ZAYO GROUP LLC

1401 Wynkoop Street
Denver, CO 80202
USA

www.zayo.com
@ZayoGroup

GREENHOUSE GAS EMISSIONS REPORTING

In 2025, working with Optera, an expert consulting firm in greenhouse gas emissions accounting (GHG), we completed carbon emissions reporting for *calendar year 2024*. This GHG Emissions report covered Scopes 1, 2 and 3 for 2024. Through our continued improvement in environmental policies and practices, including emissions data collection, analysis, and verification, our CDP scores continue to improve. Zayo's climate score of B signifies that we are taking coordinated action on climate issues.

Scope 1 Emissions 	Direct emissions from operations
Scope 2 Emissions 	Indirect emissions from the generation of purchased energy
Scope 3 Emissions 	Up and downstream emissions resulting from activities from assets

The Value of CDP Scores

- CDP scores play a critical role in moving companies from transparency to action. There are clear business benefits that come with greater transparency. CDP A List companies outperformed market peers by 6% in stock gains for the last decade, showing that transparency and ambition are rewarded by the market.
- CDP scores consider datapoint alignment with leading frameworks and standards, helping your organization navigate compliance more effectively.
- CDP scores are used by global investors to monitor their own portfolios, assess future investments, and comply with regulation and industry commitments.
- CDP data helps manage increasing risks as a result of climate change, exposing the real economic losses from climate events, the impacts of more sustainable practices and their effect on business models and returns on investment.

CDP runs the global carbon disclosure system for investors, companies, cities, states and regions to manage and report environmental impacts. CDP is considered the gold standard of environmental reporting.

GREENHOUSE GAS INVENTORY: Executive Summary

The Greenhouse Gas Inventory ("Inventory") describes Zayo's impact on the environment as measured in greenhouse gas (GHG) emitted in units of equivalent tons of carbon dioxide for the reporting year 2024, comprised of January 1, 2024 to December 31, 2024. The purpose of this Inventory is to benchmark Zayo's organization-wide GHG emissions and to develop a consistent methodology for documenting the emissions inventory on an ongoing basis. Optera compiled the inventory with support from the Corporate Sustainability Director as well as numerous other Zayo staff.

Renewable Energy - Through our commitment to environmental stewardship, Zayo supported renewable energy by purchasing 181,388 megawatts of Certified Renewable Energy Certificates (RECs) to abate 100% of its 2024 electricity use. A REC represents the environmental benefit associated with one megawatt-hour of energy generated from renewable resources. This effort to address the environmental impact of our operations not only allows Zayo to lower our carbon footprint, but it also supports the development of renewable energy technologies.

Methodology

Zayo's inventory is developed in accordance with the revised GHG Protocol Corporate Standard. The procedures developed and executed during development of the Zayo Inventory for Reporting Year 2024 satisfy ISO Standard 14064-1.

Inventory development involves the collection and examination of documentation, testimony and data from internal and external sources. Development also includes a determination of completeness and accuracy of the data provided and calculations completed using this data.

3rd Party Verification of GHG Inventory

Lucideon is an established leading verification and certification body and provided 3rd-party assurance for Zayo's 2024 GHG Inventory. This limited assurance verification was carried out

against requirements of the GHG Protocol, the General Reporting Protocol and ISO 14064-3 for operational level reporting. Lucideon is an accredited verification partner of CDP.

