NORTHERN DATA GROUP

ESG REPORT (UNAUDITED)

A TO THE
   SHAREHOLDERS

B ESG REPORT
   (UNAUDITED)

   Introduction

C GROUP MANAGEMENT
   REPORT

D GROUP FINANCIAL
   STATEMENTS

E NOTES TO THE GROUP
   FINANCIAL STATEMENTS

ESG Report (Unaudited)

Introduction

Sustainability at Northern Data

Sustainability plays a crucial role in high-performance computing (HPC) operations. Northern Data Group's success and long-term value creation relies on the close and responsible collaboration with internal and external stakeholders. Being aware of HPC's energy-intensive demands, the Group works together with its business partners in the supply chain to adopt energy-efficient solutions, such as advanced liquid-cooling systems, to reduce power consumption and minimize its environmental impact. The Group focuses on building and running high-energy efficient data centers and compute infrastructure, integrating renewable and/or carbon neutral energy sources where possible.

In addition to energy use, Northern Data Group focuses on sustainable resource management through waste reduction and strategic data center location choices. These efforts address the growing need to balance technological innovation — like AI and cloud computing — with environmental responsibility.

By embedding sustainability into its operations, Northern Data Group seeks to achieve the highest operational standards while considering the expectations of a range of stakeholders, showcasing how sustainable strategies can bring together technological and societal progress, and business goals.
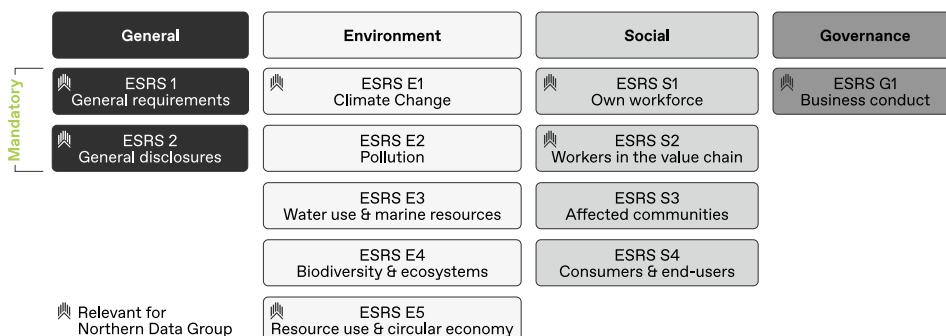
2024 ESG reporting

Transparent and accountable reporting is central to monitoring environmental, social, and governance (ESG) performance. Northern Data Group published its first ESG report in 2021, aligning where possible its reported data with global sustainability standards. As part of its commitment to continuous improvement, the Group is now advancing its reporting to comply with the Corporate Sustainability Reporting Directive (CSRD). By adopting European Sustainability Reporting Standards (ESRS), Northern Data seeks to ensure that its sustainability efforts are adequately managed, measured and communicated.

The CSRD introduces a robust framework for ESG reporting. Established by the EU, it requires companies to disclose their sustainability performance through 10 specific topical standards (Environment E1-E5, Social S1-S4, Governance G1) and two mandatory general standards. Following the new package of proposals published by the European Commission on February 26, 2025, for Northern Data, the CSRD regulation could potentially take effect starting fiscal year 2026. In preparation, the Group has already started to align its reporting to the ESRS standards and is reviewing the new package of proposals relating to the CSRD.

The process started with the undertaking of a double materiality assessment to identify the Group's key sustainability topics. The assessment was carried out by an external third party and addressed both the impact of external sustainability issues on the Group as well as the Group's effect on environment and society. The outcome of the assessment provided a holistic view of where the Group should focus the management and reporting of its ESG activities. Northern Data will continue to enhance its ESG reporting as it moves toward full compliance with ESG regulations.

The European Sustainability Reporting Standards

General	Environment	Social	Governance
ESRS 1 General requirements	ESRS E1 Climate Change	ESRS S1 Own workforce	ESRS G1 Business conduct
ESRS 2 General disclosures	ESRS E2 Pollution	ESRS S2 Workers in the value chain	
	ESRS E3 Water use & marine resources	ESRS S3 Affected communities	
	ESRS E4 Biodiversity & ecosystems	ESRS S4 Consumers & end-users	
	ESRS E5 Resource use & circular economy		

Mandatory (ESRS 1, ESRS 2)

Relevant for Northern Data Group

A TO THE
SHAREHOLDERS
B ESG REPORT
(UNAUDITED)
C GROUP MANAGEMENT
REPORT
D GROUP FINANCIAL
STATEMENTS
E NOTES TO THE GROUP
FINANCIAL STATEMENTS

Group ESG data overview

Group ESG data overview

	Material Topic	Reported Indicator	Figure in 2024	Figure in 2023	Variation
E1	Climate change	Total energy consumption	906 GWh	787 GWh	+15%
		Share of renewable energy (location-based)	53%	–*	-
		Share of nuclear energy (location-based)	8%	–*	-
		Share of fossil fuel energy (location-based)	35%	–*	-
		Share of other/unknown energy sources (location-based)	4%	–*	-
		Power Usage Effectiveness Boden, Sweden Colocation sites	1,12 =/< 1,2	1,09 =/< 1,2	+3% –
S1	Own workforce	Employee headcount as of December 31	199	145	+37%
		Average headcount	177	144	+19%
		Employee turnover (voluntary)	17%	25%	-8pp
		Nb. of employees by gender	Men: 68% Women: 32%	Men: 69% Women: 31%	-1pp +1pp
		Nb. of employees by age	<30: 27% 30-50: 62% >50: 11% n.a.: 1%	<30: 26% 30-50: 62% >50: 12%	+1pp – -1pp +1pp
		Nb. of employees by contract	Permanent: 99% Temporary: 1% Full-time: 95% Part-time: 5%	Permanent: 100% Temporary: 0% Full-time: 92% Part-time: 8%	-1pp +1pp +2pp -2pp
		Nb. of employees by region	EMEA: 70% AMER: 30%	EMEA: 70% AMER: 30%	– –
G1	Governance	Annual compliance training	89%	98%	-1pp
		Reported whistleblowing cases	5	4	+1
		Investigated whistleblowing cases	4	-	+4
		Negligible whistleblowing cases	1	4	-3
Entity Specific (ES)	Cyber security	Known cyber security breaches	-	5	-5

*Information to recalculate the 2023 breakdown was not readily available

A   TO THE SHAREHOLDERS

B   ESG REPORT (UNAUDITED)

C   GROUP MANAGEMENT REPORT

D   GROUP FINANCIAL STATEMENTS

E   NOTES TO THE GROUP FINANCIAL STATEMENTS

General disclosures

General disclosures

General basis of preparation of sustainability statements

Northern Data Group's ESG report has been mostly prepared on a consolidated basis, aligned with the scope of the financial statements including all relevant subsidiaries where possible. The reported energy consumption does not cover 100 percent of the Group's activities. It includes its largest component, which is energy consumption from data centers both owned and colocation sites. The sustainability statement encompasses Northern Data Group's value chain, addressing impacts, risks, and opportunities across key aspects of both upstream and downstream activities. Additionally, it refrains from including any information related to ongoing developments or matters under negotiation.

