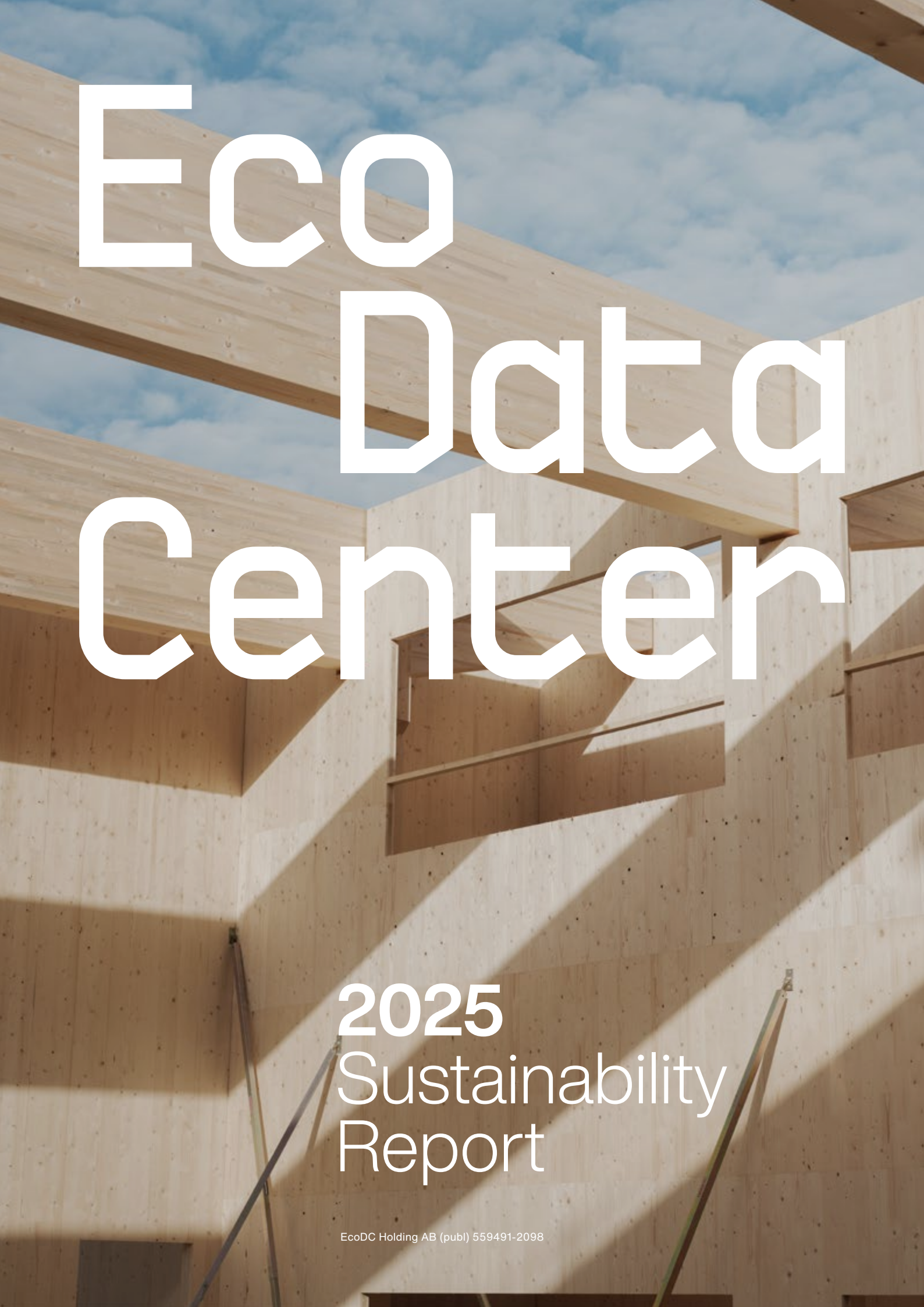


Eco Data Center

2025 Sustainability Report

EcoDC Holding AB (publ) 559491-2098

Our belief –
Power Progress

Digital infrastructure is becoming a driving force behind some of the most important advancements of our time. From enabling medical breakthroughs through high performance computing to improving how we understand climate patterns with AI, it is shaping how progress happens. At the center of this revolution are data centers, now critical infrastructure for both global progress and local economies. Datacentersa are quickly becoming the digital backbone for country's competitiveness and innovation. As demand for computing power grows, so does the responsibility to ensure that digitalization develops in a sustainable and meaningful way.

At EcoDataCenter, we believe data centers should do more than enable digital growth, they should actively contribute to a better future. By rethinking how data centers are designed and integrated, we can unlock new value not only for the digital ecosystem, but for society as a whole.

We believe a data center should not exist in isolation. When integrated into the local community, it can support surrounding industries, create skilled jobs, and contribute to more resilient energy systems. Excess heat can be reused, renewable energy can be shared more efficiently, and infrastructure can strengthen both digital and physical ecosystems.

For us, this is how digital infrastructure should evolve. Not only as a foundation for innovation, but as a force that drives sustainable development and ensures that the benefits of digitalization are widely shared.

Table of contents

CEO foreword

As demand for digital infrastructure grows, we must lead the way in responsible growth that minimizes environmental impact and creates long term value for stakeholders and society.

Digital transformation is accelerating rapidly, and AI is driving unprecedented demand for computing capacity. This creates both new opportunities and new responsibilities, raising expectations on how data centers are designed, built, and operated.

As demand for digital infrastructure grows, we must lead the way in responsible growth that minimizes environmental impact and creates long term value for stakeholders and society. At EcoDataCenter, we are addressing this challenge by pioneering new sustainability solutions while ensuring that digital infrastructure is built for the future. Our sustainability strategy is deeply embedded in our business strategy and guides both our long term decisions and how we manage our environmental and social impacts.

We recognize that data centers can have significant impacts on climate, energy systems, water resources, and local communities, and we are committed to managing these impacts responsibly as we grow.

I am pleased to see that we are on track to deliver according to the strategy we set out in 2024, built on three key pillars.

Responsible Digitalization. We uphold high ethical standards, ensure transparency, and actively manage environmental and social risks across our value chain. We say
no to unsustainable workloads such as crypto and strictly comply with laws and industry regulations.

Reducing Pressure on Nature. We are phasing out fossil fuels in our backup power systems to use less than 1 percent fossil-based energy by 2028, a goal we have achieved, both 2024 and 2025. Our continued use of cross-laminated timber in construction significantly reduces embedded carbon, setting a new standard for sustainable data center design. As liquid cooling becomes more common in our facilities, we see growing opportunities to expand heat reuse and further integrate our infrastructure with local energy systems. In addition, we are on track to eliminate our dependence on groundwater for cooling by 2028.

While some of our targets, such as recovering more than 90% of waste, have not been met in 2025, we remain committed to closing the gap. When unexpected events occur, such as in site development, we take responsibility, act transparently, and continuously improve our processes and environmental safeguards.

Caring for People. We prioritize local job creation when developing new sites, maintain a strong focus on human rights across our value chain, and uphold labor rights in accordance with the Swedish labor market model. We actively work to improve diversity, support parental leave, and ensure the right to collective bargaining for all employees.

To scale at the pace the industry demands while delivering on our sustainability commitments is no small task. However, we believe digital infrastructure must evolve responsibly, balancing performance, efficiency, and environmental impact. We also engage in continuous dialogue with customers, communities, partners, and authorities to ensure our expansion supports long-term societal value.

Transparency is essential to making real progress. This sustainability report marks an important milestone, enabling us to share our achievements, acknowledge our challenges, and set ambitious targets for the future. Through innovation and collaboration, we remain committed to ensuring that our data centers are both high-performing and as sustainable as possible.

Peter Michelson – CEO

’25 at a glance

Environmental progress

Recognised sustainability efforts

Carbon Usage Effectiveness (CUE)

50% reduction in impact vs. 2024 – leading the industry in carbon efficiency.

1.17 g CO_2e/kWh

Groundwater withdrawal

A 47% percentage reduction from 2024 – moving towards zero groundwater for cooling.

28%

Electricity in operations

Fossil-free electricity in operations.

100%

First liquid-cooled NVIDIA GB200 deployment in Europe

Enabling active heat reuse through direct-to-chip cooling.

1st

Certifications & recognitions

ECOVADIS TOP 1%, AUG 2025

CDP CLIMATE SCORE B, 2025

Local impact & responsible business

Recognised commitment to quality, sustainability and information security

Capital expenditure invested locally

Up from 55% in 2024, driving economic growth in the local region.

58% 1,355 MSEK

Weighted customer NPS

Benchmark: 45

80

Employee satisfaction

Target: 80

81

Community investment

Powering movement and progress in our local communities through our initiative Powering Communities.

2 MSEK/year

Certifications & recognitions

ISO 14001

ISO 27001

ISO 90001

Our history

2012	The concept of a circular data center system began to evolve in Falun in collaboration with the local energy utility company.
2014	EcoDataCenter was formally established.
2019	EcoDataCenter 1 in Falun entered into operation.
2020	BMW Group became a key customer, validating the company's circular and sustainable design approach.
2021	DeepL became a customer. An investment of EUR 100 million supported the expansion of EcoDataCenter 1, with increased focus on low-carbon construction, including wooden structures.
2022	EcoDataCenter introduced monthly Scope 3 emissions reporting to customers and received international recognition for its sustainability performance.
2023	Together with its owner Areim, EcoDataCenter raised over EUR 600 million to accelerate growth and invested EUR 200 million in expanding the Falun campus.
2024	EcoDataCenter partnered with CoreWeave to deliver one of Europe's largest AI compute clusters. Acquistion of our new site in Borlänge with at least 250 MW power capacity and issued SEK 1 billion in senior unsecured bonds to finance further expansion.
2025	Construction begins at EcoDataCenter 2, Borlänge, with the first data center at the site scheduled for completion in early 2027.
	EcoDataCenter Sustainability performance was once again recognized with a Platinum EcoVadis rating and the highest CDP SME score.
	EcoDataCenter together with its owner Areim raised additional EUR (450+600) Million in new fundings during the year.
2026	EcoDataCenter and MistralAI Partner to Build large-scale AI-focused Data Center.

Risk or opportunity?

AI infrastructure in a Nordic context

→→ Digitalization and AI are driving a structural increase in DC infrastructure, scaling at unprecedented pace. As demand for computing capacity accelerates, data centers are facing increasing scrutiny from regulators, investors, and local communities regarding environmental impact and societal value. The climate footprint of digital infrastructure is increasingly determined not only by efficiency, but by where and how facilities are built and powered.

The carbon intensity of electricity varies significantly depending on national energy systems.[1] In this context, Sweden and the Nordic region offer favorable conditions for sustainable data center operations, with one of the highest shares of renewable electricity in the EU and a largely fossil-free power mix. The Nordic climate also enables extensive use of free cooling, reducing the need for energy-intensive mechanical cooling systems. Sweden has one of the highest shares of renewable electricity generation within the European Union, contributing to a largely fossil-free electricity system with comparatively low carbon intensity.[2] In addition, the Nordic climate enables extensive use of free cooling, reducing reliance on energy-intensive mechanical cooling systems.

At EcoDataCenter, we view this shift as an opportunity to redefine what data centers can be. We deliberately avoid energy-intensive activities such as cryptocurrency mining, prioritize low-carbon construction including wood-based building solutions, capture and reuse waste heat, and design facilities to achieve best-in-class energy efficiency.

By combining energy-efficient design, renewable electricity sourcing, and waste heat recovery within a low-carbon power system, we help our customers significantly reduce greenhouse gas emissions. In our assessments, our approach can deliver up to a 98% reduction in customer GHG emissions compared to a typical data center operating on the central European power mix. ←←

1. **CO_2 intensity of electricity generation in selected regions. 2015-2026: https://www.iea.org/data-and-statistics/charts/co2-intensity-of-electricity-generation-in-selected-regions-2015-2026**
2. **Eurostat, Electricity production by source (dataset). https://ec.europa.eu/eurostat/databrowser/view/nrg_bal_peh/default/table**

Our company

EcoDC Holding AB (publ.), referred to as EcoDataCenter, is a Swedish-based group of companies that design and operates data centers in Sweden. We are Swedish pioneers aiming to be the Nordic region's leading low-carbon and secure data center solutions provider.

We are a quickly growing company. During 2025, our operations in Falun continued to expand, while we also initiated the development of our second site, EcoDataCenter 2 in Kvarnsveden, Borlänge with a power capacity of at least 240 MW. With the commissioning of our newest Data center 1D in Falun, our total installed capacity reached over 45 MW in 2024. The overall site has a power capacity of 80 MW, and the two final data centers (total 24 MW) are under construction.

All our clients rely heavily on the services we provide. When choosing EcoDataCenter as their colocation provider, security, redundancy, and sustainability have been at the core of many of our clients' priorities.

From our site in Falun, our clients can serve their customers in Sweden, Europe, and globally, depending on their specific demands. The characteristics (such as latency, data sovereignty, full stack requirements, hardware configuration, and rendering time) of their product decide what market they serve and how often the client needs to interact with their hardware.

Our clients vary drastically in terms of size, global presence, country of origin and what service or product they provide, which means the complexity of their organizations, as well as their supply chain and activities therein, are a cross-section of modern businesses. Whether it is complex computations that are run, sensitive data that is stored, or the ability to provide services 24/7/365 from our data halls, having a reliable data center partner is considered a crucial part of our clients' value chain. Since we design and build our own data centers, our upstream supply chain activities can be described as more project-based than typical goods-producing companies. We offer Remote-/Smart Hands services to support our customers, or if they choose, they have their own personnel either stationed on site or visiting.

EcoDataCenter primarily provides data center services and does not rely on continuous raw material purchases. Instead, it occasionally procures key infrastructure components, such as electronics, backup generators, HVAC systems, and construction materials, mainly from Swedish suppliers. These goods support the development and operation of data centers. Construction materials like wood, concrete, and steel are locally sourced where possible. Most equipment is manufactured in Sweden or Europe, in line with European standards, although electronic components often involve complex global supply chains and materials like rare earth metals. Local contractors are used for data center construction as far as possible. The company also purchases significant amounts of electricity and water.

EcoDataCenter's downstream value chain is characterized by its core business of selling data center services to customers in Sweden and globally. EcoDataCenter also sells waste heat from its data centers as an additional circular revenue stream. More information about the supply chain can be found in the section "Our supply chain".

Between 2022 and 2025, there were no significant changes in EcoDataCenter's core business activities, value chain, or supply chain. However, the construction of a new data center did affect the supply chain and procurement activities related to selecting new contractors and suppliers. Also, the divestment of the two sites Stockholm and Piteå in 2025 has led to more focused business activities. We started operating a new data center building in Falun, Data center 1D, during 2025.

Power Progress

EcoDataCenter is designed to be more than data centers. Our ambition is to power progress throughout our entire ecosystem – from how we source energy and construct our buildings, to how we create jobs, develop skills and support everyday life in Dalarna, where we operate. By integrating our operations with surrounding infrastructure, industries and communities, we work to ensure that the value created inside our facilities is shared far beyond their walls.

EcoDataCenter

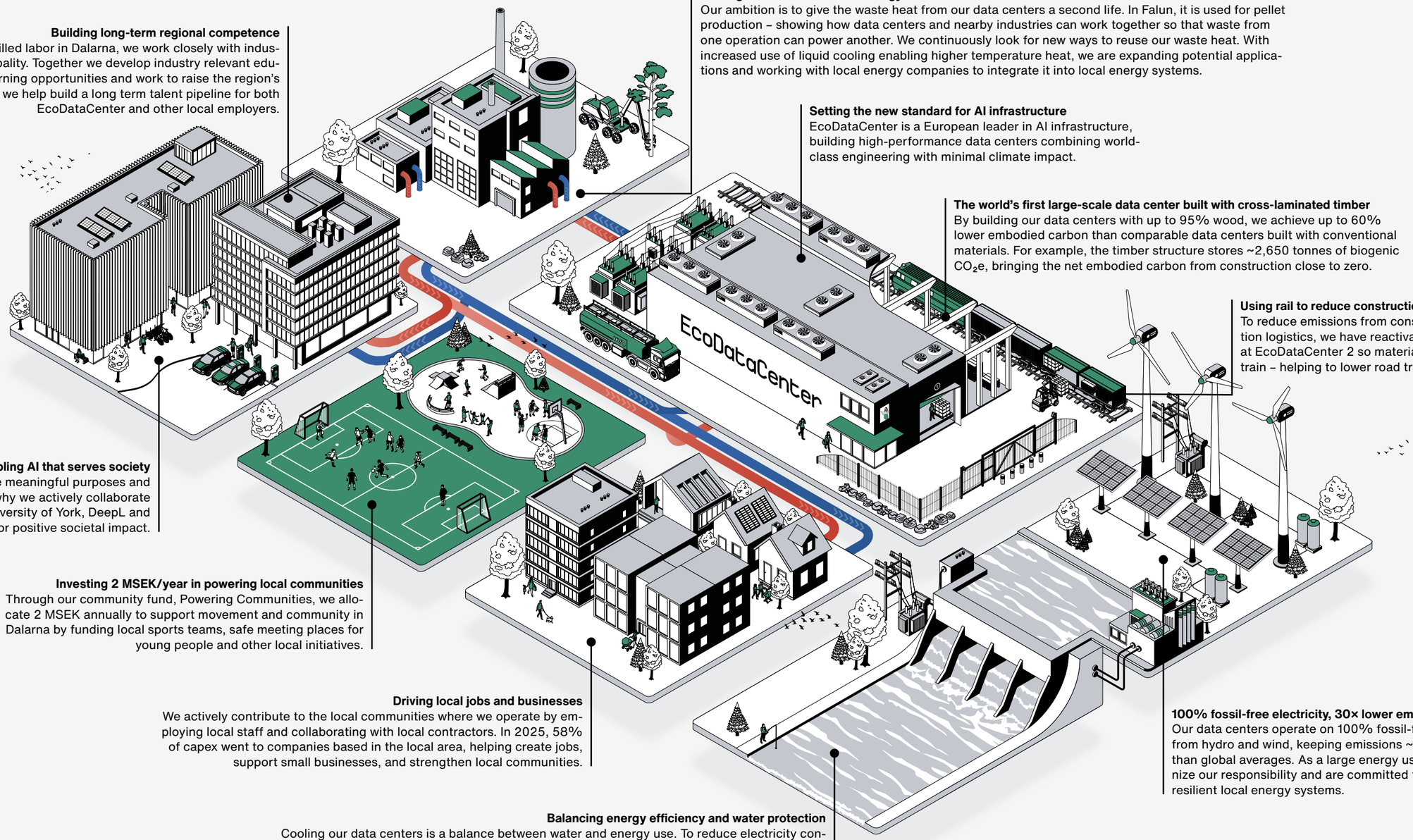
Building long-term regional competence
To strengthen access to skilled labor in Dalarna, we work closely with industry, schools and the municipality. Together we develop industry relevant education, offer workplace learning opportunities and work to raise the region's attractiveness. In this way, we help build a long term talent pipeline for both EcoDataCenter and other local employers.

Turning waste heat into new energy
Our ambition is to give the waste heat from our data centers a second life. In Falun, it is used for pellet production – showing how data centers and nearby industries can work together so that waste from one operation can power another. We continuously look for new ways to reuse our waste heat. With increased use of liquid cooling enabling higher temperature heat, we are expanding potential applications and working with local energy companies to integrate it into local energy systems.

Setting the new standard for AI infrastructure
EcoDataCenter is a European leader in AI infrastructure, building high-performance data centers combining world-class engineering with minimal climate impact.

The world's first large-scale data center built with cross-laminated timber
By building our data centers with up to 95% wood, we achieve up to 60% lower embodied carbon than comparable data centers built with conventional materials. For example, the timber structure stores ~2,650 tonnes of biogenic CO_2e, bringing the net embodied carbon from construction close to zero.

Using rail to reduce construction emissions
To reduce emissions from construction and construction logistics, we have reactivated the former railway at EcoDataCenter 2 so materials can be delivered by train – helping to lower road transport volumes.



Enabling AI that serves society
We want our capacity to serve meaningful purposes and power global progress. That's why we actively collaborate with customers such as the University of York, DeepL and Green AI, using digitalization for positive societal impact.

Investing 2 MSEK/year in powering local communities
Through our community fund, Powering Communities, we allocate 2 MSEK annually to support movement and community in Dalarna by funding local sports teams, safe meeting places for young people and other local initiatives.

Driving local jobs and businesses
We actively contribute to the local communities where we operate by employing local staff and collaborating with local contractors. In 2025, 58% of capex went to companies based in the local area, helping create jobs, support small businesses, and strengthen local communities.

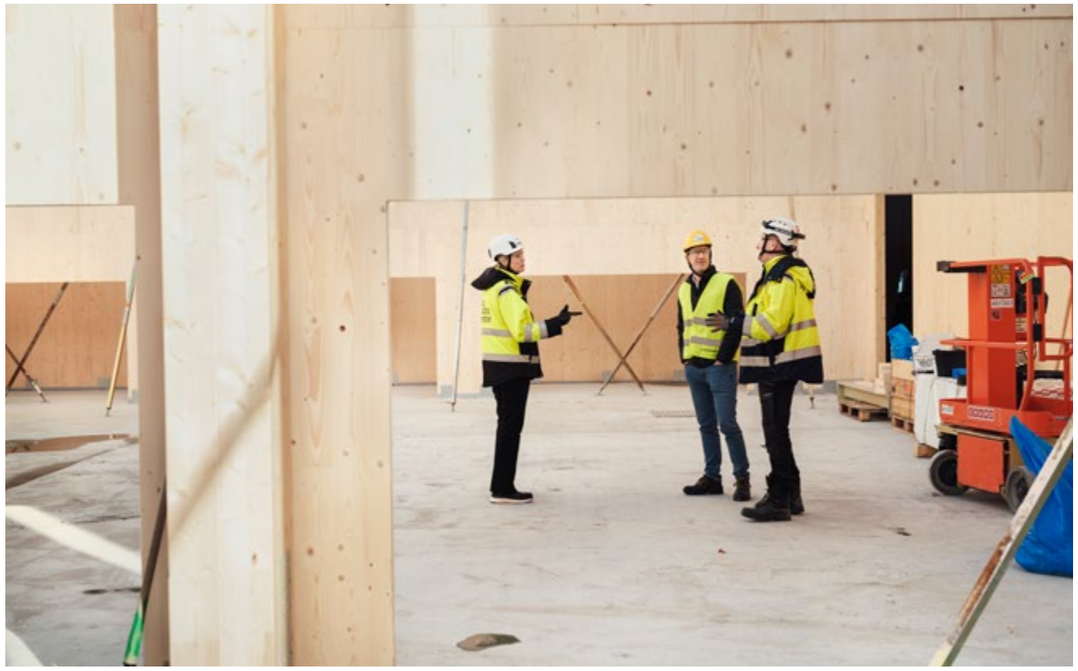
Balancing energy efficiency and water protection
Cooling our data centers is a balance between water and energy use. To reduce electricity consumption, we use adiabatic cooling, which uses water to improve efficiency while allowing us to reduce water use during drought or shortages. Water is a precious resource, and we aim to avoid groundwater for cooling. We are transitioning to non potable surface water in Falun, with a commitment to eliminate groundwater use by 2028.

100% fossil-free electricity, 30× lower emissions
Our data centers operate on 100% fossil-free electricity from hydro and wind, keeping emissions ~30× lower than global averages. As a large energy user, we recognize our responsibility and are committed to supporting resilient local energy systems.

Governance and sustainable business practices

EcoDataCenter was founded based on a vision of being the most sustainable data center company in the world. This means that sustainability has been embedded in our DNA, decisions, and business processes such as marketing, sales, design, procurement, and operations from the start.

Over the years, it has become more formalized. EcoDC Holding AB (publ) is a group of Swedish companies where each data center forms their own company under the umbrella of EcoDC Holding AB (publ). Our headquarters are in Falun, Sweden. All our sites are in Sweden. We have one operational site in Falun, and one under construction in Kvarnsveden Borlänge. During 2025, we divested our smaller sites in Stockholm and Piteå. These data centers were divested by mid 2025, meaning June 30, 2025. Since March 2025, we have rented a smaller office in Stockholm, which is included in our reporting. Our owners are Areim, an independent Nordic fund manager and property owner. Corporate governance at EcoDataCenter is governed by the Swedish Companies Act.



The board of directors

The Board of Directors is responsible for decision-making and for overseeing the management of EcoDataCenter's impact on the economy, environment, and people. The Board sets the company's strategic direction and ensures that sustainability impacts and risks are integrated into decision-making.

The Board holds ultimate responsibility for EcoDataCenter and approves all significant matters, including management agreements, sustainability strategy, objectives, policies, budgets, targets, risk limits, and reporting. The Board also appoints the CEO, who is responsible for developing and updating the company's purpose, values, mission, strategies, policies, and sustainable development goals, subject to Board approval. The CEO participates in Board meetings.

The Board oversees performance through ongoing reporting of KPIs, including sustainability KPIs, covering impacts on the economy, environment, and people. Pre-defined KPIs are reported quarterly, supplemented by updates from management on sustainability initiatives. Certain reporting is provided annually, such as the employee satisfaction index.

To strengthen competence in sustainable development, the Board has regular ESG and regulatory discussions and introduced internal training courses. The Board reviewed and approved this sustainability report, including the material topics informing the sustainability strategy, objectives, and controls. A draft report was provided to the Board, followed by a presentation of the limited assurance results a few weeks later.

Conflicts of interest

Potential conflicts of interest are assessed prior to the appointment of new Board members, including review of external engagements. Board members are required to act in the best interest of shareholders and disclose any potential conflicts of interest. Where a conflict arises, the relevant member is expected to abstain from related discussions and decisions to ensure impartiality.

Disclosures such as related party transactions are included in the annual report, which is signed by the Board. There is no cross-shareholding with suppliers among Board members.

The composition of the board

The Board comprises experienced industry leaders, representing different ages, genders, and nationalities. No minorities, stakeholders, or executives from the company are represented on the board. The board's competences cover the Nordic real estate market, infrastructure, and private equity and capital markets as well as telecommunication, IT, and the data center market. Leif Andersson, the founder, and chairman of our owners Areim, serves as the Chair of the Board of EcoDataCenter. He does not hold a senior executive position within EcoDataCenter. During 2025, one new board member joined the board, which consists of six people. Below is an overview of the board members, their experience, and commitments.

