

CSR REPORT

2024/2025

www.luxconnect.lu

LUX
CONNECT



Enabling data security

LUX
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1. INTRODUCTION



In 2024, LuxConnect and its subsidiary LuxProvide took a meaningful step forward in their sustainability journey by undergoing a joint audit for the Corporate Social Responsibility (CSR) label. This initiative reflected our shared commitment to acting responsibly across economic, social, and environmental dimensions, in alignment with the mission entrusted to us by the Luxembourg State. As key enablers of the country's digital infrastructure and innovation ecosystem, we saw it as our duty to demonstrate leadership in CSR and set the foundations for a responsible growth model.

Following this initial step, we engaged external support to further professionalize our approach. We undertook a comprehensive review of our strategy, which included in-depth consultations with our stakeholders. These efforts allowed us to better understand their expectations, reassess our priorities, and design a structured and impactful action plan for the years ahead.

Throughout this process, it became increasingly clear that while LuxConnect and LuxProvide share common values and goals, the specificities of their business models and stakeholder landscapes call for distinct approaches. The Environmental, Social, and Governance (ESG) risks we face, the material topics relevant to our stakeholders, and the strategic levers available to us vary significantly. Attempting to represent both organizations under a single strategy would inevitably require compromising on clarity and relevance and potentially lead to diluted messaging. We believe that each entity deserves the space to articulate its own CSR narrative, based on its operations, stakeholder priorities, and sector-specific challenges.

For this reason, we have jointly decided that starting in 2025, LuxConnect and LuxProvide will adopt separate CSR strategies and publish individual sustainability reports. This evolution will allow each organization to communicate more clearly and transparently with its own ecosystem. It will also improve the traceability of performance indicators and streamline the audit process by reducing the complexity of cross-entity consolidations.

By following this path, we reaffirm our commitment to the principle of “best possible information” as promoted by the Corporate Sustainability Reporting Directive (CSRD), and to continuous improvement in our sustainability performance. While our CSR strategies will now be distinct, our shared ambition remains unchanged: to act as responsible corporate citizens, to support Luxembourg’s sustainable digital transition, and to contribute positively to the well-being of society.



Paul Konsbruck
CEO
LuxConnect



Arnaud Lambert
CEO
LuxProvide

2. GENERAL INFORMATION

Bettembourg site

202, Z.A.E. Wolser F
L-3290 Bettembourg



Bissen site

3, op der Poukewiss
Z.A.C. Klengbousbiérg
L-7795 Bissen

LuxConnect, a private limited liability undertaking company fully owned by the Luxembourg State, is dedicated to strengthening the national economy through a unique offering in infrastructure and services. With four state-of-the-art Data Centers across two sites and a 1.900 km nationwide fiber optic network, we create high-performance, sustainable environments that support the growth of our clients.

Our portfolio has recently expanded with LuxProvide and Clarence. LuxProvide, home to the MeluXina HPC, and soon MeluXina AI and quantum, is driving innovation in data analytics and AI. Clarence, our sovereign cloud solution developed in partnership with Proximus, ensures scalable and secure cloud capabilities tailored to future needs.

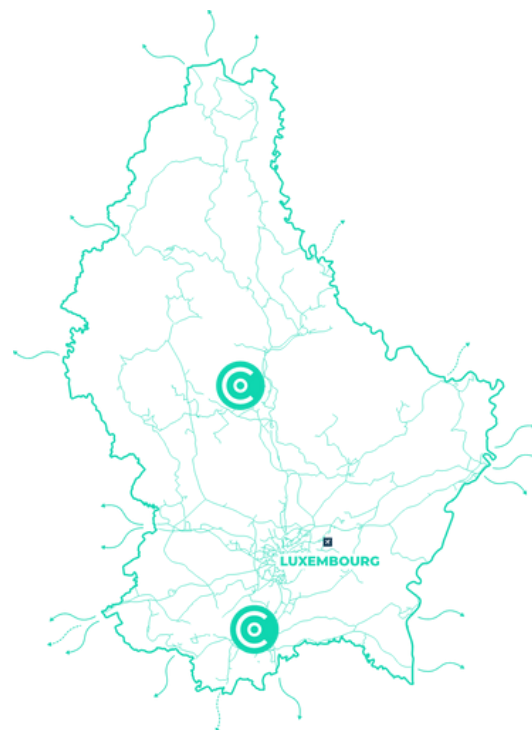
To support this ongoing growth, we are preparing the construction of a new administrative building by end of 2027, designed to centralize all our entities under one roof. This modern facility will be complemented by an elevated parking structure, further enhancing accessibility and operational efficiency.

2.1. PRODUCTS & SERVICES

LuxConnect has two business lines: Data Center and Dark Fiber Provider in Luxembourg.

With four Tier IV Data Centers (three in Bettembourg, one in Bissen), LuxConnect is offering Data Center colocation services directly to end customers.

LuxConnect's optical fiber backbone encompasses around 1.900 km of fiber throughout Luxembourg. The backbone connects all commercial Data Centers in Luxembourg redundantly and gives telecom operators a choice of twelve country outbreaks to interconnect to and from Luxembourg.



2.2. OUR SUBSIDIARIES



LuxProvide, founded in 2019 and 100% owned by LuxConnect, fuses data science expertise with supercomputing capabilities. Centered around MeluXina supercomputer, it stands ready to harness the power of data analytics.



Clarence's disconnected sovereign cloud solution is the result of a joint venture between LuxConnect (60%) and Proximus (40%). Its mission is to offer unparalleled security and scalability to meet the specific needs of businesses for access to compliant data storage.



DCE, a subsidiary jointly owned by LuxConnect and LuxEnergie, was founded in 2008. It finances, builds, and operates energy systems for our four Data Centers.

LuxConnect also acts as a facilitator and incubator in the ICT industry and has been instrumental in the creation of LU-CIX, the Luxembourg Commercial Internet Exchange.

2.3. KEY FIGURES 2024



Including 8,7 M€ net result



Average length of service of employees



End of 2024



Other HR Metrics

0 employee covered by a collective bargaining agreement

1 work-related accident

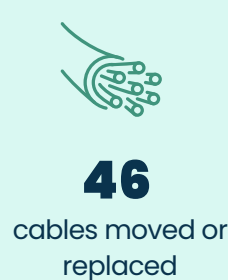
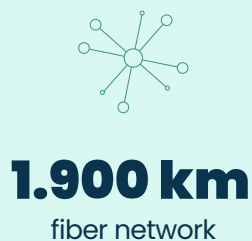
6 nationalities

Data Centers KPI's



The KPIs for our Data Centers remain unchanged, as we re-evaluate them once every two years when we assess our carbon footprint. The reference year is 2023 - our next carbon footprint assessment is planned for 2026.