Key Findings

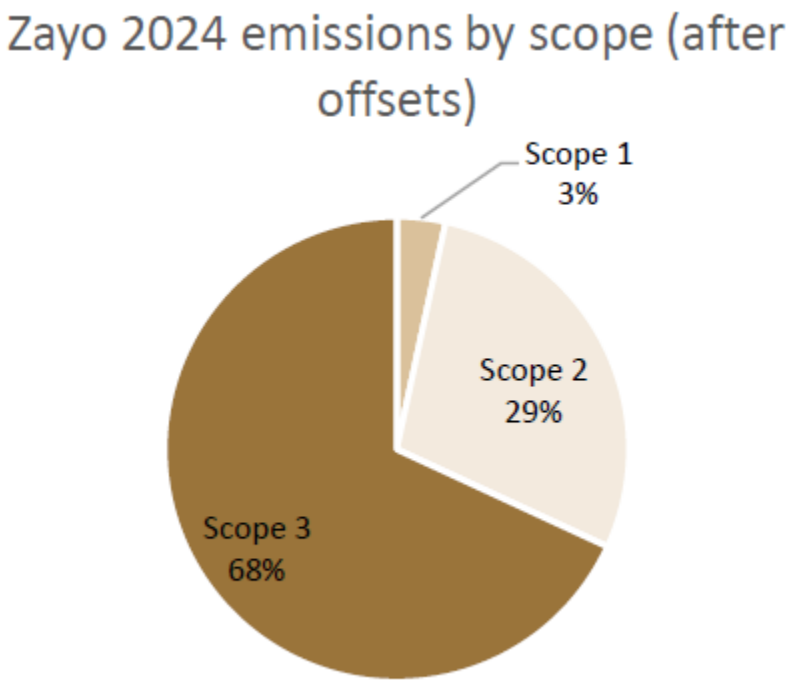
Zayo's 2024 GHG Inventory consists of emissions from scope 1, 2 and 3 categories. The following table summarizes Zayo's GHG inventory by emissions scope. Zayo's 2025 GHG inventory will be completed and 3rd-party verified by June 2026, as per our process.

