Global Switch

2024 ESG REPORT



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LETTER FROM THE CEO AND THE COO

Enabling sustainable growth through resilient digital infrastructure

A BUSINESS ROOTED IN PURPOSE AND PROGRESS

At Global Switch, we understand that our role as a data centre owner and operator carries responsibilities that go well beyond uptime and performance. Our infrastructure underpins digital economies and supports the development of more sustainable, inclusive, and connected communities. Our purpose is clear: to serve the people, societies, and economies of our home cities by delivering resilient, high-performance data centres that enable their digital futures.

Through this report, we are taking a further step in aligning our business reporting with the **EU Corporate Sustainability Reporting Directive (CSRD)** ahead of time, while continuing to report in line with the **Global Reporting Initiative (GRI)** standards. Our approach reflects our commitment to **double materiality** — understanding both how sustainability topics affect our business and how our business impacts people, the economy, and the environment.

CREATING VALUE THROUGH LONG-TERM SUSTAINABILITY COMMITMENTS

2024 was a year of continued progress for Global Switch as we sharpened our focus on strategic growth, operational efficiency, and sustainability leadership across our global platform.

We are proud that our near-term climate targets were validated by the Science Based Targets initiative (SBTi) in June 2025. These targets — including a 42% reduction in Scope 1 and 2 emissions, and in Scope 3 fuel-and energy-related activities by 2030 — are core to our transition strategy. We are also working from a 2030 baseline with capital goods suppliers to drive wider industry alignment, targeting 74% (by emissions) to have set their own SBTs by 2029.



Ashley Muldoon
Chief Executive Officer



Peter Domeney
Chief Operating Officer

> We are proud that our near-term climate targets were validated by the Science Based Targets initiative (SBTi) in June 2025.

We thank all our stakeholders for their continued trust and collaboration as we accelerate towards a lower-carbon, more resilient future.

Across our portfolio, we made strong operational advances. We achieved 90.6% renewable electricity use globally and secured EU Code of Conduct certification for energy efficiency across all our data centres. These outcomes reflect our commitment to integrating sustainability into every level of delivery.

Strategic milestones included a £500 million green bond issue, planning approval for the 27,000 m^2 expansion of our London South facility, and the divestment of our Australian operations — aligning capital deployment with our long-term vision.

We also strengthened our corporate culture, with the launch of both our RESPECT Committee and the Women in Data Centres initiative enhancing our approach to diversity, equity, and inclusion.

A STRATEGY SHAPED BY MATERIALITY AND MEGATRENDS

We operate in a fast-changing environment shaped by the rapid growth of AI, High Performance Compute, edge connectivity, and sovereign cloud infrastructure. Our strategy is focused on delivering scalable, sustainable solutions that anticipate these shifts while meeting customer expectations for performance, security, and sustainability.

Our business model draws on a powerful mix of capital:

- **Physical capital** – 8 large-scale data centres with 413,348 m^2 of technical space
- **Human capital** – 308 permanent employees and contractor teams ensuring the business operates 24/7
- **Intellectual capital** – Our Critical Environments Programme (CEP), advanced analytics, and digital modelling (BIM)
- **Financial capital** – A strong portfolio and capital from the sale of the Group's former Australian business for A$2.12 billion (December 2024)
- **Natural capital** – Majority renewable electricity, water-saving systems, and low-carbon infrastructure initiatives
- **Social capital** – A strong global connectivity ecosystem and active inclusion programmes

These resources underpin our ability to create long-term value while contributing to sustainable development goals.

LOOKING AHEAD

Looking forward, our focus is on delivery. Our **priorities** include:

Advancing our **decarbonisation** roadmap through deepening supplier and customer engagement to reduce emissions across the value chain

- Achieving full **renewable electricity** procurement group-wide
- Enhancing workforce systems and expanding **diversity, equity, and inclusion** across all regions and roles
- Strengthening water and energy efficiency in alignment with the **EU Climate Neutral Data Centre Pact**
- Maintaining a strong safety culture through our **Zero Harm** aim.
- Upgrading our **information security** controls under ISO 27001

We thank all our stakeholders for their continued trust and collaboration as we accelerate towards a lower-carbon, more resilient future.



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GLOBAL SWITCH AT A GLANCE

(ESRS 2 SBM-1, GRI 2-1, 2-2, 2-6, 2-7, 2-8)

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

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)

OPERATING FOOTPRINT AND GREEN BUILDING CERTIFICATIONS (END - 2024)

REGION	CAMPUS	GROSS FLOOR AREA	STATUS
London, UK	North, East & South (under development)	114,981 m^2	Existing & Expanding
Amsterdam, NL	West & East	73,061 m^2	Existing & Expanding
Frankfurt, DE	North & South	29,548 m^2	Existing
Paris, FR	East & West	51,618 m^2	Existing & Expanding
Madrid, ES	Madrid	21,922 m^2	Existing
Hong Kong, SAR	Tseung Kwan O	70,545 m^2	Existing
Singapore	Tai Seng	26,743 m^2	Existing
Singapore	Woodlands	24,930 m^2	Existing

Portfolio total: 413 348 m^2 of gross floor area GFA (existing and currently under development) across eight data centres in seven Tier-1 cities.

Green Building Certifications
As of 31 December 2024, Global Switch has achieved third-party green building certification at three of its data centre facilities:



Singapore – Woodlands
Green Mark Platinum (24,930 m^2)



Hong Kong – Tseung Kwan O
LEED Platinum (Phase 1 – Building 1&2, 22,574 m^2)



Amsterdam West
BREEAM Very Good (Hall 4 – 1,176 m^2)

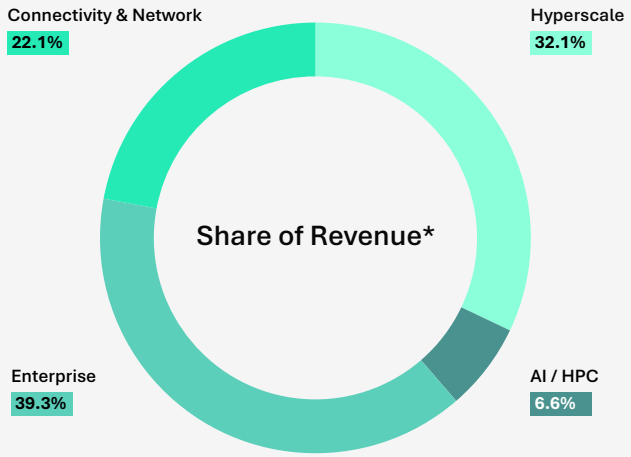
Together, the certified buildings account for approximately **48,680 m^2**, representing ~**12% of the Group's total GFA** (413,348 m^2).

The Group's heritage facilities do not currently hold green building certifications. However, under the **Facility Design Policy**, all new developments and major refurbishments are now required to pursue third-party environmental certification depending on location as outlined in the *Consolidated Table: Climate-Related Policies, Actions and Targets (in the section E1-2, E1-3 and E1-4 Climate Policies, Actions and Targets).*

CORE SERVICES

- Carrier-and cloud-neutral colocation (retail and wholesale)
- High-density suites for AI / HPC workloads
- Cross-connects and rich connectivity ecosystems
- Remote-hands, build-out and fit-out services
- Sustainability-linked solutions (green-power procurement, metering and reporting)

CUSTOMER SEGMENTATION (END-2024)



*Based on our total contracted revenue at the year end



WORKFORCE

As of 31 December 2024, Global Switch employed **306 permanent employees**, an increase of 31 compared with 2023. A specialised contractor workforce supports critical-environment operations and project delivery; two contractors were engaged as of the end of 2024, both based at the Corporate Office.

KEY 2024 HIGHLIGHTS



Science-based targets

Group-wide Scope 1, 2 & 3 **climate Science Based Targets set** (validated by the SBTi in June 2025)



Diversity, Equity & Inclusion

Launch of the corporate **RESPECT Committee** to enhance DEI, and **Women in Data Centres** initiative to promote industry



Renewable electricity

Achieved **90.6 % renewable electricity supply** across all facilities globally



ESG reporting

Global Switch is voluntarily aligning ahead of time with the EU Corporate Sustainability Reporting Directive (EU CSRD)



Energy efficiency

All data centres globally are now certified to the **EU Code of Conduct for Energy Efficiency in Data Centres**

MEMBERSHIPS AND VOLUNTARY COMMITMENTS

(ESRS 2 SBM-3; 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 Data Center Association
Nederland ICT
Nemo Museum
Eco-Verband der deutschen Internetwirtschaft
Spain Data Centre Association
Asia-Pacific Data Centre Association (APDCA) - Founding members
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

Climate Change	C	Water	C

An EcoVadis score of 62/100 and a Bronze Medal

BUSINESS MODEL & SUSTAINABLE VALUE CREATION

(ESRS 2 SBM-1 & SBM-2, GRI 2-22, 2-23)

Our purpose and value proposition are set out in the CEO Statement, which introduces this report. See CEO Statement for an overview of how Global Switch's business model draws on key resources and relationships to create long-term value.

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

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 plant, 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 topical-standard section.

KEY VALUE CHAIN ACTIVITIES

Upstream

- Energy from the grid
- Water from mains or industrial water
- Extraction of virgin raw materials and production of data centre building products, equipment, consumables, fuel from the supply chain

Own operations

Develop DC buildings

- Invest in land/new buildings
- Design and obtain planning permission for data centres
- Construct (select and manage building contractor partner) and deliver data centres
- Upgrade buildings and equipment/ technologies

Customer acquisition and management

- Lead generation and client acquisition
- Branding and communications

Operate

- Offering space, power and cooling
- Operation/Maintenance

Support functions

- Management and Leadership team
- Talent acquisition and management
- Procurement of services and equipment
- Legal
- Communications and Investor Relations
- Finance
- IT
- Office building management

Downstream

- End of life equipment
- Data centre buildings' redevelopment
- Consumable waste
- Waste heat

Outcomes

- **Facilitating a sustainable technology-enabled world.**

  We recognise the ultimate value of our ecosystems in enabling sustainable growth at the same time as they advance technology progress and decarbonisation across all sectors of human activity.

GOVERNANCE & ACCOUNTABILITY FOR SUSTAINABILITY

(ESRS 2 GOV-1 → GOV-5, GRI 2-9 → 2-15)

GOVERNANCE STRUCTURE AND OVERSIGHT OF SUSTAINABILITY MATTERS

(GOV-1, GRI 2-9, 2-10, 2-11, 2-12, 2-14, 2-15, 2-17, 2-18)

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 company 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 reviews ESG matters annually. At its annual strategy workshop, it considers the latest customer, investor and employee survey findings and, where necessary, adjusts ESG targets. Material ESG Risks arising between meetings are escalated via the ESG Committee through the Chief Operating Officer (COO) who represents the C-suite. The Board currently includes professionals with finance, data-centre operations, technology and international business backgrounds; the Board had an ESG briefing session delivered by the ESG Team in 2024 regarding current and emerging regulatory requirements and market expectations. In 2024, one of the seven Directors was 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, international markets and sustainability.



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MANAGEMENT'S ROLE IN SUSTAINABILITY GOVERNANCE

(GOV-2, GRI 2-13)

Day-to-day execution rests with the Executive Committee (CEO, CFO, COO, CCO, CLO and Group Directors). The Committee meets weekly and holds a formal management review each month, reporting outcomes to the Board.

The COO is the Board-delegated lead for environmental performance, health and safety and operational resilience. The COO participates in the ESG Leadership Steering Group, which draws senior leads from Finance, Legal, HR, Operations, Procurement and Commercial. Meeting at least every two months, the Steering Group sets ESG goals, allocates resources, monitors KPIs in an ESG Dashboard and oversees preparation of the annual ESG Report. From 2025 onwards, as part of strengthening the sustainability governance the ESG Group's meeting minutes are shared monthly and progress, as well as any potentially significant Risks or opportunities arising are recorded in an ESG Dashboard which is reported to the Executive Committee quarterly and to the Board once a year.

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

INTEGRATION OF SUSTAINABILITY INTO INCENTIVE SCHEMES

(GOV-3, GRI 2-19 → 2-20)

Remuneration is governed by the Board's Remuneration Sub-Committee. No ESG-specific KPIs were linked to variable pay in 2024 but the renumeration is linked to ESG KPIs from 2025 onwards, specifically relating to the Power Utilisation Efficiency (PUE) of the data centres.

INTERNAL CONTROL, RISK MANAGEMENT & ASSURANCE OF SUSTAINABILITY DATA

(GOV-5, GRI 2-14, 2-16, 2-23 → 2-26)

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Data flow and controls

Global Operations collate monthly KPI data - power utilisation efficiency (PUE), water utilisation efficiency (WUE), health & safety - and issue reporting which is held in the internal business Dashboard. These are reviewed at the Quarterly MD and Operations Directors Quarterly Leadership meetings.



Policy ownership

Operational policies (Critical Environments, Procurement, Power Management) are owned by the COO and managed day-to-day by the Operations Director and the Group Director of Procurement, ensuring consistent application across all facilities.



Risk management

The Executive Committee oversees Risk-management and internal-control systems. In 2024 a CSRD-aligned Double Materiality Assessment mapped ESG Impacts and Risks alongside traditional Risk registers.



Codes, statements and remediation

A company-wide Code of Conduct, Whistleblowing Policy and a Modern Slavery Statement (in line with the UK Modern Slavery Act 2015) define ethical standards and provide channels for reporting concerns. Environmental incidents and employee grievances are investigated and remediated under these policies.



Assurance

Scope 1-3 GHG data has received third-party limited assurance.



Regulatory readiness

The Legal, Finance and ESG teams monitor developments in CSRD/ESRS, UK SDR and related frameworks, mapping current disclosures to ESRS datapoints (GOV-1 → GOV-5, G1-1 → G1-6) and planning gap closures for the 2025 report cycle.

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SUSTAINABILITY DUE DILIGENCE PROCESS AND HUMAN RIGHTS COMMITMENTS

(GOV-4, GOV-5(e); 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, we have introduced 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.

The Importance of Sustainability Due Diligence

Sustainability due diligence (SDD) is crucial in today's business landscape, particularly in the data centre sector where energy consumption and environmental Impact are significant. It involves the systematic assessment of Risks and Impacts that business activities may have on society and the environment. This proactive approach ensures that companies identify, prevent, mitigate, and account for how they address their Impacts on human rights and environmental sustainability.

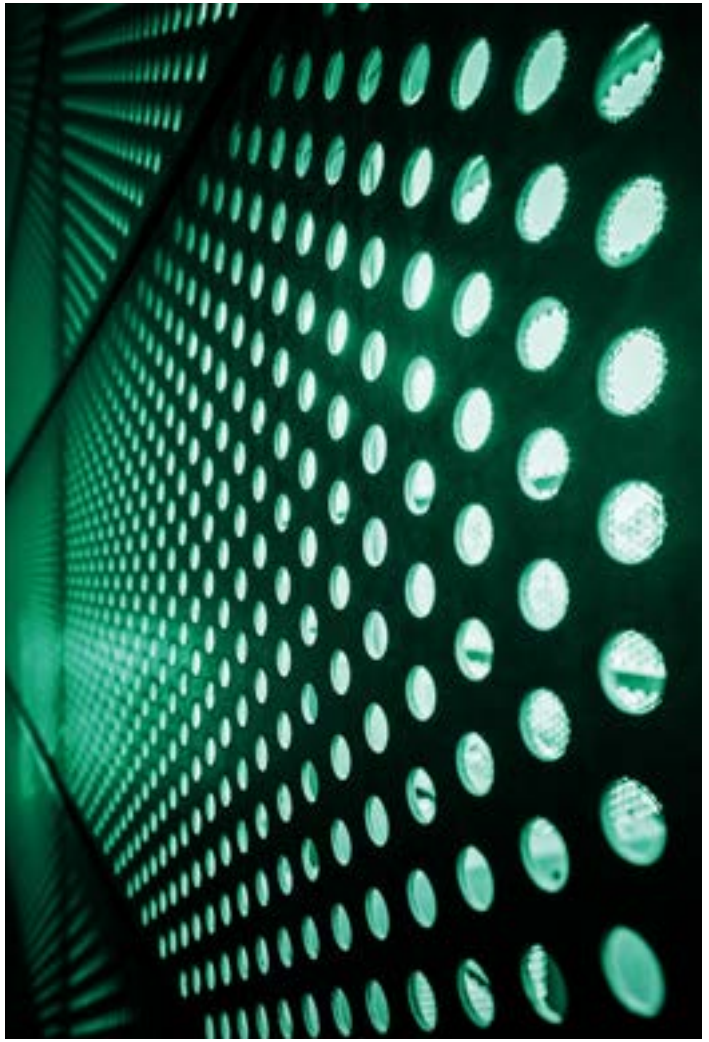
Global Switch operates globally with a worldwide value chain, including some regions facing potential human rights, corruption, and environmental challenges. Thus, we engage our value chain in SDD processes. Our SDD policy closely follows the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the UN Guiding Principles on Business and Human Rights (UNGP).

Our SDD process, which is based on the OECD Due Diligence Guidance for Responsible Business Conduct, informs the reporting requirements of the EU CSRD, specifically by identifying potential IROs (Impacts, Risks and Opportunities) in our value chain and affected communities as part of our Double Materiality Assessment.

The diagram on the next page illustrates our current performance and actions within the six OECD due diligence steps. It highlights our commitment to embedding responsible business conduct, identifying and assessing Impacts, taking preventive and mitigating actions, tracking results, communicating effectively, and providing remediation.

Sustainability Due Diligence Governance

Sustainability due diligence governance is a critical component of our overall strategy. Our SDD process is supervised by our Executive Management and carried out by the company ESG Steering Group, which includes C-suite members represented by the COO, as well as members from the business functions including members of the Group Legal, Procurement, HR and ESG and external advisors. Furthermore, Group Legal ensures that our Code of Conduct is drafted with a view to provide alignment with applicable international regulations. This alignment enables our operations to adhere to global standards, promoting ethical practices and compliance across our value chain. The process was last reviewed in July 2025 and is reviewed annually.



OUR SUSTAINABILITY DUE DILIGENCE FRAMEWORK

Our SDD framework is based on the six OECD due diligence steps for assessing, managing, mitigating Risks and implementing controls, as well as for remediation of adverse effects when appropriate.

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STEP 01

EMBED RESPONSIBLE BUSINESS CONDUCT INTO POLICIES AND MANAGEMENT SYSTEMS

The first step involves integrating sustainability and responsible business conduct into our company's policies and management systems. This includes setting clear expectations for ethical behaviour, establishing sustainability goals, and ensuring that these principles are reflected in our day-to-day operations.

- Code of Conduct
- Management Systems
- Engagement approaches
- Grievance mechanisms

STEP 02

IDENTIFY AND ASSESS ADVERSE IMPACTS

In this step, we systematically identify and assess potential adverse Impacts of our operations and value chain. This involves conducting Risk assessments and Impact studies to understand how our activities affect people and the environment. We also engage with stakeholders to gather insights and identify potential issues early. Stakeholders consulted include our own employees, our customers and supply chain, affected communities, industry bodies as well as local authorities and regulators, as needed.

- Scoping Responsible Business Conduct (RBC) impacts
- Impact assessment

STEP 03

CEASE, PREVENT, AND MITIGATE ADVERSE IMPACTS

Once adverse Impacts are identified, we take action to cease, prevent, and mitigate them. This may involve changing operational practices, improving supply chain management, or investing in sustainable technologies. Our goal is to minimise negative Impacts and enhance positive contributions to society and the environment.

- Report findings
- Engagement, leverage, and control
- Risk management implementation
- Follow-up

STEP 04

TRACK IMPLEMENTATION AND RESULTS

To ensure the effectiveness of our due diligence efforts, we track the implementation and results of our actions. This involves monitoring key performance indicators, conducting assessments, and reviewing progress against our sustainability objectives. Tracking helps us identify areas for improvement and measure the Impact of our initiatives.

- Annual internal review of sustainability due diligence process
- Annual third-party assurance

STEP 05

COMMUNICATE HOW IMPACTS ARE ADDRESSED

Transparency is a cornerstone of our SDD framework. We communicate openly about how we address adverse Impacts, sharing information with stakeholders through reports, meetings, and other channels. This fosters trust and accountability, ensuring that our actions align with our commitments to sustainability and responsible business conduct.

- Annual reporting

STEP 06

PROVIDE FOR OR COOPERATE IN REMEDIATION WHEN APPROPRIATE

When adverse Impacts occur, we take responsibility and provide for or cooperate in remediation. This may involve compensating affected parties, restoring damaged environments, or implementing corrective measures. Our approach to remediation is guided by principles of fairness, accountability, and respect for human rights. In the event that remediation measures are required, the COO and Chief Legal Officer will coordinate to jointly formulate and implement an appropriate action plan and timeline. The progress of any such remediation will be reported to the ESG Steering Group.

- Engage with impacted individuals or representatives
- Enable remediation proportionate to the significance and scale of the adverse impact

CURRENT PERFORMANCE AND ACTIONS

01

Embedding Responsible Business Conduct into Policies and Management Systems

We work closely with stakeholders—including expert advisors and employees—to manage human rights and environmental issues responsibly and uphold strong business practices. This includes clearly explaining individual rights and how we handle related concerns.

We also use informal methods such as our RESPECT Committee and staff surveys to gather input that can shape our policies. These channels help reflect the perspectives of key stakeholders, especially our employees.

02

Impact Identification and Assessment

Our SDD process aims to identify, evaluate, and address Risks related to human rights, corruption and environmental Impacts. Its goal is to prevent or reduce negative Impacts tied to our operations, or services and where needed, take action to fix those we've caused or contributed to.

Scoping
To spot actual or potential Risks, we reviewed our value chain—including upstream and downstream actors- and grouped them by activity, location, sector, and business relevance. This helps us focus on the areas most likely to pose Risks. Prioritisation is based on Risk levels, not on the strength of our business ties.

Impact Assessment
We assess stakeholders in the value chain against key ESG Impacts, Risks and opportunities. Any Risks found are rated based on how serious and likely they are.

03

Mitigating, Preventing, and Remedying

We address any identified adverse Impacts individually, taking appropriate action to stop or reduce them. When applicable, we also work to provide suitable remedies to those affected. In 2024, our SDD has not led to the identification of any actual Impacts where specific actions of mitigation or remedying were necessary.

We took note of any potential Impacts and communicated these efficiently to relevant internal stakeholders to ensure we continuously have adequate and mitigating measures implemented in our policy framework and internal processes.

04

Tracking Results

Our SDD is to be reviewed and assured annually.

05

Communication

We communicate our SDD framework, commitments, Impacts assessment and findings through the annual ESG Report.

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 encompasses 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 in section Overview of Sustainability-Related Policies for policies relating to Human Rights regarding our Employees and value chains.

Statement on due diligence information disclosure within this report (ESRS GOV-4)

OECD SDD STEP	CORE CONTENT IN	WHERE SUPPORTING DETAIL IS FOUND ELSEWHERE
1. Embed responsible business conduct	Code of Conduct, Supplier Code of Conduct, Modern Slavery Statement	• Governance structure • Policy Overview table • ESRS topical policies (E1, S1 etc.)
2. Identify & assess Impacts	Value-chain scoping, stakeholder engagement, Risk rating	• Stakeholder-engagement table (Summary of stakeholder engagement 2024-25) • Double-Materiality Assessment (DMA) results (Results: list of material topics) • Topical ESRS sections (E1–E4, S1–S4) – “Material Impacts” paragraphs
3. Cease, prevent, mitigate	Operational changes, supplier management, tech upgrades	• E-sections: energy, water, waste targets & actions • S-sections: labour & H&S programmes • G1 Business conduct controls
4. Track implementation & results	Annual SDD review and KPI monitoring	• MET-1 KPI table (ESG Targets and 2024 Progress) • Quarterly ESG dashboard reviewed by Executive Committee (Management’s role in sustainability governance)
5. Communicate	Annual ESG Report, stakeholder briefings	• Entire ESG Report (this document) • Stakeholder-engagement table (Summary of stakeholder engagement 2024-25)
6. Remediate	Process for compensation / corrective action (none required in 2024)	• Whistleblowing & grievance mechanisms (Sustainability risk & opportunity management) • Future incident reporting in topical ESRS sections

STAKEHOLDER ENGAGEMENT

(ESRS 2 IRO-1 (b) & SBM-3, GRI 2-29)

Stakeholder engagement forms a critical input into our Double Materiality Assessment. 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 as referenced in the right-hand column. The matrix of stakeholders, their engagement approach, their interests and the way their outputs are used is disclosed to ensure transparency and traceability.

METHODOLOGY FOR STAKEHOLDER PRIORITISATION

This prioritisation followed the **CSRD and ESRS guidance (IG 1 & IG 2)** and applies the two required lenses:

01

Impact Relevance

Used to identify stakeholders affected by our activities, especially in terms of environmental and social Impacts. Priority was assigned based on:

- Severity (scale, scope, irremediability)
- Vulnerability (e.g. silent stakeholders, communities)
- Legal and ethical responsibilities (e.g. employee safety, data protection)

02

Influence / Dependence

Used to identify stakeholders who can affect or are essential to our operations and financial outcomes:

- Investors, customers, and regulators were prioritised based on their decision-making influence and our strategic reliance on them
- Employees, suppliers, and debt investors were also high due to their operational and capital role

Stakeholder Types and Engagement Format

- Active engagement was performed where stakeholders were both highly Impacted and highly influential (e.g. customers, board, staff)
- Representative engagement was applied for groups harder to access or represent (e.g. silent stakeholders such as nature or children)
- Monitoring was applied for stakeholders with moderate influence or Impact

Type of Engagement

Active: Direct, two-way engagement: surveys, interviews, consultations

Representative: Engaged via proxies: desktop research, NGOs, third-party insights

Monitoring: Indirect or occasional tracking: publications, industry forums, media

General Disclosures
Environmental
Social
Governance
Appendices

SUMMARY OF STAKEHOLDER ENGAGEMENT 2024-25

STAKEHOLDER GROUP	INCLUDED PARTIES	WHY WE ENGAGE	HOW AND WHEN WE ENGAGE (Annual[1] unless otherwise stated)	HOW AND WHEN WE ENGAGED FOR THE ESG DMA 2024-2025	HOW THE ENGAGEMENT OUTPUTS ARE USED	RELEVANT POLICIES, TARGETS AND ACTIONS DESCRIPTION REFERENCE (disclosure section)
Shareholders	Equity holders, board-level investor representatives	Secure strategic oversight and formal validation of ESG strategy, Risk appetite and financing decisions.	• Board meeting (quarterly) • ESG briefings (ad hoc) • ESG Report	• ESG Briefing to the Shareholder	Shareholder endorsement of strategy.	ESRS 2 GOV-5, ESRS 2 SBM-3
Investor community and financial markets	Debt investors, banks, credit rating agencies Insurers Media and industry analysts indirectly via public trust	• Climate transition Risk metrics • ESG Risk ratings • Green-finance eligibility	• Investor presentations (ad hoc) • Annual report • ESG Report • Website (ad hoc) • 1-1 engagements (ad hoc) • ESG Materiality Survey • ESG rating platforms (e.g. CDP, EcoVadis) • ESG-related questionnaires received by investors (ad hoc)	• ESG materiality survey • Disclosures on ESG rating platforms, feedback received • Through desktop research on the ESG KPIs of rating agencies • Through considering the feedback specific to Global Switch received from rating agencies	Inputs shaped the prioritisation of topics for ESG Strategy development, ESG KPIs and the disclosures.	ESRS 2 IRO-1, ESRS 2 SBM-3, ESRS 2 GOV-5 (Risk management), ESRS E1, ESRS 2 SBM-3 ESRS 2 SBM-3 (Strategy & Business Model), G1 (Business Conduct)
Board & Executive Committee	Senior executives, board of directors	Integrate ESG into corporate strategy; approve Risk controls and KPIs.	• Board meetings (quarterly) • Board papers (quarterly) • Ad hoc update by the ESG Steering Group • ESG Materiality survey and validation discussions • ESG Report	• Board papers • Internal ESG Materiality Survey • ESG steering group updates • Strategic ESG validation discussions	Outputs guide corporate strategy refresh, Risk appetite, executive incentives and operational ESG targets.	ESRS 2 GOV-1, GOV-2, GOV-5

[1]Ad-hoc engagements occur at least annually and more frequently, as required.