Dark Fiber KPI's



¹ Power Usage Effectiveness

² Carbon Usage Effectiveness

³ Water Usage Effectiveness

2.4. CARBON FOOTPRINT

Our commitments

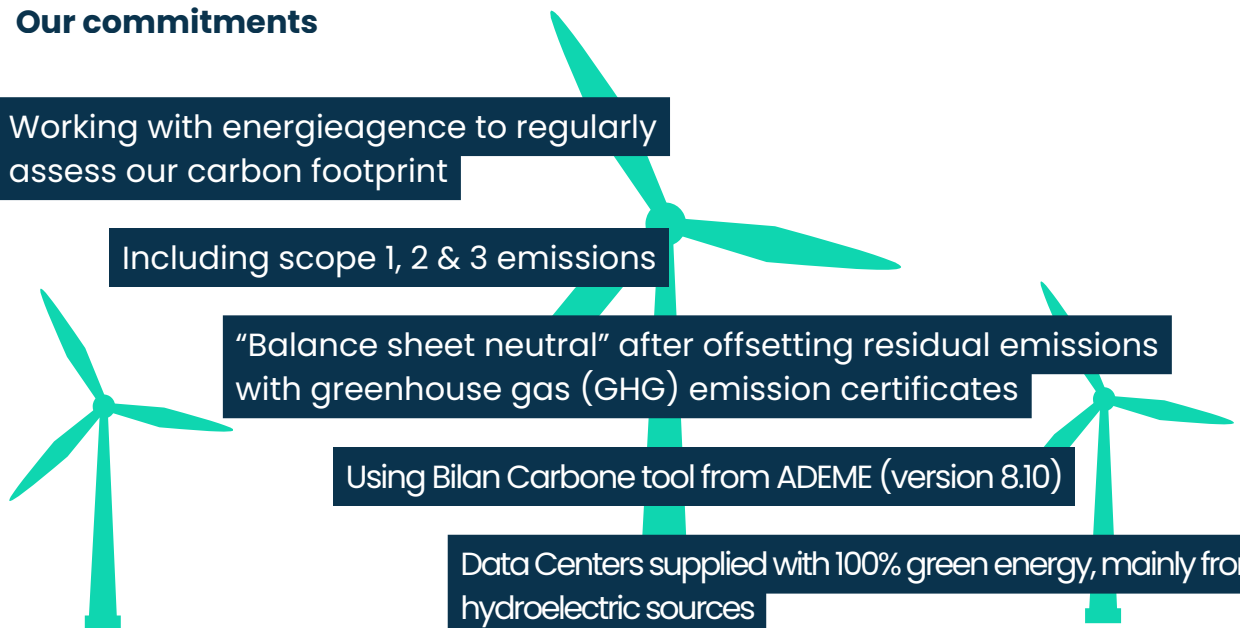
Working with energieageance to regularly assess our carbon footprint

Including scope 1, 2 & 3 emissions

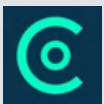
“Balance sheet neutral” after offsetting residual emissions with greenhouse gas (GHG) emission certificates

Using Bilan Carbone tool from ADEME (version 8.10)

Data Centers supplied with 100% green energy, mainly from hydroelectric sources



Perimeter



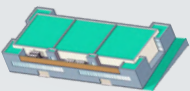
Headquarter



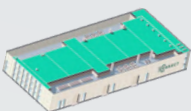
DC1.1



DC1.2



DC1.3

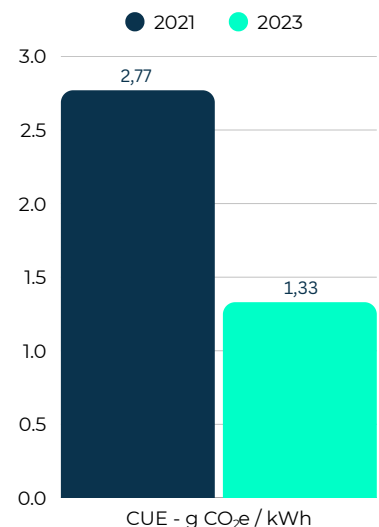
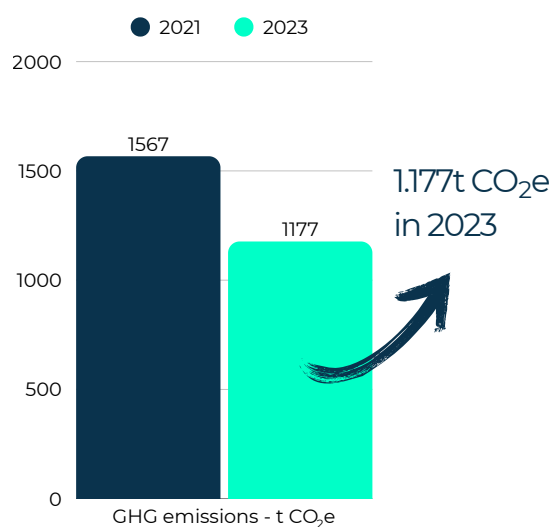


DC2



Dark Fiber Entity

For the year 2023



* -390 t CO₂e in 2 years (-25%) despite a 11% increase of electricity consumption

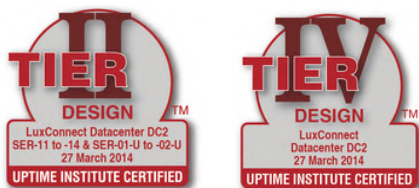
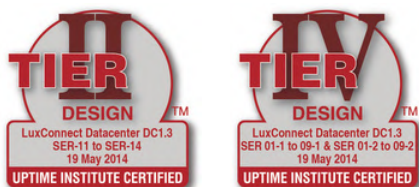
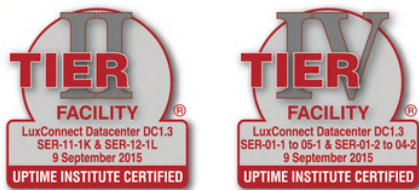
* FE Ecomix hydro : 0 kg CO₂e/kWh

Actions taken to decrease our carbon footprint

- ▶ No emissions related to refrigerant
- ▶ Reducing quantity of waste (reduction of 113 t CO₂e compared to 2021)

2.5. LABELS & CERTIFICATIONS

LuxConnect has proudly earned a range of certifications, reflecting its commitment to excellence in various aspects of their operations. These include certifications that underscore the quality, performance and security of our infrastructure and processes, as well as our dedication to societal and environmental responsibility. Below, you'll find the logos representing each of these achievements, showcasing the high standards the company upholds across all areas of its business.



3. LUXCONNECT, A SOCIALLY RESPONSIBLE COMPANY

3.1. HISTORY

In 2016, LuxConnect made a strategic decision to integrate Corporate Social Responsibility (CSR) into its core operations. This marked the beginning of a dedicated CSR-focused efforts and to the creation and development of a specialized CSR team.

From April to September 2016, Christine De Ridder – first member of the Team – completed the entire training cycle recommended by INDR and carried out the first two certification audits in 2017 and 2021.



Building on the foundation laid in 2016, LuxConnect began addressing CSR themes more systematically from 2017 onwards. The company's commitment to CSR was further strengthened with the arrival of Magali Panozzo, in 2022. Magali, like Christine, completed the entire CSR training cycle and passed her certification exam in January 2023.

In January 2024, the CSR team welcomed Martina Cappuccio, to promote internally and externally the company's CSR commitments. She also completed the CSR training the same year.

The next initial audit was planned in October 2023. Considering the addition of LuxProvide to our CSR scope, in April 2024, with a delay of 6 months, LuxConnect and LuxProvide were awarded the CSR label from INDR following a thorough certification audit. Under professional guidance from Distinct Consulting and considering their own specificities, we decided that LuxConnect and LuxProvide would follow different CSR strategies to maximize their impact. The next audit, individual to each company, will take place in October 2026.

