



ESG REPORT

ENVIRONMENTAL, SOCIAL & GOVERNANCE

XpFibre Group's CSR approach is part of a **continuous improvement process and aims to create sustainable value.**

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Introduction

Through its activities in designing, building, operating, and maintaining the fiber optic network, XpFibre plays a **key role** in the digital development of the territory. Its neutral and open network constitutes a strategic infrastructure for local authorities, commercial operators, businesses, and households.

This report formalizes **the Group's environmental, social, and governance approach**. It is aligned with **the European CSRD** (Corporate Sustainability Reporting Directive). It reflects a clear ambition: to report with rigor, transparency, and clarity on **the issues inherent to our activity, on the Group's ambitions and actions, and on the governance mechanisms implemented**.

XpFibre thus aims to provide all its stakeholders, local authorities, investors, commercial partners, public authorities, and users, with a document that is readable, factual, and representative of **its commitment**.

Foreword



Over the past six years, the rollout of fiber optic networks across France has represented a major industrial challenge.

*The fiber network, now almost fully deployed, has required strong engineering expertise, strict operational organization, a strong service oriented culture, and a solid local presence alongside local authorities and end users. XpFibre's strategy is now shifting toward a **sustainable and efficient maintenance model for its infrastructures**.*

*In this context, XpFibre has chosen to pair this strategy with a structured environmental, social, and governance approach. This dimension reflects a **commitment to responsibility, transparency, and continuous improvement**. It also expresses our conviction that the quality of service delivered to our territories relies on sound, **sustainability, and exemplary management** of our operations and our network.*

This first report marks an important milestone. It establishes solid foundations:

- *the identification of our material issues,*
- *the structuring of our governance,*
- *the definition of our key action areas,*
- *the presentation of concrete projects already implemented.*



Lionel Recorbet,
CEO of XpFibre Group

A nighttime photograph of a modern city street. On the left, a large building with a glass facade is illuminated with blue and white lights. A pedestrian bridge with a blue metal railing extends from the building over the street. The street is filled with light trails from cars, creating a sense of motion. In the background, other skyscrapers are visible, some with warm orange lights. The overall scene is a vibrant, high-tech urban environment.

3.

About XpFibre Group

XpFibre in a few words

XpFibre is an **infrastructure operator dedicated to fiber optic networks**, operating at the national level to support the digital development of French territories. XpFibre specializes in **the design, construction, and operation of telecommunications networks and infrastructures** for local authorities.

The Group operates in **AMII zones** (Call for Expression of Investment Intent) and **AMEL zones** (Call for Local Commitments) as part of privately funded deployments. XpFibre also operates in **RIP zones**, within the framework of Public Service Delegations (DSP) or through Public Private Partnerships supporting digital development projects initiated by local authorities.

The fiber optic network deployed by XpFibre is neutral, shared, and open to all operators. This neutrality ensures **fair treatment among commercial operators** and contributes to stimulating connectivity offerings for both households and businesses. Individuals and companies alike can subscribe with the service provider of their choice.

Fully committed to supporting territorial digital development, XpFibre's teams work daily in the field to extend the reach of its network.

XpFibre ensures deployment, operation, and wholesale commercialization of **more than 7,4 million fiber optic connections** across all areas under its commitments: AMII, AMEL, and RIP zones.

As of December 31, 2025, the Group employs 233 permanent staff (excluding probationary periods), located throughout the territory (Mainland France, Corsica and DROM¹). Internal teams cover **the strategic, technical, and operational functions** required for network deployment and management, including:

- Supervision and coordination of operations,
- Definition of technical standards,
- Performance monitoring,
- Contractual and operational management of partnerships.

About XpFibre Group

Although XpFibre is relatively small in terms of workforce, it operates one of the largest fiber networks on the market, thanks to an organization built on the complementarity between internal resources and specialized subcontracting.

To conduct its activities, XpFibre relies on **a structured ecosystem** of technical service providers throughout the subcontracting chain. These partners intervene across three key stages of the fiber optic lifecycle: **deployment, commercialization, and operation.**

These operations may be carried out under private contracts or Public Service Delegations (DSP) when XpFibre operates or manages networks on behalf of local authorities. Subsequently, the maintenance of the networks highlights the importance of subcontracting and involves a clear distinction in the Group's greenhouse gas emission boundaries, as explained in section 7 Carbon Footprint (Scopes 1, 2, and 3).



SCOPE AND OPERATIONAL FOOTPRINT: KEY FIGURES



21

Public Initiative Networks,
deployed as part of Public Service
Delegations



5

AMEL zones (Local Commitment Call applications
funded with own resources) and
3 proprietary networks



7,4

outlets deployed



4,4

clients connected to fiber

History : creation of the Group

In March 2019, Altice finalized the creation of SFR FTTH, a major milestone for the future of Very High Speed Broadband deployment in France. SFR FTTH also opened its capital to infrastructure funds from the French group Axa, the German group Allianz, and the Canadian fund OMERS.

Altice France remained the majority shareholder of SFR FTTH, which **became XpFibre on March 30, 2021**. In September 2021, XpFibre completed the acquisition of Covage.

The newly combined entity, bringing together the assets of XpFibre and those acquired from Covage, gave rise to an even more ambitious player in fiber deployment across French territories, and to a key partner for commercial operators.

