

# Sustainability Report **2024**

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# Our approach to sustainability

## Empowering small businesses, driving sustainable progress

Our mission is clear: we help small and medium-sized businesses (SMBs) succeed online. SMBs are the backbone of our economy, driving innovation and fueling local growth. In today's digital world, providing these businesses with the right tools is not just our job – it's our purpose.

Our commitment extends beyond business growth. As we serve thousands of entrepreneurs, we recognise the role we play in shaping a sustainable digital economy. Sustainability is integral to our business strategy in how we support economic and environmental resilience, and social responsibility.

As I reflect on 2024, I am proud of our progress. This year, we focused on three key pillars – minimising our environmental impact, developing and deploying our Inclusion and Belonging (I&B) strategy, and further strengthening our Governance and Cybersecurity measures – each vital to shaping our industry's future.

## Decarbonisation through digitalisation

By digitising small business operations, we enable them to adopt more sustainable practices, optimise resources, and significantly reduce their carbon footprints. Through our solutions, SMBs can reduce reliance on physical infrastructure, minimise waste, and enhance overall operational efficiency.

As a digital service provider, our environmental footprint primarily stems from the energy consumption of our data centres and cloud-infrastructure. To address this, we launched a transition plan to decarbonise our operations, targeting net-zero emissions by 2040.

Currently, approximately 90% of our data centres run on 100% renewable energy. By consolidating and modernising our infrastructure, we've increased energy efficiency, reduced consumption, and decreased the environmental impact of our operations. These actions not only contribute to our decarbonisation efforts but also provide competitive differentiation and meet customer demand for sustainable cloud services.

## Reflecting our customers' diverse backgrounds

Inclusive cultures and a diverse workforce are proven to deliver better business outcomes, improve talent attraction and reduce staff turnover. By embracing diverse perspectives within our workforce, we reflect our customers' different backgrounds and are better equipped to meet their varied needs with more inclusive digital products and experiences.

This year, we launched our Inclusion and Belonging strategy, which outlines actionable steps to cultivate an inclusive workplace.

We're proud to count more than 68 nationalities among our people, and we have increased our proportion of women in leadership roles across the business from 29% in 2023 to 31% in 2024, with key hires in the Chief People Officer and Chief Transformation Officer roles. Additionally, we are integrating the EU Accessibility Act requirements into our products, making sure that all customers, regardless of ability, can benefit from our services.



**Daniel Hagemeyer**

Chief Executive Officer

## Mitigating cybersecurity risk, protecting trust

As the digital landscape evolves and cybersecurity threats increase worldwide, safeguarding customer data is more critical than ever. This year, we achieved ISO 27001 certification for information security across key markets, upgrading to the ISO 27001:2022 standards in the DACH region. We also strengthened our threat detection systems to better protect our business, and those of our customers, from emerging cyber threats, ensuring business continuity and data security.

By enhancing data protection, we not only mitigate threats but also build reputation and trust, allowing our customers to operate with confidence, so they can focus on growth without fear of disruption.

Additionally, by aligning with the European AI Act and the Digital Service Act, we ensure our products meet the highest ethical and security standards.

### Looking Ahead:

We are proud of our progress in 2024 and excited for the road ahead. As we continue to grow and evolve, we stay true to our commitment to building a sustainable, inclusive, and secure digital future for all.

Information for investors, auditors, and regulators

# Sustainability Report **2024**

This chapter outlines the scope of our reporting, including the timeline and legal entities covered—essential information for auditors and regulators. To learn more about who we are, how we operate, and our commitment to Environmental, Social, and Governance (ESG) principles, explore the following chapters.

# 01

# Scope and structure of our sustainability report

## How this report differs from the previous year

This second Sustainability Report from group.one marks the beginning of our transition to the mandatory Corporate Sustainability Reporting Directive (CSRD) and its associated guidance, the European Sustainability Reporting Standards (ESRS). It builds on our 2023 report, which followed the well-established Global Reporting Initiative (GRI) framework. At the time of this report's publication, the EU Commission has introduced the Omnibus proposal designed to simplify sustainability reporting regulations. Nonetheless, we will continue to work in accordance with the current regulatory framework, until official updates are confirmed and implemented.

As part of our preparations for the CSRD, we conducted our first double materiality assessment (DMA) in 2024. More details on how our DMA was performed can be found on page 42 and the outcomes can be found on page 14.

In future reports, we will expand on our disclosures, providing more detailed information related to CSRD requirements and further enhancing our data coverage for our acquisitions in Central Europe.

## Reporting principles: consolidation, reporting period and legal entities

This report represents our annual sustainability performance for the period 1st January 2024 to 31st December 2024. All data presented reflects activities and performance within this period. While this report should not be viewed as fully aligned with the Corporate Sustainability Reporting Directive (CSRD), it serves as a stand-alone report for the 2024 period.

The report covers group.one, represented by Redhalo Midco (UK) Limited, a privately owned company headquartered in the UK (company number 11770341). On the right-hand side, is an overview of the legal perimeter of the companies (per region) within the scope of this report.

Note that in the last quarter of 2024, we also strengthened our operations in Central and Eastern Europe through the acquisition of Český hosting s.r.o., a regional web hosting provider operating under the C4 Webhosting brand in the Czech Republic. As this took place in late 2024, they are excluded from this report.

Information on the group's sustainability performance can also be found on the company website, visit:

[www.group.one](http://www.group.one)

[esg@group.one](mailto:esg@group.one)

**Financial data:** Revenue is reported on a pro-forma basis for Redhalo Midco following our financial year which covers 1st October 2023 to 30th September 2024.

**Environmental data:** The emission factors used are IEA 2023, UK DEFRA 2023, IPCC AR4, and AR5, along with some supplier-specific emission factors. Gases included are CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, and some unspecified greenhouse gases. Emission intensity figures include emissions from Scope 1 and 2. Energy and emission intensity figures per employee are based on the total number of employees in headcount as of 31st December 2024. We used custom emission factors to assess our Capital Goods emissions based on product life-cycle assessments (LCAs). Note that numbers have been rounded off for clarity. Totals may therefore differ from the sum of parts.

**Social data:** All HR data is based on headcount as of 31st December 2024. Leadership positions refer to employees with personnel responsibilities.

**External assurance:** The sustainability statements in this report have not been externally reviewed.

## Nordics

one.com Group AB  
group.one Holding DK ApS  
one.com A/S  
GROUP.ONE NORWAY AS  
one.com SimpleSite ApS  
Zoner Oy  
Larsen Data ApS

## DACH

group.one Holding DACH GmbH  
dogado GmbH  
Herold Business data GmbH  
Alfahosting GmbH  
Profihost GmbH  
KAMP Netzwerkdienste GmbH  
Easyname GmbH  
Metanet AG  
Shore GmbH  
Shore AG

## BeNeLux

group.one Holding Benelux B.V.  
Hostnet B.V.  
Antagonist B.V.

## ROW

one.com FZ-LLC  
one.com CEBU  
one.com INDIA pvt. Ltd.  
Termly, Inc.  
group.one Holding FR SAS  
WP Media SAS

## CEE

Webglobe, s.r.o.  
Webglobe, d.o.o.

# About **group.one**

This chapter provides an overview of who we are, the products and services trusted by our 2 million customers, and the talented team driving our success as a leading digital solutions provider. These elements form the foundation of our sustainability strategy, introduced in Chapter 3.

02

# Helping small and medium-sized businesses **win online**

**We believe that small and medium-sized businesses (SMBs) are the backbone of society, driving innovation, fuelling local economies, and creating jobs. The digitalisation of SMBs is vital for building a sustainable and inclusive digital future.**

We work closely with these entrepreneurs, and we help them win online. Through our intuitive and powerful product ecosystem, we address the full range of customer needs, empowering them to thrive in an ever-changing digital landscape.

We empower SMBs to succeed with our website and Software-as-a-Service (SaaS) products. Through an integrated platform, they have access to easy-to-use digital tools, grow-as-you-go products, and local support.



## Easy-to-use online tools

Our AI-powered digital products enable SMBs to effortlessly create a website and e-shop in minutes while supporting their growth with simple customer acquisition solutions.



## Grow-as-you-go software

Understanding businesses' goals and digital maturity, we deliver tailored online products through our state-of-the-art integrated platform, enabling new solutions as they scale.



## Local expertise and support

Regional service teams are fluent in local languages and deeply knowledgeable about the market. As trusted partners, they provide expert guidance to help SMBs grow their businesses.

# Our group history

group.one was formed in 2023 with the merger of two founder-led companies group.ONE and dogado.group. Some of our key milestones are described here.

## | 2020

group.ONE enters Benelux by acquiring international hosting giant Hostnet and expands in Finland through acquisition of Zoner.

group.ONE becomes the largest .dk domain registrar.

group.ONE offers its web shop for free for SMBs needing to bring their business online due to COVID-19.

## | 2021

dogado.group adds marketing services by acquiring HEROLD in Austria and Websitebutler in Germany.

dogado achieves ISO 27001 (Security Management) certification for its web hosting and WordPress platform.

group.ONE launches a managed WordPress offering, providing automatic updates, vulnerability and health monitoring, and expands its product line to include Software-as-a-Service.

group.ONE adds further WordPress capabilities with the acquisition of WP Media, including products like WP Rocket, Imagify, and RocketCDN.

## | 2022

one.com celebrates its 20-year anniversary as a global brand and introduces WP.one, a performance hosting offering for partners and agencies.

dogado.group joins the Climate Neutral Data Centre Pact, committing to climate-neutral data centre operations by 2030.

Entry into the Swiss market as Metanet, a top hosting brand in Switzerland, becomes part of dogado.group.

group.ONE and dogado.group announce a transformative merger, creating a pan-European provider for Hosting, Marketing Services, and Software-as-a-Service.

## | 2023

The new group.one emerges after merging group.one with dogado.group, becoming a leading European Cloud Hosting provider.

group.one released its first sustainability report in 2022, before the merger, highlighting goals for responsible consumption, climate action, and gender equality.

group.one welcomes Rank Math, a WordPress SEO champion, boosting customer digital capabilities.

group.one launches the first AI-powered onboarding for website builders in Northern Europe, covering eleven languages and offering an AI-powered writing assistant for more than 4.3 million email accounts.

## 2024

Revamped our customer journey with AI driven tools: AI writing assistant and AI-powered service support.

Expanded into Central and Eastern Europe (CEE) by welcoming award-winning web hosting and domain registration brands Webglobe and C4.

Strengthened our position in the Nordic region through the acquisition of Telia Finland's domain and web hosting business.

Improved our SaaS offering with the acquisition of leading compliance and consent management platform, Termly, and booking and payments solution, Shore

Obtained ISO certifications for 14001 (Environmental Management) and 27001 (Security Management) in some of our brands and kicked off the alignment with 27701 (Privacy Information Management) for upcoming groupwide certifications.



# Empowering SMBs to **win**

**We believe in the importance of small and medium-sized businesses for our society. Our more than 2 million customers are leaders and innovators in their fields.**

That's why we've built a powerful, comprehensive suite of services to meet every online challenge. And with our local experts by their side, our customers have everything they need to reach their full potential online.

Whether our customers are looking for easy-to-use tools to launch their first website or need sophisticated solutions to streamline and scale their business, we have the tools to help them thrive. Our customer base is diverse, but we have one common goal: we help them win online.

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## + 2m customers

trust in group.one worldwide



## Solopreneurs and freelancers

With our highly intuitive online solutions, solopreneurs and freelancers can effortlessly set up and manage websites and e-commerce stores.



## Small & medium-sized businesses

Our diverse product range is tailored to the unique needs of SMBs, with our experts guiding them to the ideal solution mix for their business goals.



## Agencies and resellers

Our extensive cloud and SaaS portfolio empowers agencies and resellers to not only meet but exceed their customers' expectations and requirements.