Value chain

The value chain information in this report, albeit limited, is based on a combination of desk research, direct engagement with value chain stakeholders, and insights from expert opinions.

Sources of estimation and outcome uncertainty

This report may include quantitative metrics and monetary amounts that are subject to a high level of measurement uncertainty. The sources of this uncertainty include limitations in data availability, reliance on estimates, and variability in the methods used for calculation.

As the Group continues to make progress towards compliance with the revised CSRD, assumptions, approximations, and judgments could be made throughout the measurement process to fill in gaps where direct data was unavailable. These factors have been carefully considered, and any related uncertainties have been disclosed to provide transparency throughout the report.

Changes from previous reporting periods

To prepare for the CSRD, Northern Data Group has began to align its reporting with the relevant definitions and requirements outlined in the ESRS. Fiscal year 2023 comparatives have been aligned where necessary and possible to the new definitions included in the ESRS.

Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

The information included in this sustainability statement has been prepared solely in accordance with the ESRS. No other sustainability reporting standards or frameworks have been applied.

A TO THE
   SHAREHOLDERS

B ESG REPORT
   (UNAUDITED)
   Management
   responsibilities

C GROUP MANAGEMENT
   REPORT

D GROUP FINANCIAL
   STATEMENTS

E NOTES TO THE GROUP
   FINANCIAL STATEMENTS

Management responsibilities

Composition

Northern Data's management operates under a two-tier structure, comprising the Management Board and the Supervisory Board. These two bodies function independently, in compliance with the German Stock Corporation Act (AktG). The Management Board serves as the executive body of the AG and is responsible for independently managing the Group's operations. The Management Board is obligated to act in the best interests of the Group.

The Supervisory Board, elected by the shareholders, functions as the oversight body of the AG, monitoring the activities of the Management Board. Additionally, the Supervisory Board has significant approval rights and participates in critical decisions, such as the appointment and dismissal of members of the Management Board.

Number of executive members (Management Board)	1
Number of non-executive members (Supervisory Board)	3

For more information, please refer to the chapter "Report of the Supervisory Board".

Employee representation

There is no employee representative on Northern Data AG's Supervisory Board because the Company employs fewer than 500 individuals. According to German law (§ 1 (1) Drittelbeteiligungsgesetz), employee representation on the Supervisory Board is only required for companies with more than 500 employees.

Experience

The members of the Management Board have the necessary knowledge and experience to properly manage Northern Data's business. The members of the Supervisory Board have the necessary knowledge and experience to properly perform their supervisory duties.

Relevant areas of expertise include all aspects of the data center industry and cloud computing, programming, system design, software engineering, product development and management, as well as expertise in financial and capital markets at the intersection of finance and technology.

Risk oversight

Northern Data attaches great importance to the transparent and responsible management of sustainability issues. The governance structure seeks to ensure that material ESG impacts, risks and opportunities are effectively identified, monitored, and managed.

The Executive Leadership Team is committed to overseeing ESG topics and is actively involved in the development and implementation of governance processes, controls, and procedures necessary to monitor key ESG impacts, risks, and opportunities. Responsibility for the identification and management of any risks, including ESG related risks, lies with each of the internal functions and departments. The Executive Leadership Team relies on regular reporting and analysis to ensure that risks are identified and addressed at an early stage.

Integration of sustainability-related performance in incentive schemes

Northern Data Group currently has no incentive schemes or remuneration policies tied to ESG matters for its administrative, management, or supervisory bodies. As a result, there are no defined characteristics of such schemes, no ESG-related targets or impacts used to evaluate performance, and no consideration of ESG metrics as benchmarks or components of remuneration policies. Similarly, there is no portion of variable remuneration linked to ESG objectives.

A TO THE SHAREHOLDERS

B ESG REPORT (UNAUDITED)
    Strategy, business and value chain

C GROUP MANAGEMENT REPORT

D GROUP FINANCIAL STATEMENTS

E NOTES TO THE GROUP FINANCIAL STATEMENTS

Strategy, business and value chain

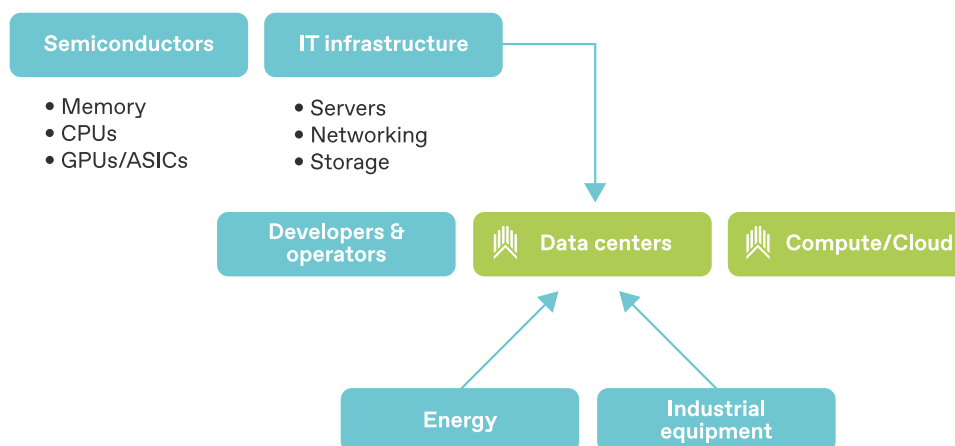## Products and services offered

Detailed information about the Group's products and services is provided in the "Business Model" chapter. Insights into significant markets and key customer groups are outlined in the "Macroeconomic and industry-specific conditions" chapter.

While no specific targets have been set to date, the Group is already integrating certain key sustainability considerations, such as the availability of carbon-neutral energy sources or the energy efficiency of new data centers measured by the Power Usage Effectiveness (PUE), into its operations and strategy. This ongoing work lays the foundation for setting measurable and meaningful sustainability goals in the future, aligned with industry standards and stakeholder expectations.

