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Sustainability report 2023

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Introduction

CEO, Colt Technology Services

Welcome to our third annual Sustainability Report, one that comes at a time of significant growth and change at Colt.

In the last year we've made incredible progress on our environmental, social and governance (ESG) journey and welcomed over 1,000 new Colties with our acquisition of Lumen EMEA. As we move forward as a bigger, stronger and more diverse business, our commitment to ESG and delivering an exceptional customer experience will continue to set us apart.

Our new ESG strategy, launched in 2023, enables sustainability by design and is integral to the solutions we offer, the innovation we create and the relationships we form with customers and partners.

We maintained our platinum rating with EcoVadis, the highest score and a significant differentiator for Colt in our industry, and were recognised by the Carbon Disclosure project (CDP) for our leadership on our climate change disclosure and strategy. Since we set baseline measurements in 2019, we've reduced CO_2e emissions by 34% and continue to make great progress against our targets.

Colt is now a participant in the UN Global Compact, a voluntary initiative, based on CEO commitments, to implement universal sustainability principles and to take steps to support the UN Goals. I'm very proud to commit our support to the ten principles of the Global Compact.

One of Colt's values is that we know people matter, and this is more true than ever before as we integrate more than 1,000 new Colties, along with systems, processes and customers. We've continued to invest in fully understanding accessibility and to make our business open and accessible for all employees, including neurodivergent colleagues.

We introduced a Global Social Impact Strategy that aims to empower our communities through digital education and inclusion and I'm really pleased to share that, in 2023, our employees gave 867 days to volunteer at external charities and initiatives, an increase of 24% compared to 2022.

ESG is of critical importance to Colt, its customers, partners and our people. We are fully committed to continuing our ambitious agenda in 2024 and delivering significant results with the new people, infrastructure, partnerships and solutions the acquisition brings with it.

Thank you.

Keri Gilder, CEO, Colt Technology Services

CEO, Colt Data Centre Services

Today, achieving our vision 'to be the most trusted and customer centric data centre operator in the industry' means investing in a future that is better for people, places and the planet. It's exciting to be part of an industry that enables the rapid advances in technologies such as AI through its physical infrastructure. It makes it even more important for our business to ensure we design, build and operate our data centres responsibly.

2023 was a challenging year for our industry, with persistent inflation and volatile energy markets causing supply challenges, and more frequent climate extremes testing operations teams. Despite these difficulties, we have made important strides across the three strategic areas of our ESG strategy: Decarbonising our business, Connecting people and Safeguarding our company.

This report reflects on the key areas in which we have the greatest impact. We want our colleagues, customers and all other stakeholders we work with to understand what we have achieved so far and where we are going.

In 2023, progressing towards our Net Zero by 2045 target remained a focus area for our business. A milestone that impacts our global carbon footprint is the achievement of 100% renewable electricity procurement in Europe, India and partly Japan. We also continued to create a better understanding of our impact and dependency on biodiversity across our operations using the Biodiversity Net Gain metric as guidance.

As part of our mission to become an employer of choice, we took a big step by launching the AIM Framework that helps colleagues navigate their career journey. This framework was built on the insights gathered from our colleagues to understand what motivates them and what we can do to make sure they can perform at their best.

Another significant achievement this year was the record-breaking 74 customer satisfaction score (NPS). We will continue to be on the lookout for new opportunities that drive efficient operational and environmental outcomes for our customers.

These and many other initiatives earned us a variety of external benchmark awards, including a Platinum score by EcoVadis and an A- score by CDP Climate.

I'm deeply grateful for the support and trust from our customers, suppliers, partners, communities and colleagues in this journey. While reaching our ESG goals comes with many challenges, I remain optimistic as we continue to work together to shape a sustainable hyperscale data centre future.

Niclas Sanfridsson, CEO, Colt Data Centre Services

About this report

Colt Group is a global digital infrastructure company and data centre services group. It operates two businesses: Colt Technology Services (Colt) and Colt Data Centre Services (Colt DCS). The Colt Group Sustainability Report covers the period 1 January to 31 December 2023, unless otherwise stated. The report includes performance data across the Environmental, Social and Governance (ESG) material issues identified and prioritised as part of the materiality assessment conducted in 2023.

The report covers Colt Group. Colt Group completed the acquisition of Lumen's EMEA business on 1 November 2023. Given the timing of the acquisition, the information and data included in this report excludes Lumen EMEA unless otherwise stated. The chapter 'Focusing on our people' will provide some data on new Colties from Lumen. Comprehensive ESG data will be included in next year's Sustainability Report.

This report was developed in accordance with the Global Reporting Initiative (GRI) standards. The sustainability activities reported by Colt Group have been independently verified by the British Standards Institution (BSI). More information can be found in the appendix, with the external assurance statement by the BSI.

For more information about Colt Data Centre Services (Colt DCS), please consult our separate **2023 Sustainability Highlights Report**.

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2023 highlights

34% reduction of total CO_2e emissions since 2019

Global Social Impact Strategy introduced for Colt

30% of our fleet is now fully electric

33 new early career joiners (97% retention rate)

24% increase in days volunteered

74 Colt DCS Global NPS score
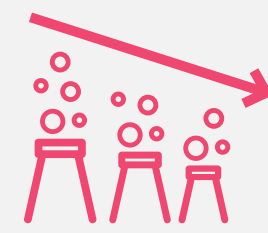
71% reduction in Scope 1 and 2 emissions since 2019

76 and 77 Colt NPS score for EU and Asia

78% of the Scope 2 electricity procured for our sites globally is renewable

73% of our suppliers engaged on ESG topics

1,789 people trained through our Connection+ training days

31.3% People employed by Colt Group who are female*

*Headcount as of 31st December 2023. Please, refer to Our People and Culture for People Employed by Colt Group definition.

About Colt

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About Colt

Colt Technology Services

Colt Technology Services is a global digital infrastructure company which creates extraordinary connections to help businesses succeed. Powered by amazing people and like-minded partners, Colt is driven by its purpose: to put the power of the digital universe in the hands of its customers, wherever, whenever and however they want.

Since 1992, Colt has set itself apart through its deep commitment to its customers, growing from its heritage in the City of London to a global business spanning 40+ countries, with over 6,000 employees and more than 80 offices around the world. Colt's customers benefit from expansive digital infrastructure connecting 32,000 buildings across 230 cities, more than 50 Metropolitan Area Networks and 250+ Points of Presence across Europe, Asia, the Middle East, Africa and North America's largest business hubs.
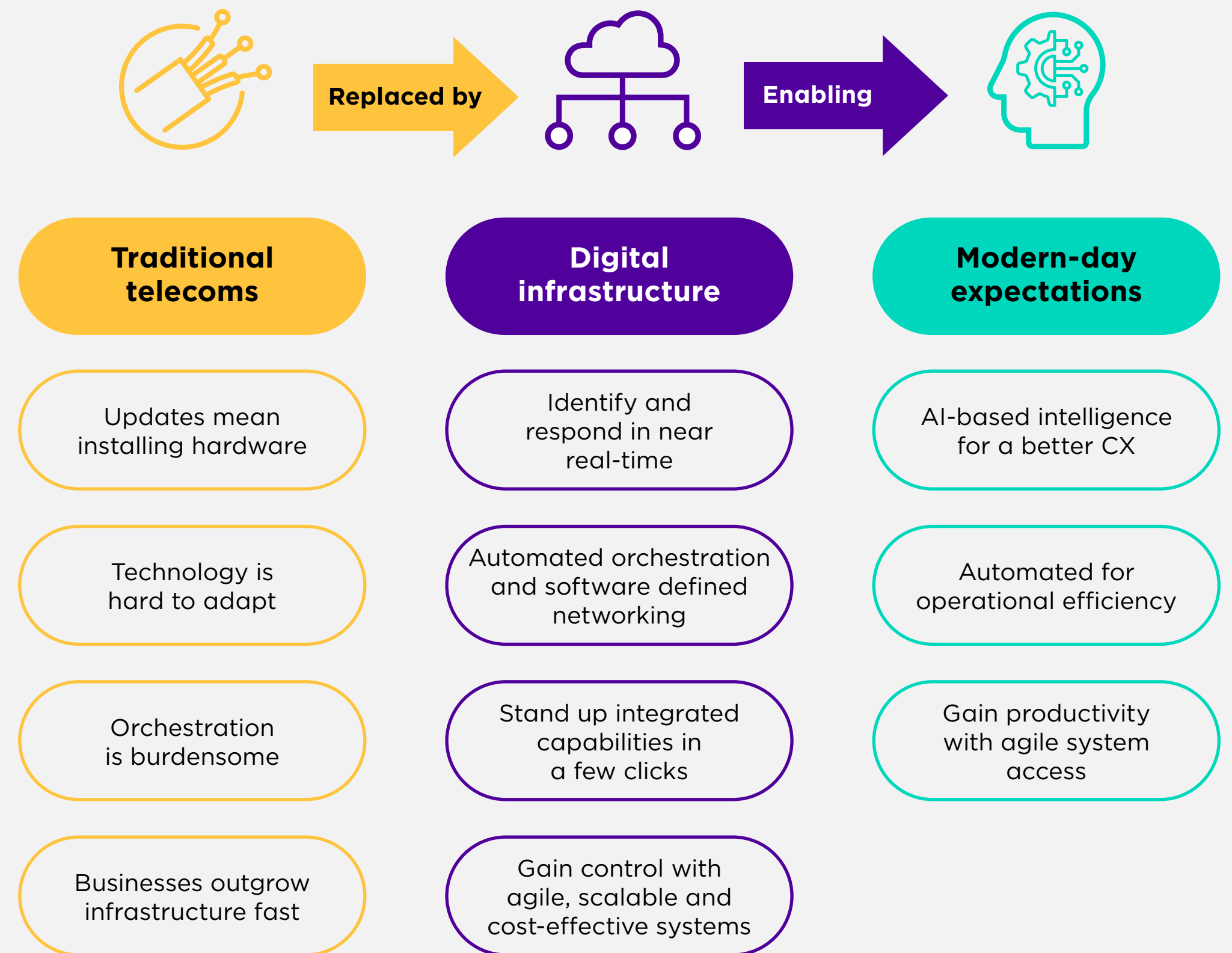
Privately owned, Colt is one of the most financially sound companies in the sector. Obsessed with delivering industry-leading customer experience, Colt is guided by its dedication to customer innovation, by its values and its responsibility to its customers, partners, people and the planet.

In November 2023, Colt announced the acquisition of the Lumen EMEA business. The acquisition provides greater choice and expansive global capabilities to enterprises investing in powerful, sustainable digital infrastructure. Colt's customers now have access to an extended portfolio of additional services, including new security technologies, market-leading SASE products, managed hosting and professional services.

Please consult the Colt website for more information about **the company**, **product portfolio** and **coverage map**.

Powered by like-minded partners and amazing people, we are driven by a common purpose to put the power of the digital universe in the hands of our customers, wherever, whenever and however they want

Leading the industry evolution

Replaced by → Enabling →

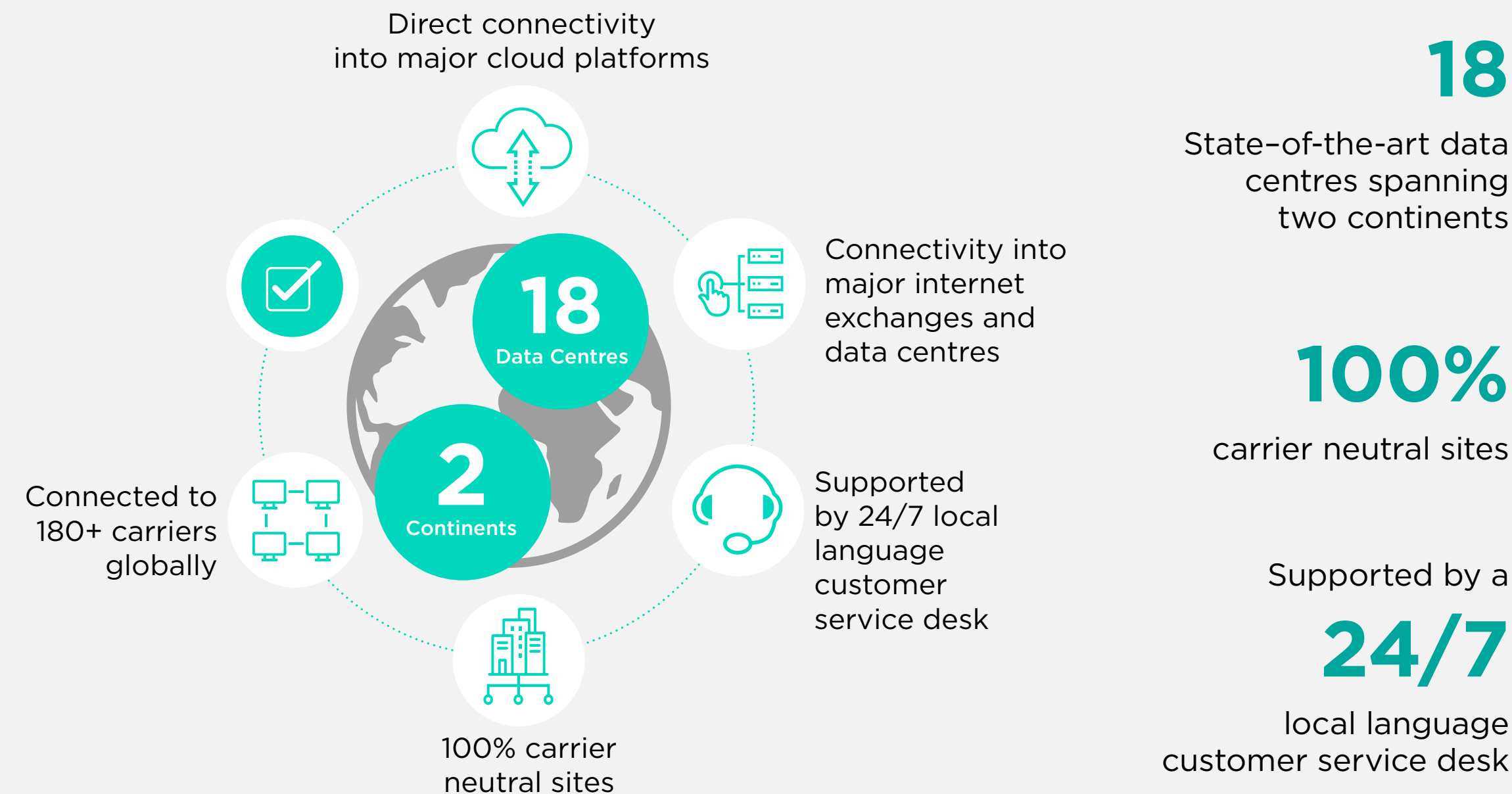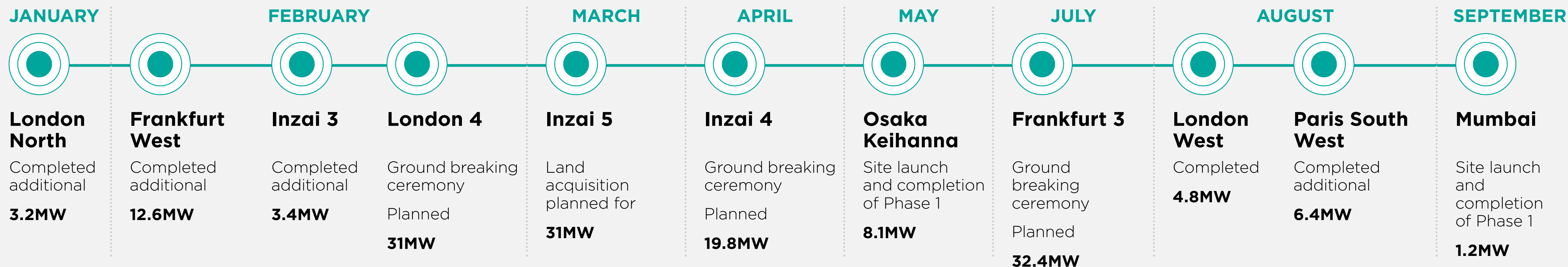| Traditional telecoms	Digital infrastructure	Modern-day expectations
Updates mean installing hardware	Identify and respond in near real-time	AI-based intelligence for a better CX
Technology is hard to adapt	Automated orchestration and software defined networking	Automated for operational efficiency
Orchestration is burdensome	Stand up integrated capabilities in a few clicks	Gain productivity with agile system access
Businesses outgrow infrastructure fast	Gain control with agile, scalable and cost-effective systems	

Colt Data Centre Services (Colt DCS)

Colt DCS was established as an operationally independent business in 2015 to accelerate its ambitious growth plans. The following year, it secured a number of global expansions to add to its data centre footprint within key markets across Europe and Asia. Its services in the design, build, delivery and operational management of hyperscale data centres allows 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.

The company provides data centre services to some of the largest cloud service providers and large enterprise businesses across state-of-the-art data centres in Europe and APAC, being carrier and internet exchange neutral. Its mission is to become the most trusted and customer-centric data centre operator. This exemplifies our commitment to the highest customer excellence standards and is used as a framework to deliver long-term sustainable and profitable growth. This year, the business successfully completed a legal separation, marking a significant milestone in its growth as a distinct entity. While still part of the Group, the separation enables the company to personalise its services, meet customers' needs and shape its own unique culture.

A complete description of the services the business provides and its locations are presented on the **Colt DCS website**.

Direct connectivity
into major cloud platforms

18
Data Centres

2
Continents

Connectivity into major internet exchanges and data centres

Supported by 24/7 local language customer service desk

100% carrier neutral sites

Connected to 180+ carriers globally

18
State–of-the-art data centres spanning two continents

100%
carrier neutral sites

Supported by a
24/7
local language customer service desk

2023 Colt DCS developments

JANUARY	FEBRUARY		MARCH	APRIL	MAY	JULY	AUGUST		SEPTEMBER
London North	**Frankfurt West**	**Inzai 3**	**London 4**	**Inzai 5**	**Inzai 4**	**Osaka Keihanna**	**Frankfurt 3**	**London West**	**Paris South West**	**Mumbai**

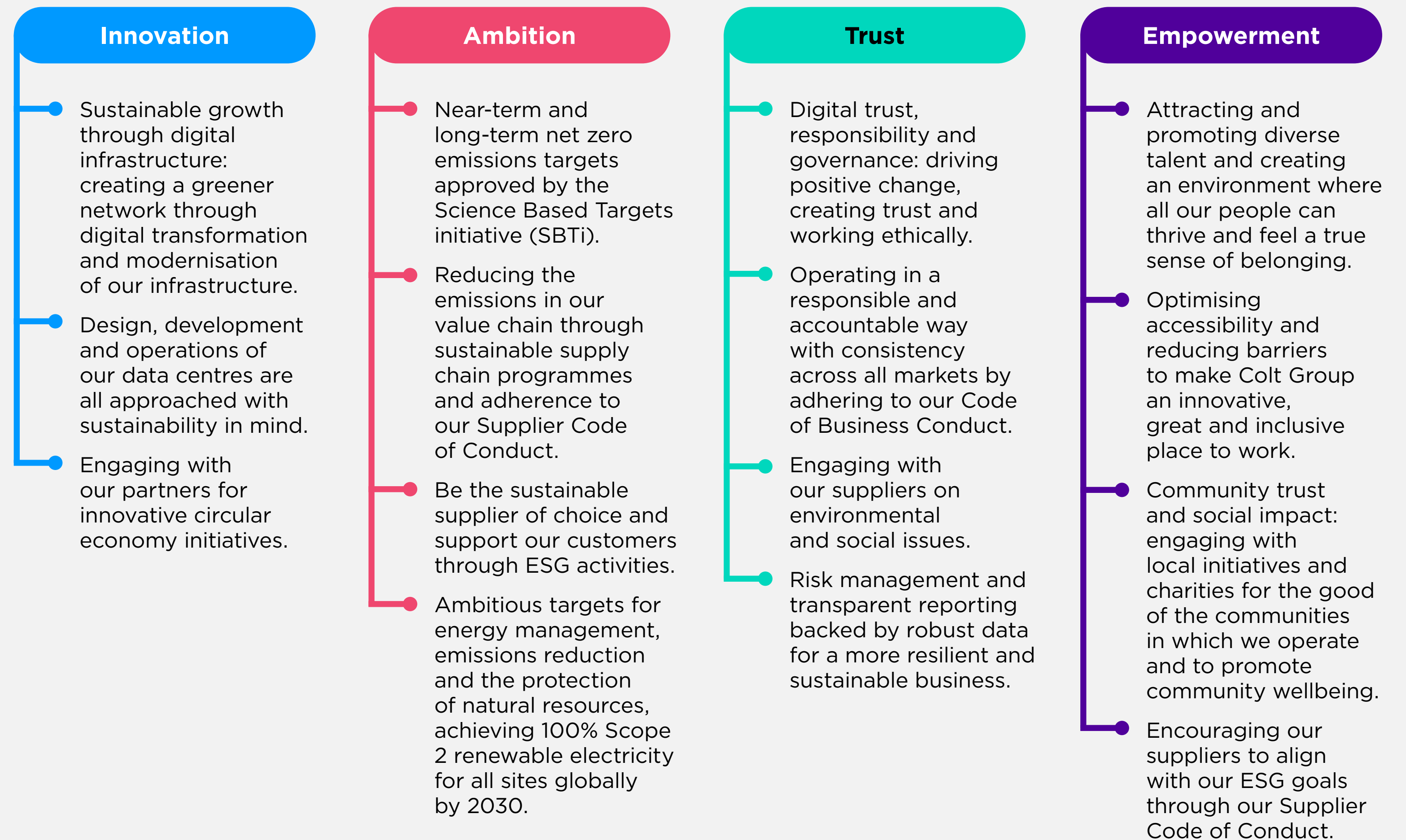| JANUARY	FEBRUARY	FEBRUARY	MARCH	APRIL	MAY	JULY	AUGUST	AUGUST	SEPTEMBER
Completed additional **3.2MW**	Completed additional **12.6MW**	Completed additional **3.4MW**	Ground breaking ceremony Planned **31MW**	Land acquisition planned for **31MW**	Ground breaking ceremony Planned **19.8MW**	Site launch and completion of Phase 1 **8.1MW**	Ground breaking ceremony Planned **32.4MW**	Completed **4.8MW**	Completed additional **6.4MW**	Site launch and completion of Phase 1 **1.2MW**

Colt Group's
ESG strategy

Colt Group's ESG strategy

Last year, we conducted a comprehensive refresh of our **materiality assessment**. The insights from the assessment have been the basis for Colt Group's ESG strategy, which launched in 2023.

Our central role as a digital infrastructure and data centre services provider gives us a platform to contribute to a more sustainable society through innovation and the promotion of technological solutions

ESG is at the heart of everything we do, the solutions we offer and the pioneering innovations we create

We advance our efforts towards a more sustainable future through the following approaches:

Innovation

- Sustainable growth through digital infrastructure: creating a greener network through digital transformation and modernisation of our infrastructure.
- Design, development and operations of our data centres are all approached with sustainability in mind.
- Engaging with our partners for innovative circular economy initiatives.

Ambition

- Near-term and long-term net zero emissions targets approved by the Science Based Targets initiative (SBTi).
- Reducing the emissions in our value chain through sustainable supply chain programmes and adherence to our Supplier Code of Conduct.
- Be the sustainable supplier of choice and support our customers through ESG activities.
- Ambitious targets for energy management, emissions reduction and the protection of natural resources, achieving 100% Scope 2 renewable electricity for all sites globally by 2030.

Trust

- Digital trust, responsibility and governance: driving positive change, creating trust and working ethically.
- Operating in a responsible and accountable way with consistency across all markets by adhering to our Code of Business Conduct.
- Engaging with our suppliers on environmental and social issues.
- Risk management and transparent reporting backed by robust data for a more resilient and sustainable business.

Empowerment

- Attracting and promoting diverse talent and creating an environment where all our people can thrive and feel a true sense of belonging.
- Optimising accessibility and reducing barriers to make Colt Group an innovative, great and inclusive place to work.
- Community trust and social impact: engaging with local initiatives and charities for the good of the communities in which we operate and to promote community wellbeing.
- Encouraging our suppliers to align with our ESG goals through our Supplier Code of Conduct.

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You can read more about Colt's ESG strategy on **the website**. More information on the Colt DCS strategy can be found on **its homepage** and in the 2023 Sustainability Highlights Report.

The Colt Board oversees all aspects of our ESG approach with responsibility for determining strategy and prioritisation of key focus areas.

During 2024, in preparation for reporting under the new EU Corporate Sustainability Reporting Directive (CSRD), we will complete a Double Materiality Assessment.

We are fully committed to supporting the **UN Sustainable Development Goals (SDGs)**. You can find more details on the Colt Group's contribution to the SDG goals and targets in the Appendix.

In 2023, we were awarded the EcoVadis platinum rating for the second consecutive year. This is the highest rating and places us in the top one percent with regards to how well we have integrated sustainability principles into our business and management systems.

In 2023, we received an A- from the **Carbon Disclosure Project (CDP)** for our outstanding environmental performance, positioning us within the leadership category for sustainability.

We received an A-grade rating the CDP **Supplier Engagement Rating (SER)** questionnaire for the second year in a row.

Colt Group has been a participant in the **UN Global Compact** since 2023. The UNGC is a voluntary initiative, based on CEO commitments to implement the universal sustainability principles and to take steps to support the UN Goals. We are committed to submitting a Communication of Progress (COP) to the UNGC in 2024.

Growing stronger through expansion and innovation

Growing stronger through expansion and innovation
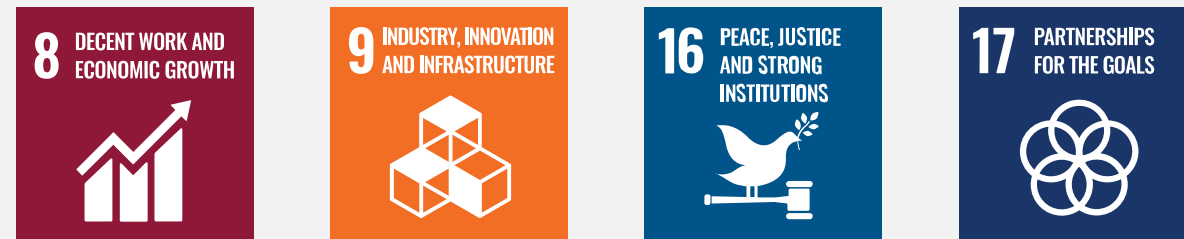
Expansion

The acquisition of Lumen EMEA marked a pivotal point for Colt, providing greater choice and expansive global capabilities to enterprises investing in powerful, sustainable digital infrastructure as the driving force behind its operations.

It elevates Colt to being one of the world's largest business-to-business digital infrastructure companies and an influential global player. We already had a close partnership with Lumen EMEA and the acquisition reflects our shared values and an ongoing commitment to creating a fair and equitable environment for our people and our planet.

It gives us access to new talent, systems and platforms, partners and exciting new markets. The changes also give us an even stronger platform to focus on providing solutions to ESG issues and we are currently in the process of integrating teams, data, processes and systems.

We are committed to transparency throughout the integration process while we work towards reporting on all ESG aspects of the newly expanded business.

Colt DCS also experienced a period of expansion and we completed a legal separation from the rest of the group. This marks a significant milestone and with this development, we can now focus efforts more effectively to provide a more specific service to customers.

2023 has been a period of incredible growth, marked by the construction of new data centres and the development of our personnel through a focus on building trust. Our five global TRUST values reflect what we believe in, how we operate, and how we interact with each other: Trust, Respect, Unite, Sustain and Trailblaze.

Innovation at Colt Group

Innovation has always been at the core of what we do, from driving new developments on digital infrastructure to offering on-demand solutions, and from providing smart collocation and connectivity solutions to building sustainable hyperscale data centres of the future.

We work with the world's biggest technology companies to connect customers wherever they need it. This positions us as a major player in the technology sector making us a significant enabler to a more sustainable future and we are committed to playing a leading role in making that happen.

We continued with a transformation programme to improve connectivity and network services, make the operation of the network more intelligent, and bring IT workloads closer to the user.

We invested to optimise the energy efficiency of the network. Our Software Defined Networking (SDN) improves network resource utilisation. Network Function Virtualisation (NFV) enables us to move to a single centralised server, reducing the amount of hardware electronics required to deliver network services, making the network more energy efficient.

Edge Driven Networks (EDN) help optimise energy usage by reducing the amount of data passing through the network. By running applications at the user edge, data can be stored and processed closer to the user. This leads to lower latency and a significant reduction in energy consumption, reducing both cost and environmental impact.

We believe we can provide the technological innovations that will support the transition to a more sustainable future

Multicasting secure data over the cloud

Colt

In 2023, Colt built on the successful Proof of Concept (PoC) we ran in 2022 to launch Colt Market Data in the Cloud, our multicast service for Capital Markets. It provides real-time market data feeds for equities, derivatives, commodities and FX from more than 80 exchanges and liquidity venues worldwide.

The innovation distributes multicast data in the cloud without the need for conversion software, reducing complexity and cost. The service is fully managed by Colt, so customers do not need to be physically connected. This has the crucial benefit of moving the workload from the customer's premises to the cloud, offering a sustainable alternative to traditional on-premise set-ups, with no additional equipment required for deployment.

We have developed this service with leading cloud provider Amazon Web Services and it uses our Dedicated Cloud Access, which provides secure and reliable private Ethernet and IP network connectivity.

Read more about this on our **website**.

Expansion of On Demand as network requirements change

Colt

Colt has continued to innovate its On Demand solution to meet the changing needs of global customers. In 2023, we extended Colt On Demand, our Network as a Service solution, to an additional 10 countries including the US, Australia and Poland. It now covers millions of business locations in over 180 countries.

This means that organisations can flex and scale their network infrastructure using only the network services they need, increasing flexibility, saving money, reducing risk and cutting unnecessary energy consumption. On Demand is supported by the last-mile access networks of best-in-breed carriers through one portal.

Customers in the UK and France also have access to a new virtual router which has been specifically designed to help businesses reduce emissions and meet their sustainability targets. Unlike traditional physical routers positioned on a business' premises, the router is located in the cloud, saving energy and physical space. It will become available in other countries in 2024.

Read more about this on our **website**.

Creating our digital future

Colt

Colt is simplifying its own technology ecosystem to create a simpler, more automated and modern business which will support and drive the delivery of our strategy. It will allow us to scale with demand, make us an easier and more responsive business to work with and help us to deliver our services more efficiently.

Following the acquisition of Lumen EMEA, we will be one of the largest B2B digital infrastructure companies in EMEA and we want to ensure that we are ready to capitalise on the opportunities. The transformation strategy rests on five pillars: transform our customer journeys, digitalise our network delivery and assurance, re-engineer our product life cycle, modernise our corporate services and build strong technology foundations.

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The lowest-emission route
Colt

Embedded in Colt's portfolio of capabilities, we are developing the technology to offer an intent-based order menu so that customers can select the best route in the network based on different criteria, such as the shortest path, lowest delay or the lowest loss.

Different paths for data transmission have different environmental impacts. We built 'Skylight - The Lowest-emission Route' capability during 2023, ready for the first pilot in the first half of 2024. The resulting data will enable customers to select their own routing option based on environmental performance. For example, the lowest-emission route from Italy to Germany is through France, because France has a lower emission factor than other countries.

The Skylight platform uses live data from the network, which includes bandwidth, latency and packet loss, combined with power, CO2 emissions and efficiency. The results are available through a graphical user interface, providing real-time information and traffic analysis. This enables well-informed optimisation decisions, leading to reductions in power consumption and lower operating expenses, in turn helping our customers meet sustainability targets.

We have continued the investment in research and innovation on incubating smart applications to help customers drive their own digital transformation. We have successfully progressed a number of Smart X incubation activities across different verticals jointly with customers and technology partners:

Smart buildings

We have successfully developed and deployed a platform in Colt headquarters to collect building data to facilitate improved emissions reporting, analytics and diagnostics, enabling AI-driven energy and CO_2 emissions optimisation. The use of artificial intelligence to control the heat and air configuration in the building is expected to produce a 30% building energy consumption and CO_2 emissions reduction.

Smart offices

We have developed a Private 5G network as a Proof of Concept to show how indoor wireless technology can support the office of the future, including telepresence robots in the workplace and smart energy consumption management.

Smart manufacturing

In collaboration with IBM, we have developed a smart manufacturing solution to help customers in their digitalisation strategies. Initial use cases include visual inspection, supply telemetry and the integration of information technology with operational technology systems (IT/OT).