SUMMARY OF STAKEHOLDER ENGAGEMENT 2024-25

STAKEHOLDER GROUP	INCLUDED PARTIES	WHY WE ENGAGE	HOW AND WHEN WE ENGAGE (Annual[1] unless otherwise stated)	HOW AND WHEN WE ENGAGED FOR THE ESG DMA 2024-2025	HOW THE ENGAGEMENT OUTPUTS ARE USED	RELEVANT POLICIES, TARGETS AND ACTIONS DESCRIPTION REFERENCE (disclosure section)
ESG Steering Group	ESG cross-functional leaders	Coordinate implementation of ESG road-map and monitor progress.	Monthly ESG strategy meetings	• Internal ESG Materiality Survey • Reviewed DMA scoring drafts	Steering-Group insights direct project sequencing, resource allocation and quarterly ESG performance reporting. Validated Impact & financial-effect scores.	ESRS 2 GOV-5, ESRS 2 IRO-1
Employees / Staff and advisors	Facility staff, developments team, engineers, critical environments team, commercial, marketing and communications, IT, HR, procurement, finance, legal, sales and customer teams, internal audit, ISO auditors	Capture workforce perspectives on material ESG issues; foster engagement and DEI.	• Performance and career reviews • Staff induction • HR meetings (ad hoc) • Work councils • Staff engagement survey • ESG Materiality Survey • Grievance mechanisms • Company intranet (The Switch) (ad hoc) • Company ESG briefing sessions • Social media (ad hoc) • ESG report • Website (ad hoc)	• ESG materiality workshops • Internal ESG Materiality Survey • Staff engagement survey • Grievance mechanisms	Survey and workshop feedback drives DEI programmes, training content, well-being initiatives and internal communications.	S1-1 to S1-16, ESRS 2 SBM-3,ESRS 2 GOV-5 (Risk & internal control)
Customers	Cloud providers, enterprises, customer IT teams, brokers	Understand client ESG expectations (renewables, PUE, transparency) and maintain competitiveness.	• Regular meetings (ad hoc) • ESG Report • ESG rating platforms (CDP, EcoVadis) • ESG-related questionnaires at tender stage (ad hoc) • Industry events (ad hoc) • Website (ad hoc) • ESG Materiality Survey • Customer support line • Customer / occupier satisfaction survey	• External ESG Materiality Survey • Thorough desktop research for the top customers/ prospective customers	Customer inputs shape renewable-energy sourcing, PUE targets, product features and client-facing ESG reporting.	ESRS 2 SBM-3, IRO-1, S4-2

SUMMARY OF STAKEHOLDER ENGAGEMENT 2024-25

STAKEHOLDER GROUP	INCLUDED PARTIES	WHY WE ENGAGE	HOW AND WHEN WE ENGAGE (Annual[1] unless otherwise stated)	HOW AND WHEN WE ENGAGED FOR THE ESG DMA 2024-2025	HOW THE ENGAGEMENT OUTPUTS ARE USED	RELEVANT POLICIES, TARGETS AND ACTIONS DESCRIPTION REFERENCE (disclosure section)
Suppliers & Infrastructure partners	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	Assess supply-chain ESG performance; secure resilient, low-carbon inputs.	• Supplier meetings (ad hoc) • Social media (ad hoc) • Industry events (ad hoc) • ESG Materiality Survey • ESG report • Website (ad hoc)	• External ESG Materiality Survey	Supplier scores inform procurement criteria, supplier-engagement plans, contract clauses and Risk-mitigation actions.	ESRS S2-1 to S2-5, ESRS 2 IRO-1, ESRS 2 SBM-3, E1-5/E1-6 (site-level emissions), G1 (Business conduct)
Local Communities	Residents, neighbours, local shops or members of the public near facilities, waste heat recipients, local universities	Address construction Impacts and community benefits (noise, traffic, water, skills).	• Ad hoc contact with site teams • Public consultation during developments' planning stage (ad hoc) • Through Social issues-related NGOs (ad hoc) • Social media • ESG report (ad hoc) • Website (ad hoc)	• Through interviews from the site teams on what matters to their local communities	Community views tailor construction-Impact mitigation, local employment schemes and community-benefit partnerships.	ESRS 2 IRO-1, S3 (Communities), G1 (Business conduct)
Governments & Regulators	Government technology departments, Permitting bodies, environmental regulators, city councils, emergency services	Ensure licence-to-operate and anticipate regulatory changes.	• Regulatory consultations (ad hoc) • Permit processes (ad hoc) • Compliance briefings (ad hoc)	• Desktop study on what is important to regulators as expressed in compliance requirements	Regulator guidance sets compliance procedures, environmental-management programmes and future expansion design.	ESRS 2 GOV-5, IRO-1, topical DRs (E/S/G), ESRS GOV-5, ESRS E1
Industry Bodies & NGOs	Sector associations, environmental and social NGOs, universities	Benchmark against voluntary ESG commitments; contribute to industry policy.	• Membership committees (ad hoc) • Industry events (ad hoc) • ESG Materiality Survey • Social media (ad hoc) • ESG report	• Actively: External ESG Materiality Survey • Desktop study on Industry voluntary ESG commitments	Industry and NGO insights steer advocacy positions, voluntary commitments and benchmarking of best practice.	ESRS 2 SBM-3, topical DRs, ESRS 2 SBM-3 (Strategy & innovation), S3 (Communities), G1 (Business conduct)

SUMMARY OF STAKEHOLDER ENGAGEMENT 2024-25

STAKEHOLDER GROUP	INCLUDED PARTIES	WHY WE ENGAGE	HOW AND WHEN WE ENGAGE (Annual[1] unless otherwise stated)	HOW AND WHEN WE ENGAGED FOR THE ESG DMA 2024-2025	HOW THE ENGAGEMENT OUTPUTS ARE USED	RELEVANT POLICIES, TARGETS AND ACTIONS DESCRIPTION REFERENCE (disclosure section)
Value Chain Workers	Tier-1 and tier-2 subcontractor staff, warehouse/logistics personnel	Monitor potential and actual Impacts and Risks as well as labour-rights Risks in the extended supply chain.	• Supply chain desktop analysis • Grievance mechanism	• Desktop study on what is important as expressed in best practice ESG disclosure requirements • Supply chain desktop analysis • Grievance mechanism	Findings adjust contractor H&S training, audit schedules and labour-standards clauses in contracts.	S2-1 to S2-5, SBM-3
The Natural Environment	Water resources, biodiversity, ecosystems (via NGOs, proxies)	Identify environmental dependencies and Impacts to inform targets.	• Environmental assessments for ISO14001 • Lifecycle studies for materials in new developments (ad hoc) • Proxy indicators (e.g. SBTi) (ad hoc)	• Environmental assessments for ISO14001, • Lifecycle studies for materials in new developments, • Proxy indicators (e.g. SBTi, best practice ESG disclosure requirements, ESG materiality)	Assessments underpin environmental targets and low-carbon design specifications.	E1, E2, E4 topical DRs
End Users / Customers of Customers	General public, digital consumers, children (vulnerable users)	Understand downstream reliability and social-Impact expectations.	• Survey insights from key customers (ad hoc) • Desktop research • Materiality validation	• Survey insights from key customers • Desktop research • Materiality validation	End-user perspectives guide reliability standards.	S4-2, ESRS 2 SBM-3

DOUBLE MATERIALITY ASSESSMENT

(ESRS 1 §2.1; ESRS 2 IRO-1; GRI 3-1, 3-2)

REPORTING BOUNDARY, TIME PERIOD & HORIZONS

The Double Materiality Assessment (DMA) applies the same reporting boundary and 2024 reporting period set out in Section 1.1. Forward-looking horizons are defined as short term (2024), medium term (2025-2030) and long term (2031 and beyond). For climate-scenario analysis, the periods 2020-2029 and 2030-2039 were used.

METHODOLOGY OVERVIEW — KEY DMA STEPS

To determine which sustainability matters are material for both Impact and financial reporting, Global Switch followed the step-by-step process prescribed in ESRS and GRI guidance. The seven steps below show how the long list of potential Impacts, Risks and Opportunities (IROs) was generated, scored against clearly defined Impact and financial-materiality criteria; matters that met our internal significance threshold were classified as material and finally validated for inclusion in this report.

ESRS / GRI DMA STEP		DMA METHODOLOGY (CALENDAR YEAR 2024)
01	Define the value-chain scope	Mapped 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.
02	Identify potential sustainability matters	Built a long-list of Impacts, Risks & Opportunities (IROs) by screening ESRS1 (Article 16) & GRI topic standards, reviewing prior disclosures, peer benchmarks, supplier-ESG research and the corporate climate-Risk register.
03	Gather evidence & stakeholder input	Collected qualitative and quantitative input via 16 cross-functional workshops, an internal ESG materiality survey and targeted external surveys of key customers, debt investors, banks, top suppliers, industry NGOs and ESG experts supplemented by desktop research on regulatory trends.
04	Assess Impact materiality	Scored 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.
05	Assess financial materiality	Scored 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.
06	Determine material topics	Any topic scoring ≥ 6.0 on either lens was classified as material. Each was tagged actual vs. potential and assigned to short-, medium- or long-term horizon.
07	Validate & approve results	Impact and financial scores, plus underlying rationales, were reviewed by designated subject-matter experts (Engineering, HR, Procurement, Operations, Legal, Sales). The complete DMA was formally approved by the Chief Operating Officer and the DMA methodology by Group Financial Controller in May and June 2025. See also table on next page.
08	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.

VALIDATION & APPROVAL OF DMA RESULTS

ESRS TOPIC AREA(S)	DMA PREPARED BY	KEY INTERNAL SUBJECT MATTER EXPERTS (SMES) CONSULTED	KEY INPUTS	INTERNAL VALIDATION BY	FINAL DMA & METHODOLOGY APPROVED BY
E1 – E4 Environmental topics (Climate, Pollution, Water, Resource Use & Circularity)	Group ESG Consultant	Engineering, Delivery and Operations Teams	Policies, workshops and questionnaires, Climate-Risk register modelling; GS Peers ESG Scorecard benchmarks; 2024 GHG, energy, water-use & waste datasets	Solutions Engineering Director	COO
S1 Own workforce (incl. Health & Safety)	Group ESG Consultant	HR Team, Operations Teams	Policies, workshops, Internal ESG-materiality survey; employee-engagement survey; 2024 workforce KPIs & H&S incident logs	Group HR Director & Group Operations Director	COO
S2 Value-chain workers	Group ESG Consultant	Delivery Team, Group Procurement Director	Policies relating to suppliers, workshops and questionnaires, Top-100 Supplier ESG survey & desktop analysis; supplier-Risk scores; contractor-labour data	Group Procurement Director	COO
S3 Affected communities	Group ESG Consultant	Operations Teams, Delivery Team, Group HR Director, COO	Workshops and questionnaires, workshop notes on community concerns	Group HR Director & COO	COO
S4 Customers, Consumers / end-users	Group ESG Consultant	Customers & Sales Team, Operations Teams, Group Information Director, COO	Customer ESG questionnaires; peer/ customer ESG matrix; service-reliability & uptime metrics	Bid Management Director	COO
G1 Business conduct	Group ESG Consultant	COO, Procurement, Legal Team, Finance Team	Policies, workshops, External legal-ethics benchmarking; compliance-incident register; policy-gap analysis	Senior Legal Counsel, Delivery	COO



RESULTS: LIST OF MATERIAL TOPICS

ESRS STANDARD	TOPIC	MATERIAL IRO DESCRIPTION	IRO CLASSIFICATION	LOCATION IN VALUE CHAIN	TIME HORIZON	INTERACTION WITH BUSINESS MODEL / STRATEGY	ESRS DISCLOSURE SECTION
E1- Climate Change	Climate-change mitigation	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).	**Actual negative impact**	Upstream / Own Ops / Downstream	2024 / 2025-30 / 2031+	Lifecycle GHG drives cost and client Net-Zero criteria; ~90 % renewable electricity plus 1.5 °C-aligned SBTs are embedded in the Facility Design Policy and forthcoming Climate-Transition Plan.	E1-6, E1-1, E1-4
	Energy use (grid relief)	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.	**Potential positive impact**	Downstream	2025-30 / 2031+	Backup-generator support can enhance social licence and customer loyalty; Opportunity under review for formal programme.	E1-1, E1-3
	Climate adaptation	Global Switch faces operational and infrastructure Risks due to climate change, including: early replacement of cooling equipment, water stress, ground instability, workforce H&S Risks, supplier disruption.	**Risk**	Upstream / Own Ops	2025-30 / 2031+	Cooling-Capex and downtime Risk managed via Climate Risk Register, Facility Design Policy and planned Business Continuity Plan.	E1-1, E1-2, E1-3, E1-4
	Climate-transition plan	Costs for transitioning to low-carbon / net-zero-carbon data centres can temporarily affect profitability if upgrades fall outside current business-plan timing or if supply-chain delays arise.	**Risk**	Upstream / Own Ops	2025-30 / 2031+	Detailed Transition Plan is being aligned with the financial plan; SBTs, PPAs and Climanomics resilience assessments guide phased spend.	E1-2, E1-4, E1-1
	Energy efficiency & security	Due to the energy-intensive nature of data-centre operations, especially with projected AI demand growth, energy security and energy efficiency can affect service continuity, customer retention, access to finance and future development.	**Risk**	Upstream / Own Ops	2025-30 / 2031+	PUE-reduction targets and long-term PPAs (Facility Design Policy) protect uptime and financing capacity.	E1-1, E1-5, E1-2

RESULTS: LIST OF MATERIAL TOPICS

ESRS STANDARD	TOPIC	MATERIAL IRO DESCRIPTION	IRO CLASSIFICATION	LOCATION IN VALUE CHAIN	TIME HORIZON	INTERACTION WITH BUSINESS MODEL / STRATEGY	ESRS DISCLOSURE SECTION
E3- Water and marine resources	Water consumption	High water consumption for cooling may damage community relationships, reputational standing, or complicate licence renewals or expansions, especially in regions with increasing water scarcity.	**Risk**	Upstream / Own Ops	2025-30 / 2031+	WUE targets and water-less cooling options embedded in Facility Design Policy safeguard growth approvals.	E3-1, E3-2, E3-5
	Water withdrawals	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	2025-30 / 2031+	Policy preference for recycled / industrial water and closed-loop systems mitigates cost and regulatory exposure.	E3-1, E3-2, E3-5, E3-6
E5-Resource use and circular economy	Raw-material inflows	Global Switch Impacts natural resources through its supply-chain use of raw materials and minerals for construction, refurbishment, fit-out and maintenance of its data centres.	**Actual negative impact**	Upstream	2024 / 2025-30	LCAs and recycled-content targets (when green building certifications are targeted) mandated by Facility Design Policy reduce virgin-material demand.	E5-1, E5-3
	Solid waste / end-of-life materials	Resource outflows from Global Switch operations include mainly construction waste and decommissioned IT equipment which may contribute to environmental degradation and lost circular value.	**Actual negative impact**	Own Ops	2024 / 2025-30 / 2031+	ESG Targets & Commitments set 100 % diversion-from-landfill by 2030; site waste-management plans drive progress.	E5-2, E5-3
	Waste heat	Global Switch generates significant waste heat from server operations. When released without recovery or reuse, this may contribute to the urban-heat-island effect, particularly in densely populated areas.	**Actual negative impact**	Own Ops	2024 / 2025-30 / 2031+	New data-centre designs include heat-recovery interfaces per Facility Design Policy, enabling future district-heating partnerships.	E1-1, E5 (entity-specific)
	Raw-material inflows	Growing scarcity of critical minerals (e.g. rare-earth elements) needed for technology infrastructure may drive up procurement costs and expose the business to supply-chain disruptions.	**Risk**	Own Ops	2024 / 2025-30 / 2031+	Critical-mineral scarcity can increase Capex and supply Risk; the Facility Design Policy promotes circular-material use and recycled content to improve resource efficiency and resilience.	E5-1

RESULTS: LIST OF MATERIAL TOPICS

ESRS STANDARD	TOPIC	MATERIAL IRO DESCRIPTION	IRO CLASSIFICATION	LOCATION IN VALUE CHAIN	TIME HORIZON	INTERACTION WITH BUSINESS MODEL / STRATEGY	ESRS DISCLOSURE SECTION
S1-Own workforce	Secure employment	Secure employment promotes job stability and financial security for employees, supporting livelihoods and local economic resilience.	**Actual positive impact**	Own Ops	2024 / 2025-30 / 2031+	Rigorous recruitment, revamped appraisal and succession planning (Employee Handbook and Talent Review and Succession Planning Toolkit) boost retention and local value.	S1-1, S1-9
	Adequate wages	Fair and adequate wages reduce economic stress and improve motivation, job satisfaction and retention.	**Actual positive impact**	Own Ops	2024 / 2025-30 / 2031+	Market benchmarking keeps salaries competitive;	S1-1, S1-6
	Freedom of association	Freedom of association enables employees to organise, express concerns and engage in collective advocacy, enhancing workplace rights and participation.	**Actual positive impact**	Own Ops	2024 / 2025-30 / 2031+	Works councils in France & Germany ensure legal compliance and employee voice.	S1-2, S1-8
	Work-life balance	Work-life balance can reduce stress and mental-health challenges, improving employee morale and performance.	**Potential positive impact**	Own Ops	2024 / 2025-30 / 2031+	Flexible-working, RTT policy (FR) and global Myndup service support well-being.	S1-1, S1-4
	Training & skills (own workforce)	Training and skills development build employee competencies, improve job performance and support career growth.	**Actual positive impact**	Own Ops	2024 / 2025-30 / 2031+	LinkedIn Learning, coaching and technical upskilling (Talent Review Toolkit) boost productivity and retention.	S1-3, S1-9
	Employee privacy	Inadequate protection of employee privacy may breach fundamental rights and erode trust in the workplace.	**Potential negative impact**	Own Ops	2024 / 2025-30 / 2031+	ISO 27001 controls and data-security training protect personal information.	S1-2, S1-7
	Diversity & inclusion	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 Ops	2024 / 2025-30 / 2031+	Equal-Opportunities Policy, global unconscious-bias training and Respect Committee drive DEI progress.	S1-15

RESULTS: LIST OF MATERIAL TOPICS

ESRS STANDARD	TOPIC	MATERIAL IRO DESCRIPTION	IRO CLASSIFICATION	LOCATION IN VALUE CHAIN	TIME HORIZON	INTERACTION WITH BUSINESS MODEL / STRATEGY	ESRS DISCLOSURE SECTION
S2 - Workers in the Value Chain	Working time (value-chain)	Global Switch may be linked to excessive or unregulated working hours in its value chain, particularly where cost or delivery pressures on suppliers lead to extended shifts or limited rest time—posing Risks to worker health and well-being.	POTENTIAL NEGATIVE IMPACT	Upstream	2024 / 2025-30 / 2031+	Supplier Code of Conduct (SCoC) requires legal working hours and monitoring.	S2-1, S2-2
	Health & safety (value-chain)	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	2024 / 2025-30 / 2031+	Procurement policy and SCoC demand competent contractors and H&S compliance (GS H&S Policy).	S2-1, S2-3
	Child labour	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	2024 / 2025-30 / 2031+	SCoC mandates supplier due diligence to prevent child labour.	S2-1, S2-3
	Forced labour	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	2024 / 2025-30 / 2031+	SCoC prohibits recruitment fees and debt bondage.	S2-1, S2-3
	Supplier Privacy	Global Switch may be indirectly linked to privacy violations in its supply chain where suppliers mishandle personal worker data, exposing individuals to surveillance or exploitation.	POTENTIAL NEGATIVE IMPACT	Upstream	2024 / 2025-30 / 2031+	SCoC drives data-protection diligence for worker information.	S2-1

RESULTS: LIST OF MATERIAL TOPICS

ESRS STANDARD	TOPIC	MATERIAL IRO DESCRIPTION	IRO CLASSIFICATION	LOCATION IN VALUE CHAIN	TIME HORIZON	INTERACTION WITH BUSINESS MODEL / STRATEGY	ESRS DISCLOSURE SECTION
S4 -Customers, consumers and end-users	Customer and end-user privacy	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 ops	2024 / 2025-30 / 2031+	The business ISO27001-certified information security processes safeguard data and systems.	S4
	Personal safety and access to information of consumers/ end-users	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 Ops	2024 / 2025-30 / 2031+	The Risk Management policy provides the basis for assessing, managing and mitigating Risks.	S4
G1-Business Conduct	Corporate culture	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	Upstream / Own Ops	2024 / 2025-30 / 2031+	Business Code of Conduct and anti-corruption training underpin trust and engagement.	G1-1, GOV-1
	Whistleblower protection	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 Ops	2024 / 2025-30 / 2031+	Whistleblowing Policy and SCoC encourage early issue reporting and transparency.	G1-3
	Supplier relationships	Weak oversight of supplier relationships across Global Switch's value chain can increase the Risk of ESG violations (e.g. labour, environmental), especially in lower-tier suppliers.	POTENTIAL NEGATIVE IMPACT	Upstream / Own Ops	2024 / 2025-30 / 2031+	SCoC and Supplier-Payment Policy manage ESG compliance and timely payments.	G1-1, G1-6

RESULTS: LIST OF MATERIAL TOPICS

ESRS STANDARD	TOPIC	MATERIAL IRO DESCRIPTION	IRO CLASSIFICATION	LOCATION IN VALUE CHAIN	TIME HORIZON	INTERACTION WITH BUSINESS MODEL / STRATEGY	ESRS DISCLOSURE SECTION
G1-Business Conduct	Payment practices	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 / Own Ops	2024 / 2025-30 / 2031+	Supplier-Payment Policy aims for equitable, on-time settlements.	G1-6
	Transparent reporting	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 Ops	2024 / 2025-30 / 2031+	Annual ESG Report, EcoVadis and CDP submissions enable customer benchmarking.	G1-1
	Industry memberships	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 company in these forums also benefit personally by gaining new insights and professional development opportunities.	ACTUAL POSITIVE IMPACT	Own Ops	2024 / 2025-30 / 2031+	Memberships foster ethical collaboration and staff development.	G1-1
	Whistleblower protection (Risk)	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	2024 / 2025-30 / 2031+	Whistleblowing Policy safeguards transparency; escalations reach Audit Committee.	G1-3
	Supplier ESG Risk	Potential Risk from suppliers not adhering to 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	2024 / 2025-30 / 2031+	SCoC and contractual clauses require suppliers to meet ESG and legal standards.	G1-1, G1-6

RESULTS: LIST OF MATERIAL TOPICS

ESRS STANDARD	TOPIC	MATERIAL IRO DESCRIPTION	IRO CLASSIFICATION	LOCATION IN VALUE CHAIN	TIME HORIZON	INTERACTION WITH BUSINESS MODEL / STRATEGY	ESRS DISCLOSURE SECTION
G1-Business Conduct	Anti-corruption & bribery	Engaging in corrupt practices or failing to conduct adequate due diligence on customers and suppliers (e.g. sanction checks) can lead to legal actions, regulatory penalties, reputational damage, and loss of business opportunities.	RISK	Upstream / Own Ops	2024 / 2025-30 / 2031+	Anti-Corruption Policy and mandatory MetaCompliance training mitigate these Risks.	G1-4

SUSTAINABILITY RISK & OPPORTUNITY MANAGEMENT

(ESRS 2 IRO-3; ESRS 2 GOV-5 (d), GRI 2-11, 2-23, 2-25, 2-26)

INTEGRATION WITH THE BUSINESS-RISK FRAMEWORK

Global Switch applies the **same 1-to-5 likelihood-and-Impact scale and financial-threshold bands** to sustainability matters as to all other enterprise Risks. This was the first year the business conducted an ESG Double Materiality Assessment (DMA). Going forward it is planned that the results of the DMA to be transferred into the **corporate Risk** register, which is jointly custodied by the **Chief Operating Officer** and the **Group Finance Director**. The consolidated register is to be reviewed with the Executive Committee and included in the annual Board ESG briefing.

RISK-APPETITE & ESCALATION

Although the Board has not issued a standalone ESG-Risk-appetite statement, it operates a **"tolerate-with-controls"** posture: sustainability Risks are acceptable only when they remain within the financial thresholds set for all corporate Risks and are mitigated by documented controls.

Escalation follows the quarterly cycle below (all timings refer to the financial year):

QUARTER	GOVERNANCE ACTIVITY	OUTCOME
Q1 Annual reporting	Board receives the ESG Report, including the prior-year list of material IROs.	Shareholders and stakeholders are informed of policy effectiveness, actions, metrics and targets.
Q2 IRO reporting	ESG Steering Group presents the refreshed DMA results to the Executive Committee; ExCo submits recommendations to the Board.	Board integrates material IROs into forward decision-making and capital allocation.
Q3 IRO deep-dive	ESG Steering Group examines how the material IROs set the disclosure scope for the coming ESG Report (full ESRS mapping).	Shareholders and stakeholders are informed of policy effectiveness, actions, metrics and targets.
Q4 Impact & policy review	ESG Steering Group, ExCo and Board assess progress on mitigation actions and decide whether policies or due diligence (SDD) processes require adjustment.	Risk Register updated; actions rolled into next budget.

From 2025 the Remuneration Committee will assess Executive pay against sustainability KPIs.

DUE DILIGENCE PROCESS (SUMMARY)

Global Switch's due diligence framework follows the six OECD steps (see Our Sustainability Due Diligence Framework). The ESG Steering Group oversees implementation; material findings feed directly into the corporate Risk register each year.

GRIEVANCE & REMEDIATION MECHANISMS

Employees, suppliers and external stakeholders can raise concerns **24 / 7 by email**, using the addresses published in the Employee Handbook, the Code of Conduct, the Whistleblowing Policy and the Supplier Code of Conduct (SCoC). Messages are accepted in any language and routed by the Legal team to the HR team when appropriate. There were **zero substantiated human-rights incidents** reported in 2024; consequently, no remediation was required. There is no formal response time target but these are addressed timely in line with the nature of the matter raised.

PRECAUTIONARY PRINCIPLE

Where scientific uncertainty exists, such as emerging climate-hazard projections or novel refrigerants, Global Switch **adopts the more conservative design or operational option**. Examples include applying a Climate Change Allowance to the currently documented ASHRAE extreme temperature conditions for each project site when sizing cooling infrastructure and specifying low-GWP refrigerants ahead of regulation. This precautionary stance is embedded in the Facility Design Policy and reflected in Capex gating.

CONTINUOUS-IMPROVEMENT LOOP

The DMA will be **refreshed annually**, synchronised with the corporate Risk assessment register review timetable and the KPI-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.



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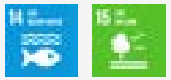
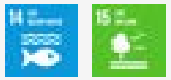
ESG TARGETS AND 2024 PROGRESS

	COMMITMENT / TARGET	REPORTING / MEASUREMENT METRICS	PROGRESS IN 2024	TARGET GOING FORWARD
Energy, Carbon & Renewables	**1.** Set a Science-Based Target (SBT) by end 2024 approved by the SBTi	**a.** SBTi-approved carbon reduction targets and plans to be in place by end 2024	Achieved (validated by SBTi-June 2025)	Scope 1 and 2: 42 % reduction by 2030 from a 2023 baseline Scope 3: 42 % reduction of Fuel-Energy-Related Activities (FERA) by 2030 -and 74 % of suppliers (by emissions) from a 2023 baseline in capital goods to set SBTs by 2029
	2. Purchase 100 % renewable electricity to cover Scope 2 emissions by 2030	**a.** % renewable electricity purchased and absolute renewable electricity (kWh)	In progress - 90.6 % (776 .67 GWh) renewables-backed electricity procured in 2024.	Purchase 100 % renewable electricity to cover Scope 2 emissions by 2030
	3. Measure and report energy and carbon emissions	**a.** Energy used (kWh/year); Scope 1, 2 and 3 verified emissions (tCO_2eq)	Reported in section E1 of the report.	Measure and report energy and 3rd party verified carbon emissions for Scope 1, 2 and 3 annually
	4. Design for new data centres with a maximum annualised PUE at full load of < 1.2 Europe, < 1.4 Asia Pacific exceeding the EU Climate Neutral Data Centre Pact	**a.** Set out in the brief for new developments **b.** Design PUE to be independently verified for each project	**a.** and **b.** Policy change achieved - this is included in project documentation for new developments and any redevelopment/lifecycle projects that will have a material efficiency Impact.	
	5. Redevelop existing data centres in cool climates to meet a PUE < 1.3 by 2030 in accordance with EU Climate Neutral Data Centre Pact	**a.** Set out in the brief for redevelopments **b.** Design PUE to be independently verified for each project	**a.** and **b.** Policy change achieved – as above.	
	6. Conduct a programme to replace fluorescent with LED lighting	**a.** % conversion to be reported year-on-year from 2024	HKG and SINW already at 100%. Progress varies at other facilities.	Develop LED upgrade plan by 2026, where needed.
	7. Adopt the use of biofuels in all new developments and phase out fossil fuels for standby generation by 2025	**a.** Set out in the brief for new developments **b.** % of existing sites converted to biofuels to be reported annually from 2024 **c.** Litres of biofuels used	**a.** Policy change achieved **b.** Conversion to biofuels has not commenced yet. **c.** As above.	Carry out feasibility for 100 % sustainable HVOs for standby generation by end 2026.

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	COMMITMENT / TARGET	REPORTING / MEASUREMENT METRICS	PROGRESS IN 2024	TARGET GOING FORWARD
	8. Adopt alternative comfort heating and cooling system e.g. heat pumps in new developments	Set out in the brief for new developments	Policy change achieved	
	9. Design-in heat export for new developments	**a.** Set out in the brief for new developments **b.** Report on KWh exported heat annually from 2024	**a.** Policy change achieved **b.** N/A as no heat was exported in 2024.	Report on KWh exported heat annually
	10. For new developments, conduct one of: LEED / BREEAM / Green Mark assessment (BREEAM Excellent; LEED Gold; Green Mark Platinum)	**a.** Report annually on the number of assessments completed and m^2 rated	No new developments completed in 2024.	Report annually on the number of assessments completed and m^2 rated
	11. For redevelopments/fit-outs in Europe, conduct a BREEAM Very Good assessment	**a.** Report annually on the number of assessments completed and m^2 rated	No redevelopments/fit-outs completed in 2024.	Report annually on the number of assessments completed and m^2 rated
	12. Incorporate Whole Life Carbon Assessment (WLCA) during design process for new developments	**a.** Set out in the brief for new developments **b.** Report on WLCAs completed annually from 2023	**a.** Policy change achieved **b.** Two assessments were undertaken for the two projects that were in design phase in year 2024.	
	13. For new developments, select refrigerant gases with a low Global Warming Potential (GWP) of less than < 750		Policy change achieved (Requirements < 100 GWP in the Facility Design Policy)	Develop high GWP F-Gases phase-out plan to align with relevant requirements.
	14. Avoid the use of SF_6 gas in switchgear	**a.** Set out in the brief for new developments	Policy change achieved	
Water	**15.** Introduce a water conservation policy and management to ISO 46001 (Water efficiency management systems)	**a.** Local management plan to be put in place in 2023.	Feasibility examined- water efficiency to remain within ISO14001 Environmental Management System rather than target ISO46001.	

