CloudFerro

ESG REPORT · 2025

Sustainability Report 2025

CloudFerro SA – Voluntary report prepared in accordance with Draft ESRS LSME (EFRAG, February 2025)

REPORTING PERIOD

1 January 2025 – 31 December 2025

SCOPE

Individual report – CloudFerro SA

PUBLICATION DATE

September 2026

100%
electricity from renewable energy sources across all data centres (2025)

317
people in the CloudFerro team at the end of 2025

55 pts
EcoVadis rating - Committed level (July 2025)

0
cybersecurity incidents, GDPR breaches and workplace accidents in 2025

1.18
lowest PUE of data centre infrastructure

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Letter from the President of the Management Board



Dear Ladies and Gentlemen,

we are pleased to present CloudFerro's first ESG report. It reflects our approach to responsible, transparent and long-term business conduct.

We operate in a world where climate change, growing stakeholder expectations and the rapid development of digital technologies are presenting organisations with new challenges. As a company providing cloud infrastructure and solutions supporting large-scale data processing, we are aware both of the impact of our operations on the environment, as well as the responsibility associated with the development and use of technology.

At the same time, we recognise how significant role digital technologies can play in better understanding the processes taking place on our planet. CloudFerro supports projects related to Earth Observation, climate research and environmental data processing, working with public, scientific and technology institutions across Europe.

At the same time, we are consistently working to reduce the impact of our own operations on the environment. We focus primarily on improving the energy efficiency of our infrastructure, responsible resource management, and the development of transparent and accountable governance standards. We regard these actions as an integral part of CloudFerro's development and building a resilient organisation for the future.

This report marks an important step for us in further structuring our ESG activities and building transparent communication with our clients, partners, coworkers and investors. We do not regard sustainability as a separate area of activity, but rather as an element of responsible management, that should be reflected in business, technological and operational decisions.

I would like to thank everyone involved in preparing this report, as well as those who contribute every day to developing responsible practices in ESG at CloudFerro.

Yours sincerely,

Maciej Krzyżanowski

President of the Management Board, CloudFerro SA

Methodology and basis for preparation of the report

Company name	CloudFerro SA
Reporting period	1 January 2025 – 31 December 2025
Report approval date	September 2026
Scope of the report	Individual report – CloudFerro SA only
Reporting standard	Draft ESRS LSME (EFRAG, February 2025) – standard currently undergoing the EU legislative process
Nature of the report	Voluntary – CloudFerro SA's first ESG report
Comparative data	None – first year of reporting (transitional provision, Section 1, paragraph 127)
NACE code	63.11.1 – Data processing, hosting, application services and other IT infrastructure provisioning services
EcoVadis rating	55 points / Committed level (July 2025)



1. Basis for preparation

We are pleased to present CloudFerro SA's first sustainability report, prepared voluntarily on the basis of the Draft European Sustainability Reporting Standard for Listed SMEs (Draft ESRS LSME), developed by EFRAG and published in February 2025. The standard is currently at the stage of the European Union's legislative process; nonetheless, it is the only available reference document for this standard, and is used by companies reporting voluntarily across the EU. The report applies the principle of proportionality inherent to the ESRS LSME standard, adjusting the scope and level of detail of disclosures to the scale and nature of the company's operations.

The choice of the ESRS LSME standard reflects our aim to report on sustainability in a systematic and structured manner, appropriate to the scale and nature of CloudFerro SA's operations.

The report covers only the operations of CloudFerro SA (individual report). Urbetho CF GmbH, in which CloudFerro SA holds an indirect stake through CF Capital, is not covered by this report and is treated as a related entity in the value chain.

The reporting period covers the 2025 financial year (1 January – 31 December 2025), consistent with the financial year adopted for CloudFerro SA's financial statements.

Transitional provision (Section 1, paragraph 127): In the first year of preparing a sustainability report, a company is not required to disclose comparative data for the previous period. CloudFerro SA makes partial use of this provision – where data for 2024 are available, they have been included in the report.

2. Scope and boundaries of the report

The scope of the report was determined on the basis of the results of the Double Materiality Assessment (DMA), carried out between October 2024 and March 2025 and approved by the Management Board in April 2025, together with the due diligence process, both described in Sections 4 and 2.4 of this report. The assessment covered CloudFerro SA's operations across the entire value chain – both the upstream (including suppliers of infrastructure, equipment and services) and downstream (cloud services provided and users of CloudFerro platforms) areas.

The report covers all locations in which CloudFerro SA conducts operational activities, including data centres located in Poland (Warsaw DC1, DC2 and Łódź) and in Europe (Frankfurt, Bologna, Kajaani, Barcelona, Darmstadt), as well as the company's offices in Warsaw.

3. Topics covered by the report and transitional provisions applied

The thematic scope of the report is based directly on the results of the DMA. The full list of disclosure requirements covered by the report is presented in Appendix A (Table IR-2).

Material topics covered by the report and voluntary disclosures:

Standard	ESG topic	Disclosure scope	Status
ESRS E1	Climate change	Energy, GHG emissions Scope 1/2/3, energy efficiency	**Material topic**
ESRS E2	Pollution	F-gases and refrigerants – data from KOBiZE	**Voluntary**
ESRS E3	Water resources	Air cooling at all locations – process water consumption = 0 m^3	**Voluntary**
ESRS E4	Biodiversity and ecosystems	DC locations outside protected areas (Natura 2000, KBA)	**Material topic**
ESRS E5	Waste management	Monitored and reported despite no obligation to do so – in the interest of transparency	**Voluntary**
ESRS S1	Own workforce	Employment, remuneration, training, occupational health and safety, diversity	**Material topic**
ESRS S4	Consumers and end-users	Data protection (GDPR), access to satellite data (STAC)	**Material topic**
ESRS G1	Business conduct	Ethics, cybersecurity, supply chain, transparency	**Material topic**

Transitional provisions applied (phase-in):

As a company preparing its first sustainability report and employing fewer than 500 people, CloudFerro SA makes use of the following transitional provisions (Appendix C, ESRS LSME):

Legal basis	Scope of omission	Explanation
Paragraph 127 Section 1	Partial lack of comparative data for 2024	Applies to part of the quantitative disclosures. Where data for 2024 are available, they have been included in the report.
Phase-in 3 for E6	Financial effects of environmental risks (E6)	In the first three reporting years, disclosure is limited to a qualitative description. Quantitative data will be included in the report for 2028.
Phase-in 2 for S1-6	Training metrics (S1-6) broken down by gender	The breakdown of training hours by gender has been omitted in the first two reporting years. The data will be disclosed in the report for 2027.

Legal basis	Scope of omission	Explanation
Phase-in 1 (partial) for S1-7	Selected health and safety (OHS) indicators for B2B coworkers/contractors	Health and safety data for non-employees have been omitted in the first reporting year.
Phase-in 2 (<500 employees)	Workers in the value chain and affected communities (S2, S3)	Topics outside the scope of ESRS LSME for companies with fewer than 500 employees in the first two reporting years. They were also not identified as material in the DMA.

4. Approach to measurement, estimation and data uncertainty

Greenhouse gas emissions data have been calculated in accordance with the GHG Protocol methodology. Detailed information on emission factors and the calculation methodology is provided in Appendix B. Electricity consumption data are sourced from meters for all locations except the data centre in Frankfurt (NTT FRA1), where the data are based on invoices. Data for CloudFerro SA's offices are sourced from meters.

Greenhouse gas emissions were calculated using the Envirly platform, certified by TÜV NORD as compliant with the GHG Protocol and ISO 14064-1. The dominant Scope 3 category is capital goods (fixed assets) – 18,065 tCO2eq, accounting for 93.7% of total emissions. This reflects the specific nature of CloudFerro's business: intensive investment in server infrastructure generates high embedded emissions in purchased equipment. The remaining Scope 3 categories are purchased goods and services (548 tCO2eq), coworkers commuting (138 tCO2eq), business travel (80 tCO2eq) and waste (8 tCO2eq). Data on coworkers commuting were collected through a voluntary survey completed by 35% of coworkers. The results are presented without extrapolation to the entire workforce. Data on F-gases and refrigerants (Scope 1, 387 tCO2eq) are sourced from reports submitted to KOBiZE. Coworkers data are based on CloudFerro SA's HR records as of 31 December 2025.

5. Verification and external assessments

This report has not been subject to external verification or assurance. The data and information contained in it have been subject to an internal review process by the ESG Committee and approved by the Management Board of CloudFerro SA.

In July 2025, CloudFerro SA achieved an EcoVadis rating of 55 points (Committed level). EcoVadis is a global platform that assesses companies on their commitment to sustainable development across four areas: environment, labour and human rights, ethics, and sustainable procurement. A score of 55 points places CloudFerro SA among companies actively implementing ESG practices. In line with CloudFerro SA's ESG Strategy for 2025–2027, the company plans to systematically increase its EcoVadis score by 5–10% year on year.

CHAPTER 01

About CloudFerro



1.1 Company profile

We are a European technology company headquartered in Warsaw, specialising in the provision of cloud computing services and big data processing solutions. Since our founding in 2015, we have been developing our own cloud infrastructure across European data centres, supporting clients from sectors that require high-performance, secure and reliable IT systems.

A particularly important area of our business is Earth observation and satellite data processing – a field in which we are one of the key infrastructure providers in Europe. CloudFerro's platforms enable scientists, public institutions and commercial companies to work with multi-petabyte repositories of satellite data in real time, supporting projects in environmental monitoring, climate research, agriculture and crisis management.

We build cloud environments based on open-source technologies, providing our clients with flexibility, transparency and compliance with European data protection standards. From the perspective of our business partners, CloudFerro is a stable and predictable service provider – a team that can respond quickly to changing project and technological requirements.

Company name	CloudFerro SA
Year founded	2015
Registered office	Warsaw, Poland (head office: ul. Fabryczna 5; warehouse: ul. Karczunkowska 42)
NACE code	63.11.1 – Data processing, hosting, application services and other IT infrastructure provisioning services
Legal form	Joint-stock company (SA)
Sales revenue 2025	PLN 174,336,354
Balance sheet total as of 31.12.2025	PLN 279,469,188
Number of permanent coworkers by country of operation:	Poland – 317 people

1.2 Nature of operations

CloudFerro's business model is based on providing advanced cloud infrastructure services and data processing platforms for clients running projects that require high availability, security and scalability of IT environments. We provide not only technological resources but also the expertise of engineering teams that support clients in designing, implementing and maintaining IT solutions.

An important element of our business is long-term cooperation with institutional, scientific and commercial clients running large-scale projects with high operational requirements. This approach enables us to build partnership relationships in which technological infrastructure evolves alongside users' needs.

We develop our business on the basis of European technological infrastructure and European data jurisdiction, which is particularly important to clients operating in regulated sectors or running projects that require a high level of security and data protection. At the same time, we provide operational flexibility and the ability to scale services in response to clients' changing needs.

1.3 Value chain

CloudFerro's operations span three areas of the value chain: the supply of raw materials and components (upstream), the company's own operational processes, and the provision of services to clients (downstream). The table below presents the main elements of CloudFerro SA's value chain, which formed the starting point for the Double Materiality Assessment carried out in 2024/2025.

UPSTREAM			PROCESSES AT CLOUDFERRO		DOWNSTREAM	
SUPPLIES						
Supply of raw materials	**Supply of components / equipment**	**Supply of services**	**Core processes**	**Support processes**	**Services**	**Waste**
• **Vehicle fuel** • **Electricity** • **Heat energy** • **Water**	• Server components (chassis, motherboards, drives, processors, memory, network cards, cooling) • Laptops • Monitors • Office and warehouse equipment	• Server rooms (DC) • Subcontractors on projects • Software / applications • Internet access • Advisory services • Certifications • Training • Leasing	• Sales and implementation of new services • Project management • Handling of clients requests • System administration / service delivery	• Marketing • HR • Procurement • Management of physical infrastructure (DC / servers)	• Server-based cloud services • EO platforms (CDSE, CREODIAS, WEkEO) • Urbetho CF GmbH – a related entity representing CloudFerro on the German market (DACH); CF Capital holds a 60% stake	• Equipment packaging waste • Office waste • Waste equipment (e-waste / WEEE)

Source: CloudFerro SA Double Materiality Assessment 2024/2025 (version 1.0.35, approved on 14 April 2025). The table forms the basis for identifying areas of ESG risks and impacts within the company's value chain.

1.4 Main services

Cloud data processing services

CloudFerro's core business is cloud data processing services, comprising the provision of computing resources, storage space and networking tools on an as-a-service basis. These solutions enable organisations to rapidly deploy IT environments and process large volumes of data without the need to invest in their own hardware infrastructure. Thanks to the high performance and reliability of the cloud platform, users can carry out projects that require intensive computation, high system availability and continuous data processing.

Earth observation data platforms

The second key area is Earth observation (EO) data platforms, which integrate cloud infrastructure with tools for analysing and processing satellite data. These platforms allow users to work directly on the data within the cloud environment, which significantly shortens project delivery times and increases resource efficiency, thereby reducing the need to transfer and locally process large datasets.

The key platforms operated by CloudFerro include **CREODIAS**, **WEkEO** and **Copernicus Data Space Ecosystem (CDSE)** – platforms supporting access to satellite data from the Copernicus programme and other European Earth observation missions. Copernicus data are publicly available and free of charge, CloudFerro provides the infrastructure and computing environment necessary for their efficient processing and analysis.

1.5 Key clients and markets

We provide services to clients from the public, scientific and commercial sectors, mainly within the European Union. We are one of the leading companies in the space sector in Poland and Europe, providing platforms that offer access to satellite data together with cloud infrastructure.

CloudFerro's key institutional clients include:

- **ESA** – European Space Agency
- **ECMWF** – European Centre for Medium-Range Weather Forecasts
- **EUMETSAT** – European Organisation for the Exploitation of Meteorological Satellites
- **DLR** – German Aerospace Center
- **POLSA** – Polish Space Agency

Our clients also include research institutes and universities that use CloudFerro's infrastructure for scientific and R&D projects and Earth observation data initiatives. Services are delivered both in the role of main contractor and as part of consortia with other European entities.

