2025



Zayo Greenhouse Gas Emissions Reporting

PUBLISHED SEPTEMBER 2026

Zayo

Zayo is actively working to be a catalyst for positive environmental action across our operations and value chain. Our environmental strategy is grounded in accountability, data-driven decision-making, and alignment with leading global frameworks. We have set science-based emissions reduction targets validated by the Science Based Targets initiative (SBTi) and continue to advance toward our long-term net-zero ambitions.

Through network modernization, renewable energy partnerships, optical technology innovation, and facility efficiency initiatives, Zayo continues to reduce energy consumption while supporting growing customer demand and network performance requirements.

- Since 2023, we have been modernizing the core infrastructure supporting Zayo's Tier 1 IP backbone with next-generation, high-capacity networking equipment. This upgrade has reduced power consumption by approximately 88% while maintaining equivalent network traffic volumes, significantly improving energy efficiency across our operations.
- We partner closely with colocation and data center providers to increase the use of renewable energy at our facilities, helping lower the carbon intensity of our network footprint in key locations.
- Through collaboration with our optical equipment vendors, we are advancing the efficiency of optical amplification technologies within our network. Emerging solutions have the potential to increase fiber amplification capacity by 4x to 16x while using substantially less space and power.
- We are actively piloting innovative HVAC technologies across select facilities, with early results demonstrating meaningful improvements in energy efficiency and reductions in overall power consumption.

Zayo completed its calendar year 2025 carbon emissions Scopes 1, 2 and 3 reporting in partnership with Green Project, a recognized leader in greenhouse gas (GHG) accounting and emissions reporting services. Through ongoing investments in environmental management, emissions accounting, and disclosure practices, Zayo continues to strengthen its climate reporting program. In 2025, Zayo maintained a CDP Climate score of B, reflecting coordinated action to manage climate-related impacts and opportunities.

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Scope 1 Emissions	Direct emissions from Operations
Scope 2 Emissions	Indirect emissions from the generation of purchased energy
Scope 3 Emissions	Indirect emissions occurring throughout Zayo's value chain



2025 Zayo Greenhouse Gas Inventory

Executive Summary

The Greenhouse Gas Inventory ("Inventory") describes Zayo's environmental impact as measured by greenhouse gas (GHG) emissions, reported in metric tons of carbon dioxide equivalent (mt CO_2e), for the reporting year spanning January 1 through December 31, 2025. The purpose of this Inventory is to establish a benchmark for Zayo's organization-wide GHG emissions and to maintain a consistent methodology for measuring, documenting, and reporting emissions on an ongoing basis. The Inventory was compiled by Green Project in collaboration with Zayo's Corporate Sustainability Director and numerous subject matter experts across the Zayo organization.

Methodology

Zayo's 2025 greenhouse gas (GHG) inventory was developed in accordance with the GHG Protocol Corporate Standard and aligns with the requirements of ISO 14064-1. The inventory development process included the collection, review, and validation of data from internal and external sources to ensure the completeness, accuracy, and consistency of reported emissions.

Key Findings

Zayo's 2025 greenhouse gas (GHG) inventory encompasses Scope 1, Scope 2, and relevant Scope 3 emissions. Zayo's 2025 GHG inventory included 263,333 mt CO_2e on a location-based basis and 204,826 mt CO_2e on a market-based basis after the application of renewable energy certificates (RECs). Scope 3 emissions represented the largest portion of the company's overall emissions profile, while renewable electricity procurement reduced total market-based emissions by approximately 59,000 mt CO_2e compared with the location-based inventory.

The following tables provide a summary of emissions by region of operations and reporting scope. In accordance with Zayo's established reporting practices, the inventory underwent independent third-party verification in 2026.