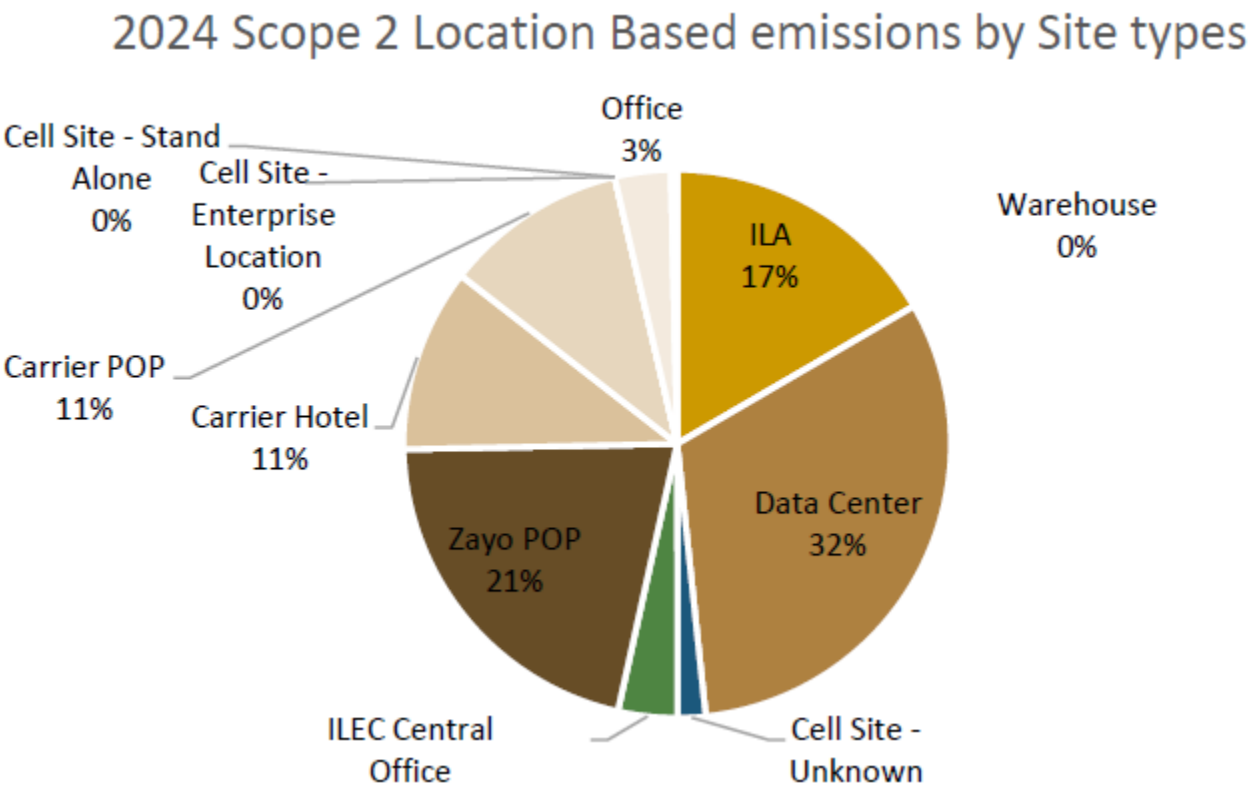
2024 Global Emissions Totals by Scope

Scope	2024 Emissions	Details
Scope 1 Total (Location Based) Total	14,698 mtCO2e	Direct greenhouse (GHG) emissions that occur from sources controlled/ owned by Zayo
Scope 1 Total (Market Based) Total	7,898 mtCO2e	Direct greenhouse (GHG) emissions that occur from sources controlled/ owned by Zayo
Scope 2 (Location Based) Total	66,376 mtCO2e	Indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling
Scope 2 (Market Based) Total*	0 mt CO2e	Indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling
Scope 3 (Location Based) Total	158,707 mtCO2e	Result of activities from assets not owned/controlled by Zayo, but indirectly impacting its value chain
Scope 1+2 (location based) Total	**81,074 mtCO2e**	

Scope 1+2 (market based)* Total	**7,898 mtCO2e**	
Scope 1+2+3 location-based Total	**239,781 mtCO2e**	
Scope 1+2+3 market-based Total*	**166,605 mtCO2e**	** After applying RECs and/or Offsets*

EMISSIONS TOTALS BY SCOPE AND CATEGORY





2024 Zayo Greenhouse Gas Emissions Intensity

Greenhouse gas or emissions intensity is a measure of the emission rate of a given pollutant relative to the intensity of a specific activity process. Revenue is one of the most common means of calculating emissions intensity. Intensity is a standard question for many reporting platforms such as the Carbon Disclosure Project (CDP). Based on publicly reported revenue information, Zayo's 2024 greenhouse gas emissions intensity is as follows:

Emissions Intensity
91

Zayo GHG Inventory Development: 2024 Approach

GHG Protocol

The Greenhouse Gas (GHG) Protocol was developed by the GHG Protocol Initiative, a multi-stakeholder partnership of businesses, nongovernmental organizations (NGOs), governments, academics and others convened by the World Business Council for Sustainable Development (WBCSD) and the World Resources Institute (WRI). Launched in 1998, the Initiative's mission is to develop internationally accepted greenhouse gas accounting and reporting standards and/or protocols and to promote their broad adoption. According to the GHG Protocol Initiative, 92%

of Fortune 500 companies responding to CDP (previously the Carbon Disclosure Project) in 2016 used the GHG Protocol directly or indirectly.

The original GHG Protocol Corporate Accounting and Reporting Standard (GHG Protocol Corporate Standard) was published in 2001. The revised GHG Protocol Corporate Standard, published in 2004, was further updated in 2015 to include additional guidance for calculating Scope 2 emissions. The GHG Protocol Corporate Standard covers the accounting and reporting of the six greenhouse gasses covered by the Kyoto Protocol, including carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6).

The Corporate Value Chain Accounting and Reporting Standard, published in 2011, provides guidance for companies to assess their entire value chain (Scope 3) emissions impact from 15 categories of activities.

Accounting Principles

The International Organization for Standardization (ISO) is an international standard-setting body composed of representatives from various national standards organizations. ISO Standard 14064-3 defines six principles that should be upheld in the development of a GHG inventory assertion. These principles are intended to ensure a fair representation and a credible and balanced account of GHG emissions.

The procedures developed and executed during development of the Zayo Inventory for Reporting Year 2024 satisfy each of the principles below:

- Relevance
- Completeness
- Consistency
- Accuracy
- Transparency
- Conservativeness

Boundary Conditions

The GHG Protocol recommends the use of the more comprehensive of two approaches to setting an Organizational Boundary for an emissions inventory: control approach or equity approach. The control approach prescribes measurement of emissions from operations over which an organization has practical control. Zayo's 2024 portfolio includes those locations where equipment and utilities are owned and paid by Zayo, and locations that Zayo leases to other vendors/customers and follows the control approach.

Zayo's 2024 GHG Inventory includes emissions from scope 1, 2 and scope 3 sources. The following table outlines the emissions activities that are both included and excluded from Zayo's GHG Inventory for Reporting Year 2024.