A pair of hands is shown holding a small, clear glass globe. Inside the globe, a small green plant with several leaves is growing out of a layer of dark brown soil. The hands are positioned to support the globe from below and the sides. The background is a soft, out-of-focus green, suggesting an outdoor setting. The overall image conveys a message of environmental care and sustainability.

4.

**ESG at
XpFibre**

Optic fiber : how it works

NETWORK DEPLOYMENT

Over the past several years, XpFibre has led one of **the most ambitious fiber deployment programs** in the country, with the objective of providing **Very High Speed connectivity** to as many users as possible.

This large scale rollout has mobilized numerous stakeholders, internal teams, industrial partners, and local authorities, to build a reliable, resilient, and durable network.

Today, the infrastructure deployment phase is almost fully completed, covering nearly all planned areas: rural, peri urban, and urban zones. It has involved :

- **The construction** of Optical Connection Nodes (NRO),
- **The installation** of kilometers of aerial and underground cables,
- **The deployment** of Mutualisation Points (PM),
- **The creation** of thousands of optical lines ready to be connected (at the PBO level).

This highly structuring phase forms **the foundation of the fiber network**. It is also the stage where **environmental impact is most concentrated**, due to construction activities, civil engineering works, and material use. However, this impact is non recurring once infrastructures are installed, the need for heavy interventions decreases significantly, giving way to operations mainly focused on preventive and corrective maintenance.

XpFibre is therefore entering a mature operational phase, in which priorities progressively shift toward **service quality, reliability, and the optimization of lower carbon operational processes** made possible by passive infrastructure.

CONNECTION

Once the infrastructure is deployed, the next step is **the connection of end users**, households, businesses, or public sites.

Today, this stage is one of the main operational contributors to greenhouse gas emissions, due to the travel required by technicians to perform the connection.

Furthermore, connection activities, like deployment-related activities, are expected to gradually decline with the shutdown of the copper local loop by January 2031, thereafter, representing only a marginal share of operations.

A connection systematically involves technicians travelling on site to carry out:

- Home or on premises **interventions**,
- Optical splicing **operations**,
- An **installation** of the final drop cables between the branching point and the user's premises,
- Signal quality **checks and testing**.

These trips represent a tangible share of **direct emissions (Scope 1)** for XpFibre's own field auditors, or **indirect emissions (Scope 3)** for technicians belonging to the subcontracting chain.

For XpFibre, **connection operations require very few raw materials**. Most fiber network infrastructures (transport and distribution cables, ducts, chambers, cabinets, and poles) were already deployed during the initial construction phase.

As a result, today's connections rely almost entirely on existing infrastructure. Only small quantities of drop cables and a limited number of technical components (connectors, patch cords, accessories) are needed.

This model results in:

- Low material intensity,
- Reduced environmental impact,
- Emissions primarily linked to travel and subcontractor interventions rather than material use.

MAINTENANCE

Ensuring complete maintenance management: **a key factor for continuity, service quality, and environmental performance.**

After deployment and connection, network operation relies on a third key pillar: **maintenance.**

XpFibre, supported by its subcontractors, ensures comprehensive management of the fiber network, from infrastructure supervision to on site interventions.

This activity includes:

- Preventive maintenance (infrastructure inspections, checks on active and passive equipment, optical cleaning),
- Corrective maintenance in the event of faults,
- Management of incidents related to weather events, degradation, or third party accidents,
- Securing of intervention zones, especially when sites are sensitive or critical.

As with connection activities, maintenance requires regular technician travel, which generates the remaining carbon emissions linked to network operations.

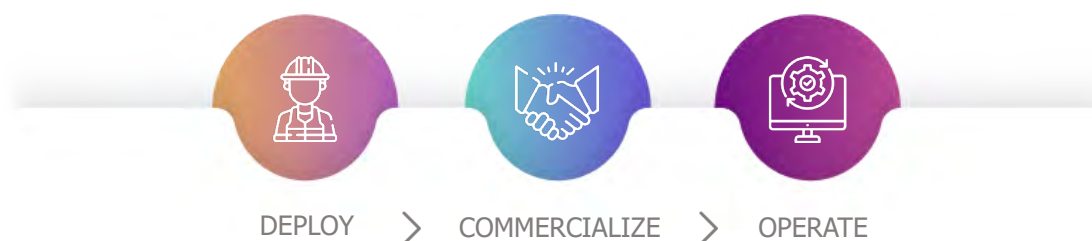
Beyond carbon emissions, maintenance also addresses **safety concerns** for both employees and users:

- Securing intervention areas,
- Managing interventions in regulated zones (e.g., ABF areas, industrial sites, roadways),
- Traceability and responsible management of replaced equipment.

Infrastructure operator activity inherently carries general and ESG related challenges, both technological and societal. These challenges are closely tied to our fields of expertise: civil engineering, network management, continuous operations, field interventions, and relations with local authorities to ensure **long lasting networks and high quality service for users.**

XpFibre value chain

As an infrastructure operator, XpFibre is involved throughout **the deployment, commercialization, and ultimately the operation** phases of the network, while commercial operators provide services directly to end users.



