

# 2025 ESG REPORT



# GENERAL DISCLOSURES

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# GENERAL DISCLOSURES



## BASIS FOR PREPARATION OF THIS REPORT

(BP-1, BP-2; GRI 2-1 to 2-5)

### REPORTING PURPOSE, FREQUENCY AND PERIOD

This report includes Global Switch's Sustainability Statement, it is annual and covers the financial year from 1 January to 31 December 2025.

### CURRENCY, UNITS AND ROUNDING CONVENTIONS

All monetary values are expressed in pounds sterling (GBP). Physical quantities are reported in metric units. Figures are rounded to reflect data-quality confidence and materiality; immaterial differences may therefore appear in accumulated totals.

### LEGAL NAME AND OWNERSHIP

Global Switch Holdings Limited is a private limited company registered in the British Virgin Islands (BVI), company No. 1468649. The Company's shareholders are Elegant Jubilee Limited (51%), Strategic IDC Limited (24.99%) and Tough Expert Limited (24.01%); the controlling shareholder is Jiangsu Shagang Group Co. Ltd, which indirectly owns 51.7% of the Company. Global Switch is privately owned and not listed on any stock exchange. Corporate office: 2nd Floor, Nova North, 11 Bressenden Place, London SW1E 5BY, United Kingdom. Local commercial offices are maintained on each campus to support operations and customers.

### CONSOLIDATION BOUNDARY

Unless otherwise stated, the data is presented consolidated at Group level and relates to assets under Global Switch Group's (Global Switch) operational control, comprising data centre campuses and corporate offices in Amsterdam, Frankfurt, Hong Kong, London, Madrid, Paris and Singapore. The consolidation and reporting boundary matches that of the financial statements.

## VALUE-CHAIN COVERAGE

Disclosures extend beyond own operations to include:

**Upstream:** supply chain activities (e.g., construction materials, equipment).

**Downstream:** impacts associated with customer colocation and connectivity services, including end of life emissions of customers' ICT equipment, where managed by Global Switch.

## REPORTING FRAMEWORKS APPLIED

The primary basis of preparation is the **EU Corporate Sustainability Reporting Directive (CSRD)** and the amended/simplified **European Sustainability Reporting Standards (ESRS)** which Global Switch has voluntarily adopted for Financial Year 2025. The report is also aligned to the **GRI Standards 2021** and **SASB**.

## USE OF RELIEFS AND PHASE-IN PROVISIONS BY THE CSRD ESRS

Global Switch is not currently using any reporting reliefs or phase-in provisions for the information disclosed in this report. It has reported fully as far as possible without incurring disproportionate costs for gathering the information for disclosure.

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### COMPARABILITY WITH PRIOR REPORTING AND RESTATEMENTS

There are no significant structural changes or methodology shifts relative to the 2024 report. Any minor changes in the approach are described in the relevant sections' Accounting Principles paragraphs.

### ESTIMATION TECHNIQUES AND UNCERTAINTY

Where primary data was unavailable, estimation methods consistent with recognised guidance (e.g., spend-based Scope 3 models) were applied. Detailed accounting principles and key assumptions are disclosed in the relevant topical sections; known sources of uncertainty are flagged alongside each metric.

### EXTERNAL ASSURANCE

In Q1 and Q2 2026, Global Switch engaged independent assurance specialists to conduct a **limited assurance** engagement over our **2025 Scope 1, Scope 2 and Scope 3** carbon-emissions data. The engagement covered the full boundary of the Global Switch Group's operationally controlled sites and value-chain emissions methodologies.

The assurance report concluded that, based on the procedures performed, nothing has come to the attention of the assurance team to indicate that the 2025 Scope 1, 2 and 3 greenhouse-gas emissions data is materially misstated.

Assurance statements appear in Appendix – Verification Statements.

### CONTACT POINT

Enquiries regarding this report should be directed to **esg@globalswitch.com**

The restatements presented below did not have a material impact on prior reporting periods.

METRIC	2024 VALUE REPORTED	2024 VALUE RESTATED	REASON FOR THE RESTATEMENT
<b>2023 _Total GHG emissions</b> (location-based) in tCO2e per £m revenue	826	955	2023 figures have been restated to correct a calculation error identified during the current reporting period.
<b>2023 _Total GHG emissions</b> (market-based) per £m revenue	214	247	2023 figures have been restated to correct a calculation error identified during the current reporting period.
<b>End-of-life waste</b>	<u>Ref to the pages 56-57</u>	<u>Ref to the pages 56-57</u>	2023 and 2024 figures have been restated to reflect improved data completeness and methodological refinement identified during the 2025 reporting period.

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# LETTER FROM THE CEO AND THE COO



**Ashley Muldoon**  
Chief Executive Officer

As we reflect on 2025, it is clear that Global Switch is operating at a defining moment for digital infrastructure. The technologies once considered emerging have become foundational. Artificial intelligence (AI), high-performance computing (HPC) and data rich enterprise applications are transforming how our customers design, deploy and scale their digital environments. What has not changed is our commitment to doing business responsibly, and to ensuring that the infrastructure underpinning this latest digital revolution is delivered with care for people, communities and the planet.

Sustainability matters to us not only because it is the right thing to do, but because it is central to the resilience of mission-critical assets and our sector as a whole. As a global data centre operator, we have a unique opportunity to **facilitate a sustainable, technology enabled world**, where digital innovation can advance without compromising environmental or social wellbeing.



**Peter Domeney**  
Chief Operating Officer

In 2025, our teams delivered strong progress. We improved our Group-wide Power Usage Effectiveness (PUE) by 8% year-on-year and operated on **88.3% renewables-backed electricity procured globally, with 100% across Europe and in Singapore**. Global Switch also acted on water efficiency, significantly reducing our Water Usage Effectiveness (WUE) in Paris from 3.2 to 2.0 by removing the final cooling towers and replacing them with a more efficient plant.

We continued to work towards our approved **science-based targets (SBTs)** for emissions reductions, secured a new **Power Purchase Agreement (PPA) with RWE**, and expanded our liquid-cooled capacity in London, Paris and Hong Kong to support the next, most demanding generation of high-density AI and HPC workloads. We also strengthened our circular economy contributions through initiatives such as a heat recovery agreement at our Paris data centre, allowing captured heat to be reused by local community infrastructure, demonstrating the positive role data centres can play in urban sustainability.

Our people and culture remain fundamental to our progress. In 2025, we recorded **zero employee accidents**, achieved **100% performance review participation**, and expanded development opportunities through new engagement platforms and global wellbeing programmes, including the Thrive Wellbeing Workshop Series delivered with MYNDUP. We strengthened our human rights and governance foundations, rolling out Modern Slavery training, achieving 90% cybersecurity training

completion, and launching an independent, 24/7 multilingual whistleblowing channel. We were also pleased to be awarded an **EcoVadis Gold Medal**, placing us in the top 5% of businesses worldwide for our ESG policies and performance.

Yet, 2025 was not without its challenges. Demand for AI and HPC capacity intensified at a pace not seen before, driving increased power utilisation across our portfolio. This meant that, despite efficiency gains, our **absolute carbon emissions increased**, reflecting a global reality of the consequences of digital growth. At the same time, **grid constraints in core Tier 1 markets**, planning restrictions and extended delivery timelines required us to work even more creatively to secure sustainable power for our campuses. Expanding responsibly also meant considering the embodied carbon implications of development, navigating rising expectations under the changing EU Corporate Sustainability Reporting Directive (CSRD) and Energy Efficiency Directive, and strengthening due diligence across a complex global supply chain.

Renewable electricity procurement reached 88.3% globally, with electricity in Europe and Singapore sourced 100% from renewables-backed supply.

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We view these challenges as catalysts for accelerated action. Our forward priorities directly address them, as we find new routes to efficiency and sustainability across our operations. To counter increases in absolute emissions and alleviate grid strain, we will further scale renewable energy procurement – expanding the role of PPAs that not only secure additional renewable generation but enhance energy security for our customers. We will continue to invest in energy efficiency upgrades and liquid cooling solutions that increase compute density while minimising environmental impact. We are deepening **oversight of WUE** as water stewardship becomes increasingly material in high-density cooling environments. To address the carbon footprint of backup generation, we are also transitioning to **sustainable HVO fuel** as a near-term step while we pursue long-term pathways to cleaner backup technologies.

To meet rising regulatory and societal expectations, we are reinforcing governance and independent assurance, enhancing ESG controls, and embedding stronger data, climate and human rights risk management across all regions. Our adoption of CSRD ahead of time reflects our commitment to leadership in reporting and accountability. To strengthen supply chain integrity, we are intensifying engagement with suppliers on SBT alignment, ESG screening and ongoing monitoring. This includes deeper due diligence, clearer expectations on labour standards and ethics, and closer collaboration to reduce material-related emissions and waste. Finally, to maintain a safe, inclusive workplace as we continue to scale, we are evolving our health and safety management with the ambition of a **Zero Harm culture**, expanding global development programmes

and supporting the wellbeing of every colleague through strengthened systems, communications and engagement platforms.

Our mission remains constant: **to provide secure, scalable and responsible infrastructure that powers the world's leading enterprises and innovators**. The progress we have made – supported by the dedication of our people, the trust of our customers and partners, and the oversight of our empowered ESG Steering Group – gives us confidence in the path ahead. As we move into 2026 and beyond, we do so with a clear strategy, a strengthened governance foundation and a deep sense of responsibility for the critical role we play in society.



**Ashley Muldoon**  
Chief Executive Officer

**Peter Domeney**  
Chief Operating Officer

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# OUR ESG 2025 HIGHLIGHTS



## 01

### TAKING CLIMATE ACTION

**Renewables:**

100% renewables-backed electricity procured in Europe and Singapore, 88.3% for our facilities globally

**Data centre energy efficiency:**

8% year-on-year PUE improvement of our Group-wide operational average

## 02

### ENERGISING OUR HUMAN CAPITAL

**Occupational health and safety:**

0 employee accidents

**Diversity in management:**

19% female leaders in senior and line management positions

**Diversity in our people:**

29% female employees

**Career and development:**

100% of our employees participated in reviews globally

## 03

### ENGAGING IN HIGH IMPACT COMMUNITY ACTION

**Community events:**

Our people organised and participated in 14 events across our 7 locations globally

**Community volunteering:**

More than doubled our volunteering hours in 2025

## 04

### JOINING FORCES WITH THE INDUSTRY

**Participation in industry bodies:**

12 of our business leaders are members of their local data centre and industry associations

**Participation in industry events:**

Our people represented Global Switch at more than 48 industry events

## 05

### INVESTING IN TRANSPARENCY

**Human rights training:**

Launched training on the prevention of Modern Slavery to all employees globally

**Cybersecurity score:**

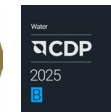
Achieved the Centre for Internet Security IG2- Enhanced Security score

**Cybersecurity training:**

Reached a 90% completion rate for Cyber Security training globally

**ESG ratings:**

Received an EcoVadis Gold medal for the first time; Improved our CDP Water score (B) and maintained our CDP Climate score (C)



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# GLOBAL SWITCH AT A GLANCE

(SBM-1; GRI 2-6)

## OUR PRESENCE AND ESG CERTIFICATIONS



London

**Campus** North, East & South  
**Gross floor area** 116,881 m<sup>2</sup>  
**Status** Existing & expansion  
**Certifications** ◆◆◆◆◆◆◆◆◆◆



Amsterdam

**Campus** West & East  
**Gross floor area** 68,533 m<sup>2</sup>  
**Status** Existing & expansion  
**Certifications** ◆◆◆◆◆◆◆◆◆◆

**Green Building certifications**  
**Amsterdam West** ●  
 BREEAM Very Good  
 (Hall 4 – 1,176 m<sup>2</sup>)



Frankfurt

**Campus** North & South  
**Gross floor area** 30,160 m<sup>2</sup>  
**Status** Existing & expansion  
**Certifications** ◆◆◆◆◆◆◆◆◆◆



Paris

**Campus** East & West  
**Gross floor area** 50,694 m<sup>2</sup>  
**Status** Existing & expansion  
**Certifications** ◆◆◆◆◆◆◆◆◆◆



Madrid

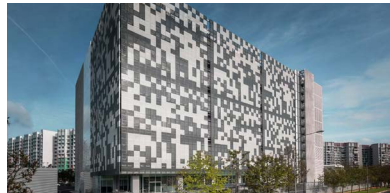
**Campus** Madrid  
**Gross floor area** 21,676 m<sup>2</sup>  
**Status** Existing & expansion  
**Certifications** ◆◆◆◆◆◆◆◆◆◆



Hong Kong

**Campus** Tseung Kwan O  
**Gross floor area** 69,879 m<sup>2</sup>  
**Status** Existing  
**Certifications** ◆◆◆◆◆◆◆◆◆◆

**Green Building certifications** ●  
 BEAM Gold, LEED Platinum  
 (Phase 1 – Building 1&2, 22,574 m<sup>2</sup>)



Singapore

**Campus** Woodlands  
**Gross floor area** 23,946 m<sup>2</sup>  
**Status** Existing  
**Certifications** ◆◆◆◆◆◆◆◆◆◆

**Green Building certifications** ●  
 Green Mark Platinum



Singapore

**Campus** Tai Seng  
**Gross floor area** 28,730 m<sup>2</sup>  
**Status** Existing  
**Certifications** ◆◆◆◆◆◆◆◆◆◆

**Portfolio total:** 410,499 m<sup>2</sup> of gross floor area (existing and developments/expansions currently in progress) across eight data centres in seven Tier-1 cities.

**Data Centre Certifications**  
 As of 31 December 2025, Global Switch has the following third-party certifications at its data centre facilities:

- Certifications**
- ◆ ISO 9001 Quality Management Systems
  - ◆ ISO 14001 Environmental Management Systems
  - ◆ ISO 50001 Energy Management Systems
  - ◆ ISO 45001 Health and Safety Management Systems
  - ◆ ISO 27001 Information Security Management Systems
  - ◆ EU Code of Conduct for Energy Efficiency in Data Centres

● 47,696 m<sup>2</sup> certified to Green Building certifications such as BREEAM/LEED, representing ~12% of the Group's total gross floor area (410,499 m<sup>2</sup>)

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## MEMBERSHIPS AND VOLUNTARY COMMITMENTS

(SBM-2; GRI 2-28)

Global Switch actively participates in industry and sustainability-focused bodies that align with its environmental and social commitments. These memberships support benchmarking, knowledge exchange, and collaborative progress on shared ESG challenges. A list of current memberships and voluntary commitments is provided below.

EU Data Centre Association (EUDCA)

EU Carbon Neutral Data Centre Pact

EU Code of Conduct for Energy Efficiency in Data Centres

TechUK

Dutch Datacenter Association

Nederland ICT

Nemo Museum

Eco-Verband der deutschen Internetwirtschaft

Spain Data Centre Association

Asia-Pacific Data Center Association (APDCA) - Founding Member

Federation of Hong Kong Industries

Singapore Green Building Council

Pacific Telecommunications Council

Telecommunications Executive Circle

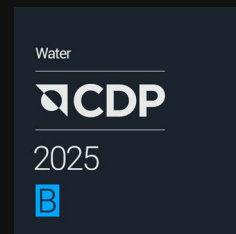
The Netherlands Chamber of Commerce KVK

The Open Compute Project

## EXTERNAL ESG RATINGS AND VOLUNTARY DISCLOSURES

In addition to formal assurance processes, Global Switch voluntarily discloses sustainability-related information via leading ESG ratings platforms including CDP and EcoVadis. Global Switch has achieved the following:

### CDP ratings

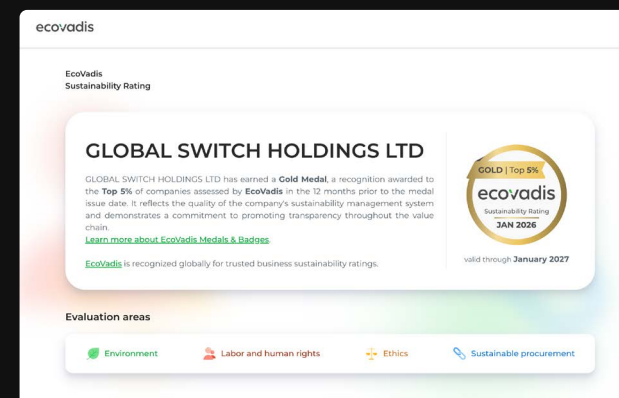


### EcoVadis score



Gold Medal

79/100



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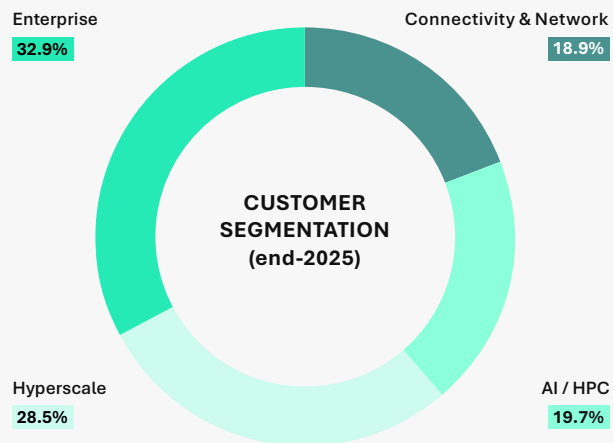
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## STRATEGY, BUSINESS MODEL & VALUE CHAIN

(SBM-1; GRI 2-6, 2-22, 2-23)

### STRATEGY AND BUSINESS MODEL

Our purpose and value proposition are presented in the CEO/COO Letter, which also outlines how Global Switch’s business model draws on key resources and relationships to generate long-term value.



### REVENUE MODEL

1. Retail and wholesale colocation contracts (space + power) – primary driver.
2. Cross-connect and connectivity-ecosystem fees.
3. Remote-hands / smart-hands services.
4. Power resale and sustainability-linked services (renewable energy options).

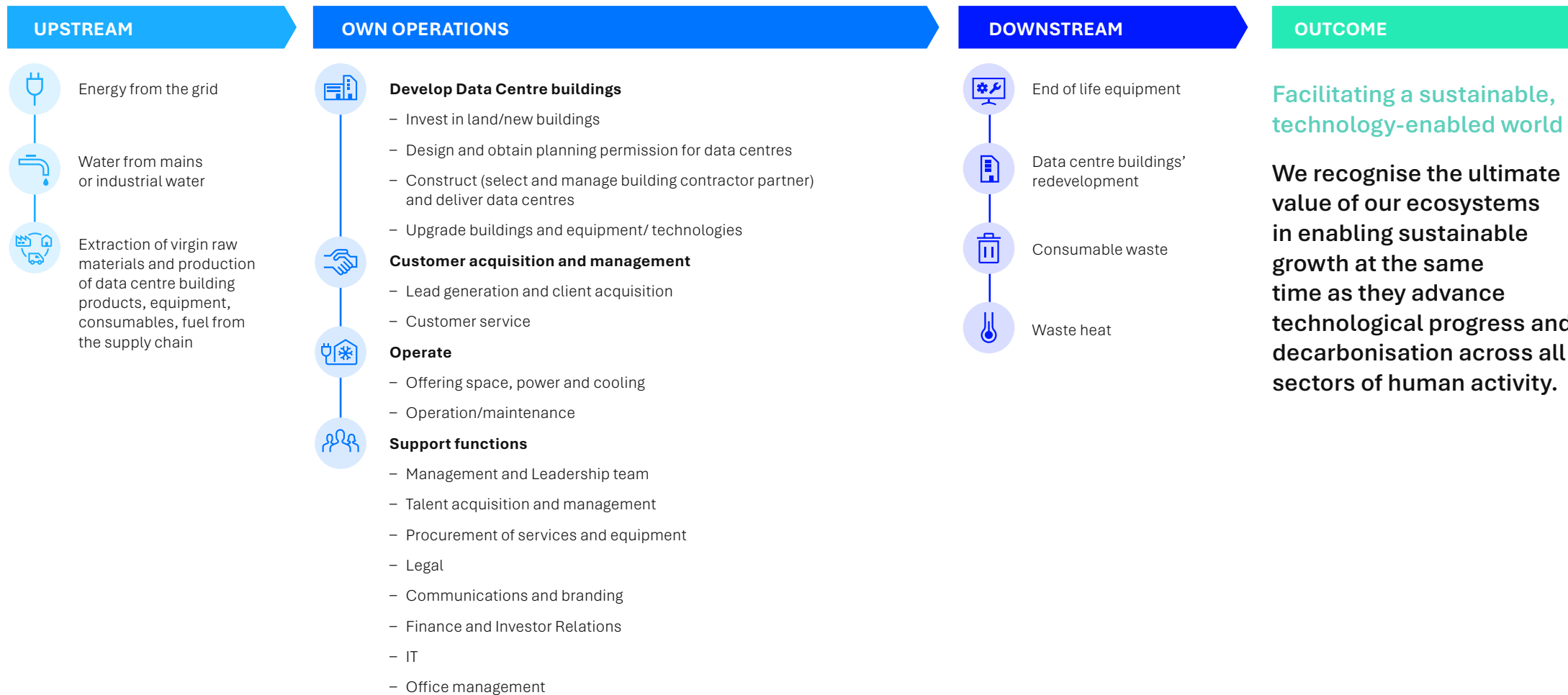
### COST STRUCTURE & KEY DEPENDENCIES

**Principal cost drivers:** electricity (largest operating expense), capital outlays for land, construction materials and mission-critical plants, plus skilled labour for 24/7 operations.

**Critical dependencies:** electricity supply, water availability, raw materials and construction inputs, skilled labour, IT infrastructure reliability, regulatory compliance and permitting, E-waste recyclers and responsible disposal, waste-heat recovery infrastructure, digital-infrastructure interoperability.

The dependencies listed above represent the key resources and relationships on which Global Switch’s business model relies. Detailed management approaches, KPIs and mitigation measures are disclosed in the relevant ESG chapters.

OUR VALUE CHAIN



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## ESG STRATEGY

(SBM-3; GRI 2-23, 2-24, 3-3)

### OUR ESG STRATEGY PILLARS

Against the backdrop of climate change and a rapidly evolving landscape shaped by internet, connectivity and artificial-intelligence advancements - driving higher energy intensity, resource demand and societal reliance on digital infrastructure - Global Switch's ESG strategy is built around five core pillars.

<h1>01</h1> <h2>TAKING CLIMATE ACTION</h2>	<h1>02</h1> <h2>ENERGISING OUR HUMAN CAPITAL</h2>	<h1>03</h1> <h2>ENGAGING IN HIGH IMPACT COMMUNITY ACTION</h2>	<h1>04</h1> <h2>JOINING FORCES WITH THE INDUSTRY</h2>	<h1>05</h1> <h2>INVESTING IN TRANSPARENCY</h2>
<ul style="list-style-type: none"> <li>Climate change</li> <li>Energy</li> <li>Water</li> <li>Circular economy</li> <li>Biodiversity</li> </ul> 	<ul style="list-style-type: none"> <li>Health, safety and wellbeing</li> <li>Learning &amp; Development</li> <li>Diversity &amp; Inclusion</li> </ul> 	<ul style="list-style-type: none"> <li>Investment in communities</li> </ul> 	<ul style="list-style-type: none"> <li>Industry collaboration</li> <li>Value chain engagement</li> </ul> 	<ul style="list-style-type: none"> <li>Corporate governance</li> <li>Human Rights</li> <li>ESG reporting</li> </ul> 

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## MANAGEMENT OF MATERIAL TOPICS

The five pillars are designed to represent key ESG topics that are material to Global Switch, where we develop policies, actions and targets that support the Sustainable Development Goals.

More specifically, we are committed to taking climate action through robust decarbonisation policies and SBTi-approved science-based targets, climate adaptation measures to mitigate impacts and climate related business risks, water efficiency and biodiversity enhancement steps, while working towards a circular economy and responsible resource management.

By energising our human capital and engaging in high-impact community action, Global Switch upholds clear policy commitments to a safe, fair and inclusive workplace, and to supporting communities affected by the impacts of technological and climate change. By joining forces with the industry and investing in transparency, Global Switch strengthens governance, enhances disclosure practices, and advances collaborative solutions.

We embed policy commitments for responsible business conduct for our key impacts, risks and opportunities throughout our activities, and business relationships through stakeholder engagement, including training where relevant, alongside due diligence steps. This includes due diligence in relation to Human Rights (see also paragraph below), as shown in the relevant ESG chapters and mapped in our **Sustainability Due Diligence** section.

When setting commitments, Global Switch follows the precautionary principle by taking early action to prevent possible environmental and social harm, even when all the risks are not yet fully understood. See our Policy Overview section for more information on the content, governance and alignment with intergovernmental instruments. Through our commitments, policies and actions we aim to ensure we responsibly address the environmental, social and economic implications of digital growth for people, the natural environment and the business. See the relevant ESG chapters in this report for more information on the interaction of material impacts, risks and opportunities with strategy, as well as in relation to financial effects and the business model.

## HUMAN RIGHTS COMMITMENTS

Our human rights commitments, which apply to our operations and value chain, are aligned with several third-party standards, including the International Bill of Human Rights, the OECD Guidelines for Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights, the UN Declaration of Human Rights and the Convention on the Rights of the Child, ILO Conventions, and applicable laws and regulations.

Our Code of Conduct and our Supplier Code of Conduct encompass personal conduct, workplace safety and environment, conflicts of interest, confidential information, data privacy and ethics, any form of human rights breaches such as any form of discrimination and harassment, freedom of association and collective bargaining, and the

fight against unfair business practices such as corruption, bribery, fraud, insider trading, taxation, as well as environmental responsibility.

The Human Rights Commitments were approved by the highest governance body of the business in July 2025. See also our Policy Overview table for policies relating to Human Rights regarding our employees and value chains. Global Switch did not have a standalone overarching human rights policy in 2025; however, key human rights related principles were embedded across existing policies including the Code of Conduct, Anti Bribery and Corruption Policy, Whistleblowing Policy, and Supplier Code of Conduct, with a dedicated overarching human rights policy statement planned for completion in 2026.

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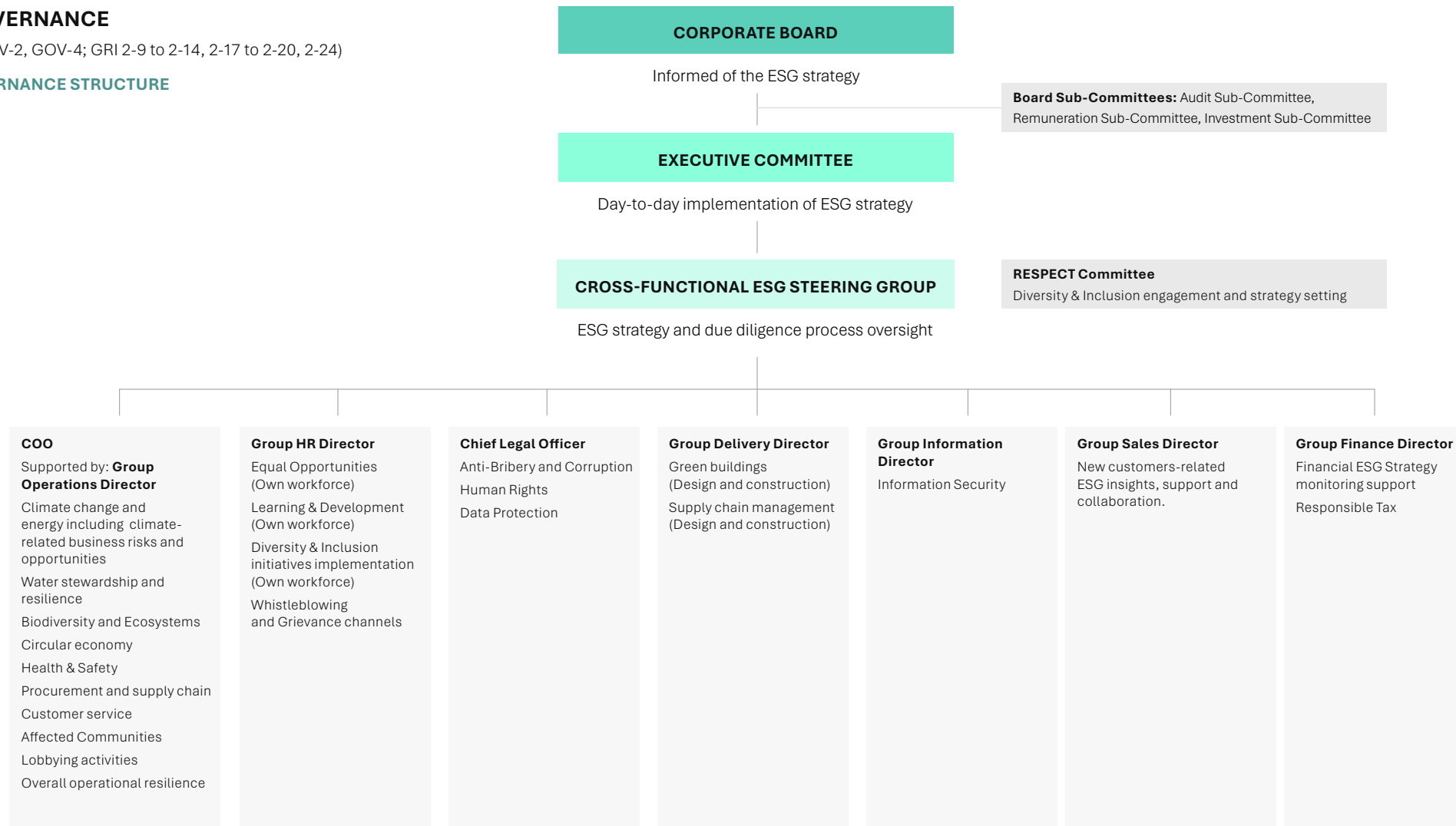
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## ESG GOVERNANCE

(GOV-1, GOV-2, GOV-4; GRI 2-9 to 2-14, 2-17 to 2-20, 2-24)

### ESG GOVERNANCE STRUCTURE



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**Highest corporate governance body:**

Global Switch's seven-member Board combines executive insight with independent oversight. Two Directors are appointed by the majority shareholder, one by each minority shareholder, and the CEO, CFO and an Independent Director complete the Board. The Board is chaired by a Non-Executive Chairman, the CEO and CFO are Executive Directors who manage the Group on a day-to-day basis, and all the other Directors are non-Executive directors.

Three sub-committees enable deeper scrutiny: an Audit Sub-Committee chaired by the Independent Director, a Remuneration Sub-Committee that sets Group-wide pay principles, and an Investment Sub-Committee that allows the three Shagang-nominated Directors to approve customer contracts and Capex/Opex within Board-delegated limits.

The Board meets quarterly and is informed of ESG matters at least annually. The Board currently includes professionals with finance, data centre operations, technology and international business backgrounds. The Board has ESG briefings delivered by the ESG Team regarding current and emerging regulatory requirements and market expectations. One of seven Directors is female (14%). The representative Director of each of our three shareholders is selected by the relevant shareholder; the CFO and CEO are selected by the majority shareholder. Collectively the Board offers expertise in finance, hyperscale data centre operations and international markets.