# Our product staircase to digital success

Our customer's success is our success, and we know that small businesses have varying levels of digital maturity. Therefore, we integrate our products in a way that small and medium-sized businesses (SMB) can use them step by step.

Through our state-of-the-art integrated platform, our customers can access our entire product portfolio. As their needs change over time, they can easily integrate new products, climb the digital ladder and grow their business with us.

Our products support small and medium-sized businesses to succeed online across 3 stages of their digital journey:

01

## Present

Boosting online presence

AI-Powered Website Builder

Cloud Solutions & VPS

Email & Collaboration

Wordpress & Plug-ins

Our products such as domains, AI-powered website builder and WordPress help businesses to present their business online.

02

## Attract

Driving traffic and engagement

Website Performance

Content Optimisation

Managed Marketing

Online Privacy & Compliance

Online Marketing, Search Engine Optimisation and website performance tools help businesses to drive traffic and engagement.

03

## Sell

Fuelling commerce and growth

E-Commerce: Online-Shop

Booking & Scheduling

Payment

CRM

E-commerce and booking & scheduling products help businesses turn engagement into transactions.

# Our impact, offices and geographics

1,541

employees

19

countries

353

million euro revenue  
(pro forma)

5

operating regions  
(see graphic)

90%

data centres powered  
by renewable energy

55+

acquisitions consolidated  
in an integrated platform

20

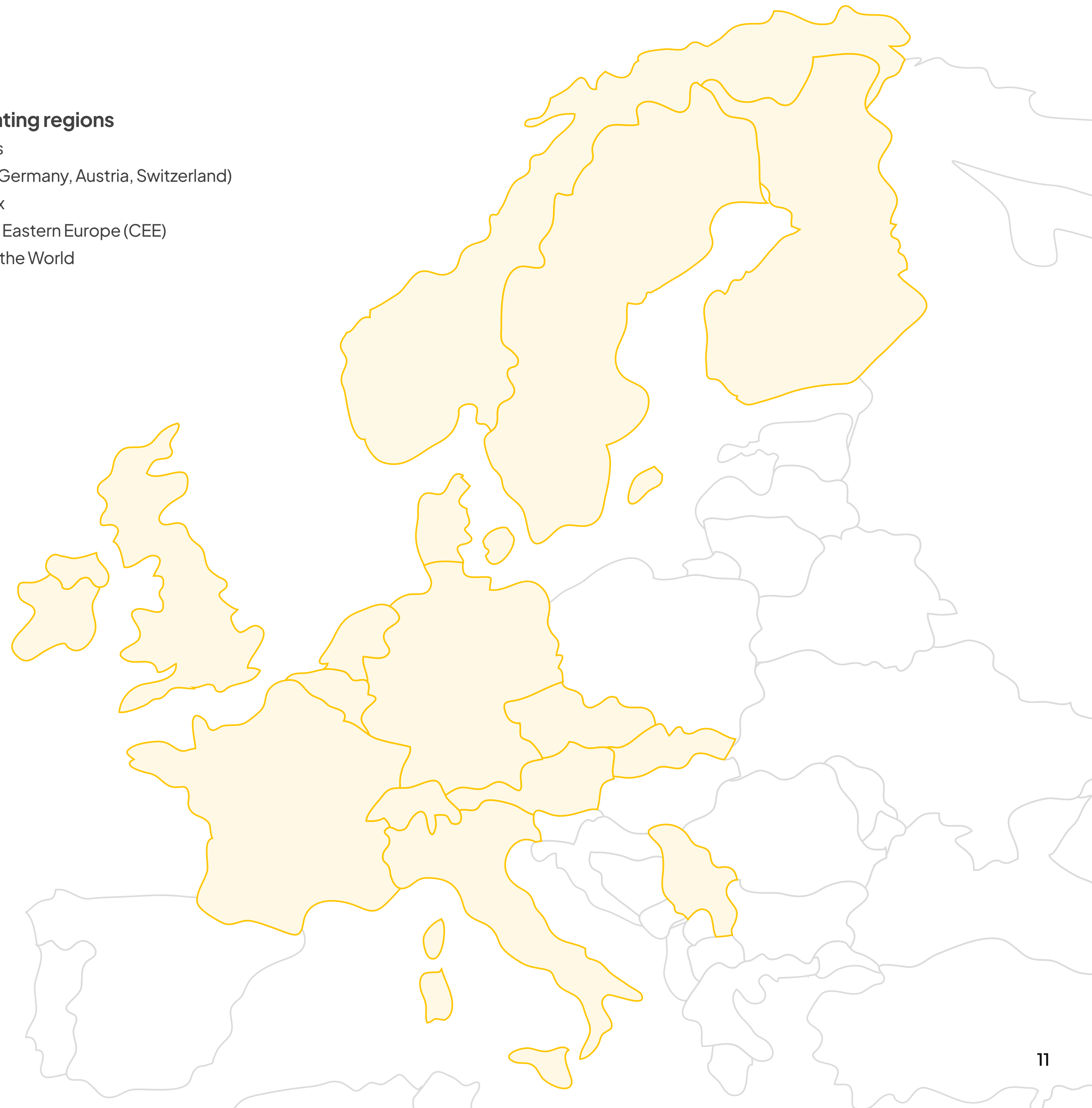
brands

31%

women in workforce

## Operating regions

- Nordics
- DACH (Germany, Austria, Switzerland)
- Benelux
- Central Eastern Europe (CEE)
- Rest of the World



# **Vision:** A partner for sustainable growth

This chapter outlines our sustainability strategy and how it drives our business while staying true to our core values. Guided by insights from employees, customers, and partners, our approach ensures we meet stakeholder expectations. We also highlight key focus areas and the initiatives we prioritise to create a lasting, positive impact.

# 03

# A partner for sustainable digital growth

## Our vision

Helping SMBs win online - Sustainably! We are not just a service provider — we are a partner in digital sustainable growth, ensuring that business success and responsibility go hand in hand. This vision comes with three sustainability goals:



### Environment

Providing energy-efficient digital services powered by renewable energy sources, ensuring we reduce both our own and our customers' environmental impact.



### Social

Capitalising on our own and our customers' different backgrounds to better support their digital journey with a broad spectrum of innovative services tailored to meet their unique needs.



### Governance

Supporting SMBs in adopting ethical and responsible digital practices, including through our compliance with regulations such as the European AI Act.

For us, sustainability is about proactively identifying and managing material risks, while creating a lasting positive impact for our wide SMB customer base. This means ensuring resilient and responsible operations, by addressing environmental, social and governance dimensions —our core sustainability pillars. These pillars are deeply embedded in our corporate strategy and in how we empower SMBs to thrive.

## Business integration:

### How our vision connects with our business model

Sustainability is at the core of our business model and reflected in our vision to help SMBs thrive online in a sustainable way. For us, ESG plays a vital role in achieving our short- and long-term ambitions while helping our customers reach their commercial and sustainability goals.

Within our operations, our sustainability strategy targets areas of greatest risk and business benefit. In a competitive employment market, by prioritising the well-being of our employees and appealing to a diverse range of candidates, we attract and retain top talent; by adopting environmental policies we reduce our energy and operational costs; and strong governance ensures we meet industry standards for data security while addressing the ethical challenges of rapidly developing technologies such as artificial intelligence (AI). Refer to our Governance chapter on page 38 for more information on our approach to AI.

## How we interact with our stakeholders to inform our strategic direction

Our key stakeholders include our customers, employees, shareholders, and regulators. Through continuous engagement we gather and incorporate feedback and insights that inform our priorities and how we execute on our three pillars.

**Our customers:** Through our sales and customer service channels of our 20+ brands, we have daily interaction with our customers. Here we gain valuable feedback on product requirements.

**Our employees:** We conduct anonymous employee surveys for open feedback, complemented by town halls. Newsletters, our intranet, and Slack channels ensure transparency and open dialogue. Our "1000 Experiments" program fosters innovation and continuous improvement across operations.

**Our shareholders:** We have an active engagement with our shareholders via the board and other representative fora, where input is provided and expectations are aligned for our Net-Zero, Inclusion and Belonging (I&B), and other strategies. Additionally, key performance indicators and achievements are regularly reported and discussed in the appropriate fora.

**Our regulators:** We engage with regulators on a case-by-case basis, when there are calls for industry submissions on potential regulations and initiatives concerning our sector. We keep track of their expectations by monitoring upcoming regulations. For more information on this matter, see Adherence to Legal Standards on page 37.

## Vision

# group.one's sustainability focus areas

In 2024, we carried out our first double materiality assessment (DMA). This assessment provided a clear understanding of our ESG impacts, risks, and opportunities, while also considering the financial and external impacts. The DMA outcomes validated our sustainability mission and goals, as presented in the previous page.

Here, we present the material impact, risks and opportunities identified and mapped to our goals and our focus areas - that directly support our sustainability vision. Additionally, this assessment represents a significant milestone in our journey to comply with the new European sustainability reporting directive (CSRD) and provides a solid foundation for our future work on our sustainability strategy and next year's reporting.

As part of our focus on sustainable operations, we have embarked on our EU Taxonomy journey. The EU Taxonomy is a leading framework for identifying environmentally sustainable economic activities. This year we observed that our business activity is included in the taxonomy under activity 8.1 (Data processing, hosting, and related activities). As next steps, we will evaluate the additional activity criteria towards alignment with the taxonomy and to meet stakeholder expectations.



## Environment

Climate change

Sustainable cloud hosting

Greenhouse Gas (GHG) emissions from electricity use in data centre operations



## Social

Own workforce

Investing in specialised training and development programmes

Employee initiatives to promote wellbeing

Attracting female talent in the tech industry

Commitment to human rights

Open-source software contribution to society

Promoting inclusion among the workforce

Gender equality



## Governance

Business conduct

Governance in AI integration

Regulation misinterpretation and privacy incidents leading to cybersecurity risk

Fines or reputational damage due to data or cybersecurity breaches

Prevention of data loss to mitigate the impact of natural disasters

AI efficiencies and opportunities

Securing and transitioning customer relationships to high-value customers

Integrating ethics into business operations

Integrating ESG due diligence into the acquisition process

# Sustainability

## corporate governance

### Sustainability oversight

The Board of Directors of group.one’s parent company is responsible for oversight of sustainability impacts, risks, and opportunities with support from the Audit and Remuneration Committees. Our Chief Executive Officer is responsible for sustainability issues at the Board level and holds executive responsibility. In 2024, the Chief People Officer, reporting to the Chief Executive Officer, holds operational responsibility for our sustainability and HR guidelines and policies. We recruited an ESG Director in 2024 to lead the implementation of our sustainability agenda.

### Our board of directors consists of eight members:

**Mette Kamsvåg**

Chair of the Board: Independent NED\*

**Thomas Railhac**

Cinven: NED\*

**Letizia Bellucci**

Cinven: NED\*

**Felix Rieger**

Cinven: NED\*

**Eric Hargrave**

Ontario Teachers’ Pension Plan: NED\*

**Dominika Åberg**

Ontario Teachers’ Pension Plan: NED\*

**Jacob Jensen**

Founder of one.com: NED\*

**Daniel Hagemeier**

Chief Executive Officer

The Board also ensures appropriate governance, including Sustainability matters, responsible for oversight of the focus areas with the management team.

It is the highest non-executive governance body providing strategic guidance and oversight of the company’s performance. The duties of the Board are partially executed through its Audit & Risk Committee and Remuneration Committee.

The Audit and Risk Committee holds three scheduled meetings every year. The committee, comprised of selected Board members, is responsible for preparing matters that will be subject to Board approval. The Board and its committees are responsible for overseeing key risks - strategic, legal, regulatory, financial, and operational - and ensuring that appropriate mitigation measures are in place. Duties also include approval of the annual report and review of audit findings, review of the group’s internal control environment, and the annual review of policies.