Value chain

Northern Data Group develops and operates high-performance computing (HPC) and AI solutions. The value chain relies heavily on semiconductors, including GPUs, ASICs, memory, and CPUs, which are essential for powering AI workloads. In addition, IT infrastructure — comprising servers, networking, and storage solutions — forms a critical component of the operational framework. Energy is another foundational input, fueling data center operations, including compute, storage, and cooling systems. Northern Data optimizes environments for compute-intensive AI operations in both its own data centers and third-party sites. This seamless integration across the value chain ensures the delivery of scalable and high-performance AI computing solutions.

Northern Data Group's value chain

A TO THE
   SHAREHOLDERS

B ESG REPORT
   (UNAUDITED)
   Interests and views of
   stakeholders

C GROUP MANAGEMENT
   REPORT

D GROUP FINANCIAL
   STATEMENTS

E NOTES TO THE GROUP
   FINANCIAL STATEMENTS

Interests and views of stakeholders

Stakeholder engagement

Northern Data Group actively engages with stakeholders in order to understand their perspectives, concerns, and expectations. The Group's commitment to stakeholder engagement lies at the heart of its strategy and plays a pivotal role in achieving sustainable long-term success. This collaborative approach ensures that the Group's efforts align closely with stakeholder's priorities, driving continuous progress in performance.

Stakeholders	What they care about	Northern Data's engagement	Examples of outcomes of engagements
Employees	A secure job with career opportunities, flexible working conditions, work-life balance and well-being, benefits and incentives, reward and recognition, working environment, learning and development opportunities, diversity and inclusion	Annual employee survey, quarterly employee appraisals, employee performance appraisal training, introduction of a Well being Calendar, launch of the Employee Assistance Program (EAP), launch of a bi-annual Cross-Team Day to strengthen interdepartmental collaboration	Enhanced understanding of the performance process; increased engagement on well-being activities (over 50% of employees engaging with an initiative of the Well being Calendar); consistently high participation in interactive initiatives; significant uptake of the Employee Assistance Program; strong interest on the upcoming Cross-Team Day
Investors and financial analysts	Group strategy and performance, market dynamics and customers, sustainable growth, timely and transparent financial reporting and communications, technological trends, key sustainability areas such as energy efficiency and consumption, innovation and talent	AGMs, quarterly reporting, earnings calls, capital markets days, ongoing investor engagement, including roadshows and conferences	In addition to a live annual presentation, in 2024 the Group introduced quarterly financial reporting, albeit with limited scope. The Group intends to continue to expand the scope of its quarterly reporting to align with market practice and investors' expectations
Customers	Access to advanced technology, innovation and investment in R&D, customer service levels, project schedules	Regular contact with customers, both existing and potential new customers, customer support and feedback	The Group launched the AI Accelerator to foster innovation and the creation of new AI applications amongst startups, improving own products through customer feedback
Partners, suppliers	Price and agreements, Group strategy, ESG, longstanding cooperation, innovation, and expertise	Supplier due diligence, workshops and collaborative industry initiatives	Close partnerships with companies like Nvidia, AMD, HP Enterprise, Gigabyte, MicroBT, Coinbase, Foundry, Heatpower, Symcore, SBI crypto, Pure Storage, Green IT Solution, Vast
Public stakeholders (media, NGOs, local communities)	Prioritization of transparency, accessibility, and responsible practices, access to accurate information, engagement	Ongoing engagement, including a program of targeted events. Ongoing engagement with local communities, particularly around the development of data centers	In 2024 the Group announced the development of its new data center in Maysville with active engagement of local authorities
Legislator and authorities	Sector-wide issues, such as increasing energy requirements, data sovereignty, data security, geopolitical risks, use of AI technology, regulatory compliance	Public consultations, compliance with regulations	Active engagement with regulators and other bodies on ad hoc basis

A   TO THE
    SHAREHOLDERS

B   ESG REPORT
    (UNAUDITED)

    Materiality

C   GROUP MANAGEMENT
    REPORT

D   GROUP FINANCIAL
    STATEMENTS
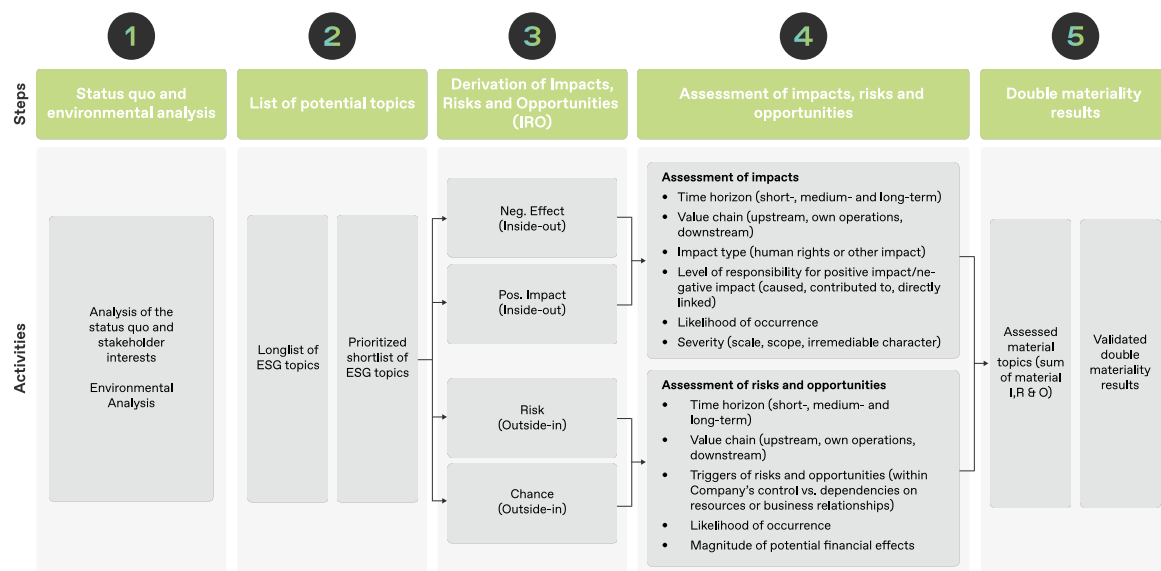
E   NOTES TO THE GROUP
    FINANCIAL STATEMENTS

Materiality

Process to identify and assess material impacts, risks and opportunities

In fiscal year 2024, Northern Data Group undertook its first double materiality analysis, considering both the impacts on society and the environment as well as the financial risks and opportunities to the business.

