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Building a Limitless Ireland

Ireland's Blueprint for a Connected and Sustainable Future

The ambitious National Broadband Plan (NBP) is leading Europe's digital transformation, which aims to bridge the digital divide and create a more connected society. Now over five years into the main rollout, National Broadband Ireland (NBI) has made significant progress, surpassing delivery targets. By the end of our 2024 contract year*, NBI passed 337,440 premises, with approximately 60% of the State's Intervention Area ready to connect. By 2024, the project had already connected 114,386 homes, farms, and businesses, with take-up rates exceeding original projections, as well as international comparisons. This transformation is unlocking the economic potential of rural Ireland and enabling tens of thousands to work remotely, supporting a work-life balance. This shift in how and where people live and work reinforces the importance of embedding sustainability into every aspect of the rollout.

NBI's progress is built on a strong foundation of Environmental, Social, and Governance (ESG) principles. By integrating ESG into our operations, we are not only delivering cutting-edge digital infrastructure but also ensuring long-term sustainability, responsible business practices, and positive social impact. Through strategic stakeholder engagement and a strong focus on customer service, we are bridging rural-urban gaps, transforming lives, empowering businesses, and setting a benchmark for sustainable digital infrastructure worldwide.

'NBI's contract year with the Irish State runs to 31st January



MESSAGE FROM THE CEO'S



2024 marked a pivotal year in NBI's sustainability journey, strengthening our positive social impact across rural Ireland. By embedding sustainability into our core operations, we are enhancing efficiencies, building stakeholder trust, and future-proofing our network against climate challenges.

This year, we made meaningful progress toward our sustainability goals, while aligning our measurement and reporting with the GHGP Corporate Standard. Through resilient materials, energy-efficient power solutions and resilient network design, we are ensuring sustainable digital connectivity for years to come.

Looking ahead to 2025, NBI remains committed to driving lasting impact—not just through our network deployment, but in how we operate every day. By integrating sustainability across our business, we are shaping an economy that benefits the environment, our communities, and future generations.

Thank you for your continued trust and support as we work together to build a limitless Ireland.

Peter Hendrick,

CEO National Broadband Ireland, Infrastructure



The National Broadband Plan (NBP) is transforming Ireland's connectivity, ensuring high-speed broadband for every farm, school, business, and home. NBI remains on track to deliver a modern network that supports both current and future generations.

In 2024, we strengthened our ESG commitments and ensured our operations align with evolving standards. We advanced info security, energy, health and safety through ISO recertification and require the same high standards across our build partners.

NBI is dedicated to delivering the NBP while creating lasting value for stakeholders, reinforcing environmental sustainability, social equity, and responsible governance.

As we bridge the digital divide, we remain committed to a sustainable and inclusive future. Our work goes beyond infrastructure delivery and wholesale broadband — our network supports remote work, digital education, telehealth, and rural economic development, helping to bridge Ireland's digital divide and strengthen community resilience. In 2025, we will further embed sustainability across our operations.

TJ Malone,

CEO National Broadband Ireland, Deployment

NBI AT A GLANCE

NBI is responsible for delivering high-speed broadband infrastructure to over 1.1 million people in rural and underserved areas. In partnership with the State, NBI ensures those in the NBP Intervention Area have access to broadband, supporting digital inclusion.

NBI provides wholesale broadband infrastructure to over 50 Broadband Service Providers, fostering competition, affordability, and service innovation.

Our network enables remote work, digital education, telehealth services, and rural economic development, bridging Ireland's digital divide.

Company Structure

To effectively manage the delivery of the NBP in the State's intervention area, NBI is structured into two specialised entities:



NBI Infrastructure DAC

Oversees connections to the network, infrastructure management, and long-term operation.





NBI Deployment DAC

Manages network rollout, including planning, design, and construction, in collaboration with contractors and suppliers.

This structure ensures efficient deployment while maintaining operational excellence.

DELIVERING THE NATIONAL BROADBAND PLAN

Bringing Connectivity and Opportunity to Rural Ireland

The rollout of high-speed broadband under the NBP is ahead of the contractual schedule and is transforming rural communities.

To date (31st Jan 2025), NBI has passed 337,440 premises, with c. 60% of the State's Intervention Area ready to connect. The rollout phase of the project remains on track, with 91% of premises (513,425) either constructed or under construction. Demand continues to grow, with 114,386 premises already connected to the NBI fibre network. Additionally, 955 broadband connection points have been installed, including 672 in schools, while connectivity is scheduled for 27 Irish islands, with 10 now online.

Reliable connectivity enables thousands to work remotely, reducing commuting times and lowering transport emissions. Farmers are adopting smart technologies to boost productivity and resource efficiency, while rural entrepreneurs are accessing global markets, fostering economic resilience. As we continue driving these benefits, we are beginning to scope out how to measure their impact and will disclose our progress in next year's report.

By enabling digital inclusion, we are reducing rural isolation, supporting lifelong learning, and ensuring every community can participate in Ireland's digital economy. With almost 60,000 km of fibre cable laid — more than enough to circle the Earth — NBI is helping close the rural-urban digital divide. While our infrastructure spans an immense scale, careful environmental assessments have ensured biodiversity protection and responsible waste management, reinforcing our commitment to sustainable development. Residents of areas like the Black Valley in Co. Kerry, the last community to receive mains electricity, now have broadband speeds on par with major cities, unlocking opportunities unimaginable a generation ago.













Impact KPIs	2023	2024
Cumulative homes passed by fibre networks	216,898	337,440
Cumulative homes connected by fibre networks	69,130	114,386
Cumulative km of fibre networks installed	35,223km	59,004km

Award-Winning Innovation Driving Connectivity

In 2024, NBI received the prestigious Glotel Award for Excellence in Fixed Network Evolution, recognising our leadership in telecom infrastructure. This award underscores our commitment to delivering one of the world's most ambitious fibre broadband rollouts, connecting rural homes, farms, and businesses across Ireland.

Our future-proof network matches or exceeds urban broadband speeds, ensuring high-quality service while adhering to strict project timelines and budgets.

As an open-access, wholesale provider, NBI enables over 50 Broadband Service Providers to offer services on our network, promoting market competition and consumer choice. Beyond connectivity, our award-winning network supports remote work, digital education, smart farming, and rural businesses, creating a foundation for economic resilience and sustainable development.

Winning this award reinforces NBI's vision: delivering world-class digital infrastructure, helping Ireland transition to a low-carbon, inclusive digital economy, and serving as a model for other countries tackling rural connectivity challenges.



Our Approach To Sustainability

Our Purpose

We're connecting Ireland to promote a sustainable, inclusive future. By providing equitable access to broadband, we drive digital inclusion, foster economic growth, and enable environmental efficiency, laying the foundation for a thriving and resilient society.

Our Role

We are delivering a fibre network in the State's Intervention Area (IA) as part of the National Broadband Plan, one of Europe's most ambitious infrastructure projects. ESG principles are embedded into every aspect of our operations to ensure responsible, forward-looking delivery.

Why It Matters

Broadband is more than just a utility—it is a critical enabler of digital inclusion, economic growth, and environmental sustainability by enabling remote work, smart technologies, energy efficiency, and sustainable resource management. By ensuring equitable access, we address Ireland's connectivity challenges while advancing a more inclusive society.



INTRODUCTION

NBI's Sustainability Statement for fiscal year 2024 is broadly aligned with the European Sustainability Reporting Standards (ESRS), guided by the recommendations of the European Financial Advisory Group (EFRAG), in support of the Corporate Sustainability Reporting Directive (CSRD). It provides stakeholders with a clear overview of our sustainability performance, including material impacts, risks, and opportunities (IROs) across our value chain.

At NBI, we embrace a holistic approach to sustainability by applying the principle of double materiality—assessing both impact materiality and financial materiality through our Double Materiality Assessment (DMA). This approach enables us to embed sustainability across our operations, with a focus on ethical governance, stakeholder engagement, and the identification of material Impacts, Risks, and Opportunities (IROs) to inform our Policies, define Actions, and set Targets (PATs).

This section outlines the basis and scope of the sustainability-related metrics disclosed in this report, demonstrating how ESG integration supports NBI's strategic objectives and strengthens the resilience of our broadband infrastructure development in Ireland.



Report Structure

General Disclosures

This section introduces our strategic sustainability framework, detailing how value chain insights and IRO management inform decision-making across the business. By embedding ESG considerations into core operations and aligning this statement with the ESRS framework, we ensure our approach to managing material impacts, risks, and opportunities is structured, comparable, and responsive to delivering large-scale, long-term national broadband infrastructure.



Environmental

This section highlights NBI's strategies for emissions reduction, environmental management, and resource efficiency throughout the lifecycle of our network development and operational assets. We focus on minimising the environmental impact of our infrastructure projects, from construction to ongoing maintenance, while ensuring alignment with national and international sustainability goals.



Socia

This section discusses NBI's commitments to DEI, workforce safety, and community engagement. We detail our efforts to foster an inclusive and equitable work environment and highlight how we support local communities, particularly in rural and underserved areas, while promoting digital inclusion and access to high-quality broadband for all.



Governance

This section outlines NBI's commitment to ethical business practices and a culture of integrity. We review our approach to managing business conduct and corporate culture, including governance processes and oversight mechanisms to mitigate risks such as corruption, bribery, and unethical behaviour. Our adherence to the Code of Conduct ensures transparency, accountability, and responsibility in all our business dealings.

BASIS FOR PREPARATION OF SUSTAINABILITY STATEMENT

This statement has been prepared with reference to the European Sustainability Reporting Standards (ESRS), informed by the guidance and implementation framework provided by the European Financial Reporting Advisory Group (EFRAG) in support of the CSRD. Our approach reflects a phased alignment, focusing initially on core disclosures most relevant to our activities, while enabling future enhancements as reporting expectations continue to evolve.

In 2024, NBI adopted a phased implementation strategy, aligning with the ESRS at a foundational level and prioritising the most material disclosures identified through our Double Materiality Assessment. This staged approach supports and establishes a framework for more impact measurement in future reporting cycles.

In parallel, we draw on the United Nations Sustainable
Development Goals (SDGs) to guide our broader
sustainability ambitions and to articulate our contribution
to global priorities. A detailed overview of our SDG alignment
is provided later in this section.

Changes Affecting ESG Data in 2024

To ensure the quality and transparency of our ESG disclosures, we apply the following reporting principles:

• Double Materiality

We assess ESG topics through both financial and impact lenses, ensuring a comprehensive view of risks and contributions.

Relevance

We prioritise disclosures that reflect our most significant ESG impacts and stakeholder concerns.

Accuracy & Completeness

We uphold data integrity through validation and analysis.



Comparability

Consistent methodologies enable meaningful benchmarking across the industry.

Clarity & Accessibility

We present ESG data in a structured, straightforward manner.

Balance

Our reporting highlights both achievements and areas for improvement.

Responsiveness

Stakeholder feedback informs our evolving approach.

Consistency

Annual reporting drives continuous improvement in ESG quality and audit readiness.

Data Collection and Measurement

To ensure accurate and reliable ESG disclosures, NBI tracks and analyses both quantitative and qualitative data across our operations. This includes:

- Environmental Data: Energy consumption, greenhouse gas emissions, and resource use, captured to ensure accuracy and completeness.
- Social Data: Workforce diversity, employee engagement, health and safety, and community investment, assessed in line with stakeholder priorities.
- Governance Data: Governance structures, ethical conduct, risk management, and compliance, supporting consistency and transparency over time.

Our data collection processes align with the reporting principles outlined in the previous section, reinforcing our commitment to transparency, relevance, and continuous improvement.

Transparency and Accountability

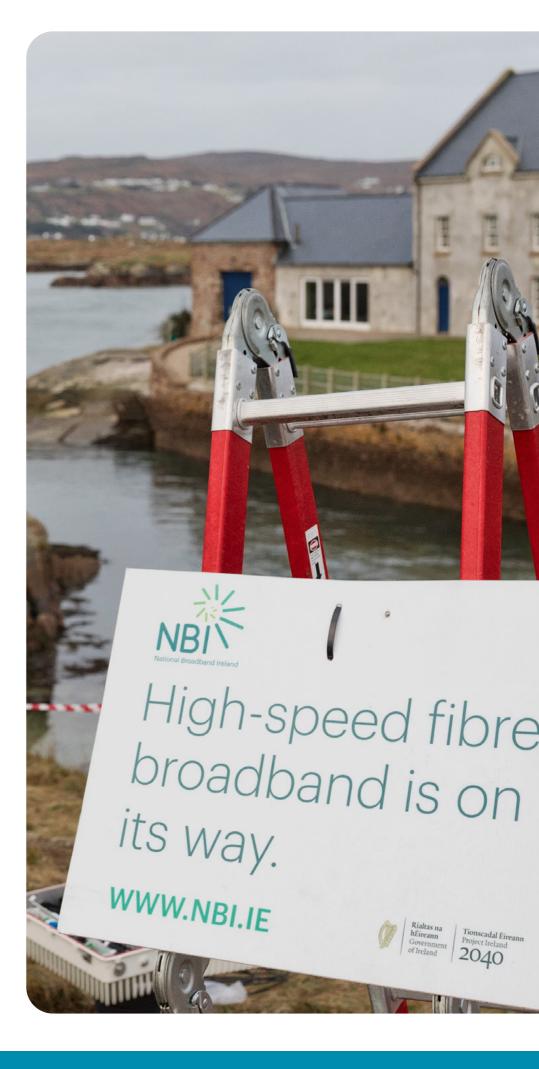
We prioritise ESG topics with significant financial, social, and environmental impacts, ensuring our reporting remains material, clear, and accessible. By maintaining consistent methodologies and using verifiable data, we enable meaningful benchmarking within our industry and informed decision-making.

This approach underpins our foundational alignment with the ESRS and helps strengthen sustainability performance for future reporting cycles, ensuring continuous improvements and greater value creation for all stakeholders.

Forward-Looking Statements

Some disclosures in this report contain forward-looking statements regarding NBI's anticipated ESG performance. These statements are based on current expectations and assumptions, which are subject to change as our strategy continues to evolve. As such, they should not be interpreted as firm commitments.

To support informed interpretation, we outline the key assumptions and influencing factors behind these projections. While aligned with our long-term ambitions, NBI's due diligence framework is designed to identify, assess, and manage ESG-related impacts, risks, and opportunities (IROs) in a dynamic context. This enables our approach to remain adaptable to emerging issues, regulatory developments, and evolving best practices—supporting responsible infrastructure delivery across Ireland.