The Remuneration Committee also comprises several Board members. The committee holds four scheduled meetings per year and prepares remuneration topics that are subject to board approval. The committee reviews management team

compensation on an annual basis and evaluates the CEO’s performance. The committee also reviews succession planning for key employees.

The C-suite management team consists of the following (as of year-end 2024): Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Technology Officer (CTO), Chief Information Officer (CIO) Chief People Officer (CHRO), Chief Product Officer (CPO), Chief Transformation Officer (CT-O), and multiple commercial leaders for our different regions.

### Our approach to risk management

We identify, assess, and manage key risks to achieve our strategic and operational goals. A risk registry is maintained to track identified risks, assess their impact, and monitor mitigation efforts. Our risk management process is designed to proactively address risks and support the management team in implementing effective strategies for their mitigation.

In the following chapters, we explore our Environmental, Social, and Governance (ESG) initiatives, highlighting our performance in 2024, our key achievements, and our goals for each area moving forward.

# Environment: Caring for our planet

This chapter outlines our key environmental focus areas, including our emissions reduction plan, supporting procedures, processes, and certifications. It provides a comprehensive overview of our 2024 actions, including the development of our ambitious net-zero by 2040 strategy, and offers insights into our plans for 2025 and beyond.

As of this year, we are mapping our Environmental disclosures to the Climate Change focus area, identified through our double materiality assessment. This is based on our efforts to align to best practices and the consideration that greenhouse gas emissions and energy use are both integrated with our actions to mitigate climate change impacts.





# Minimising our environmental impact

To fulfil our commitment to environmental responsibility, we must actively minimise the negative impact of our operations while empowering our customers to achieve their own sustainability goals.

This requires a strategic and proactive approach to integrating sustainable practices across our value chain. In line with this commitment, we have identified two key initiatives that form the foundation of our environmental efforts:



## Key area 1:

### Emission reduction (net-zero by 2040)

As part of our commitment to reduce emissions to net-zero by 2040, we've compiled environmental data for the 2024 calendar year, including our energy usage, and calculated our greenhouse gas (GHG) emissions footprint.

To support us in achieving net-zero emissions by 2040, we developed interim Scope 1, 2, and 3 short-term emissions reduction targets for 2030. These targets represent a 40% reduction for Scopes 1, 2, and 3. Our short- and long-term net-zero reduction targets were inspired by the principles of the Science Based Targets initiative (SBTi), the most robust and widely used greenhouse gas emissions reduction target-setting framework. It ensures that actions align with what science defines as necessary to limit global warming and tackle climate change.

## Key area 2:

### Policies, processes and certifications

We have pursued new certifications and ratings to attest to our best-in-class environmental controls and ambition.

# Our climate change **roadmap**

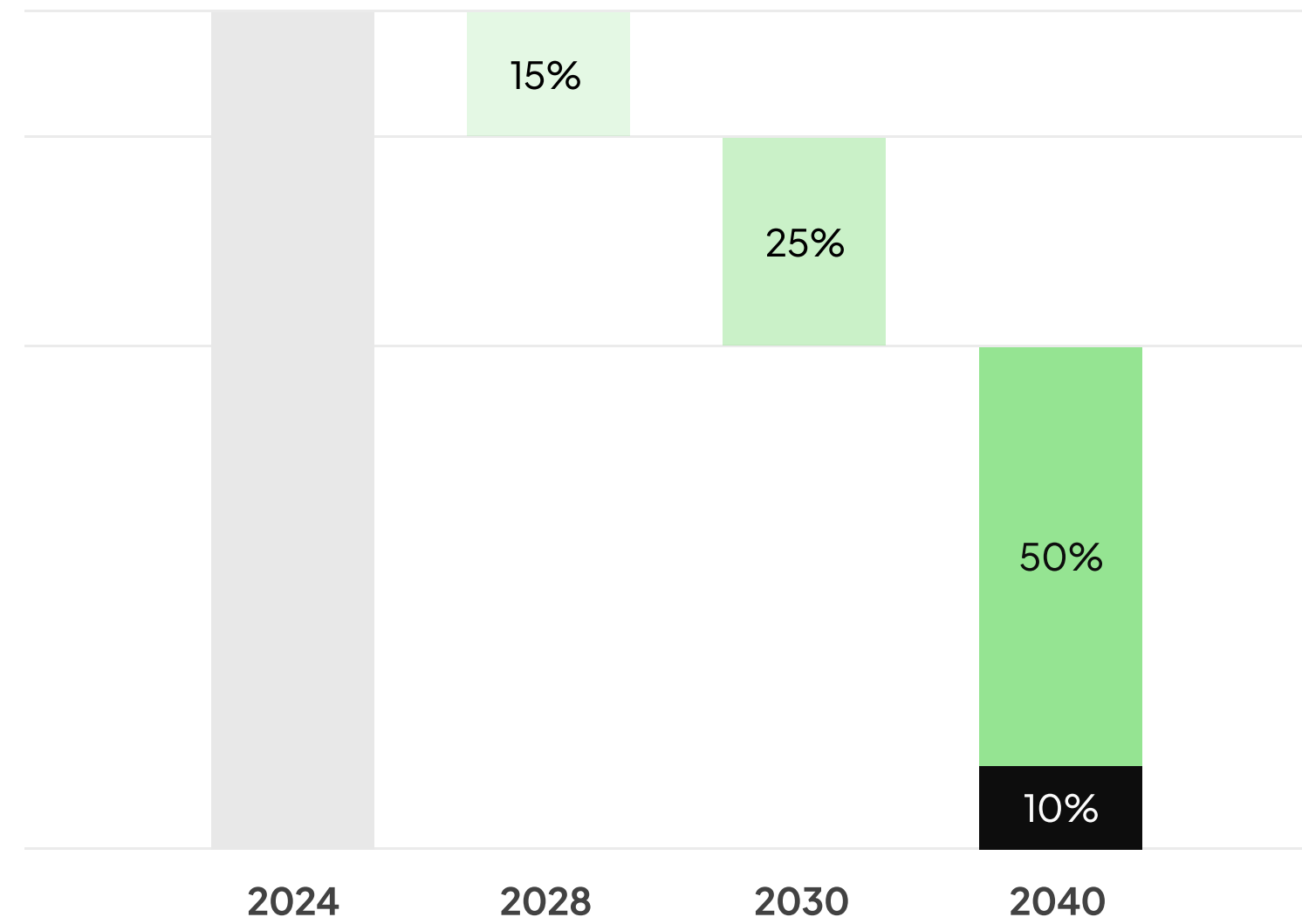
Key Area	2024 achievements	Plans for 2025 and beyond	Progress is measured through
<p><b>Key area 1:</b> Emission reduction (net-zero by 2040)</p>	<ul style="list-style-type: none"> <li>Developed short-term 2030 emissions reduction targets across Scope 1, 2, and 3 (inspired with SBTi methodology).</li> <li>Developed emissions reduction roadmaps to achieve our short-term 2030 target and long-term 2040 net-zero commitment.</li> <li>33 of our 37 data centres are powered by renewable energy, as a result of our net-zero strategy and wider consolidation plan.</li> <li>Integrated Scope 2 emissions reduction plans into office property management plan.</li> <li>Implemented a fleet management plan that supports our Scope 1 emissions reduction plans.</li> <li>Began implementation of e-waste collection in selected locations.</li> <li>Assessed our main suppliers regarding their emissions reduction plans and hardware disposal services.</li> </ul>	<ul style="list-style-type: none"> <li>Deployment of our net-zero roadmap, with a focus on ramping-up Scope 2 and 3 emission reductions and its integration with our M&amp;A strategy.</li> <li>Continuous improvements to our data quality.</li> <li>Select a main hardware supplier that contributes to our operations and energy efficiency improvements and aligns with 2040 net-zero goals.</li> <li>Commence reporting on our e-waste emissions as soon as feasibly possible.</li> </ul>	<ul style="list-style-type: none"> <li>Energy use</li> <li>Share of facilities (offices and data centres) sourcing renewable energy for their operations.</li> <li>Annual GHG emissions.</li> </ul>
<p><b>Key area 2:</b> Policies, processes and certifications</p>	<ul style="list-style-type: none"> <li>ISO/EMS 14001:2015 certifications, ensuring compliance with Environmental Management Systems.</li> <li>Continued response to the CDP Climate Change questionnaire.</li> <li>Further integration of ESG principles into decision-making processes for long-term value creation.</li> <li>Updating the Group-wide ESG Policy, focusing on sustainability and ethical practices.</li> </ul>	<ul style="list-style-type: none"> <li>Increase awareness of the ESG Policy across all regions and departments.</li> <li>Expand ISO 14001 certification to additional entities and regions.</li> <li>Improve the CDP Climate Change score.</li> <li>Continue providing education and training for employees on sustainability and ethical practices.</li> </ul>	<ul style="list-style-type: none"> <li>Certification audits (ISO/EMS 14001:2015) and assessments from third-party evaluators.</li> <li>CDP Climate Change questionnaire results and scoring trends.</li> <li>Employee engagement surveys, and feedback.</li> </ul>

# Emission reduction (net-zero by 2040)

During 2024 we reevaluated our emissions reduction strategy to align it with our net-zero by 2040 commitment.

This is a key strategic priority of our ESG strategy, reflecting our high ambitions, strong sustainability focus, and our aim to contribute to the Paris Agreement climate goals: limiting warming to 1.5 degrees Celsius compared with pre-industrial levels. Our transition plan roadmap towards our net-zero by 2040 commitment is structured in three phases, as outlined on the right side of this page.

Our 2040 target and its three phases are grounded in a robust strategy built on our five emission reduction levers that align with our business objectives, strengthen our competitive advantage, and use sustainability as both a differentiator and a revenue driver.



- 2028: Unlocking Scope 1 and 2 reductions by reinforcing policies and initiating behavioural changes.
- 2030: Ramping up Scope 2 and Scope 3 decarbonisation initiatives.
- 2040: Deep decarbonisation of Scope 3.
- Offset the residual ~10% emissions

## Our 5 key emission reduction levers:

- 01 Sourcing renewable energy** for our offices, company cars, and data centres
- 02 Improving energy efficiency** in our offices and data centres
- 03 Electrification** of our company cars
- 04 Supplier engagement** to assess and select suppliers aligned to our 2040 net-zero targets
- 05 Behavioural changes** encouraging employees to adopt low-carbon commuting and business travel practices

# Monitoring our greenhouse gas emissions

To ensure we are effectively managing our environmental impact, we have set an emissions baseline for 2024, incorporating our expanded operations in Central and Eastern Europe (CEE). This baseline ensures that our carbon footprint is measured, tracked, and managed across all our regions. For an overview of legal entities included in our footprint, please see page 5.

We focus on minimising our environmental impact by effectively tracking, managing, and reducing emissions across all scopes. The majority (78%) of our GHG emissions come from Scope 3 activities, primarily from IT hardware for our data centres and offices (Capital Goods), services purchased (Purchased Goods and Services), and employee commuting.

Scope 2 emissions are material for our industry due to our high energy consumption. However, thanks to the significant strides we have made in sourcing renewable electricity, in 2024 our Scope 2 emissions represented only 17% of our emissions.

Finally, our Scope 1 emissions are relatively minor (5%). They stem primarily from company vehicles used by field sales and service personnel to reach customers.