1.6 Infrastructure and locations

We conduct our operations on the basis of a network of data centres located across Europe, ensuring high service availability and compliance with European security and data protection standards. The Company operates data centres leased from external operators under a colocation model; in the Łódź location, CloudFerro is the investor in its own data centre infrastructure, leasing the premises only.

Data centers:

Location	Data centre / Operator	Country	Type
Warsaw	Atman	Poland	Data centre
Warsaw Piękna Str	T-Mobile	Poland	Data centre
Warsaw Jawczyce	Netia	Poland	Data centre
Warsaw Łazy	Orange	Poland	Data centre
Łódź	CloudFerro Data Center	Poland	Data centre
Frankfurt	NTT	Germany	Data centre
Bologna	Cineca	Italy	Data centre
Kajaani	CSC	Finland	Data centre
Barcelona	Adam DC	Spain	Data centre

Location	Data centre / Operator	Country	Type
Frascati / Rome	ESA	Italy	Data centre
Darmstadt	EUMETSAT	Germany	Data centre

Office and warehouse:

City	Street	Country	Type
Warsaw	Fabryczna	Poland	Main office
Warsaw	Karczunkowska	Poland	Warehouse + LAB

1.7 Team

Our success is underpinned by a team of highly qualified specialists in software engineering, systems administration, data analysis and technology project management. We consistently invest in developing our coworkers' competencies and in building a working environment that fosters collaboration and innovation – an organisational culture based on knowledge-sharing, accountability for service quality, and engagement in projects that deliver real value to our clients.

In recent years, CloudFerro has dynamically scaled up its operations and workforce, in response to growing demand for cloud services and data processing in Europe. It is precisely the competencies and commitment of our coworkers that constitute one of the most important foundations for our continued growth.

Indicator	31 December 2024	31 December 2025
Number of full-time employees (CloudFerro SA)	114	142
Number of B2B coworkers/ coworkers under mandate contracts	158	175
Proportion of women among full-time employees	37 women (32%) 77 men (68%)	46 women (32%) 96 men (68%)
Proportion of women among B2B coworkers/ coworkers under mandate contracts	19 women (12%) 139 men (88%)	20 women (11%) 155 men (89%)
Proportion of women in management positions	10 women (33%) 20 men (67%)	11 women (29%) 27 men (71%)
Main locations	Warsaw, Poland (head office: ul. Fabryczna 5; warehouse: ul. Karczunkowska 42)	Warsaw, Poland (head office: ul. Fabryczna 5; warehouse: ul. Karczunkowska 42)

The full S1-1 disclosure is provided in Section 6.1 of this report.

CHAPTER 02

Sustainability management



2.1 ESG governance structure

We manage sustainability matters within the company's existing organisational structure, as an integral part of ongoing operational activities and management processes. Responsibility for coordinating ESG-related activities has been entrusted to the ESG Specialist, who operates within the Quality Department in the Operations area. Positioning this function within the operational structure enables sustainability activities to be directly linked to the quality and operational processes carried out across the organisation.

To ensure a consistent approach to managing ESG issues, we have established an ESG Committee, which serves as a forum for cooperation between the organisation's key functional areas. The Committee comprises the ESG Specialist, a representative of the HR Department, and the Quality Specialist. The Committee supports the coordination of ESG activities, the exchange of information between departments, and the identification of areas requiring further development.

The Management Board and the Supervisory Board secure access to specialist ESG expertise through the ESG Committee operating within the company's operational structure, through cooperation with external ESG experts on key processes such as the Double Materiality Assessment, and through the advice of the ESG Director of Innova Capital, the fund that exercises ownership oversight of CloudFerro SA.

ESG oversight body	Management Board of CloudFerro SA
Reporting to the Supervisory Board	Twice a year
Operational body	ESG Committee
Composition of the ESG Committee	ESG Specialist, HR representative, Quality Specialist
Frequency of Committee meetings	Weekly

2.2 Role of the Management Board and Supervisory Board

The Management Board of CloudFerro SA exercises oversight of sustainability matters within the scope of its management competencies and its responsibility for the company's individual business areas. Sustainability policies are approved by the relevant Management Board members in accordance with their assigned areas of responsibility.

ESG matters are addressed at every meeting of the Supervisory Board, which meets once a quarter. Twice a year, ESG is a formal item on the meeting agenda. During these meetings, the ESG Committee presents the Supervisory Board with progress in achieving the objectives of the ESG Strategy, the results of the risk analysis, and key environmental and social indicators.

2.3 Operational responsibility for ESG

Operational responsibility for implementing sustainability activities rests with the ESG Specialist, who reports to the person responsible for the Quality area. This function is responsible for the ongoing coordination of ESG activities and cooperation with other organisational units of the company.

Coordination of activities takes place within the work of the ESG Committee, which meets once a week. The Committee's regular responsibilities include:

- monitoring ESG indicators and analysing progress in achieving strategic targets,
- preparing sustainability reports,
- reviewing ESG risks and updating the Double Materiality Assessment,
- coordinating activities between departments.

The company maintains a dedicated 'Sustainability' section on its intranet, where information on ESG activities, applicable policies and procedures, and selected environmental indicators are made available. This information is updated at least once a year.

CloudFerro carries out regular reporting of environmental data, in particular greenhouse gas emissions and waste management, including through annual carbon footprint reports prepared using the Envirly platform and reports required by the BDO and KOBiZE systems.

2.4 Sustainability due diligence

CloudFerro has implemented a due diligence process for sustainability matters. This process involves the systematic identification, assessment and management of the actual and potential negative impacts of the company's operations on the environment and society, as well as the risks and opportunities arising from ESG factors for the company itself. The process is embedded within CloudFerro's management structures and comprises four main elements.

Has CloudFerro implemented a due diligence process?	Yes – the process is implemented and documented
Formal basis	Integrated Management System (ISO 9001, ISO 27001); Double Materiality Assessment (DMA) 2024/2025
Responsible body	ESG Committee; Management Board of CloudFerro SA
Review frequency	Ongoing monitoring by the ESG Committee (weekly meetings); the DMA is updated whenever significant changes occur
Scope	CloudFerro SA's own operations and value chain (upstream and downstream)

a) Embedding due diligence in corporate governance

Responsibility for overseeing the due diligence process rests with the Management Board of CloudFerro SA. ESG matters are presented to the Supervisory Board once a quarter, including twice a year as a separate item on the meeting agenda. Operational coordination of the process is provided by the ESG Committee, comprising the ESG Specialist, a representative of the HR Department, and the Quality Specialist. The Committee meets weekly and is responsible for the ongoing monitoring of ESG indicators, risk identification, and coordination of activities between departments.

b) Identification and assessment of adverse impacts

The primary tool for identifying impacts, risks and opportunities is the Double Materiality Assessment (DMA), carried out between October 2024 and March 2025 and approved by the Management Board in April 2025. The assessment covered:

- **Own operations:** data centres, offices and IT infrastructure of CloudFerro SA across all locations.
- **Upstream:** suppliers of server hardware, electricity, and telecommunications and IT services.
- **Downstream:** institutional clients, data platform users, and consortium partners in European projects.

The DMA process applied a double perspective – impact materiality (the effects of CloudFerro's operations on the environment and society) and financial materiality (the impact of ESG factors on CloudFerro's performance). The assessment was based on the following criteria: scale of impact, scope, irremediability and likelihood of occurrence. Key stakeholders were engaged in the process, including coworkers (an in-person workshop), B2B clients, consortium partners, shareholders and lenders.

c) Actions to mitigate adverse impacts

Based on the DMA results, CloudFerro has implemented, and plans to implement further actions to mitigate the identified impacts. A detailed description of the policies and actions for each material topic is provided in Sections 5, 6 and 7 of this report (requirement IR-3). Key actions include:

- Purchase of electricity from renewable sources (RES) for all data centres - 100% in 2025.
- Modernisation of IT infrastructure towards higher energy efficiency (replacing drives with 20-22 TB capacity units).
- Implementation of responsible electronic equipment disposal procedures (WEEE) in line with the Waste Electronic Equipment Management Procedure.
- Delivery of an ethics training programme for coworkers.
- Verification of key suppliers' compliance with human rights and ESG standards.

d) Monitoring effectiveness and reporting

The effectiveness of ESG activities is monitored using the KPIs set out in CloudFerro's ESG Strategy 2025-2027. The results are regularly analysed by the ESG Committee and presented to the Management Board. This report constitutes the first public disclosure of the results of the due diligence process. The company intends to regularly update the Double Materiality Assessment in line with changes in its operations and the regulatory environment.

The due diligence process is documented. Its formal basis comprises the Integrated Management System (ISO 9001, ISO 27001) and the Double Materiality Assessment 2024/2025 (version 1.0.35, approved on 14 April 2025). The full DMA documentation is available in the company's internal repository.

Impact of the due diligence process on the materiality assessment and the report

The due diligence process had a direct impact on the shape of this report:

- **The report's thematic scope** results directly from the DMA findings. The topics covered by the report (E1, E4, S1, S4, G1) were identified as material during the due diligence process.
- **Materiality thresholds** (3.8-5.0 on the assessment scale) were defined during the DMA process and form the formal basis for decisions to include or exclude topics from the scope of the report.
- **CloudFerro's ESG Strategy 2025-2027** is a direct product of the due diligence process - its strategic objectives and actions respond to the identified material impacts and risks.
- **Stakeholder feedback** gathered during the DMA (a coworker workshop, surveys of clients and consortium partners, and meetings with the investor and lenders) influenced the final list of material topics and the shape of the ESG objectives.

2.5 ESG risk management system

Risk management at CloudFerro is carried out within the Integrated Management System, based on the ISO 9001 and ISO 27001 standards and cloud service security standards. The system encompasses the identification, assessment and monitoring of risks associated with the company's operations.

ESG issues have been incorporated into the risk management system through the Double Materiality Assessment, the results of which form the basis for identifying key ESG risks and impacts. Responsibility for monitoring ESG risks lies with the ESG Specialist.

As at the date of this report, the company had identified one risk in the ESG area - relating to the potential failure to meet sustainability reporting requirements should CloudFerro SA become subject to a reporting obligation under the CSRD directive or its successors. This risk arises from the dynamically changing EU regulatory environment in the ESG area. It is monitored through ongoing tracking of regulatory changes and the adaptation of procedures and data collection systems to potential future requirements - an example of which is this report, prepared voluntarily on the basis of the ESRS LSME standard.

2.6 Compliance and ethics policies

CloudFerro conducts its business in accordance with applicable law and the internal ethical standards set out in its Code of Conduct. This document establishes principles of responsible coworker conduct, including anti-corruption measures, the avoidance of conflicts of interest, and acting honestly and transparently. The Code applies to all coworkers in the company and is publicly available on the CloudFerro website (https://cloudferro.s3.waw3-2.cloudferro.com/wp-content/uploads/2025/10/Kodeks-postepowania_CloudFerro-1.pdf)

In 2025, 89% of coworkers were trained on the principles of the Code of Conduct and ethics. The company's strategic goal is to achieve 100% annually - we send periodic reminders to coworkers who have not yet completed the training.

The company operates two channels for reporting breaches, which form part of the due diligence system and provide a way to safely and confidentially flag irregularities:

Internal reporting channel – a written platform enabling reports to be made anonymously or by name, available to all coworkers, candidates, former coworkers, as well as suppliers and consortium partners. The procedure derives from the Whistleblower Protection Act of 14 June 2024. Reports are received and analysed by the Ethics Committee, which reports follow-up actions to the Management Board.

External/public reporting channel (https://cloudferro.com/violation-reporting-procedure/) – available to all external stakeholders, including clients and business partners. The link is published on the CloudFerro website.

Both channels ensure confidentiality and protect the identity of the reporting person. Ethical principles and procedures are available to coworkers on the company's intranet, and selected documents are published on the website.

CHAPTER 03

Business model and strategy



3.1 Business model

CloudFerro provides cloud computing services and large-scale data processing solutions, delivering services under subscription and pay-as-you-go models for public-sector, scientific and commercial clients. The company supports organisations running projects that require high system availability, data security and the capacity to process large datasets.

A significant area of CloudFerro's activity is support for the European Earth observation data ecosystem, including platforms such as CREODIAS, WEkEO and the Copernicus Data Space Ecosystem (CDSE). These platforms enable users to search, browse and download satellite data, in particular data from the Copernicus programme.

Copernicus programme data is publicly available and free of charge, meaning there are no licence fees for its use. However, working effectively with very large datasets, including multi-petabyte repositories of satellite imagery and environmental data, requires appropriate technological infrastructure, computing power, storage space and specialised analytical tools.

In this area, the value delivered by CloudFerro lies in providing cloud environments and technological services that enable the storage, processing, analysis and integration of data with clients' systems. Services include access to computing infrastructure, storage space, analytical environments, technical support and dedicated project-based solutions, among others.

Depending on clients' needs, services are provided under various cooperation models, including subscriptions, dedicated projects, or billing based on actual resource usage. The business model is based on long-term client relationships and cooperation with suppliers of technical infrastructure, electricity and telecommunications services, which form a significant part of the company's value chain.

CloudFerro's solutions are used, among other things, in environmental monitoring, climate research, agriculture, security and crisis management.

In the context of sustainability, the key elements of CloudFerro's business model are:

- Intensive electricity consumption by IT infrastructure and data centres – the main source of the company's environmental footprint.
- Dependence on server hardware suppliers – the supply chain accounts for 93.7% of Scope 3 emissions (capital goods).
- Long-term relationships with institutional clients – high requirements regarding security, reliability and data.

European infrastructure and data jurisdiction – a differentiating factor in the cloud market.

Supporting climate research and environmental monitoring – the positive impact of CloudFerro's services on environmental protection.