Smart cities

We have installed outdoor telecommunications cabinets to bring edge computing closer to end business customers. We use Colt private and internet connectivity, combined with sensor technology, to monitor a wide range of variables and work with local authorities to collect the data and make improvements to the local environment. A number of digital transformation use cases have been validated, including smart city IoT and wifi, edge gaming and private 5G fixed wireless access.
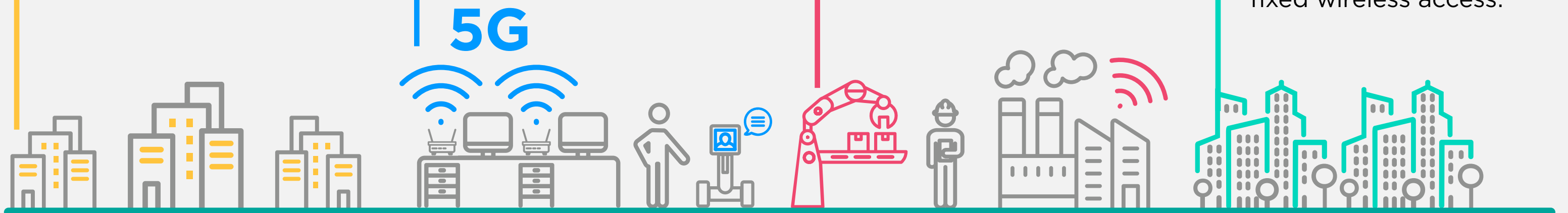
Colt and AI

AI is changing how enterprises manage their network services to boost efficiencies, generate insights and support the development of automation. There is constant pressure to transfer ever larger amounts of data in ever shorter amounts of time with minimum latency. AI can provide the high-speed decision-making required.

We have begun deploying AI capabilities into our management platform to create a network that is self-organising, self-healing and self-optimising.

Using AI, Colt has been able to reduce processing time significantly. There is further potential for the combination of AI and machine learning to benefit smart manufacturing and smart systems in general, improving customer experience and delivery of services.

AI to support our efforts to attract and retain diverse talent

We audited our recruitment processes and discovered that job descriptions can unconsciously include barriers to attracting a diverse workforce, including the language being used, the qualifications asked for and experience sought in the role requirements.

Following these recommendations, our recruitment team now uses the Job Analyser tool, a plug-in within SAP Success Factors, to audit each new job application. It is now available to all hiring managers, who are encouraged to check each advertised vacancy before publication. Job Analyser was initially introduced and promoted with the aim of achieving 70% gender neutral job adverts on the company website. The refreshed Employee Value Proposition (EVP) has increased the number of roles offered to women from 40.8% of all roles in 2022 to 48.6% in 2023.

We are building on these basic AI tools to develop more advanced ways in which AI can help our recruitment and retention in the coming years.

Designing data centres for the future

The design and build of Colt DCS new sites provide the greatest opportunity to improve the environmental performance of our current data centre portfolio. Every new data centre must meet our strict requirements as outlined in our Global Reference Design Framework. We aim to use renewable energy where possible and continue to improve operational efficiency, transition to alternative cooling and fuel sources and strive to achieve LEED Gold or equivalent in all future data centres.

In our new data centres, we aim to install on-site solar panels to cover electricity consumption for our offices as well as electric vehicle (EV) charging points.

We are building hyperscale data centres, which we define as being built over 10,000 square metres, containing power in the range of an average of 25+MW. We are experts at operating these large data centres, creating and delivering greater efficiencies.

The new hyperscale data centre we are building in Mumbai, where there is increasing demand, is a very good example. Our Mumbai data centre was recently awarded a Platinum rating by the India Green Building Council (IGBC). Its Green Data Centre rating is a widely used green building rating system in India. The Platinum rating is an indicator of a building designed with overall sustainability and occupant wellbeing in mind, from construction to operations.

By aligning our Mumbai data centre with the requirements outlined in the IGBC, we are lowering our greenhouse gas emissions, reducing operational costs and conserving resources while prioritising the health of our employees and contractors.

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Collaboration

Colt Group is committed to working with partners that share its approach to ESG. We passionately believe in collaboration and we want to be the first choice for our customers, suppliers and partners.

In this industry, the distinctions between customers, suppliers and partners are not always clearly defined: a client can be both a partner or a supplier, and a supplier today can become a partner in a joint project in the future. We therefore try to take the same collaborative approach to all our business relationships.

You can find more information about our partners on **colt.net**.

Securing the cloud   **Colt**

We have partnered with Zscaler, the cloud security market leader, to offer a security as a service solution to empower organisations to protect their network. The service accelerates digital transformation and migration to cloud services by providing seamless zero trust security and protection to companies' connectivity.

By replacing the range of security hardware that is normally required, it allows organisations to be more agile, efficient and resilient. Data security and access security are built-in for any hyperscale cloud or Software as a Service (SaaS) application. In addition, the service supports zero trust access to legacy applications, securing the critical digital assets of our customers.

Read more about this on our **website**.

Customer success

We measure customer success by tracking our Net Promoter Score (NPS), a key metric indicating our ability to meet our customers' needs. A strong NPS score is synonymous with consumer loyalty and satisfaction.

Colt DCS NPS Global

72
74
0   10   20   30   40   50   60   70   80

Colt DCS NPS Asia

69
71
0   10   20   30   40   50   60   70   80
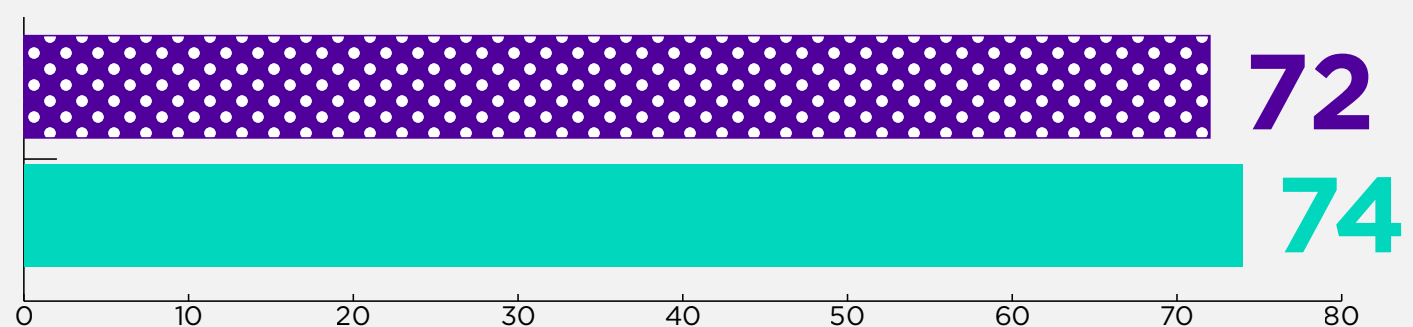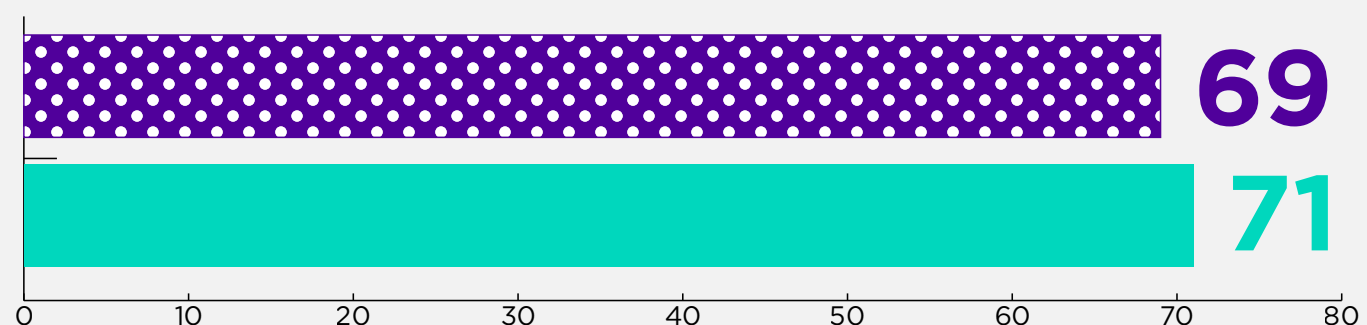
Colt DCS NPS Europe and UK

76
79
0   10   20   30   40   50   60   70   80
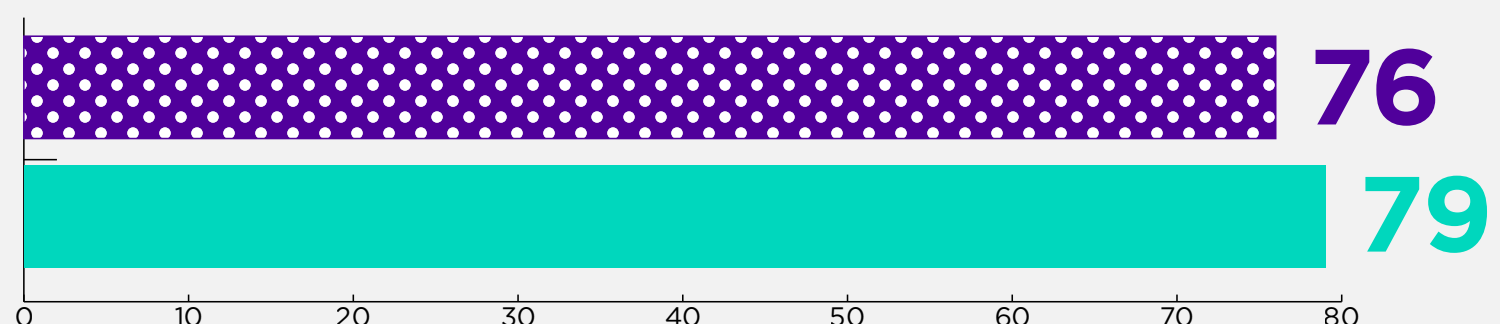
Colt NPS reaches record breaking scores of 76 and 77 for Q4 in Europe and Asia

Colt DCS improved its global NPS to an all-time high of 74

Colt EU NPS (Q4)*

63
76
0   10   20   30   40   50   60   70   80

Colt Asia NPS (Q4)*

51
77
0   10   20   30   40   50   60   70   80
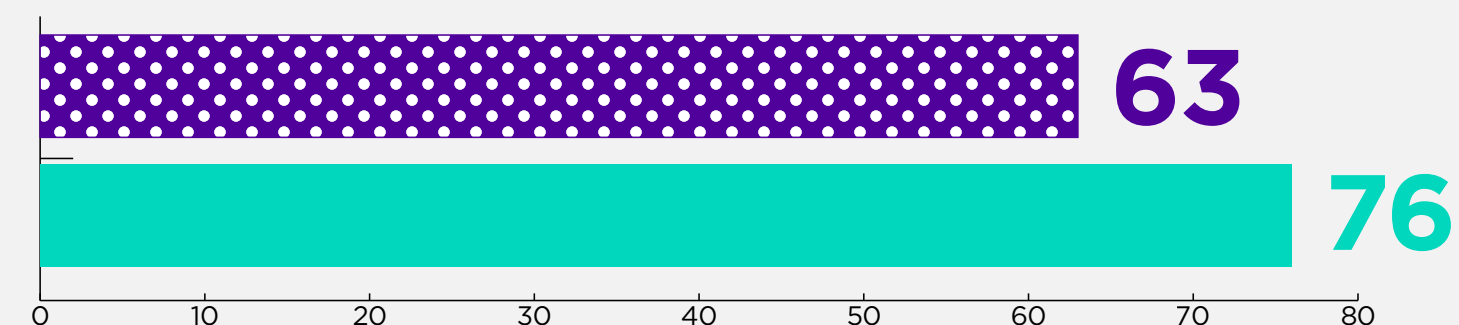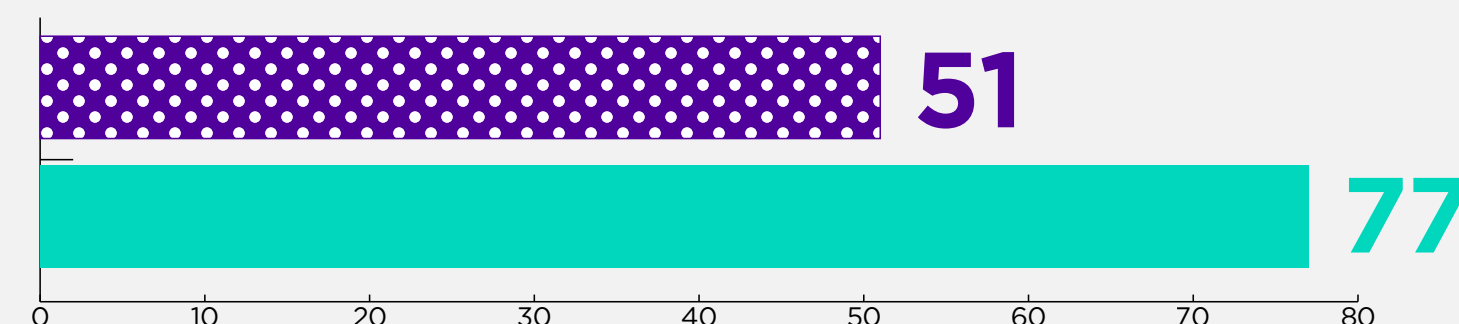
■ 2022   ■ 2023

*Colt compares favourably with the NPS Telecom Industry Benchmark which was 31 in 2021. Source: B2B benchmarks report copyright customergauge © 2021.

Colt customer reference programme

Colt

In 2023, Colt invested in biochar carbon removal certificates amounting to 26 tonnes of CO2e removal. These were awarded to customers as part of a customer reference programme to build on our shared values of sustainability.

Carbon calculator and internal reduction of emissions

Colt

The carbon calculator initiative came out of a sustainability hackathon held in 2022, hosted by Colt. The resulting technology would be used to calculate and allocate the emissions per customer based on real-time usage, considering geographic distance covered, energy considerations, maintenance needs and equipment options: all key benefits of moving away from spend-based calculations.

In 2023, we completed a Proof of Concept to calculate the emissions of Wave and Private Wave services focusing on the UK, France and Germany. The tool calculates the service level emissions of each product covering Scope 1 emissions, including fuel usage and ground transport for network commissioning and ongoing network maintenance services. Scope 2 emissions include the electricity used to cool network equipment devoted to the client's specialised service. The calculation does not take into account the emissions associated with the initial cable network installation.

Improved customer portals

Colt DCS

Colt DCS successfully launched its new Customer Portals to streamline and enhance interactions with clients. The portal offers several benefits to customers and employees to efficiently manage customer requests, incidents and planned work in one single portal. The platform offers Customer Workgroups, giving customers full control over access to their space. The technology, customer experience and operations teams have delivered training to over 100 colleagues and organised customer demonstrations.

The portal was successfully launched to customers in the UK, India, the Netherlands, Germany and France. In 2024, Colt DCS is planning to launch the portal to customers in Japan. Future phases of the customer portal will allow integration with customer ticketing systems and the ability to request a wider range of services, including audit support, connectivity services and booking facilities.
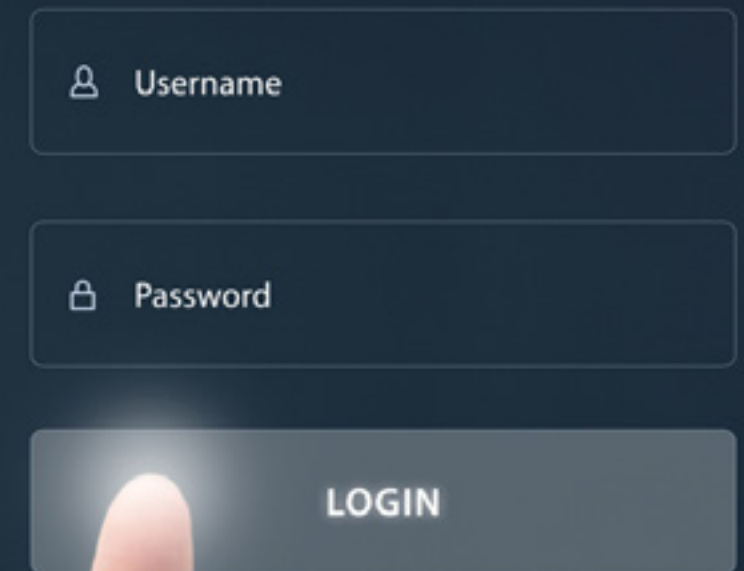
Customer Loyalty Month

<div style="float:right">**Colt DCS**</div>

In April 2023, Colt DCS organised Customer Loyalty Month, a dedicated period designed to celebrate and appreciate valued customers, both internally and externally. Internally, the month was marked by various initiatives aimed at recognising and fostering customer-centricity throughout the organisation, including the Customer Centric Employee Awards and drop-in and learn sessions to further educate and empower employees to better serve customers. Over 90 employees were nominated for the Customer Centric Employee Award, 50% from Japan, followed by France and the UK. The month serves as a reminder of the vital role customers play in the company's success, and underscores dedication to prioritising their satisfaction and loyalty.
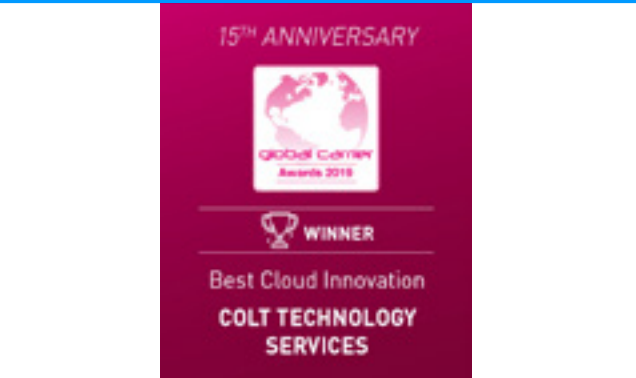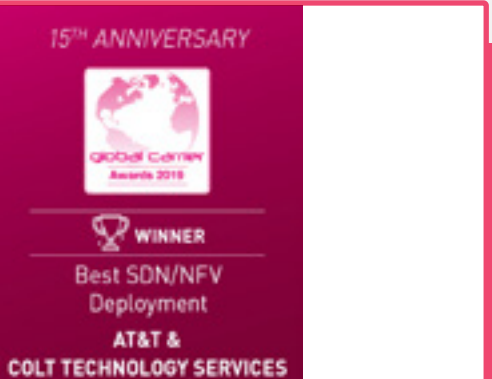
Colt wins Customer Value Leadership Award

<div style="float:right">**Colt**</div>

Frost and Sullivan recognised Colt with its Best Practices Global Customer Value Leadership Award in network enterprise services. In the award citation, Frost and Sullivan said that we "consistently develop growth strategies based on a visionary understanding of the future", also highlighting our success in optimising new challenges and opportunities to meet our global customers' evolving needs.

Colt was measured against rigorous criteria covering customer and business impact. The customer element includes price/performance value, customer purchase experience, customer ownership experience, customer service experience and brand equity. The business element of the award includes financial performance, customer acquisition, operational efficiency, growth potential and human capital.

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Our industry awards

Overall portfolio, strategy and execution

IDC Major Player Award 2023

Frost & Sullivan 2023 Best Practices Award

Bronze award for Best Customer Service Team (Large)

Gartner Eye on Innovation Award 2022

Omdia Market Share 2022

Cloud connectivity

Asian Telecom Awards 2023

Catalyst Team Award Winner

Gigaom Radar Report Network as a Service

Colt Dedicated Cloud Access Best Cloud Innovation

Network and coverage

Outstanding Transformation Strategy

Best Data Centre Interconnect Provider

Automation and SDN/NFV Innovation

Frost & Sullivan SD WAN Company of the Year Award

Digital Technology Innovation Award

Colt and AT&T MEF LSO Sonata API application

Collaboration across our value chain

At Colt Group, we want to work with suppliers who can support our ESG journey. Our **Supplier Code of Conduct** and our Sustainable Procurement Policy set out the standards of sustainability and corporate governance that we expect them to adhere to.

We consider sustainability criteria in the selection, management and evaluation of our suppliers and we use our Vendor Risk Management System (VRM) and RFP scoring to measure ESG supplier performance. All new suppliers with an estimated spend greater than €50k are subject to the full VRM Standard as a condition for approval. Existing suppliers are assessed when their contracts are due for renewal.

The VRM 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. We also assess suppliers' approach to Diversity, Equity and Inclusion and we are keen to improve this part of our work with our value chain. We also have a target to use more SMEs and local suppliers.

73%
of our suppliers have been engaged on ESG topics (70% in 2022)
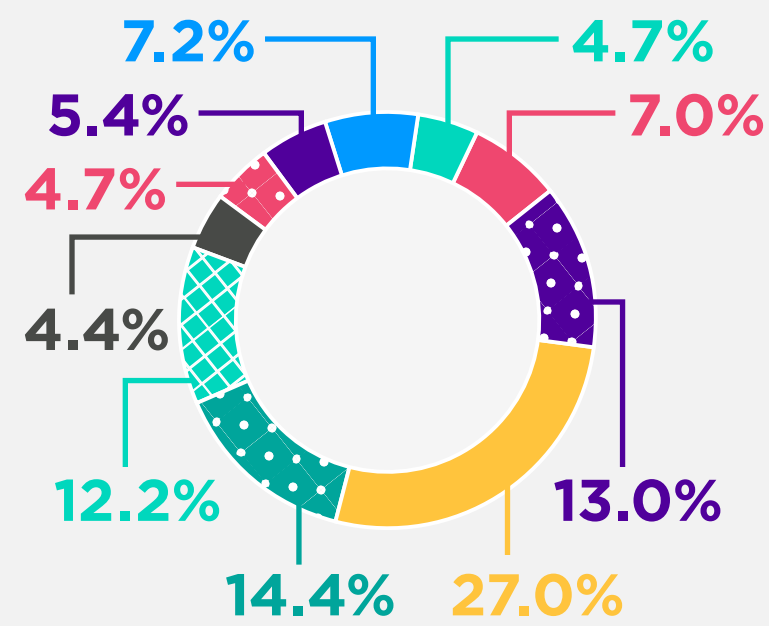
4,600+
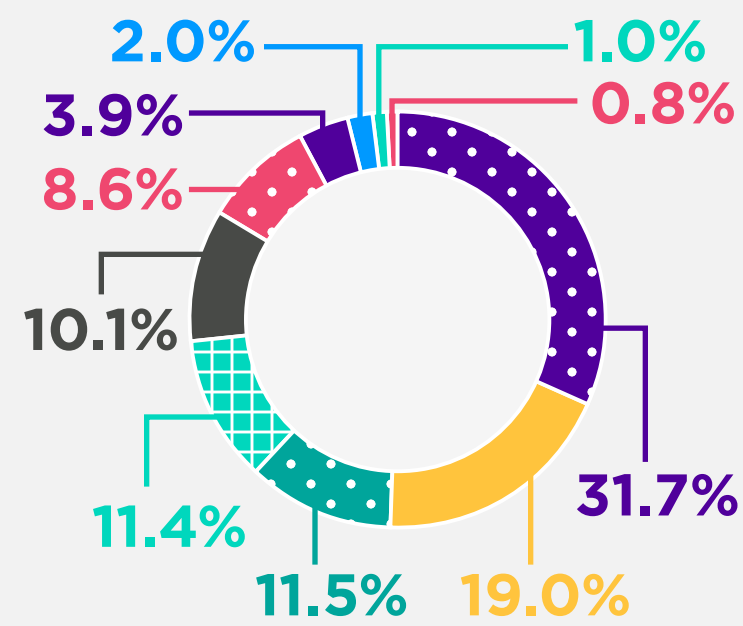suppliers from 55 countries in 2023 (Colt Group)

89%
of our suppliers have signed our Supplier Code of Business Conduct

Colt suppliers*

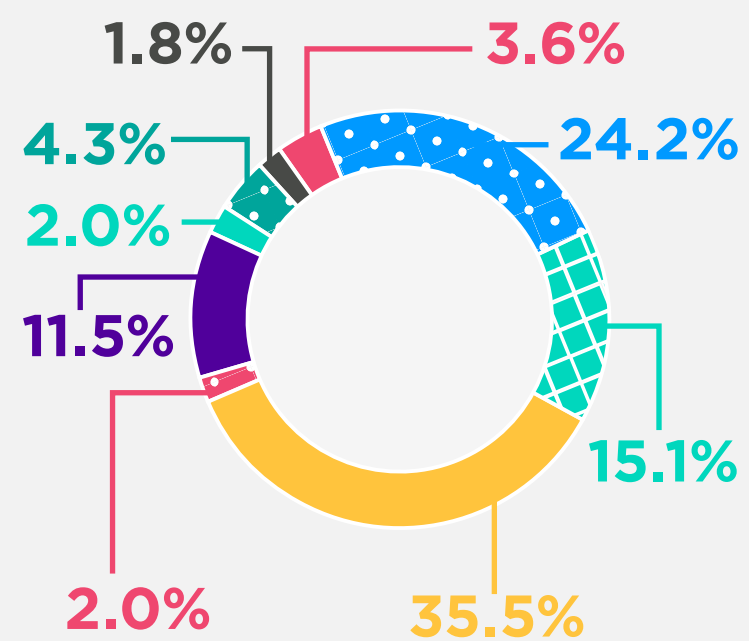### Overall number of suppliers*

7.2% | 4.7% | 7.0% | 5.4% | 4.7% | 4.4% | 12.2% | 14.4% | 27.0% | 13.0%

Suppliers based on spend**

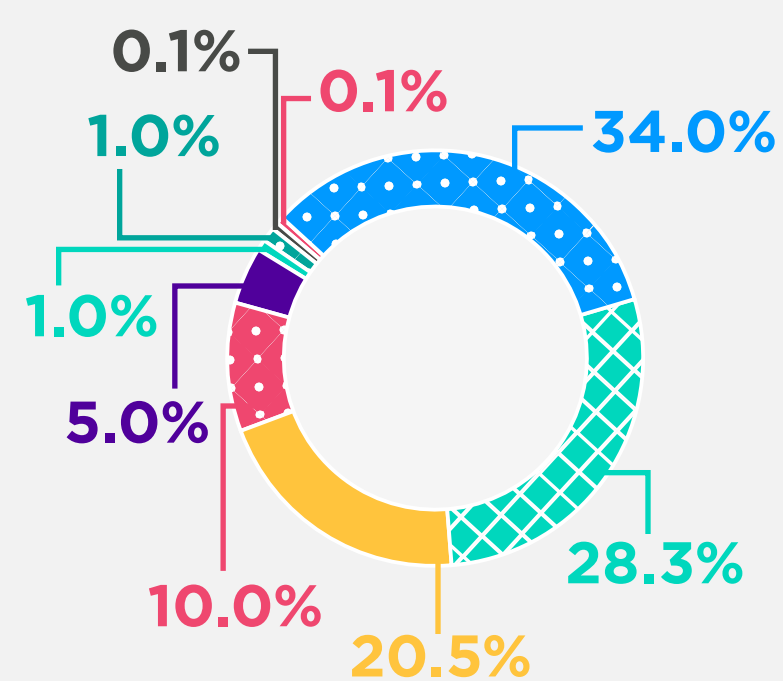2.0% | 1.0% | 0.8% | 3.9% | 8.6% | 10.1% | 11.4% | 11.5% | 19.0% | 31.7%

Legend:
- Other Licensed Operators (OLO)
- Other***
- Colocation
- Network Infrastructure Services
- Network Electronics & Infrastructure Equipment
- Professional Services
- Network Backbone
- Facilities
- Human Resources Services
- Marketing

Colt DCS suppliers*

Overall number of suppliers*

1.8% | 3.6% | 24.2% | 4.3% | 2.0% | 11.5% | 2.0% | 35.5% | 15.1%

Suppliers based on spend**

0.1% | 0.1% | 34.0% | 1.0% | 1.0% | 5.0% | 10.0% | 20.5% | 28.3%

Legend:
- DCS Building Maintenance & Construction
- Utilities & Energy
- DCS Services
- DCS Third Party DC Space
- DCS Equipment Maintenance
- DCS Security
- DCS IT
- DCS Marketing
- Others

*Colt Group supplier types based on number of suppliers (31st December 2023).

**Spend considers annual 2023 supplier spend.

***Other includes: Real Estate, SWIN, Travel and Events, Software, Financial Services, Legal Services, Fleet, Insurance, Hardware, Voice Services, Logistics and Freight, and Telephony. Colt DCS purchases energy on behalf of Colt which explains the absence of Utilities % energy from this chart.

We understand that the changes in the ESG reporting landscape will require a robust approach to data quality and insights, particularly as we move closer towards disclosure against the Corporate Sustainability Reporting Directive (CSRD). We continue to invest in improved reporting capabilities, incorporating quarterly reports that provide ratings to assess ESG supplier performance. ESG performance is always included in our Quarterly Business Reviews with suppliers.

We actively engage with our suppliers on a wide range of ESG topics. In 2023, more than 71% of our suppliers engaged with us on environmental criteria via VRM and Quarterly Business Reviews (QBRs).

We are currently in the process of mapping all new suppliers coming over from Lumen EMEA and will define a plan to incorporate them into our existing supplier engagement programme.

Colt Group Suppliers	2022	2023	Increase in the number of suppliers engaged/evaluated (%)
Number of suppliers engaged on environmental sustainability matters*	1,505 (32.6% of all active suppliers)	1,681 (36.3% of all active suppliers)	11.7%
Number of suppliers evaluated on environmental criteria	838 (18.2 % of all active suppliers)	1,206 (26.0% of all active suppliers)	43.9%
% of suppliers spend evaluated on environmental criteria	33%	68%	-
Number of suppliers engaged on DEI matters*	1,432 (30.8% of all active suppliers)	1,608 (34.7% of all active suppliers)	12.2%
Number of suppliers evaluated on DEI criteria	770 (16.7% of all active suppliers)	972 (21.0% of all active suppliers)	26.2%
% of suppliers spend evaluated on DEI criteria	35%	47%	-

*Number of suppliers up to 31st December.

Within our supplier engagement programme, we focus our efforts on those suppliers with the biggest impact on our supply chain emissions. We have a target to ensure that 93% of our supply chain emissions (including purchased goods and services, and capital goods) are covered by a Scope 1 and 2 science-based target approved by the Science Based Target initiative (SBTi) no later than 2025.

To support our own Science Based Targets (SBT), we introduced a new Sustainability Schedule in supplier contracts. We request that our suppliers develop and implement a plan to reduce carbon emissions and set their own SBT covering Scope 1 and 2 aligned with limiting temperature rise to 1.5ºC within two years.

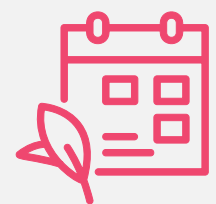## 40% of our Scope 3 emissions are with suppliers that have already set a Science Based Target

Supply chain emissions covered by an approved SBT

40.2%

Colt Group suppliers that have committed to an SBT (by % of emissions)

4.1%

Colt Group suppliers that have signed a Sustainability Schedule with Colt Group and are committed to having an SBT by 2025 (by % of emissions)

0.9%

Collaborating across our industry

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Colt has been involved in a Scope 3 emissions workstream through the Global Enabling Sustainability Initiative (**GeSI**), the leading cross-industry sustainability initiative to create digital solutions for society's most pressing challenges. In conjunction with the International Telecommunications Union (ITU) and **GSMA**, GeSI and its members have developed new guidance specifically for the telecommunications sector on reporting Scope 3 emissions produced by the suppliers. The **Scope 3 Guidance for telecommunication operators** provides an extensive understanding of categories for Scope 3 evaluation and establishes guiding principles for telecommunications operators to allocate, calculate and report the emissions in their supply chain.
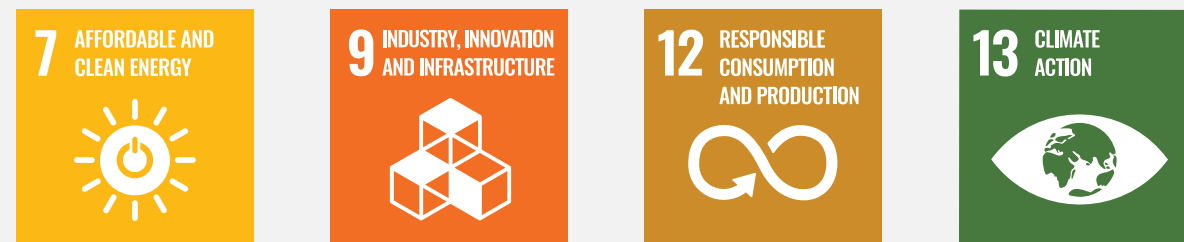
Strategies for
a greener future

Strategies for a greener future

We are committed to minimising the environmental impact of our operations as a fundamental aspect of our business model and an integral factor in our decision-making, from how we construct and run our data centres, design and deliver our products and services, collaborate with our suppliers and manage our impact on the local environment.

The Colt Environmental Sustainability Commitment and the DCS Environmental Sustainability Policy set out our environmental approach, which includes our commitment to environmental improvements that foster a sustainable future and lead to social improvements in the communities where we do business.

We set the highest standards for our environmental performance, and we are proud of the care we take in how we operate in local communities.

New India-Gurgaon office achieved LEED Gold certification

Colt

Our newly fitted-out Colt India-Gurgaon office has achieved LEED Gold certification, the first office in the Colt portfolio to achieve this certification. It recognises our efforts in various areas, such as energy efficiency, water conservation, indoor air quality, and the use of sustainable materials.

LEED certification signifies a significant milestone in our dedication to creating spaces that are not only efficient and eco-friendly but also healthy and comfortable for occupants.