**Scope 1 – direct emissions from fuel consumption:**

Company cars (fuel), generators

**Scope 2 – indirect emissions from purchasing electricity and heat:**

Data centres, offices, company cars (electric)

**Scope 3 – Indirect emissions from the rest of our value chain:**

Business travel, employee commuting, purchasing hardware

Emissions scope and category	group.one emissions (tCO <sub>2</sub> e)	% of total (market-based Scope 2)
Scope 1	376.9	5%
Scope 2 (market-based)	1,380.4	17%
Scope 2 (location-based)	4,853.3	19%
Scope 3	6,482.2	78%
– Scope 3.1 – Purchased goods and services	3,623.4 –	44% –
– Scope 3.2 Capital goods	1,004.2 –	12% –
– Scope 3.3 Fuel- and energy-related activities	286.1 –	3% –
– Scope 3.6 Business travel	212.7 –	3% –
– Scope 3.7 Employee commuting	1,355.8 –	16% –
<b>Total Scope 1, 2, &amp; 3 (market-based)</b>	<b>8,239.5</b>	<b>100%</b>
<b>Total Scope 1, 2, &amp; 3 (location-based)</b>	<b>11,712.4</b>	<b>23%</b>

**8,239.5** tCO<sub>2</sub>e

scope 1, 2 & 3 emissions market-based

Our 2024 emission performance resulted in 1 ton of tCO<sub>2</sub>e per employee and 5 tons of tCO<sub>2</sub>e per million of revenue.

Note that these numbers are not comparable to our performance disclosed in our 2023 report due to our company expansion/acquisitions in 2024. Additionally, in 2023 we reported these intensity metrics using location-based emissions. As the year 2024 and market-based emissions reporting have been used as our baseline for target setting, we will disclose comparative figures in next year's report to display the impact of our emissions reduction actions going forward.

# Our actions on emission reduction levers 1 & 2

## Renewable energy and energy efficiency

Two levers that are central to our emissions reduction plan are (i) sourcing renewable energy and (ii) improving energy efficiency. Both levers are driven by the need to secure energy supply, manage energy costs and deliver on our 2040 net-zero plan. We identified these due to their relationship to our Scope 2 consumption, primarily the electricity consumption required at our data centres and offices, which represents approximately 90% of our total Scope 2 emissions. These two also indirectly impact our category 2 (Capital goods) and category 3 (Fuel- and energy-related activities) in our Scope 3 emissions, relating to the energy efficiency of the IT hardware equipment used in our operations, and our energy consumption losses<sup>1</sup>.

Energy consumption	Non-renewable	Renewable	Total
Electricity	2,292.4	13,918.7	16,211
District heating	2,425.4	0	2,425
District cooling	0	0	0
Steam	646.3	0	646
Fuel	1,420.5	0	1,421
<b>Total</b>	<b>6,784 (33%)</b>	<b>13,919 (67%)</b>	<b>20,703</b>

## Our data centres' impact

Sustainability is a fundamental criterion for our data centre consolidation strategy and other strategies to improve operational efficiency. Our data centre consolidation plan prioritises renewable energy suppliers and ensures that as we streamline our operations we also enhance energy efficiency.

Following is an overview of our status by operating region:

- **Nordic, BeNeLux, and Rest of the World (RoW):** We have historically maintained a strong focus on sourcing renewable energy in all our data centre locations.
- **DACH:** All our target data centres run on renewable energy, except for one minor location which is subject to a migration in 2025. Additionally, our group-owned KAMP data centre in Oberhausen, Germany, transitioned to 100% renewable energy in 2024, serving as a flagship for our sustainability efforts. This data centre obtained an EcoVadis Silver Medal in 2023 and is a signatory of the Climate Neutral Data Centre Pact, an initiative aimed at achieving climate neutrality at data centres by 2030.
- **Central Europe:** Our operations in the region expanded significantly with our recent acquisition of Webglobe – a cloud and web hosting business. In 2024, we initiated the assessment of the environmental impact of the added data centre facilities, which included exploring consolidating and/or transitioning to sourcing renewable energy, as applicable.

As a result of our initiatives in 2024, 33 of 37, or approximately **90% of our data centres operate on 100% renewable energy.**

## Our offices' impact

As part of our property strategy, which integrates our plans to source renewable energy, we have conducted a thorough analysis of occupancy and type of energy across all locations. The outcome of the occupancy assessment led to the retirement of certain offices and the expansion of others. The energy analysis showed that in 2024, 9 of our 29 offices are fully powered by 100% renewable energy. Additionally, we have started to engage landlords to explore opportunities for transitioning more of our offices to renewable energy. Sourcing renewable energy in our offices which are located in shared buildings presents challenges, however, as we are not the sole decision-makers, we must collaborate with other tenants to come to a mutual agreement and ensure a collective shift towards renewable energy.

In 2024, these initiatives resulted in 67% of our total energy consumption coming from renewable sources, and 72% reduction of our total scope 2 emissions.

90%

of our data centres operate on 100% renewable energy.

67%

of overall energy consumption coming from Renewables

<sup>1</sup>This refers to energy lost during transmission and distribution before it reaches group one. These losses occur due to inefficiencies in the energy system, which are beyond our control. Therefore, when we consume less energy, it also means we have less transmission and distribution losses to account for.

# Additional actions from 5 key emission levers

## + Electrification

We developed a fleet management plan to identify ways to enhance the electrification of our fleet, reduce our fleet size whenever possible, and reduce our reliance on fossil fuels.

## + Behavioral changes

We implemented a travelling tool that helps manage employees' business travel, allows users to select sustainable travel options, and helps improve data quality for our business travel emissions tracking.

## + Supplier engagement

We assessed our main hardware suppliers, evaluating their operational efficiency and e-waste management strategies to align with our sustainability ambitions.

## In addition to our five key levers, we have also devoted efforts to our e-waste management

We gave a second life to 97% of our disposed hardware equipment in our Nordic region data centre through our local partner. We plan to expand our e-waste collection and measure e-waste emissions in the coming years in all our locations to help reduce our environmental impact.



**13 MWh**  
per employee

**59 MWh**  
per million EUR revenue

# Policies, processes and certifications

Minimising our environmental impact has been an integral part of our way of working for many years, which has streamlined our approach, and contributes to our agility. Moving forward, we will continue our progress towards best practices and will implement additional policies and procedures necessary to strengthen our sustainability efforts.

In addition to the policies included above, we also have the following certifications, or associated alignment (per legal entity and brand), contributing to our Environmental performance, as presented below

Additionally, we continued to provide transparency for stakeholders such as customers, partners and investors through participation in the CDP Climate Change questionnaire in 2024. We received a D rating in 2024, which reflects changes to the CDP scoring methodology from 2023 (where we received a C rating). We aim to improve this score moving forward, and this by no means represents a decrease in our sustainability engagement.

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## ESG Policy

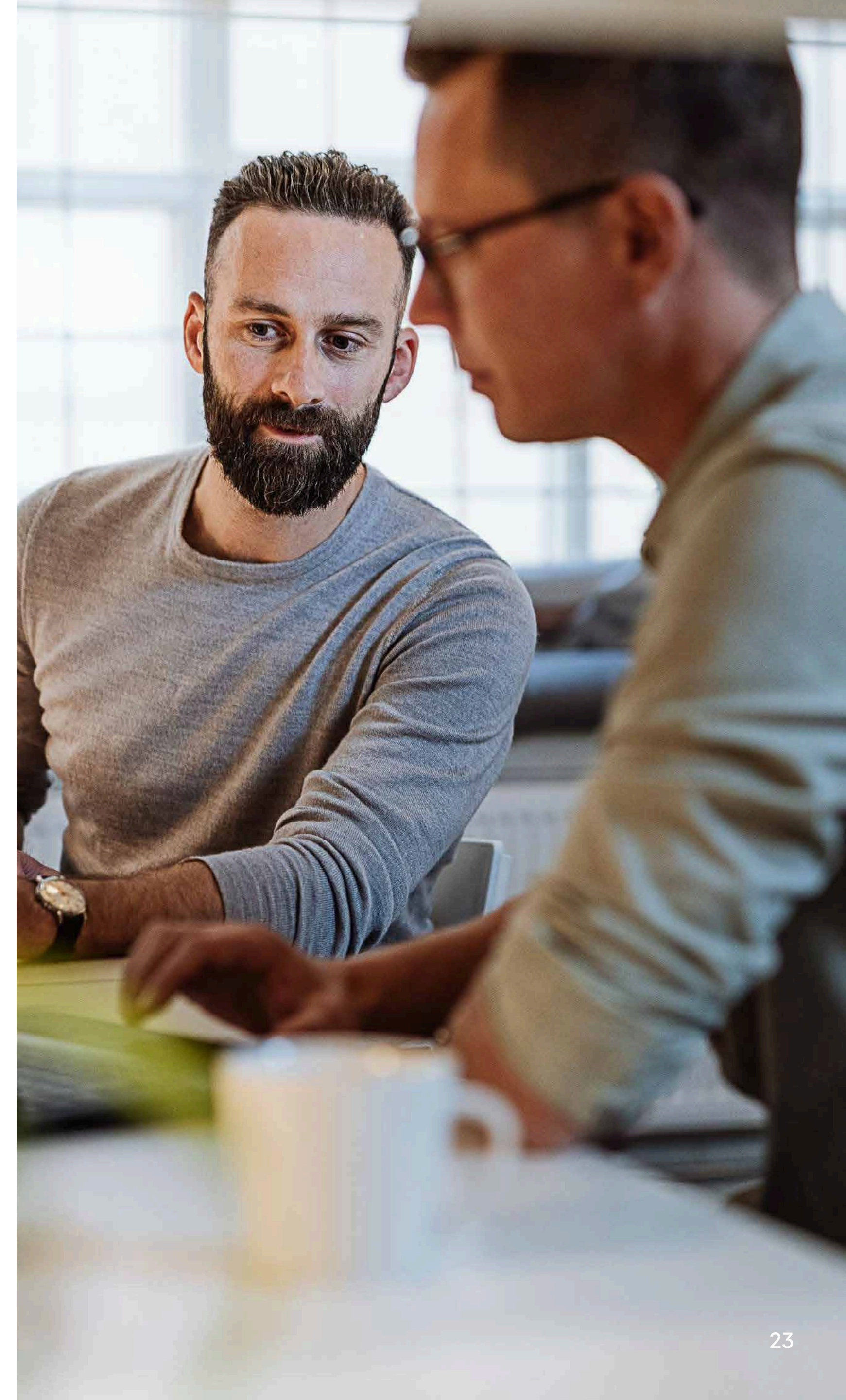
Our group-wide Environmental, Social, and Governance (ESG) Policy guides our sustainability and ethical practices. It outlines strategies for reducing our environmental footprint and others.

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## International Organisation for Standardisation (ISO) / Environmental Management System (EMS) 14001:2015<sup>1</sup>

Currently, our brands Hostnet and KAMP have obtained ISO 14001 certification in 2024. We aim to expand our ISO 14001 certification across the group moving forward as we continue to strengthen our environmental commitments.

<sup>1</sup> ISO certifications are internationally recognised standards to ensure quality, safety, and efficiency in specific matters (e.g. environmental management).



# Social: Focusing on our own workforce

This chapter outlines our core social priorities—inclusion and belonging, health and safety, and talent development—integral to our sustainability strategy. We review key initiatives from 2024, plans for 2025 and beyond, and our broader contributions to society, reinforcing our commitment to lasting impact.

In this year's report, we are mapping our Social disclosures to our Own Workforce focus area, one of the focus areas identified through our double materiality assessment. This is based on our efforts to align with best practices and the consideration that Inclusion and Belonging (I&B); health & safety; and talent attraction, retention, development and performance are primarily integrated with our employee-related actions. However, as I&B also covers stakeholders in addition to our employees, these are also presented here for clarity.

# 05



# Empowering our team and embracing our customer perspectives

As a people-centric company, our employees are at the core of everything we do.

Our People Strategy provides a guiding framework for our workforce, focusing on four key areas outlined on this page. While the strategy sets a long-term vision, its launch also introduced immediate initiatives, including an HR calendar detailing key actions for the year ahead.



## Key area 1:

### Inclusion and belonging (I&B)

At the heart of our People Strategy is our newly launched Inclusion and Belonging (I&B) initiative. We've also enhanced our HR organisation by implementing a new structure, strengthening regions and introducing specialist functions to drive engagement, rewards, data accuracy, and people development.