STATEMENT ON DUE DILIGENCE

NBI embeds sustainability into all areas of our business through a structured due diligence framework. This enables us to identify, assess, and manage environmental, social, and governance (ESG) impacts, risks, and opportunities (IROs) in alignment with our corporate strategy and long-term goals.

Due Diligence Framework:

1. Risk Assessment Framework:

Aligned with ISO 45001 (Occupational Health and Safety Management Systems) and ISO 14001 (Environmental Management Systems), applying structured criteria to identify and evaluate ESG risks across NBI's operations.

2. Identification of Impacts:

Identifies actual and potential adverse impacts on the environment and people, with strategies to prevent or mitigate sustainability-related risks.

3. Risk and Opportunity Identification:

Assesses ESG risks and opportunities with implications for financial performance and long-term resilience, embedding findings into governance and risk management systems.

4. Materiality Assessment:

Conducts Double Materiality Assessments in accordance with the European Financial Reporting Advisory Group (EFRAG) guidance, addressing both financial materiality (impact on NBI) and impact materiality (impact on society and the environment).

5. Stakeholder Engagement:

Engages diverse stakeholders to inform our ESG priorities and provides regular, transparent updates on progress and outcomes.

6. Continuous Monitoring and Improvement:

Monitors emerging ESG risks and regulatory developments to ensure ongoing alignment with best practices and continuous improvement.

7. Governance and Accountability:

Integrates ESG due diligence into policies and risk management, with board-level oversight and regular reviews to uphold accountability and reflect evolving expectations.

The insights gained through our due diligence directly inform our ESG priorities, ensuring they are embedded across our operations—from strategic planning to day-to-day execution.

BUSINESS MODEL & VALUE CHAIN

Driving Digital Transformation

NBI plays a key role in advancing digital inclusion by delivering high-speed broadband infrastructure to underserved communities across Ireland. Our strategic vision is rooted in delivering sustainable digital infrastructure and equitable access to connectivity. Our efforts support national objectives for digital inclusion, rural development, and climate resilience, as outlined in Ireland's National Digital Strategy and Climate Action Plan. This vision is underpinned by transparency, stakeholder collaboration, and a commitment to reducing environmental impact across our operations.

Through a foundation of transparency and stakeholder collaboration, we integrate sustainability into all aspects of our operations, promoting resilient infrastructure and socio-economic equality. Our approach creates shared value and ensures that our digital transformation efforts contribute to long-term environmental, social, and economic benefits.

Our Value Chain Connecting Rural Ireland

NBI's business model and value chain are designed to deliver reliable, future-proof broadband while embedding sustainability and resilience across all activities. Our operations focus on key processes and relationships that drive network expansion and stakeholder engagement.

Upstream Value Chain

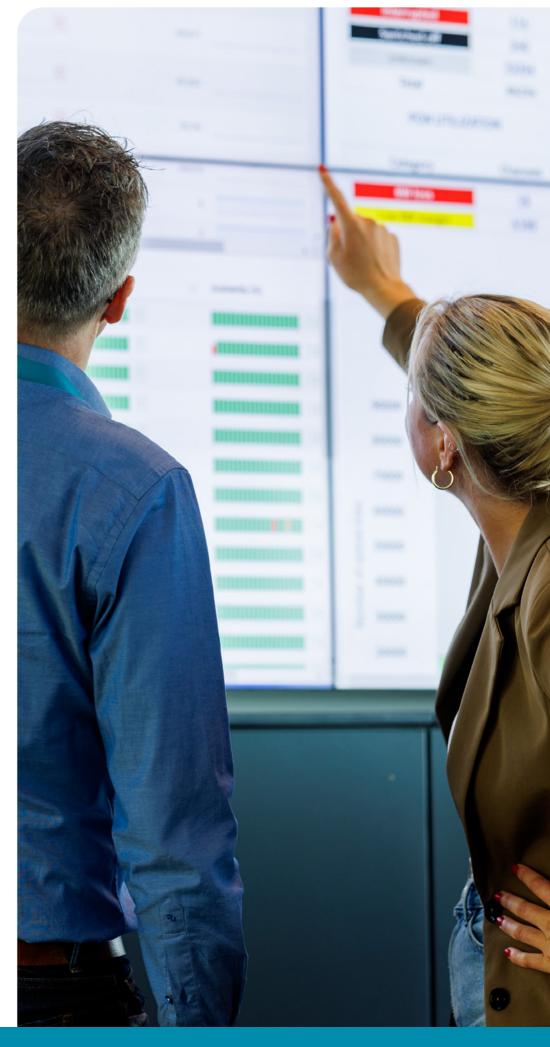
Includes the procurement and deployment of network infrastructure, where we aim to reuse existing assets where feasible, manage supplier relationships responsibly, and integrate sustainable practices into network design and installation. These efforts help reduce environmental impacts and ensure our suppliers align with NBI's ESG standards.

Downstream Value Chain

Focused on wholesale access services for Broadband Service Providers, supporting network reliability and the delivery of digital connectivity to end users.

Sustainability is embedded throughout our value chain, aligning our mission of digital inclusion with responsible business practices. By integrating ESG considerations into strategic decision-making and maintaining strong stakeholder engagement, we ensure alignment with best practices and enhance the resilience of our operations.

To further support this integration, NBI has conducted a Double Materiality Assessment (DMA) to identify the most significant impacts, risks, and opportunities (IROs) shaping our long-term strategy.



DOUBLE MATERIALITY ASSESSMENT (DMA)

Process to Identify Material IROs

NBI uses a structured, data-driven process to identify and prioritise the most significant impacts, risks, and opportunities (IROs) across our operations and value chain. This approach aligns with EFRAG guidance and Grant Thornton's methodology, covering both:

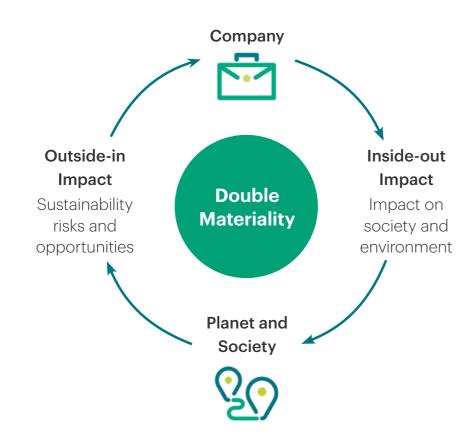
- Impact Materiality: Effects on people, planet, and society.
- Financial Materiality: Effects on NBI's financial performance and resilience.

We integrate stakeholder engagement to prioritise issues based on combined materiality scores, as well as robust data collection and analysis.

NBI applies a comprehensive lens to double materiality by evaluating:

- Inside-Out Impacts: Financial effects of our operations on the environment and society.
- Outside-In Risks: Sustainability-related risks in the value chain or external environment that could impact NBI's financial position.

We assess both actual and potential IROs—including those not immediately material—to future-proof our strategy and respond proactively to change.





Review Previous Assessment

2 Stakeholder Engagement

3 Materiality Assessment

Documentation and Validation

5 Integrate DMA Findings

Revisit the 2023 materiality matrix to identify new and emerging topics, ensuring alignment with our business strategy and evolving ESG regulations.

Consult internal experts and external stakeholders—including suppliers, customers, employees, and community groups—to gather input and validate relevance.

Evaluate ESG-related IROs using both qualitative and quantitative data. Consider topics such as climate risks, social equity, governance, and business continuity. Prioritise based on combined impact and financial relevance.

Present findings to the Senior Management Team for feedback and approval. Update the materiality matrix to reflect confirmed priorities.

Finalise the assessment and align with our ESG strategy. Define KPIs and targets to support performance tracking and audits.

This process informs NBI's disclosures, ensuring regulatory compliance while reinforcing our commitment to sustainability, transparency, and accountability.

Key Evaluation Criteria

To prioritise IROs, we apply the following factors across short (0–2 years), medium (3–5 years), and long-term (5+ years) horizons:

1. Impact Materiality:

Effects on people, the environment, and society, assessed by:

Impact Type: Actual or potential, direct or indirect, positive or negative.

Scale, Scope & Irremediability: Extent, reach, and severity of the impact.

Likelihood: Probability of occurrence across time horizons

Value Chain Location: Where the impact occurs—upstream, own operations, or downstream.

Human Rights Impact: Alignment with the UN Guiding Principles on Business and Human Rights.

2. Financial Materiality:

Likelihood and magnitude of potential financial impacts.

Material Dependencies: Critical relationships and resources NBI relies on to operate and deliver services.

How We Assess Financial Materiality

Financial materiality focuses on how sustainability-related risks and opportunities can affect our financial performance—both directly (e.g. operational costs, compliance) and indirectly (e.g. reputational risks, long-term resilience).

We evaluate each IRO using two key factors:

Magnitude of Potential Financial Impact

How significant the financial consequences could be across our value chain.

Likelihood of Occurrence

The probability of the IRO happening over the short, medium, or long term.

This assessment is aligned with our enterprise risk management thresholds and helps guide resource allocation, ensuring informed decisions that support long-term financial stability and sustainability goals.

Role of Stakeholder Engagement

Stakeholder engagement plays a vital role in identifying material issues. We tailor engagement based on the influence of each stakeholder group:

- User Stakeholders (e.g. Broadband Service Providers, and End Users): Engaged via annual surveys and support channels, focusing on service quality, satisfaction, and customer retention—all key drivers of financial performance.
- Affected Stakeholders (e.g. Suppliers, Government Bodies, and Local Communities): Engaged more frequently through bi-annual reviews, quarterly meetings, and workshops. These discussions focus on compliance, environmental performance, and social responsibility factors with direct financial implications.



Key Stakeholders in IRO Assessment

- Employees.
- Broadband Service Providers, otherwise known as Retail Service Providers (RSPs).
- Suppliers and contractors.
- Local communities via County Councils and Local Authorities.
- Government agencies.
- Local workforce representatives.

Ongoing, structured engagement with these groups ensures that our materiality assessment stays aligned with the real-world issues that could influence our cost base, regulatory exposure, and ability to deliver on our commitments.

How We Engage Stakeholders

We use a variety of methods, including surveys, interviews, and consultations, to gather input from those most impacted by our operations. The Senior Management Team (SMT), directors, and managers collaboratively identify material IROs (impacts, risks, and opportunities), with final approval and oversight from the Audit and Risk Committee (ARC) and Board of Directors (BOD) to ensure alignment with our strategic goals.

This collaborative approach validates the materiality of key sustainability issues, shaping our reporting and strategy.

Key Elements of Our Engagement Process

- Stakeholder Mapping & Prioritisation: Identify and prioritise stakeholders based on their influence and impact on NBI.
- **2.** Engagement Methods: Tailored engagement strategies for each group to ensure effective communication.
- **3.** Feedback Mechanisms: Use online portals and community liaison to gather feedback.
- **4.** Transparency & Reporting: Regular, detailed reporting on how stakeholder feedback informs our strategy.

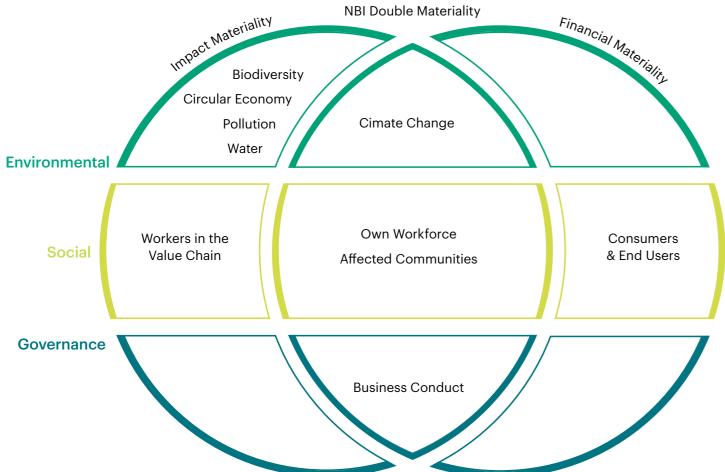
Following EFRAG's guidance, we classify stakeholders into two main groups, each engaged according to their influence and impact on our business model:

- User Stakeholders: Broadband Service Providers, End Users.
- Affected Stakeholders: Suppliers, Government, Local Communities.

Stakeholder Group	User Stakeholders (e.g. Broadband Service Providers, End Users)	Affected Stakeholders (e.g., Suppliers, Government, Local Communities)
Interest	Reliable, affordable internet, service quality	Fair contracts, compliance, environmental impact
Engagement Methods	Annual surveys, online portals, ongoing support	Bi-annual reviews, quarterly meetings, community consultations







Integration of Stakeholder Insights into Strategy

Stakeholder feedback directly informs our business strategy and sustainability initiatives. For example:

Digital Inclusion

Community feedback on bridging the rural digital divide led to support for the RISE Community Fund, helping rural Ireland access technology.

Environmental Impact

Adjustments to construction schedules minimised disruption and reduced environmental harm based on local community feedback.

• Supply Chain Transparency

Supplier feedback helped refine contract terms, improving fair compensation, timely payments, and safety standards.

By integrating stakeholder insights, we ensure that our decisions align with both business goals and stakeholder expectations. This ongoing engagement strengthens our mission to build a more inclusive, responsible business.

DMA Findings: Key Material IROs

Key material IROs identified that are critical to NBI's long-term strategy and success include:

Embedding DMA into Strategy

Through the Double Materiality Assessment, NBI ensures that sustainability-related IROs are:

- · Proactively identified and monitored.
- Closely aligned with stakeholder expectations.
- Integrated into strategic decision-making.
- Anchored in responsible governance practices.

This enables us to strengthen business resilience while delivering on our long-term ESG commitments.