Subsequent to the reporting period, and as announced on 16 February 2026, the Group's Chief Financial Officer and Executive Director, David Doyle, retired after more than 11 years of service. Responsibilities for the finance, tax and treasury functions will continue to be managed by the Group Director Finance and Group Director Tax and Treasury, reporting directly to the Chief Executive Officer, until a replacement is appointed. These changes do not impact the ESG metrics reported for the year but are relevant to the Group's governance and oversight framework. Further details on Board composition, roles and governance are provided in the Governance section of Global Switch's Annual Report.

**ESG highest governance body:**

The ESG Leadership Steering Group through its members is collectively the highest governance body for ESG. The ESG Leadership Steering Group, which is chaired by the ESG Team, consists of: the COO, who represents the Board, and senior leaders from HR, Operations, Engineering, Procurement, Legal, Commercial and Finance.

The ESG Steering Group sets the ESG Strategy: meeting at least every two months, considers the latest ESG double materiality assessment (DMA) results, including due diligence findings, any legislative or other requirements that may significantly impact the business, as well as the progress made in the ESG strategy through monitoring ESG KPIs. It sets and adjusts ESG policies, objectives and targets, allocates resources

including any training needed, oversees preparation of the annual ESG Report and approves its contents. The DMA is refreshed annually, synchronised with the objectives and target-setting cycle. This ensures that new impacts, risks or opportunities enter the register promptly and that mitigation progress is reflected in both financial planning and public reporting.

The ESG Steering Group is facilitated by the Group ESG Consultant who brings expertise as well as guides and enables function leaders on the double materiality assessment, ESG strategy setting, implementation, internal monitoring and external reporting. The ESG Steering Group also has access to Subject Matter Experts, including in the areas of Environment, Energy Management, Information Security and Physical Security.

A separate RESPECT Committee - an employee forum spanning regions and levels - advises on diversity, equity, inclusion and belonging initiatives. Its representative attends the ESG Steering Group as required, ensuring the relevant topics feed directly into executive decision-making.

**Day-to-day implementation of ESG policies and actions:**

Execution rests with the Executive Committee (CEO, CFO, COO, CCO, CLO and Group Directors). The Executive Committee meets weekly and holds a formal management review each month.

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## ESG REPORTING RISK MANAGEMENT

Global Switch maintains internal controls in relation to ESG information and reporting. These include:

The progress of the ESG Strategy is monitored using relevant KPIs and information from the cross-functional teams and facility operations teams. The information and KPI data is held within databases and platforms which act as the single source of truth for those data points.

The data and information that are collected for internal and external ESG reporting purposes are validated through liaising with the relevant data custodians internally or externally. The validation includes collection by reviewing of primary evidence and raw data sets.

The business operates third-party certified management systems, which are externally audited in the areas of Environmental, Energy, Occupational Health and Safety, and Information Security management.

Scope 1-3 GHG data receives third-party limited assurance.

Global Operations collate monthly KPI and issue reporting which is held in the internal business Dashboard. These are reviewed at the Quarterly MD and Operations Directors Quarterly Leadership meetings.

Corporate policies have a named owner and a Sponsor at Executive Committee level. They are reviewed periodically to ensure their validity and completeness.

The ESG Steering Group oversees the Double Materiality Assessment, which was refreshed in 2025.

Channels for reporting concerns are provided and monitored by Global Switch. Any business ethics or human rights incidents and employee grievances are investigated and remediated under the Whistleblowing and Grievance policies.

Any Health and Safety or Environmental incidents were reported and investigated through the business' AIR (Accident and Incident Reporting) system.

The Legal, Finance and ESG teams monitor developments in CSRD/ESRS, UK Sustainability Disclosure Standards, the International Financial Reporting Standard (IFRS) Sustainability Disclosure Standards and related frameworks, and planning gap closures for the following ESG Strategy planning and reporting cycle.

The COO and the ESG Steering Group members approve the content of the ESG disclosures.

Further information on the sources and controls of information and metrics disclosed is provided within the relevant ESG chapters of this report and within the Accounting Principles paragraphs of each of their sections.

## INTEGRATION OF SUSTAINABILITY INTO INCENTIVE SCHEMES

Remuneration is governed by the Board's Remuneration Sub-Committee. From 2025, the remuneration of all C-suite members as well as for key Operations roles is linked to ESG KPIs specifically relating to the Power Utilisation Effectiveness (PUE) of the data centres.

It is a ratio that describes how efficiently a computer data centre uses energy. More specifically, it is the ratio of the total power used at the data centre to the energy amount delivered to the IT equipment in the data centre. PUE represents the energy efficiency of the operation of the data centre.

This is important for the decarbonisation of the business as energy efficiency reduces the energy demand and energy footprint and strain on the electricity grid. The target is defined as a percentage reduction in PUE on a year-on-year basis, calculated over a 12-month period. This is one of a total of eight monetary incentives. The percent this represents in monetary incentives ranges from 5-10% of the bonus in the Long -Term Incentive Plan depending on the role of the individual.

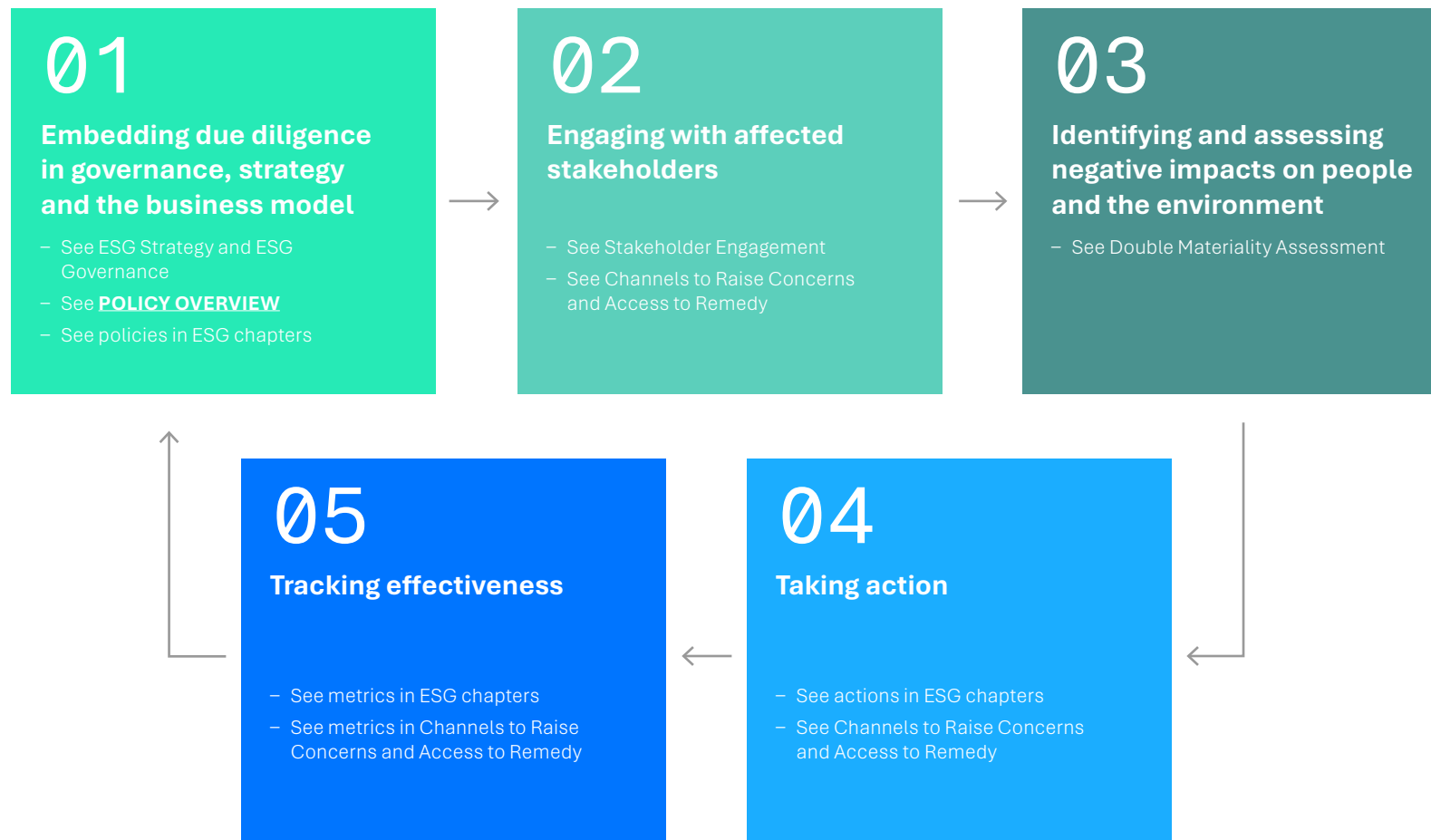
## SUSTAINABILITY DUE DILIGENCE

(IRO-1, GOV-3; GRI 2-23, 2-25, 2-26)

Global Switch, a leading player in the global data centre industry, is committed to sustainability and ethical practices. Informed and guided by the OECD Guidelines, Global Switch applies a sustainability due diligence (SDD) framework that enables us to continuously assess our operations and value chain for potential adverse impacts on people or the environment.

Global Switch operates globally with a worldwide value chain, including some regions facing potential human rights, corruption, and environmental challenges. Thus, we engage our value chain in SDD processes. Our SDD framework closely follows the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the UN Guiding Principles on Business and Human Rights (UNGPs). Our SDD process informs our ESG Strategy and the disclosures, specifically by identifying potential IROs (Impacts, Risks and Opportunities) in our value chain and affected communities as part of our Double Materiality Assessment.

### Map of Sustainability and ESG Due Diligence disclosures in this report



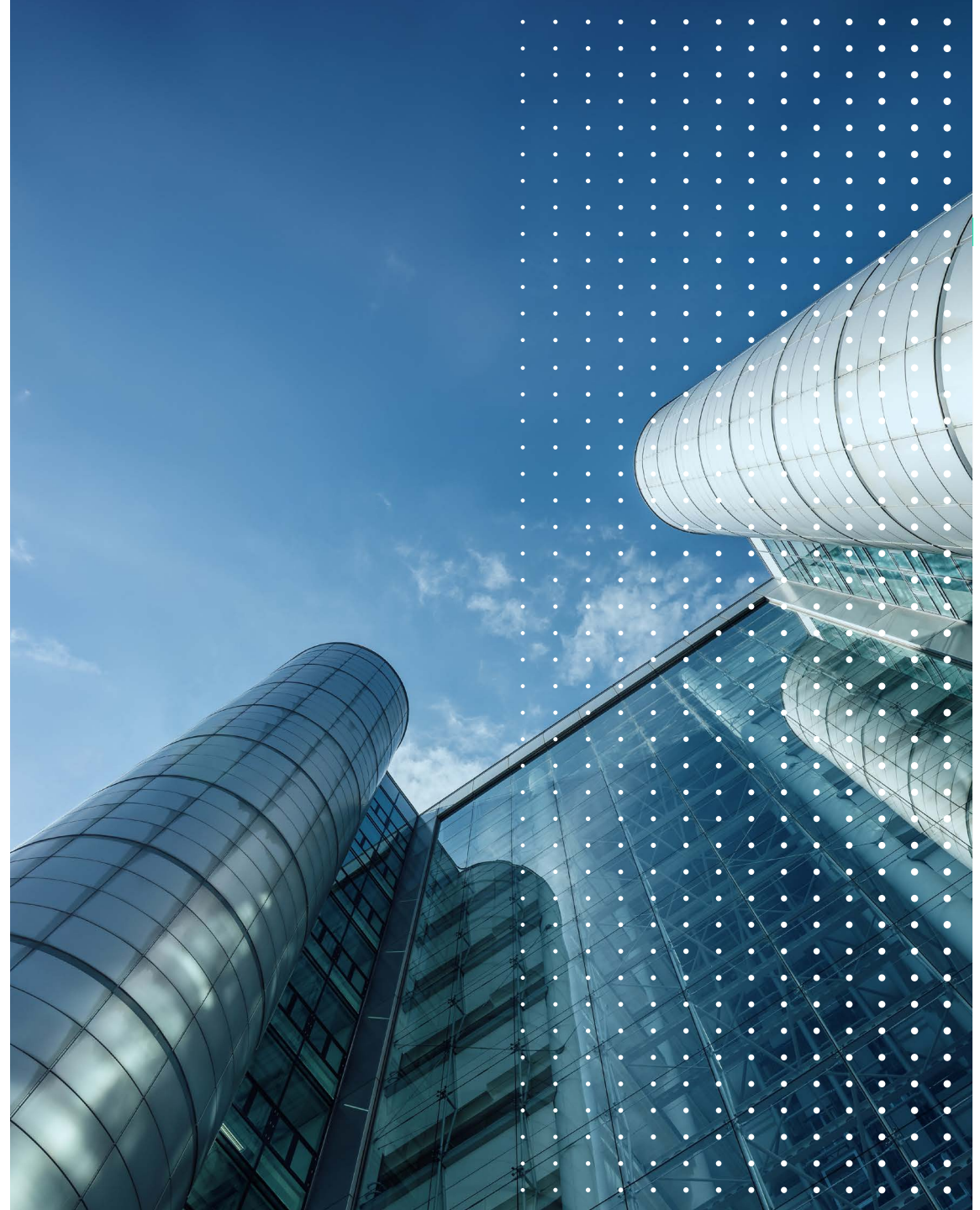
## STAKEHOLDER ENGAGEMENT

(SBM-2, IRO-1c, S1-2, S2-2, S3-2, S4-2; GRI 2-29, 3-3f)

Stakeholder engagement forms a critical input into our business strategy as well as into our Double Materiality Assessment for compiling this report. We have identified, prioritised, and engaged stakeholders based on both the relevance of the sustainability Impacts on them, and their influence over our business outcomes. Our stakeholder mapping includes internal teams, value chain actors, affected communities, regulatory bodies, and silent stakeholders such as future generations and the natural environment.

Engagement methods range from direct consultation (e.g., board meetings, materiality surveys, ESG briefings) to representative forms such as desktop research or industry proxy data for harder-to-reach groups. Specific examples include direct ESG surveys to customers, debt investors, and suppliers; ongoing dialogue with employees; and desktop analysis of regulatory expectations and ecosystem impacts.

Each stakeholder group's input has shaped the determination of material Impacts, Risks, and Opportunities (IROs) and business strategy, particularly in areas such as climate transition risks, responsible supply chain practices, and community impacts. Management responses and KPIs are detailed in the relevant disclosure sections.



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## STAKEHOLDER ENGAGEMENT SUMMARY



STAKEHOLDER GROUP	WHY WE ENGAGE	HOW AND WHEN WE ENGAGE (Annual <sup>1</sup> unless otherwise stated)	HOW AND WHEN WE ENGAGED FOR THE ESG DMA 2025	HOW THE ENGAGEMENT OUTPUTS ARE USED	RELEVANT POLICIES, TARGETS AND ACTIONS ESRs DISCLOSURE SECTION REFERENCE
<b>SHAREHOLDERS</b> <b>Included Parties</b> Equity holders, board-level investor representatives	Secure strategic input, provide oversight.	<ul style="list-style-type: none"> <li>– ESG briefings (ad hoc)</li> <li>– ESG Report</li> </ul>	<ul style="list-style-type: none"> <li>– ESG Briefing to the Shareholder</li> </ul>	ESG strategy development.	SBM-2, SBM-3, IRO-1, GOV-1
<b>INVESTOR COMMUNITY AND FINANCIAL MARKETS</b> <b>Included Parties</b> Debt investors, banks, credit rating agencies, insurers media and industry analysts indirectly via public trust	<ul style="list-style-type: none"> <li>– Climate transition risk metrics</li> <li>– ESG Risk ratings</li> <li>– Green-finance eligibility</li> </ul>	<ul style="list-style-type: none"> <li>– Investor presentations (ad hoc)</li> <li>– Annual Report</li> <li>– ESG Report</li> <li>– Website (ad hoc)</li> <li>– 1-1 engagements (ad hoc)</li> <li>– ESG rating platforms (e.g., CDP, EcoVadis)</li> <li>– ESG-related questionnaires received by investors (ad hoc)</li> </ul>	<ul style="list-style-type: none"> <li>– Disclosures on ESG rating platforms, feedback received</li> <li>– Through desktop research on the ESG KPIs of rating agencies</li> <li>– Through considering the feedback specific to Global Switch received from rating agencies</li> </ul>	Inputs shape the prioritisation of topics for ESG Strategy development, ESG KPIs and the double materiality assessment scoring.	SBM-2, SBM-3, IRO-1
<b>BOARD &amp; EXECUTIVE COMMITTEE</b> <b>Included Parties</b> Senior executives, board of directors	Integrate ESG into corporate strategy; approve risk controls and KPIs.	<ul style="list-style-type: none"> <li>– Board papers (quarterly)</li> <li>– Ad hoc updates by the ESG Steering Group representative</li> <li>– ESG Report</li> </ul>	<ul style="list-style-type: none"> <li>– Board papers</li> <li>– ESG steering group updates</li> <li>– Strategic ESG validation discussions</li> </ul>	Outputs guide corporate strategy refresh, risk appetite, executive incentives and operational ESG targets.	SBM-2, SBM-3, IRO-1, GOV-1, GOV-2
<b>ESG STEERING GROUP</b> <b>Included Parties</b> ESG cross-functional leaders	Development and implementation and progress monitoring of ESG roadmap. Oversight and approval of ESG reporting.	Monthly ESG Steering Group meetings.	<ul style="list-style-type: none"> <li>– Reviewed DMA scoring drafts as refreshed for year 2025</li> </ul>	Steering Group insights direct ESG plan sequencing, resource allocation and ESG performance reporting. Oversight of the ESG due diligence processes.	SBM-2, SBM-3, IRO-1, GOV-1, GOV-3, GOV-4

<sup>1</sup>Ad-hoc engagements occur at least annually and more frequently, as required.

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STAKEHOLDER GROUP	WHY WE ENGAGE	HOW AND WHEN WE ENGAGE (Annual <sup>1</sup> unless otherwise stated)	HOW AND WHEN WE ENGAGED FOR THE ESG DMA 2025	HOW THE ENGAGEMENT OUTPUTS ARE USED	RELEVANT POLICIES, TARGETS AND ACTIONS ESRS DISCLOSURE SECTION REFERENCE
<p><b>EMPLOYEES / STAFF AND ADVISORS</b></p> <p><b>Included Parties</b> Facility staff, development team, engineers, operations team, commercial, marketing and communications, IT, HR, procurement, finance, legal, sales and customer teams, internal audit, ESG specialist staff, ISO auditors</p>	<p>Capture workforce perspectives on material ESG issues; foster engagement and DEI.</p>	<ul style="list-style-type: none"> <li>- Performance and career reviews</li> <li>- Staff induction (ad hoc)</li> <li>- RESPECT Committee (ad hoc)</li> <li>- Work councils</li> <li>- Staff engagement survey</li> <li>- Local and Group-wide Townhalls (ad hoc)</li> <li>- Women of Global Switch forum (ad hoc)</li> <li>- Myndup workshops and information sessions (ad hoc)</li> <li>- Direct line manager input and HR business partnering (ad hoc)</li> <li>- Grievance mechanisms (ad hoc)</li> <li>- Corporate intranet (Switch) (ad hoc)</li> <li>- Group ESG briefing sessions (ad hoc)</li> <li>- Social media (ad hoc)</li> <li>- ESG Report</li> <li>- Website (ad hoc)</li> </ul>	<ul style="list-style-type: none"> <li>- Staff engagement survey</li> <li>- Grievance mechanisms</li> </ul>	<p>Feedback drives HR-related and DEI programmes, training content, wellbeing initiatives and internal communications.</p>	<p>SBM-2, SBM-3, IRO-1, S1-1 to S1-16</p>
<p><b>CUSTOMERS / PROSPECTIVE CUSTOMERS</b></p> <p><b>Included Parties</b> Customers, prospective customers, brokers</p>	<p>Understand customer / prospective customer ESG expectations, existing customer feedback on Global Switch performance and to maintain competitiveness.</p>	<ul style="list-style-type: none"> <li>- Regular meetings (ad hoc)</li> <li>- ESG Report</li> <li>- ESG rating platforms (CDP, EcoVadis)</li> <li>- ESG-related questionnaires at tender stage (ad hoc)</li> <li>- Industry events (ad hoc)</li> <li>- Website (ad hoc)</li> <li>- Customer support line (ad hoc)</li> <li>- Customer / occupier satisfaction survey</li> </ul>	<ul style="list-style-type: none"> <li>- Through desktop research on the top customers / prospective customers' ESG strategies and performance</li> <li>- Analysis of customer ESG questionnaires and contractual requirements. For 2025 this included: renewable energy sourcing, PUE and WUE targets, circular economy practices and responsible waste management, heat reuse, Health and Safety strategy, certifications and alignment with legislations and international frameworks</li> <li>- Review of any relevant customer feedback received</li> </ul>	<p>Customer inputs shape renewable-energy sourcing, PUE targets, product features and client-facing ESG reporting.</p>	<p>SBM-2, SBM-3, IRO-1, S4</p>

<sup>1</sup>Ad-hoc engagements occur at least annually and more frequently, as required.

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STAKEHOLDER GROUP	WHY WE ENGAGE	HOW AND WHEN WE ENGAGE (Annual <sup>1</sup> unless otherwise stated)	HOW AND WHEN WE ENGAGED FOR THE ESG DMA 2025	HOW THE ENGAGEMENT OUTPUTS ARE USED	RELEVANT POLICIES, TARGETS AND ACTIONS ESRs DISCLOSURE SECTION REFERENCE
<p><b>SUPPLIERS / PROSPECTIVE SUPPLIERS &amp; INFRASTRUCTURE PARTNERS</b></p> <p><b>Included Parties</b> Building and demolition contractors, OEMs, raw material vendors, contractors, service providers, landowners and real estate partners, internet exchange network providers, fibre providers, facility management and maintenance contractors, utility companies, waste management companies</p>	<p>Assess new suppliers' ESG policies and performance during supplier selection, monitor existing supplier ESG policies performance, obtain supplier feedback on Global Switch's ESG policies, targets and actions.</p>	<ul style="list-style-type: none"> <li>- Supply chain desktop analysis</li> <li>- Supplier onboarding and contractual documents (ad hoc)</li> <li>- Supplier meetings and reporting of site environmental and H&amp;S impacts (ad hoc)</li> <li>- Whistleblowing channels (ad hoc)</li> <li>- Social media (ad hoc)</li> <li>- Industry events and membership organisation participation (ad hoc)</li> <li>- ESG Report</li> <li>- Website (ad hoc)</li> </ul>		<p>Supplier ESG performance informs procurement choices, contract clauses and risk-mitigation actions. Monitor potential and actual impacts and risks as well as labour-rights risks in the extended supply chain.</p>	<p>SBM-2, SBM-3, IRO-1, G1 -1, G1-2</p>
<p><b>LOCAL COMMUNITIES</b></p> <p><b>Included Parties</b> Residents, neighbours, local shops or members of the public near facilities, waste heat recipients, local universities</p>	<p>Address construction impacts and community benefits (noise, traffic, water, skills).</p>	<ul style="list-style-type: none"> <li>- Contact with site teams (ad hoc)</li> <li>- Public consultation during developments' planning stage (ad hoc)</li> <li>- Through social issues-related NGOs (ad hoc)</li> <li>- Whistleblowing channel (ad hoc)</li> <li>- Social media</li> <li>- ESG Report (ad hoc)</li> <li>- Website (ad hoc)</li> </ul>	<ul style="list-style-type: none"> <li>- Through interviews from the site teams on what matters to their local communities</li> <li>- Through the review of local complaints registers</li> </ul>	<p>Community views and needs shape construction impacts' mitigation, local employment schemes and community-benefit partnerships.</p>	<p>SBM-2, SBM-3, IRO-1, S3</p>
<p><b>GOVERNMENTS &amp; REGULATORS</b></p> <p><b>Included Parties</b> Government technology departments, permitting bodies, environmental regulators, city councils, emergency services</p>	<p>Ensure license-to-operate and anticipate regulatory changes.</p>	<ul style="list-style-type: none"> <li>- Regulatory consultations (ad hoc)</li> <li>- Permit processes (ad hoc)</li> <li>- Compliance briefings (ad hoc)</li> </ul>	<ul style="list-style-type: none"> <li>- Desktop study on what is important to regulators as expressed in compliance requirements</li> </ul>	<p>Regulator guidance sets compliance procedures, environmental management programmes, community action and future expansion design.</p>	<p>SBM-2, SBM-3, IRO-1, ESG chapters</p>

<sup>1</sup>Ad-hoc engagements occur at least annually and more frequently, as required.

## STAKEHOLDER ENGAGEMENT SUMMARY



STAKEHOLDER GROUP	WHY WE ENGAGE	HOW AND WHEN WE ENGAGE (Annual <sup>1</sup> unless otherwise stated)	HOW AND WHEN WE ENGAGED FOR THE ESG DMA 2025	HOW THE ENGAGEMENT OUTPUTS ARE USED	RELEVANT POLICIES, TARGETS AND ACTIONS ESRs DISCLOSURE SECTION REFERENCE
<b>VALUE CHAIN WORKERS</b> <b>Included Parties</b> Supplier and subcontractor staff, customer staff working on Global Switch premises	Monitor potential and actual impacts and risks including labour rights and H&S risks and impacts.	<ul style="list-style-type: none"> <li>Whistleblowing channel (ad hoc)</li> <li>Health &amp; Safety – related engagement</li> </ul>	<ul style="list-style-type: none"> <li>Grievance / whistleblowing mechanism</li> </ul>	Findings adjust contractor H&S training, audit schedules and labour-standards clauses in contracts.	SBM-2, SBM-3, IRO-1, S2
<b>THE NATURAL ENVIRONMENT</b> <b>Included Parties</b> Water resources, biodiversity, ecosystems (via NGOs, proxies)	Identify environmental dependencies and impacts to inform ESG strategy.	<ul style="list-style-type: none"> <li>Environmental assessments for ISO14001</li> <li>Lifecycle studies for materials in new developments (ad hoc)</li> <li>Proxy indicators, e.g., SBTi (ad hoc)</li> </ul>	<ul style="list-style-type: none"> <li>Environmental assessments for ISO14001</li> <li>Whole lifecycle carbon (WLCA) studies for materials in new developments</li> <li>Proxy indicators (e.g., SBTi, best practice ESG disclosure requirements, ESG materiality)</li> </ul>	Assessments underpin environmental targets and low-carbon design specifications.	SBM-2, SBM-3, IRO-1, E1, E3, E4, E5
<b>END USERS / CUSTOMERS OF CUSTOMERS</b> <b>Included Parties</b> General public, digital consumers, children (vulnerable users)	Understand downstream reliability and social-Impact expectations.	<ul style="list-style-type: none"> <li>Survey insights from key customers (ad hoc)</li> <li>Desktop research</li> <li>Materiality validation</li> </ul>	<ul style="list-style-type: none"> <li>Whistleblowing channel (ad hoc)</li> <li>Review of customer feedback</li> </ul>	End-user perspectives guide reliability standards.	SBM-2, SBM-3, IRO-1, S4

<sup>1</sup>Ad-hoc engagements occur at least annually and more frequently, as required.

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### CHANNELS TO RAISE CONCERNS AND ACCESS TO REMEDY

(S1-2, S1-13, S1-16, S2-2, S3-2, S4-2, G1-1, G1-4, G1-5; GRI 2-16, 2-25 to 2-27)

Global Switch provides multiple channels to internal and external stakeholders to raise concerns, report impacts, and access remedy. The Group HR Director and Chief Legal Officer jointly oversee due diligence, and critical concerns are communicated to the COO who is the Board’s delegated highest governance authority on ESG at Global Switch. These channels include:

#### Employee Grievance Policy and Channels

Global Switch maintains accessible grievance channels for employees to raise concerns. Employees may do so through informal dialogue with their line manager, directly with HR, or via a formal written grievance in line with the Group’s Grievance Policy. The policy guarantees procedural fairness, confidentiality, and non retaliation, and is overseen jointly by the Chief Legal Officer and Group HR Director. These mechanisms form part of our broader due diligence framework for identifying, assessing and addressing potential impacts on our workforce.

#### Whistleblowing Policy and Channels

Our Whistleblowing Policy outlines the types of misconduct that may be reported, the investigative procedures followed, and the protections available to whistleblowers, including anonymity and safeguards against retaliation. The policy is included in mandatory training for all new employees

and refreshed training for all staff. From 2026, information on whistleblowing channels is available to all via our website. In 2025, Global Switch maintained a whistleblowing system accessible to all, which was part of the mandatory compliance training for all new staff and supported by internal communications via the intranet. The system is available in multiple languages as applicable to our operating regions. In 2025 there was no formal response time target, and any reported incidents were addressed timely in line with the nature of the matter raised. Since February 2026, we have further strengthened our whistleblowing framework by implementing a 24/7 whistleblowing helpline and portal available in all languages, expanding accessibility and reinforcing independence in our reporting mechanisms. This channel is accessible to all including customers, value chain workers and community members. A response framework has been introduced, providing acknowledgement within seven days and progress updates within three months. Our Whistleblowing and Grievance Policies are supported by our Disciplinary Policy, which sets out clear and transparent procedures for investigating, addressing and remedying confirmed cases of misconduct.

#### Customer Portal

Customer concerns/issues can be raised via the Customer Portal by submitting a case ticket to highlight the issue that requires resolving. These tickets are then automatically directed to the correct internal department for resolution. The customer can view the progress of the ticket raised via the Customer Portal, 24/7. These channels are managed locally at each site and supported by the Group Data Centre Operations Support (DCOS)

guidelines and the Group’s Business Continuity Plans. All issues logged through these processes are escalated by severity and reviewed by either the Executive Committee or project-level governance, as appropriate.

METRICS RELATING TO CONCERNS REPORTED AND INCIDENTS OF LEGAL NON COMPLIANCE	2025 INCIDENTS AND FINES	ESRS /GRI REFERENCE
Number of substantiated employee or value-chain worker-related human rights or discrimination incidents reported.	0	S1-2, S1-16, S2-2
Number of fines, penalties or compensation for damages for incidents of discrimination and other human rights incidents reported.	0	S1-16, GRI 406
Number of substantiated complaints received from consumers or end-users or any members of the community in the reporting period.	0	S4-2
Number of substantiated incidents of corruption or bribery recorded.	0	G1-4
Number of significant legal non compliances and relevant fines.	0	GRI 2-27

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## DOUBLE MATERIALITY ASSESSMENT

(IRO-1; GRI 3-1)

### DMA METHODOLOGY OVERVIEW

The Double Materiality Assessment (DMA) applies the same reporting boundary and 2025 reporting period set out in the About this Report section. Forward-looking horizons are defined as short term (2025), medium term (2026-2030) and long term (2031 and beyond). For climate-scenario analysis, the risk outputs from the periods 2020-2029 and 2030-2039 were used from the climate scenarios modelling results for the short/ medium and for the long term horizons respectively.

To determine which sustainability matters are material for both impact and financial reporting, Global Switch in 2025 refreshed the double materiality assessment carried out for year 2024 which followed the step-by-step process prescribed in ESRS and GRI guidance and appointed a specialist third party auditing consultancy to offer pre-assessment feedback. The steps below show how the long list of potential Impacts, Risks and Opportunities (IROs) generated in 2024 was reviewed for year 2025. Scoring was reviewed against clearly defined impact and financial-materiality criteria; IRO wording was reviewed to ensure it clearly described actual vs. potential IROs. The IROs that met our internal significance threshold were classified as material and finally validated for inclusion in this report. The material IROs are listed within the relevant topical disclosures in this report.