## Key area 2:

### Health and safety

We have expanded our HR team with additional roles and expertise to improve our Health & Safety procedures and data quality.

## Key area 3:

### Talent attraction, retention, development, and performance

Over the past year, we have invested in data management and digitalisation to enhance tracking, generate deeper insights, and refine our people processes. One key example is our partnership with a leading engagement platform, enabling us to gather and analyse feedback from our globally distributed teams to better understand their various needs and opinions.

## Key area 4:

### Policies, processes and certifications

We have focused on assessing the policies relevant to our key social topics.

# Our own workforce **roadmap**

Key Area	2024 achievements	Plans for 2025 and beyond	Progress is measured through
<b>Key area 1:</b> <b>Inclusion and belonging</b>	<ul style="list-style-type: none"> <li>Initiated an I&amp;B strategy and launched an Awareness Day featuring ambassadors and activities focused on celebrating different perspectives.</li> <li>Hosted inclusion awareness training globally.</li> <li>Improved People Data for better insight and fact-based decision-making.</li> <li>Strengthened communication internally with newsletters and local town halls.</li> </ul>	<ul style="list-style-type: none"> <li>Establish an ambassador programme to promote engagement in relevant I&amp;B initiatives, tackling local challenges.</li> <li>Run an annual Inclusion Index survey to assess work inclusion, work culture and talent retention.</li> <li>Participate in a mentorship programme and support candidates in finding their desired roles.</li> <li>Perform equal pay assessments.</li> </ul>	<ul style="list-style-type: none"> <li>Gender and age distribution metrics.</li> <li>Anti-discrimination and anti-harassment complaints submitted through our whistleblowing channel, and associated investigations.</li> </ul>
<b>Key area 2:</b> <b>Health and safety</b>	<ul style="list-style-type: none"> <li>Expanded our HR team to drive wellbeing insights.</li> <li>Continued improving our employee wellbeing metrics (e.g. work-related injuries).</li> </ul>	<ul style="list-style-type: none"> <li>Continue to focus on zero work-related injuries and fatalities.</li> </ul>	<ul style="list-style-type: none"> <li>Work-related injuries.</li> <li>Days off work due to work-related injuries.</li> </ul>
<b>Key area 3:</b> <b>Talent attraction, retention, development and performance</b>	<ul style="list-style-type: none"> <li>Focused on leadership development in our DACH region.</li> <li>Strengthened our HR team with an updated organisation structure and new roles (ESG, Engagement, and Reward).</li> <li>Established a new Talent Acquisition system (teamtaylor) aimed at strengthening employer branding.</li> <li>314 new hires.</li> <li>Launched our people and talent strategy, including an HR calendar with activities to be rolled out in 2025.</li> <li>Established a new attractive pension scheme for our Swedish employees.</li> <li>Turnover rate below industry index.</li> </ul>	<ul style="list-style-type: none"> <li>Set up a new global Human Resource Management System to improve data insights.</li> <li>Launch our 'Perform and Learn' performance management process focused on people development.</li> <li>Deploy learning budgets as a core component of our people practices.</li> <li>Develop aligned job profiles for compensation benchmarking exercises.</li> <li>Conduct a structured compensation benchmarking in 2025.</li> <li>Enhance benefit offerings and reinforce our position as a top employer.</li> </ul>	<ul style="list-style-type: none"> <li>Employee turnover and new hires.</li> <li>Employee retention and performance metrics.</li> <li>Engagement score through employee surveys.</li> </ul>
<b>Key area 4:</b> <b>Policies, processes and certifications</b>	<ul style="list-style-type: none"> <li>Continuous application of the Groupwide Code of Conduct, I&amp;B Policy, Anti-Harassment and Anti-Discrimination Policy, and Modern Slavery statement for UK operations.</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing awareness reinforcement of the Code of Conduct across the group.</li> <li>Expand I&amp;B initiatives with focused efforts on removing barriers to inclusion.</li> <li>Enhance awareness and training on anti-harassment and anti-discrimination actions.</li> </ul>	<ul style="list-style-type: none"> <li>Tracking I&amp;B metrics, employee satisfaction surveys related to inclusion and I&amp;B training participation.</li> <li>Complaints and resolution rates, and employee feedback on workplace experience.</li> </ul>

# Inclusion and belonging

As a global tech company operating in 19 countries and 46 cities, it is important for us to embrace the perspectives of the communities we serve. This helps us better understand our customers' needs, drive innovation, and unlock new market opportunities.

In 2024, we launched a comprehensive I&B strategy to enhance inclusion and establish ourselves as the sector's leader and employer of choice. Centred on three pillars—customers, society, and employees—it reinforces our commitment to fostering inclusivity across all areas.

31%

of our workforce consists of women

68

nationalities in our workforce

## Goals

**Customers:**  
Further integrate I&B into our business relationships.

**The broader society:**  
Inspire others to promote positive change in building a more inclusive and equal society.

**Our employees:**  
Continue to enable a safe and equal working environment for our people at every level of the organisation.

## Actions in 2024

In 2024 we started to transition our products and marketplaces to the EU Accessibility Act, directed at improving the accessibility of our products for customers with diverse abilities. These initiatives were kicked off in our main brand in 2024 and will continue to be implemented further.

As part of this strategy, we have begun exploring nonprofit organisations that are working towards a more inclusive and equal society, intending to partner and make a meaningful impact. Initiatives will be identified in 2025 as we continue to deploy our strategy in all our operating regions.

At group.one, we have zero tolerance for discrimination or harassment based on age, gender, race, ethnicity, religion, disability, sexual orientation, or any other characteristic protected by law. To further promote these values, we launched our Inclusion and Belonging (I&B) strategy.

As part of our strategy, we held our first 'Celebrate Our Differences Day', a day aimed at bringing forward diverse profiles/teams and highlighting their contribution to society or our team and hosting a voluntary company-wide unconscious bias training. Additionally, I&B Ambassadors and Mentorship programmes were presented, which are set to be rolled out in 2025.

Commitment to I&B is reflected in our progress toward achieving a balanced gender ratio in an industry historically dominated by men. In 2024, women represented 31% of our total employees (an increase from 29% last year) and maintained at 38% of our Board of Directors and 29% at the C-suite level, demonstrating tangible progress toward our inclusion goals.

We will continue raising awareness of the strategy while building partnerships to enhance inclusion and belonging locally or in the sector.

## 👤 Social – Key area 1

### Gender distribution – all employees

Gender	2023		2024	
	Employees	%	Employees	%
Male	874	71%	1,066	69%
Female	351	29%	475	31%
<b>Total</b>	<b>1,225</b>	<b>100%</b>	<b>1,541</b>	<b>100%</b>

### Gender distribution – top management <sup>1</sup>

Gender	2023		2024	
	Employees	%	Employees	%
Male	170	81%	163	81%
Female	40	19%	39	19%
<b>Total</b>	<b>210</b>	<b>100%</b>	<b>202</b>	<b>100%</b>

### Full/Part time distribution – all employees

Type	2023			2024		
	Female	Male	Total	Female	Male	Total
Full time	273	769	1,042	379	960	1,339
Part time	78	105	183	96	106	202
<b>Total</b>	<b>351</b>	<b>874</b>	<b>1,255</b>	<b>475</b>	<b>1,066</b>	<b>1,541</b>

### Age and gender distribution – all employees

Age	2024		2023		Total
	Women	%	Men	%	
Below 30	133	9%	263	17%	396
30–50	305	20%	721	47%	1,026
Above 50	37	2%	82	5%	119
<b>Total</b>	<b>475</b>	<b>31%</b>	<b>1,066</b>	<b>70%</b>	<b>1,541</b>

Age	2023		2024		Total
	Women	%	Men	%	
Below 30	99	8%	243	20%	342
30–50	225	18%	569	46%	794
Above 50	27	2%	62	5%	89
<b>Total</b>	<b>351</b>	<b>29%</b>	<b>874</b>	<b>71%</b>	<b>1,225</b>

## New metrics for 2024

As we transition to the new reporting standard, we have updated our I&B metrics. This year, we have enhanced our reporting by including employee data by contract type and gender, building on last year's framework. Our performance in 2024 is presented below.

We value our employees' privacy, and any data collected is handled responsibly. We only collect personal information needed for employee contracts, as required by law. For the countries we operate in, this involves a binary gender definition (male and female). We therefore do not collect any information beyond what is reported here, as these are only used for legal and administrative purposes. We safeguard the rights of our non-binary and other gendered employees through inclusion awareness training and by addressing complaints, as applicable, through our whistleblowing channel.

### Gender Distribution per Employees' Contract Type

Employment type	Female	Male	Total
Permanent	421	913	1,334
Temporary	30	69	99
Contractor	24	84	108
<b>Total</b>	<b>475</b>	<b>1,066</b>	<b>1,541</b>

# Health and safety

**At group.one, we take a holistic approach to employee well-being, addressing physical health, mental health, and work-life balance. As a global company with a diverse workforce across multiple regions, we view hybrid and remote work as a valuable contributor to work-life balance, offering employees greater flexibility to manage their personal and professional lives.**

While we recognise the potential challenges that remote work may bring, particularly in terms of mental health and the blurring of boundaries between work and personal time, we invest in enhancing our people management capabilities and leveraging digital tools to monitor employee data. These actions help us to better address impacts and emerging concerns connected to the wellbeing of our employees. Our core markets also have a comprehensive wellbeing programme that includes stress management, fitness initiatives, and mental health support, designed to help

employees navigate remote and hybrid work demands. We make sure that, at a minimum, each country we operate in complies with health & safety regulations and monitors incidents, in alignment with guidelines and insurance requirements.

In 2024, we recorded two work-related injuries globally, both in Germany. These were traffic-related injuries on the employees' way to work, with one requiring a day off work for recovery and the other a couple of weeks. Although these injuries did not happen at work, we have reported them as work-related injuries as per German law. Our other operating regions (i.e., Nordics, Benelux, Rest of the World, and Central and Eastern Europe) reported zero work-related injuries and consequently zero days off work.

Most importantly, there were no fatalities across any of our locations, reflecting our strong adherence to maintaining a safe and secure working environment.

2

reported work-related injuries

0

fatalities across any of our locations

# Talent attraction, retention, development and performance

**Our success depends on attracting and retaining top talent capable of driving innovation and adapting to technological advancements. Attracting skilled professionals is only the beginning—we invest in their growth to help them excel and become future specialists and leaders. Through a culture of continuous development, we provide access to courses, certifications, and internal knowledge-sharing platforms, empowering employees to reach their full potential.**

Recognising the influential role of our leaders, we focused on leadership training in the DACH region in 2024, designed to inspire further positive development.

This year, under the leadership of our Chief People Officer, we strengthened our HR team by implementing a new regional structure and adding specialised functions in ESG, Engagement, Talent Acquisition, and

Reward. We also introduced Teamtailor, a new talent acquisition system, to enhance recruitment efforts and attract individuals with the right skills and cultural fit. These investments led to the hiring of 314 new employees across our teams.

By analysing talent attraction and retention metrics, we identified key areas for improvement. As part of our strategy, we offer tailored benefits to meet the diverse needs of our global workforce, with country-specific packages that align with local regulations and cultural expectations.

## **Our employee value proposition encompasses:**

1. Flexible working arrangements
2. Remote-friendly policies
3. A dynamic international work environment
4. Engaging social events at all locations
5. Competitive, locally tailored benefits

As part of our commitment to attracting and retaining top talent, we introduced a new pension scheme and enhanced the insurance package for employees in Sweden, one of our major markets. These improvements have a tangible impact on employee health and safety (see prior section).

Our proactive focus on employee engagement and support, offering growth opportunities, has resulted in a turnover rate significantly below industry benchmarks, ensuring that we retain and engage top talent during periods of change.