The double materiality analysis was performed in five consecutive steps. It began with an assessment of the business model and ESG readiness through document reviews, value chain mapping, analysis of policies, competitor data, risk inventory, and stakeholder input (Step 1).

A list of sustainability topics was then created using ESRS 1, AR16, internal guidelines, and frameworks like the Sustainability Accounting Standards Board (SASB) and the Global Reporting Initiative (GRI), refined into a prioritized shortlist aligned with industry standards (Step 2). Impacts, risks, and opportunities (IROs) were identified through detailed analysis and workshops (Step 3), then evaluated by time horizon, value chain stage, responsibility, likelihood, and severity (Step 4). Finally, the results were consolidated to identify material topics, which were validated by stakeholder representatives and management (Step 5).

	1	**2**	**3**	**4**	**5**
Steps	Status quo and environmental analysis	List of potential topics	Derivation of Impacts, Risks and Opportunities (IRO)	Assessment of impacts, risks and opportunities	Double materiality results

Activities

Step 1: Analysis of the status quo and stakeholder interests; Environmental Analysis

Step 2: Longlist of ESG topics; Prioritized shortlist of ESG topics

Step 3:
- Neg. Effect (Inside-out)
- Pos. Impact (Inside-out)
- Risk (Outside-in)
- Chance (Outside-in)

Step 4:

Assessment of impacts
- Time horizon (short-, medium- and long-term)
- Value chain (upstream, own operations, downstream)
- Impact type (human rights or other impact)
- Level of responsibility for positive impact/negative impact (caused, contributed to, directly linked)
- Likelihood of occurrence
- Severity (scale, scope, irremediable character)

Assessment of risks and opportunities
- Time horizon (short-, medium- and long-term)
- Value chain (upstream, own operations, downstream)
- Triggers of risks and opportunities (within Company's control vs. dependencies on resources or business relationships)
- Likelihood of occurrence
- Magnitude of potential financial effects

Step 5: Assessed material topics (sum of material I,R & O); Validated double materiality results

A TO THE
   SHAREHOLDERS

B ESG REPORT
   (UNAUDITED)

C GROUP MANAGEMENT
   REPORT

D GROUP FINANCIAL
   STATEMENTS

E NOTES TO THE GROUP
   FINANCIAL STATEMENTS

Materiality

Identified impacts, risks and opportunities

Northern Data Group's relevant impacts, risks, and opportunities identified through the double materiality assessment align with the following ESRS topical standards:
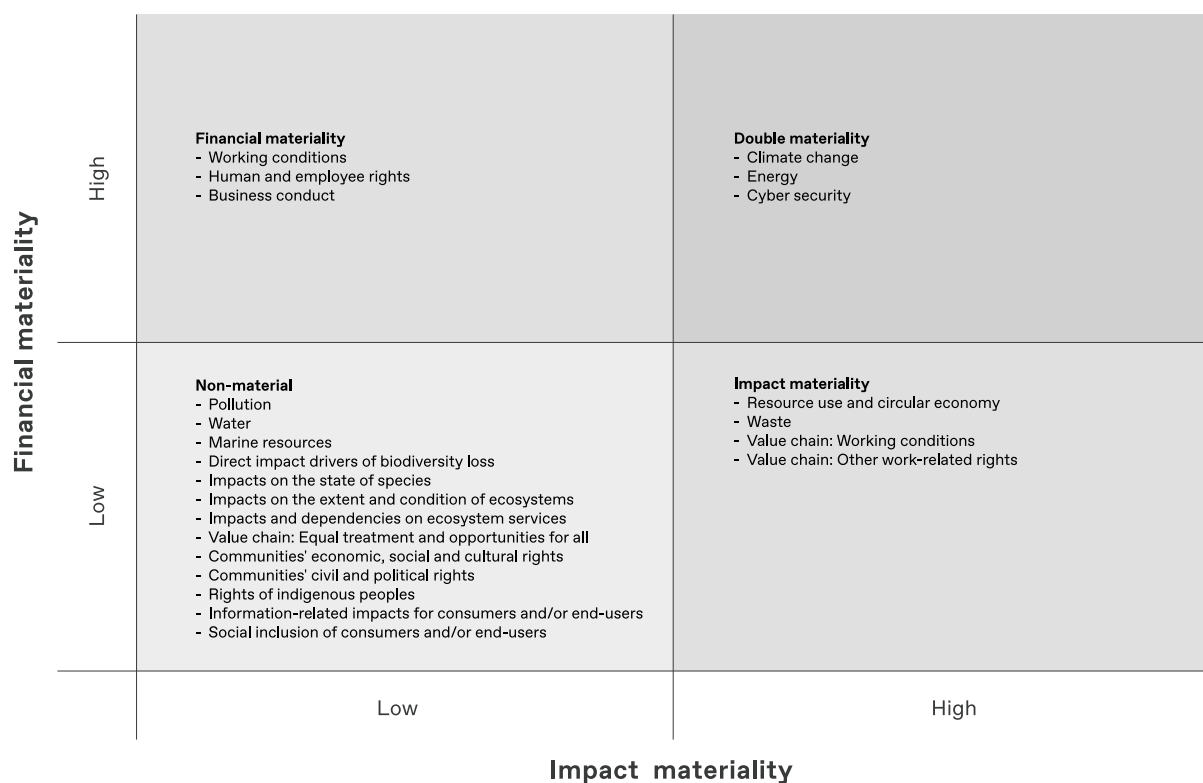
• E1 Climate Change

• E5 Resource Use and Circular Economy

• S1 Own Workforce

• S2 Workers in the Value Chain

• G1 Business Conduct

• Entity-specific standard ES Cyber security

A detailed description of the identified individual impacts, risks, and opportunities is provided in the following chapters under the respective topical standards.

Conversely, the impacts, risks, and opportunities relating to the following ESRS topical standards were deemed non-material:

• E2 Pollution

• E3 Water and Marine Resources

• E4 Biodiversity

• S3 Affected Communities

• S4 Consumers and End Users—were deemed non-material.