2025 Emissions (mt CO_2e)				
Scope	**North America**	**Europe**	**Global Reach**	**Total**
Scope 1	14,848	2,191	6	17,045
Scope 2 (Location Based)	54,080	5,045	48	59,173
Scope 2 (Market Based)*	0	0	0	0
Scope 3 (Location Based)	182,917	4,150	48	187,115
Scope 3 (Market Based)	183,594	4,144	43	187,781
Scope 1+2+3 (Location Based) Total	251,845	11,386	101	**263,333**
Scope 1+2+3 (Market Based)* Total	198,443	6,335	48	**204,826**

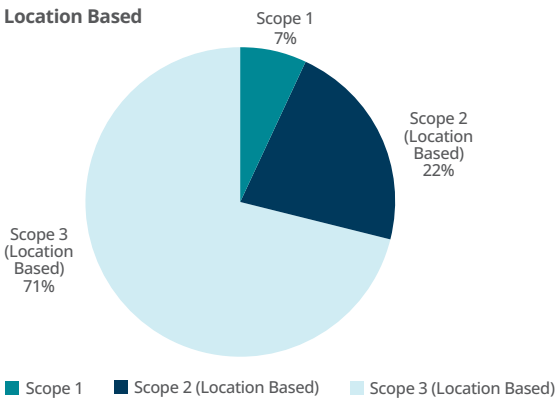
**after applying RECs*

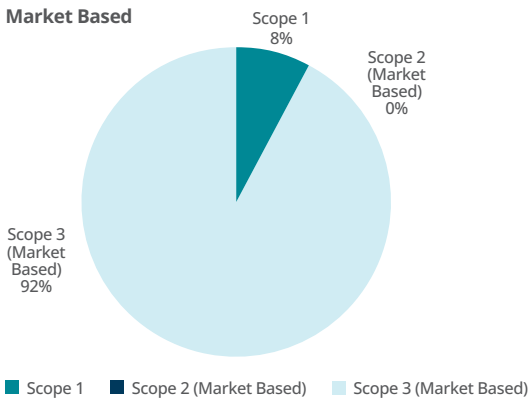
3rd Party Verification of GHG Inventory

Lucideon provided independent third-party assurance for Zayo's 2025 GHG Inventory through a limited assurance engagement conducted in accordance with the GHG Protocol, the General Reporting Protocol, and ISO 14064-3. Lucideon is an accredited CDP verification partner.

(See Appendix A for 2025 Verification Letter)