ESRS / GRI DMA STEP	DMA METHODOLOGY (CALENDAR YEAR 2025)
<b>01</b> Define the value-chain scope	Confirmed the Upstream, Own Operations and Downstream activities for all seven in-scope facilities and support functions to ensure every significant dependency and impact could be captured.
<b>02</b> Identify potential sustainability matters	Built a long-list of Impacts, Risks & Opportunities (IROs) by screening ESRS1 Appendix A List of topics and GRI topic standards, reviewing prior disclosures, supplier-ESG research and the corporate climate-risk register.
<b>03</b> Gather evidence & stakeholder input	Collected qualitative and quantitative peer benchmarks, ESG rating agencies feedback and ESG experts' input supplemented by desktop research on regulatory trends.
<b>04</b> Assess Impact materiality	Reviewed the scoring of each Impact on Scale, Scope, Irremediability and Likelihood; human-rights topics received the mandatory additional severity weighting. Each was tagged actual vs. potential and assigned to short-, medium- or long-term horizon. Scores were normalised to a 0–10 Impact Significance scale.
<b>05</b> Assess Financial materiality	Reviewed the scoring of each Risk or Opportunity on Magnitude using financial-effect bands and Likelihood probability bands agreed with Group Finance. Each was tagged actual vs. potential and assigned to short-, medium- or long-term horizon. Scores were normalised to a 0–10 Financial Significance scale.
<b>06</b> Determine material topics	Any topic scoring $\geq 6.0$ on either lens was classified as material. Each was tagged actual vs. potential and assigned to short-, medium- or long-term horizon.
<b>07</b> Validate & approve results	Impact and financial scores, plus underlying rationales, were reviewed and formally approved by the Chief Operating Officer in February 2026.
<b>08</b> Consolidate material IROs for disclosure	The Group ESG Consultant carried out the consolidation of Impacts, Risks, and Opportunities in line with ESRS principles, grouping items with shared sources or effects while maintaining distinctions where necessary. For example, climate-related infrastructure risks were merged under E1, while child and forced labour risks remained separate due to their distinct legal implications.

## LIST OF MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

(IRO-2; GRI 3-2)

### DMA METHODOLOGY OVERVIEW

In the DMA review for year 2025 two more material topics were added (**Biodiversity and Ecosystems** and **Affected Communities**) due to their increasing significance, and one IRO was removed (**Privacy of Employees**) due to the reinforcement of controls in this area by Global Switch in 2025. The graph on the right shows the topics determined as material and the detailed IROs are summarised in the list that follows arranged by their type and subtopic. On the graph the material topics are listed in chronological order, rather than relative materiality. On the list of IROs, where an IRO belongs to two types (e.g., it is both an Impact and a Risk), the IRO is listed in the category where it has the highest materiality score in the DMA.



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THE MATERIAL IROS BASED ON THEIR TYPE AND SUBTOPIC:

TYPE	ESRS	SUBTOPIC
+	E1	Grid relief in emergencies
+	S1	Secure employment of our employees
+	S1	Adequate wages for our employees
+	S1	Freedom of association
+	S1	Work-life balance of our employees
+	S1	Training and skills development of our employees
+	G1	Corporate culture
+	G1	ESG reporting
+	G1	Memberships / participation in associations

TYPE	ESRS	SUBTOPIC
-	E1	Climate change mitigation
-	E4	Climate change impact on biodiversity
-	E5	Raw material use
-	E5	End-of-Life Waste
-	E5	Waste heat
-	S2	Working time of our supply chain workers
-	S2	Inadequate Health and Safety for our supply chain workers
-	S2	Child labour in our supply chain
-	S2	Forced labour in our supply chain
-	S2	Privacy of our supply chain workers
-	G1	Management of relationships with suppliers on ESG matters
-	G1	Management of payment practices regarding suppliers

TYPE	ESRS	SUBTOPIC
◆	S1	Training and skills development of our employees
◆	S3	Positive impact and shared value opportunities in local communities
▲	E1	Climate adaptation
▲	E1	Climate transition plan
▲	E1	Energy use
▲	E3	Water consumption
▲	E3	Water withdrawals
▲	E5	Critical minerals dependency
▲	S1	Diversity of our employees
▲	S3	Local community concerns about the use of resources
▲	S4	Privacy of our customers and end users
▲	S4	Access to information and personal safety of consumers and/or end users
▲	G1	Protection of whistleblowers
▲	G1	Management of relationships with suppliers on ESG matters
▲	G1	Anti-corruption and bribery

- + Positive Impacts (actual/potential)
- Negative impacts (actual/potential)
- ◆ Opportunities
- ▲ Risks

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## POLICY OVERVIEW

(GRI 2-23)

POLICY	DESCRIPTION OF KEY CONTENTS	SCOPE OF POLICY	ACCOUNTABLE FOR IMPLEMENTATION	INTERNATIONALLY RECOGNISED INSTRUMENTS / LEGAL FRAMEWORKS
<b>ACCEPTABLE USE POLICY</b> Availability: ●	Sets out Global Switch's controls for responsible and secure use of information assets-supporting business sustainability by safeguarding data integrity, reducing resource misuse, and promoting resilient, ethically managed digital infrastructure.	All users accessing Global Switch's information assets.	Group Information Director	ISO/IEC 27001:2022
<b>ADOPTION AND SURROGACY POLICY</b> Availability: ●	Provides guidelines and benefits for employees engaging in adoption or surrogacy. Outlines eligibility criteria, support mechanisms, and compliance with local employment laws.	FR, UK, DE, CN, NL, SG, ES Dual language French – English, German – English, Dutch – English, Spanish – English	Group HR Director	Local employment law, relevant ILO standards
<b>ANNUAL LEAVE POLICY</b> Availability: ●	Outlines employee annual leave entitlements, accrual methods, and usage guidelines in compliance with national labour laws. Presented in English and local language as required.	FR, UK, DE, CN, NL, SG, ES Dual language French – English, German – English, Dutch – English, Spanish – English	Group HR Director	Local employment law, ILO Standards
<b>ANTI-BRIBERY AND CORRUPTION POLICY</b> Availability: ●	Outlines procedures and controls to prevent bribery and corruption in all business dealings. Includes guidelines for gifts, hospitality, reporting, and compliance with anti-corruption laws.	FR, UK, DE, CN, NL, SG, ES	Chief Legal Officer	OECD Guidelines, UN Global Compact, local anti-corruption laws
<b>ANTI-HARASSMENT POLICY</b> Availability: ●	Defines workplace harassment and inappropriate conduct. Provides procedures for reporting harassment. Guarantees confidentiality and protection from retaliation. Mandates training and awareness campaigns. Supports respectful and inclusive workplace culture.	FR, UK, DE, CN, NL, SG, ES	Group HR Director	ILO Conventions (e.g., No. 111)
<b>CODE OF CONDUCT</b> Availability: ●	Establishes ethical standards and expectations regarding behaviour, conflicts of interest, confidentiality, anti-bribery, and overall business conduct.	FR, UK, DE, CN, NL, SG, ES	Group HR Director	OECD Guidelines for Multinational Enterprises
<b>DATA CENTRE CYBER SECURITY</b> Availability: ●	Protects infrastructure against unauthorised access. Outlines firewall, IDS/IPS, and patching requirements. Describes roles and responsibilities in incident response. Ensures regular vulnerability testing. Supports client data confidentiality and uptime assurance.	FR, UK, DE, CN, NL, SG, ES	Group Information Director	GDPR (Articles 33 & 34), NIST Cybersecurity Framework, ISO/IEC 27001

● Corporate intranet ● Corporate website

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## POLICY OVERVIEW



POLICY	DESCRIPTION OF KEY CONTENTS	SCOPE OF POLICY	ACCOUNTABLE FOR IMPLEMENTATION	INTERNATIONALLY RECOGNISED INSTRUMENTS / LEGAL FRAMEWORKS
<b>GLOBAL DATA PROTECTION POLICY</b> Availability: ●	Establishes a comprehensive, organisation-wide framework governing the lawful, secure and accountable collection, processing, storage, transfer and protection of Personal Data, defining responsibilities, governance structures, mandatory safeguards, data subject rights, breach reporting, supplier obligations, and compliance expectations for all personnel across the business.	FR, UK, DE, CN, NL, SG, ES	Data Protection Manager (“DPM”)	EU General Data Protection Regulation (GDPR), UK GDPR and Data Protection Act 2018, national data protection laws for each region in which we operate.
<b>DATA PROTECTION IMPACT ASSESSMENT POLICY</b> Availability: ●	Defines the process for conducting Data Protection Impact Assessments (DPIAs) to identify and mitigate risks related to data processing activities. Provides guidelines on when a DPIA is required and the steps for its completion.	FR, UK, DE, CN, NL, SG, ES	Group IT & Data Director	GDPR (Recital 91 & Article 35), ISO/IEC 27701
<b>DOA POLICY</b> Availability: ●	Summarises thresholds for managerial authorisations. Clarifies differences across departments or regions. Simplifies execution of the full Delegation of Authority. Quick reference tool for daily business activities. Integrated with enterprise resource planning systems.	Applies globally across all Global Switch operations.	Chief Commercial Officer	Internal Regulations
<b>ENVIRONMENTAL POLICY</b> Availability: ●●	Sets out Global Switch’s commitment to minimising environmental impacts through ISO 14001-aligned environmental management, pollution prevention, efficient use of energy and water, sustainable design standards, waste reduction, and biodiversity protection. Defines roles and responsibilities for achieving continual improvement across all operations and the supply chain.	Applies globally across all Global Switch operations and supply chain.	Group Operations Director	ISO14001, EU Climate Neutral Data Centre Pact, SBTi, Global Green Building standards
<b>EQUAL OPPORTUNITIES POLICY</b> Availability: ●	Promotes non-discrimination across all roles. Covers recruitment, promotion, and training. Applies to age, gender, race, disability, and more. Supports an inclusive work environment. Regular reviews to ensure policy effectiveness.	FR, UK, DE, CN, NL, SG, ES	Group HR Director	ILO Conventions (e.g., Equal Remuneration), local compliance
<b>FACILITY DESIGN POLICY</b> Availability: ●	Promotes energy-, water- and carbon-efficient data centre design.	Applies globally across all Global Switch operations.	Group Delivery Director	Local Regulations, EU Climate Neutral Data Centre Pact, ISO/IEC 30134-6, F-Gases Regulations
<b>FLEXIBLE WORKING POLICY</b> Availability: ●	Provides guidelines for flexible working arrangements, including options for remote working, flexible hours, and adjustments to traditional working practices.	FR, UK, DE, CN, NL, SG, ES Dual language French – English, German – English, Dutch – English, Spanish – English	Group HR Director	Local labour laws, EU directives on flexible working

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## POLICY OVERVIEW



POLICY	DESCRIPTION OF KEY CONTENTS	SCOPE OF POLICY	ACCOUNTABLE FOR IMPLEMENTATION	INTERNATIONALLY RECOGNISED INSTRUMENTS / LEGAL FRAMEWORKS
<b>GENERAL DATA PROTECTION REGULATION (GDPR) DATA BREACH POLICY</b> Availability: ●	Outlines procedures for detecting, reporting, and mitigating data breaches. Specifies roles, notification timeframes (e.g., within 72 hours as per GDPR), and communication protocols with regulators and affected individuals.	FR, UK, DE, CN, NL, SG, ES	Group Information Director	GDPR (Articles 33 & 34), NIST Cybersecurity Framework, ISO/IEC 27001
<b>GENERAL DATA PROTECTION REGULATION (GDPR) PRIVACY POLICY</b> Availability: ●	Public-facing policy describing how personal data from external stakeholders (customers, visitors) is collected, used, and protected, ensuring transparency and adherence to legal requirements.	FR, UK, DE, CN, NL, SG, ES	Group Information Director	GDPR and local compliance
<b>GIFTS AND HOSPITALITY POLICY</b> Availability: ●	Provides guidelines for acceptable gifts and hospitality practices. Establishes limits, approval procedures, and disclosure requirements to prevent conflicts of interest and maintain business integrity.	FR, UK, DE, CN, NL, SG, ES	Group HR Director	OECD Guidelines, local corporate governance standards
<b>GLOBAL DATA RETENTION POLICY</b> Availability: ●	Establishes the principles, responsibilities, retention schedules and governance processes that ensure Personal Data is stored, processed, and deleted in a lawful, secure, and time-bound manner in line with applicable Data Protection Legislation and Global Switch's internal data-protection requirements.	FR, UK, DE, CN, NL, SG, ES	Europe Legal Counsel	OECD Guidelines, local corporate governance standards
<b>HEALTH AND SAFETY POLICY</b> Availability: ●●	Establishes guidelines for ensuring workplace safety, conducting risk assessments, emergency preparedness, and promoting employee wellbeing.	FR, UK, DE, CN, NL, SG, ES	Group Operations Director	ISO 45001, ILO Occupational Safety and Health Conventions
<b>INFORMATION SECURITY POLICY</b> Availability: ●●	Protects information assets against unauthorised access. Ensures compliance with regulatory and legislative requirements. Maintains a Business Continuity Plan to ensure information and vital services are available. Provides information security training to staff as required. Investigates all actual or suspected breaches of information security.	FR, UK, DE, CN, NL, SG, ES	Group Information Director	GDPR (Articles 33 & 34), NIST Cybersecurity Framework, ISO/IEC 27001

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<b>IVF AND ANTENATAL POLICY</b> Availability: ●	Details support and benefit available to employees undergoing IVF treatment or who are antenatal. Includes eligibility criteria, benefit structure, and guidelines for leave and accommodations.	FR, UK, DE, CN, NL, SG, ES Dual language French – English, German – English, Dutch – English, Spanish – English	Group HR Director	Local employment regulations, best practice guidelines
<b>JOB APPLICANT PRIVACY POLICY</b> Availability: ●●	Describes how personal data of job applicants is collected, processed, and safeguarded. Emphasises compliance with GDPR and local data protection guidelines.	FR, UK, DE, CN, NL, SG, ES Dual language French – English, German – English, Dutch – English, Spanish – English	Group HR Director	GDPR, local Data Protection Authority guidelines
<b>MATERNITY LEAVE POLICY</b> Availability: ●	Details employee rights regarding maternity leave, including eligibility, duration, and benefits. Ensures compliance with local labour laws and provides guidance on the application process.	FR, UK, DE, CN, NL, SG, ES Dual language French – English, German – English, Dutch – English, Spanish – English	Group HR Director	Local employment law, EU maternity directives
<b>MODERN SLAVERY STATEMENT</b> Availability: ●	Outlines Global Switch’s commitment to eradicating modern slavery, servitude, forced labour, and human trafficking. Describes internal policies, recruitment processes, training initiatives, and due diligence in the supply chain to ensure compliance with the Modern Slavery Act 2015.	Applies globally across all Global Switch operations and supply chain partners.	Chief Legal Officer (with Group Board oversight)	Modern Slavery Act 2015; aligned with international human rights standards
<b>PATERNITY LEAVE POLICY</b> Availability: ●	Outlines eligibility, duration, and procedural guidelines for paternity leave. Ensures compliance with local employment laws.	FR, UK, DE, CN, NL, SG, ES Dual language French – English, German – English, Dutch – English, Spanish – English	Group HR Director	Local employment law
<b>PRIVACY POLICY – FOR PROCESSING EMPLOYEE’S PERSONAL DATA</b> Availability: ●●	Details specific measures and guidelines for handling, processing, and safeguarding employees’ personal data, including payroll, performance records, and sensitive information.	FR, UK, DE, CN, NL, SG, ES	Data Protection Manager	GDPR, local data protection regulations

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<b>PROCESS FOR THE DELIVERY OF PROJECTS</b> Availability: ●	Details specific measures and guidelines for handling, processing, and safeguarding employees' personal data, including payroll, performance records, and sensitive information.	EN	Group Delivery Director	RIBA Plan of work stages (2020)
<b>PROCUREMENT MANAGEMENT POLICY</b> Availability: ●	Defines the best practice of conducting procurement within the business to minimise risk and ensure compliance.	FR, UK, DE, CN, NL, SG, ES	Group Procurement Director	Local laws
<b>QUALITY POLICY</b> Availability: ●●	Commits to delivering best-in-class products and services that meet or exceed customer expectations. Implements a Quality Management System conforming to ISO 9001:2015 standards. Provides relevant skills training and quality awareness to staff and contractors. Regularly reviews business aspects to identify improvement opportunities. Maintains a resilient and secure operational environment through quality systems.	FR, UK, DE, CN, NL, SG, ES	Group Operations Director	ISO 9001
<b>SICKNESS ABSENCE POLICY</b> Availability: ●	Outlines our approach to managing ill-health-related absence through clear procedures for reporting, certification, support, reasonable adjustments and return-to-work processes, while proactively identifying, preventing and managing stress-related ill-health through open communication, assessing and mitigating workplace stressors, monitoring workloads, enabling early intervention and providing timely wellbeing support.	FR, UK, DE, CN, NL, SG, ES	Group HR Director	National labour laws
<b>STRESS MANAGEMENT POLICY</b> Availability: ●	Outlines our approach to managing ill-health-related absence through clear procedures for reporting, certification, support, reasonable adjustments and return-to-work processes, while proactively identifying, preventing and managing stress-related ill-health through open communication, assessing and mitigating workplace stressors, monitoring workloads, enabling early intervention and providing timely wellbeing support.	All Global Switch employees	Group HR Director	National labour laws

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<p><b>SUPPLIER CODE OF CONDUCT</b> Availability: ●●</p>	<p>Global Switch is committed to upholding high ethical standards of conduct, promoting good corporate governance and supporting a culture of integrity. As a leading owner, operator, and developer across multiple jurisdictions, we work with a diverse range of suppliers, including contractors, consultants, resellers, and service providers (collectively referred to as “Suppliers”). To achieve our business objectives, we have chosen to align with internationally recognised principles and standards in a manner that we believe is the most relevant and material to our business, including building relationships with Suppliers that align with our values and standards and who seek to conduct business responsibly by respecting human rights and labour, environmental and anti-corruption laws, regulations and standards.</p>	<p>Applies globally across all Global Switch operations and supply chain partners.</p>	<p>Europe Legal Counsel</p>	<p>United Nations Guiding Principles on Business and Human Rights; International Labour Organization’s Declaration on Fundamental Principles and Rights at Work; International Labour Organization’s Core Conventions (No. 29, 87, 98, 100, 105, 111, 138, 182) and Labour Standards; United Nations Convention on the Rights of the Child Article 32; OECD Guidelines for Multinational Enterprises; OECD Due Diligence Guidance for Responsible Business Conduct; United Nations Global Compact Principles; and International Bill of Human Rights, including the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights.</p>
<p><b>WATER STEWARDSHIP POLICY</b> Availability: ●●</p>	<p>Outlines the water-related measures and considerations that inform the selection of cooling infrastructure solutions in Global Switch projects globally to minimise water use.</p>	<p>Applies globally across all Global Switch operations.</p>	<p>Solutions Engineering Director</p>	<p>EU Data Centre Alliance, Aqueduct Water Risk Atlas, ISO/IEC 30134</p>
<p><b>WHISTLEBLOWER POLICY</b> Availability: ●●</p>	<p>Provides secure channels for reporting unethical, unlawful, or non-compliant behaviour. Ensures confidentiality, protection against retaliation, and establishes clear follow-up procedures for reported concerns.</p>	<p>Applies globally across all Global Switch operations and external stakeholders.</p>	<p>Group HR Director</p>	<p>EU Whistleblowing Directive, Local laws</p>

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## CLIMATE CHANGE

Board-level responsibility	Managerial responsibility
COO	Facility MDs (Climate change physical and transition risks, Green Buildings, Water Scarcity), Group Procurement Director (Renewables), Group Delivery Director (Green Buildings, Energy Efficiency), Group Commercial Director (Climate change physical risks), Subject Matter Expert (Climate change transition risks - depending on nature of risk)

Addressing climate change remains central to Global Switch’s strategy as we work to enable low carbon, resilient, and energy efficient data centre operations. In 2025, we advanced our approach to climate mitigation and strengthened our adaptation planning. Through continuous improvements in energy efficiency and decarbonisation, we are committed to reducing our environmental impact while supporting reliable and sustainable digital infrastructure.

### CLIMATE-RELATED RISKS AND SCENARIO ANALYSIS, RESILIENCE AND POTENTIAL FINANCIAL EFFECTS (E1-2, E1-3, E1-11; SASB IF-RE-450a.2)

#### Climate Risk Identification Methodology

Global Switch has conducted a climate risk and resilience assessment aligned with the recommendations of the Taskforce for Climate-related Financial Disclosures (TCFD) which informed its Group level DMA. Given the forward-looking nature of climate-related risks, the assessment applied a structured, multi-step methodology to identify and evaluate material physical and transition risks across the Group’s global data centre portfolio and value chain.

The assessment combined scenario-based analysis, external climate datasets and internal operational expertise to ensure risks were assessed consistently across locations while reflecting site-specific exposure and sensitivities.

The external Climonomics platform was used a risk analytics platform that calculates the financial impact of climate risk on physical assets and aggregates this up to the portfolio level. The platform was chosen as it is science-based, its methodology leverages the latest available climate change models (CMIP6), ensuring an accurate physical climate risk assessment, and its capability for data centre-related analysis situated across the globe.

Analysis can be carried out using up to four climate scenarios based on the globally recognised Shared Socioeconomic Pathways for climate change impacts: SSP1-2.6, SSP2-4.5, SSP3-7.0, SSP5-8.5.

**STEP 1: FRAMING VIA TCFD RISK CATEGORIES**

The assessment adopted the TCFD risk classification framework, categorising climate-related risks into physical (acute and chronic) and transition (policy, legal, market, technology, and reputation) dimensions. This framework ensured comprehensive coverage and provided a consistent risk taxonomy across all sites.

**Table:** Climate Hazards Assessed (Physical and Transition)

HAZARD TYPE	HAZARD	SPATIAL RESOLUTION (physical hazards)
<b>Physical – Acute</b>	Pluvial flooding	25 x 25 km
	Fluvial flooding	1 x 1 km
	Coastal flooding	90 x 90 m
	Tropical cyclones	25 x 25 km
	Wildfire	25 x 25 km with a 300m x 300m land use mask
<b>Physical – Chronic</b>	Temperature extremes	25 x 25 km
	Drought	25 x 25 km
	Water stress	Variable (approx. 50- 100km)
	Landslides	25 x 25 km with an 8km x 8km landslide susceptibility mask
<b>Transition</b>	Policy & regulatory change	
	Legal (climate litigation)	
	Market dynamics	
	Technology disruption	
	Reputational risks	

**STEP 2: CLIMANOMICS SCENARIO MODELLING INSIGHTS**

The Climanomics platform was used to model climate risk exposure across Global Switch’s global data centre portfolio. The platform draws on authoritative datasets (e.g., WRI Aqueduct 4.0 water stress index, flood mapping, temperature and precipitation projections) to assess business financial risks across physical and transitional categories under defined climate scenarios. The following scenarios were applied:

- **Low Scenario (SSP1–2.6):** aggressive mitigation, net zero emissions by 2050, aligned with 1.5°C Paris Agreement pathway.
- **Medium Scenario (SSP2–4.5):** stabilisation of emissions by 2050, leading to 2.1–3.5°C warming by 2100.

Climate-related physical and transitional hazards were assessed for the two decadal timeframes available on the Climanomics model that were relevant to Global Switch’s DMA time horizons:

**2020–2029:** Short and Medium Term

**2030–2039:** Long Term

Modelled outputs were treated as directional indicators rather than definitive predictions, recognising limitations in data centre-specific modelling. Where gaps were identified, results were supplemented by site-level operational knowledge and expert judgement.

### STEP 3: BUSINESS-SPECIFIC REVIEW AND REFINEMENT

Modelled outputs were reviewed by the engineering team, subject matter experts from each facility and the Group ESG function to validate relevance to Global Switch's operating model and asset characteristics. A financial materiality threshold of **£115 million** was applied at either at Group or individual asset level. This review incorporated:

- Data centres' high cooling demand and reliance on utility-scale infrastructure were factored in.
- Costs borne primarily by customers (e.g. electricity) were considered in terms of indirect exposure.
- Physical infrastructure protections (e.g. coastal defences) not captured by external models were incorporated.

The following two adjustments were made as a result of the review of the model outputs to the financially material risks:

- Madrid showed low modelled water stress impacts, but internal assessments identified high local risk, and it was treated as material.
- Hong Kong was missing water stress projections but flagged as materially exposed based on known scarcity challenges.

### STEP 4: CLIMATE RISK REGISTER ALIGNMENT

The results were used to update Global Switch's internal Climate Risk Register. Outdated risks were removed, overlapping entries rationalised, and new risks incorporated. This ensured alignment between climate modelling outputs and the enterprise management framework used for financial assessment and governance.

#### **Material Climate Risks & Opportunities, potential financial effects and resilience integration with the business strategy**

Global Switch identified a limited number of Group-level, climate-related physical and transitional risks that were assessed and these were deemed material over all time horizons. As part of Global Switch's double materiality assessment and climate resilience analysis, the Group evaluated potential climate-related opportunities, including energy efficiency improvements, low-carbon technologies, and regulatory incentives. At this stage, no climate-related opportunities were identified that met the Group's internal threshold of £115 million. Nevertheless, Global Switch continues to monitor evolving policy, market and technology developments that could generate future opportunities aligned with its decarbonisation strategy. The following table below summarises the material risks, their potential financial effects, affected locations, adaptation or mitigation strategies, and current implementation status.

**Table:** Material Climate-related risks, potential financial effects and adaptation/resilience strategy

RISK AND RISK TYPE	CLIMATE RELATED RISKS AND POTENTIAL FINANCIAL EFFECTS' MATERIALITY (E-11)	POTENTIALLY IMPACTED FACILITIES (BEFORE MITIGATION)	ADAPTATION STRATEGY FOR RISK MITIGATION AND RESILIENCE	IMPLEMENTATION STATUS
<b>Temperature Extremes</b> (Physical risk)	Increased cooling loads, HVAC degradation, workforce productivity loss due to heat stress. Financial materiality: Potentially material at Group level.	All data centres	N+1 or greater system configurations are used to mitigate operational risk from HVAC degradation during heatwaves or water disruptions. Adoption of next-generation cooling technologies (e.g., air-assisted, liquid cooling, adiabatic systems); enhanced HVAC maintenance schedules; emergency chillers and monthly performance monitoring.	Enhanced cooling systems have been implemented at selected sites (AMS, FRA, LON), with cooling plant upgrades and replacements approved or in progress at others in line with the business plan for ongoing data centre upgrades.
<b>Water Stress</b> (Physical risk)	Operational disruption from freshwater scarcity; elevated municipal water charges. Financial materiality: Potentially material at Group level.	Frankfurt, London, Madrid, Hong Kong, Singapore	Dual-source water supply and on-site storage are included in business continuity plans. Roll-out of water-efficient cooling systems, WUE targets, site-level water risk monitoring.	Implemented at selected sites (AMS, HK, FRA, LON, SIN), with cooling system upgrades under review, in progress or planned at other locations (PAR, MAD).
<b>Drought</b> (Physical risk)	Soil desiccation leading to structural risk and potential building subsidence. Financial materiality: Potentially material in London and Paris per Climonomics - results currently investigated.	London, Paris	Design review of foundations for subsidence from drought risk.	Drought risk investigations to date show low risk of subsidence.
<b>Workforce Health &amp; Safety</b> (Physical risk)	Occupational risks (heat stress, extreme weather) affecting operations and business continuity. Financial materiality: Potentially material at Group level, due to workforce reliance and continuity risk.	All data centres, especially heat-prone sites	ISO 45001-certified emergency response protocols and heat stress mitigation measures (shaded areas, cooling stations).	Standard across all facilities.
<b>Supplier Disruption</b> (Physical risk)	Equipment, infrastructure or construction delays due to climate-impacted suppliers. Financial materiality: Potentially material at Group level, indirect but high-risk via project delays.	Global supply chain exposure (not site-specific)	Planned supplier climate risks-related screening and requirements for science-based targets from 2026; diversification of vendor base, if necessary.	Ongoing updates through the development of Responsible Supply Chain strategy planned for 2026.
<b>Energy Dependency/ Energy Efficiency Risk</b> (Physical risk)	Greater electricity demand from cooling leading to higher cost volatility and grid dependency risks causing risk in meeting efficiency expectations and impacting competitiveness and financing options. Financial materiality: Group-level operational risk.	All data centres	Increased use of renewable electricity via PPAs to enhance energy security and drive renewables development; on-site power backup systems; operational PUE targets and PUE improvement plans for data centres to optimise energy use.	Renewable electricity procurement is implemented or partially implemented across sites via PPAs and RECs. A new PPA agreement has now been signed (early 2026) for the UK as part of Global Switch's transition plan to PPAs globally. Cost optimisation actions are site-specific and ongoing.

RISK AND RISK TYPE	CLIMATE RELATED RISKS AND POTENTIAL FINANCIAL EFFECTS' MATERIALITY (E-11)	POTENTIALLY IMPACTED FACILITIES (BEFORE MITIGATION)	ADAPTATION STRATEGY FOR RISK MITIGATION AND RESILIENCE	IMPLEMENTATION STATUS
<b>Climate Transition Plan (Costs)</b> (Transition risk)	Capital investment pressure for decarbonisation: retrofits, renewables transition, fuel-switching, and technology shifts.  Financial materiality: Potentially material at Group level; potential margin impact depending on costs' timing.	All data centres	Integration with business financial planning to ensure climate transition costs are embedded in design and as part of maintenance and scheduled end-of life upgrades to minimise financial effects beyond the budget.	Actions to address climate transition costs are implemented or in progress across sites, including infrastructure upgrades, monitoring and compliance measures with site-specific improvements ongoing to meet evolving regulatory standards.
<b>Upskilling / Reskilling</b> (Transition risk)	Operational complexity and potential inefficiencies during technology transition periods.  Financial materiality: Potentially material at Group-level, subject to investment phasing.	Operations and facilities teams globally, as well as supply chain.	Career reviews and upskilling provisions, planned supply chain climate risks -screening improvements for 2026.	Active in all regions.

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**Alignment and governance of business resilience**

The resilience analysis is formally reviewed as part of Global Switch's broader risk governance cycle, with results presented to the COO. The scenario assumptions, SSP1-2.6 and SSP2-4.5, are consistent with the Group's financial planning horizon and are aligned with those used in the climate-related double materiality assessment and SBTi target setting.

These findings are used to inform capital planning, resilience investments, and engineering controls. Notably, the modelling does not currently identify any stranded assets, due to the high intrinsic value and low location-based risk of Global Switch's assets.

Ongoing use of scenario analysis tools and stakeholder engagement (including operations, engineering teams and ESG) ensures these risks are regularly reassessed. These efforts form part of the Climate Risk Register and are integrated into Global Switch's business planning and investment horizon reviews.

