



DATA4 GROUP  
**CSR report**



2024



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## Our commitment



Olivier Micheli

Chairman & CEO of Data4



François Stérin

COO of Data4

**“We are at a crossroads between technological performance and sustainability”**

The year 2024 marks a major turning point, not only for Data4, but also for the European and worldwide data center industry as a whole. At a time when the digital transformation is moving up a gear, driven by the meteoric rise of artificial intelligence and new digital uses, our infrastructures are a pivotal element in the strategic challenges of connectivity, storage and computing. However, this digital revolution comes with another equally fundamental requirement -

responding to environmental, social and governance (ESG) concerns. At Data4, our responsibility goes beyond simply supplying high-performance secure infrastructures. We are the architects of a unique balance between technological innovation and sustainability. This 2024 ESG report illustrates our determination to reconcile these two dimensions to build the future in a responsible manner.

### CARBON NEUTRALITY: A FUNDAMENTAL AMBITION

At the end of 2024, we reached a new milestone, with a 9% reduction in our Power Usage Effectiveness (PUE) in three years while maintaining our Water Usage Effectiveness (WUE) well below the average for the industry. We also further cemented our commitment in favour of Power Purchase Agreements (PPA), long-term renewable energy contracts which guarantee a supply of renewable electricity and contribute to network stability.

Furthermore, we are fully aware of the environmental impact of the construction of our data centers. For this reason, we include the criteria of the BREEAM framework in the design of our infrastructures to minimise our carbon footprint over the entire life cycle of our buildings, particularly on Scope 3 linked to materials and the building process.

### A PRESENCE ROOTED IN THE TERRITORIES

Data4 strives to transform its campuses into catalysts boosting the local economy. Our initiatives go beyond the economic sphere, with reuse of waste heat to supply local infrastructures, educational partnerships to train the talent of the future and collaborations with

local authorities to seamlessly integrate our projects into the community. This strategy bears witness to our determination to combine global impact and local contribution.

## HUMAN BEINGS, THE DRIVING FORCE BEHIND OUR SUCCESS

Diversity, inclusion and the well-being of our teams are absolute priorities for us. In 2024, we continued our efforts in terms of internal mobility with a dozen promotions, thereby making the most of the talent in our organisation. We take pride in guaranteeing

the health and safety of our employees and partners. Through our Data4Safe program, we have succeeded in maintaining a zero serious accident record, illustrating our steadfast commitment to prevention and safe working conditions.

## TRANSPARENCY AND GOVERNANCE: ETHICS BUILDING TRUST

Our governance commitments are based on firm principles of transparency and ethics. In 2024, we strengthened our compliance framework to satisfy the European regulations, set up an ambitious responsible purchasing policy, introduced a business code of

conduct and established an internal whistle-blowing system. These approaches embody our vision of building a resilient, innovative model which respects future generations.

## BUILDING A SUSTAINABLE FUTURE: AT THE CROSS-ROADS OF THE DIGITAL AND ENERGY TRANSITION

The rise in artificial intelligence and the energy transition are profoundly redefining the role of data centers. On the one hand, the digital transformation requires infrastructures which are ever more powerful and resilient. On the other hand, the climate crisis demands a significant reduction in the carbon footprint and optimised resource management.

At Data4, we are taking up this challenge by designing infrastructure which is both efficient and responsible. We are innovating to improve our energy efficiency,

limit our environmental impact and support the growth of digital technology while at the same time reducing our consumption of resources.

We are convinced that these two transformations are not mutually contradictory but rather complement one another. Our ambition: **bring together technological performance and environmental responsibility to build a sustainable future.**

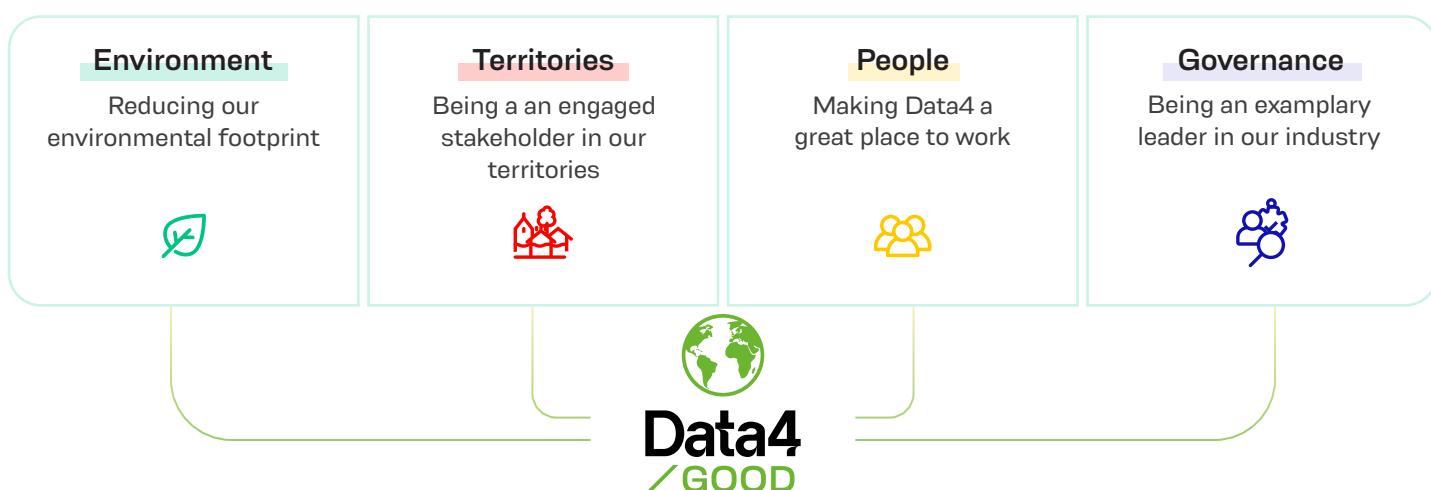




## Building a sustainable company

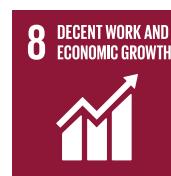
Our Data4Good program dedicated to sustainable development is one of Data4's three strategic priorities, along with quality to constantly meet our customers' expectations, and adaptability to support our customers' development.