ESG TARGETS AND 2024 PROGRESS

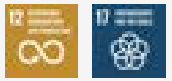
	COMMITMENT / TARGET	REPORTING / MEASUREMENT METRICS	PROGRESS IN 2024	TARGET GOING FORWARD
	16. Set WUE limits on new developments: < 0.75 European / < 1.0 Tropical climate by 2040		Achieved. We have set design WUE targets for our sites to meet the CNDCP targets, based on Climate, Water Stress and Water Type.	
	17. Consider other water sources (industrial, boreholes, rainwater)	**a.** Set out in the brief for new developments	Policy change achieved	Explore feasibility of alternative non potable water sources for existing facilities, where water evaporative cooling is used.
	18. Incorporate metering into the design for new developments (local plan by 2023)	**a.** Potable water withdrawn, used and discharged (m^3); % or amount saved	See metrics in the Water section of this report.	
Waste & Materials 	**19.** Zero waste to landfill by 2030	**a.** Waste by type and disposal method; % diverted from landfill (from 2024)	See metrics in the Waste section of this report.	Evolve process for improving accuracy of waste metrics.
	20. Incorporate recycled, low-carbon and low-water materials into our designs	**a.** % or amount of low carbon and low water materials used in new developments. To be reported from 2024.	Not recorded yet.	Develop process for monitoring materials target by 2026.
Biodiversity 	**21.** Introduce biodiversity strategy	**a.** Biodiversity strategy in place; m^2 enhanced;	In progress at site-level where deemed relevant.	
Pollution 	**22.** Maintain ISO 14001	Significant spills; water bodies affected	No spills recorded in 2024.	Maintain ISO 14001

ESG TARGETS AND 2024 PROGRESS

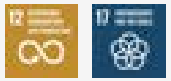
	COMMITMENT / TARGET	REPORTING / MEASUREMENT METRICS	PROGRESS IN 2024	TARGET GOING FORWARD
Health & Safety & Wellbeing 	**23.** Minimise Accidents	**a.** # of fatalities/high-consequence/recordable injuries and near misses	See metrics in Health & Wellbeing section.	Our aim is to achieve Zero Harm through the ongoing development of our certified systems, training of our people and thorough analysis leading to the elimination and reduction of Risk creating a safe environment.
	24. Maintain ISO 45001 for operations		Achieved	Maintain ISO 45001 for operations and expand to corporate office operations.
	25. Formalise our H&S and Wellbeing strategy		In progress. We are renewing our Global Total Reward strategy to ensure competitive and comprehensive benefits for our employees. Staff surveys show 96% value the Myndup mental health support app.	Formalise our H&S strategy by 2026 We will continue to leverage and embed the Myndup mental health support app.
	26. Develop labour and social dialogue policy	**a.** Working conditions and work benefits; social dialogue and collective bargaining reporting	Metrics reported in Social chapter of this report.	Formalise social dialogue policy by 2026
Learning & Development  	**27.** Implement our Learning and Development strategy		In progress	We will review and update our onboarding and induction processes to ensure a smooth transition for new joiners.
	28. Launch and deliver Leadership training for the senior leadership cohort		Achieved	We will provide training for hiring managers to improve recruitment processes and attract strong talent
	29. Introduce Thomas profiles to support the self -awareness and development of all Global Switch employees and develop career development plans		In progress	We are relaunching Thomas Assess to enhance our recruitment and talent management processes.

	COMMITMENT / TARGET	REPORTING / MEASUREMENT METRICS	PROGRESS IN 2024	TARGET GOING FORWARD
	30. Embed our utilisation of LinkedIn Learning across the business	**a.** Measure % of utilisation	-	We will connect our learning and development strategy to a consolidated learning channel, further embedding LinkedIn Learning.
	31. Employees completing self-evaluation	**a.** % of employees completing self-evaluation	Achieved- 100 % as part of Performance reviews	We will focus on the implementation of Performance, Talent, and Benefits modules, including competency frameworks and skill development.
	32. Improved metric on engagement survey on questions related to career development		Not Achieved	
	33. Improved metric on number of employees leaving Global Switch due to career progression.		Improvement achieved 40%	
	34. Launching 360 feedback for people managers		Not launched in 2024	
Diversity & Inclusion	**35.** Implement our D&I strategy	**a.** Diversity of all staff including leadership team and senior management.	Not launched in 2024; RESPECT Committee formed	We will continue to review our policies and handbook with a focus on family-friendly policies, including menopause, carers leave, neonatal loss, maternity, paternity leave, and the agile working guidelines.
	36. Implement our DEI action plan	**b.** Ratio of basic salary and remuneration of women to men	Not currently tracked.	We are introducing a neonatal care policy that provides paid leave for parents whose babies require neonatal care.

ESG TARGETS AND 2024 PROGRESS

	COMMITMENT / TARGET	REPORTING / MEASUREMENT METRICS	PROGRESS IN 2024	TARGET GOING FORWARD
	37. Improvement of the staff engagement survey metric linked to DEI		Improved metric not achieved	
	38. Global roll out of bias training		Completed in 2024 with ChickenShed	
Thriving Communities 	**39.** Develop community engagement strategy	**a.** Volunteering days allowance per employee	Not launched in 2024 but 2025 charity campaign agenda	We will organise team events that are aligned with charity campaigns to foster community engagement.
	40. Identification of a nominated charity per site to allocate any funds raised by site		In progress – Reported in chapter S3-Affected Communities	We will partner with a charity that supports veterans transitioning into work as part of our recruitment campaign.
	41. Improvement in the staff engagement survey metric linked to communities		Not launched in 2024 but 2025 charity campaign agenda	
Industry Collaboration 	**42.** Deliver customer engagement strategy, including green clauses in contracts	**a.** Approach to stakeholder engagement	PUE-linked green clauses piloted;	Formalise customer engagement strategy by 2026.
	43. Develop sustainable supply chain strategy	**a.** ESG criteria used in supplier selection	WIP	Develop sustainable supply chain strategy by 2027.
	44. Participation in industry bodies, and initiatives		Achieved	
Corporate Governance 	**45.** Deliver business Risk assessment, management and monitoring strategy		Achieved	
	46. Conduct climate Risk assessment of portfolio and adaptation strategy	**a.** Governance structure, composition and oversight **b.** Financial implications and other Risks/opportunities	**a.** Reported in section 1.4 of this report. **b.** Reported in section E1 of this report.	Climate Risk assessment every 2 years.

ESG TARGETS AND 2024 PROGRESS

	COMMITMENT / TARGET	REPORTING / MEASUREMENT METRICS	PROGRESS IN 2024	TARGET GOING FORWARD
Corporate Governance 	**47.** Deliver cybersecurity maturity programme and ISO27001 certification	**a.** CIS Maturity Framework score; Policies; Certifications (ISO 27001)	In progress.	Deliver cyber security programme and ISO27001 certification strategy by 2026
	48. Deliver business continuity strategy		In progress.	Further evolve business continuity strategy by 2026
	49. Deliver anti-bribery and corruption strategy	**a.** Business functions and operations assessed for corruption Risks **b.** Communication and training outcomes	**a.** Reported in G1-3	Business functions and operations assessed in more detail for corruption Risks by 2026
	50. Maintain ISO 9001 certification		Achieved	Maintain ISO 9001 certification
	51. Launch central data collection and reporting system for sustainability	**a.** Deliver GRI and TCFD-aligned reporting **b.** Participation in EcoVadis and CDP	**a.** and **b.** Achieved.	Continue evolving ESG data systems. Participation in EcoVadis and CDP annually
Human rights 	**52.** Uphold modern slavery statement.	**a.** Published modern slavery statement.	Achieved	Publish updated Modern Slavery Statement
	53. Deliver ethical supply chain strategy.	**a.** Risk assessments for operations and suppliers for incidents of forced or compulsory labour. **b.** Security personnel trained in human rights policies or procedures.	**a.** In progress- High level Risk assessment conducted for the Top 100 suppliers representing 86% of spent in 2024. **b.** Progress varies at facilities.	Risk assessments for operations and suppliers for incidents of forced or compulsory labour.

OVERVIEW OF SUSTAINABILITY-RELATED POLICIES

POLICY	DESCRIPTION OF KEY CONTENTS	SCOPE OF POLICY	ACCOUNTABLE FOR IMPLEMENTATION	INTERNATIONALLY RECOGNISED INSTRUMENTS / LEGAL FRAMEWORKS	AVAILABILITY
Adoption and Surrogacy Policy	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, HKSAR, NL, SG, ES. Dual language. French – English, German – English, Dutch – English, Spanish - English	HR Department	Local Employment Law, relevant ILO standards	Company intranet
Annual Leave Policy	Outlines employee annual leave entitlements, accrual methods, and usage guidelines in compliance with French labour laws. Presented in both French and English for clarity among local and international staff.	FR, UK, DE, HKSAR, NL, SG, ES. Dual language. French – English, German – English, Dutch – English, Spanish - English	HR Department	Local Employment Law, ILO Standards	Company intranet
Anti-Bribery and Corruption Policy	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, HKSAR, NL, SG, ES.	Compliance/Legal Departments, Board of Directors	OECD Guidelines, UN Global Compact, local anti-corruption laws	Company intranet
Anti-harassment Policy	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, HKSAR, NL, SG, ES.	Human Resources & Compliance/Legal Teams	ILO Conventions (e.g. No. 111)	Company intranet
Background Screening Policy	Establishes procedures and criteria for conducting background checks on employees and job candidates. Details screening processes, confidentiality measures, and compliance with local privacy and labour regulations.	FR, UK, DE, HKSAR, NL, SG, ES. Dual language. French - English, German – English, Dutch – English, Spanish – English	HR Department, Compliance Team	Local employment and privacy laws, best practice standards	Company intranet
Code of Conduct	Establishes ethical standards and expectations regarding behaviour, conflicts of interest, confidentiality, anti-bribery, and overall business conduct.	FR, UK, DE, HKSAR, NL, SG, ES.	Board of Directors	OECD Guidelines for Multinational Enterprises	Company intranet
Data Centre Cyber Security	Protects infrastructure against unauthorized 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, HKSAR, NL , SG, ES.	Data Protection Officer, IT Security Team & Legal Department	GDPR (Articles 33 & 34), NIST Cybersecurity Framework, ISO/IEC 27001	Company intranet

OVERVIEW OF SUSTAINABILITY-RELATED POLICIES

POLICY	DESCRIPTION OF KEY CONTENTS	SCOPE OF POLICY	ACCOUNTABLE FOR IMPLEMENTATION	INTERNATIONALLY RECOGNISED INSTRUMENTS / LEGAL FRAMEWORKS	AVAILABILITY
Data Privacy	Outlines principles and procedures for collecting, processing, storing, and sharing personal data. Ensures compliance with data protection regulations and safeguards the rights of data subjects.	FR, UK, DE, HKSAR, NL, SG, ES.	Data Protection Officer (DPO), IT & Legal Departments	GDPR, ISO/IEC 27701	Company intranet
Data Protection Impact Assessment Policy	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, HKSAR, NL, SG, ES.	Data Protection Officer, IT & Legal Departments	GDPR (Recital 91 & Article 35), ISO/IEC 27701	Company intranet
DOA Policy	Summarizes 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.	Central Human Resources Department (with Group Board oversight)	Internal Regulations	Company intranet
Equal Opportunities Policy	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, HKSAR, NL, SG, ES.	Chief Human Resources Officer	ILO Conventions (e.g. Equal Remuneration), local compliance	Company intranet
Facility Design Policy	Promotes energy-, water-, carbon-efficient data centre design.	Applies globally across all Global Switch operations.	Engineering Department	Local Regulations, EU Climate Neutral Data Centre Pact, ISO/IEC 30134-6., F-Gases Regulations	Company intranet
Flexible Working Policy	Provides guidelines for flexible working arrangements, including options for remote working, flexible hours, and adjustments to traditional working practices.	FR, UK, DE, HKSAR, NL, SG, ES. Dual language. French – English, German – English, Dutch – English, Spanish - English	HR Department	Local labour laws, EU directives on flexible working	Company intranet
General Data Protection Regulation (GDPR) Data Breach Policy	Outlines procedures for detecting, reporting, and mitigating data breaches. Specifies roles, notification timeframes (e.g. within 72 hours per GDPR), and communication protocols with regulators and affected individuals.	FR, UK, DE, HKSAR, NL, SG, ES.	Data Protection Officer, IT Security Team &Legal Department	GDPR (Articles 33 & 34), NIST Cybersecurity Framework, ISO/IEC 27001	Company intranet
General Data Protection Regulation (GDPR) Privacy Policy	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, HKSAR, NL, SG, ES.	Data Protection Officer & Legal Department	GDPR and local compliance	Company intranet

OVERVIEW OF SUSTAINABILITY-RELATED POLICIES

POLICY	DESCRIPTION OF KEY CONTENTS	SCOPE OF POLICY	ACCOUNTABLE FOR IMPLEMENTATION	INTERNATIONALLY RECOGNISED INSTRUMENTS / LEGAL FRAMEWORKS	AVAILABILITY
Gifts and Hospitality Policy	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, HKSAR, NL, SG, ES.	Compliance/Legal Departments, Procurement Team	OECD Guidelines, local corporate governance standards	Company intranet
Prevention of Slavery and Human Trafficking Statement	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	Central Human Resources Department (with Group Board oversight)	Modern Slavery Act 2015; aligned with international human rights standards	Global Switch website
Group Policy	Outlines core operational, ethical, and compliance standards. Applies across all locations and business units Serves as umbrella policy referencing subordinate policies. Supports audit readiness and regulatory compliance. Updated centrally and communicated to all employees.	FR, UK, DE, HKSAR, NL, SG, ES.	Human Resources		Company intranet
Health and Safety Policy	Establish guidelines for ensuring workplace safety, conducting Risk assessments, emergency preparedness, and promoting employee well-being.	FR, UK, DE, HKSAR, NL, SG, ES.	Health & Safety Officer, Facilities/Operations Manager	ISO 45001, ILO Occupational Safety and Health Conventions	Company intranet
Information Security Policy	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, HKSAR, NL, SG, ES.	Data Protection Officer, IT Security Team &Legal Department	GDPR (Articles 33 & 34), NIST Cybersecurity Framework, ISO/IEC 27001	Company intranet
IVF and Antenatal Policy	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, HKSAR, NL, SG, ES. Dual language. French – English, German – English, Dutch – English, Spanish - English	HR Department	Local employment regulations, best practice guidelines	Company intranet

OVERVIEW OF SUSTAINABILITY-RELATED POLICIES

POLICY	DESCRIPTION OF KEY CONTENTS	SCOPE OF POLICY	ACCOUNTABLE FOR IMPLEMENTATION	INTERNATIONALLY RECOGNISED INSTRUMENTS / LEGAL FRAMEWORKS	AVAILABILITY
Job Applicant Privacy Policy	Describes how personal data of job applicants is collected, processed, and safeguarded. Emphasises compliance with GDPR and local data protection guidelines.	FR, UK, DE, HKSAR, NL, SG, ES. Dual language. French – English, German – English, Dutch – English, Spanish - English	HR Department, Recruitment Team	GDPR, Local Data Protection Authority guidelines	Company intranet
Maternity Leave Policy	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, HKSAR, NL, SG, ES. Dual language. French – English, German – English, Dutch – English, Spanish - English	HR Department	Local Employment Law, EU maternity directives	Company intranet
Misuse of Drugs and Alcohol Policy	Outlines prohibited substance use, testing protocols, and support mechanisms for employees. Details consequences for violations and procedures for remediation.	FR, UK, DE, HKSAR, NL, SG, ES. Dual language. French – English, German – English, Dutch – English, Spanish - English	HR Department, Compliance Team	Local health and safety regulations, best practice standards	Company intranet
Paternity Leave Policy	Outlines eligibility, duration, and procedural guidelines for paternity leave. Ensures compliance with local employment laws.	FR, UK, DE, HKSAR, NL, SG, ES. Dual language. French – English, German – English, Dutch – English, Spanish - English	HR Department	Local Employment Law	Company intranet
Pensions Accounting Policy	Details the accounting treatment and disclosure requirements for pension schemes. Covers contributions, asset valuations, and compliance with financial reporting standards.	FR, UK, DE, HKSAR, NL, SG, ES.	Finance Department, HR Department	IFRS, local pension regulations	Company intranet
Physical Security Standard	Outlines standards for physical security across facilities, including access control, surveillance, and emergency protocols. Aims to protect assets, personnel, and data through robust physical security measures.	Applies to all Global Switch offices	Facilities/Security Manager, IT Security Team	ISO/IEC 27001, local security regulations	Company intranet

OVERVIEW OF SUSTAINABILITY-RELATED POLICIES

POLICY	DESCRIPTION OF KEY CONTENTS	SCOPE OF POLICY	ACCOUNTABLE FOR IMPLEMENTATION	INTERNATIONALLY RECOGNISED INSTRUMENTS / LEGAL FRAMEWORKS	AVAILABILITY
Privacy Policy – for Processing Employee's Personal Data	Details specific measures and guidelines for handling, processing, and safeguarding employees' personal data, including payroll, performance records, and sensitive information.	FR, UK, DE, HKSAR, NL, SG, ES.	Human Resources & Data Protection Officer	GDPR, Local Data Protection Regulations	Company intranet
Privacy Policy for Site Visitors and Business Contacts	Details the collection, use, and protection of personal data for site visitors and business contacts. Provides transparency and compliance with applicable data protection laws.	Applies to Global Switch offices	Data Protection Officer, Marketing/IT	GDPR, local data protection laws	Company intranet
Procurement Management Policy	Defines the best practice of conducting procurement within the business to minimise Risk and ensure compliance.	FR, UK, DE, HKSAR, NL, SG, ES.	Procurement Department	Local Laws	Company intranet
Quality Management Policy	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 review business aspects to identify improvement opportunities. Maintains a resilient and secure operational environment through quality systems.	FR, UK, DE, HKSAR, NL, SG, ES.	Quality Assurance Manager & Operations Department	ISO 9001	Company intranet
Security Policy	Covers physical and cybersecurity measures, including access controls, threat monitoring, incident response, and regular security audits to protect company assets and data.	FR, UK, DE, HKSAR, NL, SG, ES.	IT Security Team & Facilities/ Security Manager	ISO/IEC 27001, NIST Cybersecurity Framework	Company intranet
Social Media Policy	Provides guidelines for the professional and responsible use of social media by employees. Covers confidentiality, reputation management, and compliance with corporate communication standards.	FR, UK, DE, HKSAR, NL, SG, ES. Dual language. French – English, German – English, Dutch – English, Spanish - English	Marketing/Communications, HR Department	Corporate communications standards	Company intranet

OVERVIEW OF SUSTAINABILITY-RELATED POLICIES

POLICY	DESCRIPTION OF KEY CONTENTS	SCOPE OF POLICY	ACCOUNTABLE FOR IMPLEMENTATION	INTERNATIONALLY RECOGNISED INSTRUMENTS / LEGAL FRAMEWORKS	AVAILABILITY
Supplier Code of Conduct	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 recognized 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.	Applies globally across all Global Switch operations and supply chain partners	Legal team, Procurement Team	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.	Company intranet
Sustainability Policy	Outlines Global Switch's commitment to environmental and social sustainability. Covers initiatives for reducing environmental Impact, promoting resource efficiency, and reporting on sustainability performance.	FR, UK, DE, HKSAR, NL, SG, ES.	Sustainability/ESG Team, Senior Management	Global Reporting Initiative (GRI),	Company intranet
Whistleblower Policy	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.	FR, UK, DE, HKSAR, NL, SG, ES.	Compliance Department, Board of Directors, Audit Committee	EU Whistleblowing Directive, Local Laws	Company intranet
Workforce Privacy Policy	Outlines guidelines for processing and safeguarding personal data of employees in the Netherlands, ensuring transparency and compliance with applicable regulations.	Applies to all Global Switch offices	HR Department, Data Protection Officer	GDPR, Local employment law	Company intranet

ABOUT THIS REPORT - BASIS FOR PREPARATION

(ESRS 1 BP-1, BP-2, GRI 2-1 → 2-5)

REPORTING SCOPE AND PERIOD

This Sustainability Report is annual and covers the financial year 1 January – 31 December 2024.

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.

CONSOLIDATION BOUNDARY

Unless otherwise stated, data relate to assets under Global Switch Group's operational control, comprising data-centre campuses and corporate offices in Amsterdam, Frankfurt, Hong Kong, London, Madrid, Paris and Singapore. The Group's former economic interest in Australia, divested in 2024, is excluded because the Group lacked operational control and policy authority over that entity.

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 residual emissions from customers' ICT equipment.





COMPARABILITY WITH PRIOR REPORTING

There are no structural changes, methodology shifts or restatements relative to the 2023 report.

ESTIMATION TECHNIQUES AND UNCERTAINTY

Where primary data were 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

(ESRS 2 DR 2-16, ESRS 2 GOV-5, ESRS G1-1)

In Q1 and Q2 2025, Global Switch engaged independent assurance specialists to conduct a limited assurance engagement over our 2024 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 2024 Scope 1, 2 and 3 greenhouse-gas emissions data are materially misstated.

Fieldwork was completed in Q1 2025, with final assurance opinions issued in Q2 2025. Assurance statements appear in **Appendices - Verification Statements**.

REPORTING FRAMEWORKS APPLIED

The primary basis of preparation is the EU Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) which Global Switch has voluntarily adopted for Financial Year 2024. Cross-references to GRI Standards 2021 and SASB Data Centre and/or Real Estate Services standard metrics are provided solely to aid stakeholders who use those frameworks.

CONTACT POINT

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

General Disclosures
Environmental
Social
Governance
Appendices

ENVIRONMENTAL

ENVIRONMENTAL

E1-CLIMATE CHANGE

As a leading data centre provider, Global Switch understands the need to reduce the environmental Impact of our operations. With the growing demand for data processing and storage, energy consumption is rising, making it more important than ever to transition to renewable energy and improve efficiency.

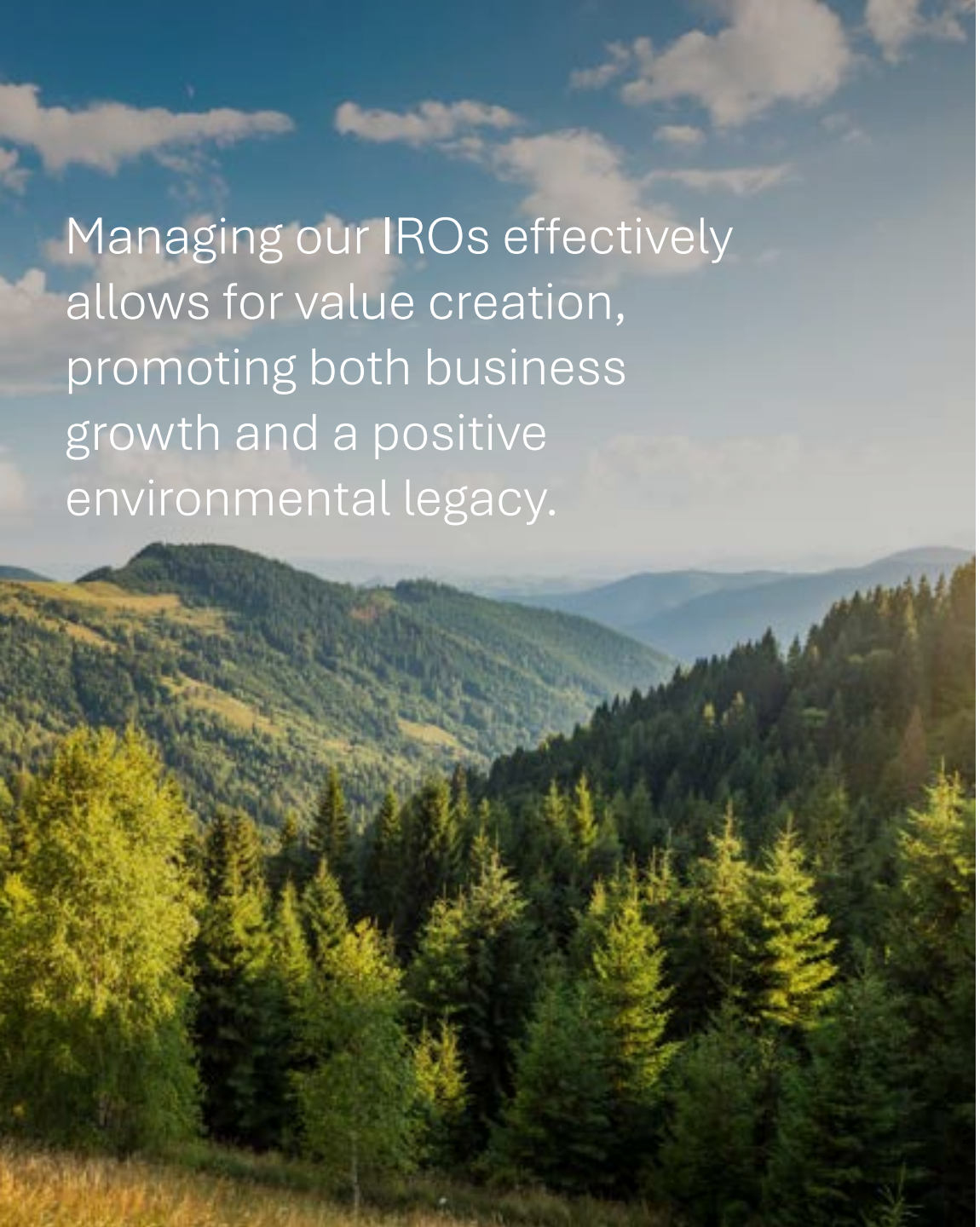
Taking action on climate change is essential for us. We are committed to using energy responsibly and cutting emissions wherever possible. We also want to meet the expectations of our customers, investors, and partners by aligning with their sustainability goals. Most importantly, we recognise that our data centres play a key role in helping our clients reduce their own carbon footprint by offering energy-efficient, low-carbon solutions.





E1-Climate Change

SUBTOPIC	IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN	TIME HORIZON	MAPPED DISCLOSURE
Climate change mitigation	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).	**Actual Negative Impact**	Upstream / Own Ops / Downstream	Short / Medium / Long	E1-6, E1-1, E1-4
Energy use (grid support)	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.	**Potential Positive Impact**	Downstream	Medium / Long	E1-1, E1-3
Climate adaptation	Global Switch faces operational and infrastructure Risks due to climate change, including: • Need for early replacement of cooling infrastructure (extreme heat) • Increased cooling demand and energy dependency • Water stress Impacting cooling system efficiency • Ground instability due to drought • Workforce health and safety Risks (heat stress, weather events) • Supplier disruption due to climate vulnerabilities	**Risk**	Own Ops / Upstream	Medium / Long	E1-1, E1-2, E1-3, E1-4
Climate adaptation	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.	**Risk**	Own Ops / Upstream	Medium / Long	E1-2, E1-4, E1-1
Energy efficiency	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.	**Risk**	Own Ops / Upstream	Short / Medium / Long	E1-1, E1-5, E1-2



Managing our IROs effectively allows for value creation, promoting both business growth and a positive environmental legacy.

These sustainability matters may also result in adverse effects on nature, ecosystems, or our climate, contributing to intensified climate change. However, not all Impacts are detrimental. There is potential for positive outcomes as well. By seizing opportunities linked to sustainability, we can drive innovation, enhance resource efficiency, and assist local communities in case of power disruption. All of the above could lead to improved financial performance, market differentiation, and regulatory compliance. Managing our IROs effectively allows for value creation, promoting both business growth and a positive environmental legacy.

The process of identifying the IROs relevant to our business, followed the principles of our DMA, in line with ESRS E1 disclosure requirements. A combination of internal dialogue across key business functions and supplemented by external environmental expertise was used, applying analytical tools to map potential IROs across the entire value chain, covering upstream, own operations, and downstream activities, and across short-, medium-, and long-term horizons.



Our assessment considered both physical and transitional climate change dimensions, as well as associated energy use issues. We evaluated a wide set of 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, climate-related Impacts on physical infrastructure and workforce safety, and transitional Risks related to the cost of decarbonising data centres and adapting supply chains.

While the scope of identified IROs is broader than in previous years, we continue to assess our overall exposure as moderate. No systemic or transformative Risks to our business model have been identified at this stage. However, we will continue to refine our analysis and may expand our use of forward-looking scenario techniques to enhance our understanding of future climate-related developments and how they may influence our operations and strategy.

E1.SBM-3, E1.IRO-1, E1-9 – CLIMATE IROs, STRATEGY, RESILIENCE AND FINANCIAL EFFECT IN BUSINESS MODEL
(SBM-3, E1.IRO-1, E1-9, GRI 201-2; SASB IF-EU-450a.2)

CLIMATE RESILIENCE METHODOLOGY AND RISK IDENTIFICATION

Global Switch has undertaken a climate Risk and resilience assessment aligned with the requirements of ESRS E1 and informed by the principles of double materiality. Recognising the distinct, forward-looking nature of climate-related Risks, the assessment followed a four-step methodology designed to ensure the identification of material physical and transition Risks across the full asset base and operational value chain.

STEP 01

Framing via TCFD Risk Categories

STEP 02

Climanomics Modelling Insights

STEP 03

Business-Specific Review and Refinement

STEP 04

Climate Risk Register Alignment

01 Framing via TCFD Risk Categories

The assessment began by adopting the TCFD's structure, which categorises Risks into physical (acute and chronic) and transition (policy, legal, market, technology, and reputation) dimensions. This framework ensured comprehensive coverage and established a common Risk taxonomy.