A review and update cycle is established to reassess risks at minimum every two years or following significant climate-relevant events (e.g., extreme summer temperatures or local water supply constraints).

**CLIMATE CHANGE IROs TRANSITION PLAN, POLICIES, ACTIONS AND TARGETS**  
(E1 SBM-3, E1-IRO-2, E1-1, E1-4 to E1-6; GRI 3-2, 3-3, 201-2; SASB IF-RE-450a.2)

Our DMA considered both physical and transitional climate change dimensions, as well as associated energy use issues. We identified a wide set of actual and potential adverse impacts, such as our lifecycle greenhouse gas emissions, which represent a negative environmental impact primarily from electricity, diesel use, and embodied carbon in construction and equipment.

We have also identified a range of risks, including energy supply constraints, risks from climate-related impacts on physical infrastructure and

workforce safety, and transitional risks related to the cost of decarbonising data centres and adapting supply chains.

Global Switch has adopted a transition plan aligned with the long-term goal of limiting global warming to 1.5°C in line with the Paris Agreement. The plan is structured to ensure a science-based, forward-looking approach to emissions reduction across Scopes 1, 2, and relevant Scope 3 categories, while embedding resilience and adaptability into operational and investment decisions.

It is a structured approach to climate change mitigation, adaptation, and energy performance. The approach consists of measures across the value chain and is aligned with internal governance structures and external standards and legislation, such as the EU Energy Efficiency Directive (EED), the EU F-Gas Regulation, ISO 14001 and ISO 50001, and the Climate Neutral Data Centre Pact (CNDCP).

Internal frameworks such as the Facility Design Policy and ESG Steering Group oversight ensure these measures are integrated into operational decision-making and strategic planning.

The Group has now set approved science-based targets, as well as targets relating to energy efficiency, renewable electricity procurement, refrigerant transition, embodied carbon, water and waste management, including Scope 3-related supplier engagement on science-based targets. These measures form an integral part of Global Switch's decarbonisation strategy and its climate resilience roadmap.

**Table:** Climate Change –IROs

SUBTOPIC	IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN	TIME HORIZON
<b>Climate change mitigation</b>	Global Switch contributes to climate change through its lifecycle emissions. This includes operational emissions from purchased electricity and diesel generators (Scope 1 & 2), refrigerant gas leaks, and embodied carbon from construction, manufacturing, transportation, and end-of-life treatment of data centre equipment and infrastructure (Scope 3).	<b>Actual Negative Impact</b>	Upstream / Own Ops / Downstream	2025 / 2026-2030 / 2031+
<b>Grid relief in emergencies</b>	By using its backup power capacity during grid strain, Global Switch may help reduce pressure on public energy infrastructure, enabling electricity to be redirected to critical services (e.g. hospitals), particularly in emergency situations.	<b>Potential Positive Impact</b>	Downstream	2026-2030 / 2031+
<b>Climate adaptation</b>	Global Switch may face operational and infrastructure risks due to climate change, including: <ul style="list-style-type: none"> <li>– Need for early replacement of cooling infrastructure (extreme heat)</li> <li>– Increased cooling demand and energy dependency</li> <li>– Water stress impacting cooling system efficiency</li> <li>– Ground instability due to drought</li> <li>– Workforce health and safety risks (heat stress, weather events)</li> <li>– Supplier disruption due to climate vulnerabilities</li> </ul>	<b>Risk</b>	Upstream / Own Ops	2026-2030 / 2031+
<b>Climate transition costs</b>	Costs for transitioning to low carbon / net zero carbon data centres can, at least temporarily, potentially affect the profitability of the business. This would be from the improvements carried out outside of the current business plan timings or if extra or interim costs or delays are incurred from the supply chain for the renovation of the data centres due to the need for renewables, net zero carbon materials, and technologies (e.g., phase out of diesel and sustainable HVOs availability) and for the upskilling / re-skilling of people to new technologies, systems or materials.	<b>Risk</b>	Upstream / Own Ops	2026-2030 / 2031+
<b>Energy use</b>	Due to the energy intensive nature of the operation of the data centres, especially with the projected growth of demand due to AI, energy security and energy efficiency can affect service continuity and customer retention as well as access to finance and future development.	<b>Risk</b>	Upstream / Own Ops	2025 / 2026-2030 / 2031+

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## Our science-based targets

### WHAT IS “SCIENCE-BASED”

Science-based climate targets are greenhouse gas reduction goals that align a Group’s decarbonisation trajectory with what climate science says is necessary to limit global warming to 1.5°C. Rather than choosing arbitrary or “nice to have” targets, organisations set emissions reduction pathways that match the carbon budgets defined by the latest climate models and the Paris Agreement.

These targets are developed using methodologies from the science-based targets initiative (SBTi), which provides sector specific guidance, emissions reduction pathways, and validation. SBTi approval provides credibility, comparability, and a clear link to global climate goals.

### OUR EMISSION TARGETS’ AMBITIONS, APPROACH AND BOUNDARIES

Target ambition, i.e., the speed of decarbonisation is defined by SBTi based on climate science and the 1.5°C, scenario (in line with the Paris Agreement for the Climate). Our targets were modelled using the SBTi resources and target setting tools.

#### 9 ACCOUNTING PRINCIPLES

- The organisational boundary used for the emissions we included was based on Global Switch’s operational control. This approach best aligns with business operations and financial reporting. All global data centre and corporate office operations were included in the boundary.
- All emissions targets have been set using the GHG Protocol Corporate Standard, and progress is tracked using operational GHG monitoring systems aligned with ESRS E1 and CSRD assurance requirement and ISO 14064-1.
- GHG emissions are reported in units of ‘CO<sub>2</sub>e’. This figure ensures the global warming impact of all GHG’s is accounted for, not just CO<sub>2</sub>.

In terms of boundaries, according to the SBTi standard for business decarbonisation targets Global Switch must set near-term targets covering:

- 95% of Scope 1 and 2 emissions as a minimum; our target boundary covers 100% of Scope 1 and 2 emissions
- 67% of Scope 3 emissions as a minimum; our target boundary covers 67.41% of Scope 3 emissions
- The organisational boundary used for the emissions we included was based on Global Switch’s operational control. This approach best aligns with business operations and financial reporting. All global data centre and corporate office operations were included in the boundary.

In terms of target setting method, Global Switch chose the Absolute Contraction trajectory approach and for Scope 1 and 2 set absolute reduction targets. For Scope 3, this can be via an “absolute reduction” target, a “supply chain engagement” target, i.e., for supply chain to set their own science-based target, or a combination of both, which was Global Switch’s choice.

In terms of locked-in emissions, no high-carbon capital investments are currently planned. Where legacy equipment with potential locked-in emissions remains (e.g., backup generators using diesel), retrofit strategies - including use of sustainable HVOs and electrification - are in progress.

## Key decarbonisation science-based targets

Global Switch has science-based targets approved by the SBTi in 2025, as follows:

### OUR SCOPE 1 AND 2 SCIENCE-BASED TARGETS

Global Switch commits to reduce Scope 1 and 2 market-based emissions by 42% by 2030, from a baseline year of 2023.

### OUR SCOPE 3 SCIENCE-BASED TARGETS

For Scope 3 the business has set:

- A target for a 42% reduction in fuel- and energy-related activities emissions (Scope 3 Category 3) by 2030 from a 2023 baseline.
- And a commitment for 74% of capital goods suppliers (by emissions) to have science-based targets by 2029.

**Key decarbonisation levers and their contribution to emissions reductions**

**SCOPE 1 AND 2 AND SCOPE 3 CATEGORY 3 FERA:**

Purchase of renewable electricity through RECs and PPAs

**OUR SCOPE 3 SCIENCE-BASED TARGETS**

Supplier engagement towards 74% of suppliers by Capital Goods-related emissions to have science-based targets by 2029

**Table:** Contribution of decarbonisation actions to emissions reductions by the SBT target years 2029 (Scope 3 Cat 2 Capital Goods) and 2030 (Scope 1 and 2, Scope 3 Cat 3 FERA)

KPI	2023 (Baseline year)	2025 (Current year)	2029 (Scope 3 Cat 2 target year)	2030 (Scope 1 and 2, Scope 3 Cat 3 (ii) target year)
<b>Scope 1 and 2 emissions</b>	tCO2e (market-based) 48,533	<b>71,227</b>	-	28,149 (-42%)
<b>i. Decarbonisation lever: Increase the share of renewable electricity procured (via RECs and PPAs)</b>	tCO2e (market-based) -	<b>+22,694</b>	-	-20,384
<b>Scope 3 Category 3 (FERA) emissions</b>	tCO2e (market-based) 16,151	<b>35,670</b>	-	9,368 (-42%)
<b>ii. Decarbonisation lever: Increase the share of renewable electricity procured (via RECs and PPAs)</b>	tCO2e (market-based) -	<b>+19,519</b>	-	-6,783
<b>Scope 3 Category 2 (Capital Goods) emissions</b> <b>iii. Decarbonisation lever: supplier engagement of capital goods on setting science-based targets</b>	% of suppliers by emissions covering capital goods with science-based targets 33%	<b>Not measured</b>	74%	-

**Consolidated Table:** Climate change IROs, Policies, Actions, Targets, Metrics/KPIs and Governance

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI	RESOURCE ALLOCATION	INTERNAL POLICY / GOVERNANCE	EXTERNAL FRAMEWORK / STANDARD	DISCLOSURE REF.
Climate change mitigation	SBTi-approved target to achieve 42% absolute reduction in Scope 1, 2, and Scope 3 (Category 3 - FERA) emissions by 2030.	By 2030 from a 2023 baseline	In progress	tCO <sub>2</sub> e	Procurement team; Capex allocation; GHG monitoring systems.	Energy procurement policy dictates purchase of renewables as far as possible through RECs and PPAs; GHG Monitoring System.	SBTi	E1-1, E1-4, E1-5, E1-6
	SBTi-approved target that 74% of suppliers by emissions covering capital goods will have science-based targets by 2029.	By 2029 from a 2023 baseline	Target set	% of suppliers by emissions covering capital goods with science-based targets	Procurement capacity-building; supplier engagement programme.	Supplier engagement programme (under development); Supplier Code of Conduct (working to embed into agreements).	SBTi	E1-1, E1-4, E1-5, E1-6
	Target to achieve 100% renewable electricity across all facilities by 2030 through green PPAs and certified RECs.	By 2030	In progress	% renewable electricity	Procurement of PPAs and RECs; procurement team oversight; financial planning.	Energy procurement policy dictates purchase of renewables as far as possible through RECs and PPAs; GHG Monitoring System.	ISO 14001, EU Energy Efficiency Directive (EED)	E1-1, E1-4, E1-5, E1-6, GRI 302
	Target to phase out diesel use transitioning to 100% sustainably sourced HVO fuel.	TBC	Under evaluation	% of generator fuel from low carbon fuel (e.g. Sustainable HVO)	Regional operations teams.	Environmental management system.	GHG carbon accounting protocol	E1-1, E1-4, E1-5, E1-6, GRI 302
	All new developments and major redevelopments must use refrigerants with a GWP < 100, as mandated by the Facility Design Policy.	Ongoing	In place (new builds); under evaluation (existing systems)	GWP of refrigerant (CO <sub>2</sub> e / kg leakage)	Developments Delivery team, regional operations teams.	Facility Design Policy.	EU F-Gas Regulation (517/2014); 2024 amendments	E1-4, E1-5
	Existing systems using high-GWP refrigerants (GWP ≥ 2,500) to be phased out in line with EU F-gas regulations: bans on virgin F-gases start in 2025/2026, reclaimed gases allowed until 2030/2032, full phase-out of GWP ≥ 750 by 2032/2035.	2023–2035	Under evaluation (legacy equipment)	% legacy systems transitioned; refrigerant GWP inventory	Regional operations teams, Asset review, refrigerant inventory tracking.	Maintenance & Asset Planning (under revision).	EU F-Gas Regulation (517/2014); 2024 amendments	E1-4, E1-5, E1-6
	Whole Life Carbon Assessments (WLCAs) required at design stage to identify and reduce embodied carbon.	Ongoing	In place (new builds)	Embodied CO <sub>2</sub> e per design	Developments Delivery team, Specialist WLCA consultants.	Facility Design Policy.	Circular economy design principles	E1-4, E1-5
	100% diversion from landfill of all waste types (construction, operations, maintenance, end-of-life) by 2030.	2024–2030	In progress	% total waste diverted	Developments Delivery team, regional operations teams, construction and facilities management or waste management contracts;	Environmental management system.	EU Circular Economy Action Plan	E1-6, E5-3

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CLIMATE-RELATED POLICIES, ACTIONS, TARGETS AND RESOURCES



**Consolidated Table:** Climate change IROs, Policies, Actions, Targets, Metrics/KPIs and Governance

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI	RESOURCE ALLOCATION	INTERNAL POLICY / GOVERNANCE	EXTERNAL FRAMEWORK / STANDARD	DISCLOSURE REF.
	Provision for waste heat recovery is included in all new data centre designs.	Ongoing	In place	% of new data centres designed with recovery systems	Developments Delivery team; integration in systems, financial planning.	Facility Design Policy	CNDCP, EED	E1-4, E1-5, GRI 302
	Target to carry out feasibility for heat recovery capability at all existing facilities.	2026	In progress – Signed contract for Paris data centre in 2025	% of data centres with heat recovery capability	Regional operations teams, Asset review, retrofit Capex, financial planning.	Environmental management system	CNDCP, EED, ISO 50001	E5-3, GRI 302
	ISO 14001-certified Environmental Management System implemented across all facilities.	Ongoing	In place	Certification	Environmental compliance team, third-party auditors.	Environmental management system	ISO 14001	E1-4, E1-5
	Operational GHG Monitoring System in place for Scope 1, 2 and 3.	Ongoing	In place	Emissions completeness, frequency	GHG data platform; Developments Delivery team, regional operations teams, construction and facilities management or waste management contracts; ESG data reporting managers, Environmental compliance team.	Environmental management system	Supports ISO14001 and ESRS assurance	E1-4, E1-5
	Target to develop strategy on biodiversity (as mitigation to historic contribution to climate change-related biodiversity loss).	Under evaluation	In progress	Policy to be in place	ESG Team input, regional operations teams, Developments Delivery team.	Biodiversity policy under development	ISO 14001	E1-4, E1-5, E1-6
<b>Climate adaptation</b>	Climate change risk assessments for facility sites and business operations (physical and transitional risks).	Ongoing	In place	% sites with assessed risks	Regional operations teams; ESG Team, Climonomics modelling tool.	Facility Design Policy	TCFD, Climonomics modelling tool screening methodology	E1-2, E1-4, E1-5
	Technical feasibility and prioritisation of industrial and non-potable water for cooling to reduce reliance on freshwater sources.	Ongoing	In place	Site-level WUE	Regional operations teams; Site infrastructure upgrades; Environmental compliance team.	Facility Design Policy, Water Stewardship Policy, water sourcing contracts	EED, Climate Neutral Data Centre Pact (CNDCP)	E1-2, E1-3, E1-4, E1-5, E1-6
	Water Usage Effectiveness (WUE) targets in place at site level;	Ongoing	In progress	WUE (L/kWh)	Regional operations teams, Facilities management systems; Environmental compliance team.	Facility Design Policy, Water Stewardship Policy, Environment management systems	CNDCP, EED, ISO14001	E1-2, E1-3, E1-4, E1-5, E1-6
	Cooling technology innovation (liquid cooling, closed-loop, adiabatic systems) piloted in new developments.	Ongoing	In pilot phase	WUE performance per site	Developments Delivery team, regional operations teams, Capex investment; R&D and pilot procurement.	Facility Design Policy, Engineering Innovation Tracker	Best available technologies (BAT)	E1-2, E1-3, E1-4, E1-5
	Heat Risk preparedness protocols in place for workforce, including ISO 45001 alignment and climate contingency planning.	Ongoing	In place	H&S incidents; heat alerts	H&S teams; ISO 45001 training.	H&S Management System, Supplier Code of Conduct	ISO 45001	E1-2, E1-3, E1-4, E1-5

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**Consolidated Table:** Climate change IROs, Policies, Actions, Targets, Metrics/KPIs and Governance

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI	RESOURCE ALLOCATION	INTERNAL POLICY / GOVERNANCE	EXTERNAL FRAMEWORK / STANDARD	DISCLOSURE REF.
<b>Climate transition costs</b>	Decarbonisation actions integrated into lifecycle Capex and developments' financial planning to mitigate transition cost risks.	Ongoing	In progress	% Capex aligned to climate transition (e.g. renewables procurement, energy and water efficiency)	Developments Delivery team, ESG Team input, Finance Team input.	Business Plan	TCFD	E1-1, E1-2, E1-3, E1-4, E1-5, E1-6
<b>Energy use</b>	Target for new data centres to meet maximum annualised PUE at full load of <1.2 (Europe), <1.4 (APAC), exceeding CNDCP requirements.	Ongoing	In place	PUE (design stage)	Infrastructure design teams.	Facility Design Policy	EU Energy Efficiency Directive, CNDCP; EU Code of Conduct for Energy Efficiency	E1-2, E1-3, E1-4, E1-5, E1-6, GRI 302
	Redevelopment target: existing data centres in cool climates to achieve PUE <1.3 by 2030.	2023–2030	In progress	Operational PUE	Developments Delivery team; PUE upgrades modelling, Regional operations teams, Retrofit Capex.	Facility Design Policy	EED, CNDCP	E1-2, E1-3, E1-4, E1-5, E1-6, GRI 302
	ISO 50001 Energy Management System implemented across all sites.	Ongoing	In place	Site energy intensity; audits	Regional operations teams, Environmental compliance team and external auditors.	Energy management system	ISO 50001	E1-2, E1-3, E1-4, E1-5, GRI 302
	Certification to the EU Code of Conduct for Energy Efficiency in Data Centres.	Ongoing	In place	Certification in place	Regional operations teams, Environmental compliance team and external auditors.	Energy management system	EU Code of Conduct for Energy Efficiency, ISO50001	E1-2, E1-3, E1-4, E1-5, GRI 302
	All new data centres to achieve minimum LEED Gold, BREEAM Excellent or local equivalent certification.	Ongoing	In place	% new buildings certified	Developments Delivery team; Green building experts; certification consultants.	Facility Design Policy	Green Building standards	E1-2, E1-3, E1-4, E1-5, E1-6, GRI 302
	All major renovations and fit-outs must achieve BREEAM Very Good or local equivalent, with the view of gradually certifying the entire portfolio to energy-efficient green building standards.	Ongoing	In place	% redevelopments certified	Retrofit teams; local cert planning.	Facility Design Policy	Green Building standards	E1-2, E1-3, E1-4, E1-5, E1-6

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## ENERGY CONSUMPTION, PUE AND METERING

(E1-7; GRI 302-1, 302-3, 302-4, 303-5; SASB IF-RE-130a.1, SASB IF-RE-130a.4)

Global Switch continued to optimise its energy mix in 2025 while supporting business growth across the portfolio. Total energy consumption increased to 985.6 thousand MWh in 2025, compared with 867.6 thousand MWh in 2024 and 792.2 thousand MWh in 2023, reflecting increased operational demand.

Renewable energy consumption totalled 864.1 thousand MWh in 2025, representing 88% of total energy consumption, compared with 90% in 2024 and 91% in 2023. The increase in the share of fossil fuel sources to 12% in 2025 (from 10% in 2024) was primarily driven by higher production and business growth at the Hong Kong data centre, which currently operates in a market without competitive access to renewable electricity procurement options. As a result, increased electricity demand at this site temporarily diluted the Group's overall renewable energy share. Notwithstanding this impact, the Group continues to prioritise renewable electricity procurement across its portfolio and to monitor market developments to enable future renewable sourcing where feasible.

ENERGY CONSUMPTION AND MIX (THOUSAND MWh)	2025	2024*	2023*
Fuel consumption from coal and coal products	-	-	-
Fuel consumption from crude oil and petroleum products	5.2	8.3	3.5
Fuel consumption from natural gas	1.8	1.7	2.9
Fuel consumption from other fossil sources	-	-	-
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources	114.5	80.9	68.7
<b>Total fossil energy consumption</b>	<b>121.5</b>	<b>90.9</b>	<b>75.1</b>
<b>Share of fossil sources in total energy consumption (%)</b>	<b>12%</b>	<b>10%</b>	<b>9%</b>
Consumption from nuclear sources	-	-	-
Share of consumption from nuclear sources in total energy consumption (%)	-	-	-
Consumption of purchased or acquired electricity from renewable sources	864.1	776.7	717.1
<b>Total renewable energy consumption</b>	<b>864.1</b>	<b>776.7</b>	<b>717.1</b>
<b>Share of renewable sources in total energy consumption (%)</b>	<b>88%</b>	<b>90%</b>	<b>91%</b>
<b>Total energy consumption</b>	<b>985.6</b>	<b>867.6</b>	<b>792.2</b>

\*2023 and 2024 figures have been restated to correct a calculation error identified during the current reporting period.

ANALYSIS OF RENEWABLE AND NON-RENEWABLE ELECTRICITY IN OUR OPERATIONS (% OF MWh)	2025	2024	2023
<b>Purchased renewable electricity</b>	88%	91%	92%
<b>Non-renewable electricity</b>	12%	9%	8%

ENERGY INTENSITY BASED ON NET REVENUE	UNIT	2025	2024	2023
<b>Total energy consumption</b>	thousand MWh	985.6	867.6	792.2
<b>Net revenue [A]</b>	£ million	466.2	436.6	482.2

[A] See "Consolidated Statement of Income" on page 9 in the Annual report 2025.

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### Power Usage Effectiveness (PUE)

PUE is used as a key metric to assess the operational energy efficiency of the Group’s data centres. In 2025, the Group achieved a group-wide operational average PUE of 1.61, representing a continued 8% year on year improvement compared with 1.66 in 2024 and 1.72 in 2023. This improvement reflects ongoing investments in infrastructure modernisation and cooling efficiency across the portfolio. Efficiency gains were primarily driven by the growth in demand and cooling infrastructure upgrades. These upgrades increased free-cooling potential, reduced electricity consumption and enabled more efficient thermal management. In addition, the Group’s data centres are designed with sufficient flexibility to support the installation of liquid-cooled IT equipment, enabling further energy efficiency improvements as customer technology requirements evolve. Across the portfolio, air-cooled plant is being progressively replaced with hybrid cooling systems that consume less electricity during peak environmental conditions. In addition, the Group’s data centres are designed with sufficient flexibility to support the installation of liquid-cooled IT equipment, enabling further energy efficiency improvements as customer technology requirements evolve.

All facilities were certified under the **EU Code of Conduct for Energy Efficiency in Data Centres** in late 2024/early 2025, further reinforcing the operational controls and monitoring structures that underpin our PUE targets, which include the existing certification of our Energy Management System in each facility to ISO 50001.

REGION	2025	2024	2023
<b>Group Average</b>	1.61	1.66	1.72
<b>Europe (EMEA)</b>	1.67	1.76	1.83
<b>Asia Pacific (APAC)</b>	1.52	1.56	1.56

### Customer submetering

In support of energy transparency, customer accountability, and effective management of Scope 2 emissions, Global Switch has implemented submetering and separate metering across its data centre portfolio. This enables more accurate allocation of electricity consumption and underpins performance monitoring and emissions reporting.

As of 31 December 2025:

- 100% of customers at our Paris, Madrid, Frankfurt, Singapore Woodlands and Hong Kong campuses are separately metered or submetered for grid electricity use.
- 97% of customers at Singapore Tai Seng and 90% at London campuses are separately metered or submetered.
- In Amsterdam, customer submetering is partially implemented, with further rollout planned.
- All new developments and major refurbishments incorporate customer submetering as a standard design requirement under the Facility Design Policy.

This submetering coverage supports customer access to granular energy-use data, enables ESG-aligned reporting and we are committed to increasing submetering coverage across the full portfolio.

### § ACCOUNTING PRINCIPLES

Non-renewable energy includes natural gas, diesel used in backup generators and purchased electricity in Hong Kong. Renewable energy includes all other electricity consumption across offices and data centres across all other geographies.

Conversion from litres and cubic metres to MWh was performed using the UK Government’s **Defra 2025 Fuel Conversion Factors**. Only purchased electricity is included; there is no on-site generation currently in operation.

**Power Usage Effectiveness (PUE)** is calculated as the ratio of total facility energy consumption to IT equipment energy consumption, based on metered data. Values are reported monthly and aggregated annually at both site and Group level.

## GROSS SCOPE 1, 2, 3 GHG EMISSIONS

(E1-8; GRI 305-1, 305-2, 305-3, 305-4; SASB IF-EU-110a.1)

In 2025, Global Switch's total GHG emissions reflect the combined impact of continued business growth, infrastructure expansion and enhanced completeness of Scope 3 reporting. While absolute emissions increased year-on-year, underlying performance trends show continued efficiency improvements in direct operations and greater transparency across the value chain.

### Scope 1

GHG emissions decreased by 26% and 41% compared to 2024 and 2023 respectively, driven primary by reduction of stationary consumption and refrigerant emissions, reflecting improved energy efficiency and refrigerant management.

### Scope 2

GHG location-based emissions remained broadly stable compared to 2024(-0.3%) and decreased by 7% compared to 2023, while market-based emissions increased by 32% and 56% respectively, reflecting business growth, due to higher energy demand across the Hong Kong data centre, the only one with no renewable electricity.

### Scope 3

GHG emissions increased by 6% compared to 2024, driven by a combination of activity growth and capital investment:

- **Category 1 Purchased goods and services** emissions increased by 16%, reflecting higher procurement volumes associated with business growth and ongoing data centre operations.
- **Category 2 Capital goods** emissions increased in line with expanded infrastructure investments and construction activity across the portfolio, reflecting continued development to support customer demand.
- **Category 3 Fuel and energy-related activities** emissions increased by 5% reflecting business growth, due to higher energy demand.

**Notable Exclusions:** Emissions from upstream transportation, sold products, and franchises remained zero, consistent with Global Switch's business model (non-product sales).

EMISSION (tCO <sub>2</sub> e)	LOCATION-BASED			MARKET-BASED			CHANGE 2024 vs 2025, %		CHANGE 2023 vs 2025, %	
	2023	2024	2025	2023	2024	2025	Location-based	Market-based	Location-based	Market-based
<b>Scope 1 GHG emissions:</b>	<b>4,480</b>	<b>3,582</b>	<b>2,643</b>	<b>4,480</b>	<b>3,582</b>	<b>2,643</b>	<b>-26%</b>	<b>-26%</b>	<b>-41%</b>	<b>-41%</b>
Stationary combustion	1,444	2,441	1,558	1,444	2,441	1,558	-36%	-36%	8%	8%
Refrigerants	3,036	1,141	1,085	3,036	1,141	1,085	-5%	-5%	-64%	-64%
<b>Scope 2 GHG emissions:</b>	<b>282,082</b>	<b>264,512</b>	<b>263,724</b>	<b>44,053</b>	<b>51,868</b>	<b>68,584</b>	<b>-0.3%</b>	<b>32%</b>	<b>-7%</b>	<b>56%</b>
Electricity usage	282,082	264,512	263,724	44,053	51,868	68,584	-0.3%	32%	-7%	56%
<b>Scope 3 GHG emissions:</b>	<b>173,768</b>	<b>152,699</b>	<b>162,307</b>	<b>70,626</b>	<b>103,524</b>	<b>111,746</b>	<b>6%</b>	<b>8%</b>	<b>-7%</b>	<b>58%</b>
Category 1: purchased goods and services	11,102	11,639	13,492	11,102	11,639	13,492	16%	16%	22%	22%
Category 2: capital goods	42,755	57,875	61,143	42,755	57,875	61,143	6%	6%	43%	43%
Category 3: fuel and energy-related activities	119,293	82,028	86,222	16,151	32,866	35,670	5%	9%	-28%	>100%
Category 4: upstream transportation and distribution	-	-	-	-	-	-	-	-	-	-
Category 5: waste generated in operations	6	8	2	6	8	2	-75%	-75%	-67%	-67%
Category 6: business travel	351	756	1,260	351	756	1,260	67%	67%	>100%	>100%
Category 7: employee commuting	252	290	170	252	290	170	-41%	-41%	-33%	-33%
Category 8: upstream leased assets	-	1	-	-	1	-	-100%	-100%	-%	-%
Category 9: downstream leased assets	9	102	18	9	89	9	-82%	-90%	>100%	-%
<b>Total Scope 1, 2 and 3</b>	<b>460,330</b>	<b>420,793</b>	<b>428,674</b>	<b>119,159</b>	<b>158,974</b>	<b>182,973</b>	<b>2%</b>	<b>15%</b>	<b>-7%</b>	<b>54%</b>

GHG INTENSITY PER NET REVENUE (tCO <sub>2</sub> e/£m)	2023*	2024	2025
<b>Total GHG emissions (location-based) per net revenue</b>	955	964	920
<b>Total GHG emissions (market-based) per net revenue</b>	247	364	392

Based on total Scope 1 + Scope 2 + Scope 3 emissions and reported net revenue (£466.2m in 2025; £436.6m in 2024; £482.2m in 2023).

*\*2023 and 2024 figures have been restated to correct a calculation error identified during the current reporting period.*

### CARBON REMOVALS AND OFFSETS

(E1-9; GRI 305-2, 305-5)

Global Switch does not currently use carbon removals or offsets to meet its GHG reduction targets. All progress toward emissions reductions is achieved through direct emission reduction measures, such as renewable energy procurement, energy efficiency improvements, refrigerant replacement, and supplier engagement. Our carbon reduction pathway currently excludes the use of offset mechanisms.

### INTERNAL CARBON PRICING

(E1-10)

Global Switch does not currently apply any internal carbon pricing mechanisms, such as shadow pricing, internal carbon fees, or cost-of-carbon assumptions within its financial planning, investment decisions, or Risk assessments. The Group's decarbonisation strategy is presently driven by regulatory compliance, science-based targets, and capital Allocation aligned with its GHG reduction roadmap. While internal carbon pricing is not currently in use, Global Switch continues to monitor evolving best practices and regulatory developments in this area.

### § ACCOUNTING PRINCIPLES

Our GHG inventory adheres to the Greenhouse Gas Protocol, covering Scopes 1, 2 & 3. These is our key methodological process:

- **Data Collection:** Activity data (e.g., energy consumption, spend amounts) was sourced from site-level records and centralised ledgers. Employee commuting relied on the extrapolated 2025 survey data.
- Global Switch discloses its greenhouse gas (GHG) emissions across Scopes 1, 2, and 3, consistent with the Greenhouse Gas Protocol. Scope 3 emissions are disaggregated in alignment with the GHG Protocol's 15 categories.
- **Scope 1 and 2 emission factors:** IEA 2025 were used. Renewable energy procurement was assumed to produce zero-emissions.
- **Scope 3 Categories emission factors:**
  - **Spend-Based Analysis:** Categories 1 (Purchased Goods) and 2 (Capital Goods) applied DEFRA spend-based factors, excluding taxes and energy (captured in Scopes 1-2).
  - **Activity-Based Calculations:** Business travel (Category 6) used flight/rail distances; waste (Category 5) followed EU disposal classifications.

- **Leased Assets:** Downstream emissions (Category 13) were apportioned by floor space (e.g. Victoria Office).