We measure engagement through quarterly pulse checks and an annual survey, providing insights into employees' perceptions of the workplace, their experiences, and key influences on work life. These survey results provide a foundation for dialogue and action, enabling us to create a culture where our people can excel and thrive.

Our Executive Suite holds regular town halls to foster two-way communication and share actions based on insights from company-wide surveys. We also use virtual platforms to foster transparent, inclusive dialogue across regions.

Over the past year, 192 employees left group.one, resulting in a 12.6% turnover rate—significantly lower than the tech industry average of 13–18%<sup>1</sup>. This reflects both our continued growth and our ability to attract top professionals in a highly competitive market.

<sup>1</sup><https://business.talkspace.com/articles/tech-industry-turnover-rate>

# 12,6%

Employees turnover

# Our contribution to local communities

We strive to create an inclusive labour market that provides opportunities for all while also developing our future workforce and talent. Guided by this commitment, our Delhi office in India supports two local major programs:

## Educational support

As part of this initiative, we have partnered with Akshaya Patra, a non-profit organisation based in Bengaluru, India. The foundation is dedicated to eliminating classroom hunger by providing nutritious meals to children in government and government-aided schools. In addition, Akshaya Patra works to combat malnutrition and uphold the right to education for children from socioeconomically disadvantaged backgrounds.

## Empowering future skills and talent

Punarjagran Samiti is a non-profit organisation dedicated to children's education and women's empowerment. It helps women achieve financial independence through skills development, knowledge, and access to information. In partnership with Punarjagran Samiti, we fund a street school that provides primary education to approximately 25 underprivileged children, equipping them with essential skills for the future.



# Policies, processes and certifications

Caring for our people is well rooted in our organisation, with a focus on respecting the human and labour rights of our workforce as well as our customers and the wider society. Our policies in social areas, as detailed in the table below, address material social topics. Collectively, these processes demonstrate how we uphold our values.

Policy / Directive	Scope
<b>Code of conduct</b>	The groupwide Code of Conduct underlines and summarises our existing group policies and directives and contains rules and principles governing day-to-day activities related to human rights, labour rights, and other sustainability matters.
<b>Inclusion and belonging (I&amp;B) policy</b>	Our groupwide I&B Policy is designed to foster a workplace where all employees are treated with fairness and respect. It promotes equal opportunities, removes barriers to inclusion, and ensures a diverse workforce that can contribute to innovation, collaboration, and success.
<b>Anti-harassment and anti-discrimination policy</b>	Our groupwide policy prohibits all forms of harassment and discrimination, ensuring a safe, inclusive, and respectful work environment for everyone. While the group follows a unified approach, some brands may have tailored versions to meet local or operational requirements.
<b>ESG policy</b>	Our groupwide Environmental, Social, and Governance (ESG) Policy guides our dedication to sustainability and ethical practices. It outlines strategies for enhancing our social responsibility and other sustainability matters. This policy integrates ESG principles into decision-making to drive long-term value for our stakeholders.
<b>Whistleblower policy</b>	We provide a secure and confidential whistleblower channel for reporting unethical behaviour or violations of company policies without retaliation in this groupwide policy
<b>Modern slavery</b>	Our UK modern slavery statement outlines our efforts to prevent modern slavery and human trafficking within our operations and supply chains.



# Governance: Protecting customers and building trust

This chapter outlines our governance priorities to protect our customers' businesses, including information security, whistleblower protection, anti-corruption, anti-bribery, anti-money laundering, and strict compliance with legal standards. We detail key initiatives from 2024 and our strategic plans for 2025 and beyond to strengthen these critical areas, ensuring long-term resilience and trust.

As of this year, we are mapping our Governance disclosures to the Business Conduct focus area, identified through our double materiality assessment. We ensure compliance and apply best practices in areas including information security, anti-corruption, anti-money laundering. Further, we ensure strict adherence to applicable laws and regulations to ensure the highest standards of responsible business, building trust and strong relationships with our stakeholders.



# Protecting our customers' business

As a provider of digital products and services, we recognise that our stakeholders, especially our customers, depend on the reliability and resilience of our digital infrastructure.

Our commitment is to ensure transparency and integrity in our operations, prevent misuse of our digital infrastructure, and uphold ethical practices in the AI services we use and offer.

In 2024, we continued to focus on 4 key areas.



## Key area 1:

### Information security

Information security remains a top priority for us. We take a proactive approach by continuously expanding and updating our certifications to safeguard our infrastructure and ensure integrity at every stage of the customer journey. These efforts are essential to maintaining the trust of the millions we serve. Learn more about our comprehensive approach and key initiatives under Information Security on page 35.

## Key area 3:

### Adherence to legal standards

We further strengthened our sustainability governance by appointing an ESG Director to lead the implementation of our ESG strategy. This role has been instrumental in assessing sustainability legal standards, enhancing our governance framework, and building trust with stakeholders.

## Key area 2:

### Whistleblowers and anti-corruption, anti-bribery, and anti-money laundering

We continued to codify best practices to ensure a high standard of ethical business conduct.

## Key area 4:

### Policies, processes and certification

We have pursued additional ISO certifications in support of our Information Security goals and ambitions.

# Our governance **roadmap**

Key Area	2024 achievements	Plans for 2025 and beyond	Progress is measured through
<b>Key area 1:</b> <b>Information security</b>	<ul style="list-style-type: none"> <li>• Successful recertification of our existing certified DACH brands and upgraded our the latest ISO27001 version, being 2022.</li> <li>• Active monitoring, threat intelligence gathering and threat analysis.</li> </ul>	<ul style="list-style-type: none"> <li>• Replace for: Expand existing ISO 27001 certification within the group.</li> <li>• Continue aligning our processes and controls to best practices and our adherence to existing and upcoming cybersecurity regulation.</li> </ul>	<ul style="list-style-type: none"> <li>• Substantiated incidents of privacy breaches or loss of customer data.</li> </ul>
<b>Key area 2:</b> <b>Whistleblowers and anti-corruption, anti-bribery, and anti-money laundering</b>	<ul style="list-style-type: none"> <li>• Addressed grievances promptly through internal procedures.</li> <li>• Expanded leadership oversight, including the Chief People Officer alongside the Chief Financial Officer.</li> </ul>	<ul style="list-style-type: none"> <li>• Expand whistleblower channel accessibility, improving access for external stakeholders.</li> <li>• Increase awareness of the whistleblower channel internally.</li> </ul>	<ul style="list-style-type: none"> <li>• Confirmed corruption, bribery, and money-laundering incidents through submitted whistleblowing complaints.</li> </ul>
<b>Key area 3:</b> <b>Adherence to legal standards</b>	<ul style="list-style-type: none"> <li>• Conducted a double materiality assessment to guide improvement of our strategy and controls.</li> <li>• Hired an ESG Director to lead implementation of our ESG agenda.</li> <li>• Continued monitoring the regulatory landscape to gain understanding of future requirements, as applicable.</li> <li>• Began our journey towards EU AI Act compliance.</li> </ul>	<ul style="list-style-type: none"> <li>• Implement ESG criteria into the M&amp;A process.</li> <li>• Continue aligning our policies, controls, and processes with sustainability regulations.</li> </ul>	<ul style="list-style-type: none"> <li>• Annual sustainability report published</li> <li>• Annual ESG roadmap review</li> <li>• Yearly discussions on sustainability impacts, risks, and opportunities.</li> </ul>
<b>Key area 4:</b> <b>Policies, processes &amp; certifications</b>	<ul style="list-style-type: none"> <li>• Continuous application of Groupwide whistleblower and Information Security policies.</li> <li>• Continuous application of Anti-Corruption Policy for DACH region, in addition to our Group-wide whistleblower policy, to ensure compliance with local anti-corruption laws in Germany, Austria, and Switzerland.</li> </ul>	<ul style="list-style-type: none"> <li>• Promote awareness and ease to access to whistleblower procedures across all regions and departments.</li> <li>• Expand anti-corruption policies and enhance employee training on ethical behaviour, as applicable and locally needed.</li> <li>• Continue strengthening information security practices and expand training programs on data protection.</li> </ul>	<ul style="list-style-type: none"> <li>• Follow-up actions and resolutions on whistleblowing reports.</li> <li>• Number of compliance violations.</li> <li>• Number of incidents reported, response time, and effectiveness of incident resolutions.</li> </ul>

# Information security

**Information security is at the core of our operations, ensuring the protection of consumer and end-user data across our products and services. We continuously assess vulnerabilities, monitor emerging threats, and apply rigorous security controls to safeguard both our infrastructure and our customers. Recognised as a critical priority in our sector, information security is a material area identified in our double materiality assessment (see page 14), reflecting its significance as a key risk within our organisation.**

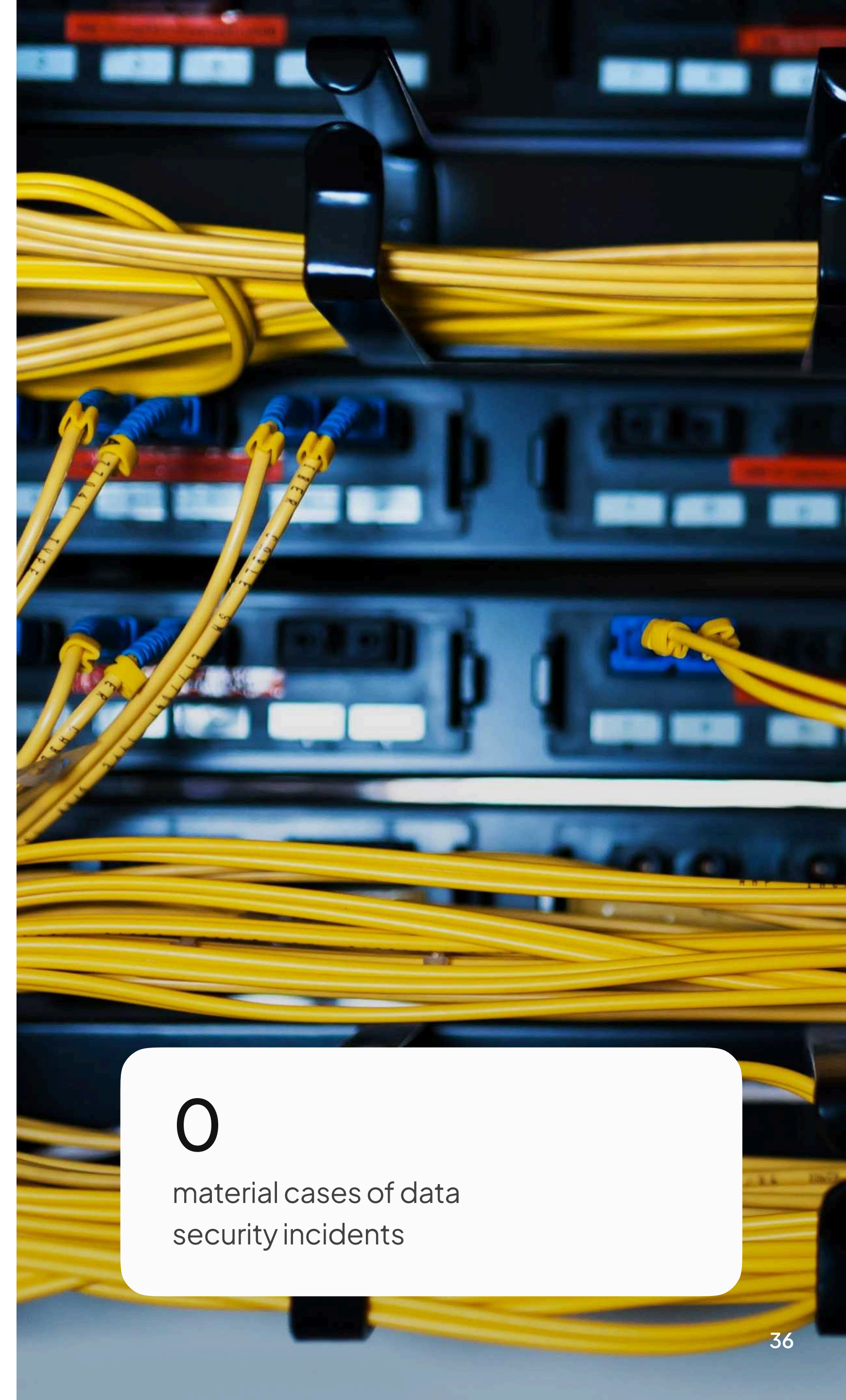
Security is embedded in both product development and operational processes to minimise threats and protect our customers from cyber risks. This proactive approach enables us to adapt to an evolving threat landscape and enhance our security controls as needed. Our Group Information Security Team collaborates across all departments to ensure security remains a top priority and that employees stay up to date with the latest privacy and security protocols.

