbai, Maharashtra. Juhu Beach is the longest beach in Mumbai with thousands of tourists and locals visiting daily. With the substantial number of visitors, there is an increased amount of litter and plastic abandoned on the beach. The team was instrumental in cleaning up as much plastic and waste as possible, making waves toward a cleaner and clearer coastline.



Safeguarding our company

We work to ensure that we run our business responsibly and to the highest ethical standards.

- 30 Responsible business conduct
- 31 Security
- 32 Risk management





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. The DCS Board has reviewed and approved the ESG strategy when it was launched in 2023. 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 will oversee the strategic direction and execution of the ESG strategy. The Committee is 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 teams.

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 regular 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 breaches or suspected breaches of the Code.

Security

Our global data centre estate is certified to ISO 27001:2022 and SOC 2 Type II. Other specific data centres also maintain PCI-DSS compliance at the request of our customers. These certifications provide our customers independent assurance that our internal control processes regarding data centre security are designed and operated effectively.

Physical security

Our Security & Resilience team are responsible for ensuring that our employees, customers, suppliers and any other onsite visitors can work in a secure environment and that the confidentiality, integrity and availability of physical data centre infrastructure remain protected.

This encompasses operational compliance with DCS security policies and ensures that the appropriate standards, 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 standards are maintained.

The control of access to our sites and facilities is achieved through a combination of physical controls and Automatic Access Control Systems (AACS) which are central to our access control strategy. These controls allow our team to effectively manage individual access rights, as well as the physical control measures to entitle access.

Furthermore, our Security & Resilience team are responsible for the governance of the local management of security, ensuring that the central policy is reflected in local procedures and instructions and that those instructions are being adhered to.

Cyber security

Colt DCS places great importance on the protection of services provided to our customers and has implemented and maintain an effective DCS Information Security Management System (ISMS), certified to ISO 27001:2022.

The Global Technology & Security (GTS) function are responsible for identifying, implementing, and operating DCS security safeguards. Oversight of control effectiveness is exercised through an ongoing security program that incorporates, internal and external audit, maturity assessments and overseen by our Information Security Committee Committee and Senior and Executive Leadership.

In addition, we have partnered with industry-leading cyber security suppliers to enhance and augment our in-house capabilities. With staff employed 24/7, 365 days a year, we have the right teams in place to detect manage information and cyber security incidents.

Training and awareness

All Colt DCS employees are required to complete the Essentials Security Awareness training. By completing the training, employees are empowered with the knowledge to spot potential threats and take the right actions to keep our business secure.



Risk management

DCS applies an Enterprise Risk Management (ERM) Framework to evaluate risks to our business. Environmental and social considerations are included in this process. ISO 31000 standards guide our risk management approach, following a process that includes establishing context, identifying risks, assessing risks, implementing appropriate measures and ongoing monitoring.

The ERM framework identifies and assesses sustainability risk using the Colt Group's Climate Change Risk Register, operational site risk registers, and the Energy & Sustainability risk register. Additionally, under certain circumstances, project risk registers may include some ESG-related risks.

The risk management process is owned by the DCS Governance Committee and supported by the DCS Risk Function. The Risk Function works with all areas of the business to assist in identifying areas of risk, including emerging areas of risk, and ensuring that these risks are managed in line with expectations. The Risk Function co-ordinates the reporting of operational and strategic risks to the ELT, DCS Governance Committee and the Audit Committee to provide assurance that we are appropriately managing risk.

As outlined in the Risk Management Policy, there are four key stages in our risk management process.

1. Identify risks: The strategic context of the area needs to be understood in order to begin defining the risks and identifying the key priorities.

2. Assess risks: Once risks are identified, risks need to be assessed. Assessing risks allows us to understand the materiality of the risks identified, set and agree risk tolerance mechanisms, prioritise mitigating actions and enable risks from across the business to be compared on a broadly equal basis. A risk event is assessed in terms of potential impact on the business, likelihood of occurrence and proximity.

3. Risk response: The purpose of selecting a risk treatment option is to choose and implement strategies that are effective in managing and reducing identified risks.

4. Monitoring the existing control environment and delivering risk mitigation strategy: Controls are the mechanisms and processes in place to manage risks. Some controls are designed to reduce the likelihood of an event occurring, others are corrective controls and will reduce the impact once an event has occurred.

Climate risks

At Group level, we updated the climate risk register and conducted quantitative climate scenario analysis. We also used publicly available data from Network for Greening the Financial System (NGFS). Our latest quantitative scenario analysis focused on temperature rise, flooding, and carbon pricing. In 2024, we continued reporting according to the mandatory Climate-related Financial Disclosures as part of the Colt Group annual report and consolidated financial statements.