Leif Andersson

Significant commitments outside of EcoDataCenter
Leif Andersson is the sole founder of Areim and serves on the Board of Directors. He works actively with fundraising and transactions. Leif is also one of three voting members of the Investment Committee for Areim DC Fund as well as one of four voting members of the Investment Committee for Areim's flagship fund series.

Competencies
Has more than 30 years of experience in the real estate industry. Before founding Areim in 2003, Leif worked as the Head of Investments at AP Fastigheter.

Independence or dependence
Dependent

With the board since date
2019-09-13
2024-03-15 (Chair)

Erik Bertman

Significant commitments outside of EcoDataCenter
CEO Conscia full time role Chairman of Djursholms Country Club.

Competencies
25 years of experience and expertise in telecommunication and IT. Worked at EQT, E.ON, and COO at Microsoft Sweden.

Independence or dependence
Independent

With the board since date
2023-07-06

Johan Dettel

Significant commitments outside of EcoDataCenter
Senior advisor to Areim. Voting member of the Areim DC Fund IC. Serving on the board at Iver.

Competencies
15 years of experience in private equity and capital markets, focused on the TMT sector. Most recently, Johan was a partner at EQT where he acted as an investment advisor to the EQT funds and as a board member in several investments, including Iver, IP-Only, Adamo and Epidemic Sound.

Independence or dependence
Dependent

With the board since date
2022-05-20

Mårten Mickos

Significant commitments outside of EcoDataCenter
Executive in Residence at Aalto University. Board of directors at NestAI.

Competencies
Extensive CEO experience in global technology companies, including scaling MySQL into a European unicorn; cybersecurity leadership at HackerOne; former board member at Nokia; long-standing presence in the Silicon Valley technology ecosystem.

Independence or dependence
Independent

With the board since date
2025-05-12

Robert Björk

Significant commitments outside of EcoDataCenter
Investment & Fund Manager for the Areim DC fund. Responsible for Areim's DC platform and the DC fund, including implementing its investment strategy and fundraising activities. Full time role.

Competencies
Prior to his role at Areim, Robert was at PwC Corporate Finance and VL Kempen Investment Banking.

Independence or dependence
Dependent

With the board since date
2024-10-09

Alex Lukesch

Significant commitments outside of EcoDataCenter
Head of European Investments at Madison International Realty. Full time role.

Competencies
19 years of experience in financial markets and real estate. Before joining Madison, Alex worked at Lincoln Property Company and Corus Bank.

Independence or dependence
Dependent

With the board since date
2023-07-06

Election and Evaluation of the Board
(GRI 2-9, 2-10, 2-18, 2-19)

The Board of Directors is elected through an election committee process and appointed by shareholders at the Annual General Meeting (AGM) in accordance with the Swedish Companies Act (Aktiebolagslagen). The principal owner reviews the competencies required for the Board, and based on this review, Board members may be added or replaced to support the company's expansion and strategic direction. Areim, as the primary owner, promotes diversity, inclusion and equality, ensuring equitable treatment regardless of gender, nationality, age, or background.

The Board is evaluated annually by the shareholders through the AGM. The AGM decides on discharge from liability (ansvarsfrihet) and, if deemed in the company's best interest, the Board may be re-elected for an additional year. Board members may also be replaced through an Extraordinary General Meeting if supported by a majority vote. The Board is evaluated annually to ensure it maintains the appropriate competencies to fulfil its responsibilities, including ensuring the company reduces negative environmental impacts from its activities.

Remuneration of the Board and Executive Management
(GRI 2-20, 2-21)

Dependent Board members are not remunerated for their Board positions. Independent Board members receive fixed remuneration at market level for a company of similar size and industry. Board members who are not employees of the main owner receive fixed compensation and are also offered the opportunity to invest in the company through a long-term incentive program. No other remuneration is provided.

Board remuneration is decided by shareholders at the AGM. The Board decides the CEO's remuneration, and the CEO decides remuneration for the executive management team. Each decision-making body is responsible for maintaining remuneration at market levels.

Executive Management Responsibilities and Sustainability Governance
(GRI 2-9, 2-12, 2-13, 2-14)

EcoDataCenter's CEO is responsible for day-to-day operations in accordance with the Board's guidelines and instructions. The executive management team supports the CEO and consists of nine members (excl CEO), of whom one is women. The team has extensive senior experience across technology, IT, finance, and real estate in Swedish and international companies.

The executive management team is responsible for developing and updating the organization's purpose, values and mission statements, strategies, policies, and goals related to sustainable development. Management is responsible for developing and approving sustainable development strategies and targets. The strategies and targets were finalized by management in February 2025 and anchored with the Board in March 2025.

Sustainability is represented in the executive management team through the CERSO (Chief External Relations and Sustainability Officer). Management engages directly with stakeholders to ensure that processes are followed and monitored. →→

→→ EcoDataCenter follows a yearly planning cycle and continuously monitors key KPIs and projects. In accordance with ISO management standards, an annual management review is conducted where sustainability topics are assessed, and yearly environmental and other targets are established. Outcomes are aligned with the sustainability strategy and evaluated based on predefined KPIs. In addition, quarterly executive reviews are conducted to assess performance against sustainability targets.

Remuneration is not linked to sustainability performance, but sustainability is considered an integral part of senior executive managers' responsibilities.

Executive Remuneration and Employment Conditions
(GRI 2-19, 2-20, 2-21)

EcoDataCenter does not currently have a bonus scheme. Executive managers are offered the possibility to invest in shares through a long-term incentive program. All managers receive fixed monthly salaries. All payments related to employee terminations follow collective bargaining agreements. Outstanding vacation is paid out upon termination. EcoDataCenter does not currently apply clawback provisions.

Retirement benefits are provided according to collective bargaining agreements. All executive managers are locally based in Sweden around key operational locations (Falun, Borlänge, Stockholm) and are recruited from local communities. Most of the executive management team is based in the Stockholm area, with additional members from Falun/Borlänge.

Our material topics

Materiality assessment

Material topics represent the sustainability topics that are most significant to EcoDataCenter from both a sustainability and business perspective. Our materiality assessment is conducted in accordance with the GRI framework and informed by ESRS, applying a double materiality approach.

Process to determine material topics

In 2025, EcoDataCenter conducted an annual review of its material topics to confirm their continued relevance and reflect evolving stakeholder expectations and regulatory developments.

As part of the 2025 review, we refined the structure of our material topics by separating Energy Use and Greenhouse Gas Emissions, to better reflect their individual importance and management focus, while recognizing their close connection.

We will continue refining our understanding of key issues to focus on what matters most to our stakeholders, our business, and society.

Material topics guiding strategy

When assessing impacts, risks, and opportunities, we considered the full value chain. The resulting material topics inform EcoDataCenter's sustainability strategy, including targets to reduce negative impacts, increase positive impacts, mitigate risks, and leverage opportunities. Further information on our impacts, risks, opportunities, and management approach is presented in the Materiality table and related sections later in this report.

Lessons learned and review of material topics

The annual materiality assessment process was initiated in 2023 and has been continuously reviewed and refined, including during 2024 and 2025. This work has strengthened the clarity of our strategic priorities and serves as a basis for KPI development and goal setting.

As a result of this work, we have initiated programs and policy refinements, including goals to finalize our updated supplier ESG assessment process and our commitment to work strategically on low-emission design to address scope 3 emissions.

A challenge has been assessing impacts, risks, and opportunities in a comparable way across the full ESG spectrum, as quantification remains difficult due to inconsistencies in underlying data availability and quality. Going forward, we will continue improving comparability between qualitative and quantitative assessments.

Material topics ↘	Environment					Social			Governance			
	GHG Emissions	**Energy use & waste heat**	**Water use**	**Waste**	**Biodiversity**	**Local communities & Stakeholders**	**Attraction and retention of talent & Diversity**	**Health and safety**	**Social impact from use of data**	**Ethics and responsible business**	**Compliance with legislation and standards**	**Supply chain risks and impact on environment and human rights**
Positive impact (potential/actual)		Waste heat reuse enabling the decarbonization od heaitng networks	Strengthening water infrastructure and enabling secure water supply. Progressive improvement in water use shown via monitoring of WUE.	Use of materials and generation of waste during construction. Promoting improved reuse of building materials	Potential positive impact upstream in supply chain.	Contracting Swedish contractors and offering apprenticeships.	Satisfied employees according to employee survey.	Health and safety incidents management.	Indirectly helping society to develop through digitalization.	No cryptocurrency as an integrity.		Opportunity to use local contractors with high standards.
Negative impact (potential/actual)	Use of diesel for backup generators.	Usage of large quantities of electricity.	Use of ground water for cooling; climate change impact.	Downstream generation of e-waste.		Risk related to temporary foreign labor.	Low diversity affecting overall business negatively		Negative impact from use of data with high-risk customers.	Risk of corruption and bribery.		Risks including forced labor, child labor, pollution.
Opportunity	Building low impact digital, AI infrastructure	Opportunity to support local energy systems with recovered waste heat	Reduce energy use through cooling water.	Help customers reuse servers.	Increase biodiversity on sites.	Upskilling the local workforce. Develop rural areas and grow as Swedish company.				Access to powered land as local company.	Strong compliance management strengthens customer trust, enables engagement with regulated industries, and supports long-term business resilience.	
Risk		Risks related to power availability and reputation being a large power consumer (transitional climate risks).	Water scarcity and climate change.		Risks related to site selection.	Risk of not gaining social acceptance. Potential increase in local resource prices for taxpayers.	Risk of not attracting enough diverse pool of talent. Risk of fast growing workforce	Risk of incidents and injuries.	Reputational risks from customer data use.	Risk of not accessing powered land if not managed properly	Non-compliance may impact individuals' privacy, disrupt customer operations, result in regulatory sanctions and reputational damage.	Reputational risks in supply chain.
Management approach	Monitoring and reduction of emissions in line with the GHG Protocol. Measures include improving energy efficiency, increasing renewable energy use, and managing significant emitters in Scope 1,2 and 3.	Energy impacts managed through policies and commitments focused on improving efficiency, and increasing renewable energy sourcing. Actions include monitoring energy use, implementing efficiency measures, and engaging with stakeholders to support development of energy grid.	Water use is managed through operational controls and technical solutions to minimize consumption and avoid the use of potable water for cooling. KPI monitoring is in place, with improvement strategies to move away from groundwater use and increase water efficiency.	Waste is managed through operational controls and supplier requirements to minimize waste generation and increase material recovery. KPI monitoring and contractor reporting are in place, with improvement measures to strengthen sorting practices and increase the share of recovered waste towards 90%.	Biodiversity is managed through site selection processes, Environmental Impact Assessments, and compliance with environmental permits to avoid and minimize negative impacts. Additionally, we quantify and compensate biodiversity impacts per site. Monitoring and mitigation measures are implemented where risks are identified, supported by external expertise as part of the development process.	Local community impacts, including effects on the local energy system, are managed through continuous stakeholder dialogue and analytical work to assess and understand potential local impacts. Findings are integrated into project planning and business practices. Local communities benefit from DC establishment through work with local suppliers, universities, and schools. Progress is monitored through stakeholder feedback and management follow-up.	Managed through HR policies on recruitment, equal opportunity, and competence development. Performance is monitored through employee engagement, gender/age representation, training hours etc. Progress is reviewed annually and used to update targets and action plans.	Managed thorugh guidelines, risk assessments, and preventive measures, and is integrated into decision-making processes. The health and safety manual describes the overall approach. Performance is monitored through work-related injuries, incidents, and near misses, with goals and KPIs in place and quarterly follow-up from 2026.	Managed through policies and procedures for data privacy, information security, and responsible customer engagement across our value chain. Requirements are integrated into customer and supplier due diligence, contractual terms, and operational controls.	Anti-corruption and anti-competitive behavior are managed through policies, internal controls, and a Code of Conduct to ensure ethical business practices and compliance with applicable laws. Training and compliance processes are in place, supported by reporting channels and follow-up procedures.	Compliance with legislation and standards is managed through governance structures, policies, and internal controls to ensure data protection, information security, and operational resilience. Performance is monitored through audits, incident reporting, and regular compliance reviews.	ESG requirements are integrated into supplier selection, onboarding, and follow-up processes. Supplier performance is assessed through ESG criteria and risk-based evaluations. Progress is monitored through supplier assessments and management follow-up and used to strengthen requirements and mitigation actions over time.
Goals	• Operational emissions CUE -70% 2028 vs 2022 (< 1.5 g CO2e/kWh). • Reduce Scope 3 emissions intensity (embodied CO_2e/MW installed) via supplier collaboration and improved value-chain data quality. • Refrigerants GWP<675 in all new data centers.	• >99% fossil free operations by end of 2028. • 100% renewable electricity. • Active waste heat reuse solutions at all sites by 2028.	No ground water used for cooling by 2028.	Divert >90% of total waste from disposal by 2028.	Map, reduce and compensate negative Biodiversity impact for all operational sites.	• Apprenticeships in our own operations and across all our sites for construction works. • Maintain Customer satisfaction above 80	• Sustain high employee engagement levels by reaching above 30 ENPS (-100 to 100) by end of 2026. • Gender: > 20% women in the company end of 2028. • Age: > 30% above 50 years end of 2028.	Third-party validation of OHS system according to ISO 45001 certification by end of 2026.	Zero tolerance for crypto currency activities.	• Zero tolerance for unethical behavior in own operations and value chain. • Ethics training and supplier code of conduct signed by all suppliers.	• Implemented procedures to comply with legislation. • Third-party validation of our sustainability data and performance through EcoVadis, CDP, and ISO 14001 certification.	• 100% of critical suppliers assessed via a structured, tool-enabled supplier sustainability framework by end of 2026. • Zero tolerance for illegal workforce.
GRI indicators related	GRI305	GRI103	GRI303	GRI306	GRI101	GRI 413 , GRI 204, GRI 412	GRI405	GRI403	GRI 418; GRI 2-5	GRI205; GRI206	GRI418; GRI2	GRI204; GRI308; GRI407; GRI414

Stakeholder expectations

Through ongoing dialogue with owners, customers, suppliers, employees, municipalities, and partners, we identify key expectations regarding how EcoDataCenter manages its impact.

Environmental expectations are central. Stakeholders expect renewable energy sourcing, low carbon intensity (low CUE), and high energy efficiency (low PUE), supported by proactive management of greenhouse gas emissions. There is an increasing focus on climate-related and water-related risks, waste reduction targets, and biodiversity considerations. Innovation and technology are expected to drive sustainable infrastructure development.

Social expectations include contributing to local employment and regional development, maintaining strong social acceptance, and avoiding temporary foreign labor. Stakeholders also expect a safe and healthy work environment for both employees and contractors, including physical and psychological safety, as well as continued commitment to diversity and equal opportunity.

Governance expectations emphasize responsible business conduct. Stakeholders expect robust customers and supplier due diligence, low-risk partnerships, zero-tolerance for corruption, compliance with new and existing legislation, and a clear position against energy-intensive cryptocurrency mining.

These engagements and regular feedback from the stakeholders inform our actions as well materiality assessment, sustainability strategy, and target setting. Read more in section: Stakeholder engagement.

Our sustainability strategy and goals

We aim to be front-runners

Digitalization and AI are increasing pressure on the environment and society. As the backbone of digitalization, data centers have a responsibility to lead the transition toward more sustainable solutions. We aim to be front-runners by minimizing environmental impact, creating social value, and inspiring customers, suppliers, and peers to raise industry standards.

We build data centers powered by renewable energy and designed to support thriving local communities. Together with our stakeholders, we have identified our material topics, areas where we have significant environmental, social, economic, and financial impact. These topics form the foundation of our sustainability strategy and targets across environmental, social, and governance (ESG) areas.

Reduce pressure on nature
Environment

→ We aim to operate digital infrastructure with the lowest possible impact on nature by reducing lifecycle carbon emissions and managing climate-related risks across construction and operations.

Our operations are based on fossil-free electricity, and we work to reduce emissions from cooling systems, materials, and infrastructure. We treat electricity and water as shared resources, focusing on efficiency, resilience and responsible use while enabling solutions such as waste heat reuse and minimizing impacts on biodiversity.

Care for people
Social

→ We aim to create a safe, inclusive and engaging workplace built on respect, equal opportunity and responsible labor practices. We focus on strong health and safety, high employee engagement and continuous development of our people.

We prioritize local employment and work closely with contractors and communities around our sites to support safe working conditions, responsible construction practices and long-term regional value creation. We uphold human rights and labor rights in line with the Swedish labor market model.

Responsible digitalization
Governance

→ We work to ensure that digital infrastructure is developed and operated responsibly through strong governance, ethical business conduct and full compliance with laws and industry regulations.

We actively manage environmental and social risks across our supply chain through structured supplier engagement, transparency and sustainability reporting. We also consider the sustainability implications of the digital workloads we support.

Transparency and governance

Transparency is key for credibility and credibility is fundamental for sustainability. We will measure and disclose our sustainability performance on our website, in the present and future annual sustainability reports, and on the CDP reporting platform. Since the company was founded, sustainability has been part of everything that we do, how we think, and the decisions we make every day.

The executive management team oversees the strategy, delegating tasks and embedding it into relevant processes. Our sustainability strategy is integrated into existing company processes, including procurement, enterprise risk management, and ISO standards (9001 and 14001), ensuring consistent management of risks, opportunities, impacts, KPIs, and controls. Throughout the development of our sustainability strategy, staff and management actively participate to understand the impact of our targets. Additionally, we have introduced sustainability training for all employees as part of our onboarding process, ensuring that everyone is aligned with our sustainability goals.

Material topic goals overview

Ethics and responsible business		**Water use**	No ground water used for cooling by 2028	
Compliance with legislation and standards	Implemented procedures to comply with legislation	**Waste**	Zero tolerance for unethical behavior in own operations and value chain	Ethics training and supplier code of conduct signed by all suppliers
Social impact from use of data	**GHG Emissions**	Third-party validation of our sustainability data and performance through EcoVadis, CDP, and ISO 14001 certification	Divert >90% of total waste from disposal by 2028.	**Attraction and retention of talent & Diversity**
Zero tolerance for crypto currency activities	Operational emissions CUE -70% 2028 vs 2022 (< 1.5 g CO_2e/kWh)	Gender: > 20% women in the company end of 2028	Sustain high employee engagement levels by reaching above 30 ENPS (-100 to 100) by end of 2026	**Energy use & waste heat**
Reduce Scope 3 emissions intensity (embodied CO_2e/MW installed) via supplier collaboration and improved value-chain data quality	Age: > 30% above 50 years end of 2028	**Supply chain risks and impact on environment and human rights**	>99% fossil free operations by end of 2028	**Local communities & Stakeholders**
Refrigerants GWP<675 in all new data centers	100% of critical suppliers assessed via a structured, tool-enabled supplier sustainability framework by end of 2026	**Health and safety**	100% renewable electricity	Apprenticeships in our own operations and across all our sites for construction works & Maintain Customer satisfaction above 80
Biodiversity	Map, reduce and compensate negative Biodiversity impact for all operational sites	Zero tolerance for illegal workforce	Third-party validation of OHS system according to ISO 45001 certification by end of 2026	Active waste heat reuse solutions at all sites by 2028

Governance
Responsible digitalization

We are committed to driving a more sustainable digital ecosystem by combining innovation, reliability, and strong ethical standards. Our ambition is to deliver secure, competitive, and sustainable data center services while creating long-term value for society.

We operate with transparency and zero tolerance for unethical behavior across our value chain, partnering with stakeholders who share our values. Based in Sweden and guided by stringent environmental and labor regulations, we comply with stakeholder requirements and continuously improve through our ISO 9001, 14001, and 27001 certifications.

Performance against targets
During 2025, more information security events occurred than ever before, which is in line with the current threat landscape. To ensure full transparency, we have implemented new processes of recording information security incidents and Personal Identifiable Information (PII) incident as well as had our Cyber SOC (Security Operations Center) be more active in logging to ensure clear visibility, faster response, and continuous improvement.

Performance against targets

Material topic	Target or KPI	2023	2024	2025	TREND	Comment
Ethics & Responsible business	Number of confirmed corruption incidents	0	0	0	↑	
	Security incident with customer impact	0	0	0	↑	
	Information security incident with customer impact	0	0	0	↑	
	Information security incident without customer impact	N/A	N/A	17	↑	New measure to better indicate occurrence of information security events
	Number of confirmed Personal Identifiable Information (PII) incident	N/A	N/A	0	↑	

Status towards commitments

Material topic	Target or KPI	TREND	Comment
Social impact from use of data	Zero tolerance for crypto currency activities	↑	No crypto activity in 2025.
Social impact from use of data	Implement a customer risk assessment process by end of 2025	↑	Process in place
Supply chain risks and impacts on environment & human rights	Implement a supplier sustainability program for critical suppliers by end of 2025	↑	Ongoing process with new supplier management tool
Ethics & Responsible business	Zero tolerance for unethical behavior in own operations and value chain	↑	Member of IMM (Institutet Mot Mutor)
Compliance with legislation and standards	Third-party validation of our sustainability data and performance.	↑	No legal violations in 2025. EcoVadis platinum. CDP SME B rating. ISO14001 recertification UN Global Compact report of progress Sustainability report according to GRI standards, subject to limited assurance.
Compliance with legislation and standards	Relevant Business certifications in place	↑	SOC2, ISAE3402 ISO27001, ISO9001, PCI DSS

Responsible business

We do business responsibly

We want to be role models and a sustainable business partner, which includes environmental stewardship, safe and healthy working conditions, and high ethical standards. We comply with the ten principles of the UN Global Compact deriving from the Universal Declaration of Human Rights, the International Labor Organization's declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption. We contribute to and support UN SDGs, and we do business responsibly. This is shared with all new employees in the Staff Handbook and in our Code of Conduct. We aim to conduct due diligence with our business partners, and we apply the precautionary principle meaning that if something we do can cause harm to the public or the environment, the policy or action in question should not be carried out or be done differently. An example of where we have applied this is in the design of our data centers. We have altered the design of cooling to avoid traditional refrigerants. We have also changed fire extinguishing gas for one which does not contain PFAS. Our Code of Conduct, our sustainability policy, our strategy and targets have been approved by our Executive Management team.

Our core values

Our core values guide us to how we act and make decisions every day. They describe what we stand for, how we work, what we can achieve, and how we want to be perceived.

- **Engaged:** We engage ourselves to make the most of every situation and opportunity. With positive energy, we make things happen.
- **Responsible:** By being responsible, we build long-term relationships.
- **Attentive:** We have a keen sense and are receptive to signals that require our action.
- **Innovative:** We are driven to exceed our own and our customers' expectations.

Code of conduct

EcoDataCenter's Code of Conduct clarifies how we should behave in everyday life – as individual employees as well as business partners, employers, and social actors. Our code of conduct applies to all employees, consultants and contractors, board of directors, and other partners, and contains the minimum requirements for us. The code of conduct ensures that our business is ethical and complies with legislation and other rules, ensures financial statements and other types of communications are correct, and it protects the company's assets and immaterial rights. All board members, new employees and contractors sign the Code of Conduct. Everyone is responsible for complying with our code of conduct. The managers are responsible for ensuring that the employees who report directly to them know the information.

Since 2024, we also have a supplier-specific Code of Conduct in place that includes everything mentioned in the company Code of Conduct while placing additional focus on supply chain risks, such as clearly stating our zero-tolerance policies against forced labor, child labor, Conflict Minerals, corruption, etc. The supplier code of conduct is signed by all our suppliers.

Legal compliance

EcoDataCenter is committed to complying with all laws and regulations applicable to our operations. We conduct business only in ways that are consistent with legal requirements, contractual obligations, and our Code of Conduct. We do not engage in activities that cannot be openly endorsed or disclosed, and business decisions are not influenced by personal interests or relationships.

To monitor new and amended legislation, we subscribe to a third-party regulatory monitoring service. Upcoming legal and regulatory changes are reviewed on a semi-annual basis and addressed through management review processes. Compliance with these processes is subject to external audits as part of maintaining our ISO certifications.

During the reporting periods 2022–2025, EcoDataCenter recorded no instances of non-compliance with laws or regulations that resulted in administrative or judicial sanctions or fines.

Sustainability legislation development

Developments in EU sustainability regulation present both risks and opportunities for EcoDataCenter. During 2025, the anticipated application of the Corporate Sustainability Reporting Directive (CSRD) was changed and does not apply to EcoDataCenter at this time.

We nevertheless support increased transparency and aim to enable our stakeholders to meet their regulatory and information needs. While EcoDataCenter does not fall directly under the Sustainable Finance Disclosure Regulation (SFDR), our owners are classified under Article 8, and we therefore continue to report EU Taxonomy eligibility and alignment to them.

EcoDataCenter continues to disclose sustainability information in accordance with the GRI Standards. GRI provides a proportionate, internationally recognized framework that supports transparent reporting aligned with our size, risk profile, and stakeholder expectations. Sustainability data is managed through a dedicated reporting system to support consistency, traceability, and comparability.

In 2025, we reported EU Taxonomy eligibility and alignment to our owners. To increase the share of Taxonomy aligned activities, a third-party certification was conducted by Bureau Veritas during autumn 2024. The certification confirmed conformity with relevant best practices of the JRC Code of Conduct on Data Centre Energy Efficiency, in line with the technical screening criteria of the EU Taxonomy Climate Delegated Act, Section 8.1 Data processing, hosting and related activities, for the EcoDataCenter 1 in Falun.

As part of our commitment, we do not use refrigerants with a Global Warming Potential (GWP) above 675 in buildings commissioned from 2024 onward, and we continuously assess opportunities to replace higher GWP refrigerants in existing facilities with lower GWP alternatives.

Trusting relationships

EcoDataCenter aims to build trusting relationships with customers, suppliers, and contractors, and therefore follow the procurement and sales rules established within the company. We do not engage suppliers or contractors if we are aware that they have disregarded their obligations towards business partners or employees, violated laws, regulations, or agreements, or have unclear ownership structures. We treat our own and our customers' and partners' information with care, and we do not disclose information that we are not allowed to and that can harm us or our partners or give us unfair benefits on the market.

Responsible digitalization for sustainable development

Digitalization, like electricity or roads, is a neutral infrastructure with no inherent moral value. Its impact depends on how we utilize it. At our core, we advocate responsible and sustainable resource management, refraining from supporting industries that harm the environment or society. Instead, we implement sustainable practices across all our operations. Our commitment to offering a sustainable and conscientious solution for businesses seeking data storage and management sets us apart. While we strive to construct our data centers in the most sustainable manner possible, pairing this with meaningful purposes to benefit society is crucial. This is why we actively collaborate with esteemed customers such as DeepL translation services, the University of York, and Green AI, leveraging digitalization for positive societal impact.