How we engage with industry bodies

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In 2023, Colt participated in various working groups aimed at discussing and addressing challenges related to environmental sustainability.

These included the Scope 3 emissions workstream, the Circularity working group in partnership with GeSI and the Circular Electronics Partnership (CEP), as well as the EcoVadis working group.
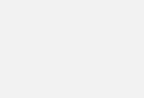
We are also a member of the European Data Centre Association (EUDCA) and TechUK.

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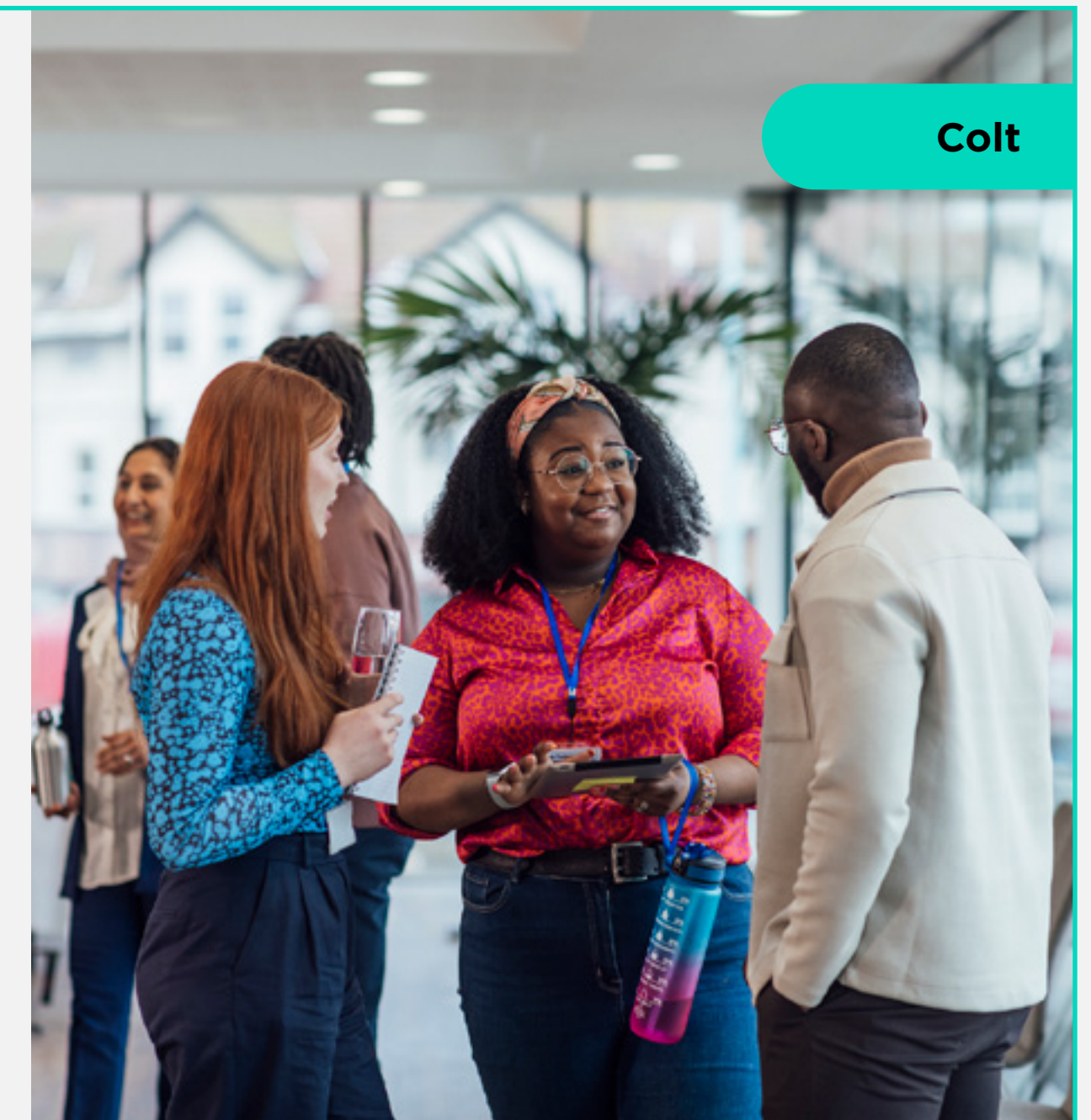
Our employees reinforce our Group commitment to protect and strengthen the environment through volunteer initiatives. Through our local Green Teams, employees participate in projects to address local environmental issues that they feel passionate about. In 2023, we ran over 28 Green Team projects across many of our sites.

Colt Green Team initiatives

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France: Colties got together at the Bois de Boulogne in Paris to volunteer with local charity Le Cri de la Terre to clean up the park.

Italy: The office adopted three families of bees, supporting local beekeepers and the protection of local biodiversity.

Spain: Colt provided support for a local charity, the FDI Foundation, reforesting an area in Madrid.

Austria: We carried out employee training organised by the University of Vienna's Waste and Resource Management Department to increase awareness on how to separate waste and reduce individual waste footprint.

India: We partnered with Say Trees Bangalore in a tree planting drive at Bangalore University, seeing 88 volunteers from our India operations plant 2,250 tree saplings.

India: Our Green Team introduced several initiatives in the workplace, including the installation of motion sensors and LED lights to reduce electricity consumption; the introduction of print-free Wednesdays and the use of recycled paper as the default option for all printing and copying; and the introduction of water carafes and cups made of rice to reduce single-use plastic consumption.

Conservation of the environment

Colt DCS

In line with our Net Zero Roadmap, Colt DCS is directing our community engagement initiatives towards environmental conservation. These initiatives contribute to long-term sustainability and societal wellbeing.

Our team in **India** participated in a tree planting initiative to increase local biodiversity around our Mumbai data centre site.

In **Japan**, Colt DCS participated in the Seika Town Clean Partner initiative in Keihanna together with NTT-AE and ALSOK. Volunteers were involved in weeding and cleaning public facilities such as roads and parks, resulting in 40kg of waste being collected.

In the **UK**, in Hayes, west London, 30 volunteers across Colt DCS and our project partners spent the day collecting waste and filled over 50 bags with rubbish in the Hillingdon borough.

Also in the **UK**, together with our construction partner ISG, Colt DCS attended and sponsored the Hayes Canal Festival. Organised by the Canal & River Trust, the festival raises awareness of the canal and the biodiversity it provides. It encourages more people to use and enjoy it in a variety of different ways, from watching wildlife to boating and walking. The free festival showcased the environment for the local community included live music and dancing organised by the local hospital radio station. There was also an organised litter-pick along the canal banks.

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Our journey to net zero

As a large company with global operations, we aim to lead by example when collaborating with our suppliers, partners, customers and communities to lower our carbon footprint and improve our positive impact on the environment. We have worked with the Science Based Targets initiative, the leading global initiative that promotes best practice in setting targets for emissions reduction, in developing and setting formal targets for both the near term and the long term.

In 2023, the SBTi approved our near- and long-term targets, in accordance with the SBTi Net Zero Standard

Main initiatives to help achieve Colt Group's net zero targets

- Achieve 75% renewable electricity procurement (Scope 2) for all sites globally by 2023, and 100% by 2030.

- Transition to more sustainable fuels and reduce emissions from refrigerant leakages by improving detection systems and transitioning to low GWP refrigerants.

- Reduce indirect emissions by finding alternatives to travel and encourage colleagues to choose better travel options for the environment. We have set an internal cost of carbon of 11 GBP per tonne of CO2e and have offset some of our business travel emissions by investing in carbon removal technology. We plan to continue to invest in internal decarbonisation projects.

- Decarbonise the in-house fleet through electrification and commit to a 75% pure electric fleet by 2030, with an interim target of 38% by 2025.

- Engage with our top suppliers in terms of emissions (93% supply chain emissions) to request they align to a Scope 1 and 2, 1.5-degree Science Based Target by 2025.

- Engage the business to ensure ESG by Design is embedded throughout everything we do and to better understand the environmental impact of Colt's investments.

- Invest the funds acquired from the internal travel carbon tax in high quality carbon removals such as biochar.

- We are in the exploration phase of applying a monetary value to carbon across our business operations. The shadow price will demonstrate the sustainability impact of Colt's business decisions and investment strategy as part of our ESG by Design strategic focus.

- Six Colt DCS sites working towards **TRUE** Zero Waste certification.

Colt Group approved SBTs

Near-term target

Scope 1 and 2:

-47% absolute reduction by 2030 from a 2019 baseline (1.5°C aligned)

Scope 3:

-28% absolute reduction by 2030 from a 2019 baseline (well-below 2°C)

Long-term net zero target

Scope 1, 2 and 3:

-90% absolute reduction by 2045 from a 2019 baseline

Data-driven carbon strategy

Our approach to emissions reduction is underpinned by our environmental policies, which affirm our key commitment to reach net zero GHG emissions by 2045. We are focusing our efforts on several net zero programmes across our businesses, such as sustainable design, greening our fleet, energy management and supply chain decarbonisation.

In 2023, our overall carbon footprint was 419,529 tonnes of CO_2e, a reduction of 34.4% in emissions compared to our baseline year 2019. This is a reduction of 6.1% compared to the year prior. As part of our carbon roadmap, we continue to focus on the decarbonisation of our value chain. In 2023, we have increased the percentage of Scope 2 renewable power coverage globally by 3.7%, and have worked on increasing the accuracy of emissions data related to our supply chain by incorporating more supplier data to replace some spend-based data.
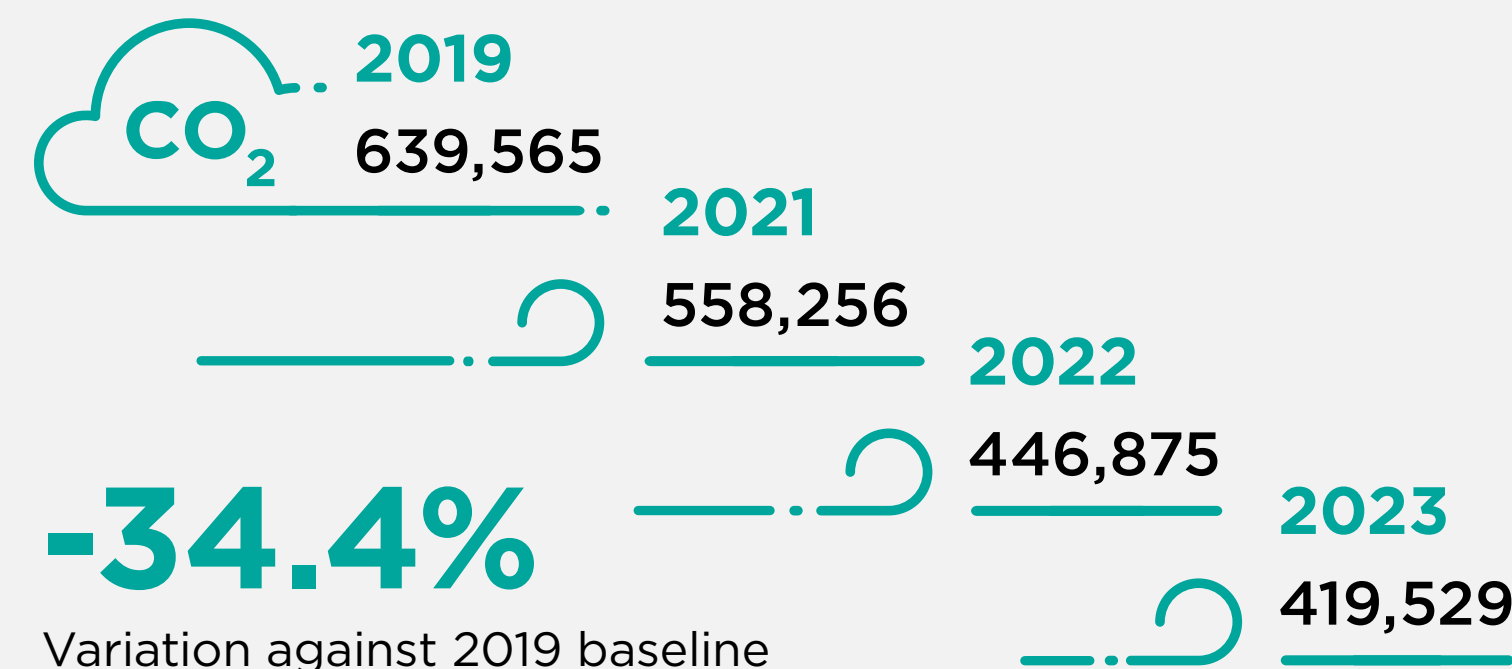
In 2023, our overall carbon emissions decreased by 34.4% from our 2019 baseline

In 2023, Colt Group GHG emission calculations have been verified following the ISO 14064 standard
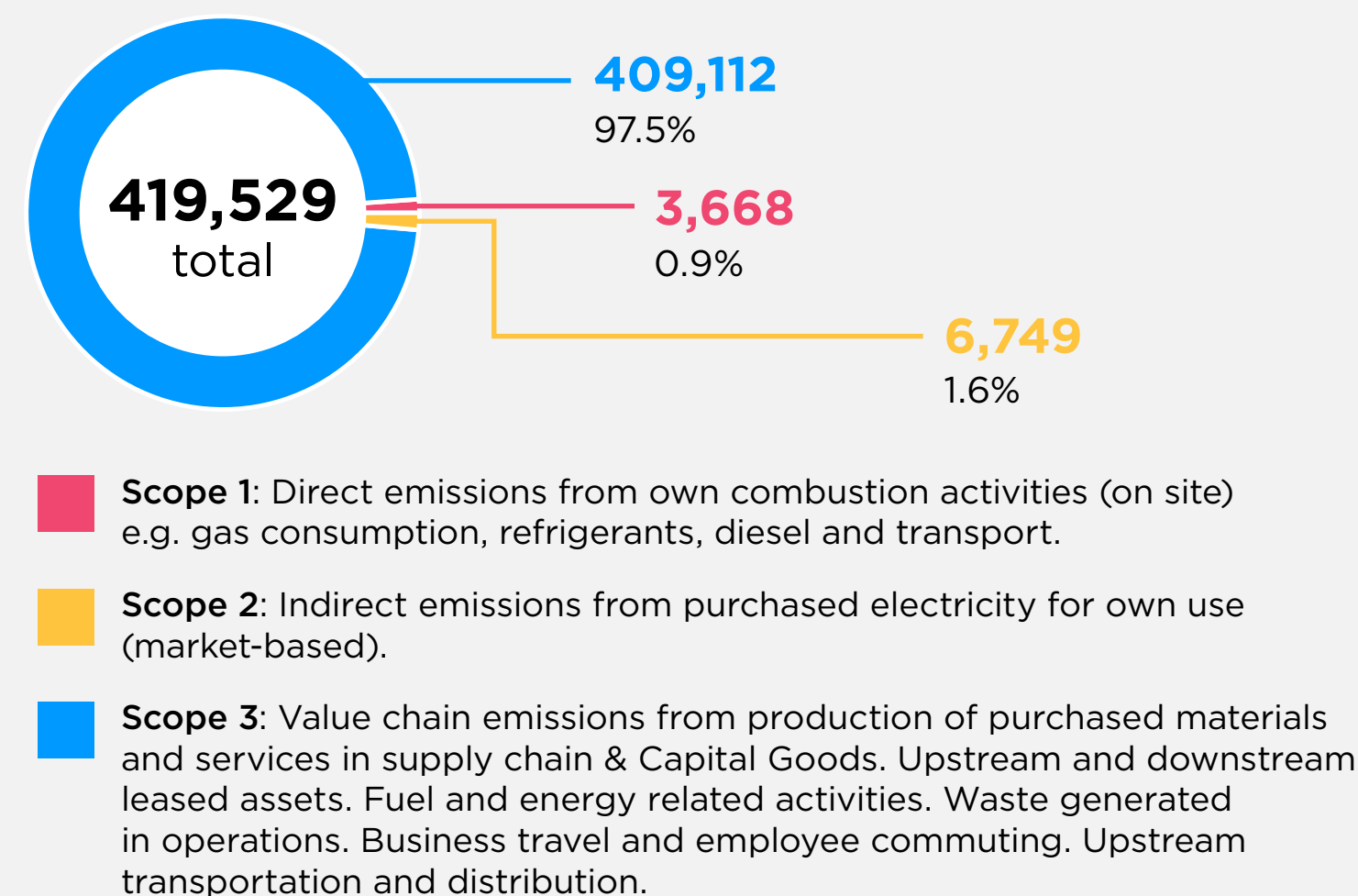
Colt Group GHG emissions in metric tonnes CO_2e*	2019 (base year)	2021	2022	2023	Variation against 2019 baseline	Variation against 2022
Gross direct (Scope 1) GHG emissions in metric tons of CO_2e	4,459	3,259	2,948	3,668	-17.7%	24.4%
Gross market-based indirect (Scope 2) GHG emissions in metric tons of CO_2e	32,146	10,260	10,499	6,749	-79.0%	-35.7%
Gross direct and indirect (Scope 1+2) GHG emissions in metric tons of CO_2e (market-based)	36,605	13,519	13,448	10,417	-71.5%	-22.5%
Gross indirect (Scope 3) emissions in metric tons of CO_2e (market-based)	602,960	544,737	433,427	409,112	-32.1%	-5.6%
Total emissions in metric tons of CO_2e (market-based)	639,565	558,256	446,875	419,529	-34.4%	-6.1%

*The report table includes 3 years of data (2021, 2022, 2023) with baseline 2019.
We aim to have the most accurate understanding of our impact on the environment. We are continually improving the management and measurement of Colt Group environmental data. As a result of this, we have restated some 2022 GHG emissions figures. For more details about the recalculations and the Colt Group GHG emissions methodology, please see appendix 'Greenhouse gasses calculation methodology'.

Colt Group GHG emissions (market-based) (tCO2e)

CO_2

2019
639,565

2021
558,256

2022
446,875

2023
419,529

-34.4%
Variation against 2019 baseline

2023 Colt Group GHG emissions (tCO2e)

419,529 total

409,112 97.5%

3,668 0.9%

6,749 1.6%

■ **Scope 1**: Direct emissions from own combustion activities (on site) e.g. gas consumption, refrigerants, diesel and transport.

■ **Scope 2**: Indirect emissions from purchased electricity for own use (market-based).

■ **Scope 3**: Value chain emissions from production of purchased materials and services in supply chain & Capital Goods. Upstream and downstream leased assets. Fuel and energy related activities. Waste generated in operations. Business travel and employee commuting. Upstream transportation and distribution.
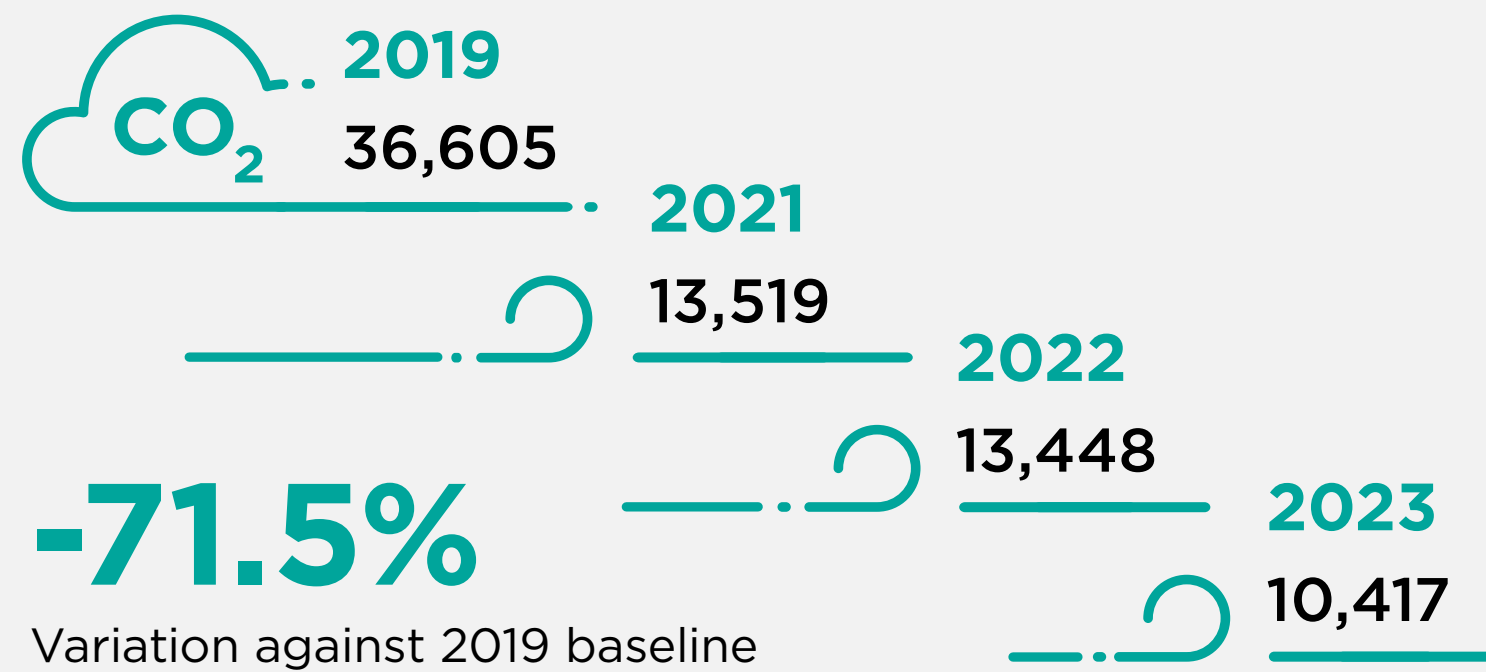
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Scope 1 & 2 GHG emissions

In 2023, Colt Group's Scope 1 and Scope 2 emissions amounted to 10,417 tonnes of tCO2e, representing a reduction of 71.5% compared to the 2019 base year. This is a reduction of 22.5% compared to last year.
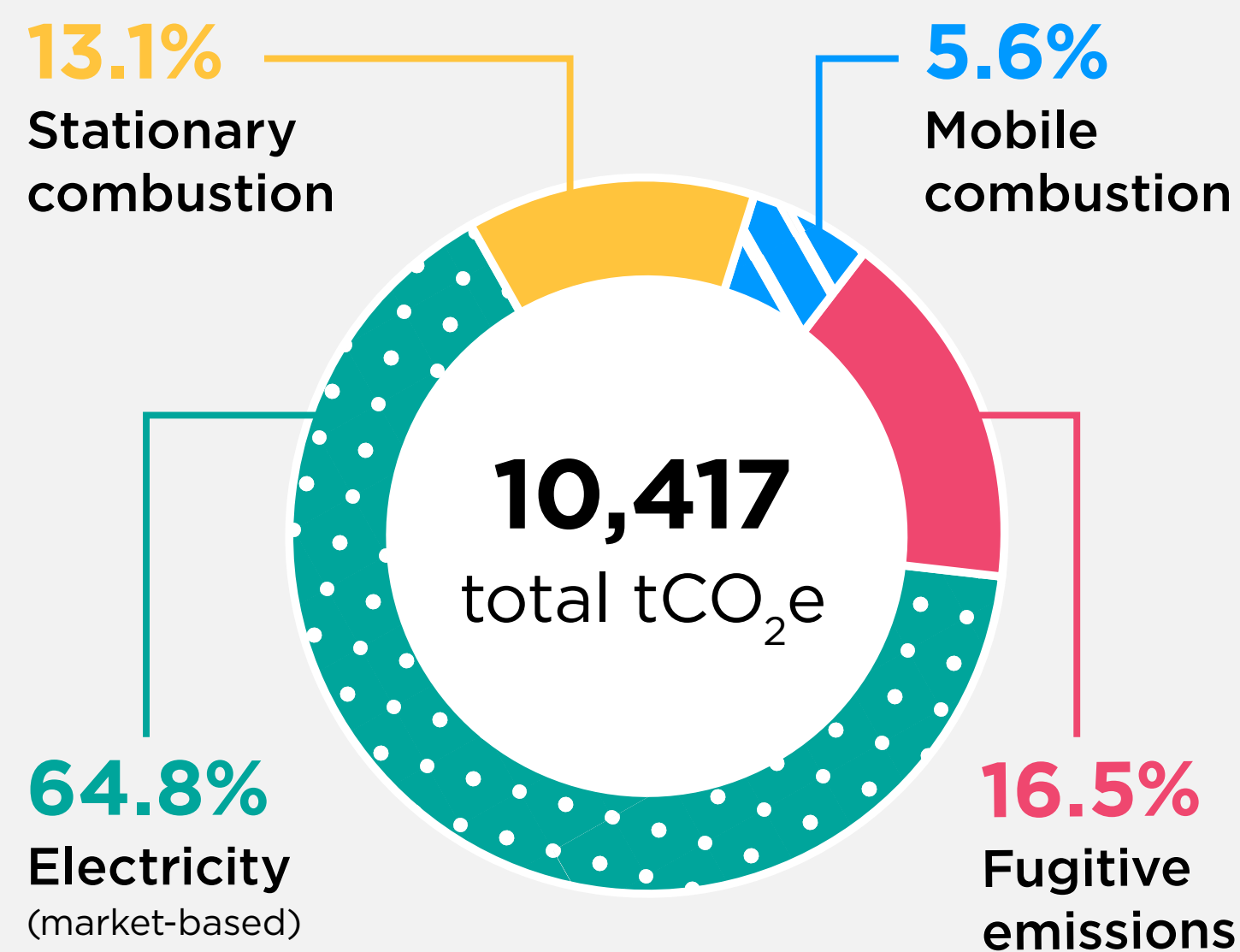
In late 2023, we increased the purchase of renewable electricity at one of our data centres in Japan. At Colt we completed a multi-year programme to remove legacy equipment developed in the 1990s, which was very energy intensive. These initiatives have facilitated the reduction of our Scope 2 emissions.

Compared to the previous year, we saw an increase (24.4%) in Scope 1. This is mainly due to the increase in fuel consumption in some of our data centres related to the testing of new back-up generators. We have seen an increase in fugitive emissions due to the improvement of the available data. Scope 1 emissions account for 1% of Colt Group's global emissions.

Colt Group GHG Scope 1 & Scope 2 (market-based) (tCO2e)

CO_2

2019
36,605

2021
13,519

2022
13,448

2023
10,417

-71.5%
Variation against 2019 baseline

2023 Colt Group Scope 1 & Scope 2 categories (market-based)

13.1%
Stationary combustion

5.6%
Mobile combustion

10,417
total tCO$_2$e

64.8%
Electricity
(market-based)

16.5%
Fugitive emissions

Scope 3 GHG emissions

Colt Group Scope 3 emissions totalled 409,112 tonnes of CO_2e. This represents a reduction of 5.6% compared to 2022.

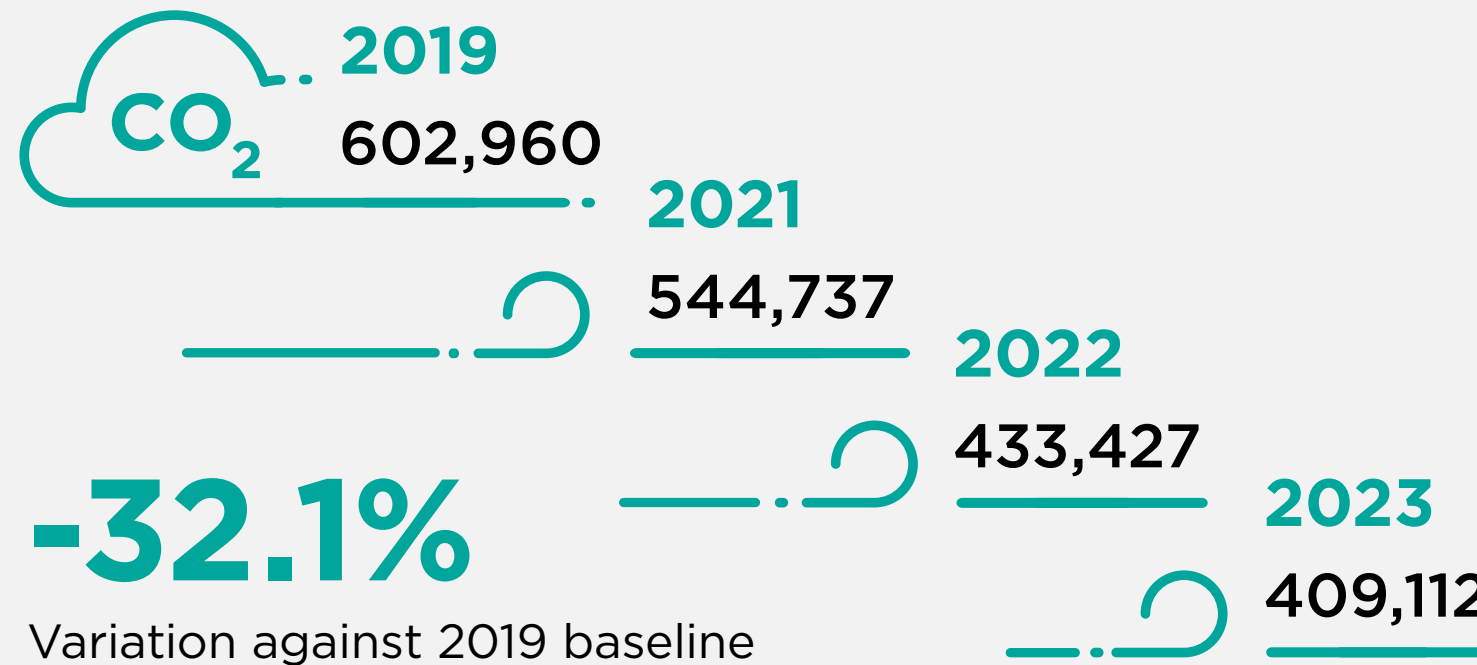## Our Scope 3 emissions in 2023 made up 97.5% of our overall emissions

While monitoring and managing Scope 3 emissions is not easy, we do have influence and seek to use it to its full potential. The majority of Scope 3 emissions are related to our supply chain (72.3%). Our aim is to actively engage with our suppliers that represent 93% of our supply chain emissions, requesting that they align to an approved Scope 1 and 2, 1.5-degree Science Based Target by 2025.

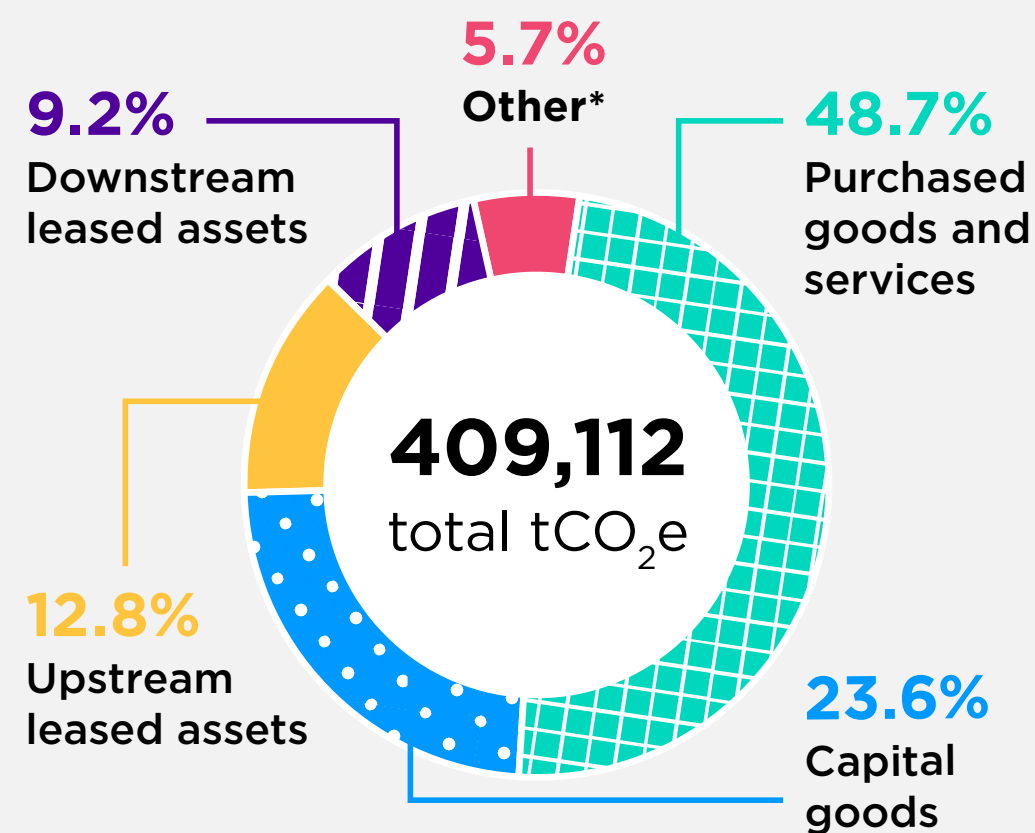(see **Collaboration across our value chain**)

In 2023, we continued to improve the carbon footprint calculation methodology related to Purchased Goods and Services (PG&S) and Capital Goods categories. We included supplier-specific emissions for 70 Colt Group suppliers, based on publicly available and externally verified GHG emissions data. This represents an increase of 438% compared to last year. We have updated the database we use for spend-based data so that we are able to use the most up-to-date information and can incorporate specific emission factors by country.