This ambitious, long-term program is being implemented across all the Group's European entities and is based on **four pillars**:



## Our commitments

Given our business sector and the four pillars on which our dedicated sustainability program is based, we work on a daily basis to comply with the 10 Sustainable Development Goals (SDGs) of the United Nations Global Compact.



Our approach to sustainable development is comprehensive, covering the following four areas:

## Environment

- Define a new trajectory validated by the SBTi
- Reduce our GHG emissions during the construction and operating phases of our data centers
- Improve our energy efficiency
- Reduce our water consumption
- Reduce the proportion of waste sent to landfill
- Roll out a program in favour of biodiversity
- Create a carbon fund for the study of innovative solutions
- Contribute to global carbon neutrality by sequestering the equivalent of part of our residual GHG emissions.



## People

- Roll out our "Data4Safe" program dedicated to H&S in all our entities for all our employees and stakeholders
- Improve our employees' working conditions and training
- Attract and recruit talented employees to support the strong growth of Data4.



## Territories

- Improve the acceptability of our data centers in the territories
- Encourage training, education and employability
- Raise awareness among institutional stakeholders
- Innovate for the environment and local communities
- Advertise our strategy more effectively in the territories.



## Governance

- Prepare Data4 to satisfy the requirements of future regulatory obligations: CSRD, taxonomy, EED.
- Industrialise our data production processes to increase their efficiency
- 100% of employees trained in the ethics policy
- Continue the deployment of our responsible purchasing policy.



Information about the application of the Data4Good program and results are shared and monitored regularly at our monthly executive committee and board of directors meetings. This program involves all Data4 employees,

service providers and customers, as well as stakeholders in our ecosystem such as municipalities and universities.

**Data4 supports the United Nations Global Compact** and is involved in other initiatives such as:

#### The Science Based Target

**Initiative (SBTI)** to limit global warming to 1.5°C by 2050



#### The coalition for sustainable IA



#### The Climate Neutral Data

**Center Pact** to reduce the environmental footprint of data centers



The “**Net Zero Innovation Hub For Data Centers**” to speed up the industry’s race towards net zero



## Regulatory compliance and certifications

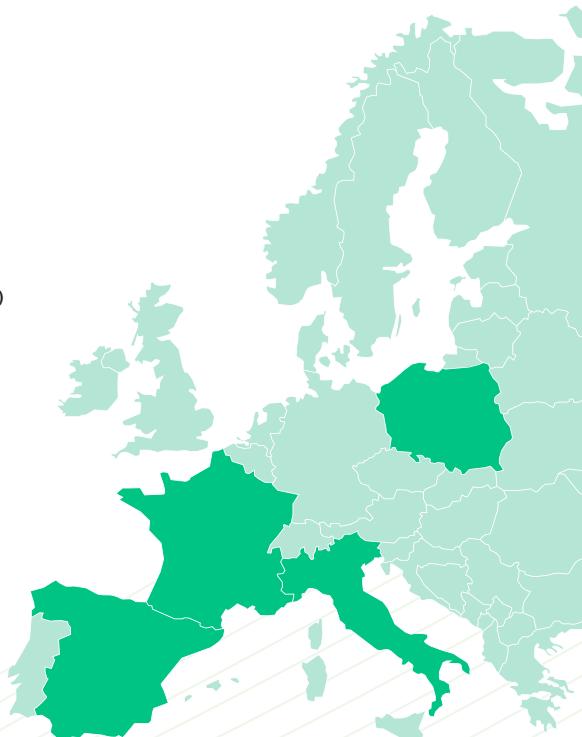
Data4 carries out regulatory intelligence with the help of specialist firms to comply with all applicable regulations in the countries where it operates. Data4

also has numerous certifications to help us progress in various areas, particularly for sustainable development. Certifications are also a sign of our progress.

	<b>ISO 9001 v2015</b> Quality Management
	<b>ISO 14001 v2015</b> Environmental Management
	<b>ISO 50001 v2018</b> Energy Management
	<b>ISO 45001 v2018</b> Health and Safety Management
	<b>HDS v2018</b> Health data hosting approval
	<b>ISO 27001 v2022</b> Information System Security

	<b>ISO 22337:2018 Part 1-7</b> As built validation - level: availability class 4 – protection security class 4
	<b>ANSI TIA 942 A2014 (Rating 4)</b> Design criteria for respective Rating/ Tier level
	<b>PCI DSS:2018 v3.2.1</b> Payment card industry data security
	<b>ISAE 3402 type II</b> Suitability of the design & operating effectiveness of controls
	<b>GREENCIRCLE CERTIFIED</b> Waste diverted from Landfill

	<b>LEED v2009</b> Core and Shell development Gold
	<b>EUROPEAN CODE OF CONDUCT FOR DATA CENTER</b> Economic and energy supply security impacts
	<b>ECOVADIS (PLATINUM MEDAL)</b> The EcoVadis Rating covers a broad range of non-financial management systems including Environmental, Labor & Human Rights, Ethics and Sustainable Procurement impacts.
	<b>BREEAM</b> Code for a sustainable built environment





## Reducing our environmental footprint

Data4 is fully and actively involved in **reducing its environmental impact**. Data4Environment covers seven strong actions taken by the company, with **ambitious targets for 2030**.

We aim to lead the way, involving all our customers and partners, because it will take a combined effort to solve the digital/environment challenge.

## Highlights of 2024

### → **A reduction of our PUE by 9% in three years**

The company **reduced its operational PUE by 9% between 2021 and 2024** through a number of actions, such as:

- Better monitoring of our electricity consumption in real time
- The controlled temperature rise in computer rooms,
- Continuation and optimisation of free chilling technologies using fresh outside air wherever possible.