3.2 Sustainability context

CloudFerro's operations are based on data centre infrastructure and data processing systems, the functioning of which entails significant electricity demand. Efficient energy consumption management is an important element of the environmental context of the company's operations and is one of the priorities of CloudFerro's ESG Strategy 2025-2027.

The environmental impact of CloudFerro's operations relates primarily to greenhouse gas emissions arising from electricity consumption. In 2025, an additional source of emissions was the one-off filling of the cooling installation with refrigerant during the commissioning of the new data centre in Łódź. The company is taking action to reduce this impact through the purchase of electricity from renewable sources and the modernisation of its IT infrastructure.

One example of such action is the gradual replacement of infrastructure components with more energy-efficient solutions, including the use of higher-density storage media (20-22 TB drives instead of 8 TB drives), which enable three times more data to be stored for the same energy consumption.

CloudFerro also provides data processing services and platforms used in sectors related to climate research and Earth observation. The company's cloud infrastructure supports scientific and public institutions in conducting analyses of environmental and climate change, including through the CREODIAS, WEkEO and Copernicus Data Space Ecosystem (CDSE) platforms.

3.3 Link between material impacts, risks and opportunities and the strategy and business model

Based on the results of the Double Materiality Assessment (DMA), the identified material impacts, risks and opportunities (IROs) are directly linked to CloudFerro's business model and strategy. The table below presents this link for each material ESG topic.

ESG topic	Link to the business model	Impact on CloudFerro's strategy	Time horizon
E1 – Climate change	Data centres consume large amounts of electricity. Rising energy prices have a direct impact on operating costs.	CloudFerro purchases 100% of its electricity from renewable sources; modernises its IT infrastructure; and monitors PUE and REF indicators. Target: an energy consumption ratio of 0.86 W/TB by 2027.	Short- and medium-term
E4 – Biodiversity	Data centres occupy space in urban and industrial areas. There are no data centres near protected areas.	The data centre locating policy takes into account the absence of proximity to Natura 2000 and KBA areas. The topic is monitored.	Medium- and long-term
S1 – Own workforce	Coworkers competencies and engagement are key to the quality of technology services and client relationships.	CloudFerro invests in training and development; builds an organisational culture based on transparency; and rolls out its Engaged Leader Academy.	Short- and medium-term
S4 – Consumers	CloudFerro's platforms serve large groups of end users. Providing access to satellite data is part of the company's social mission.	CloudFerro is expanding its STAC catalogue (target: 1,200 collections by 2027); ensures GDPR compliance; and maintains service quality and reliability.	Short- and medium-term
G1 – Business Conduct	Protection of customer and platform user data is a key element of the service. Reputational breaches could threaten business continuity.	CloudFerro maintains ISO 27001, BSI 200-1 and BSI C5 certifications; has implemented ISO 27017 and 27018; and conducts ethics training (89% of coworkers in 2025).	Short-term (ongoing)

Current financial effects of material risks to the financial position, results and cash flows of CloudFerro SA, identified in the DMA process:

> E1 – Resilience of IT infrastructure to climate change (DMA financial score: 3.9): an increase in extreme weather events and ambient temperature may affect the availability and operating costs of data centres. The Company mitigates this risk through the diversification of data centre locations and a multi-site architecture.

> G1 – Personal data protection and customer data security (DMA financial score: 4.1): a data security incident could result in financial penalties (GDPR), loss of customers and remediation costs. The Company mitigates this risk through ISO 27001, BSI C5, ISO 27017 and 27018 certifications.

> S4 – Access to high-quality information for end users (DMA financial score: 4.0): unavailability or low quality of EO (Earth observation) platforms could result in the loss of institutional customers and revenue. The Company mitigates this risk through a multi-site architecture and continuous monitoring of service quality.

3.4 ESG Strategy 2025–2027

The ESG strategy of CloudFerro combines the development of cloud technologies in the field of Earth observation with a responsible approach to the environment, society and governance. It was developed on the basis of the Double Materiality Assessment results and approved by the Supervisory Board in September 2025. The strategy is based on three pillars – Environment, Social and Governance – with specific targets and measurable KPIs for 2025–2027.

By engaging in initiatives such as the Copernicus programme, we aim to ensure that our services not only support our customers and partners, but also make a genuine contribution to building a more sustainable future.

Environment – environmental objectives

Area	Goal	Implemented activity	KPI	2024 - baseline	2025 Goal	2026 Goal	2027 Goal
CO_2 emissions	Reducing carbon footprint in scope 1 and 2	Use of data centers powered by renewable energy (RES)	% of energy from RES in total energy consumption	99,51%	100%	100%	100%
CO_2 emissions	Reducing carbon footprint in scope 1 and 2	• Electricity from RES in offices • Equipping the server assembly department with a photovoltaic installation • Equipping the equipment service department with an electric van	% of energy from RES in total electricity consumption	92,2%	100%	100%	100%
Energy efficiency	Optimisation of energy consumption in scope 1 and 2	Modernization of IT infrastructure - increasing the share of high-capacity disks in the satellite data repository	Power consumption [W] per unit of disk capacity [TB]	0,97	0,94	0,90	0,86
E-waste management	Responsible disposal of equipment	Implementation of recycling procedures	% of equipment disposed in accordance with Waste Management Procedure for Waste Electronic Equipment	No procedures	100%	100%	100%

Social – social objectives

Area	Goal	Implemented activity	KPI	2024 – baseline	2025 Goal	2026 Goal	2027 Goal
Equality and diversity	Creating a fair and inclusive work environment	• Transparent remuneration policy • Addressing unjustified pay gaps between women and men	Yes/No - implemented changes	Lack of a clearly communicated compensation policy and a calculated adjusted pay gap	Transparent compensation policy, calculated adjusted pay gap	Addressed pay gaps, transparent rewards policy	Monitoring
Employees development	Investing in development of competencies	• Training and courses for employees - ensuring achievement of business goals and skills development • Training and courses for managers	Average number of hours of training per employee per year, evaluation of training in the engagement survey, % of managers covered by leadership training	16,54 hours per employee	95% of managers covered by the Engaged Leader Academy	Introduction of a methodical process for periodic evaluation	Individual development plans for key employees
Employees well-being	Taking care of the health and well-being of employees	• Employeess integration around sports initiatives • Providing opportunity to consult a psychologist • Building a friendly space in the office, supporting the needs of employees, enabling effective work and efficient communication	Engagement Survey	eNPS = 12	eNPS > 20	eNPS > 20	eNPS > 20
Communication with employees	Transparent communication with employees	Developing an internal communication strategy and plan focused on transparency and two-way communication	Engagement Survey	eNPS = 12	eNPS > 20	eNPS > 20	eNPS > 20
Democratic access to satellite data	Increasing access to satellite data	Increasing the usefulness of the satellite data catalog by introducing more collections to the STAC database - SpatioTemporal Assets Catalog - a common language for describing geospatial information, improving indexing and data discovery	Number of collections added to STAC	No STAC	150	300	500

Target eNPS > 20 => result eNPS = 14: A result of 14 is classified as good; this represents an increase of +2 points versus 2024, with the percentage of positive responses rising across all categories. The target of >20 remains ambitious – the main area for improvement identified by coworkers is cross-team collaboration, which is being addressed by the cross-functional ACT team (Accountability – Commitment – Transparency) and through greater pay transparency.

Governance – corporate governance objectives

Area	Goal	Implemented activity	KPI	2024 – baseline	2025 Goal	2026 Goal	2027 Goal
Ethics and Compliance	Promoting ethical culture	Training in the code of ethics, whistleblowing and mobbing	% of employees trained in the code of ethics, whistleblowing and mobbing	No training	100%	100%	100%
Transparency	Increasing transparency of activities	Publication of the ESG annual report in a concise, compliant with VSME - the voluntary non-financial reporting standard for small and medium-sized enterprises	Yes/No – report available online	No report	No report	2025 report available online	2026 report available online
Cybersecurity	Expansion of the information security certifications/attestations portfolio	• Transfer of ISO 27001 and 9001 certificates from PRS to ISOQAR (wider certification offer) • Extension of certification to ISO 27017 and 27018 - Q4 2025	• Maintaining ISO 27001, BSI 200-1, BSI C5 certifications • Obtaining ISO 27017, 27018 certifications	Certyficates ISO 27001, BSI 200-1, BSI C5	ISO 27001, BSI 200-1, BSI C5, ISO 27017, ISO 27018 Certifications	ISO 27001, BSI 200-1, BSI C5, ISO 27017, ISO 27018 Certifications	ISO 27001, BSI 200-1, BSI C5, ISO 27017, ISO 27018 Certifications
Cybersecurity	Implementation of multi-site architecture for the EO Data repository	Implementation of multi-site architecture for the EO Data repository, to minimize the risk of business continuity disruption in the event of a major failure of a single location	Number of active locations supporting the EO Data repository in multi-site architecture	No system	Data from at least 1 week available in at least 2 locations	Data from at least 1 week available in at least 2 locations	Data from at least 1 week available in at least 2 locations
Certification	Upgrade of the overall EcoVadis rating	Implementation of a programme to improve compliance with EcoVadis guidelines - a global platform that assesses companies for their commitment to sustainability	Medal level achieved in EcoVadis	No system	increase in overall rating by 5-10% year-on-year	increase in overall rating by 5-10% year-on-year	increase in overall rating by 5-10% year-on-year
Cooperation with suppliers and subcontractors	Cooperation with suppliers respecting human rights and sustainable production	Verification of key CF suppliers for human rights compliance in the value chain and sustainable production	% of key suppliers who signed the declaration	No rating	100%	100%	100%

Target: 100% of coworkers trained on the Code of Conduct => result – 89%: 89% of coworkers confirmed participation in the training. The Company continues its efforts to achieve 100% confirmed training completion in 2026.

Target: EO Data Multisite => result – in progress The EO Data Multisite is a highly complex project, undertaken from both a technical and organisational perspective, involving significant infrastructure changes. During implementation it was confirmed that the scope of work requires a longer timeline than originally assumed. The project is at an advanced stage of implementation – achievement of the target is planned for 2026.

CHAPTER 04

Double Materiality Assessment (DMA)



4.1 DMA methodology

Between October 2024 and March 2025, CloudFerro conducted a formal Double Materiality Assessment (DMA) in accordance with ESRS requirements. The purpose of the analysis was to identify the most significant impacts, risks and opportunities (IROs) associated with the Company's operations. The assessment was approved by the Company's Management Board in April 2025.

The DMA covered only the operations of CloudFerro SA and was conducted taking into account the Company's entire value chain – both upstream areas (including infrastructure and service suppliers) and downstream areas (the cloud services provided and users of CloudFerro's platforms).

Two assessment perspectives

The analysis was conducted from two perspectives:

> **Impact materiality** – the impact of CloudFerro's operations on the environment and society. Four criteria were assessed: scale of impact, scope of impact, irremediability and likelihood of occurrence – each on a scale of 1–5.

> **Financial materiality** – the impact of ESG factors on CloudFerro's financial performance. Two criteria were assessed: impact on the budget (weighted 70%) and likelihood of occurrence (weighted 30%).

Materiality thresholds

Score	Classification
3.8 – 5.0	Material topic
2.1 – 3.7	Moderately material topic – monitored
below 2.0	Non-material topic

CloudFerro applies an ESRS-compliant principle whereby a topic is deemed material if it meets the impact materiality or financial materiality criterion. Reaching the threshold of 3.8 in either perspective is sufficient for a topic to be classified as material.

Four stages of the process

The DMA process comprised four main stages:

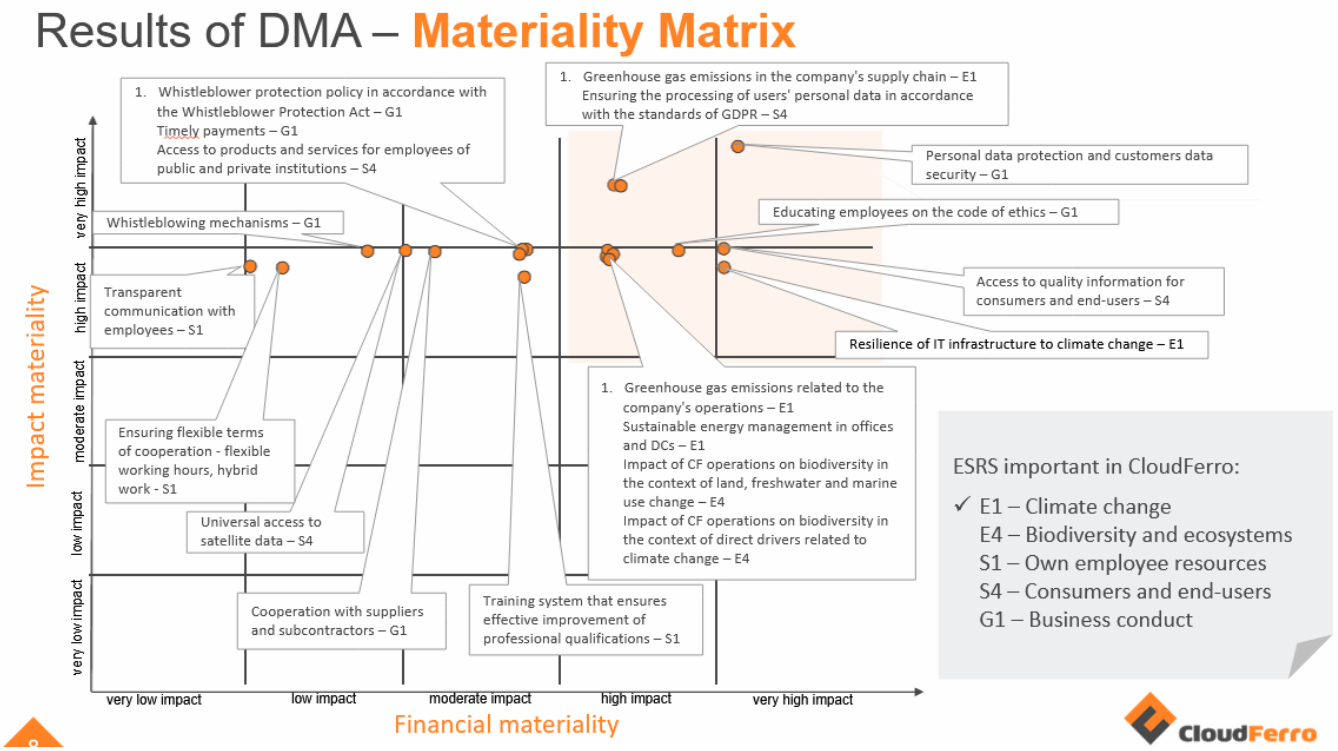
1. Understanding the business context and developing a stakeholder engagement strategy.