EHS risks

As part of our commitment to health, safety and wellbeing, Colt DCS have completed risk assessments for regular work activities, including visiting operations and construction sites, travelling for work purposes and office working, and working from home.





Annex – Data tables

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

	2024	2023	2022	2019 base year
Scope 1	2,388	1,840	1,318	3,143
Scope 2 (location-based)	34,013	30,163	30,372	59,225
Scope 2 (market-based)	0	5,065	8,891	17,970
Total Scope 1 & 2 (market-based)	2,388	6,905	10,209	21,113
Total Scope 1 & 2 (location-based)	36,401	32,003	31,690	62,368
Scope 3 categories				
Purchased Goods & Services	4,110	36,988	15,537	16,432
Capital Goods	88,186	22,691	8,150	66,529
FERA	8,602	7,154	7,428	14,179
Waste & Water	78	91	88	162
Business Travel	524	139	169	302
Employee Commuting	216	430	466	313
Downstream Leased Asset	36,282	37,669	42,611	88,565
Total Scope 3	137,997	105,162	74,448	186,481
Total Scope 1, 2, 3 (market-based)	140,386	112,067	84,657	207,594
Total Scope 1, 2, 3 (location-based)	174,398	137,165	106,139	248,849

Energy consumption in MWh

	2024	2023	2022
Total energy consumption (Mwh)**	774,046.7	662,784.4	594,085.3
Total electricity consumption (Scope 2)	118,163.3	89,916.2	93,190.5
% of electricity from renewable sources (Scope 2)	100%	63%	52%
Total electricity consumption (Scope 3)	652,719.1	568,253.9	497,528.7
% of electricity from renewable sources (Scope 3)	88%	85%	82%

** Our operational energy use calculations include sources: DCS total non-IT electricity for the site, customer electricity for their IT Equipment in our data halls, and diesel & fuel for emergency backup generation at all facilities.

Waste generation and treatment in kg*

	2024
Total	628,164
WTE	54,113
Reused	64,545
Reduced	3,230
Recycled	502,752
Landfill	344
Compost off-site	590
Anaerobically digested	2,590

*includes Frankfurt City, London North, London West, Rotterdam, Paris South West, Tokyo Inzai 1 - 3

Net Promotor Score

	2024	2023	2022
Global NPS	75	74	72
Europe NPS	84	79	76
Asia NPS	68	71	69

Environmental, Health and Safety

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



Annex – Greenhouse gas emissions methodology

We quantify and report our organisational GHG emissions in alignment with the World Resources Institute's (WRI) Greenhouse Gas Protocol Corporate Accounting and Reporting Standards and its supporting standards:

- **Scope 1 emissions** – WRI/WBCSD: Greenhouse Gas 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 DCS has operational control. This means having full authority to introduce and implement operating policies. In 2024, we updated the periodicity to calculate GHG emissions by establishing a half-year emissions reporting programme.

Colt DCS GHG Emissions cover the following categories:

- **Scope 1:** Natural Gas, Fuel from Own Fleet, Refrigerants, Generation of Renewable Energy (solar PV) and Other Fuel (from generator use) consumption.
- **Scope 2:** Electricity consumption at sites, including heat & steam and operation of EVs.

- **Scope 3:** Purchased Goods & Services; Capital Goods; Fuel- and Energy-Related Activities (FERA); Waste Generated in Operations; Business Travel, Employee Commuting, and Downstream Leased Assets.

- Downstream Leased Assets emissions were calculated using the market-based electricity emission factors reported by our customers

GHG emissions include all Colt DCS countries:

The Netherlands, Germany, United Kingdom, France, Japan , India.

Emission Factors used:

- BEIS (DEFRA) 2024, 2023, 2022 & 2019 for Scope 1 across all sites, Scope 2 in the UK, and the following Scope 3 categories - Fuel-and-Energy-Related Activities FERA, Waste, Waste, Business Travel and Employee Commuting
- IEA 2024, 2023, 2022 & 2019 for Scope 2 electricity in Europe and Asia , Scope 3 categories (Homeworking and Downstream Leased Assets)
- Transition from EORA emission factors to the Carbon Trust EEIO emission factors for Scope 3 Purchased Goods and Services and Capital Goods spend-based GHG emission calculations in 2024, 2023, 2022, 2019

We are continually working towards best practices, collecting actual data (even if it is from previous years), and updating methodologies. In accordance with the GHG Protocol best practices and Colt DCS's rebaseline policy (defining significant change as +/- 5% of total emissions),

Restatements on Colt DCS GHG emissions reported in 2023:

- Categories 1 and 2 of Scope 3 for Colt (2019, 2022, and 2023) were restated due to an update on spend-based emission factors. We have moved from an EEIO source provided by EORA to one provided by the Carbon Trust.