### → **An ambitious strategy for low-carbon concrete**

#### construction

### Data4 innovations for “low carbon data centers”

Based on several years of R&D, Data4 has implemented **sustainable initiatives** for the design of its data centers in 2023

**#01** Since 2022, Data4 delivered the first data center with **low carbon foundations**

**#02** Data4 continues to roll out **low-carbon hollow slabs**

The implementation of **all the Ecodesign guidelines**, including low carbon concrete solutions, have already led to a reduction of **13% in the carbon footprint of each new MW IT build.**

2024 2030

0 -13% -38%

At Data4, reducing the carbon footprint in the construction of data centers is a strategic priority. In 2023, Data4 adopted the use of **low-carbon precast slabs**, an innovation resulting from three years of research and development. Thanks to their honeycomb design and optimised production, these slabs **reduce the amount of concrete required by 50%**, thus enabling

**a global reduction of 13% in the carbon footprint** linked to the construction of our infrastructures. This solution, deployed in France and Italy, illustrates our commitment to **combining industrial performance with environmental responsibility** with the aim of **reducing our carbon footprint by 38% per MW IT built by 2030**.

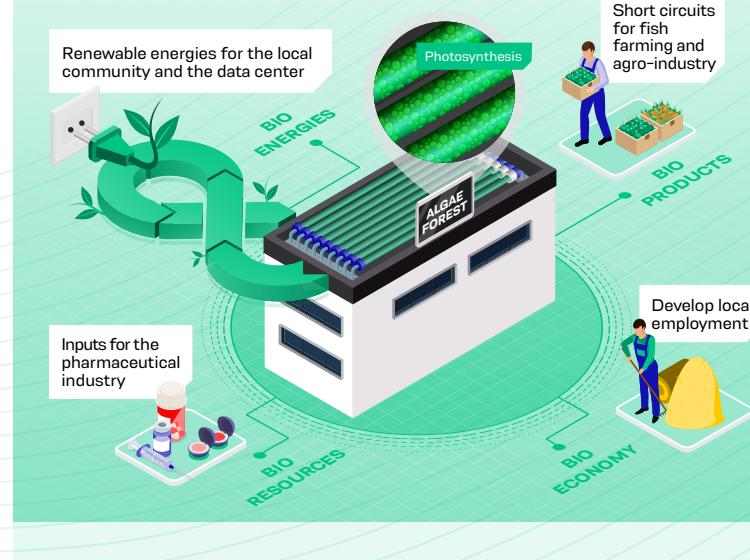
### → **An ambitious R&D project to reuse waste heat**

In partnership with the prestigious **Paris-Saclay University**, we have initiated a pilot project in the Essonne territory aiming to **create the first bio-circular data center**. This collaboration, supported by the Conseil Départemental de l'Essonne departmental council, brings together a multi-disciplinary team of experts from CentraleSupélec, AgroParisTech, INRAE, the ICMMO laboratory at Paris-Saclay University, the start-up Blue Planet Ecosystems and the Data4 teams at our Marcoussis site.

**The aim** is to reuse part of the heat generated by a data center to grow algae via a photosynthesis mechanism. This algae will then be used as biomass to develop new sources of circular energy and in the manufacture of bioproducts for other industries, such as the agri-food and pharmacology sectors. This innovative initiative aims to **increase the rate of reuse of waste heat**, thus exceeding the traditional heat reuse solutions which only use around 20% of this energy.

### The world's 1<sup>st</sup> bio-circular Data Center

PILOT PROJECT FOR A CIRCULAR ENERGY ECONOMY AND HEAT REUSE BETWEEN A DATA CENTER AND ITS LOCAL COMMUNITY



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*This augmented biomass project meets two of the major challenges of our time: food security and the energy transition. It requires close collaboration between all the stakeholders in the Essonne territory, including Data4, to develop a genuine circular ecology project aimed at pooling resources and reducing consumption in the territory.*

**Linda Lescuyer**

Head of Environment & Sustainable Innovation

## Our indicators in 2024

Data4 is constantly on the lookout for new innovative technical solutions to reduce greenhouse gas emissions (GHG).

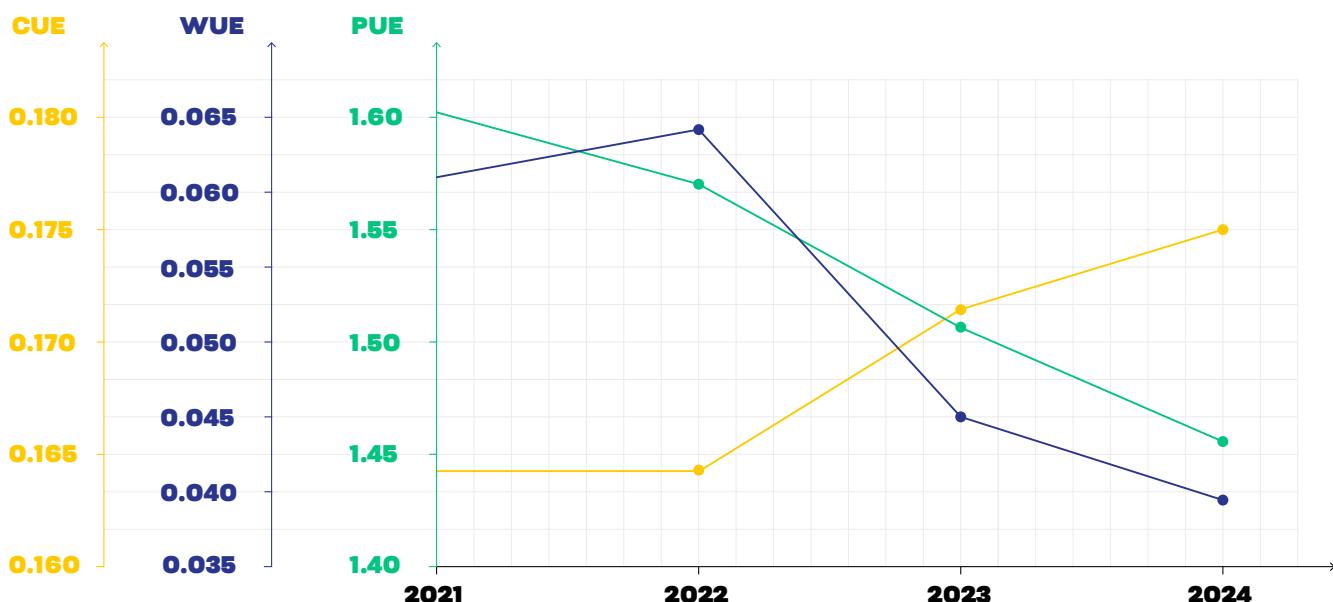
Since 2024, Data4 has generalised over 50 eco-design options and solutions for all data center projects.