Cryptocurrencies

At EcoDataCenter, we are committed to sustainability and ethical business practices. For this reason, we have decided not to engage in any activities related to crypto-currency. Cryptocurrency mining uses a large share of the energy consumed by data centers in the world and has a significant carbon footprint. It also raises ethical concerns about the potential for illegal activities and lack of regulation. We understand that this decision may not align with the views of everyone, but we stand firm in our commitment to sustainability and ethical business practices.

Bribes and anti-corruption

Bribes, hidden commissions, anti-competitive behavior, or any other illegal or unethical advantages are not permitted. EcoDataCenter employees must not participate in any form of cooperation or engage in any actions that could be perceived as anti-competitive, according to our Code of Conduct. EcoDataCenter supports international efforts to combat money laundering and takes its legal obligations seriously. We have been members of Institutet Mot Mutor (IMM) since 2024 to further underline the importance and strengthen the knowledge of all employees in this area. To the best of our knowledge zero incidents of anti corruption, bribery, anti-competitive behaviour or otherwise unethical behavior and their dismissal thereby has occured during the reporting period 2022-2025.

In our enterprise risk process, we have not identified any significant risks of anti-corruption related to our own operations or our value chain activities. However, we acknowledge that this might be an underestimated risk, working with large contracts, construction, and public officials. In our assessment of sustainability-related risks, we have identified the area of anti-corruption as a risk for our company. However, we have not assessed the share of our operations subject to corruption risks.

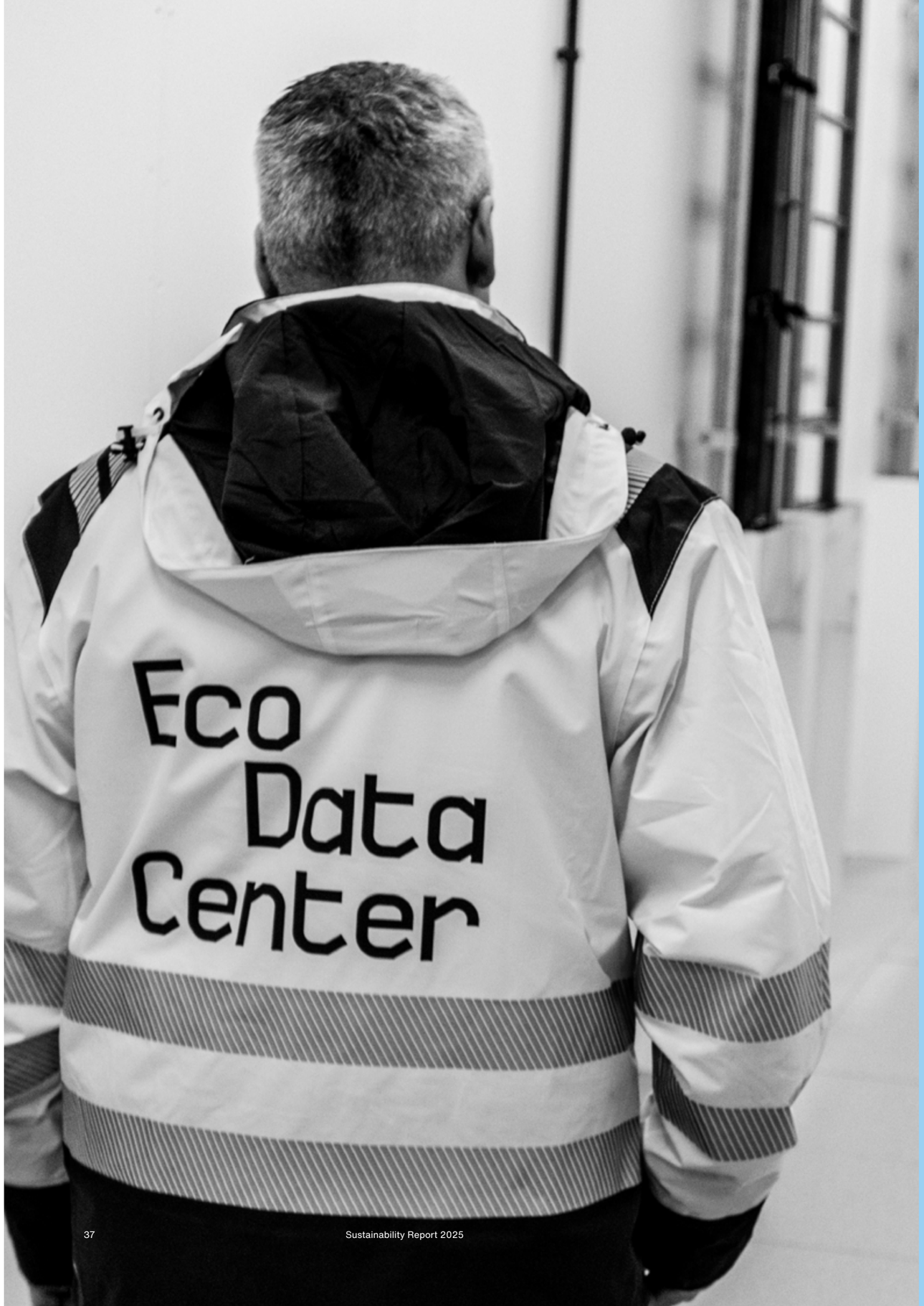
We have identified a need to improve our processes to minimize potential risks. Deploying a program is also a target in our sustainability strategy. We will further identify and assess risks related to this area, and roll out a program containing training and procedures to address risks related to business ethics in the coming years.

Our Code of Conduct regulates anti-corruption and anti-competitive behavior, communicated to our business partners and on our website. All our employees are responsible for complying with our Code of Conduct. All managers are responsible for ensuring that they are known, understood, and complied with by their employees. All new employees and recently assigned contractors read and sign the Code of Conduct. All signed copies of the Code of Conduct are stored in our digital HR system.

Our Code of Conduct describes how to manage conflicts of interest when an individual or the entity they work for is confronted with choosing between the duties and demands of their position and their private interests. We choose to be transparent about how we conduct our business while protecting our business assets and the privacy of individuals.

We do not engage in activities that we cannot openly support or account for, and we do not make business decisions based on personal interests or relationships. Bribes, hidden commissions, or other illegal or unethical favors are not allowed. EcoDataCenter employees shall not engage in any form of collusion or otherwise act in a way that could be perceived as anti-competitive.

The financial audit is performed in accordance with the Swedish Companies Act, the Swedish Annual Accounts Act, International Standards on Auditing (ISA) and accepted auditing norms in Sweden. The management of the Board and the CEO present an audit report at the Annual General Meeting. The auditor also performs a limited review of the voluntary Sustainability report. Internal controls are managed via our management system. The system consists of defined policies, guidance, and routine descriptions, as well as customer agreements, laws and regulations that are followed daily. The management system is certified according to ISO 9001, ISO 14001, and ISO 27001.



Infrastructure investments in local community

Give back to the wider society

At EcoDataCenter, we believe that data centers designed and built the right way will give back to the wider society, the local communities, and be part of a larger ecosystem of infrastructure. We invest a lot to make this happen.

In 2025, nearly 30 MSEK was invested in non-commercial related costs. This year, we have advanced across two major projects:

- We are building a house at EcoDataCenter 1 which can serve as a waste heat reuse facility for connection to district heating system.
- We have continued redirecting of water from a decommissioned reservoir in Falun, alleviating pressure on the utility water system. This will also provide our site with surface water instead of groundwater, which will increase resilience against droughts in the area as well as reduce our dependence on potable water.

Local commitment

All EcoDataCenter sites contribute to the communities where they operate by hiring local employees and working with local contractors. We believe that building a sustainable future starts with investing in our community and supporting local businesses and organizations. That's why we have made a commitment to sourcing locally where possible, we support local businesses, job creation, and regional economic development. In addition, we can reduce transportation-related emissions from construction.

While negative impacts from data centers in operation are limited, the construction of new data center facilities do affect local communities. Potential impacts mainly include land excavation, noise, temporary pollution, and changes to green spaces. We address these impacts through structured planning, early stakeholder dialogue, and compliance with Swedish environmental legislation.

For all new site developments, we engage with municipalities, local stakeholders, and affected communities early in the planning and permitting process. In Falun and Borlänge, we maintain ongoing dialogue with local communities and authorities. Environmental impact assessments and nature conservation inventories are conducted prior to new developments to identify and mitigate potential risks.

Remediation and grievance mechanisms

Sweden is one of the countries in the world with the highest standards in terms of employee rights. Unions are part of our organizations, and collective agreements are made. Employees can seek advice and raise concerns via the unions. Employees can also turn to the unions on legal matters, in case of non-compliance with legislation or other types of issues in the companies. Much of the grievance and remediation mechanisms are also built into the Swedish model and the Swedish workers' legislation. Complaints on any discrimination can be made via the human resources function, the manager, workers' representative, the union, or the Whistleblower function on our external website.

Anyone in Sweden can also raise a complaint to Arbetsmiljöverket, the Swedish Work Environment Authority which can then inspect the complaint. Grievance can be individual, on group level, for a policy or anything violating human rights and inclusion. If a person or a group is deemed discriminated against or harassed, there are investigation and remediation processes according to Swedish law.

Local community engagement and impact assessments (GRI413-1)
All our data centers undergo Environmental Impact Assessments (EIAs) as part of the mandatory Swedish permitting process. An EIA is required to obtain an environmental permit and initiate the establishment of a new data center.

A structured process is applied to engage with local communities during the establishment phase, including dialogue with municipalities and relevant stakeholders to identify and address concerns early.

The EIA assesses impacts such as noise, groundwater, biodiversity, local environment, and cultural values, as well as potential social and economic impacts. Stakeholders are invited to provide input and help determine whether the environmental impact is significant.

Once compliance with legislation is demonstrated, a building permit is granted, including an assessment of environmental impact, health and safety, cultural impact, and how the facility fits into the surrounding landscape. After approval, affected parties have the right to formally appeal the permitting decision within four weeks.

Actual and potential negative impacts on local communities (GRI 413-2)
The primary potential impacts on local communities associated with data center operations relate to emissions to air and noise pollution, both from testing back-up generators. These impacts are regulated through environmental permits, which include specific conditions and limits that must be complied with. The EIAs also include social and economic impacts of establishment.

No significant actual negative impacts on local communities were identified during the reporting period of 2025. Compliance with the set Environmental permit conditions is monitored as part of the annual control program to mitigate potential impacts related to air emissions and noise.

Dialogue with local communities and our neighbors
Neighbors and local communities will typically report any perceived harm to the municipality, but we want to capture their views before that. To keep the people living close to our data centers and construction sites informed, we send information letters to ensure they know of updates and expansion plans.

We also offer study visits to our site for neighbors and other people who are interested. Several study visits were held in 2025, and we regularly present our plans in various local forums to ensure a dialogue with people affected by our operations. Before new establishments take place, we engage early with local communities. Where we are planning to build our next data centers, which currently is in Borlänge we have regular meetings to understand the affected stakeholders as a part of the permitting processes. For all our sites, we have had meetings with the municipality, the electricity provider, NGOs and others.

Supply chain sustainability

Qualification & risks

We follow our supplier qualification process under which the evaluation and selection of our Tier 1 suppliers are controlled and documented. During 2025, we developed our procurement processes, adding a dedicated procurement resource and introduced a more sophisticated supplier management tool. According to our procurement process, new suppliers undergo financial due diligence control, and we ensure that they meet the technical criteria for the service or product they supply. During the contract signature process, our Supplier Code of Conduct is signed by all suppliers.

Critical suppliers are those with high expenditure, single-source suppliers, or suppliers deemed to have a strong impact on quality or on the environment. All critical suppliers undergo further assessment. Besides meeting our financial and technical criteria, they need to have both quality and environmental management systems in place and be certified with ISO 9001 and ISO 14001. For suppliers and contractors, we do not require collective bargaining agreements, but we ask for similar agreements and require them to follow Swedish law whenever working on our sites.

Upstream sustainability challenges

Environmental and social risks in our supply chain are one of our material topics. We deem the environmental and social risks from our Tier 1 suppliers to be limited, but further up the supply chain, there are risks related to the environment and people.

There are several known cases of forced labor, child labor, and environmental negative impacts from the mining industry, and we have limited knowledge about all materials in the components purchased by our direct suppliers for complex products. This is an industry-wide challenge that must be addressed across companies and sector wide common standards.

Improvements in the supply chain during 2025

While 2025 has been crucial year for us to further reduce direct emissions, strengthening the supply chain for selected strategic purchases has been important element to maintain the long-term resilience of the supply chain.

We have paid attention to strengthening supplier management by dedicated resources and tools allocation which improves management of all existing and new suppliers. Along with improvements in supply chain, we have also collected higher share of primary data for our LCAs performed for our latest data center. The data collection improvements drive down the uncertainties associated with environmental impacts.

Supplier-Specific Workforce

EcoDataCenter partners with suppliers, specialist contractors to deliver the construction and fit-out of new data centre capacity. This workforce scales flexibly to match project timelines and milestones, reflecting the dynamic nature of our expansion programme. Suppliers manage their teams directly, bringing the relevant expertise and capacity as each project phase requires. EcoDataCenter maintains oversight through its supplier contracts, progressively improving the impact.

Critical supplier assessment

Type of supplier	Description of supplier and the main risks & impacts	Supplier Activities & partnership	Supplier sustainability commitments	% spend
Construction works Local supplier Risk score: Medium (1,75/3)	Main partner for construction. Biggest risk areas are Health & Safety as well as environmental impact from construction. Purchased goods for our data centers is also included in the expenditures.	▪ Regular dialogues on environmental topics and safety with the contractor. ▪ Reporting sustainability data regularly to us. ▪ A sustainablity maturity assessment was done in 2024 showing overall progress in transparency and goal setting.	▪ Commitment to become climate neutral by 2045. ▪ Long experience of LCAs and sustainable constructions with wood. ▪ Collective bargaining agreement and works closely with trade unions as most companies in Sweden. ▪ Anti-discrimination policy in place. Work to promote equality in the construction sector. Works with local sub-suppliers, and it is largely part of the company's policy. They offer apprenticeships and collaboration with schools.	38%
Equipment in the data center National supplier (global company) Risk score: Medium (1,75/3)	▪ Supplying and installing data center equipment. ▪ Health & Safety Risks from electrical work carried out onsite deemed medium. ▪ Upstream environmental impacts and risks from electronics are deemed medium.	▪ Long-term partnership with the supplier ▪ Ongoing stakeholder dialogues and part of material topics process ▪ Collaboration on development for future data enter solutions.	▪ CDP A, Carbon neutral by 2040. ▪ Net-zero in the value chain by 2050 (SBTi 1,5 degree). Highest ranked on sustainability rankings year on year. More on Schneider's sustainability performance here	12%
Piping Local supplier (international sub-supplier) Risk score: Low-Medium (1,5/3)	▪ This supplier is a contractor for piping. The supplier has limited social impacts and risks associated with the work carried out at our sites. ▪ For the environmental assessment, we have had a dialogue with the subsupplier, meaning the supplier of the pipes (OSTP) where the main environmental impact is from the stainless steel.	▪ A self-assessment by the sub-supplier showed strong sustainability performance. ▪ Supplier EPDs from the sub-supplier for the products shows the emissions from their products are significantly lower than market average according to their data.	Sub-supplier: Climate neutral by 2025 Uses recycled content, 100% recyclable products ISO14001, 45001, 9001	8%
Electrical installations National supplier (swedish company) Risk score: Low-Medium (1,5/3)	▪ This company is doing the majority of all electrical work. ▪ Health & Safety risks are deemed high, working with electrical installations to a large extent and in high pace.	▪ Contractor dialogues on a daily basis on safety. ▪ Reporting health & safety regularly to us.	Climate neutral in the value chain by 2045.	7%

Type of supplier	Description of supplier and the main risks & impacts	Supplier Activities & partnership	Supplier sustainability commitments	% spend
Power utility Local supplier Risk score: Low (1,25/3)	We are purchasing renewable electricity from the company. They are also recycling our waste and supplying water. Low social risks, environmental impact of hydropower deemed medium.	▪ Company is publicly owned, which means it is strictly controlled by laws and regulations. ▪ Regular dialogues and reports of environmental data.	▪ Strictly controlled operations in Sweden. ▪ Has a goal to be 100% Fossilfree by 2025 in its energy and heating operations ▪ improving waste and resource management, strengthening community resilience, and supporting circular and climate-smart solutions - all grounded in local service and infrastructure	6%
Waste handling Risk score : Low (1.25/3)	Waste handling inherently carries risks across environmental harm, human health & safety, regulatory compliance, and financial exposure. Effective mitigation is ensured through reviews on systems, governance fraemworks.	▪ The engagement was corresponding to the deconstruction work of a brown field assets. ▪ The engagement is expected to be limited to specific workpackages.	▪ The group has committed to emissions reduction targets aligned with a 1.5 °C pathway. EcoVadis platinum rating ISO 9001.14001.45001 certifications	4%
Backup power generators National supplier (global company) Risk score: Low-Medium (1,5/3)	The supplier sells backup generators to us.	Self-assessment done by sub-supplier supplying backup generators have LCAs in palce and ensuring HVO can be used in their generators.	ISO 14001 and ISO 9001 certified.	3%
Fire equipment National supplier Risk score: Low (1,25/3)	▪ The company installs fire equipment. ▪ Social risks relates to operating on a construction site, mainly working on heights. Environmental impact is deemed low because of the scope of work.	Close collaboration on construction site.	ISO 14001 and ISO 9001 certified.	2%
Supplier of power and energy Local supplier Risk score: Low (1.25/3)	▪ We are purchasing renewable electricity from the company. ▪ Low social risks, environmental impact of hydropower deemed medium.	▪ Company is publicly owned, which means it is strictly controlled by laws and regulations. ▪ Regular dialogues and reports of environmental data	Participants in Klimatneutrala Borlänge 2030. ISO 14001, 9001	1%
Share of total 2025 spend				**81 %**

Supplier risk assessment

All key suppliers are subject to a structured sustainability risk screening. Suppliers are assessed based on:

- Environmental risks (direct and value chain impacts)
- Social risks (health & safety, labor practices, human rights)
- Governance and compliance risks
- Geographic and sector-specific exposure

Each supplier is assigned a risk score (Low, Medium, or High) based on sector characteristics, country risk, and the nature of the supplied goods or services. Construction works and technical equipment suppliers typically carry medium inherent risk due to complex supply chains and material intensity, while local utility and waste management partners generally present lower risk due to strong Swedish regulatory oversight.

Mitigation measures, follow-up and continuous improvement
EcoDataCenter manages supplier-related risks through structured dialogue, clear contractual requirements, and ongoing performance monitoring. We maintain regular sustainability and safety follow-ups with key suppliers, review certifications and climate commitments, and require compliance with applicable legislation.

Particular focus is placed on health and safety in construction activities, environmental due diligence for high-impact materials, and evaluation of suppliers' environmental management systems and certifications.

Although most key suppliers are assessed as low to medium risk, we recognize the inherent risks linked to construction and infrastructure development. We therefore continuously strengthen our supplier evaluation processes and integrate sustainability considerations into procurement decisions to ensure responsible growth and positive local impact.

Local supplier commitments

Local commitment and responsible supplier management
At EcoDataCenter, we believe that long-term sustainability starts locally. Our data centers are not isolated assets – they are part of the communities and infrastructure ecosystems in which they operate. We therefore prioritize local engagement, local sourcing, and structured supplier governance as integral parts of our sustainability strategy.

Commitment to local sourcing
We aim to work with local and national suppliers wherever possible. During construction and operations, a significant share of our procurement spend is directed toward Swedish suppliers, particularly in Falun and Borlänge. This approach:

- Reduces transportation distances and associated emissions
- Strengthens local value chains and job creation
- Builds long-term competence in sustainable data center construction and operations
- Contributes to regional resilience and economic development

We collaborate closely with key local partners in construction, electrical installations, energy supply, piping, waste management, and fire protection. Through regular dialogue and structured follow-ups, we ensure alignment on environmental performance, occupational health and safety, and ethical business conduct. →→

→→ Beyond procurement, we actively contribute to local infrastructure and community development through energy partnerships, grid strengthening initiatives, circular resource solutions (e.g., waste heat recovery), and engagement with educational institutions and local associations.

Critical concerns and whistleblowing

In the event of a violation or suspicion of a violation of the Code of Conduct or other types of unethical behavior, a report should be made. Critical concerns should be reported immediately to the highest governance body, the board.

The management team is directly involved in handling complaints of any type of critical concern. These can be done via the manager, workers' representatives, the union, the Whistleblower process, or the Swedish Work Environment Authority. Thereafter, concerns deemed critical are swiftly communicated to the highest governance body, the board.

During 2025 we had no critical concerns reported. In the event of a violation or suspicion of a violation of the Code of Conduct or other types of unethical behavior, a report should be made. Critical concerns should be reported immediately to the highest governance body, the board.

In 2022, we implemented a whistleblower procedure. The whistleblower procedure is limited to serious misconduct and irregularities and not for reporting minor offenses between individuals or general dissatisfaction and complaints. The whistleblower channel functions as an alternative avenue for reporting, distinct from the standard reporting channels. Individuals can report via our external website, where a dedicated link is provided. There is a third-party person in the whistleblower function to ensure independence. Employees have the option to remain completely anonymous when whistleblowing. Since we implemented the procedure, in 2022, we have not had any cases of whistleblowing.

Stakeholder engagement

We interact with several stakeholders on many levels of the organization for different reasons. Engaging with stakeholders means that we can work proactively and identify risks and opportunities earlier in the process. The key stakeholders we engage with are those directly affected by our operations, and those that directly affect us. Some of them, if not already mentioned in previous sections of this report, are mentioned below. Lessons from these engagements drive our actions and strategies.

Stakeholder	Type, frequency, and level
Local authorities	We are in close dialogue with local authorities to ensure social acceptance and that we can collaborate on various topics such as education or our operations. When we have new projects, we keep an even closer dialogue to reduce the risk of misunderstandings.
Customers	We have several ways of following up with our customers to hear their views. New customers' requirements are collected during the sales process and then implemented into operations. For existing customers, we capture customers' views in operations meetings monthly. We also follow up on how they perceive us through a customer satisfaction survey. Requirements for existing customers are also implemented through change requests.
Employees	We do employee satisfaction surveys quarterly and annual personal development assessments. In addition, managers meet employees one-on-one on a regular basis so managers can understand if there are any health and safety-related issues and ensure that the employees develop. We have a working environment committee and a workers' representative.
Unions	According to Swedish labor law, we meet with union representatives in formal negotiations (MBL) but also in informal meetings, such as the union Unionen doing study visit at the sites.
Suppliers	We have a close collaboration with our suppliers, especially our contractors building our data centers to discuss various sustainability topics such as environmental topics, construction materials, health and safety or reporting. We have regular meetings with the contractors and with our critical suppliers. We have also piloted our supplier sustainability program which will help us understand where our suppliers are and how we can collaborate to reduce negative impact on nature and ensure good social conditions in the supply chain.
Local community	It is important to us that we feel valued in the local communities where we operate. We send out information letters to the local community in Falun and Borlänge, the neighbors, to our site. We also have an ongoing dialogue with the municipality, and we invite the local community for study visits at our site. Where we plan to build new data centers, dialogues and forums where local people can vent their concerns and we can get valuable input, which are even more important. The right to appeal decisions is granted according to Swedish legislation.
Owners	We have regular meetings with our owners on various levels of the organization to ensure we have mutual understanding and collaboration.
Partners	We have several partners who we collaborate and keep a dialogue with, such as utility and energy companies. We have regular dialogues about power and other utilities to ensure we can get the capacity needed for future establishments and in supporting the grid. We have partnerships with the local energy companies Falu Energi och Vatten, which uses our waste heat in Falun, and Borlänge energi who we are looking into ways of further increasing our waste heta reusage.

Security and information security

Our location in Falun provides world-class security. It is a site with very low natural disaster risks (flooding, landslides, earthquakes, volcanoes, tornados, or other extreme events). In addition, there are extremely small risks for man-made disasters, such as aircraft, truck, or railway accidents.

The fact that EcoDataCenter handles sensitive information for our customers places high demands on our staff. Therefore, background checks are carried out on all staff and long-term contractors working on the site. For some roles, the background checks are more rigorous. Furthermore, drug and alcohol tests can be carried out. Employees and contractors working at our construction sites need to undertake EcoDataCenter specific training where security is part of the content. The training is carried out via a web portal (SSG) and is registered. After the training, the participants need to pass an exam. This training needs to be renewed on an annual basis. It is mandatory to use an electronic personnel ledger on our construction sites. In addition to this, employees perform cybersecurity training continuously throughout the year.

EcoDataCenter's basic approach to site security design is the concept of layers of defense. This means that multiple consecutive layers of protective measures are deployed in concentric circles around our buildings, and within the data center building itself around each data room. The circles start from the outer perimeter with a unique natural rock wall and move inward to the area of the building or room with the greatest need for protection. We have cameras all over our sites, several fences, vehicle control, electronic access control, and secure doors throughout our buildings.

Information security

We are certified according to ISO 27001 and SOC 2, a standard for information security and a security report, respectively. The third-party validations require us to have an information security management system that meets the requirements of the standard, such as a system for detecting, reporting, and addressing information security weaknesses and incidents and handling sensitive data. Working with information security is a central part of the company. Guidelines, policies, informational texts, and visualization are implemented to ensure a formal reporting structure with support systems. Management Reviews are carried out throughout the year where participants from the executive management team together assess the effectiveness of the information security management system in relation to business objectives and goal achievement.

Assigned employees are trained in how to act if an incident occurs, and awareness training is carried out on a quarterly basis. Incident reporting is formalized in incident classification, and highest levels of incident are reported to the management team. Information security includes, for example:

- Proper handling of information.
- Secure management of IT resources and third parties.
- General safety awareness/behavior.
- Compliance with internal rules and external laws and requirements materials A security incident management process is defined, covering the following activities:
- Security incidents (physical & logical) are detected via monitoring systems or reported by personnel.
- If an incident occurs, the guideline for Incident Management and Procedure for information security incidents is executed and the incident is evaluated.
- Depending on type of incident and severity, information is communicated to stakeholders, such as: EcoDC Executive management team, EcoDC Board of Directors, Customers, Authorities. Every year, the incident management guidelines are revised and reviewed to ensure that incidents are handled in a structured manner, in the management review.