2025 Emissions by Scope



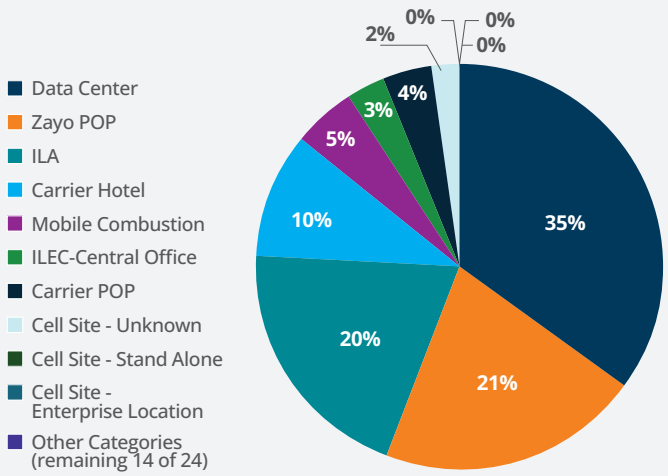


2025 Location Based Emissions Breakdown by Scope

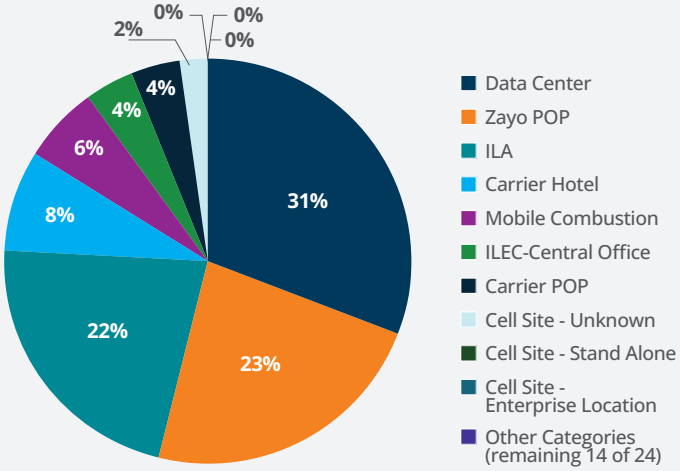
2025 Emissions (mt CO_2e)					
Scope	Source	North America	Europe	Global Reach	Total Location Based Emissions
Scope 1	Backup Generators	1,550	5	0	1,555
	On-Site Heating (natural gas)	940	198	0	1,138
	Refrigerants	8,379	1,988	6	10,372
	Mobile Combustion	3,979	0	0	3,979
Scope 2	Electricity	54,080	5,045	48	59,173
Scope 3	Purchased Goods and Services	72,112	104	0	72,216
	Capital Goods	65,622	0	27	65,649
	FERA	14,698	1,500	12	16,210
	Upstream T&D	273	10	0	283
	Waste Generated	314	0	0	314
	Business Travel	791	141	0	931
	Employee Commute	2,095	890	0	2,985
	Downstream Leased Assets	27,012	1,506	9	28,527
Scope 1+2+3 Total		**251,845**	**11,386**	**101**	**263,333**

2025 Emissions by Scope

Location Based Emissions by Site Type



Market Based Emissions by Site Type



Renewable Energy

As part of its environmental sustainability strategy, Zayo purchased 179,310 megawatt-hours of Certified Renewable Energy Certificates (RECs) to match 100% of its electricity consumption in 2025. This investment helps reduce the company's indirect greenhouse gas emissions footprint and supports the advancement of renewable energy generation and infrastructure. Energy efficiency improvements across operations reduced electricity consumption, resulting in the need to purchase approximately 2,000 fewer RECs compared with 2024.

2025 Greenhouse Gas Emissions Intensity

Greenhouse gas (GHG) emissions intensity measures emissions relative to a business activity indicator, providing a normalized view of environmental performance over time. Revenue is a commonly used intensity metric and is widely reported through sustainability disclosure frameworks, including CDP. Zayo's 2025 GHG emissions intensity is shown in the tables below:

Location Based Emissions Intensity

Business Unit	Location Based Emissions (mt CO_2e)	Intensity (mt CO_2e/million USD)	2025 Location Based Emissions Intensity: 99
North America	251,845	105	
Europe	11,386	49	
Global Reach	101	3	
Total	263,333	99	

Market Based Emissions Intensity (including RECs)

Business Unit	Location Based (after RECs) Emissions (mt CO_2e)	Intensity (mt CO_2e/million USD)	2025 Location Based Emissions Intensity: 77
North America	198,443	83	
Europe	6,335	27	
Global Reach	48	2	
Total	204,826	77	

Primary vs. Secondary Data

Zayo's 2025 GHG inventory was developed using both primary and secondary data sources. Primary data was obtained directly from utility and operational records, while secondary data was derived from established estimation methodologies where actual data was unavailable.

Consistent with industry practice, Zayo applies a risk-based approach to data collection, prioritizing primary data whenever feasible and utilizing estimation techniques to address data gaps. Approximately 54% of Scope 1 and Scope 2 activity data used in the development of the 2025 inventory was derived from secondary sources.

The table below summarizes data source coverage by emissions category:

Scope	Data Category	Primary Data %	Secondary Data %
Scope 1	Space Heating	24%	76%
	Mobile Fuels	100%	0%
	Refrigerants	1%	99%
	Generators	0%	100%
Scope 2	Electricity	52%	48%
Scope 3	Purchased Goods & Services	100%	0%
	Capital Goods	100%	0%
	FERA	45%	55%
	Upstream T&D	100%	0%
	Waste Generated	0%	100%
	Business Travel	100%	0%
	Employee Commute	100%	0%
	Downstream Leased Assets	23%	77%



2025 GHG Accounting Framework and Methodology

GHG Accounting Standards

Zayo's 2025 GHG inventory was developed in accordance with the GHG Protocol Corporate Accounting and Reporting Standard, including guidance for Scope 2 emissions and applicable Scope 3 categories. The GHG Protocol serves as the primary framework for measuring and reporting greenhouse gas emissions and supports consistent, transparent, and comparable disclosures.