In 2024, Data4 also continued to invest in Low Carbon Label certificates to offset the residual GHG emissions of Scopes 1 and 2.

To offset all residual GHG emissions for Scope 3 relative to the construction of its new data centers in Europe, in 2024, Data4 continued its partnership with the French company Igloo France Cellulose, which produces cellulose wadding, a bio-sourced insulation material made of 90% recycled paper fibre and used for thermal and acoustic insulation in buildings.

	Power Usage Effectiveness <b>PUE</b>	Water Usage Effectiveness <b>WUE</b>	Carbon Usage Effectiveness <b>CUE *</b>
<b>2021</b>	<b>1.605</b>	<b>0.061</b>	<b>0.164</b>
<b>2022</b>	<b>1.569</b>	<b>0.064</b>	<b>0.164</b>
<b>2023</b>	<b>1.514</b>	<b>0.045</b>	<b>0.172</b>
<b>2024</b>	<b>1.458</b>	<b>0.039</b>	<b>0.175</b>

\*different data to the previous years as the emission factors have been updated with retroactive effect



## GHG emissions in 2024

<b>Our objective</b>	Achieve carbon neutrality for Scopes 1 and 2 by 2030 Reduce our Scope 3 by 38% by 2030
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Scope	Types of emissions (in TeqCO2)	2020	2021	2022	2023	2024
01	Direct GHG emissions	1,301	2,939	2,966	2,342 <small>(a)</small>	1,862
	location-based - Data4	10,921	13,316	19,349	20,059	29,573 <small>(b)</small>
	location-based - Customers	17,907	23,043	32,233	38,243	61,553 <small>(b)</small>
	market-based - Data4	0	0	0	0	0
02	market-based - Customers	0	0	0	0	0
	Other indirect emissions	16,265	49,195	42,496	97,064 <small>(a)</small>	80,170 <small>(c)</small>

### Carbon intensity (scopes 01 & 02)

Market-based / Data4 + customers	2020	2021	2022	2023	2024
Carbon intensity per GWh	5	9	7	5 <small>(a)</small>	3

(a): Fuel used for commissioning counted in Scope 3 in accordance with the GHG Protocol rules => modification with retroactive effect

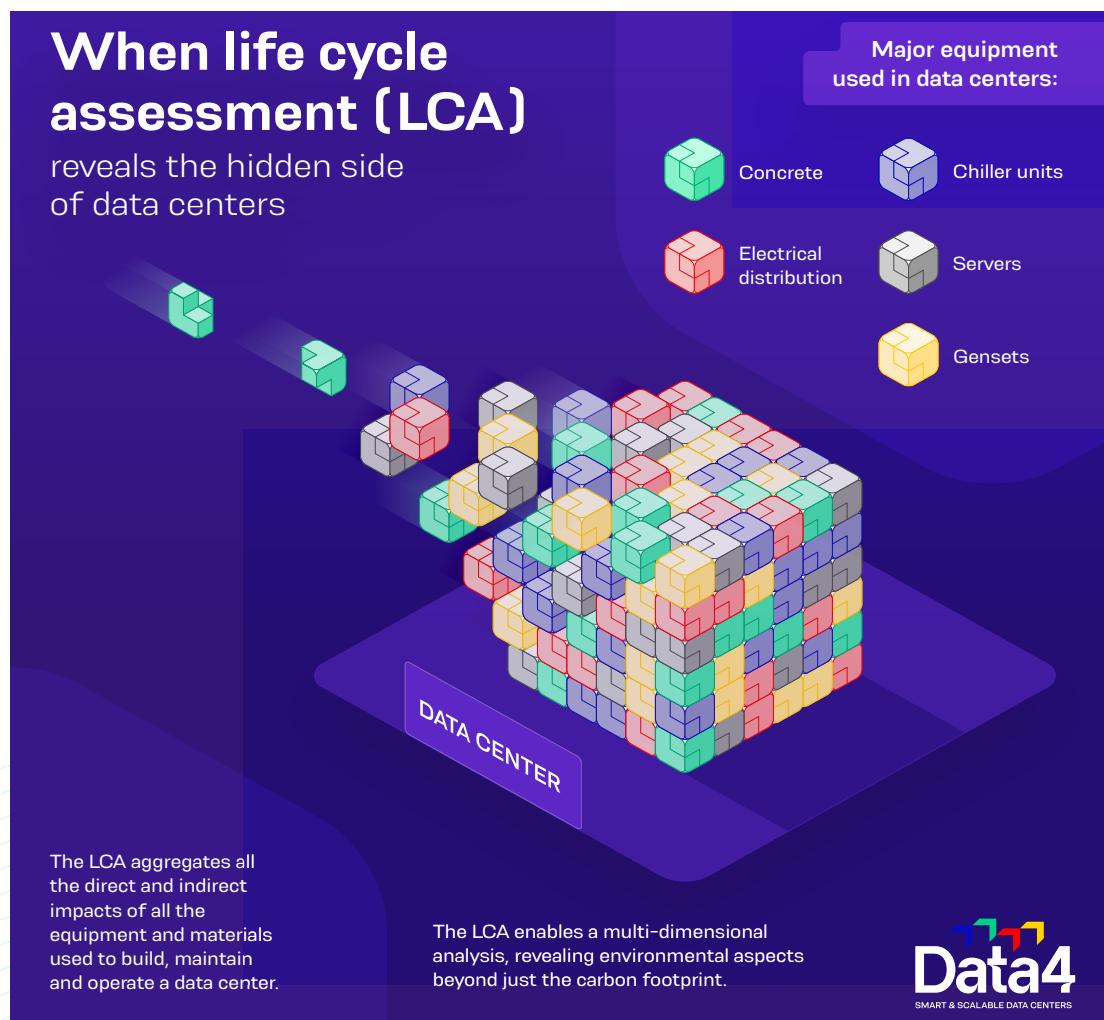
(b): Sharp rise in electricity consumption and emission factors of the national grids

