

colt

# Sustainability Report 2022



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## About this report

Our Group Sustainability Report covers the period 1 January to 31 December 2022, unless otherwise stated. The report includes sustainability performance data across the Environmental, Social and Governance (ESG) material issues identified and prioritised as part of the materiality assessment conducted in 2021. The report covers all entities under Colt Group Holdings Limited (“Colt Group”).

We developed this report in accordance with the Global Reporting Initiative (GRI) Standards. The sustainability activities reported by Colt Group have been independently verified by the British Standards Institution (BSI).

More information can be found in Appendix 9.3. External Assurance statement by BSI.

For more information about Colt Data Centre Services (DCS), please consult our 2022 Sustainability Highlights Report.

## 1. Colt at a Glance

<b>5,461</b> Colt Group Employees	<b>16</b> State of the art carrier neutral Colt DCS data centres spanning 8 countries	<b>73</b> Record-breaking Colt EU NPS in Q2 '22	<b>3</b> Colt DCS facilities on the journey to Zero Waste to Landfill Certification	<b>98.3%</b> Colt Group employees completed training on data protection	<b>7</b> Employee networks
<b>75,452</b> Pieces of equipment reused in 2021 and 2022	<b>€427,000</b> Donated by Colt to charities and Disasters Emergency Committee	<b>100+</b> Industry awards received since 2007	<b>98.5%</b> The completion rate for Conscious Inclusion training at Colt Group	<b>-30%</b> tCO2e decrease in Colt Group emissions (market-based) across all Scopes compared to 2019	<b>97.7%</b> Colt Group Employees have completed the Code of Ethics training
<b>70.4%</b> Active suppliers engaged on ESG topics	<b>3.6%</b> Increase in percentage of females in senior roles at Colt Group compared to 2021	<b>72</b> Colt DCS Global NPS Score	<b>1<sup>st</sup></b> Voice and data communications provider to get the approval of the Binding Corporate Rules*		



## 2. Introduction

### 2.1. Keri Gilder - CEO, Colt Technology Services

I am incredibly proud to present our second annual sustainability report. Since the first report, we have set more ambitious targets, doubled down on working with our supply chain and received significant recognition for our efforts. Our ESG commitments are at the heart of how we do business and our approach is ESG by design; this means we build ESG principles into everything we do, and we do so from the outset.

We have made great progress on our ESG journey in 2022. We've reset environmental targets to make them even more challenging, including a long-term net zero target aligned to the new SBTi net zero standard, refreshed our ESG strategy, worked closer with our partners in the supply chain and started reporting to a higher standard.

Awards and recognition from the broader industry are a great way to see that we're doing the right things. In 2022 we received the Platinum rating from Ecovadis, placing Colt in the top 1% of global businesses for sustainability, taking into account ratings for action and commitment in four categories: environment, labour and human rights, ethics and sustainable procurement.

We are proud that our people want to get involved in ESG. We have seven employee networks that push forward discussions and action on issues that matter to our teams, and our Diversity, Equity and Inclusion (DEI) strategy is focussed on fully understanding how accessible our business is for everyone.

We are doing all of this because it matters – to Colt, to our people, to our customers, to our partners and to society as a whole. It's the future of doing business and a key reason why customers are making Colt their digital infrastructure partner of choice.

I am excited to push forward this ambitious agenda in 2023 and to share our progress with you next year.

**Keri Gilder, CEO, Colt Technology Services**



## 2.2. Niclas Sanfridsson – CEO, Colt Data Centre Services

Since our first annual global sustainability report last year, we have taken important steps in delivering our sustainable hyperscale strategy and staying true to our vision ‘to become the most customer centric data centre operator’ in the industry.

2022 proved to be a year that tested our resilience and ability to adapt, as the world struggled to navigate through the ongoing situation in Ukraine, the global energy crisis and turbulent economic conditions. Despite these challenges, we managed to make significant progress on our sustainability ambitions. I would like to thank our employees, customers and shareholders for their unwavering support and commitment to our success.

Our priority over the past year has been to develop and progress on our Colt DCS stand-alone ESG strategy, focusing on three strategic themes: Decarbonising our business, Connecting people and Safeguarding our company. As the data centre industry continues to grow, it is more important than ever that we focus on our ESG commitments. I’m proud to present our progress and accomplishments across these three strategic priorities in this year’s sustainability report.

### Decarbonising our business

The ESG strategy reinforces our commitment to become a net zero business by 2045. We’ve taken steps to integrate renewable energy sources into our operations, increased engagement with our suppliers, implemented new technologies and our new data centres will be built in line with the environmental requirements outlined in our Global Reference Design document

### Connecting people

From customers and suppliers to local communities and our colleagues, we are striving to create a lasting positive impact on stakeholders across our entire value chain. Employee wellbeing remains critically important, leading us to launch designated Wellbeing Days to prioritise the physical and mental health of our employees. As we look towards the future, we remain committed to investing in the development of our employees, as well as strengthening our partnerships with suppliers and customers.

### Safeguarding our company

Underlying all of this is our commitment to systematically embed sustainability across all relevant parts of our business, ensuring that every colleague, customer and supplier is working towards the same ambition. Our management systems and policies ensure we run our business responsibly and to the highest ethical standards

I am extremely proud of the progress we have made and am excited about the future. We are committed to continuously improving and will continue to progress on our ESG strategy.

**Niclas Sanfridsson,**  
**CEO**  
**Colt Data Centre Services**



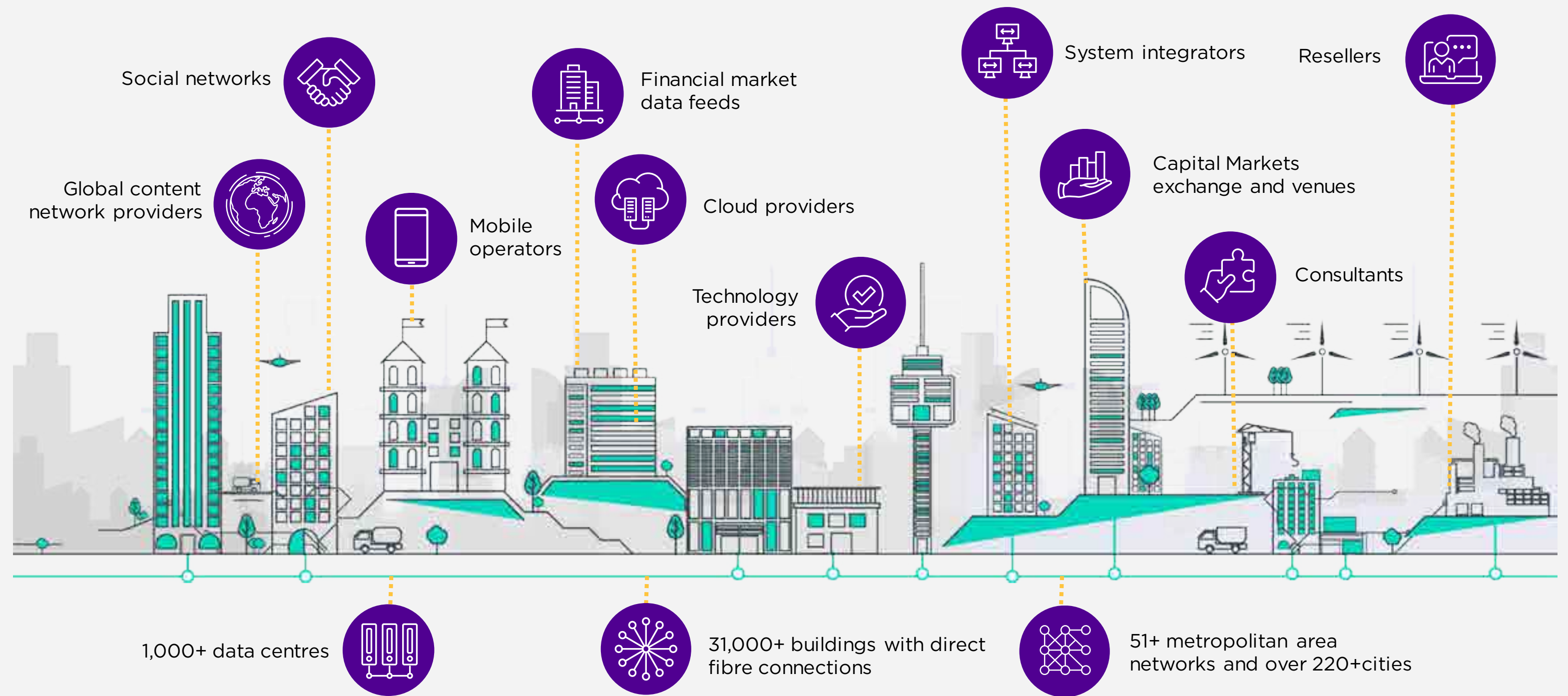
# About



### 3. About Colt Group

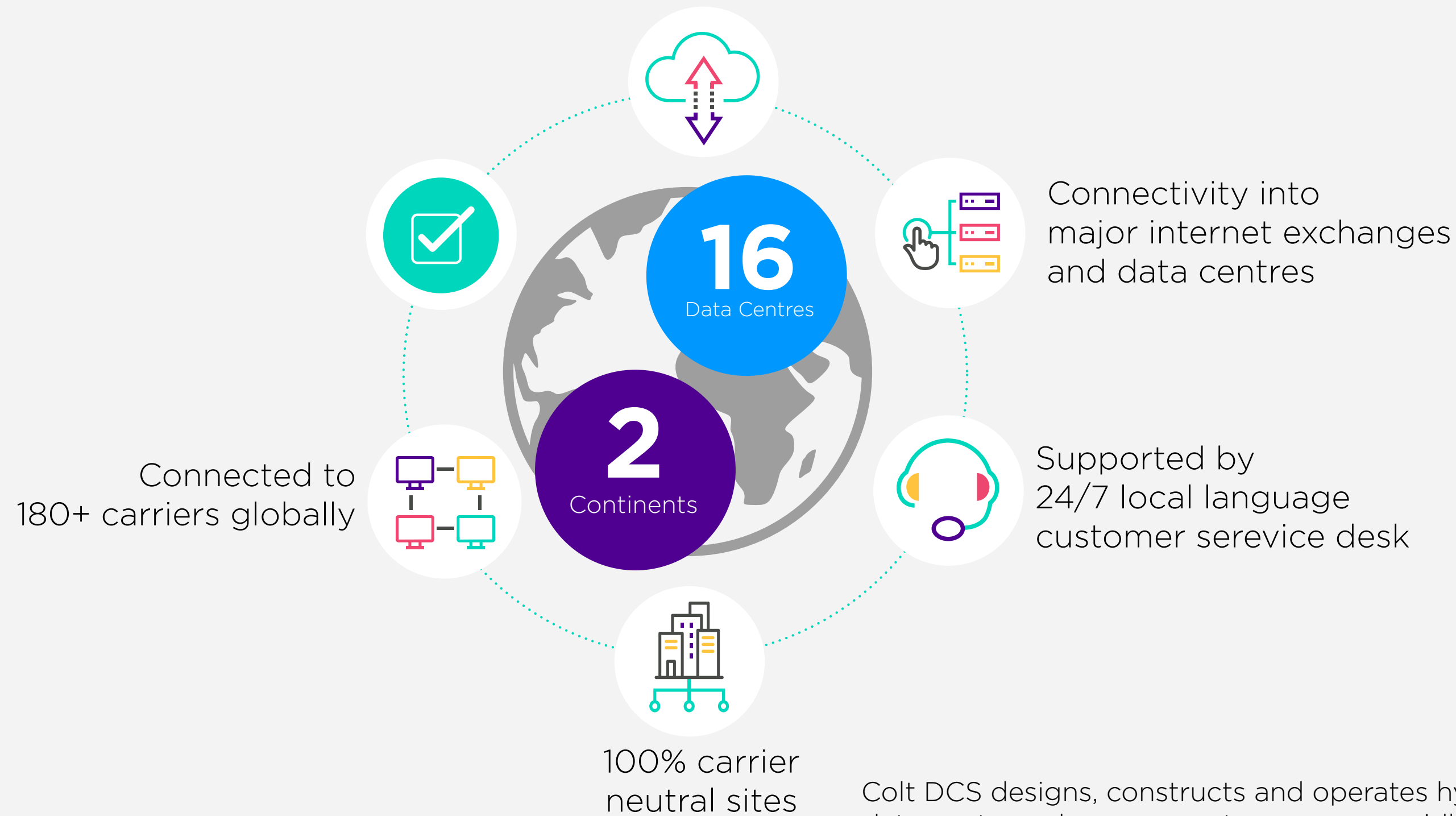
Colt Group is a multinational digital infrastructure and data centre services group headquartered in London. It operates two operationally distinct businesses: Colt Technology Services (“Colt”) and Colt Data Centre Services (“Colt DCS”).

#### Digital infrastructure is the foundation of today’s connected business



Colt is a global digital infrastructure company that delivers extraordinary connections with genuine care. Delivering industry-leading customer experience, Colt is guided by its dedication to customer innovation, by its values and its responsibility to its customers, partners, people and planet. The Colt IQ Network connects to more than 1,000 data centres and over 31,000 on net buildings across the world’s largest business hubs. [www.colt.net/about](http://www.colt.net/about)

Direct connectivity into major cloud platforms



Colt DCS designs, constructs and operates hyperscale data centres where our customers can rapidly scale capacity to support their business needs. We provide data centre services to some of the largest Cloud Service Providers and large enterprise businesses across state-of-the-art data centres in Europe and the APAC that are carrier and Internet Exchange neutral. [www.coltdatacentres.net](http://www.coltdatacentres.net)

<b>ISO 9001</b>	Quality
<b>ISO/IEC 20000-1</b>	Service Management
<b>ISO/IEC 27001</b>	Information Security
<b>ISO 14001</b>	Environmental Management
<b>ISO 22301</b>	Business Continuity Management

**Cyber Essentials Plus**

**Binding corporate rules (BCRs)**

**Management Systems**



colt | BCRs



An aerial photograph of a dense green forest. A paved road with white lane markings runs horizontally across the middle of the image. A white car is driving on the road. A large, semi-transparent heart shape is overlaid on the right side of the image, partially covering the road and forest. The background has a blue tint, and there are decorative elements: a cyan circle at the top, a purple circle at the bottom, and a white diagonal bar at the bottom right.

# Our sustainability strategy

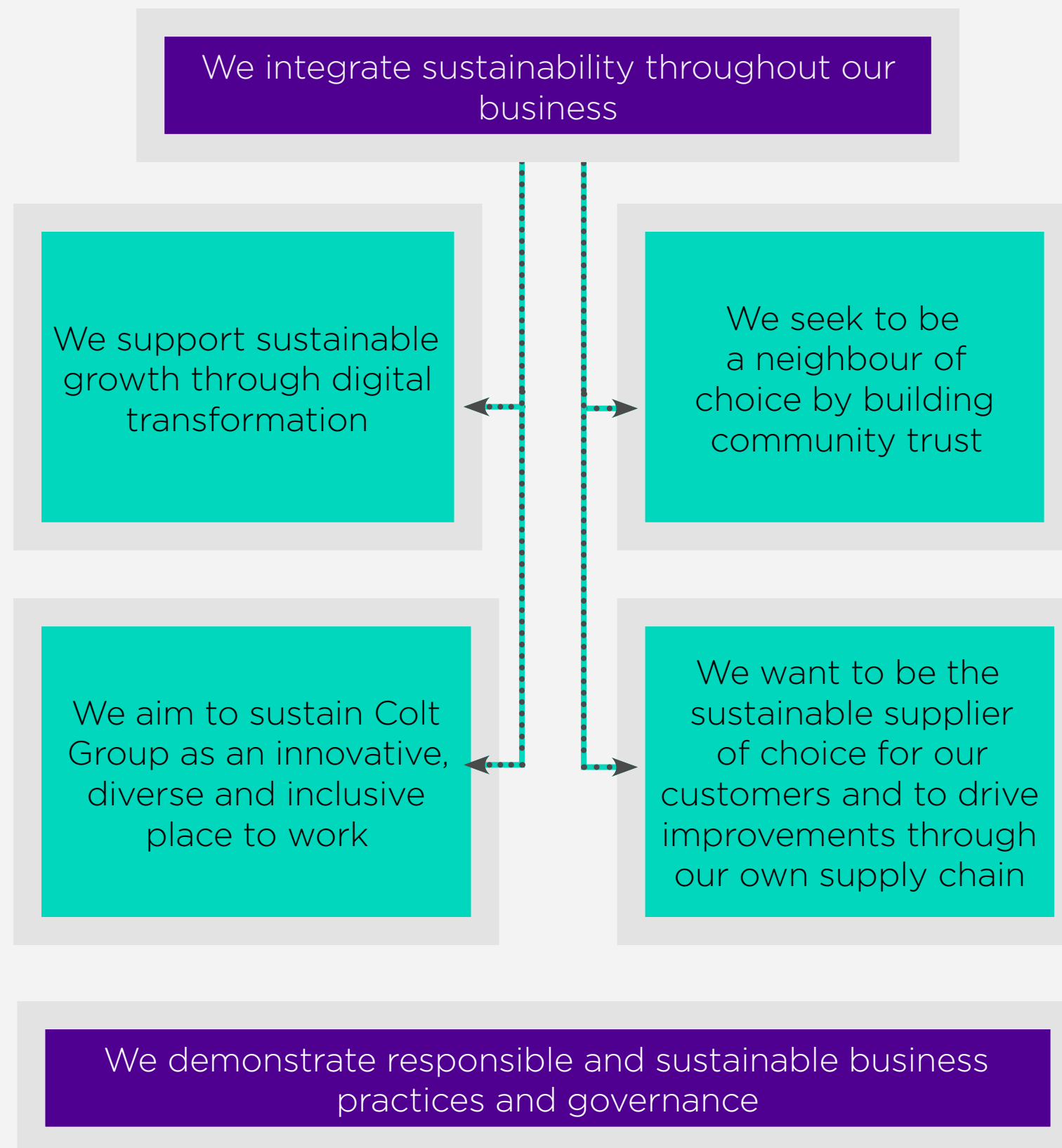


## 4. Our sustainability strategy

At Colt Group, we believe that sustainability is key to our business success. Our focus is on contributing to a more sustainable society through innovation and the promotion of technological solutions.

**Our role as a digital infrastructure and data centre services provider gives us an opportunity and responsibility to contribute solutions for a more sustainable future**

**Based on an extensive materiality analysis, we have developed a sustainability strategy that is supported by a series of strategic pillars.**



Top 1% of all rated companies



**B:** Management Level disclosing on Climate Change

**A:** Leadership Level for our engagement with suppliers on Climate Change

We report our sustainability activities to standards organisations such as the Carbon Disclosure Project (CDP) and EcoVadis. In 2022, we received a platinum rating from EcoVadis.

**In practice, this means that our sustainability activities are clustered around the following priorities.**



### Reducing our emissions

We have signed up to ambitious science-based targets that guide us on our journey to significantly reduce emissions across our operations and the whole value chain.



### Promoting diversity, equity and inclusion

We have put in place an ambitious programme of activities to create an environment of inclusion and diversity where everyone can thrive.



### Working with our suppliers

We run an extensive supplier engagement programme and collaborate to achieve progress across the entire sustainability agenda.



### Making a positive impact in our community

We actively engage with local communities, reduce our impact and make a positive contribution. Our employees are involved in charity initiatives across our global operations.

You can read more about Colt's ESG strategy on the [Colt website](#). More information about Colt DCS's strategy can be found on our website and in our 2022 Sustainability Highlights Report.

We are fully supportive of the UN Sustainable Development Goals (SDGs). Please see more details on Colt Group's contribution to SDG goals and targets in the Appendix [Colt Group's commitment to the UN Sustainable Development Goals](#).

# Collaborating for a sustainable future



## 5. Collaborating for a sustainable future



The Sustainability Report showcases Colt Group’s contribution to the Sustainable Development Goals (SDGs) and their targets.

### 5.1. Technology as an enabler for sustainability

Colt Group has always been a company that believes in the power of technology to drive the greater good. We have been at the forefront of technological advances which can provide solutions for society’s need to change.

Our business model is fundamentally supportive of sustainable development, as we support our customers to achieve their goals through the development and adoption of new technology solutions.

We believe that technology will play a major role in facilitating the transition to a lower carbon future and we are enabling customers in this transformation – through sustainable products, services, and equipment design and through promoting digital inclusion.

Colt is a member of the Global Enabling Sustainability Initiative (GeSI), a globally recognised thought leader, partner of choice and proactive driver of the sustainability agenda in the technology industry. We have been part of workings groups, co-innovating with industry partners, to deliver digital services to minimise the impacts on the environment.



As TM Forum members, Colt participates in the regional (Europe) TM Forum ESG Workshop. This initiative brings industry players with shared ambitions together to solve sustainability challenges across the digital economy and value chain.



### Frost and Sullivan Awards Colt Best Practices Company

Frost and Sullivan recognised Colt with its Best Practices Company of the Year award in the European Network Services industry. They highlighted Colt’s approach to integrating ESG across the whole business as one of the key reasons. We feel immensely proud that Frost and Sullivan has recognised our work so far and will continue to raise the bar and share progress against our ESG targets.

[Read more](#)



## 5.2. Delivering exceptional customer experience

Customer experience is at the heart of what we do. We have been at the forefront of helping our customers with pioneering networks, solutions and services since 1992, and with our data centre services since 2015.

**We work tirelessly to help build strong relationships with our customers to help them stay ahead and in control at every stage of the journey**

We have become a trusted adviser to our customers across cloud, software, data centres and technology. Increasingly, we support our customers to reduce their carbon emissions and develop innovative technology and data services to support customers' net-zero strategies. We have set science-based targets which align us with leading customers on their carbon reduction journey.

Our strong customer partnerships enable us to work with leading brands and growth business, providing jobs for employees and a positive impact on the economy.

### Private 5G Smart Office solution pilot

Colt partnered with its client Icade, a French real estate company, to test a smart office solution in La Défense, Paris. The aim of the private 5G project is to assess how the building can integrate the new technology to become a platform for the introduction of smart services and smart data. Leveraging this is critical to significantly reduce the overall carbon intensity of the building. Another aim of the pilot is to explore how the Private 5G network can replace all existing wireless networks.

[Read more](#)

## Colt's NPS reaches a record breaking 73 for Q2 in Europe

	2021	2022
Colt DCS NPS Europe & UK	72	76
Colt DCS NPS Asia	54	69
Colt EU NPS (Q4)*	66	63
Colt EU NPS average*	67	70
Colt Asia NPS (Q4)*	34	51

\*Colt compares favourably with the NPS Telecom Industry Benchmark which was 31 in 2021. Source: B2B benchmarks report copyright customer gauge © 2021. These are the most recent and reliable benchmarks available to Colt.

### An award-winning, industry-leading customer experience

We measure this through our Net Promoter Score (NPS). NPS is a key indicator of a company's ability to meet their customers' needs and a strong NPS score is synonymous with consumer loyalty and satisfaction.

We have an ever-evolving programme of customer intelligence that helps us to understand and improve the experience we give our customers.

Throughout Colt DCS's data centre portfolio, we set ourselves apart from competitors through our exceptional client service. In 2022, we achieved an impressive global NPS of 72, showcasing the quality of service and our efforts to be the most trusted and customer centric operator in the industry. We continue to enhance the customer experience and perfect our operational efficiency strategies, offering value to customers in terms of power availability and uptime, temperature and security management.



### Colt DCS applauded by Frost & Sullivan for delivering operational efficiency and value to customer

In recognition of Colt DCS's commitment to our customers, Frost and Sullivan recently awarded us with the Global Data Centre Infrastructure & Operations Customer Value

Leadership Award. Our customer service and ownership experience enables total flexibility and transparency with respect to operations and management. At Colt DCS, we develop long-term partnerships with customers to support their internal business processes.