Hazards Assessed

Table 1:
Climate Hazards Assessed (Physical and Transition)

HAZARD TYPE	HAZARD
Physical – Acute	Pluvial flooding
	Fluvial flooding
	Coastal flooding
	Tropical cyclones
	Wildfire
Physical – Chronic	Temperature extremes
	Drought
	Water stress
	Landslides
Transition	Policy & regulatory change
	Legal (climate litigation)
	Market dynamics
	Technology disruption
	Reputational Risks

02 Climanomics Modelling Insights

The Climanomics platform was used to model climate Risk exposure across Global Switch's global data centre portfolio. This tool draws from authoritative datasets (e.g. Aqueduct water stress index, World Resources Institute flooding indices, temperature and precipitation trends) and projects Risk Impacts across physical and transitional categories under defined scenarios:

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 hazards were assessed for two decadal timeframes:

2020–2029
Short and Medium Term

2030–2039
Long Term

The results were directional rather than definitive, as often Climanomics uses datasets developed for residential and commercial building archetypes, not data centres, where there is lack of such published data. These results were treated conservatively and supplemented by business knowledge where gaps were identified.

03 Business-Specific Review and Refinement

Operational leaders, engineering staff, and the Group ESG Consultant reviewed the Climanomics outputs against Global Switch's operational characteristics. For instance:

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.

Insights from operational management and climate experts were used to adapt the modelled data to Global Switch's business realities:

- 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.
- Internal materiality threshold of £115 million (applied either at portfolio or individual asset level) was used to determine financial relevance.

This step ensured relevance, practical grounding, and alignment with Global Switch's Risk management systems.

04 Climate Risk Register Alignment

Finally, the results were compared against Global Switch's legacy Climate Risk Register. Outdated Risks were removed and overlapping entries rationalised. This ensured the final list used in the Financial Assessment Matrix was complete, up-to-date, and reflected actual enterprise exposure.

Material Climate Risks & Opportunities, Potential Financial Effects and Resilience Integration with the Business Strategy

Global Switch identified three climate hazards as enterprise-level Risks across all time horizons. The table below details the Risk, potential financial effects and materiality, affected locations, adaptive strategy for Risk mitigation and implementation status.

Table 2: Material Climate-Related Risks, potential financial effects and adaptation/ resilience strategy

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Table 2: Material Climate-Related Risks, potential financial effects and adaptation/resilience strategy

RISK CATEGORY	CLIMATE RELATED RISKS AND POTENTIAL FINANCIAL EFFECTS	POTENTIAL FINANCIAL EFFECTS MATERIALITY (E1-9)	POTENTIALLY IMPACTED SITES (WITHOUT MITIGATION)	ADAPTATION STRATEGY FOR RISK MITIGATION AND RESILIENCE	IMPLEMENTATION STATUS
Temperature Extremes	Increased cooling loads, HVAC degradation, workforce productivity loss due to heat stress	Above £115m threshold (Group-level)	All data centres	Adoption of next-generation cooling technologies (e.g. liquid cooling, adiabatic systems); enhanced HVAC maintenance schedules; building insulation upgrades	In place across London and Frankfurt; planned for Paris and Madrid
Water Stress	Operational disruption from freshwater scarcity; elevated municipal water charges	Enterprise-level material	Frankfurt, London, Madrid, Paris, Singapore	Roll-out of water-efficient cooling systems, WUE targets, site-level water Risk monitoring	Deployed in Amsterdam and Hong Kong; expansion planned in Madrid
Drought	Soil desiccation leading to structural Risk and potential building subsidence	Potential high Risk in London per Climanomics and Paris – to be investigated	London, Paris	Design review of foundations	To be rolled out
Workforce Health & Safety	Occupational Risks (heat stress, extreme weather) affecting operations and business continuity	Material 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
Supplier Disruption	Equipment, infrastructure or construction delays due to climate-Impacted suppliers	Indirect but high-Risk via project delays	Global supply chain exposure (not site-specific)	Supplier ESG screening and requirements for science-based targets; diversification of vendor base, if necessary	Ongoing updates through ESG procurement policy
Energy Dependency/ Energy Efficiency 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	Enterprise-level operational Risk	All data centres	Increased use of renewable electricity via PPAs; on-site energy storage and backup systems; operational PUE targets	Active in all regions; monitored through ESG Steering Group
Climate Transition Costs	Capital investment pressure for renewable transitions, retrofits, fuel-switching, and technology shifts	Potential margin Impact depending on project 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	Rolled out for new designs and major renovations through the Facility Design Policy
Upskilling / Reskilling	Operational complexity and potential inefficiencies during technology transition periods	Emerging – subject to investment phasing	Operations and facilities teams globally	Career reviews and training provisions	Active in all regions;

Climate-Related Financial Opportunities
(ESRS E1.IRO-1; GRI 201-2; SASB IF-EU-110a.2)

As part of Global Switch's double materiality assessment and climate resilience analysis, the company evaluated both climate-related Risks and opportunities using a structured methodology that integrated TCFD principles, Climanomics modelling, and expert operational review.

While the process considered a wide range of potential positive Impacts, including energy efficiency gains, emerging green technology applications, and regulatory incentives, no material financial opportunities were identified that met Global Switch's internal threshold of £115 million (either at asset or enterprise level) or warranted specific tracking in the company's Risk register at this time.

This conclusion reflects the current maturity of climate-related market incentives in the colocation data centre sector. Nevertheless, Global Switch continues to monitor evolving policy and technology developments that may, in future, give rise to new financial opportunities aligned with its decarbonisation strategy.

CLIMATE RESILIENCE STRATEGY AND BUSINESS INTEGRATION

Global Switch's resilience strategy adopts a portfolio-level treatment of Risks, with consistent Risk mitigation standards applied across all facilities regardless of geography. This precautionary approach ensures that localised vulnerabilities do not escalate into systemic disruptions.

Key forward-looking measures include:

Resilience screening embedded in Capex planning

All major retrofit and new build projects to undergo climate Risk screening before final approval. This applies also to MEP (mechanical, electrical, plumbing) infrastructure design.

Redundant system design

N+1 or greater system configurations are used to mitigate operational Risk from HVAC degradation during heatwaves or water disruptions.

Back-up resilience assets

Where water Risk is high, dual-source water supply and on-site storage (e.g. London, Paris) are included in business continuity plans.

Risk-adjusted investment prioritisation

Sites with the highest exposure are now prioritised in climate-related capital investment allocation, with the ESG team inputting directly into investment committee reviews.



CLIMATE-RELATED FINANCIAL OPPORTUNITIES

The resilience analysis is formally reviewed as part of Global Switch's broader Risk governance cycle, with results presented to the COO, the Executive Committee and the Board.
The scenario assumptions, SSP1–2.6 and SSP2–4.5, are consistent with the company'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 the company's assets.

Ongoing use of scenario analysis tools and stakeholder engagement (including engineering teams, finance, ESG, and operations) 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).

E1-1 TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION
(AR 1–AR 5, ESRS 2 SBM-3; GRI 201-2)

TRANSITION PLAN OVERVIEW

Global Switch has adopted a transition plan aimed at aligning its business strategy 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.

This plan is underpinned by a 2030 science-based target (SBT) to achieve a **42% absolute reduction in Scope 1, Scope 2 (market-based), and Scope 3 fuel- and energy-related activities) emissions** from a 2023 baseline. In parallel, Global Switch has committed that **74% of capital goods suppliers by emissions** will have SBTs in place by 2029.

The company has also committed to achieving **100% renewable electricity use across its portfolio by 2030**, delivered through a combination of green power purchase agreements (PPAs), renewable energy certificates (RECs), and onsite renewable integration, though this target is not submitted as a standalone SBT.

These targets are supported by a range of additional operational and procurement actions, including:

- The **phase-out of high-GWP refrigerants** in alignment with EU F-Gas Regulation timelines
- The adoption of **Whole Life Carbon Assessments** at the design stage of new developments
- The implementation of **carbon and energy management systems**, including ISO 14001 and ISO 50001
- A growing integration of **climate mitigation actions into capital investment planning**, with internal governance by the ESG Steering Group

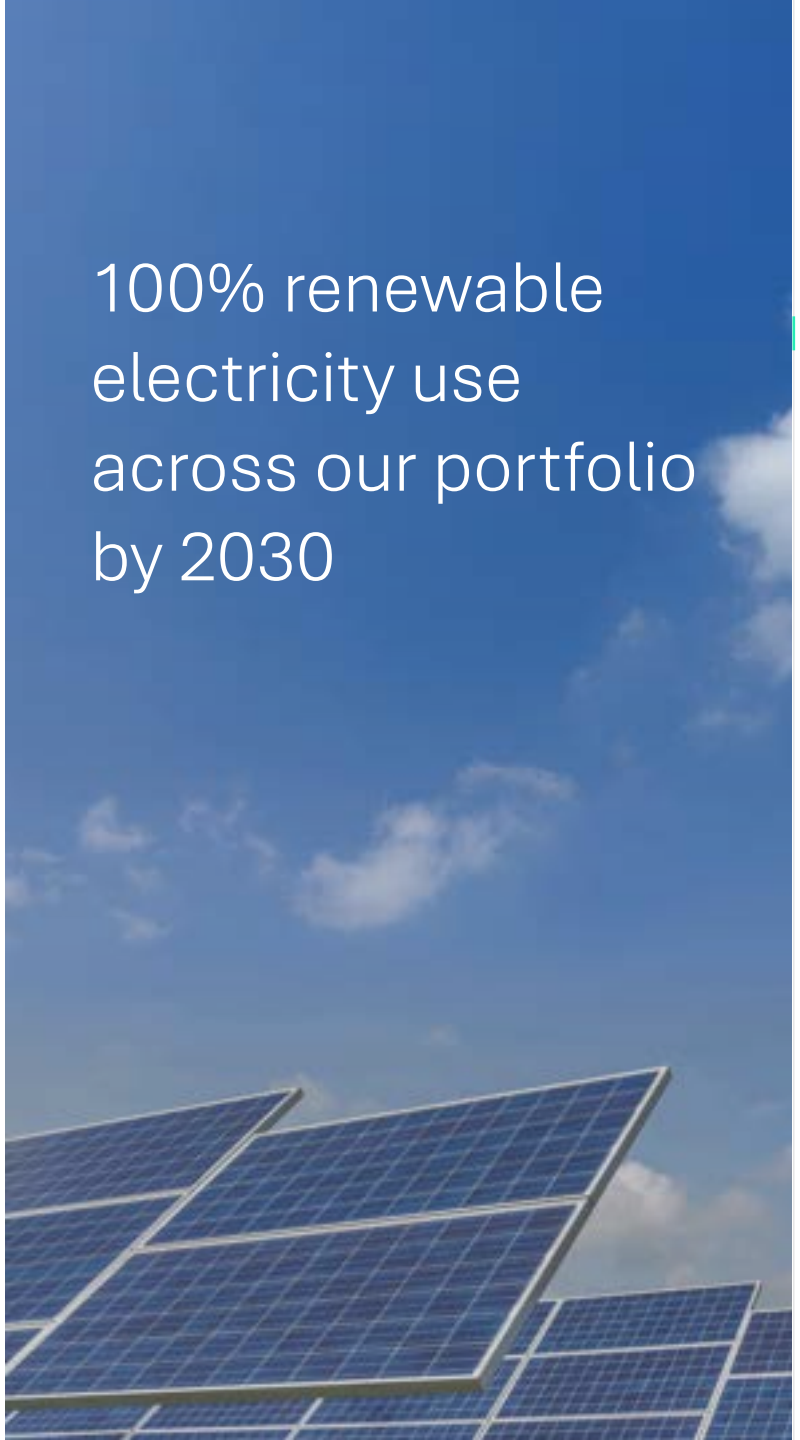
All emissions targets have been set using the GHG Protocol Corporate Standard, and progress is tracked using operational GHG monitoring systems aligned with ESRS E1 and CSRD assurance requirements.

Compatibility with 1.5°C Pathway
The company's 2030 target was calculated to be aligned with a 1.5°C pathway for a 10-year reduction horizon, as per SBTi guidance and validation by SBTi was achieved in June 2025 confirms that the target meets the minimum ambition level for scope coverage and reduction rates. Consistency between GHG inventory boundaries and target boundaries has been ensured through cross-referencing with the company's consolidated emissions data platform.

Business Integration and Financial Alignment
The transition plan is embedded in Global Switch's strategic planning and financial oversight cycles. It is overseen by the ESG Steering Group and forms part of project planning reviews and investment decision reviews. Capex allocations are now increasingly including climate change considerations with strategic upgrades (e.g. HVAC replacement, purchase of renewable electricity, refrigerant transitions) and Global Switch plans to work to embed such considerations further into the business financial planning.

Locked-In Emissions and EU Taxonomy
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. Alignment with the EU Taxonomy (Commission Delegated Regulation 2021/2139) is under review for future disclosures on capex and opex contributions and taking into account the EU Omnibus simplification changes in disclosure requirements.

Disclosure Cross-Reference
A detailed breakdown of climate-related **policies, actions, and targets**, including those underpinning this transition plan, is presented in the consolidated table that follows, covering ESRS E1-2 to E1-4.



E1-2, E1-3 AND E1-4 CLIMATE POLICIES, ACTIONS AND TARGETS
(ESRS E1-2, E1-3 and E1-4; GRI 302, 305, 306; SASB IF-EU-110a.3)

Global Switch has adopted a structured approach to climate change mitigation, adaptation, and energy performance.

The table below provides a consolidated overview of relevant policies (E1-2), actions and allocated resources (E1-3), and climate-related targets (E1-4 and E1-9), grouped by material Impacts, Risks, and opportunities (IROs). These include both existing and planned measures across the value chain and are aligned with internal governance structures and external standards, such as 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 table includes the time horizons, KPIs, and monitoring mechanisms for all disclosed targets, alongside their link to the company's transition plan (E1-1) and Risk management approach (E1-3).
Where policies or actions are still under development, this is clearly stated.

The company has adopted formal climate-related targets, including energy efficiency (PUE), renewable electricity procurement, refrigerant transition, embodied carbon reduction, water and waste management, and Scope 3 supplier engagement with science-based targets.
These measures form an integral part of Global Switch's decarbonisation strategy and climate resilience roadmap.

Consolidated Table: Climate-Related Policies, Actions & Targets

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 (fuel & energy losses) emissions by 2030	By 2030 from a 2023 baseline	In progress	tCO_2e	Dedicated ESG & operations teams; Capex allocation; GHG monitoring systems	ESG Transition Plan; GHG Monitoring System	SBTi	E1-2, E1-3, E1-4
	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	% supplier emissions	Procurement capacity-building; supplier engagement programme	Supplier engagement programme; Procurement planning	SBTi	E1-2, E1-3, E1-4
	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; energy team oversight; financial planning	ESG Steering Group oversight	ISO 14001, EU Energy Efficiency Directive (EED)	E1-2, E1-3, E1-4
	All new developments and major redevelopments must use refrigerants with a GWP < 100, as mandated by the Facility Design Policy.	Ongoing	Implemented (new builds); under evaluation (existing systems)	CO_2e / kg leakage	Engineering standards; approved refrigerant lists	Facility Design Policy	EU F-Gas Regulation (517/2014); 2024 amendments	E1-2, E1-3
	Existing systems using high-GWP refrigerants (GWP ≥ 2,500) will 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	Asset review; refrigerant inventory tracking	Maintenance & Asset Planning (under revision)	EU F-Gas Regulation (517/2014); 2024 amendments	E1-2, E1-3
	Whole Life Carbon Assessments (WLCAs) required at design stage to identify and reduce embodied carbon	Ongoing	Implemented (new builds)	Embodied CO_2e per design	Engineering design tools; internal design team	Facility Design Policy	Circular economy design principles	E1-2, E1-3
	100% diversion from landfill of all waste types (construction, operations, maintenance, end-of-life) by 2030	2024–2030	Target adopted	% total waste diverted	Waste management teams; supplier contracts; infrastructure investment	Waste and Circularity Roadmap-to be developed by 2028	ESRS E5; Scope 3 GHG mitigation	E1-2, E1-3, E1-4

Consolidated Table: Climate-Related Policies, Actions & Targets

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI	RESOURCE ALLOCATION	INTERNAL POLICY / GOVERNANCE	EXTERNAL FRAMEWORK / STANDARD	DISCLOSURE REF.
	Provision for waste heat recovery to be included in all new data centre designs	From 2023	Standard practice	% facilities designed with recovery systems	Engineering teams; integration in systems, financial planning	Facility Design Policy	EU Circular Economy Action Plan (aligned)	E1-2, E1-3
	ISO 14001 Environmental Management System implemented across all sites	Operational	Implemented	Certification	Environmental compliance team; third-party auditors	ESG management system	ISO 14001	E1-2, E1-3
	Operational GHG Monitoring System in place for Scope 1, 2 and 3	Operational	Implemented	Emissions completeness, frequency	GHG data platform; ESG data managers	ESG management system	Supports ESRS assurance	E1-2, E1-3
Climate adaptation	Climate change Risk assessments for facility sites and business operations (physical and transitional Risks)	Ongoing	Implemented (partial)	% sites with assessed Risks	Engineering teams; integration in systems, financial planning	Facility Design Policy	TCFD, Climanomics modelling tool screening methodology	E1-2, E1-3
	Prioritisation of industrial and non-potable water for cooling to reduce reliance on freshwater sources	Ongoing	In place	Site-level WUE	Site infrastructure upgrades; water sourcing contracts	Facility Design Policy	EED, Climate Neutral Data Centre Pact (CNDCP)	E1-2, E1-3, E1-4
	Water Usage Effectiveness (WUE) targets in place at site level;	2023–2030	Ongoing	WUE (L/kWh)	Facilities management systems; water efficiency audits	Facility Design Policy	CNDCP, EED	E1-2, E1-3, E1-4
	Cooling technology innovation (liquid cooling, closed-loop, adiabatic systems) piloted in new developments	From 2023	In pilot phase	WUE performance per site	Capex investment; R&D and pilot procurement	Facility Design Policy Engineering Innovation Tracker	Best available technologies (BAT)	E1-2, E1-3
	Heat Risk preparedness protocols in place for workforce, including ISO 45001 alignment and climate contingency planning	Ongoing	Implemented	H&S incidents; heat alerts	H&S teams; ISO 45001 training	ISO 45001, H&S policies, Supplier Code of Conduct	ISO 45001	E1-3

Consolidated Table: Climate-Related Policies, Actions & Targets

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI	RESOURCE ALLOCATION	INTERNAL POLICY / GOVERNANCE	EXTERNAL FRAMEWORK / STANDARD	DISCLOSURE REF.
Climate transition costs	Decarbonisation actions integrated into lifecycle Capex and developments' financial planning to mitigate transition cost Risks (e.g. Renewables procurement)	Ongoing	Integrated	% Capex aligned to decarbonisation	Cost analysis by Site and Procurement teams	Business Plan	SBTi implementation criteria	E1-3
Energy efficiency	Target for new data centres to meet maximum annualised PUE at full load of <1.2 (Europe), <1.4 (APAC), exceeding CNDCP requirements	Ongoing	Design policy	PUE (design stage)	Infrastructure design and site monitoring	Facility Design Policy	EU CNDCP; EU Code of Conduct for Energy Efficiency	E1-2, E1-3, E1-4
	Redevelopment target: existing data centres in cool climates to achieve PUE <1.3 by 2030	2023–2030	Target adopted	Operational PUE	PUE upgrades modelling, Retrofit Capex; facilities engineering	Facility Design Policy	EU CNDCP	E1-2, E1-3, E1-4
	ISO 50001 Energy Management System implemented across all sites	Operational	Implemented	Site energy intensity; audits	Site teams and external auditors	Energy management system	ISO 50001	E1-2, E1-3
	Certify all facilities to the EU Code of Conduct for Energy Efficiency in Data Centres	Operational	All data centres were certified in 2024/ early 2025	Site energy intensity; audits	Site teams and external auditors	Energy management system	EU Code of Conduct for Energy Efficiency in Data Centres	E1-2, E1-3
	All new data centres must achieve minimum LEED Gold, BREEAM Excellent or local equivalent certification	Ongoing	Design requirement	% certified buildings	Green building experts; certification consultants	Facility Design Policy	Green Building Council standards, CNDCP	E1-2, E1-3
	All major renovations and fit-outs must achieve BREEAM Very Good or local equivalent	Ongoing	Mandatory requirement	% redevelopments certified	Retrofit teams; local cert planning	Facility Design Policy	BREEAM or local equivalent	E1-2, E1-3

E1-5 ENERGY CONSUMPTION, PUE AND METERING
(ESRS E1-5; GRI 302-1, 302-3; SASB IF-EU-130a.1, SASB IF-RE-130a.4)

Global Switch has made substantial progress in reducing its reliance on non-renewable energy, achieving an 89.6% renewable energy share and 90.6% renewable electricity share in 2024.

Total energy consumption has grown by 13.7% since 2021 in line with business expansion and demand increases, but the share of non-renewable energy has declined from 39.0% in 2021 to just 10.4% in 2024 demonstrating significant purchase of renewables-backed electricity in the Group's energy sourcing strategy.

Energy Consumption (GWh)

ENERGY TYPE	2024	2023	2022	2021
Fuel (natural gas, diesel)	9.2	6.14	9	12
Purchased non-renewable electricity	80.9	68.7	56.3	280.1
Total non-renewable	90.1	74.84	65.1	291.7
% of total	10.40%	9.40%	8.00%	39.00%
Purchased renewable electricity	776.7	717.1	737.1	447.7
% of total	89.60%	92.00%	92.00%	61.00%
Total energy consumption	**866.8**	**791.7**	**813.2**	**747.9**

Energy Intensity Metrics

METRIC	2024
Energy consumption per £ million revenue (GWh/£m)	1.985
Basis of calculation	Consolidated net revenue for the reporting period

Power Usage Effectiveness (PUE)

PUE is tracked to assess operational energy efficiency. In 2024, the group-wide average PUE improved to 1.66, supported by infrastructure and cooling upgrades, particularly in Europe.

REGION	2024	2023	2022
Group Average	1.66	1.72	1.75
Europe (EMEA)	1.76	1.83	1.87
Asia Pacific (APAC)	1.56	1.56	1.62

POWER USAGE EFFECTIVENESS (PUE)

In recent development projects, our operational PUE has demonstrated performance better than our declared targets:

REGION / GROUP	TARGET	ANNUALISED OPERATIONAL PERFORMANCE FOR 2024
EMEA	<1.2	FRAN: 1.17
APAC	<1.4	SINW: 1.37

Additionally, some of our mature data centres have achieved notable year-on-year performance improvements as part of our investment and innovation programmes:

REGION /GROUP	IMPROVEMENT 2024 VS 2023
EMEA	PARW: 6.1%
APAC	HKG: 16.5%

Global Switch continues to prioritise site-level efficiency improvements, with PUE targets embedded in the Facility Design Policy.

All campuses 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.

Customer Submetering

In support of energy transparency, customer accountability, and Scope 2 emissions management, Global Switch implements submetering and separate metering across its data centre portfolio.

As of 31 December 2024:

- 100% of customers at our Paris, Madrid, Singapore Woodlands, and Hong Kong campuses are separately metered or submetered for grid electricity use.
- At other locations (London, Frankfurt, Amsterdam, Singapore Tai Seng), submetering is partially implemented.
- 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 gigawatt-hours was performed using the UK Government's **Defra 2024 Fuel Conversion Factors**. Only purchased electricity is included; there is no on-site generation currently in operation. All energy values are reported in GWh for consistency and alignment with GRI and ESRS formats.
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.

E1-6 GHG EMISSIONS

(Covers ESRS E1-6; GRI 305-1, 305-2, 305-3, 305-4; SASB IF-EU-110a.1)

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	CATEGORY	EMISSION SOURCE	2023 (tCO_2e) LOCATION-BASED	2023 (tCO_2e) MARKET-BASED	2024 (tCO_2e) LOCATION-BASED	2024 (tCO_2e) MARKET-BASED	% CHANGE LOCATION-BASED	% CHANGE MARKET-BASED
Scope 1	–	Stationary combustion	1,444.00	1,444	2,441	2,441	69%	
Scope 1	–	Company vehicles	0	-	0	0	–	
Scope 1	–	Fugitive emissions	0	-	0	0	–	
Scope 1	–	Refrigerants	3,036	3,036	1,141	1,141	– 62%	
Scope 2	-	Electricity usage	282,082	44,053	264,512	51,868	-6%	18%
Scope 2	–	Heating	0		0		–	
Scope 2	–	Cooling	0		0		–	
Scope 3	Cat. 1	Purchased goods and services	11,102	11,102	11,639	11,639	5%	
Scope 3	Cat. 2	Capital goods	42,755	42,755	57,875	57,875	35%	
Scope 3	Cat. 3	Fuel and energy-related activities	119,293	16,151	82,028	32,866	-31%	104%
Scope 3	Cat. 4	Upstream transportation and distribution	0	0	0	0	–	
Scope 3	Cat. 5	Waste generated in operations	6.3	6.3	7.6	7.6	27%	
Scope 3	Cat. 6	Business travel	351	351	756	756	115%	
Scope 3	Cat. 7	Employee commuting	252	252	290	290	15%	
Scope 3	Cat. 8	Upstream leased assets	0	0	1.2	1.2	–	
Scope 3	Cat. 13	Downstream leased assets	8.6	8.6	102	89	1081%	
Total Scope 3 (market-based)				70,626		103,523		47%
Total Scope 3 (location-based)			173,768		152,699		-12%	
Total (market-based)				**119,159**		**158,974**		**33%**
Total (location-based)			**460,330**		**420,793**		**-9%**	

GHG Intensity

METRIC	2023	2024
Total GHG emissions (location-based) in t CO2e per £m revenue	826	964
Total GHG emissions (market-based) per £m revenue	214	364

§ ACCOUNTING PRINCIPLES

Based on total Scope 1 + Scope 2 + Scope 3 emissions and reported net revenue (£436.6m in 2024; £556.95m in 2023).

DATA HIERARCHY (ENERGY MIX)

	SCOPE 1			SCOPE 2
	DIESEL	NATURAL GAS	REFRIGERANTS	ELECTRICITY
1. Actual consumption directly stated on the invoice from the vendors	100.00%	100.00%	100.00%	100.00%
2. Data through vendor online portal or similar	0.00%	0.00%	0.00%	0.00%
3. Data supplied by the vendor open request through written communication	0.00%	0.00%	0.00%	0.00%
4. Estimations based on historical data	0.00%	0.00%	0.00%	0.00%
5. Estimations based on average price per unit of consumption (kwh, litres, m^3) for Global Switch Group purchases in the relevant period	0.00%	0.00%	0.00%	0.00%
6. Estimations based on publicly available average price pr. unit of consumption (kwh, litres, m^3)	0.00%	0.00%	0.00%	0.00%

DATA HIERARCHY (SCOPE 3)

CATEGORIES	PURCHASE/ GOODS & SERVICES	CAPITAL GOODS	WASTE	BUSINESS TRAVEL	EMPLOYEE COMMUTING	UPSTREAM LEASED ASSETS	DOWNSTREAM LEASED ASSETS
1. GHG emission data supplied directly by the supplier	0%	0%	0%	0%	0%	0%	0%
2. GHG emission calculated based on actual purchase/weight	0%	0%	100%	100% (Supplier provided mileage)	100% (Survey)	100%	100%
3. GHG emission calculated on the base of net-spend	100%	100%	0%	0%	0%	0%	0%

§ ACCOUNTING PRINCIPLES

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).

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), based on actual waste weight and disposal methods. Business travel emissions are 100% determined using supplier-provided mileage data (Tier 2), while employee commuting emissions rely entirely (100%) on employee survey data combined with standard emission factors (Tier 2). For both upstream and downstream leased assets, emissions are 100% calculated using actual energy consumption data from lease agreements (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.

COMPARISON OF GHG EMISSIONS (2024 VS. 2023)

Our total GHG emissions (market-based) increased from 119,159 tCO_2e in 2023 to 158,974 tCO_2e in 2024, representing a 33% rise. Key changes across scopes include:

SCOPE 1
Scope 1 emissions dropped by 20% in total, despite stationary combustion emissions increasing by 69% driven by increased stationary combustion of the backup generators, mainly due to construction and planned maintenance works involving the electricity connection at our Amsterdam site.

SCOPE 2
Location-based electricity-related emissions reduced by 6% and market-based emissions by 18% reflecting business growth, due to higher energy demand across the Hong Kong data centre, the only one with no renewable electricity.

SCOPE 3

- **Category 2 (Capital Goods)**
  Increased by 35% due to expanded infrastructure investments

- **Category 3 (Fuel and energy related activities)**
  Market based emissions increased by 103% as from 2024 it includes well-to-tank emissions of renewables previously excluded.

- **Category 6 (Business Travel)**
  More than doubled (+115%) post-pandemic, aligning with resumed operations.

- **Category 8 (Upstream Leased Assets)**
  Newly reported (1.24 tCO_2e), previously excluded.

- **Category 13 (Downstream leased assets)**
  includes natural gas from leased assets previously excluded.

E1-7 CARBON REMOVALS AND OFFSETS

(ESRS E1-7; GRI 305-2, 305-5)SASB IF-EU-110a.1)

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 mitigation measures, such as renewable energy procurement, energy efficiency improvements, refrigerant replacement, and supplier engagement.

The company's science-based target pathway excludes the use of offset mechanisms and focuses solely on absolute emissions reductions across Scope 1, 2, and 3.

E1-8 INTERNAL CARBON PRICING

(ESRS E1-8)

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 company'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.

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

§ 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 2023 survey data.
- **Scope 1 and 2 emission factors:**
  IEA 2024 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 2023 where possible, with updates for improved accuracy (e.g. waste disposal classifications). Exclusions (e.g. cooling tower wastewater) were justified by materiality assessments.

Verification:
Scope 1–2 emissions were verified by MyCarbon; Scope 3 underwent verification by Forliance.