(c): Fewer DCs built in 2024

## To go further

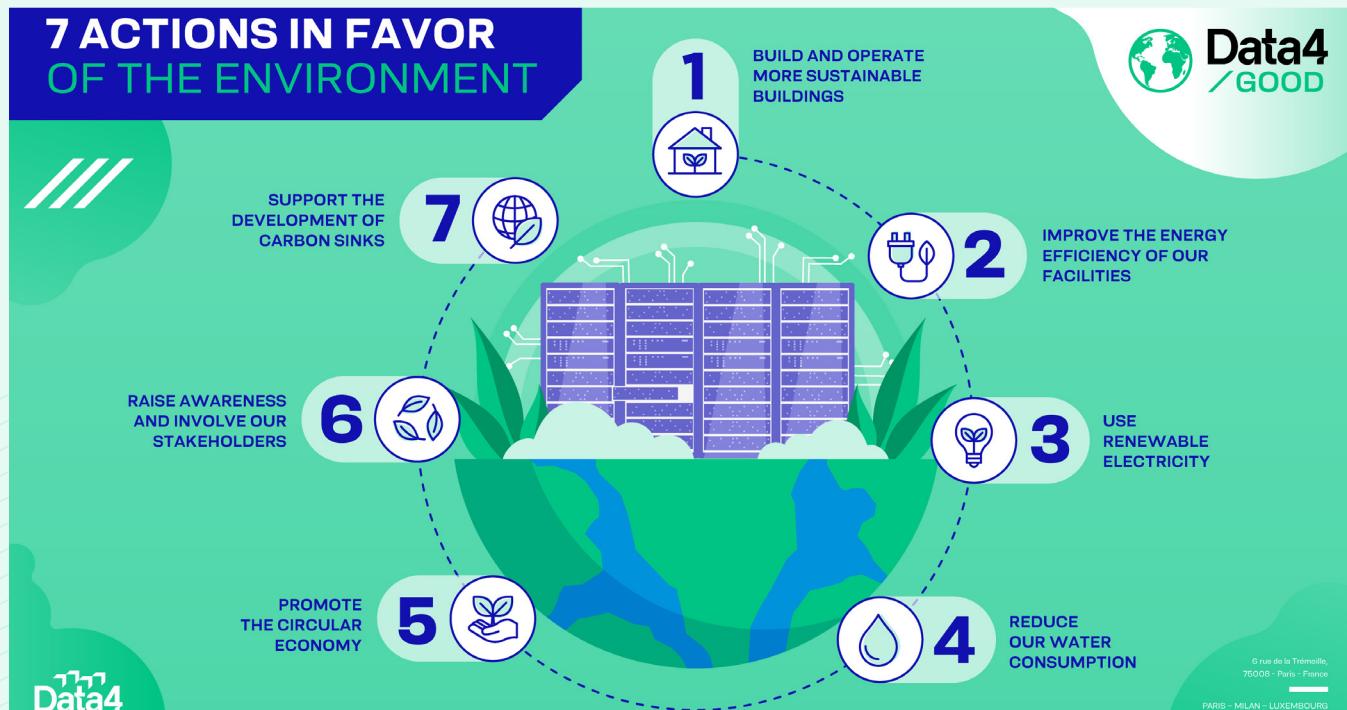
Since 2020, Data4 has routinely carried out Life Cycle Assessments (LCA) during the design of our European data centers. This comprehensive approach makes it possible to assess the environmental impact of a data center's entire life cycle with a high degree of accuracy, revealing that 20% of emissions are generated during construction and 80% during operation over a period of 20 years. It

also enables potential areas for improvement to be identified for each project. This approach goes beyond the "simple" analysis of greenhouse gas (GHG) emissions, since it takes into account **eight environmental impact indicators** such as climate change, natural resource depletion, depletion of the ozone layer, energy consumption, water consumption and freshwater eutrophication.



### Coming soon

A white paper on LCA produced in partnership with APL Data center, a company specialising in consultancy, engineering, production and operation of data centers and which analyses the life cycle of our infrastructures.



## Our objectives

- **Carbon neutrality** for Scopes 1 and 2
- **38% reduction for Scope 3** (SBTi trajectory)
- **PUE <1.2** for all our new data centers
- **Waste reduction** at source
- **BREEAM certification** of 100% of our new builds
- **100% renewable energy**

## Action #01 Building and operating more responsible buildings

### Achievements in 2024

- Data4 has generalised the **eco-design directives** for all data center projects, including 56 mandatory sustainable technical requirements.
- Continued implementation of our **low-carbon cement strategy beyond foundations and slabs**.
- Continued **BREEAM certification** for new projects, with 19 certifications in progress in 2024.
- Use of **HVO fuel** for the generator sets, for which global GHG emissions are 70% lower than those generated by standard fuel.
- Use of **refrigerants with very low global warming potential** (GWP) for the chiller units and gradual replacement of the previous refrigerants with high GWP (five data centers were treated in 2024).
- Installation of a **medium-voltage distribution panel** without SF6 in the Milan 8.2 DC, enabling a 70% reduction in CO<sub>2</sub> emissions during operation.

### Results obtained

Implementation of all the eco-design guidelines, including low-carbon concrete solutions, has already enabled a **13% reduction in the carbon footprint** of every new MW IT built.

Two **"Excellent" BREEAM certifications** obtained in Spain (MADO2 campus) and in Poland (DCO2, WAWO1 campus)

## Action #02 Improving the energy efficiency of our facilities

### Achievements in 2024

→ Data4 develops innovative solutions such as the **Direct Liquid Cooling of the servers**, with over **250 MW under design**, and works with suppliers to explore more reliable, efficient technologies. On its French Marcoussis campus (Essonne territory), a pilot installation has been implemented to support the scaling up of all these new solutions while at the same time improving operational performance, maintainability and energy efficiency.

### Results obtained

Reduction of our PUE by **9% in three years**.