Double materiality analysis

Financial materiality

High

Financial materiality
- Working conditions
- Human and employee rights
- Business conduct

Double materiality
- Climate change
- Energy
- Cyber security

Low

Non-material
- Pollution
- Water
- Marine resources
- Direct impact drivers of biodiversity loss
- Impacts on the state of species
- Impacts on the extent and condition of ecosystems
- Impacts and dependencies on ecosystem services
- Value chain: Equal treatment and opportunities for all
- Communities' economic, social and cultural rights
- Communities' civil and political rights
- Rights of indigenous peoples
- Information-related impacts for consumers and/or end-users
- Social inclusion of consumers and/or end-users

Impact materiality
- Resource use and circular economy
- Waste
- Value chain: Working conditions
- Value chain: Other work-related rights

Low   High

Impact materiality

A TO THE
    SHAREHOLDERS

B ESG REPORT
    (UNAUDITED)

    E1 Climate change

C GROUP MANAGEMENT
    REPORT

D GROUP FINANCIAL
    STATEMENTS

E NOTES TO THE GROUP
    FINANCIAL STATEMENTS

E1 Climate change

Material impacts, risks and opportunities

Topic	Description	IROs
Climate change	Own greenhouse gas (GHG) emissions contribute to a rise in the GHG concentration in the atmosphere, leading to changing climate patterns, including droughts, flooding and heatwaves, increase in average temperature and sea level rise. Environmental impacts of climate change lead to destruction of built environment resulting in damage costs and/or increased adaptation costs. Adverse human health effects are caused through droughts and/or flooding leading to spread of diseases, e.g. water-borne diseases, heat-related deaths, and malnutrition due to decreased agricultural output.	Negative impact
Climate change	Upstream and downstream GHG emissions contribute to a rise in the GHG concentration in the atmosphere. This leads to changing climate patterns, including droughts, flooding and heatwaves, increase in average temperature and sea level rise.	Negative impact
Climate change	Changes in customer preferences, i.e. requesting higher environmental standards, leads to changes in demand such as requests for detailed information about products leading to higher costs (due to e.g. implementation of internal structures).	Risk
Climate change	Reporting and compliance readiness in upcoming carbon regulations (e.g. CSRD, CBAM, ETS or/and EU taxonomy) and increasing carbon and energy prices lead to higher costs and penalties.	Risk
Climate change	Due to the increased energy efficiency and low-carbon requirements for companies, there is a growing demand for low-carbon technologies and critical materials which may lead to higher costs and/or supply bottlenecks, endangering production capacity and sales of products.	Risk
Climate change	Frequent and chronic extreme weather events pose a risk to employees, assets, and disruptions in own operations and the supply chain and damage to infrastructure, leading to supply bottlenecks, production disruptions or costs related to repair or replacement, and increased insurance premiums.	Risk
Energy	Increasing the consumption of renewable energy leads to a decrease of own carbon footprint, resulting in reputational advantages and potentially higher sales.	Opportunity
Energy	Sourcing of non-renewable energy sources intensifies environmental pollution and health risks.	Negative impact
Energy	Increased demand for renewable energy consumption drives innovation in clean energy technologies, fostering economic growth and job creation in the renewable energy sector while reducing reliance on finite resources.	Positive impact
Energy	By non-reduction of energy consumption, e.g. from air cooling, Northern Data faces the risk of higher financial burdens resulting from an increase in energy prices.	Risk
Energy	Investment in renewable energy sources could increase diversification in energy supply, foster innovative technologies, and mitigate risks associated with fossil fuels.	Opportunity
Energy	By reducing overall energy consumption by investing in more efficient chips and the adoption of best-in-class cooling technologies, Northern Data can reduce costs.	Opportunity

A   TO THE
    SHAREHOLDERS

B   ESG REPORT
    (UNAUDITED)

C   GROUP MANAGEMENT
    REPORT

D   GROUP FINANCIAL
    STATEMENTS

E   NOTES TO THE GROUP
    FINANCIAL STATEMENTS

E1 Climate change

Climate transition plan

Northern Data acknowledges the importance of addressing climate change and seeks to maximize the use of carbon-free and renewable energy in its operations where possible. Following a period of rapid business transformation and expansion, the Group does not currently have a transition plan in place, as it does not consider its business to be at risk of chronic extreme weather events in the short or medium term. As the Group continues to grow and evolve, it will evaluate the appropriate timing and scope for the development of a transition plan for climate change mitigation and ensure it is embedded in its overall strategy and approved by its governance bodies.

Energy efficiency

Power Usage Effectiveness (PUE) measures how efficiently data centers use electricity to generate computing power. It is the ratio of total energy consumption to the energy used by computing equipment, with an ideal PUE being 1.0. Facility energy consumption includes non-computing elements like cooling and lighting.

In 2024, Northern Data Group calculated a PUE of 1.12 for its Swedish data center, classified as very efficient (values below 1.2 are considered very efficient). Our colocation partners guarantee PUE levels of 1.2 or lower.

Energy consumption and energy mix

Total energy consumption for the Group's data center operations, including contracted third-party data centers, for 2024 was 906 GWh (prior year: 787 GWh). The increase in total energy consumption compared to the previous year can be attributed to an increased number of data center sites required for the deployment of the NVIDIA Tensor Core GPUs. The presented energy mix was estimated following the location-based approach.

Energy consumption by source	2024	% of total
Fossil fuel	318 GWh	35%
Nuclear energy	76 GWh	8%
Renewable energy	476 GWh	53%
Other	36 GWh	4%
Total	**906 GWh**	**100%**

Carbon footprint

Gross Scopes 1, 2, 3 and GHG emissions

Northern Data acknowledges the need to calculate and disclose its greenhouse gas (GHG) emissions across Scopes 1, 2, and where possible, Scope 3. Northern Data Group is seeking to report its Greenhouse Gas emissions in line with the requirements of the simplified CSRD proposal published by the European Commission on 26 February 2025.

In addition, the Group is considering to engage with a third party to calculate its GHG emissions using recognized methodologies and standards. This will serve as a foundation for future action, enabling the company to consider setting reduction targets, implement mitigation measures, and explore opportunities for offsetting residual emissions while adhering to regulatory and quality standards.

Business travel

Northern Data Group is certified to offset 100 percent of the CO_2 from its business travel booked through TravelPerk. The majority of business travel at Northern Data Group is booked through GreenPerk, TravelPerk's carbon-neutral business travel program. GreenPerk partners with carbon calculation and offsetting providers, so that Northern Data Group compensates for its CO_2 emissions directly through the platform. Offsetting is done on a per-trip basis, helping to reduce the carbon footprint of the Company's business travel. All projects are VERRA / GOLD awarded and audited, such as projects to combat deforestation in Indonesia or to aid reforestation in Cambodia.