2. Identifying potential impacts, risks and opportunities (IROs).

3. Assessing the materiality of individual ESG topics.

4. Consolidating and approving the assessment results.

The DMA process drew on CloudFerro's internal data (energy, HR and financial), industry publications and ESG reports from cloud technology sector companies, EU regulations, and the results of stakeholder surveys and interviews. The expert assessment was carried out by an internal team with support from Bulls Eye Consulting. The time horizons applied were: short-term (up to 1 year), medium-term (3 years) and long-term (5 years).



4.2 Stakeholder engagement

Six key stakeholder groups, identified as relevant to CloudFerro's operations, were engaged in the DMA process:

Stakeholder group	Form of engagement	Key topics identified	Influence on the DMA
Coworkers	In-person workshop (22 January 2025, 11 participants, dot-voting)	Waste management, ethics, whistleblower protection, mental health, anti-discrimination	High – the workshop results directly influenced the materiality assessment of the S1 and G1 topics
Shareholders (Innova Capital)	Online meeting	Decarbonisation, diversity, waste, data access, data centre cooling risk	High – the investor's perspective influenced the weighting of the E1 and G1 topics
Management Board and managers	Dedicated survey	Energy efficiency, ethics, cybersecurity, coworkers development	High – as internal stakeholders they confirmed the strategic priorities
Consortium partners and B2B customers	Online survey (6 responses out of a dozen or so sent)	Data centre energy efficiency, environmental certifications, service stability	Medium – confirmed the materiality of E1; the suggestion to pursue ISO 14001 was taken on board and is planned for 2026.

Stakeholder group	Form of engagement	Key topics identified	Influence on the DMA
CREODIAS platform users	Online survey (7 responses)	Energy efficiency, ethical management, data protection, data access	Medium – confirmed the priorities of E1 and S4
Lenders (Santander Leasing)	Online meeting	Supply chain stability, CO_2 emissions reduction, employment standards, human rights	Low – not a key stakeholder; their perspective was taken into account in a supporting capacity

The results of stakeholder engagement directly influenced the final materiality assessment of individual ESG topics. Topics identified as important by all stakeholder groups were included on the list of material topics. Topics identified by only some groups were verified by the internal team together with the impact and financial materiality criteria.

4.3 Material topics – DMA results

As a result of the DMA, five material ESG topics covered by this report were identified:

Standard	Area	Material topic	Impact materiality	Financial materiality	Assessment
ESRS E1 – Climate Change					
E1	Climate change	Resilience of IT infrastructure to climate change	**3.8**	**3.9**	✓ Material
E1	Climate change	GHG emissions associated with operational activities	**4.0**	**3.3**	✓ Material
E1	Climate change	GHG emissions in the supply chain	**4.6**	**3.0**	✓ Material
E1	Climate change	Sustainable energy management in offices and data centres	**4.0**	**3.3**	✓ Material
ESRS E4 – Biodiversity and Ecosystems					
E4	Biodiversity	Impact of operations on biodiversity – change in land use	**4.0**	**3.3**	✓ Material
E4	Biodiversity	Impact of operations on biodiversity – climate change-related factors	**4.0**	**2.8**	✓ Material
ESRS S1 – Own Workforce					
S1	Coworkers	Transparent communication with coworkers	**3.8**	**1.0**	✓ Material
S1	Coworkers	Flexible working arrangements (hybrid work, flexible hours)	**3.8**	**1.3**	✓ Material
S1	Coworkers	A training system ensuring effective skills development	**3.8**	**2.7**	✓ Material
ESRS S4 – Consumers and End Users					
S4	Consumers	Processing of users' personal data in accordance with GDPR	**4.6**	**3.4**	✓ Material
S4	Consumers	Access to high-quality information for end users	**4.0**	**4.0**	✓ Material

Standard	Area	Material topic	Impact materiality	Financial materiality	Assessment
S4	Consumers	Widespread access to satellite data	**4.0**	**2.0**	✓ Material
S4	Consumers	Access to services for public and private institutions	**4.0**	**2.5**	✓ Material
ESRS G1 – Business Conduct					
G1	Ethics and compliance	Protection of personal data and customer data security	**5.0**	**4.1**	✓ Material
G1	Ethics and compliance	Coworkers training on the code of ethics	**4.0**	**3.7**	✓ Material
G1	Ethics and compliance	Whistleblower protection policy	**4.0**	**2.7**	✓ Material
G1	Ethics and compliance	Cooperation with suppliers and subcontractors	**4.0**	**2.3**	✓ Material
G1	Ethics and compliance	Timely settlement of payments	**4.0**	**2.7**	✓ Material
G1	Ethics and compliance	Mechanisms for reporting irregularities	**4.0**	**1.7**	✓ Material

The table above presents all topics identified as material in the DMA process. Scores are expressed on a scale of 1–5 in accordance with the methodology described in Section 4.1.

4.4 Non-material omitted topics – rationale

4.4.1 Topics deemed non-material under the DMA, voluntarily included in the report

The following topics were not identified as material in the Double Materiality Assessment (Section 4.3); however, CloudFerro has chosen to include them in the report on a voluntary basis for the sake of transparency and data availability:

Standard	Topic	Rationale for inclusion despite non-materiality	Location
E2	Pollution	Data on F-gases (Scope 1) are available through reporting to KOBiZE; the significant increase in emissions in 2025 relates to the launch of the new data centre in Łódź.	Section 5.2
E3	Water resources	Air cooling is used at all data centre locations – process water consumption is 0 m^3. This information is disclosed to confirm the absence of impact.	Section 5.3
E5	Circular economy and waste	The volume of waste generated is small, but the company maintains reliable documentation (the BDO system). As the company grows, this topic will become increasingly significant.	Section 5.5
S1-10	Diversity	The employment structure reflects the realities of the IT sector. The company does not identify any systemic barriers, but monitors and discloses full data.	Section 6.1.12

4.4.2 Data omitted under transitional provisions

The following disclosure requirements relate to topics identified as material in the DMA process (S1); however, the specific data under these requirements have been omitted from this report under the ESRS LSME transitional provisions:

Standard	Topic	Rationale for omission	Basis
S1-6	Training metrics by gender	The breakdown of training hours by gender has been omitted for the first two reporting years. This data will be included in the 2027 report.	Ph-in 2
DR 13 (IR-5)	Engagement with value-chain stakeholders and remediation mechanisms	Omitted for the first two reporting years for companies with fewer than 500 employees. This applies to workers in the value chain, affected communities and consumers.	Ph-in 2 (\<500 employees)

4.5 List of disclosure requirements covered by the report (IR-2)

A full list of the disclosure requirements covered by this report, together with information on the fulfilment status of each requirement, is provided in Annex A (Table IR-2). The table also indicates which requirements have been omitted and on what basis.

CHAPTER 05

Environment



5.1 ESRS E1 – Climate Change

CloudFerro's operations are directly linked to the use of IT infrastructure and data centre resources, which means that climate-related issues, in particular energy consumption, greenhouse gas emissions and the energy efficiency of infrastructure, constitute a material area of environmental management. The significance of these topics was confirmed in the Double Materiality Assessment, in which climate change was identified as one of the key ESG topics for the company (Section 4.3).

5.1.1 Policy

Content and objectives: CloudFerro has an Environmental Policy (POL-14) setting out the company's general principles and commitments regarding the minimisation of its environmental impact, including the efficient use of energy and resources. Together with the Double Materiality Assessment, the Policy forms the basis for the climate-related actions and targets set out in the CloudFerro ESG Strategy 2025–2027.

Scope: CloudFerro SA's own operations at all locations (data centres and offices)

Responsibility: The CloudFerro SA Management Board (approval of the policy and strategy); the ESG Committee and Hardware Department (operational implementation)

Reference to external standards: Environmental Policy (POL-14); GHG Protocol, ISO 14064-1 (emissions measurement methodology); the Envirly platform (TÜV NORD certified)

5.1.2 Actions

- **Purchase of electricity from renewable sources for all data centres** – completed, 100% in 2025.
- **Modernisation of storage infrastructure** – gradual replacement of standard HDDs with more energy-efficient, higher-density helium drives (20–22 TB), enabling greater data storage capacity at lower energy consumption per unit of data. CloudFerro also reuses server chassis wherever technically feasible.
- **Renewable electricity in offices** – equipping the server assembly facility with a photovoltaic installation and providing an electric vehicle for the hardware service team – timeframe: 2025–2026.
- **Responsible disposal of electronic equipment** in accordance with the Waste Management Policy (POL-16) and the Waste Electronic Equipment Management Procedure – an ongoing activity.

Monitoring of data centre energy efficiency using PUE (Power Usage Effectiveness) indicators – an ongoing activity, also used as a criterion for assessing new infrastructure locations.

Optimisation of the infrastructure portfolio – planned phase-out of less energy-efficient locations in future periods.

5.1.3 Targets

Target	Indicator	2024 – baseline year	2025	2026	2027	Scope / methodology
Reduction of the carbon footprint in Scope 1 and 2	% of energy from renewable sources in total electricity consumption	99.4%	**100%✓**	**100%**	**100%**	Relative target; own operations
Optimisation of energy consumption	Energy consumption [W] per unit of disk capacity [TB]	0.97	**0.94 ✓**	**0.90**	**0.86**	Absolute target; 2024 baseline year: 0.97 W/TB

✓ = target achieved in 2025.

5.1.4 Metrics – emissions and energy (E1-1 to E1-6)

CloudFerro regularly monitors its greenhouse gas emissions in accordance with the GHG Protocol and ISO 14064-1 methodologies, using the Envirly platform (certified by TÜV NORD). Since 2023, the company has prepared annual emissions reports covering Scope 1, Scope 2 and Scope 3, all of which are available on the website, under the Sustainable Development section: https://cloudferro.com/sustainability/

Indicator	2024	2025	Change
Total emissions [tCO_2eq]	11,602.4	**19,278.7**	+66.2%
Scope 1 [tCO_2eq]	20.5	**404.8**	+1,874%*
Scope 2 (market-based) [tCO_2eq]	75.3	**35.6**	–52.7%
Scope 2 location-based [tCO_2eq]	8,483.6	**7,977.6**	–5.9%
Scope 3 [tCO_2eq]	11,506.5	**18,838.3**	+63.7%
Energy consumption [MWh]	12,650.4	**14,461.6**	+14.3%
Energy from renewable sources (RES) [%]	99.4%	**100%**	+0.06pp
PUE ratio (range)	1.20 – 1.65	**1.18 – 1.57**	lower PUE bounds (both lower and upper)

* The percentage increase is high due to the very low 2024 baseline (20.5 tCO_2eq).

5.1.5 Explanation of the increase in emissions in 2025

The significant increase in emissions in 2025 compared with the previous period resulted primarily from the development of the Company's own technical infrastructure, in particular the launch of a new data centre location in Łódź. The increase in direct emissions (Scope 1) was related to the installation of a cooling system and the one-off filling of the installation with refrigerant during assembly. CloudFerro installs its technical infrastructure itself in the leased DC premises in Łódź, and the associated emissions are therefore included in the Company's Scope 1. The increase in Scope 3 emissions resulted mainly from capital expenditure related to the purchase and installation of technical infrastructure (capital goods accounted for 93.7% of Scope 3 emissions in 2025). These events were related to development and investment activities, rather than resulting from an increase in the emissions intensity of ongoing operations. No increase of this scale is expected in subsequent reporting periods, as the filling of the cooling system was a one-off event. The level of Scope 3 emissions will depend on the scale of future infrastructure investments, in line with the Company's development plans.

5.1.6 Energy efficiency of infrastructure

One of CloudFerro's key areas of action is improving the energy efficiency of its IT infrastructure. Progress in this area is monitored using the indicator of energy consumption [W] per unit of disk capacity [TB], which is included in the Company's environmental targets. In 2024, the baseline value was 0.97 W/TB, and the target for 2025 (0.94 W/TB) was achieved.

New infrastructure is being developed in line with high energy efficiency standards – the design PUE for the new location in Łódź is 1.25.

5.1.7 Coworkers commuting data (Scope 3)

Data on employee commuting and business travel were collected through a voluntary survey conducted on the Envirly platform. In 2025, the survey was completed by 35% of coworkers (compared with 16% in 2024).
The result was extrapolated to the full workforce based on the average value per respondent.

The full source data on GHG emissions are contained in the reports entitled "Greenhouse Gas Emissions Report of CloudFerro S.A." for 2023, 2024 and 2025, prepared by the Envirly platform and certified by TÜV NORD, available on the CloudFerro website under the Sustainable Development tab -https://cloudferro.com/sustainability/

5.2 ESRS E2 – Pollution (voluntary disclosure)

The topic of E2 (pollution) was not identified as material in the Double Materiality Assessment process (Chapter 4.4). CloudFerro discloses the following information voluntarily due to the availability of data reported to KOBiZE and the significant increase in refrigerant emissions under Scope 1 in 2025.

5.2.1 Policy

CloudFerro does not have a separate policy on pollution. The management of refrigerant emissions is carried out under the Environmental Policy (POL-14) and technical procedures relating to the installation and servicing of cooling systems.