- **QA Process:** Calculations underwent tiered reviews by several consultants, ensuring alignment with GHG Protocol principles.

Boundary Consistency: Methodology mirrored 2024 where possible.

**Verification:** Scope 1-2 emissions were verified by MyCarbon; Scope 3 underwent verification by Fortiance.

All Scope 1 & 2 emissions are based on actual consumption directly stated on the invoice from the vendors/suppliers.

**Organisational Boundaries**

Operational Control Approach: All emissions are reported under Global Switch's operational control, including leased assets (e.g., corporate office). Included Entities: All operated data centres (London East, London North, Frankfurt, Amsterdam, Madrid, Paris, Singapore Tai Seng, Singapore Woodlands, Hong Kong).

**Data Hierarchy (Scope 3)**

The reported Scope 3 emissions are calculated using a tiered methodology based on data availability and quality. For purchased goods & services and capital goods, 100% of emissions are derived using spend-based calculations (Tier 3), applying industry-average emission factors due to lack of supplier-specific data. Emissions from waste generated in operations are fully (100%) calculated using activity-based data (Tier 2) derived from waste contractor reports detailing waste quantities and treatment methods. Business travel emissions are calculated entirely (100%) using supplier-provided mileage data (Tier 2), while employee commuting emissions are based entirely (100%) on employee survey data combined with standard emission factors (Tier 2). Downstream leased asset emissions are also calculated using activity-based data (Tier 2). Where primary data is unavailable, conservative estimation methods aligned with GHG Protocol standards are applied to ensure comprehensive coverage. All calculations use the latest applicable emission factors and are periodically reviewed for accuracy.



## WATER

Board-level responsibility	Managerial responsibility
COO	Group Delivery Director, Data Centre MDs (water stewardship, water resilience)

As responsible stewards of environmental resources, Global Switch continues to evaluate and manage the water-related impacts of our data centre operations. In 2025, water consumption and water withdrawals remain key risks, driving us to refine our monitoring practices and strengthen measures to minimise our operational footprint. By enhancing efficiency and resilience in our water management approach, we aim to protect local water systems while supporting sustainable, long-term business performance.

**Table:** Water-IROs

SUBTOPIC	IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN	TIME HORIZON
<b>Water consumption</b>	High water consumption for cooling may damage community relationships, reputational standing, or complicate license renewals or expansions, especially in regions with increasing water scarcity.	Risk	Upstream / Own Ops	2025 / 2026–2030 / 2031+
<b>Water withdrawals</b>	Large-scale water withdrawals for cooling operations may expose Global Switch to regulatory changes, increased water costs, and operational continuity risks if water availability is restricted.	Risk	Upstream / Own Ops	2025 / 2026–2030 / 2031+

### WATER IROs, POLICIES, ACTIONS, TARGETS AND GOVERNANCE

(E3-SBM3, E3-IRO-2, E3-1 to E3-3; GRI 3-2, 3-3, 303-1, 303-2; SASB IF-RE-140a.4)

Our DMA has identified two water-related risks as material to our business across the short-, medium-, and long-term time horizons. These risks could significantly affect our operations, potentially leading to disruptions, financial losses, and reputational damage. Specifically, high water consumption, particularly for cooling purposes, may strain relationships with local communities and harm our reputation, especially in regions facing water scarcity. Additionally, large-scale water withdrawals for cooling systems may increase exposure to regulatory changes, rising water costs, and operational risks if water availability becomes restricted. Operations in regions of high baseline water stress are increasingly dependent on secure and affordable third-party water supply. Our Facility Design Policy and Water Stewardship Policy include risk-based source diversification to ensure potable water use is reduced and for continuity of service. External alignment is ensured through ISO 14001 and the Climate Neutral Data Centre Pact (CNDPC)-aligned WUE targets.



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**Consolidated Table:** Water-IROs, Policies, Actions, Targets, Metrics/KPIs and Governance

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI	RESOURCE ALLOCATION	INTERNAL POLICY / GOVERNANCE	EXTERNAL FRAMEWORK / STANDARD	DISCLOSURE REF.
Water Consumption	Water use efficiency management is embedded in Global Switch's management systems with a lifecycle approach, including site water metering and some sites fitted/retrofitted with hybrid/closed-loop cooling to reduce water consumption.	Ongoing	In place (policy & metering & monitoring); In progress (retrofits)	Water use (m <sup>3</sup> )	Delivery & operations teams; retrofit engineering & Capex.	Environmental management system; Facility Design Policy, Water Stewardship Policy	EU Water Framework Directive, ISO 14001, CNDCP	E3-1, E3-2
	All new facilities have WUE targets to meet by design the CNDCP targets, based on Climate, Water Stress and Water Type. In existing facilities, the WUE is monitored with a view of being optimised as far as possible.	Ongoing	In progress	Site-level WUE (L/kWh);	Delivery & operations teams; retrofit engineering & Capex.	Facility Design Policy, Environmental management system, Water Stewardship Policy	EU Water Resilience Strategy, CNDCP, ISO/IEC 30134-9	E3-3
Water Withdrawals	Facility Design Policy mandates high water stress risk screening, alternative source integration (industrial, greywater, rainwater) where possible.	Ongoing	In place	Water withdrawals (m <sup>3</sup> ), use of other/non-potable water sources (m <sup>3</sup> )	Delivery & operations teams, water-sourcing Opex.	Facility Design Policy, Environmental management system, Water Stewardship Policy	EU Water Resilience Strategy	E3-1, E3-2

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## WATER WITHDRAWALS, DISCHARGES AND WUE METRICS

(E3-4; GRI 303-3 to 303-5; SASB IF-RE-140a.1 to 140a.3)

YEAR	MUNICIPAL POTABLE WITHDRAWAL (m <sup>3</sup> )	OTHER WITHDRAWAL (non-potable/reused) (m <sup>3</sup> )	TOTAL WITHDRAWAL (m <sup>3</sup> )	WATER STORED (m <sup>3</sup> )	SEWAGE DISCHARGE (m <sup>3</sup> )	WITHDRAWAL IN HIGH/EXTREME STRESS AREAS (m <sup>3</sup> )	% IN HIGH/EXTREME STRESS AREAS
2023	467,325	362,499	829,824	9,911	829,824	81,845 <sup>1</sup>	9.9%
2024	469,305	430,216	899,521	9,911	899,521	134,949 <sup>2</sup>	15.0%
2025	545,162	442,652	987,814	10,157	987,814	192,135 <sup>2</sup>	19.5%

1. In 2023, only Madrid was classified as an Extreme water-stress location.

2. From 2024, Madrid, London, Frankfurt are in High/Extremely High stress basins according to WRI Aqueduct Water Risk Atlas 2023.

In 2025, total Group water withdrawals increased to 987,814 m<sup>3</sup>, up from 899,521 m<sup>3</sup> in 2024, reflecting continued business growth, expanded data centre operations and higher cooling demand across the portfolio. The Group is working to reduce reliance on potable water supplies and enhance water resilience in water-stressed regions. All water withdrawals are sourced from third-party municipal suppliers. The Group does not directly abstract water from rivers, lakes or groundwater sources. No withdrawals were identified as impacting protected or sensitive ecosystems, based on site location mapping. Withdrawn water is discharged post-use, primarily via sewage systems. As a result, water consumption (i.e., non-returned water) remains limited and is largely attributable to evaporative losses associated with cooling processes.

### Water Usage Effectiveness (WUE)

WUE at Group level remained broadly stable in 2025, demonstrating that efficiency improvements and operational controls largely offset increased cooling demand associated with business growth. WUE for evaporative cooling remains higher than overall WUE, consistent with the use of water-based cooling systems at selected locations.

REGION / GROUP	METRIC	2023	2024	2025
Group	WUE (All water sources)	1.72	1.70	1.61
	WUE (Evaporative cooling only)	2.11	2.05	2.04
Europe	WUE (All water sources)	1.34	1.32	1.19
	WUE (Evaporative cooling only)	2.05	1.95	1.90
APAC	WUE (All water sources)	2.15	2.11	2.14
	WUE (Evaporative cooling only)	2.15	2.11	2.14

### ACCOUNTING PRINCIPLES

#### Data Collection & Validation

Global Switch captured annual water withdrawals, both municipal (potable) and non-potable/reused, via site-level meter readings and procurement records, which were consolidated in our central ESG platform.

#### Water-Stress Mapping

We classified each facility by its host city's Aqueduct Baseline Water Stress vs.2023 category (Low/

Medium, High, Extremely High) using WRI's published city-level scores. This approach aligned with our reporting geographies and was updated annually to reflect the latest Aqueduct data.

#### Stress-Area Withdrawal Calculation

For each reporting year, we summed withdrawals from cities in the High or Extremely High categories to derive "Withdrawal in Stress Areas" (m<sup>3</sup>) and expressed it as a percentage of total Group withdrawal.

#### Water Usage Effectiveness (WUE)

We measured WUE by dividing total annual withdrawal (all sources) by the Group's IT-energy consumption and separately tracked evaporative-cooling WUE. These metrics were updated quarterly to monitor efficiency improvements over time.

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## BIODIVERSITY AND ECOSYSTEMS

### Board-level responsibility

COO

### Managerial responsibility

Group Delivery Director, Data Centre MDs

Protecting biodiversity and ecosystems is an increasingly important element of Global Switch’s environmental responsibility, given the interconnected nature of climate change and ecological health. In 2025, our assessment identified biodiversity loss linked to our contribution to climate change as a key impact, guiding our efforts to reduce emissions and enhance the resilience of ecosystems. Through continued investment in low-carbon operations and alignment of our supply chains, and responsible site-level practices, we aim to minimise our ecological footprint and support the preservation of local and global ecosystems.

**Table:** Biodiversity and Ecosystems - IROs

SUBTOPIC	DESCRIPTION OF IRO	CLASSIFICATION	VALUE CHAIN	TIME HORIZON
<b>Climate change impact on biodiversity</b>	Global Switch impacts biodiversity and ecosystems through its contribution to climate change.	Actual Negative Impact	Upstream / Own Ops	2025 / 2026–2030 / 2031+

### BIODIVERSITY AND ECOSYSTEMS IROs, POLICIES, ACTIONS, TARGETS AND GOVERNANCE

(E4-SBM3, E4- IRO-2, E4-1 to E4-4; GRI 3-2, 3-3, 304-1)

Rising temperatures, altered precipitation patterns and increased frequency of extreme weather events contribute to habitat degradation, ecosystem shifts and species loss, as recognised by the Intergovernmental Panel on Climate Change and the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. Our DMA has identified the impact to biodiversity and ecosystems as material across the short-, medium-, and long-term time horizons. Our ISO14001- certified Environmental Management Systems is the framework through which we are working to mitigate the impacts as well as a new Biodiversity Policy and transition plan we aim to develop in 2026 to further support the resilience of biodiversity and ecosystems. Currently, none of our facilities are near biodiversity-sensitive areas.



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**Consolidated Table:** Biodiversity and Ecosystems - IROs, Policies, Actions, Targets, Metrics/KPIs and Governance

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI	RESOURCE ALLOCATION	INTERNAL POLICY / GOVERNANCE	EXTERNAL FRAMEWORK / STANDARD	DISCLOSURE REF.
CLIMATE CHANGE IMPACT ON BIODIVERSITY	Currently biodiversity and ecosystems impacts are managed through our ISO14001-certified Environmental Policy and managements systems with requirements embedded in the Supplier Code of Conduct for supply chain impacts. Additional measures and biodiversity enhancements are also carried out for new developments guided by the requirements of green building certifications such as BREEAM and LEED. These requirements relate to biodiversity net gains on new developments' sites as well as the procurement of materials certified to have minimised biodiversity impacts. These impacts can relate to ecosystem impacts, e.g., requirement for ISO14001 certification during the raw materials extraction and manufacturing phases, and deforestation impacts, e.g., requirement for FSC/PEFC certification of timber products during their production.	Ongoing	In place	-	Delivery & operations teams.	Environmental management system; Facility Design Policy, Supplier Code of Conduct, Green Building certification standards	ISO 14001	E4-2, E4-4
	Target for developing a biodiversity transition plan and a new Biodiversity Policy to further support and formalise our biodiversity management and enhancement actions and align with international frameworks.	2026	Planned	Policy to be in place	ESG team, Delivery & operations teams' input.	Environmental management system	TNFD, ISO 14001	E4-1, E4-4
	Target for creating a Responsible Supply Chain strategy and policy with requirements relating to the procurement of materials with impacts on biodiversity.	2026	Planned	Policy to be in place	ESG team, Procurement, Delivery & operations teams' input.	Environmental management system	ISO 14001	E4-4

**METRICS RELATED TO CLIMATE CHANGE AS A DRIVER OF BIODIVERSITY AND ECOSYSTEM CHANGE**

(E4-5)

Climate change has been identified through the double materiality assessment as a material driver of biodiversity and ecosystem change impacts. Global Switch measures and monitors its contribution to this driver through the Scope 1, 2 and 3 CO2e emissions metrics, disclosed in detail under section E1 Climate Change in this report.

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## RESOURCE USE AND CIRCULAR ECONOMY

Board-level responsibility	Managerial responsibility
COO	Group Operations Director, Group Delivery Director

Efficient and responsible resource use is essential to Global Switch’s ability to operate sustainably and support a more circular digital infrastructure ecosystem. We recognise the key value of efficient management of finite resources use and of the circular economy model. By improving material efficiency, enhancing recovery and recycling pathways, and exploring innovative heat reuse solutions, we aim to reduce our environmental footprint while strengthening long-term operational resilience.

**Table:** Resource use and circular economy - IROs

SUBTOPIC	DESCRIPTION OF IRO	CLASSIFICATION	VALUE CHAIN	TIME HORIZON
<b>Raw Material Use</b>	High demand for raw materials and minerals (e.g., steel, concrete, rare earths) for construction and fit-out contributes to ecosystem degradation and embedded emissions.	Actual Negative Impact	Upstream / Own Ops	2025 / 2026–2030 / 2031+
<b>Critical Minerals Dependency</b>	Dependence on scarce inputs (e.g., rare earths) in tech infrastructure creates supply risk, volatility, and cost exposure.	Risk	Upstream	2025 / 2026–2030 / 2031+
<b>End-of-Life Waste</b>	Construction waste and decommissioned IT equipment may contribute to landfill, waste treatment burdens, and lost circular value.	Actual Negative Impact	Own Ops / Downstream	2025 / 2026–2030 / 2031+

### RESOURCE USE AND CIRCULAR ECONOMY IROs, POLICIES, ACTIONS, TARGETS AND GOVERNANCE

(E5-SBM-3, E5-IRO-2, E5-1 to E5-5; GRI 3-2, 3-3, 301, 306-1 to 306-2)

In 2025, we have assessed the issues related to raw material use, critical minerals dependency, and end-of-life waste, alongside opportunities to manage waste heat more effectively across our operations as material for Global Switch. These IROs have financial implications in terms of operational costs, procurement stability, reputational exposure, and alignment with long-term decarbonisation and resource efficiency goals. Global Switch’s circularity strategy, embedded in its Facility Design Policy, includes efforts to increase material recovery, integrate circular design, and explore waste heat reuse solutions.



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**Consolidated Table:** Resource use and circular economy - IROs, Policies, Actions, Targets, Metrics/KPIs and Governance

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI	RESOURCE ALLOCATION	INTERNAL POLICY / GOVERNANCE	EXTERNAL FRAMEWORK / STANDARD	DISCLOSURE REF.
Raw Material Use	Recycled content prioritised in materials procurement as part of Green Buildings' certification requirements for new developments and major redevelopments; whole lifecycle assessments required by Facility Design Policy for all new developments and major renovations.	Ongoing	In place	% of projects with WLCAs carried out at design stage	Delivery & procurement teams; Capex via project budgets.	Facility Design Policy;	Green Building certification standards, ISO 14001	E5-1, E5-2
	Develop and deploy circular design guidelines for products through the Responsible Materials Sourcing Policy planned for 2026.	2026	Under development	% of projects applying circular design	Delivery & operations teams; retrofit Capex.	Facility Design Policy;	ISO 14001, EU Circular Economy Action Plan	E5-1, E5-2
Critical Minerals Dependency	Circularity screening of Tier 1 suppliers to reduce exposure to mineral scarcity and sourcing risks is planned for 2026 as part of the development of the Responsible Supply Chain strategy.	2026	Integration ongoing in supplier evaluation tools	% of suppliers evaluated for circularity risks	Delivery, Procurement & ESG team; Capex where needed.	Supplier Code of Conduct; ESG Steering Group	OECD Due Diligence Guidance	E5-1, E5-2, E5-3
End-of-Life Waste	Reuse of materials and if not possible then diversion from landfill is currently the approach Global Switch uses for waste management and also as part of Green Buildings' certification requirements for new developments and major redevelopments.	Ongoing	In place	-	Developments Delivery team, regional operations teams, construction and facilities management or waste management contracts;	Environmental Policy	Green Building certification standards, ISO 14001, EU Circular Economy Action Plan	E5-1, E5-2
	100% diversion from landfill of all waste types (construction, operations, maintenance, end-of-life) by 2030.	2024–2030	In progress	% total waste diverted	Developments Delivery team, regional operations teams, integration in systems construction and facilities management or waste management contracts;	Environmental management system	EU Circular Economy Action Plan, Green Building certification standards	E1-6, E5-3
	Target for developing a Waste Policy, strategy and plan on waste management.	2026	Under development	Policy to be in place	ESG Team, delivery and operations teams input; integration in systems.	Environmental management system	EU Circular Economy Action Plan	E5-3
Waste Heat	Provision for waste heat recovery is included in all new data centre designs.	Ongoing	In place	% facilities designed with recovery systems	Developments Delivery team; integration in systems, financial planning.	Facility Design Policy	CNDCP, EED, ISO 50001	E1-4, E1-5, E5-3, GRI 302
	Target for existing facilities to carry out a feasibility study for waste heat recovery.	2026	In progress		Delivery and operations teams; external consultants; retrofit Capex.	Environmental management system	CNDCP, EED, ISO 50001	E5-3, GRI 302

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**MATERIALS USE**

(E5-4; GRI 301)

Global Switch does not yet systematically collect or consolidate quantitative data on material use (e.g., tonnes of steel, concrete, or packaging) or the recycled content of those materials across its construction and refurbishment activities. Projects certified under schemes such as BREEAM, LEED, or Green Mark include recycled content minimums and lifecycle analysis requirements, but the data is not yet aggregated at Group level. The Group is currently assessing internal systems and supplier data availability to enable reporting against it the next 12-18 months. Efforts to embed circular design principles into capital projects are led by the ESG Steering Group in coordination with engineering and procurement functions. BREEAM/LEED certification processes are used as a proxy for the circularity of inputs during the current transition phase.

**END-OF-LIFE WASTE**

(E5-5; GRI 306-3 to 306-5; SASB TC-TL-440a.1)

**Table: Waste by composition in metric tons**

	WASTE GENERATED 2025 (t)	WASTE GENERATED 2024 (t)*	WASTE GENERATED 2023 (t)*	WASTE DIVERTED FROM DISPOSAL 2025 (t)	WASTE DIVERTED FROM DISPOSAL 2024 (t)*	WASTE DIVERTED FROM DISPOSAL 2023 (t)*	WASTE DIRECTED TO DISPOSAL 2025 (t)	WASTE DIRECTED TO DISPOSAL 2024 (t)*	WASTE DIRECTED TO DISPOSAL 2023 (t)*
Batteries & Accumulators	0.3	0.3	0.8	0.3	0.3	0.8	-	-	-
Construction/Demolition Waste	493.7	51.9	65.1	400.2	37.9	41.7	93.5	14.0	23.4
Electronic Waste (WEEE), incl fluorescent lamps	4.9	6.3	2.7	4.9	6.3	2.7	-	-	-
Food & Organic Waste	1.4	0.1	-	1.4	0.1	-	-	-	-
Fridges	0.2	-	-	0.2	-	-	-	-	-
General Residual / Mixed Waste	149.4	180.0	156.6	2.7	29.8	24.6	146.7	150.2	132.0
Glass	0.1	0.1	-	0.1	0.1	-	-	-	-
Metals (scrap, ferrous/non-ferrous)	-	42.5	0.1	-	42.5	0.1	-	-	-
Oils, Solvents & Chemicals	15.7	4.1	0.3	-	-	-	15.7	4.1	0.3
Other Hazardous	23.4	45.2	56.8	5.6	5.6	18.0	17.8	39.6	38.8
Paper & Cardboard	70.3	47.2	32.6	70.3	47.2	32.6	-	-	-
Plastics	16.3	8.2	2.5	16.0	8.1	0.9	0.3	0.1	1.6
Wood (untreated + pallets)	45.8	31.7	37.3	35.1	14.6	25.5	10.7	17.1	11.8
<b>TOTAL (t)</b>	<b>821.5</b>	<b>417.6</b>	<b>354.8</b>	<b>536.8</b>	<b>192.5</b>	<b>146.9</b>	<b>284.7</b>	<b>225.1</b>	<b>207.9</b>

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**Table:** Waste diverted from disposal by recovery operation, in metric tons (t)

	OFFSITE TREATMENT (t) 2025	OFFSITE TREATMENT (t) 2024*	OFFSITE TREATMENT (t) 2023*
<b>HAZARDOUS WASTE</b>			
Recycling	5.7	6.7	3.5
<b>TOTAL</b>	<b>5.7</b>	<b>6.7</b>	<b>3.5</b>
<b>NON HAZARDOUS WASTE</b>			
Recycling	529.7	185.7	143.4
Anaerobic digestion	1.4	0.1	-
<b>TOTAL</b>	<b>531.1</b>	<b>185.8</b>	<b>143.4</b>

No onsite treatment of waste was recorded

**Table:** Waste directed to disposal by disposal operation, in metric tons (t)

	WASTE DIRECTED TO DISPOSAL (t) 2025	WASTE DIRECTED TO DISPOSAL (t) 2024*	WASTE DIRECTED TO DISPOSAL (t) 2023*
<b>HAZARDOUS WASTE</b>			
Incineration (with energy recovery)	-	11.9	0.3
Incineration (without energy recovery)	16.9	6.2	-
Landfilling	-	-	-
<b>TOTAL</b>	<b>16.9</b>	<b>18.1</b>	<b>0.3</b>
<b>NON HAZARDOUS WASTE</b>			
Incineration (with energy recovery)	267.8	154.2	182.6
Incineration (without energy recovery)	-	52.8	4.5
Landfilling	-	-	20.5
<b>TOTAL</b>	<b>267.8</b>	<b>207.0</b>	<b>207.6</b>

**Diversion from Landfill**

2023\*: 92.9%

2024\*: 85.9%

2025: 97.9%

**§ ACCOUNTING PRINCIPLES**

Our calculation is based on data available during the reporting period, from each individual facility. The data set does not include waste from new development construction activity as that is not centrally collected currently. The available data formed a basis for estimating the total weight of our generated waste for the whole Group. Furthermore, most data are based on the datasets provided by our waste-treatment partners, who have not always specified which waste type has been recycled or incinerated. Each available dataset has been investigated, and for the ones where the treatment method was missing, a conservative approach was taken assuming landfilling or incineration without energy recovery. The categorisation of wastes in waste streams was done according to EWC.

In 2024 a total of 5,065 EUR of spend for waste treatment was included in the waste reports and it was included in the carbon footprint calculations (for Scope 3 – Waste generated in operations), but it is not reflected on the table above.

Landfill diversion rate is calculated as total waste generated minus disposed of via landfill, divided by total waste generated.

\*2023 and 2024 figures have been restated to reflect improved data completeness and methodological refinement identified during the 2025 reporting period.

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## OWN WORKFORCE

### Board-level responsibility

Group HR Director

### Managerial responsibility

Group HR Director,  
Health & Safety Manager

Global Switch’s workforce remains at the core of our ability to deliver resilient, secure, and sustainable data centre operations. In 2025, we strengthened our commitment to creating a safe, inclusive, and high-performing workplace where our people can thrive and develop the skills needed for the future. Our ongoing focus on employee wellbeing, capability building, and an engaged organisational culture underpins our long-term success and supports our broader sustainability goals.

### OWN WORKFORCE - IROs, POLICIES, ENGAGEMENT, ACTIONS, TARGETS AND GOVERNANCE

(S1-IRO to 2, S1-SBM-3, S1-1 to S1-4; GRI 2-7, 2-8, 2-30, 3-2, 3-3, 401-1, 402 to 405-1)

Global Switch identifies material own workforce-related IROs through its Double Materiality Assessment. Global Switch has established policies that support the fair treatment, wellbeing and development of its workforce.

Insights gathered from employee engagement surveys, engagement forums and other feedback mechanisms, see the **Stakeholder Engagement** section, are used to inform and continuously improve these policies. This feedback helps identify workforce needs and influences the design of training programmes, DEI initiatives and wellbeing actions, demonstrating how workers’ perspectives are embedded into the Group’s approach to managing social impacts and supporting a positive working environment. The policies aim to ensure equitable treatment, support career development and reinforce a culture grounded in wellbeing, inclusion and fairness.

Workforce-related targets are set in alignment with Global Switch’s policies on inclusion, wellbeing and fair treatment to foster a happier, healthier and high-performing workforce. Progress against these targets is monitored throughout the year, and the Group continues to enhance consistency in the measurement and review of workforce-related indicators.



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**Table:** Own Workforce – IROs

IRO SUBTOPIC	MATERIAL IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN LOCATION	TIME HORIZON
<b>Secure employment of our employees</b>	Secure employment promotes job stability and financial security for employees, supporting livelihoods and local economic resilience.	Actual Positive Impact	Own Operations	2025 / 2026–2030 / 2031+
<b>Adequate wages for our employees</b>	Fair and adequate wages reduce economic stress and improve motivation, job satisfaction and retention.	Actual Positive Impact	Own Operations	2025 / 2026–2030 / 2031+
<b>Freedom of association</b>	Freedom of association enables employees to organise, express concerns and engage in collective advocacy, enhancing workplace rights and participation.	Actual Positive Impact	Own Operations	2025 / 2026–2030 / 2031+
<b>Work-life balance for our employees</b>	Work-life balance can reduce stress and mental health challenges, improving employee morale and performance.	Potential Positive Impact	Own Operations	2025 / 2026–2030 / 2031+
<b>Training &amp; skills of our employees (Impact)</b>	Training and skills development build employee competencies, improve job performance and support career growth.	Actual Positive Impact	Own Operations	2025 / 2026–2030 / 2031+
<b>Training &amp; skills of our employees (Opportunity)</b>	Training and ongoing upskilling in a fast-evolving industry can positively impact staff productivity and reduce staff turnover as the businesses is dependent on a skilled workforce.	Opportunity	Own Operations	2025 / 2026–2030 / 2031+
<b>Diversity of our employees</b>	Lack of diversity can hinder talent attraction and retention, limit innovation and deter investors and customers, impacting access to and cost of capital.	Risk	Own Operations	2025 / 2026–2030 / 2031+

**Consolidated Table: Own Workforce – IROs, Policies, Actions, Targets, Engagement and Governance**

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<p><b>SECURE EMPLOYMENT</b></p> <p><b>Resource Allocation</b> HR team, Health and Safety Manager, Legal team</p> <p><b>Internal Policy / Governance</b> GS Employee Handbook, Code of Conduct, Equal Opportunities Policy, Health and Safety Policy, Grievance Policy, Whistleblowing Policy</p> <p><b>External Framework / Standard</b> ISO 45001</p> <p><b>Disclosure Ref.</b> S1-1 to S1-4, S1-10, S1-13, GRI 401-2</p>	<p>Global Switch, through a number of policies and actions, creates a secure employment environment. These include: a structured recruitment approach, written employment agreements that employees are free to terminate upon providing standard notice periods, a code of conduct an employee handbook which mandate respect for human rights. Global Switch utilises a multifaceted approach to engage its employees and inform its target setting (as described in the <b>Stakeholder Engagement</b> section), has in place a health and safety system for occupational risks as well as grievance, and whistleblowing mechanisms (see <b>Stakeholder Engagement</b> section).</p> <p>All Global Switch employees are covered by social protection against loss of income due to major life events through public programmes or through benefits offered by Global Switch.</p> <p>All eligible employees receive a competitive benefits package tailored to national frameworks. In most regions, this includes:</p> <ul style="list-style-type: none"> <li>– Pension and life insurance contributions</li> <li>– Private medical coverage</li> <li>– Paid sick leave and maternity/paternity leave, incl. adoption leave</li> <li>– Bereavement leave, IVF and antenatal support</li> <li>– Counselling and coaching via the MYNDUP wellbeing platform</li> </ul>	<p>Ongoing</p>	<p>In place</p> <p>In 2025, Global Switch <b>reviewed and updated</b> its family- and health-related policies, including provisions for carers leave and neonatal loss. The Group also introduced additional support mechanisms such as wedding leave and fertility-related support, often exceeding statutory requirements.</p>	<p>-</p>
<p><b>ADEQUATE WAGES</b></p> <p><b>Resource Allocation</b> HR team</p> <p><b>Internal Policy / Governance</b></p> <p><b>External Framework / Standard</b> Willis Towers Watson (WTW) benchmark</p> <p><b>Disclosure Ref.</b> S1-9, GRI 202-1</p>	<p>Committed to fair and competitive remuneration, aligned with local market conditions and the strategic needs of the business. To support wage fairness, Global Switch engages an independent benchmarking tool.</p>	<p>Ongoing</p>	<p>In place</p>	<p>Annual review process in place.</p>
	<p>In 2026 a programme of communications to focus on employees and their families, health and financial wellbeing will be launched. It aims to encourage employees to look after their wellbeing and to know support is available when required.</p>	<p>To be launched in 2026</p>	<p>Planned</p>	<p>Programme to be in place.</p>

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**Consolidated Table:** Own Workforce – IROs, Policies, Actions, Targets, Engagement and Governance



IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI												
<p><b>FREEDOM OF ASSOCIATION</b></p> <p><b>Resource Allocation</b> HR team</p> <p><b>Internal Policy / Governance</b></p> <p><b>External Framework / Standard</b> ILO</p> <p><b>Disclosure Ref.</b> S1-7, GRI 2-30</p>	<p>Recognition of the right of all employees to organise, join trade unions, and participate in social dialogue.</p>	<p>Ongoing</p>	<p>Works councils in Paris and Frankfurt (where legally required).</p> <table border="1" data-bbox="1472 396 1847 572"> <thead> <tr> <th data-bbox="1472 396 1592 415">Coverage Rate</th> <th data-bbox="1600 396 1702 415">CBA</th> <th data-bbox="1709 396 1847 415">Social Dialogue</th> </tr> <tr> <th colspan="2" data-bbox="1600 444 1702 462">2025</th> <th data-bbox="1709 444 1847 462">2025</th> </tr> </thead> <tbody> <tr> <td data-bbox="1472 476 1592 495">0–19%</td> <td data-bbox="1600 476 1702 519">France, Germany</td> <td data-bbox="1709 476 1847 495">France, Spain</td> </tr> <tr> <td data-bbox="1472 534 1592 552">&gt;20%</td> <td data-bbox="1600 534 1702 552">None</td> <td data-bbox="1709 534 1847 552">None</td> </tr> </tbody> </table> <p>There were no known violations or disputes regarding these rights in 2025.</p>	Coverage Rate	CBA	Social Dialogue	2025		2025	0–19%	France, Germany	France, Spain	>20%	None	None	<p>Works councils and social dialogue processes in operation.</p> <p>Collective Bargaining Agreement (CBA) coverage %.</p> <p>Number of any incidents of violations or disputes.</p>
Coverage Rate	CBA	Social Dialogue														
2025		2025														
0–19%	France, Germany	France, Spain														
>20%	None	None														
<p><b>WORK–LIFE BALANCE</b></p> <p><b>Resource Allocation</b> HR team</p> <p><b>Internal Policy / Governance</b> Flexible Working Policy, France RTT scheme, Agile Working (informal guidelines, for request to line manager via Workday), Stress Management Policy, Maternity Leave Policy, Paternity Leave Policy, Myndup wellbeing support</p> <p><b>External Framework / Standard</b> -</p> <p><b>Disclosure Ref.</b> S1-14</p>	<p>Global Switch provides all employees with access to family-related leave, including maternity, paternity, adoption, parental, carers, bereavement, and neonatal leave.</p>	<p>Ongoing</p>	<p>In place or under development.</p>	<p>Processes in place.</p>												