Below is a summary of the material impacts, risks, and opportunities that directly influence NBI's operational decisions, market strategies, and sustainability initiatives driving performance:



Environmental:	SDG	Matarial Impact	Material Risk	Matarial Opportunity	Value Chain	Time Horizons		
Climate Change	SDG Material Impact Material Risk Material Opportu		Material Opportunity	Location	Short	Medium	Long	
E1-1: Climate Change Adaptation Network resilience	•	Potential Negative: Repair costs, performance penalties, and revenue loss due to storm-related disruptions.	Risk of increased repair costs and revenue loss if climate resilient infrastructure is not built.	Ongoing improvements in Business Continuity and Disaster Recovery, along with the development of a Climate Adaptation Plan, contribute to emission reductions in line with Ireland's Climate Action Plan and EU targets.	Own operations	•	•	•
E1-3: Energy Network technology efficiency	• •	Actual Positive: NBI's network technology is more efficient than legacy systems.	Effective controls in place, and thresholds determined that ensure risks remain manageable.	Procurement of 100% renewable energy, supporting energy security, efficiency, and long-term cost reduction.	Own operations	•	•	•
Social:	SDG	Material Impact	Material Risk	Material Opportunity	Location	Tim	Time Horizons	
Own Workforce	000	Material impact	Waterial Nok	Material Opportunity		Short	Medium	Long
S1-1: Secure Working Conditions Employee well-being & safety	•	Potential Positive: NBI is committed to a zero-harm workplace, aligning with ISO 45001 standards to ensure a safe and healthy environment.	Risk of workplace injuries and mental health challenges impacting productivity. Upholding high ethical labour standards across our business to mitigate risks related to workforce conditions.	Enhancing workplace safety culture through training, leadership commitment, and well-being initiatives. – Investing in continuous learning and leadership development to future-proof our workforce. Addressing skill shortages and enhancing talent development to ensure business continuity and innovation.	Own operations	•		
S1-2: Equal Treatment and Opportunities for All Diversity and inclusion (DEI)	• •	Actual Positive: Promoting diversity and inclusion in the workplace.	Risk of increased workplace dissatisfaction if equal opportunity policies are not effectively implemented.	Fostering a diverse and inclusive workplace to drive innovation, enhance employee satisfaction, and improve performance. This opportunity is actively being pursued through ongoing diversity initiatives and inclusive hiring practices.	Own operations		•	•
S1-3: Other Work- Related Rights Hybrid work and well-being	•	Actual Positive: Enhancing work-life balance, safety, and mental health.	Risk of lower employee morale and productivity if communication and work-life balance are neglected.	Offering flexible hybrid work arrangements to improve employee well-being and satisfaction. We are leveraging this opportunity by expanding work-life balance options for employees.	Own operationstable	e continue	ed on the n	ext page

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Social: Affected	SDG	Material Impact	Material Risk	Matarial Opportunity	Value Chain	Tim	Time Horizons		
Communities	300	Material Impact	Material Kisk	Material Opportunity	Location	Short	Medium	Long	
S3-1: Communities' Economic, Social and Cultural Rights Broadband access & community connectivity	• •	Potential Positive: Expanding broadband access to underserved communities, driving digital inclusion, and stimulating economic growth.	No material risk identified: Effective controls and ongoing assessments ensure minimal risks.	Leveraging digital connectivity to empower rural and underserved communities, enabling education, remote work, and economic resilience.	Downstream		•	•	
Governance:	SDG	Material Impact	Material Risk	Material Opportunity	Value Chain	Tim	Time Horizons		
Business Conduct		·		,	Location	Short	Medium	Long	
G1-1: Corporate Culture	•	Actual Positive: Strong culture of loyalty and ethical behaviour.	Risk of ethical breaches and employee disengagement if corporate culture weakens.	Strengthening corporate culture to promote ethical behaviour, loyalty, and employee engagement. We actively pursue this opportunity by prioritising ethics training and cultivating a transparent corporate culture.	Own operations		•	•	
G1-5: Fair Supplier Relationships	• •	Potential Positive: Strengthening supply chain resilience.	Risk of disruptions in supply chains if supplier relationships are weak.	Establish fair supplier criteria and collaborations by applying transparent selection processes, supporting ethical partnerships, and embedding human rights, labour, and environmental standards across the value chain.	Upstream		•	•	

IROs Interaction with Strategy and Business Model

Sustainability is integral to NBI's strategy and business model. Aligned with our purpose and guiding principles, our ESG strategy proactively manages impacts, risks and capitalises opportunities arising from our operations. This strategy enables us to achieve our vision through the following strategic pillars:

- Partnering with sustainable investors and stakeholders who share our core values and objectives.
- 2. Ensuring business resilience to climate change, aligned with our pathway towards Net-Zero by 2050.
- **3.** Empowering our design, build, supply chain, and connections to act responsibly and ethically, creating long-term sustainable value.
- **4.** Developing innovative solutions and capitalising sustainable opportunities.
- Implementing a feedback loop of regular ESG monitoring and reporting for continuous improvement.

Understanding the interdependencies between impacts, risks, and opportunities (IROs) strengthens our strategic decision-making. For example:

- Climate-related risks and supply chain disruptions can compound, affecting infrastructure resilience and supplier relationships.
- Integrating IROs into planning ensures sustainability considerations are embedded in our long-term corporate strategy.

Proactively addressing IROs enhances the resilience and reliability of our services. Our decarbonisation strategy, targeting Net-Zero emissions by 2050, mitigates regulatory, physical, and market transition risks. Climate change risk assessments inform infrastructure adaptation measures, ensuring service continuity under extreme weather conditions. Together, these efforts help safeguard our operations while protecting the interests of our stakeholders.

This holistic approach enables us to proactively manage risks, capitalise on opportunities, and create shared value for our business and society. Through the integration of IROs into NBI's business model, we align with the broader objectives of the EU Green Deal—accelerating the green transition, promoting climate resilience, and contributing to a just and inclusive transformation of Europe's economy.

Building on the integration of IROs into our core strategy, the next step is to ensure that these risks and opportunities are effectively managed across NBI's value chain. This approach enables us to align our sustainability efforts with all stakeholders and ensure a comprehensive, cohesive strategy throughout our operations.

Managing IROs Across NBI's Value Chain

NBI integrates sustainability into every stage of its operations to mitigate risks, reduce environmental and social impacts, and create long-term value. To the right is an overview of our approach to managing IROs across the value chain.

By embedding sustainability into every stage of the value chain, NBI reduces its carbon footprint, manages resources responsibly, and promotes energy efficiency while ensuring universal, affordable broadband access. Through strategic partnerships and resilient digital infrastructure, NBI is laying the foundation for a greener, more inclusive Ireland.



- Upstream: Responsible Infrastructure Development

Network Design

Risk: Land disruption, regulatory non-compliance.

Management: Environmental assessments and prioritisation of energy-efficient, low-impact designs.

Procurement

Risk: Sourcing, supplier carbon footprint.

Management: Supplier audits, and circular economy principles.

Deployment

Risk: Carbon emissions, worker safety, labour conditions.

Management: Uphold health, safety, and environmental standards, ensuring fair working conditions for subcontractors.



Downstream: Sustainable Broadband Access

Wholesale Broadband Access

Risk: Digital inequality, network reliability.

Management: Connecting underserved communities and enhancing network resilience.

Service Provision

Risk: Indirect environmental impact from increased energy consumption associated with broadband use.

Management: Our provision of broadband in rural homes enables end-users to work from home, reducing commuting-related emissions—an inadvertent environmental benefit of our product.

Network Operations

Risk: Operational inefficiencies, rising energy demands.

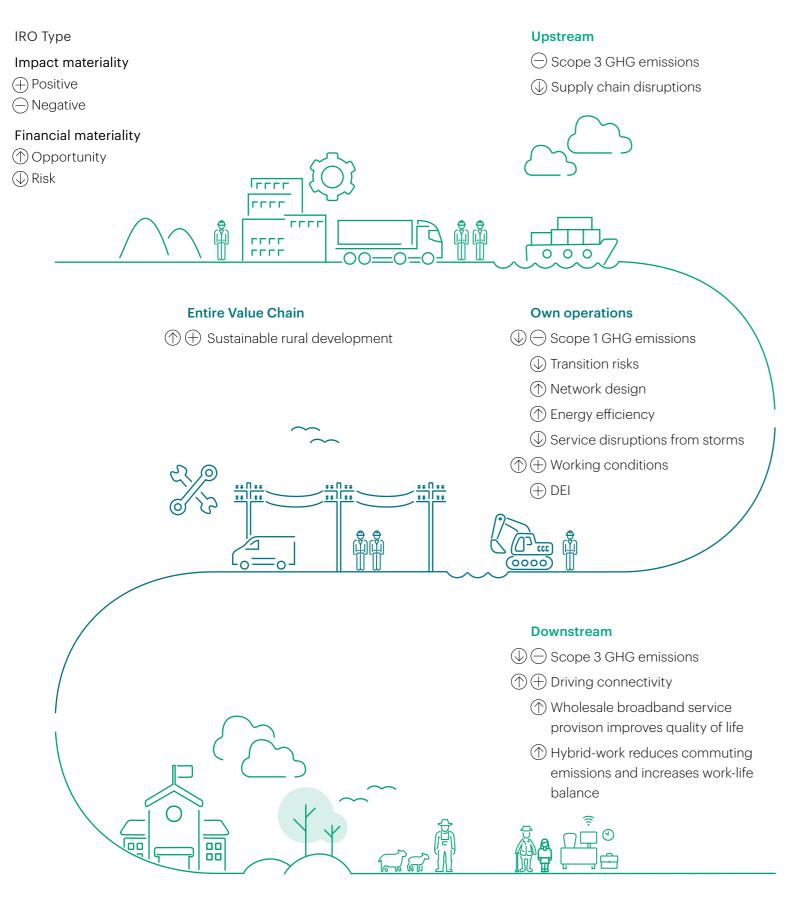
Management: Invests in renewable energy, system upgrades, and energy-efficient technologies to reduce emissions and extend asset lifespan.

Network Assurance

Risk: Service disruptions, cybersecurity threats, network reliability issues.

Management: Continuous monitoring, proactive maintenance, cybersecurity measures, and resilience planning to ensure uninterrupted, secure service.

Impacts, Risks & Opportunities



Continuous Monitoring and Review

NBI regularly monitors sustainability trends, regulatory changes, and stakeholder expectations to keep our IROs relevant and adaptable. Through our DMA process, we ensure our ESG efforts stay aligned with evolving contexts. By promoting collaboration and responsible practices, we aim to create long-term value for our company, stakeholders, and society. This ongoing review strengthens our sustainability efforts and builds resilience for lasting positive impact.

This commitment to continuous improvement keeps us aligned with global sustainability efforts and supports the broader agenda for sustainable development. In this context, we now turn our focus on how NBI's sustainability efforts contribute to the United Nations Sustainable Development Goals (SDGs).

ALIGNMENT WITH THE UN SUSTAINABLE DEVELOPMENT GOALS

As we advance our environmental, social, and governance (ESG) goals, we recognise the importance of aligning our efforts with global sustainability frameworks. Beyond our internal targets, we are committed to supporting the United Nations Sustainable Development Goals (SDGs)—a universal call to action for a more sustainable and equitable world. This alignment embeds our impact within a broader global movement, driving systemic change across industries and communities. Our SDG priorities include:

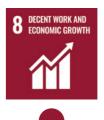
SDG	NBI Contribution
5: Gender Equality	Promote equal opportunities, fair pay, and inclusive leadership.
8: Decent Work & Economic Growth	Drive job creation, fair labour standards, and employee well-being.
9: Industry, Innovation & Infrastructure	Expand broadband access to underserved communities.
13: Climate Action	Implement science-based emissions reduction and climate adaptation strategies.

To further our commitment to sustainability, we have set key ESG goals that align with both our internal objectives and the broader global sustainability agenda. These goals reflect our

dedication to making a tangible, positive impact on both our operations and the communities we serve. Our key ESG commitment goals include:

LEGEND FOR SUSTAINABLE DEVELOPMENT GOALS (SDG):











	Commitment	ESG Goals	Contributing to UN SDGs
Environmental	Act on climate change by being Carbon Neutral by 2035 .	Be Carbon Neutral for our own direct operations by 2030. Be Carbon Neutral across our supply chain by 2035.	
Enviror	Become a Net-Zero business by 2050 .	We pledge to becoming a Net-Zero business ahead of 2050. Maintain ISO 50001 (Energy Management) certification.	
	Connect 564,000+ homes, farms, schools and businesses.	Create direct and indirect employment. By providing broadband in rural Ireland where there is poor/no broadband, we benefit local businesses, schools and community groups. Connect 1.1M people to high-speed broadband, empowering communities and business for economic growth.	
	Support digital inclusion in our communities.	Have our broadband network available 99.9% of the time.	
Social	Invest in our talent and enhance a diverse, inclusive and hybrid work environment.	Continue to actively engage in a range of activities to promote and develop our diverse workforce, including gender, nationality, age, educational background, social background and sexual identity. Through NBI's colleague and community engagement programme, continue to invest in our talent and enhance a diverse, inclusive and hybrid work environment.	
	Continue to maintain our health and safety metrics and empower our contractors to do the same.	Having embedded ISO 45001 and ISO 14001 in our organisation, NBI is driving higher H&S standards across the delivery of the NBP by ensuring our build contractors are all accredited to the same ISO standard.	
	Community engagement.	Address the rural digital divide with monthly grants to empower local groups to enhance their digital strategy.	
Governance	Foster diverse and accountable governance.	Maintain best-in-class corporate governance.	
	Maintain strong data governance.	Continue to actively manage and maintain strong data governance.	
ŏ	Maintain high ethical standards at all times.	Ensure that 100% of employees are trained and signed up to NBI's Code of Conduct.	

Looking Ahead:

Our Commitment to Continuous Improvement

Building on our alignment with the UN SDGs, we recognise that achieving meaningful and lasting change requires ongoing effort, innovation, and collaboration. With this in mind, we are dedicated to continuously refining our strategies and actions to meet the evolving challenges of sustainability.

As part of this commitment, we uphold transparency and accountability in how we measure and report our progress.



TRACKING OUR PROGRESS

As we continue expanding broadband access, we are deepening our commitment to sustainability. Our impact goes beyond connectivity—driving education, economic growth, and community development. By embedding ESG principles into our operations, we create lasting value for our stakeholders while contributing to a more inclusive future.

Environmental, Social, and Governance (ESG) at NBI

At NBI, ESG strategy is embedded into our operations. Guided by our double materiality assessment, we prioritise environmental responsibility, social impact, and strong governance to drive meaningful change. Through innovation, collaboration, and responsible business practices, we are shaping a more resilient and equitable future.

Environmental

We address key environmental challenges by investing in initiatives that align with our double materiality assessment. This includes developing a transition plan to reduce our carbon footprint and strengthening climate resilience and promoting circular economy principles across our value chain. By setting time-bound targets, and integrating sustainability into decision-making, we are committed to making a measurable impact in the transition to a low-carbon economy.

Our Environmental focus areas are:

- Carbon Neutrality in Direct Operations (Scope 1 & 2) by 2030
- Net-Zero Across the Value Chain by 2050
- Climate Resilience & Risk Management

Social

Our double materiality assessment reaffirms the importance of fostering an inclusive and engaged workforce, supporting communities, and upholding human rights. We continue to invest in social initiatives that empower the communities where we operate, including digital inclusion efforts, skills development, and employee well-being programs. By cultivating a diverse, equitable, and inclusive workplace, we strive to reflect the societies we serve and strengthen our collective impact.