Certifications



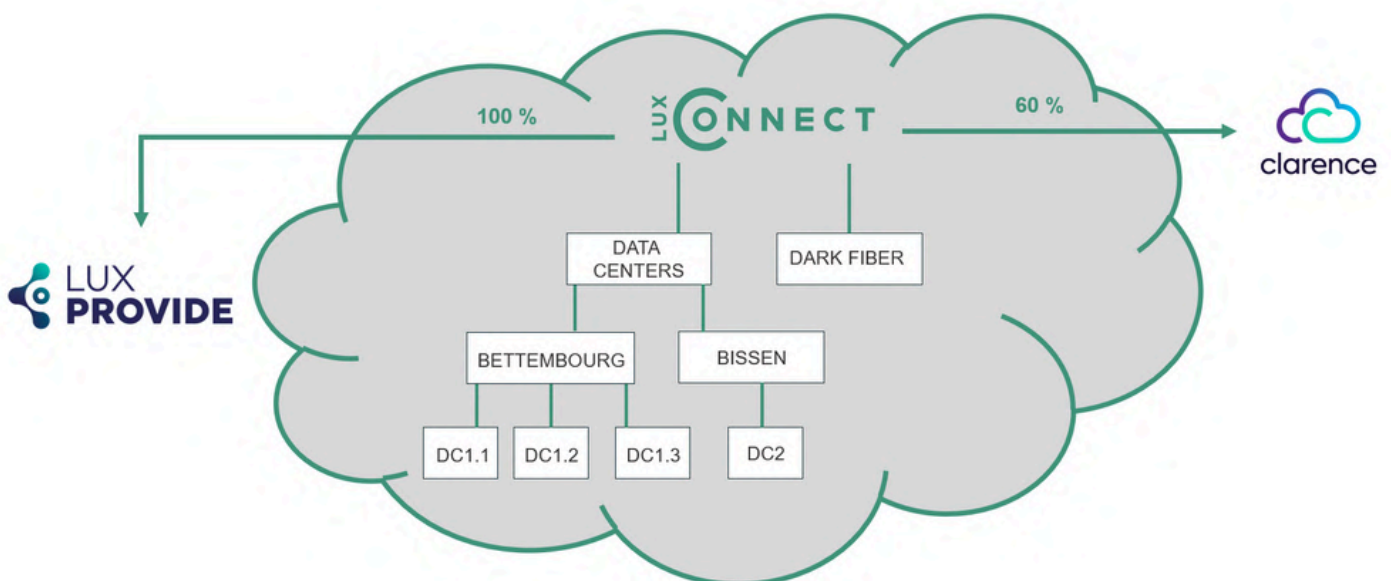
3.2. CSR SCOPE

Since our last audit, and considering the comments made by the auditor, we've been focused on analyzing our stakeholders, materiality matrix and our value chain.

It rapidly turned out that LuxProvide, although a 100% subsidiary of LuxConnect, operates like one of our customers, with a distinct business model and a different materiality, which made the exercise even more complex.

To address this, we believe defining two separate perimeters reduces complexity: fewer cross-references, fewer consolidation assumptions, and greater traceability of indicators. This approach will also facilitate the next audit. Separate reports, supported by entity-specific documentation, ensure that each model is accurately reflected and avoid potential confusion.

Each organization will be able to communicate a clear CSR story to its own customers, suppliers and employees; this is in line with the 'best possible information' principle promoted by the Corporate Sustainability Reporting Directive (CSRD).



3.3. INTEGRATION OF CSR TEAM INTO THE COMPANY'S ORGANIZATION CHART

Each member of the CSR team is responsible for her own topics and actions, under the supervision of the CSR Manager. Monthly meetings - as a minimum - are scheduled to follow up actions.

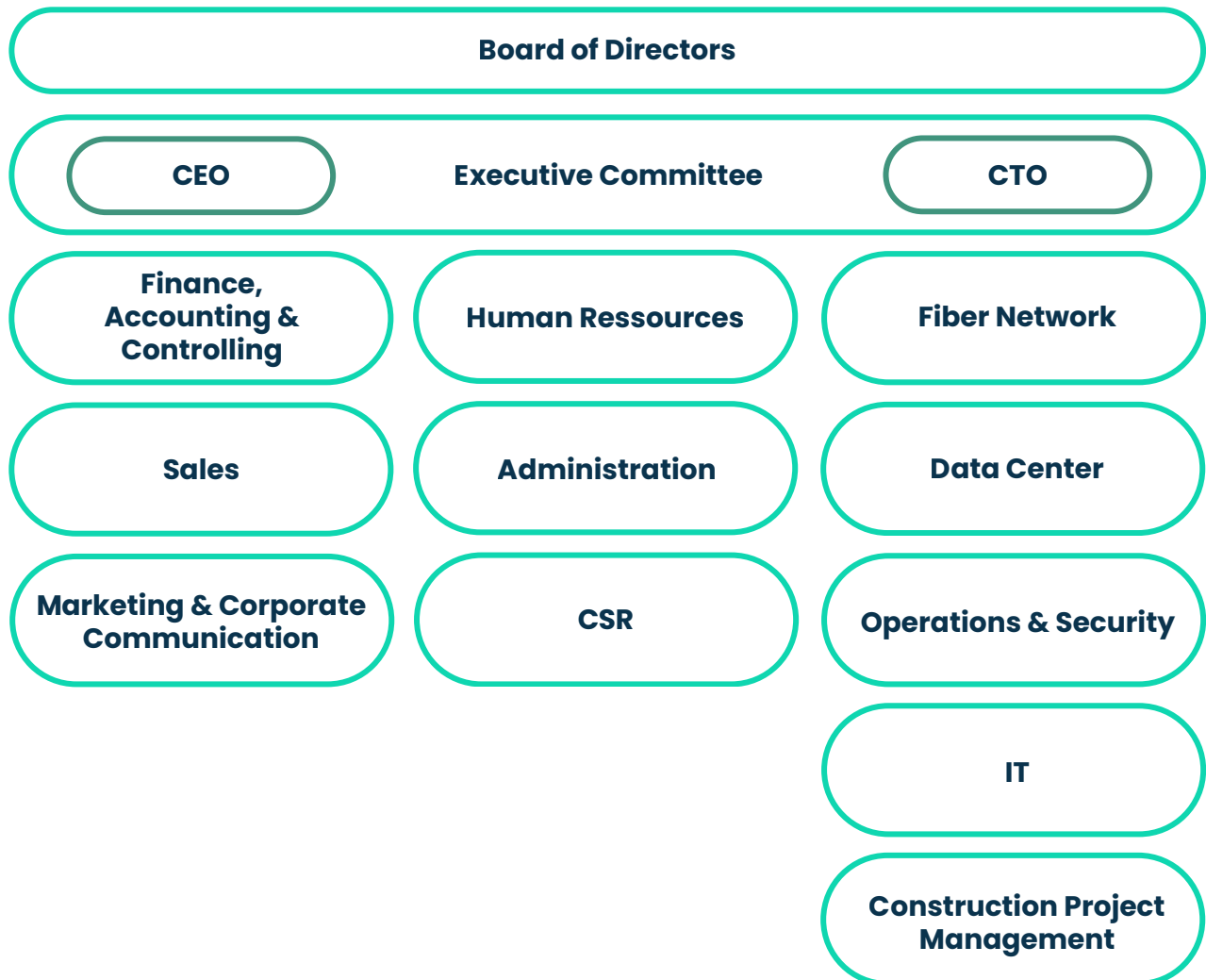
Christine De Ridder
Project & CSR Manager



Magali Panozzo
HR Manager



Martina Cappuccio
Communication Officer



4. CSR STRATEGY & ENGAGEMENTS

4.1. METHODOLOGY

At the end of 2024, with the aim of professionalizing our approach, we engaged a consultant to review our strategy. In early 2025, we selected our partner - Distinct Consulting - and defined clear objectives.

The key deliverables included:

- Identifying and mapping our stakeholders, along with the means of communication used with each group
- Creating and distributing a questionnaire to these stakeholders
- Analyzing the results and consolidating them into a simple materiality matrix
- In parallel, mapping our entire value chain
- Developing a coherent sustainability strategy based on these insights

4.2. STAKEHOLDER IDENTIFICATION

As part of our CSR strategy, we began by reviewing our existing stakeholder mapping table. This allowed us to update it and include new, relevant stakeholders. We then organized all stakeholders into five main categories: Board of Directors, Clients, Business Partners, Staff, and Communities.