5.2.2 Data and context

Scope 1 refrigerants emissions increased from 0 tCO_2eq in 2024 to 387.5 tCO_2eq in 2025, in accordance with the GHG Protocol methodology applied by the Envirly platform. This increase results from the one-off filling of the cooling installation with refrigerant during the assembly of technical infrastructure at the Łódź data centre. The Company also reports F-gas emission data to KOBiZE, in accordance with national regulatory requirements.

Data on F-gas emissions are reported both to KOBiZE (in accordance with national requirements) and calculated by the Envirly platform in line with the GHG Protocol methodology – for the purposes of this report, data from the Envirly platform were used.

5.3 ESRS E3 – Water resources (voluntary disclosure)

The topic of E3 (water resources) was not identified as material in the Double Materiality Assessment process (Chapter 4.4). CloudFerro discloses the following information voluntarily to confirm the absence of a material impact in this area.

5.3.1 Policy

CloudFerro does not have a separate policy on water resources. In 2025, the Company began work on a dedicated water management policy (POL-19), which, due to its early stage, is not yet included in this report.

5.3.2 Data and context

CloudFerro uses air cooling at all its data centre locations, which means that technological water consumption in cooling processes is 0 m^3. In 2025, the Company did not abstract, consume or discharge water in connection with the operational activities of its data centres.

5.4 ESRS E4 – Biodiversity and ecosystems

Due to the nature of CloudFerro's business, the Company's direct impact on biodiversity and ecosystems is limited. CloudFerro does not carry out industrial, extractive or manufacturing activities that would involve significant land transformation or direct interference with natural habitats. The potential environmental impact relates primarily to the use of IT infrastructure and the energy demand of data centres.

5.4.1 Policy

Content and objectives: CloudFerro does not have a formal biodiversity policy. Although the topic was identified as material in the DMA process, the actual impact of the Company's operations on biodiversity is assessed as limited – all data centres are located in urban and industrial areas, away from protected areas (Natura 2000, KBA).

Scope: All CloudFerro data centres (Warsaw, Łódź, Frankfurt, Bologna, Frascati, Kajaani, Barcelona, Darmstadt).

Responsibility: ESG Committee – monitoring of locations in the process of selecting new DC facilities.

5.4.2 Actions

> **Verification of data centre locations** with regard to proximity to protected areas (Natura 2000, KBA) – completed for all current DC locations. None of the locations is adjacent to a protected area.

> **Incorporation of environmental criteria** in the selection of new DC locations in the future – planned, ongoing action.

> **No need to obtain special environmental permits** applicable to industrial activities – this results from the Company's operational profile.

5.4.3 Targets

CloudFerro does not currently have formalised, measurable targets in the area of biodiversity. The topic is monitored as part of the annual review of data centre locations.

5.4.4 CloudFerro's positive contribution to environmental protection

Regardless of its limited direct impact on biodiversity, CloudFerro makes a positive contribution to environmental protection by providing cloud infrastructure and data processing services for projects related to Earth observation, climate research and environmental monitoring. The solutions supported by CloudFerro enable the analysis of satellite data used, among other things, for monitoring climate change, managing natural resources and responding to crisis situations.

“Seize the Beauty of our Planet” competition

Since 2019, CloudFerro has organised an international photography competition for the most beautiful satellite image of Earth. In 2025, its sixth edition was held under the theme **“Cities and Nature”**, *devoted to the relationship between urbanisation and the natural environment. The competition encourages the use of publicly available Copernicus satellite data (via the CREODIAS, CDSE, WEkEO, CODE-DE and EO-Lab platforms) and promotes its application in environmental monitoring, spatial planning and crisis management. The theme of the sixth edition refers to one of the greatest challenges of the 21st century – by 2050, nearly 70% of humanity will live in cities, which already generate approximately 75% of global greenhouse gas emissions. Twelve photographs selected through online voting were featured in the CloudFerro’s 2026 calendar, distributed among institutions and organisations in the Earth observation sector in Poland and across Europe. The three best entries were awarded prizes by a jury composed of experts in the field of satellite data. More information: https://cloudferro.com/contest2025/*



Copenhagen’s Golden Veins of Urban Life: A Model for Climate-Ready Cities - winning photo in the “Seize the Beauty of Our Planet” contest, 2025 edition

5.5 ESRS E5 – Circular economy and waste (moderately material, monitored)

The topic of E5 (circular economy and waste) was assessed in the Double Materiality Assessment process as moderately material, given the relatively small volume of waste generated by the Company. CloudFerro discloses the following information voluntarily and will monitor this topic in subsequent reporting years.

5.5.1 Policy

CloudFerro has a **Waste Management Policy (POL-16)**, which sets out the rules for handling waste generated by the Company's operations, including rules on segregation, transfer to authorised entities and minimisation of waste volumes. The policy applies the 3R principle: Reuse, Renew, Recycle. The policy is approved by the relevant Management Board member and applies to all Company coworkers.

5.5.2 Actions

- **Disposal of waste electrical and electronic equipment (WEEE)** in accordance with the WEEE Waste Management Procedure – an ongoing action. All used equipment is transferred to authorised entities for recycling.
- **Reuse of hardware components** – CloudFerro applies an approach consistent with the principle of reusing technical resources, including the reuse of server enclosures where technically justified.
- **Segregation of office waste** in accordance with local legal requirements at all of the Company's office locations.

5.5.3 Metrics

The Company maintains an internal waste register. The data below present waste volumes by main category:

Waste category	Unit	2024	2025
Waste electrical and electronic equipment (WEEE)	kg	313.1	**252.9**
Plastics	kg	2,361.7	**578.8**
Paper and cardboard	kg	40,388	**3,133**
Glass	kg	8.2	**1.6**
Bio	kg	4.8	**1.8**
Mixed waste	kg	9,208	**7,992**
Hazardous waste	kg	0	**0**
Total kg		16,283.8	**11,890.1**

CHAPTER 06

Social



6.1 ESRS S1 – Own workforce

6.1.1 Policy

Content and objectives: CloudFerro does not have a single consolidated HR policy, but carries out activities relating to equality, development and coworker wellbeing set out in the CloudFerro ESG Strategy 2025–2027, the Company Strategy and internal regulations.

Scope: all employed staff, regular B2B coworkers of CloudFerro S.A. and coworkers engaged under mandate contracts.

Responsibility: HR Department; Management Board (strategy approval).

Stakeholder engagement: Priorities are based on a coworker workshop carried out as part of the DMA (22 January 2025, 11 participants).

6.1.2 Targets

Target	Indicator	2025	2026	2027	Scope
Fair working environment	Transparent remuneration policy	**Yes** ✓	Addr. pay gap	Monitoring	Own operations
Development of managerial competencies	% of managers covered by the Engaging Leader Academy	**95%** ✓	Periodic apprais.	Individual plans	Own operations
Coworker wellbeing	eNPS score	**14**	eNPS>20	eNPS>20	Own operations

✓ = *target achieved in 2025*

6.1.3 Employment profile (S1-1)

At the end of 2025, the CloudFerro team numbered 317 people, including specialists supporting the development and maintenance of cloud infrastructure, data processing services and the delivery of technology projects with international reach. The Company is growing dynamically – over two years (2023–2025), the team grew by 37%.

Team growth	2023	2024	2025
Employed staff	95	114	**142**
B2B coworkers and coworkers under mandate contracts	136	158	**175**
Total	231	272	**317**

Indicator	Category	2024	2025
Employees (headcount)	Total	114	**142**
	Women	37 (32%)	**46 (32%)**
	Men	77 (68%)	**96 (68%)**
Permanent contract	Total	109 (96%)	**127 (89%)**
Fixed-term contract	Total	5 (4%)	**15 (11%)**
Full-time	Total	111 (97%)	**139 (98%)**
Part-time	Total	3 (3%)	**3 (2%)**
B2B coworkers and coworkers under mandate contracts (headcount)	Total	158	**175**
	Women	19 (12%)	**20 (11%)**
	Men	139 (68%)	**155 (89%)**
% of women in management positions	—	33% (10/30)	**29% (11/38)**

Data as at 31 December of each year.

6.1.4 B2B coworkers – characteristics (S1-2)

At the end of 2025, 175 people collaborated with CloudFerro under B2B agreements or mandate contracts (compared with 158 in 2024), including 20 women (11%). These are predominantly technical specialists providing services in software engineering, systems administration, data analysis and project management.

Data are presented as headcount (number of people) as at 31 December 2025.

6.1.5 Collective agreements and social dialogue (S1-3)

Employees of CloudFerro SA are not covered by collective bargaining agreements. The company has no trade union or works council. Dialogue with employees is conducted directly by management and the HR department, as well as through the internal communication tools described later in this chapter. Under a Resolution of the President of the Management Board, an employee representative of CloudFerro SA has been appointed to cooperate with the employer in cases required by labour law provisions.

6.1.6 Adequacy of remuneration (S1-4)

In 2025, the lowest basic salary at CloudFerro SA was **PLN 5,250 gross per month**, which represented **112% of the statutory minimum wage** applicable in Poland in 2025 (PLN 4,666 gross). No person employed under an employment contract received remuneration equal to or below the minimum wage.

Indicator	2024	2025
Minimum wage in Poland [PLN gross/month]	4,242 (Jan–Jun) / 4,300 (Jul–Dec)	**4,666**
Lowest remuneration at CloudFerro SA [PLN gross/month]	5,000	**5,250**
Ratio of CloudFerro's lowest remuneration to the minimum wage	116%	**112%**
Employees earning at or below the minimum wage	0	**0**

6.1.7 Working conditions and flexible employment model

Given the specific nature of its technology business and the international character of its collaboration, CloudFerro applies a flexible work organisation model that supports both operational efficiency and team needs. The company operates a hybrid working model, combining the possibility of remote work with regular office presence, tailored to the nature of tasks and the needs of individual teams. This approach is based on the premise that direct collaboration fosters effective problem-solving, knowledge-sharing and relationship-building, while preserving organisational flexibility. The collaboration model takes into account the needs of project teams, the onboarding of new joiners, and the nature of work requiring cross-functional collaboration.

For employees engaged under employment contracts, the company has implemented a remote work policy offering a flexible hybrid working model tailored to individual needs, the option of occasional remote work, and, where justified, the possibility of working permanently from the employee's place of residence.

CloudFerro offers a benefits package supporting the health, development and wellbeing of the team. This includes, among other things, private medical care, a sports card, group insurance, and access to individual coaching support covering personal and professional development. An important part of the offer is also company-funded language training, available in several European languages, supporting the development of competencies in an international work environment.

Another important element of CloudFerro's organisational culture is team-building activities that strengthen collaboration and relationships among team members. These include both company-wide events organised several times a year and team initiatives carried out under dedicated integration budgets. In 2025, the company organised: the company's 10th anniversary celebration (February), a Children's Day event for coworkers' children (June), a city game inspired by the history of Warsaw (October), and a festive Christmas dinner (December).

6.1.8 Communication and coworker engagement

CloudFerro attaches great importance to transparent internal communication and regular dialogue with all coworkers. The aim of these activities is to support team engagement, build trust and create a work environment that meets the needs of a growing technology organisation.

One of the key tools of dialogue is the annual job satisfaction survey, which enables the assessment of team engagement levels and the identification of areas requiring attention, both at the level of the whole organisation and of individual teams. The survey is part of CloudFerro's approach to the systematic improvement of the work environment and supports the goal of building an inspiring workplace.

In 2025, the eNPS indicator was **14**, representing an increase of 2 points compared with 2024, classified as a "good" level. At the same time, an increase in the share of positive responses was recorded across all categories, with the largest increase (+11 pp) in the "direct supervisor" category and +6 pp in the "Communication" category. This is the result of the Company's efforts focused on transparent communication and the development of management staff.

What do CloudFerrians value most? The comments most frequently refer to the atmosphere and work culture, interesting projects and diverse technologies, and integration and wellbeing initiatives (the hybrid working model, flexible working hours). Cross-team collaboration was identified as the most important area for improvement. This area is being addressed through the activities of the cross-functional ACT team (Accountability – Commitment – Transparency), which, working with focus groups, will develop an action plan to improve this area.

CloudFerro supports a transparent approach to remuneration by communicating a transparent remuneration policy and conducting regular pay reviews and pay gap analyses.

Internal communication is carried out through various channels: a monthly newsletter featuring a message from the President of the Management Board, the intranet platform, Microsoft Teams channels, and quarterly CloudTalks, meetings, launched in 2025 as a forum for the exchange of information and dialogue between the management board and the whole team. Another element of the communication and responsible management system is an anonymous whistleblowing channel, enabling the safe reporting of violations, available to both coworkers and external stakeholders.

6.1.9 Training and professional development (S1-6)

Competence development is an important element of CloudFerro's approach to building the organisation's long-term potential and supporting the professional development of all coworkers. The company operates a structured competence development system, based on the planning of training needs at team level, cooperation between managers and the HR department, and an individual approach to professional development.

Training needs are identified on the basis of current and future role requirements, team development goals, and individual development needs. People working with CloudFerro can independently initiate development activities, including training, certifications, participation in conferences, specialist courses or postgraduate studies, using a dedicated training budget.

CloudFerro supports competence development across a broad range of areas, including technical competencies, project management, cybersecurity, managerial competencies, communication skills and language development. The team has access to both external and internal training as well as educational platforms supporting the development of technological competencies. CloudFerro also supports the acquisition of industry certifications, including in the areas of IT infrastructure, project management, agile methods and cloud technologies. CloudFerro's approach to competence development is based on the 70/20/10 model, which assumes that the key element of professional development is practical experience, supported by knowledge-sharing and formal training activities.

An important element of leadership competence development is the company's Engaging Leader Academy, which supports the development of managerial skills and fosters a culture of effective leadership. In 2025, the ESG target of covering 95% of managers with the programme was achieved.

