

Sustainability statement 2024



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1 General Disclosures

1.1 BASIS FOR PREPARATION

This sustainability statement has been prepared in alignment with the European Sustainability Reporting Standards (ESRS) of the Corporate Sustainability Reporting Directive (CSRD). The different chapters of this sustainability statement include the Environmental, Social and Governance topics that were defined as material for LCL during its Double Materiality Assessment (DMA).

Consolidation

We have prepared this sustainability statement on a consolidated basis, following the same principles as the financial statements. It covers three legal entities: LCL NV, LCL Energy, and LCL Wallonia One. We have not exercised the option to omit any information related to intellectual property, knowledge, or innovation results.

This statement considers LCL's value chain, including both upstream and downstream activities associated with material Impacts, Risks and Opportunities (IROs) identified during the DMA. We have adhered to the time horizon definitions set by the ESRS without deviation: the short-term horizon is aligned with the reporting period of LCL's financial statements; the medium-term horizon ranges from the short-term up to five years' time, and the long-term relates to a timeframe of more than five years.

Estimations and uncertainty

No indirect estimations have been included in this report for assessing value chain impacts. However, certain metrics, such as carbon emissions and energy usage, are subject to inherent measurement uncertainties due to data limitations, estimation methodologies, and external influencing factors.

As we are still in the process of reviewing LCL's targets, actions and policies, the resource allocation required to meet these goals remains under development. Consequently, for this sustainability statement, some level of uncertainty persists, and certain capital expenditure (CapEx) and operational expenditure (OpEx) data is not available.

Comparability and changes

This is LCL's first sustainability statement. As such, all targets, metrics, and actions have been carefully designed following the new regulatory requirements and the outcomes of the DMA. The overall structure and design of the information presented has been adapted for this initial report, making it impractical to compare information from prior periods. For the same reason, there are no corrections of errors from previous reporting exercises. This sustainability statement is specifically aligned with CSRD legislation and has not been designed for compliance with other frameworks. No list of the disclosure requirements or specific data points has been incorporated by reference.

GOV-1: The role of the administrative, management and supervisory bodies

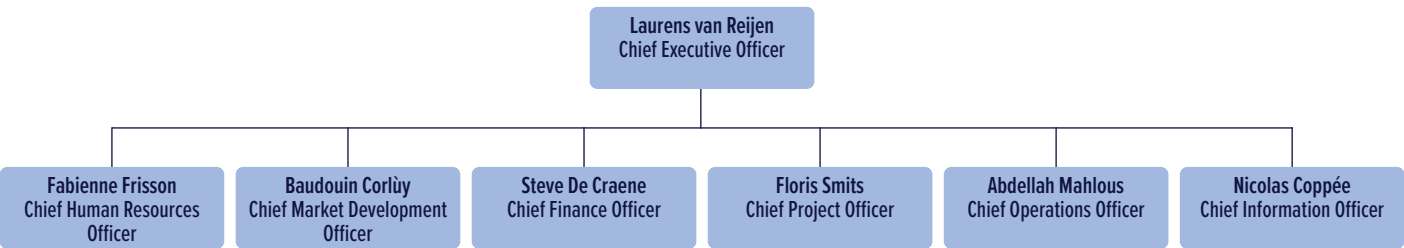
LCL's governance structure consists of a Management Team (MT) of seven members and a middle management team of five members. The Board of Directors (Board) comprises five non-executive members overseeing the company's strategic direction. The Board is composed of 80% independent members (four members). The gender ratio at each management level is as follows:

- **Board:** 60% female (three members) and 40% male (two members).
- **Management Team:** 14% female (one member) and 86% male (six members).
- **Middle management:** 60% female (three members) and 40% male (two members).
- **Overall representation in management and supervisory bodies:** 41% female (seven members) and 59% male (10 members).

Our sustainability governance is anchored with the Board and the MT, which act as the validating bodies responsible for the overall oversight of sustainability matters. Similarly, the Enterprise Risk Management (ERM) framework is monitored by the Quality Manager with full oversight responsibility by the MT and the Board.

We have assigned the implementation responsibility of sustainability-related IROs to LCL's Sustainability Workgroup whose composition is provided in Annex 2. This group is tasked with defining the strategic direction for sustainability initiatives, reviewing and approving sustainability goals, and ensuring that ESG considerations are fully integrated into LCL's decision-making processes.

The Sustainability Workgroup operates in close collaboration with our MT, with at least one meeting per month to monitor progress and align on key actions. LCL exercises oversight on company performance, including ESG metrics, through a structured KPI framework. This framework is integrated into the quarterly and yearly management reporting package, ensuring continuous monitoring and accountability for sustainability-related goals and overall business performance. The targets set in the KPI framework are approved by the MT after recommendations from the Sustainability Workgroup.



At LCL, sustainability-related controls and procedures are seamlessly integrated with internal functions to ensure a holistic and efficient approach to addressing material IROs. This integration is achieved through the following mechanisms:

- **Cross-Functional Collaboration:** The Sustainability Workgroup comprises representatives from key internal functions, including operations, finance, project management, sustainability, HR, and marketing. This multidisciplinary composition ensures that sustainability considerations are embedded in all aspects of organisational decision-making and operations. Regular bi-weekly meetings of the Sustainability Workgroup foster collaboration, enabling internal functions to align their efforts with the organisation's sustainability goals.
- **Aligned Reporting Structures:** Sustainability metrics and progress are reported quarterly to the MT. This ensures that dedicated controls and procedures are both informed by and inform other functional priorities, such as financial performance, operational efficiency, and employee well-being.
- **Integrated Risk Management:** Risk assessments are coordinated by internal functions, such as quality management and critical infrastructure, to ensure a unified approach to mitigating environmental and operational risks. Procedures, such as energy efficiency improvements and carbon reduction initiatives, are developed in consultation with operations and IT teams, ensuring alignment with broader organisational objectives.
- **Mandatory Training and Awareness:** Sustainability training modules, hosted on Data Center University, are mandatory for all employees, ensuring that sustainability controls and procedures are understood and implemented across all internal functions. Staff events and internal communications highlight sustainability topics, reinforcing their relevance to the organisation's overall strategy.
- **Centralised Governance:** The quarterly review of sustainability matters by the Board ensures that controls and procedures are integrated into the highest levels of organisational

governance. Feedback loops between the Sustainability Workgroup, the MT, and individual internal functions ensure continuous improvement and alignment.

Our sustainability-related expertise is closely aligned with our ability to address material impacts, mitigate risks and seize opportunities effectively. We achieve this alignment through the following mechanisms:

- **Identifying Material Impacts:** The Sustainability Workgroup provides a comprehensive understanding of ESG relevant considerations to LCL's operations.
- **Mitigating Risks:** Members of the Sustainability Workgroup possess specialist knowledge to identify and address risks, such as regulatory non-compliance, climate change-related disruptions, and reputational challenges.
- **Leveraging Opportunities:** The Sustainability Workgroup's knowledge of industry trends and innovations empowers us to proactively explore opportunities, such as renewable energy adoption and efficiency improvements in data center operations.

By embedding sustainability-related skills and expertise throughout our organisation, we ensure a proactive and informed approach to addressing material impacts, managing risks and capitalising on opportunities, all of which contribute to long-term value creation.

GOV-2: Information provided to and sustainability matters addressed by LCL's administrative, management and supervisory bodies

At LCL, our MT and Board are systematically informed about material IROs and the implementation and effectiveness of related policies and actions. This ensures informed decision-making and alignment with our strategic objectives.

Reporting frequency: Bi-weekly Sustainability Workgroup meetings inform the monthly reports to the MT. Findings from these reports are incorporated into the KPI framework, which is

included in the MT reporting pack on a quarterly basis. The Board will receive an overview of material impacts, risks and policy effectiveness during quarterly Board meetings.

Responsibility for Reporting: The Sustainability Workgroup, led by the Sustainability Manager, prepares and presents monthly updates, and collaborates with the finance department to integrate sustainability metrics into the KPI framework for quarterly reporting.

Scope of Information:

- **Material Impacts:** Evaluations of environmental, social, and governance (ESG) impacts based on established reporting frameworks.
- **Risks and Opportunities:** Analysis of risks (e.g., climate risks, regulatory changes) and opportunities to enhance operational efficiency or market leadership.
- **Policy Implementation:** Monitoring the progress and effectiveness of sustainability-related policies, due diligence processes, and actions.
- **Metrics and Targets:** Reporting on KPIs such as emission reductions, energy efficiency, and renewable energy usage, aligning with LCL's sustainability objectives.

Communication Channels: Updates are delivered through formal presentations during MT and Board meetings. Real-time updates on key sustainability metrics are made available through internal reporting tools and dashboards.

We use a strategy map, which is closely linked to a balanced scorecard, to align our objectives and monitor progress effectively. This framework provides a clear overview of our strategic goals, KPIs, and priorities. It is thoroughly reviewed every two years to ensure it remains relevant and up to date, with adjustments made where necessary to reflect changes in our business environment or strategic direction. All IROs coming from interviewees or LCL's risk inventory were addressed by the administrative, management and supervisory bodies. For a full list of the IROs, please refer to SBM3.

GOV-3: Integration of sustainability-related performance in incentive schemes

We have implemented incentive schemes and remuneration policies linked to sustainability goals, applicable to all LCL employees except for the Board. These are backed up by our Bonus Policy, which was validated by the MT and is reviewed periodically to ensure alignment with LCL's overall corporate goals and commitments.

Our bonus scheme for employees consists of three levels of objectives:

- **Company Goals:** These are the same for all employees and are determined by the MT. They include sustainability-related targets such as the safety KPI of ensuring no serious workplace accidents (10% weight within company goals).
- **Departmental Goals:** Set by department heads in collaboration with team members to align with departmental priorities.
- **Individual Goals:** Defined for each employee, with their importance weighted according to their role in the organisation.

The KPI framework serves as the basis for goal setting within the bonus structure, maximising alignment with sustainability targets. Sustainability-related metrics account for 78% of all KPIs. We conduct regular alignment sessions across departments to ensure consistency and clarity in performance expectations.

Our Bonus Policy also includes safety criteria (e.g., no serious workplace accidents), cyber security and presence at company events to indirectly support our broader ESG goals. Recognising the critical role of sustainability in long-term value creation, we are committed to expanding our remuneration framework to explicitly include sustainability-related performance metrics. This will align our incentive structures more closely with our corporate sustainability objectives.

GOV-4: Statement on due diligence over sustainability reporting

The sustainability statement outlines that the reporting of KPIs is approved by LCL's Chief Financial Officer (CFO). The reporting process allows for supporting evidence to be stored for each KPI, ensuring transparency and accountability in the due diligence process.

We adhere to multiple ISO Standards, certifications and are EcoVadis Platinum, which provide a solid internal due diligence of our sustainability efforts.

GOV-5: Risk management and internal controls over sustainability reporting

LCL's risk management covers strategic, operational, project-specific, and business continuity risks, aligned with ESG factors through a DMA. The risk management features:

- **Governance:** The Board oversees risk management, while the MT ensures execution and promotes a risk-aware culture.
- **Risk Identification and Assessment:** Every three years, we use a risk heat map to review and prioritise actions based on impact and likelihood. Emerging risks are also discussed during the quarterly reporting meeting.
- **Monitoring and Reporting:** Critical and high risks are reviewed each quarter by the Board and each month by the MT.

The Quality Manager coordinates the Enterprise Risk Management (ERM) process and reporting. A Risk Catalogue serves as an up-to-date repository of identified risks, while Action Plans integrate mitigation strategies within the broader ESG roadmap. Certifications, such as alignment with ISO standards and EcoVadis, also reinforce robust risk controls and sustainability commitments. This streamlined process ensures accurate and transparent sustainability reporting in line with our strategic goals.

Risk assessment at LCL involves identifying and evaluating risks based on predefined impact and likelihood scales. Risks are prioritised using a risk heat map, with critical and high risks requiring

immediate action plans. We update the process annually or upon significant changes, ensuring alignment with strategic objectives and ESG priorities.

The risks and mitigation strategies identified through this approach are presented in the following table.

TABLE 1: RISKS AND MITIGATION STRATEGIES

Strategic risk	Pricing and economies-of-scale: This risk is mitigated through quarterly margin analyses to assess cost efficiency and site profitability to ensure sustainable operations.
Operational risks	Data center outages: LCL implements enhanced Standard Operating Procedures (SOPs) and Emergency Operating Procedures (EOPs) to detect and prevent disruptions.
	Energy and resource management: The execution of the actions focused on energy efficiency and the implementation of climate adaptation strategies manage long-term resource risks.
Financial risk	Liquidity: We use regular monitoring through KPIs on working capital and quarterly financial reviews to assess liquidity risk and maintain cash flow stability.
People risk	Skill gaps and succession planning: We mitigate these risks through proactive recruitment strategies to attract necessary talent, developing skill matrices to track expertise across teams, and internal career development plans to support employee growth and leadership succession.
Technology risk	Cybersecurity: Continuous employee cybersecurity training programmes, strengthening supply chain security to mitigate third-party risks and IT/OT segregation are key elements of protection for our critical infrastructure.
Compliance risk	Permits and licences: Mitigation of risks related to permits and licences requires early integration of regulatory requirements into project designs, structured compliance checks to ensure adherence to regulations, and knowledge transfer processes to maintain regulatory expertise within the organisation.

The findings from LCL's risk assessment and internal controls are integrated into our internal functions and processes as follows:

1. Governance integration: The Board and MT review and validate high and critical risks, aligning them with strategic goals and ESG priorities. Findings influence the annual business updates and long-term planning.

- **Operational processes:** We incorporate key risks into operational frameworks, such as project risk management, data center operations, and energy management, ensuring alignment with ISO standards and other frameworks (e.g., ISO14001, CND-CP, ISO50001, ISO27001, ISO45001, ISO9001, ISAE3000 & ISAE34002 Type 2, PCI DSS, TIA942, TIER III, EcoVadis, etc.). Sustainability-related controls are tied to routine monitoring, such as ESG roadmap actions and energy efficiency projects.

2. Continuous monitoring and reporting: We track critical and high risks through monthly MT reviews and quarterly Board updates, integrating feedback into decision-making processes. We implement action plans and KPIs to monitor quarterly progress and ensure accountability.

3. Risk awareness and training: We communicate risk findings across departments to promote a culture of risk awareness. Training sessions and tools support consistent implementation of controls.

This approach ensures all risks, including sustainability related risks, are effectively embedded into our day-to-day operations and strategic initiatives.

At LCL, we structure periodic reporting of risk assessment findings and internal controls to administrative, management and supervisory bodies as follows:

- **Reporting Frequency:**
 - › Critical Risks: Reported quarterly to the Board and monthly to the MT.
 - › High Risks: Reviewed annually by the Board and bi-annually by the MT.
 - › Medium and Low Risks: Monitored and reported annually to the MT.
- **Content of Reports:**
 - › Summaries of risk assessments, including updates to the risk heat map and risk ratings.
 - › Progress on mitigation action plans, including KPIs.
 - › Identification of emerging risks or significant changes in the risk landscape.
- **Governance Oversight**
 - › The Board validates critical and high-risk strategies and ensures alignment with organisational objectives and ESG priorities.
 - › The MT oversees implementation, ensures compliance, and integrates findings into business continuity and operational plans.
- **Tools and Processes:** A centralised risk management system (e.g., dashboards) facilitates streamlined reporting and real-time updates for effective oversight.

This structured approach ensures accountability, informed decision-making, and alignment with sustainability goals across all levels of the organisation.

1.2 STRATEGY

SBM-1: Strategy, business model and value chain

Our business

We offer a range of services designed to support businesses in managing their IT infrastructure. To do so, we operate five independent Tier III certified data centers located in Antwerp (LCL Antwerp), Diegem (LCL Brussels-North), Huizingen (LCL Brussels-South), Aalst (LCL Brussels-West), and Gembloux (LCL Wallonia One), ensuring secure environments for housing and running business IT equipment, as well as availability and resilience for our clients.

Through our server colocation and housing services, companies can transfer their data centers to LCL, which allow them to focus on core operations while we take care of their IT infrastructure management. We also provide carrier-neutral interconnectivity, granting businesses access to 42 carriers and cloud services, enabling businesses to leverage scalable and flexible cloud infrastructure to support their operations efficiently. To achieve this, LCL employs 49 people, all working in Belgium. All services offered by LCL are fully compliant with applicable laws and regulations in the markets where we operate.

Our markets

We serve a diverse range of markets and customer groups with our data center services. In the corporate sector, we support businesses across various industries, including finance, health-care, media, telecommunications, and technology. Within the public sector, we collaborate with government entities and public institutions to meet their IT infrastructure needs. In the broader European market, LCL is a committed participant in the Climate Neutral Data Centre Pact, striving to achieve climate neutrality in EU data centers by 2030 while serving customers across the continent.

LCL’s customer base spans multiple segments. For small and medium enterprises (SMEs), we provide scalable solutions that allow for secure and efficient data center outsourcing, often partnering

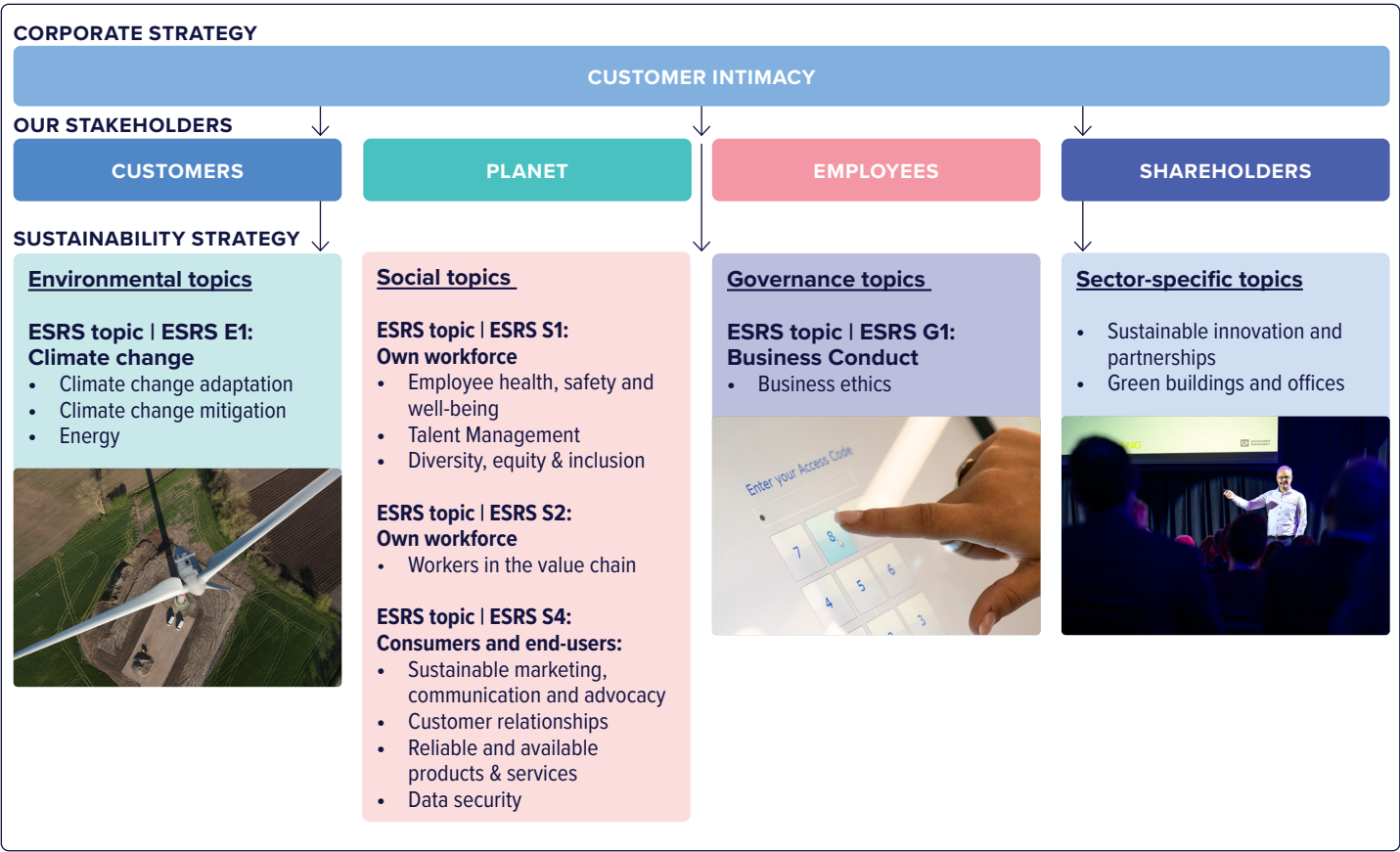
with system integrators to enhance service offerings. Large enterprises rely on LCL for robust and secure infrastructure to support their extensive operational needs. Startups and tech companies benefit from our flexible and scalable solutions, ensuring reliable data center services to drive business growth. Finally, educational institutions, including universities and research centers, receive dedicated support from LCL for their data storage and processing requirements.

100% of LCL’s revenue (EUR 29,557,125.14 in 2024) and all our activities are directly related to the technology group ESRS sector. No other ESRS sectors have a material value chain relationship with the company and therefore are not significant.

Considering that LCL services sit within one ESRS sector and are evenly provided to a variety of customer segments, the company does not consider heightened risk for specific geographies, markets or business relationships.

Our strategy

We have calibrated our sustainability-related goals following the ESG pillars, with strategic priorities derived from the results of our DMA. In addition, two company-specific topics have been included in our framework due to their enabling role in our commercial and impact priorities. The LCL strategy applies to all customer segments, data centers, employees and products and services.



This strategy allows us to align our customer intimacy strategy (corporate strategy) with sustainability pillars that respond to the needs of our customers for secure, efficient and sustainable data center solutions.

The description of specific sustainability-related goals and their relationship with material IROs can be found in the dedicated ESRS chapters of this sustainability statement.