For each stakeholder group, we identified the existing communication channels used to engage with them. This exercise gave us a clearer overall picture and allowed us to centralize and monitor these various interactions more effectively. This work was consolidated into a visual diagram that summarizes our overall stakeholder engagement approach.

This stakeholder mapping exercise laid the foundation for building our value chain. We analyzed all our activities, identified the inputs required, and assessed the downstream impacts of the services we deliver. This comprehensive understanding of our value chain enables us to better assess our responsibilities, optimize our processes, and create shared value for all our stakeholders - a key component of our CSR commitments.

LuxConnect stakeholders mapping

Stakeholder category

Main communication and dialogue channels

Board of Directors

- State of Luxembourg
- Shareholders
- Directors

- General Assembly
- Board meetings
- CSR report & survey

Communities

- Regulatory authorities
 - Professional associations
 - Schools & Universities
 - Associations
 - Local authorities
 - CSR partners
-
- Partnerships
 - Sponsorings
 - CSR events, reports & surveys
 - School visits & workshops

Clients

- Data Center clients
 - Dark Fiber clients
-
- Website & CSR report
 - Customer portal
 - Satisfaction & CSR surveys
 - Business review meetings
 - Business events

Staff

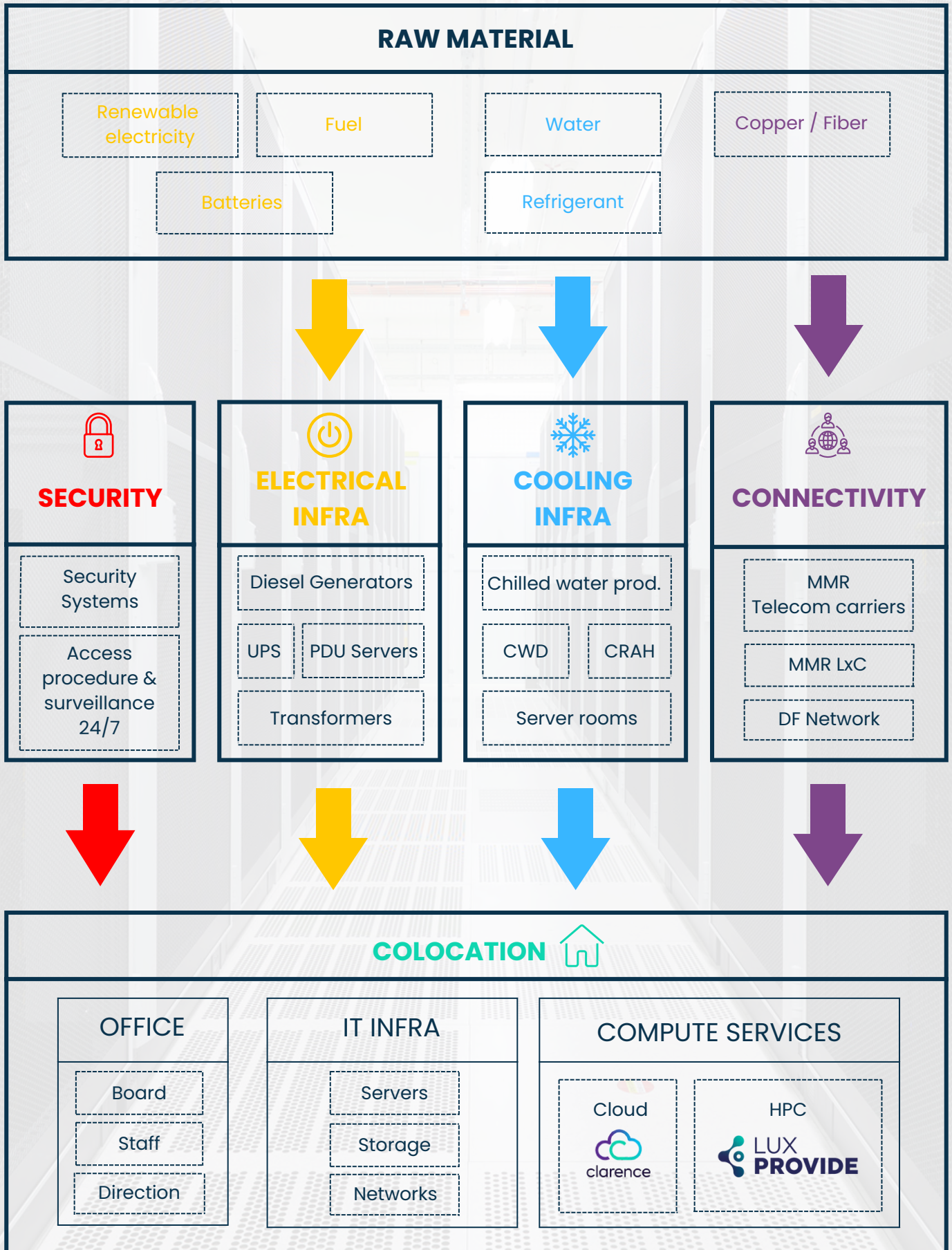
- Employees
 - Employee delegation
 - Interns
-
- Staff meetings
 - Internal newsletter / internal communications
 - Satisfaction & CSR surveys
 - Staff delegation meetings
 - General affairs meetings
 - Internal teambuildings & events

Business Partners

- Subsidiaries
 - Business partners
 - Suppliers
 - Bank & Insurance
-
- Board meetings
 - Site Manager meetings
 - Satisfaction surveys from suppliers
 - Business review meetings
 - CSR report & survey