2024 GHG Inventory Inclusions/Exclusions

Inclusion of scope 1, scope 2 and scope 3 emissions data sources will be reevaluated annually to assess the feasibility, accuracy and materiality of Zayo's GHG inventory. Further, Zayo will assess site operation on an annual basis to determine locations for inclusion in subsequent inventories.

Emissions Scope	**Emissions Source(s)**	**Materiality**
Scope 1	Natural Gas	Material
Scope 1	Mobile Fuel	Material
Scope 1	Generator	Material
Scope 1	Refrigerator	Material
Scope 2	Purchased Electricity	Material
Scope 3	Purchased Goods & Services	Material
Scope 3	Capital Goods	Material
Scope 3	Fuel & Energy Related Activity	Material
Scope 3	Upstream Transportation & Distribution	Material
Scope 3	Waste Generated	Material
Scope 3	Business Travel	Material
Scope 3	Employee Commute	Material
Scope 3	Upstream Leased Assets	Irrelevant
Scope 3	Downstream Transportation & Distribution	Irrelevant

Scope 3	Processing of Sold Products	Irrelevant
Scope 3	Use of Sold Products	Irrelevant
Scope 3	End of Life Treatment	Irrelevant
Scope 3	Downstream Leased Assets	Material
Scope 3	Franchises	Irrelevant
Scope 3	Investments	Irrelevant

Inclusion of scope 1, scope 2 and scope 3 emissions data sources will be reevaluated annually to assess the feasibility, accuracy and materiality of Zayo's inventory.

Emissions Factors

Zayo applies emissions factors based on resources consumed. These factors are published by industry relevant sources, including The Climate Registry, GHG Protocol, International Energy Agency, utilities, etc., outlined in The Climate Registry's General Reporting Protocol and consistent with methodologies from the WRI/WBCSD GHG Protocol.

Optera used emissions factors based on recognized published data applicable to the types of emissions associated with the Inventory. See "Limitations" section below for additional information regarding assumptions related to emissions factors, fuel heat values, petroleum fuels and intensity factors.

Limitations

GHG and energy use data are subject to inherent limitations. Information and data were collected via Zayo staff and direct client communication. No on-site sampling was conducted. Rather than empirical measurements, Zayo's inventory is based on appropriate emissions factors from industry relevant sources, including The Climate Registry, GHG Protocol, International Energy Agency, utility, etc., outlined in The Climate Registry's General Reporting Protocol and consistent with methodologies from the WRI/WBCSD GHG Protocol. This methodology has been accepted based on the source of the emission factors used.

Greenhouse Gasses

Emissions scopes encompass a variety of greenhouse gasses. The GHG Protocol Corporate Standard covers the accounting and reporting of the six greenhouse gasses covered by the Kyoto Protocol, listed below:

- CO_2: Carbon Dioxide
- CH_4: Methane
- N_2O: Nitrous Oxide
- PFC: Perfluorocarbons (e.g. Perfluoromethane from aluminum smelting)*
- HFC: Hydrofluorocarbons (e.g. HFC-134a from refrigerant losses)*
- SF_6: Sulfur hexafluoride (e.g. e.g. in high voltage electrical equipment)*
- NF_3: Nitrogen trifluoride

GLOBAL WARMING POTENTIAL

Different GHGs have a different impact on the Earth's warming. The difference is due to the ability of a gas to absorb energy ("radiative efficiency") and the longevity of the gas in the atmosphere ("lifetime"). The Global Warming Potential (GWP) is a measure of how much heat a GHG traps in the atmosphere up to a specific time horizon, and allows comparison of the global warming impacts of different gases. GWP is expressed as a factor of carbon dioxide, which is to say that it reflects a measure of how much energy the emissions of 1 ton of a GHG will absorb over a given time period relative to the emissions of one ton of carbon dioxide (CO_2). The larger the GWP, the greater the contribution to Earth's warming.

The table below depicts 100-year time horizon GWP estimates as published in the International Panel for Climate Change (IPCC) Fifth Assessment Report (AR5)[1] for the six GHGs covered by the Kyoto Protocol.