In 2025, training activities covered 216 people, delivering a total of 3,273 training hours, which translates to an average of 11 hours of development per person. CloudFerro does not currently monitor the breakdown of training hours by gender. Under the transitional provision, disclosure of this breakdown is not required in the first two years of reporting.

Training indicator	2024	2025
Total number of training hours	4,106	**3,273**
People covered by training	162	**216**
Average number of training hours per person	17	**11**
Managers covered by the Engaging Leader Academy	n/a	**95%**
eNPS	12	**14**

6.1.10 Health, safety and wellbeing (S1-7)

CloudFerro is committed to ensuring a safe and supportive work environment, tailored to the nature of the company's technology business. This approach covers both meeting occupational health and safety requirements and activities supporting coworkers' wellbeing and building a healthy organisational culture.

With respect to persons covered by obligations arising from labour law, CloudFerro carries out the required occupational health and safety activities, including initial training, periodic training, OHS instructions, and occupational risk assessments tailored to the nature of positions and office locations. Since 2024, the company has been working with a specialised external partner supporting the fulfilment of OHS obligations, including conducting training and periodic audits of working conditions in CloudFerro's offices.

An important element of CloudFerro's approach to team wellbeing is creating a work environment that supports work-life balance. The company offers a flexible working model, private medical care, and access to confidential psychological and coaching support, assisting both personal development and coping with professional challenges.

In 2025, CloudFerro did not record any workplace accidents, occupational health and safety incidents, or cases of occupational disease. OHS indicators are provided for employees under employment contracts.

OHS indicator	2024	2025
Workplace accidents	0	**0**
Occupational diseases	0	**0**
OHS incidents	0	**0**
Working days lost due to accidents	0	**0**
% of employees covered by the OHS system	100%	**100%**
Total number of hours worked	182,300	**218,300**
TRIR accident rate*	0.0	**0.0**

* TRIR = (number of accidents x 200,000) / number of hours worked. TRIR = 0 means no recordable accidents.

6.1.11 Remuneration and the pay gap (S1-8)

CloudFerro carried out an analysis of the pay difference between women and men at the company. The unadjusted pay gap (not taking positions and grading into account) was **15.9% in 2025** (compared with 16.3% in 2024). After taking position grading into account (the adjusted pay gap), the difference was **8.1% in 2025** (compared with 7.1% in 2024). These figures reflect the employment structure typical of the IT industry, where women are more often represented in administrative rather than technical roles, which are traditionally more highly paid. CloudFerro monitors this area and takes action to promote pay equality, including regular pay reviews.

6.1.12 Incidents and human rights violations (S1-9)

CloudFerro monitors incidents related to violations of employee rights and ethical standards. In 2025, no formal employee complaints or incidents of discrimination or harassment were recorded. CloudFerro's coworkers have access to an internal reporting channel, hosted on an external platform, enabling the confidential and anonymous reporting of irregularities – including breaches of law, the Code of Conduct and the Work Regulations. Reports are handled by the Ethics Committee, and the procedure ensures full protection of the whistleblower's identity. An oral reporting mode is also available – a direct meeting with a member of the Ethics Committee. Coworkers may also report irregularities through the HR department or their direct supervisor.

Indicator S1-9	2024	2025
Formal employee complaints	0	**0**
Discrimination / harassment incidents	0	**0**

6.1.13 Diversity (S1-10)

In 2025, CloudFerro employed or had an ongoing working arrangement with 66 women, representing 20% of the total team (317 people). This figure reflects the realities of the IT sector, which has historically been characterised by low representation of women – estimated at approximately 20–26% globally, depending on the segment. CloudFerro monitors this area and has not identified any systemic recruitment barriers, but nonetheless treats diversity as an element of its organisational culture.

Diversity indicator	Category	2024	2025
Management Board	Women / Men	0W / 4M	**0W / 4M**
Supervisory Board	Women / Men	2W / 4M	**2W / 4M**
Management staff	% women	33% (10/30)	**29% (11/38)**
Whole team (employment contract + B2B/mandate contracts)	% women	21% (56/272)	**20% (66/317)**
People with disabilities	% of people	0%	**0%**

6.1.14 Social initiatives and community engagement

CloudFerro supports social initiatives and activities that build team engagement, treating them as an element of its organisational culture and responsible corporate conduct. The activities undertaken include both initiatives aimed at coworkers, and activities of a social and charitable nature.

One of the elements supporting the development of young talent is the paid internship programme run by CloudFerro, aimed primarily at students up to the age of 26. The programme runs during the summer period, from June to September, and provides the opportunity to gain practical professional experience in a technology environment. The number of places is adjusted to the company's current organisational needs, and where cooperation proves successful, participation in the programme may serve as a starting point for further professional collaboration.

CloudFerro is also involved in relief initiatives and charitable activities, carried out both at organisational level and through grassroots efforts by team members. These include, among others, charity collections, campaigns supporting selected social initiatives, and relief activities carried out in response to crisis situations, such as the support provided following the outbreak of war in Ukraine. These activities are further supported by internal initiatives that unite the team around shared social goals.

Team-building and family-oriented initiatives that support relationship-building and strengthen team bonds are also an important element of CloudFerro's organisational culture. These include company-wide events organised several times a year, regular team initiatives carried out under dedicated team-building budgets, and events aimed at the families of coworkers, including initiatives organised for Children's Day.

6.2 ESRS S4 – Consumers and end-users

6.2.1 Policy

Content and objectives: The Personal Data Protection Policy (POL-12) sets out the rules for processing the personal data of coworkers, customers and platform users in accordance with the GDPR, including security and data minimisation principles. Compliance with data protection requirements is overseen by the Data Protection Officer (DPO).

Scope: Users of the CREODIAS, WEkEO and Copernicus Data Space Ecosystem (CDSE) platforms, as well as institutional clients.

Reference to external standards: GDPR, ISO 27001, ISO 27018 (cloud data protection, from 2025).

6.2.2 Actions and metrics

One of the elements of the social dimension of CloudFerro's activities is supporting democratic access to satellite data and Earth observation technology. The company works to lower the technological barriers that hinder the use of satellite data by a broad range of users, including public institutions, the scientific community, environmental organisations and businesses.

Although Copernicus programme data is publicly available, its practical use was, for many years, hampered by technical complexity, differences in how data was catalogued, and limited interoperability between systems. As a

result, using Earth observation data required specialised knowledge and additional effort, which limited its wider uptake.

CloudFerro actively supports the development of modern standards that facilitate access to satellite data, in particular through the implementation of the STAC (SpatioTemporal Asset Catalogue) standard, which simplifies the discovery, organisation and use of geospatial data. Thanks to the use of a common standard, users can more easily find and analyse data from various sources, without having to overcome barriers arising from the technical complexity of individual systems.

CloudFerro took part in implementing this approach, including within the Copernicus Data Space Ecosystem (CDSE) as well as other Earth observation data platforms. These activities support greater availability of environmental data and enable its wider use for scientific research, climate change monitoring, environmental management, and more informed decision-making.

CloudFerro supports the democratisation of access to satellite data not only through the development of technological infrastructure, but also through educational activities and active participation in the international Earth observation ecosystem. In 2025, the company took part in numerous industry conferences, workshops and expert events covering topics including geospatial data, cloud technology, artificial intelligence, and the application of satellite data in public administration, science and business. These activities included presenting CloudFerro's technological solutions, as well as sharing expert knowledge, running educational sessions, participating in industry panels, and mentoring initiatives that support the development of technological skills.

6.2.3 Targets

Target	Indicator	2025	2026	2027	Scope
Democratic access to satellite data	Number of collections in the STAC catalogue	**312** ✓	**700**	**1,200**	Cumulative target; EO platforms
User data protection	GDPR breaches	**0**	**0**	**0**	EO platforms and CloudFerro services

CHAPTER 07

Governance



7.1 ESRS G1 – Business conduct

7.1.1 Policy

Policies and documents:

Code of Conduct (POL-13) – sets out the principles of fair business conduct, the prevention of discrimination, bullying and corruption, the protection of the company's interests, and the expected standards of behaviour towards colleagues, clients and business partners. The document is publicly available on the company's website.

Supplementary policies:

Sustainable Procurement Policy (POL-15) – sets out the principles of responsible cooperation with suppliers, including expectations regarding respect for human rights and environmental and ethical standards.

Personal Data Protection Policy (POL-12) – the primary document setting out the manner and principles of the processing of personal data by the Data Controller.

Information Security Policies (SEC-POL-01 to SEC-POL-10) – a set of 10 internal policies covering, among other things, information security management, asset management, access management, vulnerability management, network security, software development, and security incident management.

Scope: All coworkers in CloudFerro SA; key suppliers covered by the verification programme.

Availability: Code of Conduct – public (website); other policies – internal (intranet)

Responsibility: Management Board of CloudFerro SA (policy approval); ESG Committee, HR and Quality (implementation and monitoring).

7.1.2 Ethics and compliance

CloudFerro conducts its business on the basis of ethical and responsible business principles, treating regulatory compliance, transparency and a culture of accountability as important elements of its organisational governance. The primary document governing standards of conduct within the organisation is the Code of Conduct, which sets out the principles of fair business conduct, the prevention of discrimination, bullying and corruption, the protection of the company's interests, and the expected standards of behaviour towards colleagues, clients and business partners. This document is publicly available on the company's website, supporting transparency towards external stakeholders.

CloudFerro has formal mechanisms for reporting irregularities, comprising two separate channels:

Internal reporting channel (on an external platform) – implemented pursuant to the Whistleblower Protection Act of 14 June 2024. It enables a violation to be reported in writing, either anonymously or by name, and is aimed at all coworkers, former coworkers, as well as suppliers and consortium partners. A verbal reporting option is also available – a direct meeting with a member of the Ethics Committee, during which minutes are taken or a recording is made, according to the reporting person's preference. Reports are received by the Ethics Committee, which carries out an investigation and reports follow-up actions to the Management Board.

Public reporting channel (cloudferro.com/pl/zglaszanie-naruszen/) – also available to all external stakeholders. The link is published on the CloudFerro website.

Both channels ensure full confidentiality and protection of the reporting person's identity, regardless of the form of the report. The procedure does not require certainty that a violation has occurred – acting in good faith is sufficient.

Building organisational awareness through training covering, among other things, ethical principles, whistleblower protection and the prevention of undesirable behaviour in the workplace is also an important element of the compliance system.

In 2025, CloudFerro did not record any reports via the whistleblowing channels, nor any cases of ethical violations, corruption, discrimination or other irregularities.

7.1.3 Data protection, cybersecurity and responsible use of technology

Given the nature of its business, data protection, information security and cybersecurity are among the key areas of CloudFerro's organisational governance. The company manages technology infrastructure that supports the processing of large data sets, including data of high operational and business sensitivity, which requires the maintenance of mature organisational and technical security mechanisms.

CloudFerro has a comprehensive information security management system comprising policies and procedures governing, among other things, access management, network security, vulnerability management, security incident handling, backups and business continuity, secure software development, asset management, supplier security, and personal data protection. Compliance with personal data protection requirements is overseen by the Data Protection Officer.

The effectiveness of the security system is confirmed by certifications including **ISO 27001, ISO 9001, BSI C5 (attestation), BSI 200-1 (IT-Grundschutz)**, and, from 2025, also **ISO 27017 and ISO 27018**, which strengthen security standards for cloud services and the protection of data processed in cloud computing environments.

CloudFerro is also developing principles for the responsible use of new technologies, including artificial intelligence. The company has internal rules governing the safe and responsible use of AI tools (POL-18 AI Policy), covering requirements relating to information security, data protection, confidentiality, and the permitted scope of use of approved tools. The organisation also supports knowledge-sharing between teams regarding the practical and responsible use of AI technology.

In 2025, CloudFerro did not record any cybersecurity incidents, personal data breaches, or security incidents affecting customers.

7.1.4 Responsible supply chain

CloudFerro also takes into account the principles of sustainable development and responsible business conduct in its relationships with suppliers and business partners. This approach is governed by the Sustainable Procurement Policy (POL-15) and by supplier management procedures, which set out standards of cooperation and expectations for entities participating in the company's value chain.

CloudFerro expects suppliers to comply with basic ethical, social and environmental standards, including the prevention of discrimination, a ban on forced labour and child labour, respect for labour rights, the provision of safe working conditions, anti-corruption measures, and compliance with applicable environmental regulations. These expectations also extend to responsible practices applied by suppliers within their own supply chains.

As part of its management of supplier relationships, CloudFerro reserves the right to assess supplier compliance through self-assessments, reviews or other forms of verification, and, where non-compliance is identified, provides for corrective action and, in justified cases, termination of cooperation.

An important element of the company's approach is the gradual strengthening of sustainability requirements for business partners. In 2025, 100% of the key suppliers covered by the programme signed a declaration of compliance with CloudFerro's requirements regarding responsible environmental, social and ethical practices.

CloudFerro strives to build responsible, partnership-based relationships with suppliers, founded on transparent cooperation and the reliable settlement of obligations. In 2025, the company did not record any disputes relating to payments to suppliers.

7.1.5 Transparency and responsible management

CloudFerro is developing its approach to sustainable development on the basis of transparency, accountability and dialogue with stakeholders. The publication of its first ESG report is part of building a more formal and structured approach to managing environmental and social impact and organisational governance.

The preparation of the report was a voluntary undertaking, arising both from the company's internal approach to responsible business conduct and from the growing expectations of clients, business partners and investors regarding the transparency of ESG data and sustainability information.

CloudFerro's approach to transparency also includes making selected policies and organisational documents publicly available, including the Code of Conduct and the violation reporting mechanism, which helps build trust and transparent relationships with stakeholders.

CloudFerro views ESG reporting not as a one-off initiative but as an element of the organisation's long-term development, supporting more informed management of the risks, opportunities and impact of the company's operations.