The inventory was also prepared in alignment with the principles of relevance, completeness, consistency, accuracy, transparency, and conservativeness, which are reflected throughout Zayo's emissions accounting and reporting processes.

Emissions Factors

Zayo applies emissions factors based on the consumption of energy, fuels, and other emissions-generating activities. Emissions factors are sourced from recognized industry authorities, including The Climate Registry, the GHG Protocol, the International Energy Agency (IEA), utility providers, and other established sources. Green Project utilized the most appropriate published emissions factors available for the reporting year and emissions sources included within the inventory.

Data Limitations and Assumptions

As with all greenhouse gas inventories, reported emissions are subject to inherent data and methodological limitations. The inventory was developed using information collected from internal records, utility data, vendors, and other external sources. Where actual consumption data was unavailable, approved estimation methodologies and industry-standard emissions factors were applied.

Zayo's inventory was developed using recognized GHG accounting methodologies and the best available data at the time of reporting. Assumptions related to emissions factors, fuel characteristics, and estimation techniques are documented and applied consistently to support reliable and transparent reporting.

Boundary Conditions

Zayo applies the operational control approach when defining organizational boundaries for its GHG inventory. The inventory includes facilities and operations over which Zayo has operational control, including locations where Zayo owns or manages equipment and utilities.

The following table outlines the emissions activities that are both included and excluded from Zayo's GHG Inventory for Reporting Year 2025. Inclusion of scope 1, scope 2 and scope 3 emissions data sources will be reevaluated annually to assess the feasibility, accuracy and materiality on Zayo's inventory. Following the SBTi target submission process, it was determined that Downstream Transportation & Distribution (T&D) wasn't a relevant category. Further, Zayo will assess site operation on an annual basis to determine locations for inclusion in subsequent inventories.

GHG Inventory Inclusions / Exclusions

Emissions Scope	Emissions Source(s)	Materiality
Scope 1	Natural Gas	Material
	Mobile Fuel	Material
	Generators	Material
	Refrigerants	Material
Scope 2	Purchased Electricity	Material
Scope 3	Purchased Goods & Services	Material
	Capital Goods	Material
	Fuel and Energy Related Activity	Material
	Upstream T&D	Material
	Waste Generated	Material
	Business Travel	Material
	Employee Commute	Material
	Upstream Leased Assets	Irrelevant
	Downstream T&D	Irrelevant
	Processing of Sold Products	Irrelevant
	Use of Sold Products	Irrelevant
	End of Life Treatment	Irrelevant
	Downstream Leased Assets	Material
	Franchises	Irrelevant
	Investments	Irrelevant

Greenhouse Gases Included in the Inventory

Zayo's 2025 GHG inventory includes emissions of the greenhouse gases covered under internationally recognized reporting frameworks:

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)

These gases are reported in terms of carbon dioxide equivalent (CO_2e) to provide a standardized measure of overall greenhouse gas emissions.

Global Warming Potential (GWP)

To support consistent emissions reporting, Zayo converts greenhouse gas emissions to carbon dioxide equivalent (CO_2e) using Global Warming Potential (GWP) factors. GWP values reflect the relative warming impact of each greenhouse gas compared to carbon dioxide over a 100-year period. Zayo utilizes the 100-year GWP factors published in the Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report (AR5) for its 2025 GHG inventory.

The table below depicts 100-year time horizon GWP estimates as published in the IPCC Fifth Assessment Report (AR5)[1] as applicable to the primary combustion-related greenhouse gases represented within Zayo's inventory.

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 (SF6) and nitrogen trifluoride (NF3) in Zayo's Inventory– the remaining GHGs required for accounting/reporting by the UNFCCC/Kyoto Protocol in Zayo's operations.

About the Science Based Targets Initiative

The Science Based Targets initiative (SBTi) is a globally recognized organization that enables companies to establish emissions reduction targets aligned with climate science and the goals of the Paris Agreement. SBTi validation confirms that Zayo's emissions reduction targets are consistent with recognized best practices for limiting the impacts of climate change.