DEPLOY

Build FTTH infrastructure across the territory

- Network conception & Engineering
- Civil engineering & Construction works
- Installation of active & Passive networks
- ARCEP compliance



COMMERCIALIZE

Provide wholesale network access to operators

- Network availability
- Offers & Access contracts
- Interface with operators
- Always available infrastructures



OPERATE

Ensure the operation, maintenance and quality of the network

- 24/7 Supervision
- Preventative maintenance
- Corrective maintenance
- Always Available infrastructures



XpFibre's business model consists of building the infrastructure, operating and maintaining it, and making it available to commercial operators (COs) through neutral and shared wholesale offers. It is therefore an almost exclusively B2B model.

XpFibre may also provide pre equipment services for new real estate developments to private individuals (such as building access infrastructure on the property or pre connection). This represents the Group's value chain across the different stages involved in deploying a fiber optic network.

XpFibre : What are the ESG challenges ?

To fulfil its mission as an infrastructure operator and meet the expectations of its stakeholders, the Group must address **several key ESG and operational challenges**. These challenges determine **the quality of our services and our ability to sustainably** support the digital transformation of the territories.

When deploying a fiber network, whether pulling cables, connecting equipment, or verifying service quality, on site interventions are essential. These activities, often carried out using utility vehicles, have **an environmental impact**.

ENVIRONMENTAL CHALLENGES

- **Ecological transition:** Environmental management is a critical issue due to the energy consumption of our technical sites, the impact of civil engineering works, and the production of equipment. The need to reduce emissions and improve energy efficiency shapes our priorities. Fiber optics, by nature is more energy efficient than copper during the operational phase, also contributes to digital sobriety.

It is a sustainable, low energy solution that combines performance with environmental responsibility.

SOCIAL CHALLENGES

- **Digital inclusion:** As a key operator within the territories, XpFibre plays a role in digital inclusion, equitable access to services, the creation of local opportunities, and the development of skills. For example, improved fiber connectivity enables better access to healthcare and various online public services for households and businesses.
- **Health and safety:** The safety of teams is therefore a central ESG concern. Conducting site audits, providing regular training, implementing strict operational procedures, and supplying adequate protective equipment are essential to prevent accidents and ensure safe working conditions during field interventions.
- **Economic competitiveness:** The deployment and availability of fiber optic networks across France are essential to strengthening the competitiveness of French businesses. In addition, fiber deployment actively contributes to job creation, through infrastructure construction, maintenance activities, and the sale of Internet services.

GOVERNANCE CHALLENGES

- **Ethic and transparency:** Governance plays a decisive role in ensuring transparency, ethical conduct, and the sound management of infrastructure projects. Operators work at the heart of local territories, in close collaboration with local authorities, which requires a robust and exemplary governance framework.

Fiber projects are often deployed under public service delegations, partnerships, or agreements with local authorities. Governance must therefore ensure:

- Transparency in decisions, investments, and operating methods;
- Clear and regular communication with elected officials and technical departments;
- Traceability of commitments (timelines, service quality, territorial coverage);
- Responsible management of public funds when projects are co funded or subsidized.

Strong governance strengthens the trust of local authorities and contributes to the long term, effective management of infrastructures deployed across their territories.

- **Anticorruption:** Fiber deployment involves numerous stakeholders, including public actors (local authorities, subcontractors responsible for deployment and network operation, and commercial operators).

In this context, preventing corruption is a major challenge, and XpFibre upholds a zero tolerance policy toward corruption and influence peddling.

To mitigate risks and prevent misconduct in commercial or institutional relations — particularly during subcontractor selection or interactions with local elected representatives — XpFibre implements a robust anti corruption compliance framework aligned with the Sapin II law, as described in section 7 of this report.

- **Territorial development:** One of the major challenges of fiber optic deployment is ensuring equitable coverage across all territories (Mainland France, Corsica and DROM), including in the most rural areas.





5.

**Our response to
ESG challenges:
The OPEN policy**

To structure its approach, XpFibre has formalized an **ESG policy named OPEN**, built around three pillars: **operational excellence, social commitment, and environmental commitment**.

This policy is rooted in XpFibre's role as an infrastructure operator specialized in the design, construction, and operation of FTTH² networks.

Operational excellence

Under the "operational excellence" pillar, XpFibre's OPEN ESG policy aims to align technical performance (availability, service activation quality, reduction of incidents) with stakeholder expectations and public performance indicators.

ESG indicators are assessed annually (indicator monitoring, updated action plans) to remain aligned with:

- **Regulatory requirements specific** to FTTH networks (mutualization, quality, continuity),
- **The expectations of local authorities** (RIP/DSP) and commercial operators (access, network quality),
- **The progressive shutdown of the copper network** and the widespread adoption of very high speed services.

Operational excellence is at the core of an FTTH infrastructure operator's mission. For XpFibre, it is based on network quality, operational reliability, service continuity, and the ability to provide neutral and open wholesale access, benefiting end users' freedom of choice.

The OPEN policy

The FTTH network maintenance mission requires a **structured operational framework**, particularly in:

- **Handling reports and resolving network incidents** (failed connections, outages, damage to mutualized infrastructure),
- **Restoring and rehabilitating segments** with high failure rates, issues identified by ARCEP as a major improvement area for the sector.