Global Warming Potential (GWP) by Greenhouse Gas

Greenhouse gas	Formula	GWP	time horizon	GWP Source
Carbon Dioxide	CO_2	1	100-year	IPCC AR5
Methane	CH_4	28	100-year	IPCC AR5
Nitrous Oxide	N_2O	265	100-year	IPCC AR5

*There are no significant sources of perfluorocarbons (PFCs), sulfur hexafluoride (SF_6) and nitrogen trifluoride (NF_3) in Zayo's Inventory– the remaining GHGs required for accounting/reporting by the UNFCCC/Kyoto Protocol in Zayo's operations.

Validated Commitments to Net-Zero Goals

We formally committed to the Science Based Target Initiative (SBTi) to set ambitious near-term and net-zero emissions reduction targets to drive sustainable growth. In 2024 our Near Term and Net Zero targets were validated by SBTi. This is a critical step in meeting our net zero goals. Over the next several years, Zayo will continue to operationalize emissions reduction strategies and incorporate renewable energy opportunities within our footprint.

Near Term Targets

Zayo commits to reduce absolute scope 1 and 2 GHG emissions 97.3% by FY2030 from a FY2020 base year. Zayo also commits to reduce absolute scope 3 GHG emissions by 42% by FY2030 from a FY2022 base year. Zayo further commits to continue active annual sourcing of 100% renewable electricity through FY2030.

Long Term Targets

Zayo commits to maintain at least 97.3% absolute scope 1 and 2 GHG emissions reduction from FY2030 through FY2045 relative to a FY2020 base year. Zayo also commits to reduce absolute Scope 3 GHG emissions 90% by FY2045 from a FY2022 base year.

Overall Net Zero Target

Zayo commits to reach net-zero GHG emissions across the value chain by FY2045.

The Science Based Targets initiative (SBTi) is a global body enabling companies and financial institutions to set ambitious emissions reduction targets in line with the latest climate science. The SBTi's goal is to accelerate businesses across the world to support the global economy to halve emissions before 2030 and achieve net-zero before 2050.

The initiative is a collaboration between CDP, the United Nations Global Compact, the World Resources Institute and the World Wide Fund for Nature and one of the We Mean Business Coalition commitments.

ENVIRONMENTAL POLICY STATEMENT

Our Commitment: Building sustainability into all aspects of our business operations, and we are dedicated to making environmentally responsible decisions that align with our values.

Our Goal: To engage all of our stakeholders and vendors in environmentally responsible practices, which helps us build a more efficient business and a more resilient community.

We act via the following policies and practices to support a sustainable culture at Zayo:

- Complying with or exceeding standards in existing environmental regulations
- Innovatively improving environmental performance by minimizing resource consumption
- Assessing and mitigating material environmental impacts from operations
- Procuring efficient and environmentally-sound equipment that meets business and customer needs
- Minimizing our landfill waste stream through responsible disposal and recycling of electronic and office waste through established programs

- Minimizing use of water and reuse within operations as appropriate
- Implementing sustainable procurement practices
- Supporting alternative low- or no-fuel commuting options
- Optimizing energy efficiency at Zayo-operated buildings
- Providing paperless billing and quoting options
- Engaging stakeholders (employees, customers, suppliers, investors) to encourage environmentally sensitive practices through awareness campaigns and training

ENVIRONMENTAL PRACTICES

UN Sustainable Development Goals

We utilize the United Nations Sustainable Development Goals (SDGs) as a guideline for making sustainable decisions. Among the 17 overall goals, the SDGs are a call to action to protect our environment, end poverty and ensure prosperity and fairness for all people. The SDGs are designed as a pragmatic approach to ensure a sustainable tomorrow for future generations.

Zayo's Green Fiber

Zayo's fiber is better for the environment than other sources of Internet connectivity. Compared to copper, fewer physical resources are required to deploy and maintain a fiber network. Industry data indicates that data transmission using light consumes only a fraction of the energy versus sending an electrical signal over copper wiring. Compared to cable and DSL, fiber far exceeds the expectation of future development around sustainable business practices.

Reduce Reuse Recycle

Throughout our operations, we strive to minimize the amount of waste we produce through responsible disposal, reuse of material where applicable and recycling and repurposing electronic waste. We minimize our landfill waste through responsible disposal and recycling practices.

Water Resources

We monitor and manage our consumption of water used for drinking, sewage and use in cooling systems at technical sites. We continually strive to reduce our consumption and improve water efficiency.