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**Consolidated Table:** Own Workforce – IROs, Policies, Actions, Targets, Engagement and Governance



IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<p><b>TRAINING &amp; SKILLS OF OUR EMPLOYEES (Impact)</b></p> <p><b>Resource Allocation</b> HR team, Line Managers, Learning Management System, learning platforms</p> <p><b>Internal Policy / Governance</b> Equal Opportunities Policy, Quality Management Policy</p> <p><b>External Framework / Standard</b> ISO 9001</p> <p><b>Disclosure Ref.</b> S1-12</p>	<p>Onboard a new Learning Management System (LMS) to enhance the learner experience and learning KPI data.</p> <p>In early 2026, Global Switch recruited a dedicated Learning and Development Manager to strengthen our onboarding experience and ensure all employees have access to consistent, high-quality learning opportunities.</p>	<p>Planned</p>	<p>New LMS planned by 2027.</p>	<p>Processes in place.</p>
<p><b>TRAINING &amp; SKILLS OF OUR EMPLOYEES (Opportunity)</b></p> <p><b>Resource Allocation</b> HR team</p> <p><b>Internal Policy / Governance</b> Employee Handbook chapter on Learning and Development, Talent Review Toolkit</p> <p><b>External Framework / Standard</b> -</p> <p><b>Disclosure Ref.</b> S1-12</p>	<p>As above</p> <p>Build capability aligned to business priorities and drive fairness and alignment in performance cycles using the Talent Review Toolkit relaunched in 2025.</p>	<p>Ongoing</p>	<p>In place</p> <p>100% of employees participated in performance and career development reviews.</p>	<p>% of employee participation in performance and career development reviews.</p>

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**Consolidated Table:** Own Workforce – IROs, Policies, Actions, Targets, Engagement and Governance



IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<p><b>DIVERSITY &amp; INCLUSION</b></p> <p><b>Resource Allocation</b> HR team</p> <p><b>Internal Policy / Governance</b> Equal Opportunities Policy, Anti-Harassment Policy</p> <p><b>External Framework / Standard</b> -</p> <p><b>Disclosure Ref.</b> S1-8, S1-11, GRI 405-1</p>	<p>Global Switch is committed to fostering an inclusive workplace, in which all employees can thrive.</p>	Ongoing	In place	% female employees.
	<p>Discrimination of any kind is strictly prohibited, including a person’s race, colour, nationality or ethnic / national origin, age, religion or belief, disability status, gender, sexual orientation, gender identity or gender reassignment, pregnancy / maternity or marital or civil partner status.</p>			% of ethnic minorities.
	<p><b>Engagement with underrepresented or vulnerable groups initiatives:</b> Global RESPECT Committee Women of Global Switch initiative</p>	Ongoing	In place	Processes in place.
	<p><b>Diversity training:</b> All new employees receive training on the following:</p> <ul style="list-style-type: none"> <li>- Code of Conduct</li> <li>- Anti-Harassment Policy</li> <li>- Equal Opportunities Policy</li> <li>- Whistleblowing Policy</li> <li>- Capability Policy</li> <li>- Grievance Policy</li> </ul> <p>Training is delivered in English and local languages as needed and is required upon onboarding. Refresher training is provided through policy updates and training cycles.</p>	Ongoing	In place	% training completion rate.
	<p><b>People with Disabilities:</b> The inclusion of persons with disabilities is an integral part of the Group’s broader diversity, equity and belonging (DEI&amp;B) approach. Disability and non-discrimination are explicitly addressed in the Group’s Equal Opportunities Policy, which prohibits discrimination on the basis of physical, sensory, cognitive or other forms of disability.</p>	Ongoing	People with disabilities (self-declared) represented 1 % of employees in 2025.	% people with disabilities.
<p><b>Diverse recruitment processes:</b> Reinforcement of DEI-informed recruitment and inclusive job design practices via the use of TeamTailor digital platform’s structured and anonymised applications.</p>	To be launched in 2026	Planned	Processes in place.	








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## CHARACTERISTICS OF EMPLOYEES AND NON-EMPLOYEES

(S1-5 to S1-6; GRI 2-7 to 2-8, 401-1)

### Employee headcount by geography, gender and type

As of 31 December 2025, Global Switch had 324 employees by headcount. The tables to the right show the breakdown of Global Switch's employees by geography, gender and employee type.

EMPLOYEE HEADCOUNT BY COUNTRY	2025 TOTAL	2025 FEMALE	2025 MALE	2024
 United Kingdom	161	52	109	125
 Singapore	53	19	34	53
 Hong Kong	28	7	21	32
 Germany	22	3	19	25
 Netherlands	22	4	18	27
 France	21	7	14	24
 Spain	17	3	14	20
<b>Total employee headcount</b>	<b>324</b>	<b>95</b>	<b>229</b>	<b>306</b>

EMPLOYEE AND NON-EMPLOYEE HEADCOUNT BY GENDER AND TYPE	2025 FEMALE	2025 MALE	NOT REPORTED	2024
Permanent	94	227	-	304
Temporary	1	2	-	-
Non-guaranteed hours	-	-	-	-
Non-employees	3	7	-	4
<b>Total employee and non-employee</b>	<b>98</b>	<b>236</b>	<b>-</b>	<b>308</b>

AVERAGE HEADCOUNT	2025
Female	84
Male	205

EMPLOYEE TURNOVER	2025 NUMBER OF LEAVERS	2025 RATE	2024 NUMBER OF LEAVERS	2024 RATE
Voluntary attrition	35	12%	36	11%
Involuntary exits	33	12%	22	8%
<b>Employee turnover</b>	<b>68</b>	<b>24%</b>	<b>58</b>	<b>19%</b>

The slight increase in staff turnover in 2025 reflects the transformation and centralisation of internal functions, including related organisational changes undertaken during the year.

### § ACCOUNTING PRINCIPLES

Headcount data reflects the number of individual employees on payroll at year-end.

Employees' start and exit dates are based on employment dates. Temporary employees (those working for a defined period) are excluded as they have come to the end of their contract rather than leaving voluntarily or due to dismissal, retirement, or death in service.

**Average headcount** metrics were calculated as follows:

- the number of employees means the average number of persons employed by the Group in the year, determined as follows:
- for each month of the reporting period, the number of employees employed under contracts of service is determined, respectful of whether employment covered the full month or part of the month;
- monthly employee figures are aggregated for the full reporting period, and
- divided by the number of months in the reporting period.

**Voluntary attrition** = number of resignations submitted by employees during the year ÷ average headcount

**Employee turnover rate** is calculated as a percentage of the number of employees who left (voluntary and involuntary) in the reporting period over the average headcount.

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**DIVERSITY METRICS**

(S1-8; GRI 405-1)

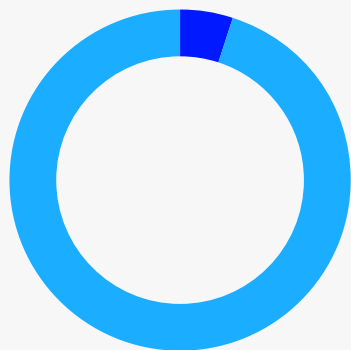
**Workforce Diversity**

The tables below show the gender distribution in terms of number and percentage at the top management level, the diversity of employees by age group and the gender distribution in terms of number and percentage per employee category.

**GENDER DISTRIBUTION OF TOP MANAGEMENT**

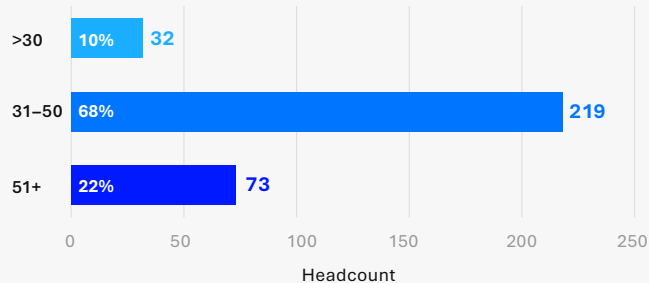
Top management level headcount

Female	1	18
Male	5%	95%

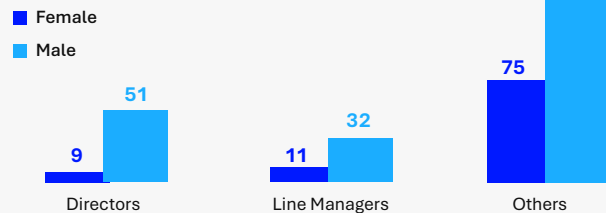


Top management level: Global Switch Leadership Executive (GSLE) and employees in senior management roles one level below GSLE. Global Switch Leadership Executive (Female: 0, Male: 5) and Senior Management (Female: 1, Male 13).

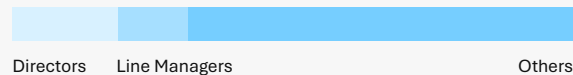
**EMPLOYEES BY AGE GROUP 2025**



**GENDER BY ROLE CATEGORY**

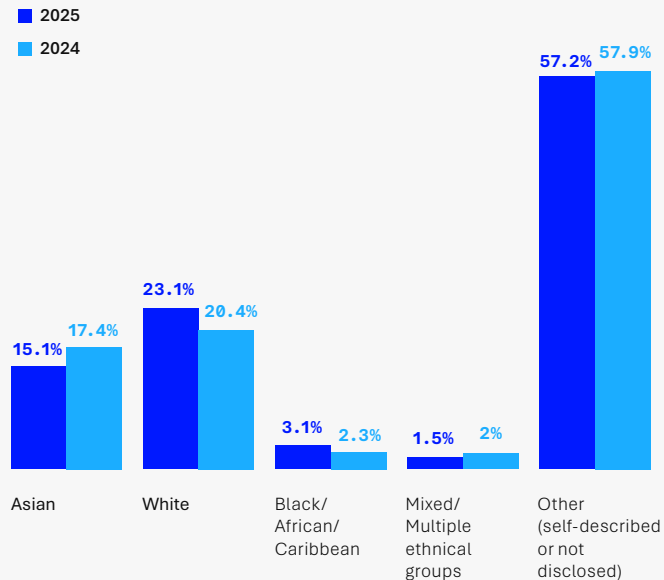


**PERCENTAGE OF HEADCOUNT**



As of 31 December 2025, women made up 29% of Global Switch’s workforce (95 out of 324 employees), with 19% representation at Director and line management roles.

**ETHNIC DIVERSITY OF EMPLOYEES**



**ACCOUNTING PRINCIPLES**

- Gender is based on HR system data. Role categories (Director, Line Manager, Other) are determined by job grade.
- Ethnic diversity data is self-reported and collated via GlobalSwitch’s HR platform (Workday).
- Governance body gender composition was derived from official Board records. No additional demographic data (e.g., age, ethnicity, nationality) is currently collected for Board or Executive Committee members.

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**TRAINING AND SKILLS DEVELOPMENT METRICS**

(S1-12; GRI 404-1 to 404-3)

We invest in developing our people in a number of ways, from internal and external training programmes to industry qualifications, workshops, and information sharing. We also actively encourage our employees to attend industry events to stay well-connected to the data centre sector.

**Career and development reviews**

In 2025, **100% of employees** participated in a structured annual performance review process that included a self-assessment and manager-led development discussion.

- Development actions were tailored for key talent
- **Thomas Assess** employee assessment and evaluation tools for onboarding and role transitions
- **Succession planning** undertaken for critical leadership roles

**Training and skills development programmes**

Global Switch proactively manages a potential future risk of skilled labour shortage in the data centre sector through structured training and skills development programmes. The Group provides targeted induction, role specific skills training and ongoing quality awareness programmes to ensure employees maintain the competencies required for resilient operations. The Quality Management Policy commits Global Switch to ensuring all staff and contractors understand their responsibilities and receive appropriate skills training to support continued professional growth and employability, strengthening internal capability in a competitive labour market.

At a senior level, we invest in developing our leadership and management team, which plays a crucial role in our success. This includes creating tailored development plans for key talent, as well as formulating clear succession plans for critical leadership roles. **Leadership development** programmes focused on staff development, supportive management practices and difficult conversations, 360 Leadership Feedback, Practical Line Management training, presentation skills training

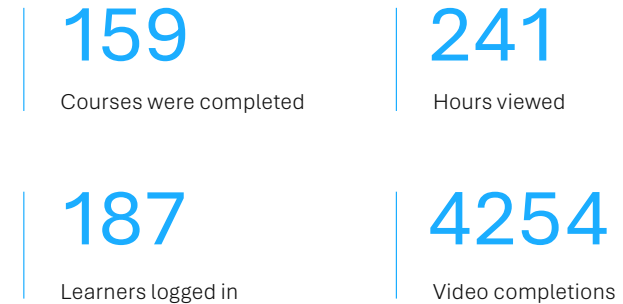
- 33% of line managers completed Situational Leadership (SLII) training
- 42% of line managers completed Practical Line Management training

Across the Group, every employee has the opportunity to create a personalised development plan based on their skills and experience and how they wish to grow their career at Global Switch. This information is used during the annual performance review and feeds into the objectives setting for the year ahead.

Training and skills development programmes delivered included:

**LinkedIn Learning**

**All employees are given the opportunity to use LinkedIn Learning:**



**The most popular LinkedIn Learning content amongst employees in 2025 was:**

- Giving and Receiving Feedback
- Project Management Foundations
- Visualizing your leadership journey
- Strategic HR
- Setting team and employee goals using SMART goals
- Leading and motivating people with different personalities

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**Technical and regulatory training**

delivered centrally to all employees or locally (e.g. ISO standards)

**MYNDUP wellbeing platform**

(mental health, resilience, financial wellbeing and professional coaching)

**Upskilling**

courses to support alignment with the business objectives and values, such as:

- Modern Slavery
- H&S training – Manual Handling, Slips-Trips-Falls, Display Screen Equipment (DSE)
- Sexual Harassment
- Effective Interviewing Techniques
- Bullying & Harassment for People Managers
- Cyber Security and Information Security Training

**§ ACCOUNTING PRINCIPLES**









Data includes mandatory training as well as any other training of staff (skills based, leadership, etc.). Training metrics were sourced from site-level HR data covering Amsterdam, Frankfurt, Hong Kong, London, Madrid, Paris and Singapore. Each site provided the number of employees trained by gender, total training hours completed. These values were manually calculated as:

Total hours completed ÷ number of employees trained (by gender and site)

All figures relate to employees under Global Switch’s operational control, consistent with the reporting boundary set out in Section About this Report - Basis for Preparation.

LinkedIn data was extracted from the LinkedIn Learning platform.

**Table:** 2025 Training Metrics (by location and gender)

SITE	TOTAL TRAINED	TOTAL HOURS	AVG. MALE (HRS)	AVG. FEMALE (HRS)	AVG. (HRS)
 <b>Amsterdam (AMS)</b>	22 (18M / 4F)	843.5	35.2	52.5	38.3
 <b>Frankfurt (FRA)</b>	22 (19M / 3F)	440.0	22.3	5.7	20.0
 <b>Hong Kong (HKG)</b>	28 (21M / 7F)	370.0	16.8	2.4	13.2
 <b>London (LON)</b>	29 (25M / 4F)	908.0	32.4	24.8	31.3
 <b>Madrid (MAD)</b>	17 (14M / 3F)	410.5	24.6	22.2	24.1
 <b>Paris (PAR)</b>	21 (14M / 7F)	275.0	15.9	7.4	15.0
 <b>Singapore (SIN)</b>	53 (34M / 19F)	965.0	21.5	12.3	18.2
 <b>Corporate Office</b>	132 (84M / 48F)	582.0	4.5	4.5	4.4
<b>TOTAL (Reported Sites)</b>	<b>324 (229M / 95F)</b>	<b>4,794.0</b>	<b>17.0</b>	<b>9.6</b>	<b>14.8</b>

**HEALTH AND SAFETY & WELLBEING**

(S1-SBM-3, S1-13; GRI 2-25 to 2-26, 3-3, 403; SASB IF-RE-320a.1, IF-RE-450a.1)

**Occupational Health and Safety Management framework**

Global Switch operates an ISO 45001-certified Occupational Health and Safety (OHS) Management Systems across all data operations, covering 100% of its employees working at operational sites. The OHS Management System is designed to prevent work-related injuries and ill health, ensure legal compliance, and promote a proactive health and safety culture across all operations and is supported by site-specific procedures, risk assessment and internal controls. The corporate office is working towards full alignment with the Group OHS framework.

The Group applies systematic processes to identify hazards, assess risks and implement appropriate control measure. These processes include:

- Formal risk assessments, Permit-to-Work systems, and method statements;
- Site-specific walkthroughs, toolbox talks, safety briefings and H&S reviews;
- Use of external experts for risk assessments and mitigation planning in selected locations (e.g., Singapore and Madrid);
- Weekly reviews of incidents, near misses and hazard using integrated H&S tracking systems;
- Annual management reviews.

Occupational health services are provided to support the prevention, identification and management of work-related health risks. Services include access to medical support where required, health surveillance for identified risks, and referral pathways in line with local regulatory requirements. Occupational health arrangements are proportionate to the nature of activities and site-specific risk profiles.

Employees are actively involved in health and safety through regular site meetings, toolbox talks, safety briefings and formal communication channels. Workers are encouraged to report hazards, near misses and incidents without fear of reprisal. Health and safety performance, incidents and lessons learned are communicated regularly across sites to promote continual improvements.

All employees and on-site contractors receive health and safety training appropriate to their role and site activities. Training includes general health and safety induction, emergency response procedures, and task-specific or risk-specific training where required. Refresher training and toolbox talks are conducted regularly.



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## Wellbeing and Mental Health

Global Switch recognises that supporting the physical and mental wellbeing of its workforce is essential to building a resilient and high performing organisation. The Group promotes worker health through a combination of preventative wellbeing initiatives, access to external healthier services, and mental health support programmes. The Group reviews participation trends and feedback to continuously improve its wellbeing offering and ensure support remains aligned with workforce needs. Health promotion activities are designed to complement the Group's occupational health and safety framework and are accessible to all employees across operating regions.

All employees have access to non-occupational medical and wellbeing support through externally provided services, including the MYNDUP digital mental health and wellbeing platform. This platform offers confidential access to professional counselling, therapy, life coaching and executive coaching services. Support is delivered by qualified practitioners and is available independently of management involvement to ensure confidentiality.

Wellbeing initiatives also include:

Mental health awareness campaigns;

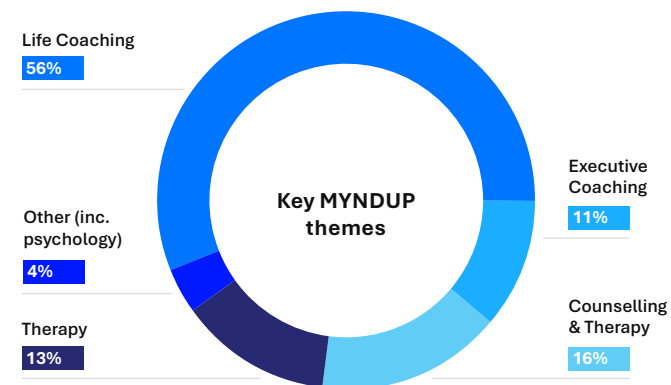
Workshops focused on resilience, stress management and work-life balance;

Communication promoting available support resources;

Flexible working practices where operationally feasible.

## Spotlight on our Mental and Financial Wellbeing coaching platform partner - MYNDUP

In 2025, the Group expanded its use of the MYNDUP platform by arranging additional workshops and awareness sessions and actively promoting the resource across all locations. Participation included employees across age groups and seniority levels, with engagement from both management and team members. An insight into key themes and participation on the MYNDUP platform is provided below:



199  
Sessions

188.5  
Hours

43%  
Aged 35-44 years

57%  
Aged 45+ years

63%  
Male

38%  
Female

### Health and Safety coverage and contractor management

Health and safety risks arising from contractors and other third parties are managed through contractor pre-qualification, site induction processes and ongoing supervision. On-site works are subject to strict control measures, including isolation procedures, confined space requirements and risk-specific training. Contractors are required to comply with Global Switch’s health and safety standards while working on site.

Contractors and third-party workers operating on site are managed under the same health and safety framework where Global Switch has operational control.

### Work-related injuries and ill health

In 2025, there were no fatalities or work-related accidents resulting in lost time among Global Switch’s own employees. One work-related injury involving a contractor was recorded and reported to the relevant regulatory authority (HSE); the incident occurred at the London site. Work-related injury data is monitored and reviewed as part of the Group’s health and safety performance management processes.

TYPE	NUMBER OF DAYS LOST
Work-related ill health	385
Work-related accidents	0
Fatalities (work related accidents or ill-health related)	0

The work-related ill health rate for the reporting year was 0.5%. There were 3 reported cases primarily related to stress-related conditions.

### WORK-LIFE BALANCE METRICS

#### Family leave entitlements and work-life balance support

Global Switch provides all employees with access to family-related leave, including maternity, paternity, adoption, parental, carers, bereavement, and neonatal leave. Entitlements comply with local legislation and are detailed in the Employee Handbook and accessible through the Group intranet, Switch.

As of 31 December 2025, **100% of employees** were eligible for family-related leave.

	FEMALE	MALE	TOTAL
Employees that took parental leave	4	8	12
Employees that returned to work in the reporting period after parental leave ended	3	8	11

At the reporting date one person had been on maternity leave.

#### ACCOUNTING PRINCIPLES

Days lost is defined as the number of days lost to employee absence related to injuries and fatalities across all Global Switch sites, counted on a calendar-day basis, i.e., weekends and public holidays are counted as lost days, and where the first full day and last day of absence are included.

Days lost on account of ‘work-related ill-health’ are excluded from this metric.

Data includes all full-time employees. Contractor data reflects workers at sites where Global Switch exercises operational control and no other contractor or subcontractor workers.

Recordable injuries follow the GRI 403-9 definition (i.e. work-related injuries requiring medical treatment beyond first aid).

Hours worked are standardised at 2,000 hours per FTE per year, assuming 40 hours/week × 50 weeks.

Injury rates are calculated per 200,000 hours worked as per ESRS and GRI standards.

The work-related ill health rate is calculated as total hours worked (648,000 hours)/total number of employees (324).

Data is sourced from site-level monthly reports and verified through the ISO 45001 system.

Leave eligibility is based on national legislation and standard contract terms.



## WORKERS IN THE VALUE CHAIN

Board-level responsibility	Managerial responsibility
COO	Group Operations Director (Procurement, Health and Safety), Executive Delivery Director, Legal Counsel (supplier contracts), Head of Information Security

Global Switch recognises that safeguarding the rights, wellbeing, and safety of workers across our value chain is essential to responsible and sustainable business operations. In 2025, we continued to strengthen our due diligence processes to identify, prevent, and mitigate risks related to excessive working hours, child and forced labour, health and safety, and data privacy. Through enhanced supplier engagement and clearer expectations on ethical conduct, we aim to promote fair working conditions and uphold human rights throughout our extended value chain.

### WORKERS IN THE VALUE CHAIN- IROs, POLICIES, TARGETS, ACTIONS, ENGAGEMENT AND GOVERNANCE

(S2-SBM-3, S2-IRO-2, S2-1 to S2-4; GRI 2-23 to 2-24, 3-2, 3-3, 408-1, 409-1, 414-1)

Global Switch acknowledges that it may be linked to actual and potential negative impacts on value chain workers through the practices of suppliers and contractors operating upstream. Although these workers are not directly employed by Global Switch, we recognise that we can use our business relationships to require our supply chain partners to maintain robust governance systems that safeguard human rights and align with international standards. The business is in the process of evolving its approach through the development of a Responsible Supply Chain strategy, which will strengthen Global Switch's due diligence processes and inform future actions to manage upstream Risks and opportunities. Global Switch currently operates formal processes to engage directly with workers in its value chain through the channels for raising concerns, see **Stakeholder Engagement** section, and also through Health & Safety-related engagement at its data centre facilities and new developments construction sites.

At present, the Group's core approach focuses on the use of reputable suppliers and enforcement of expectations through its Supplier Code of Conduct (SCoC) as well as contractual agreements with construction contractors in relation to the developments of new data centres. As part of the evolution of its Information Security Management System, Global Switch has introduced supplier screening, using criteria for the robustness of the supplier information security management systems for the selection of new suppliers.

Global Switch's Supplier Code of Conduct (SCoC) sets out its expectations for all suppliers and contractors. These expectations were shaped through engagement with a broad range of stakeholders and covers key topics relevant to value chain workers, including:

- Prohibition of forced labour, child labour, and modern slavery
- Compliance with working time regulations
- Safe and healthy working environments
- Non-discrimination and equal opportunity
- Respect for workers' rights to organise and bargain collectively
- Fair employment terms and written contracts
- Protection of personal data and privacy rights

The SCoC aligns with internationally recognised instruments such as the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Core Conventions, and the UN Global Compact. The SCoC is provided to suppliers as part of our onboarding process and is being progressively integrated into contractual agreements. While implementation is ongoing, we are actively working to ensure that all suppliers will be bound by the SCoC as part of a standardised and consistent procurement process.



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**Table: Workers in the Value Chain – Material IROs**

IRO SUBTOPIC	MATERIAL IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN LOCATION	TIME HORIZON
<b>Working time for our supply chain workers</b>	Particularly where cost or delivery pressures on suppliers lead to extended shifts or limited rest time posing risks to worker health and wellbeing.	Potential Negative Impact	Upstream	2025 / 2026–2030 / 2031+
<b>Inadequate Health &amp; Safety for our supply chain workers</b>	Where suppliers lack robust health and safety management systems, Global Switch may be linked to unsafe working environments. This includes risks of accidents, exposure to hazardous materials, or poor safety training especially in construction or logistics.	Actual Negative Impact	Upstream	2025 / 2026–2030 / 2031+
<b>Child labour in our supply chain</b>	Inadequate due diligence or weak enforcement may expose Global Switch to child labour risks in parts of its supply chain. This includes scenarios where subcontractors operate in informal or high-Risk sourcing environments.	Potential Negative Impact	Upstream	2025 / 2026–2030 / 2031+
<b>Forced labour in our supply chain</b>	Global Switch may be linked to forced labour risks, particularly in contexts involving migrant or contract workers. These risks arise where suppliers rely on third-party recruiters, debt bondage, or lack clear labour oversight.	Potential Negative Impact	Upstream	2025 / 2026–2030 / 2031+
<b>Privacy for our value chain</b>	Global Switch may be indirectly linked to privacy violations in its value chain where suppliers mishandle personal worker data, exposing individuals to surveillance or exploitation.	Potential Negative Impact	Upstream	2025 / 2026–2030 / 2031+

**Consolidated Table:** Workers in the Value Chain - IROs, Policies, Actions, Targets and Governance

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<p><b>VALUE CHAIN WORKER-RELATED IMPACTS ON WORKING TIME, CHILD LABOUR AND FORCED LABOUR</b></p> <p><b>Resource Allocation</b> Group Procurement Director, Executive Delivery Director, Legal Counsel (supplier contracts)</p> <p><b>Internal Policy / Governance</b> SCoC</p> <p><b>External Framework / Standard</b> ILO Core Conventions</p> <p><b>Disclosure Ref.</b> S2-1, S2-3, S2-4</p>	<p>Our SCoC requires compliance with relevant regulations on working time and requires due diligence to ensure no child labour and no forced labour.</p>	<p>Ongoing</p>	<p>In place</p>	<p>Policy in place</p>
<p><b>PRIVACY</b></p> <p><b>Resource Allocation</b> Group Procurement Director, Executive Delivery Director, Legal Counsel (supplier contracts), Head of Information Security</p> <p><b>Internal Policy / Governance</b> SCoC</p> <p><b>External Framework / Standard</b> ISO27001</p> <p><b>Disclosure Ref.</b> S2-1, S2-3, S2-4</p>	<p>In 2026 we aim to embed the SCoC into new supplier contractual agreements.</p>	<p>From 2026 onwards</p>	<p>Planned</p>	<p>% of new supplier contracts where SCoC is embedded</p>
	<p>Privacy management systems screening criteria for new suppliers introduced in 2025.</p>	<p>Launched in 2025</p>	<p>In place</p>	<p>% of new suppliers screened using relevant criteria</p>
	<p>SCoC requires due diligence to prevent breaches to privacy in workforce/ supply chain and affected communities.</p>	<p>Ongoing</p>	<p>In place</p>	<p>Policy in place</p>
	<p>In 2026, we aim to embed the SCoC into new supplier contractual agreements.</p>	<p>From 2026 onwards</p>	<p>Planned</p>	<p>% of new supplier contracts where SCoC is embedded</p>

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**Consolidated Table:** Value chain workers - IROs, Policies, Actions, Targets and Governance

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<b>HEALTH &amp; SAFETY</b>  <b>Resource Allocation</b> Group Procurement Director, Executive Delivery Director, Legal Counsel (supplier contracts), Health & Safety Manager  <b>Internal Policy / Governance</b> Global Switch Health and Safety Policy, SCoC  <b>External Framework / Standard</b> ISO45001  <b>Disclosure Ref.</b> S2-1, S2-3, S2-4	We employ appropriate procurement policies to ensure that only competent contractors and suppliers are engaged by Global Switch.	Ongoing	In place	Policy in place
	SCoC requires Occupational H&S arrangements from contractors and compliance with relevant regulations.	Ongoing	In place	Policy in place
	Our H&S Management system targeting Zero Harm applies to value chain workers on our premises (as well as our own workforce).	Ongoing	In place	Lost time due to injury
	In 2026 we aim to embed the SCoC into new supplier contractual agreements.	From 2026 onwards	Planned	% of new supplier contracts where SCoC is embedded

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## AFFECTED COMMUNITIES

Board-level responsibility	Managerial responsibility
Group HR Director	Facility Managing Directors, Group Delivery Director, HR team

Global Switch recognises the importance of upholding the rights of and minimising the impacts on affected communities. Through active engagement with local communities, rigorous impact management, and a commitment to operating as a responsible neighbour, we aim to support resilient, safe, and thriving communities across our operations and value chains.