The infrastructure deployed by XpFibre forms **the foundation of the end user experience**.

XpFibre strengthens its operational excellence through:

- Rigorous management of field interventions to **reduce service interruptions**,
- Optimized intervention times **supporting commercial operators' commitments**,
- Smooth coordination with commercial operators to **minimize the impact of incidents** on users,
- High quality infrastructure enabling operators to **deliver reliable services** without additional cost or technical complexity.



Social commitment

The Group's social commitment is part of a broader effort **to manage human and operational risks inherent** in the construction and maintenance of critical infrastructure, while also contributing to the digital inclusion of territories.

FTTH deployment and operational activities involve numerous stakeholders (internal teams, subcontractors, commercial operator technicians). ARCEP places explicit emphasis on **improving field interventions and correcting defects**, reinforcing the importance of rigorous oversight of practices, safety, and controls.

To ensure a high level of safety during field interventions and protect employee health, the Group implements an **annual mandatory training program**. These sessions aim **to prevent risks inherent** to fiber optic professions and **maintain strict operational control**. Employees receive training and awareness on several key topics, including:

- **Electrical accreditation:** Enabling technicians to work safely near electrical installations or equipment, in compliance with regulatory requirements.
- **AIPR (Authorization for Work Near Networks):** Essential for teams working near underground or aerial networks, to reduce the risks of infrastructure damage and accidents.
- **Occupational health and safety:** Strengthening the safety culture within teams, preventing accidents, and ensuring safe working conditions both in the field and in technical environments.
- **Road-safety risks:** Raising awareness about safe driving practices to reduce accidents linked to the numerous trips required for operations and maintenance.



Environmental commitment

To contribute to the environmental transition, XpFibre is engaged in a continuous improvement process structured around four major levers:

- **Energy efficiency** at technical sites (NROs, active equipment, and hosting facilities).
- **Limiting the environmental footprint of works and equipment**, including civil engineering, cabling, and technical devices.
- **Optimizing technician and field team travel**, which is essential for network deployment, operations, and maintenance.
- **Reducing emissions across all scopes**, with a particular focus on Scope 3, which represents the majority of the Group's carbon footprint (see section 7 – Carbon Footprint).

In 2025, XpFibre completed its **global carbon** footprint assessment, carried out using a comprehensive approach and audited by an independent third party, ensuring methodological rigor and transparency.

The detailed breakdown of the Group's emissions is presented in section 7 of the report.



A photograph of three people in a modern office setting. A Black man in a white patterned shirt stands in the center, pointing at a small green plant on a desk. To his left, a woman with brown hair and a yellow top is smiling. To his right, a man with brown hair and a beard, wearing a green t-shirt and white headphones, is also smiling. The background shows office desks, computers, and large windows.

6.

Double materiality assessment

The CSRD

The CSRD (Corporate Sustainability Reporting Directive) is a European Directive aimed at harmonizing non financial reporting among European companies regarding their environmental, social, and governance impacts.

This new reporting framework was initially expected to apply from July 1, 2026. However, the Omnibus Act of April 20, 2025, and its approval by the European Council on February 24, 2026, postponed the implementation of these new obligations.

Nevertheless, XpFibre chose to continue its double materiality assessment project, which represents **a key step in defining the Group's ESG policy** and corresponding action plans. The double materiality matrix makes it possible to identify and prioritize the issues that may represent a financial or operational risk for the company. It also highlights XpFibre's approach to prioritizing its essential indicators.

The double materiality assessment is based on two distinct yet complementary perspectives:

- **Financial materiality:** evaluates the impact of environmental and societal issues on the company's economic performance. It refers to how ESG matters affect the company's opportunities, risks, and financial results.
- **Impact materiality:** examines the effects of the company's activities on the environment and society, in other words, how its operations positively or negatively influence individuals, the planet, and communities.

The Group conducted a comprehensive double materiality assessment in accordance with ESRS³ standards to define the material Impacts, Risks, and Opportunities (IROs) from both an impact based and financial based perspective. XpFibre developed its double materiality matrix between 2024 and 2025.

The entire process, along with the final matrix, was certified by **an independent third party** in 2025.

Structured and certified methodology

The analysis was based on:

- A detailed review of our activities,
- Our ESG objectives,
- The mapping of our stakeholders,
- An examination of our value chain,
- The establishment of a list of potential ESG impacts,
- The definition of potential financial impacts,
- The scoring of financial and ESG impacts (likelihood of occurrence, potential magnitude...),
- The consolidation of results to prioritize sustainability issues according to the significance of the identified impacts.

This process enabled the selection of extra financial indicators, the Group's IROs, leading to the identification of six priority themes for XpFibre's activities. In total, **64 impacts, 69 risks, and 38 opportunities** were analyzed, resulting in **35 impacts, 30 risks, and 16 opportunities** being retained to construct XpFibre's double materiality matrix.