A TO THE
SHAREHOLDERS

B ESG REPORT
(UNAUDITED)
E5 Resource use and
circular economy

C GROUP MANAGEMENT
REPORT

D GROUP FINANCIAL
STATEMENTS

E NOTES TO THE GROUP
FINANCIAL STATEMENTS

E5 Resource use and circular economy

Material impacts, risks and opportunities

Topic	Description	IROs
Resource use and circular economy	The usage of various raw materials and different components (e.g. rare earth, wood, cooper, etc.) for products, packaging, and manufacturing requires their extraction, which can negatively impact the environment and society, e.g. human rights violations, land degradation, and water consumption/contamination in the value chain.	Negative impact
Resource use and circular economy	The usage of various critical raw materials, which are linked to negative environmental impacts and human rights violations, can result in reputational damages.	Risk
Resource use and circular economy	Resource efficiency in products, packaging, and manufacturing results in less materials extracted, lowering negative environmental and social impacts.	Positive impact
Waste	Insufficient waste management can result in fines or loss of reputation.	Risk
Waste	Improper e-waste management at the end of life of outdated or failed hardware components can have a negative impact on the environment (e.g. through contamination of air, soil and water) and subsequently lead to adverse human health effects (e.g. through contamination of water or agricultural products).	Negative impact

Circular economy

Northern Data Group manages large amounts of hardware. Discarded hardware is managed by deciding whether it can be remarketed, refurbished, recycled, or must be disposed of. The Group's hardware lifecycle program aims to extend the life of end-of-first-lifecycle assets whenever possible, reducing environmental impact and promoting a circular economy. In 2024 discarded hardware (servers, miners, cables, and other equipment) was mostly sold to resellers, Bitcoin mining businesses, and educational institutions.

E-waste

The recycling and disposal of electrical waste is in accordance with local and European laws and guidelines. In 2024 no significant amounts of hardware were disposed of.

A TO THE SHAREHOLDERS   B ESG REPORT (UNAUDITED)   C GROUP MANAGEMENT REPORT   D GROUP FINANCIAL STATEMENTS   E NOTES TO THE GROUP FINANCIAL STATEMENTS

S1 Own workforce

S1 Own workforce

Material impacts, risks and opportunities

Topic	Description	IROs
Work-life balance	Compatibility of work and personal life and prioritizing employee financial and health well-being has positive impacts on e.g. employee health and motivation, which increases productivity (by e.g. reducing accidents and sick days).	Opportunity
Social protection	Provision of social protection for employees against loss of income due to major life events (e.g. sickness, unemployment, employment injury and acquired disability, parental leave, and retirement), leads to increase of employer attractiveness and retention.	Opportunity
Training and skills development	Training and skills development through continuous education and the encouragement of professional and personal development of employees leads to improved human capital, resulting in longer employee retention, higher talent attraction, and improved overall economic performance.	Opportunity
Adequate wages & working time	Guaranteeing decent pay and conditions for workers leads to market differentiation and greater customer appeal.	Opportunity
Health and safety	Insufficient prevention measures (e.g. qualification, personal protective equipment and training of employees) lead to adverse human health effects (e.g. fatalities, workplace illnesses/injuries) resulting in e.g. loss of productive workforce for Northern Data, fines, and reputational effects.	Risk
Gender equality and equal pay for work of equal value	Significant gender equality practices, such as equal pay for equal value, lead to employee engagement and increased attractiveness as a workplace, which result in competitive advantage.	Opportunity
Employment and inclusion of persons with disabilities	Supporting the inclusion of disabled employees and associated office infrastructure leads to an inclusive and equitable work culture where all employees are valued and respected, enhancing overall workplace satisfaction.	Positive impact
Diversity	Enhancing D&I across the workforce leads to an inclusive and equitable work culture where all employees are valued and respected, enhancing overall workplace satisfaction and the general happiness and well-being of employees, which contributes to a healthy standard of living.	Positive impact
Diversity	Enhancing D&I across the workforce leads to e.g. improved (diverse) talent attraction, reducing the impact of a shortage in the labor market and associated shortage risks.	Opportunity

| A | TO THE SHAREHOLDERS | B | ESG REPORT (UNAUDITED) | C | GROUP MANAGEMENT REPORT | D | GROUP FINANCIAL STATEMENTS | E | NOTES TO THE GROUP FINANCIAL STATEMENTS |

S1 Own workforce

Employee characteristics

Northern Data Group collects and manages employee data, using a human capital platform that serves as a centralized hub for storing and organizing employee information.

Nb. of employees in total	2024	2023
Headcount end of year	199	145
Average headcount	177	144
Employee turnover (voluntary leavers only)	17%	25%

Nb. of employees by gender	2024	% of total	2023	% of total
Male	134	67%	100	69%
Female	65	33%	45	31%

Nb. of employees by age	2024	% of total	2023	% of total
<30	53	27%	37	26%
30-50	123	62%	90	62%
>50	21	10%	18	12%
n.a.	2	1%	-	-

Nb. of employees by region	2024	% of total	2023	% of total
Europe	139	70%	101	70%
America	60	30%	44	30%

Nb. of employees by contract type	2024	% of total	2023	% of total
Permanent	198	99%	145	100%
Temporary	1	1%	-	-

Nb. of employees by contract type	2024	% of total	2023	% of total
Full-time	189	95%	134	92%
Part-time	10	5%	11	8%

Reward and recognition

Northern Data Group encourages every employee to fully develop their personal and professional ambitions. To support this, the Group offers competitive salaries, flexible working hours, and professional development opportunities as part of its recognition strategy. Exceptional performance is rewarded through a performance framework, with quarterly reviews that feed into the appraisal process to track progress and determine future goals. A performance based bonus is part of the employee remuneration and is calculated annually.

Work-life balance and well-being

Northern Data Group invests in world-class office spaces and organizes regular social events, end-of-year celebrations, and regional programs tailored to each location.

The Group has a Well-being Calendar designed to foster a healthy, inclusive, and supportive work environment throughout the year. During 2024, new initiatives were introduced each month aimed at promoting physical health, mental wellness, diversity, and community engagement. From insightful interviews on International Women's Day to the energizing Step Challenge, the Group celebrated and supported its employees in various meaningful ways.

Social protection

The Group provides benefits, including pension plans, death-in-service cover, accident insurance, well-being programs, and private medical cover. Northern Data also has a complimentary and confidential Employee Assistance Program available to all employees.

Training and development

The professional and personal development of employees is very important to Northern Data Group. The Group has in place a program of continuous reviews and target-setting cycles as well as a training budget available to each employee. In addition, Northern Data Group offers self-study training courses in a wide range of business and professional topics through an e-learning platform.

Health and safety

Health, Safety, and Environmental management (HSE) involves the planning, implementation, monitoring, and optimization of processes related to the protection of people, property and the environment.

HSE management is a formalized system of policies and procedures designed to help employees stay safe while protecting physical assets and the environment.