SCIENCE BASED TARGETS
DRIVING AMBITIOUS CORPORATE CLIMATE ACTION



About the Science Based Targets Initiative

Zayo has established science-based emissions reduction targets that were validated by the Science Based Targets initiative (SBTi) in 2024 and remain in effect for the 2025 reporting year. These targets provide a framework for reducing greenhouse gas (GHG) emissions across the company's operations and value chain while supporting its long-term net-zero commitment.

Zayo continues to advance emissions reduction initiatives, improve operational efficiency, and expand the use of renewable energy as part of its broader sustainability strategy.

Near-Term Targets

- Reduce absolute Scope 1 and Scope 2 GHG emissions by 97.3% by FY2030 from a FY2020 baseline.
- Reduce absolute Scope 3 GHG emissions by 42% by FY2030 from a FY2022 baseline.
- Maintain annual sourcing of 100% renewable electricity through FY2030.

Long-Term Targets

- Maintain at least a 97.3% reduction in absolute Scope 1 and Scope 2 GHG emissions from FY2030 through FY2045 relative to a FY2020 baseline.
- Reduce absolute Scope 3 GHG emissions by 90% by FY2045 from a FY2022 baseline.

Net-Zero Commitment

Zayo is committed to achieving net-zero GHG emissions across its value chain by FY2045.

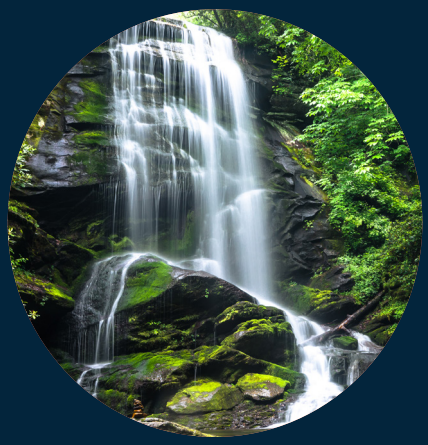


Environmental Policy Statement

Zayo's Commitment: Zayo integrates sustainability considerations into its business operations and decision-making processes. Through responsible environmental stewardship, the company seeks to reduce its environmental impact, support operational efficiency, and create long-term value for customers, employees, investors, suppliers, and the communities it serves.

Zayo's Environmental Objectives: Zayo's environmental strategy focuses on engaging stakeholders and suppliers in responsible business practices that contribute to a more sustainable and resilient future. To support these objectives, Zayo:

- Complies with applicable environmental regulations and seeks to adopt leading practices where appropriate.
- Improves environmental performance through the efficient use of energy, water, and other natural resources.
- Identifies, assesses, and mitigates material environmental impacts associated with business operations.
- Procures energy-efficient and environmentally responsible equipment that aligns with business and customer requirements.
- Reduces landfill waste through recycling, reuse, and responsible disposal programs for electronic and office materials.
- Promotes water conservation and responsible water management practices where applicable.
- Incorporates sustainability considerations into procurement and supplier engagement activities.
- Supports alternative and lower-emission transportation options for employees.
- Optimizes energy efficiency across Zayo-operated facilities.
- Expands digital solutions, including paperless billing and customer documentation options.
- Engages employees, customers, suppliers, and investors through sustainability awareness, education, and collaboration initiatives.



Environmental Practices

UN Sustainable Development Goals

Zayo considers the United Nations Sustainable Development Goals (SDGs) when evaluating sustainability priorities and long-term environmental initiatives. The SDGs provide a globally recognized framework that supports responsible business practices and sustainable development outcomes.



Sustainable Network Infrastructure

Zayo's fiber-based network supports the efficient delivery of digital connectivity while minimizing the physical resources required to support growing bandwidth demand. Fiber infrastructure is durable, highly scalable, and capable of supporting customers' growing demand for high-capacity and efficient digital infrastructure.

Compared with legacy connectivity technologies, fiber networks can provide greater capacity and operational efficiency, supporting the growing demand for digital services while supporting customers' growing demand for efficient and scalable digital infrastructure. Through continued investment in fiber infrastructure, Zayo enables reliable, high-performance connectivity that supports both business growth and long-term environmental stewardship.