LCL's relationships with stakeholders play a crucial role in aligning sustainability efforts with our corporate mission. We recognise that the needs of our stakeholders (active and silent stakeholders) have a key role in shaping our strategic direction.

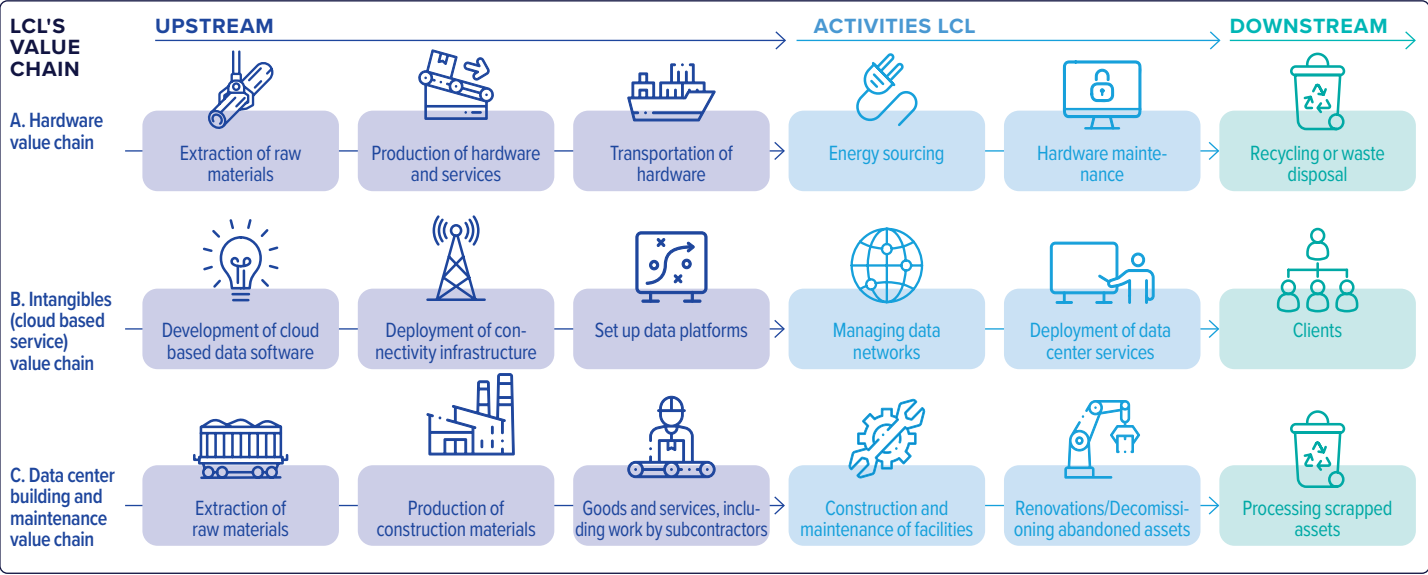
Our value chain

Our business model is based on operating as a one-stop data center, ensuring security, connectivity, uptime, and data availability for our customers. Beyond providing data center services, we emphasise humanising data center management, upskilling employees, and fostering a culture of continuous learning and improvement.

As such our value chain consists of three streams: hardware value chain, intangibles value chain and data center building and maintenance value chain.

Our inputs comprise human capital, with a focus on diversity and continuous training, alongside financial and natural resources, such as natural gas consumption and green electricity. Our outputs are reliable, available, and well-connected data centers.

With such a business model, customers benefit from access to the best-connected digital hub, while investors see strong financial performance. Employees thrive in a workplace culture that fosters innovation, collaboration, and environmental responsibility. LCL's core values are trust, respect, open-mindedness, team spirit, and commitment. At a broader level, LCL contributes to society by optimising resource use and generating environmental value.



We recognise that our inputs are key to the success of LCL. Human capital, natural resources and financial capital are all carefully considered to ensure that the actions of LCL secure inflows while generating positive impact. We acknowledge that the great need for energy for the operations of data centers imposes a challenge to reduce our carbon footprint and its associated impacts on people and the environment. We are therefore making major investments in innovation to reduce this potential risk (see ESRS E1).

SBM-2: Interests and views of stakeholders

LCL's stakeholder engagement strategy is built on value chain mapping and stakeholder segmentation. In addition to ongoing engagement with internal stakeholders, in 2022 and 2024 two stakeholder consultation exercises were conducted with the aim of better understanding the interests, perspectives and needs of interested and affected stakeholders of the company.

Direct stakeholder consultation was conducted via dedicated engagement, such as interviews, workshops, and data collection templates. We engaged internal stakeholders such as the Chief Human Resources Officer, the Chief Operations Officer, the

Quality Manager, the Chief Information Officer, the IT Systems Manager, the Procurement specialist, the Chief Finance Officer, and Board members, as well as external stakeholders including partners, customers, shareholders, financial institutions, NGOs, industry associations, business partners, regulators, and policy makers. We engage with both internal and external stakeholders, ensuring a broad representation of perspectives, including employees, suppliers, partners, customers, and institutions across various sectors.

Indirect stakeholder consultation was also conducted by analysing internal and external documents such as policies, industry reports, and comparative studies. Through direct and indirect consultation methods we captured stakeholder views on LCL's sustainability impacts, risks and opportunities as part of the double materiality assessment. This process also serves to inform LCL's ESG strategy and reporting.

The outcome of stakeholder engagement was carefully consolidated for the development of an ESG roadmap and corporate sustainability strategy, guided by the materiality of sustainability matters. Through this process, we gained a deeper understanding of the interests and concerns of LCL's key stakeholders.

To ensure transparency and accountability, LCL's MT and Board were kept informed of stakeholder views and interests regarding sustainability-related impacts. The results of the consultation process were extensively reviewed by LCL, ensuring that stakeholder insights were effectively integrated into decision-making processes.

1.3 IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

IRO-1: Description of the process to identify and assess material impacts, risks and opportunities

In 2023, we conducted LCL's first DMA. The goal was to identify the most relevant ESG topics for LCL on the basis of impact and financial materiality. The four-step approach outlined below was applied consistently across all activities, business relationships, and geographies, using the same assessment criteria for both negative and positive impacts.

1. Define the scope and objective

Firstly, we mapped the legal entities, regions of direct operations, customer markets, main purchased products and services, service portfolio, main customers, and overall flows of raw materials. We consolidated this information into LCL's value chain and value chain streams and mapped interested and affected stakeholders. Stakeholders that were already engaged for the single materiality assessment in 2023 were mapped in a stakeholder segmentation template. This process ensured that previous inputs were also considered as part of indirect stakeholder consultation methods for the 2023 DMA. We also identified internal stakeholders via interviews.

TABLE 2: STAKEHOLDER ENGAGEMENT – PURPOSE, CHANNELS AND OUTCOMES

Stakeholder group	Purpose of engagement	Channels	Example of outcomes
Employees	Understand needs and perceptions Provide a platform for suggestions for improvement Contribute to sustainability agenda	Employee satisfaction surveys Intake interviews Dedicated trainings Working groups	Input for ESG strategy Update in policies and targets Adaptation of planned and ongoing activities and initiatives at LCL
Customers	Understand needs and expectations Customise services and build trust Align services with evolving customer requirements	Interviews Customer inquiries Account manager touch points	Enhanced alignment of LCL's services with customer needs
Board of Directors and CEO	Define performance, risk considerations and long-term value creation	Interviews	Validation of ESG framework and KPI framework New perspectives on ESG
Suppliers	Ensure compliance with Code of Conduct Create closer relationship with upstream value chain Understand needs and challenges	Interviews Supplier questionnaires	Inputs for supplier selection assessment
Regulators	Ensure compliance with regulations and alignment with evolving obligations	Desk research	Adjustment to ensure ESG compliance
Industry associations	Unify the efforts of the data center sector with regard to ESG	Active engagement in association	Participate in the ESG goals of data centers in Europe
Partners and peers	Align LCL's actions and direction with those of other stakeholders of the industry	Interviews Desk research	Assure alignment in material topics and focused areas for positive impact
NGOs and local communities	Ensure community benefit and enhance licence to operate	Desk research Interview with internal employees as proxies	Include community benefits in planned projects
Environment	Understand the major impacts of the company	Desk research ENCORE	Engage a comprehensive view of environmental impacts in the DMA

2. Identify topics and IROs

Starting from the ESRS topics, subtopics, and sub-subtopics, we established a tailored list of sustainability matters to be assessed.

For all the subtopic with the exception of the topics defined as “not applicable”, we developed a list of IROs for LCL's own operations and value chain. This list included potential and actual impacts on affected stakeholders (including silent stakeholders) and scenarios that could jeopardise business operations and relationships. We discussed the interrelation between topics, and the connections of impacts and dependencies with risks and opportunities (ROs), with different stakeholders. We then classified the long list of IROs using descriptive measures, as follows:

- Time horizon: whether we expect the IRO to materialise in the short term, medium term, or long term.
- Value chain position: whether the IRO occurs in LCL's own operations, upstream in the value chain, downstream in the value chain, or in any combination of multiple options. Impacts through LCL's activities in our own operations or as a result of business relationships were engaged throughout the stakeholder engagement process.

TABLE 3: LIST OF MAPPING OF ESRS SUB (SUB) TOPICS AND LCL'S TAILORED TOPICS

ESRS SUB (SUB) TOPICS	LCL TOPICS
ESRS E1: Climate Change	
Climate change adaptation	1. Climate change adaptation
Climate change mitigation	2. Climate change mitigation
Energy	3. Energy
ESRS E2: Pollution	
Pollution of air	4. Pollution
Pollution of water	
Pollution of soil	
Pollution of living organisms and food resources	
Microplastics	
Substances of concern	
Substances of very high concern	
ESRS E3: Water and marine resources	
Water consumption	5. Water
Water withdrawals	
Water discharges	
Water discharges in the oceans	Not applicable
Extraction and use of marine resources	Not applicable
ESRS E4: Biodiversity and ecosystems	
Direct impact drivers of biodiversity loss	6. Biodiversity and ecosystems
Impacts on the state of species	
Impacts on the extent and condition of ecosystems	
Impacts and dependencies on ecosystem services	
ESRS E5: Circular economy	
Resources inflows, including resource use	7. Circular economy
Resource outflows related to products and services	
Waste	

ESRS SUB (SUB) TOPICS		LCL TOPICS
ESRS S1: Own workforce		
Work-life balance	8. Employee health, safety and well-being	
Health and safety		
Working time	9. Talent management	
Adequate wages		
Secure employment		
Training and skills development		
Gender equality and equal pay for work of equal value	10. Diversity, equity and inclusion	
Diversity		
Employment and inclusion of persons with disabilities		
Measures against violence and harassment in the workplace	11. Workers' social rights	
Freedom of association, the existence of works councils and the information, consultation and participation rights of workers		
Social dialogue		
Collective bargaining, including rate of workers covered by collective agreements		
Child labour		
Forced labour		
Adequate housing		
Privacy		
ESRS S2: Workers in the value chain		
Working conditions	12. Workers in value chain	
Equal treatment and opportunities for all		
Other work-related rights		
ESRS S3: Affected communities		
Communities' economic, social and cultural rights	13. Local communities	
Communities' civil and political rights		
Rights of indigenous peoples		

ESRS SUB (SUB) TOPICS	LCL TOPICS
ESRS S4: Consumers and end-users	
Information-related impacts for consumers and/or end-users	14. Sustainable marketing, communication and advocacy
	15. Reliable and available products & services
Personal safety of consumers and/or end-users	16. Customer relationships
	17. Data security
Social inclusion of consumers and/or end-users	18. Inclusive services
ESRS G1: Business conduct	
Corporate culture	19. Business ethics
Protection of whistle-blowers	
Management of relationships with suppliers including payment practices	
Corruption and bribery	
Political engagement	
Animal welfare	Not applicable
Sector or entity-specific topics	
	20. Sustainable innovation and partnerships
	21. Green buildings and offices

3. Assess impact and financial materiality

We collected information to assess the identified IROs through direct (interviews) and indirect (desk research) consultation with stakeholders, based on impact materiality (inside-out perspective) and financial materiality (outside-in perspective). We consolidated the information from different sources following the criteria of impact and financial materiality on a scale of 1 to 5, where 5 is the highest rank. Through the qualitative collection of information for each IRO, we consulted our stakeholders and identified the area of the business (geography, stakeholders involved, etc.) to which the IRO was relevant and potentially material.

- Impact materiality criteria
 - › Scale: magnitude of the impact on the environment and society.
 - › Scope: how widespread the impact is in terms of people and/or natural resources affected.
 - › Remediability: the extent to which the impact can be remediated (negative impacts only)
 - › Likelihood: probability of the impact taking place
- Financial materiality criteria
 - › Financial impact: the magnitude of the financial impact on the company.
 - › Likelihood: the probability of the impact taking place.

IRO assessment did not consider heightened considerations.

TABLE 4: IMPACT MATERIALITY CRITERIA

Scale	Scope	Remediability	Likelihood	Likelihood factor
1 - minimal	1 - limited	1 - relatively easy to remedy short-term	1 – Very low (<20%)	0,6 = very low
2 - low	2 - concentrated	2 - remediable with effort (time & cost)	2 - Low (20-50%)	0,65 = low
3 - medium	3 - medium	3 - difficult to remedy or mid-term	3 - Likely (50-80%)	0,75 = medium
4 - high	4 - widespread	4 - very difficult to remedy or long-term	4 - High (>80%)	0,9 = high
5 - absolute	5 - global / total	5 - non-remediable / irreversible	5 - Absolute (100%)	1 = very high

4. Validation of materiality

The material IROs went through multiple validation processes:

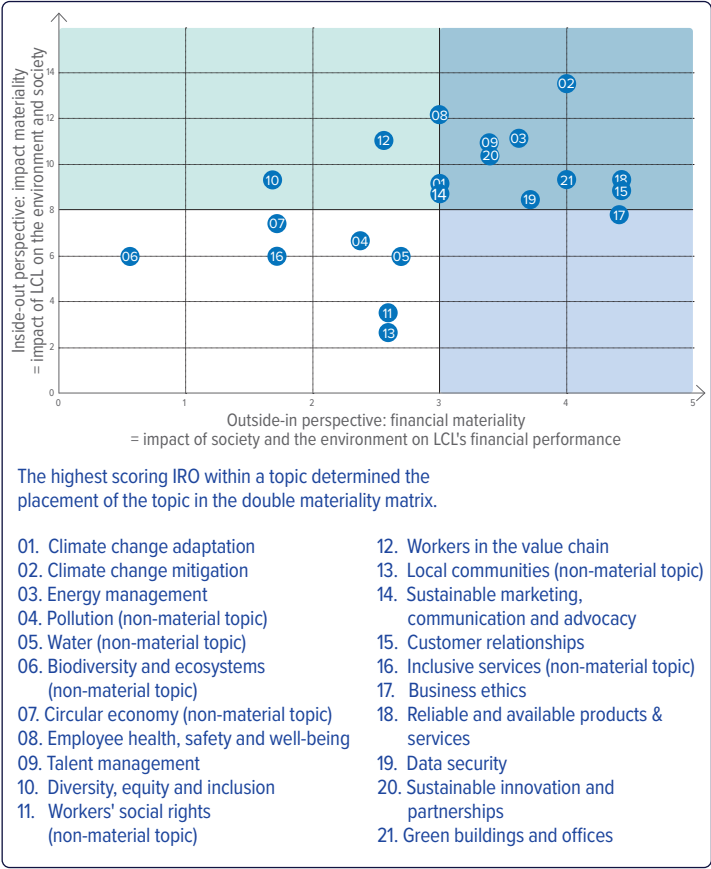
- a. Internal feedback sessions with the project team.
- b. Review of the IROs by internal expert.
- c. Validation of results by the MT.

Main assumptions of the assessment include i) that internal experts provided an objective assessment of sustainability matters; and ii) that all stakeholders' perspectives are considered equally relevant.

The DMA process and results are aligned with LCL's ERM framework. As such, the risks identified during the DMA were incorporated in the ERM risk inventory during 2024. The DMA results were used alongside ISO risk analyses, threat assessments, and audit results to inform and strengthen the ERM framework and its associated register and policy. This integration ensures that sustainability-related risks are aligned with broader risk management processes, enabling a comprehensive evaluation and driving informed decision-making. Material opportunities were validated by the LCL MT and will be engaged in decision-making moving forward (refer to GOV-1 and GOV-5). Given that this is LCL's first DMA, a comparison with prior years is not practical.

TABLE 5: FINANCIAL MATERIALITY CRITERIA

Magnitude of financial impact	Likelihood	Likelihood factor
1 - Minimal - Less than 100k financial impact	1 – Very low (<20%)	0,6 = Very low
2 – Low - Between 100k and 500k financial impact	2 - Low (20-50%)	0,65 = Low
3 – Medium - Between 500k and 1M financial impact	3 - Likely (50-80%)	0,75 = Likely
4 – High - Between 1M and 3M financial impact	4 - High (>80%)	0,9 = High
5 – Absolute - More than 3M financial impact	5 - Absolute (100%)	1 = Absolute



SBM-3: Material IROs and their interaction with strategy and business model

The DMA resulted in a set of material IROs carefully assessed against our business strategy and model. Through this process we were able to identify, localise and assess impact of sustainability matters and anticipated/current financial effects in our business model.

TABLE 6: LIST OF MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

PART 1/3

Topic		IRO	Value chain	Time horizon	Effect on people or environment	Connection with the strategy and the business model	Anticipated financial impact
Climate change adaptation	Actual positive impact	Innovative climate-resilient infrastructure and practices to assure safety and continuity of activities.	Own operations	Short term	Impact on employees and customers from natural hazards	Disruption of operations Reduced trust of customers	+++
	Risk	Heat stress impact on the essential cooling-related aspects for the well-functioning of the data centers of LCL's operations.	Own operations	Long Term			
	Risk	Localised fires leading to property damage and disruption of operations; especially if the fossil/biofuels stored for the emergency generators catch fire.	Own operations	Short term			
Climate change mitigation	Actual negative impact	LCL's CO2-intensive value chain (including extensive network deployment, network infrastructure) including testing the uninterruptible power supply (UPS) and the emergency generators, the refrigerant leakages and the company cars.	Upstream, own operations, downstream	Short term	Impact has a long-term detrimental effect on the environment	Higher dependency in energy-related inflows	+
	Actual positive impact	LCL's transition to procuring electricity from renewable sources and self-generation.	Upstream, own operations, downstream	Short term	Impact positively the growth of the green energy sector and its associated impacts on sustainable growth	Reduced dependency on energy inflows Competitive advantage Differentiating factor accessing finance	++
	Potential positive impact	LCL's commitment to making all its data centers climate-neutral by 2030 on its own initiative.	Upstream, own operations, downstream	Short term			
	Opportunity	Progress on climate change mitigation and decarbonisation, creating strategic advantages boosting LCL's reputation, revenue streams, regulatory compliance, and better financing conditions.	Own operations	Middle term			
Energy Management	Potential positive impact	Adopting energy efficiency measures such as Power Usage Effectiveness (PUE) on data centers.	Own operations	Middle term			
	Opportunity	Production and storage (batteries, hydrogen, nuclear) of own renewable energy (solar panel park, windmills).	Own operations	Middle term			
	Risk	Exposure to energy-related financial impacts impacting LCL's operational costs. This could be caused by price volatility, regulatory changes of long-term PPAs, etc.	Upstream, Own operations	Middle term			
	Opportunity	Growing client ESG maturity, resulting in clients being willing to pay a premium price in light of LCL's energy management and other sustainability best practices.	Own operations	Middle term			
	Opportunity	Cost-saving linked to improving energy efficiency and reducing energy consumption (electricity, heating) by redesigning and implementing energy-efficient technologies (cloud and fibre, shifting from diesel to biofuel).	Own operations	Middle term			

Financial impact legend

+++ Very high anticipated/current financial impact on LCL's operations

++ High anticipated/current financial impact on LCL's operations

+ Potentially relevant anticipated/current financial impact on LCL's operations

TABLE 6: LIST OF MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

PART 2 / 3

Topic		IRO	Value chain	Time horizon	Effect on people or environment	Connection with the strategy and the business model	Anticipated financial impact
Own workforce	Actual positive impact	Providing training and various initiatives resulting in minimised risks and high workplace safety. LCL is very active in safety as it is its core business.	Own operations	Short term	Physical and mental wellbeing of employees and customers	Employee wellbeing, safety and skillset enable LCL's operations across topics	++
	Actual positive impact	Improved mental and physical well-being of employees as an outcome of LCL's focus to create a culture of healthy employees.	Own operations	Short term			+
	Actual positive impact	Employee consultation giving insights on employees' feelings and LCL's point of improvements.	Own operations	Short term			
	Actual positive impact	Development of the skills of employees through conversation and development of a personal plan linked to ESG trainings.	Own operations	Middle term			++
	Potential positive impact	Inclusion of females in the workforce and the board.	Own operations	Middle term	New and improved services that impact our clients with benefits for customers, employees, and the environment	New and innovative perspectives Talent scarcity	+
	Risk	Lack of communication between departments affecting talent management by limiting collaboration and knowledge sharing and work efficiencies, potentially impacting employee development.	Own operations	Middle term			++
	Risk	Losing key roles (especially middle management) due to a concentration of workload and increased employee turnover.	Own operations	Middle term			
	Risk	Lack of availability of specific profiles needed for business continuity and innovation.	Own operations	Short term			
	Opportunity	Empowering innovation through diversity in human capital (background, age, experience etc.), proper training and well-established culture and processes.	Own operations	Short term		ESG as a value proposition for customers	
	Opportunity	Attracting new talent due to the efforts of LCL in the ESG agenda.	Own operations	Middle term			+++
Workers on the value chain	Potential negative impact	Exposure of workers in upstream value chain to dangerous, harsh working conditions.	Upstream	Short term	Impact on workers in the value chain	Supply chain resilience and potential impact on reputation	+
Business ethics	Opportunity	Strong ethical behaviour and sustainability performance resulting in obtaining customer trust and other indirect benefits like favourable financing conditions etc.	Own operations	Middle term	Ethical environment benefits both society and the environment	Strong relationships and trust	