A   TO THE
     SHAREHOLDERS

B   ESG REPORT
     (UNAUDITED)

C   GROUP MANAGEMENT
     REPORT

D   GROUP FINANCIAL
     STATEMENTS

E   NOTES TO THE GROUP
     FINANCIAL STATEMENTS

S1 Own workforce

The rules of conduct for a safe workplace and healthy employee interaction are documented in Northern Data Group's Code of Ethics and Conduct. In addition, Northern Data Group has in place a HSE Program that covers key elements of a comprehensive safety plan, including topics such as accident and damage reporting, orderliness and cleanliness, organization of first aid, risk audits, instructions, training and drills, and contractor qualifications.

All incidents at data centers or offices need to be reported to the Health, Safety & Environment Service Desk, which is available to all employees on the intranet.

In addition to the HSE Program, there are Occupational Health and Safety policies for each location that are aligned with applicable local regulations.

Diversity and inclusion

Northern Data actively seeks out different perspectives, increased diversity in decision making, and creates a healthy, supportive, and inclusive work environment where all employees have the opportunity to reach their full potential, feel valued, and be their authentic selves.

The Group has zero tolerance for any type of discrimination on the basis of ethnicity, gender, religion or conviction, disability, age, or sexual identity, or any other characteristics. Northern Data expects all employees to be aware when behavior is unwanted and unwelcome – internally and externally. Employees are encouraged to report any incidents directly to the People team or through any other established mechanisms, such as the Whistleblowing line. The People Team is committed to promptly and thoroughly investigate any complaints and take appropriate follow-up action. In addition, there are regular events and initiatives designed to foster a sense of fairness, equality, and inclusion for all.

Employee engagement and communication

Northern Data has an ongoing program of employee engagement and communication through town halls, newsletters, and other local events with the participation of the senior management team. The Group aims to keep employees updated on its strategic progress, financial results, and other key areas of strategic focus for the business.

In 2024 the Group undertook its first annual employee engagement survey and achieved an engagement score of 78 percent. The feedback from employees was very positive. Amongst some of the positive messages, employees said that they care about the future of the Group and find work interesting and challenging. The survey also identified enhancing work/life balance and communication across teams as two key areas of potential improvement. The People Team has already launched initiatives to address these areas.The results of the annual survey were shared with the leadership and all employees.

The Vice President People, supported by a dedicated Human Resources team, is responsible for the development and application of all relevant policies and activities across the Group.

A   TO THE
    SHAREHOLDERS

B   ESG REPORT
    (UNAUDITED)
    S2 Workers in the
    value chain

C   GROUP MANAGEMENT
    REPORT

D   GROUP FINANCIAL
    STATEMENTS

E   NOTES TO THE GROUP
    FINANCIAL STATEMENTS

S2 Workers in the value chain

Material impacts, risks and opportunities

Topic	Description	IROs
Adequate wages & working time	Violating or lacking rights for workers in the value chain in relation to working time and wages lead to e.g. dissatisfaction in the workforce and adverse health effects causing labor disputes.	Negative impact
Freedom of association, collective bargaining, and social dialogue	Denial of freedom of association/collective bargaining, lacking social dialogue/consultation of workers and/or existence of work councils leads to e.g. violations of human and worker rights and dissatisfaction in the workforce.	Negative impact
Work-life balance	The lack of work-life balance, e.g. insufficient guarantee of flexible working time models, can lead to mental health issues such as burn-out.	Negative impact
Health and safety	Insufficient prevention measures regarding accident prevention and safety (e.g. qualification, personal protective equipment, and training of employees) lead to adverse human health effects (e.g. fatalities, workplace illnesses/injuries caused by manufacturing activities).	Negative impact
Gender equality and equal pay for work of equal value	Significant gender inequality, such as pay discrimination, is a violation of basic human rights.	Negative impact
Discrimination	Discrimination (e.g. based on gender, religion, belonging to a minority) and violence are a violation of basic human rights.	Negative impact
Child labor	Child labor is a violation of basic human rights, leading to e.g. loss of education, resulting in reduced income in later life.	Negative impact
Forced labor	Many digital components require minerals such as tantalum, tin, tungsten, and gold, often sourced from conflict zones where human rights abuses are prevalent.	Negative impact
Other work-related rights	Violation of other work-related rights (e.g. inadequate housing, lack of clean water, and violations of privacy) lead to e.g. dissatisfaction in the value chain workforce and adverse health effects (due to mental stress).	Negative impact

A TO THE
   SHAREHOLDERS

B ESG REPORT
   (UNAUDITED)

   S2 Workers in the
   value chain

C GROUP MANAGEMENT
   REPORT

D GROUP FINANCIAL
   STATEMENTS

E NOTES TO THE GROUP
   FINANCIAL STATEMENTS

Human rights

Northern Data Group's approach to respecting and complying with human rights is set out in its Human Rights Policy. The policy is based on the international human rights principles contained in the Universal Declaration of Human Rights, the International Labor Organization (ILO) Declaration, the Fundamental Principles and Rights at Work, the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights. It applies throughout the Group and covers the topics of anti-discrimination, freedom of association and collective bargaining, a safe and healthy workplace, forced labor, human trafficking, child labor, and working hours.

Supplier code of conduct

Northern Data Group is committed to upholding the highest standards of ethical conduct, environmental sustainability, and social responsibility across its global operations. As a leader in cloud services, data center solutions, and the crypto mining industry, the Group recognizes the critical role its suppliers play in achieving these objectives.

The Supplier Code of Conduct outlines the expectations the Group has for its suppliers, vendors, contractors, and other partners. It reflects the Group's dedication to ensuring that its supply chain operates in alignment with the following values: respect for human rights, protection of the environment, and commitment to fair and transparent business practices.

The Group's Supplier Code of Conduct mandates that suppliers respect human and labor rights, maintain a safe and healthy work environment free from discrimination, and treat all workers with dignity and respect. In instances of human rights violations, Northern Data expect suppliers to provide access to remedy.

The Global Procurement team is responsible for ensuring that all suppliers are aware of the Group's Supplier Code of Conduct.