The updates in our methodology have led to enhanced accuracy in calculating PG&S and Capital Goods, complementing our engagement with upstream value chain partners to drive positive impacts on our Scope 3 emission reduction.

Colt Group Scope 3 GHG emissions (tCO2e)

CO₂ · **2019**
602,960

2021
544,737

2022
433,427

-32.1%
Variation against 2019 baseline

2023
409,112

2023 Colt Group Scope 3 GHG emissions

5.7%
Other*

9.2%
Downstream leased assets

48.7%
Purchased goods and services

409,112
total tCO₂e

12.8%
Upstream leased assets

23.6%
Capital goods

*Other includes: Fuel and energy related activities (FERA);
Waste generated in operations, Business travel and employee commuting.

We work with our suppliers to help them set Scope 1 and 2 Science Based Targets

We have seen a 12.8% reduction in the emissions related to Downstream Leased Assets due to the increase in renewable electricity procurement covering Colt DCS customers' electricity consumption. Upstream Leased Assets is another relevant Colt Group Scope 3 category. In 2023, we saw an increase in the emissions related to this category compared to 2022 (48.7%). This is due to an update in the equipment power assumptions to improve the accuracy of the report.

Working with DHL to cut CO2 emissions

Colt

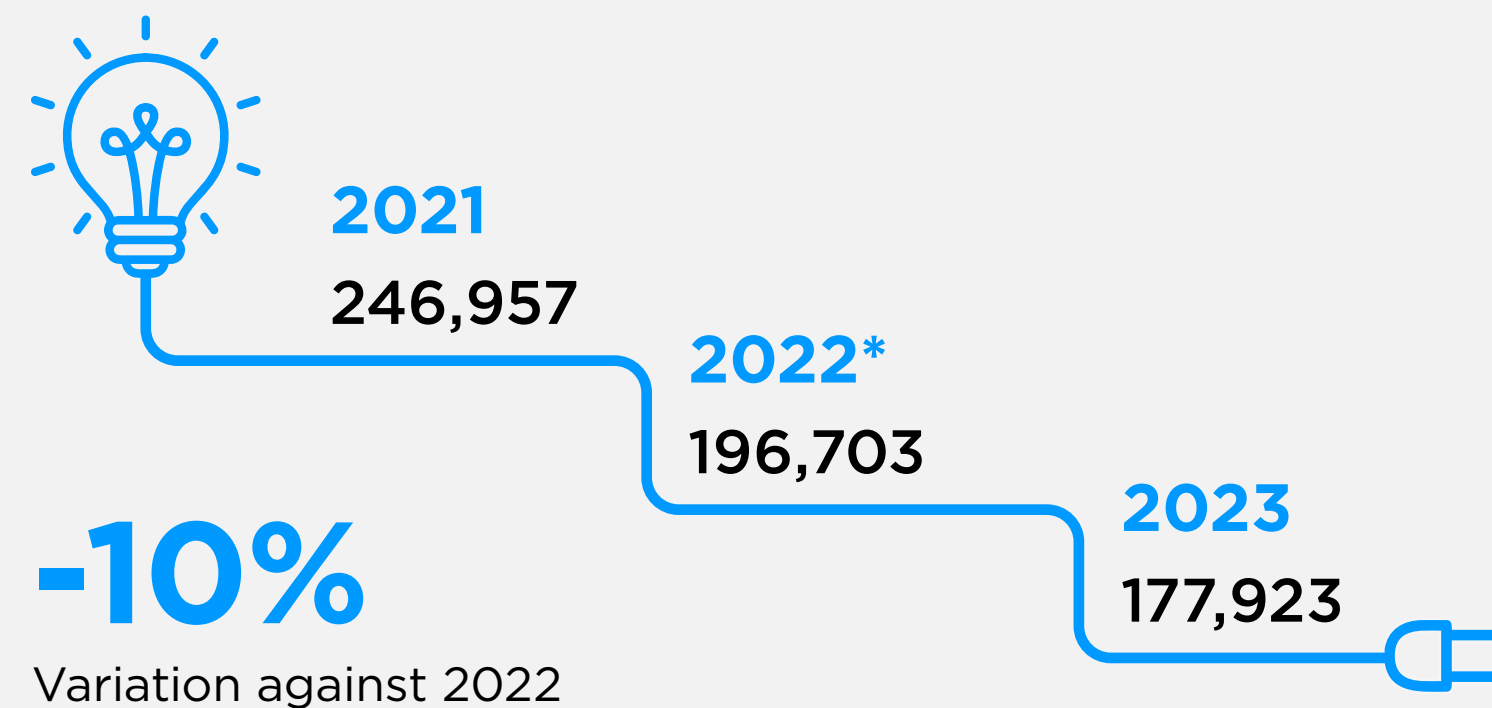In the 12 years we have been working with DHL, we have consistently strived to optimise operations. We have quarterly business reviews to examine where savings can be made, based on country-level data that is cross-referenced with DHL centres. We are now including the CO2 footprint of all the journeys DHL makes on our behalf. This data enables us to be smarter about how we use DHL services, in turn reducing our emissions.
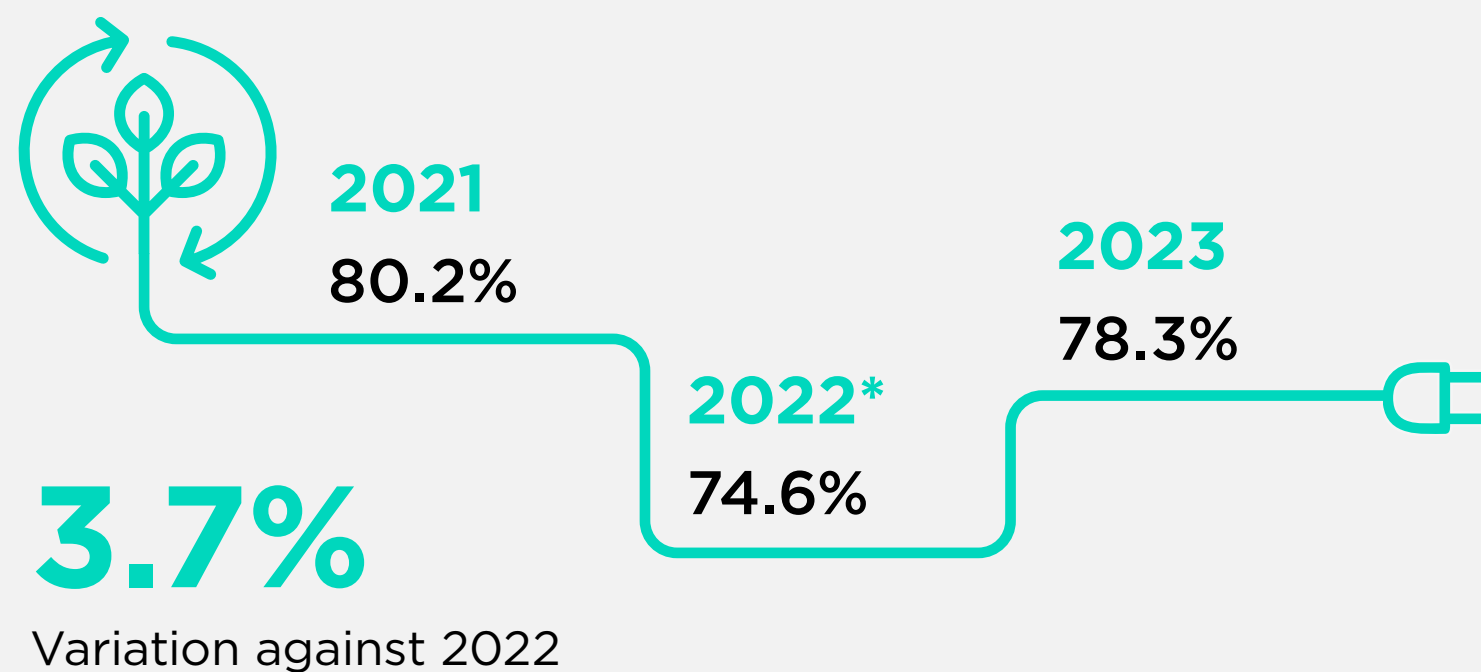
Energy efficiency

Our net zero roadmap focuses on facilitating a shift towards a sustainable energy future. Our Group target is to procure 100% Scope 2 renewable power by 2030 globally.

Total Group electricity consumption (MWh)

2021
246,957

2022*
196,703

2023
177,923

-10%
Variation against 2022

Renewable electricity

2021
80.2%

2022*
74.6%

2023
78.3%

3.7%
Variation against 2022

*Restated figure due to a correction of an error in the calculation methodology.

Colt Group electricity consumption by country (%)	2023	Variation against 2022
Japan	26%	0%
Germany	20%	-15%
United Kingdom	23%	-9%
France	15%	-13%
Spain	4%	-8%
Italy	3%	-13%
India	2%	-6%
Rest of Colt*	7%	-19%

*Includes: Austria, Belgium, China, Denmark, Hong Kong, Ireland, Netherlands, Portugal, Romania, Singapore Sweden, Switzerland & US.

In 2023, 78.3% of the Scope 2 electricity we procure at our sites globally is renewable through the use of renewable energy certificates

We continue to invest in upgrading our existing facilities and replacing equipment to drive down energy use and improve the Power Utilisation Efficiency (PUE) in our data centres. In France, Colt DCS aligned its data centre to the ISO 50001 Energy Management standard and the European Code of Conduct on Data Centre Energy Efficiency. Where possible, we are installing solar panels on our data centres.

100% of the Scope 2 electricity we procure at our sites in the UK and Europe is renewable through the use of renewable energy certificates

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Replacing old technology to reduce power usage

Colt

During 2023, we finished the four-year process of removing almost all the TDM switches, and their supporting SDH backbones, from our network. This is an important milestone for us on our journey towards network modernisation and enhanced sustainability.

We've successfully removed 130,000 legacy circuits from our network. This is 1990s technology that is very power hungry: power reduction was a significant part of the business case for this major change.

The direct result was a 14.6 GWh reduction in power usage in 2023.

More information can be found on **our website**.

Opening our Mumbai data centre

Colt DCS

In 2023, Colt DCS completed the first phase development of our new hyperscale data centre in Navi, Mumbai. It is one of the largest data centres in our current portfolio. When it is in full operation, this will be a 120MW IT capacity data centre on a 62,000 square metre site.

We have built it to serve the growing demand of India's mass cloud migration, mobile internet and the rapid digitalisation of industries. Our commitment to reduce emissions is reflected in the design and development. At Colt DCS, we strive to have all our data centres running on renewable electricity by 2030. Our Mumbai data centre will be running on 100% renewable electricity. The data centre will also be looking into on-site renewable energy generation in 2024.

Additionally, we're striving to reduce our waste generation in line with our Global Zero Waste to Landfill policy. Our collection and segregation processes enable us to conserve resources, and reuse and recycle materials. Besides minimising our environmental impact, this approach enables us to streamline operations, cut inefficiencies and cut costs by re-purposing waste.

The data centre achieved a Platinum IGBC Green Building Certification. The IGBC – Green Data Centre, developed by the India Green Building Council, is a widely used green building rating system in India. The Platinum rating is an indicator of a building designed with overall sustainability and occupant wellbeing in mind through design, construction and operations. This is a highly efficient centre, with a designed Power Usage Effectiveness of less than 1.40, comfortably below the data centre average.

More information about our Mumbai data centre can be found on the **Colt DCS website**.

Sustainable design

At Colt, the concept of ESG by Design runs throughout everything we do, the solutions we offer and the pioneering innovations we create.

This ethos informs our environmental risk management approach and our decision-making and decision-making, playing a crucial role in reducing our energy consumption across the products and services we deliver and the way we operate our business. Our products and services contribute to a more sustainable network and increase energy optimisation through enabling and supporting digital transformation through innovations such as SDN, NFV and AI.

Using alternatives to reduce our emissions

Colt

The Email Flow Reduction Initiative is a programme to reduce the number of emails we send. Sending an email with a large attachment can lead to the production of 50g of CO_2 emissions. With nearly 350 billion emails sent around the world every day, it soon adds up. The starting point was analysing how emails are being used, which leads to alternative suggestions, for which we have developed the Comms Channel Wizard.

It is still in beta testing and the results are encouraging, with 89% of the testers using alternative channels. We also developed an email etiquette infographic as a reminder of best practice. These seemingly small changes create big results. They also reinforce the ethos of constantly revising the environmental impact of everything we do.

New data centres with a sustainability focus

Colt DCS

In 2023, we started building two new hyperscale data centres in Hayes, west London, our third and fourth hyperscale data centres in London. Together, they will provide 57MW of IT power when they open in 2024. We also have planning permission to build a third data centre on the same site, with an additional 30MW.

The new data centres include a range of measures to reduce their environmental footprint, including procurement of 100% renewable electricity, on-site renewable energy generation, heat re-use opportunities and low Global Warming Potential refrigerants.

More information on our London Hayes site can be found on the **Colt DCS website**.

For Colt DCS, the design and build of new data centres provides the greatest opportunity to improve the environmental performance of our portfolio. We strive to align all our new data centres with the environmental sustainability requirements as outlined in our Global Reference Design (GRD) document.

We take pride in designing and operating sustainable and resilient data centres. We strive to achieve LEED Gold or equivalent in all future data centres.
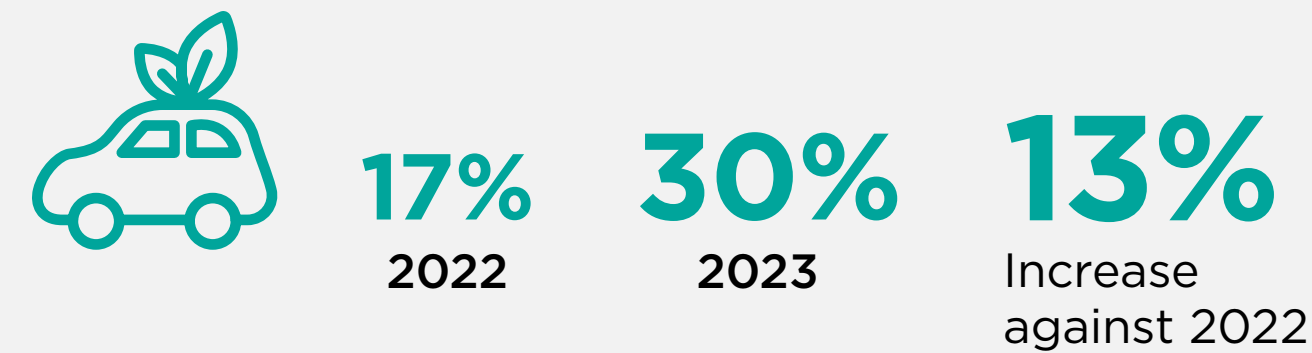
Our sites use renewable electricity where possible and we continue to optimise energy efficiency. The installation of on-site solar panels is intended to cover the electricity consumption in our offices, and we have a programme to install sufficient electric vehicle (EV) charging points at our sites.

To reduce our Scope 2 operational emissions, we continue to improve operational efficiency by transitioning to alternative cooling and fuel sources. We use efficient cooling systems and LED lighting with motion detection to minimise energy consumption.
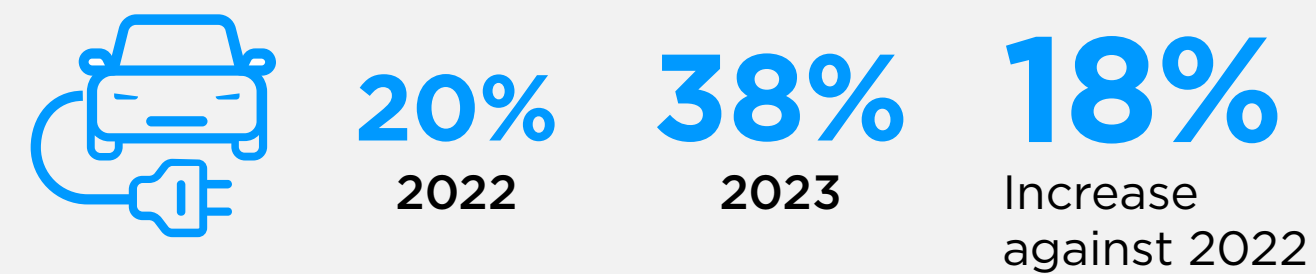
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Greening our fleet

Colt Group owned fleet

Battery Electric Vehicles (BEV)

17% 2022   **30%** 2023   **13%** Increase against 2022

Plug-in Hybrid Electric Vehicles (PHEVs)

20% 2022   **38%** 2023   **18%** Increase against 2022

We continue to upgrade our vehicle fleet to lower carbon vehicles. At the end of 2023, 30% of our vehicle fleet were full Battery Electric Vehicles (BEV) and a further 38% were Plug-in Hybrid Electric Vehicles (PHEVs).

In absolute terms, out of our 336 active cars, we have 101 BEVs and 128 PHEVs. Based on open orders for new vehicles, our projections are that by the end of 2024 our fleet will form 32% BEVs and 45% PHEVs.

This requires balance. While EVs are better environmentally over their lifetime, we do not want to needlessly accelerate the end of life of our fleet; this is the key reason we are phasing in EVs over time. We have now installed 40 charging stations with a total of 74 charging ports across our operations. We will continue the rollout of charging points in 2024 with a further five charging points and 10 charging ports already planned in Germany and Portugal.

At Colt DCS, we have electric vehicle charging points installed at five data centres across four countries. By the end of 2023, we had a total of 29 charging points installed across our sites. By electrifying our car fleet and installing EV charging points, we aim to support sustainable transport and reduce our emissions from mobile combustion. Looking ahead, we will continue to assess strategies to improve the infrastructure needed to decarbonise our operations.

Circular Economy

We are committed to reduce the generation of waste and, where possible, implement circular economy principles across our operations, in line with our Environmental and Zero Waste to Landfill policies.

In 2023 we implemented an Investment Recovery Procedure, which outlines how Colt deals with IT and network equipment that is at its end of life (EOL) and/or will no longer be used by the company, and the procedure for selecting investment recovery partners. This procedure supports Colt's overall ESG strategy and Environmental Policy, alongside complying with our Duty of Care for Waste Disposal. We've also worked to ensure the procedure aligns with our sustainability targets and that we can drive sustainable practices.

The Investment Recovery Procedure ensures electronic equipment is dealt with in an environmentally sensitive and financially sensible way: extending life where possible and ensuring safe, considerate disposal. The procedure aims to link important teams such as IT, Network and Supply Chain in coordinating pick-ups of devices to reduce trips and therefore emissions. It also ensures that by using the correct channels, we receive adequate data for reporting.

Investment recovery procedures*	2021	2022	2023	Variation against 2022
Number of Colt quality second hand equipment	6,686	8,132	6,183	-24.0%
Number of Colt extended life equipment via reuse	39,878	40,755	42,670	4.7%

*2021 and 2022 figures have been updated due to improvement of the quality of the reports.

Mining decommissioned equipment for reuse and recycling

Colt

We have been working with asset recovery partners to reuse and recycle equipment. This follows a pilot project with metals recycling company Urban Miners in Sweden to analyse decommissioned SDH equipment and understand which materials could be reused or recycled. An impressive 99.4% was either recyclable or reusable, amounting to 8.7 metric tonnes. It also enabled CO_2 savings of 19 tonnes and avoided the mining of virgin materials of approximately 103 tonnes*. Due to its success, the pilot was extended to sites in Germany in 2023 and will be extended to other European countries in 2024.

Through our overall equipment end of life initiatives in 2023 in Sweden and Germany, the mining of an estimated 493.8 tonnes of virgin materials* was avoided. We will continue to grow the initiatives into 2024 with projects planned at multiple sites in France, Germany, Ireland, Italy, Spain, Switzerland and the UK.

Our priority is to find local suppliers to avoid the equipment being transported long distances, removing both the environmental and financial cost of moving the hardware.

*This figure assumes processes are 100% efficient, therefore there is an expected margin of error of approximately 10% to be considered.

Investing carbon tax from business travel into innovative carbon capture

Colt

At the end of 2023, we secured a small investment in a circular economy carbon capture project in Ireland which uses seaweed grown on the local fishermen's ropes to absorb CO_2 that is then turned into biochar. Biochar, which traps carbon for hundreds of years and retains the nutrients of the biomass it was produced from, is then given to local farmers to improve soil quality.
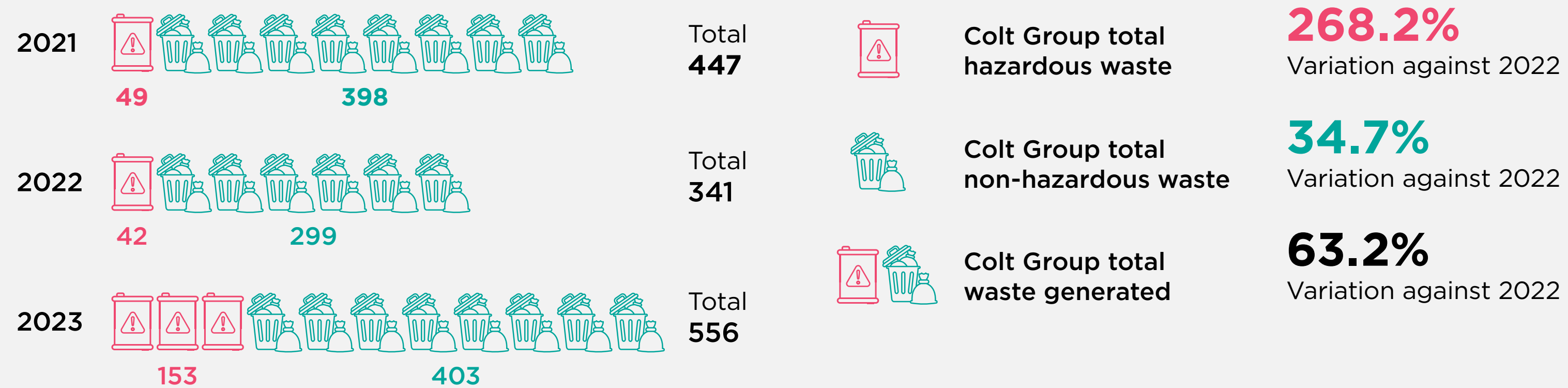
We used funds raised as a result of an internal carbon tax on business travel to invest in the installation of ten 100 metre ropes in the seaweed cultivation areas. These will capture about 1.8 tonnes of CO_2 to be turned into 500kg of biochar.

We have an ambitious target of sending zero waste to landfill, targeting a 90% reduction. We aim to reuse, resell or recycle all end of life equipment. To reduce waste generation, we aim to go beyond waste diversion as we are working through our design, development and operational stages. We work closely with our suppliers, general contractors and customers to measure and reduce waste.

We are continuously working to increase waste data coverage to improve our zero waste to landfill strategy. In 2023, we have seen an increase in the amount of waste generated compared to 2022. This is mainly due to the fact that for the first time we have access to the amount of network waste data and the total waste generated in two of our data centres. This has an impact on the percentage of waste diverted from landfill.
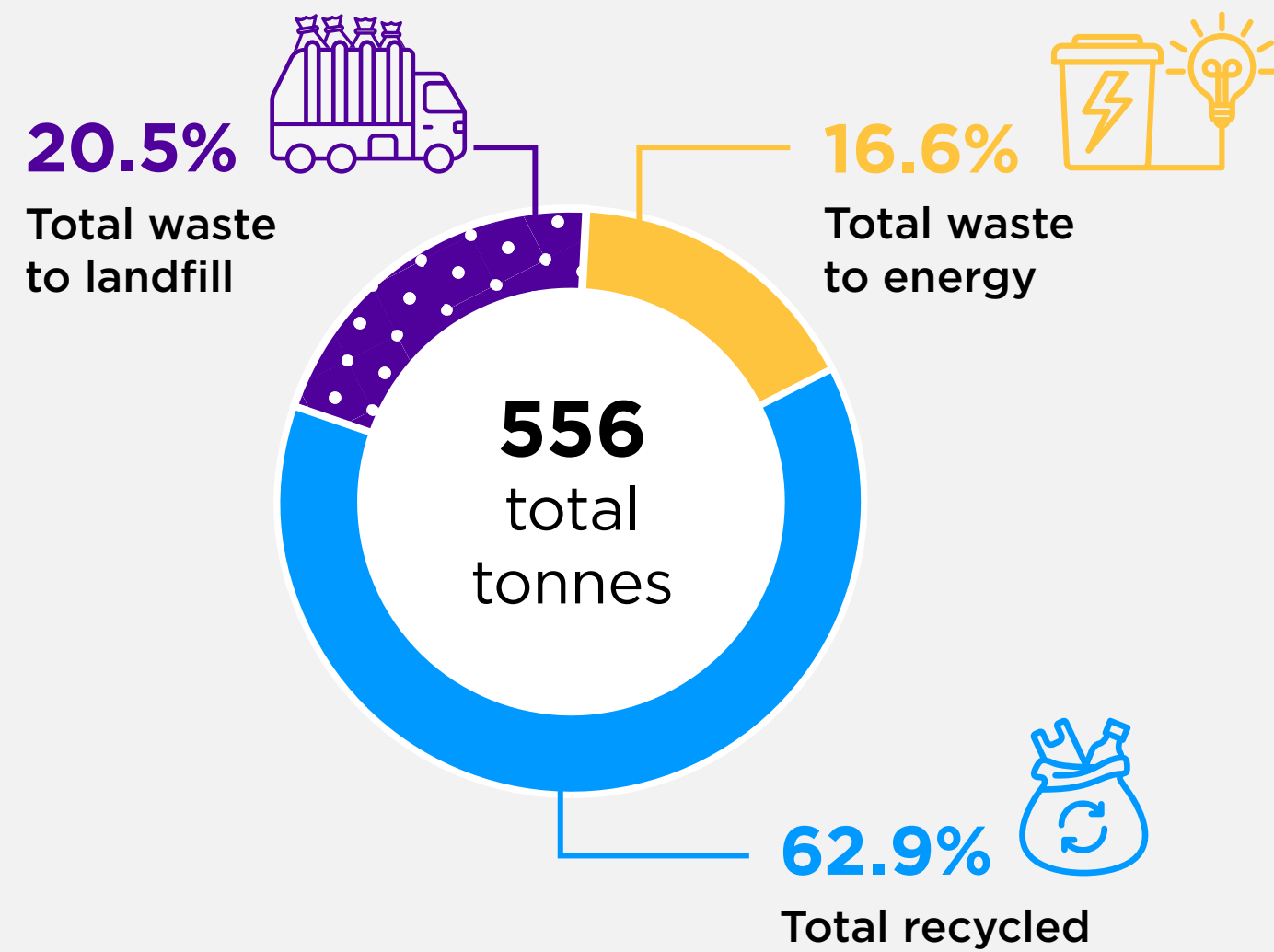
Colt Group total waste generated (tonnes)*

2021   49   398   Total **447**

2022   42   299   Total **341**

2023   153   403   Total **556**

Colt Group total
hazardous waste
268.2%
Variation against 2022

Colt Group total
non-hazardous waste
34.7%
Variation against 2022

Colt Group total
waste generated
63.2%
Variation against 2022

*Hazardous waste includes: Batteries, Fluorescents and WEEE, Metal, Cables, Network Waste
Non-Hazardous waste includes Cardboard packaging, MetalPlastic packaging, Garden Waste, Food waste, Glass, biodegradable kitchen and canteen waste, Organic waste , Wet waste and others.

In 2023, waste data included the majority of Colt Group offices and sites worldwide. For those sites with no waste data available, this has been estimated following GHG protocol best practices.
We are also including end of life equipment recycled by one of Colt's major investment recovery partners. We exclude the network waste of refurbished equipment from those partners, which amounted to 0.8 tonnes in 2023.
At Colt, we have expanded this programme in order to onboard more partners and to centralise the collection of the Waste from Electrical and Electronic Equipment (WEEE) waste data (termed as network waste) which resulted in an increase of waste generated of 63.2 % when compared to 2022. In 2023 we also collected for the first time waste data in two of our data centres.
We will continue working on the standardisation and collection of all waste data across Colt Group, specifically with regards to network waste.

2023 Colt Group waste

20.5%
Total waste to landfill

16.6%
Total waste to energy

556 total tonnes

62.9%
Total recycled

Colt Group total waste generated (tonnes)*	2021	2022	2023	Variation against 2022
Total recycled	**226**	180	349	93.6%
Total waste to landfill	**9**	21	114	448.3%
Total waste to energy	**212**	139	92	-33.7%

TRUE Zero Waste Certification at our data centres

Colt DCS

At Colt DCS, we follow the guidelines of the TRUE Zero Waste to Landfill Certification to become more resource efficient. We currently have six sites on the road to full certification.

Our Zero Waste to Landfill Policy outlines the guidelines on how to manage the waste generated by our activities. In 2022, the policy was implemented across the DCS global operations and includes requirements for our employees, contractors and supply chain partners. In 2024, Colt DCS is planning to conduct site-level assessments to identify opportunities to gain TRUE Zero Waste Certification. Looking ahead, Colt will implement a similar zero waste to landfill policy, starting in Paris, Munich and London.

2023 Colt Group total waste generated (tonnes)	Recycled	Waste to landfill	Waste to energy
Hazardous	152	0	0
Non-hazardous	197	114	92

2023 Colt Group total waste generated	% recycled	% waste to landfill	% waste to energy
Non-hazardous	48.9%	28.3%	22.8%

In 2023, 100% of hazardous waste was recycled*

*100% of Colt Group's hazardous waste is being sent to a recycling plant to be recycled. There is a low percentage of the materials which cannot be recycled but are safely managed by the facility.

*Figures rounded to the nearest tone.

In 2023, waste data included the majority of Colt Group offices and sites worldwide. For those sites with no waste data available, this has been estimated following GHG protocol best practices.

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We will continue working on the standardisation and collection of all waste data across Colt Group, specifically with regards to network waste.

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Nature, biodiversity and water consumption

We actively manage how we interact with and impact the natural world and our local environment. We are committed to accelerating our efforts to protect and restore biodiversity areas throughout the design and operation of our products and services, and the construction and operation of our data centres.

At Colt DCS, we consider the impacts on biodiversity and ecology at the design stage of new projects and are committed to assessing all biodiversity impacts on our value chain in the next two years. We conduct regular feasibility studies, and are planning to develop a stand-alone biodiversity and nature strategy and implementation roadmap.

Colt DCS runs an active programme to beautify its sites. We are driving progress of biodiversity through our global network of sustainability champions across our offices and data centres. We also invested in several initiatives to create green spaces in and around our data centres to attract more wildlife.

There is a global increase in demand for water due to population growth, economic development and changing consumption patterns. At Colt Group, we are committed to reducing our water consumption and protecting access to water resources.

The data centres at Colt DCS are designed in line with our GRD requirements, and new data centres are built with rainwater harvesting systems, as well as water retention and irrigation systems.

Creating biodiversity net gain in our data centres

Colt DCS

The risks of climate change are further accelerating the decline of biodiversity loss, and the consequences of both crises will likely affect the health and livelihoods of billions of people worldwide. At Colt DCS, we strive to create and improve biodiversity by aligning our new data centres with design principles that have a biodiversity net gain. The UK Government defines Biodiversity Net Gain as "an approach to development that makes sure that habitats for wildlife are left in a measurably better state than they were before the development."

In 2023, we conducted a study to understand the application of the Defra Biodiversity Net Gain Metric 4.0 on two of our data centre sites: London Hayes and London North. On-site assessments, an ecological assessment and satellite imagery were used to map the habitat and perform the assessment. This has resulted in the identification of key design principles to maximise the opportunity for biodiversity net gain. These principles have been included in our Global Reference Design Document, which is used as the basis for the design of our new data centres.

Focusing on our people

colt

Focusing on our people

Our people and culture

Colt Group employees play an integral part in the success of our ESG strategy and enable us to achieve our vision.

As part of the acquisition of Lumen EMEA, we welcomed over 1000 people to the Group. A particular focus over the next year will be integrating the Colt and Lumen EMEA cultures to build our own 'One Colt' culture, supported by **our values**.

The culture journey started with the creation of an extensive onboarding programme, including a dedicated welcome area on our intranet, bite-size learning modules about both companies and a Manager Playbook formed specifically to support managers to lead their teams through change. We also offered a three-month voluntary Culture Buddy programme to allow Colties from Lumen to connect with their new colleagues. All this has been supported by an extensive listening strategy to understand the experiences of both new and existing employees, and these insights are being used to continuously shape the employee experience at Colt.

People Matters Survey

Colt Group

We gather feedback from our employees through our regular People Matters survey. Fostering a workplace culture where every individual feels heard and engaged is fundamental to our values, and our survey serves as a vital tool to gather the opinions of our employees.