E3 – WATER AND MARINE RESOURCES

Water availability and quality are emerging as key constraints in the context of climate change and urban infrastructure growth.

At Global Switch, our operations interface with water systems in several direct and indirect ways, most notably through the use of water-based cooling technologies. As data centres become more integral to the global economy, the water intensity of digital infrastructure is increasingly scrutinised—not only by regulators and communities, but also by customers seeking responsible service providers.

We therefore approach water management as a responsibility. In this disclosure, we describe how Global Switch is responding to both the operational demands and strategic challenges associated with water and marine resources. We assess our Impacts, outline the controls in place to manage them, and identify how climate trends, policy shifts, and stakeholder pressure are reshaping our approach to water management.

E3 - WATER AND MARINE RESOURCES IROS
(GRI 303)

SUBTOPIC	DESCRIPTION OF IRO	CLASSIFICATION	TYPE OF POTENTIAL ANTICIPATED FINANCIAL EFFECT (E3-5)	VALUE CHAIN	TIME HORIZON
Water Resources	**High Water Consumption:** 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	License delays, stakeholder trust, community access to water	Upstream / Own Ops	Short / Medium / Long
	Large-Scale Water Withdrawals: 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	Regulatory change, water cost, continuity Risk	Upstream / Own Ops	Short / Medium / Long



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 design policy includes Risk-based source diversification to ensure continuity.

Non-material Water Aspects (Marine Resources)

Based on our operations and footprint, Global Switch has assessed marine resource Impacts as non-material at this stage. We do not operate offshore infrastructure or facilities with direct marine extraction or discharge. This determination is reviewed annually and may be re-evaluated if our operational context changes (e.g. coastal expansion, new construction with marine interface).

E3-1, E3-2 AND E3-3 WATER POLICIES, ACTIONS AND TARGETS

(ESRS E3-1, E3-2 and E3-3; GRI 303; SASB IF-EU-140a.2)

Global Switch applies a comprehensive water-stewardship framework across its operations and new developments. The table below consolidates our water-related policies (E3-1), management actions and allocated resources (E3-2), and quantitative targets (E3-3), grouped by material Impacts, Risks and opportunities (IROs). Internal governance via the Facility Design Policy and the ESG Steering Group embeds water measures into both day-to-day operations and strategic planning. External alignment is ensured through ISO 14001 and the Climate Neutral Data Centre Pact (CNDCP)-aligned WUE targets. Time horizons, KPIs and monitoring mechanisms are shown for all measures; where actions are ongoing or targets under development, this is indicated accordingly.

Consolidated Table: Water-Related Policies, Actions & Targets

IRO	POLICY / ACTION / TARGET	TIMEFRAME	STATUS	METRIC / KPI	RESOURCE ALLOCATION	INTERNAL POLICY / GOVERNANCE	EXTERNAL FRAMEWORK / STANDARD	DISCLOSURE REF.
High Water Consumption	Embedded in ISO 14001-certified EMS and Facility Design Policy with a lifecycle approach; mandates site metering,	2023–2040	Implemented (policy & metering & monitoring); In progress (retrofits); some sites fitted/ retrofitted with hybrid/closed-loop cooling, recycling in high water -stress areas	Water use (m3)	ESG Steering Group; environmental, design & operations teams; retrofit engineering & Capex	ISO 14001 EMS; Facility Design Policy, ESG Steering Group	ISO 14001; CNDCP	E3-1 , E3-2
	Set design WUE targets for our sites to meet the CNDCP targets, based on Climate, Water Stress and Water Type.	2023-2040	Targets set	Site-level WUE (L/kWh);	Design & operations teams; retrofit engineering & Capex	Facility Design Policy, ESG Steering Group	CNDCP; ISO/IEC 30134-9	E3-3
Large-Scale Water Withdrawals	Facility Design Policy mandates high water stress Risk screening, alternative source integration (industrial, greywater, rainwater)	Ongoing	Implemented (measurements, non-potable water use where possible);	Water withdrawals (m3), Use of other/non-potable water sources (m3)	Design, procurement & site-selection teams; facilities management; environmental consultants; water-sourcing Opex	Facility Design Policy; ESG Steering Group	ISO 14001 EMS;	E3-1, E3-2, E3-3

E3-4 WATER WITHDRAWALS, DISCHARGES AND WUE

(ESRS E3-4; GRI 303-2; SASB IF-EU-140a.2)

As part of our water-related sustainability strategy, we monitor and report water usage to track performance, identify areas for improvement, and ensure accountability in regions facing water stress. This disclosure shows the withdrawal and consumption of water in m3, per site, including the nature of the consumed water (potable and other (non-potable)).

Global Switch discloses total water withdrawals by source and the share occurring in High or Extremely High water-stress catchments, in line with ESRS E3-4, GRI 303-2 and SASB IF-EU-140a.2. We used the **WRI Aqueduct Baseline Water Stress v2023** model to classify each site's catchment stress level. Withdrawal volumes from catchments rated High (40–80 %) or Extremely High (> 80 %) are aggregated to meet the "water consumption in water-stressed areas" requirement.

YEAR	MUNICIPAL POTABLE WITHDRAWAL (m^3)	OTHER WITHDRAWAL (NON-POTABLE/REUSED) (m^3)	TOTAL WITHDRAWAL (m^3)	SEWAGE DISCHARGE (m^3)	WITHDRAWAL IN HIGH/ EXTREME STRESS AREAS (m^3)	% IN HIGH/EXTREME STRESS AREAS
2022	533 629.00	267 172.00	800 801.00	800 801.00	73 806.00[1]	9.2 %
2023	467 325.00	362 499.00	829 824.00	829 824.00	81 845.00[2]	9.9 %
2024	469 304.58	430 216.20	899 520.78	899 520.79	134 949.80[3]	15.0 %

1. Madrid only: 73 806 m^3 in 2022 (9.2 % of 800 801 m^3)
2. Madrid only: 81 845 m^3 in 2023 (9.9 % of 829 824 m^3)
3. All High/Extremely High sites in 2024: 134 949.80m^3 (15.0 % of 899521 m^3)

Total Group withdrawal rose from **800 801 m^3** in 2022 to **899 521 m^3** in 2024 (+12.3%), driven by business growth and broader adoption of non-potable sourcing.

Municipal (potable) withdrawal declined by 12.1% between 2022 and 2024, reflecting the shift toward reclaimed and industrial water (Other Withdrawal +61.1% over three years). All water is sourced from third-party municipal suppliers. No direct withdrawals are made from natural water bodies. No identified withdrawals Impact protected or sensitive ecosystems, based on location mapping. All withdrawn water is discharged post-use, primarily via sewage systems. Hence, consumption (i.e. non-returned water) is minimal and limited to evaporative losses.

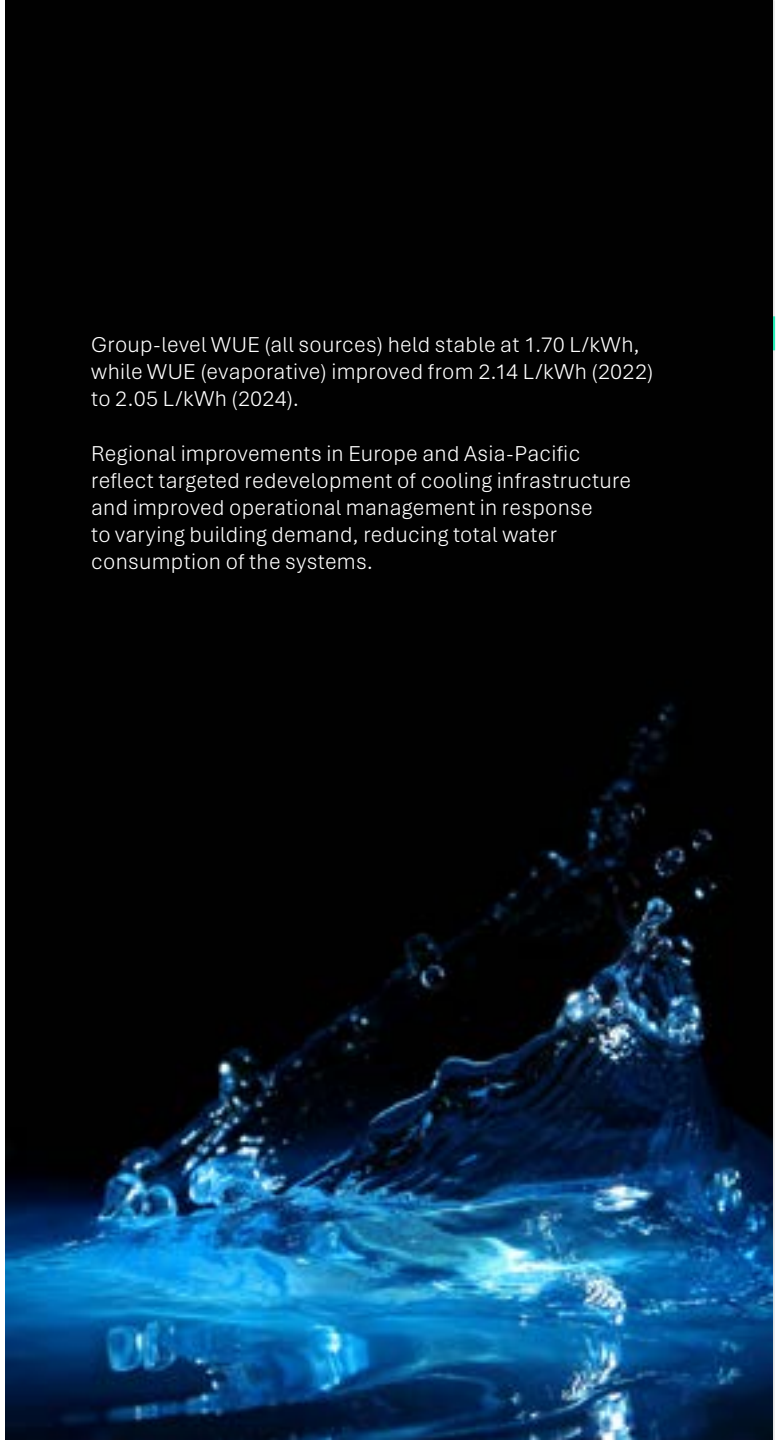
In **2022–2023**, only **Madrid** was classified as an "Extreme" water-stress location; its withdrawals accounted for 9.2% and 9.9% of the Group total, respectively. In 2024, we applied the full WRI Aqueduct Baseline v2023 mapping showed that Madrid, London, Frankfurt were in the in High/ Extremely High stress basins.

Water Usage Effectiveness (WUE) Performance

REGION / GROUP	METRIC	2022	2023	2024
Group	WUE (All water sources)	1.71	1.72	1.70
	WUE (Evaporative cooling only)	2.14	2.11	2.05
Europe	WUE (All water sources)	1.31	1.34	1.32
	WUE (Evaporative cooling only)	2.10	2.05	1.95
APAC	WUE (All water sources)	2.17	2.15	2.11
	WUE (Evaporative cooling only)	2.17	2.15	2.11

Group-level WUE (all sources) held stable at 1.70 L/kWh, while WUE (evaporative) improved from 2.14 L/kWh (2022) to 2.05 L/kWh (2024).

Regional improvements in Europe and Asia-Pacific reflect targeted redevelopment of cooling infrastructure and improved operational management in response to varying building demand, reducing total water consumption of the systems.



§ 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 v2023 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^3) and expressed it as a percentage of total Group withdrawal, thereby fulfilling ESRS E3-4 and SASB IF-EU-140a.2 requirements.

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.

E5- RESOURCE USE AND CIRCULAR ECONOMY

E5-IROS

Global Switch's operations give rise to several material Impacts and Risks related to the use of resources and the circular economy.

These IROs are driven by both upstream activities, including procurement of construction materials and IT infrastructure, and downstream activities, such as waste handling and decommissioning.

Key Impacts include the extraction and processing of raw materials, which contributes to resource depletion and ecosystem degradation, particularly where rare earths or high-carbon materials are involved. End-of-life construction and IT waste, if not properly diverted, presents Risks of environmental degradation and loss of material value. In addition, the large volumes of waste heat generated by data centre operations represent a missed Opportunity if not recovered and may exacerbate local climate effects in dense urban areas.

On the Risk side, Global Switch faces increasing exposure to the scarcity and price volatility of critical minerals, which are essential for server and infrastructure components. This dependence creates a vulnerability to regulatory or geopolitical shifts. These IROs have financial implications in terms of operational costs, procurement stability, reputational exposure, and alignment with long-term decarbonisation and resource efficiency goals.

SUBTOPIC	DESCRIPTION OF IRO	CLASSIFICATION	TYPE OF POTENTIAL ANTICIPATED FINANCIAL EFFECT (E5-6)	VALUE CHAIN	TIME HORIZON
Materials (Resource inflows)	Raw Material Use: 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	Exposure to embodied carbon pricing, reputational Risks from material sourcing	Upstream / Own Ops	Short / Medium / Long
Solid waste / end-of-life materials	End-of-Life Waste: Construction waste and decommissioned IT equipment may contribute to landfill, waste treatment burdens, and lost circular value.	Actual Negative Impact	Rising waste disposal costs, reputational Risk, non-compliance with targets	Own Ops / Downstream	Short / Medium / Long
Waste heat	Thermal Emissions: Waste heat from server operations, if not recovered, may worsen urban heat island effects and reflect energy inefficiency.	Actual Negative Impact	Missed Opportunity for energy reuse; regulatory and reputational implications	Own Ops / Downstream	Medium / Long
Resource inflows (critical materials)	Critical Minerals Dependency: Dependence on scarce inputs (e.g. rare earths) in tech infrastructure creates supply Risk, volatility, and cost exposure.	Risk	Price volatility, procurement disruption, continuity Risk	Upstream	Short / Medium / Long

These issues are considered material due to their potential to affect Global Switch's ability to secure resources at stable prices, meet regulatory and certification requirements (e.g. BREEAM/LEED), maintain community trust in local contexts, and meet its circularity and waste-reduction targets. The company's circularity strategy, embedded in its Facility Design Policy, includes efforts to increase material recovery, integrate circular design, and explore waste heat reuse solutions.

E5-1 TO E5-3 RESOURCE USE AND CIRCULAR ECONOMY POLICIES, ACTIONS, AND TARGETS

(ESRS: E5-1, E5-2, E5-3, GRI: 301-1, 301-2, 302-2, 306-1, 306-2, SASB: IF-EU-150a.1, a.2, a.3)

Consolidated Table: Resource use and Circular Economy-Related Policies,

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; whole lifecycle assessments required by Facility Design Policy for all new developments and major renovations	Ongoing	Considered for all BREEAM/ LEED/Green Mark certified new builds through Whole Lifecycle Carbon Assessments (WLCA)	% of projects with WLCAs carried out at design-stage	Design & procurement teams; Capex via project budgets	Facility Design Policy; ESG Steering Group	BREEAM, LEED, ISO 14001	E5-1, E5-2
End-of-Life Waste	100% diversion from landfill target waste by 2030	2023–2030	In progress – waste minimisation and management with the aim of diverting waste from disposal.	% of waste diverted from landfill	Design & Ops teams; waste vendors; retrofit Capex	Facility Design Policy; ESG Steering Group	ISO 14001	E5-1, E5-2, E5-3
Waste Heat	New site designs include infrastructure readiness for waste heat recovery	2024–2027	In progress	Waste heat reuse	Engineering teams; energy & sustainability leads	Facility Design Policy; ESG Steering Group	ISO 50001	E5-2
Critical Minerals Dependency	Circularity screening of Tier 1 suppliers to reduce exposure to mineral scarcity and sourcing Risks	2023–2030	The top 100 of suppliers screened for 2024; integration ongoing in supplier evaluation tools	% of suppliers evaluated for circularity Risks	Procurement & ESG teams; Capex where needed	Supplier Code of Conduct; ESG Steering Group	OECD Due Diligence Guidance	E5-1
Circular Design Integration	Develop and deploy circular design guidelines for retrofits and expansions	2023–2025	Under development – internal consultation underway;	# of projects applying circular design	Design & ops teams; external consultants; retrofit Capex	Facility Design Policy; Engineering team	ISO 14001, Circular Economy Action Plan (EU);	E5-1, E5-2

E5-4 RESOURCE INFLOWS

(E5-4, GRI 301-1, 301-2, SASB IF-EU-150a.1–a.3)

Global Switch does not yet systematically collect or consolidate quantitative data on material inflows (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 these data are not yet aggregated across the portfolio. The company is currently assessing internal systems and supplier data availability to enable reporting against E5-4 and GRI 301-1/301-2 in 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.

E5-5 RESOURCE OUTFLOWS AND END OF LIFE WASTE

Table 1. Waste by composition in metric tons

	WASTE GENERATED 2024 (t)	WASTE GENERATED 2023 (t)	WASTE DIVERTED FROM DISPOSAL 2024 (t)	WASTE DIVERTED FROM DISPOSAL 2023 (t)	WASTE DIRECTED TO DISPOSAL 2024 (t)	WASTE DIRECTED TO DISPOSAL 2023 (t)
WASTE COMPOSITION						
Batteries & Accumulators	0.27	0.777	0	0.56	0.27	0.22
Construction/Demolition Waste	17.74	61.95	17.74	61.95	0	0
Electronic Waste (WEEE), incl fluorescent lamps	6.34	2.67	4.99	1.27	1.35	1.40
Food & Organic Waste	0.1	0	0.10	0	0	0
Fridges	0.03	0	0.03	0	0	0
General Residual / Mixed Waste	179.99	200.69	0	0	179.99	200.69
Glass	0.10	0	0.10	0	0	0
Metals (scrap, ferrous/non-ferrous)	49.16	18.14	48.11	18.14	1.05	0
Oils, solvents & chemicals	4.15	0.25	0	0	4.15	0.25
Other hazardous	34.18	3.18	0	0	34.18	3.18
Paper & Cardboard	47.17	32.61	42.02	23.02	5.15	9.59
Plastics	8.21	2.51	8.14	0	0.07	2.51
Wood (untreated + pallets)	31.69	37.32	14.59	25.5	17.10	11.82
TOTAL (t)	**417.69**	**360.097**	**135.82**	**130.44**	**281.87**	**229.66**

Table 2. Waste diverted from disposal by recovery operation, in metric tons (t)

	OFFSITE TREATMENT (t) 2024*	OFFSITE TREATMENT (t) 2023*
HAZARDOUS WASTE		
Recycling	5.02	1.83
TOTAL	**5.02**	**1.83**
NON HAZARDOUS WASTE		
Recycling	130.70	128.61
Anaerobic digestion	0.10	0
TOTAL	**130.80**	**128.61**

*No onsite treatment of waste was recorded in 2024 or 2023

Table 3. Waste directed to disposal by disposal operation, in metric tons (t)

	WASTE DIRECTED TO DISPOSAL (t) 2024	WASTE DIRECTED TO DISPOSAL (t) 2023
HAZARDOUS WASTE		
Incineration (with energy recovery)	1.06	1.43
Incineration (without energy recovery)	38.89	0.25
Landfilling	0	3.37
TOTAL	**39.95**	**5.05**
NON HAZARDOUS WASTE		
Incineration (with energy recovery)	43.71	212.15
Incineration (without energy recovery)	192.95	7.17
Landfilling	5.26	5.29
TOTAL	**241.92**	**224.61**

§ ACCOUNTING PRINCIPLES

Our calculation is based on data available during the reporting period, from each individual facility. 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.

Additionally, a total of 5,065 EUR of spend for waste treatment was included in the 2024 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.

Diversion from Landfill

2023: 95.5%

2024: 43.2%

Calculated as the % of the total diverted from landfill and incineration without energy recovery, i.e. the total reused, recycled, anaerobically digested, incinerated with energy recovery.

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SOCIAL

S1 OWN WORKFORCE

S1 SBM-3 AND S1-1 TO S1-5: MATERIAL IROS, POLICIES, ENGAGEMENT, ACTIONS AND TARGETS
(S1 SBM-3, S1-1, S1-2, S1-3, S1-4, S1-5, GRI 2-30, 401-1, 402-1, 404-2, SASB TC0203-17, TC0203-18, TC0203-19)

Material Workforce Impacts and Strategic Relevance (SBM-3)

Global Switch identifies material own workforce-related Impacts, Risks, and opportunities (IROs) through its Double Materiality Assessment (see our Double Materiality Assessment section), incorporating stakeholder input and validation by the ESG Steering Group. These IROs include: fair and secure employment, DEI, wellbeing, upskilling, and access to remedy. The Group HR Director oversees policy response and implementation.

Each IRO is linked to business operations, strategy, and people priorities. The full summary table, included under this section, maps IROs to policies, actions, time horizons, and progress indicators.



Consolidated Table: Own Workforce – Material IROs, Policies and Actions

IRO SUBTOPIC	MATERIAL IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN LOCATION	TIME HORIZON	BUSINESS ACTION(S)	KEY POLICIES	STATUS / NOTES
Secure employment	Secure employment promotes job stability and financial security for employees, supporting livelihoods and local economic resilience.	Actual Positive Impact	Own Operations	2024 / 2025–30 / 2031+	Structured recruitment, succession planning, internal mobility review	GS Employee Handbook	In place; Talent Review Toolkit rollout in 2025
Adequate wages	Fair and adequate wages reduce economic stress and improve motivation, job satisfaction and retention.	Actual Positive Impact	Own Operations	2024 / 2025–30 / 2031+	Salary benchmarking aligned to market	-	In place
Freedom of association	Freedom of association enables employees to organise, express concerns and engage in collective advocacy, enhancing workplace rights and participation.	Actual Positive Impact	Own Operations	2024 / 2025–30 / 2031+	Works councils in Paris and Frankfurt (where legally required)	-	In place
Work–life balance	Work-life balance can reduce stress and mental-health challenges, improving employee morale and performance.	Potential Positive Impact	Own Operations	2024 / 2025–30 / 2031+	Flexible policy and agile working guideline (in draft), France RTT scheme (in draft), Myndup wellbeing support	GS Flexible Working Policy, Agile Working Guideline (draft), France RTT (draft)	In place or under development
Training & skills (Impact)	Training and skills development build employee competencies, improve job performance and support career growth.	Actual Positive Impact	Own Operations	2024 / 2025–30 / 2031+	LinkedIn Learning, Thomas Perform, Myndup coaching, technical upskilling (incl. reskilling initiatives linked to climate transition planning)	Equal Opportunities Policy Employee Handbook chapter on Learning and Development Talent Review and Succession Planning Toolkit (released in 2025)	In place; toolkit relaunch in 2025
Training & skills (Opportunity)	Productivity and retention gains depend on a skilled and engaged workforce.	Opportunity	Own Operations	2024 / 2025–30 / 2031+	Same as above; links to long-term workforce planning and digital capability uplift	Same as above	Reaffirmed as strategic priority in 2025 L&D strategy
Employee privacy	Inadequate protection of employee privacy may breach fundamental rights and erode trust in the workplace.	Potential Negative Impact	Own Operations	2024 / 2025–30 / 2031+	ISO 27001 controls; GDPR-aligned internal processes; privacy training	Workforce Privacy Policy; ISO 27001	In place
Diversity & inclusion	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	2024 / 2025–30 / 2031+	Global RESPECT Committee, ChickenShed DEI training programme (bias awareness), Launch of Women of Global Switch initiative DEI-informed recruitment and inclusive job design practices	Equal Opportunities Policy; Employee Handbook	In place; further targets and tracking in development for 2025–2026

Policies and Actions on Workforce Impacts (S1-1 & S1-4)

To address any workforce related Impacts, Risks and opportunities, Global Switch has implemented a suite of workforce policies and programmes as shown in the table above. These policies are owned by Group HR and Legal, with implementation supported by the ESG Steering Group. Communication occurs through training, onboarding, and the company's intranet, The Switch. Mandatory compliance training in 2024 achieved >98% completion. Effectiveness is monitored through engagement survey results (+6-point gain in 2024), improved attrition (11%), and 100% participation in annual performance reviews. Work is underway to increase internal accessibility reviews and formalise the job design review cycle. Resources include internal budget allocations, dedicated HR and ESG functions, and partnerships with third parties such as ChickenShed and LinkedIn Learning. Global Switch uses employee feedback, HR priorities, and ESG governance to determine actions. While not guided by a fixed prioritisation model, decisions are informed by materiality, Risk exposure, and stakeholder input.

Workforce Engagement and Target-Setting (S1-2 & S1-5)

Global Switch actively engages its workforce through structured and inclusive channels:

- Annual Staff Engagement Survey (96% response rate)
- Local and Group-wide Townhalls
- The RESPECT Committee
- Women of Global Switch forum
- Direct line manager input and HR business partnering

Insights gathered from these sources shape policy priorities, training strategy, DEI initiatives, and wellbeing programmes. While employees are not directly involved in formal target-setting, they contribute meaningfully to the process. For example, feedback on flexible working and career development directly informed 2024 policy changes.

Global Switch defines workforce-related targets through its ESG Plan, with progress tracked across the year. These targets align with the SDGs listed in section ESG Targets and 2024 Progress. Intended outcomes include greater inclusion, wellbeing, and fairness in development and reward. While social targets are not yet fully standardised across years, the company is progressing toward improved consistency in measurement and review.

Access to Remedy and Protection from Retaliation (S1-3)

Global Switch provides multiple channels to raise concerns, report Impacts, and access remedy. These include:

- A Grievance Policy allowing informal and formal resolution routes
- A 24/7 confidential Whistleblowing Channel is available via whistleblowing@globalswitch.com, accessible in all operating languages
- Non-retaliation provisions embedded in policies and reinforced through onboarding and compliance training

These channels are governed by Legal and HR and supported by communication on The Switch. All reports are logged and escalated in line with Group policy. No substantiated grievances or whistleblowing cases were reported in 2024.

Employee awareness and trust in these mechanisms are evidenced through engagement scores on psychological safety and team trust. The system's effectiveness is reviewed quarterly through case tracking and survey feedback.

S1-6 AND S1-7 CHARACTERISTICS OF EMPLOYEES AND NON-EMPLOYEES

(SRS S1-6 and S1-7, GRI 2-7, 401-1 and SASB TC0203-18)

As of 31 December 2024, Global Switch employed a total of 306 permanent staff across its seven Tier-1 city campuses and a corporate office.

All employees are engaged under formal permanent contracts in accordance with national labour legislation. The company does not use zero-hour contracts or temporary agency workers, and no fixed-term employment contracts were in effect during the reporting period.

All employment relationships are governed by the Group's Employee Handbook and Equal Opportunities Policy, and no unlawful or restrictive employment practices are used. Employees are free to terminate their contracts upon providing standard notice periods. Two contractors supported head-office functions under service agreements, with no control over their employment terms.

Turnover and attrition were actively monitored and improved during 2024. A total of 58 employees left the company, resulting in a 19% total turnover rate. Voluntary attrition, defined as resignations initiated by employees, was 11%, down from 15% in 2023. Exit-reason tracking will be introduced from 2025.

Key workforce management initiatives in 2024 included



Enhanced recruitment and hiring-manager training

Full participation (100%) in self-led performance and career development reviews



Expanded wellbeing support via the Myndup platform



Site-wide employee engagement surveys



Launch of the Women of Global Switch programme and DEI leadership initiatives

Additional demographic and working-time data are being integrated into Global Switch's HR system (Workday) and will be disclosed from 2025. A summary of the 2024 workforce profile is provided below.

Table: Workforce Profile at the end of 2024

METRIC	2024 VALUE	NOTES
Total employees (permanent)	306 (of whom 85 are female)	All under permanent contracts
Full-time employees	306	Includes operational staff across all geographies
Part-time employees	0	No part-time permanent roles
Zero-hour contracts	0	None
Fixed-term contracts	0	Not tracked
Temporary agency workers	0	Not tracked
Contractors (non-employees)	2	Based at the Corporate office
Self-employed / non-employees in workforce	2	Includes contractors above; tracked separately
By site	AMS: 27, FRA: 25, HKG: 32, LON: 32, MAD: 20, PAR: 24, SHA:1, SIN: 52, Corporate office: 93	End-of-year headcount (Total=306)
Total turnover rate	19%	58 leavers (voluntary and involuntary)
Voluntary attrition rate	11%	Down from 15% in 2023
Exit reasons	Not tracked	Exit reasons were not systematised in 2024 and are therefore not disclosed.
New joiners	94 (60 male, 34 female)	~30% new hire rate
New joiners by site	New joiners by site AMS- M=9 F=2, FRA- M=8 F=0, LON- M=9 F=1, Corporate office- M=26 F=16, MAD- M=4 F=1, SIN- M=6 F=6, HKG- M=3 F=3	Based on HR data

§ ACCOUNTING PRINCIPLES

The reported figures cover all permanent employees under Global Switch's operational control as of 31 December 2024. Headcount data reflects the number of individual employees on payroll at year-end. The full-time employee total includes all staff with full-time contracts regardless of role or location; part-time or temporary agency workers are not employed.

Turnover metrics were calculated as follows:

- **Total turnover** = number of employees who left the company during the year (voluntary and involuntary) ÷ average headcount
- **Voluntary attrition** = number of resignations submitted by employees during the year ÷ average headcount

New-joiner data is based on the number of employees who joined during the calendar year. Gender and age disaggregation for new hires and leavers is currently partial and will be expanded with future HR system enhancements.

Contractor and self-employed worker numbers reflect individuals engaged through third-party service agreements to support operations but who are not employees of Global Switch. No temporary agency staff or fixed-term employees were engaged during the reporting period.

The reporting boundary is consistent with the consolidation boundary defined in Section About this Report - Basis for Preparation of this report, covering Global Switch's data centres and head office operations under operational control. Figures exclude divested operations in Australia.