The priority IROs in 2025 are as follows :



Climate change



Workforces



End clients



Pollution



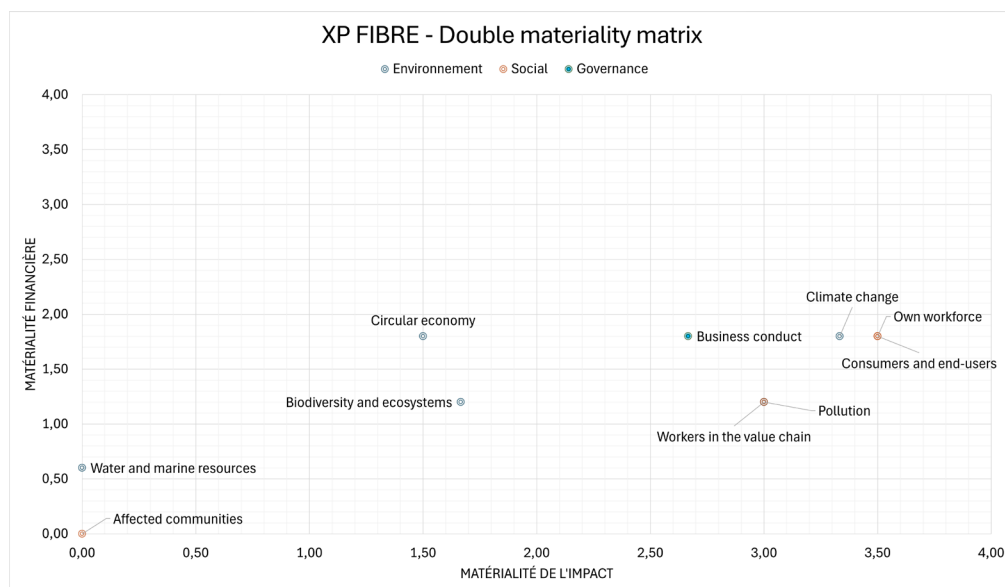
Governance



Workers in the value chain

Double materiality assessment

After defining our approach and identifying **our priority issues**, the matrix below illustrates how these themes are positioned in terms of **their impact** on the Group and **their importance** to our stakeholders.



The Group's double materiality matrix shows that themes such as **climate change, workforce management, and the relationship with end users** are particularly material for XpFibre. Their materiality is explained by the fact that these issues directly influence **the continuity, performance, and resilience** of the Group's activities, while also reflecting strong expectations from stakeholders.

Climate change affects **the long term resilience of the Group's infrastructures** and its **decarbonization trajectory**. The workforce is a key driver of **service quality, safety, and innovation**; and end users shape the sustainability of the business model through their usage patterns, expectations regarding network quality, and increasing demand for responsible and sustainable connectivity.

Furthermore, the themes of affected communities and water pollution are classified as non material in this matrix because the Group operates in France and complies with the national legal framework, which ensures **worker protection**. In addition, the national « Très Haut Débit » Plan seeks **to reduce the digital divide** and integrate all territories through fiber optic deployment.

Finally, water is not involved in XpFibre's business model, and no process requires the use of this resource. Similarly, the waste generated by our activities is not discharged into aquatic environments and therefore has no impact on ecosystems or marine resources.

A group of people in an office setting, smiling and stacking their hands in a team-building exercise. The image is warm and collaborative, with a large window in the background. The text '7. ESG actions in practice' is overlaid on the left side of the image.

7.

ESG actions in practice

Professionnal equality

XpFibre is committed to ensuring professional equality for all its employees. As part of this effort, the Group assesses its internal performance using the **Professional Equality Index**⁴, developed by the French Ministry of Labor and Employment.

This index evaluates companies across four sub categories:

- Gender pay gal,
- Promotion gap,
- Salary increases granted to women returning from maternity leave,
- Proportion of women among the ten highest salaries.

In 2024, XpFibre achieved a **KPI 2 score of 82/100**, based on the Professional Equality Index. This score, audited by an independent third party, reflects the Group's strong commitment to promoting professional equality within its organization.

Environmental transition

CARBON FOOTPRINT

To calculate its carbon footprint, XpFibre applied the Greenhouse Gas Protocol (GHG Protocol)⁵ methodology. This internationally recognized method enables companies to account for all greenhouse gas emissions across their entire value chain, both upstream and downstream, for the relevant fiscal year.

The GHG Protocol presents several characteristics that led XpFibre to select this approach for its carbon assessment:

- Internationally recognized method,
- Compatible with ISO 14064⁶,
- Aligned with the CSRD⁷ reporting framework,
- Provides detailed accounting across the value chain,
- Ensure transparency and comparability between companies.

⁴ <https://egapro.travail.gouv.fr/>

⁵ <https://ghgprotocol.org/>

⁶ <https://www.iso.org/fr/standard/66453.html>

⁷ Corporate Sustainability Reporting Directive

XpFibre applied **the operational control approach** when calculating its emissions:

- The company accounts for **100% of emissions** from activities or sites over which it exercises operational control, meaning those where it defines and implements operational policies, particularly related to the environment, safety, or production.
- The company must include **all sites it manages daily**, even if it does not own them.
- The company must include subsidiaries for which it directs operations, even if it holds **less than 50% ownership**,
- The company must include **direct emissions (Scope 1)**, **indirect energy emissions (Scope 2)**, and any relevant **Scope 3 emissions** associated with these activities.

In accordance with the GHG Protocol, emissions are structured into **three analytical categories**, or « **Scopes** », illustrated in the infographic below.