LuxConnect Value Chain



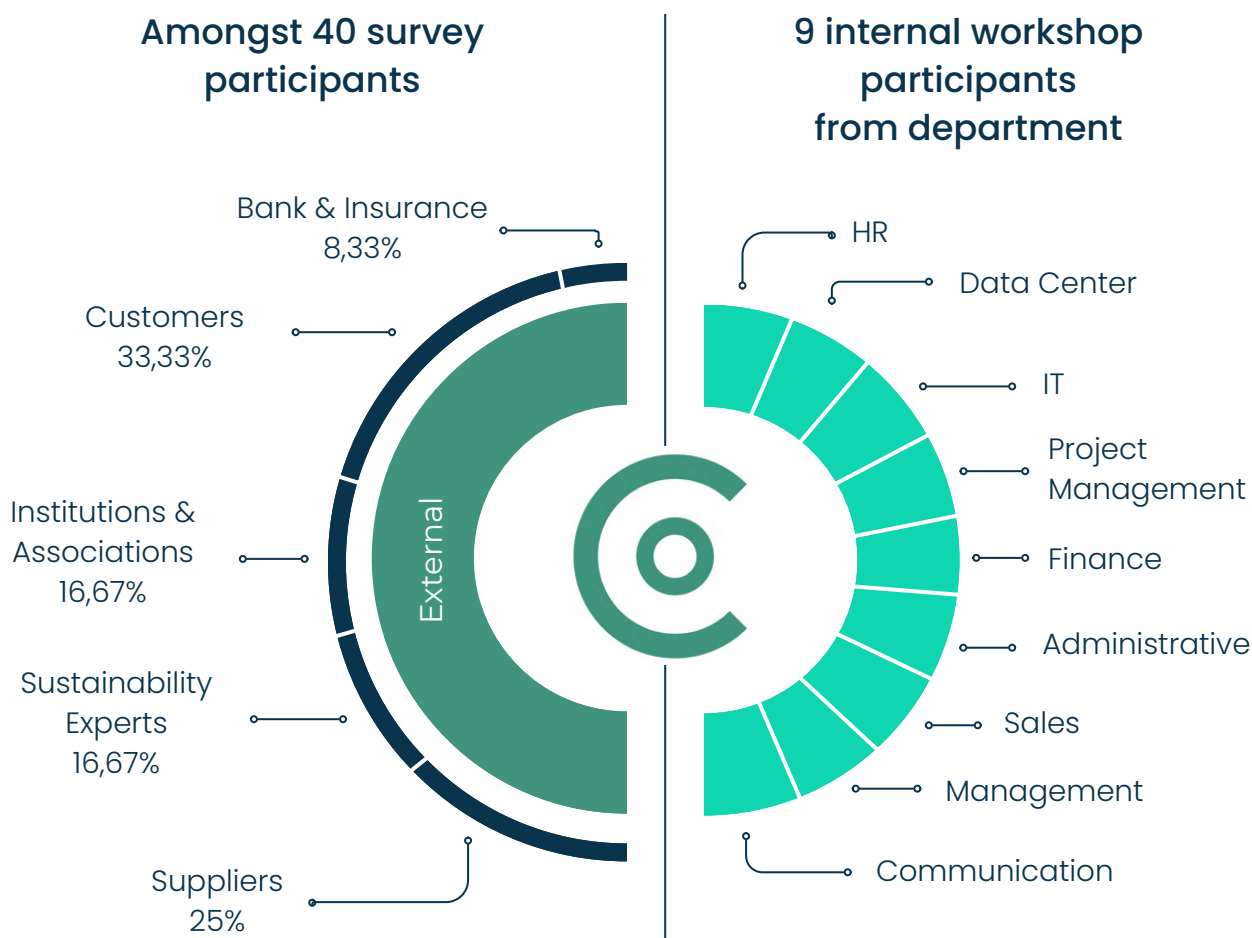
4.3. STAKEHOLDER DIALOGUE

For each stakeholder category, we identified key contacts who could be consulted to strengthen our overall approach. In parallel, we developed a dedicated survey to better understand stakeholder expectations regarding ESG (Environmental, Social, and Governance) issues and their relevance to our company.

This Stakeholder Engagement Survey was based on a benchmark study of CSR strategies adopted by other companies in our sector. Based on this comparative analysis, we identified relevant themes across the three ESG pillars. Through internal discussions and leveraging of our own expertise, we have selected between 8 and 12 topics per ESG pillar that we consider most relevant to LuxConnect.

Stakeholders were then invited to indicate their level of concern for each of these issues. The goal was to collect feedback that would allow us to better prioritize our sustainability efforts, align our actions with stakeholder expectations, and support long-term value creation.

Detailed overview

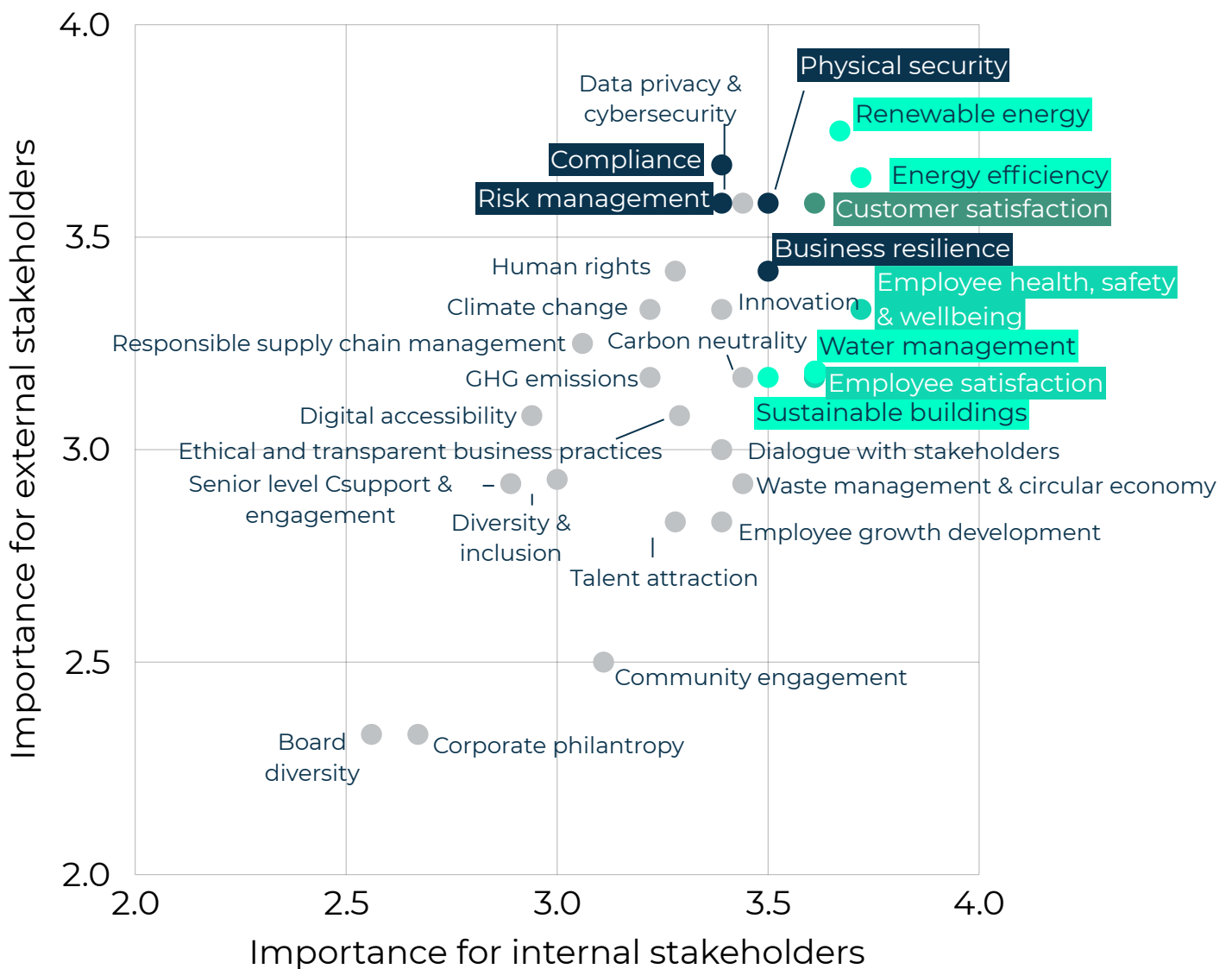


Internal workshop

Following the launch of our Stakeholder Engagement Survey, we analyzed the results during an internal workshop that brought together representatives from nearly every team within the company. This cross-functional approach ensured that a broad range of perspectives were included in the interpretation of the feedback.

Together, we reviewed the levels of concern expressed by our stakeholders across the identified ESG topics. Based on this analysis and our collective reflections, we were able to define and agree on a set of CSR priorities for LuxConnect.

4.4. MATERIALITY MATRIX



During the internal workshop, we translated the survey results into a clear set of CSR priorities, focusing on four key themes: **Clients, People, Security and Sustainability**. Some topics identified in the survey were closely related. We chose to group them under broader categories to extend the scope of our actions.

To guide our selection, we prioritized topics that scored 3,5 or higher on one of the axes of the materiality assessment and we deliberately included a people-related theme, recognizing the importance of employee engagement in our long-term vision.

Finally we chose to exclude *Data privacy & cybersecurity* from our core priorities. Although this theme appeared in the top results, it reflects a misunderstanding of our role by some stakeholders. Indeed, data protection and cybersecurity are the responsibility of our clients. This highlights a need for clearer communication around our activities.