“Colt DCS has dedicated a tremendous amount of time and resources to invigorate and bolster its operational and design solutions that address current unmet market needs and anticipated future customer requirements. It offers high standards in operation and management, delivering a truly holistic solution and substantial value to customers.”

**Gautham Gnanajothi - Global Research Director, Energy & Environment, Frost & Sullivan**

[Read more](#)

### Becoming the digital infrastructure company that the world's leading businesses choose to connect with

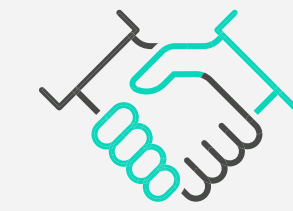
Colt won two trophies at the World Communication Awards, one for Best Customer Experience and another for Best Network Transformation Initiative. The judges praised Colt's customer experience strategy and operations, noting our focus on listening to customers and making doing business with Colt seamless across every touchpoint. Our consistently high NPS was also commended. For the Best Network Transformation Initiative, Colt's blockchain-based network, created in partnership with Console Connect, Deutsche Telekom Global Carrier and Vodafone, was recognised for guaranteeing first-time right invoicing and simplifying inter-carrier operations, ultimately boosting customer relationships.

[Read more](#)

### 5.3. Partnering with our suppliers

We seek out partners who share our values and we build relationships where we can add value to each other's business beyond products and services. Our aim is to be the supplier of choice for our customers and drive improvements through our own supply chain.

We rely on a wide network of suppliers to support the delivery of our products and services to our customers and we pride ourselves on the engagement with our suppliers.



4,500+

Active suppliers from 55 countries that Colt Group worked with in 2022

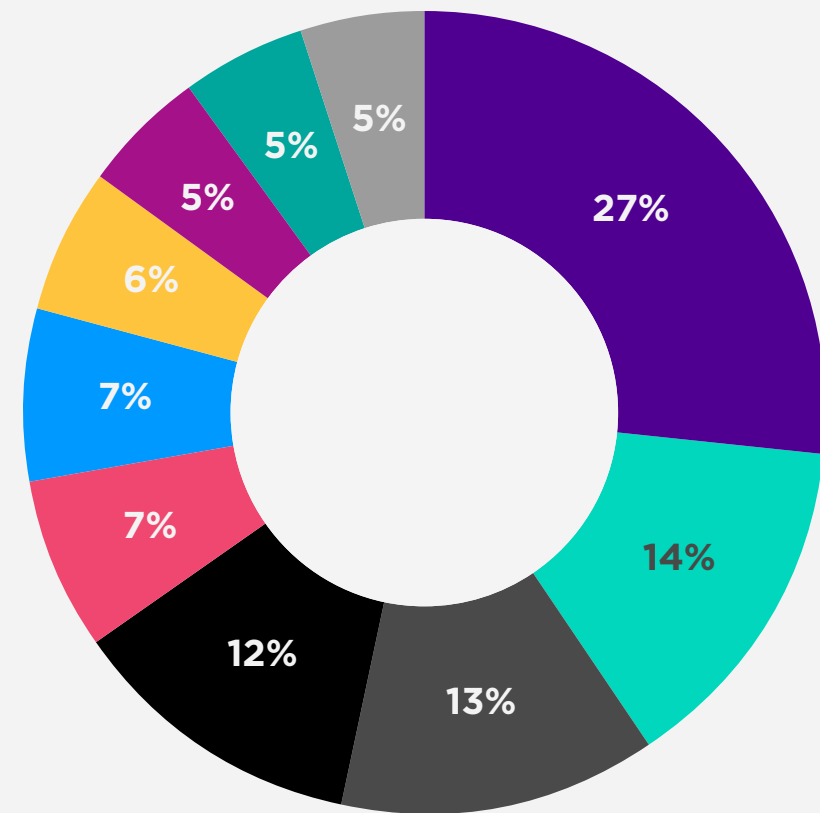
### Colt Group in the Supplier Engagement A Rating Leaderboard by CDP

We are proud to have received an A rating from the Carbon Disclosure Project (CDP) for our engagement with suppliers. As a result, we have been included in the Supplier Engagement Rating Leaderboard by CDP, which celebrates the highest-rated companies in terms of engaging their suppliers on climate change. By doing so, we are playing a crucial role in the transition towards a net-zero sustainable economy.

We understand that purchasing organisations like ours have the potential to incentivise significant environmental changes in our supply chain. Therefore, we have established a system to evaluate supplier engagement practices and recognise best practice, in order to increase our own engagement and accelerate action on emissions reductions in our global supply chains. We are committed to driving lasting improvements in management practices and promoting sustainability in everything we do.

[Read more](#)

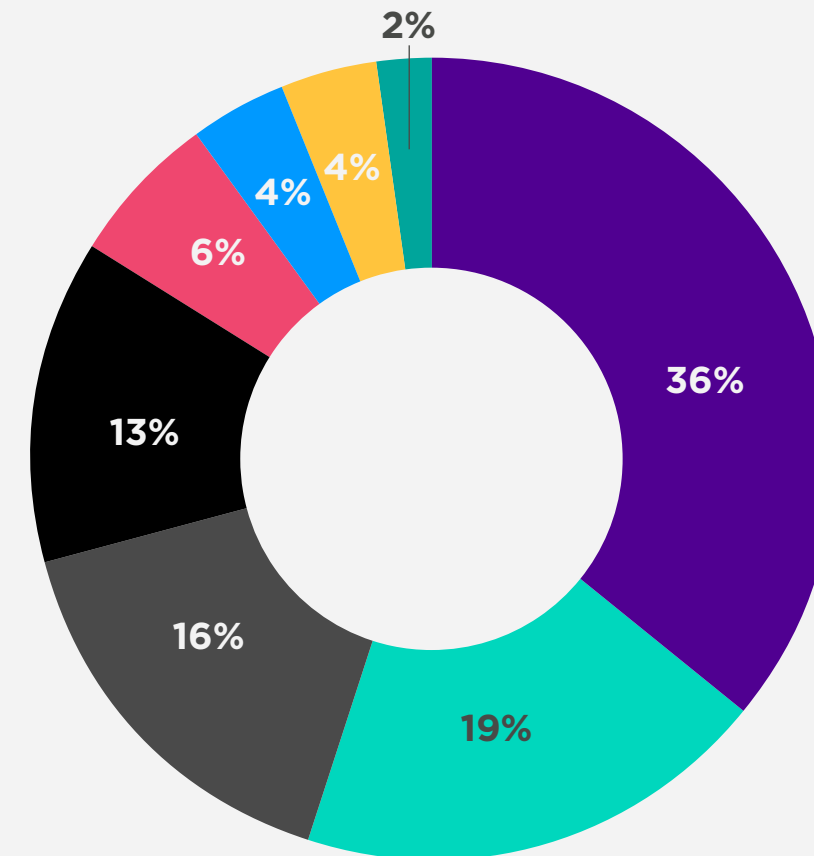
### Colt supplier types\*



- Colocation
- Network Infrastructure Services
- Other Licensed Operators
- Marketing
- Facilities
- Network Backbone
- Human Resources Services
- Network Electronics and Infrastructure Equipment
- Professional Services
- Other\*

\* Other includes: Real Estate, SWIN, Travel & events, Software, Financial services, Legal services, Fleet, Insurance, Hardware, Hardware, Voice services, Logistics and freight and Telephony. Colt DCS purchases energy on behalf of Colt that's why not energy supplier type is included in the pie chart.

### Colt DCS supplier types\*



- Services
- Building Maintenance & Construction
- Equipment Maintenance
- Utilities and Energy
- IT
- Security
- Third Party DC Space
- Marketing

\* Colt Group supplier types based on number of suppliers

Our [Supplier Code of Business Conduct](#) and our Sustainable Procurement Policy set out the standards of corporate governance and sustainability that we expect from our suppliers.



## 89.1%\*

Of our suppliers have signed our Supplier Code of Business Conduct

\* The remaining 10.9% of suppliers include those with comparable codes of conduct and those for which we are pending the confirmation

Our aim is to build long-term relationships with our suppliers and support their journey in sustainability. We integrate sustainability criteria in the selection (through our Vendor Risk Management system and our RFP Scoring), onboarding and ongoing management of our suppliers.

Together with our suppliers and contractors, we strive to create more transparency in our global and complex supply chains. In 2022, we developed increased reporting capabilities to track supplier sustainability performance.

The dashboards contain all relevant information from suppliers in terms of ESG performance, giving our procurement team a comprehensive understanding of how suppliers are performing.

In 2022, we engaged our suppliers on a wide range of sustainability matters including climate change, emissions, energy, diversity, equity & inclusion and our Code of Conduct.



## More than 70%\*

Of our suppliers have been engaged on ESG topics

\*Number of suppliers up to 31st December 2022



## 838\*

suppliers have been evaluated on environmental criteria

\*Number of suppliers up to 31st December 2022

### How we use EcoVadis to assess our supply chain

With EcoVadis we can assess our suppliers' sustainability performance based on criteria across four categories: Environment, Labour & Human Rights, Ethics and Sustainable Procurement. These criteria include topics such as greenhouse gas emissions, water use, labour practices, human rights, anti-corruption measures and sustainable sourcing.

By using EcoVadis to assess the sustainability of our supply chain, we can identify areas for improvement and work with our suppliers to implement more sustainable practices.

EcoVadis provides a standardised and independent rating system that enables us to compare the sustainability performance of our suppliers against industry benchmarks and peers. This helps us to make more informed decisions when selecting and managing suppliers.



At Colt Group we ran a dedicated supplier programme covering a wide ESG agenda with a special focus on our top suppliers in terms of emissions. To achieve our Scope 3 target, we have committed to engage with 93% of our suppliers by emissions (covering purchased goods and services and capital goods) to set Scope 1 and 2 science-based targets approved by Science Based Target Initiative (SBTi) by 2025.

### Supplier engagement day

We held an ESG event aimed at helping our suppliers to discover how they can strengthen their relationships through a focus on ESG. At the event, we shared our approach to environment, emissions and diversity, equity & inclusion. We had internal experts, as well as external consultants from Carbon Intelligence and EcoVadis, speak at the sessions. Over 250 participants joined us and we are proud that our suppliers are willing to join us on our journey to integrating sustainability across the business.

#### Suppliers

#### Colt Group

Evaluated on environmental criteria

**55.7%** of suppliers engaged have provided feedback through our sustainability questionnaire

Evaluated on Diversity, Equity and Inclusion (DEI)

**53.7%** of suppliers engaged have provided feedback through our DEI questionnaire



1,432\*

Of our suppliers have engaged on diversity, equity & inclusion matters

\*Number of suppliers up to 31st December 2022

### 5.4. Innovation at the core of what we do

Energy efficiency and emissions reduction are the backbone of our innovation strategy, ensuring we provide positive societal impact.

We talk about our technologies making everything smarter: smart working, smart industry and smart society.

Smart working technology, including software-defined wide area networks (SD WAN) supports remote and flexible working - making sure employees remain connected and productive.

We have implemented a multi-year transformation programme where we leverage Software Defined Networks (SDN), Network Function Virtualisation (NFV), Artificial Intelligence (AI) and Machine Learning (ML) to virtualise connectivity. This makes the operation of the network more intelligent, bringing IT workloads to the cloud and closer to the user, resulting in a more efficient network.

Smart industry and smart manufacturing also open routes for the optimisation of traditional manual processes.

### The enabling effect of our products and services

Colt Edge is the equivalent of a “Cloud for network services” but at the customer premise or network edge, where network services can be deployed as Virtual Network Functions.

Virtualisation enables a customer to move from multiple on-site, specialised hardware devices to a single, centralised server. This reduces the amount of hardware that electronics require to deliver network services and make the network more energy efficient.

## We invest in research on smart manufacturing and use the outcomes to implement emission reduction efforts



### Market data cloudification with AWS

Colt completed a pioneering cloud colocation Proof of Concept with Amazon Web Services (AWS). Our collaboration demonstrated the viability of hosting and distributing multicast data in the cloud for global capital market customers, leveraging the full benefits of cloudification of market data.

Our virtual distribution Points of Presence built in the AWS Cloud allows customers to host more applications into the cloud without the need for physical infrastructure, reducing service delivery SLAs from weeks or months to just days.

With the Colt IQ Network underpinning our financial market solutions, we continue to demonstrate our commitment to providing innovative, market-leading services to the global market all of which will increase connectivity and reduce energy use.

[Read more](#)

### Smart Manufacturing

Colt and IBM teamed up to launch a joint lab aimed at bringing Edge Cloud services, backed by IBM Cloud Satellite, to end customers. The move is expected to help address challenges in adopting Industry 4.0 technologies in the manufacturing value chain, such as IT and operational systems integration.

The lab will provide hands-on experiences for enterprises across the industry seeking to leverage and monetise 5G and edge capabilities such as visual inspection, supply chain telemetry monitoring, IT/OT security, remote management and threat monitoring. Colt will leverage its next-gen cloud SD WAN services and Colt Edge platform for the trial use cases.

[Read more](#)

We can use pioneering technology to further a smart society and address societal issues. We support the development of immersive collaborative tools which leverage artificial and virtual reality to team local technicians with remote experts. This is particularly relevant in industries such as manufacturing and transportation.

### 5.5. Innovation at our data centres

At Colt DCS, we integrate sustainability principles in the design of our data centres to support reduction in energy use and improve our environmental performance. We are driving innovation to reduce our environmental impact by leveraging intelligent sensors, LED lighting systems and on-site renewable energy generation.

Across our data centre estate, we are focused on building next generation hyperscale data centres that will reduce carbon emissions per megawatt hours.

In 2022, we developed the Global Reference Design (GRD) framework in which we outline our data centre design requirements. The framework includes requirements to reduce our environmental impact, from carbon management and the use of sustainable materials to energy efficiency and biodiversity.

## We are committed to design all our new data centres in line with the GRD requirements

This means that we will strive to certify all future data centres with a LEED Gold certification (or equivalent) with a specific focus on improving energy efficiency, transitioning to alternative fuels and reducing our operational waste.

Simultaneously, we continue to invest in upgrading our existing facilities to drive down energy use and improve the Power Utilisation Efficiency (PUE) of data centres. Hyperscale and smart data centre services will support society's growing demand for data use in an energy efficient and sustainable way.

# Caring for the environment



## 6. Caring for the environment



### 6.1. Our approach to environmental management

We are committed to minimising our impact on the environment by actively managing how we develop and deliver our products and services.

Our environmental approach is articulated in our [Environmental Sustainability Commitment](#) and is characterised by a comprehensive focus on reducing our Scope 1, 2 and 3 emissions, minimising the waste we produce and embedding circular economy practices in the way we deliver our products and services.

At Colt Group we comply with the ISO 14001 requirements for environmental management across all our European locations. Please [visit Colt website](#) to find out more about the scope of this certification.

We are an active participant in industry initiatives to address environmental sustainability in the technology sector, and we have launched several activities to solve sustainability challenges across the digital economy and value chain.

#### Sustainability certification at Colt Singapore office

The Colt Singapore office gained the Eco Office Champion award given by the Singapore Environment Council (SEC) for demonstrating excellence in accordance with the SEC's Eco Office assessment framework.

## Our employees have an important role to play in our efforts to address environmental issues

We are very proud of our local Green Teams, which were created to give passionate employees a forum to make environmentally impactful changes on site and in communities, and to engage colleagues through volunteering events and initiatives.

Launched in 2021, many of our country operations have now local green teams that run volunteering initiatives.



#### Colt Green team achievements

- **France:** Cycle Workshop: how to repair and clean your bike
- **Hong Kong:** Coffee grounds upcycling and ornament planting workshop.
- **Italy:** Waste collection campaign in Colt cities.
- **Romania:** Waste collection campaign in Sibiu Mountains
- **Spain:** Collaboration with a foundation that aims to reduce food waste by collecting vegetables and fruit that are not suitable for sale. This surplus food is prepared into local produce while creating job opportunities for those at risk of social exclusion.

**Antarctica**

Two Colt volunteer sustainability champions travelled with 170 people from over 35 nations, on the explorer Robert Swan's 2041 ClimateForce Antarctica Expedition. Participants collaborated on solutions and actions around the issue of climate change, sharing their thoughts with their teams once returning home.



**Global Sustainability Champions at Colt DCS**

Colt DCS Sustainability Champions organise initiatives to educate, inspire and involve colleagues in our sustainability journey. In 2022, the Champions organised Sustainability Month to raise awareness of topics that impact Colt DCS. Discussions around climate change, energy, waste, water and biodiversity were organised across our internal engagement platforms. As a result, we collected over 30 new ideas to reduce our environmental impact in and around our data centres.



Colt's internal communications team won the **Internal Communications & Engagement Award** by Communicate for our Sustainability Communications campaigns.

Colt was shortlisted in **Sustainability Leaders Awards 2022** for the category 'Employee management & behaviour change initiative of the year'

Shortlisted for **World Communications Awards**, The Sustainability Award; 2022 **Financial Times Innovative Lawyers Awards**, Sustainability and Responsible Business; and the 2022 **Glotel Awards, Climate Action Excellence**.



## 6.2. Our journey to net zero

Climate change is a key pillar of our corporate sustainability strategy. As a large company with worldwide activities, we want to lead by example when working with our suppliers, partners, customers and communities to reduce our impact on the environment.

In December 2022, Colt Group resubmitted an updated near-term science-based target to ensure the baseline is aligned to best practice and the most recent requirements set by the Science-Based Targets initiative (SBTi). These targets are now set on a baseline that includes Well-To-Tank (WTT) emissions for relevant Scope 3 categories.

We used this opportunity to update previously estimated data to actual data and split emissions by the two different entities (Colt and Colt DCS). We also submitted a long-term net zero target aligned to the new SBTi net zero standard.

Our emissions reduction strategy addresses greenhouse gas (GHG) emissions across our operations and the whole value chain.

**Our Long-Term Net Zero target has been approved by the SBTi in accordance with the SBTi Net Zero Standard, the world's first corporate net zero standard**

### Net Zero Target:

Colt Group commits to reach net-zero GHG emissions across the value chain by 2045.

### Near-Term Target:

Colt Group commits to reduce absolute scope 1 & 2 GHG emissions 47% by 2030 from a 2019 base year.

Colt Group commits to reduce absolute scope 3 GHG emissions 28% by 2030 from a 2019 base year.

### Long-Term Target:

Colt Group commits to reduce absolute Scope 1, 2 and 3 GHG emissions 90% by 2045 from a 2019 base year.

### Main initiatives to achieve Colt Group Net Zero targets:

- We will procure renewable power and achieve 100% Scope 2 renewable electricity for all sites globally by 2030. Future savings will be achieved through purchase agreements or self-generation.
- We will engage with our top 356 suppliers in terms of emissions (93% supply chain emissions) to request they align to a Scope 1 and 2, 1.5-degree science-based target by 2025.
- We will reduce indirect emissions by finding alternatives to travel and encourage colleagues to choose better travel options for the environment. We have set an internal cost for carbon of 11 GBP per tCO<sub>2</sub>e, with a plan to offsetting some of our business travel emissions by investing in green innovations such as Carbon Capture and Storage or internal decarbonisation projects.
- We will decarbonise our in-house fleet through electrification and we have committed to a 75% pure electric fleet by 2030, with an interim target of 38% by 2025.

## 6.3. Carbon management

In 2022, our carbon footprint was 446,886 tonnes of tCO<sub>2</sub>e (market-based), a decrease of 30.1% in absolute emissions compared to our baseline year 2019. We have continued to drive decarbonisation across our operations and value chain through efforts like procuring renewable energy power, increasing energy efficiency, implementing new technologies and engaging with our suppliers.

With the progress we made in 2022, we are on track to achieve both of our 2030 Science-Based Targets (SBT). Additionally, reviews of our annual calculation models have resulted in increased traceability and improved accuracy of our carbon footprint.

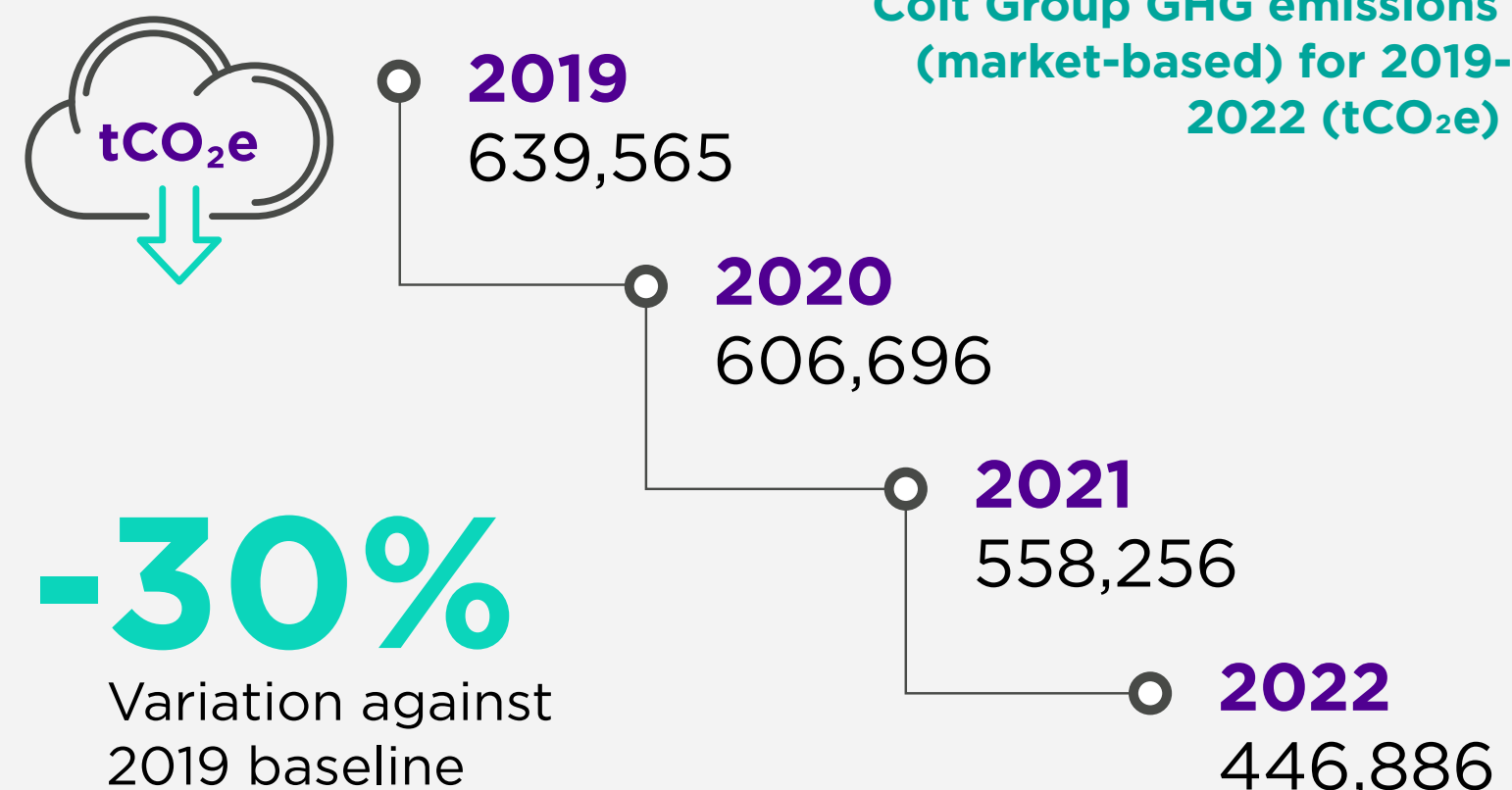
**In 2022 we reduced Colt Group's global GHG emissions (market-based) by 30% from our 2019 baseline**