Financial impact legend

+++ Very high anticipated/current financial impact on LCL's operations

++ High anticipated/current financial impact on LCL's operations

+ Potentially relevant anticipated/current financial impact on LCL's operations

TABLE 6: LIST OF MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

PART 3 / 3

Topic		IRO	Value chain	Time horizon	Effect on people or environment	Connection with the strategy and the business model	Anticipated financial impact
Customers and end users	Actual positive impact	Active communication with clients, creating awareness and ESG related initiatives.	Own operations	Short term	Transparent communication on efforts, services and challenges	Strong relationships and trust	+
	Actual positive impact	Customer relationships in terms of trust and safety.	Own operations, downstream	Short term			+++
	Risk	Services not meeting quality standards can lead to loss of business, profit, litigation, liabilities and reputational damage as clients are very driven by operation continuity.	Own operations	Middle term			
	Opportunity	LCL strong ESG/sustainability branding.	Own operations	Short term			
	Opportunity	Advocating sustainable practices, promoting eco-friendly solutions, creating industry leadership, reducing LCL's environmental impact.	Own operations, downstream	Short term			+
	Opportunity	LCL's ambition to ensure high customer satisfaction addressing their needs and desires.	Own operations	Middle term			+++
	Risk	Focusing too much on acquiring new client and neglecting the support/ further development older and trusted clients.	Own operations	Middle term			++
	Opportunity	LCL's operational agility, reliability and proximity which is a building block of trust.	Own operations	Short term		Reliable, available services	+++
Data Security	Risk	Failure to provide data stored by critical entities potentially leading to severe loss of trust, reputational damage and legal implications for LCL.	Own operations	Short term	Impact of customer and end user rights on privacy	Disruption of operations, loss of trust from clients	
	Potential negative impact	Cyber-attack caused by security gaps of LCL's services, employees, or employees of clients.	Own operations	Middle term			
	Risk	Threats that could compromise the physical security and safety of the facility, infrastructure, personnel, and assets e.g. floods, intruders etc.	Own operations	Short term			
	Risk	Threats that could compromise the cyber security as data centers are a possible target for hackers or other illegal causes.	Own operations	Middle term			
Sustainable innovation and partnerships	Opportunity	Active communication with clients, creating awareness and ESG related initiatives.	Own operations	Long Term	Transparent communication on efforts, services and challenges	Strong relationships and trust	+
	Potential positive impact	Development of new smart solutions accelerating the development of sustainable offerings for clients and ensuring process efficiency.	Own operations	Short term	Collaboration for innovative solutions	Innovation	++
	Potential positive impact	Ability of innovative solutions to provide direct and indirect benefits for society and the environment.	Own operations	Short term			+
Green building and offices	Risk	Evolving regulations demanding LCL to adapt the ongoing construction of data centers towards environmental friendly processes and energy saving systems.	Own operations	Middle term	Impact positively the growth of the green energy sector and its associated impacts on sustainable growth	Increase operating costs Increase customer trust	+++
	Potential positive impact	The construction of green buildings and offices can significantly contribute to environmental sustainability by promoting resource efficiency, reducing waste, and mitigating environmental impact.	Upstream, own operations	Middle term			++

Financial impact legend

+++ Very high anticipated/current financial impact on LCL's operations

++ High anticipated/current financial impact on LCL's operations

+ Potentially relevant anticipated/current financial impact on LCL's operations

Integration of DMA outcomes into business strategy and operations

We embed sustainability in every department of our organisation. The DMA serves as the foundation for the prioritisation of risks and opportunities. As such, since its validation, opportunities are either aligned with existing initiatives or further evaluated by the MT. Risks, on the other hand, are fully integrated into the ERM model and closely monitored by the MT and the Board. We update LCL's ERM model annually, providing a structured approach to risk reduction, mitigation, and resilience enhancement.

IRO-2: Disclosure requirements in ESRS covered by this sustainability statement

TABLE 7: LIST OF DATA POINTS IN CROSS-CUTTING AND TOPICAL STANDARDS DERIVED FROM OTHER EU LEGISLATION

PART 1/3

Datapoint	SFDR	Pillar 3	Benchmark regulation	EU Climate Law	Page
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	×		×		p.3
ESRS 2 GOV-1 Percentage of Board members who are independent paragraph 21 (e)			×		p.3
ESRS 2 GOV-4 Statement on due diligence paragraph 30	×				p.5
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	×	×	×		p.7
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	×		×		p.7
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	×		×		p.7
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) i			×		p.7
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				×	p.21
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		×	×		p.22
ESRS E1-4 GHG emission reduction targets paragraph 34	×	×	×		p.29
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	×				p.31
ESRS E1-5 Energy consumption and mix paragraph 37	×				p.31
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	×				p.31
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	×	×	×		p.31
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	×	×	×		p.31
ESRS E1-7 GHG removals and carbon credits paragraph 56				×	p.31
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			×		Material (phase-in)
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)		×			Material (phase-in)
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		×			Material (phase-in)
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)		×			Material (phase-in)
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69			×		Material (phase-in)
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water, and soil, paragraph 28	×				Non-material
ESRS E3-1 Water and marine resources paragraph 9	×				Non-material
ESRS E3-1 Dedicated policy paragraph 13	×				Non-material
ESRS E3-1 Sustainable oceans and seas paragraph 14	×				Non-material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	×				Non-material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	×				Non-material
SRS 2- SBM 3 - E4 paragraph 16 (a) i	×				Non-material

TABLE 7: LIST OF DATA POINTS IN CROSS-CUTTING AND TOPICAL STANDARDS DERIVED FROM OTHER EU LEGISLATION

PART 2/3

Datapoint	SFDR	Pillar 3	Benchmark regulation	EU Climate Law	Page
SRS 2- SBM 3 - E4 paragraph 16 (b)	×				Non-material
SRS 2- SBM 3 - E4 paragraph 16 (c)	×				Non-material
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	×				Non-material
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	×				Non-material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	×				Non-material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	×				Non-material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	×				Non-material
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	×				p.33
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	×				p.33
ESRS S1-1 Human rights policy commitments paragraph 20	×				p.33
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			×		p.33
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	×				p.33
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	×				p.33
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)	×				p.34
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	×		×		p.37
ESRS S1-14 Number of days lost to injuries, accidents, fatalities, or illness paragraph 88 (e)	×				p.37
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	×		×		Non-material
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	×				Non-material
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	×				Non-material
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	×		×		Non-material
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	×				p.37
ESRS S2-1 Human rights policy commitments paragraph 17	×				p.38
ESRS S2-1 Policies related to value chain workers paragraph 18	×				p.38
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	×		×		p.38
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			×		p.38
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	×				p.39

Non-material ESRSs

We have determined material IROs by assessing the relevance of various ESRS standards to LCL's data center operations.

Given the nature of our operations as a data center, we found that pollution, water, and biodiversity (ESRS E2-3-4) are environmental topics that are not materially impacted by our operations.

Circular economy and waste (ESRS E5) is an area that will require further exploration in the future. While hardware equipment is a relevant topic within the industry, our business primarily focuses on leasing space for clients to install their own servers. We assessed our impact and influence on this downstream value chain activity accordingly and deemed the circular economy as non-material for this reporting year. However, we actively engage in circular economy initiatives, as detailed in the LCL Activity Report 2024.

For Affected and local communities (ESRS S3), the direct interaction of our operations with local or affected communities is low, and therefore, we classified this topic as non-material.

Additionally, we identified two company-specific material topics: "sustainable innovation and partnerships" and "green buildings and offices." Due to the absence of sector-specific guidelines, we have chosen not to report on these two topics in this sustainability statement.

TABLE 7: LIST OF DATA POINTS IN CROSS-CUTTING AND TOPICAL STANDARDS DERIVED FROM OTHER EU LEGISLATION PART 3/3

Datapoint	SFDR	Pillar 3	Benchmark regulation	EU Climate Law	Page
ESRS S3-1 Human rights policy commitments paragraph 16	×				Non-material
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	×		×		Non-material
ESRS S3-4 Human rights issues and incidents paragraph 36	×				Non- material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	×				p.42
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	×		×		p.42
ESRS S4-4 Human rights issues and incidents paragraph 35	×				p.44
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	×				p.45
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	×				Non-material
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	×		×		Non-material
ESRS G1-4 Standards of anti-corruption and anti- bribery paragraph 24 (b)	×				Non-material

2 EU Taxonomy

The EU Taxonomy Regulations, approved in 2020, is a classification framework established to determine whether an economic activity is environmentally sustainable, enhancing transparency and facilitating sustainable investment decisions.

Companies subject to CSRD regulation, are required to disclose under EU Taxonomy and to consider all the economic activities of each of the six environmental objectives (i.e., climate change mitigation, and adaptation, water, pollution, circular economy and biodiversity).

LCL has decided to voluntarily disclose on it as we are committed to sustainability and in doing our part in reaching the EU Green Deal.

2.1 ELIGIBILITY

The eligibility assessment consists of identifying all economic activities of LCL that fall within the scope of the EU Taxonomy. A user-friendly version of the list of eligible activities is publicly available in the [EU Taxonomy Compass](#).

We have thoroughly assessed the definition (and in some cases also related Technical Screening Criteria (TSC)) of each activity included as part of the long list defined by the EU Taxonomy Regulation and based on the activity description, identified the economic activities eligible for LCL for the financial year 2024. The list of eligible activities and the link with LCL is available in Annex 1.

A shorter list of eligible activities has been assessed based on whether LCL earned revenue, incurred capital expenditure and operating expenditure during the 2024 reporting period.

2.2 ALIGNMENT

The alignment assessment consists in meeting the substantial contribution and the do no significant harm (DNSH) criteria (at the level of and for each eligible activity) as well as complying with the minimum safeguards (at Group level).

TABLE 8: SHORT LIST OF EU TAXONOMY ELIGIBLE ACTIVITIES FOR LCL

Activity Number	Activity	Description	Link with LCL	Relevant KPI
CCM/CCA 6.5	Transport by motorbikes, passenger cars and light commercial vehicles	Purchase, financing, renting, leasing and operation of vehicles designated as category M1, N1 or L (2- and 3-wheel vehicles and quadricycles).	EV cars and operational lease	OpEx
CCM/CCA 7.1	Construction of new buildings	The development of construction projects for residential and non-residential buildings by combining financial, technical, and physical means with a view to sell the building upon delivery or at a later date, as well as the construction of complete residential or non-residential buildings, on own account for sale or on a fee or contract basis.	Expansion projects: BW4 and Christo	CapEx
CCM/CCA 7.3	Installation, maintenance and repair of energy efficiency equipment	Individual renovation measures consisting in installation, maintenance or repair of energy efficiency equipment.	Cooling Systems – Only related to energy-efficient HVAC systems.	CapEx
CCM/CCA 7.4	Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings.	Charging stations for EV	CapEx
CCM/CCA 7.6	Installation, maintenance, and repair of renewable energy technologies	Installation, maintenance and repair of renewable energy technologies, on-site.	Solar panels and wind turbines	CapEx
CCM/CCA 8.1	Data processing, hosting, and related activities	Storage, manipulation, management, movement, control, display, switching, interchange, transmission or processing of data through data centers, including edge computing.	Five data centers across Belgium	Turnover and OpEx

For each eligible activity we assessed the required criteria and where feasible collected the relevant documentation used as evidence to prove alignment.

Substantial Contribution

As shown in the relevant disclosure templates, two activities are aligned as per the below:

- 7.6 Installation, maintenance, and repair of renewable energy technologies: The expansion of the Gembloux solar PV park (constructed) and the installation of three windmills (ongoing construction).
- 8.1 Data processing and hosting: The expected practices listed in the European Code of Conduct on Data Centre Energy Efficiency have been audited by an independent third party and received the ‘pass’ criteria. The alignment portion of Activity 8.1 relates to the data processing, hosting and related

activities of site BW3. Revenue is earned from the specific site and operating expenses have been incurred during the 2024 reporting period.

For all the other eligible activities in the short list (i.e., 6.5, 7.1, 7.3 and 7.4), LCL does not have the necessary evidence to prove compliance and will work further on obtaining such documentation to get alignment achieved.

Do No Significant Harm

- **Climate change adaptation:** A physical climate risk & vulnerability assessment (CRVA) was conducted covering all material sites and assets of LCL and it provided insights in exposure to climate hazards for different climate scenarios (low and high emissions as per the climate scenarios of the Network for Greening the Financial System). This assessment concluded that material risks related to pluvial flooding exist for data center Brussels South and windmill WT01 in Rumst, in all different climate scenarios and time horizons assessed. Adaptation solutions are being implemented which are considered to mitigate this risk adequately.
- **Water use and marine resources:** LCL data centers function with a 'closed water system' hence not significantly harming water quality and water stress.
- **Circular economy:** For our data centers, the equipment is the property of our client hence the first two substantial contribution would not be applicable. In addition, relating to the waste management plan we have the ISO 14000.
- **Pollution prevention:** This criteria is not applicable for activity 7.6 and 8.1. On the other hand, for activity 7.1 LCL does not have the necessary evidence to prove compliance and will work further on how to obtain such documentation in the next years.
- **Biodiversity:** This criteria is not applicable for activity 7.6 and 8.1. On the other hand, for activity 7.1, LCL does not have the necessary evidence to prove compliance and will work further on how to obtain such documentation in the next years.

Minimum Safeguards

Minimum Safeguards apply at group level and require to have policies and due diligence processes implemented for four themes: human rights, anti-bribery and corruption, taxation and fair competition.

Human Rights: Our existing human rights policy adheres to the Organisation for Economic Co-operation and Development (OECD), the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization (ILO). As part of our risk protocol, we conduct due diligence procedures that encompass all our current suppliers.

Anti-corruption and bribery: Our present anti-bribery and corruption policy is in accordance with the Anti-Bribery and Corruption standard. LCL fully complies with the Convention on Combating Bribery. We provide internal training on Anti-bribery & Corruption annually at LCL. Additionally, LCL has implemented a Whistleblowing Policy to enable individuals to report any suspicious activities anonymously.

Fair competition: Our current fair competition policy is consistent with the Code of Conduct. LCL has implemented a Whistleblowing Policy to report any instances of fraudulent activities related to taxation or social fraud.

Taxation: We uphold a responsible tax policy that aligns with our broader sustainability objectives and principles of sustainable business conduct. We ensure transparent, accurate, and timely compliance with tax and customs regulations across all jurisdictions in which we operate.

We take a proactive approach to tax compliance, ensuring that our policies and practices support transparency and ethical conduct and we fulfil the associated declaration and reporting obligations carefully and punctually. We refrain from using aggressive tax structuring models whose sole purpose is to obtain advantages not permitted by law.

As tax compliance is a responsibility of all of us, we maintain open and constructive engagement with relevant internal and external stakeholders, including tax authorities and auditors, to foster trust and accountability.

Through this approach, we reinforce our role as a reliable and ethical partner, contributing to long-term sustainable economic development.

Lastly, LCL has not been convicted for material breaches of any of the various themes of the minimum safeguards.

To conclude, based on the guidance provided on this topic by the European Commission and the Platform on Sustainable Finance, we align with minimum safeguards at Group level.

2.3 IMPLEMENTATION OF EU TAXONOMY REGULATION

The scope considered for the key performance indicators is the Group consolidated scope as defined in the Annual Accounts. It relates to the reporting period December 2024; this is the first reporting period of EU Taxonomy therefore no prior year figure is available.

In compliance with Annex I of the EU Taxonomy disclosure delegated act, LCL integrates the EU Taxonomy required disclosures as part of the sustainability report. In order to prevent double accounting of revenue recognized and CapEx and OpEx incurred for the relevant activities have only been taken into account once.

For eligible activities that contribute to more than one environment objective, LCL assessed the most relevant environment objective by assessing the main objective of each activity. LCL indicated the most relevant environmental objective as part of the disclosure templates.

The following Key Performance Indicators (KPIs) are disclosed for eligibility as well as alignment:

Revenue

Denominator:

The total revenue is based on LCL's consolidated revenue in accordance with Belgian GAAP, considering all the 70 accounts (Refer to Code 70, Note 6.10 of the Annual Accounts). The total revenue amounted to €29.5 million for reporting period of 2024.

Nominator:

The total revenue recognised by LCL relates to Activity 8.1: Data processing, hosting and related activities as defined by EU Taxonomy. The total revenue amounting to €29.5 million is assessed as eligible.

As at 31 December 2024, the proportion of eligible and aligned revenue was 87.17 % and 12.83 % respectively as illustrated in the respective disclosure template.

Operating expenditure

Denominator:

Total Operating expenditure as defined by EU Taxonomy refers to directly non-capitalised costs relating to research and development, building renovations, short-term leases, maintenance and repair and any other direct expenditures relating to the day-to-day services of property, plant and equipment.

Operating expenditure (OpEx) includes both the expenditures incurred by LCL as well as for outsourced third parties.

The total OpEx as defined by EU Taxonomy amounted to €4,8 million which includes lease cost, repairs and maintenance, waste recycling cleaning fees, IT services as well as consulting services relating to the day-to-day services of the data centers. The total OpEx as defined by EU Taxonomy is part of the OpEx that is disclosed as part of the financial statements (Code 60/66A of the Annual Accounts)

Nominator:

In order to determine the relevant OpEx for each economic activity, the following costs have been taken into account:

TABLE 9: LIST OF COST PER ECONOMIC ACTIVITY (OPEX)

Activity Number	Activity Description	OpEx
8.1	Data processing, hosting, and related activities	All expenses that directly relate to the provision of customer services and data center maintenance.
6.5	Transport by motorbikes, passenger cars and light commercial vehicles	All expenses that directly relate to the vehicles at the disposal of the staff.

On 31 December 2024, the proportion of eligible and aligned OpEx was 78.42 % and 7.84 % respectively as illustrated in the respective disclosure template.

Capital expenditure

Denominator:

Total capital expenditure (CapEx) as defined by EU Taxonomy includes acquisitions of property, plant and equipment and intangible assets during the current reporting period (Refer to Code 21 and 22/27, Note 6.2 and 6.3 of the Annual Accounts), before depreciation/amortisation and before any remeasurements resulting from revaluations, impairments and fair value adjustments. CapEx also includes acquisition of right of use assets, investment properties and any additions resulting from business combinations.

The total CapEx as defined by EU Taxonomy amounted to €62.5 million it includes the additions for LCL Energy, LCL Belgium as well as LCL Wallonia One.

Numerator:

In order to determine the relevant CapEx for each economic activity, the following CAPEX have been taken into account:

TABLE 10: LIST OF COST PER ECONOMIC ACTIVITY (CAPEX)

Activity Number	Activity Description	CapEx
7.1	Electricity generation from wind power	All additions in LCL Energy NV.
7.3	Installation, maintenance and repair of energy efficiency equipment.	All of the investments made in data centers.
7.4	Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	All of the investments in charging stations.
7.6	Installation, maintenance, and repair of renewable energy technologies	Installations of solar park and windmills.
8.1	Data processing, hosting, and related activities	All CapEx incurred relating to customer data centers.

On 31 December 2025, the proportion of eligible and aligned CapEx was 83.10 % and 15.62 % respectively as illustrated in the respective disclosure template.

3 ESRS E1: Climate change

3.1 GOV-3: INTEGRATION OF CLIMATE-RELATED PERFORMANCE IN INCENTIVE SCHEMES

The implementation of LCL's roadmap and the achievement of our climate change and energy targets are integrated into the performance bonus scheme for all employees through our KPI framework. 23.4% of the KPIs of our performance bonus scheme are directly related to climate change. This ensures that LCL's MT prioritises the climate change agenda.

3.2 E1-1: TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

We have embedded a comprehensive and ambitious climate transition plan in our customer intimacy strategy. Our transition plan aims to achieve an 80% reduction of Scope 1 and 2 GHG emissions by 2030. This target has been validated by the Science-based Targets initiative (SBTi) and aligned with the 1.5°C goal of the Paris Agreement. It responds to the Climate Neutral Data Center Pact (CNDP) climate ambitions and the EU's 2050 climate neutrality goals of the EU Green Deal.

Our commitment to different market and policy frameworks reflects our integral responsibility as a company to reach global decarbonisation efforts and our ambition to be sustainability leaders. Evidence of our commitment is shown by parallel initiatives such as our ISO certifications (14001, 50001) and our EcoVadis Platinum medal 2024.

LCL is not exposed to coal, oil, or gas-related activities through our business operations.

Decarbonisation levers

Data centers are inherently energy-intensive systems. We are implementing several decarbonisation levers and actions to achieve our climate targets and to mitigate our carbon footprint. These measures ensure alignment with scientific benchmarks and sector-specific challenges, providing a clear and feasible roadmap for achieving long-term decarbonisation goals.

- **Renewable Fuels:** We are transitioning to HVO100 renewable fuel to lower emissions linked to emergency power generators, demonstrating an innovative commitment to sustainable energy solutions. Our goal is to transition to 100% HVO100 biofuel by 2029.
- **Reduction of fugitive emissions:** We are adopting refrigerant coolants with a low Global Warming Potential (GWP), such as R1234ze, to minimise climate impact from leakages inherent to cooling operations.
- **Innovative Cooling Design:** We are making design changes when replacing cooling units, targeting leakage reduction and energy savings – one of our main challenges for GHG emission reduction. By changing the type of chiller, we decrease the pipe length and any potential leakages. We will also leverage the cold temperature from the Belgian atmosphere to cool down our data centers when possible, allowing greater reduction of our energy consumption. We aim to upgrade our cooling system at the LCL Brussels-West site by 2025 and the LCL Brussels-North site by 2026.
- **Energy Transition:** We have transitioned all sites to green energy contracts and are increasing our investment in the generation of own renewable. We operate 3,300 solar panels in LCL Wallonia One and have successfully started operating three wind turbines owned by LCL in 2025. In addition, we aim to fully electric our vehicle fleet by 2028.
- **Stakeholder Collaboration:** By working with our customers to adjust expectations and operations, we are driving a culture of sustainability throughout our value chain. We have started a dialogue with stakeholders to improve the diversion rate of our waste (i.e., decreasing the share of waste going to landfill or incineration with energy recovery). We are also changing the operation conditions inside the data centers, including their capability to tolerate higher working temperatures (up to 27°C) to reduce energy demands and emissions.