Our Social focus areas are:

- Digital Inclusion & Equitable Broadband Access
- Workforce Diversity, Equity & Inclusion
- Employee Well-being, Health & Safety
- Community Engagement & Social Responsibility

Governance

Strong governance remains at the core of our ESG approach. We uphold the highest standards of ethical conduct, transparency, and accountability. Our board continues to oversee our evolving ESG strategy, ensuring alignment with regulatory requirements, stakeholder expectations, and corporate values. Through robust risk management and responsible business practices, we maintain trust and resilience in an ever-changing landscape.

Our Governance focus areas are:

- ESG Integration in Corporate Governance
- Risk Management
- Cybersecurity & Data Protection
- Ethical Business Conduct

We continue to review our material topics to stay aligned with evolving expectations and sustainability trends.

Key ESG Achievements in 2024:



327,440 homes passed with broadband infrastructure



114,386
homes connected to
high-speed broadband



23 nationalities represented in our diverse workforce



946,155 kWh of renewable electricity consumed, reinforcing our clean energy commitment

Our ESG road-map is structured across time horizons to manage risk and track progress toward our Carbon Neutrality and Net-Zero goals:

- Short-term (0-2 years)
 Aligns with our financial reporting period.
- Medium-term (3-5 years)
 Supports operational and strategic goals.
- Long-term (More than 5 years)
 Targets ambitious sustainability outcomes.

These time horizons ensure effective management of risks in the short, medium, and long term.

By integrating sustainability into decision-making and setting clear milestones—Carbon Neutrality in direct operations by 2030, supply chain neutrality by 2035, and Net-Zero by 2050—we remain accountable to our commitments. Through structured governance and ongoing stakeholder engagement, we ensure that ESG performance remains central to our business strategy.

Governance and Accountability

Our Audit and Risk Committee (ARC) and senior leadership team oversee ESG strategy and the integration of material impacts, risks, and opportunities (IROs) into our broader risk management framework.

Ongoing engagement with business units ensures that sustainability objectives remain aligned with our evolving materiality assessments. The Board formally approves the disclosure of material IROs, reinforcing transparency and accountability in our reporting..

Following this, we turn our attention to how our governance framework supports the objectives of sustainability reporting under the CSRD by aligning with the ESRS, ensuring transparency and accountability in our ESG disclosures.

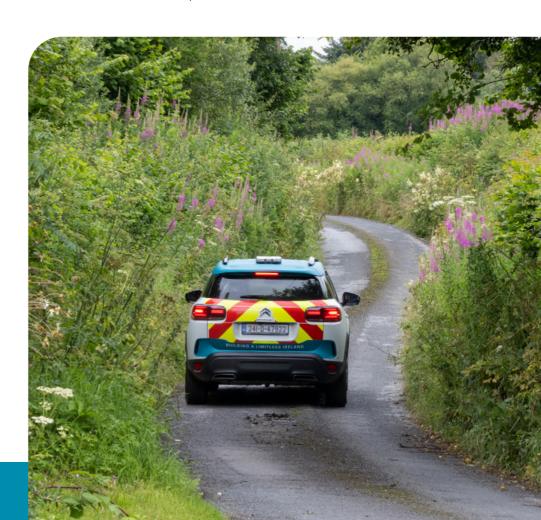
Disclosures in Alignment with the ESRS

NBI disclose performance against ESRS framework, covering environmental impact, social outcomes, and governance practices to ensure accountability, comparability and transparency.

NBI's approach to disclosure includes reporting on key metrics related to:

- Environmental Impact
 Scope 1, 2, and 3 emissions.
- Social Impact
 Workforce welfare and community engagement.
- Governance
 Corporate governance and compliance measures.

By integrating sustainability disclosures into our business model, NBI enhances stakeholder trust and provides a blueprint for responsible business operations in infrastructure development.



Scope of Disclosures

In alignment with the European Sustainability Reporting Standards (ESRS), which provide a structured framework for transparent sustainability reporting, NBI reports on the following key areas:



Climate Change under 'Our Environmental Commitment,' addressing climate-related impacts, risks, and opportunities.



Own Workforce under 'Our Social Commitment – Our People,' covering employee well-being, diversity, and fair working conditions.



Affected Communities under 'Our Social Commitment – Our Impact,' reflecting our engagement with and impact on local communities.



Business Conduct under 'Our Commitment to Responsible Business Conduct,' ensuring ethical governance, compliance, and anticorruption measures.

Building on this commitment, we now turn our focus to NBI's environmental initiatives, outlining the steps we are taking to reduce our environmental impact and contribute to climate action.



Our Environmental Commitment

Carbon Neutrally by

2030 from

Direct Operations, extending across Value Chain by 2035

100%
Renewable energy
for all NBI sites,
including office and Equipment
Accommodation Modules (EAMs)

55 Fleet cars in 2024



ISO 14001 & ISO 50001

Certified - ensuring best-in-class environmental and energy management

ISO 9001 & ISO 45001

Certified - ensuring best-in-class quality, health & safety management

Scope 1: 229 tCO₂e



Scope 2:

OtCO2C

by continuing to procure
100% green electricity

241 tCO₂e avoided in 2024



CLIMATE STRATEGY

To embed climate considerations into our operations, NBI focuses on:

- 1. Emissions Reduction: Monitoring performance across all scopes and improving measurement accuracy.
- 2. Energy Efficiency: Procuring 100% renewable electricity and optimising consumption.
- 3. Value Chain Engagement: Strengthening supplier collaboration to drive Scope 3 reductions.

To ensure NBI's climate strategy is both comprehensive and actionable, we also identify and assess the material impacts, risks, and opportunities (IROs) that will guide our efforts towards achieving these ambitious targets.

MATERIAL CLIMATE-RELATED IMPACTS, RISKS & OPPORTUNITIES

Note: E1 – Climate Change (as defined by the ESRS framework) addresses the material impacts, risks, and opportunities related to climate change. This section highlights the steps NBI is taking to reduce our carbon footprint, enhance climate resilience, and transition to a low-carbon economy.

• Material Impact:

The direct and indirect effects of climate change on our operations and value chain.

Material Risk:

The potential risks to our business posed by climate change, including regulatory, physical, and reputational risks.

• Material Opportunity:

The opportunities we leverage through innovation, energy efficiency, and sustainable practices that drive value while contributing to global climate action.

Building on these priorities, we are committed to mitigating environmental impacts and advancing sustainability across our operations.

Our environmental strategy is grounded in identifying and addressing key climate-related impacts, risks, and opportunities through a double materiality lens:

Our Environmental Commitment						
E1- Climate Change	Material Impact	Material Risk	Material Opportunity			
E1-1: Network Resilience	Actual Positive: Minimising repair costs, performance penalties, and revenue loss due to storm-related disruptions.	Risk of increased repair costs and revenue loss if climate-resilient infrastructure is not built.	Contributing to emission reductions aligned with Ireland's Climate Action Plan. We are actively availing of these opportunities by investing in business continuity and disaster recovery systems, utilising renewable energy sources for operations, and continuously improving energy efficiency.			
E1-2: Network Technology Efficiency	Actual Positive: NBI's network technology is more efficient than legacy systems.	With advanced, energy-efficient technology and strong controls in place, there is no material risk. Our systems enhance service reliability, reduce energy consumption, and support long-term sustainability goals.	Strengthens service reliability, reduces long-term operational risks, aligns with national climate goals, and supports the Net-Zero pathway. We are already leveraging these opportunities through ongoing investments in infrastructure resilience and energy efficiency.			

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ESG POLICY

We are committed to cultivating a sustainable and responsible business culture. Our ESG Policy serves as the cornerstone of our corporate identity, guiding our decisions, actions, and operations at every level. We recognise that protecting the environment is not only a moral obligation but also a strategic imperative. This commitment to sustainability is reflected in our time-bound targets: becoming Carbon Neutral in our own operations by 2030, and across the value chain by 2035; then achieving Net-Zero emissions by 2050.

Our ESG Policy covers key areas such as climate change, human rights, digital inclusion, and corporate governance. We are dedicated to reducing our environmental footprint, promoting diversity and inclusion, and upholding the highest standards of ethics and transparency. Through continuous improvement and proactive engagement with our stakeholders, we aim to create enduring value for both our stakeholders and the planet.

To achieve these goals, NBI has embedded climate considerations into its corporate policies, ensuring accountability and driving continuous improvement.

Together, we are focused on making informed, responsible choices that align with our values and commitments, ensuring a sustainable future for NBI and the communities we serve.

CLIMATE ACTIONS

We are actively implementing initiatives to reduce our environmental footprint, focusing on three key areas:

Emissions Reduction

- Scope 1 (Fleet & Transport):
 Exploring renewable fuel alternatives due to rural infrastructure challenges.
- Scope 2 (Electricity Consumption):
 100% renewable electricity for all sites since 2023.
- Scope 3 (Supply Chain):
 Strengthening supplier expectations on emissions tracking and sustainable procurement.

Energy Efficiency & Operational Sustainability

- Optimised energy use across offices and operational sites.
- ISO 14001 & 50001 certifications reinforce best-in-class environmental management.

Climate Adaptation & Resilience

- Business Continuity and Disaster Recovery (BCDR):
 Ensures resilience strategies are in place to mitigate climate-related risks.
- Major Incident Management Group activated for climate-related disruptions.
- Emergency Power Support: Deploying mobile generators within 8 hours during power outages.
- Tree Trimming Programme: Preventative maintenance along network routes.
- Real-Time Weather Tracking: Enhancing response capabilities to extreme weather events.

These initiatives are integral to both meeting our environmental targets and ensuring business continuity.

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TARGETS & PERFORMANCE

Our Roadmap to 2050

Goal	Target Year	Status
100% Renewable Electricity	Ongoing	Achieved
ISO 9001, 14001/50001 & 45001 Compliance	Ongoing	Achieved
Carbon Neutral Operations	2030	On Track
Supply Chain Neutrality	2035	In Progress
Net-Zero	2050	In Development

Key Climate Metrics

NBI reports the following climate-related metrics:

- GHG Emissions: Scope 1, 2, and 3 data disclosed.
- Energy Consumption: Monitored monthly to track progress.

Note: The 2023 energy consumption was reported as 1,220,796 kWh, whereas 2024 shows a lower figure of 946,155 kWh. This reduction is due to an energy rebate received in 2024, which resulted from a previous overestimation of energy use by our energy supplier. To ensure accurate baseline monitoring for ISO 50001 and transparency in energy performance, we normalised the figures by distributing the rebate-adjusted consumption across previous months, providing a true reflection of monthly and annual usage.











While our key climate metrics provide insight into our progress in emissions reduction and energy efficiency, we also recognise the need to proactively address climate risks to ensure the resilience and continuity of our operations.

Adaptation and Resilience

NBI integrates climate risk mitigation into strategic planning, ensuring infrastructure resilience and business continuity:

- Severe Weather Preparedness: Real-time weather tracking, emergency power deployment, and treetrimming programs.
- Disaster Recovery: Major Incident Management Group and diverse backhaul routes safeguard service reliability.
- Floodplain & Battery Monitoring: Geospatial assessments prevent exposure to flood risks; remote monitoring enhances system readiness.

While NBI prioritises climate adaptation and resilience to ensure service continuity and protect against physical climate risks, we also recognise the importance of reducing our environmental impact. To further strengthen our commitment to a sustainable future, our decarbonisation strategy focuses on driving down emissions across all aspects of our operations and value chain.

*Under the Greenhouse Gas Protocol Corporate Standard, location-based emissions reflect the average emissions intensity of the electricity grid in a given region—in Ireland, this includes a mix of fossil fuels and renewables. In contrast, market-based emissions account for the specific electricity a company purchases; because we procure 100% renewable electricity backed by Guarantees of Origin, our market-based Scope 2 emissions are 0 tCO $_2$ e, while location-based emissions were 267 tCO $_2$ e for 2024.

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DECARBONISATION FRAMEWORK

NBI's 10-pillar decarbonisation focuses on:



1. Energy Transition

Continued procurement of 100% renewable electricity.



2. Efficiency

Implementation of energy-efficient technologies and smart resource management systems.



3. Technological Innovation

Investing in green technologies to reduce emissions and enhance service delivery.



4. Supply Chain

Partnering with suppliers who share our values, with the aim to reduce emissions across our entire value chain.



5. Mobility

Expanding broadband access to rural communities, driving social and economic mobility.



6. Circular Economy

Increasing equipment reuse and recycling in collaboration with subcontractors.



7. Waste Management

Ongoing monitoring and improvement of construction waste management.



8. Flexibility

Adapting our strategy to proactively respond to both regulatory shifts and emerging sustainability trends.



9. Stakeholder Engagement

Involving employees, customers, and communities in climate-related initiatives.



10. Governance

Ensuring clear oversight and accountability for climate-related decision-making.

Guided by the vision of our majority shareholder, Asterion, we understand that sustainability and business success are inherently linked. Achieving Net-Zero by 2050 is not only an environmental responsibility but also a strategic opportunity that drives innovation, resilience, and long-term value creation.

These efforts are supported by robust governance, with oversight from the Audit & Risk Committee (ARC) and our Board with strong leadership from our Senior Management Team (SMT), ensuring clear accountability and continuous progress towards our climate goals.

CLIMATE GOVERNANCE & ACCOUNTABILITY

Environmental oversight is embedded at all levels of the organisation:

- Board Oversight: The Audit & Risk Committee monitors climate risks and strategy.
- Green Team: A dedicated cross-functional group that champions environmental initiatives across the business, ensuring alignment with sustainability goals, fostering employee engagement, and driving solutions to reduce our environmental impact.
- NBI continuously refines its approach, leveraging innovation, collaboration, and governance to drive sustainable progress.

As we work towards a sustainable future through our environmental commitments, we also recognise the importance of fostering a positive social impact, ensuring that our actions benefit not only the planet but also the communities we serve.

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Our Social Commitment















OUR PEOPLE

At NBI, our employees are the foundation of our success. We are dedicated to fostering an inclusive, supportive, and engaging workplace where diversity, well-being, and professional growth are at the forefront. Our social commitments ensure that our operations align with our values and sustainability goals, creating a thriving environment for our people.

- 316 Employees Across 23 Nationalities: reflecting our commitment to a diverse and inclusive workforce.
- **Gender Diversity:** Women represent 30% of the workforce, with 33% in senior leadership roles.
- Board Representation: Women make up 43% of our Board, bringing diverse perspectives and leadership to our highest level of governance. Their expertise and influence help shape our strategic direction, ensuring inclusivity and balanced decision-making at the top.
- Equity & Inclusion: We conduct an annual pay equity analysis, ensuring fairness in compensation and career progression.
- Internal Mobility: 42% of roles were filled through internal promotions and lateral moves, fostering career growth within NBI.