S1-8 COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

(ESRS S1-8, GRI 2-30)

Global Switch recognises the right of all employees to organise, join trade unions, and participate in social dialogue. The company complies with all national laws on freedom of association and collective bargaining in the jurisdictions where it operates.

As of 31 December 2024, **14.4% of Global Switch's workforce** was covered by collective bargaining agreements (CBAs), specifically those employed at the Paris site, where such agreements are in place. In addition, **works councils or equivalent bodies** operate in **France and Germany**, ensuring that employees are represented in matters such as working conditions, consultation, and workplace policies.

The company does **not currently meet the ESRS S1-8 threshold** requiring disclosure of coverage rates for each EU/EEA country (≥50 employees or ≥10% of the global workforce in any single country). Nonetheless, Global Switch voluntarily discloses its global CBA coverage rate as part of its commitment to transparency and social dialogue.

The Group Employee Handbook outlines employees' rights to engage in representation activities, and HR and Legal functions are responsible for ensuring adherence to national collective labour standards. There were no known violations or disputes regarding these rights in 2024.

Summary Table: Social Dialogue Coverage (2024)

METRIC	VALUE
Total employees covered by collective bargaining agreements	44
% of total workforce covered by CBAs	14.4%
Countries with active works councils	France, Germany
Countries exceeding ESRS country-level threshold (≥50 employees or ≥10%)	None



§ ACCOUNTING PRINCIPLES

The collective bargaining agreement (CBA) coverage figure was calculated as the number of employees covered by active CBAs as of 31 December 2024, divided by the total permanent workforce (306). CBA coverage is currently limited to employees in Paris, France. Works council presence was verified by HR in accordance with national legal thresholds and employee representation frameworks.

No country exceeded the ESRS-mandated threshold of ≥50 employees or ≥10% of the global workforce. Global Switch does not collect granular representation data by employment type or gender but commits to reviewing reporting enhancements in future years.

S1-9 DIVERSITY AND EQUAL OPPORTUNITY
(ESRS S1-9, GRI 405-1, 405-2)

Global Switch recognises that a diverse and inclusive workforce strengthens performance, innovation and long-term resilience.

In 2024, the company made meaningful progress in advancing gender balance, promoting awareness of inclusion, and formalising initiatives to increase representation across all levels.

Key initiatives during the year included:

Launch of the **Women of Global Switch** programme (Corporate Office), with planned expansion in 2025



Formation of the **RESPECT Committee**, a DEI working group with monthly governance engagement



Rollout of **bias awareness training** to over 75% of employees via ChickenShed





Inclusive recruitment measures (gender-neutral job ads, diverse interview panels, internal mobility tracking)

Ongoing review of key policies to address family leave, menopause, and carers' needs

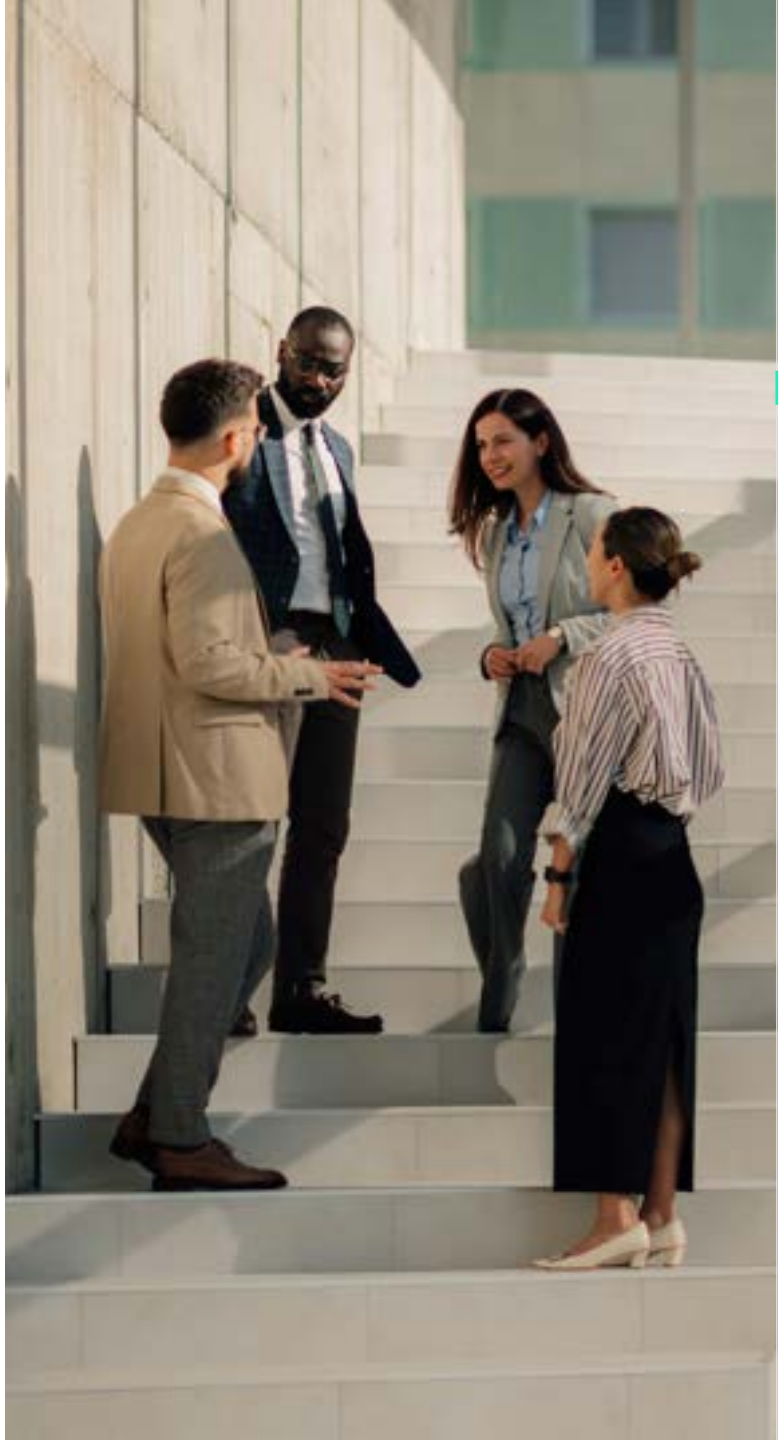
Workforce Diversity (S1-9, GRI 405-1)

As of 31 December 2024, women made up **28%** of Global Switch's workforce (85 out of 308 employees), with representation varying by site and role. Gender diversity across age bands and professional categories is summarised below.

Table: Workforce by Age and Role (2024)

AGE GROUP	NO. OF EMPLOYEES	% OF WORKFORCE
Under 30	21	6.9%
31–50	195	63.7%
51+	90	29.4%
TOTAL	**306**	**100%**

ROLE CATEGORY	NO. OF EMPLOYEES	% OF WORKFORCE
Directors	22 (20 Male/2 Female)	7.2%
Line Managers	90	29.4%
Others	194	63.4%
TOTAL	**306**	**100%**



An internal DEI survey conducted in 2024 gathered **partial ethnic identity data** from the workforce. The overall response rate was 53.5% (139 out of 299 employees). Among respondents:

Asian
17.4%

White
20.4%

Black / African / Caribbean
2.3%

Mixed / Multiple ethnic groups
2.0%

Other (self-described)
3.3%

This data is being used to set baselines for future disclosure. No ethnicity-based targets have been published to date.

Leadership Diversity

As of 31 December 2024, the Global Switch Board consisted of **7 Directors**, of whom **1 was female** (14%). The company currently does not collect data on the age, nationality, or ethnic background of Board members. Board appointments are made by shareholder nomination or direct appointment, guided by the business needs and diversity criteria where applicable.

The **Executive Committee** includes the CEO, CFO, COO, CLO, CCO, and other Group Directors. Gender diversity across executive and senior leadership is a future area of focus. In 2024, leadership training and succession planning included an emphasis on gender balance and inclusive leadership.

§ ACCOUNTING PRINCIPLES

- Workforce data reflects Global Switch employees under operational control as of 31 December 2024.
- Gender and age categories are based on HR system data.
  Role categories (Director, Line Manager, Other) are determined by job grade.
- Ethnic diversity data is self-reported and was gathered anonymously via an internal survey in 2024. Only complete responses are counted in ethnic breakdown figures.
- 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.



S1-10 AND S1-11 WAGES AND SOCIAL PROTECTION

(S1-10 and S1-11; GRI 401-2, GRI 202-1)

Global Switch is committed to fair and competitive remuneration, aligned with local market conditions and the strategic needs of the business. To ensure wage fairness, Global Switch partners with an external consultant (WTW) to benchmark employee roles against relevant local market conditions. The benchmarking process applies a structured methodology based on thousands of role profiles across multiple sectors, allowing Global Switch to evaluate internal roles using globally recognised benchmarks. In 2024, key roles were assessed for market competitiveness, with salary adjustments applied as needed to maintain retention and reflect evolving market conditions.

The company does not currently benchmark wages against national living wage standards. Therefore, Global Switch does not yet report on the percentage of employees not covered by adequate wages, as defined by ESRS S1-6. The company is assessing its ability to align with nationally recognised adequacy thresholds in future years.

§ ACCOUNTING PRINCIPLES

At present, the company does not track social protection coverage as a percentage disaggregated by gender, employment type or location. All permanent employees are enrolled in statutory social protection schemes, and voluntary benefits are provided through HR-managed country-level packages. Temporary or agency workers employed are not tracked for reporting purposes.

Social Protection and Employment Benefits

All eligible employees receive a competitive benefits package tailored to national frameworks. In most regions, this includes:

- Pension and life insurance contributions
- Private medical coverage
- Paid sick leave and maternity/paternity leave, incl. adoption
- Bereavement leave, IVF and antenatal support
- Counselling and coaching via the **MYNDUP wellbeing platform**

In 2024, Global Switch reviewed and updated its family- and health-related policies, including provisions for carers leave, menopause support, and neonatal loss. The company also introduced additional support mechanisms such as wedding leave and fertility-related benefits, often exceeding statutory requirements.

S1-12 PERSONS WITH DISABILITIES

(S1-12, GRI 405-1)

Representation and Monitoring of Disability Status

Global Switch is committed to fostering an inclusive workplace in which all employees, including those with disabilities, are respected and supported. As part of its commitment to diversity, equity, inclusion and belonging (DEI&B), the company has begun tracking the representation of persons with disabilities through voluntary self-identification.

As of 31 December 2024:

- **Three employees** have voluntarily disclosed that they identify as having a disability
- Of these, **two are based in the UK** and **one in Germany**
- This represents approximately **1% of the workforce** (based on available disclosure)

§ ACCOUNTING PRINCIPLES

Disability status is currently tracked through voluntary disclosure mechanisms, consistent with privacy laws and cultural norms in each operating country. Employees may self-identify via internal HR systems or direct engagement with local HR teams. Participation is not mandatory and is subject to employee consent and data protection standards.

At present, Global Switch does not yet capture gender-disaggregated data for employees who self-identify as having a disability, nor does it conduct disability-specific engagement or inclusion monitoring. However, disability is explicitly covered in the company's Equal Opportunities Policy, which prohibits discrimination based on physical, sensory, cognitive, or other forms of disability.

The company recognises the importance of improving accessibility and inclusivity for people with disabilities and is reviewing its approach to workplace adjustments and data transparency as part of its broader DEI&B strategy. Accessibility initiatives and inclusive job design are being considered in future workplace planning and HR policy development.

S1-13 TRAINING AND SKILLS DEVELOPMENT

(ESRS S1-13, GRI 404-1, 404-2, 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.

As a company serving the digital economy, our focus on developing the competency and skills of our employees is a prime differentiator and key to maintaining our strategic competitiveness. In addition to the continuous upskilling of our people and encouragement to pursue further learning experiences, such as professional seminars and training courses, we also offer financial support for additional academic qualifications and generally cover the cost of professional membership subscriptions.

At a senior level, we invest in developing our leadership and management team, which plays a crucial role in our success. This includes identifying key talent each year and creating tailored development plans for them, as well as formulating clear succession plans for critical leadership roles. Across the company, 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 to identify top talent for the Group's succession plan.

In 2024, all 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, and succession planning was undertaken for critical leadership roles.

Training was delivered through a combination of:

LinkedIn Learning
integrated with Workday

Thomas Assess
tools for onboarding and role transitions

Leadership development
programmes focused on sustainability and inclusion

Technical and regulatory training
delivered locally (e.g. ISO standards, IT security)

Myndup wellbeing platform
(mental health and professional coaching)

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Inclusion Training

In addition to technical and leadership development, Global Switch delivered targeted training on **inclusion and bias** in 2024. Partnering with the **ChickenShed Theatre Company**, these workshops reached over **75% of invited employees** across both in-person and virtual sessions. Training focused on inclusion, self-awareness, and psychological safety. Completion ranged from 67% to 100% depending on site, with especially high coverage in Madrid (100%), Frankfurt (83%), and the Corporate Office (77%).

Summary Table: 2024 Training Metrics (by Site and Gender)

SITE	TOTAL TRAINED	TOTAL HOURS	AVG. MALE (HRS)	AVG. FEMALE (HRS)
Amsterdam (AMS)	30 (24M / 6F)	1,236	49	10
Frankfurt (FRA)	22 (22M / 0F)	332	15	—
Hong Kong (HKG)	8 (8M / 0F)	119	14.9	—
London (LON)	38 (32M/6F)	832	686	146
Madrid (MAD)	21 (15M / 6F)	466.5	16	37
Paris (PAR)	21 (13M / 8F)	573	25	28
Singapore (SIN)	34 (24M / 10F)	1803	58.8	3.9
Corporate Office	[Data not yet available]	—	—	—
TOTAL (Reported Sites)	**174**	**5,358.5**	—	—

Note: Training data from the Corporate Office will be integrated once available.

§ ACCOUNTING PRINCIPLES

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, and average hours per trained employee. These values were manually calculated as:

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

Training figures from London, Singapore, and the Corporate Office were not available at the time of reporting. Training-hour reporting and analytics are being enhanced through Workday and will be expanded to cover 100% of the workforce in future reports.

The 2024 inclusion and unconscious bias training delivered by the ChickenShed Theatre Company was manually tracked by attendance. Completion rates ranged from 67% to 100% across sites. These workshops are referenced as evidence of thematic learning coverage but are not included in the total hours reported.

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.

S1-14 HEALTH AND WELLBEING

(ESRS S1-14; GRI 403-1 to 403-9; GRI 412; GRI 2-25, 2-26; SASB IF-RE-320a.1, IF-RE-450a.1)

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.

In 2024, the company extended access to MYNDUP, a digital mental health and wellbeing platform, to all employees across the Group. According to employee surveys 96% indicated that they value the services provided by MYNDUP, and 93% reported feeling more motivated and productive as a result of accessing the system and its benefits.

Wellbeing-related actions undertaken at the site level included:

- Ergonomic workstation assessments in London and Hong Kong to mitigate musculoskeletal Risks
- Stress management awareness training sessions in Paris and Frankfurt
- Integration of wellbeing conversations into the annual appraisal

The company also progressed its family-friendly and health-related policies with updates to:

- Menopause support
- Carer's leave provisions
- Neonatal loss policy
- These updates reflect evolving UK and EU legal standards and are being implemented across all Global Switch operations

Occupational Health and Safety

Global Switch operates a Group-wide ISO 45001-certified Health and Safety Management System that applies to all data centres and is working towards implementation for the corporate office operations. This system includes site-specific Risk assessments, incident reporting procedures, mandatory training, and monthly reporting. Each site participates in annual management reviews under the system.

Health & Safety Metrics

Employees: No recordable incidents involving employees in 2024

Health & Safety Metrics-Contractors

There was one recorded injury in 2024 involving a contractor, which took place in our London site. No other recordable injuries in 2024.

§ ACCOUNTING PRINCIPLES

- Data includes all full-time employees. Contractor data reflects workers at sites where Global Switch exercises operational control and not 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.
- Data is sourced from site-level monthly reports and verified through the ISO 45001 system.

Management of Health and Safety Risks

Each site maintains structured Risk identification and control procedures aligned with ISO 45001. Methods used include:

- Risk Assessments, Permit-to-Work systems, and Method Statements
- Site-specific walkthroughs, toolbox talks, and H&S reviews
- Use of external experts for Risk assessments and mitigation planning in regions such as Singapore and Madrid
- Weekly reviews and hazard tracking systems integrated into Global Switch's H&S systems

Contractors undergo prequalification and site induction procedures. On-site works are subject to controls such as isolation procedures, confined space entry requirements, and Risk-specific training.



S1-15 WORK-LIFE BALANCE METRICS
(S1-15, GRI 401-3)

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 company intranet, **The Switch**.

As of 31 December 2024, **100% of employees** were eligible for family-related leave. The **Flexible Working Policy** is in place across all regions, and an **Agile Working Policy** is under development. Additional work-life balance measures include menopause support, IVF and antenatal leave, and access to mental health services through the **MYNDUP platform**.

Employees are made aware of their entitlements through onboarding, HR communications, and line manager support. While leave usage data by gender and region is not yet consolidated at Group level, tracking improvements are underway through the Workday HR system.

The 2024 Staff Engagement Survey showed improvements in perceptions of work-life balance and flexibility, reinforcing the effectiveness of the company's approach.

Global Switch does not yet report return-to-work or retention rates following family leave across all sites. These metrics are being reviewed for inclusion in future disclosures, in line with GRI 401-3 requirements.

§ ACCOUNTING PRINCIPLES

- Leave eligibility is based on national legislation and standard contract terms.
- Usage, return, and retention data are currently maintained locally and not yet centrally aggregated.
- All information reflects confirmed HR policies and available practice data as of 31 December 2024.

S1-16 REMUNERATION METRICS

(S1-16, GRI 405-2, SASB TC0203-17)

Remuneration Structure and Pay Equity Monitoring

Global Switch applies a globally consistent approach to compensation that aims to ensure fairness, competitiveness, and transparency across all regions. Remuneration structures are based on job evaluation, performance, and market benchmarking.

The company engages **Willis Towers Watson (WTW)** to assess its compensation structure annually. Roles are benchmarked using WTW's global job grading methodology, ensuring consistent comparison across jurisdictions and alignment with local market data. Salary reviews occur annually, informed by:

- CPI adjustments
- Individual performance
- External market competitiveness

Status of Gender Pay and Remuneration Reporting

As of 2024:

- Gender pay gap data is not yet publicly reported at Group level
- Internal benchmarking reviews are ongoing, with no material gender-based disparities identified to date
- Compensation reviews are informed by performance ratings and succession planning processes
- Pay fairness is governed by the Equal Opportunities Policy, which prohibits discrimination in compensation and reward

S1-17 INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

(S1-17, GRI 406-1, UNGP aligned)

Human rights risks are managed through Global Switch's formal **Sustainability Due Diligence (SDD) framework**, described in Section Our Sustainability Due Diligence Framework. The company aligns with the OECD Guidelines and the UN Guiding Principles on Business and Human Rights.

In 2024:

- No substantiated employee-related human rights incidents were reported
- All HR-related policies were reviewed to ensure continued alignment with local laws and international standards
- The Group HR Director, Legal team and ESG Steering Group jointly oversaw due diligence for employees and contractors

§ ACCOUNTING PRINCIPLES

- Human rights and policy training coverage is tracked through onboarding and compliance records; ChickenShed participation was manually logged by site.
- Grievance data was compiled from HR and Legal registers. No formal or informal grievances requiring escalation were recorded in 2024.

Training on Human Rights and Social Policies

All new employees receive training on the following:

- Code of Conduct
- Anti-Harassment Policy
- Equal Opportunities Policy
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy

Training is delivered in English and local languages as needed and is required upon onboarding. Refresher training is provided through policy updates and compliance cycles.

In 2024, targeted unconscious bias training was delivered through the ChickenShed Theatre Company. These sessions reached over 75% of invited staff across all sites and focused on inclusion, self-awareness and psychological safety.

Grievance Mechanisms and Remedies

Employees may raise concerns through informal dialogue, HR, or formal written grievances in line with the company's **Grievance Policy**. The policy guarantees procedural fairness and is overseen by the Chief Legal Officer and Group HR Director.

Whistleblowing Policy and Channels

Our Whistleblowing Policy covers various forms of misconduct, investigative procedures, and protection of the whistleblower's safety. The policy forms part of the mandatory compliance training for all new joiners, as well as refreshed training for all employees.

We have implemented a whistleblowing system compliant with the EU directive on whistleblowing, accessible to all employees. We ensure employees are aware of the whistleblowing mechanism through communication on our intranet. The Whistleblowing Policy is also available in multiple languages applicable to our regions.

At Global Switch, we are committed to fostering a transparent and ethical workplace. Employees are empowered to raise concerns anonymously through our dedicated whistleblowing channel at whistleblowing@globalswitch.com. This initiative, along with other policies, is reinforced by our comprehensive Disciplinary Policy, which outlines a clear framework for addressing and taking action against misconduct.

In 2024, here were no cases of misconduct or instances of whistleblowing.

S2 WORKERS IN THE VALUE CHAIN

S2 SBM-3 MATERIAL IROS, POLICIES AND ACTIONS

(SBM-3, GRI 2-25, 3-3(b–c), 414-1, SASB TC0203-20)

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. While these workers are not directly employed by Global Switch, the company recognises its responsibility to respect human rights across its business relationships and to align with international standards.

Material IROs were identified through the company's Double Materiality Assessment (see relevant section), which incorporated supplier spend analysis, ESG Risk tagging, and insights from best-practice frameworks including ESRS, GRI, and SASB. These IROs relate to working time, health and safety, child labour, forced labour, and privacy.

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. At present, the company's core approach focuses on the use of reputable suppliers and enforcement of expectations through its Supplier Code of Conduct.



Table: Value Chain Workers – Material Impacts, Policies and Actions

IRO SUBTOPIC	MATERIAL IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN LOCATION	TIME HORIZON	BUSINESS ACTION(S)	KEY POLICIES	STATUS / NOTES
Working time (value-chain)	Particularly where cost or delivery pressures on suppliers lead to extended shifts or limited rest time posing risks to worker health and well-being.	Potential Negative Impact	Upstream	2024 / 2025–30 / 2031+	SCoC requires compliance with relevant regulation	SCoC	In place
Health & safety (value-chain)	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	2024 / 2025–30 / 2031+	Appropriate procurement policies to ensure that only competent contractors and suppliers are engaged by Global Switch. SCoC requires Occupational H&S arrangement from contractors and compliance with relevant regulations.	GS Health and Safety Policy, SCoC	In place
Child labour	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	2024 / 2025–30 / 2031+	SCoC requires due diligence for ensuring no child labour	SCoC	In place
Forced labour	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	2024 / 2025–30 / 2031+	SCoC requires due diligence for ensuring no forced labour	SCoC	In place
Privacy (value chain)	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	2024 / 2025–30 / 2031+	SCoC requires due diligence for ensuring no breaches to privacy in workforce/supply chain and affected communities	SCoC	In place

S2-1 POLICIES RELATED TO VALUE CHAIN WORKERS

(S2-1, GRI 2-23, 2-24, 408-1, 409-1, 414-1, SASB alignment TC0203-20)

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.

S2-2 PROCESSES FOR ENGAGING WITH VALUE CHAIN WORKERS ABOUT IMPACTS

(S2-2, GRI 2-25, 414-2, SASB TC0203-20)

Global Switch does not currently operate formal processes to engage directly with workers in its value chain. Supplier relationships are governed through contractual and procurement mechanisms, with no structured dialogue mechanisms in place for subcontracted or supplier-employed personnel.

However, the company recognises the growing expectations of international standards and reporting frameworks (including GRI 414 and ESRS S2) in relation to value chain worker engagement. These expectations are informing the ongoing development of Global Switch's Responsible Supply Chain strategy, which will guide future enhancements in this area.

S2-3 PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR VALUE CHAIN WORKERS TO RAISE CONCERNS

(S2-3, GRI 2-26, 408-1, 409-1, SASB TC0203-20)

Global Switch maintains a 24/7 confidential whistleblowing channel (whistleblowing@globalswitch.com), which is available to all stakeholders, including suppliers and subcontracted workers. The channel is accessible in all operating languages and is governed by a strict non-retaliation policy, as outlined in the Supplier Code of Conduct.

Suppliers are also expected to establish their own internal grievance mechanisms and to take appropriate corrective action when breaches occur. Where a supplier is found to have violated the SCoC, Global Switch reserves the right to take remediation steps, including escalation, corrective measures, or contract termination.

Broader remediation procedures are addressed through the company's Sustainability Due Diligence (SDD) framework (see Section Our Sustainability Due Diligence Framework), which includes internal oversight by Legal, ESG and Procurement functions.



S2-4 TAKING ACTION ON MATERIAL IMPACTS AND MANAGING RISKS AND OPPORTUNITIES

(S2-4, GRI 2-26, 414-2, SASB TC0203-20)

In 2024, Global Switch conducted a one-off ESG Risk and certification analysis of its top 100 suppliers, representing approximately 86% of total supplier expenditure.

This assessment supported the company's Double Materiality Assessment by identifying areas of concentrated upstream Risk and evaluating supplier alignment with key sustainability standards.

Suppliers were manually tagged based on their service category and Risk exposure. Labour rights Risks were assessed for suppliers operating in sectors where workforce-intensive activities are common, such as construction, facilities management, engineering, and security.

Among suppliers flagged for Labour Rights Risk:

64%
of associated supplier spend was with companies that have a Human Rights Policy or Certification

85%
of associated supplier spend was with companies certified to ISO 45001, indicating strong occupational health and safety management systems

Among Materials and Equipment suppliers:

79%
had a Science-Based Target (SBT) commitment or target

72%
were certified under ISO 14001, reflecting adoption of environmental management systems

While the 2024 analysis was conducted as a standalone assessment to inform the Double Materiality process, it provided valuable insight into supplier maturity and areas of Risk concentration. Although it did not yet trigger changes to sourcing decisions or formal follow-up actions, the results have strengthened internal awareness and are being used to shape the scope of Global Switch's evolving Responsible Supply Chain strategy.

Currently, new suppliers are not subject to the same level of ESG screening or certification review. However, Global Switch is actively exploring how to integrate such assessments into future procurement workflows as part of its strategic roadmap. These developments aim to ensure greater consistency in identifying, managing, and mitigating labour-related Risks across the upstream value chain.

S2-5 TARGETS RELATED TO MANAGING MATERIAL IROS

(S2-5, GRI 3-3(d), 414-1, SASB TC0203-20)

As of the end of 2024, Global Switch had not established formal targets related to value chain workers. No quantitative or time-bound targets have been set for managing negative or positive labour-related Impacts, or for improving supplier performance on social due diligence.

The current approach is focused on the use of reputable suppliers, policy deployment via the Supplier Code of Conduct, and progressive alignment with international standards. Target development will form part of the forthcoming Responsible Supply Chain strategy and is expected to improve tracking, transparency, and measurable performance over time.

§ ACCOUNTING PRINCIPLES

The ESG Risk and certification analysis covered Global Switch's top 100 suppliers by spend, based on FY2024 financial data. This subset represented approximately 86% of total upstream supplier expenditure and was selected to ensure high relevance and Impact coverage. Labour rights Risk tagging was performed manually using supplier industry profiles, service categories, and exposure to workforce-related Risks such as working conditions and health and safety.

Certification data (e.g. ISO 45001, ISO 14001, Human Rights Policies) was collected from publicly available sources and verified through supplier websites, sustainability reports, or official certification registries. Percentages are calculated by weighting certification status by supplier spend within the relevant Risk-tagged group (e.g. labour-intensive services or materials suppliers). No third-party audit of certification validity was conducted. The analysis reflects a one-off exercise and is not part of an ongoing supplier monitoring system.

The reporting boundary covers all upstream suppliers under Global Switch's operational control and aligns with the consolidation scope defined in Section About This Report - Basis For Preparation of this report.

S3 AFFECTED COMMUNITIES (VOLUNTARY DISCLOSURE)

(ESRS S3, GRI 413, SASB – Multinational and data centre sector-relevant references)

Although Affected Communities was not identified as a material topic in Global Switch's double materiality assessment, the company recognises the vital importance of maintaining strong, positive relationships with the local communities in which it operates.

Across our global footprint, Global Switch actively supports social integration, climate adaptation, inclusive education, and charitable giving. This voluntary disclosure highlights the initiatives undertaken in 2024 to create meaningful social Impact and support local resilience.

Community Resilience and Climate Adaptation

In **Hong Kong**, Global Switch hosted a hands-on indoor air quality workshop focused on crafting energy-efficient mini air purifiers for vulnerable groups, including low-income families and elderly residents living alone. The devices were distributed in partnership with NGOs such as **Caritas Hong Kong**. This initiative reflects our ongoing commitment to practical, targeted solutions that enhance climate resilience in dense urban environments.

In **Singapore**, Global Switch continued its sponsorship of **Woodlands Constituency events**, supporting underprivileged communities during national celebrations such as **National Day, Deepavali, and Hari Raya**. These efforts promote inclusion, community spirit and wellbeing. Sustainable Smart Campus Competition introduced our company and supported youth-led sustanability projects.

Education, Youth Engagement and Skills Development

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



Singapore

In **Singapore**, we participated in the **Teacher's Work Attachment Programme** in collaboration with the Ministry of Education, hosting quarterly data centre talks and tours for educators. Additionally, we trained four students from the as part of a work-study diploma programme.



Hong Kong

In **Hong Kong**, we engaged with students during the **HKUST Sustainable Smart Campus Competition**, introducing our company and supporting youth-led sustainability projects.



Amsterdam

In **Amsterdam**, we conducted annual tours for 20 students from the **a** as part of a minor in Big Data, and hosted 22 local **residents from the adjacent neighbourhood** for a guided data centre visit to promote transparency and local engagement.