Customer privacy

Data can be very sensitive, and many of our customers do not want anyone to know where their servers and data are located. We have no access to our customers' data that is hosted on the servers in our data centers, even if they are stored with us. We keep information about our customers confidentially unless we agree to share customer stories. If information about our customers leaks, we have an incident management process for how to manage the situation. No instances of customer privacy complaints and losses of customer data were identified in 2022-2025.

Certifications and standards

EcoDataCenter and all the sites are certified for quality management according to ISO 9001, environmental management according to ISO 14001, ISO/IEC 27001. We are also certified according to SOC2, ISAE3402 and PCI DSS. We have used the EN50600 standards as base requirements for the design of our data centers in Falun to minimum availability class 3.

Memberships and commitments

We seek to support and be members of networks and associations that help us develop and influence others. We are currently members of the following sustainability-related associations:

- UN Global Compact
- Carbon Neutral Data Center Pact signatory.
- The Swedish Anti-Corruption Institute (Sw: Institutet Mot Mutor “IMM”)
- Klimatneutrala Borlänge 2030 (local cross-sector initiative in Borlänge, Sweden)
- Nätverket Hållbart Näringsliv (cross-industry Sustianability network in Sweden)

Sustainability acknowledgments

During 2025 we received the following acknowledgments of our sustainability performance:

We received an EcoVadis Platinum medal in 2025

Our Recognition Page

CDP SME Climate Score B
The highest SME score available in 2025

CDP (Carbon Disclosure Project) is a global disclosure system for companies, capital markets, cities, states and regions to manage their environmental impacts. In 2025, we disclosed to CDP under the newly established CDP SME Questionnaire.

Environment
Reduce pressure on nature

Our ambition is to reduce the environmental impact of our operations by cutting our carbon footprint across the value chain. We use only renewable electricity and continue phasing out fossil fuels and emissions from cooling systems. As data centers consume significant electricity and water, we are committed to using these shared resources responsibly.

Our facilities are built for future needs, with liquid cooling systems and resilience to rising temperatures and extreme weather. We strive to optimize energy, water, and materials in design, procurement, operations, and by actively seeking ways of sharing excess heat.

Performance against targets
Below are the targets, metrics, and controls that we use to track our performance. Various stakeholders have been involved in shaping the strategy and related targets, such as our owners, municipalities, employees, and banks.

Communication of performance against targets
As part of our management system, we conduct an annual management review of our performance against targets. We also set new targets and analyze how to improve. We share our sustainability performance with all our employees through our sustainability report, on the dashboard in our reporting system, on our intranet, and on our external website. We also share emissions information with our customers in a monthly GHG emissions report, and we communicate our emissions in an open report on our website.

Performance against targets

Material topic	Target or KPI	2023	2024	2025	TREND	Comment
Energy use	**PUE** Power Usage Effectiveness	1,38	1,35	1,22	↑	
GHG Emissions	**REF** Renewable Energy Factor (>99% fossil-free operations by 2028 excl. blackouts)	98,2%	99,3%	99,7%	↑	
	CUE Carbon Usage Effectiveness, (-70% carbon intensity CUE, excl. blackouts)	6,2	2,6 gCO2e/kWh IT Load	1,17 gCO2e/kWh IT Load	↑	
	ERF Energy Reuse Factor (Share of reused energy)	10%	6%	1%	↓	Decline in total energy volumes delivered due to divestment of Sthlm site. Historical calculation error diminishes value of comparison vs previous years.
	Emissions related to heat reuse Help partners avoid ≥200 tCO_2e/yr via waste heat reuse by 2028	165 tons CO_2e avoided	118 tons CO_2e avoided	46 tons CO_2e avoided	↓	Decline in total energy volumes delivered due to divestment of Sthlm site. Historical calculation error diminishes value of comparison vs previous years.
Water use	**WUE** Water usage effectiveness (Liters of cooling water withdrawal/kWh IT load)	0,91	0,70	0,42	↑	Water is coming from non-potable water sources as of 2025, and EcoDC operates only in low water stress areas.
Waste	**Waste diversion** ≥90% of waste diverted from disposal (construction waste and operational waste)	89%	93,9%	40%	↓	A large share of total construction waste in 2025 was related to an environmental incident in Borlänge leading to removal of large quantities contaminated water.

Status towards commitments

Material topic	Target or KPI	TREND	Comment
GHG Emissions	Define Scope 3 emissions targets	→	Part of updated ESG Strategy launching Q2 2026
	Implement low-impact refrigerants below GWP 675 in all new data centers by end of 2028	↑	No installation of refrigerants with GWP>675 during 2025.
Water use	No permanent use of ground water for cooling by the end of 2028	↑	
Biodiversity	Map, reduce, and compensate negative biodiversity impacts for all sites	↑	Climb assessment done for the Falun site, in progress for Borlänge. NO significant impact on biodiversity from site establishment.

Our energy use (GRI103)

Management of material topic

We manage energy strategically to reduce environmental impact and costs. By using renewable electricity, improving efficiency, and monitoring performance, we aim to lower our overall consumption and carbon footprint. Energy considerations are integrated into investment decisions, operations, and continuous improvement initiatives to ensure long-term resilience and sustainability.

Energy Consumption (GRI103-2)

Data centers require significant energy to run and cool our customers' servers. As we grow, our energy use increases accordingly to ensure safe and reliable operations. All energy that is consumed at the data center campus is consumed and invoiced to EcoDataCenter and not to specific customers. Our priority is to enable energy-efficient performance, using a 100% renewable electricity mix. Table 2.1 below shows the overall energy usage for 2025, indicating consumption vs generation and renewable vs non-renewable sources. From energy contracting perspective electricity consumption for customer operation is billed to EcoDC.

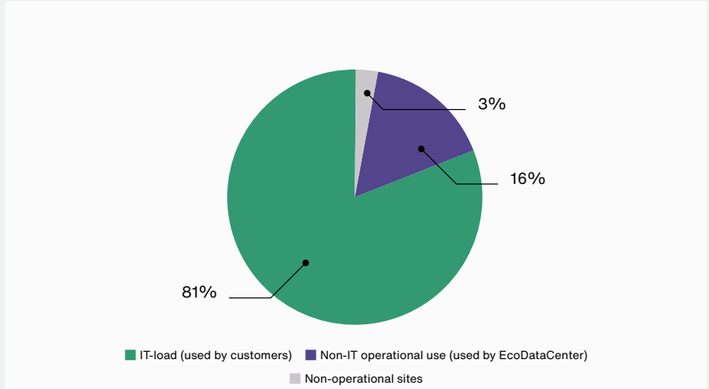
Table 2.1 Energy consumption and self-generation within the organization (GRI103-2)

Energy Type	Source	UoM	2024	2025	Comment
Energy consumed by the organisation					
Non-renewable fuel consumption	Diesel	kWh	197 463	172 056	Decreased usage thanks to divestment of 2 sites
	EcoPar	kWh	200 966	109 967	
Renewable fuel consumption	HVO100	kWh	682 126	1 167 258	
Purchased electricity (renewable)	Grid electricity (renewable)	kWh	51 719 100	118 781 856	75% Hydropower 25% Wind
Purchased heating and cooling	District heating to heat office buildings	kWh	67 214	289 158	District heating used non-operational buildings in Borlänge and Stockholm
	District cooling	kWh	0	4 754	Office in Stockholm
Subtotal – Energy Consumed		**kWh**	**52 866 869**	**120 525 049**	
Energy produced by the organisation					
Produced electricity (renewable)	Solar PV	kWh	247 771	170 903	Self-use
Subtotal – Energy Produced		**kWh**	**247 771**	**170 903**	
Net Energy Consumed & Produced		**kWh**	**53 114 640**	**120 695 952**	

Management of material topic

The total energy usage in 2025 vs previous years increased thanks to deployment of additional data center capacity at EcoDataCenter 1, driving increased electricity consumption. The electricity used by customers has increased both in absolute terms as well as in relative share of overall electricity usage and made 81% of total electricity use in 2025, see figure 2.1. Electricity, steam and cooling sold is 0 kWh for the year 2025. During 2025 we have had no energy consumption outside the organization.

Figure 2.1 Distribution of electricity usage



Fuel usage

Reliable data center availability is central to our customer commitment. We ensure this through redundancy, maintenance, and two independent grid feeds supported by UPS battery backup, and onsite generators in case of a blackout. These systems are rarely used due to Sweden's reliable power grid, but we regularly must test our fuel-powered onsite generators to ensure readiness, which requires fuel. During 2025, we increased our share of renewable HVO100 fuel usage in line with the expansion of EcoDataCenter 1, and we divested the sites in Piteå and Stockholm which operated back-up generators on non-renewable fuel, which lowered the amount of non-renewable fuel consumption. In 2025, HVO100 fuel usage represented 81% of the total fuel consumption, see table 2.1.

Share of renewable energy

In 2025, 99.5% of total energy used in 2025 came from renewable sources, and the target is to be at a minimum of 99%. The combination of purchasing renewable electricity and ensuring usage of HVO100 as backup fuel are the main elements of meeting this target.

Table 2.3 - Share of renewable energy

Renewable energy (in kWh)	**2024**	**2025**
Purchased Electricity	51 719 100	118 781 856
Renewable fuel consumed	682 126	1 167 258
District heating from renewable sources	66 542	117 758
District cooling from renewable sources	0	4 754
PV generated	247 771	170 903
Renewable	**52 715 539**	**120 242 529**
Total energy consumed (kWh)	**53 114 640**	**120 695 952**
Renewable energy share (%)	**99,2%**	**99,6%**

Includes all energy consumed by the organisation. In the calculation of the renewable energy share, only energy from renewable sources as defined by applicable standards is included. Recovered energy such as industrial excess heat and waste incineration is excluded, except for the biogenic fraction of waste.

Energy intensity for data center operators (GRI103-5)

We report energy intensity using metrics from the EN 50600-4 series

As a data center operator, our energy use is continuous and infrastructure driven. To more accurately reflect performance, we report energy intensity using metrics from the EN 50600-4 series, which are widely recognized in our sector:

- **Power Usage Effectiveness (PUE):** Total data center facility energy divided by IT equipment energy, indicating overall efficiency.
- **Renewable Energy Factor (REF):** The share of total energy in the data center sourced from renewables.
- **Energy Reuse Factor (ERF):** The portion of energy reused beyond the data center.

These indicators provide a more relevant view of energy intensity than general economic ratios. They support comparability within the industry and reflect our efforts to improve operational efficiency, in line with GRI's intent to report material and decision-useful information.

Energy intensity Power usage effectiveness (PUE)

Power usage effectiveness (PUE, ISO/EN 50600-4-2) is a baseline metric for assessing data center energy efficiency. It is calculated as the ratio of total data center energy use including IT and cooling divided by the energy used by IT equipment (IT load), indicating how efficient energy is used. While PUE is typically reported per data center, we also present a company-wide PUE for our operations. PUE reflects energy efficiency only and does not capture other relevant impacts such as water use or total emissions. All energy consumption for PUE calculation refers to energy consumption corresponding to the organization

A PUE value of 1,0 represents perfect energy efficiency, indicating that all energy consumed is used to power the IT equipment without waste. In other words, a lower PUE value means higher energy efficiency – which translates into reduced energy costs and a smaller carbon footprint.

The PUE is steadily decreasing as IT load increases in relation to overall energy use, driven by the expansion and ramp-up of EcoDataCenter 1 in Falun. The IT load increase in 2025 compared to 2024 was 157%, while the increase in overall energy usage was 133%. This is the main reason for higher energy efficiency, driven by increased customer activity at EcoDataCenter 1, visualized in figure 2.2.

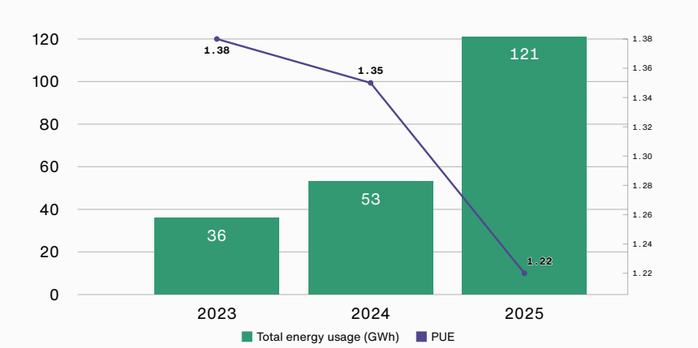
$$\mathrm{PUE} = \frac{\mathrm{E_{DC}}}{\mathrm{E_{IT}}}$$

E_{DC} = Total data center energy consumption, excluding electricity from construction and non-operating sites, in kWh.

E_{IT} = IT load or IT equipment energy consumption, in kWh.

Table 2.4 - Power usage effectiveness	2024	2025	Comment
PUE_2 All sites			
E_{DC}	50 380 934	117 121 530	Includes all energy used for buildings F2, F3 in Piteå, 1A, B, C, D in Falun, Atlas, Tellus in Stockholm and Office). Not site works and non-operational sites.
E_{IT}	37 343 464	95 969 279	Includes IT load, energy consumed by customer's hardware
PUE_2 All sites, 2025	1 , 35	1 , 22	PUE_2
PUE_2 EcoDataCenter1 Falun			
E_{DC}	41 980 918	112 544 997	
E_{IT}	32 726 642	93 807 926	Includes IT load, energy consumed by customer's hardware
EcoDataCenter 1, PUE_2, 2025	1 , 28	1 , 20	PUE_2

Fig 2.2 PUE in relation to overall Energy usage



The PUE metric should not be used as an isolated KPI to compare different data centers with each other. A better overview is provided by combining metrics to the complete set of resource usage, also considering source of energy and water, such as the combination of PUE, REF, CUE and WUE. A very low PUE can quite easily be achieved by removing all the redundancies in electrical and mechanical systems in a data center, resulting in a substantial loss of expected availability. Theoretically, outdoor air could be led directly into a data center to save energy. But, with that, contamination will be brought in which risks damaging the equipment and in addition, the possibility of capturing excess heat is lost. The physical security of such a solution also means the data center will be substantially impaired.

Renewable Energy Factor (REF)

The Renewable Energy Factor (REF) metric (EN 50600-4-3) describes the percentage of renewable energy (RE) over total data center energy. REF provides an assessment of the mitigation of CO2 emissions originated from energy consumption in a data center. Like PUE, the metric excludes energy consumption from non-operational sites.

REF EcoDataCenter 1	**2024**	**2025**
E_{DC} EcoDataCenter 1, Falun	41 980 918	112 544 997
E_{Ren}	41 590 443	112 213 778
REF EcoDataCenter1	**99,1%**	**99,7%**

$$\mathrm{REF} = \frac{\mathrm{E_{Ren}}}{\mathrm{E_{DC}}}$$

E_{DC} = Total data center energy consumption, excluding electricity from construction and non-operating sites, in kWh.

E_{Ren} = Renewable energy in kWh owned and controlled by a data center.

Energy Reuse Factor (ERF)

The ERF metric (EN 50600-4-6) defines Energy reuse factor as the energy taken by a third party in relation to overall energy usage of the data center.

$$\mathrm{ERF} = \frac{\mathrm{E_{Reuse}}}{\mathrm{E_{DC}}}$$

E_{Reuse} = energy from the data center (annual) that is used outside of the data center, and which substitutes partly or totally energy needed outside the data center boundary (annual).

E_{DC} = total data centre energy consumption (annual).

Table 2.5 - Energy reuse factor	**2024***	**2025**	**Comment**
ERF All sites			
E_{Reuse} (kWh)	2 979 454	1 229 309	Stockholm provided waste heat for the entire 2024 but only during 6 months 2025 due to divestment.
E_{DC} (kWh)	50 380 934	117 121 530	
ERF All sites, 2025	6%	1%	
ERF EcoDataCenter1 Falun			
E_{Reuse} (kWh)	483 674	530 979	Slight increase in actual off-take 2025 vs 2024.
E_{DC} (kWh)	41 980 918	112 544 997	
EcoDataCenter 1, ERF, 2025	1%	0,5%	The low number is largely connected to the increase in installed capacity with no potential for scaling existing heat reuse solutions.

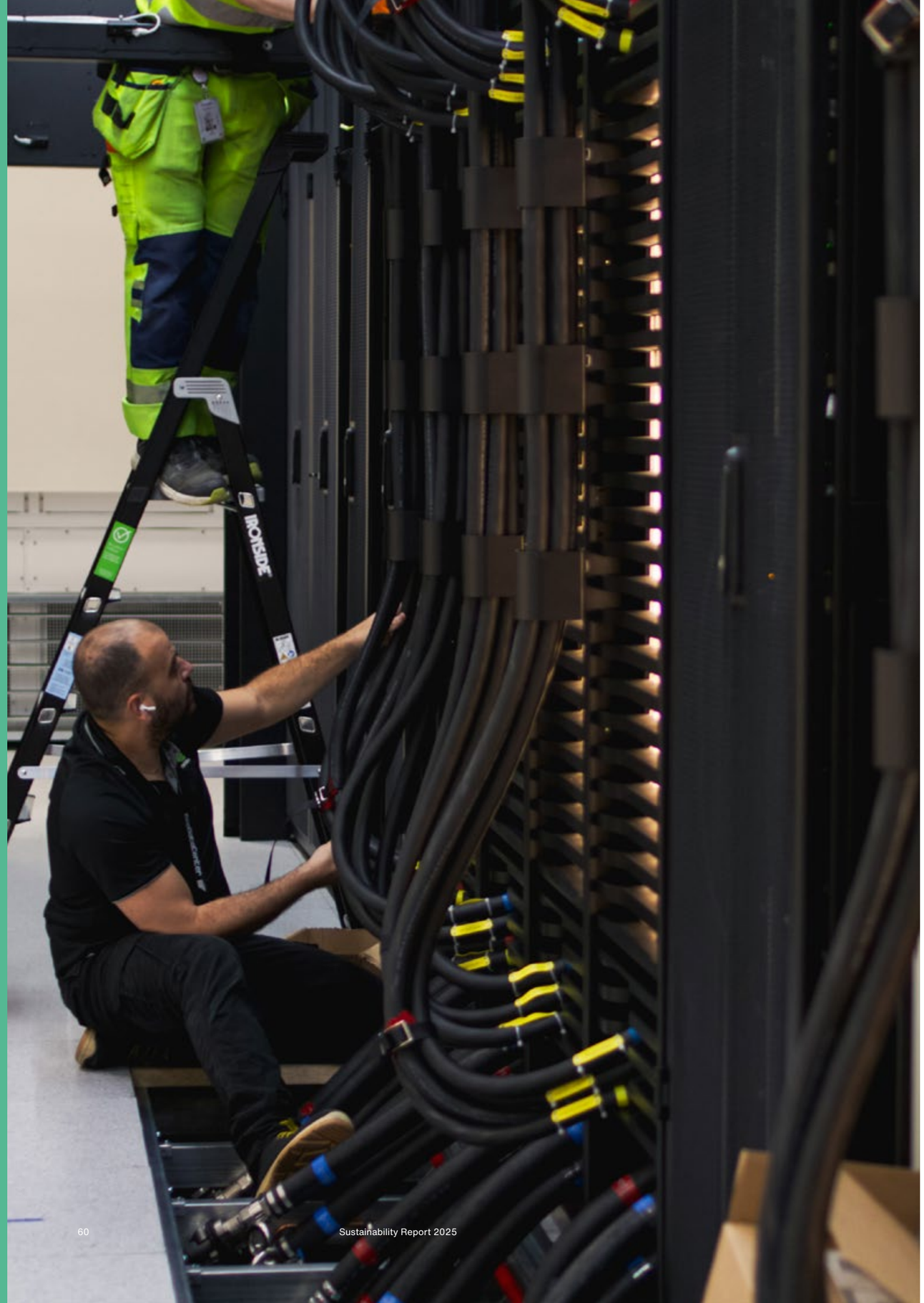
* Calculation methodology of ERF has been changed from 2024 to 2025 reporting. This makes the value incomparable to previous reporting years. Key difference is how EReuse is calculated. Previously it was calculated on the basis of energy sent for reuse, now adjusted to actual energy reused by the third party actors.

Methodology for energy data collection and calculation

Two of our four sites reported energy data for 2025 in the sustainability reporting platform. The divested sites Stockholm and Piteå reported data for the first half of 2025 prior to divestment. Energy data is collected from site monitoring systems, supplier documentation, and operational records.

Calculations follow the Greenhouse Gas Protocol and use emission factors relevant to the energy source, geography, and reporting period. For 2025, factors were sourced from fuel and electricity suppliers and public datasets including Energiföretagen, Electricity Maps, and DEFRA.

Backup generator fuel consumption is allocated between HVO and diesel based on their proportional share in the tank, recalculated when additional HVO is added.



Energy and cooling efficiency in our data center design

The most sustainable energy is the energy not consumed. We take a holistic approach to energy and cooling efficiency to reduce emissions across the full life cycle of our data centers. Key measures include:

1	Locating our sites in Sweden's naturally cool climate, enabling free cooling and increased opportunities for heat reuse.
2	Operating in regions with abundant renewable electricity, minimizing the climate impact of the energy we do use.
3	Designing chill water-based cooling systems across our data centers, which means they can directly connect liquid-cooled customer loads. Chill water-based cooling systems also enable the reuse of excess heat
4	Using adiabatic cooling where suitable, such as in Falun, to reduce electricity demand for mechanical cooling.
5	Encouraging customers to choose hardware that can operate at higher temperatures, reducing cooling needs and improving system efficiency.
6	We encourage customers to adopt new technology such as liquid server cooling. Liquid transfers heat more effectively and improve overall energy efficiency. It also enables CPU and GPU hardware to run at 100% or more utilization by removing heat faster than air cooling. This allows fewer servers to deliver the same computing capacity, increasing capacity per data center while reducing material use and the energy needed to produce those materials.
7	Applying distributed redundancy in electrical and mechanical design, increasing utilization rates and reducing the need for materials, equipment, and building footprint.
8	All equipment in our data centers is selected based on life cycle cost. This may require higher upfront investment but results in lower energy use and costs over time. Examples from Falun include high-efficiency UPS systems, properly sized pipes to reduce pressure drop and pumping power, VFD-controlled pumps and fans, LED lighting, occupancy-controlled HVAC, and motion-controlled lighting.
9	We use large thermal buffers storing over 1,000 cubic meters of chilled water. The water is cooled at night or when renewable electricity is abundant and used during the warmest hours to reduce reliance on mechanical chillers and save energy. Like a BESS for electricity, these tanks store thermal energy and provide onsite backup water for adiabatic cooling if utility water is unavailable.

Europe's first liquid-cooled blackwell cluster:

Scaling efficient AI and enabling increased heat reuse

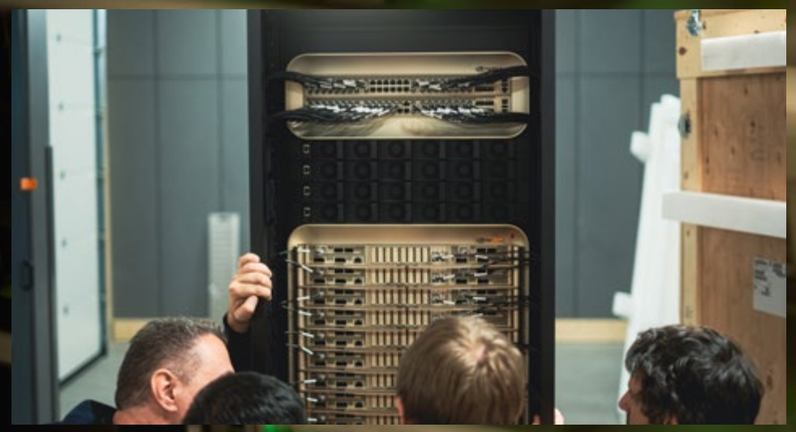
→→ During 2025, EcoDataCenter led Europe's first deployment of a liquid-cooled Nvidia Blackwell cluster. In collaboration with DeepL, Nvidia, Schneider Electric, and trusted local partners, we successfully brought the DGX GB200 platform into operation within a short timeframe. This marked a significant milestone for both our company and the European AI ecosystem, demonstrating our capability to deliver next-generation infrastructure at scale.

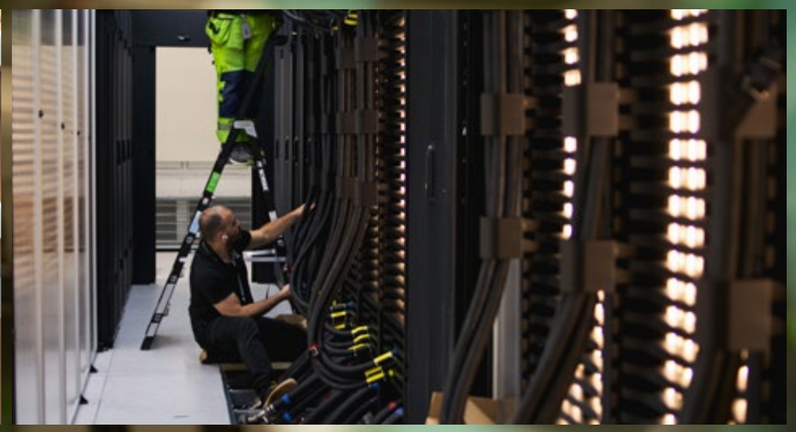
Liquid cooling has been an integrated part of EcoDataCenter's design philosophy from the beginning. We consider it a key technology to enable more efficient and resource-optimized data center operations. Compared to traditional air-based cooling, liquid cooling improves cooling efficiency thanks to the higher thermal capacity of water compared to air. This enables higher rack densities and increased compute output per square meter, reducing the need to expand building footprint to meet rising demand.

Overall, liquid cooling contributes to lower energy consumption per compute and more efficient use of space, supporting a more flexible and scalable data center design.

In addition, higher compute density also results in increased heat output, which strengthens the potential for waste heat recovery. At the end of 2025, we successfully connected the GB200 cluster to our existing heat recovery solution in Falun. This is expected to increase operational hours of the system during 2026, further enhancing our ability to contribute to local energy systems through heat reuse.