OUR CULTURE

We foster a workplace that prioritises individual development, well-being, and a sense of purpose. Our commitment to sustainability is embedded in our culture, ensuring employees are actively engaged in shaping a better future. Building on our commitment to a fulfilling and rewarding work environment, our workforce strategy prioritises ESG, wellness, diversity and inclusion,

communication, and recognition. These pillars guide our culture and social commitments, helping us enhance operational resilience, retain talent, and build a more inclusive and digitally connected society.

Underpinned by our company values, we are ambitious, collectively taking on Ireland's most transformative infrastructure project since rural electrification. We are motivated to work alongside exceptional people who share our vision, creating an environment where innovation and free-thinking thrive, traditional hierarchies are put aside, and empowerment remains at the heart of everything we do.

Our company values guide us in all aspects of how we operate and epitomise what we stand for. They help us to bring our vision to life, keep us focussed on our mission and ensure we achieve our shared goals.

As we work towards completing the deployment phase of the project and develop a long-term operational model, we are refreshing our corporate values to better align with our evolving strategy. This evolution ensures we continue to stay focused on what drives us while adapting to the changing needs of the business and the communities we serve.

Continuing to foster a culture of inclusivity and empowerment, our focus now turns to the development of our people, ensuring they are equipped with the skills, knowledge, and opportunities to thrive both personally and professionally.











DEVELOPING OUR PEOPLE

Our team continues to grow and diversify, bringing together people from every corner of Ireland and around the world. Now spanning 23 nationalities, we are united by a local mission: to connect friends, families, businesses, and communities across Ireland to high-speed broadband infrastructure, unlocking a world of possibilities for all.

To foster the development of our people, we focus on the following key areas:

- Further Education Sponsorship: Supporting employees in advancing their knowledge and careers.
- Access to Internal Customised eLearning: Offering flexible learning through our internal platform.
- LinkedIn Learning: Over 23K+ courses taught by experts in various formats and is available in 24 languages.
- Training Hours: Employees completed an average of 22 training hours per person, focusing on leadership and high-impact skill-building.
- Internal Vacancies: We are committed to fostering career growth within NBI by offering employees the chance to apply for internal roles, promoting career advancement and the opportunity to take on new challenges within the organisation.

At NBI, we support our employees' career progression by aligning professional growth with personal goals. Our approach encourages self-reflection and performance discussions to help employees identify their strengths, interests, and career aspirations.

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At NBI, careers are nurtured in a development-focused environment, with coaching, mentoring, internal e-learning, LinkedIn Learning, and on-the-job training all readily available and offering opportunities to develop new skills. Regular feedback and career conversations ensure individual goals align with NBI's strategic objectives, resulting in personalised development plans.

Our talent management strategy, *Connecting the Dots*, encompasses key areas such as Learning & Development, Leadership Development, Performance Management, and Effectiveness.









Leadership Development



Performance Management



Team Effectiveness

Emerging Leaders Programme

A key component of our leadership development strategy was the Leadership Development Programme, designed and rolled out in 2023. This six-month blended learning programme is available to all people managers at NBI, including those in both NBI Infrastructure and NBI Deployment. The programme integrates classroom training, virtual sessions, real-world applications, and cross-

functional collaboration to strengthen leadership across the organisation.

- Pre-Work Activities: Psychometric assessments, questionnaires, peer-to-peer coaching, and interviews to personalise development plans and identify leadership strengths.
- Programme Structure: A mix of classroom sessions, virtual training, and expert-led workshops, with opportunities for managers to engage in challenging projects and cross-team collaboration.
- Post-Work Activities: Reading articles, completing LinkedIn Learning videos and podcasts, and applying learning through mentorship and curated leadership resources.

In 2024, we followed up the Leadership Development Programme with the Emerging Leaders Programme, designed to build on the momentum of the previous year and support the next generation of leaders within NBI. This programme is tailored to further develop high-potential managers and prepare them for increased leadership responsibilities.

As we continue to grow and evolve, we remain committed to empowering our employees through development opportunities, ensuring their careers align with both their personal goals and NBI's long-term success. Designed to cultivate future leaders, the programme has already contributed to an increase in internal promotions within leadership roles.

As part of our commitment to holistic employee development, we have also integrated ESG training to ensure that sustainability is a key focus in both leadership and everyday operations.



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ESG Training

We believe that sustainability is not just a top-down initiative but one that requires active participation across all levels of our organisation. To this end, we have launched ESG training for employees and leadership, building sustainability literacy across teams.

Through these initiatives, NBI aims to drive positive, lasting impact for our employees, communities, and stakeholders while shaping a sustainable future for Ireland.

Encouraging a Nature-Positive Lifestyle

As part of our environmental sustainability efforts, we encourage employees to adopt a nature-positive lifestyle. In 2024, we hosted an ESG Lunch & Learn for Biodiversity Day, featuring:

- The All-Ireland Pollinator Plan: A Blueprint for Action
- Business Guidelines for Supporting Biodiversity

This session equipped employees with the knowledge and tools to contribute to biodiversity conservation — both at work and in their daily lives.

Decarbonisation Day

To reinforce our commitment to Carbon Neutrality and Net-Zero emissions, we celebrated Decarbonisation Day with an ESG Lunch & Learn, where we:

- Shared NBI's ESG Strategy & Roadmap, outlining our sustainability commitments.
- Discussed practical actions employees can take to reduce their carbon footprints.

By integrating sustainability into workplace culture, we empower employees to be active participants in climate action.

Through these efforts, we create an environment where employees feel supported, valued, and empowered to grow. By aligning professional development with ESG goals, we ensure that NBI remains a place of opportunity, innovation, and long-term career success, while empowering our people to actively contribute to a more sustainable future.

Engagement through our Connected Programme

Building on our commitment to employee development and sustainability, our Connected Programme continues to evolve, continuing to cultivate a workplace where employees feel valued and inspired. In 2024, we are deepening our focus on:

- Creating purpose-driven engagement that enhances pride in our work and its impact on communities.
- Strengthening our workplace culture through initiatives that celebrate diversity, inclusion, and shared success.

- Enhancing wellness and professional growth to support employees in achieving both personal and career aspirations.
- Fostering a dynamic and supportive environment where colleagues feel valued, heard, and connected.

As mentioned earlier in this section, it is essential that future engagements are purposeful and intentional. With this focus, we prioritise the following key pillars:

- 1. Diversity & Inclusion
- 2. Wellness & Social
- 3. Colleague Recognition
- 4. Internal Communication



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1. Workforce Diversity & Inclusion

We are committed to fostering a workplace where all employees have equal opportunities to thrive and contribute. Our Diversity, Equity, and Inclusion (DEI) strategy prioritises targeted initiatives for underrepresented groups, including inclusive hiring practices and cultural competency training. Through the Connected Programme, we promote awareness, resource groups, and a culture of trust, respect, and belonging.



Strengthening DEI

In 2024, we deepened our commitment with expanded initiatives:

- Workplace Policies & Training: Reinforcing our Equal Opportunity and Diversity Policy with Dignity at Work training to ensure a respectful and inclusive workplace.
- Inclusive Hiring & Support: Expanding our Eligibility to Work Sponsorship Programme, attracting skilled professionals from diverse backgrounds.

Gender Pay Gap & Representation

NBI is dedicated to closing the gender pay gap and enhancing workplace diversity. In 2024, our core gender pay gap stands at 11.83%, down from 14.83% in 2022—progress driven by key initiatives:

- Recruitment & Promotion: 42% of new hires in the past two years have been women, increasing female workforce participation to 31%. Recruitment and promotion criteria have been standardised to ensure fairness and transparency.
- Training & Awareness: Unconscious bias and Dignity at Work training help mitigate bias in decision-making.
- Employee Engagement: The Connected programme hosted a Returning from Family Leave Masterclass, supporting employees' transitions back to work.
- Career Progression & Development: Leadership development programmes, LinkedIn Learning, and a Further Education Sponsorship Programme ensure equitable growth opportunities. Female participation is prioritised in leadership training.
- Policy Development: Salary decisions and performance-related pay follow Board-approved, bias-free criteria. Family-friendly policies and hybrid work environments support employee well-being.

 Industry Participation: Our partnership with the Women's Infrastructure Network (WIN) promotes gender diversity across the sector. Further details on this initiative will be discussed later in this report under, 'Our Impact.' NBI are also members of the The 30% Club.

Diversity in Leadership

- Senior Representation: 33% of our Senior Management Team are women, reflecting our commitment to balanced leadership and alignment with SDG 5: Gender Equality.
- Leadership Pipeline: Minimum targets for female participation in our Leadership Development and Emerging Leaders programmes ensure a strong future pipeline.

Inclusivity Initiatives

- Diversity & Inclusion Training: Ongoing learning fosters a culture where every employee feels valued and empowered (SDG 5 & SDG 10).
- Gender Bias Training: Ensures fairness in performance reviews, promotions, and pay decisions.
- International Women's Day 2024: Featured guest speakers Sarah Shiller (Business Psychologist) and Siobhán Mungovan (Spina Bifida Mind Coach), sparking discussions on workplace inclusivity.
- Visa Sponsorship Support: Assisting employees in securing work visas, reinforcing our commitment to a diverse, global workforce.
- Partnerships with WIN: Advancing gender diversity and professional development in infrastructure (see 'Our Impact' section for details).

The Impact of Diversity on Success

A diverse workforce fuels innovation, enhances problem-solving, and strengthens decision-making. By fostering inclusion, we empower employees and drive success across NBI's key projects—particularly the nationwide high-speed broadband rollout. This aligns with SDG 9: Industry, Innovation & Infrastructure, ensuring digital access for all communities.

At NBI, diversity isn't just a commitment—it's a driving force behind our progress, innovation, and impact. In 2024, we continue expanding representation, fostering allyship, and creating an inclusive workplace. Through

education, collaboration, and action, we cultivate a culture where everyone is valued, heard, and empowered to succeed.

2. Employee Wellness & Social Sustainability

At NBI, we recognise that employee health, well-being, and engagement are integral to personal success and the achievement of our sustainability goals. In 2024, we expanded our wellness initiatives to foster a healthy, engaged, and thriving workforce while aligning with our broader FSG commitments.



Health and Wellness Initiatives

As part of our commitment to holistic well-being, we introduced the Lifestyle Checkpoint Machine — a comprehensive health tool empowering employees to monitor their physical health and make informed wellness decisions. Key health metrics include:

- Height, Weight, and BMI.
- Total Body Fat & Visceral Fat.
- Blood Pressure & Body Temperature.
- Muscle & Bone Mass.
- Hydration & Metabolic Levels.
- Blood Oxygen Saturation.
- Mood Balance & Hydration Status.

By offering this service, we foster proactive health management, enhancing employee overall well-being.

Mental Health Awareness & Support

Mental health remains a top priority at NBI. In 2024, we strengthened our commitment by:

- Ensuring continued access to professional mental health services, providing employees with the support they need.
- Raising awareness of neurodiversity, fostering a workplace that values diverse mental health needs.
- Commemorating World Mental Health Day, featuring a session led by Dermot Whelan to encourage open discussions on mental well-being in the workplace.

Financial Wellbeing

Recognising the connection between financial stability and overall well-being, we partnered with PTSB to support employees in navigating financial planning. In 2024, we provided:

- On-site banking services, offering guidance on mortgages, investments, day-to-day banking, and lending.
- Financial education sessions, reducing financial stress and supporting long-term stability.

Understanding the importance of balancing various elements of well-being, we continued to foster a culture of health, mental wellness, and financial empowerment.

Building on our commitment to holistic well-being, we also recognise that physical activity positively impacts both mental and physical health.

Power of Play

We believe in the power of movement and play to enhance both physical and mental well-being. In 2024, we continued to encourage team-based physical activities supporting initiatives like workplace running, golf and cycling clubs, and recreational sports events. These activities not only promote physical health but also foster team cohesion and a strong sense of community within NBI.

As we continue to evolve our Wellness & Social initiatives, our goal is to create an inclusive, supportive, fun and engaging workplace where employees can thrive — both personally and professionally. By prioritising wellbeing, recognition, and meaningful connections, we are building a workplace that people genuinely love being a part of.

3. Colleague Recognition

Recognising and celebrating the contributions of our employees is a cornerstone of our culture. In 2024, we continued to celebrate excellence through:

- Recognition at All Hands meetings and companywide events, where employees' achievements are highlighted and celebrated. Engagement in the recognition programme has grown significantly, with 260 nominations made this year a 61% increase from 162 nominations in 2023.
- Social events and team-building activities that promote a sense of community and strengthen interpersonal connections across the organisation.

4. Internal Communication: Keeping Everyone Connected

Transparency and open communication are critical to building trust and alignment within our workforce. In 2024, we enhanced our internal communications by:

- Launching a new internal comms platform, Viva Engage, for real-time information sharing.
- Expanding our company intranet with new interactive features, making it easier for employees to access resources, company updates, and discussion forums.
- Hosting more frequent All Hands meetings, fostering a culture of openness and alignment across departments.
- Improving our bi-weekly e-zine to feature more employee stories, department highlights, and business insights, keeping everyone informed and engaged.

These improvements ensure that all employees feel connected, informed, and involved in NBI's mission and achievements.



Actioning Feedback - Our Colleague Engagement

Through annual surveys, focus groups, and one-on-one feedback sessions, we gather valuable insights that inform our policies, actions, and targets, ensuring alignment with employee needs and expectations.

We place great value on our colleagues' feedback and recognise the importance of listening to every voice. Our annual Colleague Engagement Survey provides an essential platform for team members to share their thoughts, allowing us to understand their needs and take appropriate action. In 2024, we implemented improvements based on colleague feedback, such as flexible working arrangements and expanded mental health resources—changes that have been instrumental in improving workplace satisfaction.

By incorporating these insights, we not only ensure an employee-centric approach but also align our efforts with NBI's operational strategy, driving performance across the organisation. Looking ahead to 2025, we remain committed to engaging with our colleagues, using their feedback to shape a dynamic, inclusive, and supportive workplace culture.

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Company Awards & Recognitions

Building on these ongoing efforts to engage our workforce, we are proud to see our commitment to operational excellence and employee well-being recognised both internally and externally. In 2024, NBI received significant recognition for its dedication to delivering meaningful outcomes for stakeholders and employees alike, further reinforcing our mission to foster a supportive and thriving workplace environment.