Paris

In **Paris**, we donated refurbished computers to a local **school in Clichy**, and contributed €15,000 to an association supporting families of children with brain injuries.

Charitable Giving and Social Inclusion

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



London
In **London**, employees donated food to the **Richard House Children's Hospice**, and organised **Christmas donation drives** and foodbank collections.



London
At the **London Victoria Corporate Office**, staff hosted **coffee morning fundraisers** in support of charities including McMillan, ChickenShed and the Trussell Trust.



Frankfurt
In **Frankfurt**, we raised funds for **MainLichtBlick e.V.** through a summer party and raffle, helping to fulfill the wishes of children in need. Additional donations supported **Die Tafel** food services and the **Kinder & Jugendhospiz** youth hospice.

Employee Engagement Through Volunteering

Several volunteering initiatives fostered team spirit and community Impact:



Hong Kong
The **Hong Kong Eco-Farm Tour** enabled employees and their families to engage with sustainable agriculture and environmental education.



Hong Kong
The **Mini Christmas Wreath Workshop** in Hong Kong blended creativity with social contribution, with wreaths donated to **Make-A-Wish** for charitable sale.



London
A team of six **London-based employees** successfully climbed **Ben Nevis** in June 2024, raising funds for **Young Minds**, a UK youth mental health charity.

Community Sport and Youth Development

Global Switch is a proud sponsor of **Eintracht Frankfurt**, supporting children's movement, social integration, and community engagement through sport.

Volunteering Participation and Hours

In 2024, Global Switch employees contributed a total of **126 hours of verified volunteering time**, supporting causes including youth mental health, vulnerable families, and environmental adaptation. Based on our end-of-year headcount of 306 employees, this corresponds to an average of **0.41 hours of volunteering per employee**.

126hrs
of verified volunteering time

0.41hrs
of verified volunteering time

While not all volunteering activities are centrally tracked at this time, this figure reflects structured events from Hong Kong and Singapore and demonstrates growing employee engagement in community-focused initiatives. Global Switch plans to enhance visibility and coordination of volunteering efforts across sites in future years.

S4 CUSTOMER, CONSUMERS AND END-USERS

(ESRS S4-SBM3, S4-1 to S4-5; GRI 416-1, 418-1; SASB TC0203-03, TC0203-04)

S4-SBM3 MATERIAL IROS, POLICIES AND ACTIONS

(ESRS S4-SBM3, GRI 416-1, 418-1, SASB TC0203-03)

Global Switch provides mission-critical infrastructure services to cloud providers, enterprises, and connectivity platforms. Although the company'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.

The 2024 Double Materiality Assessment (see relevant section) identified two material downstream Risks:

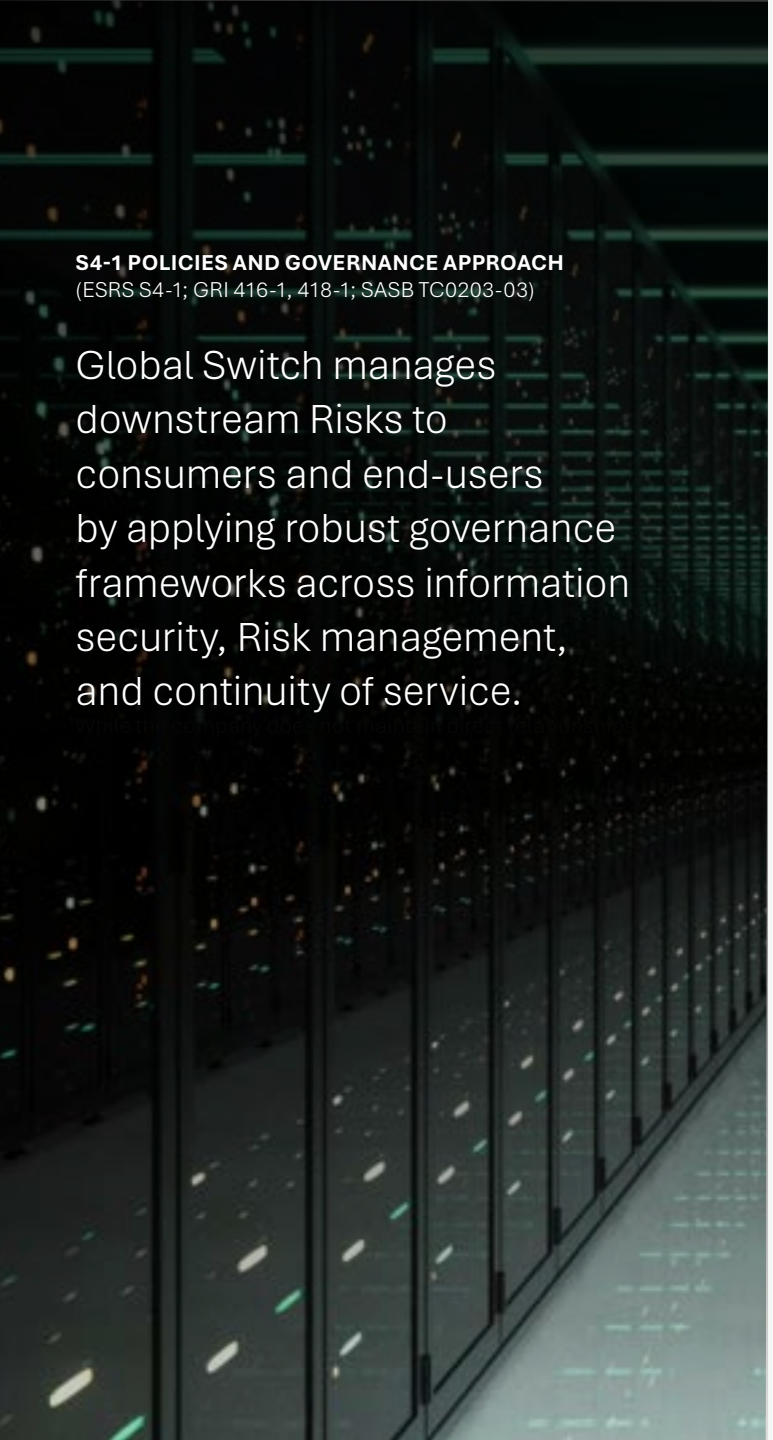
- **Customer and end-user privacy**: Risk of reputational or legal Impact from a data privacy breach occurring through customer-managed platforms hosted in Global Switch facilities.
- **Personal safety of consumers and end-users**: Risk that disruption to hosted customer services could negatively affect end-users, particularly in critical service sectors.

These Risks apply downstream of Global Switch's operational boundary, but their materiality stems from the Group's role in maintaining the **resilience, security, and continuity of digital infrastructure** that supports essential services. Stakeholders affected include digital consumers, patients, financial service users, and those interacting with government or emergency platforms supported by customers.

A summary of material IROs, business responses, and implementation status is provided below.

Consolidated Table: Material IROs, Policies and Actions

IRO SUBTOPIC	MATERIAL IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN LOCATION	TIME HORIZON	BUSINESS ACTION(S)	KEY POLICIES	STATUS / NOTES
Customer and end-user privacy	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	2024 / 2025–30 / 2031+	ISO 27001-certified ISMS; physical and logical access controls; annual penetration testing; DPIA where relevant	Information Security Policy, Data Privacy Policy, DPIA Policy, ISO 27001 certification	In place and externally certified
Access to information and personal safety of consumers and/or end-users	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	2024 / 2025–30 / 2031+	Critical Environments Programme (CEP); N+1 or greater redundancy; Business Continuity Planning; Risk monitoring and incident reporting	Risk Management Policy, CEP Standards Manual, Incident Escalation Procedure, SLA frameworks	Formalised, operational controls in place



S4-1 POLICIES AND GOVERNANCE APPROACH
(ESRS S4-1; GRI 416-1, 418-1; SASB TC0203-03)

Global Switch manages downstream Risks to consumers and end-users by applying robust governance frameworks across information security, Risk management, and continuity of service.

While the company does not maintain direct relationships with end-users, it recognises its enabling role in delivering services that may affect consumer rights, privacy, and safety, particularly when hosting infrastructure for healthcare, financial, or emergency-service platforms.

The company's **Information Security Management System (ISMS)** is fully certified to **ISO 27001**, covering all data centre sites. Supporting policies include the **Information Security Policy, Data Privacy Policy**, and **Data Protection Impact Assessment (DPIA) Policy**, all of which are consistent with the requirements of the **General Data Protection Regulation (GDPR)** and aligned with internationally recognised instruments, including the **UN Guiding Principles on Business and Human Rights (UNGPs)** and the **OECD Guidelines for Multinational Enterprises**. These commitments are described in full in Section Our Sustainability Due Diligence Framework and apply across all operations and relationships, including indirect value chain Impacts.

Customer-facing Risk management is governed by the **Risk Management Policy** and the **Critical Environments Programme (CEP)**, which sets minimum resilience standards for infrastructure. These measures are designed to prevent outages that could affect health- or safety-critical end-users. While no formal human rights Risk assessments are carried out on consumers themselves, the Group performs **Data Protection Impact Assessments (DPIAs)** where infrastructure is used in a way that may pose elevated downstream privacy risk. In 2024, there were no substantiated privacy breaches or continuity incidents that Impacted end-users.

Engagement with consumers or the general public does not occur directly, given the company's B2B business model. However, Global Switch engages actively with customers, particularly those operating in sensitive sectors on ESG due diligence and compliance matters. This includes responding to privacy and security questionnaires, reviewing Service Level Agreement (SLA) expectations, and disclosing ISO certification details. These engagements indirectly surface end-user expectations and shape operational practices.

Customer ESG expectations, particularly in areas such as renewable energy sourcing, diversity and inclusion, and digital infrastructure resilience are actively incorporated into operational policies, facility design specifications, and stakeholder risk governance frameworks.

No significant changes were made to the policies or governance structure related to consumers and end-users during the reporting year. Policies are communicated to customers through onboarding documentation, contractual disclosures, and ESG responses. Internal policies are accessible in all operating languages via the company intranet. While policies are not communicated directly to consumers or the public, all hosting customers are made aware of their obligations and responsibilities through Global Switch's standard governance and operational procedures.

S4-2 CUSTOMER ENGAGEMENT ON CONSUMER AND END-USER RISKS

(ESRS S4-2; GRI 416-1, 418-1; SASB TC0203-03)

Global Switch does not maintain direct engagement mechanisms with consumers or end-users, as it operates exclusively under a business-to-business (B2B) model.

However, the company recognises that its colocation services indirectly enable digital platforms used by millions of individuals, including in safety-critical and regulated sectors. Accordingly, the perspectives and expectations of consumers and end-users are considered through the lens of customer engagement and operational Risk governance.

Engagement occurs indirectly via Global Switch's commercial customers, who act as legitimate proxies for downstream users. These customers often represent the interests of their own end-users during contractual negotiations, due diligence processes, and ongoing operational reviews. In 2024, the company responded to a wide range of customer questionnaires and audits, including ESG due diligence related to data privacy, uptime, information security, and service continuity. These interactions typically occur during procurement or renewal phases and continue throughout the service relationship via account management and incident reporting channels.

Although there is no formal stakeholder-engagement process focused specifically on end-users, Global Switch gains insight into their potential concerns through:

- ESG and information security questionnaires submitted by hyperscale and regulated customers
- Participation in third-party ESG platforms such as CDP and EcoVadis, which integrate stakeholder expectations
- Industry standards and policy trends, including regulatory shifts related to AI, digital trust, and critical infrastructure

There is currently no standalone internal process for evaluating the effectiveness of consumer- or end-user-facing engagement, as no such engagement is conducted directly. Instead, customer input serves as the channel through which relevant perspectives are gathered and addressed. The ESG Steering Group, chaired by the Chief Operating Officer, holds operational responsibility for ensuring that stakeholder engagement and materiality practices remain aligned with international reporting frameworks. Legal and Operations functions contribute to this oversight.

At present, Global Switch has not adopted a general process to engage directly with consumers or end-users. The company considers the customer-as-intermediary model appropriate given its service scope, operational boundaries, and current Risk exposure. Should regulatory or market expectations evolve, this position will be reviewed. No changes to role responsibility or engagement strategy are scheduled in the current reporting cycle.

Customer ESG Engagement & Perceptions

In 2024, Global Switch enhanced its engagement with customers on ESG topics by conducting two complementary activities:

01 First, the Enterprise Sales, Strategic Accounts and Bid Management teams gathered ongoing customer insights through direct ESG-related discussions with prospective and existing clients. Regular themes raised by customers included:

Climate change adaptation and renewable energy sourcing	PUE and energy-efficiency benchmarking	Water sourcing and WUE	Circular economy practices and responsible waste management
Workforce policies, including work–life balance and gender equity	Health and safety performance	Local community investment initiatives	Corporate culture and industry collaboration via associations

02 Second, a third-party specialist conducted 15 in-depth interviews with senior decision-makers at key customers to assess Global Switch's performance across Product, Performance, People and Planet dimensions. Based on these structured customer interviews, Global Switch management committed to five improvements:

1. A consistent approach to sales and account management
2. Strengthened processes for outage and major incident response
3. A revised contracting framework to enable flexible purchasing
4. Greater transparency on facility operations and growth strategy
5. Reinforcement of a people-first culture

These insights are now actively informing internal initiatives in commercial operations, infrastructure planning, and ESG programme delivery. They also provide stakeholder feedback in support of our materiality validation (see Section on Stakeholder Engagement) and customer-focused Impact management (S4-4).

General Disclosures
Environmental
Social
Governance
Appendices

S4-3 GRIEVANCE AND ESCALATION MECHANISMS

(ESRS S4-3; GRI 416-1, 418-1; SASB TC0203-04)

Global Switch does not maintain direct relationships with consumers or end-users but recognises that its infrastructure enables services that Impact these stakeholders.

As such, the company provides multiple pathways for customers and external parties to raise concerns, particularly in relation to operational continuity, safety, or data privacy.

Customers can raise issues via contractually established escalation channels, which operate 24/7 and are detailed in all service agreements. These channels are managed locally at each site and supported by the Critical Environments Programme (CEP) and the Group's Business Continuity Plans. All issues logged through these processes are escalated based on severity and reviewed by the Executive Committee or project-level governance, as appropriate.

In addition to operational channels, Global Switch maintains a Group-wide Whistleblowing mechanism, accessible to all stakeholders, including external individuals, contractors, or the public. The whistleblowing email address (whistleblowing@globalswitch.com) is available 24/7, in all operating languages, and is governed by strict confidentiality and non-retaliation provisions, as outlined in the Whistleblowing Policy (see Overview of Sustainability-Related Policies table).

While Global Switch does not operate bespoke channels targeted at consumers or end-users (given its B2B model), the whistleblowing mechanism acts as a catch-all route for any party to raise human rights, ethical, or safety-related concerns. Individuals using the channel may submit concerns anonymously, and all submissions are reviewed by Legal and Group HR. There were no substantiated complaints received from consumers or end-users in the reporting period.

The company supports and encourages the use of formal grievance processes through its customers, particularly where downstream users are affected. Where issues are raised indirectly through customer relationships, they are logged and tracked within the applicable operational or Risk-management systems. Customer feedback is also reviewed during ESG assessments, SLA reviews, and post-incident investigations.

At this time, Global Switch does not plan to adopt additional stand-alone channels for end-users, as the existing mechanisms are considered proportionate to its role in the digital infrastructure value chain. No changes to roles or responsibilities are scheduled, and existing processes are monitored by the ESG Steering Group and Group Legal.

In 2024, there were no substantiated complaints relating to consumer safety or data privacy breaches involving infrastructure hosted by Global Switch. See also Section Sustainability Risk & Opportunity Management for grievance management governance.



S4-4 TAKING ACTION ON MATERIAL IMPACTS, AND MANAGING RISKS AND OPPORTUNITIES

(ESRS S4-4, GRI 416-1, 418-1, ASB TC0203-04)

Global Switch's approach to managing Risks and opportunities related to consumers and end-users is focused on the prevention of downstream harm. While the company does not have a direct interface with consumers, its data centre infrastructure enables digital services delivered by customers in sectors such as healthcare, public services, and finance. The company therefore maintains high operational and security standards to ensure that its own services do not contribute to adverse outcomes.

In 2024, Global Switch did not identify any instances in which it caused or contributed to negative Impacts on consumers or end-users. As such, no formal remediation actions were required during the year. Nevertheless, a proactive management approach is maintained to ensure continuity, resilience, and data security across all sites.

Where potential incidents are identified, remediation and corrective action are coordinated through an internal incident management process where all incidents are categorised on the Impact. These incidents follow a structured review and resolution process focused on prevent reoccurrence. All incidents regardless of severity are shared with all key employees including and up to C-Suite. All high severity issues are reviewed by the COO. Where remediation may be required this is coordinated by the COO and the Chief Legal Officer, as appropriate.

Actions in place include the Critical Environments Programme, which mandates redundancy in power and cooling systems, site-specific Business Continuity Plans, 24/7 infrastructure monitoring, and defined emergency escalation protocols. Where incidents or near misses occur, root-cause reviews are conducted, and lessons learned are incorporated into operations.

The company's ISO 27001-certified Information Security Management System (ISMS) includes rigorous controls over access, incident response, data segregation, and auditability. These controls are supported by internal policies on Risk.

S4-5 TARGETS RELATED TO MANAGING IMPACTS ON CONSUMERS AND END-USERS

(ESRS S4-5; GRI 416-1, 418-1)

As a colocation service provider with no direct interface with consumers or end-users, Global Switch does not currently maintain targets that are explicitly framed around downstream users. All existing targets and metrics focus on operational performance, infrastructure resilience, carbon and energy performance, and data security, which indirectly support the protection of consumer rights and wellbeing.

Consequently, no end-users were involved in the definition, tracking or review of targets in 2024. Stakeholder engagement for target-setting focuses on internal teams, customers, and investor expectations, as outlined in Section Stakeholder Engagement. While customer insight may reflect consumer-related concerns, there is no structured mechanism for including end-users in the setting, evaluation or revision of targets.

Given this context, Global Switch does not currently define intended outcomes specific to the lives of consumers or end-users, nor does it monitor comparability or stability of such targets over time. No targets were established in 2024 using consumer-specific standards or frameworks. However, existing operational KPIs, including site uptime, ISO 27001 certification, and zero harm metrics , are maintained to safeguard the integrity and continuity of services used by downstream populations.

The company continues to monitor regulatory and market developments and will revisit the scope of target-setting if future obligations or stakeholder expectations call for more direct measurement of downstream Impacts.

General Disclosures
Environmental
Social
Governance
Appendices

GOVERNANCE

GOVERNANCE

G1 BUSINESS CONDUCT

G1 SBM-3, GOV-1 AND IRO-1 MATERIAL IROS, GOVERNANCE RESPONSIBILITIES, AND RISK OVERSIGHT
(SBM-3, GOV-1, IRO-1, G1-1 to G1-6)

Global Switch's Governance-related sustainability matters were identified through the company's 2024 Double Materiality Assessment, which included internal workshops, peer benchmarking, policy gap analysis, and external stakeholder input from investors, legal advisors, and customers.

Governance issues emerged as a key cross-cutting priority, influencing both trust and resilience across the value chain.

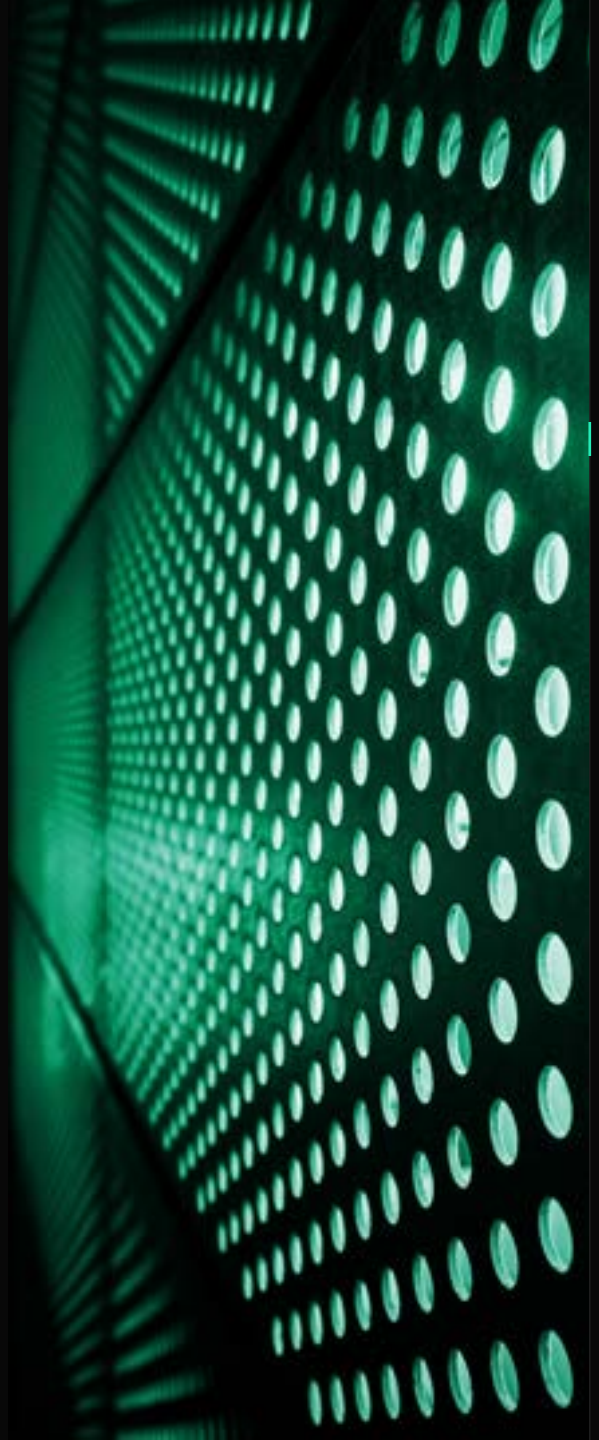
The IROs presented in the table below reflect both **actual and potential Impacts**, as well as **ESG-related business risks**, with a focus on **corporate culture, ethical conduct, supply-chain practices,** and **compliance with anti-bribery and transparency standards**. Their classification and time horizon were determined using the same criteria as for environmental and social matters.

Each IRO is linked to relevant value-chain activities and aligned with the applicable ESRS Governance Disclosure Requirements (GOV-1, GOV-5, G1-1 to G1-6). Implementation is supported by Global Switch's core governance structures, as described in Sections Governance & accountability for sustainability:

- The **Board of Directors** holds ultimate responsibility for sustainability oversight, supported by its sub-committees.
- The **Executive Committee** oversees execution and internal controls.
- The **ESG Steering Group** coordinates cross-functional implementation, including compliance with ethical standards, Risk controls, and policy development.
- Legal and Compliance teams ensure alignment with frameworks such as the OECD Guidelines, the UK Bribery Act, the EU Whistleblower Directive, and evolving CSRD requirements.

Global Switch has also adopted a **Sustainability Due Diligence Framework**, detailed in Section Our Sustainability Due Diligence Framework, which embeds responsible business conduct across operations and the supply chain. In parallel, the company maintains a **Code of Conduct, Whistleblowing Policy**, and **Anti-Bribery and Corruption Policy**, all reviewed in 2024 to ensure alignment with international expectations.

The table below summarises the most material Governance-related IROs, alongside the corresponding business actions and policy measures in place. Each item is mapped to its relevant disclosure requirement for traceability.



Consolidated Table: Governance-Related IROs, Policies, Actions and Targets

IRO SUBTOPIC	MATERIAL IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN LOCATION	TIME HORIZON	BUSINESS ACTION(S)	KEY POLICIES	STATUS / NOTES
Corporate culture	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	Own Operations / Upstream	2024 / 2025–30 / 2031+	Business Code of Conduct; Anti-Corruption training via MetaCompliance	Business Code of Conduct; Anti-Corruption Policy	In place across the Group; Code of Conduct rolled out; training delivered via MetaCompliance; internal briefings conducted
Protection of whistleblowers	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	Own Operations / Upstream	2024 / 2025–30 / 2031+	Whistleblowing mechanism available 24/7 in all languages; non-retaliation policies; training	Whistleblowing Policy; Supplier Code of Conduct (SCoC)	Fully implemented; 24/7 multi-language channel; non-retaliation policy embedded in onboarding and contracts
Management of relationships with suppliers including payment practices	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	2024 / 2025–30	Supplier Code of Conduct; supplier screening; contractual obligations	SCoC	Supplier Code of Conduct in place; supplier-screening being expanded in line with Responsible Supply Chain strategy
Management of relationships with suppliers including payment practices	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	2024 / 2025–30	Payment policy with standard terms and escalation	SCoC; Payment Policy	Supplier Payment Policy in place; further alignment with fair payment guidance under review
Reporting	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	2024 / 2025–30	Annual ESG Report, CDP, EcoVadis participation	ESG Target commitment for annual reporting	ESG reporting fully implemented; CDP and EcoVadis submissions annual; mapped to ESRS and GRI
Memberships / associations	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	2024 / 2025–30	Active membership in ESG and industry associations	Various memberships	In place; participation in industry ESG bodies such as the Climate Neutral Data Centre Pact; benefits include policy learning and collaboration

Consolidated Table: Governance-Related IROs, Policies, Actions and Targets

IRO SUBTOPIC	MATERIAL IRO DESCRIPTION	CLASSIFICATION	VALUE CHAIN LOCATION	TIME HORIZON	BUSINESS ACTION(S)	KEY POLICIES	STATUS / NOTES
Protection of whistleblowers (as Risk)	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	Own Ops / Upstream / Downstream	2024 / 2025–30 / 2031+	COO and CLO oversight of incidents; continuous policy update	Whistleblowing Policy; SCoC	Mechanisms in place and monitored by COO and CLO
Management of relationships with suppliers on ESG matters	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	2024 / 2025–30 / 2031+	Supplier Code of Conduct and ESG clauses in contracts	SCoC; contract ESG requirements (e.g. BREEAM / LEED)	Partially implemented; contractual clauses in place; 2024 assessment covered top 100 suppliers; further integration into procurement workflow ongoing
Anti-corruption and bribery	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	Own Ops / Upstream	2024 / 2025–30 / 2031+	MetaCompliance training; legal review processes	Anti-Bribery & Corruption Policy	Policy in place; training mandatory via MetaCompliance; business functions to undergo corruption Risk assessment by 2026

G1-1 BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE

(G1-1; GRI 2-23, 2-24, 2-26; SASB TC0203-20)

Global Switch recognises that fostering a strong, transparent, and ethical culture is fundamental to long-term resilience, regulatory compliance, and stakeholder trust.

The company has 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.

Code of Conduct and Ethical Expectations

The Group-wide **Code of Conduct**, approved by the Board of Directors and updated in 2024, sets out clear standards for behaviour, including:

- Integrity in business dealings
- Prohibition of corruption, bribery, and fraud
- Respect for human rights and labour protections
- Confidentiality and data protection
- Avoidance of conflicts of interest

The Code applies to all employees, contractors, and Directors across Global Switch's operations and is available in multiple languages. It is integrated into employment contracts and reinforced through onboarding, mandatory annual compliance training (via MetaCompliance), and site-level refreshers.

Embedding Culture Across the Business

Global Switch embeds ethical conduct through both formal systems and culture-building mechanisms:

- **Onboarding and mandatory training**: All new hires are trained on the Code of Conduct and other key policies (e.g. anti-harassment, anti-bribery, whistleblowing).
- **MetaCompliance platform**: Used to track policy dissemination and test employee understanding.
- **Leadership communication**: Board members and Executives regularly reinforce values-based decision-making and set the tone for ethical leadership.
- **Employee engagement**: Values and conduct expectations are communicated via the intranet (The Switch), workshops, and all-hands briefings.

In 2024, the ESG Steering Group oversaw a compliance refresh across all business functions, and the Board received an ESG regulatory landscape briefing covering evolving expectations under the CSRD and international frameworks.

Business Integrity, Fairness and Transparency

In addition to the Code of Conduct, business conduct is governed by policies addressing:

- **Anti-Bribery and Corruption** – includes rules on gifts and hospitality, third-party due diligence, and incident reporting procedures
- **Whistleblowing** – provides confidential, 24/7 access to whistleblowing@globalswitch.com, in all operating languages, with non-retaliation guarantees
- **Supplier Code of Conduct (SCoC)** – sets expectations for ethical behaviour by all suppliers, including anti-corruption, fair working conditions, and environmental compliance

These policies are accessible via the company portal (The Switch) and align with key standards including the OECD Guidelines for Multinational Enterprises, the UN Global Compact, and the UK Bribery Act.

Oversight and Continuous Improvement

Oversight of business conduct policies rests with the Board of Directors, supported by the Legal team. The Chief Legal Officer and COO jointly oversee policy enforcement and Risk escalation.

Global Switch did not identify any breaches of its Code of Conduct in 2024. However, the company recognises that ethical culture is a continuous journey. In 2025, the business will explore enhancements to:

- Ethical decision-making tools and reporting channels
- Due diligence of third-party partners
- Targeted ethical leadership development

This approach reflects Global Switch's commitment to building a values-driven, legally compliant, and socially responsible organisation.

G1-2 MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

(G1-2; GRI 2-6, 2-17, 2-25; SASB TC0203-20)

Global Switch's supplier relationships are governed by a structured procurement approach that emphasises ethical conduct, contractual clarity, and ESG performance expectations.

The company 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 company's global portfolio.

Supplier Code of Conduct and ESG Expectations

All suppliers are expected to comply with the Group's Supplier Code of Conduct (SCoC), which sets standards for:

- Human rights and labour conditions
- Occupational health and safety
- Environmental stewardship and climate mitigation
- Ethical conduct and anti-corruption
- Data privacy and protection

The SCoC is written to align with international frameworks such as the UN Guiding Principles on Business and Human Rights, ILO Core Conventions, and the OECD Guidelines for Multinational Enterprises. The Code sets clear expectations for fair conduct and compliance with relevant laws, including those relating to payment terms and business integrity.