## Action #03 Using renewable electricity

### Achievements in 2024

→ Data4 guarantees that each kWh of energy is generated from a renewable source, either via Certificates of Origin, or via **power purchase agreements (PPA)**. In France, Data4 concluded two energy purchase contracts with the French leaders Eurowatt and Photosol for a total of 150 GWh in 2024 with projects to extend to other countries.

### Results obtained

**Signing of two PPAs**

## Action #04 Reduce our water consumption

### Achievements in 2024

→ Data4 does not use cooling towers or adiabatic cooling systems, which are known for their water consumption. This enables the group to achieve a **high level of water usage efficiency (WUE)**.

### Results obtained

In 2024, our **WUE was 0.039 litre/kWh IT** at group level as compared to 0.061 litre/kWh IT in 2021 (the average WUE in the industry lies around 1 L/kWh IT).

For 2025, Data4 plans to explore innovative solutions aiming to reduce the use of water fit for human consumption still further by using greywater, rainwater or industrial waste water instead.

## Action #05 Encouraging a circular economy

### Achievements in 2024

- Launch of the pilot project for the first bio-circular data center on our Marcoussis campus. Objective: experiment with **heat recovery** to foster the production of algae.
- Support the reuse of heat by emerging heat networks in France (PAR3 site), Spain (MAD2 site) and Germany (FRA1 site).

### Results obtained

Through our waste treatment policy, the amount of waste recycled or reused increased from **10% to 83% between 2021 and 2024**.

Green Circle “**zero waste to landfill**” **certification obtained** for our data centers in France, Spain, Italy and Poland.

## Action #06 Raising awareness and involving our stakeholders

### Achievements in 2024

- Introduction of a new **responsible purchasing policy** (see Governance page) which invites our main suppliers to provide environmental product declarations (EPD) for equipment such as UPS, chiller units, generator sets and CDUs.
- Continued development of our “**Green Dashboard**” tool which enables our customers to measure the environmental footprint of their servers and that of the building infrastructure via their customer portal.
- Introduction of a **business code of conduct** (see Governance page).

## Action #07 Supporting the development of carbon sinks

### Achievements in 2024

- Our continued support in the development of carbon sinks through a **voluntary carbon sequestration** approach via **Fransylva** (reforestation projects in France) and **Igloo France Cellulose**, a company based in Vendée.

### Results obtained

**Offsetting of all our residual GHG emissions** in Scopes 1 and 2 and the emissions linked to the construction of new DCs for Scope 3.



## Being an engaged stakeholder in our territories

At Data4, we are fully aware of the impact that industrial activity can have on a territory. For this reason **we make every effort to integrate seamlessly into the local landscape, taking into account the environmental, social and cultural aspects of our development projects and working closely with the authorities and local authorities.**

Each day, the number of people going to our European sites is rising steadily. Our objectives by 2030 are even more ambitious. In parallel, we work on a daily basis to make sure that Data4 investments benefit as many stakeholders as possible in the local communities. Our commitment goes beyond industrial activity. We support the younger generation, raising their awareness to new technologies and environmental issues to prepare the talents of the future. At Data4, we don't just want to have a positive impact on the local communities. We want our impact to be sustainable.

## Highlights of 2024

**2**

**NEW  
ACQUISITIONS  
(LAND)**

in Milan (MIL02) and  
Athens (ATH01)



**more than 400 PUPILS**

came to visit our  
campuses in Europe

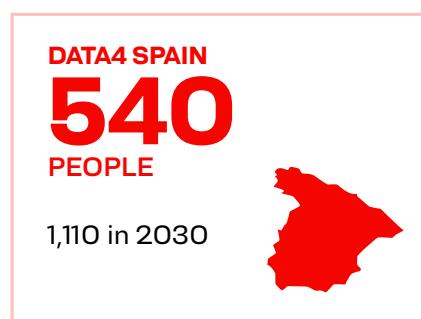


## Focus on jobs in the territories

Our business sector is a combination of several cutting-edge technologies in the fields of IT, mechanical engineering and electricity. A diverse range of profiles are involved in the daily operation of our data centers, from IT experts

and data analysts to industrial equipment manufacturers, cooling and wiring specialists. The evolution of jobs at Data4 follows a cycle linked to the construction and operating phases.

→ **Jobs (FTE) on site in 2024 and forecast for 2030 (\*) (\*\*) :**



\* Like in the aeronautical industry, the complexity of the technologies used and the speed at which they are changing means long-term suppliers and partners are essential to develop the skills of the sector throughout the life of the DC.

\*\* These jobs are intrinsically linked to multi-year contracts with our customers. By their very nature, they cannot be relocated elsewhere and are not subject to economies of scale.

## Our 5 objectives

### #01 Work on our integration into the local area

- Organise open days on our campuses for inhabitants
- Set up services for inhabitants around our campuses
- Contribute to the life of the local community
- Participate in local events relevant to Data4



Open-air cinema session in Marcoussis (France)



Olympic torch relay at Marcoussis (France)

### #02 Contribute to training, education and employability

- Organise visits for secondary school and university students (Data4 Academy)
- Employability/rehabilitation/training

Students from the Telecom Paris school at Marcoussis (France)



Students from the École Polytechnique (Spain)



École des Mines de Paris (Poland)



Students from the École Polytechnique (Italy)

## #03

## Raise awareness and work with institutional stakeholders

▼

- Organise campus visits for political figures and the administration
- Meetings and events organised on our campuses
- Participate in working groups organised by public authorities



Laying the first foundation stone in Athens (Greece)



Inauguration of DCO9 in Milan (Italy)

## #04

## Innovate for the environment and local communities

▼

- Seek and develop innovative partnerships with local stakeholders in the research sector for the bio-circular data center project which will be tested in May 2025. (E.g. Paris-Saclay University foundation)
- Launch and deploy projects to recover the heat generated by our data centres on all our campuses in Europe

Paris-Saclay Summit 2024  
 - Choose Science (France)



Football Stadium Sponsorship (Spain)



Donation of equipment sponsored by Data4 to the fire brigade (Poland)



## #05

## Present the many positive externalities of our sector



*In 2024, we stepped up our actions in the territories where we operate in collaboration with local stakeholders to combine innovation, positive social impact and reduction of our environmental footprint.*

**Jérôme Totel**

Group Strategy and Innovation Director



## Making Data4 a great place to work

This year, we have once again placed our employees at the heart of our CSR strategy, reaffirming our ambition to unlock each individual's potential. We have stepped up our efforts to **encourage internal mobility** and offer **opportunities for advancement** to our employees.