Company of the Year – Chambers Ireland / InBUSINESS Recognition Awards 2024

NBI was honoured as Company of the Year at the Chambers Ireland / InBUSINESS Recognition Awards 2024. This prestigious award celebrates excellence in Irish business, recognising innovation, technological achievement, and employee engagement. NBI was commended for its groundbreaking work on the National Broadband Plan, fostering a positive workplace culture, and actively bridging the digital divide between urban and rural communities.

Being named 'Company of the Year' is a testament to the dedication of our entire team, our 1,800 contractors, and valued stakeholders. Their hard work ensures the National Broadband Plan remains on schedule and on budget—bringing high-speed fibre broadband to over 1.1 million citizens, 65,000 farms, 44,000 businesses, and nearly 700 schools across Ireland."

Peter Hendrick, NBI's CEO

Champion Employee Wellbeing Strategy – Irish HR Champion Awards 2024

NBI also received the Champion Employee Wellbeing Strategy award at the Irish HR Champion Awards 2024, recognising its holistic approach to employee well-being. Embedded in its culture, NBI's well-being initiatives—such as the Ibec KeepWell Mark and the 'Connected' colleague engagement programme—reflect the company's commitment to fostering a healthy, inclusive, and supportive workplace.

Further validating this commitment, NBI was named one of Ireland's Top 100 Leading Companies in Wellbeing by IBEC Business & Finance in 2024, celebrating organisations that are setting the standard in workplace wellness across the country.

Building on this commitment to well-being, safeguarding the physical health and safety of our employees remains a top priority. In 2024, NBI continued to reinforce its health and safety initiatives, ensuring a secure and supportive work environment for all.

Our people are our greatest asset. This award highlights the collective effort of our team in prioritising employee well-being and delivering meaningful initiatives that support both professional and personal growth."

Daragh O'Mahony,

NBI's Chief People & Sustainability Officer



HEALTH & SAFETY

Health & Safety remains a cornerstone of NBI's sustainability framework. We are deeply committed to engaging employees in safety training and reporting, ensuring transparency at all levels. Our proactive approach to risk management and continuous improvement fosters a culture where everyone is responsible for maintaining a safe and healthy work environment.



In 2024, our safety training and risk management strategies reinforced accountability and our commitment to continuous improvement. Key initiatives include:

- Leadership Oversight: Health & Safety remains the first agenda item at all Senior Management Team (SMT) meetings, ensuring continuous leadership support. All incidents are reported and openly discussed to promote transparency and shared responsibility.
- Leadership Commitment: NBI's Health, Safety, Quality, Environmental & Energy (HSQEEn) Policy was reviewed and endorsed by both the NBID and NBII CEO's demonstrating their commitment to the execution and continuous improvement of our Integrated Management System (IMS).
- Proactive Risk Management: We employ predictive analytics to identify high-risk areas, allowing us to implement preventive measures before incidents occur.
- Audit & Inspection Programme: Targeted and robust NBI audit and inspection programme drives compliance in onsite health and safety controls.
- Reactive Incident Response: Strengthened protocols ensure thorough investigations, immediate corrective actions, and improved preventive measures.
- Contractor Safety Performance Monitoring: Contractor safety performance is a key component of our evaluation and tender processes, promoting consistent safety standards throughout our supply chain. In-life monitoring of our contractor's safety performance is carried out with results, challenges and improvements required identified.
- Consequence Management: In cases where repeated poor performance against safety KPI's is identified, NBI initiate improvement plans where key risks are identified, remedial actions are recorded and tracked to closure.

Incident & Accident Management

We remain committed to the belief that every injury is preventable. In 2024, we continued our efforts to reduce Lost Time Incidents (LTIs) and cultivate a safety-first culture.

Key achievements include:

- Continued positive performance against our Lost Time Incident Rate (LTIR) KPI:
- 2024 Target LTIFR < 0.34 | Result: 0.26
- Following an already 10% annual reduction in the target LTIR from the commencement of the project, it was decided that a period of stability would facilitate NBI in evaluating the LTI baseline and analysing the suitability and efficacy of the KPI as the business grows.
- Leveraging data-driven insights to predict and mitigate potential risks.
- Robust incident processes ensures that lessons are learned and applied promptly.
- Root cause analysis of incidents to identify trends.
- Communication of incidents, remedial actions and learnings across the business and contractors to foster a culture of transparency and to share learnings to prevent future incidents.

Our goal is to provide a safe working environment for every employee and contractor. By prioritising proactive risk management, continuous learning, and accountability, we are working toward an injury-free workplace.

ISO Certifications

NBI's commitment to health and safety is reflected in the maintenance and continuous improvement of our ISO certifications:



• ISO 45001 (Occupational Health and Safety Management System):
We continue to hold our ISO 45001 certification. This standard underscores our commitment to managing risks, promoting a safe work environment, and protecting the well-being of our employees.



 ISO 9001 (Quality Management System): Quality management and safety often go hand in hand. Our ISO 9001 certification emphasises our commitment to maintaining high-quality standards, which naturally extend to safety practices.



 ISO 14001 (Environmental Management System): Environmental health and safety are interconnected.
 Our ISO 14001 certification reflects our commitment to minimising the environmental impact of our operations, thereby contributing to overall health and safety.



I.S. EN ISO 50001:2018

NSAI Certified

• ISO 50001 (Energy Management System): We are dedicated to energy efficiency and have maintained our ISO 50001 certification. This standard is essential in our efforts to reduce energy consumption, which has a positive impact on both the environment and the well-being of our workforce.



System): The health and safety of our employees extends to the services we provide. ISO 20001 helps us manage these services efficiently and aligns them with our health and safety objectives.



• ISO 27001 (Information Security Management System) and ISO 27701 (Privacy Information Management System): The management of systems, information (personal and commercial) and associated risk management is crucial in protecting our employees, customers and stakeholders. Our ISO 27001 and 27701 certification signifies our commitment to securing sensitive data and ensuring that all information is managed with the utmost care.



In 2024, NBI successfully achieved our ISO 9001, ISO 14001 and ISO 45001 recertification for Cycle 2 along with completing our final surveillance audit of ISO 50001 Cycle 1. There were 0 non-conformances identified by the external auditor demonstrating the suitability and efficacy of NBI's IMS.

Industry Collaboration & Leadership

Recognising the importance of industry-wide collaboration, NBI played a pivotal role in launching the EHS Telecoms Industry Forum in 2023. This initiative, which brings together contractors and major infrastructure owners, promotes knowledge-sharing and the establishment of common H&S standards across the telecoms sector. In 2024, we deepened this collaboration, working with industry peers to refine best practices and enhance safety benchmarks on key topics that pose a high risk across all companies. Noticeable improvements in compliance on site in these areas has been delivered since the rollout of key initiatives such as Telecoms specific Temporary Traffic Management Awareness Training course and supporting manual.

Recognising Safety Excellence

NBI is committed to celebrating those who embody our safety values. In 2024, NBI introduced the Safety Person of the Year Award as part of the annual HSQE Week, which allowed peers and/or line managers to nominate individuals across the business.

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The award has been introduced to give recognition to employees that have been proactive in improving our safety management system and fostering the safety culture within NBI."

NBI's Director of HSQE and Contract Management



HSQE Week

HSQE Week also highlighted NBI's dedication to community engagement, including initiatives like site visits, beach cleanups, tidy towns, health monitoring, and more. Employee hours contributed to social and community engagement activities further underscore our commitment to making a positive impact in the workplace and beyond.

In 2024, NBI provided office-based employees with the opportunity to visit live work sites and gain firsthand insight into HSQE site requirements. In collaboration with our contractors, NBI partnered with Tidy Towns and An Taisce's Clean Coasts to conduct multiple beach clean-ups along the coastline, as well as litter-picking initiatives in towns.

The theme for 2024 HSQE Week was "Back to Basics – Let's Start With You". The focus was on safety, health and wellbeing and coincided with World Mental Health Day.

The key stone event for the week was the provision of health checks that included a comprehensive blood screening.

NBI partnered with an organisation called MyBloods who carried out the checks on site in our head office in Citywest.

There were 66 health checks completed during HSQE Week.

Due to overwhelming requests for appointments,
a supplementary round of checks was offered in December with an additional 48 employees availing of the services.

While safeguarding the health and safety of our workforce is fundamental, our social responsibility is reflected through initiatives focused on employee well-being, diversity, and community connectivity. NBI is committed to fostering a more inclusive, equitable, and socially responsible organisation.

MATERIAL WORKFORCE-RELATED IMPACTS, RISKS & OPPORTUNITIES

This section outlines the key workforce-related impacts, risks, and opportunities shaping NBI's organisational health strategy.

Note: S1 – Own Workforce (as defined by the ESRS framework) addresses the material impacts, risks, and opportunities related to NBI's employees. This section highlights our commitment to fostering a safe, inclusive, and thriving workplace that supports employee well-being, professional growth, and equitable opportunities.

- Material Impact: The direct and indirect effects of workplace policies, conditions, and culture on employee well-being, development, and retention.
- Material Risk: Potential risks such as workplace injuries, mental health challenges, talent attrition, and reputational harm if ethical labour and DEI standards are not upheld.
- Material Opportunity: Strengthening our employer brand, enhancing workplace safety and well-being, fostering an inclusive culture, and investing in learning and leadership development to future-proof our workforce.

Managing these priorities is fundamental to NBI's organisational health strategy. By embedding responsible business practices and prioritising employee well-being, diversity, and skills development, we are committed to building a resilient and engaged workforce.

The identification and management of these material IROs are integral to NBI's commitment to responsible business practices and the well-being of our employees, communities, and stakeholders. With a clear understanding of these key areas, NBI focuses on the policies, actions, and targets that align with these priorities to further foster a supportive and inclusive work environment. Further details are provided in the following sections.

Our People					
S1 – Own Workforce	Material Impact	Material Risk	Material Opportunity		
S1-1: Employee Well-being & Safety	Actual Positive: NBI is committed to a zero-harm workplace, aligning with ISO 45001 standards to ensure a safe and healthy environment.	Risk of workplace injuries and mental health challenges impacting productivity. • Upholding high ethical labour standards across our business to mitigate risks related to workforce conditions.	 Enhancing workplace safety culture through training, leadership commitment, and well-being initiatives. Investing in continuous learning and leadership development to future-proof our workforce. Addressing skill shortages and enhancing talent development to ensure business continuity and innovation. 		
S1-2: Diversity, Equity & Inclusion (DEI)	Actual Positive: Promoting equal opportunities, supporting pay equity, and fostering a culture of belonging.	Risk of talent attrition and reputational damage if DEI principles are not upheld.	Strengthening our employer brand and innovation potential by embedding DEI in recruitment, development, and leadership.		
S1-3: Community Connectivity	Actual Positive: Expanding broadband access to underserved communities, driving digital inclusion, and stimulating economic growth.	Risk of digital exclusion leading to socio- economic disparities.	Leveraging digital connectivity to empower rural and underserved communities, enabling education, remote work, and economic resilience.		

INTERNAL WORKFORCE POLICIES & COMMITMENTS

At NBI, we prioritise creating a supportive and inclusive workplace that empowers our employees to thrive. Our Employee Handbook outlines the values, expectations, and benefits that guide our work culture, ensuring clarity on workplace conduct, employee rights, and organisational policies. It serves as a comprehensive resource to support employees in understanding NBI's commitments to their well-being, professional development, and work-life balance. We believe that a transparent and accessible handbook fosters an environment where everyone feels valued and equipped to succeed.

To this end, NBI is committed to fostering a diverse and inclusive workplace where every individual is respected and empowered to contribute to their fullest potential. Our Diversity & Inclusion Policy reflects our dedication to promoting equality, eliminating bias, and ensuring fair treatment for all employees, regardless of their race, gender, sexual orientation, age, or background. We strive to build a workforce that is representative of the communities we serve, recognising that diverse perspectives drive innovation, creativity, and long-term success. Through this policy, NBI actively works to ensure an inclusive culture that values uniqueness, celebrates differences, and encourages collaboration at all levels of the organisation.

As we continue to make progress in these areas, our efforts will be further supported by specific, measurable goals that align with our strategic priorities.

Key Social Goals for 2024

- Expand Equitable Broadband Access: Pass 564,000+ rural homes, farms, schools, and businesses.
- Workforce Diversity & Inclusion: Advancing gender balance and representation in leadership roles.
- Employee Well-being & Engagement: Supporting work-life balance and ensuring a safe, healthy workplace.
- ISO 45001 & ISO 14001 Compliance: Maintaining world-class health, safety, and environmental standards.

These goals form the foundation of our actions and initiatives aimed at building a sustainable and inclusive organisation.

Workforce Actions

Key Initiatives:

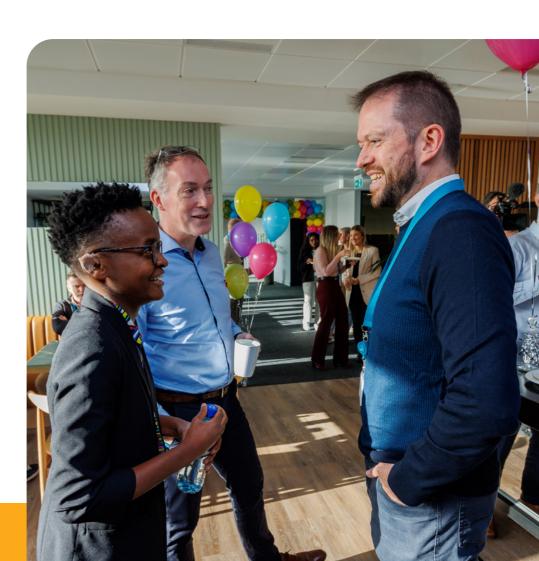
- Skills & Workforce Development: Providing training and career growth opportunities.
- **Diversity & Equity Programmes:** Championing inclusive hiring and workplace practices.
- Community Engagement & Partnerships: Supporting local businesses, education, and sustainability initiatives.

Expanding Our Impact in 2025

We are continuing to focus on key pillars:

- **Diversity & Inclusion:** Building an inclusive culture where every employee feels a sense of belonging.
- Wellness & Social: Supporting mental, physical, and emotional well-being while fostering community bonds.
- Colleague Recognition: Celebrating achievements and contributions across the organisation.
- Internal Communications: Strengthening collaboration through clear, open dialogue.

By prioritising our people, we ensure that NBI remains a great place to work, grow, and make a lasting impact. As we strive to meet these objectives, we are committed to tracking our progress with measurable targets to hold ourselves accountable and ensure continuous improvement.