The increased use of liquid cooling significantly enhances opportunities for large-scale heat reuse, since higher waste heat temperatures enable more impactful applications, such as district heating. During 2025, we worked closely with local energy companies in Falun and Borlänge to assess how excess heat could contribute to the local district heating systems. While the initial analysis of the potential is promising, it is critical to us that any solution delivers a genuine positive impact at system level and benefit the local community, both economically and environmentally. We are committed to designing and investing in our sites to enable active heat reuse and will continue advancing projects that create tangible benefits for the local community. ←←





"Not all data centers can handle these systems" - Jensen Huang

In his 2025 Paris GTC keynote, the Nvidia CEO highlighted EcoDataCenter's unique position to operate the next generations of AI clusters, naming us the "first fully integrated AI factory".

GHG Emissions (GRI305)

Management of material topic

We manage our greenhouse gas emissions to reduce climate impact across our value chain. By prioritizing renewable energy, improving energy efficiency, and phasing out fossil fuels, we aim to lower both direct and indirect emissions. Emissions management is integrated into our strategy, investments, and operations, with continuous monitoring to drive improvement and support long-term climate goals.

Lessons learned are incorporated into EcoDC's operational policies and procedures through our established management systems, including ISO 14001. Findings from management system reviews and internal/external audits are assessed, documented, and translated into corrective actions, process improvements, and updates to relevant operational procedures where applicable

Emissions outside of scopes:
Biogenic emissions

The use of HVO100 in our backup generators eliminates fossil-based CO_2 emissions during combustion. However, the combustion of HVO100 results in biogenic CO_2 emissions, which are disclosed outside our scope-based emissions accounting. For 2025, these biogenic emissions amount to 279 tons CO_2e, calculated using the assumption that the combustion emissions of renewable biogenic fuel are equivalent to those of conventional diesel during the combustion phase.

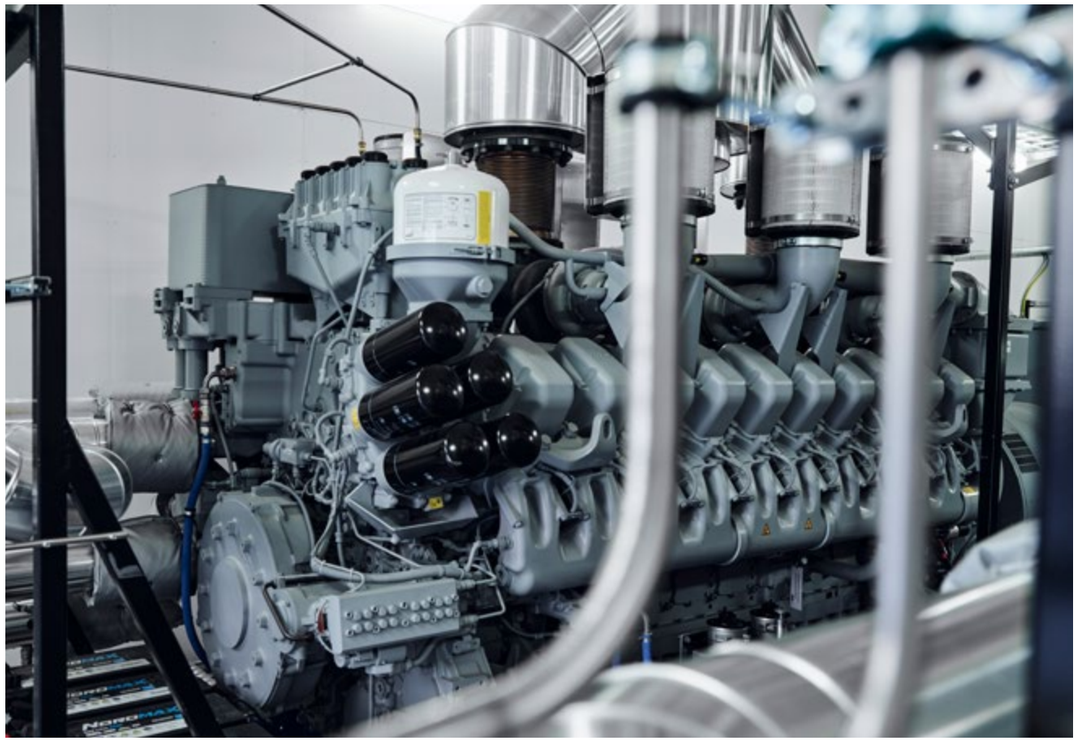


Table 2.6 - Scope 1-3 emissions (GRI305-1-3)

Scope (GHG emissions, tCO2e)	2023	2024	2025	Rep. period	Comment
Scope 1	160	96	94	2025	Includes direct emissions from fuels.
Scope 2 Location based	936	1 037	2 270	2025	Location based emission factors based on electricity maps.
Scope 2 Market based	1	1	19	2025	District heating emission factors for location and market based are same
Scope 1-2 Market based	**161**	**97**	**113**	**2025**	
Scope 1+2 Location based	**1 096**	**1 133**	**2 364**	**2025**	
Scope 3 - Category 1 Purchased goods and services	3 502	3 091	4 910	2025	
Scope 3 - Category 2 Capital goods	5 125	10 227	7 492	2025	
Scope 3 - Category 3 Fuel- & energy-related activities	408	578	1 273	2025	
Scope 3 - Category 4 Upstream transportation & distribution	350	456	348	2025	
Scope 3 - Category 5 Waste generated in operations	31	24	26	2025	
Scope 3 - Category 6 Business travel	36	67	136	2025	
Scope 3 - Category 7 Employee commuting	72	89	82	2025	
Scope 3 - Category 8 Upstream leased assets	2	1	1	2025	
Scope 3 total	**9526**	**14 532**	**14 267**	**2025**	
Total- Market based Scope 1 + Scope 2 + Scope 3	**9687**	**14 629**	**14 380**		
Total- Location based Scope 1 + Scope 2 + Scope 3	**10 622**	**15 665**	**16 631**		

Scope 1

Scope 1 emissions

Scope 1 represents a smaller portion of the emissions which has seen an overall increase from last year due to a smaller refrigerant leakage at EcoDataCenter 1 of the refrigerant R513A. In total, direct emissions are a marginal increase compared to scope 2 and scope 3. Our Scope 1 emissions primarily arise from testing back-up diesel generators and from refrigerant leakage. We are phasing out fossil fuels by transitioning to HVO100, with a target of more than 99% renewable energy by 2028 which will further decrease Scope 1 emissions.

Refrigerant leaks can cause significant climate impact and must be reported annually to Swedish authorities for companies with more than 14 tons CO_2e in refrigerants. To reduce this risk, we monitor leakage and have introduced chillers using R-717 ammonia (0 GWP) in our newest facilities, improving efficiency while lowering emissions.

Significant changes scope 1 and 2

The main increase in location-based emissions for 2025 is connected to the vast increase in electricity consumption as a natural effect of expanding the business.

Also, during 2025, we started to consume district heating at our site establishment in Borlänge, as well as in the rented office in Stockholm. This added consumption makes a significant YoY increase in district heating category.

Scope 2 emissions from electricity are reported using two accounting approaches: location-based and market-based. The difference reflects how electricity-related emissions are attributed depending on whether contractual instruments (such as renewable energy certificates) are considered.

Location-based emissions represent the average carbon intensity of the electricity grid where consumption occurs. This method reflects the physical reality of the local power system, regardless of whether renewable electricity certificates are purchased.

Market-based emissions, in contrast, account for contractual instruments such as Guarantees of Origin (GoOs), renewable energy certificates, or power purchase agreements (PPAs). This method reflects the emissions associated with the specific electricity products the company has chosen to procure, which can significantly reduce reported Scope 2 emissions when certified renewable electricity is used.

As a result, market-based emissions are typically lower than location-based emissions when renewable electricity certificates are applied, as the emissions factor reflects the contracted renewable supply rather than the average grid mix.

District heating

For district heating, there is no difference between location-based and market-based emissions. This is because district heating systems generally do not use transferable renewable certificates or contractual emission claims in the same way as electricity markets. Emissions are therefore reported based on the actual fuel mix and operational emissions of the heat supplier, making a single accounting approach appropriate. During 2025, there has not been a direct consumption of steam from district heating or any other external suppliers.

GHG emissions Intensity for Data Center Operators (GRI305-4)

As a data center operator, our carbon usage is driven by energy and infrastructure. To more accurately reflect performance, we report our operational carbon intensity using metrics from the EN 50600-4 series, which are widely recognized in our sector:

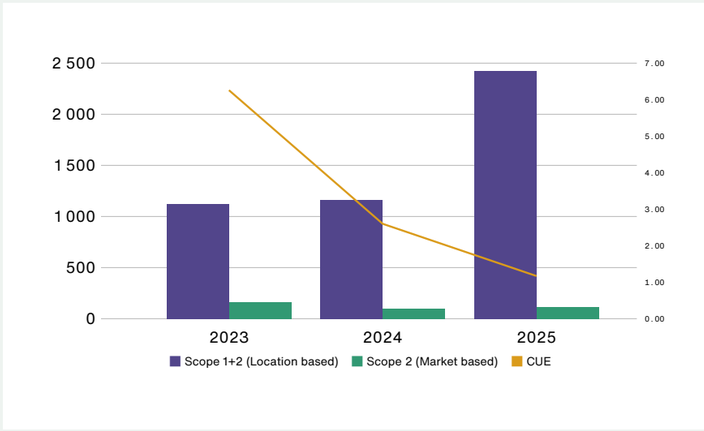
- **Carbon Usage Effectiveness (CUE):** Total scope 1 and scope 2 carbon usage divided by IT equipment energy, indicating overall efficiency.

These indicators provide a more relevant view of carbon intensity than general aggregate reports. They support comparability within the industry and reflect continuous improvement efforts to improve operational efficiency, in line with GRI's intent to report material and decision-useful information.

Table 2.7 - Carbon usage effectiveness (CUE)	Total emissions (tovns CO_2e) Scope 1+2, Market Based	Total IT Load GWh	CUE g CO2e/kWh
2023	161.00	25.73	6.26
2024	97.00	37.34	2.60
2025	112.64	95.97	1.17

Scope 1+2+CUE

The graph below shows that carbon intensity is improving as business is growing. The total emissions are increasing however we see a significant decrease in carbon emissions per kWh of IT load served.



Powering AI infrastructure while strengthening the energy system

60.6092° N 15.6273° E / 60.4858° N 15.4371° E

→→ AI is rapidly becoming a foundational capability for society and industry. From healthcare and education to manufacturing and energy optimization. Data centers are the physical infrastructure that makes AI and digital services possible, converting electricity into secure computing capacity that supports both local businesses and global innovation.

In the Nordics, electricity demand is projected to rise steeply in the near term, with data-center expansion emerging as a key driver during 2026-2028. Market outlook scenarios indicate that data centers could grow from around today's share of national load ~2-3% to a materially larger share ~7-12% by 2030, with particularly strong development expected across Sweden, Finland and Norway. At the same time, the Nordic energy market is shaped by constraints in generation buildout timing and by transmission bottlenecks contributes to price differences between regions. As grid reinforcement and cross-border integration progress, local price dynamics are increasingly influenced by pan-Nordic demand and transmission conditions.

As a large electricity consumer, EcoDataCenter recognizes the responsibility that comes with operating energy-intensive infrastructure. Our ambition is to ensure that the growth of digital infrastructure takes place in a way that maintains and develops the stability and long-term resilience of the energy system. This includes actively considering how we source energy, how our operations interact with local energy markets, and how digital infrastructure can contribute positively to the communities and regions where we operate.

We therefore view energy use not only as an operational requirement, but also as an area where responsible stewardship is essential. Through close engagement with the surrounding energy ecosystem and enabling solutions such as the reuse of excess heat in local energy systems, we seek to ensure that data center development contributes to broader societal value.

We also recognize that maintaining trust requires transparency and accountability. As demand for digital infrastructure grows, data centers must demonstrate that they are managing their energy footprint responsibly and engaging constructively with stakeholders to ensure that digital growth support, rather than challenge, the broader energy transition. ←←

Scope 3

Scope 3 emissions overview

Scope 3 emissions represent indirect greenhouse gas emissions occurring across EcoDataCenter's value chain, outside of direct operations and purchased energy. These emissions reflect the broader climate impact of suppliers, infrastructure investments, logistics, and employee activities.

The Scope 3 footprint is dominated by upstream value-chain activities, particularly Capital Goods (Category 2) and Purchased Goods and Services (Category 1). This highlights the significant impact of data center construction, IT hardware procurement, and supplier manufacturing processes on overall emissions. These categories reflect long-lived infrastructure investments and technology assets that are essential to scaling digital capacity.

Fuel- and energy-related activities (Category 3) also contribute a meaningful share, indicating upstream emissions associated with energy production and supply. Upstream transportation and distribution (Category 4) and selected sub-categories within Scope 3 (e.g., 3.3b and 3.3c) represent smaller but relevant contributions, linked to logistics, supplier operations, and specific lifecycle stages.

In contrast, employee commuting (Category 7), business travel (Category 6), waste generated in operations (Category 5), and upstream leased assets (Category 8) contribute a relatively minor portion of total Scope 3 emissions. While smaller in magnitude, these categories remain important for operational efficiency, employee engagement, and circularity initiatives.

Strategic implications

The emissions profile indicates that the greatest decarbonization potential lies upstream, particularly in:

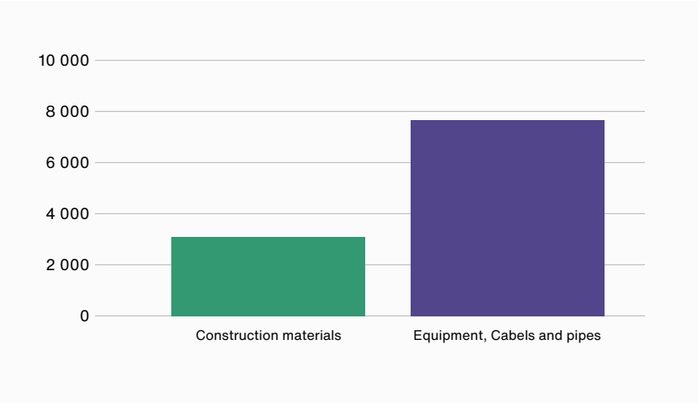
- Low-carbon procurement of DC equipment and construction materials
- Supplier engagement and carbon transparency
- Lifecycle optimization of capital assets
- Circular economy strategies, including reuse, refurbishment, and recycling

EcoDataCenter's Scope 3 strategy therefore prioritizes supplier collaboration, sustainable sourcing, and long-term asset efficiency, ensuring that emissions reductions align with business growth and infrastructure expansion.

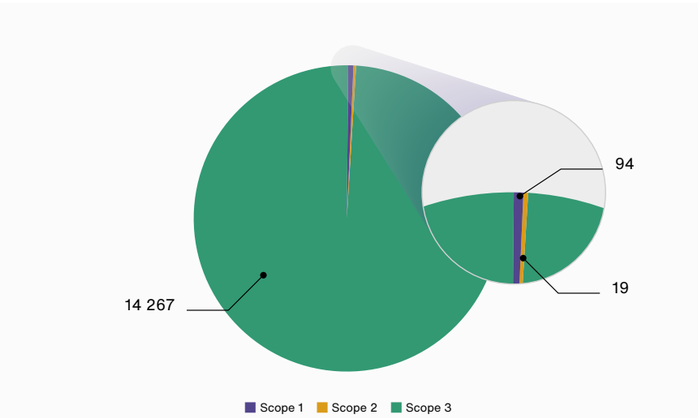
Detailed overview of the embodied carbon emissions from the building commissioned in 2025. Construction material specific impacts for A1-A3 and A5 were addressed in Category 3.1b. Equipment and other hardware impacts for raw material manufacturing (A1-A3) were addressed in Scope 3 category 2. All the upstream transportation impact were addressed in Scope 3 Category 4.

Given the significant developments and changes across the business during the current reporting period, we have not yet established a formal Scope 3 target; however, we plan to define and adopt a time-bound Scope 3 procurement target by the end of 2026.

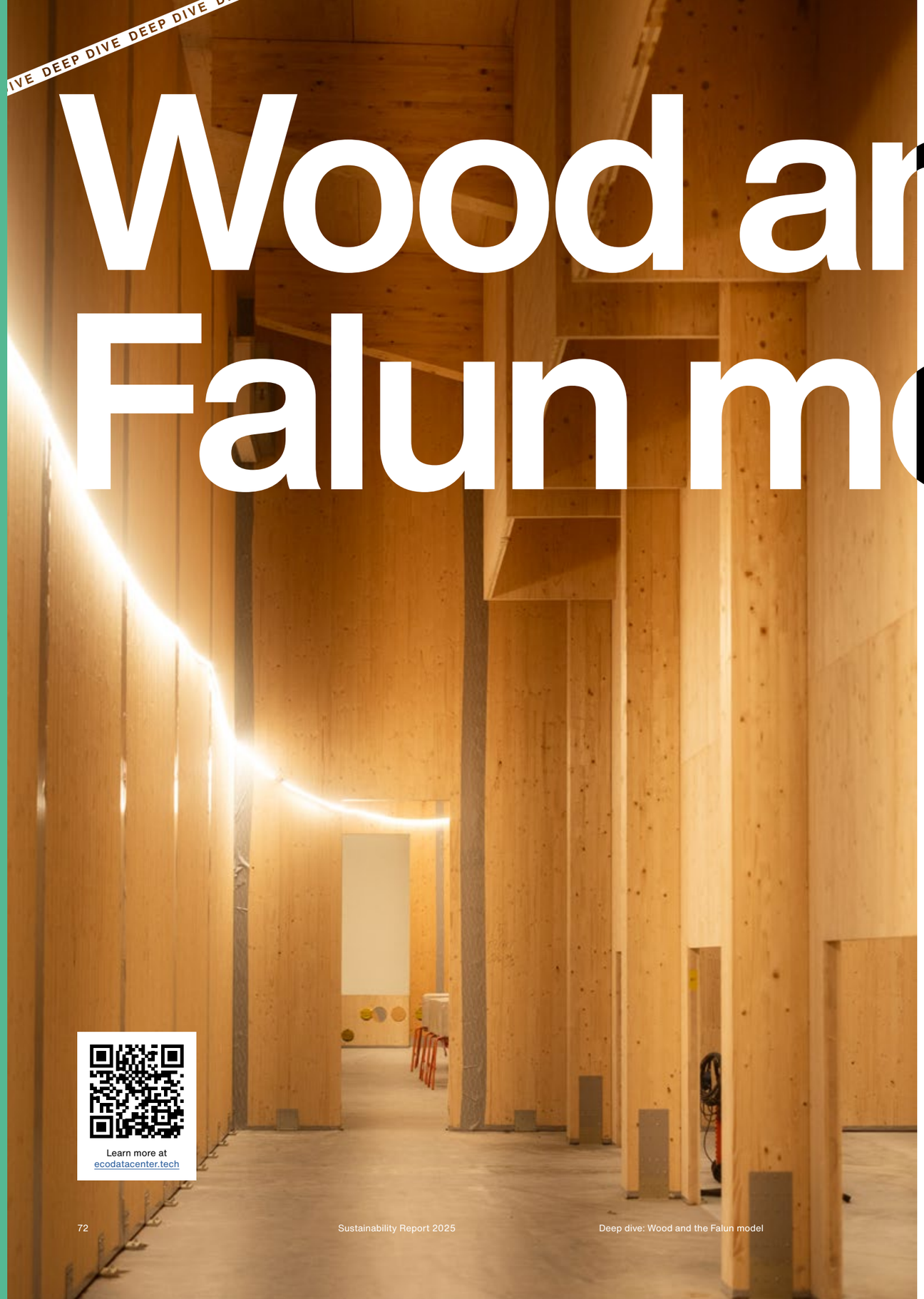
Embodied carbon emission from DCD building comissioned in 2025



Total GHG Emissions per scope



Wood and the Falun model



Learn more at ecodatacenter.tech

→→ At EcoDataCenter, sustainability is not an add-on, it is embedded in how we design, build, and operate our facilities. One of the most defining decisions we have made as a company is to use cross-laminated timber (CLT) as the primary structural material in our data centers.

Steel and concrete have become conventional materials in global construction. Yet the construction sector accounted for approximately 33% of global carbon emissions in 2022, according to research from the Potsdam Institute for Climate Impact Research. Independent scientific reviews show that multi-story buildings constructed with CLT instead of conventional materials can reduce carbon footprints by an average of 40%. The wood used in our facilities is mainly sourced from well-managed Swedish forests, primarily in proximity to our sites in Falun and Borlänge, ensuring short transport distances and high traceability standards.

For EcoDataCenter, this insight is translated into our long-term strategy. Since our founding in 2014, we have systematically developed and scaled wood-based data center construction. In 2019, EcoDataCenter 1 opened as the world's first large-scale data center built primarily from CLT. Today, wood-based structural systems are a core part of our development model, with facilities built using up to 95% wood in the structural frame.

Beyond its environmental profile, CLT provides practical advantages in mission-critical environments. Data centers are technically complex and frequently require adjustments late in the fit-out process. Compared to concrete construction, where penetration and structural decisions must be finalized before casting, CLT enables greater flexibility and adaptability.

As Mattias Rantakallio from our construction partner ByggPartner explains:

"There is too much piping to do this in concrete. There is not enough time to decide on all the holes for pipes before the material and casting of wall elements are ordered."

This flexibility has proven essential as we support increasingly advanced AI deployments, including Europe's first liquid-cooled Nvidia GB200 cluster at EcoDataCetner 1 in Falun during 2025. Since 2017, we have worked closely with partners to industrialize wood-based mission-critical construction. What was initially considered unconventional has now been demonstrated at scale.

The usage of wood significantly changes the carbon profile of large-scale digital infrastructure. Life Cycle Assessments show up to 60% less embodied carbon in construction compared to conventional builds. In Data Center 1D in Falun alone, approximately 2,650 tons of biogenic CO_2e are stored within the structure. Internal project data further indicates that wooden construction can reduce build times by up to 30%, improving capital efficiency while accelerating time to operation.

By devoting ourselves to the benefits of wood, we want to show that digital infrastructure can meet exponential computing demand while significantly reducing its environmental footprint.

For more info about how we work with wood and its many aspects, please see our full white paper Why wood works. ←←

What is the climate impact of AI?

Understanding kg CO_2e per token: Why context matters more than the number

→→ As AI scales rapidly, so does the relevance of measuring its full environmental impact. As a data center operator supporting AI workloads, EcoDataCenter has both an interest and a responsibility in how climate impact of artificial intelligence is measured and understood. One emerging metric, kg CO_2e per token, attempts to link digital activity to climate impact. While intuitive, this metric requires careful interpretation to be meaningful.

A token is a unit of text processed by a language model. Converting tokens to climate impact requires connecting several layers: computational work performed by IT hardware, electricity consumed, the carbon intensity of the electricity source, and the infrastructure efficiency of the data center.

This layered structure shows that kg CO_2e per token is not intrinsic to a model; it's a derived outcome that depends entirely on where and how computation happens. In simplified terms:

kg CO_2e per token ≈ (energy per token × carbon intensity of electricity) + amortized embodied emissions

Why a Single Number Is Misleading
Two identical prompts to the same model can result in vastly different emissions based on location (low-carbon grids versus fossil-intensive grids), operation type (training versus inference), infrastructure design (PUE, cooling, redundancy), and hardware efficiency. Without context, quoting a single value risks creating a false sense of precision.

What Makes Comparisons Meaningful
Responsible use of this metric requires transparency on energy consumption per workload, electricity carbon intensity and sourcing, data center PUE and utilization rates, and treatment of embodied emissions.

EcoDataCenter's Approach: System-Level Impact Reduction
Reducing AI's climate impact is about fundamental infrastructure choices:

- **Fossil-free operations:** A predominantly hydro and wind energy mix from the Swedish grid keeps operational emissions dramatically lower than global averages.
- **Low-impact construction:** Building in wood substantially reduces construction-phase emissions compared to conventional materials.
- **Designed for longevity:** Dual air and liquid cooling infrastructure allows technology upgrades without rebuilding, improving carbon intensity per token over time.
- **Full transparency:** Monthly climate reports give customers complete emissions data across all categories, enabling accurate accounting of AI workloads.

Key takeaway
kg CO_2e per token can be a useful metric, but only when it reflects real system boundaries and honest assumptions. For customers deploying AI at scale, the choice of infrastructure provider, location, and energy source determines the majority of lifetime climate impact.

Meaningful sustainability requires looking beyond efficiency claims to ask: Where is the electricity coming from? What is excluded from the calculation? And who's willing to share the complete picture?

We support this development through openness, data transparency, and collaboration around improved measurement standards, ensuring that the rapid expansion of AI can be aligned with long-term sustainability goals. ←←

The three key layers governing impact

01	02	03
Embodied Carbon One-time emissions from construction, data center equipment, and IT hardware. Significant, but typically smaller than operational impacts in fossil-intensive regions.	**Operational Energy** The dominant and most variable factor. Location and energy source create order-of-magnitude differences in emissions for identical workloads.	**Application-Specific Factors** Training versus inference profiles, task complexity (video/image generation versus text), and model design choices such as quantization and distillation all materially affect energy per unit of output.

Scope 4

Heat recovery and related emissions

We are convinced that a symbiotic industrial system, where excess energy is used efficiently, creates greater long-term value than simply releasing it. While disposal may be cost effective in the short term, optimizing resources such as waste heat provides both environmental and economic benefits over time. Our ambition is to give the waste heat from our data centers a second life. In Falun, we sell waste heat for pellet production. In Stockholm, we supply it to the district heating network using a heat pump to reach the required temperature. We also use waste heat to warm our own facilities.

Our investments in liquid based cooling systems enable more efficient energy use compared to many conventional solutions. To capture this broader impact beyond our own energy consumption, we assess and report Scope 4 emissions.

In our calculations, we do not include potential savings in boiler capacity for the district heating provider, nor the negative impacts from additional piping and equipment at our site. Heat reuse and resulting emissions[1] are calculated based on replacing new district heating production with our waste heat. This means, for each location where we had active waste heat reusage in 2025, we have matched our waste heat delivery with the impact of delivery of corresponding volume district heating in that same system, using the emission factors for each district heating system respectively. Compared to previous years, heat reuse related emissions have decreased, mainly because our divested Stockholm site was operational for only six months. In 2025, the energy demand of the recipient was partly met by other sources. However, we remain optimistic that demand for our waste heat will increase as alternative fuels, particularly biofuels, become more expensive.

By reusing energy in this way, it does not need to be produced elsewhere, thereby avoiding emissions from additional energy generation. However, the share of reused energy remains relatively low. As we scale our business, we are exploring new opportunities to increase the use of our waste heat.