### Colt Group GHG emissions in metric tonnes CO<sub>2</sub>e\*

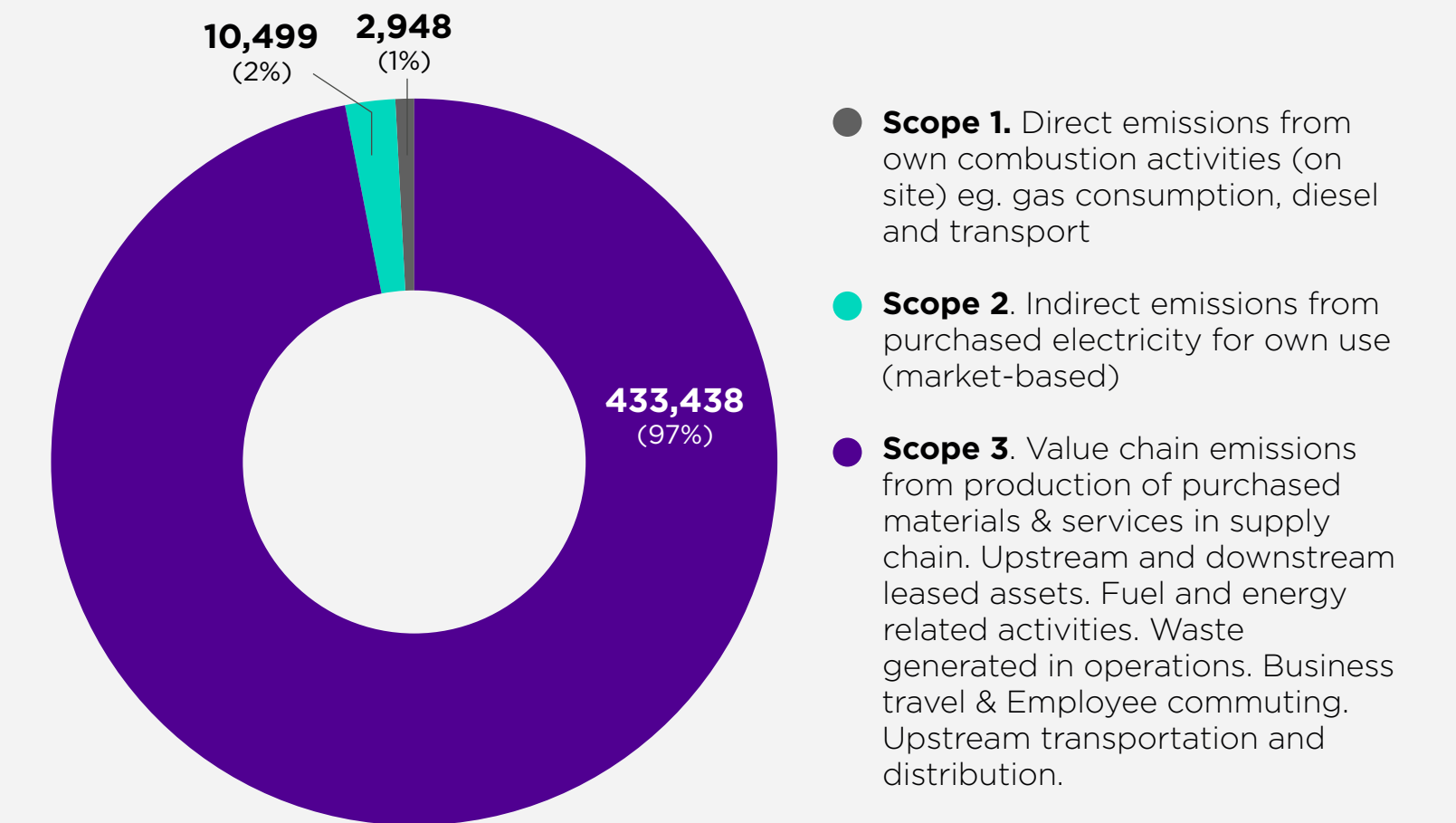
	2019 (base year)	2020	2021	2022	Variation against 2019 baseline
Gross direct (Scope 1) GHG emissions in metric tons of CO <sub>2</sub> e	4,459	4,297	3,259	2,948	-34%
Gross indirect (Scope 2) GHG emissions in metric tons of CO <sub>2</sub> e (market-based)	32,146	26,552	10,260	10,499	-67%
Gross direct and indirect (Scope 1+2) GHG emissions in metric tons of CO <sub>2</sub> e (market-based)	36,605	30,850	13,519	13,448	-63%
Gross Indirect (Scope 3) emissions in metric tons of CO <sub>2</sub> e (market-based)	602,960	575,846	544,737	433,438	-28%
Total emissions in metric tons of CO <sub>2</sub> e (market-based)	639,565	606,696	558,256	446,886	-30%

\*We aim to have the most accurate understanding of our impact on the environment. We are continually improving the management and measurement of Colt Group environmental data. As a result of this, we have recalculated our 2019 GHG emissions baseline and our 2021 and 2020 GHG emissions. Please, see more details about the recalculations and about Colt Group GHG emissions methodology in the appendix under 'Greenhouse gasses calculation methodology'

**In 2022, Colt Group independently verified its GHG emission calculations following the ISO 14064 standard**



### 2022 Colt Group GHG emissions (tCO<sub>2</sub>e)



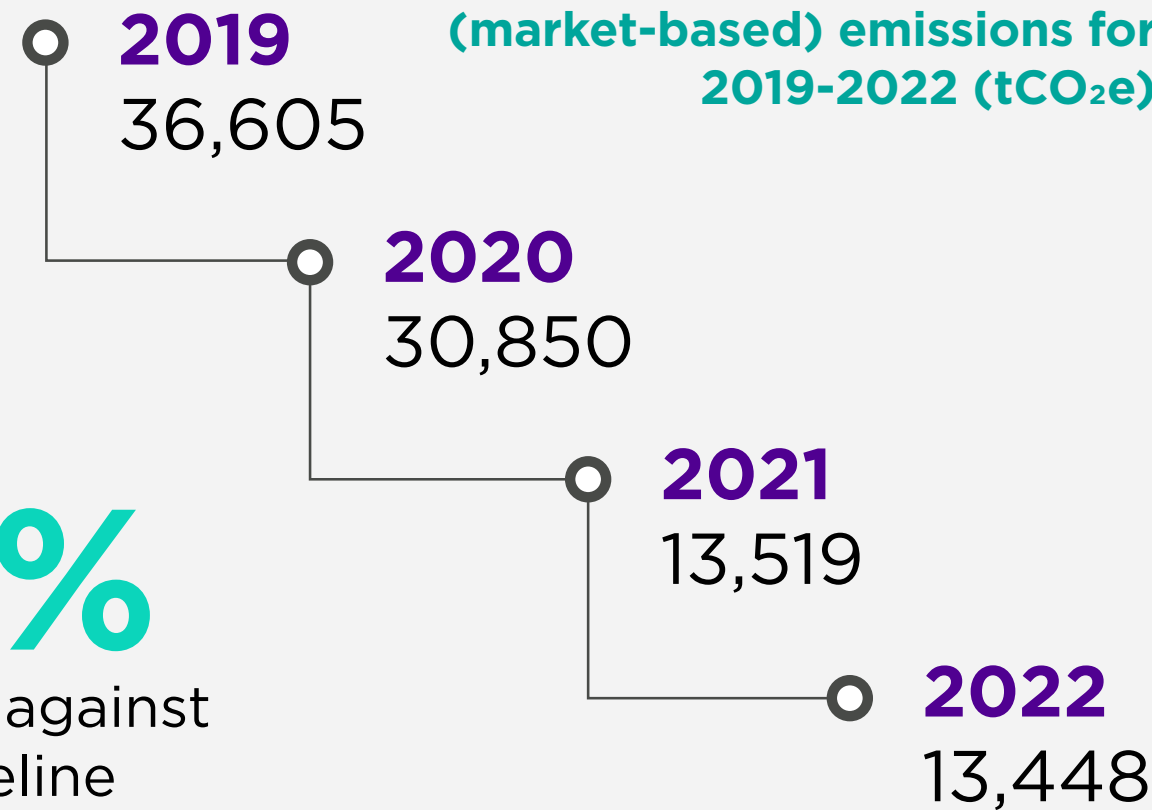
#### 6.3.1. Scope 1 & 2 GHG emissions (market-based)

**In 2022, Colt Group reduced Scope 1 and Scope 2 (market-based) GHG emissions by 63% from our 2019 baseline**

Colt Group Scope 1 and 2 market-based emissions in 2022 made up 3% of our overall emissions. Compared to Colt Group 2019 baseline, we have reduced our Scope 1 and 2 market-based emissions by 63%. This reduction has been achieved through an increase in the share of renewable electricity procured, increasing from 61% in 2020 to 74% in 2022. Read more about our renewable energy procurement and energy efficiency approach in [Section 5.4](#). The reduction in Scope 1 emissions is due to the closure of some data centres and an improvement in data coverage.



**Colt Group GHG Scope 1 & 2 (market-based) emissions for 2019-2022 (tCO<sub>2</sub>e)**



**6.3.2. Scope 3 GHG emissions**

Our Scope 3 emissions in 2022 made up 97% of our overall emissions. Since 2019, our Scope 3 emissions have reduced by 28%. This shows the positive impact of the efforts of the engagement with our upstream value chain partners.

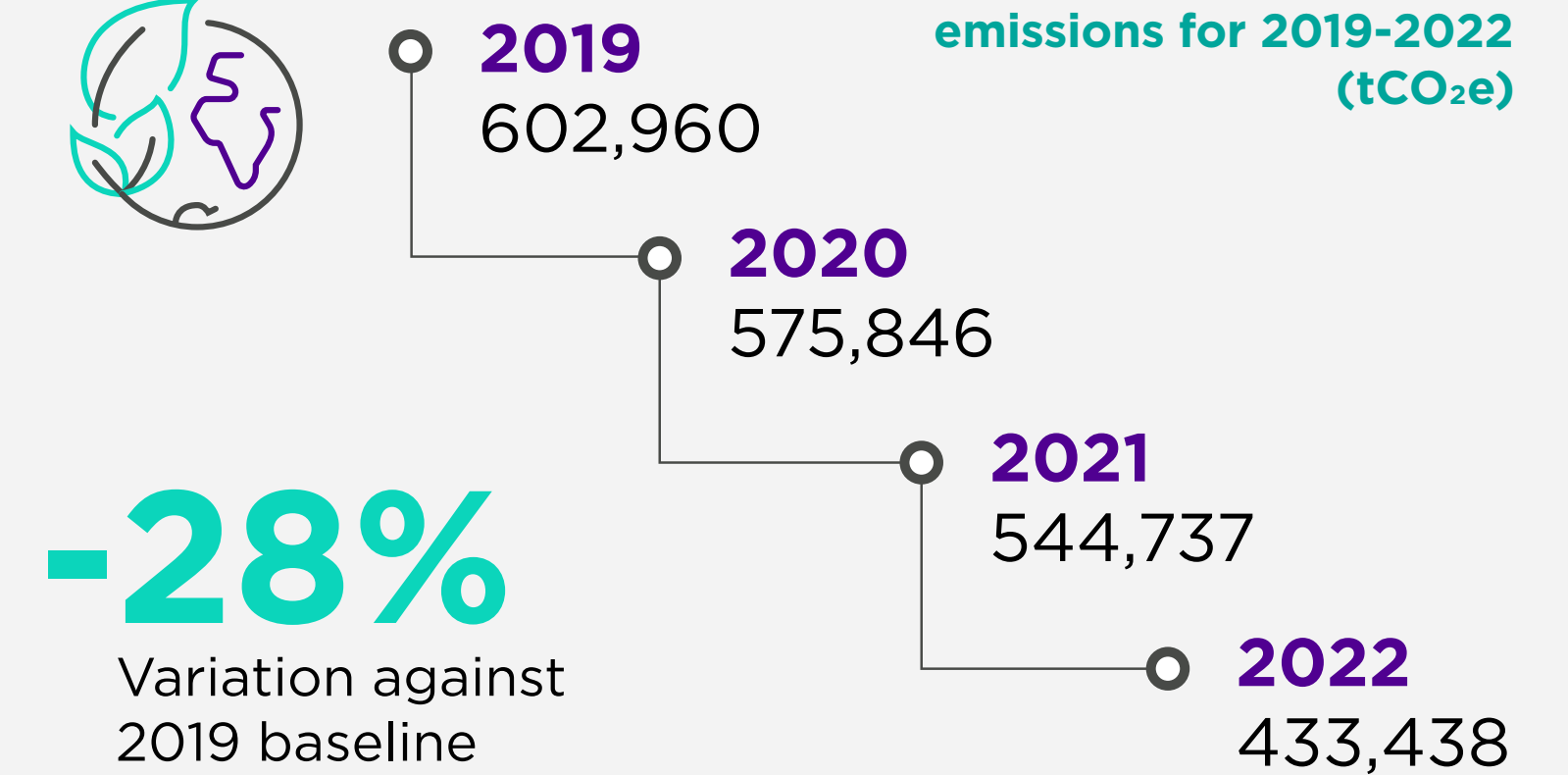
In 2022, we reviewed and improved our methodology for the calculation of GHG emissions related to Purchased Goods and Services (PG&S) and Capital Goods categories. We incorporated supplier-specific emissions for 12 Colt Group suppliers, covering 28% of total PG&S and Capital Goods emissions, based on public and externally verified GHG emissions data. With regard to spend-based data, we included an inflation rate correction factor to account for the significant inflation rate seen in 2022. Both methodology updates have resulted in the improved accuracy of our PG&S and Capital Goods calculations, which alongside our efforts to engage with our upstream value chain partners, have positively influenced our scope 3 emission reductions.

In 2022, Colt Group's top 356 suppliers were responsible for 93% of our PG&S and Capital Goods Scope 3 emissions. We recognise that engaging with our value chain is key to reducing our emissions and as a result have introduced a dedicated supplier programme to work with these companies to improve the quality and accuracy of emissions data and to drive actual emission reduction activities.

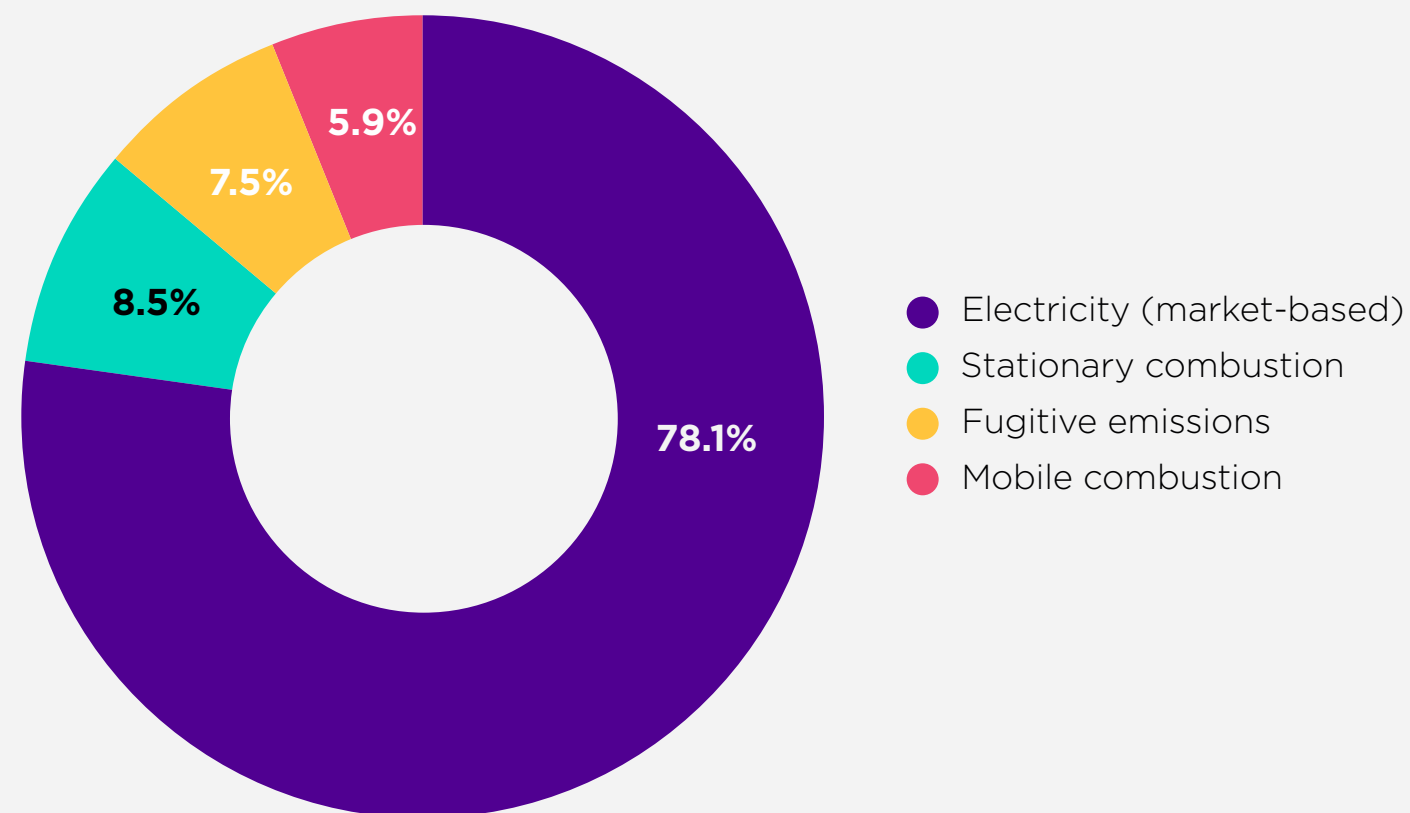
Read more in [Partnering with our suppliers](#).



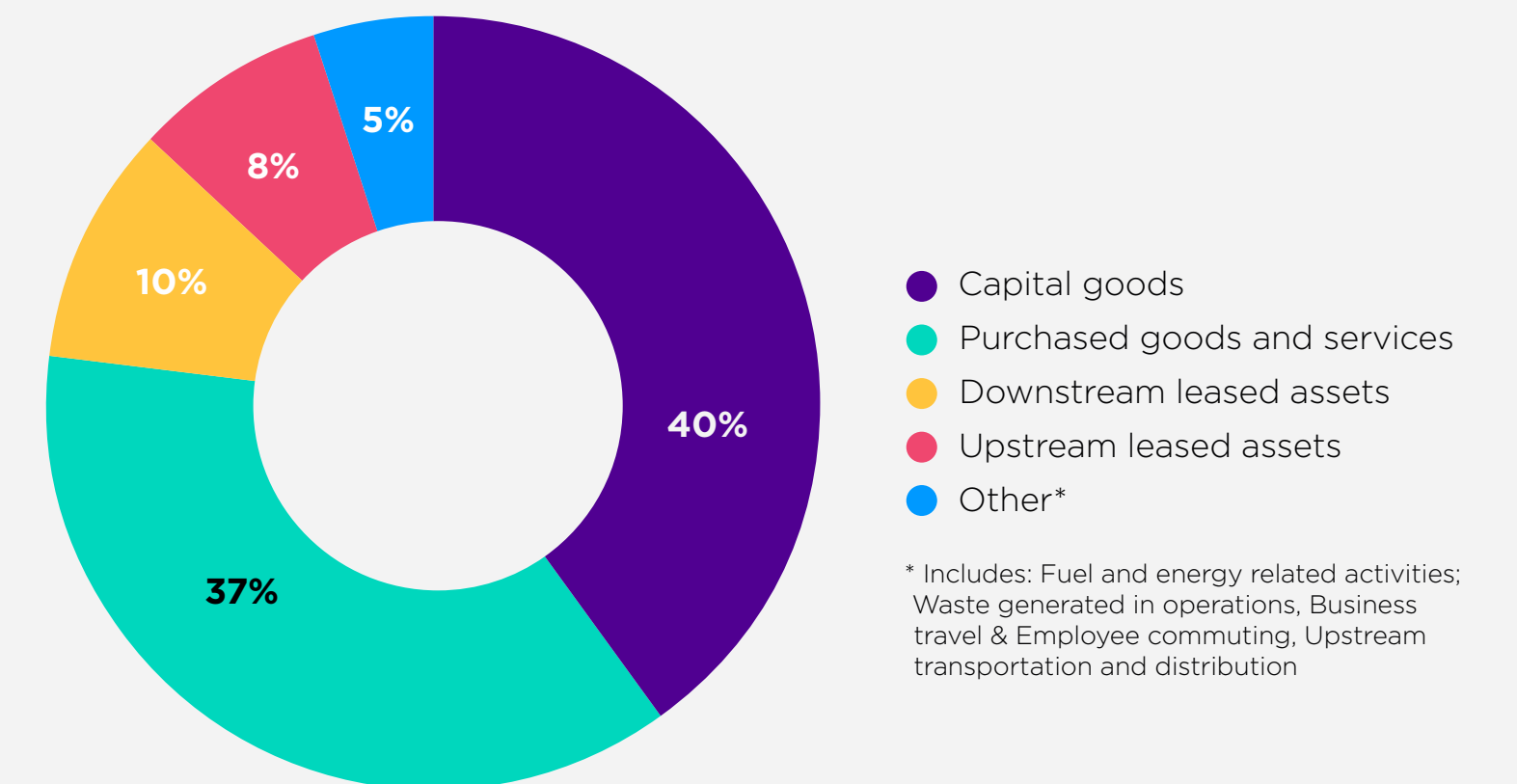
**Colt Group Scope 3 GHG emissions for 2019-2022 (tCO<sub>2</sub>e)**



**2022 Colt Group Scope 1 & 2 categories**



**2022 Colt Group Scope 3 categories**





Scope 3 also includes emissions from business travel, employee commuting and homeworking, upstream and downstream leased assets, and waste disposal.

We are reducing Scope 3 emissions by finding alternatives to travel and encouraging colleagues to choose better travel options for the environment. Between 2019 and 2022 our travel emissions have decreased by 73%. In addition, we have set an internal cost for carbon of 11 GBP per tCO<sub>2e</sub>, and plan to utilise this to offset some of our business travel emissions by investing in green innovations, such as Carbon Capture and Storage projects.

### Using travel points to purchase Sustainable Aviation Fuel

To reduce our Scope 3 carbon footprint, Colt has successfully mitigated 5,070 kg of CO<sub>2</sub> emissions through the purchase of sustainable aviation fuel (SAF) from Lufthansa.

This achievement was made possible through the company's travel benefit points program, where employees earn points for every flight taken with Lufthansa or its partners. These points can then be used to purchase flight tickets or convert into SAF.

Colt has opted to convert its points into SAF, resulting in a tangible reduction in greenhouse gas emissions. Colt will receive an "Emission Mitigation certificate," recognising its contribution to sustainability and environmental protection.

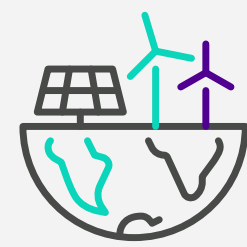
More information about our calculation methodology and our Scope 1, 2 and 3 emissions can be found in the Appendix ['Greenhouse gases calculation methodology'](#) and in ['Global Reporting Initiative \(GRI\) Content Index'](#).

## 6.4. Reducing emissions through renewable energy procurement and energy efficiency

### 6.4.1. Procuring and generating renewable energy

In 2022, the Group's share of renewable energy power in the electricity purchased category has reduced from 80% in 2021 to 74% in 2022. This has led to an increase in our Scope 2 (market-based) emissions by 2% compared with last year. In 2023, we will work to procure renewable energy power in Japan.