### AFFECTED COMMUNITIES - IROs, POLICIES, ENGAGEMENT, ACTIONS, TARGETS AND GOVERNANCE (S3-IRO-2, S3-SBM-3, S3-1 to S3-4; GRI 3-2, 3-3, 413)

Our DMA identified a few IROs to affect or potentially affect communities. The IROs that primary relates to climate change are listed in the **Environmental** chapter of this report and those relating to impacts and risks via the supply chain are listed in the **Governance** chapter, whereas IROs through our customers are listed in the **Customer, consumers and end users** section of this report.

In this section, cross-cutting IROs are listed relating to positive impacts to local communities generated by Global Switch operations and relating to potential negative impacts and business risks arising from concerns around data centres' increased resource use. Global Switch policies are designed for the thorough assessment and management of these IROs at every aspect of its operation and value chain. These policies include proactive engagement with local communities as well providing channels for raising concerns and access to remedy, for details see the **Stakeholder Engagement** section.

**Table:** Affected Communities – IROs

SUBTOPIC	MATERIAL IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN LOCATION	TIME HORIZON
<b>Positive impact and shared value opportunities for local communities</b>	Global Switch's operations contribute to the economy of local communities by generating employment, investment, tax revenues, business opportunities for local suppliers and through community development initiatives such as charitable giving and community volunteering, which strengthen the trust and bond with communities, creating more favourable conditions for operations.	Actual Positive Impact, Opportunity	Own Operations	2025 / 2026–2030 / 2031+
<b>Local community concerns about the use of resources</b>	High energy and water demand from Global Switch facilities could contribute to electricity grid strain, reduce access to water for local communities and impact the attractiveness of Global Switch's operations.	Potential Negative Impact, Risk	Own Operations	2025 / 2026–2030 / 2031+



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**Consolidated Table:** Affected Communities - IROs, Policies, Actions, Targets, Metrics/KPIs and Governance

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<p><b>POSITIVE IMPACT AND SHARED VALUE OPPORTUNITIES IN LOCAL COMMUNITIES</b></p> <p><b>Resource Allocation</b> Local operations teams, corporate office staff</p> <p><b>Internal Policy / Governance</b> -</p> <p><b>External Framework / Standard</b> -</p> <p><b>ESRS Disclosure Reference</b> S3-1, S3-3, S3-4</p>	<p>As a minimum, we have a target to deliver 2 engagement and fundraising events per data centre location per year to strengthen community impact and employee connection.</p> <p>In 2025, Global Switch employees organised 14 events globally, further strengthening its community engagement approach across regions, focusing on initiatives that promote social inclusion, education, wellbeing, and charitable giving. See <b>OUR COMMUNITY ENGAGEMENT ACTION</b> section.</p> <p>Increase employee participation in community engagement by encouraging all staff to use up to 2 volunteering days per year, in line with Global Switch’s employee volunteering guidelines.</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>In place</p> <p>301.5 hours of volunteering in 2025</p> <p>0.9 hours of volunteering per employee</p>	<p>Number of events organised</p> <p>Volunteering hours</p> <p>Average volunteering hours per employee</p>
<p><b>LOCAL COMMUNITY CONCERNS ABOUT THE USE OF RESOURCES</b></p> <p><b>Resource Allocation</b> Delivery team, Investment team, HR &amp; ESG teams’ contributions, specialist consultants</p> <p><b>Internal Policy / Governance</b> Process for the Delivery of Projects (PDP) Policy</p> <p><b>External Framework / Standard</b> Section 106 planning obligations under the Town and Country Planning Act, applied in line with the statutory tests in Regulation 122 of the Community Infrastructure Levy Regulations and national policy (NPPF) (England and Wales), local equivalent regulations in the rest of the world</p> <p><b>ESRS Disclosure Reference</b> S3-1, S3-2, S3-3</p>	<p>Where our developments may affect local communities, Global Switch follows the applicable planning obligation or developer contribution regimes in each jurisdiction and implements measures that are necessary, directly related, and proportionate to mitigate impacts. In England and Wales, this includes, where applicable, Section 106 planning obligations under the Town and Country Planning Act, applied in line with the statutory tests in Regulation 122 of the Community Infrastructure Levy Regulations and national policy (NPPF). In the rest of the UK, there are corresponding frameworks. In other countries where we operate, we comply with equivalent mechanisms – development and planning permission conditions. This ensures legal compliance and that our contributions and actions (e.g., transport improvements, skills and employment initiatives, affordable workspace, or other site specific measures) address real, localised impacts on affected communities. See also actions on energy and water efficiency and potable water use reductions in the Climate Change and in the Water sections.</p>	<p>Ongoing</p>	<p>In place</p>	<p>Process in place</p>

## OUR COMMUNITY ENGAGEMENT ACTION

### COMMUNITY RESILIENCE

In **Singapore**, Global Switch continued its sponsorship of **Woodlands Constituency events**, supporting underprivileged communities during national celebrations such as **Ramadan and Deepavali**. These efforts promote inclusion, community spirit and wellbeing.

Global Switch **Madrid** joined the annual Ponle Freno charity race, aimed at raising funds for victims of road traffic accidents and promoting road safety and solidarity. The team also proudly represented Global Switch in the annual **Carrera de las Empresas** where competing teams from companies across Spain run through the streets of Madrid, with the aim of promoting **health and wellbeing in the business environment**.

In **Hong Kong**, Global Switch was Gold sponsor for the Run for Survival 2025, held by the **Hong Kong Ocean Park Conservation Foundation (HKOPCF)**.

### EDUCATION, YOUTH ENGAGEMENT AND SKILLS DEVELOPMENT

Global Switch actively supports future skills development through a range of educational initiatives:



Singapore

In **Singapore**, we partnered with the Academy of Singapore (AST) to support the **Teacher's Work Attachment Programme**, hosting data centre talks and tours for educators.



Hong Kong

In **Hong Kong**, we continued our engagement with students during the **HKUST Sustainable Smart Campus Competition**, supporting student-led sustainability innovation with donations for the 2025 – 2026 academic year.



Amsterdam

In **Amsterdam**, we conducted 5 tours for students from the **University of Applied Sciences**, and hosted local **residents and business staff from the adjacent neighbourhood** for a guided data centre visit to promote transparency and local engagement.

Additionally, Global Switch **Amsterdam** established a partnership with the **NEMO Science Museum** to support its Outreach programme, helping children from deprived backgrounds access the museum and engage with STEM learning.

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## CHARITABLE GIVING AND SOCIAL INCLUSION

Global Switch teams across the network contributed time and resources to causes supporting health, wellbeing, and social care:



### LONDON

Global Switch London hosted a Big Brunch on **World Mental Health Day** in support of **Mind**. In December, the team raised funds for **Young Minds** with a Christmas Raffle. Members of the team participated in the 2025 Paris Marathon to raise funds for the **Chickenshed** charity.



### MADRID

Global Switch Madrid supported **Fundación Acrescere** (Spanish non-profit that supports vulnerable children and young people without family care through foster programmes, housing, education, and social inclusion initiatives) by donating Christmas gifts and running an ongoing donation campaign in partnership with customers and suppliers.



### LONDON

At the **London Victoria Corporate Office**, staff hosted **coffee morning fundraisers** in support of Macmillan, organised Christmas donation drives and foodbank collections. The team also supported colleagues that ran the London Marathon in support of **Chickenshed**.



### FRANKFURT

In **Frankfurt**, we joined forces with local contractors to raise funds and continued our support for **MainLichtBlick e.V.** as well as **Die Tafel** food services and the **Kinder & Jugendhospiz** youth hospice.

## EMPLOYEE ENGAGEMENT THROUGH VOLUNTEERING

Several volunteering initiatives fostered team spirit and community impact:



### AMSTERDAM

Colleagues in **Amsterdam** volunteered at a local homeless shelter, helping to strengthen community support networks and improve wellbeing for vulnerable residents.



### HONG KONG

In collaboration with **The Childhood Trust**, our colleagues at **London Victoria Corporate Office** volunteered and spent a day transforming the bedroom of 2 young children.

## COMMUNITY SPORT AND YOUTH DEVELOPMENT



Global Switch continues to proudly sponsor **Eintracht Frankfurt CSR projects**, supporting children's movement, social integration, and community engagement through sport. In addition, our Frankfurt team hosted guided tours for the "Adler Classics" (Eintracht fans).



## CUSTOMERS, CONSUMERS AND END-USERS

Board-level responsibility	Managerial responsibility
COO	Information Security and Technology Director, Group Operations Director

Safeguarding the privacy, security, and service continuity of our customers and their end users remains fundamental to Global Switch’s role as a trusted data centre partner. In 2025, we continued to strengthen our governance, technical controls, and incident response capabilities to mitigate risks related to data protection and service interruptions. Our commitment to resilience and responsible data stewardship supports our customers’ own sustainability objectives and reinforces confidence in our digital infrastructure.

### CUSTOMERS, CONSUMERS AND END-USERS - IROs, POLICIES, ENGAGEMENT, ACTIONS, TARGETS AND GOVERNANCE (S4-IRO-2, S4-SBM3, S4-1 to S4-4; GRI 3-2, 3-3, 416-1, 418-1; SASB TC-TL-230a.1, TC-TL-230a.2)

Global Switch provides mission-critical infrastructure services to cloud providers, enterprises, and connectivity platforms. Although the Group’s direct contractual relationships are with corporate customers, its facilities enable services that ultimately affect consumers and end-users, including vulnerable populations who rely on health, emergency, financial, or public digital services. Global Switch manages downstream risks to consumers and end-users by applying robust governance frameworks across information security, risk management, and continuity of service.

Engagement with consumers or the general public does not occur directly, given our B2B business model. However, Global Switch continues to engage actively with customers, particularly those operating in sensitive sectors. Engagement includes providing its customers and the general public channels for raising concerns. These engagements indirectly surface end-user expectations and shape operational practices. See the **Stakeholder Engagement** section for details.

**Table:** Customers, consumers and end users - IROs

IRO SUBTOPIC	MATERIAL IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN LOCATION	TIME HORIZON
<b>Privacy of our customers and end users</b>	Risk of a data privacy breach through Global Switch-hosted customer infrastructure, potentially exposing the personal information of digital end users and triggering legal liabilities and reputational loss for the business.	Potential Negative Impact, Risk	Own Operations	2025 / 2026–2030 / 2031+
<b>Access to information and personal safety of consumers and/or end users</b>	Global Switch services customers that provide access to information, personal safety- critical services to end-users, such as health and safety, security and child protection, and failure of service provision could potentially result in putting end-users at risk as well as in serious operational and reputational consequences for the business.	Potential Negative Impact, Risk	Own Operations	2025 / 2026–2030 / 2031+



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**Consolidated Table:** Customers, consumers and end-users - IROs, Policies, Actions, Targets, Metrics/KPIs and Governance

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<p><b>CUSTOMER AND END-USER PRIVACY</b></p> <p><b>Resource Allocation</b> Information Security team</p> <p><b>Internal Policy / Governance</b> Information Security Policy, Data Privacy Policy, DPIA Policy, ISO 27001-certified Information Security Management System</p> <p><b>External Framework / Standard</b> ISO27001/ General Data Protection Regulation (GDPR) / UN Guiding Principles on Business and Human Rights (UNGPs)/ OECD Guidelines for Multinational Enterprises</p> <p><b>ESRS Disclosure reference</b> S4-1, S4-3, S4-4</p>	<p>Global Switch uses an Information Security Management System (ISMS) third-party certified to ISO 27001 across all its operations to ensure robust handling of all data.</p> <p>Our 2025 improvement target on privacy was to extend the ISMS to corporate office operations.</p>	<p>Ongoing</p> <p>Planned for 2025</p>	<p>In place</p> <p>No recorded substantiated privacy breaches of customer privacy or losses of customer data in 2025.</p> <p>ISO27001 certification was successfully extended to the corporate office operations.</p>	<p>ISO27001 certification in place.</p> <p>Number of customer privacy breaches or data losses</p> <p>ISO27001 certification for corporate office operations</p>
<p><b>ACCESS TO INFORMATION AND PERSONAL SAFETY OF CONSUMERS AND/OR END USERS</b></p> <p><b>Resource Allocation</b> Operations teams A new incident reporting system, Pager Duty, was introduced in 2025 to support standardised and automated reporting</p> <p><b>Internal Policy / Governance</b> Risk Management Policy, Business Continuity strategy, Group DCOS (Data Centre Operations Support) Procedures, Incident Escalation Procedure, SLA frameworks</p> <p><b>External Framework / Standard</b> ISO9001 Quality Management System, ISO45001 Health &amp; Safety Management Systems</p> <p><b>ESRS Disclosure reference</b> S4-1, S4-3</p>	<p>Global Switch operates systems designed to ensure uninterrupted service and safe, secure environments. These consist of the Group Data Centre Operations Support, which mandates redundancy in power and cooling systems, site-specific Business Continuity Plans, 24/7 infrastructure monitoring, health &amp; safety and security, and defined emergency escalation protocols. Where incidents or near misses occur, root-cause reviews are conducted, and lessons learned are incorporated into operations.</p>	<p>Ongoing</p>	<p>In place</p> <p>In 2025, Global Switch achieved uninterrupted service across all campuses with no incidents impacting end-users.</p> <p>No health &amp; safety incidents involving customers.</p>	<p>Business continuity processes in place, Uptime metrics, health and safety metrics</p>

# GOVERNANCE

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## BUSINESS CONDUCT

### Board-level responsibility

COO

### Managerial responsibility

Chief Legal Officer (Anti-corruption, Whistleblowing, Suppliers), Group HR Director (Corporate Culture), COO (Political Influence and Lobbying)

Responsible business conduct forms the foundation of Global Switch’s long-term resilience and the trust placed in us by customers, investors, suppliers, and stakeholders. In 2025, we continued to strengthen our governance frameworks- promoting a culture of integrity, protecting whistleblowers, enhancing supplier oversight on ESG and reinforcing robust anti-corruption and bribery controls. Through transparent reporting and active engagement in responsible industry associations, we aim to ensure that our operations and value chain uphold the highest ethical standards.

### BUSINESS CONDUCT - IROs, POLICIES, ENGAGEMENT, ACTIONS, TARGETS AND GOVERNANCE

(G1-IRO-2, G1-SBM-3, G1-1 to G1-3; GRI 2-23 to 2-26, 2-28, 3-2, 3-3, 204, 205, 206, 308, 414, 415; SASB TC-TL-520a.1)

Global Switch’s business conduct-related material IROs were identified through our **Double Materiality Assessment**. Their classification and time horizon were determined using the same criteria as for environmental and social matters. Business conduct emerged as a key cross-cutting priority, influencing both trust and resilience across the value chain with a focus on corporate culture, ethical conduct, supply-chain practices, and compliance with anti-bribery and transparency standards. Global Switch maintains a Code of Conduct, Whistleblowing Policy, and Anti-Bribery and Corruption Policy, all reviewed regularly to ensure alignment with international expectations. Implementation is supported by Global Switch’s core governance structures including our Sustainability Due Diligence Framework, which embeds responsible business conduct across operations and the supply chain, as described in the relevant section on **ESG Governance**.

Global Switch recognises that fostering a strong, transparent, and ethical culture is fundamental to long-term resilience, regulatory compliance, and stakeholder trust. Any concerns can be raised using our internal and external channels as outlined in the **Stakeholder Engagement** section. We have taken deliberate steps to formalise business conduct expectations, embed them in daily operations, and create the conditions for ethical behaviour and accountability at all levels.

**Table:** Business Conduct - IROs

IRO SUBTOPIC	MATERIAL IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN LOCATION	TIME HORIZON
<b>Corporate culture</b>	Fostering a strong corporate culture across Global Switch’s operations promotes ethical conduct, inclusivity, and accountability, strengthening trust with internal teams, customers, and broader society.	Actual Positive Impact, Opportunity	Upstream / Own Operations	2025 / 2026–2030 / 2031+
<b>Protection of whistleblowers</b>	Failure to protect whistleblowers across Global Switch’s operations or value chain could discourage transparency and accountability, increasing the Risk of unethical practices and potential non-compliance with legal requirements.	Potential Negative Impact	Upstream / Own Operations	2025 / 2026–2030 / 2031+
<b>Management of relationships with suppliers on ESG matters (as impact)</b>	Weak oversight of supplier relationships across Global Switch’s value chain can increase the risk of ESG violations (e.g., labour, environment), especially in lower-tier suppliers.	Potential Negative Impact	Upstream	2025 / 2026–2030 / 2031+
<b>Management of payment practices regarding suppliers</b>	Failure to ensure fair and timely payments to suppliers could disproportionately affect small or vulnerable vendors, reducing social equity and trust in the supply chain.	Potential Negative Impact	Upstream	2025 / 2026–2030 / 2031+
<b>ESG reporting</b>	By reporting transparently to platforms that support climate and ESG performance, Global Switch enables customers and suppliers to track and improve their own sustainability progress.	Actual Positive Impact	Own Operations	2025 / 2026–2030 / 2031+
<b>Memberships / participation in associations</b>	Global Switch’s participation in industry bodies supports ethical collaboration, promotes ESG knowledge-sharing, and contributes to collective progress on shared sustainability issues. Employees who represent the business also benefit personally by gaining new insights and professional development opportunities.	Actual Positive Impact	Own Operations	2025 / 2026–2030 / 2031+
<b>Protection of whistleblowers</b>	Lack of effective whistleblower protection mechanisms internally or in the value chain may expose the business to risks of undisclosed misconduct, delayed issue resolution, and reputational harm, which could reduce investor confidence and affect continuity.	Risk	Upstream / Own Ops / Downstream	2025 / 2026–2030 / 2031+
<b>Management of relationships with suppliers on ESG matters (as risk)</b>	Potential risk from suppliers failing to meet ESG requirements, including failures in legal compliance such as sanctions breaches or inadequate safety standards, which could create reputational, regulatory, or operational issues.	Risk	Upstream / Own Ops	2025 / 2026–2030 / 2031+
<b>Anti-corruption and bribery</b>	Engaging in corrupt practices or failing to conduct adequate due diligence on customers and suppliers (e.g., sanctions checks) can lead to legal actions, regulatory penalties, reputational damage, and loss of business opportunities.	Risk	Upstream / Own Ops / Downstream	2025 / 2026–2030 / 2031+

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**Consolidated Table: Business conduct - IROs, Policies, Actions, Targets, Metrics/KPIs and Governance**

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<p><b>CORPORATE CULTURE</b></p> <p><b>Resource Allocation</b> Chief Legal Officer, Group HR Director</p> <p><b>Internal Policy / Governance</b> Business Code of Conduct; Anti-Bribery and Corruption Policy, Employee handbook</p> <p><b>External Framework / Standard</b> UK Bribery Act, OECD Guidelines, and the UN Global Compact principles</p> <p><b>Disclosure Ref.</b> G1-1, G1-2, G1-3, GRI-206</p>	<p>The Group-wide <b>Code of Conduct</b>, approved by the Board of Directors and updated in 2025, establishes Global Switch’s overarching policies on integrity, legal compliance, respect for human rights. These include:</p> <ul style="list-style-type: none"> <li>– Integrity in business dealings</li> <li>– Prohibition of corruption, bribery, and fraud</li> <li>– Respect for human rights and labour protections</li> <li>– Confidentiality and data protection</li> <li>– Avoidance of conflicts of interest</li> <li>– Fair competition and ethical dealing</li> </ul> <p>The Code applies to all employees, officers, directors, consultants, suppliers, agents and business partners working on behalf of Global Switch and is available via the Group intranet in all operating regions.</p> <p>Global Switch embeds ethical conduct through both formal systems and culture-building mechanisms:</p> <p><b>Onboarding and mandatory training:</b> All new hires are trained on:</p> <ul style="list-style-type: none"> <li>– Code of Conduct</li> <li>– Anti-Harassment Policy</li> <li>– Equal Opportunities Policy</li> <li>– Whistleblowing Policy</li> <li>– Anti-Bribery and Corruption Policy</li> <li>– Capability Policy</li> <li>– Gifts and Hospitality Policy</li> <li>– Grievance Policy</li> <li>– Data Protection</li> <li>– Information Security</li> <li>– Physical Security SOPs</li> </ul> <p><b>Business training platforms:</b> Used to roll out training, test employee understanding and track policy dissemination.</p> <p><b>Leadership communication:</b> Board members and Executives regularly reinforce values-based decision-making and set the tone for ethical leadership.</p> <p><b>Employee engagement:</b> Values and conduct expectations are communicated via the intranet (Switch), workshops, employee handbook, all-staff briefings as well as a new podcast launched in 2025.</p>	<p>Ongoing</p>	<p>In place</p>	<p>Global Switch did not identify any breaches of its Code of Conduct in 2025</p>

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IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<p><b>PROTECTION OF WHISTLEBLOWERS</b> (as potential impact and as risk)</p> <p><b>Resource Allocation</b> Group HR Director and Chief Legal Officer</p> <p><b>Internal Policy / Governance</b> Whistleblowing Policy; Supplier Code of Conduct (SCoC)</p> <p><b>External Framework / Standard</b> General Data Protection Regulation, EU Whistleblower Protection Directive</p> <p><b>Disclosure Ref.</b> G1-1, G1-2, G1-3</p>	<p>Our whistleblowing mechanism is available 24/7 in all languages and has non-retaliation provisions.</p>	<p>Ongoing</p>	<p>In place</p>	<p>Processes in place</p>
	<p>In early 2026 our whistleblowing channel has been strengthened through the introduction of independent 3rd party whistleblowing hotline, see also section <b>Stakeholder Engagement</b>.</p>	<p>2026</p>	<p>In place</p>	
<p><b>MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS INCLUDING ON ESG MATTERS</b> (as potential impact and risk)</p> <p><b>Resource Allocation</b> Group Procurement Director, Legal team, Local operations teams, ESG Team</p> <p><b>Internal Policy / Governance</b> SCoC, contract ESG requirements (e.g. BREEAM / LEED), Sustainability Due Diligence (SDD)</p> <p><b>External Framework / Standard</b> UN Guiding Principles on Business and Human Rights, ILO Core Conventions, and the OECD Guidelines for Multinational Enterprises, Corporate Sustainability Due Diligence Directive (CSDDD), UK Modern Slavery Act</p> <p><b>Disclosure Ref.</b> G1-1, G1-2, G1-3, GRI 204-1, GRI-308, GRI-414</p>	<p>Global Switch’s supplier relationships are governed by a structured procurement approach that emphasises ethical conduct, contractual clarity, and ESG performance expectations. The Group works with a diverse network of suppliers spanning construction, engineering, facilities management, OEMs, and professional services. These partners are critical to the delivery of resilient and secure data centre operations across the Group’s global portfolio. All suppliers are expected to comply with the Group’s Supplier Code of Conduct (SCoC), which sets standards for:</p> <ul style="list-style-type: none"> <li>– Human rights and labour conditions</li> <li>– Occupational health and safety</li> <li>– Environmental stewardship and climate mitigation</li> <li>– Ethical conduct and anti-corruption</li> <li>– Data privacy and protection</li> </ul> <p><b>Local supplier engagement</b> Global Switch engages suppliers across multiple jurisdictions to support the development and operation of its data centre infrastructure. Where feasible and appropriate, the Group seeks to engage local suppliers to support regional economies and operational resilience.</p> <p>The Group continues to assess opportunities to enhance data availability and reporting on local supplier spend over time.</p>	<p>In progress - planned for 2026</p>	<p>Partially implemented; contractual clauses in place; further integration into procurement workflow ongoing.</p>	<p>Processes in place</p>
	<p><b>Supplier screening on ESG</b> Supplier screening is being expanded in line with Responsible Supply Chain strategy development planned for 2026.</p>	<p>In progress - planned for 2026</p>		
	<p>Strengthened procurement process with supplier screening using environmental and social criteria and contractual obligations.</p>	<p>In progress - planned for 2026</p>		

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IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<p><b>MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS ON PAYMENT PRACTICES</b></p> <p><b>Resource Allocation</b> Finance team</p> <p><b>Internal Policy / Governance</b> Purchase Order, Receipting and Invoicing Policy, SCoC</p> <p><b>External Framework / Standard</b> N/A</p> <p><b>Disclosure Ref.</b> G1-1, G1-2, G1-3, G1-6, GRI-204</p>	<p>GlobalSwitch is committed to responsible supplier management and fair payment practices. The Group applies standardised procurement, invoicing and payment processes across its operations to support transparency, consistency and timely payment of suppliers. Supplier onboarding, contracting and payment activities are governed by the Group’s Purchase Order, Receipting and Invoicing Policy. The policy defines requirements for supplier onboarding, purchase order (PO) generation, invoicing, and payment processing.</p> <p>Payment terms are contractually agreed with suppliers during onboarding and contract negotiation. Due to the global nature of the business and the diversity of goods and services procured, payment practices may vary by supplier and jurisdiction, in line with contractual and statutory requirements.</p> <p><b>Standard payment terms and processes</b></p> <p>Standard supplier payment terms are embedded within contractual agreements and communicated to suppliers at the outset of the relationship. These terms are reinforced through:</p> <ul style="list-style-type: none"> <li>– Inclusion in contract and PO documentation</li> <li>– Supplier onboarding processes</li> <li>– Verification of supplier details and bank information</li> <li>– Structured invoice approval and receipting workflows, using a three-way matching (PO, receipt and invoice)</li> </ul> <p>The Accounts Payable process includes payment runs at least twice monthly, dual-level approval and prioritisation protocols for urgent or exceptional payments. Suppliers are required to quote PO numbers on all invoices to support timely processing.</p> <p><b>Systems and controls</b></p> <p>Payments are processed through the payments platform system. Key controls include:</p> <ul style="list-style-type: none"> <li>– Segregation of duties between PO requestors, receivers, and payment approvers</li> <li>– Enforcement of the Delegation of Authority (DoA) matrix</li> <li>– Monthly vendor reconciliation when provided</li> <li>– Regular training of business users and finance staff on PO and invoicing standards</li> </ul> <p>A comprehensive audit trail is maintained through system records and supporting documentation to ensure traceability and compliance. Finance reviews payment performance periodically to identify improvement opportunities, including increasing the proportion of invoices paid in line with standard terms through earlier purchase order issuance and improved adherence to receipting protocols.</p>	Ongoing	In place	See <b>METRICS RELATED TO PAYMENT PRACTICES</b> below

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IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<p><b>REPORTING</b></p> <p><b>Resource Allocation</b> COO, ESG Steering Group, ESG Team</p> <p><b>Internal Policy / Governance</b> ESG Target commitment for annual reporting</p> <p><b>External Framework / Standard</b> CSRD - ESRS, GRI, CDP, EcoVadis</p> <p><b>Disclosure Ref.</b> G1-1, G1-2, G1-3</p>	<p>Annual ESG Report mapped to ESRS and GRI, CDP, EcoVadis participation, and continuous efforts to strengthen data collection.</p>	<p>Ongoing</p>	<p>In place</p>	<p>N/A</p>
<p><b>MEMBERSHIPS / ASSOCIATIONS</b></p> <p><b>Resource Allocation</b> COO, Operations team</p> <p><b>Internal Policy / Governance</b> N/A</p> <p><b>External Framework / Standard</b> N/A</p> <p><b>Disclosure Ref.</b> G1-1, G1-2, G1-3, GRI-415, GRI 2-28</p>	<p>Global Switch is a member of data centre industry associations and industry ESG bodies such as the Climate Neutral Data Centre Pact and TechUK, see also our Memberships section.</p> <p><b>Political Influence and Lobbying</b></p> <p>Global Switch maintains a position of political neutrality and does not engage in direct political contributions, political lobbying activities, or financing of political parties, candidates or political campaigns. The Global Switch's Code of Conduct prohibits the use of Group funds or assets for political purposes and sets clear expectations for employee conduct regarding political neutrality.</p> <p>However, Global Switch recognises the importance of transparent engagement in areas of evolving regulation, including climate policy, cybersecurity, and human rights legislation. Where relevant, the Group participates in industry-level dialogue through recognised sectoral organisations (such as trade associations and environmental certification platforms). Also on occasion we engage in lobbying activity with local government with technical issues regarding our facilities such as, power approval discussions in Madrid in 2025. These engagements are strictly technical or compliance-focused and are not considered political lobbying under applicable legal definitions.</p> <p>As part of our 2026 strategy, we aim to develop a lobbying framework policy.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>2026</p>	<p>In place</p> <p>In place</p> <p>In place</p> <p>Planned</p>	<p>See <b>METRICS RELATED TO POLITICAL INFLUENCE AND LOBBYING ACTIVITIES</b> below</p> <p>See <b>METRICS RELATED TO POLITICAL INFLUENCE AND LOBBYING ACTIVITIES</b> below</p> <p>Number of business leaders participating in industry membership organisations.</p>

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IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<p><b>ANTI-CORRUPTION AND BRIBERY</b></p> <p><b>Resource Allocation</b> Legal Team, training platforms, ESG Team</p> <p><b>Internal Policy / Governance</b> Anti-Bribery &amp; Corruption Policy</p> <p><b>External Framework / Standard</b> UK Bribery Act, OECD Guidelines, and the UN Global Compact principles</p> <p><b>Disclosure Ref.</b> G1-1, G1-2, G1-3, G1-4, GRI -205</p>	<p>GlobalSwitch maintains a zero-tolerance approach to bribery and corruption. Risks associated with bribery and corruption are managed through a combination of governance oversight and operational controls embedded across the business.</p> <p><b>Global Switch’s procedures to prevent, detect, investigate and respond to allegations or incidents related to corruption or bribery</b></p> <p>Clear accountability structures are in place, supported by defined approval thresholds, segregation of duties, and documented decision-making processes across procurement, contracting and payment activities in line with the Group’s Delegation of Authority framework.</p> <p>The Group applies risk-based internal controls designed to prevent, detect and respond to corruption risks. These controls include:</p> <ul style="list-style-type: none"> <li>– Controlled onboarding and due diligence of suppliers and advisors;</li> <li>– Contract approval workflows aligned to delegated authority limits;</li> <li>– Financial controls and transaction monitoring;</li> <li>– Enhanced scrutiny for higher-risk transactions and jurisdictions.</li> </ul>	Ongoing	In place	
	<p>The Group’s Anti-Bribery and Corruption Policy outlines the expectations for employees, Directors, and suppliers in relation to ethical behaviour, gift-giving, hospitality, conflict of interest, and third-party engagement. Global Switch prohibits all forms of bribery, corruption, facilitation payments, and abuse of entrusted power, whether direct or indirect, through its operations or supply chain. This policy is published on the Group’s training platforms, embedded in the onboarding process for all employees, and is accessible via the Group intranet (Switch). It is also disclosed to suppliers through tender documentation and supplier onboarding materials, including via the Supplier Code of Conduct.</p>	Ongoing	In place	
	<p><b>Anti-bribery concerns or incidents</b> Serious concerns or potential breaches may be escalated through line management, the Legal team, or via the Group’s dedicated <b>whistleblowing channel</b> – see also the <b>Stakeholder Engagement</b> section for more details.</p>			See <b>METRICS RELATED TO CORRUPTION OR BRIBERY</b> below
	<p><b>Training to prevent and detect bribery and corruption</b> Anti-corruption awareness is reinforced through mandatory training:</p> <ul style="list-style-type: none"> <li>– Training is required at onboarding and refreshed annually</li> <li>– Content covers bribery definitions, red flags, third-party risks, and escalation routes</li> </ul> <p>This training is standardised across all functions and geographies.</p>		97% of employees and Directors completed MetaCompliance anti-bribery training in 2025.	