SCOPE 1 AND 2 GHG EMISSION TRANSITION PLAN (BASELINE 2020)



Financing our transition

To enable the climate transition, we are investing in projects that amount to 35 million euros. These investments are dedicated to efforts mainly focusing on LCL's three strategic climate change pillars: increasing the production of renewable energy, reducing the power usage effectiveness (PUE) of data centers, and reducing our carbon footprint.

LCL's transition plan is fully aligned with the EU Taxonomy objectives for energy efficiency, climate adaptation, and mitigation through well-defined capital (CapEx) and operational (OpEx) expenditures (see EU Taxonomy Chapter). The key investment areas are fully aligned with the decarbonisation levers explained above. During this reporting period, we have not allocated any significant CapEx to coal, oil, or gas-related economic activities.

LCL is not excluded from the EU Paris-aligned benchmarks. Our operations align with the requirements of these benchmarks, reflecting our commitment to transparency and adherence to international sustainability standards.

Decarbonisation challenges

Our primary source of locked-in GHG emissions relates to emergency generators and refrigerants:

- **Emergency generators** ensure sustained operation during extended periods. Currently, fuel-based generators are the most practical solution due to their ability to store fuel for long durations without energy loss. Our transition to HVO100, a renewable diesel, enables a 90% reduction in GHG emissions over the fuel's lifecycle. While this marks meaningful progress, less carbon-intensive alternatives such as hydrogen and battery systems are not yet sufficiently advanced for widespread application in the data center industry.
- **Refrigerant gases** in cooling systems present another critical challenge due to their high GWP. Even minor leaks or accidental releases can result in substantial GHG emissions. To mitigate this, we prioritise the adoption of refrigerants with lower GWP and optimise LCL's piping systems.

Progress of the transition plan

LCL's transition plan is seamlessly embedded in and aligned with our overall business strategy and financial planning. Anchored in our customer intimacy strategy, the plan focuses on adapting LCL's products and services to address the evolving sustainability needs and expectations of our customers. By actively collaborating with customers to co-create sustainable solutions, our transition plan not only reinforces the business strategy but also drives financial objectives and enhances customer-centric value creation.

This transition plan has been approved by LCL's MT and Board, reflecting its integration into our overarching business strategy and financial planning. Progress is closely monitored using KPIs, ensuring transparency and accountability throughout implementation.

Our transition plan is progressing steadily, with several key milestones already achieved:

- **Wind Energy Expansion:** Three wind turbines were successfully installed at the beginning of 2025, a significant achievement reflecting the groundwork laid throughout 2024.
- **Solar Energy Deployment:** Additional solar panels were installed in 2023 at the LCL Wallonia One site, further enhancing renewable energy capacity.
- **HVO100 Implementation:** The transition to HVO100 renewable fuel is underway at two sites, reducing emissions from emergency power generators.
- **Greener Fleet Transformation:** Currently, 19% of the company's vehicles are fully electric, and hybrid and electric vehicles together account for 62% of the leased company car fleet.
- **Cooling System Upgrades:** Projects to enhance cooling systems remain on track, progressing according to the initial planning.

These accomplishments demonstrate our commitment to advancing LCL's transition plan and achieving our sustainability goals.

3.3 SBM-3: MATERIAL IROS AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

The outcomes of the DMA were further analysed through a Climate Risk and Vulnerability Assessment (CRVA). The consolidated results can be found below.

Resilience analysis

As climate-related physical and transition risks intensify, data centers — the backbone of the digital economy — may experience increasing exposure to extreme weather events, energy price volatility and regulatory shifts. We conducted a resilience analysis in 2024 to anticipate, absorb, adapt, and built contingency plans to recover from climate-related disruptions while maintaining core functions.

Our resilience analysis was engaged via a climate risk and vulnerability assessment (CRVA) that encompassed all LCL’s sites and assets, including five data centers, charging stations, solar parks, and wind turbines, with the primary objective of assessing physical and transition risks related to climate change.

The CRVA utilised climate scenario analysis to evaluate (physical and transition) risks and opportunities. For each scenario, four-time horizons were applied: baseline, 2030, 2050, and 2100.

- Physical risks were assessed using three Representative Concentration Pathways (RCPs) (RCP 2.6, RCP 4.5, and RCP 8.5).
- Transition risks used two scenarios of the Network for Greening the Financial System (NGFS) (Net Zero 2050 and Nationally Determined Contributions).

The physical climate risks assessment considered i) the exposure to a climate hazard, and ii) the vulnerability of our assets to such identified hazards. To evaluate the exposure, we first identified potentially relevant climate hazards and then, conducted a location-based assessment to define the exposure of the assets, including all assets linked to EU Taxonomy eligible activities, to these climate hazards. Climate projection data was sourced from

TABLE 11: CLIMATE-RELATED MATERIAL IROS (DMA & CRVA) – FINAL STRUCTURE WITH NA

Category		DMA results	CRVA results
Impacts	Positive impacts	Positive impact of LCL's preparation of innovative climate-resilient infrastructure and practices to assure safety and continuity of activities e.g. installation of flood barriers to protect our data centers from climate change effects.	NA
		The positive impact of LCL's commitment to making all its data centers climate-neutral by 2030 on our own initiative.	NA
		Positive impact of LCL's transitioning to procuring electricity from renewable sources and self-generation.	NA
		Potential positive impact of adopting energy efficiency measures such as Power Usage Effectiveness (PUE) of data centers.	NA
	Negative impacts	Negative impact caused by LCL's CO2 intensive value chain (Scope 3)	NA
Risks		Risk of heat stress impacting the essential cooling-related aspects for the well-functioning of the data centers of LCL's operations.	Physical risk: -Property and equipment damage and possible disruption of operations due to extreme weather (flooding and water-related storms).
		Risk of localised fires leading to property damage and disruption of operations. Especially when the fossil/biofuels stored for the emergency generators catches fire.	
		Risk of exposure to energy-related financial impacts impacting LCL's operational costs. This could be caused by price volatility, regulatory changes of long-term PPAs etc.	Transition risk: -Increased ESG regulation, incl. GHG reduction requirements. -Regulation changes on GWP of refrigerants. -Cost of transitioning to other technologies.
Opportunities		Opportunities linked to LCL's progress on climate change mitigation and decarbonisation creating strategic advantages boosting LCL's reputation, revenue streams, regulatory compliance, better financing conditions, etc.	-Market share gain from being a leader in ESG -Increased interest from investors -Improved efficiency in operations with new technologies
		Opportunity linked to production and storage (batteries, hydrogen, nuclear) of own renewable energy (solar panel park, wind turbines etc.).	
		Opportunity linked to the growing maturity in ESG of clients resulting in clients willing to pay a premium price due to LCL's energy management and other sustainability best practices.	
		Opportunities in cost saving linked to improving energy efficiency and reducing energy consumption (electricity, heating) by redesigning and implementing energy-efficient technologies (cloud and fibre, shifting from diesel to biofuel etc.).	

the World Climate Research Programme (WRCP) initiative Co-ordinated Regional Climate Downscaling Experiment for Europe (EURO-CORDEX), Vlaamse Milieumaatschappij (VMM), Coordination Committee on Integrated Water Policy (CIW) and Service public de Wallonie (SPW).

Once the exposure of each asset was defined for all relevant physical climate risks, we assessed the vulnerability by assigning vulnerability levels to each asset based on potential impact, sensitivity and adaptive capacity of the asset to the risk. These parameters were translated into a vulnerability threshold. Combining the exposure information with the vulnerability thresholds allowed us to define whether an asset had a material risk for a specific hazard. Peer analysis and stakeholder consultation served to further elaborate on the risk and validate the results.

Transition climate-related risks and opportunities (ROs) were identified through a qualitative assessment, based on the DMA results, peer analysis and stakeholder consultation. Once the ROs were identified, we used metrics described within the climate scenario models to evaluate materiality for the different time horizons.

No significant uncertainties were identified in the analysis beyond those inherent to the chosen models.

Based on the outcomes of our resilience analysis, and the incorporation of these ROs in our ERM, LCL will continue to implement mitigation measures, such as flood protection for the wind turbine in Rumst and measures to reduce exposure to flooding at the Brussels South site. These pre-emptive efforts reinforce our commitment to climate resilience and long-term sustainability.

By adhering to high-risk management standards, we ensure that climate change has minimal impact on LCL's operations. Proactively anticipating risk mitigation solutions allows us to maintain our position as a trusted partner for clients, while also securing ongoing financing opportunities for future sustainability initiatives.

SCREENING OF RELEVANT CLIMATE HAZARDS		
	CHRONIC	ACUTE
 TEMPERATURE-RELATED	Changing temperature	Heat wave
	Heat stress	Cold wave / frost
	Temperature variability	Wildfire
	Permafrost thawing	
 WIND-RELATED	Changing wind patterns	Cyclone, hurricane, typhoon
		Storm
		Tornado
 WATER-RELATED	Changing precipitation patterns and types	Drought
	Precipitation and/or hydrological variability	Heavy precipitation
	Ocean acidification	Flood (pluvial, fluvial, coastal)
	Saline intrusion	Glacial lake outburst
	Sea level rise	
	Water stress	
 SOLID MASS	Coastal erosion	Avalanche
	Soil degradation	Landslide
	Soil erosion	Subsidence
	Solifluction	

For more information, see also our sustainability statement, 4.3. SBM-3.

3.4 IRO-1: DESCRIBE THE PROCESS TO IDENTIFY AND ASSESS MATERIAL CLIMATE-RELATED IMPACTS, RISKS AND OPPORTUNITIES

We identified LCL's IROs and their materiality by conducting a structured DMA, following the latest guidelines of the European Financial Reporting Advisory Group (EFRAG). See ESRS 2, IRO-1 for a detailed explanation of the DMA methodology, prioritisation of IROs, stakeholder consultation, validation processes and integration of results into our strategy and ERM framework. We applied the DMA equally to all activities, business relationships, and geographies, using equal assessment criteria for IROs.

Once the results of the DMA yield Climate Change as material, a carbon footprint assessment and a Climate Risk and Vulnerability Assessment (CRVA) were conducted.

We calculated our carbon footprint to better understand our direct and indirect GHG emissions. We defined LCL's operational control and used a GHG emissions matrix to screen emission sources at our own sites (Scope 1 and 2 GHG emissions) and upstream and downstream in the value chain (Scope 3 GHG emissions). We used the Greenhouse Gas Protocol - Corporate Standard to calculate our Scope 1, 2, and 3.

To understand the physical and transition climate risks and opportunities of LCL, a Climate Risk and Vulnerability Assessment (CRVA) was conducted for our own operations and value chain. This assessment provided insights into our exposure to climate hazards for different climate scenarios and time horizons. Time horizons were not defined by market best practices and the expected lifetime of our assets. See ESRS E1, SBM-3 for a detailed explanation of the CRVA methodology and how we defined potential hazards, scenarios used, material exposures of our assets and how exposure and sensitivity were informed by climate scenarios. The results of the CRVA provided a list of climate hazards over the short, medium and long term and a final list of material physical and transition risks and opportunities related to these hazards. Climate projection data was sourced from the World Climate Research Programme (WRCP) initiative Co-ordinated Regional Climate Downscaling Experiment for Europe (EURO-CORDEX), Vlaamse Milieumaatschappij (VMM), Coordination Committee on Integrated

Water Policy (CIW) and Service public de Wallonie (SPW).

Transition-related risks and opportunities (ROs) were assessed qualitatively, based on the DMA results, peer analysis and stakeholder consultation. Once the ROs were identified, we used metrics described within the climate scenario models to evaluate materiality for the different time horizons. In addition, we used a PESTEL framework to ensure we considered all driving forces of potential risks and opportunities.

While the CRVA considers transition and physical risks, these factors are not reflected in our financial projections.

3.5 POLICIES, ACTIONS AND TARGETS

3.5.1 E1-2: Policies related to climate change mitigation and adaptation incl. MDR-P

LCL Climate Change Policy

The LCL Climate Change Policy describes in detail the company's approach to manage the Climate Change Mitigation and Adaptation as well as IROs within our operations and value chain. The aim is to integrate sustainability into all aspects of the business operations to generate a positive contribution for customers, partners, society, and the planet. The Chief Operation Officer and the Chief Project Officer are LCL's most senior representatives with accountability for the implementation of the policy.

The policy applies to all our data centers, including current ones and any future expansions via acquisition of new data centers in or outside of Belgium. The policy considers all the activities within the direct operations of LCL and its suppliers or customers along the value chain. The policy covers Scope 1, Scope 2, and Scope 3 GHG emissions, as well as material ROs associated with climate change.

The policy aims to define how we manage, mitigate, and adapt to the impacts, risks and opportunities of climate change. It addresses our commitments to continually recalculate and report carbon emissions, set SBTi targets, manage material physical risks and

engage in innovative solutions to reduce electricity consumption and overall GHG emissions. This policy covers the actions taken to mitigate our contribution to climate change and to adapt to climate change, ensuring LCL continues to be a trusted partner in the future.

LCL has chosen to adhere to the UN Paris Agreement and the SBTi framework for setting company-wide climate targets. Additionally, our policy refers to the Intergovernmental Panel on Climate Change (IPCC) and the GHG Protocol as key sources for calculating our carbon footprint. Furthermore, the policy has been designed to fully comply with the CSRD's information requirements. While the policy does not explicitly consider the interests of key stakeholders, it clearly states our commitment to growing LCL's business while creating a positive impact on our customers, partners, society, and the planet. The Climate Change policy's first publication and any amendments will be communicated to all employees annually. Our suppliers will be informed about the company's climate change commitments and expectations.

Our commitments

Our commitment towards a holistic approach to climate translates into a wide range of actions. Our policy groups them based on four pillars (see ESRS E1-3 Actions for full details on the actions we are engaging):

- Climate change mitigation: The policy addresses climate change mitigation through an ambitious commitment to set and update our SBTi targets on an ongoing basis.
- Climate change adaptation: The policy addresses climate change adaptation by committing to measure and better understand potential and actual climate physical risks of LCL data centers by 2025. It also outlines a systematic process to ensure the health and safety of employees and customers working in the physical data centers to comply with regulations and adapt their protocols based on the outcomes of climate physical risk assessments.

- Energy efficiency:** The policy addresses energy efficiency by setting a target to reduce the PUE. Additionally, it outlines specific energy management measures, such as installing solar panels and wind turbines to increase renewable energy use and engagement in innovative solutions to reduce the carbon footprint. It also mentions engaging in the reduction of GHG emissions by considering energy management during the construction and renovations of new data centers.
- Renewable energy deployment:** The policy addresses renewable energy deployment by committing to sell self-produced renewable energy and increasing the share of self-produced renewable energy. It details plans to install solar panels in specific data centers and to engage in renewable energy deployment considerations during the design and planning of new data centers. These initiatives demonstrate a focus on increasing the use of renewable energy sources within LCL's operations.

3.5.2 E1-3: Action plans related to climate change mitigation and adaptation incl. MDR-A

As part of our broader sustainability strategy, all actions outlined in our Climate Change roadmap are systematically applied across LCL's managed sites and assets. This ensures a unified and measurable approach to reducing environmental impact while aligning with our long-term sustainability commitments. By implementing these measures consistently, we strengthen our ability to mitigate climate-related risks, enhance operational efficiency, and support industry-wide decarbonisation efforts. Our strategy prioritises the integration of best practices across all facilities, reinforcing our commitment to sustainable data center management.

Use of renewable diesel

LCL is transitioning to HVO100, a renewable fuel, to power our emergency generators instead of diesel. This initiative aligns with our climate policy, directly contributing to LCL's carbon footprint reduction goals. The implementation is being carried out in phases and does not require specific resources. LCL plans to gradually phase out existing diesel reserves. Since diesel consumption for emergency generators accounts for 91.06% of stati-

TABLE 12: LIST OF ACTIONS FOR CLIMATE CHANGE

Targets	Actions	Decarbonisation lever
Reduce LCL's scope 1 and 2 GHG emissions by 80% by 2030 compared to 2020.	Use renewable fuel (HVO100) to power LCL's emergency generators rather than diesel.	Renewable fuels
	Switch to IG100 in the fire suppression systems.	Reduction of fugitive emissions
	Use refrigerant gasses with a GWP<675 or much lower in the data center's cooling systems.	Reduction of fugitive emissions
	Purchase 100% green energy	Energy transition
	Electrify the car fleet	Energy transition
	Install charging points for electric vehicles at four of LCL's sites and increase the number of charging point where needed.	Energy transition
Reduce LCL's Power Usage Effectiveness (PUE) to 1.3 by 2030.	Maximise number of free cooling hours in new cooling designs	Innovative cooling design
	Implement centralised cooling systems (efficiency of scale)	Innovative cooling design
	Allow higher temperatures in server rooms	Innovative cooling design
Produce renewable energy to cover 40% of LCL's electricity consumption from all owned sites by 2030.	Install new solar panels and new wind turbines.	Energy transition
Define a framework of consideration for the construction of LCL's new buildings and renovations by 2026.	Decrease the environmental footprint of our new buildings by engaging in green building frameworks.	Supply-chain decarbonisation
No target associated	Improve LCL's waste policy	Supply-chain decarbonisation
	Follow a supplier screening that considers climate change targets and ambition for supplier selection.	Stakeholder engagement

onary emissions (24.63% of Scope 1 emissions), replacing it with HVO100 will significantly decrease LCL's overall GHG emissions.

As of 2023, we have already installed new HVO100-powered generators at our Aalst and Diegem sites, becoming the first data center company in Belgium to adopt this solution. We have also collaborated with Eneria to modify our existing Caterpillar generators for compatibility with HVO100. The project is ongoing, with 32% of the transition completed (8 out of 16 generators have so far been upgraded in Flanders, with Wallonia to follow). To further enhance sustainability, our older generators are being replaced with more efficient technologies, ensuring long-term emissions reduction and reinforcing LCL's commitment to climate action.

Fire extinguishing system decarbonisation

We are also phasing out Sinorix gas, a hydrofluorocarbon (HFC) with a high global warming potential (GWP), from our gas fire suppression systems and replacing it with IG100, an inert gas composed of pure nitrogen extracted from the air. This transition eliminates potential GHG emissions from fire suppression system use, as IG100 has a GWP of 0 and is not at risk of resources depletion. This initiative aligns with LCL's climate policy and carbon ambitions. As it is an ongoing project with completion rate of 50%, additional investment is required to complete the phase-out in two data centers in Aalst, covering 750kg of materials and preventing 2.4 tons of CO2 emissions. We expect to avoid any increase in GHG in case of fire suppression system activation, reinforcing LCL's preventive and holistic approach to emissions reduction.

Cooling system upgrades

We are upgrading our cooling systems to minimise refrigerant use, reduce leakage risks and optimise energy consumption. This includes shortening piping distances, switching to low-GWP refrigerants such as R1234ze (GWP 7) instead of R410A (GWP 2088) and R407 (GWP 1774), adopting propane chillers for office air conditioning, changing the design of the chillers in our data centers to enable free cooling and allowing higher server room temperatures (up to 27°C). This initiative reduces Scope 1 emissions by minimising refrigerant leaks and lowers Scope 2 emissions by enhancing cooling efficiency. Using low-GWP refrigerants significantly reduces the impact of potential leaks on LCL's carbon footprint, while raising server room temperatures improves PUE, allowing greater reliance on outside air cooling and decreasing energy-intensive chiller use. These measures align with LCL's climate change policy by improving energy efficiency, cutting emissions, and strengthening sustainable operations. This project supports LCL's PUE ratio target of 1.3 by 2030, ensuring lower carbon emissions from leaks and reduced energy costs over time. Bank funding and subsidies finance the Aalst site, while bank funding alone supports the Diegem site. As a result, refrigerant leaks will have a lower carbon impact, stabilising Scope 1 emissions. Chiller usage will decrease, leading to improved energy efficiency and lower electricity consumption across data centers. The project is in the execution phase in Aalst and in the design phase in Diegem, marking a significant step towards LCL's long-term sustainability goals.

Green electricity

We purchase 100% green electricity to eliminate emissions linked to energy consumption in our data centers, significantly reducing LCL's location-based Scope 2 carbon footprint. This initiative aligns with LCL's GHG reduction targets and directly contributes to our policy commitment to minimise Scope 1 and 2 emissions, ensuring a sustainable and low-carbon energy supply. By sourcing only green energy, we have eliminated our Scope 2 emissions, reinforcing progress on LCL's long-term sustainability objectives. This transition began in 2021, before the establishment of an energy coordinator role, which was later introduced to enhance energy management and reporting. The ongoing

purchase of renewable electricity ensures that GHG emissions from electricity use remain at zero, providing long-term consistency in our carbon footprint calculations. Since 2021, we have exclusively sourced green energy across all LCL's operations. In 2024, we appointed an energy coordinator to oversee energy efficiency efforts and the expansion of on-site renewable energy production, further integrating these actions into LCL's sustainability reporting framework to ensure transparency and accountability.

We are expanding LCL's renewable energy production capacity in 2025 by installing new solar panels and wind turbines to generate clean electricity. This initiative supports LCL's sustainability targets by enabling us to sustainably meet our own energy needs while working towards the goal of self-producing 40% of our energy consumption via renewable energy by 2030. The project aligns with LCL's climate change policy by significantly enhancing our renewable energy generation capacity, reducing reliance on external sources. As a result, we expect to see a higher share of self-produced electricity in LCL's overall energy consumption, ensuring that we actively contribute to expanding Belgium's renewable energy infrastructure, rather than simply purchasing green electricity from existing sources. The project is well underway, with three wind turbines (3x2.3 MWp) installed and operational since March 2025, with official handover in April 2025. On the solar front, LCL Wallonia One (Gembloux) commissioned 1,300 additional solar panels in 2023, expanding its solar park to 3,300 panels, producing 1.5 megawatts. These investments mark a key step in LCL's transition to greater energy independence and long-term sustainability.