TARGETS & PERFORMANCE

NBI is committed to measurable progress in workforce development, diversity & inclusion, wellbeing, and health & safety. Key targets include:

- Diversity & Inclusion Representation: Committing to gender balance and diversity by ensuring at least 30% women in leadership positions.
- Staff Engagement & Satisfaction: Achieving high employee satisfaction and engagement scores through regular feedback mechanisms.
- ISO Compliance: Continuing to meet and exceed ISO 45001 and ISO 14001 standards to maintain world-class health, safety, and environmental standards.
- Lost Time Incident (LTI) Rate: Maintain a rate below the company KPI (2024 LTI rate: 0.26), ensuring a safe and healthy work environment for all employees.

These measurable targets are directly aligned with our commitment to improving employee well-being and fostering diversity and inclusion, ensuring our workforce is equipped and empowered to contribute to NBI's ESG goals.

We monitor progress on the above targets with updates reported to the Board on a quarterly basis to ensure accountability and continuous improvement.

NBI's commitment to fostering an inclusive, safe, and engaging workplace is essential to delivering on its broader ESG objectives. By prioritising employee well-being, diversity, and professional development, NBI strengthens operational resilience, enhances workforce satisfaction, and contributes to long-term sustainability.

Our commitment to developing a supportive, inclusive, and well-equipped workforce extends into the broader impact we have on the communities we serve. The next section, Our Impact, highlights how we are contributing to local development through our operations and stakeholder engagement.

MATERIAL COMMUNITY-RELATED IMPACTS, RISKS & OPPRTUNITIES

Supporting Affected Communities

NBI is committed to bridging the digital divide by supporting rural and underserved communities through the delivery of high-speed broadband, education, and inclusive community initiatives. Our approach involves proactively identifying affected communities, engaging stakeholders to understand their needs, assessing potential impacts, implementing mitigation measures, and tracking outcomes to ensure continuous improvement.

In 2024, we made significant progress delivering broadband within the National Broadband Plan (NBP) Intervention Area —ensuring that no community is left behind while driving social equity, sustainability, and long-term opportunity.

Our Corporate Social Responsibility

NBI recognises the critical role that broadband connectivity plays in empowering communities and supporting long-term social development. Our work aims to address digital inequality and foster inclusive, community-led progress through meaningful engagement and strategic investment.

We identify affected communities through demographic analysis, geographic mapping, and stakeholder consultations. By listening to those directly impacted, we can shape solutions that reflect their lived realities and ensure lasting benefits.

Note: S3 – Affected Communities (as defined by the ESRS framework) focuses on the material impacts, risks, and opportunities related to communities affected by NBI's operations. This section highlights our commitment to advancing digital inclusion and equitable access to opportunity.

Identification of Affected Communities

In the State's Intervention Area, NBI identifies affected communities through demographic analysis, geographic mapping of underserved areas, and stakeholder consultations. Key affected groups include:

- Rural residents.
- Farmers.
- Students.
- Small business owners.
- Community organisations with limited digital connectivity.

Engagement with Affected Communities

Effective engagement is critical to ensuring that our broadband rollout meets the real needs of those we serve. By prioritising meaningful stakeholder engagement, NBI ensures that affected communities' voices shape our planning and operations.

Affected Communities						
S3 - Affected Communities	Material Impact	Material Risk	Material Opportunity			
S3-1: Communities' Economic, Social and Cultural Rights Broadband access & community connectivity.	Actual Positive: Expanding broadband access to underserved communities, driving digital inclusion, and stimulating economic growth.	Risk of digital exclusion leading to socio-economic disparities.	Leveraging digital connectivity to empower rural and underserved communities, enabling education, remote work, and economic resilience.			



Key Engagement Initiatives:

- Community Consultations: Regular forums and feedback sessions with local residents, farmers, and authorities.
- Collaborations: Partnerships with organisations such as DCU Access to the Workplace and Teen Turn to co-create career development opportunities.
- Grassroots Initiatives: Engagement with local schools, sports clubs, and community centres to foster trust and collaboration.

Through these partnerships, we've not only created digital solutions but also empowered communities to take ownership of their future. This engagement is supported by robust policies that govern our approach to stakeholder collaboration and transparency.



Policies

Stakeholder Disclosure Boundary Policy

NBI is committed to ethical, accountable, and transparent stakeholder engagement. Our Stakeholder Disclosure Boundaries Policy ensures that relevant information is shared appropriately while safeguarding commercially sensitive and confidential data. By defining clear boundaries for communication with various stakeholder groups—including end users, Broadband Service Providers, government entities, and civic organisations—we promote transparency and trust. This policy supports our strategic priorities and enhances our ability to deliver on our commitments, ensuring that all interactions are conducted with integrity and respect for confidentiality.

Social and Community Dialogue Policy

NBI fosters open, ongoing dialogue with the communities we serve, ensuring that their voices shape our initiatives. This policy underpins our commitment to two-way communication, active listening, and meaningful collaboration, reinforcing trust and shared progress. We are dedicated to fostering strong, transparent, and mutually beneficial relationships with our stakeholders, including social and community groups. By engaging with various stakeholder groups—residential, business, agricultural end-users, and civic organisations—we aim to enhance community well-being, build trust, and support the successful delivery of our objectives.

These policies guide our efforts, ensuring that community engagement translates into meaningful action and has lasting benefits.

Actions

NBI's initiatives contribute directly to improving quality of life and economic resilience in affected communities.

- Bridging the Digital Divide: 12,000+ farms connected in 2024 (32,000 to date), enabling digital access for rural families, students, and businesses.
- NBP Rollout Milestone: Hosted the EU Broadband Competence Offices (BCO) Network as the NBP rollout surpassed 250,000 connections, reinforcing Ireland's leadership in rural connectivity.
- Community Empowerment: Increased access to education, remote work, and telemedicine through high-speed broadband.
- Economic Development: Rural businesses and farms benefit from enhanced productivity and market reach.
- Social Inclusion: Digital connectivity ensures equitable opportunities for disadvantaged and remote populations.

These actions align with our broader mission to create inclusive digital access and long-term sustainability.

Targets and Performance

To measure our impact, NBI sets clear performance targets to bridge the digital divide and foster community development, ensuring connectivity reaches even the most remote areas.

- Bringing Connectivity to the Black Valley, Co. Kerry –
 One of Ireland's most isolated areas is now better
 connected, enhancing its attractiveness for families,
 businesses, and tourism, unlocking new opportunities
 for economic growth.
- Empowering Island Communities Island connectivity remains a key priority, with 27 deployment areas identified—10 of which are now live. These efforts are transforming island life, enabling remote work, education, and business innovation. (Check our website for the latest island stories.)
- Strengthening Rural Resilience In the past year alone, we have connected 12,000 additional farms, bringing the total to 32,000 to date. Our medium-term goal is to reach 65,000 farms, ensuring rural communities thrive through improved digital access, supporting precision farming, agri-business growth, and sustainable rural development.

The GAA plays such an important part in connecting local communities across Ireland, and at National Broadband Ireland we have the same goal."

TJ Malone ——
NBI Deployment's CEO

COMMUNITY INVESTMENT & SUPPORT

NBI is committed to fostering rural jobs, entrepreneurship, and community well-being through funding and local engagement initiatives, via our partnership with The RISE Community Fund.

Community Success Stories:

- Clonmany First Responders.
- Fashion Connect Ireland Ltd.
- Irish Street Arts, Circus & Spectacle Network CLG (ISACS).
- Clonard Guiding Unit.
- Enniscorthy Community Alliance.
- Ramsgrange Community School.
- Shuttle Knit CLG.
- Wicklow Men's Shed.
- Sylvester Bourke Farming.
- The Multiple Sclerosis Society of Ireland.

- Kilmacanogue NS.
- Ballyea Community Group (BCG).
- East Clare Community Co-Operative Society Ltd.
- Corofin Future Planning Association.
- Kilnaboy Group Water Scheme Cooperative Society Ltd.
- St Joseph's NS Cree.
- AppleOak FibreWorks.

To ensure our initiatives drive lasting impact, we continuously track and evaluate outcomes, using data-driven insights to refine our approach and maximise the benefits for affected communities.



Tracking and Monitoring Outcomes

NBI measures the effectiveness of its engagement and support initiatives through:

- Community Feedback Surveys: Assessing satisfaction and identifying areas for improvement.
- Connection Metrics: Tracking broadband uptake in underserved areas.
- Impact Assessments: Evaluating socio-economic outcomes such as job creation, educational improvements, and digital inclusion.
- Annual Reviews: Transparent reporting on progress, challenges, and future plans.

Tracking these metrics allows us to assess our long-term progress toward achieving a more inclusive and digitally empowered society.

Mitigation Measures and Support

To minimise negative impacts and enhance positive outcomes, NBI implements tailored support measures that align with the needs of affected communities. This includes:

- Minimising Disruption: Transparent communication on construction schedules and support for affected residents during the network build-out.
- Health & Safety Initiatives: Donations of essential equipment, such as defibrillators for local first responders.

Beyond this support, NBI's Connected Programme also invests in broader community initiatives that drive education, career development, and inclusivity within the digital economy.

Connected Programme Community Initiatives:

Empowering Through Education & Career Development

A key pillar of our community initiatives is empowering young people through education and career development opportunities.

Youth & Education Initiatives:

- Teen Turn Internship:
 - Hosted two students for hands-on experience across all units of the organisation, supporting the promotion of women in technology.
- DCU Access to the Workplace:
 - Offers internships and mentorships to students from disadvantaged or neurodivergent backgrounds.
 - Provides CV writing, interview skills, and workplace readiness training.

In addition to supporting youth, we are committed to fostering gender diversity in infrastructure and leadership.

Women's Infrastructure Network (WIN) Ireland: 2024 Highlights:

• Supporting The 30% Club Ireland to increase the representation of women in senior leadership roles.

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Involvement in The 30% Club gives NBI an opportunity to be part of the change. It ensures we are part of the accelerated action to see women's roles in senior leadership continue to grow."

NBI's Director of HSQE and Contract Management

- Conducted workshops on career-parenthood balance and inclusive career development.
- Participated in the WIN Climate Justice conversation with Mary Robinson.

Our commitment to WIN also comes in the form of NBI colleagues who actively partake in event development and fulfilment, ensuring that events are professional and support the objectives of WIN.

In addition, our community impact extends to sponsorships and partnerships that provide meaningful support to local organisations and initiatives.

2024 Community Sponsorship:

NBI actively engages with local communities through sponsorships and donations.

€6,000+ Community Sponsorships (up to €500 each) for:

- Schools & Sports Clubs: Duncan National School, Shelbourne U10 Boys,, Riverdale U13 Girls, Moone Celtic FC, Highview Athletic FC.
- GAA Clubs: St. John UA, St. Brendan's, Thomas Davis U13 Camogie.

Health & Safety Support (via RISE):

 Donated a defibrillator to Clonmany Community First Responders with the RISE Foundation.

Youth & Sports Engagement:

- National Macra Club of the Year 2024, proudly sponsored by NBI - Freemount Macra.
- Regional Macra Club of the Year 2024 Callan Macra (Leinster) and Three Parishes Macra (Northwest).
- Supporting Innovation in Agriculture Sponsorship of Macra Farm Tech & Business Award, empowering young farmers with cutting-edge technology and skills.
- Strengthening Local Sports Proud sponsors of Kildare GAA, fostering community spirit and youth development through sport.

Charity Partnerships:

• Supported Barnardos Lorien Project and Christmas Charity Initiatives.

To conclude our impact efforts, NBI remains committed to empowering communities through strategic partnerships, sponsorships, and initiatives that foster development.



COMPANY RECOGNITION

NBI welcomes EY's Interim Evaluation Report, which highlights the NBP's success in bridging Ireland's digital divide. The report outlines key benefits, including:

- Improved market competition.
- Increased employment opportunities.
- Enhanced quality of life for rural communities.

With 60% of the intervention area already constructed, uptake rates continue to exceed expectations. Even historically underserved locations, such as Black Valley, in Co. Kerry, now have high-speed broadband, marking a major milestone in digital equity.

The recognition of our progress in the EY Interim Evaluation Report reaffirms our commitment to creating sustainable, inclusive digital infrastructures that empower communities. As we progress our network build, we remain dedicated to building strong, digitally inclusive communities that thrive in an increasingly connected world.

As we continue to make meaningful progress in empowering rural communities, we also remain committed to upholding the highest standards of responsible business conduct. Our efforts to create a more sustainable and equitable society are grounded in our commitment to ethical practices, governance, and long-term value creation for all stakeholders.

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At NBI, our mission is to empower every community across Ireland by providing the essential connectivity that drives social and economic progress. By bridging the digital divide, we are unlocking opportunities for innovation, education, and economic growth, ensuring that no community is left behind."

—— Tara Collins, —— Chief Marketing Officer

Our Commitment to Responsible Business Conduct









'Field audits completed on contractors to ensure continued compliance – this includes HSQE Audits, Temporary Traffic Management Audits (TTM) and Environmental Compliance.



NBP PROJECT OVERSIGHT

In 2024, NBI continued to benefit from the robust governance structures established under the contract with the Department of the Environment, Climate, and Communications (DECC). This ensures transparency, accountability, and ethical conduct in the rollout of Ireland's high-speed broadband network under State intervention. Key governance improvements made in 2024 included:

- Adjusting the frequency of Working Group (WG) meetings to align with programme maturity.
- Introducing clearer decision-making guidelines and escalation processes.
- Streamlining WG membership for more targeted discussions.

These enhancements have ensured continued strength in governance and oversight, ensuring efficiency, integrity, and transparency.

CORPORATE GOVERNANCE

NBI's governance framework is grounded in integrity, transparency, and accountability, supporting both business success and sustainability objectives. In 2024, our governance continued to align with best practices and ESRS G1 – Business Conduct, focusing on:

- Ethical Oversight: The Board ensures compliance with NBI's Code of Conduct, anti-corruption policies, and human rights commitments. Code of conduct training is provided at all management levels.
- Transparency in Reporting: NBI has expanded non-financial disclosures to align with ESRS requirements, addressing key ESG risks and sustainability considerations.
- Risk Management: ESG risks, including corruption and conflicts of interest, are integrated into risk management frameworks and reviewed at the Board level.
- Stakeholder Engagement: Stakeholder feedback informs governance decisions, ensuring fair treatment and transparency.

As part of this ongoing commitment, NBI further aligns its governance approach with our core values, ensuring sustainable and ethical practices across all levels of the organisation.

Corporate Governance Values

NBI's governance is built on core values of integrity, transparency, respect, and accountability.