We adhere to industry best practices, including International Organization for Standardization (ISO) certifications, and comply with regulations such as the General Data Protection Regulation (GDPR) to safeguard customer and user data.

We adhere to industry best practices, including International Organization for Standardization (ISO) certifications, and comply with regulations such as the General Data Protection Regulation (GDPR) to safeguard customer and user data. Transparency is fundamental to our approach—we clearly communicate how personal data is collected, processed, and stored in compliance with GDPR, whether through product interfaces or direct communication via email. In 2024, we continued strengthening our information security processes, extending certifications across our core brands. For more details on our security frameworks and certifications, refer to key area 4 – policies, processes and certifications on page 39.

We have an active monitoring and threat mitigation process for conducting vulnerability assessments and security controls. To track progress, we measure substantiated incidents concerning breaches of customer privacy and loss of customer data. In 2024, we had zero material substantiated complaints regarding information security incidents, maintaining our information security performance quality from 2023. Responsibility for information security oversight rests with the Chief Information Security Officer (CISO) in close collaboration with our CEO.

0 material cases of data security incidents



# Whistleblowers and anti-corruption, anti-bribery and anti-money laundering

**group.one maintains zero tolerance for breaches of our group.one’s code of conduct and ethical guideline, which requires employees to uphold laws and standard relating to corruption, bribery, money laundering, discrimination, and harassment.**

To uphold this commitment, we have implemented robust systems to prevent, detect, and address misconduct. Below, we outline our approach to anti-corruption, anti-bribery, and anti-money laundering.

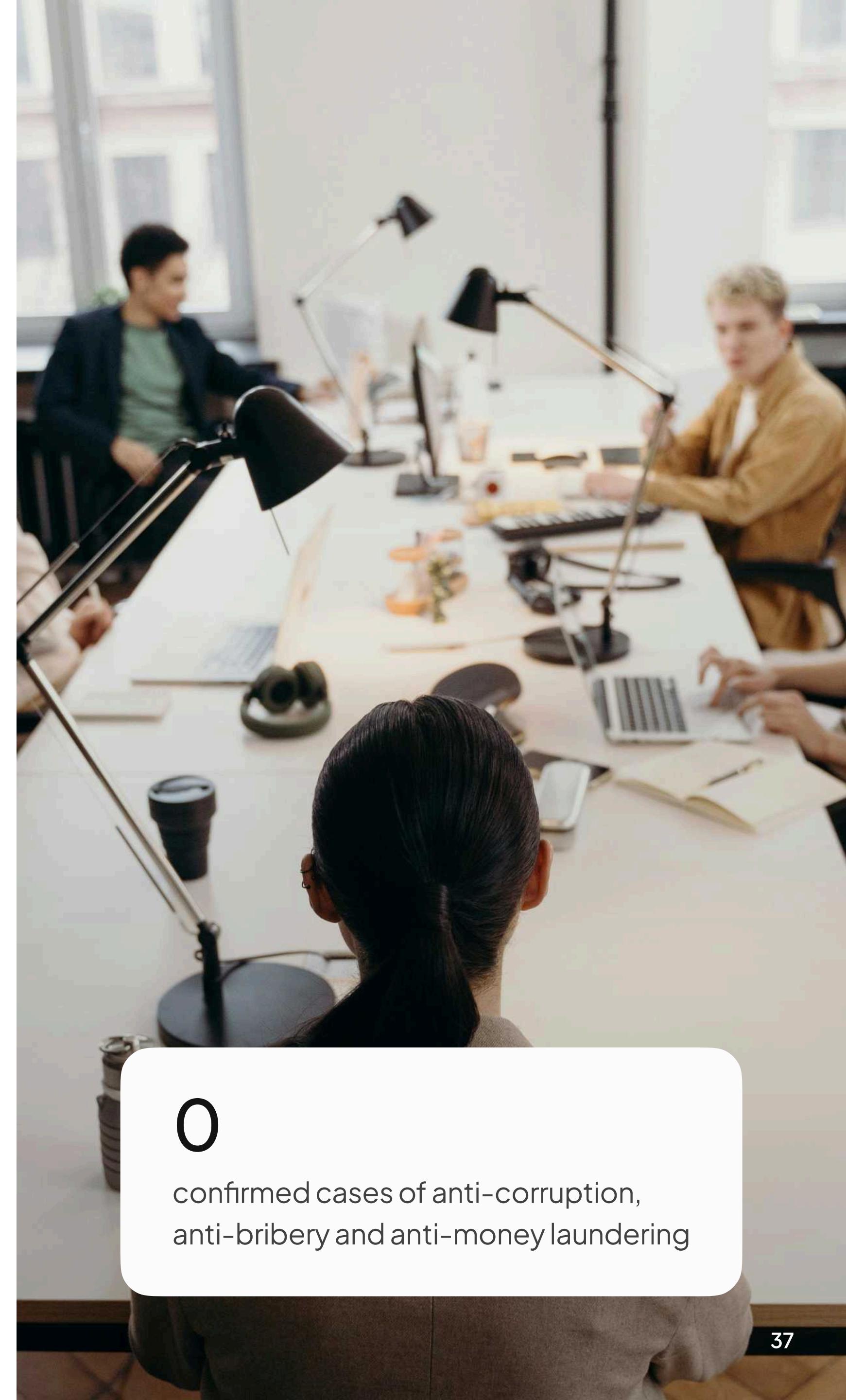
Any deviation from our zero-tolerance principles, such as allegations of corruption or money laundering, can be reported through our whistleblower channel and managed in line with our Whistleblowing Policy. Upon receiving a complaint, the Chief People Officer or Chief Financial Officer mobilises the appropriate teams for assessment and resolution.

To measure our progress, we track complaints and report on confirmed incidents of corruption, along with the actions taken. In 2024, we recorded zero confirmed cases of money laundering or bribery, reinforcing our commitment to zero tolerance.

While other complaints were submitted through our whistleblower channel, they primarily related to operational improvements in our offices.

0

confirmed cases of anti-corruption, anti-bribery and anti-money laundering



# Adherence to legal standards

**To drive the success of our sustainability strategy and key focus areas—Climate Change, Our Workforce, and Business Ethics—we must integrate our principles into everyday practice. Our corporate governance framework, outlined on page 15, ensures accountability by engaging the Board in strategic decisions and enabling management to consistently monitor operational impacts, risks, and opportunities.**

Aligned with our governance framework, we strictly adhere to legal standards, ensuring compliance and accountability. To maintain this, we continuously monitor regulatory changes across our operations to anticipate future requirements.

In 2024, we focused on the new Corporate Sustainability Reporting Directive (CSRD), identifying priority areas through our double materiality assessment (see page 14). We also took a proactive approach to the European AI Act, the EU Accessibility Act, and the EU Digital Decade initiatives, viewing these regulations as valuable guidance for aligning with new reporting standards and advancing our strategy.

Our legal team, in collaboration with external advisors, continuously monitors regulatory developments, including the

EU Digital Decade Initiative and related regulations on platforms, digital services, data protection, cybersecurity, and artificial intelligence. We carefully assess requirements and implement processes to ensure full compliance.

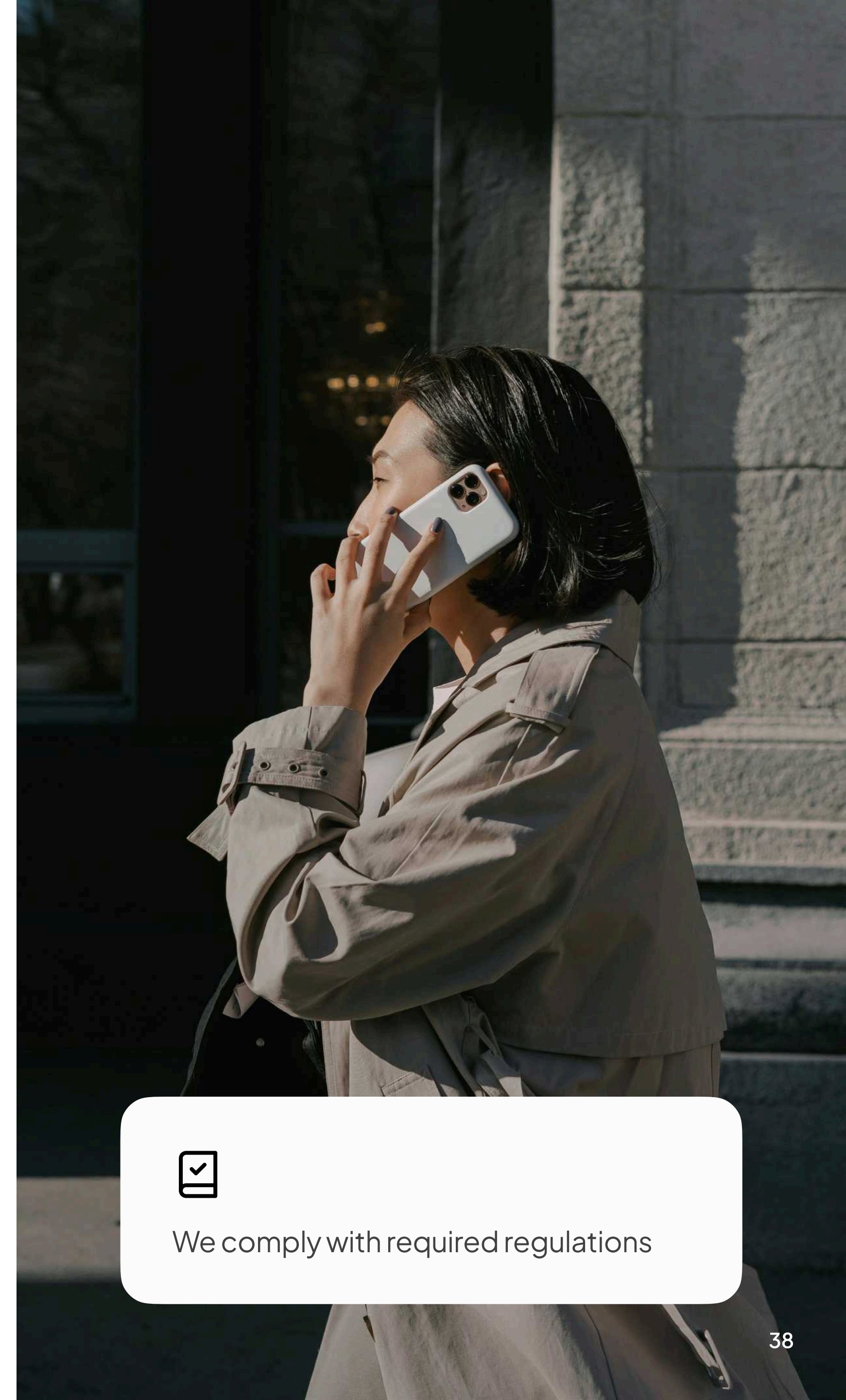
## **Embracing responsible AI practices in our products and operations**

AI is revolutionising technology, and we recognise our role in developing and deploying AI products and services that provide the highest standards of information security, while also acting ethically and responsibly. This includes oversight mechanisms to mitigate risks such as data security breaches, technology misuse, bias, and unfair outcomes, ensuring our AI-powered products are fair and explainable. These mechanisms deliver value to our customers and users while supporting our compliance with the European AI Act, ensuring our solutions meet best-in-class controls and our highest governance standards.