Classification of Greenhouse Gas Emissions

According the GHG Protocol



Direct Emissions

Emissions from **sources controlled by the company**:

- Fleet of Vehicles
- Boilers & Generators



For XpFibre :
Fuel for the Group's vehicles.



Indirect Energy Emissions

Purchased energy
(electricity, heat, cooling):

- Offices
- Technical sites



For XpFibre :
Electricity consumption of technical sites and offices



Indirect Value Chain Emissions

Emissions of value
upstream and downstream:

- Achats & Travaux
- Transport & Déplacements
- Fin de vie des équipements



For XpFibre :
Works, manufacturing, waste & transport

15 UPSTREAM & DOWNSTREAM CATEGORIES



Purchases & Services



Civil Engineering

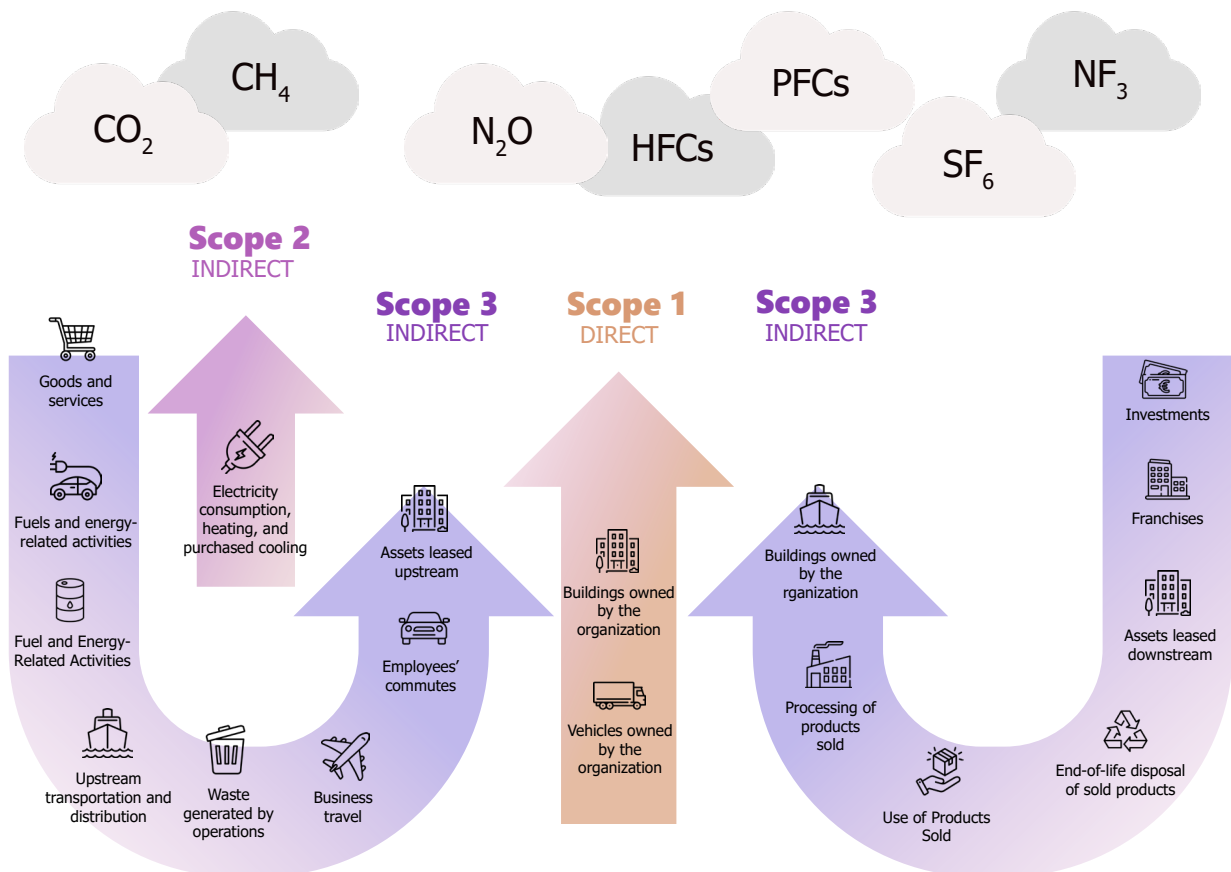


Transport



Recyclables

A Group's **carbon footprint** encompasses **all emissions generated throughout its entire value chain**: upstream, prior to its operations; at the core of its activities, through direct and energy related emissions; and downstream, through product use, transportation, or end of life processing. This approach makes it possible to position each emission category within the three scopes defined by the GHG Protocol.



The carbon footprint of the XpFibre Group for the 2024 fiscal year, audited by an independent third party, is detailed below:



SCOPE 1:

Accounts for **less than 1% of total emissions**, thanks to improvements in the Group's vehicle fleet (see section 7.2.3 — Sustainable Mobility).

SCOPE 2:

Corresponding to the Group's electricity consumption, represents **3.7% of total carbon emissions**. The replacement of copper with fiber — which is three times less energy intensive and more durable — contributes to energy efficiency. Additional actions to reduce electricity consumption, such as the "Cool Roof" project, also play a role (see section 7 — Energy Efficiency).