Electrifying the car fleet

We are electrifying our car fleet by offering only electric vehicles (EVs) to employees, significantly reducing Scope 1 emissions and aligning with our greenhouse gas reduction targets. With the replacement timeline in place, all fuel-powered cars will be phased out by 2028, ensuring that LCL's fleet consists exclusively of hybrid or electric vehicles. This transition supports LCL's climate change policy, which prioritises reducing Scope 1 and 2 GHG emissions, directly contributing to the targets set in the policy. By eliminating fossil fuel-powered vehicles, LCL takes a concrete

step towards lowering its Scope 1 emissions. Our implementation of this initiative does not depend on resource availability, as it is already integrated into LCL's operational structure. As a result, mobile emissions under Scope 1 will steadily decrease, providing a long-term reduction in LCL's carbon footprint. Since 2024, our car policy has been updated to allow only EVs as company car options. Operating under an operational lease model, this shift requires no CapEx, and budgets for different employee categories have been increased by approximately 25% to support the electrification of the fleet and facilitate the transition.

We are expanding LCL's EV charging infrastructure by installing charging points at four of our sites and increasing the number of charging stations where needed. This initiative enhances convenience for employees and visitors using EVs, encouraging a broader transition away from fuel-powered vehicles and directly reducing Scope 1 mobile GHG emissions. By supporting the adoption of electric mobility, this action contributes to lowering the carbon footprint of other entities, further demonstrating LCL's broader commitment to environmental sustainability. This project aligns with our climate change policy, which prioritises reducing Scope 1 and 2 emissions, helping us to meet our GHG reduction targets. By facilitating EV usage, we are lowering Scope 1 emissions, contributing to a sustained reduction in mobile emissions. The project is fully funded, with an allocated and available budget to support implementation. The first phase has been completed, and the second phase is in the pre-contractual stage with the contractor, ensuring continued progress towards LCL's sustainable mobility objectives.

Green buildings

We are engaging in green building frameworks to assess and implement environmentally sustainable options for the construction and renovation of our buildings, supporting LCL's commitment to reducing its environmental footprint. This initiative aligns with our climate change policy, contributing to a holistic approach to sustainability in its operations. By integrating green building principles, we are actively working towards LCL's goal of establishing a structured green building framework, ensuring long-term energy efficiency and carbon reduction. The expected impact includes a lower carbon footprint associated with both the construction of

new buildings and the operation of renovated facilities, helping to reduce overall emissions. The allocation of resources will vary depending on the specifics of each project, ensuring flexibility in implementation. We are currently exploring the available green building frameworks applicable to data centers, marking the initial phase of this sustainability-driven initiative.

Waste management

We are actively working on waste management and recycling programmes to reduce our waste while also supporting customers in the recycling of hardware. Although this initiative is not directly associated with a specific carbon reduction target, it contributes to sustainability efforts by minimising landfill waste. Waste management and recycling align with LCL's carbon emissions reduction policy, with a primary focus on reducing non-diverted waste. Currently, all non-recycled waste streams in Belgium are directed to waste-to-energy treatment but LCL wants to minimise the share of waste processed using this method. Implementation relies on improved waste management strategies and does not require additional resources. The project is progressing, with an assessment already completed for waste management in both data centers and office spaces. We are enhancing office sorting practices and exploring alternative equipment options to minimise waste production during operations in our data centers. We have also engaged with our clients to understand their waste management needs, integrating these insights into the development of our new waste management policy.

Sustainable procurement

LCL follows a supplier screening process that integrates climate change targets and ambitions into supplier selection as part of our Sustainable Procurement Policy. By evaluating suppliers on sustainability criteria, we aim to drive improvements across our supply chain and gain better visibility into LCL's Scope 3 emissions. This approach encourages responsible practices among partners while supporting LCL's broader environmental objectives. The initiative aligns with the Scope 3 ambitions outlined in LCL's climate change policy by promoting sustainability throughout the value chain. By assessing our suppliers' environmental performance, we can make informed decisions that contribute to reducing our Scope 3

emissions. We expect to see a continuous reduction in Scope 3 emissions as suppliers enhance their sustainability efforts or whenever LCL selects new, more sustainable suppliers. To facilitate this process, we have recruited a procurement specialist to ensure the finance department has the necessary resources to conduct a comprehensive supplier screening in 2025. The Sustainable Procurement Policy was developed in 2024, with team reinforcement through the specialist's recruitment in mid-2024. Early adoption has already begun and full implementation is planned for early 2025.

TABLE 13: LIST OF DETAILED ACTIONS FOR CLIMATE CHANGE

Action	Taken or planned	Start execution date	End execution date	Resources (man days)	GHG reduction achieved	Additional GHG reduction expected	CapEx one off	OpEx one off	OpEx recurring
Use renewable fuel (HVO100) to power LCL's emergency generators rather than diesel.	On-going	2022	2029	59		75 tCO2e/year	0€	Not material	Not material
Replace Sinorix gas by IG100 in the fire suppression systems.	On-going	2024	2025	569 (one-off)	9648 tCO2e phased out	10.000 tCO2e	950 k€	Not material	Not material
Cooling systems improvement	On-going	2024	Aalst: 2025, Diegem 2026	1,118.4 (one-off)		404.7 tCO2e	17,202 k€	Not material	Not material
Purchase 100% green energy	Taken	2023	2023	30	3,591.63 tCO2e		0€	Not material	Not material
Electrify the car fleet	On-going	2023	2028	5 (one-off) 5 /year	30.45 tCO2e		0€	Not material	Not material
Install charging points for electric vehicles at four of LCL's sites and increase the number of charging point where needed.	On-going	2023	2025	50 (one-off) 2 /year	Not applicable	Not applicable	738 k€	Not material	Not material
Install new solar panels and new wind turbines.	On-going	2023	2025	139.8 (wind) + 136.25 (solar) = 276.05	Not applicable	Not applicable	3873 k€ (solar) 13,270 k€ (wind turbines)	Not material	Not material
Decrease the environmental footprint of our new buildings by engaging in green building frameworks.	Planned	2025	2026	5 (one-off) 13 /year	Planned	Planned	Planned	Not material	Not material
Improve LCL's waste policy	Planned	2025	2025	50 (one-off) 5 /year	Planned	Planned	Planned	Not material	Not material
Follow a supplier screening that considers climate change targets and ambition for supplier selection.	On-going	2024	2025	0.5 FTE (sustainable procurement specialist)	Planned	Planned	0€	40 k€	120 k€/year

3.5.3 E1-4: Targets related to climate change mitigation and adaptation incl. MDR-T

Our climate-related targets are designed to align with LCL's Climate Change Policy and are driven by the IROs identified through the DMA. These targets are applied consistently across all LCL-managed sites and assets, with no geographical exclusions, ensuring a unified approach to sustainability across operations. Baseline values have been established at the company level rather than for specific sites or activities, allowing for a comprehensive and standardised measurement framework to track progress effectively.

Target: Achieving an 80% reduction in Scope 1 and 2 GHG emissions by 2030.

Following a previous target to reduce 42% of Scope 1 and 2 GHG emissions by 2030, we have decided to increase our ambition and commit to a reduction of Scope 1 and 2 GHG emissions by 80% by 2030 compared to 2020. This target reflects our strategic focus on climate change mitigation and decarbonisation and is associated with opportunities on LCL's progress on creating strategic advantages that include improving LCL's reputation, revenue streams, regulatory compliance, and financing conditions. The target specifically addresses direct emissions from LCL's operations (Scope 1) and indirect emissions from purchased electricity, heat, or steam (Scope 2). An 80% reduction by 2030 has been established as the target level, using the SBTi methodology, with 2020 as the baseline year.

To achieve this goal, LCL is investing in renewable energy, energy-efficient technologies, and operational improvements. Stakeholder engagement, including employees and sustainability experts, played a key role in ensuring the target is both ambitious and feasible. Our Scope 1 and 2 emissions are evaluated with the support of external experts on a yearly basis.

Progress on this target is tracked as a KPI, periodically reviewed by our MT. With a significant reduction in Scope 2 emissions—a major contributor to LCL's overall carbon footprint—we have already made substantial progress towards this goal. Additional measures are being implemented to address all remaining emis-

sion sources, ensuring LCL stays on track to achieve its target.

Target: Producing renewable energy to cover 40% of our electricity consumption from all LCL-owned sites by 2030.

This target gives LCL a proactive role in increasing renewable energy production and addresses key risks and opportunities of the company. Mitigating climate change, enhancing energy security through self-generation, reducing exposure to energy price volatility and regulatory changes are among those risks. The target is also linked to the positive impact of LCL's transition to procuring electricity from renewable and self-generated sources; the opportunity linked to production and storage of our own renewable; and the risk of exposure to energy-related financial impacts.

While we have used 100% green electricity from various sources since 2021, this target specifically measures our investments in additional renewable energy production capacity, ensuring a tangible contribution to expanding renewable energy infrastructure. LCL's strategy to reach this target is based on leveraging on-site renewable energy generation through solar panels and wind turbines, guided by feasibility studies, environmental assessments, and ongoing data evaluations. The target was developed with input from regulatory bodies, energy market analysts, and local communities to ensure compliance and shared benefits.

No modifications have been made to the target since its inception. Progress is monitored through internal KPIs reviewed periodically by management. To meet our target, we have made significant investments to expand our solar farm in Gembloux and install three wind turbines, which will substantially increase LCL's share of self-produced renewable electricity.

Target: Reducing LCL's PUE to 1.3 by 2030.

This target aims to improve the energy and operational efficiency of our data centers. It target addresses key risks and opportunities, including the potential positive impact of adopting energy efficiency measures such as PUE on data centers; and the cost-saving opportunities linked to improving energy efficiency and reducing energy consumption (electricity, heating) by redesigning and implementing energy-efficient technologies (cloud and fibre; shifting from diesel to biofuel).

PUE is a key industry metric measuring energy efficiency in data centers, with lower PUE reflecting better energy performance. The target level aligns with best practices in sustainable data center management. The methodology to set this goal includes an industry wide discussion and commitment through the Climate Neutral Data Center Pact (CNDP). The target was developed through collaboration with technical teams, energy consultants, and clients to ensure feasibility and alignment with business objectives. No modifications have been made to the target since it was established and LCL's MT is monitoring its progress through periodic KPI reviews. We have already implemented significant energy efficiency projects, with a particular focus on enhancing cooling system performance to drive continuous improvements towards the 2030 objective.

Target: Implement climate adaptation measures annually to address all material risks identified in the CRVA.

This target addresses key risks and opportunities, including the positive impact of LCL's preparation of innovative climate-resilient infrastructure and practices to assure safety and continuity of our activities, such as the installation of flood barriers to protect the data centers from climate change effects; the risk of heat stress impacting the essential cooling-related aspects for the well-functioning of our data centers; and the risk of localised fires leading to property damage and disruption of operations - especially should the fossil/biofuels stored for the emergency generators catch fire.

The target ensures proactive adaptation to climate risks by activating initiatives to prevent impacts of natural disasters, supporting our commitment to operational resilience and stakeholder safety and ensuring continuous progress on climate adaptation efforts. This target was set based on the methodology used for the DMA and CRVA, focusing on flood prevention, heat-resilient infrastructure, and enhanced cooling systems. This target guides LCL in prioritising climate adaptation projects, ensuring strategic investment in risk mitigation. No modifications have been applied to this target since it was established and our MT monitors its progress through periodic KPI reviews. In 2024, we conducted a climate risk assessment to identify priority projects and already invested in flood prevention measures at high-risk sites, demonstrating a proactive approach to preparing for climate challenges.

TABLE 14: LIST OF TARGETS FOR CLIMATE CHANGE

Target	Absolute / Relative	Unit of measurement	Base year	Base year value	Target year
Achieve a 80% reduction in Scope 1 and 2 GHG emissions	Relative	tCO2e	2020	1,557.58	2030
Produce renewable energy to cover 40% of its electricity consumption *	Relative	% of total kWh consumption	NA	4.73%	2030
Reduce Power Usage Effectiveness (PUE) to 1.3	Absolute	NA	2022	1.54	2030
Implement at least two climate adaptation measures annually	Absolute	NA	2024	2	Yearly
Define a framework of consideration for the construction of LCL's new buildings and renovations by 2026.	Absolute	1	2024	NA	2026
Commits to analyse and reduce its scope 3 emissions	NA	NA	2024	2025	2025

* Excluding cloud division

Additional targets

Two additional qualitative targets have been defined for LCL:

- Define a framework of consideration for the construction of LCL's new buildings and renovations by 2026.
- Commits to analyse and reduce its scope 3 emissions.

These two targets come from the results of the DMA and will be further explored and explained in the next reporting year.

3.6 METRICS

3.6.1 E1-5: Energy consumption and mix.

Total energy consumption related to own operations: 33,105.29 MWh

- **Energy consumption from fossil sources: 200.39 MWh**
 - › Fuel consumption from crude oil and petroleum products: 153.47 MWh
 - › Fuel consumption from natural gas: 46.92 MWh
 - › Fuel consumption from coal and coal products: 0 MWh
 - › Fuel consumption from other fossil sources: 0 MWh
 - › Fuel consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources: 0 MWh
- **Share of fossil sources in total energy consumption: 0.60%**
- **Energy consumption from nuclear sources: 0 MWh**
- **Share of consumption from nuclear sources in total energy consumption: 0%**
- **Energy consumption from renewable sources: 32,904.90MWh**
 - › Biomass (including industrial and municipal waste of biologic origin), biofuels, biogas, hydrogen from renewable sources, etc.: 120 MWh
 - › Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources: 32,093.03 MWh
 - › Consumption of self-generated non-fuel renewable energy: 692.15 MWh
- **Share of renewable and low-carbon sources in total energy consumption: 99.39%**

LCL's core business, data center operation, is not recognized as a high impact sector from the list established by NACE.

3.6.2 E1-6: GHG emissions inventory (scope 1, 2 and 3)

- **Greenhouse gases emissions in FY2024: 13,502.3 tCO₂e**
 - › Scope 1: 484.45 tCO₂e
 - No distinction is made between the location and market-based calculations.
 - › Scope 2:
 - Market based: 8.48 tCO₂e
 - Location based: 3,600.11 tCO₂e
 - › Scope 3: 13,502.03 tCO₂e
- Category 1. Purchased goods and services – Emissions from the extraction, production, and transport (i.e., cradle-to-gate emissions) of goods and services acquired by a company in the reporting year, not otherwise included in another upstream category: 51.90 tCO₂e.
- Category 2. Capital goods – Extraction, production, and transport of capital goods purchased or acquired by the company in the reporting year. Capital goods are goods, e.g., plant, property, and equipment that the company uses to provide its service and would include buildings: 13,053.14 tCO₂e.
- Category 3. Fuel and energy related activities – Extraction, production, and transport of fuels and energy purchased or acquired by the company in the reporting year, not already accounted for in scope 1 or 2: 368.80 tCO₂e.
- Category 4. Upstream transport and distribution – Transport and distribution of products purchased by a company in the reporting year between suppliers and its own operations (in vehicles and facilities not owned or controlled by the company): 3.06 tCO₂e
- Category 5. Waste generated in operations – Disposal and treatment of waste generated in the company's operations in the reporting year (in facilities not owned or controlled): 8.09 tCO₂e.
- Category 6. Business travel – Transportation of employees for business-related activities during the reporting year (in vehicles not owned or operated by the company): 7.61 tCO₂e.
- Category 7. Employee commuting – Transport of employees between their homes and their worksites during the reporting year (in vehicles not owned or operated by the company): 9.70 tCO₂e

- **Biogenic emissions: 0 tCO₂e**
- **Share of Scope 1 emissions from regulated emissions trading scheme: 0%**
- **GHG emissions intensity: 0.466694 tCO₂e / k€**
- **Net revenue: EUR 29,988,024.00**
 - The net revenue can be found in the financial statements of LCL's sustainability report.
 - Net revenue (other): EUR 0
 - Total net revenue (from the 2024 financial statements): EUR 29,988,024.00

LCL's carbon footprint was calculated following the GHG Protocol Corporate Standard, which outlines the methodology for measuring and reporting emissions across different scopes. The carbon footprint is computed for the entire scope of LCL's activities and is not disaggregated by accounting group.

Disclosing information is disaggregated by investees such as associates, joint ventures, or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the consolidated accounting group, as well as contractual arrangements that are joint arrangements not structured through an entity (i.e., jointly controlled operations and assets), for which it has operational control is not applicable to LCL. All these emissions happen in Belgium as part of LCL's activities as a provider of reliable data center infrastructure and services. For Scope 1, 2, and 3 calculations, no assumptions were required as LCL had access to reliable data. Emission factors were derived from two primary sources:

- Spend-based emission factors (kg CO₂e/EUR) from the Exiobase open LCA database, used for Scope 3, Category 1 (Purchased Goods and Services) and Category 2 (Capital Goods).
- Mass- or amount-based emission factors from EcolInvent 3.10, applied to Scope 1, Scope 2, and Scope 3, Categories 3 (Fuel and Energy-Related Activities), 4 (Upstream Transport and Distribution), 5 (Waste Generated in Operations), 6 (Business Travel), and 7 (Employee Commuting).

According to the GHG Protocol, primary data refers to data collected directly from LCL's activities, such as measurements, invoices (e.g., electricity consumption), mass balances, or internal

calculations. Only primary data was used for Scope 1, 2, and 3 emissions calculations. Secondary data is used when primary data is unavailable. This includes internationally recognised databases and scientific literature to make valid estimates.

In cases where EcolInvent 3.10 did not provide an exact match for a required emission source or when only monetary values were available, Environmental Extended Input-Output (EEIO) tables were used. These tables convert financial expenditures into GHG emissions but have a higher level of uncertainty. Consequently, EEIO estimates were only applied when mass, quantity, or material-specific data were not available. All data provided by LCL is considered primary data, ensuring high reliability. Additionally, the internationally recognised EcolInvent 3.10 database was used to process secondary data where necessary. The supplied information was assessed for quality according to the GHG Protocol - Corporate Standard to ensure accuracy and compliance.

3.6.3 E1-7: GHG removal and storage activities.

LCL does not use GHG removal and storage solutions to cover emissions of GHG from our own operations.

3.6.4 E1-8: Internal carbon pricing schemes.

LCL does not use an internal carbon pricing scheme.

4 ESRS S1: Own workforce

LCL's workforce is a cornerstone of our operations and success. We are fully committed to understanding and meeting our employees' needs and expectations. By integrating workforce strategies and sustainability goals, LCL fosters an environment in which employees are empowered to make meaningful contributions to our mission and long-term vision.

4.1 SBM-3: OWN WORKFORCE AND ITS INTERACTION WITH STRATEGY AND BUSINESS MODEL

Through the 2023 DMA process, we identified that the ESRS standard S1: Own workforce is material for LCL. Ten material IROs were identified, encompassing all individuals within our workforce. Stakeholders subject to material impacts includes both employee workers (permanent, temporary) and non-employee workers (self-employed). LCL does not engage with workers provided by third parties. The list of material IROs is presented in the table on the right.

The material positive impacts identified highlight our commitment to positively affecting our employees. This includes maintaining high workplace safety standards, fostering a culture that supports both mental and physical well-being, and ensuring continuous and meaningful engagement with employees. We are also actively working to increase female representation in our workforce and on our Board, promoting diversity and inclusion across our entire organisation. These positive impacts extend beyond specific sites and apply to all LCL employees, regardless of role, status, or contract type.

The DMA also highlighted significant ROs related to impacts on LCL's workforce. The identified risks include the potential loss of key roles, higher turnover in middle management, a shortage of specific skill profiles essential for business continuity and innovation, and communication gaps between departments that hinder collaboration, knowledge sharing, and overall work efficiency. Conversely, our commitment to LCL's ESG agenda presents an opportunity to attract new talent, and initiatives aimed at fostering innovation through diversity are expected to benefit employees

of various backgrounds, ages, and experience, by leveraging a broad range of perspectives and skills.

The DMA considered specific IROs associated with employees working in particular contexts or performing certain activities that may expose them to greater risks. For example, we identified the risk of higher turnover specifically in middle management. Similarly, the opportunity to attract new talent through the ESG agenda pertains to a specific segment of the emerging workforce.

No material impacts on LCL's workforce are anticipated as a result of transition plans aimed at reducing negative environmental impacts and achieving greener operations.

TABLE 15: MATERIAL IMPACTS, RISKS AND OPPORTUNITIES FOR OWN WORKFORCE

ESRS sub-topic	ESRS sub-sub-topic	IRO type	IRO description
Working conditions	Health and safety	Potential positive impact	Potential positive impact on mental and physical well-being of employees as outcome of LCL's focus to create a culture of healthy employees.
Working conditions	Health and safety	Positive impact	Positive impact linked to providing trainings and various initiatives resulting in minimised risks and high workplace safety. LCL is very active in safety as it is their core business.
Working conditions	Health and safety	Positive impact	Positive impact of employee consultation e.g., the satisfaction survey of all employees which gives a lot of insights on employees' feelings and LCL's point of improvements.
Working conditions	Work-life balance	Risk	Risks of losing key roles (especially middle management) due to a concentration of workload and increased employee turnover.
Equal treatment and opportunities for all	Training and skills development	Positive impact	Positive impact linked to the development of the skills of employees through conversation and development of a personal plan linked to ESG trainings.
Equal treatment and opportunities for all	Training and skills development	Risk	Risk of a lack of availability of specific profiles needed for business continuity and innovation. The war on talent (human resource processes, recruiting goals and monitoring) could eventually result in lack of adequate employees.
Equal treatment and opportunities for all	Training and skills development	Opportunities	Opportunities linked to empowering innovation through diversity in human capital (background, age, experience etc.), proper training and well-established culture and processes.
Equal treatment and opportunities for all	Training and skills development	Opportunities	Opportunity of attracting new talent due to the efforts of LCL in the ESG agenda.
Equal treatment and opportunities for all	Training and skills development	Risk	Risks linked to lack of communication between LCL's departments affecting talent management by limiting collaboration and knowledge sharing and work efficiencies, potentially impacting employee development.
Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	Positive impact	Potential positive impact of pursuing inclusion of females in the workforce and the Board.