This year, we achieved an impressive 89% and 88% participation rate for Colt and Colt DCS, which indicates our team's strong commitment to support improvements. Feedback scores across almost all areas improved including Career and Development, Strategy and Leadership, Sustainable Engagement and Wellbeing and Inclusion.

This feedback serves as a roadmap for our leadership teams, highlighting our successes and areas for improvement with the goal to make Colt a workplace where everyone is excited to come to work, feels supported and believes in what we are doing together.

The acquisition of Lumen EMEA increases the number of people employed by Colt Group by over 20.3%*
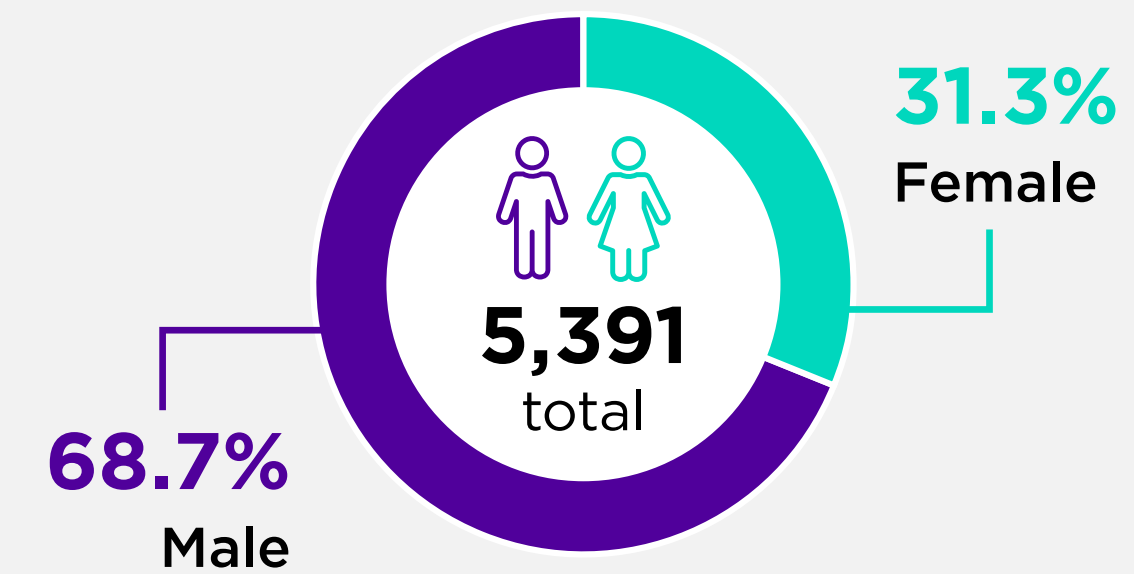
* Headcount as of 31st December.

Increase of people employed by Colt Group with the inclusion of new Colties from Lumen, by location

Colt Group locations	People employed by Colt Group in 2023	People employed by Colt Group in 2023, including new Colties from Lumen	% increase
France	275	323	14.9%
Germany	441	518	14.9%
India	1,929	1,931	0.1%
Italy	125	132	5.3%
Japan	357	357	0.0%
Netherlands	78	133	41.4%
Poland	1	198	99.5%
Spain	581	609	4.6%
United Kingdom	810	1,730	53.2%
Rest of Colt Group*	794	836	5.0%
Total	**5,391**	**6,767**	**20.3%**

*Rest of Colt Group includes: Austria, Belgium, China, Denmark, Hong Kong, Ireland, Luxembourg, Portugal, Romania, Singapore, Sweden, Switzerland, South Korea, Poland, Bulgaria, Greece, Turkey & US. Headcount as of 31st December.
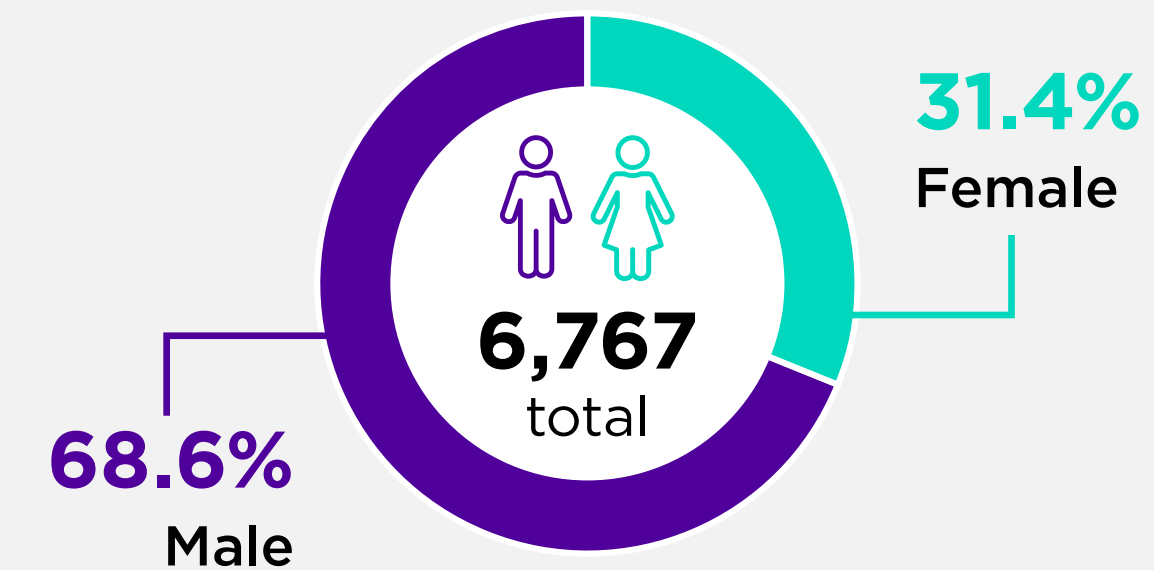
People employed by Colt Group data in Our People and Culture section refers to the following definition in line with our internal Headcount Sourcing Policy: number of people employed by Colt Group who are captured in our core HR system. This includes the following employment types: Employee, Apprentice, Graduate Rotational, Intern, Contractor Ongoing, Contract Trainee, Fixed Term Employee. Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy are excluded. "IReq contractors" are individuals who are although in effect working directly for Colt Group, aren't treated as employees, they are managed on a day-to-day basis by Colt Group management, are sourced by Colt Group's RPO provider, they are tracked in Colt Group Systems and are included in headcount reporting. Inactive workers – i.e. those on long term leave but still directly or indirectly employed by Colt Group are also included.
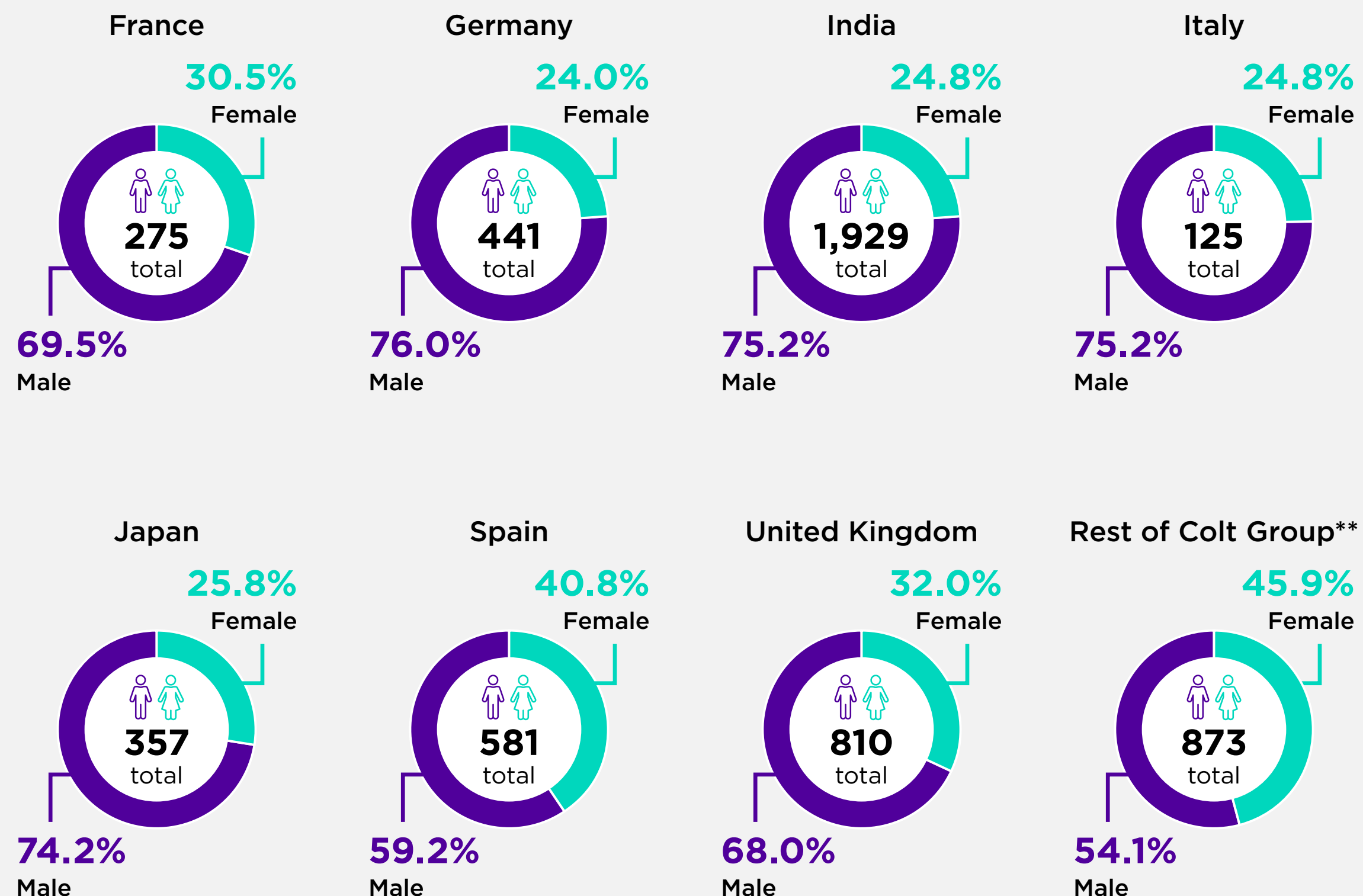
People employed by Colt Group in 2023, by gender**

31.3% Female

68.7% Male

5,391 total

Following integration of Lumen EMEA, overall females employed by Colt Group remains at over 31%

People employed by Colt Group 2023, including new Colties from Lumen, by gender**

31.4% Female

68.6% Male

6,767 total

**Headcount as of 31st December.

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People employed by Colt Group in 2023, by location and gender*

France
30.5% Female
275 total
69.5% Male

Germany
24.0% Female
441 total
76.0% Male

India
24.8% Female
1,929 total
75.2% Male

Italy
24.8% Female
125 total
75.2% Male

Japan
25.8% Female
357 total
74.2% Male

Spain
40.8% Female
581 total
59.2% Male

United Kingdom
32.0% Female
810 total
68.0% Male

Rest of Colt Group**
45.9% Female
873 total
54.1% Male

People employed by Colt Group in 2023, by location and compared to 2022

| Colt Group locations	People employed by Colt Group in 2022	People employed by Colt Group in 2023	% variation against 2022 of people employed by Colt Group	% females employed by Colt Group in 2023	% variation against 2022 of females employed by Colt Group
France	287	275	- 4.2%	30.5%	-4.5%
Germany	445	441	-0.9%	24.0%	-2.8%
India	1928	1929	0.1%	24.8%	0.6%
Italy	129	125	-3.1%	24.8%	0.0%
Japan	352	357	1.4%	25.8%	10.8%
Spain	592	581	-1.9%	40.8%	1.3%
United Kingdom	846	810	-4.3%	32.0%	4.9%
Rest of Colt Group**	882	873	-1.0%	45.9%	0.3%
Total	**5,461**	**5,391**	**-1.3%**	**31.3%**	**1.3%**

*Headcount as of 31st December.

People employed by Colt Group data in Our People and Culture section refers to the following definition in line with our internal Headcount Sourcing Policy: number of people employed by Colt Group who are captured in our core HR system. This includes the following employment types: Employee, Apprentice, Graduate Rotational, Intern, Contractor Ongoing, Contract Trainee, Fixed Term Employee. Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy are excluded. "IReq contractors" are individuals who are although in effect working directly for Colt Group, aren't treated as employees, they are managed on a day-to-day basis by Colt Group management, are sourced by Colt Group's RPO provider, they are tracked in Colt Group Systems and are included in headcount reporting. Inactive workers – i.e. those on long term leave but still directly or indirectly employed by Colt Group are also included.

**Rest of Colt Group includes: Austria, Belgium, China, Denmark, Hong Kong, Ireland, Luxembourg, Netherlands, Portugal, Romania, Singapore Sweden, Switzerland, South Korea, Poland & US (excluding new countries from acquired Lumen EMEA).

New Colties from Lumen are not included in the table above for YoY comparison.

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2023 Colt Group new hires by gender*

450 total
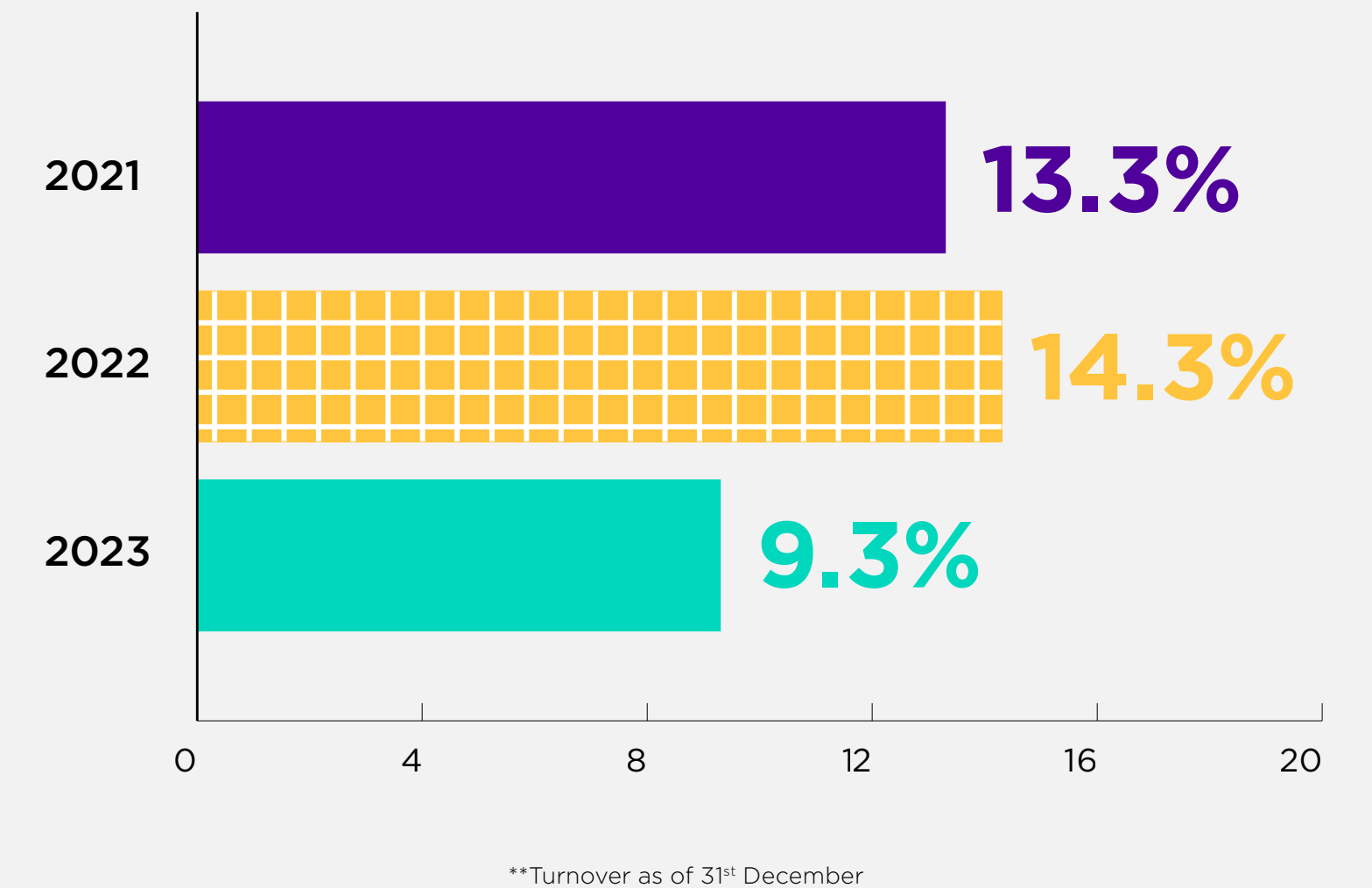
45.7% Female

54.3% Male
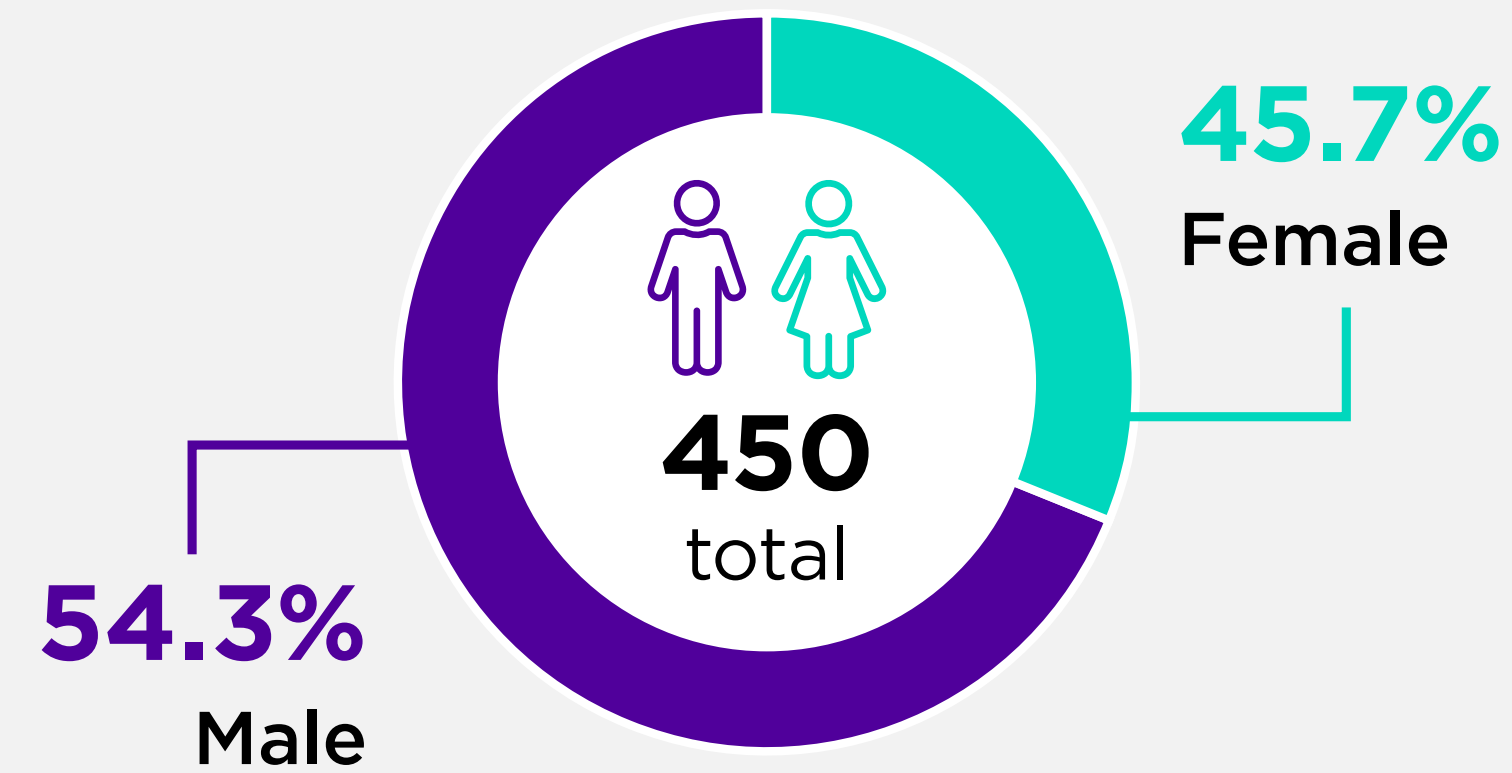
2023 Colt Group new hires by age*
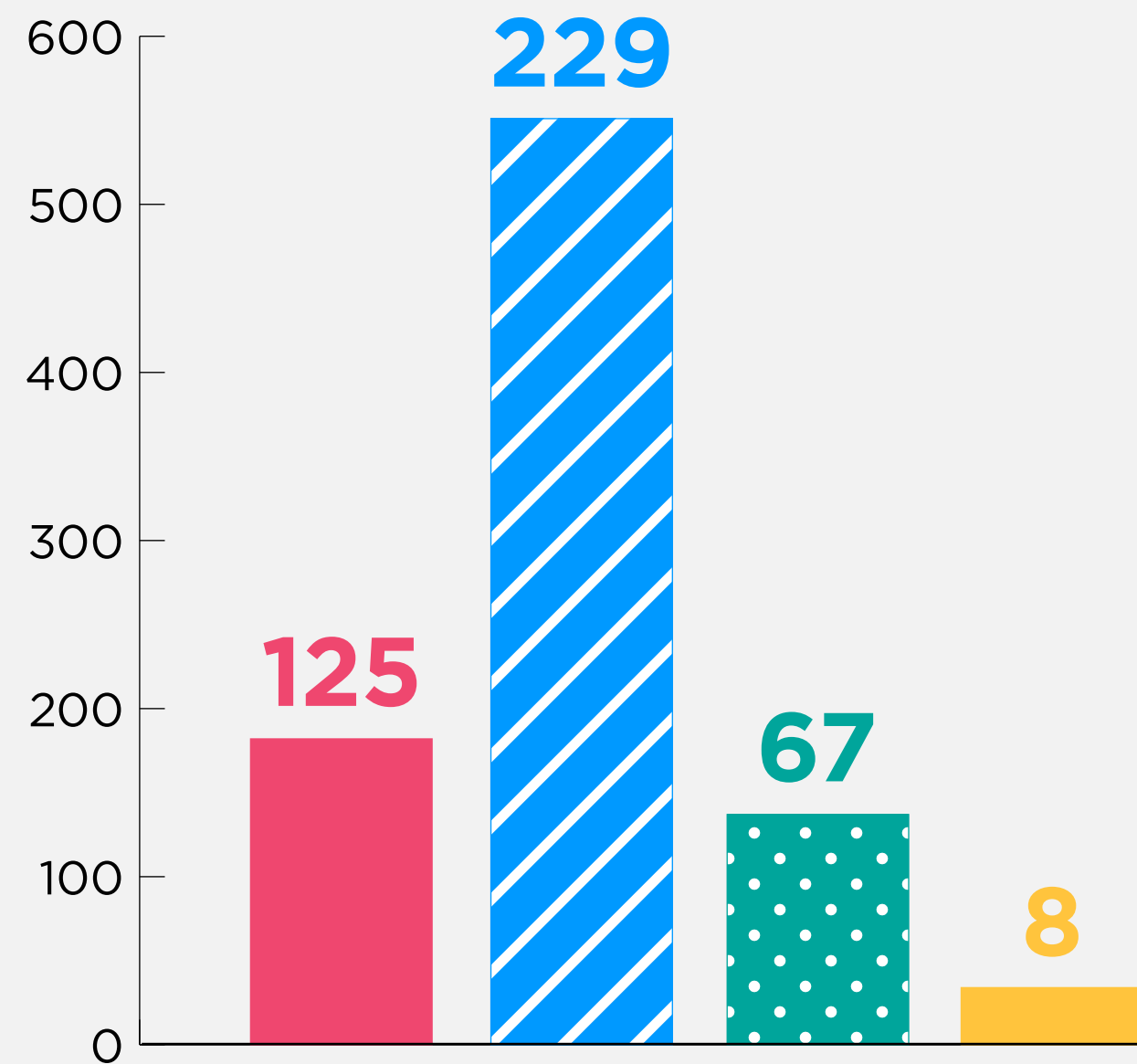
- ▮ Gen Z (born after 1994)
- ▨ Gen Y (born between 1980-1994)
- ▨ Gen X (Born between 1965 - 1979)
- ▮ Baby Boomers (Born before 1965)

Colt Group turnover rate**

Year	Rate
2021	13.3%
2022	14.3%
2023	9.3%

**Turnover as of 31st December

The employee turnover rate has fallen to 9.3% during 2023, after an increase in 2022*

*Colt Group turnover rate in 2022 was lower than the average total turnover in the telecommunications industry that year (18.5% Including voluntary and involuntary terminations). Source: Gartner Data Hub.

*According to the Data Protection Regulation, we are only able to disclose the above data points.
*Number of new hires as of 31st December.

Our Flexible First policy provides employees with the freedom to choose where they work, striking a balance between office and remote working that gives the best results for the customer, the business and Colties. The policy is informed by leading research and is a progressive, forward-thinking approach to post-pandemic ways of working.

The policy is now two years old and we review it regularly to make sure it continues to be effective and delivers benefits to the business and employees. In early 2023, we ran a 'Talk to your Leader' feedback initiative to ask employees how we can continue to improve our approach to flexible working. The feedback was positive specifically in regard to work-life balance, improved productivity and creating a culture of trust in employees.

As part of Flexible First and to encourage in-person connection, we have introduced regular Connection Days that provide the opportunity to plan ahead for in-person time in the office, twice a month. Attendance is not mandatory but we encourage as much participation as possible because we know connecting with purpose matters.

The importance of employee recognition

We encourage managers and employees to recognise achievements and contributions aligned with our culture and values. We value our employees and what they bring and deliver for the organisation, and it is right that we reward excellence. Colt Group's Inspire programme provides the platform to do just that, offering a range of financial and non-financial awards for acknowledging team members who make outstanding contributions.

Colt

Culture Buddy Programme

Colt

Our voluntary Culture Buddy Programme provided an amazing opportunity for new Colties from Lumen to connect with their new colleagues on a personal level and in a meaningful way. It accelerated the process of settling in, enabled the formation of friendships and a go-to contact to receive day-to-day guidance. Following the launch of the programme in 2023, more than 1,200 people participated and the feedback has been overwhelmingly positive.

Diversity, Equity and Inclusion

Diversity, Equity and Inclusion is a key part of our ESG strategy to build an innovative, great and inclusive place to work. In 2023, we have made good progress with our activities under the four DEI pillars.

DEI pillars

Governance and Impact

Ensure we have the governance in place to deliver on our inclusion goals, measure our success and maximise impact through industry collaboration.

Leadership and Culture

Develop our leaders as inclusive role models and drive an inclusive culture where we can harness diversity of thought for greater success.

Diverse Representation

Improve the diversity of our workplace, ensuring we represent the customers and communities that we serve.

Equitable Business Practices

Employ equitable business practices that improve the employee experience and affect positive change in the wider world.

We run an extensive and active DEI programme with activities across each pillar, such as:

- Gender Action Plan to improve gender balance throughout the business.
- RISE – our programme for emerging talent from underrepresented backgrounds.
- Allyship in Action programme aimed at bringing allyship to life.
- Optimising Accessibility – our five-year accessibility improvement plan.
- Neurodiversity research and awareness.
- Building inclusion into people processes.
- Menopause Reframed - our menopause awareness campaign.
- Pride cross-company collaboration, supporting LGBTQ+ colleagues in tech.
- We joined TC4RE - the technology community for Racial Equality.

These sit alongside guidelines and policies including:

- Global Family Leave.
- Global Transition at Work policy.
- Global Workplace Adjustments policy.
- Domestic Abuse Support Policy.
- Menopause Guidelines.

Colt's Gender Action Plan

Colt

In the technology industry, approximately 27.6% of roles are held by women globally. At the end of 2023, 31.7%* of people employed by Colt were female. Women filled 48.9% of the new positions when we hired externally; when internal hiring is included, the percentage is 42.3%.

We achieved this by focusing on an inclusive approach to hiring, by promoting gender neutral job adverts and weaving inclusion into our employee value proposition (EVP).

We also continued our focus on retaining and progressing talented women, working with our Women+@Colt employee network on several initiatives such as group mentoring circles, our Embrace Your Best development programme and our Aspire Her programme for women in India. Our Rise programme for emerging leaders from underrepresented groups comprised over 80% women.

*Figure does not include Colt DCS.

Our employee networks help us create meaningful change.
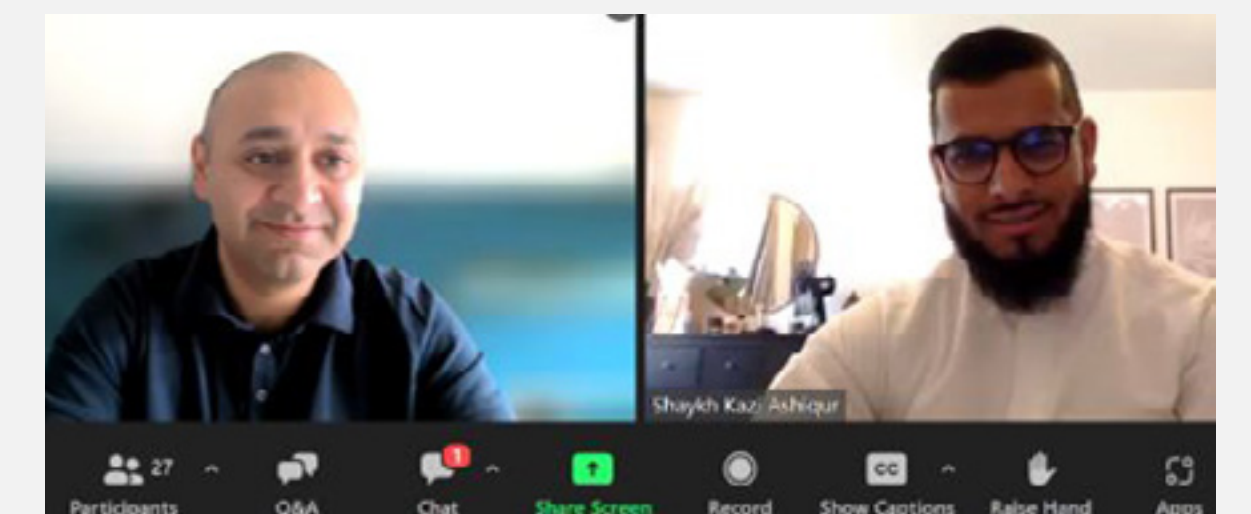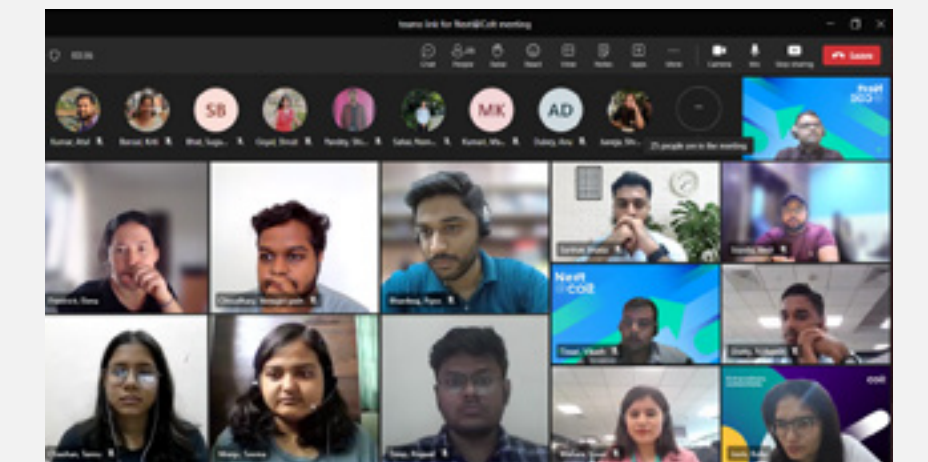
# colt

Supporting women through the menopause

Colt

We were awarded the Menopause Friendly Employer Accreditation, for creating a menopause inclusive culture where people feel able to talk about their experiences and are given the support they need. We are one of only a handful of companies in the telecoms industry to meet these requirements.

We are continually developing our inclusive working environment. The specific measures that led to this award are the Menopause in the Workplace internal intranet area, our Menopause Champions, the internal Menopause Musings Podcast, the Menopause Support Group and our comprehensive Menopause Guidelines for managers and employees.

An area of focus in 2023 was accessibility, the practice of making information and environments meaningful and usable for as many people as possible. It involves physical and digital spaces and the way we communicate with both employees and customers.

We created a five-year roadmap with the aim of optimising accessibility. This is a journey for our business and encompasses five key areas:
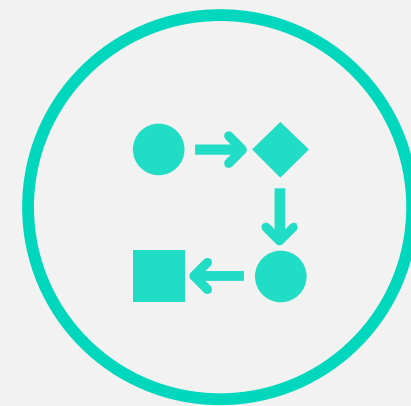
Governance **Employee Experience** **Awareness & Skills** **Brand & Reputation** **Customer Experience**

In 2023, we have laid the foundations with several initiatives:

- Working with our procurement teams to bring accessibility considerations into how we buy digital products and services.