The percentage of Scope 2 electricity and renewable electricity consumption has decreased in 2022. This is due to the sale of a number of data centres in 2021 across Europe.



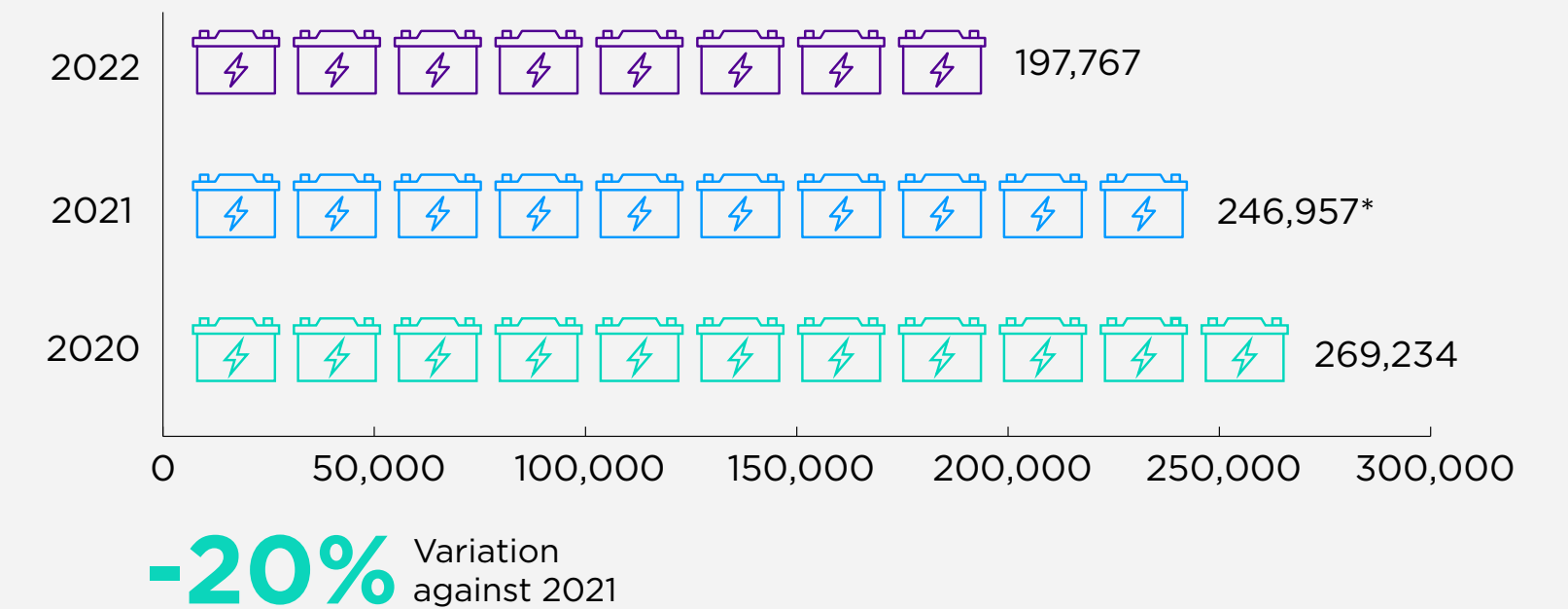
100%

Of the energy we procure at our sites in the UK and Europe is renewable through the use of Guarantees of Origin certificates

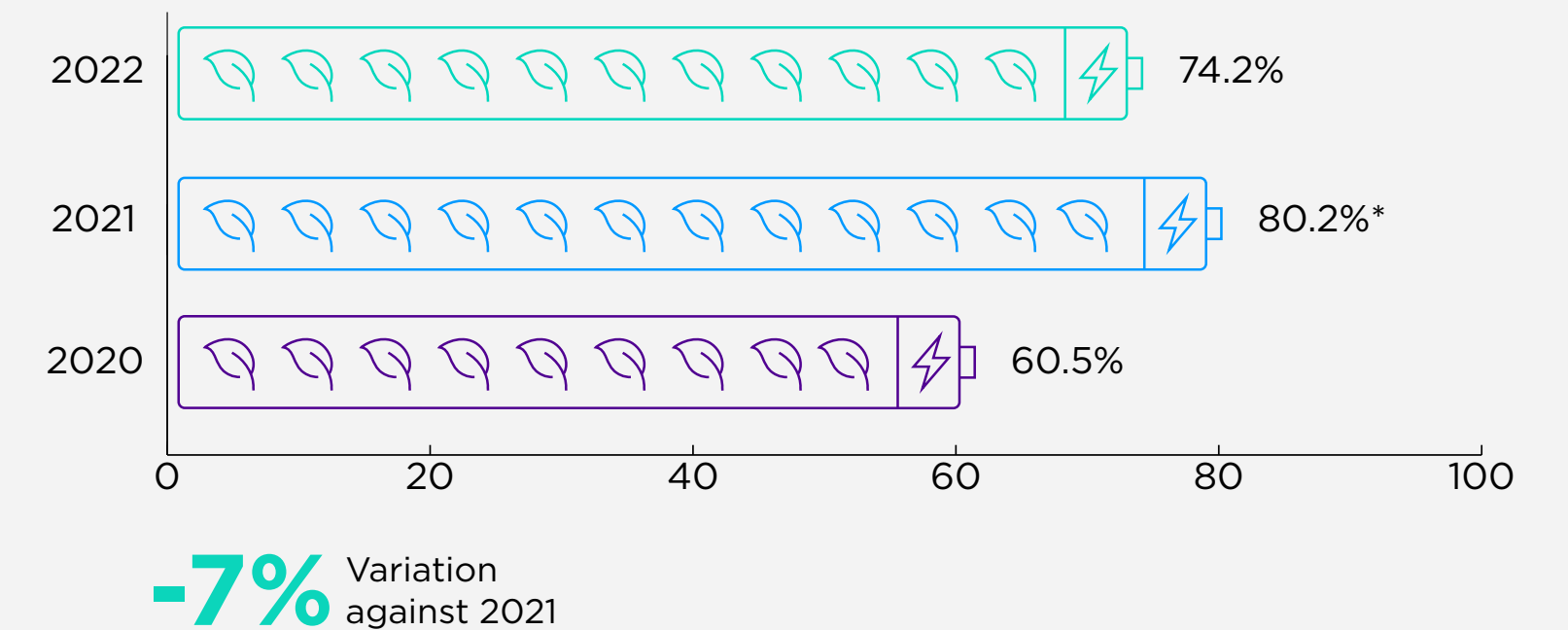
Colt Group is committed to procuring 75% Scope 2 renewable energy power by 2023 and we're on track to procure 100% by 2030 for all sites globally.

Looking ahead, we will explore alternative supply strategies to support our roadmap to reduce our Scope 2 emissions by 90% by 2045, aligned to our long-term Net Zero SBT.

## Total Group electricity consumption - Scope 2 (MWh)



## % Renewable electricity consumption



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

Colt Group electricity consumption by country	2022	Variation against 2021
Japan	23%	4%
Germany	21%	-15%
United Kingdom	22%	4%
Spain	4%	-71%
France	15%	-6%
Italy	3%	-58%
India	2%	9%
Rest of Colt Group*	9%	-46%

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

### New Hyperscale data centre in Mumbai, India

Colt DCS is due to complete Phase 1 of this development by H1 2023. It is one of the largest data centres in our current portfolio with a 120 MW IT capacity, located in Navi Mumbai. Our commitment to reduce emissions is reflected in the design and development. We are proud to use our Navi Mumbai data centre campus with 100% round-the-clock renewable energy. Additionally, the campus is about to obtain Green Building Pre Certification from IGBC.

Read more about the Mumbai data centre on our [website](#)



### Solar energy in the Netherlands

As part of our net zero journey, Colt DCS is switching to 100% renewable energy power by 2030. As well as purchasing renewable power, we are also generating some of our own supplies on-site.

In December 2022, we completed a solar park in the Netherlands which consists of 114 panels and generates 42.7 kW at peak capacity. This will cover the energy needs of our entire office block and ‘meet-me rooms,’ which are secure rooms where businesses can connect to carriers.

Looking ahead, we are planning to install EV charging points on-site to support at least 10 vehicles for our staff and customers to encourage sustainable travel behaviour. Read more about our solar park on our [website](#).





### Solar panels installation in Sibiu

In June 2022, we installed solar panels at our Colt site in Sibiu, with the goal of producing 25,475.7kwh of electricity annually. The electricity generated is used to power the building and any excess energy will be sold back to the utility supplier.

The installation of solar panels reduces the building's carbon footprint. Since their installation, we have produced 12.68 MWh of solar energy, of which we have consumed 9.39 MWh, and 3.29 MWh has been fed back into the grid.

### 6.4.2. Greening our vehicles

In 2022, 17% of Colt Group vehicle fleet were electric compared to 13% in 2021. In 2022, we ordered new electric (BEV) and Plug-in Hybrid (PHEV) vehicles to be delivered in 2023 and early 2024, which will allow us to reach up to 27% BEV and 38% PHEV.

In some countries the public infrastructure for fully electric vehicles is not yet developed enough to cover our needs. In those cases, we provide PHEV vehicles to reduce our fleet emissions.

We have continued to expand the number of EV charging points at our sites. Colt installed charging points at ten locations including offices and nodes across Austria, Denmark, France, Germany, Sweden, Switzerland, the UK and Spain, and also provided home charging stations for employees that were eligible for a job allocated electric car

Colt DCS have electric vehicle (EV) charging points installed at five data centres across four countries.

In total we have installed 36 charging stations with a total of 51 charging ports across Colt Group operations, and plan to install a further 14 charging stations in our data centres in 2023 and

a further 20 at Colt sites in 2023 and 2024. By electrifying our vehicle fleet and installing EV charging points, we aim to support sustainable transport and reduce our emissions. Looking ahead, we will continue to assess strategies to improve the infrastructure needed for our operations.

### 6.4.3. Investing in energy efficiency

As part of our efforts to reduce our global emissions, we ensure that all our network solutions and data centres meet energy efficiency requirements. In line with our Global Reference Design guidelines for the build and operation of Colt DCS's data centres, we use efficient cooling systems and LED lightning with motion detection to minimise energy consumption.

Additionally, we use certifications and management systems to improve our environmental performance. In 2022, we aligned our data centre in France to the ISO 50001 (Energy Management System) standard. Looking ahead, we will continue to explore opportunities to further expand certifications across our sites.

### Saving energy through lighting control in our Data Centres

While lighting makes a relatively small contribution to a data centre's energy load, it is a key element in improving our Power Usage Effectiveness (PUE). In 2022, Colt DCS collaborated with one of our major customers to upgrade the lighting control system to high-efficiency LED lighting with motion-detecting sensors, while maintaining the required lux levels for security cameras to ensure visibility. As a result, we estimate we were able to reduce our emissions from lighting by 49%.

Colts long-term strategy is to create lean, green and modular digital infrastructure where network optimisation is instilled as a continuous discipline.

### Energy efficiency through SDH end-of-life programmes

We are continuing our Synchronous Digital Hierarchy (SDH) end-of-life programme aimed at removing all the infrastructure connected to SDH transport technology.

The overall SDH infrastructure will be removed from the Colt network, resulting in a reduction of power requirements that reduce the risk with being heavily dependent on energy.

Smaller equipment can still satisfy customer requirements while reducing space and energy consumption.

We look forward to reporting more on this important programme in our 2024 Sustainability Report

### Industry-first deployment of 800G technology in the L-band

In 2022 we deployed 800G technology in the L-band across our terrestrial network, making us the first provider to offer 100G/400G wave services using industry-leading coherent technology across both C+L bands.

This breakthrough technology enables double the data transport capacity offered by a single fibre pair, and we are excited to be transforming our optical network to deliver the next generation of high bandwidth services over a fully programmable on-demand optical network, while maximising the efficiency of our fibre assets.

## 6.5. Nature and biodiversity

We realise that our networks, data centres and buildings have an impact on the natural environment, which is why we are committed to minimising the impacts on biodiversity, running an active programme to beautify the sites where we operate our data centres.

At Colt DCS, we consider the impact on biodiversity and ecology at the design stage of new projects, and we are committed to assessing all biodiversity-related impacts on our operations in the next two years. Looking ahead, we're planning to develop a company-wide biodiversity and nature strategy in 2023, which will include design principles for our future data centres.

### The Green Project across Colt DCS's data centres

We are driving progress on biodiversity through our global network of Sustainability Champions across our offices and data centres. This year, we invested in several initiatives to create green spaces in and around our data centres to attract more wildlife and improve the wellbeing of our colleagues.



### Colt House Honey and bug hotel

Colt House in London now has its very own beehive and several Colt Bee Keepers trained to care for it. This project has been led entirely by employee volunteers.

Our bees are an important part of our sustainability commitment, contributing significantly to agriculture and food production and helping wild plants thrive. Additionally, beekeeping provides numerous health and wellbeing benefits, including stress relief, education and skill development.

The UK Green Team has also installed a bug hotel on our rooftop terrace and planted local plants to attract insects, bees and butterflies.

We are excited to have our own Colt honey next spring and are thrilled to see how our insect projects can improve the biodiversity around Colt House.



## 6.6. Circular economy, waste and water

We are committed to sound environmental practices in the way we operate. We embrace circular economy principles to how we design, deliver and manage our products and services. This applies equally to our own operations where we aim to reduce legacy equipment and install more energy efficient kit.

In 2022, Colt DCS developed and launched a Zero Waste to Landfill Policy, which outlines the guidelines on how to manage the waste generated by our activities.

The Policy will be implemented in 2023 across our global operations and includes requirements for our employees, contractors and supply chain partners.

### Zero waste to landfill at our data centres

At Colt DCS, we follow the guidelines of the TRUE zero waste to landfill certification to become more resource efficient and we currently have 3 Colt DCS sites on the road to full certification.

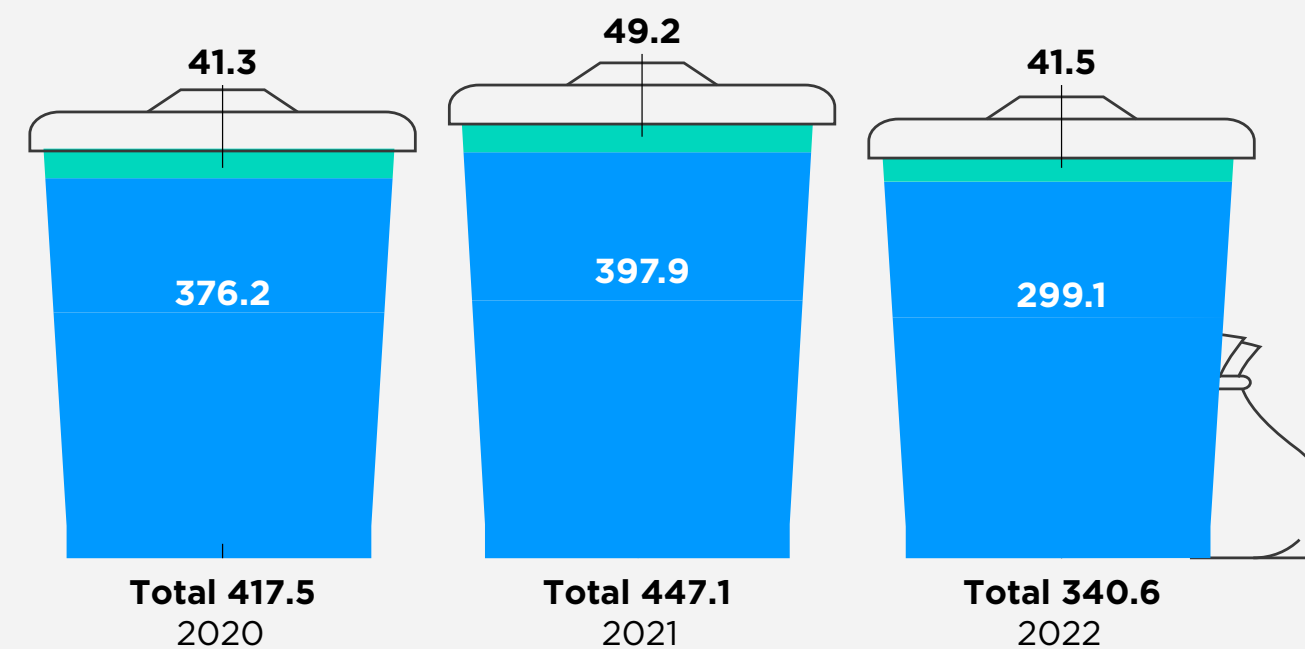
To reach zero waste to landfill, we aim to go beyond waste diversion as we are working through our design, development and operational stages to reduce waste generation. In 2022, the diversion rate at our London North data centre was on average 85%. At our Paris South West data centre, the average diversion rate was 39%.

We're working closely with our suppliers, general contractors and customers to measure and reduce waste. We also explore partnerships to address hard to recycle materials, such as air filters. In 2023, we're expanding the programme to three additional data centre sites.

### Zero waste to landfill at Colt house

Colt has made significant strides in its zero waste efforts since the project's inception. We have increased our waste diversion rate from 55% to 71% and completed a Zero Waste Action Plan for Colt House, which is now being implemented. We have switched to 100% recyclable paper on-site and eliminated single-use plastics in all kitchenettes. Additionally, Colt has updated the Waste Policy to develop a culture of sustainable business behaviour and will implement it across our entire portfolio. These improvements demonstrate our commitment to sustainability and reducing waste across all our operations.

### Colt Group waste (tonnes)



- Colt Group Non-hazardous waste generated (tonnes) **-25%** Variation against 2021
- Colt Group hazardous waste generated (tonnes)\*\* **-16%** Variation against 2021



**-24%**  
Colt Group total waste generated  
Variation against 2021

### 2022 Colt Group total waste generated (tonnes)



**Waste to energy\*\*\*** **-34%**  
139.4  
Variation against 2021



**Waste to landfill** **128%**  
20.8  
Variation against 2021



**Waste recycled\*\*\*\*** **-20%**  
180.4  
Variation against 2021

\*In 2020 and 2021, the total amount of waste generated includes all waste categories in Colt Group's UK and European offices and sites (except in Romania, Ireland and Poland because data was not available) and all data centres. We are also including end of life equipment recycled by our investment recovery partners. Due to different waste categorisation methods, Asian waste data was not included, however the total amount of waste in those countries was around 20 tonnes in 2021. US data is also not included because data was not available.

In 2022, waste data included the majority of Colt Group offices and sites worldwide. For those sites with no waste data available this has been estimated following GHG protocol best practices. We are also including end of life equipment recycled by one of Colt's major investment recovery partners from June to December. At Colt, we have expanded this programme in order to onboard more partners and to centralize the collection of the Waste from Electrical and Electronic Equipment (WEEE) waste data. Next year we expect to increase the coverage of WEEE waste data available.

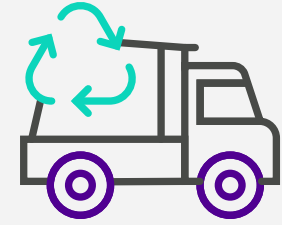
We will keep working on the standardisation and collection of all waste data across Colt Group.

\*\* Hazardous waste includes: Batteries, Fluorescents, Waste from WEEE, Metal and Cables

\*\*\* Waste to Energy includes 1.59 tonnes combusted but not necessarily used to generate energy.

\*\*\*\* Waste recycled includes composting

In 2022, Colt Group achieved a 24% decrease in the total waste generated.



**Zero waste to landfill:** we aim to achieve a 90% diversion rate of operational waste at all data centres and office buildings

**Eliminating single-use plastics:** we aim to put in place a waste reduction strategy for each site during 2023. We have initiated the removal of single-use plastics across our offices globally



**Keeping our used equipment in the loop:** we have expanded the Investment Recovery (IR) programme where we redeploy, resell or recycle redundant equipment and onboarded more IR partners

### Investing in Investment Recovery (IR)

In 2022, Colt decided to change the IR model from a central model to a regional and country model. Rather than working with partners who need to travel long distances across borders to deliver equipment to regional or even continental hubs, we focused on building relationships with local suppliers across our key locations.

To deliver on the new IR model, a new RfP with specific tender questions on geographical locations of processing and storage units and environmental issues was released in 2021. This concluded in 2022, with new and existing partners briefed on the new model and rationale.

### Promoting circular economy principles

We partnered with Circularity First in a teardown project to understand the embedded carbon of our products and gain data for carbon emissions comparisons between refurbished and new equipment.

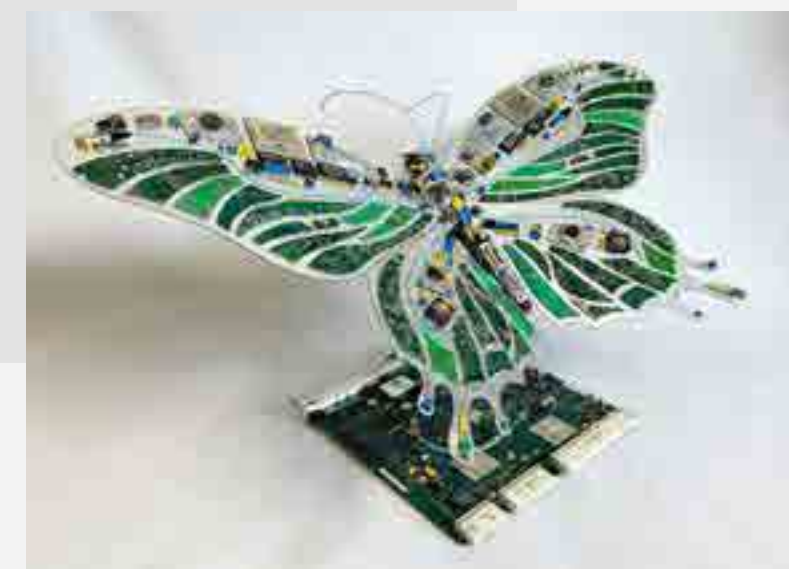
The findings showed that using remanufactured technology is considerably less carbon-intensive than new. For Colt over a period of 5 years this meant avoiding:

- 22.6 tonnes of e-waste and materials being dug up and refined due to remanufactured equipment kept in use
- 1,012 tCO<sub>2e</sub> saved by choosing refurbished over new and the negative impact on biodiversity and communities

These results demonstrate the value of using refurbished equipment by the industry and support Colt's strategy of continuing to purchase equipment through non-new supply chains whenever possible.

### A second life as art

We have taken a creative approach to reducing e-waste by partnering with London-based artist Zak Miskry to transform some of our old network equipment into a butterfly sculpture. The sculpture is on display at our London Head Office, showcasing that electronics can still be useful even after reaching their "end of life" phase. This sustainable initiative not only promotes the importance of reducing e-waste but also encourages innovative thinking to find alternative solutions for electronic waste disposal.



**14,739**  
Pieces of second-hand equipment bought in 2021 and 2022



**75,452**  
Pieces of equipment reused in 2021 and 2022

We make a concerted effort to ensure that waste is prevented and wherever possible, reused or recycled.

### 6.6.1 Reducing our water consumption

There is a global increase in demand for water due to population growth, economic development and changing consumption patterns. At Colt DCS, we are committed to reduce our water consumption and safeguard sustainable access to quality water resources in the communities where we operate. In line with our Global Reference Design document, all new data centres will be designed with a rainwater harvesting system and a water retention and irrigation system.