A TO THE
   SHAREHOLDERS

B ESG REPORT
   (UNAUDITED)

C GROUP MANAGEMENT
   REPORT

D GROUP FINANCIAL
   STATEMENTS

E NOTES TO THE GROUP
   FINANCIAL STATEMENTS

G1 Business conduct

G1 Business conduct

Material impacts, risks and opportunities

Topic	Description	IROs
Business Conduct	A good corporate culture can lead to a good reputation, which attracts and retains talent.	Opportunity
Business Conduct	Non-compliance with MiCA (Markets in Crypto-Assets) regulation can lead to fines, legal proceedings, reputational and regulatory risks.	Risk
Business Conduct	Non-compliance with existing and upcoming regulations (CSRD, CS3D, employee regulations, data center regulations), laws, and tariffs lead to reputational and regulatory risks.	Risk

Code of business conduct & ethics

Northern Data Group demonstrates its commitment to the highest standards of business conduct and corporate ethics through robust governance and policies. The "Code of Business Conduct & Ethics," (the Code) applies to all employees, suppliers, customers, and partners. The Code outlines essential principles covering health and safety, equality, anti-discrimination, conflicts of interest, confidentiality of information, intellectual property, competition and anti-trust, risk management, anti-money laundering, and insider trading.

The Code is prominently accessible via the Group's intranet and is available in German, English, and French. To foster compliance and understanding, all employees undergo mandatory training on the Code and formally confirm their agreement and adherence. Additionally, Northern Data Group actively promotes its corporate culture by embedding ethical values across its operations and regularly evaluating their effectiveness through employee feedback and management reviews.

Mechanisms for identifying, reporting, and investigating concerns about potential violations or unlawful behavior are in place, ensuring confidentiality and accessibility for all stakeholders, including external parties. These mechanisms are designed to uphold integrity and support a transparent, values-driven corporate environment.

Compliance training

The Group has in place an annual Compliance Training program covering a range of topics such as occupational Health & Safety, information security, and insider trading. The program is reviewed annually and includes additional minimum compliance training requirements for new joiners. In 2024, 89 percent of employees completed the training (2023: 98 percent). The Group is targeting a 95 percent completion rate in 2025.

Anti-bribery & corruption and whistleblowing

Northern Data Group is committed to upholding the highest standards of ethical conduct and integrity across all aspects of its business.

The Anti-Bribery and Anti-Corruption Policy outlines a commitment to ethical conduct by prohibiting bribery, corruption, and unethical business practices, ensuring compliance with legal standards and promoting transparency in all interactions.

This Anti-Bribery and Anti-Corruption Policy applies to all employees from Northern Data AG and its subsidiaries, affiliates, and operations of Northern Data globally, ensuring that ethical practices are consistently upheld regardless of location or local customs.

Additionally, the Policy is designed to ensure that third parties understand and adhere to their obligations in preventing bribery and corruption.

| A | TO THE SHAREHOLDERS | B | ESG REPORT (UNAUDITED) | C | GROUP MANAGEMENT REPORT | D | GROUP FINANCIAL STATEMENTS | E | NOTES TO THE GROUP FINANCIAL STATEMENTS |

G1 Business conduct

Northern Data does not contribute to political parties, organizations, candidates, or individuals involved in political activities.

Any payment, contribution, or participation - whether direct or indirect - in political activities for any unauthorized or unlawful purpose is strictly prohibited.

All employees are obligated to promptly report any risks or incidents - whether within or outside the Group - that could potentially harm individuals or entities. This duty extends to reporting violations of the Anti-Bribery and Anti-Corruption Policy, the Code of Business Conduct & Ethics, and any other relevant regulations. In addition, all suppliers, contractors, customers, and external stakeholders are encouraged to report any suspected violations either to their designated Northern Data contact or through the Whistleblowing channel. To support this, Northern Data provides a secure and confidential Whistleblowing System that enables both employees and third parties to report any concerns. The system allows for anonymous submissions, ensuring that individuals can raise concerns about compliance, policy breaches, or other risks without fear. Reports can be made anonymously via the Whistleblowing System or, if preferred, non-anonymously by emailing compliance@northerndata.de.

Northern Data ensures that all reports submitted through the Whistleblowing System are handled with the utmost confidentiality. Furthermore, it is guaranteed that no retaliation will be taken against anyone who reports concerns in good faith, reinforcing our commitment to maintaining a culture of integrity, transparency, and trust throughout the organization.

	2024	2023
Reported whistleblowing cases	5	4
Investigated whistleblowing cases	4	-
Negligible whistleblowing cases	1	4

The Chief Legal Officer is responsible for all compliance matters supported by the Head of Risk and Compliance and a dedicated Legal team.

A TO THE
   SHAREHOLDERS

B ESG REPORT
   (UNAUDITED)

C GROUP MANAGEMENT
   REPORT

D GROUP FINANCIAL
   STATEMENTS

E NOTES TO THE GROUP
   FINANCIAL STATEMENTS

ES Cyber Security

ES Cyber security

Material impacts, risks and opportunities

Topic	Description	IROs
Cyber security	New technologies can introduce new security vulnerabilities and attack vectors, resulting in unavailability of services for customers and loss of private data.	Negative impact
Cyber security	The use of new technologies such as Artificial Intelligence (AI) and machine learning can improve threat detection and defense, which increases data security for customers.	Positive impact
Cyber security	The loss of sensitive information can lead to financial losses, reputational damage, and legal consequences, impacting stakeholder trust and company valuation.	Risk
Cyber security	Cyber attacks, such as ransomware that encrypts critical data and demands ransom, can disrupt operations, lead to significant financial losses, and damage reputation.	Risk

ISO 27001

Northern Data Group is certified for ISO 27001 and has established robust information security policies and processes to manage its material impacts, risks, and opportunities related to cyber security. These policies encompass critical areas such as information security risk management, vulnerability management, data security management, threat modeling, security monitoring, log management, and incident response management, ensuring a comprehensive approach to safeguarding digital assets and mitigating cyber risks.

Actions

Northern Data Group is actively working on implementing actions to enhance its cyber security posture. This includes ongoing efforts to automate critical cyber security processes through the deployment of advanced solutions such as Web Application Firewalls (WAF), Security Information and Event Management (SIEM) systems, Network Detection and Response (NDR), and comprehensive vulnerability management tools. Simultaneously, the Group is expanding its Cyber Security department to support the implementation of these and other required security controls, ensuring alignment with Northern Data Group's growth and operational needs.

Data protection and information security training for employees is covered by the annual compliance training program.

The Head of Group IT, assisted by the Cyber Security team, is responsible for the development and implementation of all related policies and activities.

Targets related cyber security

Northern Data has established clear targets to strengthen its information security framework. These include conducting one internal audit and one external audit annually. The primary goal of these audits is to identify, mitigate, and address information security risks and non-conformities while also incorporating improvement suggestions identified during the audit process. This approach ensures continuous enhancement of the company's security posture, aligning with its commitment to robust risk management and operational excellence.

Cyber security breaches

	2024	2023
Known cyber security breaches	-	5