We incorporate these practices into our governance framework to ensure information safety and to promote a sustainable, safe, transparent, and ethical digital future for our customers and users.



We comply with required regulations



# Policies, processes and certifications

Our policies, processes, and certifications ensure we have a robust oversight of information security, anti-corruption, anti-bribery, and anti-money laundering, and that we comply with all relevant laws and regulations.

These areas are integral to fostering sustainable business practices and building trust with our global customer base. Our work in managing these governance topics is detailed in the table below, focused on ensuring compliance, ethical conduct, and the protection of stakeholders.

In 2023 we were proud to sign the UN Global Compact, committing to align our operations with its ten principles on human rights, labour rights, environment, and anti-corruption.

Policy	Scope
<b>ESG</b>	Our groupwide ESG Policy guides sustainability, ethics, and corporate governance. It outlines strategies to integrate ESG principles into decision-making to create long-term stakeholder value.
<b>Whistleblower</b>	group.one provides a secure, confidential whistleblower channel to report unethical behaviour or policy violations without retaliation.
<b>Ethical guidelines</b>	The groupwide guideline outlines the ethical standards expected of all group.one employees
<b>Anti-corruption</b>	This groupwide policy complements our Whistleblower policy, ensuring compliance with local anti-corruption laws in Germany, Austria, and Switzerland. It prohibits bribery, offers guidance on avoiding unethical transactions, and supports reporting violations.
<b>Information security</b>	Our groupwide Information Security Policy ensures data protection, integrity, and confidentiality. It outlines security objectives, risk management, governance roles, and compliance with our security framework.
<b>Security incident</b>	The groupwide Security Incident Policy guides employees in handling data incidents, defining incidents and providing clear response steps to protect operations and sensitive information.

Certification	Scope
<b>National Institute of Standards and Technology (NIST) Cybersecurity Framework</b>	group.one has aligned with NIST framework.
<b>International Organisation for Standardisation / Internal electrotechnical Commission (IEC) 27001:2022<sup>1</sup></b>	Hostnet B.V. and KAMP Netzwerkdienste GmbH achieved relevant ISO/IEC certificate.
<b>ISO 9001:2015 Quality Management System<sup>2</sup></b>	Hostnet B.V. and KAMP Netzwerkdienste GmbH achieved relevant ISO certificate.
<b>ISO/IEC 27018:2019 for information technology, security techniques and code of practice for the protection of personally identifiable information in public clouds<sup>3</sup></b>	KAMP Netzwerkdienste GmbH achieved relevant ISO certificate.
<b>ISO/IEC 27701 Information Security Management System<sup>4</sup></b>	dogado GmbH achieved relevant ISO certificate.
<b>C5 (Cloud Computing Compliance Criteria Catalogue)</b>	dogado GmbH achieved relevant accreditation.

<sup>1</sup> ISO 27001 is an international standard published jointly by the International Organisation for Standardisation (ISO) and the International Electrotechnical Commission (IEC). It's the world's best-known standard for Information Security Management

<sup>2</sup> ISO 9001 is an international management system standard that specifies requirements for a Quality Management System (QMS). Organisations use the standard to demonstrate their ability to consistently provide products and services that meet customer and regulatory requirements, as well as the organisation's own requirements.

<sup>3</sup> ISO/IEC 27018:2019 is a standard for protecting Personally Identifiable Information (PII) in public clouds. It builds on ISO/IEC 27001, providing privacy-specific controls. Certification shows a business's commitment to PII protection, enhances trust, aids compliance, reduces risks, and improves data management.

<sup>4</sup> ISO/IEC 27701 is an international standard specifying requirements for a Privacy Information Management System (PIMS), built upon ISO/IEC 27001.

# Looking to the **future**

Building on this year's progress, we are committed to advancing our sustainability agenda to create a lasting impact for our stakeholders. This section outlines our key initiatives for the coming years, including the enhancement of existing programs and the pursuit of new opportunities across environmental, social, and governance areas.

07



# Our **strategic direction** in each of our focus areas

**As we look ahead, our commitment to sustainability remains a fundamental pillar of our business strategy. In a rapidly evolving digital landscape, we recognise that the expectations of our customers, stakeholders, and regulators continue to grow. We embrace these challenges as opportunities to lead with responsibility.**

We will continue to focus on our three main areas: advancing of our net-zero plan (1), strengthening Inclusion and Belonging (2), and expanding our information security and compliance efforts across brands (3).

We will focus on these areas comprehensively across our established entities.

## **Environmental:** **Advancing Our Net Zero Plan**

Following the roadmap set by our Net Zero Plan, we will drive climate action by deploying our net-zero plan throughout all operations. As a near-term priority, we are accelerating our progress towards the 2030 emissions reduction targets. Our focus remains on expanding the use of renewable energy across all our data centres, optimising infrastructure to reduce energy consumption, and working towards our goal of reaching net-zero emissions by 2040.

Additionally, we will explore innovative solutions, such as AI-driven energy management and partnerships with sustainable technology providers, to further reduce our environmental footprint. Through these initiatives, we aim to demonstrate that environmental leadership and business excellence can advance hand in hand.

## **Social:** **Strengthening Inclusion and Belonging**

Inclusion and Belonging will continue to shape how we grow our business. We will maintain our approach to mirroring our customers' profiles, ensuring that our leadership and teams reflect the founders and SMBs we serve. We believe that when our people grow, the business grows.

As we move forward, we will expand the deployment of our comprehensive People Strategy – i.e. increasing training capacity for our employees, conducting a compensation benchmark, and implementing a global HR management system – putting emphasis on retaining and transitioning the skills of our top talent.

Regarding our I&B plans, we will expand with targeted programmes focused on assessing and addressing gender pay gaps, celebrating our team and our customers, and increasing awareness of the whistleblowing system. These efforts will further foster an inclusive environment by escalating challenges for leadership attention.

## **Governance:** **Strengthening Cybersecurity and Compliance in a Shifting Regulatory Landscape**

Trust will remain at the foundation of our business success as we navigate an increasingly complex digital landscape. Our near-term goals include expanding ISO certifications on information security across our established brands and all future acquisitions and demonstrating our commitment to security by following comprehensive best practice certifications, such as ISO 27001. Through this, we aim to show our customers that we apply best-in-class processes and controls in safely managing and storing their data, regardless of which portfolio company/brand they are aligned with. We will also continue to monitor regulatory advancements such as the AI Act and EU Accessibility Act, while integrating their requirements as a key part of our business strategy.

We recognise the potential changes the EU's Omnibus proposal might bring to our sustainability strategy and reporting requirements. We will remain agile, adapting to alterations as needed to achieve our sustainability and business goals and our compliance commitment.

Looking to the future

# Moving forward as **one**

## Integrating ESG into our M&A processes

To enable a smooth integration of our acquisitions, we will be enhancing our Mergers & Acquisitions strategy, extending ESG assessment areas as part of the due diligence process. While we expand, we will continue to collect excellent examples of sustainability practices across the brands that can be implemented groupwide. We engage early with each new brand integrated into our portfolio, expanding our activities, processes, and KPI tracking to align their sustainability practices with ours.

As we move forward, our mission remains clear: to empower small and medium-sized businesses to succeed in a sustainable, inclusive, and secure digital economy. Through continued innovation, strategic investment, and responsible leadership, we will drive meaningful progress—creating long-term value for our customers, our employees, and the communities we serve.



# Annex

The annexe provides details on the double materiality methodology used for this report, including the scoring matrix and stakeholder engagement.

# Double materiality assessment

## Methodology

The double materiality assessment presents a comprehensive analysis of financial and non-financial aspects of sustainability. This provides valuable insights into our operations and value chain concerning operational risks, opportunities, regulatory changes, and societal developments.

Our double materiality assessment addresses:

### Impact materiality

This evaluates the positive and negative effects of our operations on the environment and society. We focus on identifying where we can mitigate negative impacts and maximise positive contributions.

### Financial materiality

This assesses how sustainability issues influence our financial performance, including potential risks and opportunities that may affect our long-term growth and profitability.

The methodology for the double materiality assessment began with a comprehensive sector review to identify the risks and opportunities relevant to the business. This was followed by a series of interviews with key internal stakeholders across various functions within the company. These included: customer service representatives, to capture customer perspectives; the KAMP team, to provide insights on data centre suppliers; and C-level perspectives including the Chief Transformation Officer, the M&A team, the Chief Commercial Officer, the Chief People Officer, the CEO, and the SaaS COO.

Following these interviews, a shortlist of identified risks and opportunities was compiled. The ESG Director reviewed this shortlist for accuracy and completeness, ensuring all relevant factors were considered. The identified risks and opportunities were then scored based on their potential material impact, with the scoring process being reviewed by the Chief People Officer, CFO, and SaaS COO. To assess material impacts, we evaluated the severity of negative effects, as well as any potential or actual positive impacts. The assessment considered scale, scope, irremediability (for negative impacts), timeframes, and (in the case of potential impacts) the likelihood of occurrence. We also analysed how these effects could evolve over time and their long-term implications for society and the environment, with no deviation from the ESRS pre-set timeframes. This comprehensive evaluation led to the identification of the most relevant sustainability issues from an impact perspective.

In addition to evaluating impact materiality, we also conducted a financial materiality assessment to gain a holistic view of the significance of our sustainability topics. The financial materiality offers a perspective of sustainability issues that could potentially affect, e.g., our financial position, performance, or future development. This assessment included both current financial risks, typically disclosed in our annual report, and potential risks or opportunities that have not yet been recognised in our financial reporting but that could have a substantial impact on our business in the medium and long term. The assessment considered the magnitude of the financial effect in the short, medium, and long term, as well as the potential likelihood of those effects.

# Stakeholder engagement

A key component of the double materiality process is incorporating the perspectives of stakeholders. The views of these stakeholders shape our strategic decision-making process and our double materiality assessment of sustainability-related impacts, risks, and opportunities.

We actively engage employees, customers, suppliers, and investors to ensure that our priorities reflect their views. This inclusive approach involved dialogues with key functions, including:

- Chief Executive Officer
- Chief People Officer
- Chief Commercial Officer
- Chief Operating Officer (SaaS product brands)
- VP of UX Design
- Merger and Acquisitions team
- Technical Managing Directors (KAMP Data Centre)
- Customer Service Representatives

These discussions ensured that all relevant sustainability issues were identified and prioritised in accordance with both internal and external expectations.

## Scoring

See the scoring matrices below for reference.

### Impact Materiality Scoring (5 Point Scale)

Severity of positive / negative impact	Critical (5)	5	10	15	20	25
	High (4)	4	8	12	16	20
	Medium (3)	3	6	9	12	15
	Low (2)	2	4	6	8	10
	Insignificant (1)	1	2	3	4	5
		Unlikely (1)	Not likely (2)	Probable (3)	Highly probable (4)	Almost certain (5)
		Likelihood				

### Financial Materiality Scoring (5 Point Scale)

Size of potential financial effect	Critical (5)	5	10	15	20	25
	High (4)	4	8	12	16	20
	Medium (3)	3	6	9	12	15
	Low (2)	2	4	6	8	10
	Insignificant (1)	1	2	3	4	5
		Unlikely (1)	Not likely (2)	Probable (3)	Highly probable (4)	Almost certain (5)
		Likelihood				

Highly material
  Material
  Non-material