1. https://www.energiforetagen.se/statistik/fjarrvarmestatistik/miljovardering-av-fjarrvarme/
   Stockholm: 0,0514kg CO2e/kWh, Falun: 0,0196kg CO2e/kWh

Reuse of energy	**Energy recovered (kWh)**		**Emissions related to heat reuse (tons CO2e)**	
	2024	**2025**	**2024**	**2025**
District heating recovery Stockholm	2 495 780	698 330	115	36
District heating recovery Falun	483 674	530 979	3	10
Total	**2 979 454**	**1 229 309**	**118**	**46**

Methodologies and assumptions GHG Emissions

Our GHG emissions are calculated annually, using the Greenhouse Gas Protocol standards for scopes 1, 2, and 3 emissions. We collect activity data from both our own operations and our contracted construction activities. While most of this activity data is collected via our online reporting platform, some scope 3 emission categories are still collected manually. Thus, GHG emission factors and emission calculations related to these activities are managed on our reporting platform. In some cases, certain scope 3 emissions data and calculations are managed manually, such as purchased goods and services, capital goods, upstream transport, business travel, and upstream leased assets. All data and related calculations are reviewed using the 4 eyes principle. In general, our GHG emission factors are from reputable and public databases, such as Boverket, DEFRA, and Energiföretagen. When possible, we do use supplier-specific emission factors for certain fuels and purchased electricity. For some complex capital goods, we also use publicly available EPDs and PEPs. In general, when selecting assumptions or selecting GHG emission factors, we strive to take a conservative approach. We assume a 5% transmission and distribution loss for all purchased electricity and purchased district heating. When detailed data on operational waste or construction waste is missing, we have made assumptions based on the type of waste fraction it is. Scope 3, Category 1a Contractor fuel consumption, the WTW (well-to-wheel) emissions were accounted for.

Reducing emissions in site development

→→ In 2025, EcoDataCenter began construction and development of EcoDataCenter 2 in Kvarnsveden, Borlänge. The site is located on a former paper mill property, a large industrial area with existing infrastructure. With a planned power capacity of at least 246 MW and proximity to the Dalälven river, it is an attractive location for data center operations.

During the year, one focus was to reduce emissions linked to construction and construction logistics by thinking new while making use of the site's existing transport infrastructure.

One important step was the reactivation of the former railway connection into the area. After permitting processes and renovation work, the first train delivery to the site was completed in 2025. While the long-term impact will depend on how widely rail transport can be applied going forward, the railway creates clear opportunities to reduce road transport volumes over time.

The first delivery included ground piping transported together with LOGS Logistics & Terminals AB. The piping was sourced from a Swedish supplier located approximately 950 km north of Borlänge. Most of the transport was completed through the national rail freight network using an electric train, with final transport from the terminal handled by truck running on renewable HVO100 fuel. Compared to a fully fossil-fueled road transport alternative, this resulted in an estimated 85% reduction in CO2e emissions.

EcoDataCenter also continued to increase the share of electric construction equipment. In 2025, Volvo's fully electric L90 loader was used for groundwork at the Kvarnsveden site, showing how new technology can support lower-emission construction where conditions allow. We also installed fast charging stations on site to enable operations of electric construction vehicles.

In parallel, energy efficiency improvements were made in existing buildings on site. By upgrading lighting systems and introducing smarter automation, electricity savings of almost 700 MWh per year were enabled in 2025. These measures reflect a continued focus on improving performance where practical opportunities are identified. ←←

Water (GRI 303)

Water usage for cooling data centers

We use water for cooling our data centers, and typically the use is very low around the year except for during the summer period from mid-June to mid-August when the outside temperatures are high.

Table 2.9 - Water usage effectiveness, EcoDataCenter1	**2023**	**2024**	**2025**
Water use (m³)	19 440	22 755	40 260
IT Load (MWh)	21 441	32 727	95 969
WUE	**0.91**	**0.70**	**0.42**

Benchmarking against CNDCPs WUE_{max} level

WUE_{max} should be considered as it provides a climate- and water-stress-adjusted benchmark for responsible water use in data centers, ensuring that facilities not only minimize water consumption but also align their operations with local environmental constraints and long-term water sustainability. For Falun, Sweden - characterized by a cold climate and low regional water stress - the Climate Neutral Data Centre Pact defines a WUE_{max} threshold of approximately **2.0 L/kWh** when potable water is used. This benchmark reflects favorable hydrological conditions while maintaining strong incentives for water-efficient cooling and the adoption of non-potable water sources.

Water use (m³)

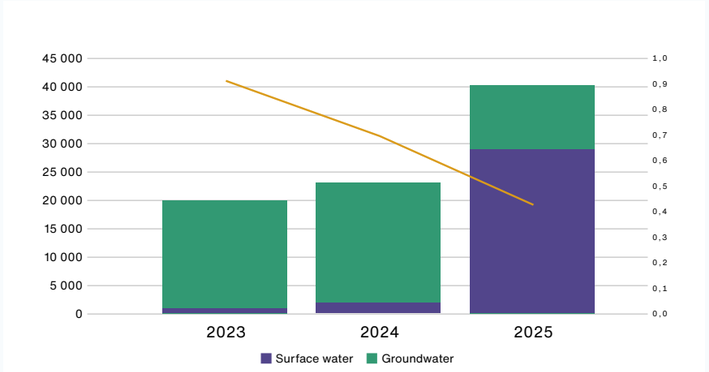


Table 2.10 - Water consumption (m³)	**All areas**			**Areas under water stress**		
	2023	**2024**	**2025**	**2023**	**2024**	**2025**
Total water withdrawal (m³)	**20 035**	**22 982**	**40 260**	**0%**	**0%**	**0%**
Surface water	595	1 639	28 858	**0%**	**0%**	**0%**
Groundwater	19 440	21 343	11 403	**0%**	**0%**	**0%**
Total water discharged (m³)	**1 461**	**5 215**	**1 544**	**0%**	**0%**	**0%**
Third party water	1 402	5 215	1 544	0%	0%	0%
Surface water	59	---	---	0%	0%	0%
Total water consumption (m³)	**18 574**	**17 767**	**38 717**	**0%**	**0%**	**0%**
Surface water	---	---	28 858	0%	0%	0%
Groundwater	18 574	17 767	9 859	0%	0%	0%

Sources of water

All our withdrawn water is purchased from third party. In Falun we used ground water from the neighboring municipality through a local utility company until 2024. Replacing the ground water with non-potable surface water was a key initiative implemented throughout 2025. During 2025, no water consumption happened from seawater or produced water.

Reducing dependency on groundwater

Total water consumption (m^3)

Evident from the graph above those efforts for reducing the dependence on ground-water and showing results. The share of groundwater has been drastically reduced from 2024 to 2025. Potential improvements by adding heat reuse will further improve water efficiency due to reduce losses by evaporation.

Table 2.11 - Share of groundwater use (%)	**2024**	**2025**
Total water withdrawal (m^3)	22 982	40 260
Groundwater (m^3)	21 343	11 403
	93%	**28%**

Ground water is a precious resource, and in Sweden we have plenty of lakes and surface water. We therefore want to avoid using ground water since this is becoming increasingly scarce, especially during the summer period. Increased temperatures and less areas covered with snow in the winter will lead to larger fluctuations of ground water levels, which will have a social impact on people and their water supply. In Falun we are in the process of replacing the ground water with surface water. We have a target to permanently eliminate the use of ground water for cooling in our future sites. In Falun, we started the work to replace potable ground water with water of poorer quality. We, together with the local water provider, invest in new pipes and an upgrade of the water system for processing water from a nearby lake. Through this investment of roughly 20 MSEK, we strengthened the water infrastructure locally. During 2025, our groundwater usage was 28% (93% in 2024).

The water does not need any chemicals to be cleaned as it is mainly used for cooling. Potable water comes from a different source. While being used by Eco DC, other industry operators could also use the same water infrastructure. We also, through this investment, have supported building the water resilience in the city of Falun by enabling an additional local water supply for industries

Water discharge

Our operations result in very limited water discharge. Water used in our cooling processes evaporates during operation and is therefore not discharged as effluent, which explains why discharge volumes are lower than total water withdrawals.
Water that is discharged primarily consists of domestic wastewater from sanitary facilities (e.g., toilets and sinks). This wastewater is discharged to the municipal sewer system and subsequently treated at publicly operated wastewater treatment plants. Wastewater treatment in Sweden is subject to strict environmental regulation and monitoring, ensuring that effluent quality meets regulatory standards before release to receiving water bodies.

A smaller portion of discharged water originates from cooling processes and is directed to the stormwater system where applicable. Based on the nature of our operations, discharged water is not expected to contain significant concentrations of pollutants beyond typical domestic wastewater characteristics. Our facilities are in regions not classified as water-stressed according to the WRI Aqueduct Water Risk Atlas. We comply with applicable local water and wastewater regulations and monitor our water use and discharge as part of our environmental management practices.

Water risks

Our data centers are in central Sweden where the water risks are low, according to the World Resources Institute tool Aqueduct Water Risk Atlas. Both current and future water risk levels and water stress levels are considered very low in these geographic areas.

Methodology and assumptions for Water data

Water data has been collected and reported by site, based on cross-checking internal water meters with external bills from suppliers. Where we use water for cooling, following estimation has been made explaining destinations of the water. Roughly 98% of the cooling water withdrawn is evaporated (consumed during cooling) and roughly 2% of the remaining water is discharged. While we report on water withdrawal, consumption, and discharge from our operations, we do not yet report on water impacts related to purchased goods, services, or capital goods for construction of our new data centers. In addition to our operational water reporting, we also assess our sites general water risk and water stress levels using the WRI Aqueduct Water Risk Atlas tool.

Circularity

Waste and circularity

EcoDataCenter's most significant waste generation occurs during the construction and adaptation of data centers, particularly from packaging materials. We follow the 3R principle—reduce, reuse, recycle—and aim to minimize waste at the source by designing efficient, long-lasting infrastructure using materials such as wood. Most construction and operational waste is either recycled or used for energy recovery; only a small share typically goes to landfill. Construction waste is managed by certified private contractors, while operational waste is handled by municipal operators controlled by Swedish authorities.

Downstream, electronic waste from customer servers, typically replaced every 3–5 years, is a key impact area. We address this through Reuse partnerships for customers that seek support in responsibly handling their equipment at end-of-life. We also participate in the EU-funded EECONE project, which supports circular solutions for IT equipment. Our design strategy promotes flexibility and longevity, helping reduce the frequency of replacements and supporting a circular value chain.

Our waste (GRI 306)

Construction drives 2025 waste impact

The most significant waste-related impact of 2025 is related to the construction phase of new data center capacity, with two sites being developed in parallel. The key activities leading to waste are building works and fit-out carried out by contractors on site.

Construction waste represents a significant share of total waste volumes, with major streams including wood, combustible waste, gypsum, mixed scrap metal, and plastics. For waste reporting, land excavation is considered out of scope. 100% of the waste has been offsite treatment.

Table 2.12 - Waste by composition, in metric tons (t)

Waste composition	Operational waste	Construction waste	Total	Waste diverted from disposal	Waste directed to disposal
Plastic	5	29	34	34	0
Metals	0	0	0	0	0
Paper / cardboard	12	0	12	12	0
Mixed waste	2	10	13	13	0
Sorted waste for landfill	0	26	26	0	26
Wood	0	232	232	232	0
Gypsum	0	61	61	61	0
Gypsum, contaminated	0	30	30	0	30
Sewage sludge	0	2	2	2	0
Organic waste	4	0	4	4	0
Combustible waste	18	132	149	149	0
Flammable aerosols	0	0	0	0	0
Solvents	0	0	0	0	0
Water-based paint cans	0	0	0	0	0
Waste oils	0	2	2	2	0
Contaminated demolition waste	0	23	23	23	0
Fire extinguishers	0	0	0	0	0
Glass	2	0	2	2	0
Mineral wool	0	1	1	0	1
Garden waste	5	0	5	5	0
WEEE (Waste electronical and electronic equipment)	0	12	12	12	0
Mixed scrap metal	0	72	72	72	0
Contaminated water*	0	886	886	0	886
TOTAL WASTE (tons)	**50**	**1519**	**1569**	**626**	**943**

*Contaminated water related to exceptional environmental incident at the construction site in Borlänge, see more detail in the sections below.

Table 2.13 - Waste DIVERTED FROM disposal, in tons	Operational	Construction	Total (tons)
Hazardous waste			
Preparation for reuse	0,0	0,0	**0,0**
Recycling	0,0	14,3	**14,3**
Other recovery operations	0,0	0,1	**0,1**
Total	**0,0**	**14,4**	**14,4**
Non-Hazardous waste			
Preparation for reuse	0,0	0,0	**0,0**
Recycling	21,8	136,2	**158,0**
Other recovery operations	28,1	425,3	**453,4**
Total	**49,9**	**561,5**	**611,4**
Total diverted from disposal			**625,8**

Table 2.14 - Waste DIRECTED TO disposal, in tons	Operational	Construction	Total (tons)
Hazardous waste			
Landfill	0,0	886,0	**886,0**
Other disposal operations	0,0	0,0	**0,0**
Total	**0,0**	**886,0**	**886,0**
Non-hazardous waste			
Landfill	0,0	57,2	**57,2**
Other disposal operations	0,0	0,0	**0,0**
Total	**0,0**	**57,2**	**57,2**
Total directed to disposal			**943,2**

Our waste targets

40% of waste diverted from disposal

Generally, the majority of waste generated in operations and construction is diverted from disposal through recycling and other recovery operations. However, a significant portion of the total waste directed to disposal in 2025 was linked to an environmental incident at the Borlänge construction site, where a quality issue in supplied concrete increased levels of hexavalent chromium in water. As a precautionary measure, the contaminated water was collected and disposed of as waste to prevent environmental impact. This incident reflects upstream value chain risk (material supply quality) and downstream impacts through specialized waste handling and disposal. This means the 2025 share of waste diverted from disposal went down to 40%, which is to be seen as an exceptional incident as there is no way of handling this waste fraction more responsibly than via disposal.

Remediation of historical land contamination

During the year, excavation works were carried out at EcoDataCenter 2 to remove contaminated soil originating from historical land use prior to the company's ownership of the site. The remediation was performed in consultation with the County Administrative Board (Länsstyrelsen) and in accordance with applicable environmental regulations.

Ahead of construction, approximately 285,000 tons of excavated material were removed and transported to licensed treatment facilities. Most of the masses consisted of less-contaminated soil (<MRR and <KM). In addition, approximately 100,000 tons of moderately contaminated soil (<MKM) and around 42,000 tons of hazardous fractions (>FA) were managed as part of the remediation works, together with a smaller volume of inert fractions.

The excavation, transport, and treatment of these masses relate to the remediation of legacy environmental liabilities associated with historical activities on the site. As such, the associated greenhouse gas emissions are not included in EcoDataCenter's Scope 1–3 emissions inventory, as they do not arise from the company's operational activities or value chain.

We will continue to collaborate closely with the relevant authorities in connection with the future expansion of the site, to ensure that any remaining contaminated ground is identified and managed in accordance with applicable environmental requirements.

Biodiversity (GRI101)

Management of material topic
EcoDataCenter sites are in previously industrialized zones in Sweden. In this assessment, only the two sites within ownership of EcoDC Holding AB (publ) in December 2025 are considered. The two sites, in Falun and Borlänge, are located on previously industrialized land and do not result in direct biodiversity loss.

Although biodiversity impact assessment is part of the EIA process. We also have a commitment to perform assessments to quantify biodiversity of all operational sites, supporting a more comprehensive understanding of our environmental footprint and informing future biodiversity management actions.

Our impact on biodiversity
Environmental assessments conclude that biodiversity impacts are insignificant to low, with comprehensive mitigation measures ensuring protection of nearby ecosystems. No IUCN or nationally red-listed species have habitats affected by operations, and enhanced water management systems contribute to maintaining or improving downstream ecological conditions.

Our operations have limited potential to introduce pollutants, invasive species, pests, or pathogens, and we do not engage in activities that intentionally introduce non-native species. Environmental impacts are assessed mainly through the EIA process. We are not expected to significantly affect species of populations or alter ecological processes outside their natural range of variation, such as salinity or groundwater levels. Potential environmental impacts are managed through environmental management practices and compliance with applicable regulations.

Biodiversity disclosures

Sites with Potential Biodiversity Relevance (GRI 101-5)	**EcoDataCenter 1 (Falun)**	**EcoDataCenter 2 (Borlänge)**
Location	Located in an established industrial area <100 m to residences.	Located in industrial zone; 150–250m to residences
Ecological context	Not near protected areas or Natura 2000 sites. Surroundings are industrial/commercial.	Reserves nearby but no habitat overlaps. Adjacent to Sjöberget Nature Reserve and near Båtstad–Mellsta Nature Reserve and the Dalälven River.
Identification of Biodiversity Impacts (GRI 101-4)		
Site characteristics	Fully exploited industrial area, no protected ecosystems adjacent. Legacy of soil contamination from historical use (heavy metals).	Industrial area, historical contamination (metals and organics) below thresholds.
Nearby ecosystems	Nearby water bodies face existing pressure; no new biodiversity impacts are expected.	Potential risk to the Dalälven River if pollutants are mobilized, though no direct biodiversity loss is anticipated. Reserves nearby but no ecological connectivity.
Management of Biodiversity Impacts / Mitigation Hierarchy GRI 101-2		
Avoid	Development confined to industrial land, avoiding greenfield expansion.	Development confined to industrial land, avoiding greenfield expansion.
Minimize	Measures include sealed stormwater detention ponds, oil separators, runoff redirection from flood-prone areas, and passive rewilding of non-operational zones.	Measures include contained stormwater and firefighting systems, sedimentation and oil separation, double-walled fuel tanks.
Restore	Mass-management and stabilization of legacy materials.	Contaminated soil mass-management plan.
Biodiversity Outcomes (GRI 101-8)		
Impact	No significant biodiversity impacts were observed. Stormwater systems enhance water quality in downstream ecosystems.	No significant impacts are expected on protected areas or species. Adjacent reserves remain unaffected; water-related risks are mitigated.

Overview of site characteristics

Site location	**Type of operation**	**Total area (m2)**	**Control**	**Overlapping areas**	**Adjacent areas**	**Within 5 km**
EcoDataCenter 1 Falun	DC & HQ	170 000	Owned	None	None	1 cultural reserve, 2 nature reserves, 1 national nature conservation area
EcoDataCenter 2 Borlänge	DC, not yet operational	530 000	Owned	None	1 nature reserve	2 nature reserves, 2 water protection areas, 2 national conservation agreement areas
Piteå	DC	16 200	Divested	1 water protection area	None	1 nationally protected area
Stockholm	DC	11 000	Divested	None	None	1 nature reserve & 2 national city parks

Overlapping = located on site. Adjacent to = bordering to site within 1 km . Close proximity = within 5 km. Exact locations of our data centers are not reported, to ensure customer privacy.

Biodiversity impacts in the value chain

Significant potential biodiversity impacts associated with our activities occur primarily upstream in the value chain, particularly in the production of construction materials and the generation of electricity used in our operations. These impacts are difficult to quantify directly; however, life cycle assessments (LCAs) indicate pressures related to acidification and eutrophication, which can negatively affect ecosystems and species.

Acidification impacts are mainly linked to the production of key construction materials such as steel, concrete, aluminum, and wood-based products used in the development of our data centers. Operational electricity use also contributes to biodiversity-related pressures. According to earlier LCAs of our data center developments, a significant share of potential acidification impacts is associated with wind power, while freshwater eutrophication impacts are primarily related to hydro power used in purchased electricity.

We monitor and reassess these potential impacts through life cycle assessments and our annual materiality assessment process.

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Quantifying biodiversity impact

→ EcoDataCenter 1

→→ One of EcoDataCenter's sustainability goals for 2025 was to quantify the biodiversity impact of establishing EcoDataCenter 1 in Falun. To achieve this, we commissioned a CLIMB analysis.

CLIMB is a quantitative model that measures biodiversity value in a defined area and expresses it in CLIMB units (CE). The method builds on Swedish Nature Value Inventories and evaluates factors such as habitat type, area, ecological quality, and landscape context. It allows both baseline calculation and forward-looking scenario modelling, making it a practical decision-support tool for sustainable site development.

The baseline year for the analysis was 2017, before EcoDataCenter's first data centers were established. The results showed that the 17-hectare project area already had relatively low biodiversity value, 3.1 CLIMB units, reflecting its long history of industrial use and hard surfaces. The site's ecological intactness was estimated at around 1 percent, confirming that it was already significantly shaped by human activity.

This baseline is important because it demonstrates that the establishment did not take place on untouched natural land, but in an area with limited existing ecological value.

Two development paths and two different outcomes
The CLIMB analysis evaluated two future scenarios based on our planned layout. The key difference between them lies not in the buildings themselves, but in how green areas, stormwater systems, and vegetation are designed and maintained.

In a more conventional scenario, with short-cut lawns, limited structural diversity, and purely functional stormwater ponds, the biodiversity value of the site remains essentially stable. The total CLIMB units increase slightly from 3.1 to 3.3. This shows that with basic mitigation and standard landscaping, the net impact can be kept close to zero.

In a more ambitious scenario, where green areas are developed as species-rich meadows, native trees and shrubs form layered vegetation, and stormwater ponds are designed with natural edges and habitat value, the results are significantly stronger. Under this approach, the site's biodiversity value increases to 6.7 CLIMB units, corresponding to an 86 percent improvement compared to the baseline.

A clear conclusion
The analysis confirms that we can achieve either a close to zero or a positive net impact on biodiversity at EcoDataCenter 1, depending on how we design and manage the site. Long-term maintenance, ecological design choices, and the quality of green infrastructure determine the outcome.

Key measures include establishing and consistently managing meadow areas instead of conventional lawns, using native species and structurally diverse plantings, designing stormwater ponds with ecological function, ensuring sedum roofs are managed without chemicals, and avoiding invasive species during construction.

The most important insight and lesson learned from the 2025 actions is that biodiversity impact can be measured, managed, and improved. By quantifying our starting point and modelling different futures, we now have a clear evidence base showing how responsible site management can turn a historically industrial area into a place that actively contributes to local biodiversity. This is also why we commit to doing this assessment for all sites once it becomes operational. ←←

Environmental protection on our sites

Continual environmental improvement

We work according to ISO 14001 which means understanding our negative impact on the environment and reducing it through continual improvement. Our activities are also subject to an environmental permit, based on an environmental protection assessment. Hence, there are special conditions for:

- Emissions to air
- Emissions to water
- Management of waste
- Noise

As a part of the environmental permit per establishment, we are obliged to annually report on specific potential negative impacts assessed as part of the permit process.

Chemical management

Chemical management is not considered a material topic, as the risks and impacts from our use of chemicals are assessed as low. Nevertheless, we have instructions and processes in place to ensure chemicals are managed responsibly and with minimal impact on people and the environment.

Our chemical management instruction covers the handling, storage, and use of chemicals, as well as roles and responsibilities and procedures for preventing and managing chemical incidents or leaks. Employees and contractors who purchase or use chemical products must assess associated risks, and only approved chemicals may be used and stored in designated areas.

Chemical use is monitored through internal systems or managed by external contractors where applicable. We apply the substitution principle by avoiding hazardous substances where less harmful alternatives or technologies are available. Tools such as the PRIO prioritization guide from the Swedish Chemicals Agency support the identification and phase-out of hazardous substances.

Chemicals must be properly labeled, and safety data sheets and risk assessments must be available. Where there is a risk of environmental release, protective measures such as spill trays or absorbent materials are used, and procedures are in place to manage potential leaks or incidents.

Phasing out PFAS

To reduce our dependence on PFAS, often called the forever chemicals from their persistence, we have decided to change our standard design for fire extinguishing gas from one containing PFAS to a gas only containing inert gases such as nitrogen and argon for our new developments. This requires changes in building and technical design, but we believe it is the right thing to do to protect people and nature from PFAS, and to mitigate future financial risks related to potential PFAS bans.

Reduce NOx and SOx from alternative generator fuels

Emissions to air, except for GHG emissions, are currently not deemed material. We have emissions into air from combustion of fuels in our back-up generators. The emissions are NOx and CO, hydrocarbons, and particle matter. Although HVO100 reduces NOx and SOx emissions compared to fossil diesel, we recognize that overall air emissions may increase as we expand our operations. At the same time, stricter regulatory requirements in this area are emerging, which we monitor closely. At our operational site, EcoDataCenter 1, we have an established routine for measuring emissions to air, which is done on regular basis.

Dust from construction works

For any work that may lead to dust formation, we have specific procedures to ensure dust is not spread. The dust is controlled through water and salt reducing the air pollution for neighbors and employees. Dust is not deemed a material topic to us.

Noise levels

We check our noise levels and report this to the municipality when testing the generators and when changes in operations may lead to higher noise levels. When a new data center is built, near-field measurements and calculations are made. The noisiest phase is the construction period, and we continuously monitor noise levels through installed meters at the site and at the nearest residential areas. At the time being, noise levels are not deemed a material topic to us.

Climate risks

Overall, physical climate risks are not considered material to our operations. We have conducted detailed climate risk assessments for both EcoDataCenter 1 in Falun and EcoDataCenter 2 in Borlänge. In both cases, no high-risk climate findings were identified. These assessments were conducted using external tools and reputable sources such as SMHI, the World Bank, UN, and WRI, and were supported by input from an external company as part of the Environmental Impact Assessment (EIA) process.

The assessments indicate that the financial impacts from physical climate risks are generally low to medium, and low when considering the mitigation measures and controls we have implemented. Most chronic and acute risks were categorized as low, with a limited number assessed as medium, and none assessed as high.

The main medium-rated risks relate to groundwater availability, heat waves, and heavy precipitation. Groundwater levels are typically lowest during periods of highest cooling demand, particularly in July and August, which may also create reputational risks if not properly managed. As a result, we have decided not to use groundwater permanently for future sites, reducing both physical and transition-related risks. Water-related impacts are addressed further in the Water section of this report.

Transition risks are primarily linked to regulatory developments and stakeholder expectations. As a large electricity user in an increasingly electrified society, we recognize the potential for reputational risk if power becomes scarce. We monitor these developments regularly and evaluate ways of supporting renewable power production and grid resilience.

When taking mitigating actions into account, the financial implications from physical climate risks are assessed as negligible to low. The assessment included consideration of a high-emission climate scenario (RCP 8.5) where available.