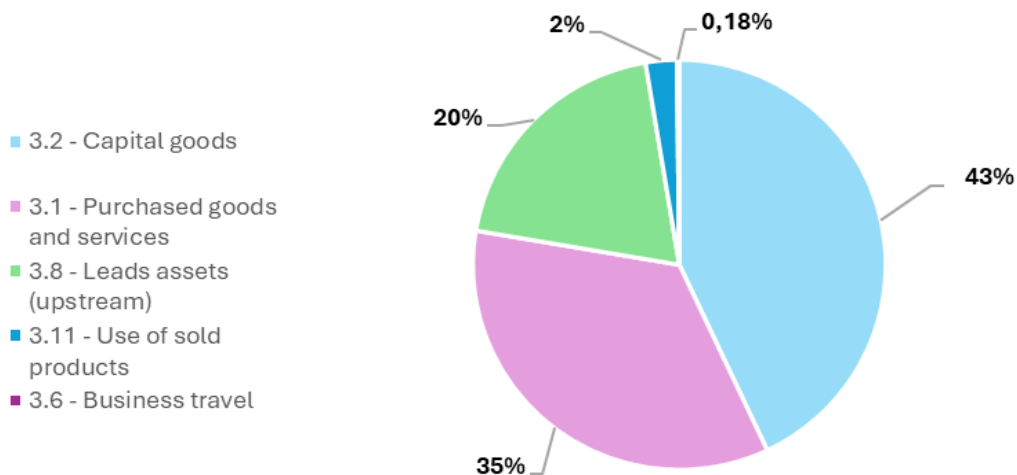
SCOPE 3:

Represents **96% of XpFibre's total carbon footprint** for 2024.

97% of Scope 3 emissions are explained by the major emission categories detailed below. The remaining 3%, which is less significant, is linked to regular business activities such as employee commuting and other routine services.

- The largest contributor within Scope 3 is fixed assets (43%), driven by : the linear meters of deployed fiber optic cables, civil engineering works required for deployment, structural equipment essential to operations (cabinets, PMs, and IT equipment).
- The second largest contributor (35%) is purchased services, which primarily include emissions from technician travel for customer connections and maintenance operations. Consulting services commissioned by the Group are also accounted for in this category.
- The third-largest contributor (20%) corresponds to upstream leased assets. This includes annual leases essential to XpFibre's operations, such as civil engineering infrastructure provided by other infrastructure operators, utility poles, backbone elements, and active equipment.

The graphic below represents the distribution of Scope 3 emissions across these categories.

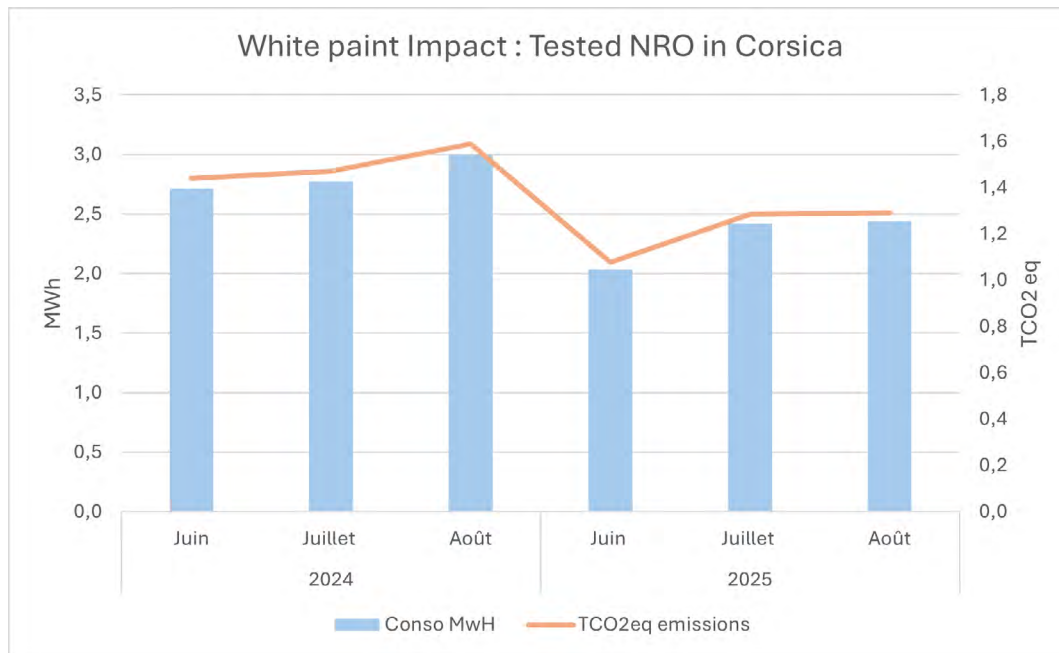


ENERGY EFFICIENCY OF SITES : « COOL ROOF » PROJECT

As part of its strategy to reduce its carbon footprint, XpFibre has committed to **sustainably decreasing its electricity consumption**, which represents the main component of its Scope 2 emissions.

In 2025, the Group launched an innovative project involving the application of reflective coatings on **the roofs of its Optical Connection Nodes (NRO)** to limit heat absorption and reduce cooling needs. This solution was deployed as a priority in regions most exposed to high temperatures (Corsica, Guadeloupe, Martinique).