# Trusted employer and Neighbour



# 7. Trusted employer and neighbour



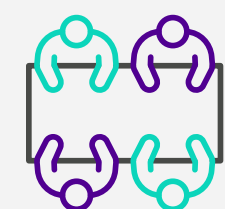
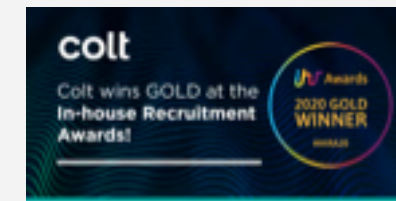
## 7.1. Our employees

The engagement of our amazing people and driving the employee experience are core elements to support Colt's Strategy. Understanding employee insights is essential to being able to improve their experience and engagement.

We encourage a listening and learning culture to drive connection and innovation within our teams. We have a listening strategy that uses Colt people surveys and feedback to understand and shape the Colt people priorities. We have introduced a Flexible First policy that provides employees greater flexibility on where they work, and also have in place Caregiver leave benefits: both examples of how we've listened and taken action on employee feedback to improve their working experience. We plan to continue and build the listening strategy in 2023, trialling new ways to enable employees to share feedback with us.

We value diversity in how we work and support each other. We want our people to develop fulfilling careers, achieve their full potential and have sense of inclusion and belonging.

## We're an award-winning employer



5,461\*  
Employees globally



94.6%\*  
Of our employees are permanent



30.5%\*  
Of Colt Group employees are female

\*Headcount as of 31/12/2022

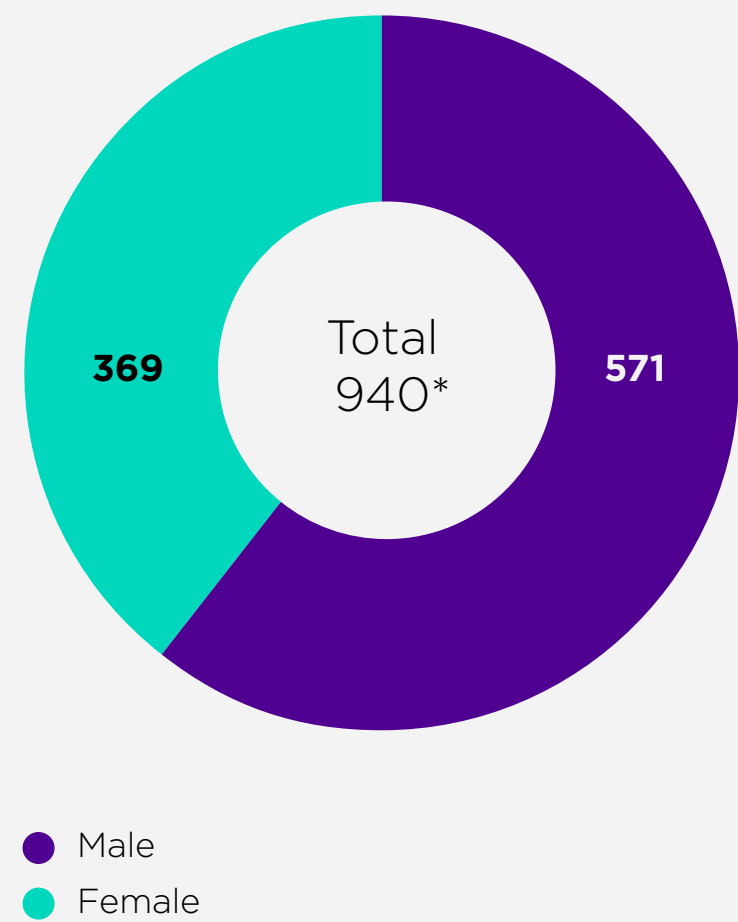
	Colt Group Total employees	% Female	Change in number of females (variation against 2021)
France	287	30.7%	10.0%
Germany	445	24.5%	-0.9%
India	1,928	24.6%	1.1%
Italy	129	24.0%	0%
Japan	352	23.6%	10.7%
Spain	592	39.5%	4.0%
United Kingdom	846	29.2%	3.8%
Rest of Colt Group*	882	45.4%	5.8%
<b>Total</b>	<b>5,461</b>	<b>30.5%</b>	<b>3.7%</b>

\*Rest of Colt Group includes the countries: Austria, Belgium, China, Denmark, Hong Kong, Ireland, Luxembourg, Netherlands, Portugal, Romania, Singapore Sweden, Switzerland, South Korea, Poland & US. Headcount as of 31/12/2022

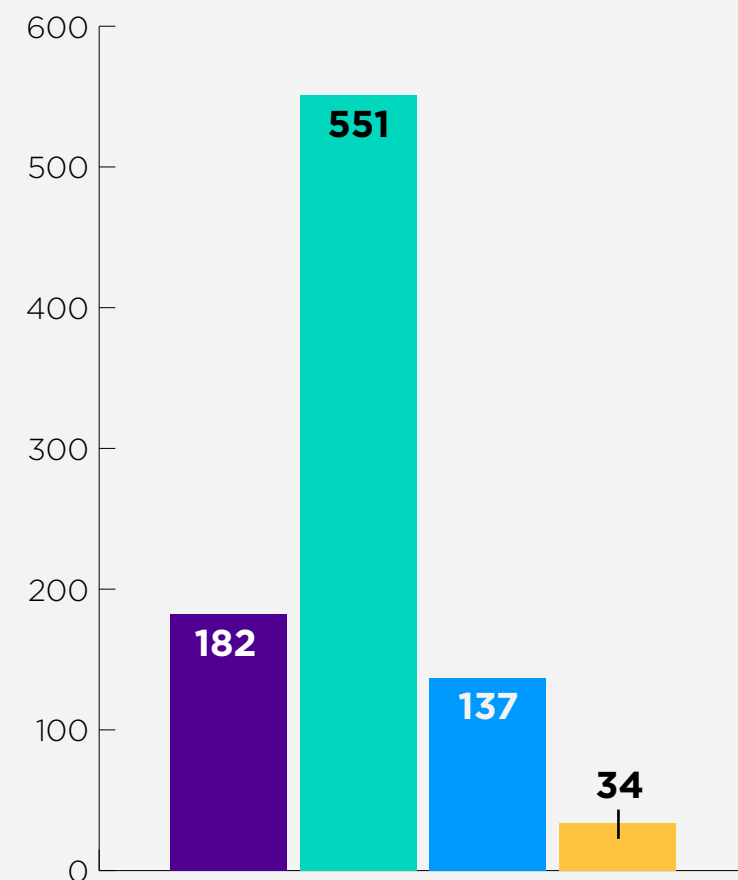
Employee data in this section refers to the following definition: number of people employed by Colt Group, regardless of employment type (Employee, Apprentice, Graduate Rotational, Intern, Contractor Ongoing, Contract Trainee, Fixed Term Employee); excluding temporary Professional Service Providers. active and inactive employees are included



### Colt Group new hires



\*Number of new hires as of 31/12/2022



- Gen Z (born after 1994)
- Gen Y (born between 1980-1994)
- Gen X (Born between 1965 - 1979)
- Baby Boomers (Born before 1965)

According to Data Protection Regulation, the above figures are the only ones that can be disclosed

### Flexible First

2022 saw the launch of Flexible First, part of our commitment to flexible ways of working. The programme has been developed in consultation with employees and tested through a hybrid working pilot, which demonstrated that flexibility, trust, and empowerment are crucial to the success of the company.

Flexible First provides Colt Group employees with the freedom to choose where they work, striking a balance between office and remote working. It is informed by leading research and is a progressive, forward-thinking approach to post-pandemic working.

The Global Flexible First Policy provides guidance to make Flexible First part of our culture and employee experience for existing and new joiners, as well as enabling connecting with purpose.

Additionally, in early 2023 Colt Group introduced Connection Days, which encourage in-person connection opportunities twice a month, demonstrating the company's commitment to promoting both remote and in-person work environments. Connection+ events were also introduced that not only enable people to connect, but to also take part in facilitated learning sessions.

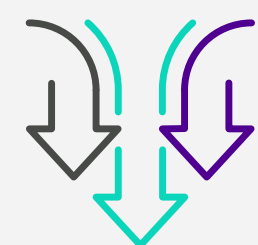
### People Matters Survey

Our commitment to employee engagement and sustainability at Colt Group is exemplified by our annual survey, "People Matters." This survey plays a crucial role in our listening strategy, offering valuable insights into the experiences and engagement levels of our employees.

The survey measures seven key areas: Career and Development, Efficiency, Strategy and Leadership, Sustainable Engagement, Management, Wellbeing and Values. In 2022, we achieved a strong response rate of 84% (Colt) and 78% (Colt DCS), demonstrating a high level of engagement from our employees. The results of the annual employee survey are communicated to the entire company by Colt Group's CEO, executives and senior management.

Colt results showed consistent positive areas in comparison to the previous year, with a notable improvement in Wellbeing and Management and a favourable score in the area of Colt's values guiding day-to-day work as a result of our continuous efforts. We will continually ask for and improve upon employee feedback, develop the management population, prioritise wellbeing, simplify and automate the systems they use and provide opportunities for learning and development.

These results reflect our dedication to employee wellbeing, career development and a sustainable work environment.



**9.6%**  
Reduction in Colt Group turnover rate for Gen Z since 2021

## 7.2. Diversity, Equity and Inclusion

In 2022, we reviewed and refreshed our Diversity, Equity and Inclusion (DEI) strategy. Our goal is to build an innovative, great and inclusive place to work.

We will achieve this through our four DEI pillars:

- **Leadership and governance.** Ensure we have the governance in place to deliver on our inclusion goals and develop our leaders as inclusive role models.
- **Inclusive culture.** Drive an inclusive culture where we can harness diversity of thought for greater success.
- **Diverse representation.** Improve the diversity of our workplace and ensure we represent the communities that we serve, considering all diversity dimensions both visible and invisible.
- **Equitable business practices.** Employ equitable business practices that improve the employee experience and affect positive change in the wider world.

We run an extensive and active DEI programme with activities across each pillar.

At Colt we refreshed our gender action plan in 2022, to increase our focus on creating a more gender balanced organisation. A key part of this plan has been the delivery of our Inclusive Recruitment programme aimed at mitigating bias within the hiring process and upskilling managers to be able to run a more inclusive hiring process. Another element of the plan has been to ensure that women can thrive at Colt and we have collaborated with our Women+ network to continue to deliver engaging programmes and learning interventions, such as our group mentoring initiative.



Women+@Colt our women's and allies network exists to promote diversity and gender balance at Colt and engage with all employees to enable women to thrive



Pride Matters is our LGBTQ+ Allies network, aiming to make us a more inclusive place for all. Formed in 2019, the team has grown globally and has helped drive the message that we are inclusive, no matter how you identify



YOUnited network exists to promote cross-cultural understanding and an environment where everyone can flourish regardless of their race, ethnicity, faith or cultural background



Disability Accessibility Network (DAN) an employee network established with the aim to raise awareness of visible and invisible disabilities and health conditions, embrace people's differences and champion inclusion across Colt



Next@Colt is our newest employee network which focuses on the needs and aspirations of those who are early in career

### Inclusive Recruitment Programme

At Colt we are embedding inclusion into our recruitment process to achieve our gender targets and support our diversity, equity & inclusion goals. We identified three key objectives for driving inclusive recruitment in 2022 and set up a number of related workstreams, including developing an objective and consistent hiring process, upskilling managers on the recruitment process and mitigating bias, and developing an attraction strategy for diverse talent. This programme emphasises the importance of hiring manager upskilling to implement competency-based interviewing and ensure managers understand the Colt approach to recruitment.

### Conscious Inclusion e-learning and Actioning Inclusion Campaign

Our conscious inclusion e-learning programme was launched to engage employees on how to role model inclusive behaviours. Taking an awareness of unconscious bias a step further, the course explores what actions our people can take to be actively and consciously inclusive. Part of our mandatory training cycle, the programme has been developed to bring inclusion to life. To build on this learning, we launched an internal engagement campaign called Actioning Inclusion focused on using storytelling to share best practice examples of inclusive behaviours and allyship. The campaign provided practical tools and resources to employees to support their inclusion journey, with a further focus on how people managers could create inclusive teams.

To find out more about our network initiatives: [www.colt.net/about/inclusion-diversity](http://www.colt.net/about/inclusion-diversity)

### Supporting LGBTQ+ Communities

Colt developed long-term partnerships with two LGBTQ+ organisations in the UK, MicroRainbow and Stonewall Housing, to provide free voice services and interactive voice recognition. In the case of MicroRainbow, it allowed for the launch of the first dedicated phonenumber for LGBTQ+ refugees leaving Afghanistan.

In Japan, we started regular 'Pride Cafes' where the local Pride Matters employee network invites employees from our offices in Asia to join and learn about issues that impact LGBTQ+ people in the workplace and beyond.

In India, the local employee networks have collaborated on an initiative for supporting women entrepreneurs including persons with disabilities and members of the LGBTQ+ community. So far we have supported over 200 entrepreneurs.

### A Stonewall Top Global Employer

Colt has been recognised as a Stonewall Top Global Employer for 2022 in the UK, joining a select group of 26 organisations. We were awarded Bronze in the global accreditation process. As a company, we firmly believe in creating an inclusive workplace for all and we have taken significant steps towards achieving this. We have provided LGBTQ+ inclusion training, hosted webinars and supported LGBTQ+ organisations through charity work. We are committed to continuing our efforts to promote LGBTQ+ inclusion in the workplace and will use this recognition as motivation to do even more in future.

A key focus has been to fully understand how accessible our business is for people with disabilities. At Colt we have been working with a third party to determine accessibility levels across ten different areas from built environment to procurement and employee experience.

This work has formed the basis of Colt's 5-year accessibility roadmap. It will continue into 2023 and beyond as we seek to raise awareness of the needs of people with disabilities and remove barriers to success.

We launched Accessible Spaces, which is a forum for our Workplace Services to consult with Colt's Disability Accessibility Network (DAN) on our built environment. Another initiative saw DAN work with an external provider to provide sign language classes to our employees.

### TM Forum Inclusion Diversity Score (IDS)

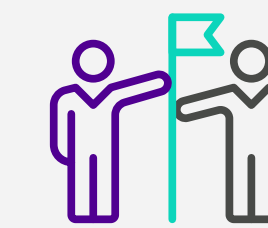
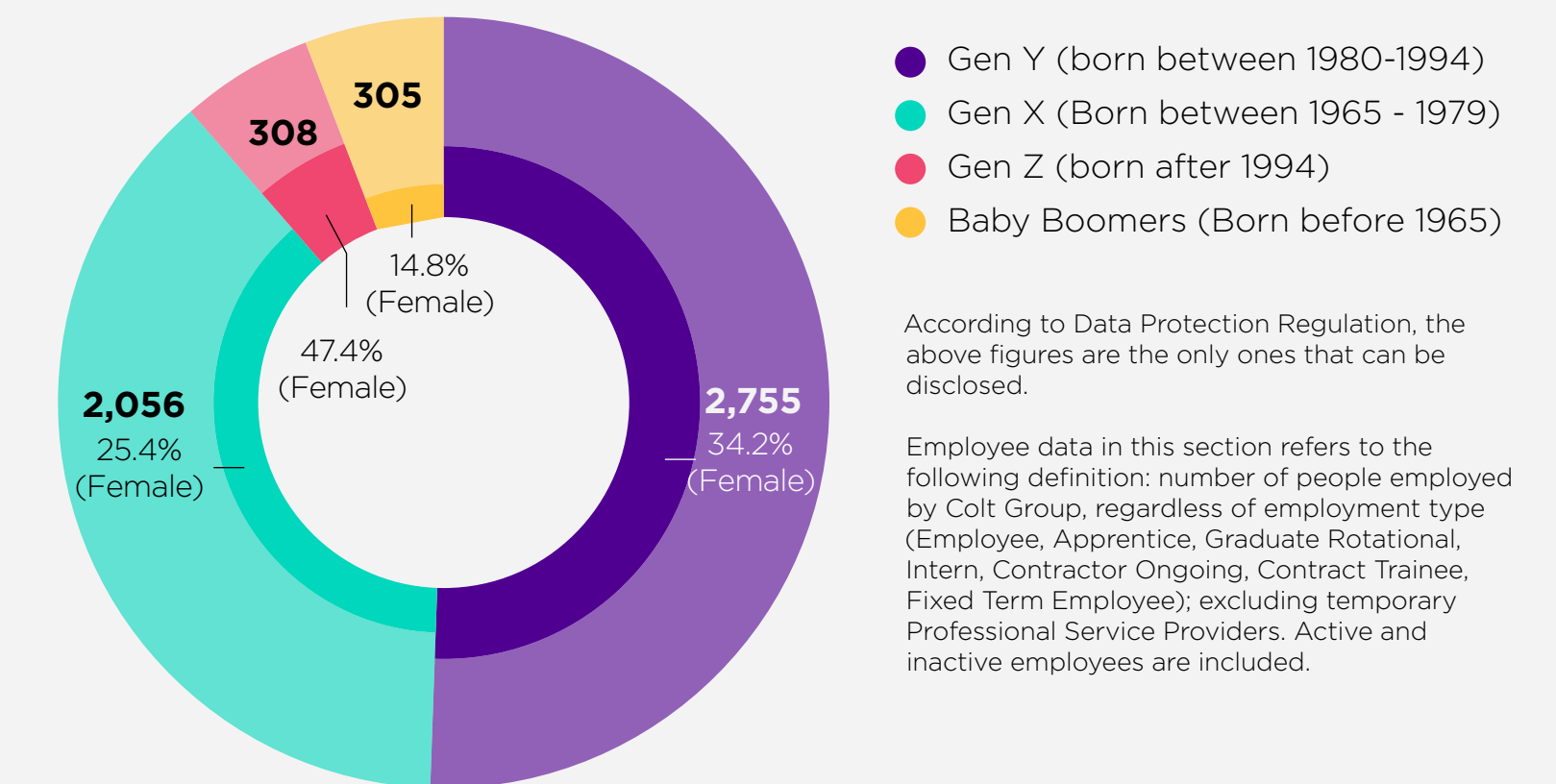
We worked with TM Forum to launch the industry's first Inclusion and Diversity measure - the TM Forum IDS - launched in Copenhagen in September. Colt's CEO, Keri Gilder, personally led our participation in this initiative as part of her work as chair of TM Forum's Diversity & Inclusion Council.

### Storytelling for black history and innovation

We ran a series of activities around race and cultural awareness. Black History Month saw us partner with other organisations for a panel discussion to share experiences and understand where we are now, as we strive for racial equity. We organised sessions on storytelling and black history and innovation, and we promoted our anti-racism toolkit developed by our YOUined network.

In 2022, Colt strengthened the approach to supporting senior workers and those who may be thinking about retirement. We focused on those ten years away from retirement, placing the emphasis on general wellbeing to support people with transition and change. We are also aware that not everyone wants to go down a traditional retirement route and more and more people may want to continue to work part time or semi-retired, while others may want to pivot and change direction later in their career. As such, we launched Transitioning to Retirement seminars this year in the UK and Germany, locations with a high number of senior workers.

### 2022 Colt Group employees by age\*



83.3%\*

Of Colt Group Gen Z managers and consultants are female

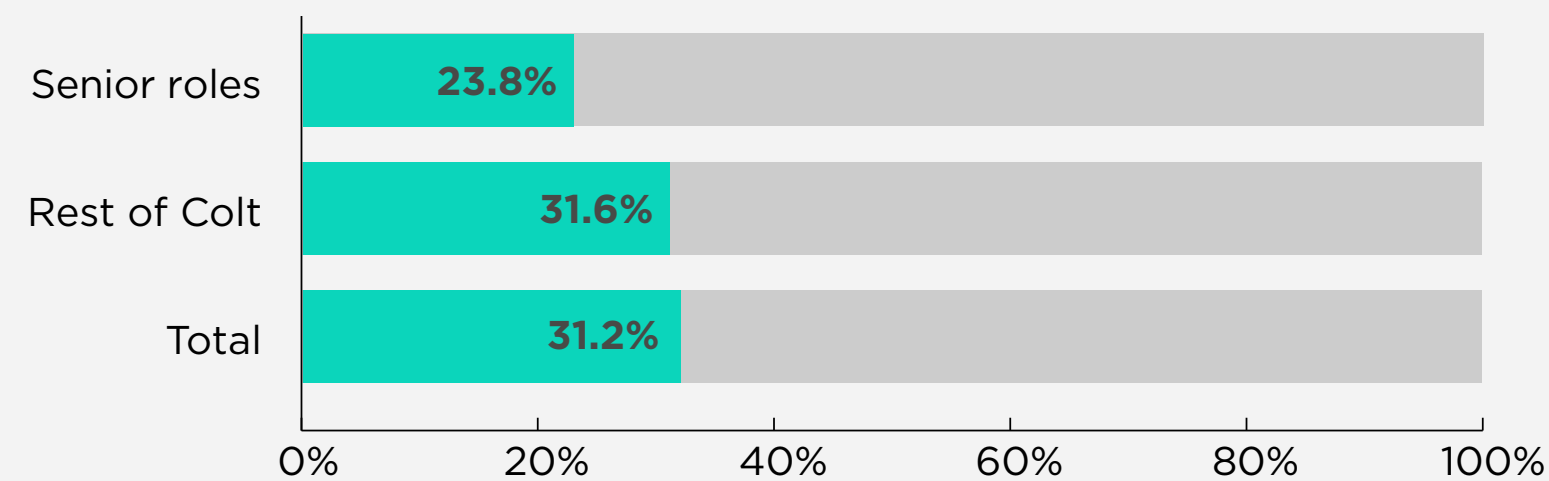
\*Percentage as of 31/12/2022



3.6%

Increase in percentage of females in senior roles at Colt Group compared to 2021

### 2022 Colt female percentage by job levels



\*Figures do not include Colt DCS employees  
\*Percentage as of 31/12/2022

We are passionate about working with suppliers who share our diversity, equity and inclusion goals. This is why we ask our supply chain about their inclusion and diversity programmes when we onboard them. We regularly share best practice with key suppliers and run collaborative initiatives to strengthen our approach. We are extremely proud of our volunteer employee networks that help us strengthen diversity, equity and inclusion.

### Accreditations and memberships



### 7.3. Learning and development

We strive to attract and retain a high-performing and diverse workforce to deliver our strategic agenda and help customers meet their sustainability targets. A key part of this is investing in the training and development of our people.

As part of our commitment to career development, we have invested in a range of learning tools for employees to develop holistic workplace skills, alongside specific knowledge relevant to their chosen career path.

Our learning and development offering includes a mix of internal and external training courses and access to training resources. We have our own internal technical training team who produce in-house instructor-led technical training. We also support employees to attend external training courses led by specialist instructors and by providing access to LinkedIn Learning licences and other external platforms.

Historically at Colt Group, we have consistently seen very strong completion rates for our compliance training. In 2022, the emphasis of learning and development at Colt has expanded well beyond compliance training to include more advanced skill-based, behavioural and performance-driven learning and development, in line with our ambition to drive a learning culture across the company.

In 2022, we made two key appointments to our Global Talent team. We appointed a Head of Leadership and Management Development, whose remit is to elevate leadership development across the company, focusing on embedding six key leadership behaviours. We launched leadership development training for our Executive and Senior Leadership teams in 2022 and this is planned to continue in 2023. We also plan to deliver a global management development programme for all Colt managers in 2023 to drive the same leadership behaviours across the management team.

We also appointed a new Early Careers Manager, focused on attracting, developing and retaining Early Careers talent across the organisation: a key focus area for us. Learning and development for our early-in-career talent is something we are passionate about and all our early careers cohort will complete both global and functionally specific learning and development activities.

### Embrace Your Best development program

The Embrace Your Best program is Colt Group's follow-up to Best Brave Self, a previous development initiative focused on empowering women. Delivered in collaboration with Colt's Women+ employee network, Embrace your Best aims to create a community of women across the business supporting each other whilst participating in an engaging personal development programme.