- Accessibility built into MyColt, our new intranet, our reward platform and our onboarding resources.

- Formed a Community of Practice group to support in driving the change across our business.

- Launched digital accessibility guidelines for the business: a programme of training sessions in conjunction with accessibility specialists. The goal was to reach 10% of employees and over 500 people attended. We will be extending this in 2024.

- Strengthened feedback mechanisms to gain the inputs of people impacted by a lack of **accessibility**.

Accessibility Community of Practice

Colt

Our Community of Practice helps to raise awareness across our different business functions, ensuring accessibility is considered at the start of each programme and initiative. By the end of 2023, the Community of Practice had grown to 30 people. This group receives further development to support colleagues and help accelerate change.

#ChangeTheFace Alliance to support neurodiversity

Colt

We are part of the #ChangeTheFace Alliance, alongside other technology companies, which aims to increase diversity and inclusion in the sector. In 2023, we joined Vodafone, Nokia and Samsung to take part in a research study on neurodiversity in the technology sector, conducted by the Tavistock Institute of Human Relations. The research included a survey of over 2,000 people at the four participating companies and made recommendations for improving the experience of neurodivergent colleagues. We have already started incorporating those recommendations.

Neurodiversity has continued to emerge as an important element to consider in inclusion strategies. In addition to contributing to the #ChangeTheFace research study on neurodiversity, we have made strides in raising awareness about neurodiversity. We have produced a suite of resources available to employees including e-learnings for managers on how to support neurodivergent team members.

As part of our Optimising Accessibility strategy, we developed guidance to make sure that our physical and digital spaces are accessible, including for those who are neurodivergent. This includes office spaces, our website and our apps.

The importance of male allyship

Colt

The DEI conversation is typically dominated by the female voice. However, male colleagues also have an important role to play and we can't create sustainable change without them. We know that rigid gender stereotypes have a negative impact on men too and we need to find a new way to talk about these issues and the allyship conversation is a key part of this. To date, over 500 people have taken our Allyship in Action Pledge, choosing one of eight allyship traits to practice and develop as an ally and encouraging others to do the same by tagging them on our internal social media platforms. As part of Allyship in Action, which will be expanded in 2024, we have developed Brave Spaces for male allies to learn, support each other and ask questions in a safe environment, providing the forum for these important conversations.

colt

Supporting transgender and non-binary colleagues

Colt

Transgender and non-binary people make up a small proportion of any population and the technology sector is no different. There is a danger, therefore, that every transgender person automatically has to become an activist to make sure they are heard, whether they want that role or not. However, at Colt we believe that inclusion means anticipating the needs of others, not simply being reactive.

In 2023, Colt's Pride Matters employee network teamed up with other LGBTQ+ employee networks in the sector to find out how to improve inclusion for transgender employees. Following a series of events, where the voices from the community were front and centre, the group shared some recommendations and resources with other businesses in the lead up to Transgender Inclusion Week.

This collaborative group's work continues with the aim of raising awareness, sharing best practice and supporting LGBTQ+ colleagues.

Important recognition for our LGBTQ+ work

Colt

We were presented with a Gold Award by Stonewall for our work on LGBTQ+ inclusion in the UK, putting us firmly in the top 100 companies. This follows our support of organisation Micro Rainbow and Stonewall Housing, events covering LGBTQ+ Identity in the Workplace and improved support and awareness raising for transgender and non-binary people in technology. It is also testament to the great work our Pride Matters employee network does to drive change.

As a company, we still have more to do when it comes to inclusion and diversity and we are always striving to be better. We are committed to expanding our efforts to promote inclusion in the workplace and will use external recognition as motivation to do even more in the future. These memberships, awards and accreditations show we are on the right track and making significant progress.

Accreditation and memberships

The Tech She Can® Charter	RACE AT WORK CHARTER	♥ Valuable 500	✦ Stonewall Acceptance without exception
</> TECHTALENT CHARTER:	▣☑ disability ▣☑ confident COMMITTED	#CHANGE THE FACE	🔷
MENOPAUSE FRIENDLY	Stonewall LGBTQ+ INCLUSIVE EMPLOYER GOLD AWARD 2023	Stonewall LGBTQ+ INCLUSIVE EMPLOYER TOP 100 2023	Stonewall LGBTQ+ INCLUSIVE EMPLOYER HIGHLY COMMENDED NETWORK GROUP 2023
TC4RE Technology Community for Racial Equality	Inclusive Employers		

Learning and development

We aim to attract and retain a high-performing and diverse workforce. We want to grow the capability of our people by developing their skills, knowledge, competencies and confidence.

A key part of this is investing in the training and development of our people. We run an active training and development programme at Colt Group, that covers a combination of compliance, technical skills as well as personal development and leadership.

Because our business is spread across many different geographies, we focus on virtual sessions as this is the most efficient way of delivering training to as many people as possible. We provide in-person training either through the central HR function, or deliver 'train-the-trainer' sessions that provide local leaders and HR teams with the tools to deliver the content.

All new Colties from Lumen were asked to complete two mandatory training courses on Data Protection and our Code of Conduct by the end of 2023. For 2024, we are providing dedicated training sessions specifically customised for the needs of new Colties from Lumen.

Connection+ training sessions

Colt

Connection+ was introduced in 2023 as a joint initiative between the HR Enablement and Talent teams to provide structure to 'meeting with purpose' and a way to offer in-person learning and connection opportunities.

It was one of the ways we worked to embed Flexible First by getting the balance right between flexibility and connection and to offer more learning opportunities. In 2023, around 1,789 people took part in Connection+ training sessions.

Some of the topics we covered included how to create enduring, positive habits; future-proofing your career; mastering the art of feedback and mindfulness masterclasses.

2023 mandatory training completion rate*	Colt Group employees	Colt Group employees - new joiners
Business Continuity	99.3%	95.7%
Conscious Inclusion at Colt	99.5%	98.2%
Prevention of Sexual Harassment in the Workplace (PoSh)	99.8%	97.7%
Security Awareness at Colt	98.7%	98.2%
Code of Conduct	99.3%	97.5%
Data protection	99.4%	99.0%
Brand and Vision training (Colt only)	NA	97.5%
Health and Safety	NA**	97.2%
Action on Environmental Sustainability	99.7%	98.0%

*Data in the table above include the following employment types: Employee, Apprentice, Graduate Rotational, Fixed Term Employee, Intern, Contractors Trainee. Data includes active employees and excludes Contractors Ongoing.

**The health and safety training is only mandatory for new joiners. This meets legal requirements.

We want to build, connect and empower high performing people to drive profitable growth

2023 trainings*	Number of courses completed	Number of people trained	Number of hours	Average hours of training
LinkedIn Learning	6,861	1,075	8,571	7.9
Stepping Into Leadership programme (Colt only)	45	60	1,096	18.3
Leading the Colt Way	15	955	1,432	1.5
Performance Management	6	154	115.5	0.8
Connection+ learning sessions	34	1,789	2,683	1.5

*Data in the table above include the following employment types: Employee, Apprentice, Graduate Rotational, FixedTerm Employee, Intern, Contractors, Trainee. Data includes active employees and excludes Contractors Ongoing.

We are committed to the highest ethical behaviour. All employees are required to complete mandatory training in a range of areas, including Code of Conduct, Security Awareness, Data Protection, Conscious Inclusion and Prevention of Sexual Harassment in the Workplace (in India).

In 2023, Colt DCS launched its AIM Framework, serving as the foundation of our vision to be an employer of choice. The AIM framework was created for employees to help guide, connect and navigate their career journey, and it's how we're connecting our people to the heart of Colt DCS.

Management Matters

Colt DCS

To enhance people management skills and to ensure consistency in management practices, at Colt DCS we created a new company-wide Management Matters training programme. The programme consists of three key areas: Managing Self, Managing Others and Managing Culture. This programme was delivered in-person to all line managers at Colt DCS, covering the importance of effective one-to-one conversations, goals setting and performance reviews as well as driving the balanced scorecard forward.

Training for new and existing leaders

Colt

We provided Leading the Colt Way: a 90-minute online training programme designed to encourage behavioural change, to all 1,300 managers across the business. The focus was on building trust, growing people and, because of the changes in the business, creating readiness for change.

Around 150 new managers took the comprehensive Stepping into Leadership course, with a focus on Colt's values and behaviours. We hosted Management Matters, our mandatory leadership foundation course as well as technical training and some LinkedIn training modules.

During 2023, Colt also provided change readiness training for its senior leaders throughout the business. This was a series of three modules designed to support them when leading the organisation through change. These sessions were then cascaded by the leaders to managers in their own business units.

colt

Technical training
Colt

Colt Technical Training Academy is a community moderated by our Technical Training Team. It provides full access to all in-house technical recorded webinars, eLearning content, bite-sized learning videos, and links to technical training collateral such as PowerPoint slide decks and lab guides. It also includes relevant content from external vendors and Colt Subject Matter Experts. In 2023, we achieved an 115% increase in the number of participants to live technical training sessions.

1,276
Number of people trained in live technical training sessions 2022

2,742
Number of people trained in live technical sessions 2023

115%
Increase in number of people trained (variation against 2022)

In 2023, we refreshed our New Joiner Academy to improve the new joiner experience. It remains our core content source for new joiners and employees returning from long-term leave. It has been simplified to provide a better experience with a focus on ensuring the content is accessible for all employees. It was also curated as part of the onboarding experience for new Colties from Lumen.

Exceptional NPS for our training
Colt

We measure the effectiveness of our leadership and development programmes using an NPS score. In 2023, the average Net Promoter Score training feedback was 72%, exceeding the 'exceptional' score threshold of 70%.

As well as developing new training programmes, we work hard to ensure people have access to training resources they can access whenever they like; apart from formal training sessions, there is a catalogue of online training programmes people can freely access.

Colt Excel is our learning portal for customer-facing teams, with over 15,000 assets. In 2023, 3,500 people used LinkedIn training modules. An objective for 2024 is to review this extensive library to ensure it continues to provide the right resources.

For 2024, we are providing dedicated training sessions specifically customised to the needs of new Colties from Lumen, available through Colt Excel and the online training platform Percipio.

MentorU programme
Colt DCS

Colt DCS' mentoring programme was developed following feedback from our People Matters survey, highlighting mentoring as an opportunity to improve employee engagement and development. By prioritising the integration of new joiners, the programme ensures that employees can contribute effectively from the start, creating a welcoming atmosphere that nurtures a sense of community and belonging. It accelerates the personal development of our employees and reduces attrition rates, particularly during the crucial initial years of employment.

At the heart of the programme lies the ambition to embed the DCS TRUST values. Mentors play a pivotal role in helping mentees align with our ethical, social and environmental principles, reinforcing our dedication to responsible business practices.

Early Career Programme

We are proud of our Early Career Programme's success. At Colt, we hired 33 graduates, apprentices, and other careers starters across India, UK, Germany, France and Spain. They have joined Sales, Sales Engineering, Marketing, Service Delivery, DIO and HR. Our early careers cohort are now supported by their line managers and buddies to discover Colt and develop in their role. We are glad to report for this cohort a retention rate of 97% (16% more than the industry average of 81%) and the outstanding feedback received after their first months at Colt achieved an NPS of 91%.

Number of graduates hired in 2023

33 total

- Bangalore 4
- France 2
- Germany 7
- Gurgaon 8
- Spain 1
- UK 11
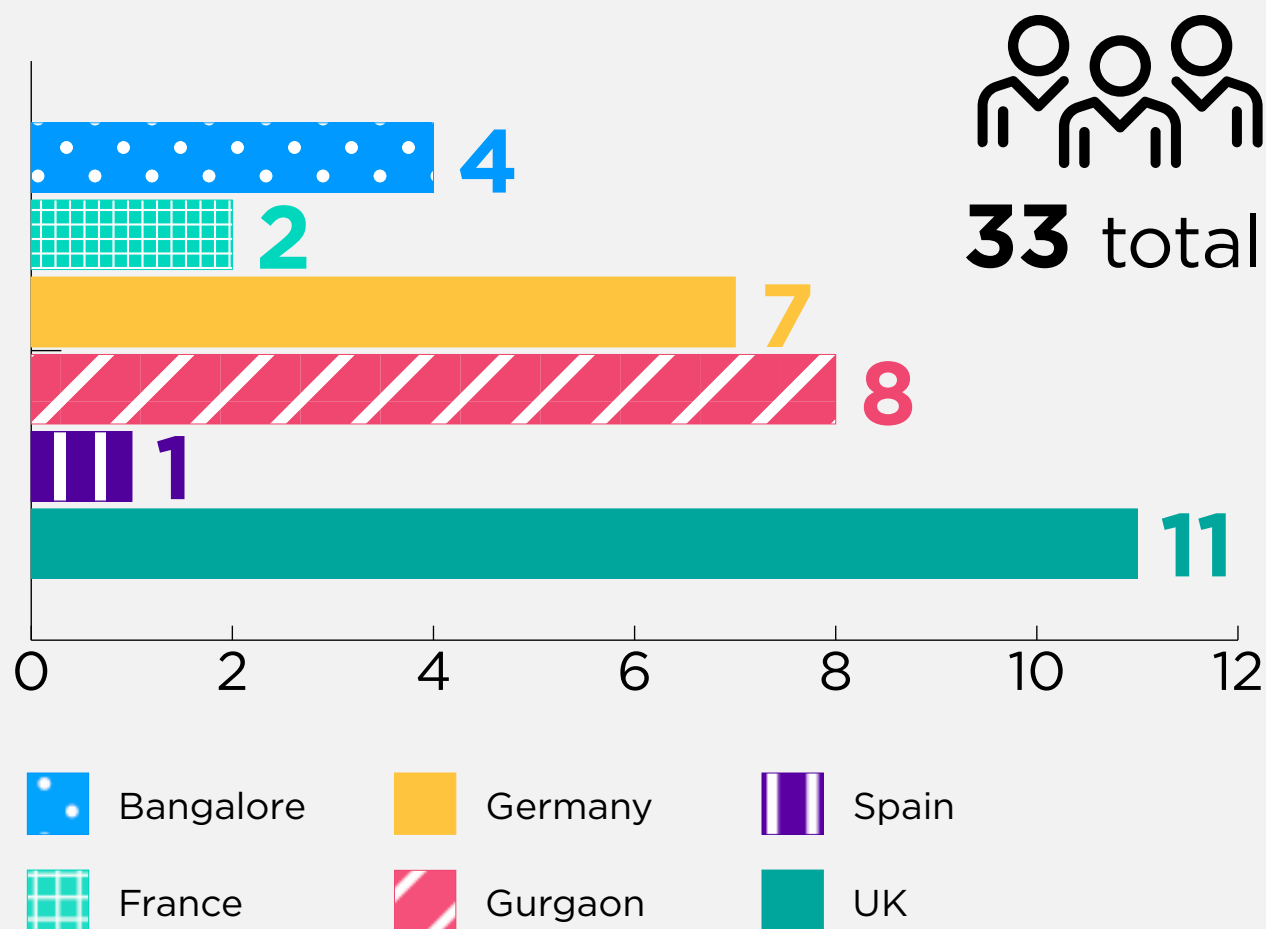
At Colt DCS, we continue to cultivate the next generation of data centre professionals through our graduate programme. Typically between 10 and 15 new graduates join each year, spanning multiple industries including engineering, operations, finance, legal and real estate development. In 2024, our active programme in Europe and Japan will be complemented by our first graduate intake in Mumbai. Colt DCS is also engaging with new hires via apprenticeship schemes, offering an additional pathway into the business via vocational courses.

Across Colt Group, we are very active in supporting our early career employees through induction programmes, specific training opportunities and dedicated feedback channels. We run in-person induction weeks for our graduates alongside training sessions for line managers and buddies to teach them how to support young talent.

Through our learning management system, we create opportunities to learn about Colt and the specific role requirements. We have a one-year programme calendar, covering all relevant development topics for the entire cohort at 'Development Days.' We actively share best practices and support peer-to-peer learning, and we regularly ask for feedback from our early career employees to make continuous improvements to the programme.

We invite you to learn more about our programme **here** and watch the Colt Early Careers videos on **YouTube**.

Employee wellbeing

Our Global Mental Health and Wellbeing policy provides guidance and advice to all our employees on issues around mental health, defining our approach to providing an inclusive and supportive environment.

We have developed a dedicated section on the intranet with guidance and advice around mental health and wellbeing, including sections on Understanding Mental Health, the Employee Assistance Programme (EAP), Mental Health First Aiders contact information and our Global Mental Health and Wellbeing policy.

We want people to be able to ask for support and for those around them to be able to recognise when someone else might need it. All employees have access to the Employee Assistance Programme that offers confidential support, resources and information. The service is a key part of our offering to support employees in both their personal and professional lives.

Wellbeing days

Colt DCS

At Colt DCS, we continue to offer four wellbeing days to all employees to encourage them to take a break and focus on their mental and physical wellbeing. These are in addition to annual leave, public holidays and any sickness leave. These four wellbeing days are highly valued by employees and the business has decided to continue offering these in 2024. We have several Mental Health First Aiders (MHFAs) across the organisation who are now fully trained. The role of the MHFAs in the workplace is to be a point of contact for an employee who is experiencing poor mental health or emotional distress. This interaction could range from having an initial conversation to making sure the person gets the most appropriate help.

All Colt Group employees have access to an Employee Assistance programme. The Employee Assistance programme provides confidential telephone and face-to-face counselling, as well as support with everyday matters such as finding childcare or eldercare, legal issues and debt management.

colt

Health and Safety

In line with our continuous improvement aim, we reinforced health and safety governance with the creation of a new H&S Steering Committee that includes key business areas in the management of our occupational health and safety management system (OHSMS).

Colt Group is aligned to ISO45001 for occupational health and safety management

Recordable work-related injuries in Colt Group*

	2021	2022	2023
Rate of recordable work-related injuries (x1 000 000)	0.2197	0.3297	0.3251
Recordable work-related injuries	2	3	3
Total hours worked	9,102,109	9,097,815	9,226,602

*Data represents the number of people employed by Colt Group, regardless of employment type (Employee, Apprentice, Graduate Rotational, Intern, Contract Trainee, Fixed Term employees); excluding Contractors Ongoing and temporary Professional Service Providers. Active and Inactive employees included.

As part of our new three-year plan, we have prioritised distributing the H&S Steering Committee even further across our business with specific actions focused on contractor and subcontractor management. It includes the review of the global health and safety training programme to ensure that everyone in our organisation has the knowledge that easily enables to them to flag health and safety-related issues during business operations.

Our OHSMS includes an automated reporting system with an incident reporting dashboard that gives the global HSE team a real-time and comprehensive overview of live and historical issues. The global team also uses this dashboard to work with local teams to help them implement the relevant actions. Centralising the process provides a comprehensive overview, simplifies the process of tracking trends, improves the speed of implementing preventative measures and makes sharing findings easier. The programme also covers subcontractors.

Community involvement

We are committed to supporting the local communities in which we operate and we encourage our employees to engage with local volunteering activities. Every employee can spend two days every year on volunteering and philanthropic activities. We help many charities, covering everything from ecological, educational, DEI and health-related causes.

867
Number of days volunteered
(+168 volunteering days/
+24% compared to 2022)

€264,218
Amount of money
donated to local charities*

*According to India's 'Companies Act, 2013', it is mandatory for all companies to contribute 2% of its profit towards CSR activities. Figure includes this amount.

In 2023 we launched our Global Social Impact strategy, bringing a more strategic approach to managing our community activities and ensuring they are more tightly focused on areas related to what we do as a business

We support initiatives around digital education and inclusion. We bring together our expertise and resources to support the development of digital skills and STEM education, with a special focus on disadvantaged children, youth and other underrepresented groups.

As a global digital infrastructure company, we believe investing in the future is vitally important. The digital and technology job market is experiencing a widening talent gap, and we believe it is the right time to help young people on their digital education journey.

Providing sign language teaching resources

Colt

Colt India's flagship CSR project has been supporting hearing and speech impairment schools across the state of Haryana by providing the Digital Sign Language (DSL) Lab with professional teaching resources.

The sponsorship supports approximately 20 professionals including sign language interpreters, special educators, content developers, designers and video editors, computer embroidery designers, textile and design consultants and hand embroidery master trainers. Today, more than 800 school students and thousands of online students benefit from the project.

Opportunities for young people

Colt DCS

By nurturing the talents and aspirations of young people, we not only empower young individuals with education, skills and opportunities, but also contribute to building a robust and dynamic workforce capable of tackling complex global issues and driving positive change.

In 2023, Colt DCS continued to support the children's concert and the Keihanna Science Festival 2023 in Japan. The Science Festival brings together universities, research institutions and businesses to educate students on science, innovation and technology.

In the UK, Colt DCS is participating in a mentoring programme with local schools and colleges together with our construction partner ISG. In April, we attended the Guru Nanak Sikh Academy Careers Fair to support the school in providing valuable mentoring and career advice to students aged 11 to 18 years. This was a great opportunity to educate young people about what we do as a data centre operator, and the skills and education required to pursue a career within this growing sector.

We are proud of our collaboration with the charity Mirai no Mori, a non-profit organisation that creates life-changing outdoor programmes for abused, neglected, and orphaned youths in Japan, supporting their growth into a happy and successful adulthood. We invited a group of five students and two instructors to our data centre for a day of education, engagement and a tour.

Supporting a charitable music festival for intergenerational connection

Colt

We supported a grassroots music event, the 19-Something Festival, with all proceeds going to Age UK Reading, a local charity that helps elderly people. Young emerging bands and DJs performed for audiences of all ages, creating a bridge between different generations.

Thanks to the generous contributions of attendees, funds raised during the event have helped the charity deliver some of their regular services throughout the community. These include footcare for around 1,000 people, Therapeutic Dementia Groups, a social club for people with long-term health conditions, a befriending service, a lively town centre coffee morning, an information and advice helpline and advice service for unpaid carers, a carers support group, trusted shopping and gardening services.

The event was a huge success, having younger generations support the older ones, and it even received coverage on the regional Berkshire and Oxfordshire radio show BBC Sounds Berkshire. We are already planning the next edition for November 2024.

colt

Sponsoring the international marathon in Sibiu

Colt

For the fifth consecutive year, Colt has been the volunteer partner and one of the sponsors of the International Marathon in Sibiu, the biggest sports and charitable event in the city. The event hosts over 6,000 runners and 600 volunteers, all raising funds for 40 local charities, including Colt Romania's charity partner Asociatia de Poveste: a charity that supports orphaned children.

Volunteering in Colt

France

Paris:
- La Course des Lumieres – walking to raise awareness for cancer
- Waste collection in Bois de Boulogne

Netherlands

Donation of 25 laptops to five schools

Germany

Frankfurt: Baking cakes to raise money for the Animal Rescue centre in Lviv

Spain

Support for the FDI Foundation and the reforestation in an area of Madrid

Romania

Sibiu: Planting trees in Belvedere Park

Portugal

Support from the ANRAM Association for vulnerable youth by providing internet connection and software to improve their learning infrastructure

Hong Kong

Supporting our long-term charity partner, Heep Hong Society, that helps with education and rehabilitation for children and youth with diverse needs

Italy

Collecting money for a local charity supporting children with autism

India

Digital sign language project

Austria

Vienna:
- Delivery of hot soup for homeless people
- Colleagues raised money for the peace fleet Mirno More, the largest peace sailing project for children and young adults who are the victims of war, refugees, have various disabilities or have social, emotional and other special needs

Singapore

Food delivery
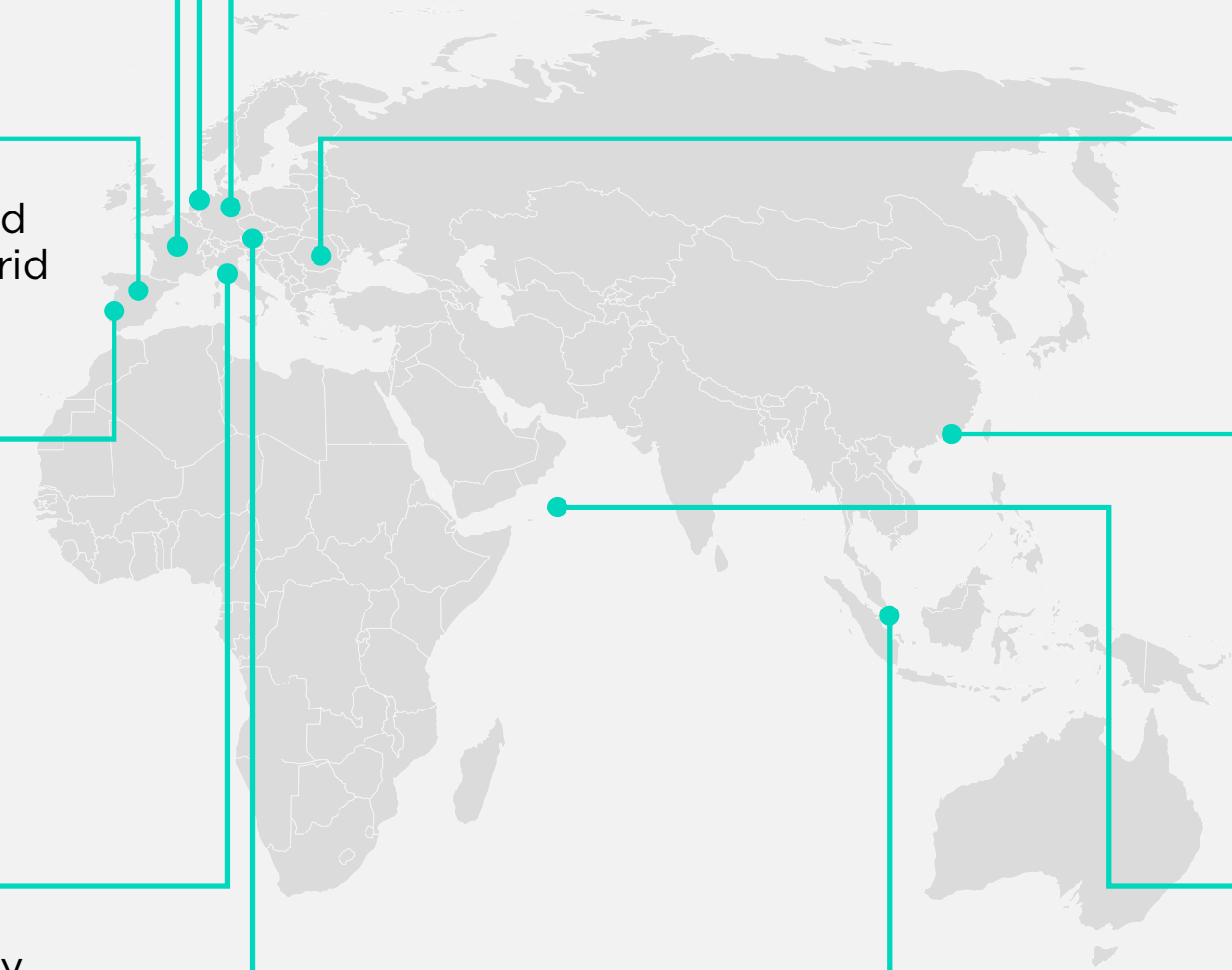
Responsible business practices

Responsible business practices

Our commitment to good governance

We are fully committed to clear governance structures that ensure Colt Group is well run, providing a solid platform for our ever-improving ESG performance and to look after the people who work for, with and around our business.

Colt Group Board members

Total: **4** members

3 non-executive   **1** executive
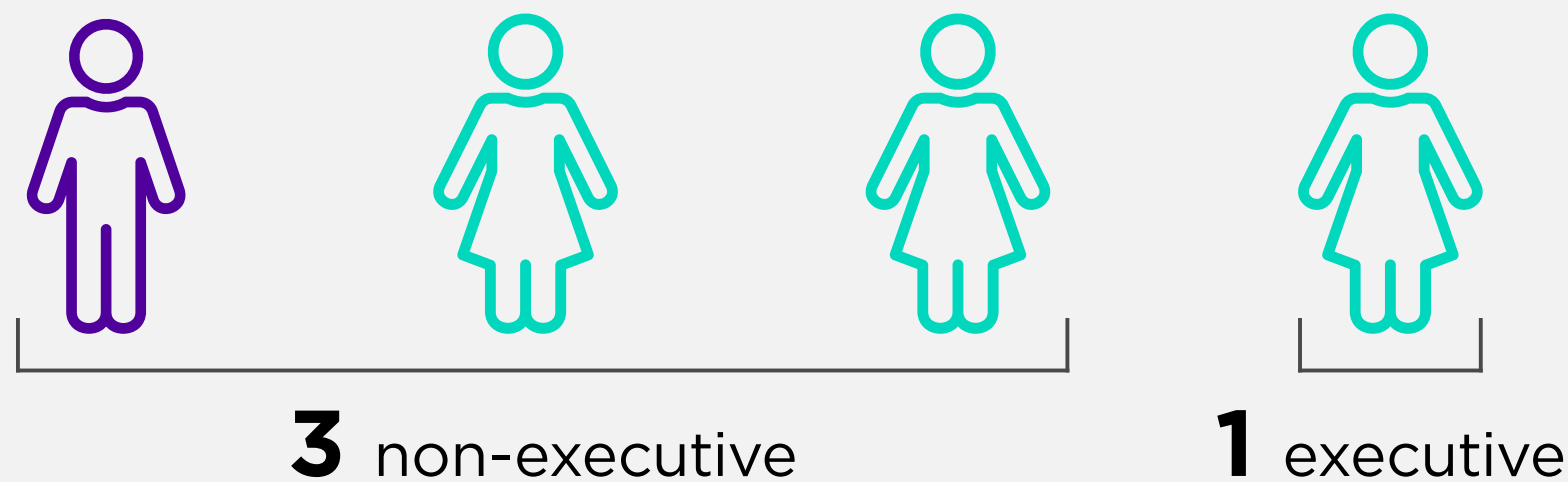
The Board of Colt Group Holdings Limited makes decisions affecting Colt and Colt DCS. On 31 December 2023, the Board had four directors, one man and three women.

The Board has four subcommittees: the DCS Board, the Audit Committee and the Colt and DCS Remuneration Committees. The Audit Committee and the Remuneration Committee members are exclusively non-executive directors.

The Environmental Sustainability Steering Committee (SteerCo) oversees our sustainability programme. It is an executive level committee co-chaired by the CEOs of Colt and Colt DCS, and it is responsible for agreeing and approving the global sustainability strategy and policies, and for the delivery against annual targets.

FTSE review shows Colt's leadership in promoting women

Colt was listed in the FTSE Women Leaders Review as one of the leaders in the telecoms industry. We were one of the three best performers when it came to Women on Boards, alongside the John Lewis Partnership as well as Ernst and Young.