4.5. CSR STRATEGY

Our commitment to sustainable and responsible business: "Enabling Data Security"

At the heart of our mission lies our baseline: Enabling Data Security. This reflects our dual role as both a business enabler and a trusted provider of high-security infrastructure. Our facilities offer exceptional physical protection and Tier IV Data Center resilience, ensuring an unparalleled 99,995% operational uptime for our clients. In everything we do, we are driven by responsibility - towards sustainability, our clients, our people, and the security of the data and operations we host.



Enabling Clients

We place our clients at the center of every decision. Their needs, expectations, and success guide our approach. With a strong commitment to flexibility and adaptability, we co-create solutions that evolve with their business and help them stay ahead.

Enabling People

We cultivate a collaborative and inclusive work environment that prioritizes wellbeing and empowers each team member to grow and thrive. We are actively strengthening team spirit and open communication, because we believe that together we are stronger.



Enabling Security

We rely on robust governance and advanced risk management frameworks to ensure exceptional physical security and operational resilience. Through continuous innovation and stringent standards, we protect the integrity of our infrastructure and the trust of our clients.



Enabling Sustainability

We protect the planet by optimizing energy efficiency in our environmentally responsible buildings. Our operations run on 100% renewable energy, and we continuously invest in reducing our carbon footprint to meet the highest global environmental standards.



5. CSR ACTION PLAN

5.1. GOVERNANCE

Employee satisfaction survey

As part of our commitment to continuous improvement and employee well-being, we launched an employee satisfaction survey in 2025. The survey explored a wide range of topics, including overall satisfaction and workplace atmosphere, job fulfillment and recognition, managerial support and communication, work-life balance and well-being, as well as benefits, training, and professional development. It also addressed perceptions of our Corporate Social Responsibility (CSR) approach, our company's vision and strategy, and the sense of belonging among team members, while providing space for improvement suggestions. With a strong participation rate (90% of employees), the insights gathered have given us a clearer understanding of our team's expectations and needs. These results are now serving as the foundation for a targeted action plan to enhance the employee experience within our organization.

Supporting female entrepreneurship

In 2025, we reinforced our commitment to diversity, inclusion, and equal opportunities by joining Women Excel in STEM+ (WeSTEM+) as an official sponsor. At LuxConnect, we firmly believe that talent should never be limited by gender or background.

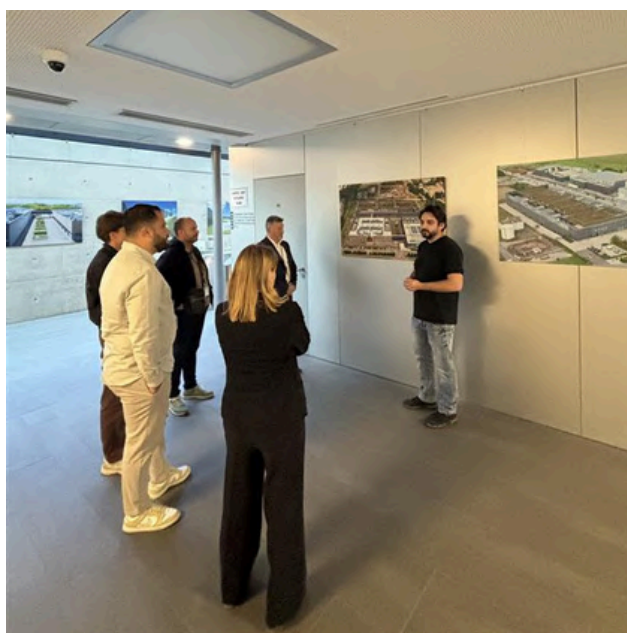
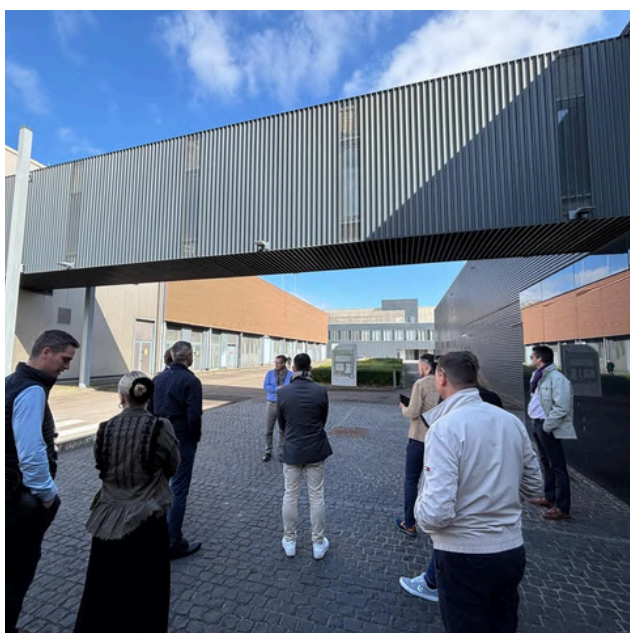
By partnering with WeSTEM+, we are actively contributing to the development of future innovators through mentorship and education. Our involvement also aims to increase the visibility of the network's impactful initiatives supporting women in STEM and entrepreneurship.

As part of this effort, we proudly highlighted the inspiring career journey of one of our female colleagues in an article published by WeSTEM+ and shared across our social media platforms. By showcasing role models within our own teams, we hope to inspire more women to pursue careers in technology and innovation.

Organize awareness-raising visits

As part of our ongoing commitment to raising awareness about the importance of sustainable digital practices, we continued our efforts in green IT advocacy throughout the year. One of the highlights was the organization of a dedicated event in collaboration with our partner R carré.

The initiative included a guided tour of our infrastructures and a joint presentation of our environmental commitments in the Data Center industry. This moment of exchange offered a unique opportunity to showcase how technological performance and environmental responsibility can go hand in hand, inspiring stakeholders to join us in building a more sustainable digital future.



5.2. SOCIAL

Organization of various events

At LuxConnect, we are committed to creating a positive and inclusive work environment that supports the well-being of our employees and strengthens team cohesion. To this end, we regularly organize a variety of internal events and team-building activities. Over the past year, highlights included a Family Day open to all LuxConnect employees and stakeholders, a Diversity Day featuring a board game to raise awareness of social inequalities followed by a shared meal, an event marking International Women's Rights Day, a New Year's gathering with our building tenants in Bettembourg, and a retirement celebration for a valued colleague.



Cybersecurity awareness

As part of our ongoing commitment to cybersecurity and employee awareness, LuxConnect's IT department conducted an internal phishing simulation campaign. The initiative aimed to assess employees' ability to recognize phishing attempts and reinforce good security practices. The campaign provided valuable insights into user behavior and helped identify areas for improvement.

Following the campaign, employees were asked to participate to a phishing awareness training to refresh their knowledge. This action supports our broader strategy to foster a strong cybersecurity culture within the company.

Review of the onboarding process

This year, we took the opportunity to review and improve our onboarding process. With several new team members joining us, it was important to ensure a warm, welcoming experience and provide a clear, structured introduction to our organization.

The updated onboarding journey now includes an overview of each department's activities, a presentation of the key tools needed for day-to-day work, and clear guidance on who to contact for specific questions. Our goal is to help new employees quickly feel comfortable in their roles and integrated into the team, fostering a positive, efficient start to their journey with us.

Passing on knowledge to future generations

As part of our commitment to social responsibility and youth empowerment, LuxConnect proudly participated in the dayCARE Hands-on 2025 initiative. This program offers students aged 14–16 the opportunity to discover professional environments through one-day internships, helping them make informed decisions about their future career paths.

In May, we welcomed a student into our IT department, offering an inside look at the daily operations of a Data Center and the key role played by our IT experts. In addition to fostering early career awareness, the initiative supports a broader humanitarian mission: each company's participation results in a donation to CARE, helping train healthcare professionals in Niger and Laos.