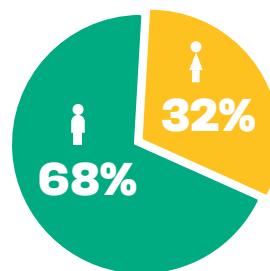
In this way, six people took up positions of responsibility, confirming our determination to recognise and promote the skills already present within our teams. We have set up customised training courses and skills assessment tools to help each employee to achieve their professional goals.

## Highlights of 2024



+ 29%: increase in workforce numbers in 2024  
+ 66%: objective for 2025

Most hiring took place in Italy and Spain



The group has 68% men for 32% women

Our objective is to achieve a ratio of 60/40 in 2027



88%

Employee satisfaction in 2024 (it was 87% in 2023)

Take-up rate of the Meeriad\* solution up by 28%

\*Meeriad: mental well-being application for companies

# 2024: focus on internal promotion

At Data4, **employees are developing**, whatever the country:

“



*I am honoured to take over the management of Data4 Spain and to contribute to bolstering our position as the European leader on the data center market. This promotion is a wonderful opportunity to pursue our efforts in innovation and sustainable development while supporting our customers in their digital transformation.*

**Francisco Ramirez**

Country Director - Spain

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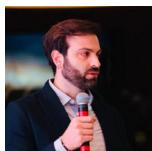


*I am very happy to take up this new post in charge of management control which enables me to make strategic decisions, improve the processes and collaborate with the executive committee to guarantee the excellence of our financial management.*

**Léa Plocharski**

Head of Controlling Group - France

“



*I am delighted to take on this new role, supervising the critical infrastructure of our data centers in Italy, collaborating with our teams and partners and ensuring that we meet the needs of our customers.*

**Pietro Santoro**

Facility Manager Lead - Italy

“



*In 2024, we supported the internal promotion of around ten employees, particularly to managerial functions, thus confirming our commitment to promote and develop internal talent.*

**Marion Enjolras**

Group Human Resources Director

# Our Health and Safety policy: Data4Safe

At Data4, **health and safety (H&S) are absolute priorities**, as evidenced by the commitment of our President and CEO, Olivier Micheli: "Anyone who enters one of our campuses in good health must also leave it in good health." With our **Data4Safe program**, implemented in all the group's entities, we are aiming for an ambitious goal: zero serious accidents.

This goal has been achieved for many years. Furthermore, our LTIFR (Lost Time Incident Frequency Rate) also improved by 2.07 in 2024 at group level (this indicator takes into account our employees and all our service providers).

Our H&S program is broken down into **7 key areas**:

- governance
- involvement of Data4 employees
- satisfaction of our customers' expectations
- involvement of our suppliers and service providers
- exemplary management of our campuses
- optimisation of our processes and tools
- raising the awareness of all our stakeholders

In 2025, clear objectives were defined for each of these key areas as well as dedicated action plans. At Data4, health and safety are a shared responsibility borne by everyone, everywhere, all the time.



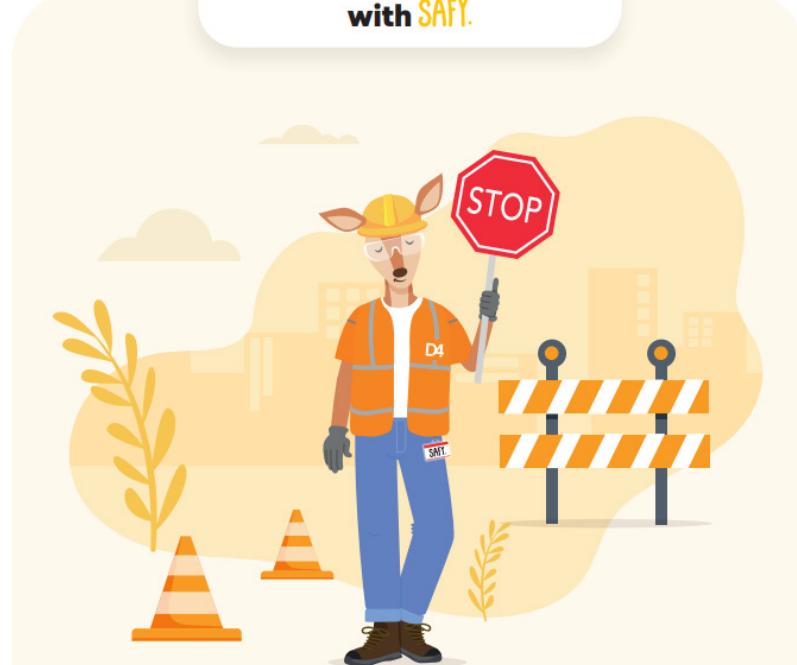
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*The health and safety of everyone present on our campuses is the number one priority at Data4. Every action we set up is geared towards this, with the aim of making everyone a stakeholder committed to the preservation of health and safety. Our ambition is clear: zero serious accidents.*

**Jean-Paul Leglaive**

Head of QHSE & Sustainable Development Group

**Life matters,  
safety first.  
with SAFY.**





## Being an exemplary leader in our industry

At Data4, our governance is the foundation of our commitment to sustainable development. It guides our strategic and operational decisions, carefully combining economic performance, business ethics and our social and environmental responsibility.

We implement rigorous, transparent governance practices, encouraging collaboration between all our stakeholders to achieve our ambitious objectives. Whether it be our responsible purchasing policies, the ethical management of our partnerships or compliance with European standards, we integrate sustainability criteria at every stage of our activity. This approach embodies our vision to build a resilient, innovative model which respects future generations.