Supply Chain Screening and Risk Management

In 2024, Global Switch conducted a dedicated ESG and certification review of its top 100 suppliers, representing the vast majority of total procurement spend. The analysis assessed ESG maturity across five key domains:

- **Science-Based Targets:** 66% of supplier spend is with companies that have approved or committed to science-based climate targets aligned with the Paris Agreement
- **Environmental management:** 75% of spend is with suppliers certified to **ISO 14001**, demonstrating mature environmental systems
- **Occupational health and safety:** 74% of spend is with suppliers certified to **ISO 45001**, ensuring strong H&S Risk management
- **Human rights:** 70% of spend is with suppliers that have an explicit **Human Rights Policy or certification**
- **Information security:** 58% of spend is with suppliers certified to **ISO 27001**, reflecting robust cybersecurity practices

In parallel, among suppliers flagged for Labour Rights Risk, 64% of associated spend was with suppliers that had a Human Rights Policy or certification, and 85% with ISO 45001 certification. This dual-layer analysis supports Global Switch's understanding of ESG maturity within its supplier base and informs the prioritisation of actions under its developing Responsible Supply Chain strategy.

Procurement Governance and Oversight

Supplier selection and contract management are overseen by the Group Procurement Director and the Legal team, under the leadership of the COO. The ESG Steering Group reviews supplier-related ESG Risks, particularly where they intersect with compliance obligations or reputational concerns.

Where elevated Risks are identified (e.g. subcontractor H&S incidents, forced labour indicators), issues are escalated to senior management, and remediation actions may be triggered. To date, no sourcing decisions have been terminated due to ESG non-compliance; however, further work is planned to refine supplier evaluation frameworks and ensure ESG expectations are consistently integrated.

G1-3 PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

(G1-3; GRI 205-1, 205-2, 205-3; SASB TC0203-20)

Global Switch is committed to operating with integrity, fairness and full compliance with anti-corruption laws across all jurisdictions in which it operates. The company prohibits all forms of bribery, corruption, facilitation payments, and abuse of entrusted power, whether direct or indirect, through its operations or supply chain.

Anti-Corruption Policy and Governance

The company'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. The policy is aligned with the UK Bribery Act, OECD Guidelines, and the UN Global Compact.

This policy is published on the company's **MetaCompliance training portal**, embedded in the onboarding process for all employees, and is accessible via the company intranet (The Switch). It is also disclosed to suppliers through tender documentation and supplier onboarding materials.

The policy applies to:

- All permanent and contract staff
- Board members and senior executives
- Third-party suppliers and contractors (via the Supplier Code of Conduct)

Serious concerns or potential breaches may be escalated through line management, the Legal team, or via the company's dedicated **whistleblowing channel** (see G1-1). Where warranted, issues are reported to the COO and the CLO.

However, Global Switch does not currently maintain a stand-alone investigation protocol or procedure for managing corruption-related incidents. This gap has been identified and will be addressed as part of the next compliance review cycle, with procedures targeted for development by 2026.

Training and Communication

Anti-corruption awareness is reinforced through mandatory training:

- **100% of employees and Directors** completed MetaCompliance anti-bribery training in 2024
- Training is required at **onboarding** and refreshed **annually**
- Content covers bribery definitions, red flags, third-party Risks, and escalation routes

This training is standardised across all functions and geographies. While no functional Risk mapping or regional training analysis has been conducted to date, Global Switch applies a universal training requirement to ensure full coverage, including functions such as Procurement, Legal, and Customer Contracting.

The training programme is overseen by the Legal and Compliance team, with compliance tracked through the MetaCompliance system. Board members and the Executive Committee are included in the annual training cycle, and coverage is monitored by the ESG Steering Group.

Compliance Training Coverage

Mandatory anti-bribery training was delivered via the MetaCompliance system in 2024. The percentage of employees who completed the training by geography was:

- **UK, Germany, Spain, Hong Kong**: 100%
- **Netherlands**: 93%
- **Singapore**: 90%
- **France**: 70% (completion expected to increase in 2025)

Training is required at onboarding and refreshed annually.
It is tracked centrally by the Legal and HR functions and reported to the ESG Steering Group.

Oversight and Next Steps

The Chief Legal Officer is responsible for the maintenance of the Anti-Bribery and Corruption Policy and its enforcement across the organisation. In parallel, the ESG Steering Group monitors external developments and peer practices to ensure the company's approach remains aligned with regulatory and stakeholder expectations.

In 2025–2026, Global Switch will:

- Review the policy content and update it for evolving global standards
- Develop formal investigation protocols, including role separation
- Evaluate whether function-specific or regional training enhancements are needed

These measures will strengthen the company's overall control environment and provide additional confidence to internal and external stakeholders that corruption Risks are being effectively prevented and addressed.

G1-4 INCIDENTS OF CORRUPTION OR BRIBERY

(G1-4; GRI 205-3; SASB TC0203-20)

Global Switch tracks and discloses any incidents of corruption or bribery across its operations, including violations involving employees, business partners, or third-party legal action. The Legal and Compliance teams are responsible for investigating concerns and maintaining records in line with applicable anti-corruption laws.

2024 Incident Reporting Summary

METRIC	2024 VALUE	NOTES
Number of convictions for violations of anti-corruption or anti-bribery laws	0	No legal convictions recorded globally
Total fines imposed for violations	0	No financial penalties incurred
Confirmed incidents of corruption or bribery	0	No internal or external cases reported or substantiated
Number of incidents involving own workers (dismissals, disciplinary action)	0	No personnel actions required
Contracts with business partners terminated or not renewed due to corruption	0	No contract decisions taken due to corruption concerns

G1-5 POLITICAL INFLUENCE AND LOBBYING ACTIVITIES

(G1-5; GRI 415-1, 2-28; SASB TC0203-09)

Global Switch does not engage in direct political contributions, political lobbying activities, or financing of political parties. The company maintains a strict position of neutrality with respect to political processes and refrains from influencing public policy through donations or advocacy campaigns.

Political Contributions and Lobbying

In 2024:

- **No financial contributions** were made to political parties, candidates, or electoral campaigns in any jurisdiction
- **No payments or contracts** were issued to professional lobbyists, advocacy consultants, or public affairs firms
- **No corporate memberships** were held in politically affiliated organisations or think tanks

The company does not currently operate in a regulatory environment that requires direct lobbying. However, Global Switch recognises the importance of transparent public positioning and regulatory readiness, particularly in the context of evolving climate, cybersecurity, and human rights legislation. Where relevant, Global Switch contributes to industry-level dialogue through recognised sectoral organisations (e.g. trade associations and environmental certification platforms), but these engagements are strictly technical or compliance-focused in nature and not considered political lobbying under applicable legal definitions.

Policy and Governance

Global Switch's **Code of Conduct** prohibits the use of company funds or assets for political purposes and sets clear expectations for employee conduct in relation to political activity. All employees are required to comply with local laws and internal expectations regarding political neutrality and public representation.

Any potential future activity related to public policy engagement will be reviewed by the Legal team and subject to Board oversight. As of the end of the 2024 reporting period, **no such engagements or expenditures have occurred**.

G1-6 PAYMENT PRACTICES

G1-6; GRI 204-1; SASB TC0203-07

Global Switch is committed to ensuring that its suppliers are paid in a timely and transparent manner. The Group applies standard payment processes and controls across all sites, as outlined in the company's Purchase Order, Receipting and Invoicing Policy, which governs supplier onboarding, PO generation, invoicing, and payment processing.

Key Metrics for 2024

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

Standard Payment Terms and Process

Global Switch's standard supplier payment terms are embedded in its policy and are defined at the supplier onboarding and contract negotiation stage. These terms are communicated to suppliers via ServiceNow and VendorCafe during onboarding, and are reinforced through:

- Inclusion in contract and purchase order (PO) documentation
- Verification of supplier details and bank information
- A structured workflow for invoice approval and receipting, using a three-way match (PO, receipt, invoice)

The Accounts Payable process includes payment runs at least twice a month (mid and end of month), dual-level approval, and prioritisation rules for urgent payments and exceptional circumstances. Suppliers are required to quote PO numbers on all invoices to ensure timely processing.

Systems and Controls

Payments are processed through **Yardi Voyager**.
Controls include:

- Segregation of duties between PO requestors/receivers, and payment approvers
- Enforcement of the Delegation of Authority (DoA) matrix
- Monthly vendor reconciliation when provided
- Regular training of business users and finance staff on PO and invoicing standards

A comprehensive audit trail is maintained through Yardi and email correspondence for all payment approvals, ensuring traceability and compliance.

Compliance and Oversight

No legal proceedings for late payments were recorded in 2024. The company is currently reviewing how to increase the percentage of payments made in line with standard terms, with a focus on early PO issuance and business unit adherence to receipting protocols.

§ ACCOUNTING PRINCIPLES

The average number of payment days (33) was calculated as the mean number of calendar days between the contractual or statutory due date and the actual payment date, based on invoice-level records in the Yardi Voyager system. The percentage of payments aligned with standard payment terms (54%) represents the share of supplier payments processed within the defined due date specified in the purchase order or contract. Variances from terms may occur due to delays in receipting, incomplete documentation, or operational processing issues. All figures reflect actual accounts payable data extracted from the company's enterprise systems and reviewed by Finance. No estimation techniques or extrapolations were used in reporting these values.

APPENDICES

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GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
GRI 2: General disclosures	
2-1 Organisational details	Legal name and ownership, Corporate office
2-2 Entities included in the organisational's sustainability reporting	Consolidation boundary
2-3 Reporting period, frequency and contact point	Reporting scope and period, Contact point
2-4 Restatements of information	Comparability with prior reporting
2-5 External assurance	External assurance
2-6 Activities, value chain and other business relationships	Operating footprint (end - 2024), Core services, Customer segmentation (end-2024), Business Model & Sustainable Value Creation
2-7 Employees	Workforce, S1-6 and S1-7 Characteristics of Employees and Non-Employees
2-8 Workers who are not employees	S1-6 and S1-7 Characteristics of Employees and Non-Employees
2-9 Governance structure and composition	Governance & accountability for sustainability
2-10 Nomination and selection of the highest governance body	Governance structure and oversight of sustainability matters

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GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
2-11 Chair of the highest governance body	Governance structure and oversight of sustainability matters
2-12 Role of the highest governance body in overseeing the management of impacts	Governance structure and oversight of sustainability matters
2-13 Delegation of responsibility for managing impacts	Management's role in sustainability governance
2-14 Role of the highest governance body in sustainability reporting	Governance structure and oversight of sustainability matters, Internal control, risk management & assurance of sustainability data
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 Company'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	Critical business concerns are reported via the various departmental reporting structures up to the Executive committee of the Company, comprising senior members of the Company's C-suite (CEO, CC, CFO, CLO , CCO and CDO, as well as Group regional Directors for EMEA and Asia Pacific). If and to the extent that these concerns are required to be communicated to the Board of the Company, they will be communicated either through a Board paper or briefing note and will be further discussed by the Board.
2-17 Collective knowledge of the highest governance body	Governance structure and oversight of sustainability matters
2-18 Evaluation of the performance of the highest governance body	Governance structure and oversight of sustainability matters
2-19 Remuneration policies	Integration of sustainability into incentive schemes
2-20 Process to determine remuneration	Integration of sustainability into incentive schemes, S1-16 Remuneration Metrics

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
2-21 Annual total compensation ratio	S1-16 Remuneration Metrics
2-22 Statement on sustainable development strategy	Letter from the CEO and the COO
2-23 Policy commitments	Internal control, risk management & assurance of sustainability data, Sustainability Due-Diligence process and Human Rights commitments , Precautionary principle, G1-1 Business Conduct Policies and Corporate Culture
2-24 Embedding policy commitments	Internal control, risk management & assurance of sustainability data, G1-1 Business Conduct Policies and Corporate Culture
2-25 Processes to remediate negative impacts	Internal control, risk management & assurance of sustainability data, Sustainability Due-Diligence process and Human Rights commitments , G1-1 Business Conduct Policies and Corporate Culture
2-26 Mechanisms for seeking advice and raising concerns	Internal control, risk management & assurance of sustainability data, Sustainability Due-Diligence process and Human Rights commitments, Grievance & remediation mechanisms
2-27 Compliance with laws and regulations	Internal control, risk management & assurance of sustainability data
2-28 Membership associations	Memberships and Voluntary Commitments
2-29 Approach to stakeholder engagement	Stakeholder Engagement
2-30 Collective bargaining agreements	S1 SBM-3 and S1-1 to S1-5: Material IROs, Policies, Engagement, Actions and Targets , S1-8 Collective Bargaining coverage and Social Dialogue

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GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
GRI 3: Material topics	
3-1 Process to determine material topics	Double Materiality Assessment
3-2 List of material topics	Results: List of Material Topics
GRI 201: Economic performance	
3-3 Management of material topics	Sustainability Risk & Opportunity Management, ESG Targets and 2024 Progress, External ESG Ratings and Voluntary Disclosures, Overview of Sustainability-Related Policies
201-1 Direct economic value generated and distributed	Metric Amount (currency) £'m Direct economic value generated Revenues 436.6 Other income 100.9 Economic value distributed Operating costs -195.8 Employee wages and benefits -32.2 Payments to providers of capital -43.6 Payments to government -14.3 Community investments -0.0 Economic value retained 251.6
201-2 Financial implications and other risks and opportunities due to climate change	E1-Climate Change, E1.SBM-3, E1.IRO-1, E1-9 - Resilience of the Strategy and Financial Effect in Business Model, E1-1 – Transition Plan for Climate Change Mitigation, E1-2, E1-3 and E1-4 Climate Policies, Actions and Targets
201-3 Defined benefit plan obligations and other retirement plans	We offer statutory pension schemes to all employees globally. Please refer to the company annual accounts report for more information.

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GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
201-4 Financial assistance received from government	No amounts are received from the governement except for rebates the data centres receive in certain juristictions based on the energy efficiency they achieve.
GRI 202: Market presence	
3-3 Management of material topics	S1-10 and S1-11 Wages and Social Protection
202-1 Ratios of standard entry level wage by gender compared to local minimum wage	S1-10 and S1-11 Wages and Social Protection
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).
GRI 203: Indirect economic impacts	
3-3 Management of material topics	S3 Affected Communities
203-1 Infrastructure investments and services supported	S3 Affected Communities
203-2 Significant indirect economic impacts	S3 Affected Communities
GRI 204: Procurement practices	
3-3 Management of material topics	G1-6 Payment Practices

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GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
204-1 Proportion of spending on local suppliers	Not currently consistently recorded across the Group.
GRI 205: Anti-corruption	
3-3 Management of material topics	G1 SBM-3, GOV-1 and IRO-1 Material IROs, Governance Responsibilities, and Risk Oversight
205-1 Operations assessed for risks related to corruption	G1-3 Prevention and Detection of Corruption and Bribery
205-2 Communication and training about anti-corruption policies and procedures	G1-3 Prevention and Detection of Corruption and Bribery, G1-2 Management of Relationships with Suppliers
205-3 Confirmed incidents of corruption and actions taken	G1-4 Incidents of Corruption or Bribery
GRI 206: Anti-competitive behavior	
3-3 Management of material topics	G1 SBM-3, GOV-1 and IRO-1 Material IROs, Governance Responsibilities, and Risk Oversight
206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	None
GRI 207: Tax	
3-3 Management of material topics	N/A - Not deemed material in current assessment

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
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
GRI 301: Materials	
3-3 Management of material topics	E5-IROs, E5-1 to E5-3 Resource use and Circular Economy Policies, Actions, and Targets
303-1 Materials used by weight or volume	E5-4 – Resource inflows
303-2 Recycled input materials used	E5-4 – Resource inflows
303-3 Recycled input materials used	E5-4 – Resource inflows
GRI 302: Energy	
3-3 Management of material topics	E1.SBM-3, E1.IRO-1, E1-9 – Climate IROS, Strategy, Resilience and Financial Effect in Business Model, E1-1 – Transition Plan for Climate Change Mitigation, E1-2, E1-3 and E1-4 Climate Policies, Actions and Targets

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
302-1 Energy Consumption within the Organisation	E1-5 Energy Consumption, PUE and metering
302-2 Energy consumption outside of the Organisation	Not currently measured
302-3 Energy intensity	E1-5 Energy Consumption, PUE and metering
302-4 Reduction of energy consumption	E1-5 Energy Consumption, PUE and metering
302-5 Reductions in energy requirements of products and services	E1-5 Energy Consumption, PUE and metering
GRI 303: Water and effluents	
3-3 Management of material topics	E3 - IROs, E3-1, E3-2 and E3-3 Water Policies, Actions and Targets
303-1 Interactions with water as a shared resource	E3 - IROs, E3-1, E3-2 and E3-3 Water Policies, Actions and Targets
303-2 Management of water discharge-related impacts	E3 - IROs, E3-1, E3-2 and E3-3 Water Policies, Actions and Targets
303-3 Water withdrawal	E3-4 Water Withdrawals, Discharges and WUE
303-4 Water discharge	E3-4 Water Withdrawals, Discharges and WUE
303-5 Water consumption	E3-4 Water Withdrawals, Discharges and WUE

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
GRI 304: Biodiversity	
3-3 Management of material topics	N/A - Not deemed material in current assessment
304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	N/A - Not deemed material in current assessment
304-2 Significant impacts of activities, products and services on biodiversity	N/A - Not deemed material in current assessment
304-3 Habitats protected or restored	N/A - Not deemed material in current assessment
304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	N/A - Not deemed material in current assessment
GRI 305: Carbon Emissions	
3-3 Management of material topics	E1.SBM-3, E1.IRO-1, E1-9 – Climate IROS, Strategy, Resilience and Financial Effect in Business Model, E1-1 – Transition Plan for Climate Change Mitigation, E1-2, E1-3 and E1-4 Climate Policies, Actions and Targets
305-1 Direct (Scope 1) GHG emissions	E1-6 GHG Emissions
305-2 Energy indirect (Scope 2) GHG emissions	E1-6 GHG Emissions

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
305-3 Other indirect (Scope 3) GHG emissions	E1-6 GHG Emissions
305-4 GHG emissions intensity	E1-6 GHG Emissions
305-5 Reduction of GHG emissions	E1-6 GHG Emissions
305-6 Emissions of ozone-depleting substances (ODS)	E1-6 GHG Emissions
305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	E1-6 GHG Emissions
GRI 306: Waste	
3-3 Management of material topics	E5-IROs, E5-1 to E5-3 Resource use and Circular Economy Policies, Actions, and Targets
306-1 Waste generation and significant waste-related impacts	E5-IROs, E5-1 to E5-3 Resource use and Circular Economy Policies, Actions, and Targets
306-2 Management of significant waste-related impacts	E5-5 Resource outflows and end of life waste
306-3 Waste generated	E5-5 Resource outflows and end of life waste
306-4 Waste diverted from disposal	E5-5 Resource outflows and end of life waste
306-5 Waste directed to disposal	E5-5 Resource outflows and end of life waste

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
GRI 308: Supplier environmental assessment	
3-3 Management of material topics	G1-2 Management of Relationships with Suppliers
308-1 New suppliers that were screened using environmental criteria	G1-2 Management of Relationships with Suppliers
308-2 Negative environmental impacts in the supply chain and actions taken	G1-2 Management of Relationships with Suppliers
GRI 401: Employment	
3-3 Management of material topics	S1 SBM-3 and S1-1 to S1-5: Material IROs, Policies, Engagement, Actions and Targets
401-1 New employee hires and employee turnover	S1-6 and S1-7 Characteristics of Employees and Non-Employees
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	S1-10 and S1-11 Wages and Social Protection
401-3 Parental leave	S1-15 Work-life Balance Metrics
GRI 402: Labour/management relations	
3-3 Management of material topics	S1 SBM-3 and S1-1 to S1-5: Material IROs, Policies, Engagement, Actions and Targets

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
402-1 Minimum notice periods regarding operational changes	S1-6 and S1-7 Characteristics of Employees and Non-Employees
GRI 403: Occupational health and safety	
3-3 Management of material topics	S1-14 Health and Wellbeing
403-1 Occupational health and safety management system	S1-14 Health and Wellbeing
403-2 Hazard identification, risk assessment, and incident investigation	S1-14 Health and Wellbeing
403-3 Occupational health services	S1-14 Health and Wellbeing
403-4 Worker participation, consultation, and communication on occupational health and safety	S1-14 Health and Wellbeing
403-5 Worker training on occupational health and safety	S1-14 Health and Wellbeing
403-6 Promotion of worker health	S1-14 Health and Wellbeing
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	S1-14 Health and Wellbeing
403-8 Workers covered by an occupational health and safety management system	S1-14 Health and Wellbeing

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
403-9 Work-related injuries	S1-14 Health and Wellbeing
403-10 Work-related ill health	Not currently tracked
GRI 404: Training and education	
3-3 Management of material topics	S1 SBM-3 and S1-1 to S1-5: Material IROs, Policies, Engagement, Actions and Targets
404-1 Average hours of training per year per employee	S1-13 Training and Skills Development
404-2 Programs for upgrading employee skills and transition assistance programs	S1-13 Training and Skills Development
404-3 Percentage of employees receiving regular performance and career development reviews	S1-13 Training and Skills Development
GRI 405: Diversity and equal opportunity	
3-3 Management of material topics	S1 SBM-3 and S1-1 to S1-5: Material IROs, Policies, Engagement, Actions and Targets, S1-9 Diversity and Equal Opportunity
405-1 Diversity of governance bodies and employees	Governance structure and oversight of sustainability matters, S1-9 Diversity and Equal Opportunity
405-2 Ratio of basic salary and remuneration of women to men	S1-16 Remuneration Metrics

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
GRI 406: Non-discrimination	
3-3 Management of material topics	S1 SBM-3 and S1-1 to S1-5: Material IROs, Policies, Engagement, Actions and Targets, S1-9 Diversity and Equal Opportunity
406-1 Incidents of discrimination and corrective actions taken	S1-17 Incidents, complaints and severe human rights impacts
GRI 407: Freedom of association and collective bargaining	
3-3 Management of material topics	S1 SBM-3 and S1-1 to S1-5: Material IROs, Policies, Engagement, Actions and Targets, S2 SBM-3 Material IROs, Policies and Actions
407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	S1-8 Collective Bargaining coverage and Social Dialogue, S2-1 Policies Related to Value Chain Workers, S2-4 Taking Action on Material Impacts and Managing Risks and Opportunities
GRI 408: Child labour	
3-3 Management of material topics	S1 SBM-3 and S1-1 to S1-5: Material IROs, Policies, Engagement, Actions and Targets, S2 SBM-3 Material IROs, Policies and Actions
408-1 Operations and suppliers at significant risk for incidents of child labour	S2-1 Policies Related to Value Chain Workers, S2-4 Taking Action on Material Impacts and Managing Risks and Opportunities
GRI 409: Forced or compulsory labour	
3-3 Management of material topics	S1 SBM-3 and S1-1 to S1-5: Material IROs, Policies, Engagement, Actions and Targets, S2 SBM-3 Material IROs, Policies and Actions

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	S2-1 Policies Related to Value Chain Workers, S2-4 Taking Action on Material Impacts and Managing Risks and Opportunities
GRI 410: Security practices	
3-3 Management of material topics	S1 SBM-3 and S1-1 to S1-5: Material IROs, Policies, Engagement, Actions and Targets, S2 SBM-3 Material IROs, Policies and Actions
410-1 Security personnel trained in human rights policies or procedures	a. N/A b. Training requirements apply to third-party organisations.
GRI 411: Rights of indigenous peoples	
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
GRI 413: Local communities	
3-3 Management of material topics	S3 Affected Communities (Voluntary Disclosure)
413-1 Operations with local community engagement, impact assessments, and development programs	S3 Affected Communities (Voluntary Disclosure)

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
413-2 Operations with significant actual and potential negative impacts on local communities	S3 Affected Communities (Voluntary Disclosure)
GRI 414: Supplier social assessment	
3-3 Management of material topics	G1-2 Management of Relationships with Suppliers
414-1 New suppliers that were screened using social criteria	G1-2 Management of Relationships with Suppliers
414-2 Negative social impacts in the supply chain and actions taken	G1-2 Management of Relationships with Suppliers
GRI 415: Public policy	
3-3 Management of material topics	G1-5 Political Influence and Lobbying Activities
415-1 Political contributions	G1-5 Political Influence and Lobbying Activities
GRI 416: Customer health and safety	
3-3 Management of material topics	S4-SBM3 Material IROs, Policies and Actions, S4-1 Policies and Governance Approach, S4-4 Taking Action on Material Impacts, and Managing Risks and Opportunities, S4-5 Targets Related to Managing Impacts on Consumers and End-users

GRI INDEX

GRI STANDARD	RESPONSE OR LOCATION IN THE REPORT
416-1 Assessment of the health and safety impacts of product and service categories	S4-SBM3 Material IROs, Policies and Actions, S4-1 Policies and Governance Approach, S4-4 Taking Action on Material Impacts, and Managing Risks and Opportunities, S4-5 Targets Related to Managing Impacts on Consumers and End-users
416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	S4-3 Grievance and Escalation Mechanisms
GRI 417: Marketing and labelling	
3-3 Management of material topics	N/A - Not deemed material in current assessment
417-1 Requirements for product and service information and labelling	N/A - Not deemed material in current assessment
417-2 Incidents of non-compliance concerning product and service information and labelling	N/A - Not deemed material in current assessment
417-3 Incidents of non-compliance concerning marketing communications	N/A - Not deemed material in current assessment
GRI 418: Customer privacy	
3-3 Management of material topics	S4-SBM3 Material IROs, Policies and Actions, S4-1 Policies and Governance Approach, S4-4 Taking Action on Material Impacts, and Managing Risks and Opportunities, S4-5 Targets Related to Managing Impacts on Consumers and End-users
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	S4-SBM3 Material IROs, Policies and Actions, S4-1 Policies and Governance Approach, S4-4 Taking Action on Material Impacts, and Managing Risks and Opportunities, S4-5 Targets Related to Managing Impacts on Consumers and End-users

VERIFICATION STATEMENTS

MYCARBON
YOUR SUSTAINABILITY EXPERTS

GHG VERIFICATION STATEMENT: LIMITED ASSURANCE

Reporting Period: 1st January 2024 – 31st December 2024

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 1st January 2024 – 31st December 2024. 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 1st January 2024 – 31st December 2024, 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 CY24 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 & 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 (CO2) equivalence, or tCO2e
- Time Period: 1st January 2024 – 31st December 2024

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 CY24 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 2024 (DEFRA –Department for Environment, Food & Rural Affairs
  - IPCC Emission Factor Database (EFDB) (Intergovernmental Panel on Climate Change)
  - Emissions Factors 2024 (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 CY24
- Sampling of utility records and refrigerant submissions to confirm accuracy of source data into calculations.
- Recalculation of emissions.
- 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.

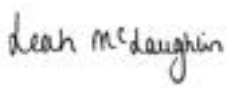
For the CY24 reporting period, we have been provided with sufficient evidence to conclude, with a low level of associated risk, that appropriate Renewable Energy Guarantee of Origin (REGO) certificates align with Global Switch's reported renewable electricity usage. This conclusion is supported by consistent procurement practices observed in previous years and the evidence reviewed during this engagement. To uphold the validity of this limited assurance, final confirmation of REGO certificates should be retained and made available by 1st October 2025.

EMISSIONS SCOPE & CATEGORY	MARKET-BASED EMISSIONS (TCO2E)	LOCATION-BASED EMISSIONS (TCO2E)
Scope 1	3,582.36	3,582.36
Scope 2	51,868.15	264,512.25
TOTAL	**55,450.50**	**268,094.60**

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. Leah McLaughlin

Verified and digitally signed by



Senior Carbon Consultant
MyCarbon
124 City Rd, London, EC1V 2NX
22 July 2025

General Disclosures
Environmental
Social
Governance
Appendices

INDEPENDENT LIMITED ASSURANCE REPORT

To the Stakeholders of Global Switch:

FORLIANCE GmbH ('FORLIANCE' or 'we') was engaged by Global Switch ('GS') to provide limited assurance over specific quantitative data related to GS's greenhouse gas emissions described below for the year ended 31st December 2024.

Assurance Scope

The scope of our work was limited to assurance over the following information (the 'Selected Information') presented in the document 'Project Dashboard – GHG Global Switch 2024':

- Scope 3 emissions (metric tonnes of CO2e): marked-based and location-based
- Scope 3 emissions split out by category (metric tonnes of CO2e): marked-based and location-based, where applicable

The time period covered was 1st January 2024 – 31st December 2024. We have not performed any work, and do not express any conclusion, over any other information that may be included in GS's reports or displayed on GS'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.

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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 engagementcontract between us.

KPIs 2024	VERIFIED AMOUNT MARKET-BASED (IN METRIC TONNES OF CO2e)	VERIFIED AMOUNT LOCATION-BASED (IN METRIC TONNES OF CO2e)
Scope 3 Emissions	**103,523.44**	**152,698.92**
Scope 3.1 Purchased goods and services	11,638.54	11,638.54
Scope 3.2 Capital goods	57,875.38	57,875.38
Scope 3.3 Fuel and energy related activities	32,865.72	82,028.35
Scope 3.5 Waste generated in operations	7.63	7.63
Scope 3.6 Business travel	756.12	756.12
Scope 3.7 Employee commuting	289.98	289.98
Scope 3.8 Upstream leased assets	1.24	1.24
Scope 3.13 Downstream leased assets	88.83	101.68

Verified and digitally signed by

FORLIANCE GmbH

Bonn, August 14th, 2025

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