Stewardship of NBI	The Board has a role in safeguarding shareholder interests, as well as guiding management's implementation and delivery of NBI's strategy and objectives.
Transparent Ways of Working	That the Board and Senior Management Team's own business, and its interactions with management, are conducted in an open and clear manner for all Board members.
Board Composition and Balance	The Board regularly assesses its composition and composition of its sub- committees to ensure compliance with the Project Agreement with the Irish Minister for the Environment, Climate and Communications.
	The Board and its sub-committees should have the right balance of cognitive and personal strengths to promote effective decision-making.
Effective Policies and Procedures	The Board and the SMT works to assure shareholders and the Department of Communications (DECC) that the policies and practices of NBI are effective and enforced by management in achieving their objectives and complying with the Project Agreement and any other laws.
Appropriate Level of Governance	Supported by Internal and External Audit, the Board and SMT assesses whether the Corporate Governance Framework and associated activities are appropriate for NBI's profile, size and complexity.
Communication between the Board and SMT	There are mechanisms and routines in place for regular and effective communication of information between the Board, SMT, shareholders and the DECC.
Assessment of Performance	The Corporate Governance Framework supports providing the Board with a clear view of NBI performance. This includes performance against objectives, key performance indicators, accurately and timely management information and performance appraisal that, where appropriate, is linked to remuneration.



Sustainability Governance

Strong leadership, oversight, and accountability drive NBI's ESG integration. Our governance framework ensures that sustainability principles are embedded into business strategy and risk management.

Board and ESG Oversight:

- The Audit & Risk Committee ensures strategic alignment and oversight of sustainability initiatives.
- The Board regularly reviews ESG performance and emerging risks.
- Directors conduct yearly ESG training.

Risk Management:

- ESG risks are integrated into the Enterprise Risk Management framework.
- Internal sustainability controls are reinforced through assurance processes.

STAKEHOLDER ENGAGEMENT

Effective engagement strengthens governance, ensuring ethical conduct and transparency. In 2024, NBI strengthened its stakeholder engagement approach to align with ESRS G1, enhancing legitimacy by mapping and engaging relevant stakeholder groups, ensuring inclusivity through targeted outreach methods, and increasing responsiveness by integrating feedback into our ESG decision-making processes. Engagement ensures that stakeholders receive accurate and relevant information while maintaining strict confidentiality and safeguarding commercially sensitive data.

The NBP contract identifies key stakeholder groups with whom NBI maintains ongoing communications to fulfil contractual obligations and ensure transparent, accountable interactions.

These groups include:

- Stakeholder Group 1: End Users.
- Stakeholder Group 2: NBI's Customers (Broadband Service Providers / Retail Service Providers).
- Stakeholder Group 3: Government.
- Stakeholder Group 4: Other Stakeholders (including civic society, membership bodies, and representative organisations).

2024 Stakeholder Engagement Initiatives:

- Aligned Workshops: Conducted sustainability workshops tailored to meet regulatory expectations.
- Regular Feedback Mechanisms: Established surveys and forums to capture stakeholder perspectives.

Governance of Change Management

NBI applies a structured Change Management approach, grounded in the Prosci ADKAR model (Awareness, Desire, Knowledge, Ability, Reinforcement), to guide the implementation of sustainability initiatives. Recognising the varying impacts of ESG objectives, we tailor stakeholder engagement based on influence and alignment with sustainability goals. In 2023, our Phase 1 Organisational Change Impact Assessment segmented business units by High, Medium, and Low impact. In 2024, this evolved into an ESG Change Impact Assessment using a stakeholder salience model that prioritised feedback based on Impact Level, Level of Support, and Reason for Support. This ensures engagement efforts are focused where they have the greatest influence on ESG outcomes.

By embedding targeted engagement and adaptive change management into our culture, we enhance our ability to meet evolving regulatory requirements, strengthen compliance, and align sustainability governance with legal obligations, industry standards, and stakeholder expectations.

REGULATORY COMPLIANCE

Regulatory compliance remains central to NBI's governance, ensuring adherence to legal and industry standards. Our 2024 compliance initiatives included:

- Collaborating with regulatory bodies to ensure adherence to national regulations.
- Enhancing information security to safeguard critical data and infrastructure.

By adhering to these compliance frameworks, we ensure that our operations are secure and aligned with both regulatory requirements and industry best practices.

Commission for Communications Regulation Overview

As Ireland's national regulatory authority for communications, Commission for Communications Regulation (ComReg) ensures fair and efficient market practices. NBI complies with ComReg's regulations, promoting competition and safeguarding end-users' interests in line with public obligations.

Cybersecurity

In response to evolving cyber threats, we prioritise safeguarding our digital infrastructure and critical systems to ensure availability, authenticity, integrity, and confidentiality. Our cybersecurity strategy aligns with international standards such as Centre for Internet Security (CIS), National Institute of Standards and Technology (NIST), and International Organisation for Standardisation (ISO), and we actively engage with industry forums and European telecoms for knowledge sharing and readiness.

We are committed to maintaining a secure, resilient, and sustainable digital environment. As the cybersecurity regulatory landscape continues to evolve – particularly with the introduction of the EU Network and Information Systems

Directive 2 (NIS2) and the forthcoming Cybersecurity Bill in Ireland – we are proactively enhancing our security posture to ensure both compliance and long-term operational resilience.

Key Areas of Focus:

- Regulatory Engagement & Alignment: We actively collaborate with national supervisory authorities, including ComReg and the National Cyber Security Centre (NCSC), to support a harmonised and informed approach to compliance. This includes ongoing review of emerging regulations and guidance to ensure our internal controls remain aligned.
- Readiness & Assurance: We have undertaken independent assessments to evaluate our preparedness, including third-party reviews of our risk management strategies. These efforts reinforce our ability to meet new legislative requirements and ensure enterprise-wide accountability.
- Security Governance: Our cybersecurity framework is regularly assessed across operational, physical, and digital domains, and is aligned with internationally recognised standards. We maintain ISO/IEC 27001 certification for Information Security Management and ISO/IEC 27701 for Privacy Information Management.
- Cyber Risk Management: We apply a risk-based approach to identifying and mitigating threats, ensuring protection of critical infrastructure and sensitive data. This includes supply chain risk assessments and contractual security requirements for third-party vendors.
- Security Culture & Awareness: We foster a strong security culture through secure practices, stringent access controls, and continuous training and awareness initiatives for all employees.

- Incident Response & Business Continuity: Our structured incident management processes are aligned with regulatory expectations and include disaster recovery and continuity planning to minimise disruption and safeguard service delivery.
- Continuous Improvement & Adaptation: We have embedded a defense-in-depth strategy and maintain a cycle of continuous review and improvement to ensure our cyber resilience evolves with the threat landscape.

These collective efforts underpin our broader commitment to governance, resilience, and the secure operation of our digital infrastructure in service of our stakeholders and communities.

Disclosures in Alignment with Regulatory Reporting Frameworks – the ESRS

As outlined in the 'Basis for Preparation,' NBI is committed to transparency and responsible governance. While the Corporate Sustainability Reporting Directive (CSRD) may not formally apply to us, we have chosen to broadly align our reporting with the European Sustainability Reporting Standards (ESRS), leveraging the framework and guidance developed by the European Financial Reporting Advisory Group (EFRAG) as a benchmark for best practice.

This alignment supports our ambition to integrate sustainability more deeply into corporate governance and operational decision-making. It enables greater accountability, enhances our risk management approach, and ensures that our disclosures are comparable, structured, and responsive to evolving stakeholder and regulatory expectations. By taking a phased and practical approach, we aim to drive meaningful progress and long-term value creation through consistent, data-driven reporting.

MATERIAL GOVERNANCE-RELATED IMPACTS, RISKS & OPPRTUNITIES

Note: G1 – Business Conduct (as defined by the ESRS framework) addresses the material impacts, risks, and opportunities related to ethical business practices, governance structures, and compliance. This section outlines NBI's commitment to maintaining transparency, accountability, and integrity in all aspects of our operations.

- Material Impact: The role of strong governance, ethical decision-making, and compliance in fostering trust among stakeholders and ensuring long-term business resilience.
- Material Risk: Potential risks including regulatory noncompliance, unethical business practices, reputational damage, and financial penalties.
- Material Opportunity: Strengthening corporate
 governance, enhancing stakeholder confidence, mitigating
 risks through robust compliance frameworks, and driving
 long-term value creation through ethical leadership and
 responsible business conduct.

By embedding ethical business practices into our governance framework, NBI is committed to upholding the highest standards of integrity and accountability, ensuring sustainable growth and responsible corporate citizenship. This section outlines the key governance-related material impacts, risks, and opportunities shaping NBI's governance strategy.

Responsible Business Conduct						
G1 - Business Conduct	Material Impact	Material Risk	Material Opportunity			
G1-1: Corporate Culture	Positive: Strong culture of loyalty and ethical behaviour.	Risk of declining corporate culture leading to ethical breaches and employee disengagement.	We are actively seizing this opportunity by fostering a transparent and inclusive corporate culture through ongoing ethics training and open communication.			
G1-5: Fair Supplier Relationships	Positive: Strengthening supply chain resilience.	Risk of weakened supplier relationships leading to disruptions in supply chains.	We are capitalising on this opportunity by evaluating supplier criteria to strengthen supply chain resilience and ensure alignment with our values and regulatory requirements.			



ETHICAL BUSINESS CONDUCT

NBI is committed to ensuring that our ESG efforts translate into meaningful action through robust corporate governance. Our governance structures integrate ESG considerations into every aspect of decision-making, from board-level strategy to day-to-day risk management and operational practices.

POLICIES & COMMITMENTS

NBI has established robust governance structures to integrate ESG considerations into decision-making. Our Board of Directors ensures sustainability is central to strategy through regular ESG performance reviews. A committee oversees progress, regularly evaluating key ESG risks, opportunities, and performance metrics.

In line with our commitment to ethical business practices, we uphold a strict Code of Conduct for employees, contractors, and suppliers. Our policies on anti-corruption, bribery, and responsible business practices ensure high standards of integrity across all operations.

We provide clear mechanisms for reporting and addressing concerns related to unethical behaviour, legal violations, or code of conduct breaches. Employees and stakeholders can report issues through multiple channels, including management, a confidential whistleblower hotline, or internal platforms. All reports are thoroughly considered to ensure fairness, and whistleblower protection is guaranteed, safeguarding individuals from retaliation.

NBI's Anti-corruption and Bribery Policy includes comprehensive measures to prevent and address corruption and bribery, aligning with the United Nations Convention against Corruption. We also conduct mandatory training on ethical practices and have a structured investigation process with independent oversight.

Training modules, such as "Speak Up and Whistleblowing", support a compliance culture. No systemic risks or incidents have been identified, suggesting the training is effective in maintaining a strong ethical framework.

This commitment ensures a transparent, accountable, and ethically responsible organisation. Building on these principles, we have outlined the following key governance goals for 2024.

KEY GOVERNANCE GOALS FOR 2024

- ESG Oversight: Strengthening board accountability by embedding ESG considerations into strategic decision-making.
- Transparent ESG Reporting: Aligning our ESG disclosures with key regulatory standards, ensuring clarity, accountability, and actionable insights for stakeholders.
- Cybersecurity & Data Governance: Implementing advanced security measures to safeguard sensitive stakeholder data and ensure compliance with international data protection regulations.
- Ethical Business Conduct: Ensuring 100% compliance with our Code of Conduct, maintaining the highest standards of integrity across our operations.
- Sustainability Integration in Procurement:
 Embedding ESG goals into procurement, conducting ESG risk assessments, and informing future policy and supplier criteria.

GOVERNANCE ACTIONS

To drive our ESG agenda, we have implemented the following actions:

- Enhanced ESG Oversight: A committee of the Board conducts quarterly reviews, integrating ESG risks into enterprise risk management and annual business planning.
- Transparent ESG Reporting: We voluntary align our ESG reporting with regulatory frameworks, such as the CSRD and ESRS to ensure comparability and transparency, ensuring that stakeholders—investors, customers, employees, and the broader community are kept informed about our progress.
- Cybersecurity & Data Protection: NBI has implemented robust cybersecurity measures, conducting regular security audits and updates to data governance policies in line with the EU's Network and Information Systems Directive 2 (NIS2).
- Ethical Business Conduct: All employees are required to complete mandatory training on the Code of Conduct, and a zero-tolerance policy for unethical behaviour is enforced.
- Sustainability Integration in Procurement: We are integrating ESG goals into procurement practices and are working closely with suppliers to identify and manage ESG-related risks across the value chain.

TARGETS & PERFORMANCE

As part of our ongoing commitment to transparency and accountability, we have set the following ESG targets for 2024:

- **ESG Oversight:** Achieve board-level ESG oversight and accountability by the end of 2024.
- Transparent ESG Reporting: Align non-financial disclosures with ESRS guidelines by year-end 2024.
- Cybersecurity & Data Protection: Implement and maintain a robust cybersecurity program; complete annual audits aligned with industry best practices.
- Ethical Business Conduct: Ensure 100% employee compliance with the Code of Conduct through training and oversight.
- Sustainability in Procurement: Assess high-impact suppliers for ESG compliance and develop a Supplier Code of Conduct by the end of 2025.

COMMITMENT TO CONTINUOUS IMPROVEMENT

In response to regulatory requirements, NBI has made several key enhancements to our governance practices:

- Expanded Stakeholder Engagement: Broader engagement to meet sustainability reporting requirements, ensuring we address a wider array of ESG concerns.
- **Risk Management:** Strengthened internal controls and risk management frameworks to better identify and address ESG risks.
- Governance Oversight: NBI's Green Team—our crossfunctional internal sustainability committee—plays a key role in embedding ESG considerations into decisionmaking, guiding our response to emerging regulatory and stakeholder expectations.
- Commitment to Transparency: Increased sustainability disclosures to reflect key ESG issues, improving our transparency and ensuring stakeholder confidence.

These actions ensure that NBI is well-positioned for continued success in sustainability governance, with a strong foundation for ongoing improvements.

LOOKING AHEAD: STRATEGIC FOCUS FOR 2025 AND BEYOND

As NBI progresses with the NBP, governance remains a core focus. In 2025, we will continue to enhance our governance practices to support the successful completion of the NBP and adhere to sustainability reporting requirements. By embedding ethical conduct and strong internal controls, we aim to foster trust, integrity, and long-term success.



Closing Statement

At NBI, sustainability is not a separate agenda - it's ingrained in our mission to deliver a world class, high-speed broadband service that enables equal access to every person in the Irish State's Intervention Area.

Our commitment to environmental responsibility, social inclusion, and strong governance drives every decision, ensuring that the digital future we are building today is also a sustainable and equitable one.

TOGETHER, WE ARE DELIVERING TODAY WHILE PROTECTING TOMORROW.