## Highlights of 2024



Introduction of a responsible purchasing policy



Intensification of our reporting to satisfy the new European regulations (CSRD, Taxonomy, EED)



Introduction of a business code of conduct and an internal whistle-blowing system

## Focus on our responsible purchasing policy

In 2024, we consolidated our responsible practices, integrating CSR criteria into all stages of our supply chain:

### Digitalisation and **transparency of processes**

### Compliance and **ethics of suppliers**

- ▶ Through the introduction of a Procure-to-Pay (P2P) tool, we have strengthened traceability, reduced inefficiency, digitalised our procedures and optimised payments to suppliers.
- ▶ Verification platforms and specific questionnaires have enabled us to limit the risks of non-compliance, corruption and environmental impact.

### **CSR criteria** in the award of contracts

### **Responsible contracts and audits**

### **OFCI approach**

- ▶ Up to 20% of the weight of decisions is based on criteria such as energy efficiency, the use of sustainable products, respect for human rights and promotion of diversity.

- ▶ 100% of our contracts include CSR clauses, and we have organised four factory visits to assess our partners according to social and environmental criteria.

- ▶ We have adopted a model guaranteeing efficient and sustainable equipment while encouraging our partners to take responsibility for improving their practices.

## Our ambitions for 2025

### 80%

**of critical equipment** will be assessed against CSR criteria during calls for tenders.

**All our strategic partners** will be validated according to qualitative, financial, ethical and CSR standards.

### 6 supplier audits

will include in-depth assessments of their social and environmental performances.



“

We are proud to make responsible purchasing a strategic lever for a sustainable model. By making CSR central to our practices, we combine economic performance, social impact and respect for the environment while strengthening the resilience and competitiveness of our group.

**Hanane Pelissier**

Group Procurement Manager

## Focus on our business code of conduct and our whistle-blowing system

In 2024, we deployed a business code of conduct and a whistle-blowing system at group level.

### → A business code of conduct

At Data4, our **business code of conduct** embodies the fundamental values which guide our actions: integrity, professionalism, ethics and honesty. This code applies to all employees and our external partners, such as suppliers and consultants, when they act in our name. It defines the expected behaviour to guarantee exemplary internal and external relations, thus reinforcing our reputation as a reliable, professional partner.

Any violation of this code is taken seriously and may lead to disciplinary measures, in accordance with the laws and regulations currently applicable. We also encourage transparency and responsibility by setting up procedures to report any alleged breach, ensuring confidentiality and the protection of whistle-blowers.

### → An internal whistle-blowing system

At Data4, we have set up a **whistle-blowing policy** in compliance with European directive 2019/1937 and the relevant national legislation. This policy encourages all members of Data4, including employees, consultants and partners, to report in confidence any breach, unethical behaviour or irregularity of which they have become aware during the course of their professional activity.

We guarantee that all reports are confidential and ensure adequate protection for whistle-blowers against any form of reprisals. Reports can be made via dedicated internal channels, ensuring transparent, responsible management of the information received. This approach is part of our commitment to maintain exemplary corporate integrity and promote a culture of transparency within our organisation.



“

*Transparency and integrity are at the heart of our governance. With our Code of conduct and our internal whistle-blowing system, we guarantee an ethical, responsible framework for all.*

**Caterina Crivellaro**

Group Legal Director

## Summary of commitments



### Environment

#### Commitment

- ▶ Define a new trajectory validated by the SBTi

- ▶ Reduce our GHG emissions during the construction and operating phases of our data centers

- ▶ Reduce our water consumption

- ▶ Reduce the proportion of waste sent to landfill

- ▶ Roll out a program in favour of biodiversity

- ▶ Create a carbon fund for the study of innovative solutions

#### Actions and results

- Decarbonisation trajectory currently undergoing SBTi validation
- GHG assessment each year according to the GHG Protocol method
- Carbon neutrality approach initiated

- Integration of eco-design into projects
- Optimisation of energy performance and infrastructures
- Enhanced monitoring of consumption and GHG emissions
- Reduction of operational PUE by 9% between 2021 and 2024

- Very low WUE (0.039 L/kWh IT as compared to 0.045 L/kWh IT in 2023)
- Optimised cooling
- Enhanced monitoring of consumption

- 87% of waste recycled in 2023
- 100% of WEEE recycled
- Waste sorting on all sites
- Green Circle certification obtained for all our campuses

- Biodiversity study launched on several sites
- Integration into the 2024 environmental roadmap

- Creation of a carbon fund in progress
- Identification of pilot projects



### Territories

#### Commitment

- ▶ Be a committed player in the local community

#### Actions and results

- Two new acquisitions in Italy (MIL02) and in Greece (ATH01)
- Creation of direct jobs on all our campuses in Europe
- Strong partnerships with local authorities, schools and institutions
- Over 400 pupils have been to visit our campuses
- Participation in local associations in the data center sector

## Summary of commitments



### People

#### Commitment

► **Development and well-being of employees**

- 100% of employees had an annual appraisal
- E-learning platform available
- Mental well-being solution deployed (Meeriad)
- Structured induction process
- Internal survey: 88% global satisfaction (87% in 2023)

► **Growth of workforce numbers and parity**

- + 29% in 2025 (objective of 66% in 2025)
- 68% men, 32% women (objective 60/40 in 2027)

► **Health and Safety on our campuses**

- Application of the Data4Safe + program
- Zero serious accidents in 2024



### Governance

#### Commitment

► **Set up robust CSR governance**

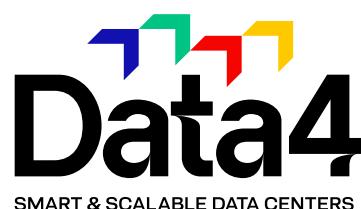
- Operational CSR committee
- ESG reporting on 100% of activities
- Presentation to the executive committee

► **Reinforce ethical practices**

- Ethical policy formalised through a business code of conduct
- Introduction of an internal whistle-blowing system
- Internal communication on the rules of conduct

► **Deploy a responsible purchasing approach**

- 100% of critical suppliers have signed the responsible purchasing charter
- Start of supplier CSR audits
- ESG monitoring integrated into the purchasing chain



[www.data4group.com](http://www.data4group.com)