5.3. ENVIRONMENTAL

A new sustainable office building scheduled for completion in late 2027



LuxConnect is planning a new office building with a gross floor area of around 5.000m². Five above-ground floors and a garden level housing technical and changing rooms associate functionality and sustainability. The car park, covered by the building built on piles, remains outside to limit the impact of the construction on the site.

Designed in a responsible approach, it combines a concrete core with a wooden supporting structure. Its wooden cladding facade, made up of prefabricated, non-load-bearing elements attached to the structure, can be easily replaced without affecting the building.

Inside, wood dominates, creating a warm atmosphere, complemented by natural materials such as terracotta and clay, which contribute to hygrometric comfort. The use of raw materials and the limitation of finishes contribute to a sober and ecological approach.

The organization of the spaces reflects simplicity and efficiency. The whole complex offers an optimized working environment, combining comfort and adaptability.

Technical installations have been optimized by reducing as an example the length of ventilation ducts, with a view to achieving energy-efficient Carbon Footprint modelling. The building will be supplied with green energy provided by LuxConnect's Data Center DC1.3. Photovoltaic panels will be installed on an extensive green roof and integrated in the south facade.

Setting targets to limit carbon impact for our future administrative building

As part of the construction project for LuxConnect's new office building, it was decided to calculate the carbon footprint, considering the entire life cycle of the materials used in the construction. The consulting engineering firm Energie et Environnement S.A. is assisting us in this task and has been involved in the design of the building from the conception phase.

The aim of this calculation is to obtain the Carbon Footprint New Construction "OPTIMIZED" label according to the 2024 reference framework, which implies realizing the project's carbon footprint and reducing material-related emissions by at least 20% compared with a standard reference building.

The planned building could qualify for the "Carbon Footprint NEUTRAL" label, thanks to a reduction of more than 10% in primary energy consumption due to energy recovery from Data Center DC1.3, and to electricity generation from the photovoltaic system planned for the roof and facade, which would offset all positive operational emissions.

We are therefore continuing to work towards a Neutral label for the perimeter of embodied carbon (by offsetting residual emissions) as well as operational carbon by optimizing our future office building as much as possible, where the well-being of occupants will be one of the main qualities.

The Carbon Footprint New Construction standard has been validated by Bureau Veritas International and is based on the European LEVEL(S) framework, EN 15978 and ISO 14064-2.

Climate Neutral Data Center Pact (CNDCP)

CNDCP is the leading industry initiative uniting over 100 Data Center operators and trade associations in support of a climate-neutral digital infrastructure across Europe. The goal is achieving the ambitious greenhouse gas reductions of the climate law and leveraging technology and digitalization to achieve the goal of making Europe climate neutral by 2050. To ensure Data Centers are an integral part of the sustainable future of Europe, Data Center operators and trade associations agree to make Data Centers climate neutral by 2030.

LuxConnect being signatory of the CNDCP was an obvious step, as sustainability is part of the company's DNA.

We have completed and signed the Pact Pledge and are waiting to have an introductory call with a member of the CNDCP Board. Our membership will be confirmed after the review and approval by the Board and then LuxConnect will be listed publicly as a Pact Member.

Digital Clean Up Week

In March, we participated in Digital Clean Up Week, an international initiative designed to raise awareness about digital pollution and promote the deletion of unnecessary data.

The initiative focused on cleaning email inboxes and internal server storage. It was also accompanied by an internal campaign to raise awareness of best sustainable digital practices. Thanks to strong employee engagement, we successfully deleted 635,05 GB of data, representing a 15,11% reduction in unnecessary stored information.

This action not only helped reduce our environmental impact but also improved internal data efficiency. It reflects our ongoing commitment to promoting sustainable digital behaviours within the company.

5.4. NATIONAL PACT FOR HUMAN RIGHTS

By signing the Pacte National "Entreprises et Droits de l'Homme" (EDH) in 2022, Vincent Weynandt, CTO of LuxConnect, reaffirmed the company's commitment to integrating the United Nations Guiding Principles on Business and Human Rights into its daily operations.

**PACTE NATIONAL
ENTREPRISES ET
DROITS DE L'HOMME
LUXEMBOURG**



Key actions and progress over the past year

As part of our annual EDH verification process, we reviewed our recent actions:

- **Whistleblowing mechanism**

To increase transparency and safeguard against wrongdoing, we have set up a dedicated whistleblowing channel: whistleblowing@luxconnect.lu. We encourage all stakeholders to use it confidentially to report any misconduct directly to our Data Protection Officer, who evaluates each case and escalates it to Management and/or the Board as necessary. To date, no wrongdoing has been reported, but the mechanism remains in place as a key tool for risk detection.

- **Tools supporting our human rights due diligence**

Several deliverables developed as part of our CSR journey also enhance our human rights approach. Notably, the stakeholder identification and value chain analysis provide a clearer overview of our activities and their potential impact. This initial identification step is essential to assess which stakeholders may be most exposed to human rights risks.

- **Good practice: risk consideration in new projects**

We have begun integrating risk considerations early in the development of new activities, such as in the planning of our new building (NOB). For example, we conducted a carbon footprint assessment at the design stage and included it in tender documentation. We also updated our general conditions for future tenders, limiting subcontracting to only one level, in order to maintain better oversight and accountability.

Enhanced risk analysis methodology

Following participation in two human rights-focused events, we have improved our risk assessment methodology. We adopted a scoring tool inspired by peer best practices, which ranks each risk based on two steps:

1. Assessing probability, frequency, and severity (each rated from 1 to 4) resulting in a raw risk score.
2. Identifying existing control measures and their effectiveness (rated from 1 to 3) resulting in a residual risk score, classified as "Acceptable", "Requiring Attention" or "Requiring Action (medium term)".

This method allowed us identify two priority risks: the environmental impact of our operations and the right to disconnect, both of which will receive targeted focus in our future efforts.

Next steps

Our action plan is currently being refined based on our updated risk analysis and recommendations from the EDH verification. Key upcoming actions include:

- Strengthening employee awareness and training on human rights
- Adding a human rights clause to our Supplier Code of Conduct
- Engaging suppliers on their own human rights policies

LuxConnect remains fully committed to embedding human rights at the core of its activities and supply chain governance.

6. CONCLUSION

This year, LuxConnect has dedicated significant efforts to advancing its Corporate Social Responsibility journey. Thanks to the tailored professional CSR guidance we received, we were able to take a major step forward: identifying the need for LuxConnect and LuxProvide to pursue distinct strategies in order to maximize their impact, and professionalizing our overall approach. This professionalization is clearly reflected in this report, which now includes key deliverables such as a stakeholder analysis, value chain mapping, and a materiality matrix, all culminating in a concrete CSR strategy.

Looking ahead, we will continue in this direction by focusing on the implementation of a robust action plan. Indeed, we plan on integrating in it clear and measurable KPIs to help us achieve the objectives defined in our CSR strategy, ensuring consistency and long-term impact.

An important milestone also lies on the horizon: in October 2026 we will undergo our next CSR labeling audit, which will be the last one led by our CSR Manager, Christine De Ridder. While we will certainly miss her leadership, the continuity of our CSR commitment is assured through the dedicated CSR team. The year 2026 will also mark LuxConnect's 20th anniversary and a decade of CSR engagement - an opportunity to celebrate both our legacy and our future commitments.

Vincent Weynandt, CTO of LuxConnect and Management ambassador for the CSR Team, comments: "I would like to congratulate the entire CSR team for the tremendous work achieved this year. The professionalization of our CSR approach, as well as the increased involvement of our stakeholders, clearly demonstrates LuxConnect's determination to define the right priorities and to maximize the impact of our actions. These efforts not only reflect the company's strong commitment to sustainability but also set a solid foundation for our long-term strategy. You have my full support as you continue to drive our CSR journey forward".