4.2 POLICIES, ACTIONS AND TARGETS

We have implemented a comprehensive set of policies, targets, and actions to effectively address and mitigate our key IROs.

4.2.1 S1-1: Policies related to own workforce incl. MDR-P

LCL has two policies which aim to prevent, mitigate, and remediate actual and potential impacts, to address risks and to pursue opportunities within LCL's workforce. The policies are the Diversity, Equity, and Inclusion (DEI) Policy and the Health & Well-being Policy. The Chief Human Resources Officer is at the most senior level of accountability for the implementation of these policies. The policies are made available to all LCL employees - regardless of their role, status, or contract type - to ensure that all potentially affected stakeholders have access to relevant resources related to material issues.

An overview of the policies is presented in the table below. The table also includes the material IROs related to each policy.

DEI policy

The DEI policy aims to eliminate discrimination and harassment, promote equal opportunities, advance diversity, and inclusion, and ensure a healthy and productive workplace. The policy guarantees non-discrimination on the basis of: age, gender, sexual orientation, ethnicity/nationality, religion, disability, medical history, and political opinion. The policy states our commitment to prevent and resolve any form of harassment against LCL employees and outlines preventive and positive actions to ensure fairness in all processes of employment, including recruitment, training & development, performance evaluation, promotion, remuneration, and termination of service.

The scope of the DEI policy extends to all of LCL's employees, applicants, consultants, stakeholders, partners, and visitors, including people from under-represented groups who are traditionally disadvantaged in the workplace. While the policy does not explicitly reference specific third-party standards, it aligns with broader industry best practices aimed at promoting DEI and ensuring equal treatment and opportunities for all. This policy reflects a commitment both employees and non-employee workers by promoting

equal opportunities, setting specific targets, monitoring compliance, and enforcing disciplinary actions to create a respectful and inclusive workplace environment.

Our DEI policy includes a specific commitment to actively pursue gender equality and outlines governance procedures, ensuring HR is immediately informed in case of suspicion of a violation. The policy also details a complaint procedure through which employees can raise concerns and includes monitoring and review processes to ensure compliance with the policy and targets.

Health & Well-being policy

The Health & Well-being policy aims at promoting a safe work environment, encouraging a healthy lifestyle, providing resources to enhance physical and mental health. The policy considers the interest of employees through its holistic and systematic range of initiatives and commitments aimed at improving both, personal and work-related considerations for employees. It applies to all employees - regardless of their role, status, or contract type - and includes health and safety considerations beyond the identified material IROs. Furthermore, the policy ensures the protection and respect of human rights through alignment with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

Workplace accident prevention

The Health & Well-being policy demonstrates LCL's commitment to workplace accident prevention and safety. LCL strives for safe and healthy conditions for every person who works at the company and emphasises that health and safety is both a right and a duty for employees and employers. In addition, LCL developed a 'Welcome brochure: Safety' aimed at limiting and preventing risks in the areas of safety, health, and the environment.

LCL's human rights commitments

LCL's commitment to upholding and respecting human rights is evident across our DEI and Health & Well-being policies, reflecting our general approach to ensuring respect for human rights within

our workforce. These policies form the foundation of our commitment to promoting a workplace environment that values and respects the human and labour rights of our employees.

The DEI policy outlines our commitment to engaging with LCL's workforce through communication and education on diversity, equity, and inclusion topics and offers a procedure for employees to report violations or request intervention. Similarly, LCL's Health & Well-being policy emphasises engagement with our workforce through various health initiatives, aimed at creating a close-knit and safe work environment. Both policies emphasise the responsibility of LCL's Management Team to provide processes and mechanisms to monitor and activate procedures with internationally recognised instruments and frameworks, demonstrating a commitment to remedial action for any human rights impacts.

Furthermore, the alignment of these policies with relevant internationally recognised instruments, including the UN Guiding Principles on Business and Human Rights, reinforces our dedication to upholding human rights standards in LCL's operations. The incorporation of preventive actions, compliance with equal opportunities legislation, and a complaint procedure for employees in both policies demonstrates our commitment to respecting the human rights and labour rights of our workforce, in line with internationally recognised standards and guidelines.

It is important to note that human trafficking, forced labour, and child labour are not subjects addressed by LCL's policies. This omission is due to these topics not being material for LCL's operations and value chain.

4.2.2 S1-2: Processes for engaging with own workforce

LCL's size and culture facilitate a lean and continuous engagement with our employees. Employee satisfaction surveys assess well-being, motivation, and areas for improvement. This survey consists of a comprehensive questionnaire, covering various aspects such as physical working conditions, work atmosphere, camaraderie, and team events. The survey has been conducted each year since 2023 and serves as baseline to understand employee sentiments.

We also foster ongoing communication between managers and their teams across departments, ensuring that any short-term concerns are promptly addressed and resolved. The engagement occurs directly through the employee’s direct manager and Chief Human Resources Officer.

In close communication with middle management and the HR department, LCL’s MT is in charge of ensuring operational responsibility of engagement processes. The effectiveness of this engagement is assessed through the percentage of employees completing the survey, which accounted for 95% representation in 2023 and for 92% in 2024. There is no specific mention of steps taken to gain insight into the perspectives of people who may be particularly vulnerable to impacts or marginalised.

4.2.3 S1-03: Processes to remediate negative impacts and channels for own workforce to raise concerns

We are committed to preventing and resolving any form of harassment or discrimination against our employees and have policies in place to protect them against retaliation.

In case of a breach or infringement of policies, the HR department is in charge of the investigation and of taking immediate action to protect any victims of discrimination. These issues can be raised directly through employee’s line manager, the internal confidential advisors, the Chief Human Resources Officer, or the general manager. Multiple awareness and training sessions, including the onboarding, ensure that employees are aware of and understand the processes to file a complaint and how they are protected.

4.2.4 S1-4: Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions incl. MDR-A

We have implemented key actions to ensure adequate management of LCL’s employee-related IROs. These actions are implemented in all locations in which LCL operates until 2025 and affect all employees and stakeholders with direct involvement in LCL’s operations. A summary of the key actions taken and/or planned is presented in the table below.

TABLE 16: LIST OF ACTIONS FOR OWN WORKFORCE

Key action	Expected outcomes	Related to policy	Related to targets
Continuously refresh the safety trainings and implement new initiatives based on identified risks.	To enhance employee knowledge and awareness of safety protocols, leading to a reduction in workplace accidents and incidents.	Health and Well-being policy	Engage 10 trainings that promote safety every year.
Organise one initiative promoting health and well-being every quarter.	Improved employee health, morale, and overall well-being.		Implement 4 initiatives that promote health and well-being every year.
Define action points coming out of the survey to improve employee’s engagement.	To provide a positive impact on employee retention, satisfaction, and overall engagement.		Achieve an employee satisfaction survey above the top 20% of the industry.
Review and update job descriptions to include sustainability as a core value in job postings.	To promote a culture of sustainability across all positions.		Achieve 100% of job vacancies to include sustainability as a core value of LCL yearly.
Develop a training plan for each employee that aligns with their career goals and the organisation's needs.	To enhance employee skills, performance, and alignment with organisational objectives.		Invest in employee skills through at least 6 training days per year per employee starting in 2023.
Engage discussion and create action points with the stakeholders.	To improve collaboration, alignment, and communication across the organisation.		Achieve a score above 6/10 on communication between different department/teams for 90% of the employees.
Conduct employee engagement surveys to assess satisfaction and identify areas for improvement and implementing initiatives.	To address employee concerns, improve satisfaction, and enhancing overall engagement.	DEI policy	Achieve an employee satisfaction survey above the top 20% of the industry.
Establishing diversity goals and regularly monitoring and reporting on progress towards achieving gender balance in the workforce.	To foster diversity, inclusion, and gender balance at all levels of the organisation.		Reach and maintain a gender balance with at least 40% representation of each gender among all employees (in 2030).
Training of the managers on biases.	To foster diversity, inclusion, and gender balance at all levels of the organisation.		Reach and maintain a gender balance with at least 40% representation of each gender among all employees (in 2030)
Training for all employees on unconscious biases to increase awareness on diversity.			

We diligently track and assess all our initiatives towards employees. Dedicated KPIs on safety, well-being, skill development, employee engagement, and diversity and inclusion serve as benchmarks for measuring the effectiveness of our actions and initiatives, providing quantitative data to track progress over time. Periodic independent audits and reviews are also conducted to provide an independent assessment of the overall effectiveness of our actions and initiatives. This comprehensive tracking approach ensures that we can consistently evaluate the impact and efficacy of our efforts and identify opportunities for improvement.

We ensure that LCL’s own practices do not harm our workforce by proactively managing any tensions related to business pressures. We prioritise ethical and sustainable practices, focusing

on the well-being and rights of our employees. To achieve this balance, we implement clear policies, conduct risk assessments, engage with stakeholders, and constantly monitor and review our processes to address and mitigate any conflicts.

For the action related to training, initiatives have been specially dedicated to safety training with specific attention towards employees involved in operational activities. The ongoing effort in safety training has resulted in a yearly increase in training sessions between 2022-2024.

The current and future financial and other resources allocated to the action plan are not available for the reporting year of 2024.

4.2.5 S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities incl. MDR-T

We have set specific targets related to our workforce across all LCL's operations. Stakeholder input from the DMA was considered, although no specific methodologies were used, and significant assumptions were made to define and set these targets. As such, the targets are related to social matters and are not founded on scientific evidence. No changes in targets and corresponding metrics were adopted within the defined time horizon.

A summary of the defined target is presented in the table on the right.

Our monitoring and reporting on disclosed targets involve providing information on how targets are reviewed, detailing significant actions and changes in performance, demonstrating LCL's dedication to transparency and accountability in tracking progress.

Engagement with its own workforce

LCL's target-setting process involves a comprehensive approach that considers the well-being, empowerment, and dedication of our workforce. To set these targets, we have engaged directly with our workforce and relevant internal stakeholders to understand their needs, values, and aspirations. This engagement took the form of feedback sessions, employee surveys, and consultations.

We use performance management systems, feedback mechanisms, and regular assessments to track progress of our targets. In evaluating LCL's performance against targets, we seek to identify lessons, improvements, and best practices through direct engagement with our workforce or workers' representatives.

TABLE 17: LIST OF TARGETS FOR OWN WORKFORCE

Target	Absolute/ Relative	Baseline year	Baseline value	Time horizon	Contribution to policy	Metric (KPIs)
Propose 10 trainings that promote safety every year.	Absolute	2024	9	2030	Health and Well-being policy	Number of initiatives that included health and safety.
Propose 4 initiatives that promote health and well-being every year.	Absolute	2024	4	2030	Health and Well-being policy	Number of initiatives that included health and well-being.
Voluntary turnover below 5%	Relative	2024	4.13	2030	Health and Well-being policy	Voluntary turnover of employees
Achieve an employee satisfaction survey in the top 20% of the industry.	Relative	2023	87	2030	Health and Well-being policy	Employee satisfaction survey score
Achieve 100% of job vacancies to include sustainability as a core value of LCL yearly	Absolute	2024	100%	2030	Health and Well-being policy	Percentage of job vacancies that include sustainability as a core value of LCL
Invest in employee skills through at least 6 training days per year per employee starting in 2023	Absolute	2022	4.58	2030	Health and Well-being policy	Number of training days per employee
Achieve a score above 6/10 on communication between different department/teams for 90% of the employees.	Relative	2023	74%	2030	Health and Well-being policy	Score on communication between different department/teams
Reach and maintain a gender balance with at least 40% representation of each gender among all employees by 2030	Relative	2022	0.24	2030	DEI policy	Percentage of female and male
Reach and maintain a gender balance with at least 40% representation of each gender among Board members and all employees in managerial positions by 2030.	Relative	2022	0.24	2030	DEI Policy	Percentage of female and male

4.3 METRICS

4.3.1 S1-6: Characteristics of the undertaking's employees

TABLE 18: NUMBER OF EMPLOYEE HEADCOUNT MEASURED BY GENDER IN 2024

Gender	Number of employees (headcount) per gender 2024	Average number of employees (headcount) per gender
Male	36	36.07
Female	13	12.34
Other	0	0
Not reported	0	0
Total employees	49	48.41

TABLE 19: NUMBER OF EMPLOYEE HEADCOUNT MEASURED BY COUNTRY IN 2024

Country	Number of employees (headcount) 2024	Average number of employees (headcount) per country
Belgium	48	47.41
Netherlands	1	1

TABLE 20: LIST OF EMPLOYEE INFORMATION MEASURED BY CONTRACT TYPE, BROKEN DOWN BY GENDER IN 2024.

Female	Male	Other	Not disclosed	Total
Number of employees (head count/FTE)				
(13/12.5)	(36/35.8)	0	0	(49/48.30)
Number of permanent employees (head count/FTE)				
(13/12.5)	(35/35.8)	0	0	(48/48.30)
Number of temporary employees (head count/FTE)				
0	0	0	0	0
Number of non-guaranteed hours employees (head count/FTE)				
0	0	0	0	0

TABLE 21: NUMBER OF EMPLOYEE HEADCOUNT MEASURED PER REGION IN 2024.

Region	Number of employees (headcount) 2024	Average number of employees (headcount) per country
LCL Brussels-North (Diegem), Belgium	42	41.08
LCL Belgium (Netherlands)	1	1
LCL Wallonia One (Gembloux)	6	5.33

TABLE 22: NUMBER OF EMPLOYEE HEADCOUNT WHO HAVE LEFT THE UNDERTAKING IN 2024.

Total number of employees who have left the undertaking during the reporting period	3
The rate of employee turnover in the reporting period	6.32

Regarding the methodologies and assumptions used to compile the data on employees, the total number of employees who have left the undertaking are reported in headcount. The turnover number is reported at the end of the reporting period. The rate of employee turnover is calculated by using the total of employees who left the undertaking and dividing it by the average headcount during the reporting period.

4.3.2 S1-7: Characteristics of non-employees in the undertaking's own workforce

TABLE 23: NUMBER OF NON-EMPLOYEE HEADCOUNT IN OWN WORKFORCE IN 2024.

Number of non-employees in own workforce	8
Self-employed people	2
People primarily engaged in employment activities	6

LCL compiles data regarding non-employees at the end of every month, which is stored and calculated in a monthly FTE report. The number of non-employees is reported in headcount at the end of the reporting period.

4.3.3 S1-9: Diversity metrics

TABLE 24: NUMBER OF EMPLOYEE HEADCOUNT BY GENDER REPRESENTATION IN TOP MANAGEMENT.

Gender	Gender number top management*	Gender percentage top management
Male	5	83.30%
Female	1	16.70%
Other	0	0
Not reported	0	0
Total employees	6	100%

*The top Management are members of the Management Team.

TABLE 25: NUMBER OF EMPLOYEE HEADCOUNT BY AGE GROUP.

Age group	Distribution of employees by age group
Under 30 years old	11
30-50 years old	25
Over 50 years old	13

4.3.4 S1-13: Training and skills development metrics

TABLE 26: PERCENTAGE OF EMPLOYEES THAT PARTICIPATED IN REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS AND THE AVERAGE NUMBER OF TRAINING HOURS PER EMPLOYEE.

Gender	Percentage of employees	Average number of training hours per employee
Male	73%	69.48
Female	27%	67.15
Other	0	0
Not reported	0	0
Total employees	100%	68.85

4.3.5 S1-14: Health and safety metrics

TABLE 27: HEALTH AND SAFETY RELATED METRICS FOR EMPLOYEES AND NON-EMPLOYEES.

Metric	Employees
Employees covered by health and safety management system	100%
Number of fatalities as a result of work-related injuries and work-related ill health	0
Number of fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites	0
Number of recordable work-related accidents	1
Rate of recordable work-related accidents	2.18

5 ESRS S2: Workers in the value chain

5.1 SBM-3: MATERIAL IROS AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

The scope of our disclosure under ESRS 2 includes all value chain workers who may be materially impacted by LCL. This includes all workers likely to be materially affected through our operations, value chain, products, services, and business relationships. Beyond our own operations, LCL's Supplier Code of Conduct applies to all suppliers of goods and services, as well as their employees, agents, and contractors, irrespective of their geographical location or employment modality. Suppliers are also required to ensure their next-tier suppliers acknowledge and implement the Supplier Code of Conduct in their operations and supply chains. The types of value chain workers subject to material impacts include those in LCL's upstream and downstream value chain and may be classified into different categories based on their employment context. They may include workers who operate on LCL sites but are not part of our direct workforce, workers employed by entities in LCL's upstream and downstream value chains, workers involved in joint ventures or special purpo-

se vehicles associated with LCL, and those who are particularly vulnerable to negative impacts. This last category may include trade unionists, migrant workers, home workers, women, and young workers who may be disproportionately affected due to their inherent characteristics or contextual vulnerabilities.

LCL operates within a limited and highly regulated supply chain, primarily engaging with Belgian suppliers and customers, along with one major US omer. The geographical scope of LCL's value chain is predominantly focused on Belgium and the United States, both of which have stringent labour regulations. As a result, the risk of child labour or forced labour within LCL's value chain is considered low. Additionally, LCL's direct procurement of IT materials for our operations is minimal, as suppliers and customers are responsible for purchasing their own IT materials. This further reduces LCL's exposure to potential labour-related risks in our value chain.

We acknowledge that the material negative impact related to the exposure of workers in the upstream value chain to dangerous and harsh working conditions is both widespread and systemic. This impact affects numerous workers in multiple locations across the globe and is deeply rooted in structural issues within global supply chains and economic systems that sustain hazardous working conditions. Additionally, this negative impact is tied to specific business relationships within LCL's supply chain and sourcing activities, where the sustained operational dynamics of businesses sourcing IT materials contribute to these adverse working conditions. LCL recognises the need for a comprehensive assessment and remediation efforts to address and mitigate these impacts. Furthermore, the transition to greener and climate-neutral operations exacerbates systemic challenges within these business relationships, particularly in the mining and manufacturing sectors of IT materials. No significant positive impact has been identified for LCL; therefore, we do not consider this aspect to be materially applicable. Similarly, we have not identified any material risks or opportunities arising from impacts and dependencies on value chain workers, rendering this aspect also inapplicable. However, under ESRS 2 IRO-1 of our DMA, we integrate an understanding of how workers with particular characteristics, those working in specific contexts, or those undertaking particular activities may be at greater risk of harm. This approach

enables us to identify and disclose any workers who are or could be negatively affected and the specific contexts in which these risks arise. Lastly, no material risks or opportunities related to specific groups of value chain workers have been identified for LCL, therefore this disclosure is also not applicable.

5.2 POLICIES, ACTIONS AND TARGETS

5.2.1 S2-1: Policies related to value chain workers incl. MDR-P

We have identified a material impact on value chain workers, specifically the negative impact related to the exposure of workers in upstream value chain to dangerous, harsh working conditions related to mining and other activities related to the production of IT materials. To address this, we have implemented a Supplier Code of Conduct, which serves as the primary policy for managing material impacts on value chain workers, as well as associated risks and opportunities. The key components of this policy include fostering ethical behaviour, upholding environmental sustainability, maintaining labour standards, and promoting social responsibility throughout the supply chain. The policy is designed to minimise negative impacts by avoiding, mitigating, and monitoring the risks faced by workers involved in mining and IT material production. The scope of this policy applies to all suppliers of goods and services to LCL, as well as their employees, agents, and contractors, regardless of their geographical location or employment modality. Additionally, suppliers are required to ensure that their next-tier suppliers acknowledge and implement the policy within their own operations and supply chains. Furthermore, the policy is grounded in internationally recognised standards and guidelines, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. It is also aligned with relevant regulatory frameworks such as the EU CSRD and the EU Taxonomy to ensure compliance with best practices in responsible supply chain management.

LCL's policy emphasises the importance of ethical business practices, human and labour rights, and environmental protection, setting clear expectations for suppliers to align with these commitments. The policy specifically addresses key areas such as human and labour rights, non-discrimination and harassment,

fair compensation and working hours, health and safety, and training. In setting this policy, we ensure that it considers the interests of key stakeholders, including workers in our supply chain, by promoting responsible sourcing and fair labour conditions. To make the policy accessible to potentially affected stakeholders, we require our suppliers to ensure that all employees and subcontractors working on LCL-related matters are familiar with and adhere to the LCL Supplier Code of Conduct. Additionally, suppliers are responsible for administering annual training sessions on the Code of Conduct to all relevant employees and approved subcontractors. This approach ensures that those most impacted by the policy are fully informed of its expectations and requirements, fostering compliance and accountability across LCL's supply chain.

There is a strong human rights policy commitment outlined in our Supplier Code of Conduct, which sets clear expectations for stakeholders in the value chain to comply with legal requirements, uphold ethical business practices, respect human and labour rights, and protect the environment. Our general approach to respecting human rights relevant to value chain workers is demonstrated through the Supplier Code of Conduct, which reinforces LCL's commitment to promoting labour rights, fair treatment, non-discrimination, and fair compensation. This ensures that all workers in the value chain are treated ethically and in accordance with international human rights standards. Additionally, LCL's approach to engaging with value chain workers is embedded within the Supplier Code of Conduct, which highlights the company's commitment to ensuring fair treatment, maintaining health and safety standards, and prohibiting forced or child labour. This approach reflects LCL's proactive engagement with value chain workers to promote their well-being and uphold ethical labour practices throughout its operations and supply chain.

LCL's Supplier Code of Conduct includes measures that allow workers to report any violations or concerns, ensuring that we provide and enable remedies for human rights impacts. This approach integrates grievance mechanisms that offer workers clear avenues to seek redress in cases of human rights violations. Additionally, the Supplier Code of Conduct explicitly addresses issues related to human trafficking, forced labour, compulsory labour, and child labour. The code prohibits the use of child labour,

prison or forced labour, and any form of human trafficking or physical punishment, reinforcing LCL's commitment to upholding labour rights and ethical business practices throughout our value chain.