We will continue to complete climate risk assessments for new sites as part of our development process.

Social
Care for people

At EcoDataCenter, we believe that long-term success depends on how we care for people. We are committed to providing a safe, inclusive, and supportive workplace for our employees and contractors, while creating a positive impact for our customers and the communities where we operate.

This means ensuring that employees are respected, empowered, and able to thrive, while delivering reliable, high-quality services that meet our customers' expectations.

Through strong leadership, responsible business practices, and continuous dialogue, we aim to create positive social impact, with a particular focus on the local communities where our data centers are located. By working closely with local stakeholders, we seek to create long-term value through job creation, knowledge sharing, and responsible resource use.

Performance against targets
The following section outlines the targets, metrics, and controls used to track our performance. Our social strategy and related targets have been shaped in dialogue with key stakeholders, including our owners, municipalities, employees, and financing partners.

The current targets were established in 2024. During 2025 and early 2026, selected KPIs have been refined to better reflect performance and improve tracking. These updates are presented as part of this report.

Performance against targets

Material topic	Target or KPI	2023	2024	2025	TREND	Comment
Attraction and retention of talent	Maintain Employee satisfaction above 80	86	83	81	→	Employee Satisfaction index above goal level for 2025. First measures, starting at the end of 2025 will serve as baseline for target setting.
Local community and stakeholders	Maintain Customer satisfaction score above 80	84	88	71	→	Customer satisfaction score dropped in 2025. The decrease was however not reflected in the weighted NPS, which was 80,4.
Diversity	Minimum 20% Women in the whole company by end of 2028	17% women, 83% men (including consultants)	16% women, 84% men (including consultants)	18% women, 82% men (including consultants)	→	In 2025, the overall gender distribution developed positively. However, recruitment into managerial positions was limited, and the hires made during the year shifted the gender balance in the opposite direction. This remains a focus area going forward.
	Minimum 30% Women in the executive management team by end of 2028	25% women, 75% men	20% women 80% men	10% women 90% men	↘	
	Minimum 30% Women in managerial positions by end of 2028	19% women 81% men (including executive management team)	17% women 83% men (including executive management team)	13% women 87% men (including executive management team)	↘	
Health & Safety	Third-party validation of occupational health and safety system according to ISO 45001 certification by end of 2025	N/A	Delay in implementation	Planned for 2026	↘	**Work is ongoing and certification planned during 2026.**

Status towards commitments

Material topic	Target or KPI	TREND	Comment
Local communities and stakeholders	Apprenticeships in our own operations and in all our sites for construction works	↑	Both our sites have had apprenticeships and student workers in 2025.
	Local contractors and suppliers at all our own operations and construction sites	↑	>50% of our spend went to local contractors for our construction works in Falun and Borlänge.
Training and Development	Sustainability training offered to all new employees.	↑	Sustainability training has been performed as part of the onboarding package in 2025.

Our employees

Workforce overview

EcoDataCenter had 85 people in total in its workforce at the end of 2025, where 79 were employees and 6 were consultants. Employees are individuals who are in an employment relationship with the organization, according to national law or practice. Workers who are not employees are agency workers, apprentices, contractors, sub-contractors, self-employed people, and other people working for organizations other than the reporting organization. The total workforce is currently 18% women (15 people) and 82% men (70 people). Although EcoDataCenter is characterized by a predominantly male workforce, we do strive to increase female representation throughout all levels of the company.

The total workforce includes people of various ages but predominantly consists of people between the ages of 30 and 50. Additional information about the workforce, hiring, and turnover can be found in the tables below. All data about the workforce presented in the tables below was extracted from the HR system and calculated using a simple headcount method by the Human Resources department after the end of 2025. Since we are a small and growing company, the total workforce is quite small and, in some cases, it is dependent on external consultants

We have not divided workers per region because of the small population and that individuals can easily identify.

Summary of workforce by type of employment

Type of employement	Men	Women
Permanent employees (excluding consultants)	64	15
Consultants	6	0
Temporary employees	0	0
Non-guranteed hours employees	0	0

Type of employement (time)	Men	Women
Full-time employees	64	15
Part-time employees	0	0
Full-time consultants	6	0
Part-time consultants	0	0

GRI 405-1: Diversity of governance bodies and employees

	Men		Women	
Total workers (including consultants)	70	82%	15	18%
Total employees (excluding consultants)	64	81%	15	19%
Number of hires	20	71%	8	29%
Number of turnover	5	63%	3	38%

Workforce by age,gender and type of employment

GRI 405-1: Diversity of governance bodies and employees

	under 30		30 to 50		over 50	
Total workers (including consultants)	11	13%	48	56%	26	31%
Total employees (excluding consultants)	11	14%	46	58%	22	28%
Number of hires	2	7%	21	78%	4	15%
Number of turnover	1	13%	5	63%	2,0	25%

Diversity, equity and inclusion

Science shows that workforce diversity increases creativity, broadens perspectives, and strengthens competitiveness. We are committed to a welcoming and inclusive workplace where everyone feels valued, respected, and heard. We promote equal opportunities regardless of sex, gender, ethnicity, religion or belief, disability, sexual orientation, or age.

Our work is guided by Swedish legislation, our Diversity and Equal Treatment Policy, and our Employee Handbook. Complaints related to discrimination can be raised with a manager, workers' representative, union, via our whistleblowing function (including anonymously), or to the Swedish Work Environment Authority. All reported incidents are investigated by management and HR.

We apply an inclusive recruitment process covering hiring, promotion, salary setting, and onboarding. Inclusion and anti-discrimination awareness form part of onboarding, and managers receive training in anti-discrimination, harassment, and workplace victimization.

Zero cases of discrimination were reported or identified during 2021–2025. Our office is wheelchair accessible.

Gender diversity

The data center industry remains heavily male-dominated, which is also reflected in our current workforce composition. According to Uptime Institute research, women represent approximately 8% of staff in many data center operations teams, highlighting a persistent gender imbalance across the sector.

We have set clear gender diversity targets. By 2028, we aim for women to represent 20% of our total workforce and 30% of both managerial positions and our executive management team. We recognize these as ambitious targets given current industry benchmarks and the limited availability of specialized competence in the sector.

However, as we and the industry continue to grow, broadening the talent pool is both necessary and strategic. To support this development, we collaborate with local contractors and partners to engage proactively with youth and educational institutions, strengthening the attractiveness of the data center sector and its related career paths.

GRI405-1 Diversity of governance bodies and employees	**Men**		**Women**	
Board of Directors	6	100%	0	0%
Executive Management	9	90%	1	10%
Managerial positions (excl. executive management)	12	86%	2	14%
Managerial positions (incl. executive management)	21	87%	3	13%
All employees (excl. Executive management & managerial positions)	43	78%	12	22%
All employees (Incl. Executive management & managerial positions)	64	81%	15	19%

2025 age diversity of employees (incl. consultants)	**<30**	**30 - 50**	**>50**
Board of Directors	0	4	2
Executive Management	0	7	3
Managerial positions (excl. executive management)	1	3	3
All employees (excl. executive management & managerial positions)	10	37	16

Age diversity as competitive advantage

→→ EcoDataCenter is growing rapidly. With new colleagues expected to join at a pace of nearly one per week, we are scaling both our Falun and Borlänge sites. This expansion requires not only technical capacity and infrastructure, but also people. Competence is becoming one of the most critical factors for our continued development.

At the same time, Sweden and Dalarna face a growing skills shortage. Industry investments are accelerating, and the demand for engineers, technicians, operators, project managers, and specialists is rising sharply. To succeed, we cannot afford to limit our recruitment base or overlook talent that is already available in society.

That is why EcoDataCenter has joined Dalainitiativet, led by Dalarna Science Park together with companies such as Boliden, Hitachi Energy, SSAB and Stora Enso Fors. The initiative aims to challenge ageism in the labor market and highlight the value of experienced professionals. Research shows that age is one of the most common barriers in Swedish recruitment, and that candidates are often screened out early in hiring processes not due to lack of competence, but due to outdated perceptions about learning ability and adaptability.

For us, this is not only a social issue. It is a business-critical question. Experience brings technical knowledge, safety awareness, quality focus and problem-solving ability built over decades. In a data center environment, where reliability, resilience and precision are essential, these capabilities are highly valuable. Age-diverse teams strengthen performance, reduce risk, and create stronger knowledge transfer across generations.

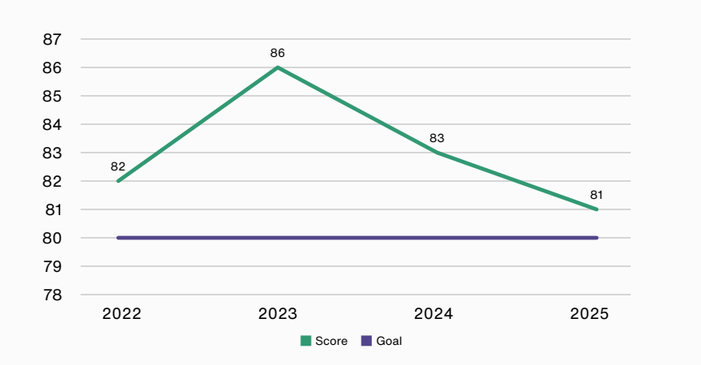
In 2025, Dalainitiativet was invited to Sweden's national parliament. EcoDataCenter participated in the session, where our Chief People Officer Annika Lidefelt spoke about the importance of including people of all ages and backgrounds in the transition towards a more sustainable and competitive industrial Sweden. Being present in the Riksdag was not only an honour, but also a clear signal that age diversity and access to competence must be treated as a strategic priority at national level.

We believe that the future of sustainable digital infrastructure will require both innovation and experience. By actively promoting age diversity, we aim to broaden access to talent, strengthen our organisation, and contribute to a labour market where competence is valued above stereotypes. If Sweden is to remain competitive, and if regions like Dalarna are to continue to grow, we must ensure that no part of the workforce is left behind. ←←

Employee satisfaction

Employee satisfaction KPI

Up until 2025, employee satisfaction has been the leading KPI to examine overall employee satisfaction. The target level of 80 in satisfaction index was reached for 2025, which is very positive. However, during 2025 it has been decided that Employee net promotor score (ENPS) serves as better indicators for overall employee satisfaction. Hence, a new baseline and updated target levels are being developed during 2026.



Family-friendly parental leave

Discrimination during recruitment because of family plans is illegal in Sweden. In fact, Sweden has some of the most generous parental leaves in the world, and to be home with the children is a legal right during more than one year for the parents. On top of the generous family-friendly legislation in Sweden, EcoDataCenter also offers extra compensation for parents, ensuring they will get 80% of their pay during their parental leave. In 2025, mainly men were on parental leave, and this also comes naturally as our workforce is predominantly men. The rate of employees returning to work after parental leave was 100% in 2025. The rate of retention of employees retained 12 months after returning to work following a period of parental leave was 100% in 2025.

GRI401-3: Parental leave

2025 summary of parental leave by gender	**Men**	**Women**
Number of employees entitled to parental leave	64	15
Number of employees who used parental leave	11	3
Number of employees who returned from parental leave	11	2
Number of employees who returned from parental leave (and were still employed after 12 months)	11	2

Working conditions, unions, and collective bargaining

Swedish labour market model

EcoDataCenter operates under Swedish labour legislation and collective bargaining agreements, which regulate key working conditions such as working hours, wages, overtime, vacation, and workplace arrangements. All employees have the right to freely associate and join trade unions, and 100% of our employees (except the CEO) are covered by a collective bargaining agreement.

We maintain an ongoing dialogue with employee representatives in line with the Swedish labour market model. An employee representative and a joint work environment committee regularly meet with the employer to address health, safety, and wellbeing in the workplace. Employees or unions can also contact the Swedish Work Environment Authority (Arbetsmiljöverket), which has the mandate to conduct inspections if needed.

The risks related to collective bargaining and freedom of association in our own operations and among Tier 1 suppliers are considered low, as most operate within Sweden's regulatory framework. Potential risks may exist further up the supply chain.

Notice periods for changes

EcoDataCenter operates in accordance with Swedish labour legislation. Significant operational changes that may affect employees are handled through dialogue and negotiation with relevant trade unions in line with applicable laws and established labour practices. Notice periods and consultation requirements follow the provisions set out in our collective bargaining agreement, including specific rules for changes to working schedules and termination of employment. In cases of larger workforce reductions, the relevant Swedish authorities are notified in accordance with legal requirements.

Salary and remuneration

We have all our operations in Sweden where minimum wages don't exist as in many other countries. In general, this also applies to temporary workers and contractors. The highest governance body, the board, is not involved in remuneration policies, only for the CEO. How we set salaries and remuneration are decided by the collective bargaining agreement where it is stipulated what general factors decide the remuneration. The union is one key stakeholder in remuneration policies for the company, but also the employees get to have a say. For executive managers, the salary and incentive programs is decided by the CEO with support from HR. For suppliers and contractors, we do not require collective bargaining agreements, but we ask for similar agreements and require them to follow Swedish law whenever working on our sites.

Equal pay

Equal pay is regulated by law, and we do an annual salary mapping of men and women to ensure there are no unreasonable differences in salary between men and women. Unreasonable differences can be that the salary differs for two individuals with the same education and experience. The mapping is documented and stored. We do not have a bonus scheme for any person in the company. Due to our small workforce, we currently do not have enough data to do a statistical comparison between men and women in the same role. While the entire organization expanded during 2025 as compared to 2024, yet the number of people within comparable roles remained low, and most new hires were addition of new specialist roles or additional management levels. The ratio of women's basic salary to men's employees and managerial staff is presented in the table below. For 2025, the average woman employee earns 72% of the average employee salary for men. The average woman in a managerial position earns 61% of the average salary in managerial positions for men. As mentioned above, the difference is primarily attributable to the distribution of employees across seniority levels rather than differences within comparable roles. Because of the small number of employees, we have chosen not to break down the figures by site of operations.

Ratio of basic Salary

GRI 405-2: Diversity & Equal Opportunity

Employee category	Ratio of basic salary of women to men
Employee	72%
Managerial positions (including executive management team)	61%

Performance appraisal

All employees receive annual performance reviews from their managers, and these reviews are stored centrally, making it possible to monitor and report on. During 2025, performance reviews were documented for most employees. Full-time consultants are also entitled to performance review and development talk. We have chosen not to break down these figures per employee category, because the numbers are too small, and people can be identified too easily. It should also be noted that certain employees which were hired during 2025 may not have an annual performance review until a later date, after they have worked for a sufficient period.

GRI 404-3 : Training & Education

2025 performance reviews by gender	Men	Women
Number of employees that received performance reviews	39	6
Number of total employees	64	15
Percentage of employees that received performance reviews	61%	40%

2025 performance reviews by age	<30	30 - 50	>50
Number of employees that received performance reviews	3	24	17
Number of total employees	11	48	26
Percentage of employees that received performance reviews	27%	50%	65%

Ratio of annual compensation

In 2025: The CEO's annual compensation vs median annual compensation excluding the CEO was 371%. In the same year, the highest paid non-CEO vs the median annual compensation for the employees (except the highest paid and the CEO) was 307%. The highest paid increase was +6,19%, and the median pay increase was +3,22%. The data was extracted from actual salary revision documentation.

Employee development and training

To build and develop a competent and motivated workforce is material to our success as a company, where development and training play an instrumental part. Our employees' development is managed through annual performance development assessments where we look back at the previous year and look ahead to what future training or other types of personal development are needed. We also have regular meetings between employees and managers. Development is an ongoing process, and we encourage our employees to grow.

According to Swedish law, any employee has the right to study and take a break from work and then come back. All new employees complete onboarding training, including an introduction to the Code of Conduct. We have started developing EcoDataCenter Academy, a set of internal training courses in various levels. Training hours during 2025 were not documented in all cases, but the data in the tables below show the recorded training hours, provided by the HR department. Training records were monitored for 2025 in our HR system. We got some of the training hours data from our training platform.

During 2025, average training hours per man were 5.2 hours and average training hours per woman were 6.1. But men received more total training hours in general during 2025, which is reasonable considering the percentage of male employees is much higher than the percentage of women. Employees and managers reported similar average amounts of training hours during 2024. We held a sustainability workshop with all employees invited, and a sustainability training has been included as a part of onboarding.

We do know that not all training and competence development activities within the company are being recorded, why the reported numbers are low.

During 2025, it has been decided to introduce an annual professional development allowance of SEK 15,000 per employee to further support individualized competence development, complementing the company's existing training initiatives. This initiative is expected to increase the total number of training hours per employee for upcoming years.

In the case of need for transition assistance programs to facilitate continued employability, we would do this on a case-by-case basis. We would also support employees' career endings resulting from retirement or termination of employment.

GRI 404-1: Training & Education

Type of training	Training hours for men	Training hours for women
Standards employee training	332	92
Managerial training	71	22
Sustainability training	45	11

Gender	Average training hours per person
Men	5.2
Women	6.1

Employee type	Average training hours per person
Employee	6.0
Manager	3.9

Our engagement in society

EcoDataCenter actively contributes to the local communities where we operate by employing local staff and collaborating with local contractors. During 2025, two new data centers in Falun and the mega campus in Borlänge are being built with local labor and suppliers as most of the construction workforce. Over half of EcoDataCenter's expenditure goes to companies based in the local area, helping to create jobs, support small businesses, and strengthen communities. Looking ahead, on average, one person per week will join the company directly or indirectly through the value chain in the coming years. Also, in 2025, EcoDataCenter launched the Powering Communities fund, supporting local initiatives in our region of operations.

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Powering Communities Project cases of 2025

→→ The Powering Communities Fund was launched to ensure that our establishments also drive meaningful progress locally. The initiative aims to encourage children and young people to learn, explore with confidence, and develop the courage to challenge the world around them. From Borlänge and Falun, we build high-performance digital infrastructure that powers global innovation. We are committed to ensuring that our presence in the region delivers tangible benefits to society. The strong sense of engagement and collaboration in Dalarna inspires us to contribute in ways that create shared value.

During 2025, the fund supported several local initiatives. It partnered with IK Brage in Borlänge to help arrange the annual DaleCarlia Cup, one of Sweden's largest youth football tournaments. It also supported a local hockey club near the Kvarnsveden megacampus in launching a women's team. In Falun, the fund contributed to Hela Falun, an organisation providing meaningful activities and safe meeting places for young people.

Investing in creativity and curiosity among future generations contributes to lasting, positive change. Through this fund, we seek to create more opportunities and environments where people in Dalarna can grow and thrive. ←←

Learn more at
ecodatacenter.tech

Customer satisfaction and services

Customer feedback plays a central role

Happy customers are at the core of everything we do and a key driver of our long term success. Understanding how our customers perceive us is important to our continuous improvement and long term success. We assess customer experience annually using Net Promoter Score (NPS) as a key performance indicator.

In 2025, the NPS declined and fell below our internal target level of 80. However, the weighted NPS, where customer size is considered, amounted to 80.44. We believe the weighted result provides a more balanced reflection of our business, as it takes into account the relative scope of each partnership.

Our NPS scores continue to compare well with available industry benchmarks. NPS benchmarks vary depending on segment and methodology, however technology companies typically report NPS scores in the range of 30 to 40, with scores above 50 widely regarded as strong. While comparisons should be interpreted with caution, this is an indication that customer satisfaction remains an area of strength for us.

The annual customer satisfaction survey also shows that a high proportion of customers report being satisfied or very satisfied with our services. The decrease in the unweighted NPS is primarily linked to slightly lower ratings from smaller customers, although feedback from this segment remains largely positive and overall satisfaction levels remain high.

Customer feedback plays a central role in our strategic development. Insights gathered are actively followed up and integrated into decision making across the organisation.

Smart hands Remote hands

We offer several of our customers remote services, reducing travelling and thereby GHG emissions for our customers. Our Remote Hands and Smart Hands services cover everything from simple tasks like cabling and rack installation to more advanced operations. It is performed by a group of staff with broad and solid knowledge about data centers and can be customized to fit the client's needs.

Climate reporting

We provide our Climate report and the methodology behind it to help our customers report their Scope 3 emissions from our data centers, a requirement if material according to CSRD or other relevant legislation. In our Climate and Water report, we will share our customers' share of emissions and water use coming from running their equipment in our data centers. We also account for the embodied carbon emissions. The buildings, the infrastructure, the staff working in our company, and the business travel have also been allocated to our customers' data for more transparency. We have created a methodology based on the GHG protocol and applied our scope 3 emissions to our customers' data, inspired by the carbon accounting methodology developed by the E-liability institute.

Occupational Health and Safety (GRI 403)

Healthy and safe work environment

Work environment management is an integrated part of our work and the decisions we make. Creating and maintaining a healthy and safe work environment is a high priority for us, so everyone comes home safely.

Occupational health and safety management system (GRI 403-1)

EcoDataCenter's health and safety manual describes how we work to create a good and safe work environment. The manual is based on the Work Environment Act (AML) and associated regulations (AFS) from the Swedish Work Environment Authority. The AML contains basic provisions and sets out general requirements which we apply across all our operational sites. The regulation that clarifies the employer's responsibility for work environment management and how it should be fulfilled is AFS 2023:1 on systematic work environment management, SAM.

The health and safety manual serves as the foundation of our occupational health and safety management. The health and safety management system of EcoDataCenter applies to all employees and all workers who are not employees who work on-site with groundwork, construction, piping, electricity, and other tasks related to new building activities. The manual contains instructions, guidelines, procedures, forms, permits, and checklists. Since the work performed during construction of our new data centers is carried out by external contractors, such workers are not as highly controlled by our OHS practices as our own employees.

Occupational health and safety for contractors is managed through contractor requirements, project-specific health and safety plans, permitting procedures, and role allocations defined under Swedish construction site legislation, including BAS-P (planning phase) and BAS-U (execution phase).

The OHS management system is not certified as of the reporting period. However, EcoDataCenter is preparing for certification of its OHS management system according to ISO 45001. Certification of all operational sites is planned for the first half of 2026.

Roles and responsibilities

Managers with direct reports have delegated responsibility for occupational health and safety within their areas of responsibility, including ensuring that the work environment is appropriate to the nature of the work. The physical, organizational, and social work environment is regularly examined and risk assessed, and reassessed when changes occur, such as the onboarding or departure of employees, to identify and implement necessary measures to maintain a safe and secure workplace.

Key activities in EcoDataCenter's occupational health and safety work

1	**Incident and accident reporting and investigation** All incidents and accidents are reported and investigated to identify root causes and implement corrective actions to prevent recurrence.
2	**Regular safety rounds and workplace inspections** Safety rounds are conducted at least quarterly at operational sites and weekly at construction sites to identify hazards and assess risks.
3	**Risk assessment of work environment changes** Occupational health and safety risks are assessed when organizational, operational, or personnel changes occur.
4	**Legal compliance** Compliance with applicable occupational health and safety legislation and other requirements is monitored.
5	**Monitoring and review of the OHS management system** Systematic work environment management is monitored and reviewed annually to ensure its continued effectiveness.

Preventive Work (GRI403-6, GRI403-4)

Health and safety committee

Once a year, HR, together with management and safety representatives where applicable, reviews sickness absence from the previous year to assess whether absences may be work-related. The outcomes of these reviews may trigger further investigation of the work environment and preventive measures to support worker health. OHS are also part of employee training, and during 2025, 73 trainings related to OHS were reported.

EcoDataCenter has a health and safety committee formed in 2023 consisting of 6 people from management and an employee representative. The committee meets every quarter and is responsible for managing and reviewing the health and safety manual, training materials, risk assessments, safety rounds, and communication related to occupational health and safety. The committee serves as the decision-making body for changes to existing health and safety practices. Employees are encouraged to report hazards, incidents, and near misses and have the right to remove themselves from hazardous situations without reprisal. 100% of employees are covered by formal OHS representation through the health and safety committee and local safety representatives

Hazard identification, risk assessment, and incident investigation (403-2)

EcoDataCenter conducts regular health and safety rounds to identify risks and hazards at operational sites that could potentially result in accidents or injuries. Safety rounds are conducted at least quarterly at operational sites and weekly at construction sites. Risks and hazards may also be identified following accidents or near misses or through direct reporting by employees.

During 2025, risks identified included mainly risks related to potential traffic incidents on our sites, potential risks of falling, tripping and slipping, and risks of fire. Most hazards were reported directly by employees in the risk management system.

The results of safety rounds, risk assessments, and incident investigations form the basis for defining corrective actions, eliminating or minimizing risks, and continuously improving workplace health and safety.

2025 hazards identified among own employees

Type of hazard	Number of hazards identified	Identification method	Management action
Hazards with risk of high-consequence injury	10	Reported by employees in Risk Management system	Continuous information spreading of reported hazards in daily operational meetings with department responsibles. Actions are distributed based on the nature of hazards reported. Actions required can be updates, such as a rebuilding activity, updating educational procedures, etc.
Hazards with risk of ill-health but not high consequence injury	15		
Hazards with no risk of ill-health	5		
Annual identified hazards	**30**		

2025 hazards identified among non-employees

Number of hazards identified	Main type of hazards	Identification method	Management action
205	Falling from heights, Tripping and slipping, Risks of fire, Risk of getting stuck or pinched	Identified through safety rounds and reported by workers.	The type of hazards not categorized by contractors

Risk assessments are conducted before the start of new work to identify, assess, and address occupational health and safety risks. This requirement applies to both employees and contractors and completed risk assessments are communicated to responsible persons at each site.

Occupational Health and Safety Training (GRI 403-5)

Health and safety training

Occupational health and safety training is provided based on the risk profiles of employees, recognizing that certain roles involve higher occupational health and safety risks than others. Training covers topics including personal protective equipment, fire safety, emergency response, accidents and injuries, and first aid.

CPR training is conducted regularly for existing employees and for new employees when relevant. Fire alarm and evacuation training exercises are performed regularly in accordance with Swedish legislation. Training materials and participation records are managed by the operations department.

EcoDataCenter provides access to occupational health services to support the prevention and management of work-related health risks. For employees, occupational health services include access to qualified medical and work environment expertise, preventive support related to work-related health risks, and emergency preparedness measures such as first aid and CPR.

Contractors are responsible for providing occupational health services for their employees in accordance with applicable legislation. EcoDataCenter ensures that contractors working on its sites comply with site-specific health and safety requirements and emergency procedures.