First launched in 2021, high demand led to us run the programme again in 2022. Over 250 colleagues signed up to attend the inspiring, engaging sessions.

We continue working with our external and internal networks and collaborating across the business to ensure we find ways to progress women and retain great talent.

### Stepping into leadership

Colt has created the Stepping into Leadership course to develop new managers with the skills needed to be successful. The programme explores leading management practices and current and future ways of working. Our approach to inclusive people management practices is built into the learning experience. As of December 2022, 178 colleagues have participated in this training with a further four to five additional cohorts planned in 2023.

Mandatory training completion rate	Colt Group Employees	Colt Group employees - New joiners**
<b>Business Continuity</b>	98.2%	89.5%
<b>Conscious inclusion</b>	98.5%	91.6%
<b>Prevention of Sexual Harassment in Workplace (PoSh) (India only)</b>	98.4%	90.7%
<b>Security Awareness</b>	97.7%	90.9%
<b>Code of Conduct</b>	97.7%	89.4%
<b>Data Protection</b>	98.3%	87.4%
<b>Brand and Vision training (Colt only)</b>	97.0%	84.0%
<b>Health And Safety</b>	Not rolled out in 2022. Only mandatory for new joiners	88.3%

	Number of courses completed	Number of people trained	Number of hours	Average hours of training per employee
<b>Mandatory trainings*</b>	8	5,334	22,749	4.3
<b>LinkedIn Learning</b>	5,685	1,747	7,451	4.3
<b>Hiring best practices and inclusive recruitment (Colt only)</b>	14	278	21	0.1
<b>Stepping into leadership program (Colt only)</b>	45	178	1,330	7.5
<b>Mental health for managers (Colt DCS only)</b>	1	73	274	3.8

### Bringing in new young talent

At Colt Group, we are passionate about developing our Early Careers talent. Across Colt Group, we run active graduate talent programmes to train our newest colleagues.

At Colt, early careers programmes bring in graduate and apprentice talent into a number of departments including, HR, Finance, Marketing, Sales, Sales Engineering, Technology and Security and Service Delivery. Through structured learning programmes, on the job training and mentoring support, our young talent build a strong understanding of our business and add value to their teams, our business and our customers. In September 2022, Colt welcomed 10 new Finance Graduates to the UK and Europe and 24 new Graduates in India. More information about the Colt Graduate programme can be found on our [website](#).

Graduates joining the Colt DCS programme will complete a series of rotations across a number of departments. These typically are in Operations, Design, Commercial & Real Estate, and Pre-Sales departments. Rotating between these allows Early Careers colleagues to develop a wider understanding of the business, from operational processes and procedures to the more commercial and strategic objectives. As of 2019, we hired nine Early Careers colleagues through our Graduate Programme. More information about our Graduate Programme can be found on our [website](#).

\*Data includes active and inactive employees and excludes Contractors Ongoing. The completion rate has been calculated based on headcounts as of 03/01/2023  
 Action on Environmental Sustainability Training held in March 2023. Completion rate was 98.7%  
 \*\* New joiners: number of people recruited or re-recruited from external sources during the reporting period including (hire date within reporting period) global transfers, change in person type, backdated and future dated joiners

\*Data includes active and inactive employees and excludes Contractors Ongoing.



1,276\*  
 People given additional technical training

\* Number as of 31/12/2022



€410,612  
 Spent on external training requests for Colt

### 7.4. Employee wellbeing, health and safety

The health and safety of our employees is paramount. We provide a safe and healthy workplace and we continuously strive to improve workplace safety and employee awareness and behaviour.

Our Health and Safety (H&S) Policy Statement sets out our commitments to manage and safeguard the health and safety of our employees, contractors and any others who may be affected by our activities.

We are committed to developing our Occupational Health & Safety Management System in line with ISO 45001:2018. We provide safe and healthy working conditions to prevent work-related accidents, injuries and ill-health.



Lost time injuries\*

\* Incidents involving sick-leave. Number as of 31/12/2022

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

We are proud of our wellbeing programmes to support our employees. We have a Global Mental Health and Wellbeing Policy that provides guidance and advice to all our employees on issues around mental health.

Our approach to mental health aims to build an inclusive and supportive environment. We want people to be able to ask for support and for those around them to be able to recognise early warning signs so that early intervention can take place.

All employees have access to an Employee Assistance Programme (EAP) which provides confidential support, resources and information. The service is a key part of our offering to support personal and work-life.

Colt Group provides benefits to support employees\* and their families. In some countries, employees are eligible for additional benefits such as dental insurance, health assessments, cancer screening and meal vouchers.

Pension	Life Assurance
Company Holiday Entitlement	Disability Insurance
Medical Insurance	Employee Assistance Program (EAP)

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

We supported several employee wellbeing initiatives in 2022

#### Breaking the taboo around menopause

At Colt, a strong focus on menopause awareness continues to ensure that those who experience menopause symptoms are supported in the workplace. We launched our Menopause ReFramed awareness campaign in the lead up to World Menopause Day in October, which included a podcast for women from a diverse range of backgrounds, to share stories and experiences. We trained 21 menopause champions who are now able to guide colleagues experiencing symptoms and signpost to further support.

#### Mental health awareness raising and manager training

Wellbeing and mental health are areas we continue to focus on for our employees. We have continued to raise awareness so our people know how to recognise the signs of someone struggling and how to support someone with mental health concerns.

Colt Group Mental Health First Aiders are employees who have been trained to be the first response for colleagues who need a listening ear or signposting for further support

As of 2022, 73 Colt DCS managers have undergone this training. We also have a dedicated intranet area about mental health and stress awareness. At Colt, we also continued with our mental health first aiders programme.

#### Financial wellbeing webinars

Colt Group has taken proactive steps towards employee wellbeing by offering its employees access to an Employee Assistance Programme (EAP) and financial wellbeing webinars. The EAP covers counselling and legal and financial consultation, accessible 24 hours a day and at no cost to the employee.

Resources are also available to household members, ensuring that the support extends beyond the employee. In addition, Colt Group offers financial wellbeing webinars that help employees understand the psychology behind saving money and adopting good financial habits.

By offering these programs, Colt Group is demonstrating its commitment to the wellbeing of its employees, a key aspect of its sustainability strategy.

### Wellbeing days at Colt DCS

In 2022, Colt DCS offered four wellbeing days to encourage colleagues to take time out to focus on their own wellbeing.

These days are separate from annual leave and sick days. Looking ahead, we will continue to offer these days to encourage employees to do things that contribute to their health and happiness.

### 7.5. Engaging with our communities

We are committed to supporting the local communities where we operate.

We encourage employee engagement with charities and local community initiatives. We value the dual impact of supporting a good cause, and enabling employees to connect with communities outside the office environment.

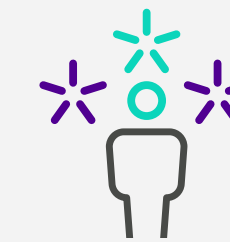
In many geographies, the in-country employee-led CSR committee has selected a local charity partner to support as well as identified CSR initiatives focused on fundraising, volunteering and skills development within the local community.



€427,000\*

Donated by Colt to charities and Disasters Emergency Committee

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



699

days spent on volunteering

€170,000

Donated by employees and match-funded by Colt for our annual fundraising event.

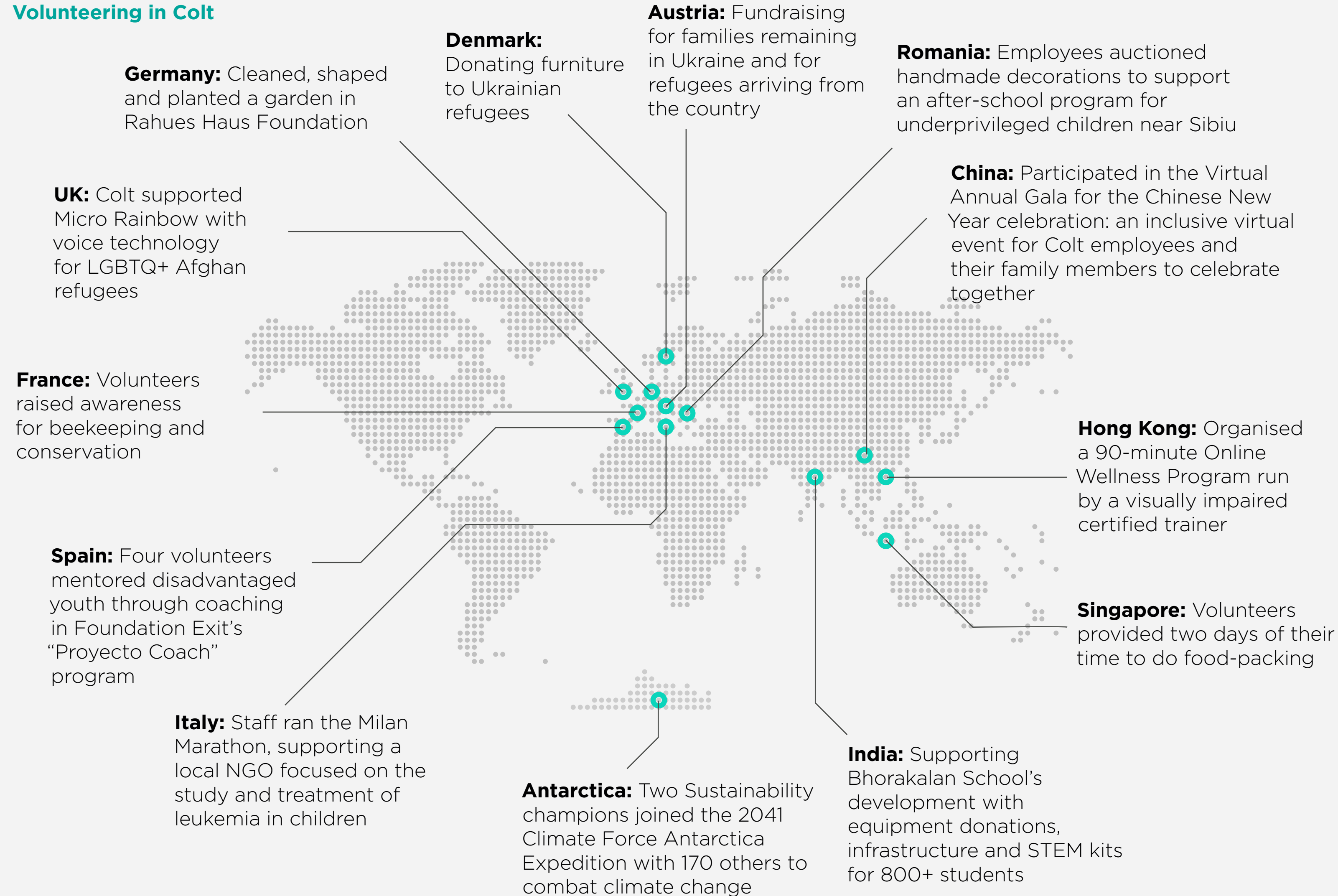
Our recent donation of €170,000 to the Disasters Emergency Committee (DEC) is a testament to Colt's commitment to humanitarian causes.

As a company, we believe in making a positive impact on communities in need, and our contribution will support lifesaving services, emergency housing, and long-term rebuilding efforts for refugees affected by conflicts in Ukraine and floods in Pakistan.

Our global Corporate Social Responsibility (CSR) teams were instrumental in organising a successful charity auction, and we matched employee contributions.

We are proud to support the DEC's mission to provide emergency assistance during times of crisis, and we will continue to contribute to worthy causes in the future.

## Volunteering in Colt



Colt DCS depends on local communities for its workforce, local contractors, service providers and social licence to operate. In all new construction projects, we are committed to supporting and working with our local communities to help them thrive on all fronts.

Our goal is to manage our actions and operations responsibly to minimise negative social and environmental impacts, while maintaining a constructive dialogue with communities.

In 2023, we are planning to formalise our community engagement plans for all new construction projects to maximise positive influence on communities economically, socially and environmentally.



# Responsible business practices and good governance



# 8. Responsible business practices and good governance



## 8.1. Responsible business practices

We are committed to ensuring that our ESG commitments are converted to positive impacts through ambitious targets and dedicated action. Colt Group’s [Code of Business Conduct](#) and policies provide guidelines for our business practices and set out how we operate in an accountable way with consistency across all markets.

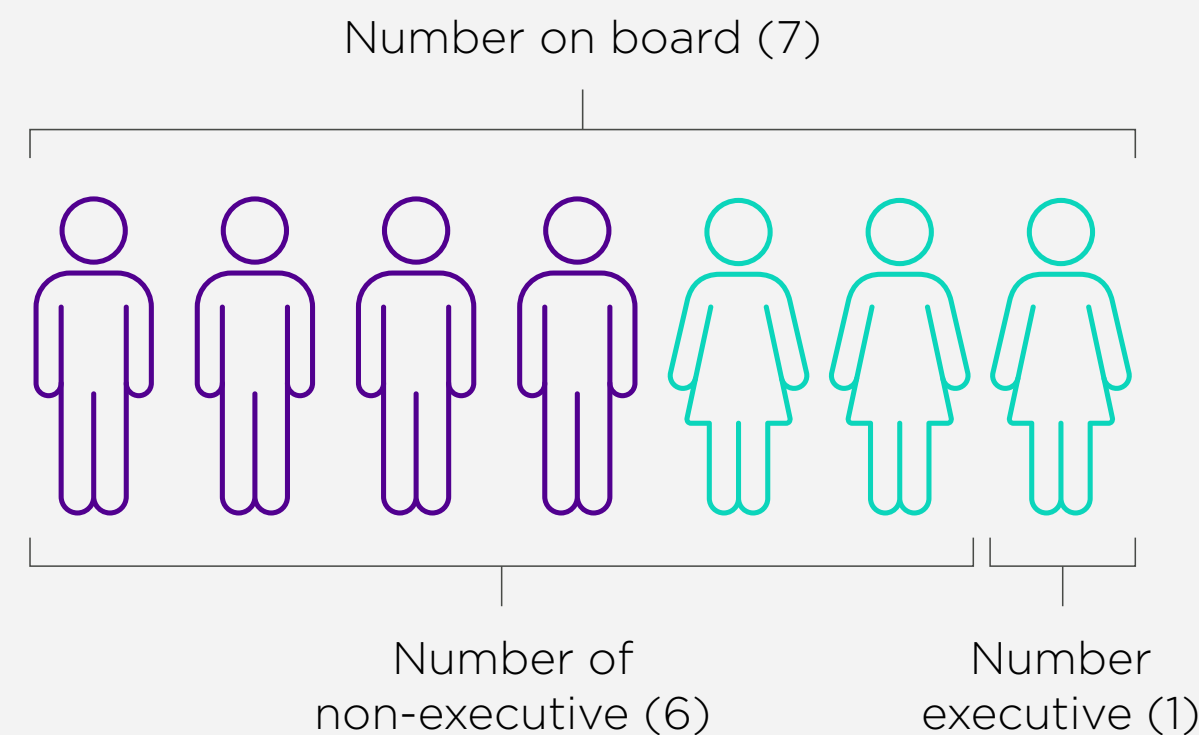
The Sustainability programme is overseen by the Environmental Sustainability Steering Committee (the SteerCo), an executive-level committee co-chaired by the CEOs of Colt and Colt DCS. The SteerCo is responsible for agreeing and approving the global sustainability strategy and policies and for the delivery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

The Colt Board makes decisions affecting Colt and the Colt Group. The Colt DCS Board has a full mandate to make decisions regarding Colt DCS. The Colt Board and Colt DCS Board are each comprised of non-executive directors and senior management. The Audit Committee and the Remuneration Committee do not include executive directors.



The Board of Colt Group Holdings Limited (Colt Board) comprises of seven directors. The Colt Board has three subcommittees: the DCS Subcommittee (named the ‘DCS Board’), the Audit Committee, and the Remuneration Committee.

Our approach to diversity is reflected in the Colt Board’s composition.



## 8.2. Risk management

Managing our risks and opportunities is a key factor in the continued business success of Colt Group. We strongly believe that good risk management creates a more resilient and sustainable business. Colt Group operates an Enterprise Risk Management Framework covering all types of risks, including sustainability risks. The risk management process at Colt Group is based on the ISO 31000 principles and follows a 4-step cycle: identify, assess, respond and monitor.

The impact of potential risks cover quantitative and qualitative measures such as financial exposure, people and safety, business disruption, compliance, customers and reputation. An inability to spot, analyse and mitigate potential risks - whether business or societal - may harm our ability to adapt and grow our business.

Climate risks at Colt Group are integrated into our company-wide risk management process.

### Implementing TCFD

In 2022, Colt Group updated the climate-related risk register which identifies all climate-related risks to our operations including those regarding the transition to a lower-carbon economy, as well as the physical risks of a changing climate. The impact and likelihood of each risk have been assessed over a relevant time horizon in order to give an overall risk rating. The updated assessment features an opportunity register to highlight key climate-related opportunities and help Colt Group identify ways to effectively capitalise on them.

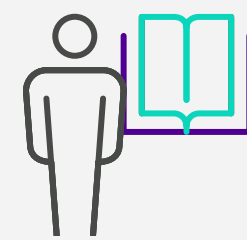
In line with the requirements of the Task Force on Climate-related Financial Disclosures (TCFD), this year we completed our initial climate scenario analysis to better understand the potential impact of climate change and the appropriateness of controls in place to prevent them. The most material risks from our climate change risk register and one key opportunity were considered over three time horizons and across two scenarios, a high carbon business as usual scenario and a low carbon transition scenario. Each risk has been assessed qualitatively across both scenarios at each time horizon and has received a rating in terms of likelihood and impact with justification for each.

Findings from our climate scenario analysis found that due to the sustainability initiatives planned and completed to date, we sit within risk appetite for the current climate risk exposure. Over the medium and long term however, we will need to further develop to mitigate climate-related risks to an acceptable residual level. This includes improving the granularity of sustainability metric reporting to track sustainability performance and continued investment to improve the energy efficiency of our infrastructure.

### 8.3. Business ethics

We run our business responsibly and to the highest ethical principles. It is not our policy to merely comply with the letter of the law, rather it is our policy to instil a true culture of compliance with all laws, rules and regulations wherever we do business.

Each person acting for Colt Group has a responsibility to comply with all standards. They are required to complete mandatory training about the Code of Business Conduct annually.



97.7%

Colt Group Employees completed the Code of Ethics training

\* Data includes active and inactive employees and excludes Contractors Ongoing. The completion rate for new joiners was 89.4%



514

Employees had additional Anti-Bribery and Corruption training\*

Number of as of 31/12/2022

Additional Anti-Bribery and Corruption (ABC) training was assigned to Colt and Colt DCS colleagues which is in addition to the mandatory Code of Business Conduct assigned to all employees and includes ABC guidance. The scope of the employees required to undertake this training is based on their job role and function. These include all Sales employees and pertinent employees engaged in the respective Finance, 'Major Builds', Procurement & Supply Chain.

Employees are encouraged to raise breaches of the Code of Business Conduct through an independent Business Ethics Line or by reporting to the Corporate Compliance Committee. Anonymous whistle blowing is possible wherever permitted by local law.

The Corporate Compliance Committee reports to the Audit Committee about breaches or suspected breaches of the Code. The members of the Colt Board and its subcommittees receive training around their duties when appointed. In addition to reviewing any suspected compliance breaches, the Corporate Compliance Committee initiates a minimum of one activity per month to raise awareness about ethical behaviour.

The Colt Board and its subcommittees are aware of the UK Companies Act 2006 duty to declare a conflict of interest in any matters presented to them. Related Parties transactions are independently assessed as part of the statutory audit.

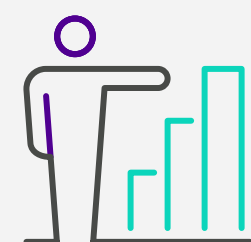
#### 8.4. Human rights and anti-slavery policy

We are committed to running our business responsibly and to respect human rights. We comply with all the International Labour Organisation (ILO) Fundamental Principles.

We have zero tolerance to slavery and human trafficking. The Colt Board annually approves our [Modern Slavery Act statement](#) which is published on our website.

We will not tolerate any such activities within our own operations or within our supply chain and we are committed to taking appropriate steps to ensure that everyone that works for Colt Group benefits from a working environment in which their fundamental rights and freedoms are respected.

Colt Group respects employee's rights to freedom of association and collective bargaining.



63%

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

\* This percentage includes: Employee, Fixed Term Employee and Grads or all employees with active and inactive payroll at Colt Group

#### Anti-Bribery and Corruption Training

Colt Group places a strong emphasis on ethical conduct and compliance with all applicable laws, regulations and business standards.

All employees are required to comply with anti-bribery legislation and avoid any form of corruption. Additional anti-corruption and bribery training is prescribed for certain employees, in addition to the mandatory training on the Code of Business Conduct which includes anti-bribery and corruption guidance.

The training covers various activities and interactions such as customer interactions, supplier selection and management, negotiating contract terms, and engaging with government officials. In 2022, we refreshed the bi-annual training on anti-bribery and corruption to ensure that employees are up-to-date with the latest policies and procedures.

Our employee's collective bargaining agreements cover working conditions and terms of employment between one or more employers or employers' organisations and one or more employees' organisations.

For employees not covered by collective bargaining agreements, working conditions and employment terms are confirmed in the employment contracts, global and local HR policies, country-specific employee handbooks or collective agreements at company level.

Colt Group is committed to establish structures through the organisation to proactively engage trade unions, works councils and employees with a view to create and strengthen constructive relationships to harness and optimise human capital within the organisation.

We have an active dialogue with our employees through the European Works Council (EWC), National Works Councils (NWC) and employee representatives on a range of issues. Our CEO meets with the EWC on a regular basis. Their feedback helps us stay attuned to the issues that affect our employees. In our communications to employees, we try to provide an honest and 'balanced voice' between good news and challenges to the business.

In countries where there is no National Works Council or union representation, we have other forms of information and consultation forums such as the UK Communication Committee, elected employee representatives in each office (e.g Japan) and Colt Ambassadors in each of our Colt countries.

#### Colt Social Dialogue Statement

Colt recognises the importance of social dialogue in addressing social issues and achieving sustained economic and business success. Colt has established listening strategies, employee networks, and partnerships with existing employee representative bodies to truly understand employee feedback, promote key messages, drive initiatives, and improve the overall employee experience and engagement. The company's Social Dialogue Statement provides a framework for sustainable collective relationships through all types of dialogue and information exchange on issues of common interest. Social dialogue helps Colt make better-informed business decisions, giving employees a voice, supporting meaningful dialogue, and sharing knowledge and feedback to influence strategic decisions and improve the quality of working life and culture within the organisation.

## 8.5. Data privacy and cybersecurity

Colt Group’s Privacy Goals and Global Privacy Policy enable us to effectively protect personal data and manage privacy risk. Having robust privacy and cybersecurity policies and processes ensures that our customers and other stakeholders can trust us with their data. The [Data Privacy Statement](#) is published on the Colt website.

### Industry first BCR

Colt’s Binding Corporate Rules (BCRs) set the rules for data protection and data transfer and were approved by the European Data Protection Board (EDPB) in August 2021. Colt Group was the first telecommunications company under the General Data Protection Regulation (GDPR) system to be given the BCR accreditation. The BCRs are the “gold standard” in privacy certification, providing us with the highest recognition in privacy that a group of companies can have.



Colt Group applies the principles of Privacy by Design and Privacy by Default at the very first stage of every product, application, policy, or system and along the lifecycle of the relevant data processes.

We have implemented data breach procedures as well as a complaints procedure for employees, customers, and third parties, and all employees take an annual training in Data Breach and Data Privacy compliance.

In 2022 Colt Group started working on the implementation of an information privacy management system following the ISO 27701 standard. We anticipate the certification to be in place by the end of 2023.