LCL's Supplier Code of Conduct aligns with internationally recognised instruments relevant to value chain workers, including the United Nations (UN) Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. The code establishes specific requirements related to fair and ethical treatment, non-discrimination, fair compensation, and the prohibition of forced or child labour, demonstrating its alignment with these global standards. Additionally, LCL has not reported any cases of non-respect for these internationally recognised principles within our upstream or downstream value chain, reinforcing our commitment to upholding human rights and labour standards across its operations and business relationships.

5.2.2 S2-2: Processes for engaging with value chain workers about impacts

We integrate the perspectives of value chain workers into our decisions and activities through our Supplier Code of Conduct. The Code specifically aims to minimise negative impacts on upstream workers by considering their views and interests, particularly in mining and IT material production, ensuring they are not subjected to unsafe or harsh working conditions. Engagement with value chain workers or their legitimate representatives occurs indirectly through the Supplier Code of Conduct, which sets expectations for suppliers to uphold labour and human rights. While LCL does not engage directly, it influences supplier behaviour, ensuring they adhere to ethical standards. Engagement occurs when suppliers commit to compliance with the Code of Conduct, with the type of engagement involving self-monitoring and potential audits or inspections by LCL. This engagement is ongoing, as compliance must be maintained at all times. The Chief Finance Officer is the most senior role responsible for implementing and maintaining the Supplier Code of Conduct, ensuring supplier compliance, and integrating the results of engagement into LCL's broader approach to sustainability and ethical business practices.

LCL's Supplier Code of Conduct establishes expectations for suppliers to respect human and labour rights, demonstrating a commitment to considering the perspectives of workers in our value chain. However, LCL does not have Global Framework Agreements or agreements with global union federations related to the respect of human rights of workers in the value chain. The effectiveness of engagement with workers in the value chain is assessed through suppliers' self-monitoring and demonstration of compliance with the Supplier Code of Conduct. Suppliers and their employees are encouraged to report potential misconduct or violations of the Code of Conduct, and any reported breaches are thoroughly investigated, reinforcing LCL's commitment to addressing concerns raised by value chain workers. While we ensure ethical labour practices through our Supplier Code of Conduct, it does not specifically outline steps to gain insights into the perspectives of particularly vulnerable or marginalised worker groups, such as women workers, migrant workers, or workers with disabilities.

5.2.3 S2-3: Processes to remediate negative impacts and channels for value chain workers to raise concerns

We acknowledge the material negative impact on workers in our upstream value chain due to exposure to dangerous and harsh working conditions related to mining and the production of IT materials. To address this, we established our Supplier Code of Conduct (please refer to sections 7.3.5 ESRS G1 for more information). In 2025, we will implement an audit framework for our suppliers' facilities to confirm compliance with the Code of Conduct, along with a whistleblowing system to allow suppliers to report potential misconduct or violations, which will be actively monitored. Suppliers are encouraged to collaborate with their primary LCL contact to address concerns, with an option to escalate issues to the points of contact outlined in the LCL Code of Ethics available on our website. Additionally, value chain workers can raise concerns through the channel outlined in LCL's Code of Ethics, published on our website.

While the formal whistleblower policy is set for implementation in 2025, the current framework for addressing concerns is detailed in the LCL Code of Ethics. We will support the availability of reporting channels in the workplace of our value chain workers

by ensuring that the whistleblowing system is well-publicised, accessible on our website, and included in supplier training. We expect our suppliers to ensure that employees are aware of and can utilise these reporting mechanisms. We will establish a whistleblowing system to track, monitor, and address reports of potential misconduct, with a dedicated Whistleblower Policy in place to protect individuals who report violations. Compliance with the Supplier Code of Conduct will be further validated through audits or inspections of suppliers' facilities, with the Chief Finance Officer responsible for ensuring its implementation. We will disclose how value chain workers are informed about and trust the new whistleblower policy and reporting processes, implementing measures to evaluate awareness and confidence levels and addressing any gaps. The Whistleblower Policy will also include protections against retaliation for individuals who report misconduct in good faith. LCL prohibits retaliation and encourages suppliers to maintain confidentiality in reports, ensuring all necessary steps are taken to address, track, and monitor breaches of the Supplier Code of Conduct.

5.2.4 S2-4: Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions incl. MDR-A

This year, we are launched a campaign to engage Tier 1, 2, and 4 suppliers in signing the LCL Supplier Code of Conduct. This initiative is expected to enhance commitment to ethical and responsible business practices within the supply chain. By ensuring that the majority of suppliers sign the Code of Conduct, we aim to strengthen LCL's policy objectives related to ethical sourcing, supply chain transparency, and worker welfare. Planned future actions include ongoing engagement with suppliers to further promote awareness and compliance with our Supplier Code of Conduct. The expected outcomes of these efforts include improved adherence to ethical standards, increased accountability, and the establishment of a more responsible and sustainable supply chain.

The geographical scope of this action includes our operations and upstream value chain, with a particular focus on engaging suppliers in regions where workers are exposed to hazardous

conditions. 'Tier 4 suppliers' specifically refers to construction companies involved in LCL's supply chain. This engagement will consist of continuous efforts during 2025, with sustained engagement in the future to ensure long-term awareness and compliance with the Supplier Code of Conduct.

This activity aims to prevent potential material impacts. We are also committed to cooperating and providing remedies for any harm resulting from actual material impacts within the supply chain, aligning with our Supplier Code of Conduct and grievance mechanism. As of the reporting year 2024, we have made progress in initiating the campaign. Quantitative and qualitative progress of this action will be disclosed in future reporting periods. We also aim to track and report the signing rate of suppliers as part of our commitment to achieving a 90% signing rate by 2026.

We have allocated significant financial resources to the implementation of this action plan. We conducted a procurement scan with a third-party firm to analyse our supplier base and inform the development of a sustainable procurement policy, with an operational expenditure (OpEx) of EUR 40,000. Additionally, in 2024, we hired one full-time equivalent (FTE) resource to oversee the implementation and follow-up of the procurement policy, with an estimated annual impact of EUR 100,000. The current financial resources allocated to the action plan, including the OpEx of EUR 40,000 for the consultancy service and the estimated EUR 100,000 impact of hiring an FTE for procurement policy implementation, are aligned with the most relevant financial amounts presented in LCL's financial statements for the respective fiscal years.

To address negative impacts related to workers in the upstream value chain being exposed to dangerous and harsh working conditions, we have established a framework for ethical business practices and worker welfare. Through this framework, we aim to enhance adherence to ethical standards, increase accountability, and foster a more responsible and sustainable supply chain, ultimately mitigating the identified negative impact.

In addition to this, we actively develop and explore initiatives aimed at enhancing the well-being of value chain workers, including stakeholder dialogues, surveys, and direct feedback

mechanisms. These initiatives enable continuous engagement with workers across the value chain, while fostering long-term partnerships with socially responsible suppliers.

We track and assess the effectiveness of our actions and initiatives through supplier audits, ESG assessments, and regular engagement with key stakeholders. We collaborate with partners and suppliers to gather insights and enhance our approach to delivering positive impacts for value chain workers. We have established processes for identifying and responding to actual or potential material negative impacts on value chain workers, which involve impact assessments, stakeholder consultations, and a structured framework for determining appropriate actions in response. Examples of these processes include the reporting incidents system and the informal whistleblowing policy.

LCL's strategy for taking action in relation to specific material negative impacts on value chain workers is multi-faceted, incorporating internal policies related to purchasing and supply chain management, as well as capacity-building initiatives such as training programmes for suppliers' employees. We also engage in collaborative action with industry peers and other relevant stakeholders to address systemic challenges and drive positive change for value chain workers. To ensure the effectiveness of processes that provide or enable remedy in cases of material negative impacts, we maintain continuous monitoring, evaluation, and improvement efforts. This includes establishing and maintaining clear reporting channels, implementing mechanisms for remediation and support, and regularly assessing the implementation and outcomes of these processes to confirm their effectiveness in addressing negative impacts. However, LCL has no material risks or opportunities related to this matter, making further disclosures on mitigation actions and opportunities inapplicable.

We take proactive action to avoid causing or contributing to material negative impacts on value chain workers through our practices. This includes implementing responsible procurement processes, ethical sales practices, and responsible data use to

mitigate any potential negative impacts. In instances where tensions arise between the prevention or mitigation of material negative impacts and other business pressures, we follow a structured approach that prioritises the well-being of value chain workers. This approach may involve conducting impact assessments, seeking input from stakeholders, and making informed decisions that prioritise worker welfare while considering other business pressures. We are committed to transparency and accountability and will disclose any severe human rights issues or incidents that have been reported in our value chain. If applicable, we will provide detailed disclosures about these issues, outlining the actions taken to address them and any subsequent improvements made to prevent similar incidents in the future. However, we have determined that disclosure of resources allocated to the management of material impacts is not applicable.

5.2.5 S2-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities incl. MDR-T

The target of having 90% of Tier 1, 2, and 4 suppliers sign LCL's Supplier Code of Conduct by 2026 is linked to the identified IRO: 'negative impact related to the exposure of workers in the upstream value chain to dangerous, harsh working conditions related to mining and other activities related to the production of IT materials.' The target is assessed using a specific KPI that tracks contract coverage, ensuring that 90% of Tier 1, 2, and 4 suppliers are covered by an LCL contract and/or have signed the Supplier Code of Conduct. This target directly contributes to LCL's Supplier Code of Conduct, reinforcing ethical business practices and improving labour conditions within our supply chain. This target is measured in absolute terms. The geographical scope of the target includes LCL's activities and our upstream value chain, particularly focusing on regions and areas where mining and other activities related to the production of IT materials take place. It encompasses geographical boundaries where the exposure of workers to dangerous and harsh working conditions is identified as a negative impact.

The baseline value for the target is set at 14.29%, with the base year established as 2024. The period to which the target applies is 2026. No milestones or interim targets have been defined as they are not applicable in this context. No specific methodology was considered in defining the targets, as they were determined internally based on material IROs. This target is not related to environmental matters that are based on conclusive scientific evidence. Stakeholder views were considered during the DMA, which identified workers in the value chain as a material sustainability matter and formed the basis for setting these targets. There have been no changes in targets or corresponding metrics during the reporting year. We disclose LCL's performance against our disclosed targets, detailing how the target is monitored and reviewed, the metrics used for evaluation, and whether progress aligns with the initial plan. The disclosure also includes actions and significant changes in our performance towards achieving the target, demonstrating our commitment to transparency and accountability in monitoring, evaluating, and reporting on our progress.

We do not specifically address direct engagement with value chain workers in setting targets. Instead, we rely on our Supplier Code of Conduct to establish expectations for ethical and responsible business practices within our supply chain. In terms of tracking performance against targets, the Supplier Code of Conduct emphasises the expectation that suppliers are self-monitoring and allows for LCL to audit or inspect suppliers' facilities to confirm compliance. However, direct engagement with value chain workers in tracking performance is not specifically implemented. Similarly, we do not have direct engagement with value chain workers in identifying lessons or improvements as a result of LCL's performance.

6 ESRS S4: Consumers and end-users

We are deeply committed to ensuring the highest service for our direct customers and ultimately, for our customers’ end-users. This standard considers topics that are very relevant for our performance and impact as a company. Data security, reliable and available products and services, customer relationships, sustainable marketing, communications, and advocacy are all topics that cannot be overlooked by LCL’s sustainability strategy as these relate to the areas in which we have our greatest impact on society.

6.1 SBM-3: MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Through the DMA process, we identified four topics and 12 material IROs related to ESRS S4. All LCL customers and end-users likely to be impacted by our services, as well as those of our customers, are included in the scope of this standard. However, given that LCL operates a business-to-business (B2B) model, the types of direct stakeholder that are impacted are client organisations that rely on data center services to support their operations. The types and descriptions of impacts, risks and opportunities are applicable to all LCL’s customer segments and geographies, as described in the below table of related material IROs.

TABLE 28: LIST OF MATERIAL IMPACTS, RISKS AND OPPORTUNITIES FOR CONSUMERS AND END-USERS

Topic	Impact type	IRO description
Customer relationships	Positive impact	A positive impact of LCL on customer relationships in terms of trust and safety.
	Opportunity	Opportunities linked to LCL's ambition to ensure high customer satisfaction by addressing their needs and desires.
	Risk	Risk linked to focusing too much on acquiring new clients and neglecting the support/further development of older and trusted clients.
Reliable and available products and services	Opportunity	Opportunities linked to LCL's operational agility, reliability and proximity which is a building block of trust.
	Potential negative impact	Potential negative impact if LCL would fail to provide data stored by critical entities like social security funds, banks, and major corporations, potentially leading to severe loss of trust, reputational damage, legal implications for LCL, but also significant damage for their clients.
	Risk	Risks linked to services not meeting quality standards can lead to loss of business, profit, litigation, liabilities, and reputational damage as clients are very driven by operation continuity.
Data security	Risk	Risks related to various threats that could compromise the physical security and safety of the facility, infrastructure, personnel, and assets (e.g., floods, intruders).
	Risk	Risks related to various threats that could compromise cybersecurity, as data centers are a possible target for hackers or other illegal causes.
	Potential negative impact	Potential negative impact of a cyber-attack caused by security gaps of LCL's services, employees, or employees of clients.
Sustainable marketing, communication and advocacy	Opportunity	Opportunities linked to advocating for sustainable practices, promoting eco-friendly solutions, creating industry leadership, and reducing LCL's environmental impact.
	Opportunity	Opportunities linked to LCL's strong ESG/sustainability branding.
	Positive impact	Positive impact of LCL's active communication with clients, creating awareness and ESG related initiatives.

6.2 POLICIES, TARGETS, AND ACTIONS

Recognising the key areas of materiality, we have implemented a comprehensive set of policies, targets, and actions to effectively address and manage the relationships and impacts on our customers across services, geographies, or customer segments. We developed our policies, targets, and actions considering the views and needs of our direct customers through the processes described in S4-2 and S4-3.

6.2.1 S4-1: Policies related to consumers and end-users incl. MDR-P

We have a set of policies in place that support the different materiality topics:

- The **Anti-Bribery & Corruption (ABC)** policy describes our vision and commitment towards ensuring LCL is a trusted and reliable partner.
- The **LCL Code of Ethics** provides a holistic overview on our approach to ESG considerations for our employees, customers, and partners. It displays our commitment to behave in a responsible manner across topics and to be transparent in our way of communicating with our customers and broader society. Our Code of Ethics is publicly available and shared on our website: [lcl-code-of-ethics.pdf](#)
- The **Whistleblowing policy** describes our commitment to ensuring that all internal and external stakeholders can raise concerns through a safe mechanism.

More details on these policies can be found in ESRS S1 and ESRS G1.

In addition, ISO certifications such as ISO 27001, ISO 45001, ISO 9001, ISO 50001 (LCL Wallonia One only), PCI DSS, ISAE3000 and ISAE3402 reinforce the commitment and direction of our data centers to be compliant with regulations and aligned with customer expectations.

Together, our policies and certifications provide the solid foundation of our approach to ensuring our customer's human rights, such as freedom of speech, access to information, and access to a safe environment are accounted for. They also set the roadmap of action in case these rights are violated. LCL's MT and our CEO are designated as the responsible oversight parties when it comes to ensuring that these policies are adequately implemented and monitored. This responds to the relevance of this topic for LCL's overarching operations.

6.2.2 S4-2: Process for engaging with customers and end-users about impacts

We place significant emphasis on engaging with customers and end-users to inform our decisions. We actively seek feedback through direct interaction with customers and industry associations, who act as legitimate proxies for end-users. Among the engagement methodologies, we use structured satisfaction surveys, strategic conversations, and industry benchmarking. These insights help shape our sustainability strategy, drive operational improvements, and align our initiatives with the evolving needs of our clients.

Engagement occurs at various stages of the customer relationship, including initial consultations, service implementation, and ongoing collaboration. The type and frequency of engagement vary depending on specific initiatives, customer needs, and industry developments. By maintaining continuous dialogue, we ensure that stakeholder expectations inform decision-making and sustainability efforts. We assess the effectiveness of these methods through feedback mechanisms, performance evaluations, and monitoring of outcomes. In addition, we actively seek to collaborate on co-creative solutions and sustainable initiatives, resulting in agreements and outcomes that align with the perspectives and needs of its consumers and end-users.

The Chief Market Development Officer (CMDO) holds overall responsibility for ensuring customer engagement and integrating stakeholder insights into the company's strategic approach. The CMDO oversees the Marketing & Sustainability team as well as Customer Relations, ensuring that engagement initiatives - ranging from customer feedback mechanisms to sustainability-driven

interactions - are effectively implemented. On a daily operational level, the Service Delivery team maintains direct and continuous interactions with customers, ensuring their needs and expectations are met. This team plays a key role in gathering customer feedback and relaying valuable insights that inform our approach to managing actual and potential impacts.

Through the aforementioned engagement approach, we ensure a delivery of highly reliable, secure, and energy-efficient infrastructure that supports accessibility to digital services to the end-user and broader society.

6.2.3 S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

Our general approach to avoiding and remediating negative impacts on our customer centers around our customer intimacy strategy. Our goal is customer-centricity, with a tailored approach of adapting services and experiences to meet the evolving needs and desires of our customers. The effectiveness of the remedy provided is assessed by the degree to which the solutions align with customer needs and contribute to their sustainability goals. Customer feedback plays a critical role in shaping our service improvements, operational strategies, and sustainability commitments, which is why we closely track and monitor any issue raised as part of our ongoing business operation.

- Interactive Customer Portal (LCL Service Hub): We provide customers with a secure, interactive platform where they can monitor their services, submit requests, and track ongoing support cases in real time.
- Dedicated Service Delivery team: Customers have direct and personal contact with our team, ensuring a swift response to operational concerns.
- Structured complaints handling process: We have a formal process in place to address customer complaints effectively, ensuring that issues are escalated and resolved in a timely manner.
- Regular customer meetings & strategic reviews.
- Customer Satisfaction Surveys: Feedback is actively collected through structured surveys to continuously improve service quality.

These channels ensure open communication, transparency, and continuous service enhancement. We are confident that our customers are aware of and trust the structures and processes in place to raise their concerns and protect them from retaliation. These protections are further detailed in ESRS G1.

6.2.4 S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities incl. MDR-T

To ensure we thrive together with our customers and work in the areas of material relevance for LCL, we have developed and validated a list of targets. The targets are inherently standard to our business and are implemented at each data center. Each target is reviewed annually to gain an overview of the achievements, blockers, and potential need for changes. This year, we adapted our targets to ensure alignment with CSRD and with the material IROs identified by the DMA.

These targets were set and validated by LCL's MT. The views and feedback of customers through the channels described in S4-3 was embedded in the setting, tracking, and adaptation of these targets.

TABLE 29: LIST OF TARGETS FOR CONSUMERS AND END-USERS

Topic	Target	Absolute/Relative	Baseline year	Baseline value	Status 2024	Methodology and assumptions
Data protection	Maintain compliance with ISO 27001/NIS2, GDPR, DORA, and increase the closing of open audits actions to 80% every year.	Relative	2022	Compliance with all regulations and open audits of 80%	Compliance with all regulations and open audits of 80%	Methodologies aligned with the identified regulations and audit processes.
Customer relationships	Achieve a Customer Performance Index (CPI) of 81% every year.	Relative	2024 (updated target) but KPI exists since 2022	74%	78%	A customer performance indicator (CPI) is a metric used to track and measure the performance of customers based on customer survey.
Reliable and available services	Become the best-connected data center every year.	Relative	2023	5	3	Increase the number of telecom operators available in our data centers, allowing our clients to choose their operations with more available options.
	Ensuring Maximum Uptime of 99.9% every year.	Relative	2020	100%	100%	Uptime is the guaranteed amount of availability of a data center, measured annually.
Sustainable marketing, communication and advocacy	Develop an annual Sustainability Report every year	Absolute	2023	One sustainability report for FY22	One sustainability report for FY24	This target considers alignment with best-in-class regulations and frameworks. As such, this year's report is CSRD aligned.
	Launch 12 initiatives of the Data Center University per year.	Absolute	2023	Launch of the Data Center University; 15 initiatives	20 initiatives	The initiatives greatly vary and do not follow a specific methodology.

6.2.5 S4-4: Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions incl. MDR-A

We have developed roadmaps that helps us reach our goals each year. All our actions are applicable to all data centers of LCL and are implemented on a yearly basis.

To ensure data protection, maintain compliance with regulations, and increase the closing of open audit actions to 80% every year we:

- Review compliance updates for all standards and regulations and incorporate the additions into our reporting and internal processes.
- Take appropriate action on all open audit items on a case-by-case scenario.

To achieve a Customer Performance Index (CPI) of 81% every year, we will continue to:

- Send a customer survey every year to our customers.
- Develop a yearly action plan to further improve our CPI.
- Ensure the continuous collection and incorporation of customer feedback into our business, through the channels described in S4-3.

To become the best-connected data center every year, we:

- Hold biannual meetings with existing telecom customers to ensure ongoing engagement and collaboration.
- Maximise the use of LCL's services by telecom customers within our data centers.
- Host the annual Carrier Partner Event, bringing together telecom customers and prospects to foster industry connections and showcase LCL's capabilities.
- Formalise and communicate the presence of our business developers at national and international events, ensuring visibility and strategic networking.

To ensure maximum uptime every year, we:

- Facilitate continuous training of our staff on Standard Operating Procedures (SOPs) and Emergency Operating Procedures (EOPs).
- Develop risk analysis to identify and mitigate any potential uptime risk.
- Conduct ongoing maintenance of equipment according to the manufacturer's recommendations.
- Conduct preventive, corrective, and predictive maintenance (thermal imaging, vibration, etc.).
 - Develop a high-risk activity programme.
 - Ensure that the latest updates to the critical spare programme, winter readiness programme, and critical infrastructure programme take place.