7.1.6 Political influence and lobbying activities (G1-2)

CloudFerro SA does not engage in lobbying activities or take any action aimed at influencing legislative processes or the decisions of public authorities in the company's interest. The Company is not a member of any industry organisations or associations whose main purpose is to influence public policy. CloudFerro does not fund political parties or election campaigns.

7.1.7 Targets

Target	Indicator	2025	2026	2027	Scope / methodology
Promoting an ethical culture	% of coworkers trained on the Code of Conduct	**89%**	**100%**	**100%**	All coworkers
Cooperation with responsible suppliers	% of key suppliers with an ESG declaration	**100% ✓**	**100%**	**100%**	Supply chain
Improving the EcoVadis rating	Year-on-year increase in EcoVadis score	**55**	**+5–10%**	**+5–10%**	Base year 2025: 55 points / Committed
Extending security certification	Obtaining ISO 27017 and 27018	**Yes ✓**	**Maintain**	**Maintain**	ISO certifications

✓ = target achieved in 2025

7.1.8 Metrics

G1 indicator	2024	2025
Ethical breaches	0	**0**
Reports via the whistleblowing channel	0	**0**
Corruption cases	0	**0**
Discrimination / bullying cases	0	**0**
GDPR breaches / personal data incidents	0	**0**
Cybersecurity incidents	0	**0**
Payment disputes with suppliers	0	**0**
Key suppliers with an ESG declaration	0%	**100%**
% of coworkers trained in ethics	0%	**89%**
EcoVadis rating	n/a	**55 pts / Committed**
Public Code of Conduct	Yes	**Yes**
Public whistleblowing channel	Yes	**Yes**

CHAPTER 08

Outlook and future commitments



We regard sustainable development as an integral part of our long-term business strategy, rather than as a separate area of activity. The organisation's continued development will be based on combining technological innovation with a responsible approach to its environmental and social impacts and governance principles.

8.1 Directions for infrastructure and technology development

We will continue to develop our cloud infrastructure and data processing technologies, with quality, security and energy efficiency as the key criteria for investment decisions. We plan to further modernise and optimise our IT infrastructure portfolio, including the gradual phasing out of locations with lower energy efficiency in favour of modern, energy-efficient data centres. Infrastructure development will also include the continued implementation of multi-site architectures, ensuring high availability and resilience of services.

We will also continue to invest in technologies supporting democratic access to satellite data, including the expansion of the STAC catalogue and the development of platforms such as CREODIAS, WEkEO and the Copernicus Data Space Ecosystem (CDSE). We also intend to remain actively involved in European initiatives in the fields of space technology, Earth observation and data infrastructure, strengthening our contribution to building European digital sovereignty.

8.2 Environmental plans

In the environmental area, we intend to continue developing a more systematic approach to managing our environmental impact, covering both the achievement of the objectives set out in the ESG Strategy and the further strengthening of environmental management processes. One of the planned directions is the implementation of an environmental management system compliant with the requirements of ISO 14001.

We will continue optimisation activities in the area of IT infrastructure energy efficiency, working towards further targets: a W/TB ratio of 0.90 by 2026 and 0.86 by 2027. The Company also plans to expand the scope of monitoring of GHG emissions and environmental data in subsequent reporting years.

A significant element of CloudFerro's development also remains the continued support of projects related to environmental monitoring, climate research and the use of Earth observation data in efforts towards more informed resource management and response to environmental challenges.

8.3 Social plans and competence development

We also plan to continue investing in the development of our team's competences, treating coworkers' knowledge and skills as an important element of competitive advantage and service quality. We intend to continue activities supporting the development of technical, managerial and digital competences, including those related to the use of new technologies. A further important element will be the continued development of the Engaging Leader Academy and the implementation of individual development plans for coworkers.

In the social area, we will continue efforts to build a fair and inclusive workplace, including addressing the gender pay gap and developing a transparent remuneration policy. We also intend to expand the scope of HR metrics monitoring, including a breakdown of training hours by gender and role, which will be reflected in future annual reports.

We also intend to continue activities supporting the democratisation of access to satellite data and the development of technological solutions that facilitate their practical use by a broad range of users. We will update the ESG Strategy once its current time horizon (2027) has elapsed, taking into account the results of subsequent materiality assessments and stakeholder expectations.

We assume that the organisation's continued development will be based on combining technological innovation with a responsible approach to environmental and social impacts and governance principles, treating sustainable development as an integral element of building long-term value.

CHAPTER 09

Key ESG indicators

The table below presents CloudFerro SA's key ESG indicators for 2025, together with comparative data for 2024 where available. Full disclosures, including methodology and context, are provided in the thematic chapters of this report.

9.1 Environmental indicators

Indicator	Standard	2024	2025
Greenhouse gas emissions (E1)			
Total emissions [tCO_2eq]	E1-2	11,602.4	**19,278.7**
Scope 1 [tCO_2eq]	E1-2	20.5	**404.8**
Scope 2 market-based [tCO_2eq]	E1-2	75.3	**35.6**
Scope 2 location-based [tCO_2eq]	E1-2	8,483.6	**7,977.6**
Scope 3 [tCO_2eq]	E1-2	11,506.5	**18,838.3**
Energy (E1)			
Electricity consumption [MWh]	E1-1	12,650.4	**14,461.6**
Energy from renewable sources [%]	E1-1	99.4%	**100%**
Energy efficiency [W/TB]	E1-1	0.97	**0.94**
PUE indicator (range)	E1-1	1.20-1.65	**1.18 – 1.57**
Pollution – F-gases (E2, voluntary)			
Refrigerant emissions [tCO_2eq]	E2 voluntary	0	**387.5**
Water resources (E3, voluntary)			
Process water consumption [m^3]	E3 voluntary	0	**0**
Waste management (E5, voluntary)			
WEEE [kg]	E5 voluntary	313.1	**252.9**
Plastics [kg]	E5 voluntary	2,361.7	**578.8**
Paper and cardboard [kg]	E5 voluntary	40,388.0	**3,133.0**
Mixed waste [kg]	E5 voluntary	9,208.0	**7,992.0**

Indicator	Standard	2024	2025
Hazardous waste [kg]	E5 voluntary	0	**0**
Total waste [kg]	E5 voluntary	16,283.8	**11,890.1**

9.2 Social indicators

Indicator	Standard	2024	2025
Employment (S1-1)			
Employees on payroll – total	S1-1	114	**142**
Employees on payroll – women	S1-1	37 (32%)	**46 (32%)**
Employees on payroll – men	S1-1	77 (68%)	**96 (68%)**
Permanent contracts	S1-1	109 (96%)	**127 (89%)**
Fixed-term contracts	S1-1	5 (4%)	**15 (11%)**
Full-time	S1-1	111 (97%)	**139 (98%)**
Part-time	S1-1	3 (3%)	**3 (2%)**
B2B coworkers and coworkers under mandate contracts – total	S1-2	158	**175**
Total workforce (employees + B2B coworkers/mandate contracts)	—	272	**317**
Diversity (S1-10)			
Women in management	S1-10	33% (10/30)	**29% (11/38)**
Women on the Management Board	S1-10	0% (0/4)	**0% (0/4)**
Women on the Supervisory Board	S1-10	33% (2/6)	**33% (2/6)**
Remuneration (S1-4, S1-8)			
Lowest remuneration [PLN gross/month]	S1-4	5,000	**5,250**
Minimum wage in Poland [PLN gross/month]	S1-4	4,300	**4,666**
Ratio of lowest remuneration to minimum wage	S1-4	116%	**112%**
Unadjusted gender pay gap (women vs men)	S1-8	16.3%	**15.9%**
Adjusted pay gap after grading	S1-8	7.1%	**8.1%**
Training and development (S1-6, voluntary)			
Total number of training hours	S1-6	4,106	**3,273**
Coworkers covered by training	S1-6	162	**216**
Average training hours per person	S1-6	17	**11**

Indicator	Standard	2024	2025
Managers in the Engaging Leader Academy	S1-6	n/a	**95%**
eNPS	—	12	**14**
Workplace accidents	S1-7	0	**0**
Occupational diseases	S1-7	0	**0**
TRIR accident rate	S1-7	0.0	**0.0**
Hours worked	S1-7	182,300	**218,300**
Consumers (S4)			
GDPR breaches	S4	0	**0**
Number of collections in the STAC catalogue	S4	**0**	**312**

9.3 Corporate governance indicators

Indicator	Standard	2024	2025
Ethics and compliance (G1)			
Ethics violations	G1	0	**0**
Whistleblowing reports	G1	0	**0**
Cases of corruption	G1	0	**0**
Cases of discrimination / bullying	G1	0	**0**
Formal employee complaints	S1-9	0	**0**
Cybersecurity incidents	G1	0	**0**
GDPR breaches / personal data incidents	G1	0	**0**
Disputes with suppliers regarding payments	G1	0	**0**
Governance and certifications (G1)			
Key suppliers with an ESG declaration	G1	n/a	**100%**
% of coworkers trained on ethics	G1	n/a	**89%**
EcoVadis score	G1	n/a	**55 pts / Committed**
Public Code of Conduct	G1	No	**Yes**
Public whistleblowing channel	G1	Yes	**Yes**
ISO certifications (maintained)	G1	ISO 27001, BSI C5, BSI 200-1	**+ ISO 27017, 27018**

Full disclosures, including methodology, context and references to the ESRS LSME standards, are provided in Chapters 5–8 of this report.

APPENDICES A · B · C

Appendices

Annex A – Table IR-2: List of ESRS LSME Disclosure Requirements

The table below lists all Disclosure Requirements covered or omitted in this report, in accordance with Disclosure Requirement DR 10 (IR-2) of ESRS LSME. The status and location in the report are indicated for each requirement.

DR / Standard	Name of disclosure requirement	Status	Location in the report
SECTION 2 – General Disclosures			
BP-1 (DR 1)	General basis for preparation of the report	✓ **Covered**	Methodology (Methodology chapter)
BP-2 (DR 2)	Disclosures in relation to specific circumstances	✓ **Covered**	Methodology
GOV-1 (DR 3)	Role of the administrative, management and supervisory bodies	✓ **Covered**	Chapter 2.1, 2.2
GOV-2 (DR 4)	Due diligence	✓ **Covered**	Chapter 2.4
SBM-1 (DR 5)	Strategy, business model and value chain	✓ **Covered**	Chapter 3.1, 3.2, 3.4
SBM-3 (DR 7)	Link between material IROs and strategy	✓ **Covered**	Chapter 3.3
IR-1 (DR 9)	DMA methodology and material topics	✓ **Covered**	Chapter 4.1, 4.2, 4.3, 4.4
IR-2 (DR 10)	List of disclosure requirements	✓ **Covered**	Annex A (this annex)
SECTION 3 – Policies, Actions and Targets			
IR-3 (DR 11)	Policies for material topics	✓ **Covered**	Chapters 5–8 (Policy section per topic)
IR-4 (DR 12)	Targets and actions for material topics	✓ **Covered**	Chapters 5–8 (Actions and Targets sections per topic)
SECTION 4 – Environmental Information			
E1-1	Energy consumption and energy mix	✓ **Covered**	Chapter 5.1 (E1 Metrics)
E1-2	GHG emissions Scope 1, 2, 3	✓ **Covered**	Chapter 5.1 (E1 Metrics), Chapter 9.1
E2	Pollution – F-gases	**Voluntary**	Chapter 5.2
E3	Water resources	**Voluntary**	Chapter 5.3
E4	Biodiversity and ecosystems	✓ **Covered**	Chapter 5.4
E5	Circular economy and waste	**Voluntary**	Chapter 5.5

DR / Standard	Name of disclosure requirement	Status	Location in the report
E6	Anticipated financial effects of environmental risks	**Phase-in**	Described qualitatively (Ph-in 3, Appendix C)
SECTION 5 – Social Information			
S1-1	Characteristics of employees	✓ **Covered**	Chapter 6.1, Chapter 9.2
S1-2	Characteristics of non-employee workers (B2B coworkers/coworkers under mandate contracts)	✓ **Covered**	Chapter 6.1 (voluntary – phase-in year 1)
S1-3	Collective bargaining agreements and social dialogue	✓ **Covered**	Chapter 6.1
S1-4	Adequate wages	✓ **Covered**	Chapter 6.1, Chapter 9.2
S1-6	Training metrics	**Phase-in**	Data incomplete (no breakdown of training hours by gender)
S1-7	Health and safety metrics	✓ **Covered**	Chapter 6.1, Chapter 9.2
S1-8	Gender pay gap	✓ **Covered**	Chapter 6.1, Chapter 9.2
S1-8	Remuneration of the highest-paid individual vs. the median	**Omitted**	Data not available in the first reporting year
S1-9	Incidents and violations of human rights	✓ **Covered**	Chapter 6.1
S1-10	Diversity	✓ **Covered**	Chapter 6.1, Chapter 9.2
S4	Consumers and end-users	✓ **Covered**	Chapter 6.2
SECTION 6 – Governance Information			
G1-1	Business ethics, compliance and code of conduct	✓ **Covered**	Chapter 7.1.1
G1-2	Political influence and lobbying	✓ **Covered**	Chapter 7.1.5

Status	Meaning
✓ **Covered**	Requirement covered by the report in accordance with the DMA findings and the requirements of ESRS LSME
Voluntary	Voluntary disclosure – topic not material according to the DMA, but data disclosed on the company's own initiative
Phase-in	Omitted under the transitional provision (Phase-in) – will be covered in future years
Omitted	Omitted – data not available in the first reporting year, or topic not material

Annex B – GHG Emissions Calculation Methodology

This annex describes the methodology used by CloudFerro SA to calculate and report greenhouse gas (GHG) emissions for 2024 and 2025.

B.1 Methodological basis

GHG emissions calculations are carried out in accordance with the **GHG Protocol Corporate Accounting and Reporting Standard** and the **ISO 14064-1** standard. Data collection, calculation and reporting are performed using the **Envirly** platform, certified by the independent auditing body **TÜV NORD**. The platform is recertified annually.