### Cyber Essentials Plus

In 2022 Colt Group became Cyber Essentials Plus certified. The Cyber Essentials scheme was set up by the UK government to encourage the widespread adoption of advanced cyber security practices to combat modern cyber threats. This certification is a prerequisite to apply to UK Government bids, meaning Colt Group is able to participate. This certification confirms Colt Group’s security posture to clients and ensures the organisation is protected against common security vulnerabilities. It was important to us to get this certification to show our commitment to cybersecurity and can provide peace of mind for customers as well as attract new business.

[Find out more](#)



98.3%

Of Colt Group employees have completed training on Data Protection

\*Data includes active and inactive employees and excludes Contractors Ongoing. The completion rate for new joiners was 87.4%

During 2022, we provided a Mandatory Privacy E-Learning Training for all employees.

To see more on how we manage data privacy and cybersecurity please read our [Data Privacy information](#)

# Appendix





# 9. Appendix

## 9.1. Our material topics and how we manage them

### Colt Group Materiality Assessment 2022

The business and regulatory landscape that we operate in evolves constantly.

During 2022, we undertook a review of our ESG materiality assessment from last year within the definition of the new Colt Group ESG Strategy strategy. We benchmarked our materiality assessment against eight companies consisting of customers, competitors and admired peers. We conducted interviews and surveys with 41 Colt Group executives and managers, interviewed five external stakeholders, and reviewed the relevant industry ESG materiality standards from SASB and GeSI.

Following the materiality review, we decided to include two new material topics: water management, land use and biodiversity for the Colt DCS business.

The review also highlighted that we should combine some of the existing material topics and reduce the overall number of material topics from 28 to 20. The refreshed prioritisation of topics will guide Colt Group’s sustainability strategy and drive the decision-making around our ESG activities.

Business resilience and adaptation	Waste and the Circular economy	Customer experience / satisfaction	Cybersecurity, privacy, and personal data protection	Climate change and GHG strategy
Energy management and consumption	Employee well-being and Health & Safety	Employee development and training	Engaging with communities	Land and biodiversity
Water management	Ethical and transparent business practices	Diversity and inclusion	Respect for human rights	Innovation and Digitalisation
Providing technology solutions for societal challenges	Employee Engagement	Responsible supply chain management	Foster dialogue with stakeholders	Anti-Corruption processes and training

Please see below more on how we define and manage our material topics.



Material Topic	Description	Where to read more
Business resilience and adaptation	Mitigating risks to the continued operation of our business	8.2 Risk management
Waste and the Circular economy	Minimising manufacturing waste and disposing of waste in the most responsible manner and contributing to the circular economy	6.6 Circular economy, waste and water
Customer experience / satisfaction	Going above and beyond for our customers	5.2 Deliver exceptional customer experience
Cybersecurity, privacy, and personal data protection	Defending Colt Group's assets against all threats from cyber-attack, and protection of personal data	8.5 Data Privacy and cybersecurity
Climate change and GHG strategy	Mitigating Colt Group's impact on climate change by reducing GHG emissions and air pollution across its value chain	6.2 Our journey to net zero 5.1 Technology as an enabler for sustainability 5.5 Innovation at our data centres 5.3 Partnering with our suppliers
Energy management and consumption	Reducing energy use and investing in renewable energy	6.4 Reducing emissions through renewable energy procurement and energy efficiency
Employee wellbeing and Health & Safety	Championing workplace safety to achieve a workplace of zero injuries, and providing a work environment that supports wellbeing	7.4 Employee wellbeing, health and safety
Employee growth development and training	Attracting talented employees and supporting their development and growth	7.3 Learning and development
Engaging with communities	Creating positive impact on the local community and the local environment in the places where Colt Group operates	7.5 Engaging with our communities
Land and biodiversity	Sourcing materials and designing buildings in a way that minimises impact to natural habitats	6.5 Nature and biodiversity 6.3 Innovations at our data centres
Water management	Achieving water efficiency and ensuring continued and equal access to water for communities in the areas where Colt group operates	5.5 Circular economy, waste and water
Ethical and transparent business practices	Adhering to the highest standards of honesty and integrity, promoting effective and accountable corporate governance practices and including transparent reporting	8.1 Responsible business practices 8.3 Business ethics 5.3 Partnering with our suppliers
Diversity and inclusion	Valuing the different perspectives brought by our diverse global teams	7.1 Our employees 7.2 Diversity, Equity and Inclusion 5.3 Partnering with our suppliers





Material Topic	Description	Where to read more
Respect for human rights	Protecting rights of all people in our operations and those of our suppliers	8.1 Responsible business practices 8.3 Business ethics 8.4 Human Rights and anti-slavery policy 5.3 Partnering with our Suppliers
Innovation and Digitalisation	Developing innovative products with sustainability characteristics	5.1 Technology as an enabler for sustainability 5.4 Innovation at the core of what we do 5.5 Innovation at our data centres
Providing technology solutions for societal challenges	Creating value to society and all our stakeholders through technological innovations and solutions	5.1 Technology as an enabler for sustainability
Employee Engagement	Supporting and developing employees' connection to Colt Group	7.1 Our employees 7.4 Employee wellbeing, health and safety 8.3 Business ethics 8.4 Human rights and anti-slavery policy
Responsible supply chain management	Minimising the negative environmental and social impacts of our supply chain operations	5.3 Partnering with our suppliers
Foster dialogue with stakeholders	Building honest and strong relationships with stakeholders	9.4 GRI Content Index, view GRI 2-29 engaging with our stakeholders
Anti-Corruption processes and training	Running our business and our supply-chain free of corruption and making sure our people have the tools to uphold our commitments	8.3 Business ethics

## 9.2. Colt Group's commitment to the UN Sustainable Development Goals

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

SDG	Examples of activities	Where to read more
	We prioritise the wellbeing of our employees. We have continued our wellbeing and mental health policies. We have also initiated new campaigns, including menopause awareness, mental health training for managers and financial wellbeing.	7. Trusted Employer and Neighbour
	Ensuring that employees have the skills for their current and future needs remains paramount. We have updated our learning and development programs, financed requests for external training and continued to hire new young talent into our graduate program.	7. Trusted Employer and Neighbour
	Gender equality is important to us and our Women+ employee network plays a key role in our efforts to ensure gender equality at Colt Group. The network volunteers also developed a training programme around personal development for women at Colt.	7. Trusted Employer and Neighbour 8. Responsible Business Practices and Good Governance
	We are committed to improving our energy efficiency and reducing our emissions. We strive to continuously improve our infrastructure to implement more energy-efficient technologies for both our own activities and our client service offering. We increased our solar energy production capacity at some of our data centres and offices.	6. Caring for the Environment
	We are dedicated to advancing decent work and economic growth by collaborating with partners to create sustainable solutions that promote economic growth, create jobs, and promote innovation. We work with our internal Disability Accessibility Network (DAN) to create an inclusive and accessible workplace for all.	5. Collaborating for a sustainable future 8. Responsible Business Practices and Good Governance
	We teamed up with external partners to create Proof of Concepts for smart buildings and offices that reduce their environmental footprint. We prioritised increasing the circularity of our network infrastructure through investment recovery partnerships.	5. Collaborating for a Sustainable Future
	We engaged with local charities to help address social and economic inequalities. We ensure ethical governance by applying robust anti-corruption and anti-bribery policies, implementing effective risk management systems and promoting transparency and accountability in our operations.	8. Responsible Business Practices and Good Governance
	We actively work towards reducing waste generation. Some of our data centres are on their way to achieving zero waste to landfill certification. At Colt we have a comprehensive investment recovery (IR) programme.	6. Caring for the Environment
	We are focused on reducing the impact our activities have on climate change. We invest in renewable energy solutions, set ambitious emission reduction targets and engage with our suppliers to reduce the environmental impacts in the supply chain.	6. Caring for the Environment
	We are implementing comprehensive supply chain engagement initiatives to ensure transparency by mapping our suppliers and monitoring their compliance with labour and environmental standards. We ensure respect for human rights in our supply chain and in our own activities.	5. Collaborating for a Sustainable Future 8. Responsible Business Practices and Good Governance
	We partner with other companies to achieve industry best practice, share knowledge, and develop resources to achieve the SDGs collectively.	5. Collaborating for a Sustainable Future 7. Trusted Employer and Neighbour

# External assurance statement by BSI





### 9.3. External assurance statement by BSI

The sustainability activities reported by Colt Technology Services Group Limited have been independently verified by BSI over the course of a 10 day audit to a Limited Level of Assurance.

The scope of this audit has been a verification of environmental statements and social and governance claims made in the 2022 Annual Sustainability Report, which included data and claims in the GRI Table. These elements were measured against GRI reporting guidelines. BSI verified data, calculations and claims.

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

The verification of environmental statements (in relation to Scope 1, 2 and 3 GHG emissions; waste quantities – total waste, waste to energy, waste to landfill, waste recycled, hazardous and non-hazardous) and fleet electrification has been carried out in line with the principals and guidance set out in ISO14016:2020, to a limited level of assurance and a materiality level of 5%.

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

# Global Reporting Initiative (GRI) Content Index





#### 9.4. Global Reporting Initiative (GRI) Content Index

<b>Statement of use</b>	Colt Group has reported in accordance with the GRI Standards for the period 1 <sup>st</sup> January- 31 <sup>st</sup> December 2022
<b>GRI 1 used</b>	GRI 1: Foundation 2021

GRI standard/other source	Disclosure	Location / direct answer	SDG
GRI 2: General Disclosures 2021	2-1 Organisational details	<p>Colt Technology Services Group Limited has the principal activity to act as an intermediary Holding company within the group comprising of Colt Group Holdings Limited and its subsidiaries ("the Group").</p> <p>Colt Group is a private company limited by shares, and is incorporated and registered in England and Wales, United Kingdom. The address of its registered office is Colt House, 20 Great Eastern Street, London, England, EC2A 3EH.</p> <p>Colt Group was founded in 1992 as City of London Telecommunications (COLT), backed by Fidelity. We expanded our operations into Europe, Japan and the USA in the following two decades. In 2010, we rebranded from COLT to Colt Technology Services and, in 2014, we further extended our reach into Japan and SE Asia .</p> <p>In 2015, Colt Group was delisted from the London Stock Exchange and formed two operationally distinct businesses: Colt Technology Services (Colt) and Colt Data Centre Services (DCS). Colt Group is owned by Fidelity Investments, solidifying us as one of the most financially stable businesses in the industry.</p> <p>Colt Group has subsidiaries in the countries listed on page 80-83 of the <a href="#">2022 Annual Report</a>.</p>	
	2-2 Entities included in the organisation's sustainability reporting	Colt Group <a href="#">2022 Annual Report</a> 2022, 28 Subsidiary undertakings 3, pages 80-83	12.6
	2-3 Reporting period, frequency and contact point	<p>This is Colt Group's second Sustainability report. These reports are published annually. This report covers the period 1 January 2022 - 31 December 2022.</p> <p>This report is published on Colt's website For more information, please contact: <a href="mailto:ESTeam@colt.net">ESTeam@colt.net</a></p>	
	2-4 Restatements of information	<a href="#">6.4 Reducing emissions through renewable energy and energy efficiency</a> <a href="#">9.5.Greenhouse Gas Calculation Methodology and Restatements</a>	
	2-5 External assurance	<a href="#">9.3 External Assurance statement by BSI</a>	
	2-6 Activities, value chain and other business relationships	<a href="#">3. About Colt Group</a> Product portfolios: <a href="#">Colt Product Portfolio</a> <a href="#">Colt DCS Product Portfolio</a> Colt also engages with various partners: <a href="#">Colt Partners</a> <a href="#">Colt Charity Partners</a> <a href="#">5.3 Partnering with our suppliers</a>	8.2



GRI standard/other source	Disclosure	Location / direct answer	SDG																																																																																																																																																																																																																				
GRI 2: General Disclosures 2021	2-7 Employees	<p>7.1 our employees 99% of Colt Employees received a performance rating. Colt Group employees figures*:</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2"></th> <th colspan="2">2020</th> <th colspan="2">2021</th> <th colspan="2">2022</th> </tr> <tr> <th>Total</th> <th>Females (%)</th> <th>Total</th> <th>Females (%)</th> <th>Total</th> <th>Females (%)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">France</td> <td>Full-time</td> <td>276</td> <td>29%</td> <td>266</td> <td>28%</td> <td>284</td> <td>30%</td> </tr> <tr> <td>Part-time</td> <td>4</td> <td>100%</td> <td>5</td> <td>100%</td> <td>3</td> <td>100%</td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>280</b></td> <td><b>30%</b></td> <td><b>271</b></td> <td><b>30%</b></td> <td><b>287</b></td> <td><b>31%</b></td> </tr> <tr> <td rowspan="3">Germany</td> <td>Full-time</td> <td>374</td> <td>15%</td> <td>379</td> <td>16%</td> <td>385</td> <td>16%</td> </tr> <tr> <td>Part-time</td> <td>54</td> <td>80%</td> <td>61</td> <td>80%</td> <td>60</td> <td>77%</td> </tr> <tr> <td><b>TOTAL</b></td> 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GRI 2: General Disclosures 2021	2-7 Employees			2020		2021		2022	
				Total	Females (%)	Total	Females (%)	Total	Females (%)
		France	Permanent	273	30%	266	29%	282	30%
			Temporary	7	29%	5	40%	5	80%
			TOTAL	280	30%	271	30%	287	31%
		Germany	Permanent	418	23%	422	24%	423	24%
			Temporary	10	50%	18	44%	22	36%
			TOTAL	428	23%	440	25%	445	24%
		India	Permanent	1817	24%	1818	25%	1883	24%
			Temporary	46	65%	41	34%	45	36%
			TOTAL	1863	25%	1859	25%	1928	25%
		Italy	Permanent	127	24%	124	24%	128	23%
			Temporary	2	50%	1	100%	1	100%
			TOTAL	129	25%	125	25%	129	24%
		Japan	Permanent	307	22%	313	22%	326	23%
			Temporary	32	34%	20	25%	26	31%
			TOTAL	339	23%	333	23%	352	24%
		Spain	Permanent	564	37%	572	38%	578	39%
			Temporary	9	44%	11	55%	14	71%
			TOTAL	573	37%	583	39%	592	40%
		United Kingdom	Permanent	765	26%	801	27%	818	29%
			Temporary	77	58%	40	48%	28	43%
			TOTAL	842	29%	841	28%	846	29%
		Rest of Colt Group	Permanent	697	36%	723	37%	730	40%
			Temporary	151	74%	149	73%	152	72%
			TOTAL	848	43%	872	43%	882	45%
		TOTAL	Permanent	4968	28%	5039	29%	5168	29%
			Temporary	334	63%	285	58%	293	58%
			TOTAL	5302	30%	5324	30%	5461	31%
	2-8 Workers who are not employees	Omission: Not applicable.  Colt defines “employees” as people employed by Colt, regardless of employment type (Employee, Apprentice, Graduate Rotational, Intern, Contractor Ongoing, Contract Trainee, Fixed Term Employee); excluding temporary Professional Service Providers, who are procured via an SOW. This means that the majority of persons who work for Colt Group are covered by our employee definition.							5.5, 10.2, 10.3
	2-9 Governance structure and composition	You can view the members of the Colt Group Board here: <a href="#">Our Leadership Team</a>							5.5, 16.6, 16.7
	2-10 Nomination and selection of the highest governance body	Colt’s shareholders appoint directors of the Board, which is the highest governance body of Colt Group.							5.5, 10.2, 16.6, 16.7
	2-11 Chair of the highest governance body	<a href="#">Michael Wilens</a> was appointed as a board member of Colt Group’s top company on 1 January 2012 and as Chairman on 21 March 2018.							5.5, 10.2, 16.6, 16.7





GRI 2: General Disclosures 2021	2-12 Role of the highest governance body in overseeing the management of impacts	<a href="#">9.5 Responsible business practices</a> Colt Group <a href="#">2022 Annual Report</a> , Directors report, Wates Principle 3, page 20	16.6
	2-13 Delegation of responsibility for managing impacts	<a href="#">Annual report 2022</a> , Directors report, Wates Principle 3, page 19	16.6
	2-14 Role of the highest governance body in sustainability reporting	Colt Executive Leadership Team, Colt DCS Senior Leadership team and Sustainability SteerCo members provide the final approval of the sustainability report before publication.	16.6
	2-15 Conflicts of interest	The management of conflicts of interest is the same as in 2021, please see <a href="#">Colt Sustainability Report 2021, p.27</a> Colt Group's Code of Business Conduct sets out the overall standards and commitments towards ethical conduct, conflict of interest, anti-corruption, whistleblowing and legal compliance. These standards extend to Colt and DCS's suppliers, partners, agents, employees and subcontractors.	16.6
	2-16 Communication of critical concerns	Colt Group has established a whistle-blowing system, and our employees are encouraged to raise actual or suspected breaches of the Code of Business Conduct. Reports can be made via the independent Business Ethics Line or by reporting to the Corporate Compliance Committee. Anonymous reporting is possible wherever permitted by local law.  The Corporate Compliance Committee reports quarterly to the Audit Committee about breaches or suspected breaches, raised to the Corporate Compliance Committee, of the Code of Business Conduct..	16.6
	2-17 Collective knowledge of the highest governance body	<a href="#">Annual report 2022</a> , Directors report, Wates Principle 2, page 19	10.4, 13.1, 13.3
	2-18 Evaluation of the performance of the highest governance body	As Colt Group is a private company, there is no obligation to fulfill this requirement.	5.5, 10.3, 10.4, 13.3
	2-19 Remuneration policies	<a href="#">Annual report 2022</a> , Directors report, Wates Principle 5, page 20-21	5.5, 10.2, 10.3, 10.4
	2-20 Process to determine remuneration	<a href="#">Annual report 2022</a> , Directors report, Wates Principle 5, page 20-21	5.5, 10.2, 10.3, 10.4
	2-21 Annual total compensation ratio	Omission: confidentiality reasons	10.2, 10.3, 10.4
2-22 Statement on sustainable development strategy	<a href="#">4. Our sustainability strategy</a>		
2-23 Policy commitments	Our policy commitments have been approved by our CEOs. Our suppliers are also aware of our commitments. Policy commitments can be seen in: <a href="#">5.3 Partnering with our suppliers</a> <a href="#">8.4 Human rights and anti-slavery policy</a> Last year's <a href="#">Colt Sustainability Report 2021, p.27</a> <a href="#">Code of Business Conduct</a> <a href="#">Supplier Code of Conduct</a> <a href="#">Certifications</a>	8.7, 10.4, 13.1	



GRI 2: General Disclosures 2021	2-24 Embedding policy commitments	Colt Group's policy commitments are embedded in the our sustainability, I&D, procurement and other programmes. Our policy implementation responsibilities are delegated to functions within each department, in addition to governance responsibility delegated to the ESG Team. They are also embedded in our Business and Supplier Code of Conducts. Colt Group's Code of Business Conduct is a comprehensive document for ethical conduct including critical aspects such as not tolerating bribery, speaking up to report breaches of the Code, fair competition, data protection, gifts and business hospitality, anti-fraud, prevention of money laundering and conflicts of interest. All Colt Group employees must complete annual mandatory Code of Business Conduct.			8.7, 10.4, 13.1																				
	2-25 Processes to remediate negative impacts	<a href="#">8.3. Business ethics</a> Every breach of the Code of Business Conduct is raised in line with the below response in 2-26. All reports of suspected or actual breaches of the Code of Business Conduct raised to the Corporate Compliance Committee are fully investigated, and the Corporate Compliance Committee use lessons learned to update the Code, to provide recommendations on the annual mandatory Code of Business Conduct training and on organisational changes.			16.6																				
	2-26 Mechanisms for seeking advice and raising concerns	Colt Group has established a whistle-blowing system, and its employees are encouraged to raise actual or suspected breaches of the Code of Business Conduct via multiple available channels. Reports can be made via the independent 24/7 Business Ethics Line or by reporting to the Corporate Compliance Committee. Anonymous reporting is possible wherever permitted by local law. The Corporate Compliance Committee reports quarterly to the Audit Committee about breaches or suspected breaches of the Code of Business Conduct. The members of the Colt Board and its subcommittees receive training around their duties when appointed			16.6																				
	2-27 Compliance with laws and regulations	Omission: confidentiality reasons																							
	2-28 Membership associations	<a href="#">5.1. Technology as an enabler for sustainability</a> <a href="#">5.3. Partnering with our suppliers</a> <a href="#">6.1. Our approach to environmental management</a> <a href="#">7.2. Diversity, Equity and Inclusion</a>																							
	2-29 Approach to stakeholder engagement	<table border="1"> <thead> <tr> <th>Stakeholder Group</th> <th>Colt Group's approach</th> <th>Methods of Engagement</th> </tr> </thead> <tbody> <tr> <td>Customers</td> <td>We aim to put the customer at the heart of everything we do, and we have an ever-evolving programme of customer intelligence that helps us to improve the experience we give our customers.</td> <td> <ul style="list-style-type: none"> <li>Customer information service</li> <li>Customer satisfaction surveys</li> <li>Website, social media</li> </ul> </td> </tr> <tr> <td>Employees</td> <td>Engaging with and having a two-way dialogue with the entire workforce are very important for the Company's purpose and vision. 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GRI 2: General Disclosures 2021	2-30 Collective bargaining agreements	<a href="#">8.4 Human rights and anti-slavery policy</a> <p>Colt Group is committed to creating an environment that promotes fair treatment and a healthy work-life balance. As a result we aim to keep working overtime to an absolute minimum and have implemented a Global Overtime policy. The purpose of our Global Overtime policy is to provide a general guideline for employees who are eligible for overtime, above the maximum statutory or agreed working hours. The Global Policy will implement a minimum standard and provision to be applied across Colt Group subject local law and/or local policies.</p> <p>Overtime shall not exceed the legal limit as per each country's local regulations or HR policy. Employees are advised to take at least 24 hours of rest within 7 consecutive days.</p> <p>Colt Group provides additional remuneration to compensate for overtime work as per local law and/or local policies.</p>	8.5, 8.7, 8.8
<b>Material topics</b>			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	<a href="#">9.1 Our material topics and how we manage them</a>	12.6
	3-2 List of material topics	<a href="#">9.1 Our material topics and how we manage them</a>	12.6
<b>Economic performance</b>			
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">8.2 Risk Management</a>	12.6, 13.1
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	<a href="#">8.2 Risk Management</a> <p>Colt Group's related risk assessment covers various types of risks, including current and emerging regulations, legal, market, reputation, and both acute and chronic physical risks. Additionally, several business opportunities have been identified resulting from climate change, such as the emerging market for low emissions goods and services, increased potential use of cloud computing, and the adoption of hybrid working.</p> <p>Colt is currently updating its technology platforms within the network to reduce power and space consumption per bit bandwidth, with environmental sustainability and emissions reduction being key focuses throughout the evolution of its network. On the DCS side, we recognise that changes in society driven by a desire to reduce carbon emissions present significant growth opportunities for cloud computing. To take advantage of this opportunity, we ensure that new data centres sites are constructed and operated sustainably, which enables us to target the fastest-growing hyperscale customers, while supporting their transition to more sustainable operators. We are committed to developing class-leading facilities that minimise carbon and climate impacts, and our newest data centre in the UK has been designed following best practices for sustainable buildings and data centres.</p> <p>The adoption of hybrid working among companies globally has been driven not only by the recent global pandemic but also by ongoing efforts to become more sustainable through reduced travel and lower energy consumption in office spaces. In 2021, Colt Group launched its Hybrid Working proposition: a set of new and existing Colt services that help enterprises ensure their network and voice infrastructures can support this new way of working.</p>	12.6, 13.1