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IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI
<b>ANTI-CORRUPTION AND BRIBERY</b> continued...	<p>Based on the nature of their responsibilities, functions most exposed to corruption or bribery risks include procurement and vendor selection, financial approvals, commercial negotiations, and interactions with public authorities or regulators. These exposures align with the key operational risk areas identified in our Anti-Bribery and Corruption Policy-such as construction and delivery tenders, large plant and equipment sourcing, competitive tendering and plot acquisitions, government licensing and permitting, and financial processes involving transfer of fund authority. Global Switch applies a universal training requirement to ensure full coverage, which includes functions most exposed to relevant risks, such as Procurement, Legal, and Sales.</p>			
	<p>To strengthen oversight, Global Switch will enhance its internal monitoring system in 2026 to complement existing Delegation of Authority controls, approval workflows, mandatory training and escalation procedures.</p> <p>In 2026, Global Switch will implement the below enhancements:</p> <ul style="list-style-type: none"> <li>- Review the policy content and update it for evolving global standards</li> <li>- Develop formal investigation protocols, including role separation</li> <li>- Evaluate whether function-specific or regional training enhancements are needed</li> <li>- Maintain regular refresher training and 100% staff completion on the Anti-Bribery and Corruption Policy.</li> <li>- Train relevant staff on bribery and corruption risk assessment system</li> <li>- Enhance due diligence of third-party partners</li> </ul>	2026	Planned	

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**METRICS RELATED TO CORRUPTION OR BRIBERY**

(G1-4; GRI 205-3; SASB TC-TL-520a.1)

METRIC	2025
Number of convictions for violations of anti-corruption or anti-bribery laws	0
Total fines imposed for violations	0
Confirmed incidents of corruption or bribery	0
Number of incidents involving own workers (dismissals, disciplinary action)	0
Contracts with business partners terminated or not renewed due to corruption	0
Public legal cases brought against Global Switch or its workers	0

**METRICS RELATED TO POLITICAL INFLUENCE AND LOBBYING ACTIVITIES**

(G1-5; GRI 415-1, 2-28)

METRIC	2025
Financial contributions made to political parties, candidates, or electoral campaigns in any jurisdiction	0
Corporate memberships held in politically affiliated organisations or think tanks	0
Lobbying activities or related expenditures	0

**METRICS RELATED TO PAYMENT PRACTICES**

(G1-6; GRI 204-1)

METRIC	2025	2024
Average number of days to pay invoices from contractual / statutory term start	37 days	33 days
Percentage of payments aligned with standard terms	61%	54%
Number of outstanding legal proceedings for late payments	0	0

Variations from agreed payment terms may arise due to delays in invoice receipting, incomplete documentation, mismatches between purchase orders and invoices, or operational processing issues.

**§ ACCOUNTING PRINCIPLES**

The average number of days to pay invoices is calculated as the mean number of calendar days between the contractual or statutory due date and the actual payment date. All figures reflect actual accounts payable data extracted from the Group's enterprise systems and reviewed by Finance.

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GRI DISCLOSURE REQUIREMENT	DISCLOSURE LOCATION
<b>GRI 2: General disclosures</b>	
2-1 Organisational details	Basis for Preparation of this Report
2-2 Entities included in the organisation's sustainability reporting	Basis for Preparation of this Report
2-3 Reporting period, frequency and contact point	Basis for Preparation of this Report
2-4 Restatements of information	Basis for Preparation of this Report
2-5 External assurance	Basis for Preparation of this Report
2-6 Activities, value chain and other business relationships	Global Switch at a Glance; Strategy, Business Model & Value Chain
2-7 Employees	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Characteristics of employees and non-employees
2-8 Workers who are not employees	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Characteristics of employees and non-employees
2-9 Governance structure and composition	ESG Governance
2-10 Nomination and selection of the highest governance body	ESG Governance
2-11 Chair of the highest governance body	ESG Governance
2-12 Role of the highest governance body in overseeing the management of impacts	ESG Governance
2-13 Delegation of responsibility for managing impacts	ESG Governance
2-14 Role of the highest governance body in sustainability reporting	ESG Governance
2-15 Conflicts of interest	Certain reserved matters which are considered by the Board, including but not limited to the entering into or amendment of a contract or transaction with any of the Group's shareholders or their respective affiliates or shareholders or with any Director (or any person connected with that Director) must be passed by a special majority of at least two thirds of the Directors, comprising within such two thirds: (A) either of the CEO or the CFO; and (B) the Independent Director, provided that where both the CEO and CFO are interested in the matter, neither the CEO nor the CFO shall be included within such two thirds
2-16 Communication of critical concerns	Channels to raise concerns and access to remedy
2-17 Collective knowledge of the highest governance body	ESG Governance

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GRI DISCLOSURE REQUIREMENT	DISCLOSURE LOCATION
2-18 Evaluation of the performance of the highest governance body	ESG Governance
2-19 Remuneration policies	ESG Governance
2-20 Process to determine remuneration	ESG Governance
2-21 Annual total compensation ratio	N/A - Not deemed material in current assessment
2-22 Statement on sustainable development strategy	Letter from the CEO and the COO
2-23 Policy commitments	ESG Strategy; Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance; Workers in the value chain- IROs, Policies, Targets, Actions, Engagement and Governance; Strategy, Business Model & Value Chain; Sustainability Due Diligence; Policy Overview
2-24 Embedding policy commitments	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance; Workers in the value chain- IROs, Policies, Targets, Actions, Engagement and Governance; ESG Strategy; ESG Governance.
2-25 Processes to remediate negative impacts	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance; Health and Safety & Wellbeing; Sustainability Due Diligence; Channels to raise concerns and access to remedy
2-26 Mechanisms for seeking advice and raising concerns	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance; Health and Safety & Wellbeing; Sustainability Due Diligence; Channels to raise concerns and access to remedy
2-27 Compliance with laws and regulations	Channels to raise concerns and access to remedy
2-28 Membership associations	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance; Memberships and Voluntary Commitments
2-29 Approach to stakeholder engagement	Stakeholder Engagement
2-30 Collective bargaining agreements	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance
<b>GRI 3: Material topics</b>	
3-1 Process to determine material topics	Double Materiality Assessment
3-2 List of material topics	List of material impacts, risks and opportunities
3-3 Management of material topics	ESG Strategy

## GRI INDEX

GRI DISCLOSURE REQUIREMENT	DISCLOSURE LOCATION
<b>GRI 201: Economic performance</b>	
201-1 Direct economic value generated and distributed	<p><b>Metric Amount (currency) £'m</b></p> <p><b>Direct economic value generated</b></p> <p>Revenues 466.2</p> <p>Other income 0</p> <p><b>Economic value distributed</b></p> <p>Operating costs (211.6)</p> <p>Employee wages and benefits (47.9)</p> <p>Payments to providers of capital (35.7)</p> <p>Payments to government (19.1)</p> <p>Community investments 0</p> <p><b>Economic value retained 151.9</b></p>
201-2 Financial implications and other risks and opportunities due to climate change	Climate change IROs Transition Plan, Policies, Actions and Targets
201-3 Defined benefit plan obligations and other retirement plans	The Group offers statutory pension schemes to all employees globally.
201-4 Financial assistance received from government	No amounts are received from the government except for rebates the data centres receive in certain jurisdictions based on the energy efficiency they achieve
<b>GRI 202: Market presence</b>	
3-3 Management of material topics	N/A - Not deemed material in current assessment
202-1 Ratios of standard entry level wage by gender compared to local minimum wage	N/A - Not deemed material in current assessment
202-2 Proportion of senior management hired from the local community	Typically 80-100% of senior leadership, i.e., the level of leadership below the most senior member of staff at a location is hired from the local community (the same country)
<b>GRI 203: Indirect economic impacts</b>	
3-3 Management of material topics	Affected Communities - IROs, Policies, Engagement, Actions, Targets and Governance
203-1 Infrastructure investments and services supported	Affected Communities - IROs, Policies, Engagement, Actions, Targets and Governance, Community engagement action
203-2 Significant indirect economic impacts	Affected Communities - IROs, Policies, Engagement, Actions, Targets and Governance, Community engagement action

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GRI DISCLOSURE REQUIREMENT	DISCLOSURE LOCATION
<b>GRI 204: Procurement practices</b>	
3-3 Management of material topics	G1-6 Payment Practices, Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance
204-1 Proportion of spending on local suppliers	Metrics related to payment practice; Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance
<b>GRI 205: Anti-corruption</b>	
3-3 Management of material topics	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance
205-1 Operations assessed for risks related to corruption	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance
205-2 Communication and training about anti-corruption policies and procedures	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance
205-3 Confirmed incidents of corruption and actions taken	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance, Metrics related to corruption or bribery
<b>GRI 206: Anti-competitive behavior</b>	
3-3 Management of material topics	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance
206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance
<b>GRI 207: Tax</b>	
3-3 Management of material topics	N/A - Not deemed material in current assessment
207-1 Approach to tax	N/A - Not deemed material in current assessment
207-2 Tax governance, control, and risk management	N/A - Not deemed material in current assessment
207-3 Stakeholder engagement and management of concerns related to tax	N/A - Not deemed material in current assessment
207-4 Country-by-country reporting	N/A - Not deemed material in current assessment

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GRI DISCLOSURE REQUIREMENT	DISCLOSURE LOCATION
<b>GRI 301: Materials</b>	
3-3 Management of material topics	Resource Use and Circular Economy IROs, Policies, Actions, Targets and Governance
301-1 Materials used by weight or volume	Resource Use and Circular Economy IROs, Policies, Actions, Targets and Governance; Materials use
301-2 Recycled input materials used	Resource Use and Circular Economy IROs, Policies, Actions, Targets and Governance; Materials use
301-3 Recycled input materials used	Resource Use and Circular Economy IROs, Policies, Actions, Targets and Governance; Materials use
<b>GRI 302: Energy</b>	
3-3 Management of material topics	Climate change IROs Transition Plan, Policies, Actions and Targets
302-1 Energy Consumption within the Organisation	Energy Consumption, PUE and metering
302-2 Energy consumption outside of the organization	Not currently measured
302-3 Energy intensity	Energy Consumption, PUE and metering
302-4 Reduction of energy consumption	Energy Consumption, PUE and metering
302-5 Reductions in energy requirements of products and services	Energy Consumption, PUE and metering
<b>GRI 303: Water and effluents</b>	
3-3 Management of material topics	Water IROs, Policies, Actions, Targets and Governance
303-1 Interactions with water as a shared resource	Water IROs, Policies, Actions, Targets and Governance
303-2 Management of water discharge-related impacts	Water IROs, Policies, Actions, Targets and Governance
303-3 Water withdrawal	Water Withdrawals, Discharges and WUE metrics
303-4 Water discharge	Water Withdrawals, Discharges and WUE metrics
303-5 Water consumption	Water Withdrawals, Discharges and WUE metrics

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GRI DISCLOSURE REQUIREMENT	DISCLOSURE LOCATION
<b>GRI 304: Biodiversity</b>	
3-3 Management of material topics	Biodiversity and Ecosystems IROs, Policies, Actions, Targets and Governance
304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Biodiversity and Ecosystems IROs, Policies, Actions, Targets and Governance
304-2 Significant impacts of activities, products and services on biodiversity	N/A
304-3 Habitats protected or restored	N/A
304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	N/A
<b>GRI 305: Carbon Emissions</b>	
3-3 Management of material topics	Climate change IROs Transition Plan, Policies, Actions and Targets
305-1 Direct (Scope 1) GHG emissions	Gross scope 1, 2, 3 GHG Emissions
305-2 Energy indirect (Scope 2) GHG emissions	Gross scope 1, 2, 3 GHG Emissions; Carbon Removals and Offsets
305-3 Other indirect (Scope 3) GHG emissions	Gross scope 1, 2, 3 GHG Emissions
305-4 GHG emissions intensity	Gross scope 1, 2, 3 GHG Emissions
305-5 Reduction of GHG emissions	Gross scope 1, 2, 3 GHG Emissions; Carbon Removals and Offsets
305-6 Emissions of ozone-depleting substances (ODS)	N/A - Not deemed material in current assessment
305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	N/A - Not deemed material in current assessment

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GRI DISCLOSURE REQUIREMENT	DISCLOSURE LOCATION
<b>GRI 306: Waste</b>	
3-3 Management of material topics	Resource Use and Circular Economy IROs, Policies, Actions, Targets and Governance
306-1 Waste generation and significant waste-related impacts	Resource Use and Circular Economy IROs, Policies, Actions, Targets and Governance
306-2 Management of significant waste-related impacts	Resource Use and Circular Economy IROs, Policies, Actions, Targets and Governance
306-3 Waste generated	End of life waste
306-4 Waste diverted from disposal	End of life waste
306-5 Waste directed to disposal	End of life waste
<b>GRI 308: Supplier environmental assessment</b>	
3-3 Management of material topics	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance; Workers in the value chain- IROs, Policies, Targets, Actions, Engagement and Governance
308-1 New suppliers that were screened using environmental criteria	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance; Workers in the value chain- IROs, Policies, Targets, Actions, Engagement and Governance
308-2 Negative environmental impacts in the supply chain and actions taken	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance; Workers in the value chain- IROs, Policies, Targets, Actions, Engagement and Governance
<b>GRI 401: Employment</b>	
3-3 Management of material topics	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Characteristics of employees and non-employees
401-1 New employee hires and employee turnover	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Characteristics of employees and non-employees
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance
401-3 Parental leave	Work-life balance metrics
<b>GRI 402: Labor/management relations</b>	
3-3 Management of material topics	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance
402-1 Minimum notice periods regarding operational changes	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance

## GRI INDEX

GRI DISCLOSURE REQUIREMENT	DISCLOSURE LOCATION
<b>GRI 403: Occupational health and safety</b>	
3-3 Management of material topics	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Health and Safety & Wellbeing
403-1 Occupational health and safety management system	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Health and Safety & Wellbeing
403-2 Hazard identification, risk assessment, and incident investigation	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Health and Safety & Wellbeing
403-3 Occupational health services	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Health and Safety & Wellbeing
403-4 Worker participation, consultation, and communication on occupational health and safety	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Health and Safety & Wellbeing
403-5 Worker training on occupational health and safety	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Health and Safety & Wellbeing
403-6 Promotion of worker health	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Health and Safety & Wellbeing
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Health and Safety & Wellbeing
403-8 Workers covered by an occupational health and safety management system	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Health and Safety & Wellbeing
403-9 Work-related injuries	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Health and Safety & Wellbeing
403-10 Work-related ill health	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Health and Safety & Wellbeing
<b>GRI 404: Training and education</b>	
3-3 Management of material topics	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance
404-1 Average hours of training per year per employee	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Training and skills development metrics
404-2 Programs for upgrading employee skills and transition assistance programs	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Training and skills development metrics
404-3 Percentage of employees receiving regular performance and career development reviews	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Training and skills development metrics

## GRI INDEX

GRI DISCLOSURE REQUIREMENT	DISCLOSURE LOCATION
<b>GRI 405: Diversity and equal opportunity</b>	
3-3 Management of material topics	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance
405-1 Diversity of governance bodies and employees	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance; Diversity metrics
405-2 Ratio of basic salary and remuneration of women to men	N/A - Not deemed material in current assessment
<b>GRI 406: Non-discrimination</b>	
3-3 Management of material topics	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance
406-1 Incidents of discrimination and corrective actions taken	Zero incidents of incidents of discrimination.
<b>GRI 407: Freedom of association and collective bargaining</b>	
3-3 Management of material topics	Own Workforce Material IROs, Policies, Engagement, Actions and Targets and Governance
407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Workers in the Value Chain-IROs, Policies, Targets, Actions, Engagement and Governance
<b>GRI 408: Child labor</b>	
3-3 Management of material topics	Workers in the Value Chain-IROs, Policies, Targets, Actions, Engagement and Governance
408-1 Operations and suppliers at significant risk for incidents of child labor	Workers in the Value Chain-IROs, Policies, Targets, Actions, Engagement and Governance
<b>GRI 409: Forced or compulsory labor</b>	
3-3 Management of material topics	Workers in the Value Chain-IROs, Policies, Targets, Actions, Engagement and Governance
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Workers in the Value Chain-IROs, Policies, Targets, Actions, Engagement and Governance
<b>GRI 410: Security practices</b>	
3-3 Management of material topics	N/A - Not deemed material in current assessment
410-1 Security personnel trained in human rights policies or procedures	N/A - Not deemed material in current assessment

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GRI DISCLOSURE REQUIREMENT	DISCLOSURE LOCATION
<b>GRI 411: Rights of indigenous peoples</b>	
3-3 Management of material topics	N/A - Not deemed material in current assessment
411-1 Incidents of violations involving rights of indigenous peoples	N/A - Not deemed material in current assessment
<b>GRI 413: Local communities</b>	
3-3 Management of material topics	Affected Communities - IROs, Policies, Engagement, Actions, Targets and Governance
413-1 Operations with local community engagement, impact assessments, and development programs	Affected Communities - IROs, Policies, Engagement, Actions, Targets and Governance
413-2 Operations with significant actual and potential negative impacts on local communities	Affected Communities - IROs, Policies, Engagement, Actions, Targets and Governance
<b>GRI 414: Supplier social assessment</b>	
3-3 Management of material topics	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance
414-1 New suppliers that were screened using social criteria	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance; Workers in the value chain- IROs, Policies, Targets, Actions, Engagement and Governance
414-2 Negative social impacts in the supply chain and actions taken	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance
<b>GRI 415: Public policy</b>	
3-3 Management of material topics	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance
415-1 Political contributions	Business Conduct - IROs, Policies, Engagement, Actions, Targets and Governance
<b>GRI 416: Customer health and safety</b>	
3-3 Management of material topics	Customers, consumers and end-users - IROs, Policies, Engagement, Actions, Targets and Governance
416-1 Assessment of the health and safety impacts of product and service categories	Customers, consumers and end-users - IROs, Policies, Engagement, Actions, Targets and Governance
416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	No incidents of non-compliance concerning the health and safety impacts of products and services

## GRI INDEX

GRI DISCLOSURE REQUIREMENT	DISCLOSURE LOCATION
<b>GRI 417: Marketing and labeling</b>	
3-3 Management of material topics	N/A - Not deemed material in current assessment
417-1 Requirements for product and service information and labeling	N/A - Not deemed material in current assessment
417-2 Incidents of non-compliance concerning product and service information and labeling	N/A - Not deemed material in current assessment. No incidents concerning product and service information and labeling
417-3 Incidents of non-compliance concerning marketing communications	N/A - Not deemed material in current assessment
<b>GRI 418: Customer privacy</b>	
3-3 Management of material topics	Customers, consumers and end-users - IROs, Policies, Engagement, Actions, Targets and Governance
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Customers, consumers and end-users - IROs, Policies, Engagement, Actions, Targets and Governance

# VERIFICATION STATEMENTS



General  
Disclosures

Environmental

Social

Governance

Appendices

## GHG VERIFICATION STATEMENT: LIMITED ASSURANCE

**Reporting Period:** 1<sup>st</sup> January 2025 – 31<sup>st</sup> December 2025

**Responsible Party:** Global Switch

### Introduction

Carbon Green Limited ('MyCarbon') was engaged by Global Switch to provide independent third-party verification of its Scope 1 and 2 greenhouse gas (GHG) emissions, as disclosed in the Global Switch's Corporate GHG inventory, for the period 1<sup>st</sup> January 2025 – 31<sup>st</sup> December 2025. This verification engagement was performed to a limited level of assurance, in accordance with the ISO 14064-3:2019 standard.

### Global Switch Responsibilities

The management of Global Switch is responsible for the preparation and fair presentation of the Global Switch's Corporate GHG inventory in accordance with the criteria. This responsibility includes the design, operation, and maintenance of internal controls relevant to the preparation of the GHG statement that is free from material misstatement, whether due to errors or omissions, to the extent possible given evolving methodologies.

### Our Responsibilities

Our responsibility as verifiers is to express an independent verification opinion on Global Switch's Corporate GHG inventory for the period 1<sup>st</sup> January 2025 – 31<sup>st</sup> December 2025, in accordance with the ISO 14064-3:2019 standard, based on the evidence obtained. We performed our verification engagement as agreed in the Contract and Engagement letter, which together defines the scope, objectives, criteria and level of assurance of the verification. The International Standard ISO 14064-3:2019 requires that we comply with ethical requirements and plan

and perform the verification to obtain the agreed level of assurance that the GHG emissions, removals and storage in the Global Switch's Corporate GHG inventory are free from material misstatement.

### Statement of Independence

No member of MyCarbon's verification team has any business relationship with Global Switch, its directors, or managers, beyond what is necessary for this verification engagement. We conducted our verification independently, and to our knowledge, there has been no conflict of interest.

### Verification Scope

Our verification engagement relates to the limited level of assurance on the specified GHG data for the CY25 reporting period disclosed in Global Switch's Corporate GHG inventory.

The following elements published in Global Switch's Corporate GHG inventory is within the scope of our limited assurance verification engagement:

- Boundaries: Operational control approach; Data centres and offices located in Amsterdam, Frankfurt, Hong Kong, London, Madrid, Paris and Singapore.
- GHG Sources, Sinks, and Reservoirs: Scope 1 and 2 emissions
- Types of GHGs: All seven Kyoto Protocol GHGs, where applicable, quantified in terms of tonnes carbon dioxide (CO<sub>2</sub>) equivalence, or tCO<sub>2</sub>e
- Time Period: 1<sup>st</sup> January 2025 – 31<sup>st</sup> December 2025

We have not performed any procedures regarding other information included in the Report; therefore, we do not express a verification opinion on the Report as a whole.

### Verification Criteria

The verification of on Global Switch's Corporate GHG inventory for CY25 was conducted according to the following criteria:

Reporting standards:

- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

This standard is jointly issued by the World Business Council for Sustainable Development and the World Resources Institute

- ISO 14064-1:2018

Emission Factors:

- Relevant for the reporting period and applied from published guidelines, including but not limited to:
  - Greenhouse Gas Reporting: Conversion Factors 2025 (DEFRA –Department for Environment, Food & Rural Affairs)
  - Emissions Factors 2025 (IEA)

Verification Standard:

- ISO 14064-3:2019

### Verification Strategy

Our verification strategy consisted of primarily inquiry and analytical procedures. Evidence-gathering procedures included but were not limited to:

- Engaging with stakeholders involved in data collection and reporting to:
  - review the data management processes, controls and methodologies used to compile Global Switch’s Corporate GHG inventory for CY25
- Sampling of utility records and refrigerant submissions to confirm accuracy of source data into calculations.
- Independent recalculation of reported emissions to verify mathematical accuracy and internal consistency of the underlying calculations.
- Appropriateness of emission factors used

The data examined during the verification engagement were historical in nature.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement.

### Verification Observations

All material errors, including data discrepancies and calculation errors, identified in the reported data during the verification process and documented in the query log, were corrected prior to the finalisation of the total GHG emissions.

For the CY25 reporting period, limited assurance has been provided over Global Switch’s reported market-based emissions. At the time of verification, Renewable Energy Guarantee of Origin (REGO) certificates for the reporting period were not available for review.

Our conclusion is based on Global Switch’s established history of procuring and retiring appropriate REGOs, together with management representations that equivalent certificates will be procured for CY25. On this basis, the associated risk is considered low for the purpose of limited assurance.

This conclusion is conditional upon the subsequent procurement and retirement of REGOs corresponding to the reported renewable electricity consumption, with final evidence to be retained and made available by 31st July 2026.

### Verification Opinion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that Global Switch’s Corporate GHG inventory for the period 1st January 2025 – 31st December 2025 is not prepared, in all material respects, in accordance with the criteria listed above as of 20 February 2026.

The total verified carbon footprint, subject to limited assurance, =for Global Switch for CY25 under the market-based approach was 71,227.10 tCO<sub>2</sub>e. Under the locationbased approach, emissions totalled 266,366.95tCO<sub>2</sub>e. The breakdown by Scope is listed in Table 1, with the full figures reviewed shown in Appendix 1 of this report.

**Table 1.** Verified emissions by Scope and Category under the market and location-based approach

EMISSIONS SCOPE & CATEGORY	MARKET-BASED EMISSIONS (tCO <sub>2</sub> e)	LOCATION-BASED EMISSIONS (tCO <sub>2</sub> e)
Scope 1	2,642.86	2,642.86
Scope 2	68,584.24	263,724.09
<b>TOTAL</b>	<b>71,227.10</b>	<b>266,366.95</b>

### Restriction of Use

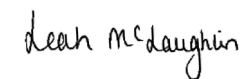
This report is made solely to Global Switch in accordance with the terms of our engagement letter and contract. It should not be disclosed to any third parties without prior written consent, except as permitted by those terms, which allow disclosure to other parties solely to demonstrate that Global Switch has obtained an independent third-party verification report in connection with the GHG statement. To the fullest extent permitted by law, we accept no responsibility and deny any liability to parties other than Global Switch for our work, for this independent third-party verification report or for the verification opinions we have reached.

### Appendix 1:

Statement of Assured Greenhouse Gas Emission Data for Global Switch CY25

GREENHOUSE GAS EMISSIONS	LOCATION-BASED EMISSIONS (tCO <sub>2</sub> e)	MARKET-BASED EMISSIONS (tCO <sub>2</sub> e)
<b>Scope 1</b>	<b>2,642.86</b>	<b>2,642.86</b>
Stationary Combustion	Natural Gas	267.27
	Diesel	1,290.94
Refrigerants	Refrigerants	1,084.64
<b>Scope 2</b>	<b>263,724.09</b>	<b>68,584.24</b>
Electricity Usage	Electricity	263,724.09
<b>Total Scope 1 &amp; 2 Emissions</b>	<b>266,366.95</b>	<b>71,227.10</b>

Verified and digitally signed by



Senior Carbon Consultant  
MyCarbon  
20 February 2026

## INDEPENDENT LIMITED ASSURANCE REPORT

To the Stakeholders of Global Switch:

FORLIANCE GmbH ('FORLIANCE' or 'we') was engaged by Global Switch to provide limited assurance over specific quantitative data related to Global Switch's greenhouse gas emissions described below for the year ended 31<sup>st</sup> December 2025.

### Assurance Scope

The scope of our work was limited to assurance over the following information (the 'Selected Information') presented in the document 'Scope 3 Global Switch - Dashboard for Forliance 2025':

- Scope 3 emissions (metric tonnes of CO<sub>2</sub>e): marked-based and location-based
- Scope 3 emissions split out by category (metric tonnes of CO<sub>2</sub>e): marked-based and location-based, where applicable

The time period covered was 1<sup>st</sup> January 2025 – 31<sup>st</sup> December 2025. We have not performed any work, and do not express any conclusion, over any other information that may be included in Global Switch's reports or displayed on Global Switch's website.

### Criteria Used

The Reporting Criteria we used to form our judgements are the 'Global Switch Methodology Statement' (the Statement) as well as:

- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- Corporate Value Chain (Scope 3) Standard

The Selected Information needs to be read together with the Statement.

### Assurance Standard Applied

We performed our work in accordance with International Standard on Assurance Engagements (UK) 3000 – 'Assurance Engagements other than Audits or Reviews of Historical Financial Information' ('ISAE (UK) 3000') issued by the Financial Reporting Council

### Limitations of our Engagement

The nature of non-financial information; the absence of a significant body of established practice on which to draw; and the methods and precision used to determine non-financial information, allow for different, but acceptable evaluation and measurement techniques and can result in materially different measurements, affecting comparability between entities and over time. The Selected Information has been measured applying the Reporting Criteria which has been developed solely for the purpose of providing this non-financial information. As such the Selected Information may not be suitable for another purpose.

### Responsibilities of GS

The management of GS is responsible for:

- designing, implementing and maintaining internal controls relevant to the preparation and presentation of the Selected Information that is free from material misstatement, whether due to fraud or error;
- selecting and/or developing objective Reporting Criteria;
- measuring and reporting the Selected Information in accordance with the Reporting Criteria; and
- the contents and statements contained within the Report and the Reporting Criteria.

### Responsibilities of FORLIANCE

Our responsibility was to plan and perform our work to obtain limited assurance about whether the Selected Information has been properly prepared, in all material respects, in accordance with the Reporting Criteria and to report to GS in the form of an independent limited assurance conclusion based on the work performed and the evidence obtained.

### Summary of Work Performed

Considering the level of assurance and our assessment of the risk of material misstatement of the Selected Information, whether due to fraud or error, our work included, but was not restricted to:

- assessing the appropriateness of the Reporting Criteria and methodologies applied for the Selected Information;
- reviewing the data collection and consolidation processes used to compile the Selected Information, including assessing assumptions made, and the data scope and reporting boundaries
- reconciling a selection of the Selected Information to the corresponding source documentation including performing analytical review procedures over selected data
- assessing calculation methodologies and formulas used (including the appropriateness of unit and carbon conversion factors) and manual calculations performed over the Selected Information;

The procedures undertaken in a limited assurance engagement differ in both nature and timing from those in a reasonable assurance engagement and are less comprehensive. Consequently, the level of assurance achieved in a limited assurance engagement is significantly lower than that which would be attained in a reasonable assurance engagement.

**Conclusion**

Based on the work we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Selected Information has not been properly prepared, in all material respects, in accordance with the Reporting Criteria.

**Independence, Professional Standards and Quality Control**

FORLIANCE affirms its independence, ethics and competence as follows:

- We have been appointed by GS, and no member of our assurance team has participated in compiling the GHG report.
- We uphold the integrity, objectivity, professional competence, due care, and confidentiality expected of a professional services provider, ensuring our work meets the rigor required by the ISAE 3000 standard.
- Our team possesses extensive experience in GHG reporting according to the GHG Corporate Accounting and Reporting Standard (revised), as well as the assurance and verification standard ISAE 3000.
- FORLIANCE implements quality control and management practices equivalent to the ISO 9001 International Standard. Our commitment to ethical conduct aligns with the standards expected of environmental and sustainability professionals in conducting ISAE 3000 engagements.

**Intended Use**

This assurance report is made solely to GS in accordance with the terms of the engagement contract between us.

2025

	VERIFIED AMOUNT MARKET-BASED (IN METRIC TONNES OF CO2e)	VERIFIED AMOUNT LOCATION-BASED (IN METRIC TONNES OF CO2e)
<b>Scope 3 Emissions</b>	<b>111,746.25</b>	<b>162,306.66</b>
Scope 3.1 Purchased goods and services	13,491.56	13,491.56
Scope 3.2 Capital goods	61,143.49	61,143.49
Scope 3.3 Fuel and energy related activities	35,670.06	86,221.78
Scope 3.5 Waste generated in operations	2.38	2.38
Scope 3.6 Business travel	1,259.82	1,259.82
Scope 3.7 Employee commuting	169.88	169.88
Scope 3.8 Upstream leased assets	0.00	0.00
Scope 3.13 Downstream leased assets	9.06	17.75

Verified and digitally signed by

Michael Sahl  
Director Climate Strategy  
FORLIANCE GmbH  
Bonn, March 12<sup>th</sup>, 2026

GLOBALSWITCH.COM

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