The report covers GHG emissions in three scopes:

- **Scope 1** – direct emissions from sources owned or controlled by CloudFerro SA, including emissions of refrigerants (F-gases).
- **Scope 2** – indirect energy emissions. Reported using two methods: market-based (taking into account guarantees of origin for energy from renewable sources) and location-based (national emission factors).
- **Scope 3** – other indirect emissions across the value chain.

B.2 Calculation methods

Scope 1 and Scope 2 – calculated using the precise quantitative estimation method based on invoice data. The exception is the Frankfurt data centre, where energy data is obtained from cost invoices.

Scope 3 – calculated using the spend-based method for categories 1 and 2 (purchased goods, services and capital goods) and the precise estimation method for categories 5, 6 and 7. CloudFerro plans a gradual transition to a hybrid method in subsequent reporting years.

All emissions are converted into CO_2 equivalent (tCO_2eq) using GWP factors consistent with IPCC assessment reports.

B.3 Reporting boundaries and assumptions

- **Organisational boundary:** an operational control approach – the report covers only the activities of CloudFerro SA. Urbetho CF GmbH is not included.
- **Reporting period:** calendar year (1 January – 31 December).
- **Base year:** 2023 – the first year in which CloudFerro SA reported its emissions.
- **Gases covered by the report:** CO2, CH4, N2O, HFC, PFC, SF6, NF3 – in accordance with UNFCCC/Kyoto Protocol requirements.

B.4 Emission factors applied in the 2025 calculations

The table below sets out the emission factors applied by the Envirly platform in the 2025 calculations.

Emission category	Factor	Source
Scope 1 – Direct emissions		
Natural gas (stationary combustion)	**0.2027 kgCO2eq/kWh**	DEFRA 2025, Fuels, Gaseous fuels, Natural Gas
Diesel (vehicles)	**2.5708 kgCO2eq/litre**	DEFRA 2025, Fuels, Liquid fuels, Diesel (average biofuel blend)
Petrol (vehicles)	**2.0692 kgCO2eq/litre**	DEFRA 2025, Fuels, Liquid fuels, Petrol (average biofuel blend)
HFC-32 (refrigerant)	**677 kgCO2eq/kg**	DEFRA 2025, Kyoto protocol products

Emission category	Factor	Source
HFC-125 (refrigerant)	**3,170 kgCO2eq/kg**	DEFRA 2025, Kyoto protocol products
HFC-134a (refrigerant)	**1,300 kgCO2eq/kg**	DEFRA 2025, Kyoto protocol products
Scope 2 – Energy		
Electricity (market-based, renewables)	**0 kgCO2eq/kWh**	AIB 2024, Residual mix (100% renewables with certificates)
Electricity (location-based, Poland)	**0.553 kgCO2eq/kWh**	KOBiZE – CO2 emission factor for 2024
Heat (Fabryczna office)	**98.889 kgCO2eq/GJ**	URE 2024
Scope 3 – Indirect emissions		
Purchased goods and services (Cat. 1)	**Various factors by product category**	World Input-Output Database
Capital goods (Cat. 2)	**0.2074 kgCO2eq/PLN (electrical equipment)**	World Input-Output Database
WEEE waste (Cat. 5)	**0.00469 kgCO2eq/kg**	DEFRA 2025, Waste disposal, WEEE - mixed
Mixed waste (Cat. 5)	**0.4972 kgCO2eq/kg**	DEFRA 2025, Waste disposal, Household residual waste
Paper and cardboard (Cat. 5)	**1.1645 kgCO2eq/kg**	DEFRA 2025, Paper and board: mixed
Business travel – short-haul flights (Cat. 6)	**0.12576 kgCO2eq/passenger-km**	DEFRA 2025, Business travel - air, Short-haul, Economy class
Business travel – long-haul flights (Cat. 6)	**0.11704 kgCO2eq/passenger-km**	DEFRA 2025, Business travel - air, Long-haul, Economy class
Business travel – rail (Cat. 6)	**0.03546 kgCO2eq/passenger-km**	DEFRA 2025, Business travel - land, Rail, National rail
Commuting – diesel car (Cat. 7)	**0.17304 kgCO2eq/km**	DEFRA 2025, Business travel - land, Cars, Average car, Diesel
Commuting – petrol car (Cat. 7)	**0.16272 kgCO2eq/km**	DEFRA 2025, Business travel - land, Cars, Average car, Petrol
Remote work – home office (Cat. 7)	**0.33378 kgCO2eq/day**	DEFRA 2025

Full documentation of the GHG emissions calculations is contained in the reports "Greenhouse Gas Emissions Report of CloudFerro SA" for 2023, 2024 and 2025, available on the CloudFerro SA website under the Sustainability section.

Annex C – Glossary of terms and abbreviations

This glossary explains the key terms and abbreviations used in the 2025 ESG report of CloudFerro SA.

C.1 Glossary of terms

Term	Definition
Biodiversity	The variety of life on Earth at the genetic, species and ecosystem levels. In an ESG context, the impact of a company's activities on habitats and species is assessed.
CDP (Carbon Disclosure Project)	An international non-profit organisation running a global system for the disclosure of environmental information by companies, cities and governments.
Circular economy	An economic model that seeks to extend the useful life of products and raw materials through reuse, repair and recycling, in order to minimise waste.
Coworkers	In this report, the term "coworkers" is used in a broad sense and refers to all persons working with CloudFerro SA, regardless of their form of engagement – encompassing both employees and individuals working under B2B contracts or mandate contracts. Where data or information relates exclusively to a specific group, this is explicitly indicated (e.g. "employees", "B2B coworkers and coworkers under mandate contracts")
Data Centre (DC)	A technical infrastructure facility used for storing, processing and distributing data. CloudFerro operates data centres in a number of locations across Europe.
Double Materiality Assessment (DMA)	The process of identifying and assessing the materiality of ESG topics from two perspectives: the impact of the company's activities on the environment and society (impact materiality) and the impact of ESG factors on the company's financial position (financial materiality).
Downstream	In the context of the value chain: the stages following the organisation's own operations, including distribution, sales, product use by customers and end-of-life (recycling, disposal). The term is used in accordance with the GHG Protocol (Scope 3) methodology.
Due diligence	The process of identifying, assessing and managing actual and potential adverse impacts on people and the environment within the company's own operations and its value chain.
EcoVadis	A sustainability assessment platform for supply chains. It awards companies scores and medals (Committed, Silver, Gold, Platinum) based on their ESG policies, actions and performance.
eNPS (Employee Net Promoter Score)	An coworker engagement indicator measured by the question: “How likely are you to recommend CloudFerro as an employer?”. Values range from −50 to +100; a score above 10 is considered good.
EO (Earth Observation)	The collection of data about the Earth using satellites, aircraft and other platforms. EO data is a key element of CloudFerro's platform activities.
ESRS (European Sustainability Reporting Standards)	The European Sustainability Reporting Standards, developed by EFRAG on the basis of the CSRD directive. ESRS LSME is a simplified version intended for listed small and medium-sized enterprises.
GDPR	The General Data Protection Regulation (Polish: RODO) – an EU regulation setting out the rules for the processing of personal data.
Gender pay gap	The difference between the average or median pay of women and men, expressed as a percentage of men's pay. The unadjusted gap does not take positions or experience into account; the adjusted gap allows for these factors.
GHG (Greenhouse Gas)	A greenhouse gas – a substance that absorbs infrared radiation in the atmosphere and contributes to the greenhouse effect. It includes CO2, CH4, N2O, HFC, PFC and SF6, among others.

Term	Definition
GHG Protocol	An international accounting and reporting standard for GHG emissions, developed by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD). It forms the methodological basis of CloudFerro's GHG report.
GWP (Global Warming Potential)	Global warming potential – an indicator describing the effect of a given greenhouse gas on climate warming relative to CO2 (GWP of CO2 = 1) over a 100-year horizon.
IRO (Impacts, Risks and Opportunities)	Impacts, risks and opportunities – a key ESRS concept defining the areas in which a company's activities interact with ESG issues.
ISO 14064-1	An international standard setting out the principles and requirements for the quantification and reporting of GHG emissions and removals at the organisational level.
ISO 27001	An international standard setting out the requirements for information security management systems (ISMS).
ISO 27017 / 27018	International standards covering the security of cloud services (27017) and the protection of personal data in the cloud (27018). CloudFerro obtained both certifications in 2025.
Phase-in (transitional provision)	A temporary exemption from the obligation to disclose certain information, provided for in ESRS LSME for the first reporting years, allowing for gradual alignment with the requirements of the standard.
PUE (Power Usage Effectiveness)	An indicator of a data centre's energy efficiency: the ratio of the total energy consumed by the DC to the energy consumed by the IT infrastructure alone. An ideal PUE = 1.0.
Refrigerant (F-gas)	Fluorinated greenhouse gases used in cooling systems. They are characterised by a very high global warming potential (GWP). F-gas emissions are included in Scope 1.
Renewable energy sources (RES)	Energy derived from naturally replenished sources: solar, wind, hydro, geothermal and biomass. CloudFerro sources 100% of its electricity from renewable sources.
Scope 1	Direct GHG emissions from sources owned or controlled by the company (e.g. fuel combustion, refrigerant emissions).
Scope 2	Indirect GHG emissions associated with the purchase of electricity, heat or cooling. Reported using two methods: market-based (taking into account guarantees of origin) and location-based (national emission factors).
Scope 3	All other indirect GHG emissions in the company's value chain, both upstream (e.g. the production of purchased equipment) and downstream (e.g. coworkers commuting).
STAC (SpatioTemporal Asset Catalogue)	An open standard for cataloguing geospatial and satellite data, making it easier to search for and use. CloudFerro is implementing STAC across its EO platforms.
tCO2eq (tonnes of CO2 equivalent)	A unit of measurement for greenhouse gas emissions that takes into account the different GWP of individual gases and converts them into CO2 equivalent.
TRIR (Total Recordable Incident Rate)	An accident-rate indicator: the number of recordable incidents per 200,000 hours worked. TRIR = (number of incidents × 200,000) / hours worked.
Upstream	In the context of the value chain: the stages preceding the organisation's own operations, including the sourcing of raw materials, production at suppliers and the transport of materials to the company. The term is used in accordance with the GHG Protocol methodology (Scope 3)
Value chain	All the activities and entities involved in creating, delivering and supporting the company's products or services. It includes suppliers (upstream) and customers (downstream).

C.2 Abbreviations

Abbreviation	Full name
AI	Artificial Intelligence
BDO	Database on products, packaging and waste management (Baza Danych o Odpadach) – the Polish registration database)
BSI C5	Bundesamt für Sicherheit in der Informationstechnik Cloud Computing Compliance Criteria Catalogue – German cloud security standard
CDSE	Copernicus Data Space Ecosystem – the EU Copernicus programme's satellite data platform
CREODIAS	Cloud Ready Earth Observation Data and Information Access Services – an EO data platform operated by CloudFerro
CSRD	Corporate Sustainability Reporting Directive – EU directive on sustainability reporting
DACH	Germany (Deutschland), Austria, Switzerland (Confœderatio Helvetica) – the region in which Urbetho CF GmbH operates
DC	Data Centre
DLR	Deutsches Zentrum für Luft- und Raumfahrt – the German Aerospace Centre
DMA	Double Materiality Assessment
DPO	Data Protection Officer (Inspektor Ochrony Danych)
DR	Disclosure Requirement – a disclosure requirement under the ESRS standard
ECMWF	European Centre for Medium-Range Weather Forecasts
EFRAG	European Financial Reporting Advisory Group – the EU advisory body that develops the ESRS standards
eNPS	Employee Net Promoter Score – a coworkers engagement indicator
EO	Earth Observation
ESA	European Space Agency
ESG	Environmental, Social, Governance
ESRS	European Sustainability Reporting Standards
ESRS LSME	ESRS for listed small and medium-sized enterprises (Listed Small and Medium-sized Enterprises)
EUMETSAT	European Organisation for the Exploitation of Meteorological Satellites
F-gases	Fluorinated greenhouse gases used, among other things, in cooling systems
FTE	Full-Time Equivalent
GDPR	General Data Protection Regulation (RODO in Polish)
GHG	Greenhouse Gas

Abbreviation	Full name
GWP	Global Warming Potential
HR	Human Resources
IRO	Impacts, Risks and Opportunities
ISO	International Organization for Standardization
IT	Information Technology
KBA	Key Biodiversity Area
KOBiZE	National Centre for Emissions Management (Krajowy Ośrodek Bilansowania i Zarządzania Emisjami) –the Polish GHG emissions register
KPI	Key Performance Indicator
LSME	Listed Small and Medium-sized Enterprises
MWh	Megawatt-hour – a unit of energy (1 MWh = 1,000 kWh)
OHS	Occupational Health and Safety
POL	CloudFerro internal policy (e.g. POL-13 = Code of Conduct)
PUE	Power Usage Effectiveness – a data centre energy efficiency indicator
RES	Renewable Energy Sources
RODO	General Data Protection Regulation (GDPR)
SB	Supervisory Board
SBM	Strategy, Business Model and Value Chain (ESRS section)
SEC-POL	CloudFerro information security policy (e.g. SEC-POL-01 = Information Security Policy)
STAC	SpatioTemporal Asset Catalogue – a standard for cataloguing geospatial data
TB	Terabyte – a unit of data capacity (1 TB = 1,000 GB)
tCO_2eq	Tonnes of CO_2 equivalent – a unit of measurement for GHG emissions
TRIR	Total Recordable Incident Rate – an incident/accident rate indicator
TÜV NORD	Technischer Überwachungsverein Nord – an independent certification and verification body
W/TB	Watts per terabyte – an IT infrastructure energy efficiency indicator
WEEE	Waste Electrical and Electronic Equipment (e-waste)
WEkEO	An Earth observation data platform supporting the Copernicus services, operated among others by CloudFerro