Anti-corruption																																														
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">8.3 Business ethics</a> <a href="#">9.1 Our material topics and how we manage them</a>		16.5																																										
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	<p>8.4 Business Ethics</p> <table border="1"> <tr> <td colspan="2">Communication and Training on Anti-corruption/bribery by employee category *</td> <td>2022</td> </tr> <tr> <td colspan="2"></td> <td>Total</td> </tr> <tr> <td rowspan="5">Number of employees that have received training on anti-corruption</td> <td>Leadership (EX1, EX2)</td> <td>8</td> </tr> <tr> <td>Sr .Manager / Sr. Consultant (S1, M1)</td> <td>102</td> </tr> <tr> <td>Manager / Consultant (S2, M2)</td> <td>251</td> </tr> <tr> <td>Professional (PT1, PT2)</td> <td>153</td> </tr> <tr> <td>TOTAL</td> <td>514</td> </tr> </table> <table border="1"> <tr> <td colspan="2">Communication and Training on Anti-corruption/bribery by Region *</td> <td>2022</td> </tr> <tr> <td colspan="2"></td> <td>Total</td> </tr> <tr> <td rowspan="8">Number of employees that have received training on anti- corruption</td> <td>France</td> <td>44</td> </tr> <tr> <td>Germany</td> <td>64</td> </tr> <tr> <td>India</td> <td>52</td> </tr> <tr> <td>Italy</td> <td>25</td> </tr> <tr> <td>Japan</td> <td>59</td> </tr> <tr> <td>Spain</td> <td>36</td> </tr> <tr> <td>United Kingdom</td> <td>117</td> </tr> <tr> <td>Rest of Colt</td> <td>117</td> </tr> <tr> <td>TOTAL</td> <td>514</td> </tr> </table> <p>*Additional Anti-Bribery &amp; Corruption (ABC) training was assigned to all Colt Group employees in addition to the mandatory Code of Business Conduct.</p>		Communication and Training on Anti-corruption/bribery by employee category *		2022			Total	Number of employees that have received training on anti-corruption	Leadership (EX1, EX2)	8	Sr .Manager / Sr. Consultant (S1, M1)	102	Manager / Consultant (S2, M2)	251	Professional (PT1, PT2)	153	TOTAL	514	Communication and Training on Anti-corruption/bribery by Region *		2022			Total	Number of employees that have received training on anti- corruption	France	44	Germany	64	India	52	Italy	25	Japan	59	Spain	36	United Kingdom	117	Rest of Colt	117	TOTAL	514	
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GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">6.2. Our journey to net zero</a> <a href="#">6.4 Reducing emissions through renewable energy procurement and energy efficiency</a> <a href="#">9.1 Our material topics and how we manage them</a>		7.2, 12.2																																										
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	<p>See percentage of renewable electricity at Colt Group in section <a href="#">6.4 Reducing emissions through renewable energy procurement and energy efficiency</a></p> <table border="1"> <tr> <td>Non- renewable sources</td> <td>2021</td> <td>2022</td> </tr> <tr> <td>Natural Gas (MWh)</td> <td>2,107</td> <td>1,219</td> </tr> <tr> <td>Other fuels (l)</td> <td>349,652</td> <td>361,540</td> </tr> </table> <p>Omission: Colt Group is unable to provide the energy consumption breakdown for heating, cooling and steam consumption.</p>		Non- renewable sources	2021	2022	Natural Gas (MWh)	2,107	1,219	Other fuels (l)	349,652	361,540	7.2, 12.2																																	
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	302-4 Reduction of energy consumption	<a href="#">6.4 Reducing emissions through renewable energy procurement and energy efficiency</a>		12.2																																										



Water and effluents					
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">6.6 Circular economy, waste and water</a> <a href="#">9.1 Our material topics and how we manage them</a>			13.1, 13.2,
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	<a href="#">6.6 Circular economy, waste and water</a>			13.1, 13.2, 13.3
	303-2 Management of water discharge-related impacts	<a href="#">6.6 Circular economy, waste and water</a>			13.2, 13.3
	303-5 Water consumption	Colt Group Total Water Consumption (m3)	2021 179,952	2022 364,885	
Biodiversity					
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">6.6 Circular economy, waste and water</a> <a href="#">9.1 Our material topics and how we manage them</a>			12.2, 12.6, 13.3
GRI 304: Biodiversity 2016	304-2 Significant impacts of activities, products and services on biodiversity	Omission: not enough information			13.3
Emissions					
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">6.2. Our journey to net zero</a> <a href="#">6.3 Carbon management</a> <a href="#">6.4 Reducing emissions through renewable energy procurement and energy efficiency</a> <a href="#">9.1 Our material topics and how we manage them</a>			12.2, 12.6, 13.1
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	<a href="#">6.3 Carbon management</a> Colt Group has an intranet area for employees explaining our baseline emissions, progress and road-map for reduction. We believe that communicating this information internally have a positive impact on our carbon roadmap.			12.2, 13.1
	305-2 Energy indirect (Scope 2) GHG emissions	<a href="#">6.3 Carbon management</a>			12.2, 13.1
			2020	2021	2022
		Gross location-based indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.	81,021.0	76,689.2	53,708.4
	305-3 Other indirect (Scope 3) GHG emissions	<a href="#">6.3 Carbon management</a>			12.2, 13.1
	305-5 Reduction of GHG emissions	<a href="#">6.3 Carbon management</a>			12.2, 13.1



Waste			
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">6.6 Circular economy, waste and water</a> <a href="#">9.1 Our material topics and how we manage them</a> We have formalised policies through our updated Waste Management Policy, Duty of Care (Waste Control) Procedure and WEEE Disposals Policy and Procedure to manage the waste and Waste Electronic and Electrical Equipment generated by our activity.  Duty of Care (Waste Control) procedure define the process to ensure third parties manages the waste in accordance with legal requirements.	12.2, 12.6, 13.1
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	<a href="#">6.6 Circular economy, waste and water</a>	13.1
	306-2 Management of significant waste-related impacts	<a href="#">6.6 Circular economy, waste and water</a>	11.6, 12.4
	306-3 Waste generated	<a href="#">6.6 Circular economy, waste and water</a>	11.6, 12.2, 12.4, 13.1
	306-4 Waste diverted from disposal	<a href="#">6.6 Circular economy, waste and water</a>	11.6, 12.2, 12.4, 13.1
	306-5 Waste directed to disposal	<a href="#">6.6 Circular economy, waste and water</a>	12.2, 12.5
Supplier environmental assessment			
GRI 3: Material Topics 2021	3-3 Management of material topics	5.3. Partnering with our suppliers 9.1 Our material topics and how we manage them	12.6, 13.1
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	5.3 Partnering with our suppliers	12.6, 13.1
Employment			
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">7.1 Our employees</a> <a href="#">9.1 Our material topics and how we manage them</a>  Colt Group prioritises transparency and reciprocal expectations. The details of working conditions are captured in the employment contract and employee handbooks of each country. These are communicated with the employee at the time of hiring and are available on the Colt Group internal portals. Colt Group also has an extensive Human Resources policy guide which lists all of its polices and their applicability. In certain legislations all employees are covered by collective bargaining agreements. All employees receive full Code of Conduct training and is available at all time for further guidance.	5.1, 8.5, 10.2, 10.3



GRI 401: Employment 2016

401-1 New employee hires and employee turnover

7.1 Our employees

Colt Group new employee hires and employee turnover by country and gender\*:

		2020		2021		2022	
		Total	Females	Total	Females	Total	Females
Japan	Total new hire	47	10	58	19	68	25
	Turnover	38	14	59	20	48	16
	New hire rate	13.9	12.7	17.4	25.3	19.3	30.1
	Turnover Rate	11.4	17.5	17.4	26.0	13.9	20.1
Germany	Total new hire	29	9	30	12	25	5
	Turnover	25	6	19	3	20	6
	New hire rate	6.8	9.0	6.8	10.9	5.6	4.6
	Turnover Rate	5.9	6.2	4.4	2.9	4.5	5.5
United Kingdom	Total new hire	161	63	156	54	155	82
	Turnover	100	35	144	56	148	71
	New hire rate	19.1	25.8	18.5	22.7	18.3	33.2
	Turnover Rate	12.3	15.2	16.8	22.5	17.5	28.7
France	Total new hire	24	7	15	6	35	19
	Turnover	13	6	24	9	18	10
	New hire rate	8.6	8.4	5.5	7.5	12.2	21.6
	Turnover Rate	4.8	7.4	8.7	11.0	6.3	11.6
Spain	Total new hire	49	11	58	25	59	28
	Turnover	28	13	49	14	44	18
	New hire rate	8.6	5.1	9.9	11.1	10.0	12.0
	Turnover Rate	4.9	6.0	8.4	6.3	7.5	7.8
Italy	Total new hire	4	3	4	2	6	2
	Turnover	5	2	8	1	2	2
	New hire rate	3.1	9.4	3.2	6.5	4.7	6.5
	Turnover Rate	3.8	6.2	6.3	3.2	1.6	6.5
India	Total new hire	273	123	320	124	467	129
	Turnover	165	47	286	92	374	109
	New hire rate	14.7	26.5	17.2	26.4	24.2	27.2
	Turnover Rate	9.1	10.7	15.3	19.3	19.9	23.2
Rest of Colt Group	Total new hire	119	76	145	75	125	79
	Turnover	73	32	120	62	113	56
	New hire rate	14.0	20.9	16.6	19.8	14.2	19.8
	Turnover Rate	8.7	9.1	14.0	16.8	12.9	14.3
TOTAL	Total new hire	706	302	786	317	940	369
	Turnover	447	155	709	257	767	288
	New hire rate	13.3	19.1	14.8	19.7	17.2	22.1
	Turnover Rate	8.6	10.1	13.3	15.9	14.3	17.5

\* Headcount as of 31st December. New hire rate: (total new hires in year/total employees at end of the year) x100). Turnover rate: (total leavers in year/total employees at end of the year) x100

5.1, 8.5, 10.2, 10.3



GRI 401: Employment 2016	Colt Group new employee hires and employee turnover by age and gender*:																																																																																																																																																															
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401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	<p><a href="#">7.1 Our employees</a>  <a href="#">7.4. Employee wellbeing, health and safety</a></p> <p>Colt Group benefits are available to all full-time and part-time workers, with the exception of ongoing contractors.</p> <p>Colt Group provides:</p> <ul style="list-style-type: none"> <li>Employee Assistance Program - Provided in all countries, employees access this online or via their local phone number</li> <li>Clear your plate Days - A day once a month where staff are encouraged keep their day free from meetings and video calls, allowing them to catch up on work and self development or work on tasks away from a computer screen.</li> <li>Safe Workspace Allowance - A Euro amount where an employee can claim back for any monitors, keyboards, chairs or desks purchased to aid working from home .</li> </ul>	3.8, 10.4																																																																																																																																																														





Occupational health and safety			
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">7.4. Employee wellbeing, health and safety</a> <a href="#">9.1 Our material topics and how we manage them</a>  Colt Group provides a safe and healthy workplace, and we continuously strive to improve workplace safety and employee awareness and behaviour.  Colt Group's Health and Safety Policy Statement sets out its health and safety (H&S) commitments to effectively manage and safeguard employees, contractors and any others who may be affected by our activities.  Colt Group is committed to designing and implementing a comprehensive H&S management system. This system identifies legal compliance requirements and risks, delivering mitigations in a consistent, effective and transparent manner following the principles of ISO 45001:2018 standard. We define strategies that promote a culture of incident prevention and health promotion. We provide safe and healthy working conditions to prevent work-related accidents, injuries and ill-health. We define strategies that promote a culture of incident prevention and health promotion.  H&S is discussed with employee representatives at different levels: EWC, National Workers Councils and specific Country Health and Safety Committees (where legally applicable), and in other countries (as best practice).	8.8
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Colt Group's H&S management system is designed to meet the requirements of ISO 45001:2018 integrated with our environmental management system on ISO 14001:2015.  General HSE Procedures have a global version in English, as it is the global company-wide language. Specific local procedures are written in local languages.	8.8
	403-2 Hazard identification, risk assessment, and incident investigation	A risk assessment procedure has been developed as part of our OHSMS. Due to the complexities of Colt Group's countries of operation and local legislative demands, some risk assessments are conducted by specialised service providers and in other situations a number of templates are available for use by Colt Group staff.  H&S assessments focus on the identification of existing and reasonably foreseeable hazards. These hazards are then quantified to establish a level of risk which, in turn, promotes consideration of an appropriate control measure. Any findings are reported via the OHSMS management review mechanisms and used to continually improve the system.  The Colt Group generic assessments for technical and office activities are managed through the Colt Group HS&E support structure.  Internal audits are performed annually to ensure and verify our OHSMS implementation. Any Colt Group employees receive relevant H&S training in accordance with the competency needed for their involvement on the OHSMS.  Hazardous substances risks are also taken into account and a specific process exist for the use, storage and disposal of hazardous substances.  Internal audits and site inspections are performed annually to ensure and verify our OHSMS implementation.  Employees are provided with necessary Personal Protective Equipment in accordance with their Risk Assessment.	8.8
	403-5 Worker training on occupational health and safety	A training matrix exist as part of our OHSMS training procedure. It includes  A compulsory training program for new joiners in accordance with country regulations and a global set of H&S modules where no specific requirements are set. These modules are: Understanding Health and Safety, Reporting H&S Incidents, Lifting and Carrying and Fire Safety. The online tool Cardinus provides training and includes a self-assessment questionnaire on their own workplace to all employees. The module Display Screen Equipment Risks was added in 2022.  Applicable to operational staff: Staying safe on the road, Working at height, Hazardous Substances, Stress Management, Asbestos Awareness and Behavioural Safety  Applicable to specific groups: Formal safety qualifications for HS&E teams, Fire Warden and First Aiders training, trade training for engineering staff to maintain relevant legislative compliance and specific risks training for site managers.  Subcontractors are contractually requested to comply with the applicable legal H&S regulations as employers. In some countries proof of H&S training provision is requested to subcontractors. Contractors are required to complete mandatory H&S training provided by Colt Group. In addition, Health and Safety training materials are given and different awareness activities are done as part of the H&S management of third parties and specially for the most risky activities when working at Colt Group sites.	8.8



GRI 403: Occupational Health and Safety 2018	403-6 Promotion of worker health	<a href="#">7.4. Employee wellbeing, health and safety</a> As a company, it's our job to look after our employees. Taking care of our employees and their wellbeing means they'll be more engaged, more productive, able to bring their full selves to work and be less likely to experience burnout.  Occupational Health Services (initial and periodical medical check-ups) are offered according to H&S legal requirements in various countries.	3.8																												
	403-8 Workers covered by an occupational health and safety management system	All employees (100%) are covered by a H&S Management system, some by one fully aligned to ISO 45001 standard and others by one in accordance with local legal requirements.	8.8																												
	403-9 Work-related injuries	Colt Group work-related injuries: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2"></th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td colspan="2">Total hours worked</td> <td>8,623,613</td> <td>9,102,109</td> <td>9,097,815</td> </tr> <tr> <td rowspan="2">Injuries</td> <td>The number of recordable work-related injuries</td> <td>2</td> <td>1</td> <td>0</td> </tr> <tr> <td>The rate of recordable work-related injuries (x 1,000, 000)</td> <td>0.2</td> <td>0.1</td> <td>0</td> </tr> <tr> <td rowspan="2">Fatalities</td> <td>The number of fatalities as a result of work-related injury</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>The rate of fatalities as a result of work-related injury (x 1,000, 000)</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>			2020	2021	2022	Total hours worked		8,623,613	9,102,109	9,097,815	Injuries	The number of recordable work-related injuries	2	1	0	The rate of recordable work-related injuries (x 1,000, 000)	0.2	0.1	0	Fatalities	The number of fatalities as a result of work-related injury	0	0	0	The rate of fatalities as a result of work-related injury (x 1,000, 000)	0	0	0	8.8
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GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	<a href="#">7.3 Learning and Development</a> <a href="#">7.4. Employee wellbeing, health and safety</a>	4.4																												
<b>Diversity and equal opportunity</b>																															
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">7.2. Diversity, Equity &amp; Inclusion</a> <a href="#">9.1 Our material topics and how we manage them</a> The Colt Code of Conduct outlines the standards of conduct that we hold our employees, suppliers and customers to account. It provides contact details for the Corporate Compliance Committee and the Business Ethics Line, which can be used to raise potential violations of the Code of Conduct, including discrimination and harassment issues. Our global reward principles are committed to ensuring our pay practices support consistent and fair decisions regardless of any protected characteristics. We currently produce and monitor the gender pay gap in some countries, and annually monitor base pay and bonus decisions through a gender lens during our global pay review process. In addition, we are currently reviewing the principles of the EU Pay Transparency Directive ahead of 2026 to look for new opportunities to add to our principles and approach globally.  In 2022, Colt UK overall mean gender pay gap for hourly pay was 9%. This is a 4% improvement compared to 2021 and is due to better female representation overall and higher female representation in the upper quartile. The median bonus gap reduced was 19% comparing to 23% in 2021. You can read the full details in the <a href="#">2022 UK Pay Gap Report</a> In Spain, Barcelona Shared Service Center's salary gap in 2022 was 2,64 % ( compared to 4% in 2021) and for Colt Spain it was 11,68% ( compared to 13% in 2021). The Gender Equality commission in Colt Spain continues to work on closing the pay gap, attracting female candidates to mostly male dominated roles or promoting gender neutral language among other initiatives. Colt in Spain has renewed the commitment of Diversity Charter through Fundación Diversidad in Spain. Diversity Charter is an initiative of the EU Commission, it is a public pledge to promoting diversity and equal opportunities for its staff and contribute to creating inclusive practices along with customers, suppliers and partners.  Colt Group has two gender targets for December 2023: Total female employees: 33.2% Female employees in senior roles: 23.7%	5.5, 8.5, 10.2, 10.3, 16.7																												



GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	<a href="#">7.2. Diversity, Equity &amp; Inclusion</a> <a href="#">8.1. Responsible business practices</a>	5.5, 8.5, 10.2, 10.3, 16.7
<b>Local communities</b>			
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">7.5 Engaging with our communities</a> <a href="#">9.1 Our material topics and how we manage them</a>  <a href="#">Our Community</a>	4.a
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	<a href="#">7.5 Engaging with our communities</a>	4.a
<b>Supplier social assessment</b>			
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">5.3. Partnering with our suppliers</a> <a href="#">9.1 Our material topics and how we manage them</a>	8.7, 8.8, 10.3, 12.6
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	<a href="#">5.3. Partnering with our suppliers</a> <a href="#">9.1 Our material topics and how we manage them</a>	8.7, 8.8, 10.3, 12.6
<b>Customer privacy</b>			
GRI 3: Material Topics 2021	3-3 Management of material topics	<a href="#">8.5. Data privacy and cybersecurity</a> <a href="#">9.1 Our material topics and how we manage them</a>  <a href="#">Data Privacy information</a>	16.6
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Omission: Confidentiality constraints	16.6



## 9.5. Greenhouse gas emissions calculation methodology and restatements

Colt Group quantifies and reports its organisational GHG emissions in alignment with the World Resources Institute's Greenhouse Gas Protocol Corporate Accounting and Reporting Standard, in alignment with the Scope 2 Guidance. Colt Group consolidates its organisational boundary according to the **operational control** approach, which includes all assets that have an environmental impact over which the group has operational control. This means having full authority to introduce and implement operating policies.

### GHG emissions for 2019-2022 cover the following categories:

- Scope 1: Natural Gas, fuel from Own Fleet, Refrigerants and Other Fuel (in generators) consumption.
- Scope 2: Electricity consumption at Colt and Colt DCS-owned and operated sites.
- Scope 3: Purchased Goods & Services; Capital Goods; Fuel- and Energy-Related Activities (FERA); Upstream Transportation & Distribution; Waste Generated in Operations; Business Travel, Employee Commuting, Upstream Leased Assets, and Downstream Leased Assets.

### Scope coverage:

- GHG emissions include all Colt Group countries except: Emissions for 2019 & 2020: US not included.
- Emissions for 2019, 2020, 2021 & 2022: South Korea & Poland not included.
- Those three countries represent less than 5% of Colt Group emissions, so can be considered immaterial for the purposes of Colt Group GHG emissions calculations.

### Emission Factors used:

- Defra 2022, 2021, 2022 & 2019 for Scope 1 across Colt Group, Scope 2 in the UK, and the following Scope 3 categories - Fuel-and-Energy-Related Activities FERA, Waste, Waste, Business Travel and Employee Commuting
- EA 2022, 2021, 2022 & 2019 for Scope 2 electricity in Europe, Asia and US, Scope 3 categories (Homeworking, Downstream Leased Assets and Upstream Leased Assets)
- Quantis emission factors for Scope 3 Purchased Goods and Services, and Capital Goods spend-based GHG emission calculations
- Emission calculations provided by DHL for Scope 3 Upstream Transportation and Distribution category

In 2022, Colt Group updated and restated its 2019 baseline for its Science-Based Target (SBT) to include Colt Group's global operations and ensure it aligned to the most up-to-date best practice, for example including well-to-tank (WTT) calculations for Scope 3. Colt Group took this opportunity to replace previously estimated data with actual data and updated some emissions factors to align with best practice, thereby improving data accuracy. All data changes in 2019 are minor and immaterial to overall emissions.

In 2022, Colt Group established a quarterly emissions reporting programme. This allows us to collect data more frequently, accurately track anomalies and improve overall accuracy. This has resulted in a restatement of the previously reported 2021 emissions due to the collection of actual data to replace estimations. Additionally, 2020 Scope 1 figures were restated due to an update in some emission factors.

It has been important for Colt Group to recognise that its emissions profile is variable. The group is continuously working towards best practices, collecting actual data (even if it is from previous years), and updating methodologies to ensure consistency year on year. This may continue to result in an update in Colt Group's emissions. Where this does occur, Colt Group will clearly state this in its reports.



Colt Group GHG emissions in metric tonnes CO <sub>2</sub> e (restated data)*	2019 (base year)	2020	2021	2022	Variation against 2019 baseline
<b>Gross direct (Scope 1) GHG emissions in metric tons of CO<sub>2</sub>e</b>	4,459	4,297	3,259	2,948	-34%
<b>Gross indirect (Scope 2) GHG emissions in metric tons of CO<sub>2</sub>e (market-based)</b>	32,146	26,552	10,260	10,499	-67%
<b>Gross direct and indirect (Scope 1+2) GHG emissions in metric tons of CO<sub>2</sub>e (market-based)</b>	36,605	30,850	13,519	13,448	-63%
<b>Gross Indirect (Scope 3) emissions in metric tons of CO<sub>2</sub>e (market-based)</b>	602,960	575,846	544,738	433,438	-28%
<b>Total emissions in metric tons of CO<sub>2</sub>e (market-based)</b>	639,565	606,696	558,256	446,886	-30%

Colt Group GHG emissions in metric tonnes CO <sub>2</sub> e (published in 2021)*	2019 (base year)	2020	2021	Variation against 2019 baseline
<b>Gross direct (Scope 1) GHG emissions in metric tons of CO<sub>2</sub>e</b>	4,832	4,266	3,259	-33%
<b>Gross indirect (Scope 2) GHG emissions in metric tons of CO<sub>2</sub>e (market-based)</b>	23,822	26,552	18,197	-24%
<b>Gross direct and indirect (Scope 1+2) GHG emissions in metric tons of CO<sub>2</sub>e (market-based)</b>	28,654	30,819	21,456	-25%
<b>Gross Indirect (Scope 3) emissions in metric tons of CO<sub>2</sub>e (market-based)</b>	595,865	575,846	536,077	-10%
<b>Total emissions in metric tons of CO<sub>2</sub>e (market-based)</b>	624,519	606,665	557,533	-11%