This review, run by businesses and supported by the UK Government, aims at increasing the representation of women on boards and on leadership teams. It covers 400 of the largest listed and private companies in the UK, including the FTSE 350.
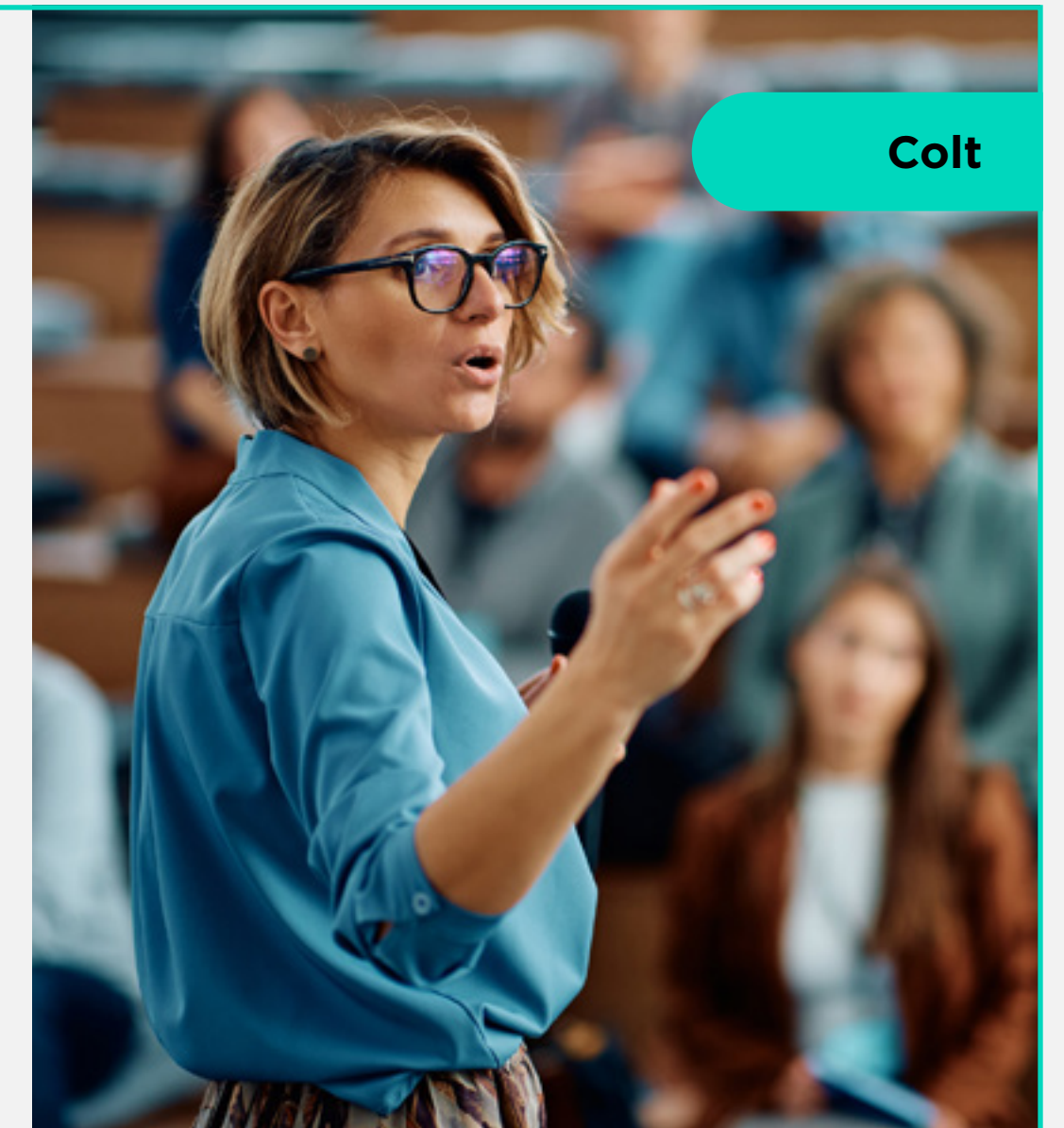
Risk Management

The Colt Group Enterprise Risk Management (ERM) Framework assesses all risks relevant to our business, including those related to environmental sustainability and our social impact. The risk management process is guided by ISO 31000 standards and follows a five-stage process of identifying risks, assessing them, deploying the appropriate measures and on-going monitoring.

Within Colt's ERM framework, there are a number of processes for ESG-related risks to be identified and assessed. Risks can be identified via the annual update of the Climate Change Risk Register, or via country specific, functional specific risk registers or the ESG risk register. Project risk registers could also, under specific circumstances, include some ESG-related risks.

At Group level, we updated the climate risk register, which identifies all climate related risks to our operations including those regarding the transition to a lower-carbon economy as well as the physical risks of a changing climate. We completed a climate scenario analysis in line with the Task Force for Climate-related Financial Disclosures (TCFD) guiding principles. Whilst our 2023 scenario analysis didn't cover Lumen EMEA activity, we identified the main typologies of physical and transition risks anticipated to be material to the new business, and we will conduct an integrated scenario analysis in 2024.

Colt Group completed its first-time reporting according to the mandatory climate-related financial disclosure as part of the Colt Group annual report and consolidated its financial statements.

Group risk also undertook risk reviews in 2023, covering the social risk areas of:

Health and safety across Colt Group

This included the identification of high priority risks, summaries of how risk is currently managed, improvement opportunities as well as an opinion on maturity of health and safety practices when benchmarked against the telecom, data centre and construction industries.

The ageing workforce

Identifying the countries and functions in which Colt has higher inherent risk exposure based on the balance of older, middle aged and younger workers as well as where roles are geographically bound, the existing controls to address the risk as well as suggested additional mitigation.

Additionally, we proactively manage social risks related to DEI and business accessibility, which are tracked through the HR functional risk register which is updated bi-annually.

Beyond ESG-related risks, we operate a group enterprise risk management programme and analyse a broad range of financial, project, operational, regulatory and strategic risks that impact our business. This expands to specialist areas such as anti-bribery and corruption, where the Colt Group periodically undertakes an assessment of risk across its business activities, benchmarking itself against the principles of the UK Bribery Act, considered one of the most stringent anti-corruption regulatory regimes in the world. This ensures adequate procedures are in place to prevent bribery.

Assessment of fraud risk is undertaken annually as part of our ongoing efforts to detect, prevent and deter fraud. Risk scenarios where factors are prevalent related to incentives and pressures, rationalisation of fraudulent actions as well as opportunities enabling fraud, are identified and assessed against existing control environments, with relevant mitigation applied.

The risks associated with the acquisition of Lumen EMEA were still being analysed at the end of 2023. They are currently focused on the short- to medium-term risks of the integration, operating in new countries and providing new products.

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Analysing and mitigating key ESG risks

Colt

As part of our risk management process we identified two key risks: climate change and ESG reporting requirements.

We are committed to lowering emissions by maintaining momentum across existing network efficiency and asset replacement initiatives, while balancing CAPEX challenges and managing the Lumen EMEA integration. The impact of climate change is managed through our environmental strategy.

ESG reporting will be subject to increasing scrutiny and we are working hard to ensure we are fully compliant with the EU Corporate Sustainability Reporting Directive (CSRD) requirements. In addition, we have conducted pilots to assess our alignment with EU Taxonomy regulations and we will expand that programme in 2024.

Additionally, as part of our TCFD scenario analysis, we identified two additional material risks around carbon pricing mechanisms and extreme weather events.

In 2024, our key priorities will be to ensure climate-related risks are taken into consideration in financial and strategic planning and to expand the scope of the physical risk assessments to assess a broader range of social and environmental hazards to meet EU Taxonomy requirements.

Human rights and anti-slavery policy

We maintain the highest principles in respect to human rights. We do not tolerate slavery and human trafficking within our own operations or within our supply chain. We ensure that everyone that works for Colt Group benefits from a working environment in which their fundamental rights and freedoms are respected.

Our basis for this is the International Labour Organisation's five fundamental principles:

1. Freedom of association and the right to collective bargaining

2. Elimination of all forms of forced or compulsory labour

3. Abolition of child labour

4. No discrimination

5. Safe and healthy working environment

The Colt Board annually reviews our **Modern Slavery Act statement** which is published on our website.

64.7% of our employees in mainland Europe are covered by collective bargaining agreements, which include working conditions and terms of employment, and provide elected employee representation in line with national laws. For employees not covered by collective bargaining agreements, workings conditions and terms of employment are confirmed in the employment contracts, global and local HR policies and the employee handbook.

We have an active dialogue with our employees through the European Works Council (EWC) and National Works Councils (NWC). In countries where there is no national Works Council or union representation, we have other forms of information and consultation forums, including elected employee representatives and Colt Ambassadors.

Our Social Dialogue Statement is designed to provide a global framework for social dialogue in line with Colt's values, our diversity, equity and inclusion goals, our people agenda and global ESG strategy which is supported by local legislation in each of our jurisdictions. The Statement reflects Colt's commitments to promoting consensus and democratic involvement among the main stakeholders such as our European Works Council, National Works Councils and employee representatives in the workplace to protect labour rights. The Statement confirms our commitment to upholding the fundamental human rights set out by the International Labour Organisation (ILO).

64.7%*

of Colt Group employees in mainland Europe are covered by Collective Bargaining Agreements

*This percentage includes: employees, fixed-term employees and graduates or all employees with active and inactive payroll at Colt Group.

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Business ethics

Colt Group's 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, whistleblowing and legal compliance. There were no major changes to our Code of Business Conduct in 2023, though there were some drafting amendments and alterations to specifically cover the UK Bribery Act and the US Foreign Corrupt Practices Act. Further detail was incorporated into the 2023 update in relation to conflicts of interest, environmental sustainability and public reporting of non-financial information, in line with our ESG practices.

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

99.3%*
of Colt Group employees have completed the Code of Business Conduct training

*Data includes active and inactive employees and excludes Contractors Ongoing. The completion rate for new joiners was 95.7%. The completion rate for new Colties from Lumen was 94.9%.

New Colties from Lumen were required to complete training courses on the Code of Conduct and Data Protection by the end of 2023.

In addition to the Colt Code of Business Conduct, the two other Group policies that applied to new Colties from Lumen in 2023 were the Colt Travel and Expenses policy and the Colt Authority Matrix (that sets out the level of authority required for financial and non-financial transactions within Colt Group). All other existing Lumen EMEA policies are part of the integration programme.

We encourage employees to raise breaches of the Code of Business Conduct through the independent Business Ethics Line or by reporting to the Ethics Committee. In late 2023, Colt DCS formed a DCS Governance Committee for all DCS employees to raise actual or suspected breaches of the Code. Due to its formation being at the end of 2023, we have not made reference to the DCS Governance Committee throughout this report. For the avoidance of doubt, reference to the Ethics Committee includes all Colt Group reports. We have the structures in place for anonymous whistleblowing wherever it is permitted by local law.

The Ethics Committee is responsible for reviewing any suspected compliance breaches. It also runs one activity each month to raise awareness 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 Colt Code of Business Conduct. The Colt Board's Audit Committee oversees the Ethics Committee regarding breaches or suspected breaches of the Code.

The members of the Colt Board and its subcommittees receive training around their duties when appointed to their role. The Colt Board and its subcommittees are fully aware of the UK Companies Act 2006 duty to declare a conflict of interest in any matters presented to them. Related parties transactions are independently assessed as part of the statutory audit.

Data privacy and cybersecurity

The Group's **Data Privacy Statement**, published on the Colt website, enables us to manage privacy, and protect personal and corporate data. We apply the joint principles of Privacy by Design and Privacy by Default at the inception of every product, application, policy and system, and ensure those principles are the basis for decision-making throughout their entire lifecycle.

Our rules for data protection and data transfer are defined by Colt's Binding Corporate Rules (BCR). These rules have been approved by the European Data Protection Board (EDPB), which also approved the Group's Privacy and General Data Protection Requirements (GDPR) compliance programme. The process of BCR data mapping of Lumen EMEA has begun and is expected to be completed by 2025.

In 2023, Colt was awarded the ISO27701 certification for its privacy information management system, which is an extension of ISO27001. This Global standard provides the framework for organisations looking to put in a system to support the compliance with the EU GDPR and other Data Privacy Requirements.

![colt]

ISO 27701 for privacy information management

Colt

We have added ISO 27701 to our certification portfolio. It covers the establishment, implementation, maintenance and continuous improvement of our privacy information management system. It also provides the framework to demonstrate compliance with GDPR international privacy regulations and other global data privacy requirements. Importantly, it gives our customers peace of mind that we comply with the strictest security protocols available.

We are proud that Colt is one of the only digital infrastructure companies to have been granted the certification on a country-by-country basis. This required us to assign a Special Person of Contact (SPOC) in each business area in all the EEA countries and India. In a process that took nearly 12 months, the SPOCs received additional training, and were audited both by an internal body and the external company that awarded the certification.

High-level certification in the National Security Scheme in Spain

Colt

In November, Colt received the highest level of certification under Spain's Esquema Nacional de Seguridad (ENS), the National Security Scheme. This achievement reflects Colt's commitment to the protection of information and our customers' security. And it was only possible thanks to the dedication and hard work of a dedicated team of Colties in Spain and beyond.

The certification demonstrates our ability to ensure the confidentiality, integrity and availability of information, and that we meet the most rigorous cybersecurity requirements. It also shows we are a reliable and secure service provider with a team of dedicated security experts.

This certification also shows our ongoing commitment to investing in advanced technology and best practices to ensure a secure environment for our customers, across the most demanding markets and industries.

We have implemented a data breach compliance procedure for employees, customers and third parties. Annual training in Data Breach and Data Privacy compliance is provided to all Colt Group employees.

99.4%*
of Colt Group employees completed Data Privacy training

*Data includes active and inactive employees and excludes Contractors Ongoing. The completion rate for new joiners was 99%. The completion rate for new Colties from Lumen was 95.5%.

Colt DCS does not manage customer information. Instead, it is responsible for the buildings, their power, lighting, air conditioning and the connection to the Internet. Colt DCS uses Cyber Essentials Plus, the highest level of certification offered under the Cyber Essentials scheme. It is certified to ISO 27001, covering information security management systems. And all the data centres are Statement of Organisational Control 2 certified, which assesses a company's system security, availability, processing integrity, confidentiality and privacy. An extra layer of security comes from monthly updates from external security consultants.

Following the legal separation of Colt DCS, Colt Group's Binding Corporate Rules (BCR) no longer apply to Colt DCS. Colt DCS is now subject to its own BCRs.

Tackling scammers at source

Colt

Colt has joined Stop Scams UK, an industry-led collaboration of responsible businesses from across the banking, telecoms and technology sectors who have come together to 'help stop scams at source'. It enables and facilitates the development of technical solutions that help prevent the harm and loss caused by scams. Joining Stop Scams UK underlines our commitment to tackling fraud in all its forms. By collaborating closely with our industry peers, we will help develop proactive measures that prevent fraud while upholding our social responsibilities, and safeguarding our organisation and valued customers.

By working together, we have the power to make a significant impact in the fight against fraud, strengthening our efforts and reinforcing our position as leaders in fraud prevention.

The main change to international data protection regulations in 2023 was the introduction of a new Digital Personal Data Protection Act in India. The measures are close to the EU's GDPR legislation, meaning it did not require substantial changes to the Colt Group's compliance activities.

Appendix

Appendix

Materiality analysis: how we identify and manage material topics

The business and regulatory landscape that we operate in evolves constantly. To continue to align with emerging stakeholder expectations and industry best practice, we continually assess our materiality analysis.

In 2022, we undertook an extensive review of our ESG materiality assessment. We have based our 2023 sustainability report on that same assessment. We benchmarked ourselves against eight companies consisting of customers, competitors and admired peers, and then conducted interviews and surveys with 41 Colt executives and managers, interviewed five external stakeholders and reviewed the relevant industry ESG materiality standards from SASB and the GeSI.

The agreed prioritisation of the ESG material topics guides Colt Group's ESG strategy and drives our decision-making around our ESG activities.

Business resilience and adaptation	Waste and circular economy	Customer experience satisfaction	Cybersecurity, privacy and personal data protection	Climate change and GHG strategy
Energy management and consumption	Employee well-being and Health and Safety	Employee growth development and training	Engaging with communities	Land and biodiversity
Water management	Ethical and transparent business practices	Diversity, equity and inclusion	Respect for human rights	Innovation and digitalisation
Providing technology solution for societal challenges	Employee engagement	Responsible supply chain management	Foster dialogue with stakeholders	Anti-corruption processes and training

Please see the GRI Content Index for more information on how we define and manage our material topics.

Material topic	Description	Where to read more
Business resilience and adaptation	Mitigating risks to the continued operations of our business.	**Risk management**.
Waste and circular economy	Minimising manufacturing waste and disposing of waste in the most responsible manner and contributing to the circular economy.	**Circular economy**. **Nature, biodiversity and water consumption**.
Customer experience and satisfaction	Going above and beyond for our customers.	**Expansion**. **Innovation at Colt Group**. **Collaboration**.
Cybersecurity, privacy and personal data protection	Defending Colt's Group assets against all threats from cyber attacks and protection of personal data.	**Data privacy and cybersecurity**.
Climate change and GHG strategy	Mitigating Colt Group's impact on climate change by reducing GHG emissions and air pollution across its value chain.	**Our journey to net zero.** **Data-driven carbon strategy.** **Energy efficiency.**
Energy management and consumption	Reducing energy use and investing in renewable energy.	**Data-driven carbon strategy**. **Energy efficiency**.
Employee wellbeing and Health and Safety	Championing workplace safety to achieve a workplace of zero injuries, and providing a work environment that supports wellbeing.	**Employee wellbeing**. **Health and Safety**.
Employee growth, development and training	Attracting talented employees and supporting their development and growth.	**Learning and development**.
Engaging with communities	Creating a positive impact on the local community and the local environment in the places where Colt Group operates.	**Community involvement**.
Land and biodiversity	Sourcing materials and designing buildings in a way that minimises the impact to natural habitats.	**Nature, biodiversity and water consumption**.
Water management	Achieving water efficiency and ensuring continued and equal access to water for communities in the areas where Colt Group operates.	**Nature, biodiversity and water consumption**.
Ethical and transparent business practices	Adhering to the highest standards of honesty and integrity, prompting effective and accountable corporate governance practices and including transparent reporting.	**Our commitment to good governance**. **Business ethics**.
Diversity and inclusion	Valuing the different perspectives brought by our diverse global teams.	**Diversity, Equity and Inclusion**.
Respect for human rights	Protecting the rights of all people in our operations and those of our suppliers.	**Our commitment to good governance**. **Human rights and anti-slavery policy**. **Business ethics**. **Collaboration**.

Material topic (continued)	Description	Where to read more
Innovation and digitalisation	Developing innovative products with sustainability characteristics.	**Expansion**. **Innovation at Colt Group**.
Providing technology solutions for societal challenges	Creating value for society and all our stakeholders through technological innovations and solutions.	**Expansion**. **Innovation at Colt Group**. **Collaboration**.
Employee engagement	Supporting and developing employees' connection to Colt Group.	**Our people and culture**. **Employee wellbeing**. **Health and Safety**.
Responsible supply chain management	Minimising the negative environmental and societal impacts of our supply chain operations.	**Collaboration**.
Foster dialogue with stakeholders	Building honest and strong relationships with stakeholders.	**GRI Content Index, GRI 2-19 Engaging with our stakeholders**.
Anti-corruption processes and training	Running our business and our supply chain free of corruption and making sure that our people have the tools to uphold our commitments.	**Our commitment to good governance**. **Business ethics**.

Colt Group's commitment to the UN SDGs

Colt Group is committed to supporting the United Nations' Sustainable Development Goals (SDGs) by integrating sustainability into business operations, promoting responsible business practices, and partnering with stakeholders to drive progress towards the SDGs.

SDG	Examples of activities	Where to read more
3 GOOD HEALTH AND WELL-BEING	We prioritise the wellbeing of our employees. We have continued our wellbeing and mental health policies. We have also initiated new campaigns, for example on menopause, mental health training for managers and financial wellbeing.	**Focusing on our people**.
4 QUALITY EDUCATION	Ensuring that our employees have the skills for our current and future needs remains paramount. We have updated our learning and development programmes, financed requests for external training and continued to hire new young talent into our graduate programme.	**Focusing on our people**.
5 GENDER EQUALITY	Gender equality is important to us and our Women+ employee network plays a key role in our efforts to ensure gender equality at Colt. The network volunteers also helped us develop a training programme around personal development for women at Colt.	**Focusing on our people**. **Responsible business practices**.
7 AFFORDABLE AND CLEAN ENERGY	We are committed to improving our energy efficiency and reducing our emissions. We strive to continuously improve our infrastructure to implement more energy-efficient technologies for both our own activities and our customer offering. We increased our solar energy production capacity at our data centres.	**Strategies for a greener future**.
8 DECENT WORK AND ECONOMIC GROWTH	We are dedicated to advancing decent work and economic growth by collaborating with partners to create sustainable solutions that promote economic growth, create jobs, and promote innovation. We have focused on accessibility to create an inclusive and accessible workplace for all.	**Growing stronger through expansion and innovation**. **Responsible business practices**.
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	We teamed up with external partners to create Proof of Concepts for smart buildings and offices that reduce their environmental footprint. We prioritised increasing the circularity of our network infrastructure through investment recovery partnerships.	**Growing stronger through expansion and innovation**.
10 REDUCED INEQUALITIES	We engaged with local charities to help address social and economic inequalities. We ensure ethical governance by applying robust anti-corruption and anti-bribery policies, implementing effective risk management systems, and promoting transparency and accountability in our operations.	**Responsible business practices**.
12 RESPONSIBLE CONSUMPTION AND PRODUCTION	We actively work towards reducing waste generation. Some of our data centre sites have become certified zero-waste facilities where we are diverting 90% of waste away from landfill.	**Strategies for a greener future**.
13 CLIMATE ACTION	We are focused on reducing the impact our activities have on climate change. We invest in renewable energy solutions, set ambitious emission reduction targets and engage with our suppliers to reduce the environmental impacts in the supply chain.	**Strategies for a greener future**.
16 PEACE, JUSTICE AND STRONG INSTITUTIONS	We are implementing comprehensive supply chain engagement initiatives to ensure transparency by mapping our suppliers and monitoring their compliance with labour and environmental standards. We ensure respect for human rights in our supply chain and in our own activities.	**Growing stronger through expansion and innovation**. **Responsible business practices**.
17 PARTNERSHIPS FOR THE GOALS	We partner with other companies to achieve industry best practice, share knowledge, and develop resources to achieve the SDGs collectively.	**Growing stronger through expansion and innovation**. **Focusing on our people**.

External Assurance Statement by BSI

The sustainability activities reported by Colt Technology Services Group Limited have been independently verified by BSI over the course of a 11 day audit to a Limited Level of Assurance.

The scope of this audit has been a verification of environmental statements and social and governance claims made in the 2023 Annual Sustainability Report (for the reporting period 01/01/2023 to 31/12/23), which included data and claims in the GRI Table. These elements were measured against GRI reporting guidelines. BSI verified data, calculations and claims.

Additionally to being verified against the GRI Standard, for the social and governance claims; qualitative analysis was carried out against prevailing social and governance best practice and to verify quantitative elements, including worker statistics and claims, raw company data was requested and cross examined.

The verification of environmental statements (in relation to Scope 1, 2 and 3 GHG emissions; (a) waste quantities – total waste, waste to energy, waste to landfill, waste recycled, hazardous and non-hazardous), (b) Procurement – supplier policies, recycling and repurposing of equipment, sustainable procurement, (c) Biodiversity – related biodiversity assessments, (d) Water – utilities supply and treatment, reduction opportunities, (e) Energy – energy usage, renewable energy guarantee of origin (REGO) certificates, reductions and fleet electrification has been carried out in line with the principals and guidance set out in ISO14016:2020, to a limited level of assurance and a materiality level of 10%.

NOTE: BSI Assurance UK Ltd is independent to and has no financial interest in Colt Technology Services Group Limited. This verification opinion has been prepared for Colt Technology Services Group Limited only for the purposes of verifying its environmental and social data described in the scope above. It was not prepared for any other purpose. In making this Statement, BSI Assurance UK Ltd has assumed that all information provided to it by Colt Technology Services Group Limited is true, accurate and complete. BSI Assurance UK Ltd accepts no liability to any third party who places reliance on this Opinion Statement.

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Colt Group Certifications and management systems

ISO 9001 Quality (Expiry date: Oct 2025)	ISO 22301 Business Continuity Management (Expiry date: Jul 2025)
ISO/IEC 20000-1 Service Management (Expiry date: Sep 2025)	Cyber Essential Plus (Expiry date: Jul 2024)
ISO 27001 Information Security (Expiry date: April 2025)	Binding Corporate Rules (BCRs)
ISO 27701 Privacy Information Management System (Expiry date: April 2025)	ISO 50001 (Colt DCS data centre in France)
ISO 14001 Environmental Management (Expiry date: Jan 2025)	Certificate of Compliance with the National Security Scheme (ENS) (Expiry date: Dec 2025)

Greenhouse gasses calculation 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 Group 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 Group GHG Emissions cover the following categories:

- **Scope 1**: Natural Gas, Fuel from Own Fleet, Refrigerants, Generation of Renewable Energy and Other Fuel (in generators) consumption.

- **Scope 2**: Electricity consumption at Core and Colt DCS-owned and operated sites, including operation of EVs.

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

GHG emissions include all Colt Group countries with the exception of:

- Emissions for 2019 & 2020 do not include data on the US.

- Emissions for 2019, 2020, 2021, 2022 & 2023 do not include data on South Korea and Poland.

Emission Factors used:

- Defra 2023, 2022, 2021 & 2019 for Scope 1 across Colt Group, 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 2023, 2022, 2021 & 2019 for Scope 2 electricity in Europe, Asia and US, Scope 3 categories (Homeworking, Downstream Leased Assets and Upstream Leased Assets).

- EORA emission factors for Scope 3 Purchased Goods and Services and Capital Goods spend-based GHG emission calculations in 2023. Quantis emissions factors were used for those categories in 2022-2019.

- Emission calculations provided by DHL for Scope 3 Upstream Transportation and Distribution category.

We are continually working towards best practices, collecting actual data (even if it is from previous years), and updating methodologies. Since last year, we have established a quarterly emissions reporting programme. This allows us to collect data more frequently, accurately track anomalies and improve overall accuracy. This has resulted in a restatement of the previously reported 2022 emissions due to the collection of actual data to replace estimations. In particular, we collected additional 2022 actual electricity consumption data in the UK, Spain, France and Portugal leading to an update to the energy consumption and to Scope 2 location-based and Scope 3 market-based emissions (FERA). All data changes in 2022 are minor and immaterial to overall emissions.

If any updates lead to a material change in the overall emissions for a reporting period, Colt Group will initiate a process to determine whether it is practicable to formally restate. We define a significant change as +/-5% of total emissions.

Gross location-based indirect (Scope 2)
GHG emissions in metric tons of CO_2 equivalent (restated data)

2021	2022	2023
76,689	53,583	50,934

Gross location-based indirect (Scope 2)
GHG emissions in metric tons of CO_2 equivalent (published in 2022)

2021	2022
76,689	53,708

Total Group electricity consumption – Scope 2 (MWh) (restated data)

2021	2022	2023
246,957	196,703	177,923

Total Group electricity consumption – Scope 2 (MWh) (published in 2022)

2020	2021	2022
269,234	246,957	197,767

Global Reporting Initiative (GRI) Content Index

Statement of use	Colt Group has reported in accordance with the GRI Standards for the period 1 January 2023 – 31 December 2023.
GRI 1 used	GRI 1: Foundation 2021

GRI Standard/Other source	Disclosure	Location/Direct answer		SDG
GRI 2: General Disclosures 2021	2-1 Organisational details	Colt Technology Services Group Limited's ('the Company') principal activity is to act as an intermediary holding company within the group comprising Colt Group Holdings Limited and its subsidiaries ('the Group').		
		The Company is a private company limited by shares, and is incorporated and registered in England and Wales, United Kingdom. The address of its registered office is Colt House, 20 Great Eastern Street, London, England, EC2A 3EH.		
		We were founded in 1992 as City of London Telecommunications (COLT), backed by Fidelity. We expanded our operations into Europe, Japan and the USA in the following two decades. In 2010, we rebranded from COLT to Colt Technology Services, and in 2014, we extended our reach into Asia Pacific and the USA.		
		In 2015, Colt Group was delisted from the London Stock Exchange and formed two operationally distinct businesses: Colt Technology Services (Colt) and Colt Data Centre Services (DCS). Colt Group is owned by Fidelity Investments, solidifying us as one of the most financially stable businesses in our industry.		
		In 2023, Colt Group acquired the Lumen EMEA business, which comprised the purchase of 49 entities. The acquisition has extended Colt Group's reach further into Eastern Europe and parts of Africa.		
		Colt Group has subsidiaries in the countries listed in the Subsidiary undertakings section of the latest consolidated financial statements filed at **Companies House**.		
	2-2 Entities included in the organisation's sustainability reporting	Colt Group has 122 subsidiary undertakings, as per the latest consolidated financial statements filed at **Companies House**.		12.6
		Colt Group completed the acquisition of Lumen's EMEA business on 1 November 2023. Given the timing of the acquisition, the information and data included in this report excludes Lumen EMEA unless otherwise stated. The chapter 'Focusing on our People' does provide some data on new Colties from Lumen. Comprehensive data will be included in next year's Sustainability Report.		
	2-3 Reporting period, frequency and contact point	This is Colt Group's third Sustainability Report. These reports are published on an annual basis in June of the following year. This report covers the period 1 January 2023 - 31 December 2023.		
		This report is published on Colt's website.		
		For more information, please contact: ESGTeam@colt.net		
	2-4 Restatements of information	**Circular Economy**. **Greenhouse gasses calculation methodology**.		
	2-5 External assurance	**External Assurance Statement by BSI**.		
	2-6 Activities, value chain and other business relationships	About Colt Group, Colt and Colt DCS: Colt Group Overview. Product portfolios: • **Colt Product Portfolio**. • **Colt DCS Product Portfolio**.	Colt also engages with various partners: • **Colt Partners**. • **Colt Charity Partners**. • **Collaboration**.	8.2

GRI Standard/Other source (continued)	Disclosure	Location/Direct answer	SDG
GRI 2: General Disclosures 2021	2-7 Employees	**Focusing on our people**.	5.5 8.2 10.2 10.3

People employed by Colt Group data (full-time and part-time).

		2021		2022		2023	
		Female %	**Total**	**Female %**	**Total**	**Female %**	**Total**
France	Full-time	28%	266	30%	284	30%	270
	Part-time	100%	5	100%	3	80%	5
	Total	30%	271	31%	287	31%	275
Germany	Full-time	16%	379	16%	385	16%	378
	Part-time	80%	61	77%	60	75%	63
	Total	25%	440	24%	445	24%	441
India	Full-time	25%	1859	25%	1928	25%	1929
	Part-time	0%	0	0%	0	0%	0
	Total	25%	1859	25%	1928	25%	1929
Italy	Full-time	20%	117	20%	121	21%	117
	Part-time	100%	8	88%	8	88%	8
	Total	25%	125	24%	129	25%	125
Japan	Full-time	23%	333	24%	352	26%	357
	Part-time	0%	0	0%	0	0%	0
	Total	23%	333	24%	352	26%	357
Spain	Full-time	35%	544	36%	559	38%	550
	Part-time	90%	39	91%	33	90%	31
	Total	39%	583	40%	592	41%	581
United Kingdom	Full-time	26%	817	28%	820	30%	783
	Part-time	92%	24	77%	26	89%	27
	Total	28%	841	29%	846	32%	810
Rest of Colt	Full-time	43%	843	45%	855	46%	843
	Part-time	48%	29	48%	27	47%	30
	Total	43%	872	45%	882	46%	873
Total	Full-time	29%	5158	29%	5304	30%	5227
	Part-time	80%	166	76%	157	76%	164
	Total	30%	5324	31%	5461	31%	5391

*New Colties from Lumen are not included in the table above.

GRI Standard/Other source (continued)	Disclosure	Location/Direct answer	SDG
GRI 2: General Disclosures 2021	2-7 Employees	People employed by Colt Group data (permanent and temporary).	5.5 8.2 10.2 10.3

		2021		2022		2023	
		Female %	**Total**	**Female %**	**Total**	**Female %**	**Total**
France	Permanent	29%	266	30%	282	29%	268
	Temporary	40%	5	80%	5	71%	7
	Total	30%	271	31%	287	31%	275
Germany	Permanent	24%	422	24%	423	24%	423
	Temporary	44%	18	36%	22	22%	18
	Total	25%	440	24%	445	24%	441
India	Permanent	25%	1818	24%	1883	25%	1911
	Temporary	34%	41	36%	45	22%	18
	Total	25%	1859	25%	1928	25%	1929
Italy	Permanent	24%	124	23%	128	24%	123
	Temporary	100%	1	100%	1	50%	2
	Total	25%	125	24%	129	25%	125
Japan	Permanent	22%	313	23%	326	25%	333
	Temporary	25%	20	31%	26	38%	24
	Total	23%	333	24%	352	26%	357
Spain	Permanent	38%	572	39%	578	41%	578
	Temporary	55%	11	71%	14	67%	3
	Total	39%	583	40%	592	41%	581
United Kingdom	Permanent	27%	801	29%	818	31%	777
	Temporary	48%	40	43%	28	67%	33
	Total	28%	841	29%	846	32%	810
Rest of Colt	Permanent	37%	723	40%	730	40%	720
	Temporary	73%	149	72%	152	73%	153
	Total	43%	872	45%	882	46%	873
Total	Permanent	29%	5039	29%	5168	30%	5133
	Temporary	58%	285	58%	293	62%	258
	Total	30%	5324	31%	5461	31%	5391

*New Colties from Lumen are not included in the table above.

People employed by Colt Group data refers to the following definition in line with our internal Headcount Sourcing Policy: number of people employed by Colt Group who are captured in our core HR system. This includes the following employment types: Employee, Apprentice, Graduate Rotational, Intern, Contractor Ongoing, Contract Trainee, Fixed Term Employee. Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy are excluded. "IReq contractors" are individuals who are although in effect working directly for Colt Group, aren't treated as employees, they are managed on a day-to-day basis by Colt Group management, are sourced by Colt Group's RPO provider, they are tracked in Colt Group Systems and are included in headcount reporting. Inactive workers – i.e. those on long term leave but still directly or indirectly employed by Colt Group are also included.