Waste Management



Zayo is committed to reducing waste across its operations through responsible resource management, reuse initiatives, and recycling programs. The company prioritizes the responsible disposition of electronic and office materials and seeks opportunities to divert waste from landfills through recycling, refurbishment, and repurposing practices where feasible.

Business Unit	Emissions (mt CO_2e)	Recycled (mt)	Landfilled (mt)	Intensity (mt CO_2e)
North America	314	282	31	0.13
Europe	0.07	0.063	0.007	0.0003
Global reach	N/A	N/A	N/A	N/A
Total	**314**	**282**	**31**	**0.1315**

Water Resource Management



Zayo manages water consumption across its operations and seeks opportunities to improve efficiency through responsible water stewardship practices. These efforts support the sustainable use of water resources while maintaining operational reliability.

Business Unit	Water usage (gallon)	Intensity
North America	93,999,455	0.039
Europe Union	5,148,659	0.022
Global reach	101,279	0.003
Total	**99,249,393**	**0.037**

If you have any questions, please contact Zayo at ESG@Zayo.com.



Appendix A

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The Directors
Zayo Group Holdings Holdings
1401 Wynkoop Street,
Suite 500,
Denver,
CO 80202
USA

28 August 2026

To whom it may concern

The purpose of this letter is to clarify matters set out in the assurance report. It is not an assurance report and is not a substitute for the assurance report.

This letter and the verifier's assurance report, including the opinion(s) therein, are addressed to you and are solely for your benefit in accordance with the terms of the contract. We consent to the release of this letter by you to the CDP in order to satisfy the terms of CDP disclosure requirements but without accepting or assuming any responsibility or liability on our part to CDP or to any other party who may have access to this letter or our assurance report.

In accordance with our engagement contract with you dated **08/12/2025** (the "contract") and for the avoidance of doubt, we confirm that our report "**Zayo Group Holdings, Inc - 2025 CDP Verification Report_Final_Issued_20260828**" to you dated 28/08/2026 (the "assurance report") incorporated the following matters:

1. Boundaries of the reporting company covered by the assurance report and any known exclusions.

Organizational:	Operational management control
Geographic:	The geographical boundary is global, primarily in the USA, and also operating in Canada, United Kingdom, France, Denmark, Netherlands, Germany, Ireland, Sweden, Switzerland, Italy, and Belgium, Japan, China, Singapore and Brazil.

2. Emissions data verified - broken down by Scope 1, Scope 2 and Scope 3 categories with figures given; option to include other relevant data that has been verified with figures.

2025 Emissions Summary (t CO_2e), including RECs			
	Global	**North America**	**Europe**
Scope 1	17,045	14,848	2,191
Scope 2	0	0	0
Scope 3	187,115	182,917	4,150
Total GHG	204,160	197,766	6,341
Water Consumption (kgallons)	99,249	93,899	5,429

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3. Period covered

01 January 2025 – 31 December 2025

4. Verification standard used

Verified pursuant to ISO 14064-3

5. Assurance opinion (incl. level of assurance and any qualifications)

Limited Assurance. Based on the process and procedures conducted, there is no evidence that the GHG assertion 1) is not materially correct and is not a fair representation of GHG data and information, and 2) has not been prepared in accordance with the related International Standard on GHG quantification, monitoring and reporting, or to relevant national standards or practices. A positive verification opinion was issued subject to non-material limitations outlined in the full verification report.

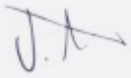
6. Verification provider and accreditations (if relevant)

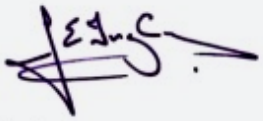
Lucideon CICS is a CDP accredited provider.

7. Lead verifier name and relevant accreditations/professional membership (if relevant)

Jason Monckton, BSc (Hons), PISEP

Signed:





Name:	**Jason Monckton**	**John Ingham**
	GHG Lead Auditor	**Independent Technical Reviewer**
Date:	**18 August 2026**	**26 August 2026**

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Connecting what's next.

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