APPENDIX

VSME Standards

Code	Theme	Requirement
B1	Basis for preparation – General information	Our basis for preparation is Option A (Basic Module only)
		Basis for reporting: individual basis
		NACE sector classification code: NACE K – 63.10 Computing infrastructure, data processing, hosting and related activities
		All other information related to this section are located on pages 5 to 7
	List of subsidiaries	<ul style="list-style-type: none"> • LuxProvide is located at ATRIUM BUSINESS PARK – 31, Rue du Puits Romain – L-8070 Bertrange – Luxembourg • Clarence and DCE are located at 202 Z.A.E. Wolser F – L-3290 Bettembourg – Luxembourg.
Disclosure of sustainability-related certification(s) or label(s)	<p>All labels obtained on page 9. More detailed information required:</p> <ul style="list-style-type: none"> • SuperDrecksKëscht label valid from August 2024 to August 2026 • Recertification ISO 27001 valid from 17-07-2025 to 06-06-2028 • Recertification ISO 22301 valid from 20-10-2024 to 19-10-2027 • European Code of Conduct on DC Energy Efficiency obtained on 06.02.2024 for DC1.1 and DC1.2, and on 22.03.2024 for DC1.3 and DC2. Valid until 2027 • Recertification HDS valid from 17-07-2025 to 04-05-2028 	
List of sites	All information on page 5 & 6	

VSME Standards		
Code	Theme	Requirement
B2	Cooperative specific disclosures	Not applicable
B2	Practices, policies and future initiatives	<p>Sustainability issues addressed by a practice, policy and/or future initiatives that we have put in place:</p> <ul style="list-style-type: none"> • Climate Change • Pollution • Water and marine resources • Own workforce • Workers in the value chain • Business conduct • A practice, policy and/or future initiative that is publicly available • A target which is related to a policy
B3	Total Energy Consumption	Confidential - 100% Renewable electricity
	Breakdown of energy consumption	192.000 kWh generated by our solar panels
		No refill of fuel since 2023
	Estimated Greenhouse Gas Emissions considering the GHG Protocol Version 2004 (in tCO ₂ e)	<ul style="list-style-type: none"> • Current reporting period: 01.01.2023 - 31.12.2023 • Gross Scope 1 GHG Emissions: 45 • Gross Scope 2 location-based GHG Emissions: 18.023 • Gross scope 2 market-based GHG Emissions: 2 • Total Scope 1 and Scope 2 GHG Emissions (location-based): 18.068 • Total Scope 1 and Scope 2 GHG emissions (market-based): 47

VSME Standards

Code	Theme	Requirement
B3	Estimated Greenhouse Gas Emissions considering the GHG Protocol Version 2004 (in tCO ₂ e) - entity-specific information on Scope 3 emissions	<ul style="list-style-type: none"> Purchased Goods and Services : 366 Fuel- and Energy-Related Activities (Not Included in Scope 1 or Scope 2): 1.942 Waste Generated in Operations: 42 Business Travel: 66 Employee Commuting: 22 Total Scope 3 GHG emissions: 2.438
		Total Scope 1, Scope 2 and Scope 3 GHG Emissions (location-based): 20.507
		Total Scope 1, Scope 2 and Scope 3 GHG Emissions (market-based): 1.177
	Greenhouse gas emission intensity per turnover (in tCO ₂ e/€)	<ul style="list-style-type: none"> Scope 1 and Scope 2 GHG Emissions intensity (location-based): 18.068 t CO₂e/42 M€ Scope 1 and Scope 2 GHG Emissions intensity (market-based): 47 t CO₂e/42 M€ Total Scope 1, Scope 2 and Scope 3 GHG Emissions intensity (location-based): 20.507 tCO₂/42 M€ Total Scope 1, Scope 2 and Scope 3 GHG Emissions intensity (market-based): 1.177 tCO₂/42 M€
B4	Pollution of air, water & soil	Not applicable
B5	Biodiversity	LuxConnect doesn't have sites that are located in/near biodiversity sensitive areas.
B6	Water withdrawal in 2024	<ul style="list-style-type: none"> 0 m³ of water withdrawn from all sites 0 m³ of water withdrawn at sites located in areas of high water-stress LuxConnect doesn't have production processes in place which significantly consume water

VSME Standards

Code	Theme	Requirement
B7	Resource use, circular economy & waste management	<p>Waste generated in Bettembourg & Bissen</p> <ul style="list-style-type: none"> • 200107 Non-Hazardous Waste - Wood: 6,18 t • 170703 Non-Hazardous Waste - Mixed construction and demolition waste other than mixed construction and demolition waste or separated fractions containing dangerous substances: 1 m³ • 200106 Non-Hazardous Waste - Other metals: 4,81 t • 200101 Non-Hazardous Waste - Paper and cardboard: 7,46 t • 150102 Non-Hazardous Waste - Plastic packaging: 90,1 m³ • 200201 Non-Hazardous Waste - Compostable waste: 5,5 m³ • 200208 Non-Hazardous Waste - Organic kitchen waste: 5,5 t • 200134 Non-Hazardous Waste - Batteries and accumulators other than mixed batteries and accumulators containing batteries or accumulators included in lead batteries, Ni-Cd batteries or mercury-containing batteries: 2,26 t • 200136 Non-Hazardous Waste - Discarded equipment other than fluorescent tubes and other mercury-containing waste and discarded equipment containing chlorofluorocarbons: 0,2 t • 200121 Hazardous Waste - Fluorescent tubes and other mercury-containing waste: 0,03 t • 170408 Non-Hazardous Waste - Cables: 0,4 t
	Total amount of waste generated	<ul style="list-style-type: none"> • Total Hazardous waste generated (mass): 0,03 t • Total Non-Hazardous waste generated (mass): 26,81 t • Total waste generated (mass): 26,84 t • Total Hazardous waste generated (volume): 0 m³ • Total Non-Hazardous waste generated (volume): 96,6 m³ • Total waste generated (volume): 96,6 m³

VSME Standards

Code	Theme	Requirement
B7	Resource use, circular economy & waste mgmt.	The principle of circular economy is being studied in the context of selecting certain materials available for reuse in the new administrative building project (e.g., parking pavers, lighting, etc.). Furthermore, Kiowatt transforms local wood waste into renewable energy and heat, creating a closed-loop system that minimizes waste and maximizes resource efficiency.
	Annual mass-flow of relevant materials used in 2024	LuxConnect doesn't operate in a sector using significant material flows.
B8	Workforce general characteristics	Turnover rate: <ul style="list-style-type: none"> Number of employees who left during the reporting period: 4 Number of employees at the beginning of the reporting period: 30 Number of employees at the end of the reporting period: 29
		All other information related to this section are located on page 7
B9	Workforce health & safety	<ul style="list-style-type: none"> Number of hours worked by one full-time employee in the reporting period: 1.720 Total number of hours worked in a year by all employees in the reporting period: 47.674 hours with an average of 1.490 hours per employees. All other information related to this section are located on page 7

VSME Standards

Code	Theme	Requirement
B10	Workforce remuneration, collective bargaining & training	<p>Number of annual training hours per employee during the reporting period:</p> <ul style="list-style-type: none"> • 13,38 hours for men • 5,87 hours for women <p>All other information related to this section are located on page 7.</p>
B11	Convictions & fines for corruption & bribery	<p>LuxConnect has not been subject to any convictions or fines during the reporting period</p>

LUX CONNECT

202, Z.A.E. Wolser F | L-3290 Bettembourg