A test phase conducted in Corsica, in the context of rising summer temperatures, demonstrated **a reduction of approximately 20% in the electricity consumption** of the treated technical site, confirming the effectiveness of the approach. The gains mainly resulted from **the decreased thermal load and reduced cooling requirements** for technical equipment.



The chart provides a concise illustration of the energy consumption of the first “test” NRO painted in Corsica in May 2025, comparing data from 2024 and 2025.

- **Clear year on year reduction in energy consumption** over the June–August period.
- **Associated emissions also decreased:** the tCO₂e curve follows the same downward trend, with lower levels in 2025 than in 2024. The decline in energy consumption directly translates into a reduction in carbon footprint.

This initiative demonstrates a tangible improvement, both in consumption and emissions, during the summer of 2025 compared with 2024, consistent with **the expected effects of an energy efficiency project.**

Building on these positive results, XpFibre plans to **progressively deploy this solution** across all eligible NROs in Corsica, Martinique, and Guadeloupe. This initiative contributes to:

- **Improving** the energy performance of infrastructures,
- **Strengthening** the thermal resilience of sites facing increasingly frequent heatwaves,
- **Reducing** Scope 2 emissions.

This project represents a concrete lever for climate adaptation and energy efficiency, fully aligned with the Group's environmental trajectory.



Picture of the first tested NRO in Corsica, May 2025.

SUSTAINABLE MOBILITY

In 2025, XpFibre completed **the full phase out of diesel vehicles** from its fleet. All diesel powered vehicles were replaced, marking a **significant step** in reducing direct emissions (Scope 1).

A total of **70 new vehicles** were added to the fleet, featuring petrol, hybrid, and 100% electric engines. This renewal helps **reduce the company's carbon footprint, decrease pollutant emissions linked to travel, and modernize the fleet as a whole.**

This initiative is part of a broader effort to **improve environmental performance and transition toward more sustainable mobility solutions.**

XpFibre has also **introduced a financial support** scheme designed to encourage employees to adopt more sustainable **modes of transportation.**

This program helps fund the purchase of **an electric bicycle or electric scooter,** promoting lower emission commuting and strengthening the use of soft mobility within the Group.

Ethic and conformity

The Compliance Department structures and oversees the implementation of **an anticorruption framework** ensuring that the XpFibre Group complies with the provisions of **the Sapin II law**, including all internal policies.

As part of its missions related to preventing non compliance risks and applying the requirements set out in the Sapin II law, the Compliance Department also ensures the **broader promotion of a culture of integrity and ethics.**

Accordingly, the implementation within the XpFibre Group of the following key frameworks, policies, and procedures is intended to **guarantee exemplary conduct** across the Group and **full adherence to our obligations** under the Sapin II law:

- **Anticorruption code of conduct:** defines the principles, behaviours, and best practices expected from all XpFibre employees in the performance of their duties.
- **Conflict of Interest Prevention and Management Policy:** identification, disclosure, and management of sensitive situations that could compromise staff objectivity or independence.
- **Gifts & Invitations Policy:** strict rules governing the acceptance and offering of gifts, invitations, or benefits to prevent any form of corruption or undue influence.
- **Internal Whistleblowing System:** oversight of the internal reporting mechanism allowing the reporting of behaviours that violate ethical rules or may pose risks to the company, its employees, or its partners. This system is accessible to all employees as well as external stakeholders and ensures full confidentiality of reports. The Group promotes a culture of openness and responsibility, where every employee can contribute to risk prevention by reporting any non compliant behaviour in good faith.



A photograph of three people in a modern office environment. On the left, a Black man with a beard and headphones around his neck is smiling and holding a yellow and white coffee cup. In the center, a woman with red hair, wearing a green button-down shirt, is smiling and holding a brown ceramic mug. On the right, a woman with brown hair in a ponytail, wearing a patterned blouse and glasses, is smiling and holding a green ceramic mug. They are standing in front of a desk with several potted plants. In the background, there is a black shelving unit with various office supplies and more plants. The overall atmosphere is bright and positive.

8.

2025 Conclusion & ambitions

The infographic below provides an **overview of the key actions** implemented by the Group over the year.

It highlights **the initiatives deployed**, notably those supporting digital inclusion, **employee training, and the Group's environmental transition**.

Through the projects undertaken to reduce the carbon footprint, in particular the energy optimization of infrastructures and the transition to a diesel free vehicle fleet, it also illustrates the cross functional actions implemented across the Group to strengthen compliance systems and **support the deployment and maintenance of the networks**.

TRAINING



- Responsible Digital Workshop,
- Training on the Climate Workshop Role Play,
- Employee Training : health, safety, AI & ESG.

CERTIFICATIONS



- Double materiality analysis,
- Improved professional equality score,
- Carbon footprint audit by independent third party.

CARBON



- « Cool Roof : Energy efficiency project,
- 100% diesel-free fleet.

GROUP



- Strengthening compliance framework,
- Network deployment & maintenance.

XpFibre will continue its ESG trajectory around three priorities:

- **Strengthening energy performance** and accurately measuring the savings achieved,
- **Consolidating social indicators**, particularly regarding gender equality, training, and quality of working life,
- **Enhancing transparency**, through the gradual publication of consolidated data for a complete carbon footprint.