GRI Standard/Other source (continued)	Disclosure	Location/Direct answer	SDG
GRI 2: General Disclosures 2021	2-8 Workers who are not employees	Omission: Information incomplete due to lack of data granularity. While contractors ongoing are included in our headcount figures (please refer to Disclosure 2-7 Employees), they are not treated as employees. At the end of December 2023 our contractor ongoing base was 0.4% in Colt Group. Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy are excluded.	5.5 10.2 10.3
	2-9 Governance structure and composition	You can view the members of the Colt Group Board here: **Our Leadership Team**.	5.5 16.6 16.7
	2-10 Nomination and selection of the highest governance body	Colt's shareholders appoint directors of the Board, which is the highest governance body of Colt Group: **Our Board of Directors**.	5.5 10.2 16.6 16.7
	2-11 Chair of the highest governance body	**Michael Wilens** was appointed as a board member of Colt Group's top company on 1 January 2012 and as Chairman on 21 March 2018.	5.5 10. 16.6 16.7
	2-12 Role of the highest governance body in overseeing the management of impacts	**Responsible business practices**. As per the latest consolidated financial statements filed at **Companies House**.	16.6
	2-13 Delegation of responsibility for managing impacts	As per the latest consolidated financial statements filed at **Companies House**.	16.6
	2-14 Role of the highest governance body in sustainability reporting	The Executive Leadership Team, Colt DCS Senior Leadership Team and the Sustainability SteerCo provide the final approval of the Sustainability Report before publication.	16.6
	2-15 Conflicts of interest	The management of conflicts of interests takes a similar approach to previous years, as seen in **Colt's 2022 Sustainability Report**, page 43, with additional provisions in regard to disclosing potential or actual conflicts of interests by employees being adopted in 2023. The **Code of Business Conduct** was updated in 2023 to include further detail and guidance in relation to conflicts of interest by way of secondary employment, proprietorship/partnership business and external directorships. Employees are required to provide disclosure of any potential or actual conflicts of interests, which may arise as part of their employment, to HR and their manager. Colt Group's Code of Business Conduct sets out the overall standard and commitments towards ethical conduct, conflict of interest, anti-corruption, whistleblowing and legal compliance. These standards extend to Colt and DCS suppliers as well as new Lumen EMEA suppliers, partners, agents, employees, and subcontractors, within the Colt Supplier Code of Conduct and Colt Partner Code of Conduct.	16.6

GRI Standard/Other source (continued)	Disclosure	Location/Direct answer	SDG
GRI 2: General Disclosures 2021	2-16 Communication of critical concerns	Colt Group has established a whistleblowing system, and our employees are encouraged to raise actual or suspected breaches of the Code of Business Conduct to the Ethics Committee, Business Ethics Line or to be discussed with line managers, at the earliest opportunity, even if in doubt the nature of the issue. No person reporting a suspected violation will be subject to retaliation because of a good faith report. Anonymous reporting is possible wherever permitted by local law. The Ethics Committee reports quarterly to the Audit Committee about breaches or suspected breaches, raised to the Ethics Committee or via the Business Ethics Hotline, of the Code of Business Conduct.	16.6
	2-17 Collective knowledge of the highest governance body	As per the latest consolidated financial statements filed at **Companies House**.	10.4 13. 13.3
	2-18 Evaluation of the performance of the highest governance body	As Colt Group is a private company, there is no obligation to fulfil this requirement.	5.5 10.3 10.4 13.3
	2-19 Remuneration policies	As per the latest consolidated financial statements filed at **Companies House**.	5.5 10.2 10.3 10.4
	2-20 Process to determine remuneration	As per the latest consolidated financial statements filed at **Companies House**.	5.5 10.2 10.3 10.4
	2-21 Annual total compensation ratio	Omission: Confidentiality reasons.	10.2 10.3 10.4
	2-22 Statement on sustainable development strategy	Our Sustainability strategy.	
	2-23 Policy commitments	Our policy commitments have been approved by our CEOs. Our suppliers are also aware of our commitments. Policy commitments can be seen in: • **Collaboration**. • **Human rights and anti-slavery policy**. • **Code of Business Conduct**. • **Supplier Code of Conduct**. • **Certifications**.	8.7 10.4 13.1

GRI Standard/Other source (continued)	Disclosure	Location/Direct answer	SDG
GRI 2: General Disclosures 2021	2-24 Embedding policy commitments	Colt Group's policy commitments are embedded in the sustainability, DEI, procurement and other programmes. Our policy implementation responsibilities are delegated to functional leads across the Colt Group. They are also embedded in our Business and Supplier Codes of Conduct, Colt Group's Code of Business Conduct is a comprehensive document for ethical conduct including critical aspects such as not tolerating bribery, speaking up to report breaches of the Code, fair competition, data protection, gifts and business hospitality, anti-fraud, prevention of money laundering and conflicts of interest. All Colt Group employees must complete annual mandatory training about the Code of Business Conduct.	8.7 10.4 13.1
	2-25 Processes to remediate negative impacts	Every breach of the Code of Business Conduct is raised in line with the below response in 2-26. All reports of suspected or actual breaches of the Code of Business Conduct raised to the Ethics Committee are fully investigated, and the Ethics Committee use lessons learned to update the Code on an annual basis, to provide recommendations on the annual mandatory Code of Business Conduct training and on organisational changes.	16.6
	2-26 Mechanisms for seeking advice and raising concerns	Colt Group has established a whistleblowing system, and its employees are encouraged to raise actual or suspected breaches of the Code of Business Conduct via the choice of available channels. Reports can be made via the independent 24/7 Business Ethics Line or by reporting to the Ethics Committee. Anonymous reporting is possible wherever permitted by local law. The Ethics Committee reports quarterly to the Audit Committee about breaches or suspected breaches of the Code of Business Conduct. The members of the Colt Board and its subcommittees receive training around their duties when appointed.	16.6
	2-27 Compliance with laws and regulations	Omission: confidentially reasons.	
	2-28 Membership associations	**Collaboration**. **Our Environmental Strategy**. **Diversity, Equity and Inclusion**.	

GRI Standard/Other source (continued)	Disclosure	Location/Direct answer	SDG
GRI 2: General Disclosures 2021	2-29 Approach to stakeholder engagement	*(see table below)*	16.7

Stakeholder Group	Colt's approach	Methods of Engagement (examples)
Customers	We aim to put the customer at the heart of everything we do, and we have an ever-evolving programme of customer intelligence that helps us to improve the experience we give our customers.	• Customer information service • Customer satisfaction surveys • Website, social media • Net Promotor Score (NPS) • Net Easy Score and programme '100 voices' to collect feedback • Customer Advisory Board held several times a year
Employees	Engaging with and having a two-way dialogue with the entire workforce is very important for the Company's purpose and vision. We operate a wide range of engagement tools to interact with employees.	• Pulse surveys & strategic surveys • Townhall meetings • Whistleblowing channels • Employee reviews • Colt Ambassador and Country Management programmes • Employee Networks • Through people leaders • Dialogue with European Works Councils and National works councils • Focus groups
Board/owners	We are a private company owned by Fidelity Investments, solidifying us as one of the most financially stable businesses in our industry.	• Regular management reporting • Management reports • Annual financial report • Annual sustainability report
Contractors and suppliers	Successful relationships with suppliers is critical for the day-to-day running of our business and supporting our service provision to our customers.	• Supplier engagement programmes, including a dedicated programme with suppliers responsible of 93% of Colt Group emissions in PG&S and Capital Goods categories • Regular supplier communication on policies and expectations, including supplier days • Supplier Code of Business Conduct • Vendor surveys
Industry peers	We regularly engage with our sector peers, as well as ICT and telecommunications-specific associations around the world.	• Membership to industry associations, including the Global Enabling Sustainability Initiative (GeSI), Metro Ethernet Forum (MEF) and many others
Communities	Connecting with our local communities is a crucial part of our engagement programme. We are aware that we can only operate efficiently if we receive a local licence to operate.	• Dialogues and direct action • Local community engagement programmes • Volunteering activities • Press releases

GRI Standard/Other source (continued)	Disclosure	Location/Direct answer	SDG
GRI 2: General Disclosures 2021	2-30 Collective bargaining agreements	Colt Group is committed to creating an environment that promotes fair treatment and a healthy work-life balance. As a result, we aim to keep working overtime to an absolute minimum and have implemented a Global Overtime policy. The purpose of our Global Overtime policy is to provide a general guideline for employees who are eligible for overtime, above the maximum statutory or agreed working hours. The Global Policy will implement a minimum standard and provision to be applied across Colt Group subject local law and/or local policies. Overtime shall not exceed the legal limit as per each country's local regulations or HR policy. Employees are advised to take at least 24 hours of rest within seven consecutive days. Colt Group provides additional remuneration to compensate for overtime work as per local law and/or local policies.	8.5 8.7 8.8

Material topics	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-1 Process to determine material topics	**Our material topics and how we manage them**.	12.6
	3-2 List of material topics	**Our material topics and how we manage them**.	12.6

Economic performance	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Risk Management**.	12.6 13.1
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	**Risk Management**. Colt Group's related risk assessment covers various types of risks, including current and emerging regulations, legal, market, reputation, and both acute and chronic physical risks. Additionally, several business opportunities have been identified resulting from climate change, such as the emerging market for low emissions goods and services, increased potential use of cloud computing, and the adoption of hybrid working. For further information, please refer to our Climate-related Financial Disclosures (CFD) in 2023 financial statements to be filed at **Companies House** after the publication of this Sustainability Report.	12.6 13.1

Anti-corruption	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Business ethics**. **Our material topics and how we manage them**.	16.5
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	**Business ethics**. Additional Anti-Bribery and Corruption (ABC) training is assigned to Colt and Colt DCS colleagues which is in addition to the mandatory Code of Business. This is a bi-annual training that was delivered in 2022. Refer to **Colt's 2022 Sustainability Report**, page 43.	

Energy	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Emissions and energy consumption**. **Our material topics and how we manage them**.	7.2 12.2

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Energy (continued)	Disclosure	Location/Direct answer	SDG
GRI 3: Energy 2016	302-1 Energy consumption within the organisation	See percentage of renewable electricity at Colt Group in **Emissions and energy consumption**.	7.2 12.2

Non-Renewable Sources	2022	2023
Natural Gas (Mwh)	1,219	1,394
Other Fuels	373,847	418,640

| | 302-4 Reduction of energy consumption | **Emissions and energy consumption**. | 12.2 |

Water and effluents	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Circular Economy**. **Nature, biodiversity and water consumption**. **Our material topics and how we manage them**.	13.1 13.2
GRI 303: Water and Effluents 2018	303-5 Water consumption	**Circular Economy**. Water consumption is a material topic for Colt DCS. No DCS sites are placed in water stress areas. Colt DCS does not have any water storage in its facilities.	

Total Water Consumption (m³)	2022	2023
Colt Group	**364,885**	**201,701**

Biodiversity	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Circular Economy**. **Nature, biodiversity and water consumption**. **Our material topics and how we manage them**.	12.2 12.6 13.13
GRI 304: Biodiversity 2016	304-2 Significant impacts of activities, products and services on biodiversity	**Nature, biodiversity and water consumption**. Not other information that what disclosed in the above section is available. Omission: not enough information.	13.3

Emissions	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Emissions and energy consumption**. **Our material topics and how we manage them**.	12.2 12.6 13.1

Emissions (continued)	Disclosure	Location/Direct answer	SDG
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	**Emissions and energy consumption**. Colt Group has an intranet area for employees explaining our baseline emissions, progress and road-map for reduction. We believe that communicating this information internally has a positive impact on our carbon roadmap. We quantify and report our organisational GHG emissions in alignment with the GHG Protocol; therefore, we only report CO_2e emissions.	12.2 13.1
	305-2 Energy indirect (Scope 2) GHG emissions	**Emissions and energy consumption**. We quantify and report our organisational GHG emissions in alignment with the GHG Protocol; therefore, we only report CO_2e emissions.	12.2 13.1

	2021	2022	2023
Gross location-based indirect (Scope 2) GHG emissions in metric tons of CO_2 equivalent	76,689	53,583	**50,934**

	305-3 Other indirect (Scope 3) GHG emissions	**Emissions and energy consumption**. We quantify and report our organisational GHG emissions in alignment with the GHG Protocol; therefore, we only report CO_2e emissions.	12.2 13.1
	305-5 Reduction of GHG emissions	**Emissions and energy consumption**.	12.2 13.1

Waste	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Circular Economy**. **Our material topics and how we manage them**. We have formalised policies through our updated Waste Management Policy, Duty of Care (Waste Control) Procedure and WEEE Disposals Policy and Procedure to manage the waste and Waste Electronic and Electrical Equipment generated by our activity. Duty of Care (Waste Control) procedure define the process to ensure third parties manages the waste in accordance with legal requirements.	12.2 12.6 13.1
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	**Circular Economy**.	13.1
	306-2 Management of significant waste-related impacts	**Circular Economy**.	11.6 12.4
	306-3 Waste generated	**Circular Economy**. We are working on the standardisation of waste types across the whole organisation. In 2023 we improved the standardisation of waste data from our operations in Europe and also from our Investment Recovery Partners. We will work on the standardisation of waste data of other geographies and areas of the business in 2024. Our aim is to provide the breakdown of Colt Group composition of waste in the Sustainability Report. We do have included the main types of waste included in the hazardous and non-hazardous figures. Duty of Care (Waste Control) procedure define the process to ensure third parties manages the waste in accordance with legal requirements.	11.6 12.2 12.4 13.1

Waste (continued)	Disclosure	Location/Direct answer	SDG
GRI 306: Waste 2020	306-4 Waste diverted from disposal	**Circular Economy**. Comments on Disclosure 306-3 also applicable. All waste generated by Colt Group is managed by third party waste companies in accordance with local legislation and the Duty of Care (Waste Control) procedure.	11.6 12.2 12.4 13.1
	306-5 Waste directed to disposal	**Circular Economy**. Comments on Disclosure 306-3 also applicable. All waste generated by Colt Group is managed by third party waste companies in accordance with local legislation and the Duty of Care (Waste Control) procedure.	12.2 12.5

Supplier environmental assessment	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Collaboration**. **Our material topics and how we manage them**.	12.6 13.1
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	**Collaboration**.	12.6 13.1

Employment	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	Colt Group prioritises transparency and reciprocal expectations. The details of working conditions are captured in the employment contract and employee handbooks of each country. These are communicated with the employee at the time of hiring and are available on the Colt Group internal portals. Colt Group also has an extensive Human Resources policy guide which lists all of its polices and their applicability. In certain jurisdictions all employees are covered by collective bargaining agreements. All employees receive full **Code of Conduct** training and HR support is available for further guidance. **Our people and our culture**. **Our material topics and how we manage them**.	5.1 8.5 10.2 10.3

Employment	Disclosure	Location/Direct answer	SDG
GRI 401: Employment 2016	401-1 New employee hires and employee turnover		5.1 8.5 10.2 10.3

Our people and our culture.

Colt Group new employee hires and employee turnover by country and gender.*

		2021		2022		2023	
		Females	Total	Females	Total	Females	Total
France	Total new hire	6.00	15.00	19.00	35.00	9.00	14.00
	New hire rate	7.50	5.54	21.59	12.20	10.71	5.09
	Turnover	9.00	24.00	10.00	18.00	12.00	25.00
	Turnover rate	10.98	8.67	11.64	6.35	14.13	8.92
Germany	Total new hire	12.00	30.00	5.00	25.00	4.00	21.00
	New hire rate	10.91	6.82	4.59	5.62	3.77	4.76
	Turnover	3.00	19.00	6.00	20.00	7.00	25.00
	Turnover rate	2.87	4.38	5.48	4.53	6.53	5.68
India	Total new hire	124.00	320.00	129.00	467.00	63.00	184.00
	New hire rate	26.38	17.21	27.16	24.22	13.18	9.54
	Turnover	92.00	286.00	109.00	374.00	60.00	175.00
	Turnover rate	19.27	15.33	23.19	19.92	12.36	8.96
Italy	Total new hire	2.00	4.00	2.00	6.00	0.00	0.00
	New hire rate	6.45	12.26	6.45	18.18	0.00	0.00
	Turnover	1.00	8.00	2.00	2.00	0.00	4.00
	Turnover rate	3.16	6.27	6.45	1.56	0.00	3.13
Japan	Total new hire	19.00	58.00	25.00	68.00	20.00	52.00
	New hire rate	25.33	21.40	30.12	23.69	21.74	14.57
	Turnover	20.00	59.00	16.00	48.00	9.00	44.00
	Turnover rate	25.97	17.36	20.13	13.94	10.10	12.18
Spain	Total new hire	25.00	58.00	28.00	59.00	15.00	21.00
	New hire rate	11.11	17.42	11.97	16.76	6.33	3.61
	Turnover	14.00	49.00	18.00	44.00	12.00	32.00
	Turnover rate	6.26	8.40	7.78	7.48	5.09	5.46

*Headcount as of 31st December.

New hire rate: (total new hires in year/total employees at end of the year) x100). Turnover rate: (total leavers in year/total employees at end of the year) x100. New Colties from Lumen are not included in the table above.

People employed by Colt Group data refers to the following definition in line with our internal Headcount Sourcing Policy: number of people employed by Colt Group who are captured in our core HR system. This includes the following employment types: Employee, Apprentice, Graduate Rotational, Intern, Contractor Ongoing, Contract Trainee, Fixed Term Employee. Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy are excluded. "IReq contractors" are individuals who are although in effect working directly for Colt Group, aren't treated as employees, they are managed on a day-to-day basis by Colt Group management, are sourced by Colt Group's RPO provider, they are tracked in Colt Group Systems and are included in headcount reporting. Inactive workers – i.e. those on long term leave but still directly or indirectly employed by Colt Group are also included.

According to Data Protection Regulation, only the above figures can be disclosed. Headcount as of 31st December. New hire rate: (total new hires in year/total employees at end of the year) x100). Turnover rate: (total leavers in year/total employees at end of the year). New Colties from Lumen are not included in the table above.

Employment (continued)	Disclosure	Location/Direct answer	SDG
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Colt Group new employee hires and employee turnover by country and gender.*	5.1 8.5 10.2 10.3

Colt Group new employee hires and employee turnover by country and gender.*

Continued		2021		2022		2023	
		Females	**Total**	**Females**	**Total**	**Females**	**Total**
United Kingdom	Total new hire	54.00	156.00	82.00	155.00	51.00	89.00
	New hire rate	22.69	8.39	33.20	8.04	19.69	10.99
	Turnover	56.00	144.00	71.00	148.00	38.00	125.00
	Turnover rate	22.47	16.76	28.69	17.54	14.42	14.91
Rest of Colt	Total new hire	75.00	145.00	79.00	125.00	44.00	69.00
	New hire rate	19.84	16.63	19.75	14.17	10.97	7.90
	Turnover	62.00	120.00	56.00	113.00	42.00	78.00
	Turnover rate	16.85	13.97	14.33	12.92	10.33	8.83
Total	Total new hire	317.00	786.00	369.00	940.00	206.00	450.00
	New hire rate	19.73	14.76	22.14	17.21	12.20	8.35
	Turnover	257.00	709.00	288.00	767.00	180.00	508.00
	Turnover rate	15.93	13.26	17.50	14.25	10.57	9.29

Colt Group new employee hires and employee turnover by age and gender.*

		2021		2022		2023	
		Females	**Total**	**Females**	**Total**	**Females**	**Total**
Gen Z (born after 1994)	Total new hire	72.00	142.00	84.00	182.00	53	125.0
	New hire rate	58.54	62.01	57.53	59.09	31	31.0
	Turnover	43.00	82.00	53.00	90.00	28	66.0
	Turnover rate	34.89	37.46	40.05	33.86	17.63%	19.5
Gen Y (born between 1980-1994)	Total new hire	174.00	416.00	196.00	551.00	107	229.0
	New hire rate	18.89	15.48	20.81	20.00	0	0.0
	Turnover	148.00	397.00	169.00	471.00	98	262.0
	Turnover rate	15.99	14.71	18.12	17.41	10.17%	9.5

*Headcount as of 31st December.

New hire rate: (total new hires in year/total employees at end of the year) x100). Turnover rate: (total leavers in year/total employees at end of the year) x100. New Colties from Lumen are not included in the table above.

People employed by Colt Group data refers to the following definition in line with our internal Headcount Sourcing Policy: number of people employed by Colt Group who are captured in our core HR system. This includes the following employment types: Employee, Apprentice, Graduate Rotational, Intern, Contractor Ongoing, Contract Trainee, Fixed Term Employee. Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy are excluded. "IReq contractors" are individuals who are although in effect working directly for Colt Group, aren't treated as employees, they are managed on a day-to-day basis by Colt Group management, are sourced by Colt Group's RPO provider, they are tracked in Colt Group Systems and are included in headcount reporting. Inactive workers – i.e. those on long term leave but still directly or indirectly employed by Colt Group are also included.

According to Data Protection Regulation, only the above figures can be disclosed. Headcount as of 31st December. New hire rate: (total new hires in year/total employees at end of the year) x100). Turnover rate: (total leavers in year/total employees at end of the year). New Colties from Lumen are not included in the table above.

Employment (continued)	Disclosure	Location/Direct answer	SDG

GRI 401: Employment 2016

401-1 New employee hires and employee turnover (continued)

Colt Group new employee hires and employee turnover by age and gender.*

Continued		2021		2022		2023	
		Females	**Total**	**Females**	**Total**	**Females**	**Total**
Gen X (Born between 1965 - 1979)	Total new hire	57.00	179.00	56.00	137.00	29	67.0
	New hire rate	11.00	8.65	10.73	6.66	0	0.0
	Turnover	48.00	164.00	51.00	149.00	34	123.0
	Turnover rate	9.29	7.91	9.70	7.20	6.48%	6.0
Baby Boomers (Born before 1965)	Total new hire	3.00	20.00	13.00	34.00	6	8.0
	New hire rate	8.33	6.62	28.89	11.15	0	0.0
	Turnover	9.00	39.00	4.00	32.00	7	36.0
	Turnover rate	22.55	12.41	9.50	10.54	15.73%	12.4
Total	Total new hire	317.00	786.00	369.00	940.00	206	450.0
	New hire rate	19.73	14.76	22.14	17.21	0	0.0
	Turnover	257.00	709.00	288.00	767.00	180	508.0
	Turnover rate	15.93	13.26	17.50	14.25	10.57%	9.3

*Headcount as of 31st December.

New hire rate: (total new hires in year/total employees at end of the year) x100). Turnover rate: (total leavers in year/total employees at end of the year) x100. New Colties from Lumen are not included in the table above.

People employed by Colt Group data refers to the following definition in line with our internal Headcount Sourcing Policy: number of people employed by Colt Group who are captured in our core HR system. This includes the following employment types: Employee, Apprentice, Graduate Rotational, Intern, Contractor Ongoing, Contract Trainee, Fixed Term Employee. Temporary Professional Service Providers/Statement of Work contractors, who are sourced in accordance with Colt Procurement policy are excluded. "IReq contractors" are individuals who are although in effect working directly for Colt Group, aren't treated as employees, they are managed on a day-to-day basis by Colt Group management, are sourced by Colt Group's RPO provider, they are tracked in Colt Group Systems and are included in headcount reporting. Inactive workers – i.e. those on long term leave but still directly or indirectly employed by Colt Group are also included.

According to Data Protection Regulation, only the above figures can be disclosed. Headcount as of 31st December. New hire rate: (total new hires in year/total employees at end of the year) x100). Turnover rate: (total leavers in year/total employees at end of the year). New Colties from Lumen are not included in the table above.

SDG: 5.1 8.5 10.2 10.3

401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees

Our people and our culture.

Employee wellbeing.

Colt Group benefits are available to all full-time and part-time employees, with the exception of ongoing contractors.

Colt Group provides:
• Pension.
• Life assurance.
• Disability insurance.
• Medical insurance.
• Company holiday entitlement.
• Employee Assistance Programme (EAP) - Provided in all countries, employees access this online or via their local phone number.
• Clear your plate days - These are added to employee calendars usually the third Wednesday every month, where an employee does not need to attend or accept a meeting and can take time away from their computers.

In some countries, employees are eligible for additional benefits such as dental insurance, health assessments, cancer screening and meal vouchers.

SDG: 3.8 10.4

Occupational health and safety	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Employee wellbeing**. **Health and safety**. **Our material topics and how we manage them**. Colt Group provides a safe and healthy workplace, and we continuously strive to improve workplace safety and employee awareness and behaviour. Colt Group's Health and Safety Policy Statement sets out our health and safety (H&S) commitments to effectively manage and safeguard the Health and Safety of our employees, contractors and any others who may be affected by our activities. Colt Group is committed to designing and implementing a comprehensive Health and Safety management system which identifies legal compliance requirements and risks and delivers mitigations in a consistent, effective and transparent manner following the principles of ISO 45001:2018 standard. We provide safe and healthy working conditions to prevent work-related accidents, injuries and ill health. We define strategies that promote a culture of incident prevention and health promotion. H&S is discussed with employee representatives at different levels: EWC, National Workers Councils and specific Country Health and Safety Committees (where legally applicable), and in other countries (as best practice).	8.8
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Colt Group's H&S management system is designed to meet the requirements of ISO 45001:2018 integrated with our environmental management system on ISO 14001:2015. General HSE Procedures have a global version in English, as it is the global company-wide language. Specific local procedures are written in local languages.	8.8
	403-2 Hazard identification, risk assessment, and incident investigation	A risk assessment procedure has been developed as part of our OHSMS. Due to the complexities of Colt's countries of operation and local legislative demands, some risk assessments are conducted by specialised service providers and in other situations several templates are available for use by Colt staff. H&S assessments focus on the identification of existing and reasonably foreseeable hazards. Those hazards are then quantified to establish a level of risk which in turn promotes consideration of an appropriate control measure. Any finding is reported through the OHSMS management review mechanisms and used to continually improve our system. The Colt Group generic assessments for Technical and Office activities are managed through the Colt HS&E support structure. Internal audits are done periodically to ensure and verify our OHSMS implementation. Any Colt Group employee receives the corresponding H&S training in accordance with the competency needed for their involvement on the OHSMS. Hazardous substances risks are also considered and a specific process exist for the use, storage and disposal of hazardous substances. Internal audits and site inspections are performed periodically to ensure and verify our OHSMS implementation. Employees are provided with necessary Personal Protective Equipment (PPE) in accordance with their risk assessment.	8.8

Occupational health and safety (continued)	Disclosure	Location/Direct answer	SDG
GRI 403: Occupational Health and Safety 2018	403-5 Worker training on occupational health and safety	A training matrix exists as part of our OHSMS training procedure. It includes: A compulsory training programme for new joiners in accordance with country regulations and a global set of H&S modules where no specific requirements are set. These modules are: Understanding Health and Safety, Reporting H&S Incidents, and Lifting and Carrying and Fire Safety. Also an online tool provides training and includes a self-assessment questionnaire on their own workplace to all the employees using display screen equipment. Applicable to operational staff: Staying Safe on the Road, Working at Heights, Hazardous Substances, Stress Management, Asbestos Awareness and Behavioural Safety. Applicable to specific groups: formal safety qualifications for HS&E teams, Fire Warden and First Aiders training, trade training for engineering staff to maintain relevant legislative compliance and specific risks training for site managers. Subcontractors are contractually requested to comply with the applicable legal H&S regulations as employers. In some countries proof of H&S training provision is requested of subcontractors. Contractors are required to complete mandatory H&S training provided by Colt Group. In addition, health and safety training materials are given and different awareness activities are done as part of the H&S management of third parties, especially for the riskiest activities when working at Colt Group sites.	8.8
	403-6 Promotion of worker health	**Employee wellbeing**. **Health and Safety**. As a company, it's our job to look after our employees. Taking care of our employees and their well-being means they'll be more engaged, more productive, able to bring their full selves to work and be less likely to experience burnout. Occupational Health Services (initial and periodical medical check-ups) are offered according to H&S legal requirements in various countries.	3.8
	403-8 Workers covered by an occupational health and safety management system	100%. All employees are covered by a H&S Management system. Some by one fully aligned to ISO 45001 standard and others by one in accordance with local legal requirements. This also covers the workers of 3rd parties working at workplaces controlled by Colt.	8.8
	403-9 Work-related injuries	**Health and Safety**. Partial omission: We do not have data available for workers who are not employees but whose work and/or workplace is controlled by the organisation. We will work for improving data gathering in our next annual report. For work-related hazards requirements, please refer to disclosure '403-2 Hazard identification, risk assessment, and incident investigation'.	8.8

Occupational health and safety (continued)	Disclosure	Location/Direct answer				SDG
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries (continued)	Colt Group work-related injuries.				8.8

		2021	**2022**	**2023**
Total hours worked		**9,102,109**	**9,097,815**	**9,226,602**
Injuries	Number of recordable work-related injuries	2	3	3
	Rate of recordable work-related injuries (x 1,000,000)	0.2197	0.3297	0.3251
Fatalities	Number of fatalities as a result of work-related injury	0	0	0
	Rate of fatalities as a result of work-related injury (x 1,000,000)	0	0	0

Occupational health and safety (continued)	Disclosure	Location/Direct answer	SDG
	403-10 Work-related ill health	**Health and Safety**.	8.8

Partial omission: We do not have data available for workers who are not employees but whose work and/or workplace is controlled by the organisation. We will work for improving data gathering in next annual report

For work-related hazards requirements, please refer to disclosure '403-2 Hazard identification, risk assessment, and incident investigation'.

Colt Group work-related ill health.

		2021	**2022**	**2023**
Fatalities	Number of fatalities as a result of work-related ill health.	0	0	0
	Rate of fatalities as a result of work-related ill health (x 1,000,000)	0	0	0

Training and education	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Learning and development**. **Our material topics and how we manage them**.	4.4
	404-1 Average hours of training per year per employee	**Learning and development**.	4.4
		Omission: Information unavailable/incomplete.	

Training and education (continued)	Disclosure	Location/Direct answer	SDG
GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	**Learning and development**. **Employee wellbeing**.	4.4

	2021		2022		2023	
	Colt Group Employees	**Colt Group employees - New joiners**	**Colt Group Employees**	**Colt Group employees - New joiners**	**Colt Group Employees**	**Colt Group employees - New joiners**
Business Continuity	99.2%	94.9%	98.2%	89.5%	99.3%	95.7%
Conscious inclusion at Colt	NA	NA	98.5%	91.6%	99.5%	98.2%
Prevention of Sexual Harassment in Workplace (PoSh)	99.8%	93.2%	98.4%	90.7%	99.8%	97.7%
Security Awareness at Colt	99.1%	96.4%	97.7%	90.9%	98.7%	98.2%
Code of Conduct	98.6%	94.5%	97.7%	89.4%	99.3%	97.5%
Data Protection	98.4%	91.8%	98.3%	87.4%	99.4%	99.0%
Brand and Vision training (only Core)	NA	NA	97.0%	84.0%	-	97.5%
Health And Safety	NA	92.4%	NA	88.3%	-	97.2%
Action on Environmental Sustainability	-	-	-	-	99.7%	98.0%

Diversity and equal opportunity	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Diversity, Equity and Inclusion**. **Our material topics and how we manage them**. The Colt Code of Conduct outlines the standards of conduct that we hold our employees, suppliers and customers to account. It provides contact details for the Corporate Compliance Committee and the Business Ethics Line, which can be used to raise potential violations of the Code of Conduct, including discrimination and harassment issues. Our global reward principles are committed to ensuring our pay practices support consistent and fair decisions regardless of any protected characteristics. We currently produce and monitor the gender pay gap in some countries, and annually monitor base pay and bonus decisions through a gender lens during our global pay review process. In addition, we are currently reviewing the principles of the EU Pay Transparency Directive ahead of 2026 to look for new opportunities to add to our principles and approach globally. In 2023, Colt's UK overall mean gender pay gap for hourly pay was 8%. This is a 1% improvement compared to 2022 and is due to better female representation in the upper pay quartile of the organisation. The median bonus gap increased slightly by 1% and the mean bonus gap reduced by 6%. You can read the full details in the **2023 UK Pay Gap Report**. In Spain, Barcelona Shared Service Centre's salary gap in 2023 was 3.11% (compared to 2.64% in 2022) and for Colt Spain it was 7.73% (compared to 11.67% in 2022, which is almost 4% improvement year on year). The Gender Equality Commission in Colt Spain continues to work on closing the pay gap, attracting female candidates to mostly male dominated roles or promoting gender neutral language among other initiatives. Colt in Spain has renewed the commitment of Diversity Charter through Fundación Diversidad in Spain. Diversity Charter is an initiative of the EU Commission, it is a public pledge to promote diversity and equal opportunities for its staff and contribute to creating inclusive practices along with customers, suppliers and partners.	5.5 8.5 10.2 10.3 16.7

Diversity and equal opportunity (continued)	Disclosure	Location/Direct answer	SDG
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	**Diversity, Equity and Inclusion**. **Responsible business practices**. Partial omission: Information incomplete due to confidentiality reasons.	5.5 8.5 10.2 10.3 16.7

Local communities	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Community involvement**. **Our material topics and how we manage them**.	4.a
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	**Community involvement**.	4.a

Supplier social assessment	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Collaboration**. **Our material topics and how we manage them**.	8.7 8.8 10.3 12.6
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	**Collaboration**.	8.7 8.8 10.3 12.6

Customer privacy	Disclosure	Location/Direct answer	SDG
GRI 3: Material Topics 2021	3-3 Management of material topics	**Data privacy and cybersecurity**. **Our material topics and how we manage them**. **Data Privacy information**.	16.6
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Omission: Confidentiality constraints.	16.6

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