Work-related injuries (GRI 403-9)

EcoDataCenter records and reports on work-related injuries in accordance with GRI definitions. Data is collected for employees and for workers who are not employees, including contractors, and is based on hours worked. Recordable injuries include all work related injuries or illnesses that result in lost work time, restricted duties, medical treatment beyond first aid, occupational disease, or fatality. These cases are included in the injury rate calculation. Incidents that do not result in injury are classified as near misses. The calculation methodology was updated during the reporting period, which affects comparability with previous years.

Employee incidents	Nr of incident	Injury rate*	Description of incidents
Type of incident	**2025**	**2025**	**2025**
Fatalities	0	0	N/A
High - consequence injuries	0	0	N/A
Recordable injuries	0	0	N/A
Near misses	9	0	Near misses included smaller incidents such as bruises and hits with no medical treatment needed. It also includes electrical and fire-related potential incidents, equipment malfunctions, installation or securing issues, and work carried out in confined or active operational areas.

*Injury rate calculated as events per million worked hours, total hours worked was 159 264 in 2025.

Non-employee incidents	Nr of incident	Injury rate*	Description of incidents
Type of incident	**2025**	**2025**	**2025**
Fatalities	0	0	N/A
High - consequence injuries	0	0	N/A
Recordable injuries	4	13 , 88	• Back injury sustained while lifting a door, resulting in sick leave. • Finger crush injury sustained, requiring medical treatment (stitches). • Hand cut sustained during electrical cabling work. • Slip on a slippery surface and struck head against a metal edge, resulting in a minor wound.
Near misses	46		Most near misses consisted of tripping and slipping , contact with sharp objects , getting hit by a lose item/object .

*Injury rate calculated as events per million worked hours, total hours worked was 288 164 in 2025

Healthy employees

In the collective bargaining agreement, there is insurance that if our employees fall ill, they will still get 80% of their pay. On top of this, all our employees are offered private health insurance. We are investigating the need for health checkups for our employees. For the time being corporate healthcare services are provided when necessary. As part of the annual appraisal between employee and manager, there is an opportunity to discuss both physical and mental health and work-life balance. If there is a need for further dialogue on employee health, the occupational health service is available to employees through their manager or HR.

EcoDataCenter also promotes health and safety among employees by offering an annual health benefit of 3,000 SEK. Ample vacation days are provided to all employees, in line with relevant collective bargaining agreements. Parental leave is also granted to all employees in line with relevant collective bargaining agreements and Swedish law. Employees are also offered working from home possibilities, allowing for more flexibility. Occupational health care is offered to employees when necessary. EcoDataCenter also provides additional health insurance to all employees.

Ill health of employees (GRI 403-10)

Work-related ill health of employees during 2025 was very minimal, amounting to 1% of all worked hours (1555 hours of ill health leave compared to a total of 159 264 hours worked in 2025).

It is not relevant according to Swedish law whether ill health derives from work or outside work. The employer still has a responsibility to offer rehabilitation. Therefore, we do not have a distinction of work-related or non-work-related ill health hours, and several of the ill health leave reported in 2025 are supposedly related to reasons outside of the workplace. In 2025, we had no long-term sick leave; all reported hours relate to shorter periods of illness. There were no cases of fatalities because of work-related ill health. In general, data centers are not as high-risk for work-related illnesses compared to many other industries such as chemicals, manufacturing, mining, or construction. The main hazards for work-related ill health are loud work environments in server rooms and chemical handling of coolants in pump rooms. Additional hazards, related to an under-dimensioned eye washing station and inadequate signage in a high-risk area, have also been identified by regular health and safety procedures performed at the operational sites. The loud work environment hazard was addressed via implementing requirements for using ear protection (PPE).

Work-related stress is identified as a work-related ill health hazard, mainly from being mentioned as a risk factor in employee surveys. The risk is monitored closely; however, there is no correlation between actual ill health leave and these risks identified during 2025. Ill health hazards identified in the safety rounds have not resulted in any ill health leave during 2025.

Working hours (total)	**Men**	**Women**
Total number of employees worked hours (total employees, part time-full time included)	129 024	30 240

Sickness absence rate %	**Men**	**Women**
Percentage	1,10%	0,45%
Number of hours lost	1419	136

EcoDataCenter

About this report

This Sustainability report is issued by EcoDataCenter Holding AB (publ). This is our third external sustainability report. There are no restatements of information in this report. We release a sustainability report on an annual basis. The sustainability information in this report has been reviewed (limited assurance) by external To the best of our knowledge zero incidents of anti corruption, bribery, anti-competitive behaviour or otherwise... has occured during the reporting period 2022-2025.s. Sustainability reports for previous years are available at www.ecodatacenter.tech. Senior executives have been involved in the decision to have this external assurance, as well as the process of screening various assurance providers. The reporting period and scope are the same as for our financial reporting, and both our sustainability information and financial information are presented in this report. The reporting period is from January 1, 2025, to December 31, 2025. EcoDataCenter's sustainability report is prepared in accordance with the Global Reporting Initiative (GRI) Standards and the Greenhouse Gas Protocol standards for emission accounting. EcoDataCenter's sustainability report has also been prepared in accordance with the requirements of Swedish Annual Accounts act (that applied before July 1, 2024) on a voluntary basis. This report was published on May X, 2026 on a voluntary basis after review and approval from the Board of directors of EcoDataCenter. The previous Sustainability report was released on May 5, 2025.

For questions about this sustainability report, contact John Wernvik, Chief Marketing & Communications Officer john.wernvik@ecodatacenter.se.

Entities in reporting

This report is issued by EcoDC Holding AB (publ), 559491-2098. Entities included in this report are our site in Falun and its operations (EcoDC Falun AB, 559083-6366), our acquired site in Borlänge (EcoDC Borlänge AB 559281-4767), EcoDC Östersund AB (559377-6221), our parent company (EcoDC AB, 556969-1065) and our holding companies (EcoDC Group AB, 559489-6978, EcoDC Holding AB (publ) 559491-2098, EcoDC 2 AB, 559494-6401). Our two sites in Stockholm (formerly EcoDC Stockholm AB, 559261-3177), and our site in Piteå (formerly EcoDC Piteå AB, 556668-1044) was divested and no longer part of the company structure as of 2026-06-30. This is the same scope as for our financial reporting.

During the year, disposal of entities in Stockholm and Piteå was made. Also, our newest data center in Falun, Data Center 1D, became operational in 2025. The material topics are applied for the organization, but environmental aspects are assessed locally for each data center, closer to the operations as part of environmental management according to ISO 14001. The material topics related to construction mainly applies to the Falun and Borlänge site.

Controls of reported data

Health and safety data, as well as environmental data such as energy, water, and waste, are reported by each data center and our main contractor. The environmental data used in this report was collected directly from each site. One responsible person and one backup were appointed at each site to report environmental and safety data. They were trained on the reporting platform and supported by the sustainability team when needed.

Energy, fuel, and water consumption are monitored monthly. Customers are billed based on the electricity used by their servers, and dedicated meters are installed for all customers. Waste data is provided by waste operators and logged →→ into our system. Safety data is reported in a separate system, after which incidents and hazards are transferred to the sustainability reporting system.

Company-wide data is collected by the responsible functions. HR data is compiled by HR using templates provided by the sustainability team. Qualitative information is gathered across functions and reviewed by the management team, including the sustainability function. As a general principle, reported data is reviewed by at least two additional persons. Data is also compared year on year to ensure consistency and correct units of measurement. Emission factors are applied within the sustainability reporting system.

We aim to further integrate our IT systems with the sustainability reporting tool to reduce reporting risks, improve efficiency, and allow more time to focus on performance improvements.

ANNEX GHG
emission methodology

Scope and approach

EcoDataCenter reports transparently and consistently on Scope 1, 2, and 3 GHG emissions. Our base year is 2022, as this was the first year with reliable sustainability data. In 2023, we completed our first full Scope 3 inventory, resulting in comprehensive Scope 1, 2, and 3 reporting. Our GHG accounting follows the Greenhouse Gas Protocol and is continuously refined as our methodology matures.

The inventory covers EcoDC Holding AB (publ) and all data centers under financial or operational control, including offices, data centers, and construction works in Falun and Borlänge, the two facilities in Stockholm, and the two in Piteå. We account for emissions and removals from facilities where we have financial or operational control. While customers' hardware choices influence energy use, we have full financial control over our data centers and can determine electricity sourcing and fuel types. For this reason, we apply the financial control approach. Consequently, customer energy-related emissions are accounted for as Scope 1 and 2 rather than Scope 3, as they are largely within our control.

Our full Scope 1, 2, and 3 inventory is updated annually and publicly disclosed through CDP and our sustainability report.

Biogenic emissions, emission factors, and greenhouse gases included

According to DEFRA methodology, biogenic CO_2 emissions are reported outside the scopes under the GHG Protocol Corporate Accounting and Reporting Standard, as the Scope 1 impact is considered net zero due to carbon absorption during biomass growth.

All greenhouse gases under the Kyoto Protocol, including CH_4, N_2O, HFCs, PFCs, SF_6, and NF_3, are converted into CO_2 equivalents. Refrigerant emission factors are based on accredited service data reported to local municipalities. Fuel emission factors for Diesel, HVO100, and EcoPar A are sourced from suppliers. Scope 3 emission factors are primarily sourced from DEFRA, Boverket, Environmental Product Declarations, guarantees of origin, and supplier climate data.

Data collection and quality

Since 2023, operational GHG data is managed through reporting software; prior to this, data was reported manually. Emissions data is collected from each data center and is considered to have sufficient quality and accuracy for the 2022–2025 inventories. Methodologies are applied consistently and transparently throughout data collection, review, and calculation processes. LCAs and PCFs used for Scope 3 Categories 1 and 2 are prepared by external consultants and reviewed internally.

A four-eye principle is applied to data collection and verification. The Sustainability Manager reviews data, emission factors, calculations, and methodologies, ensures appropriate training for data reporters, manages annual reporting, and oversees assurance requirements. Our 2025 emissions data was subject to limited assurance by EY.

Emission factors are documented within the reporting platform and primarily sourced from reputable public databases, supplemented by supplier data, EPDs, and PCFs. Key sources include the DEFRA Emission Factor Set for Advanced Users, Boverket's building climate database, and EPDs for purchased electricity and heat from suppliers such as Vattenfall and Pite Energi.

Assumptions and methodological considerations

Very few assumptions are made in Scope 1 and 2 due to the high quality of activity data, reliable emission factors, and strong ability to identify errors or abnormalities. As a result, no significant assumptions are applied for Scope 1 and 2 calculations.

In Scope 3, certain assumptions are required, primarily for categories where activity data is less precise or not fully available. This includes business travel, employee commuting, and purchased goods and services. Assumptions for commuting are based on average travel distances, commuting days, and typical transport modes. For business travel, assumptions may be made regarding travel distances, round trips, and hotel locations based on available origin and destination information.

Wastewater is omitted from Scope 3 as it has been assessed as insignificant. In addition, available emission factors are primarily based on UK conditions and are not considered representative for the Swedish context due to differences in the energy mix.

GHG emission values for capital goods are based on supplier Environmental Product Declarations (EPDs) when available. When EPDs are not available, emissions are estimated using data from comparable products and scaled as necessary. Emissions from construction materials and capital goods are allocated to the year the data center is commissioned.

Recalculations and comparability

Year-on-year comparability is important. No recalculations were made for 2025. We commit to recalculating the 2022 baseline in line with the GHG Protocol, ISO 14064-1, and SBTi guidance when required. Baseline recalculation is triggered in the event of acquisitions or divestments, significant methodological changes, updated emission factors, or identified errors exceeding 5 percent of annual emissions. Organic growth through new data center construction does not require baseline adjustment under current standards.

We reassess Scope 3 emissions annually, focusing particularly on the most material categories, including Categories 1, 2, and 3, as our assessment methodology continues to mature.

Auditor's limited assurance report on EcoDC Holding AB (publ)'s sustainability report

To EcoDC Holding AB (publ), corporate identity number 559491-2098

Conclusion

We have been appointed by the Board of Directors and the Managing Director to conduct a limited assurance engagement of the sustainability report of EcoDC Holding AB (publ) for the financial year 2025. The sustainability report is included on page 1-127 in this document.

Based on our limited assurance engagement as described in the section Auditor's responsibility, nothing has come to our attention that causes us to believe that the sustainability report is not, in all material respects, prepared in accordance with the sustainability reporting framework issued by GRI (Global Reporting Initiative), as well as the company's own accounting and calculation principles.

Basis for conclusion

We have conducted the limited assurance engagement in accordance with ISAE 3000 (Revised), *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*. Our responsibility under this standard is further described in the section Auditor's responsibility.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Responsibilities of the Board of Directors and the Managing Director

The Board of Directors and the Managing Director are responsible for the preparation of the sustainability report in accordance with the applicable criteria, as described on page 124-127 of the sustainability report. The applicable criteria consist of the relevant parts of the sustainability reporting framework issued by GRI (Global Reporting Initiative), as well as the company's own accounting and calculation principles. This responsibility also includes such internal control as the Board of Directors and the Managing Director determine is necessary to enable the preparation of a sustainability report that is free from material misstatements, whether due to fraud or error.

Auditor's responsibility

Our responsibility is to express a conclusion on the sustainability report based on our review. The limited assurance engagement has been conducted in accordance with ISAE 3000 (Revised) Assurance Engagements Other than Audits or Reviews of Historical Financial Information. This standard requires that we plan and perform our procedures to obtain limited assurance that the sustainability report is prepared in accordance with the criteria described in the section Responsibilities of the Board of Directors and the Managing Director.

The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. This means that it is not possible for us to obtain such assurance that we become aware of all significant matters that could have been identified if a reasonable assurance engagement had been performed. →→

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

We are independent of EcoDC AB (publ) in accordance with professional ethics for accountants in Sweden and have otherwise fulfilled our ethical responsibilities in accordance with these requirements.

The limited assurance engagement involves performing procedures to obtain evidence to support the sustainability report. The auditor selects the procedures to be performed, including assessing the risks of material misstatements in the sustainability report, whether due to fraud or error. In this risk assessment, the auditor considers the parts of the internal control that are relevant to how the Board of Directors and the Managing Director prepares the sustainability report, in order to design procedures that are appropriate under the circumstances, but not for the purpose of providing a conclusion on the effectiveness of the company's internal control. The review consists of making inquiries, primarily of persons responsible for the preparation of the sustainability report, performing analytical review, and conducting other review procedures.

Stockholm, 15 April, 2026
Ernst & Young AB

Katrine Söderberg
Authorized Public Accountant

Marianne Förander
Specialist-member in FAR

EcoDataCenter 2025 GRI Content Index

EcoDataCenter has reported in accordance with the GRI Standards for the period January 1, 2025, to December 31, 2025. The information in our 2025 Sustainability Report and in this GRI Content Index have been prepared in accordance with the international GRI Standards for sustainability reporting of economic, environmental, and social impacts. The GRI Universal Standards were used and no GRI Sector Standards were used for the 2025 reporting.

Updates to disclosed GRI indicators

2025 was the third year that EcoDataCenter published its Annual Sustainability Report in accordance with the GRI Standards. Based on recommendations as part of the external limited assurance of this Sustainability Report, a reassessment has been made to the selected GRI indicators disclosed, based on the business activities and locations of EcoDataCenter.

It should be noted that no data points presented in the Annual Sustainability Report have been excluded between the reporting year 2024 and 2025, with a single change in wording of KPI from avoided emissions to emissions related to heat reuse after feedback from the auditors.

GRI Standard	Disclosures	Related material topic	Location in 2025 annual report	Page number	Comments
General Disclosures					
GRI 2: General Disclosures 2021	2-1 Organizational details	Mandatory	Our company	12	
	2-2 Entities included in the organization's sustainability reporting	Mandatory	About this report	124	
	2-3 Reporting period, frequency and contact point	Mandatory	About this report	124	
	2-4 Restatements of information	Mandatory	About this report	124	
	2-5 External assurance	Mandatory	About this report	124	
	2-6 Activities, value chain and other business relationships	Mandatory	Our company	12	
	2-7 Employees	Mandatory	Our employees	100	
	2-8 Workers who are not employees	Mandatory	Our employees	101	
	2-9 Governance structure and composition	Mandatory	Governance	16	
	2-10 Nomination and selection of the highest governance body	Mandatory	Governance - Election of the board	20	
	2-11 Chair of the highest governance body	Mandatory	Governance - The composition of the board	18	
	2-12 Role of the highest governance body in overseeing the management of impacts	Mandatory	Governance - The board of directors	17	
	2-13 Delegation of responsibility for managing impacts	Mandatory	Governance - The board of directors	17	
	2-14 Role of the highest governance body in sustainability reporting	Mandatory	Governance - The board of directors	17	
	2-15 Conflicts of interest	Mandatory	Governance - Conflicts of interest	17	
	2-16 Communication of critical concerns	Mandatory	Governance - Critical concerns and Whitsleblowing	45	
	2-17 Collective knowledge of the highest governance body	Mandatory	Governance - The composition of the board	17	

GRI Standard	Disclosures	Related material topic	Location in 2025 annual report	Page number	Comments
	2-18 Evaluation of the performance of the highest governance body	Mandatory	Governance - Evaluation of the board	20	
	2-19 Remuneration policies	Mandatory	Remuneration of the board; Salary and remuneration	20, 108	
	2-20 Process to determine remuneration	Mandatory	Remuneration of the board; Salary and remuneration	20	
	2-21 Annual total compensation ratio	Mandatory	Ratio of annual compensation	108	
	2-22 Statement on sustainable development strategy	Mandatory	Governance - Responsible business	32	
	2-23 Policy commitments	Mandatory	Governance - Responsible business	32	
	2-24 Embedding policy commitments	Mandatory	Governance - Responsible business	32	
	2-25 Processes to remediate negative impacts	Mandatory	Governance - Remediation and grievance mechanisms	38	
	2-26 Mechanisms for seeking advice and raising concerns	Mandatory	Governance - Critical concerns and Whitsleblowing	45	
	2-27 Compliance with laws and regulations	Mandatory	Governance - Legal compliance	33	
	2-28 Membership associations	Mandatory	Governance - Memberships and commitments	49	
	2-29 Approach to stakeholder engagement	Mandatory	Governance - Stakeholder engagement	47	
	2-30 Collective bargaining agreements	Mandatory	Working conditions, unions, and collective bargaining	107	
Material Topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Mandatory	Our material topics	22	
	3-2 List of material topics	Mandatory	Our material topics	24	
Indirect economic impacts					
GRI 3: Material Topics 2021	3-3 Management of material topics	Local communities & stakeholders	Impact and infrastructure investments for local communities	38	
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Local communities & stakeholders	Impact and infrastructure investments for local communities	38	
	203-2 Significant indirect economic impacts	Local communities & stakeholders	Local commitment	38	
Procurement Practices					
GRI 3: Material Topics 2021	3-3 Management of material topics	Environmental and social impact, risks, and opportunities in the supply chain	Supply chain sustainability	42	
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Environmental and social impact, risks, and opportunities in the supply chain	Supply chain sustainability	42	

GRI Standard	Disclosures	Related material topic	Location in 2025 annual report	Page number	Comments
Anti-corruption					
GRI 3: Material Topics 2021	3-3 Management of material topics	Business Ethics and compliance	Bribes and anti-corruption	36	
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Business Ethics and compliance	Bribes and anti-corruption	36	
	205-2 Communication and training about anti-corruption policies and procedures	Business Ethics and compliance	Bribes and anti-corruption	36	
	205-3 Confirmed incidents of corruption and actions taken	Business Ethics and compliance	Bribes and anti-corruption	36	
Anti-competitive Behavior					
GRI 3: Material Topics 2021	3-3 Management of material topics	Business Ethics and compliance	Bribes and anti-corruption	36	
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Business Ethics and compliance	Bribes and anti-corruption	36	
Energy					
GRI 3: Material Topics 2021	3-3 Management of material topics	Energy use and energy efficiency	Our energy use	52	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Energy use and energy efficiency	Our energy use	52	
	302-2 Energy consumption outside of the organization	Energy use and energy efficiency	Our energy use	52	
	302-3 Energy intensity	Energy use and energy efficiency	Our PUE	56	
Water and Effluents					
GRI 3: Material Topics 2021	3-3 Management of material topics	Water use	Our relation to water	80	
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Water use	Our relation to water	80	
	303-2 Management of water discharge-related impacts	Water use	Our relation to water	80	
	303-3 Water withdrawal	Water use	Our relation to water	81	
	303-4 Water discharge	Water use	Our relation to water	81	
	303-5 Water consumption	Water use	Our relation to water	81	
Biodiversity					
GRI 3: Material Topics 2021	3-3 Management of material topics	Biodiversity	Biodiversity	90	
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Biodiversity	Our impact on Biodiversity	91	
	304-2 Significant impacts of activities, products and services on biodiversity	Biodiversity	Biodiversity	91	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	Biodiversity	Our impact on Biodiversity	91	

GRI Standard	Disclosures	Related material topic	Location in 2025 annual report	Page number	Comments
Emissions					
GRI 3: Material Topics 2021	3-3 Management of material topics	Climate change	Our GHG emissions	64	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Climate change	Scope 1 & 2 emissions	65	
	305-2 Energy indirect (Scope 2) GHG emissions	Climate change	Scope 1 & 2 emissions	65	
	305-3 Other indirect (Scope 3) GHG emissions	Climate change	Scope 3 emissions	65	
	305-4 GHG emissions intensity	Climate change	Carbon Usage Effectiveness (CUE)	67	
	305-5 Reduction of GHG emissions	Climate change	Total GHG emissions per scope	65	
Waste					
GRI 3: Material Topics 2021	3-3 Management of material topics	Waste	Circularity	84	
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Waste	Our waste	87	
	306-2 Management of significant waste-related impacts	Waste	Our waste	88	
	306-3 Waste generated	Waste	Our waste	87	
	306-4 Waste diverted from disposal	Waste	Our waste	88	
	306-5 Waste directed to disposal	Waste	Our waste	88	
Supplier Environmental Assessment					
GRI 3: Material Topics 2021	3-3 Management of material topics	Environmental and social impact, risks, and opportunities in the supply chain	Supply chain sustainability	40-43	
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Environmental and social impact, risks, and opportunities in the supply chain	Supply chain sustainability	40-43	
	308-2 Negative environmental impacts in the supply chain and actions taken	Environmental and social impact, risks, and opportunities in the supply chain	Supply chain sustainability	40-43	
Employment					
GRI 3: Material Topics 2021	3-3 Management of material topics	Attraction and retention of talent	Our employees	100	
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Attraction and retention of talent	Our employees	100	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Attraction and retention of talent	Our employees	106	
	401-3 Parental leave	Attraction and retention of talent	Our employees	106	
Labor/Management Relations					
GRI 3: Material Topics 2021	3-3 Management of material topics	Attraction and retention of talent	Working conditions, unions, and collective bargaining	107	
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	Attraction and retention of talent	Working conditions, unions, and collective bargaining	107	

GRI Standard	Disclosures	Related material topic	Location in 2025 annual report	Page number	Comments
Occupational Health and Safety					
GRI 3: Material Topics 2021	3-3 Management of material topics	Health and safety	Occupational health and safety	116	
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Health and safety	Occupational health and safety	116	
	403-2 Hazard identification, risk assessment, and incident investigation	Health and safety	Incidents	118	
	403-3 Occupational health services	Health and safety	Healthy employees	122	
	403-4 Worker participation, consultation, and communication on occupational health and safety	Health and safety	Occupational health and safety	118	
	403-5 Worker training on occupational health and safety	Health and safety	Occupational health and safety	120	
	403-6 Promotion of worker health	Health and safety	Healthy employees	122	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Health and safety	Healthy employees	122	
	403-8 Workers covered by an occupational health and safety management system	Health and safety	Healthy employees	122	
	403-9 Work-related injuries	Health and safety	Incidents	118	
Training and Education					
GRI 3: Material Topics 2021	3-3 Management of material topics	Attraction and retention of talent	Employee development and training	110	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Attraction and retention of talent	Employee development and training	111	
	404-2 Programs for upgrading employee skills and transition assistance programs	Attraction and retention of talent	Employee development and training	109	
	404-3 Percentage of employees receiving regular performance and career development reviews	Attraction and retention of talent	Employee development and training	109	
Diversity and Equal Opportunity					
GRI 3: Material Topics 2021	3-3 Management of material topics	Diversity and inclusion	Diversity disclosures	102	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Diversity and inclusion	Diversity disclosures	103	
	405-2 Ratio of basic salary and remuneration of women to men	Diversity and inclusion	Salary and remuneration	108	
Non-discrimination					
GRI 3: Material Topics 2021	3-3 Management of material topics	Diversity and inclusion	Inclusion and anti-discrimination	102	
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Diversity and inclusion	Inclusion and anti-discrimination	102	

GRI Standard	Disclosures	Related material topic	Location in 2025 annual report	Page number	Comments
Freedom of Association and Collective Bargaining					
GRI 3: Material Topics 2021	3-3 Management of material topics	Attraction and retention of talent	Our material topics + Supply chain sustainability / Impact and infrastructure investments for local communities + Local commitment	24 , 40, 106	EcoDataCenter identifies very low risk in its own operations. This disclosure is material, but only relevant to suppliers in the supply chain.
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Attraction and retention of talent	Remediations and grievance mechanis; Employees – working conditions, unions and and collective bargaining; Supply chain sustainability	38. 42, 46	EcoDataCenter identifies very low risk in its own operations. This disclosure is material, but only relevant to suppliers in the supply chain.
Local communities					
GRI 3: Material Topics 2021	3-3 Management of material topics	Local communities	Our material topics + Supply chain sustainability / Impact and infrastructure investments for local communities + Local commitment	40	
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Local communities	Supply chain sustainability / Impact and infrastructure investments for local communities + Local commitment	40	
	413-2 Operations with significant actual and potential negative impacts on local communities	Local communities	Supply chain sustainability / Impact and infrastructure investments for local communities + Local commitment	40	
Supplier social assessment					
GRI 3: Material Topics 2021	3-3 Management of material topics	Environmental and social impact, risks, and opportunities in the supply chain	Supply chain sustainability	40, 44	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Environmental and social impact, risks, and opportunities in the supply chain	Supply chain sustainability	40	
	414-2 Negative social impacts in the supply chain and actions taken	Environmental and social impact, risks, and opportunities in the supply chain	Supply chain sustainability	40. 44	
Customer privacy					
GRI 3: Material Topics 2021	3-3 Management of material topics	Business Ethics and compliance	Security & Information security	48	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Business Ethics and compliance	Security & Information security	48	

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