To ensure transparent communication, we are developing two Sustainability Reports for FY2024: a CSRD-aligned Report and a complementary Activity Report. This two-fold initiative aims to provide transparent and comprehensive communication to our wide range of interested stakeholders.

Finally, to ensure an active and dynamic Data Center University, we will plan and undertake various activities throughout the year. We are developing partnerships with universities and high schools to deliver relevant training, launch social media channels to attract new users, and create structured, engaging content that is easy for visitors to consume. We have set a target of delivering at least 12 content actions per year.

As these actions are being implemented on a continuous yearly basis, the 2024 target status displayed in S4-5 is a direct reflection of the progress of these actions towards reaching our targets. Information on CapEx/OpEx investments to support these activities is considered impractical, given how these actions are embedded into LCL's overall business operations.

7 ESRS G1: Business conduct

7.1 IRO1: DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

The DMA identified strong ethical behaviour and sustainability performance as opportunities that result in customer trust, as well as other indirect benefits, like favourable financing conditions. The methodology and specific data points of the DMA are disclosed in the section dedicated to ESRS E1.

7.2 GOV-1: THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

LCL's administrative, management and supervisory bodies play a critical role in ensuring that the highest standards of business conduct, ethics, and integrity are maintained throughout our organisation, as evidenced by the development and approval of our Code of Ethics, Anti-Bribery & Corruption Policy, and Whistleblower Policy. These bodies oversee the annual review of the LCL Code of Ethics and related policies to ensure alignment with the organisational context, risk landscape, and applicable laws. They also actively communicate and promote our Code of Ethics and policies to our employees, suppliers, and partners, setting ethical standards and expectations for conduct within LCL and our extended value chain.

Our administrative, management and supervisory bodies showcase their expertise in business conduct matters by overseeing the integration of ESG principles and ethical decision-making frameworks into LCL's business. They also demonstrate this expertise through active involvement in the development, review, and promotion of our policies.

7.3 G1-1: BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE

LCL recognises that upholding the principles of strong ethical behaviour and a commitment to sustainability are essential for maintaining customer trust, securing long-term business rela-

onships, and accessing favourable financing conditions. We have established a robust framework of business conduct policies that promote integrity, transparency, and accountability across our operations, which includes our:

- **Code of Ethics**, which serves as a framework for ethical decision-making and outlines the standards of conduct we expect from our employees, customers, suppliers and partners. It reflects our commitment to integrity, transparency, and responsible business practices.
- **Anti-Bribery & Corruption Policy**, which safeguards against unethical business practices,
- **Whistleblower Policy**, which ensures a safe and confidential mechanism for reporting misconduct, and
- **Supplier Code of Conduct**, which sets clear ethical and sustainability expectations for our business partners.

We reinforce LCL's commitment to responsible business practices and long-term value creation by embedding these codes and policies into our corporate culture. More detailed information can be found below.

Code of Ethics

LCL's Code of Ethics summarises our key policies and procedures, such as HR policies, procurement policies, and ISO policies, in alignment with CSRD principles. It applies not only to our employees and the Board, but also to external stakeholders such as customers, suppliers, and partners, ensuring that our entire value chain is informed by and committed to our core values. The LCL Code of Ethics is publicly available on our website.

Anti-Bribery & Corruption Policy

LCL's Anti-Bribery & Corruption Policy defines bribery and corruption, provides clear guidance on identifying and reporting such activities, and establishes preventative measures to mitigate risks. The policy outlines the consequences of non-compliance and reinforces the importance of ethical decision-making within LCL. It applies to all our personnel, including directors, employees, and third parties working for - or on behalf of - LCL, regardless of their employment status, and covers all locations within Belgium.

LCL Management, under the direction of the Quality Manager, holds the highest accountability for policy implementation. We are aligned with leading international standards, committing to regulations such as the United Nations Convention against Corruption, the US Foreign Corrupt Practices Act, and the UK Bribery Act. Recognising the growing importance of business ethics, this policy considers environmental, social, and governance-related standards, emphasising that ethical misconduct can negatively impact our reputation and expose LCL to regulatory scrutiny. We have integrated this policy into LCL's terms of employment and compliance framework to ensure accessibility and awareness. LCL Management is committed to continuously improving anti-corruption measures, including mandatory annual awareness sessions for personnel and communication of any policy amendments.

Whistleblower Policy

LCL's Whistleblower Policy encourages employees and third parties to report any alleged violations of our Code of Conduct or breaches of European and Belgian law without fear of retaliation. The policy outlines a clear reporting procedure and provides protection to whistleblowers, ensuring a safe and transparent reporting environment. It applies to all employees, applicants, consultants, stakeholders, partners, and visitors at all LCL locations within Belgium. LCL Management, under the direction of the Chief Human Resources Officer, holds the highest accountability for implementing the policy. This policy is aligned with key third-party standards, including European and Belgian law, LCL's Code of Ethics, Anti-Bribery & Corruption Policy, and Supplier Code of Conduct, reinforcing our commitment to ethical business practices. To uphold openness and integrity, the policy actively encourages whistleblowing as a means of strengthening transparency and mitigating unethical practices. It is available to all employees, and we provide training on reporting channels to ensure awareness and accessibility. The policy and any amendments are also communicated to all employees annually to maintain its relevance and effectiveness.

We provide a whistleblowing system on the LCL website for reporting potential misconduct or violations of the LCL Code of Ethics. This system is communicated and made available to

all suppliers and LCL's employees. Reports can be made on an anonymous basis. We also encourage our employees and suppliers to report any conduct that is an actual or potential violation of the LCL Code of Ethics. We have designated the Chief Human Resources Officer as LCL's final points of contact for reporting concerns. We also provide our workers with information and training about the whistleblowing system.

Anti-retaliation and whistleblower protection

LCL does not tolerate any retaliation taken against any individual who has, in good faith, sought advice or reported any potential misconduct or a possible violation of the LCL Code of Ethics including the Anti-Bribery & Corruption Policy and the Supplier Code of Conduct. Whistleblowers are protected by LCL's Whistleblower Protection Policy. Reports made through the whistleblowing system may be made on an anonymous basis. If misconduct is confirmed, appropriate disciplinary actions will be taken, and measures will be implemented to protect whistleblowers in accordance with applicable laws.

Supplier Code of Conduct

LCL's Supplier Code of Conduct promotes ethical behaviour, environmental sustainability, labour standards, and social responsibility throughout our supply chain. It sets clear expectations for all stakeholders to comply with ethical business practices, respect human and labour rights, and minimise environmental impact. The policy applies to all suppliers of goods and services to LCL, including their employees, agents, and contractors, regardless of geography or employment modality. We also require that our suppliers ensure that their next-tier suppliers acknowledge and implement the LCL Supplier Code of Conduct. The Chief Finance Officer and Procurement Specialist hold ultimate responsibility for maintaining and enforcing the policy. Our Supplier Code of Conduct is aligned with internationally recognised standards - such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises - while also complying with EU regulations such as the CSRD and EU Taxonomy. The policy is designed to minimise negative impacts on workers in the upstream value chain, particularly those invol-

ved in mining and IT material production, ensuring they are not subjected to unsafe or exploitative conditions. For accessibility, the Supplier Code of Conduct is shared with all Tier 1 and Tier 2 suppliers. Any potential misconduct or violations can be reported through LCL's whistleblowing system, which is available on our website.

The LCL Code of Ethics, the Anti-Bribery & Corruption Policy, the Whistleblower Policy, and the Supplier Code of Conduct outline the mechanisms for identifying, reporting, and investigating concerns about behaviour which is unlawful or in contradiction of our Code of Conduct. They set forth the standards and requirements for LCL and our personnel to prevent and combat any form of misbehaviour. These policies also ensure that both internal and external stakeholders have the means to report concerns. Compliance is mandatory for all our employees and Management is committed to continuously enhancing LCL's good business conduct efforts. All LCL personnel are responsible for reporting concerns and our policies emphasise that suspicion does not require evidence. We also encourage a culture in which questions and concerns can be raised without fear of retaliation, and anyone who raises a genuine concern in good faith is supported. Our codes and policies are subject to annual review, with interim changes as necessary to ensure alignment with LCL's organisational context and applicable laws and regulations.

Corporate culture

We have established a corporate culture committed to conducting business with the highest level of ethical standards. This commitment is reflected in the development and promotion of policies such as the Supplier Code of Conduct, Anti-Bribery & Corruption Policy, and Whistleblower Policy, which are part of LCL's Code of Ethics. We promote our corporate culture through regular communication with stakeholders, including suppliers, and making our Code of Ethics publicly available on our website. The annual review and potential update of our Code of Ethics and related policies also demonstrate our commitment to evaluating and adapting LCL's corporate culture based on evolving standards and best practices.

Training

We have a comprehensive policy in place for training our employees on business conduct, which includes coverage of the Anti-Bribery & Corruption Policy and the Whistleblower Policy. Our training aims to enhance awareness, understanding, and compliance with the policy's provisions. The target audience for the training sessions includes employees at all levels and departments across the organisation. The training sessions are conducted annually and involve a significant depth of coverage to ensure thorough understanding and adherence to the different policies. The e-learning tool within the Data Center University framework serves as the platform for training delivery. The transition to e-learning offers flexibility for employees to access and complete the training at their convenience. Every employee is also mandated to re-take the test annually, reinforcing the commitment to regular and up-to-date training on business conduct matters. The e-learning tool covers various aspects of the policies.

The functions within LCL that are most at risk of corruption and bribery include: Operations, Finance, Sales, and Marketing. These functions are highlighted as 'most at risk' based on their potential exposure to external parties, government interactions, international operations, financial transactions and sales and marketing activities, which may present opportunities for unethical conduct related to bribery and corruption.

LCL has established procedures to investigate business conduct incidents, including incidents of corruption and bribery, in a prompt, independent, and objective manner. The implementation of the Gifts and Entertainment Register is an example of this. All gifts are recorded and handed in, and an annual raffle is organised.

7.4 G1-2: MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

Following our Supplier Code of Conduct, our policy of preventing late payments emphasises LCL's commitment to paying our suppliers in a fair and timely manner. The policy includes clear guidelines and measures to ensure that payments to SMEs are processed and disbursed within agreed terms. This commitment reflects our recognition of the importance of SMEs within LCL's supply chain and our adherence to fair and ethical business practices.

Our approach to our suppliers fosters open communication and engagement, acknowledges and mitigates supply chain risks and places significant emphasis on sustainability. We maintain transparent and collaborative relationships with our suppliers to identify and address risks as early as possible - including those related to social, environmental, and ethical considerations - and improve sustainability performance across our supply chain.

We incorporate social and environmental criteria into our supplier selection process using a ESG score, underlining our commitment to responsible sourcing and sustainability. Our Supplier Code of Conduct outlines our expectation that suppliers adhere to social and environmental standards, including labour practices, environmental impact, and ethical conduct. We select our suppliers according to their alignment with these criteria, demonstrating our dedication to engaging with suppliers that prioritise social and environmental responsibility. LCL's existing suppliers are included in our sustainability journey and are encouraged to use an ESG score to maximise their commitment to sustainability and responsible sourcing.

8 Appendix

8.1 ANNEX 1: LONG LIST OF EU TAXONOMY ELIGIBLE ACTIVITIES FOR LCL

ANNEX 1: LONG LIST OF EU TAXONOMY ELIGIBLE ACTIVITIES FOR LCL

Activity Number	Activity	Description	Link with LCL	Relevant KPI
CCM/CCA 4.1	Electricity generation using solar photovoltaic technology	Construction or operation of electricity generation facilities that produce electricity using solar photovoltaic (PV) technology.	LCL Wallonia operates solar photovoltaic technology	CapEx
CCM/CCA 4.3	Electricity generation from wind power	Construction or operation of electricity generation facilities that produce electricity from wind power.	LCL constructed Wind power facilities.	CapEx and OpEx
CCM/CCA 6.5	Transport by motorbikes, passenger cars and light commercial vehicles	Purchase, financing, renting, leasing and operation of vehicles designated as category M1, N1 or L (2- and 3-wheel vehicles and quadricycles).	EV cars and operational lease	OpEx
CCM/CCA/CE 7.1	Construction of new buildings	The development of construction projects for residential and non-residential buildings by combining financial, technical, and physical means with a view to sell the building upon delivery or at a later date, as well as the construction of complete residential or non-residential buildings, on own account for sale or on a fee or contract basis.	Expansion projects: BW4 and Christo	CapEx
CCM/CCA/CE 7.2	Renovation of existing buildings	Construction and civil engineering works or preparation thereof.	Renovation of data center owned by LCL. Renovations are made based on client specifications.	CapEx
CCM/CCA 7.3	Installation, maintenance and repair of energy efficiency equipment	Individual renovation measures consisting in installation, maintenance or repair of energy efficiency equipment.	Cooling Systems – Only related to energy efficient HVAC systems.	CapEx
CCM/CCA 7.4	Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings.	Charging stations for EV	CapEx
CCM/CCA 7.5	Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	Smart Meters	CapEx
CCM/CCA 7.6	Installation, maintenance, and repair of renewable energy technologies	Installation, maintenance and repair of renewable energy technologies, on-site.	Solar panels and wind turbines	CapEx
CCM/CCA 7.7	Acquisition and ownership of buildings	Buying real estate and exercising ownership of that real estate	LCL owns land and buildings.	CapEx and OpEx
CCM/CCA 8.1	Data processing, hosting, and related activities	Storage, manipulation, management, movement, control, display, switching, interchange, transmission or processing of data through data centers, including edge computing.	Five data centers across Belgium	Turnover and OpEx

8.2 ANNEX 2: ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES (GOV-1)

Board of Directors

Name	Role	Relevant experience
Els Demeester	Chairwoman	With over three decades of international experience at the C-level in the technology industry, Els Demeester boasts an impressive track record as a strategic changemaker. Her passion and expertise span a wide range of topics, from complex stakeholder management to business transformation and customer experience.
Ingrid Daerden	Board member	Innovative and sustainable real estate are a well-known playing field for Ingrid Daerden. The knowledge she gained as a real estate expert at ING Belgium and deepened as Head of Treasury & Project Finance at Cofinimmo has led to her current position as CFO at Aedifica.
André Autrand	Board member	As CEO of I4B (The Belgian Infrastructure Fund), André Autrand understands that investments are key levers for building a sustainable and resilient economy. Autrand is committed to all aspects of ESG. He also keeps a close eye on financial matters.
Danielle Devogelaer	Board member	Danielle Devogelaer brings 20 years of experience in analysing the Belgian and European energy landscape to the table, with a particular expertise in electricity. She excels in topics such as energy infrastructure, market design, and industrial transition. As a member of several energy commissions, she contributed to reports on the Belgian long-term energy future and ideal energy mix.
Laurens van Reijen	Board member	LCL's Chief Executive Officer and founder, Laurens van Reijen, has built LCL into a reference point for the data center industry in Belgium over two decades. To make LCL and the entire sector as energy efficient as possible, and to build a healthy business with maximum positive impact on the environment, he also holds international positions in various sustainability initiatives.

Management Team Composition

Name	Role
Laurens van Reijen	Chief Executive Officer
Abdellah Mahlous	Chief Operations Officer
Steve De Craene	Chief Finance Officer
Nicolas Coppee	Chief Information Officer
Floris Smits	Chief Project Officer
Baudouin Corlù	Chief Market Development Officer
Fabienne Frisson	Chief Human Resources Officer

Middle management Composition

Name	Role
Joris Robbeets	Service Delivery Manager
Sam Berckmans	IT Systems Manager
Mieke Germonprez	Quality Manager
Valérie Van Roy	Marketing & Communication and Sustainability Manager
Joke Bruyninckx	Critical Infrastructure Manager

Sustainability Workgroup Composition

Name	Role
Valérie Van Roy	Marketing & Communication and Sustainability Manager
Théo Grijspeerd	Sustainability Coordinator
Baudouin Corlù	Chief Market Development Officer
Mieke Germonprez	Quality Manager
Fabienne Frisson	Chief Human Resources Officer
Adeline Wantiez	Project Manager
Joke Bruyninckx	Critical Infrastructure Manager
Abdellah Mahlous	Chief Operations Officer
Steve De Craene	Chief Finance Officer
Nicolas Coppee	Chief Information Officer

8.3 LIMITED ASSURANCE REPORT OF THE STATUTORY AUDITOR ON THE DOUBLE MATERIALITY ASSESSMENT



LCL NV
Limited assurance report of the statutory auditor on LCL NV’s double materiality assessment published in the “Sustainability Statement 2024” for the year ended 31 December 2024

LCL NV | 31 December 2024

Limited assurance report of the statutory auditor on LCL NV’s double materiality assessment published in the “Sustainability Statement 2024” for the year ended 31 December 2024

To the board of directors

We have been engaged to perform a limited assurance engagement aimed at expressing a limited assurance conclusion on the double materiality assessment (“Selected Information”) of LCL NV (“LCL” or the “company” or the “group”), published in *chapters 1.3 Strategy and 1.4 Impact, risk and opportunity management* of the “Sustainability Statement 2024” (the “report”). In preparing the Selected Information, the Company applied the principles of the European Sustainability Reporting Standards ESRS 1 (General Requirement 3 “Double materiality as the basis for sustainability disclosures”) and ESRS 2 (disclosure requirements SBM-1, SBM-2 & IRO-1) (“Applicable Criteria”).

Limited assurance conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the company’s double materiality assessment, as included in *chapters 1.3 Strategy and 1.4 Impact, risk and opportunity management* of the “Sustainability Statement 2024”, in all material respects, has not been prepared in accordance with the Applicable Criteria.

Basis for conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance engagements other than audits or reviews of historical financial information (“ISAE 3000 (Revised)”), as applicable in Belgium.

Our responsibilities under this standard are described in more detail in the section of our report “Responsibilities of the statutory auditor relating to the limited assurance engagement on the double materiality assessment”.

We have complied with all ethical requirements relevant to limited assurance engagement on the double materiality assessment in Belgium, including those regarding independence.

We apply the International Standard on Quality Management 1 (ISQM 1), which requires us to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have obtained from the board of directors and the company’s officials all explanations and information required for our limited assurance engagement.

We believe that the evidence we have obtained in the framework of our limited assurance engagement is sufficient and appropriate to provide a basis for our conclusion.

Other matter

The scope of our work is limited to our limited assurance engagement on the double materiality assessment as included in *chapters 1.3 Strategy and 1.4 Impact, risk and opportunity management* of the “Sustainability Statement 2024”. Our limited assurance engagement does not extend to any other information included in the report.

LCL NV | 31 December 2024

Responsibilities of the board of directors relating to the preparation of the double materiality assessment

The board of directors is responsible for the preparation of the Selected Information and the references made to it presented in the “Sustainability Statement 2024” as well as for the declaration that its double materiality assessment meets the requirements of the Applicable Criteria.

This responsibility includes:

- understanding the context in which the group’s activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the group’s financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions and estimates that are reasonable in the circumstances.

The board of directors is also responsible for the preparation of the “Sustainability Statement 2024”, which includes the double materiality assessment disclosures as required by the applicable criteria.

This responsibility comprises:

- designing, implementing and maintaining such internal control that the board of directors deems necessary for the preparation of the double materiality assessment that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

The board of directors are responsible for overseeing the group’s double materiality assessment process.

Responsibilities of the statutory auditor relating to the limited assurance engagement on the double materiality assessment

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the double materiality assessment is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken based on the double materiality assessment.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), as applicable in Belgium, we apply professional judgement and maintain professional scepticism throughout the engagement. The work performed in an engagement aiming to obtain a limited level of assurance, for which we refer to the section “Summary of the work performed”, is less in scope than in an engagement aiming to obtain a reasonable level of assurance. Therefore, we do not express an opinion with a reasonable level of assurance as part of this engagement.

Since the forward-looking information in the double materiality assessment and the assumptions on which it is based, relate to the future, they may be affected by events that may occur in the future and/or by potential actions of the group. The actual outcomes are likely to be different from the assumptions made, as the anticipated events often do not occur as expected, and the deviation from them could be material. Therefore, our conclusion does not provide any assurance that the reported actual outcomes will correspond with those included in the forward-looking information of the double materiality assessment.

Our responsibilities in respect of the double materiality assessment in relation to the process, include:

- obtaining an understanding of the process, but not for the purpose of providing a conclusion on the effectiveness of the process, including the outcome of the process; and
- designing and performing procedures to evaluate whether the process is consistent with the group's description of its process, as disclosed in *chapters 1.3 Strategy and 1.4 Impact, risk and opportunity management in the "Sustainability Statement 2024"*.

Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the double materiality assessment. The procedures in a limited assurance engagement vary in nature and timing and are less in extent than procedures performed 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 a reasonable assurance engagement been performed.

The nature, timing and extent of the procedures selected depend on professional judgement, including the identification of areas where material misstatements are likely to arise in the double materiality assessment, whether due to fraud or error.

In conducting our limited assurance engagement, with respect to the double materiality assessment process, we:

- obtained an understanding of the process by:
 - performing inquiries to understand the sources of the information used by management (e.g., stakeholder engagement, business plans and strategy documents); and
 - reviewing the company's internal documentation of its process; and
 - assessing the company's compliance with the relevant ESRS disclosure requirements related to the preparation and disclosure of the double materiality assessment.
- evaluated whether the assurance evidence obtained from our procedures with respect to the double materiality assessment process implemented by the company was consistent with the description of the process set out in chapters *1.3 Strategy and 1.4 Impact, risk and opportunity management in the "Sustainability Statement 2024"*.

Statement related to independence

Our audit firm and our network have not performed any engagements which are incompatible with the limited assurance engagement, and our audit firm has remained independent of the group throughout the course of our mandate.

Use of our report

This report is made solely to the company's directors, as a body, in accordance with ISAE 3000 (Revised). Our work has been undertaken so that we might state to the company those matters we are required to state to them in this report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the company and the company's directors as a body for our work, or for the conclusions we have formed.

Signed at Zaventem.

The statutory auditor

Deloitte Bedrijfsrevisoren/Réviseurs d'Entreprises BV/SRL

Represented by Nico Houthaeye

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