



NBI's Annual Sustainability Report 2025

Delivering today, protecting tomorrow.



Contents

• Building A Limitless Ireland — 03

- Message From The CEO's
- NBI At A Glance
- Delivering The National Broadband Plan
- 2025 Company Awards

• Our Approach To Sustainability — 09

- Introduction
- Basis for Preparation of Sustainability Statement
- Statement on Due Diligence
- Business Model & Value Chain
- Double Materiality Assessment (DMA)
- Alignment with the UN SDGs
- Key ESG Commitments & Goals
- Tracking our Progress

• Our Environmental Commitment — 29

- Climate Strategy
- Material Climate-Related Impacts, Risks & Opportunities
- ESG Policy
- Climate Actions
- Targets & Performance
- Decarbonisation Framework
- Climate Governance & Accountability

• Our Social Commitment — 38

- Our People
- Our Culture
- Developing Our People
- Health & Safety
- Material Workforce-Related Impacts, Risks & Opportunities
- Internal Workforce Policies & Commitments
- Targets & Performance
- Our Impact
- Material Community-Related Impacts, Risks & Opportunities
- Community Investment & Support

• Our Governance Commitment — 59

- NBP Project Oversight
- Corporate Governance
- Stakeholder Engagement
- Regulatory Compliance
- Material Governance-Related Impacts, Risks & Opportunities
- Ethical Business Conduct
- Policies & Commitments
- Key Governance Goals For 2025
- Governance Actions
- Targets & Performance
- Commitment To Continuous Improvement
- Looking Ahead: Strategic Focus For 2026 And Beyond

• Closing Statement — 67

Building a Limitless Ireland

Ireland's Blueprint for a Connected and Sustainable Future

Ireland is leading Europe's digital transformation through its ambitious National Broadband Plan (NBP), designed to bridge the digital divide and create a more connected society.

More than six years into the main rollout, National Broadband Ireland (NBI) has exceeded delivery targets and by the end of 2025, NBI passed 451,433 premises, with approximately 80% of the State's Intervention Area (IA) ready for connection. To date, 164,708 homes, farms, and businesses have been connected, with take-up rates surpassing original projections and outperforming international benchmarks.

NBI's progress is underpinned by strong Environmental, Social, and Governance (ESG) principles. By embedding ESG into every aspect of our operations, we are delivering cutting-edge digital infrastructure, while ensuring long-term sustainability, responsible business practices, and positive social impact. This transformation is unlocking the economic potential of rural Ireland.

Through strategic stakeholder engagement and an unwavering focus on customer service, we are bridging rural-urban gaps, transforming lives, empowering businesses, and setting a benchmark for sustainable digital infrastructure.

*NBI's contract year with the Irish state runs to the 31st of January



MESSAGE FROM THE CEO'S



It's a privilege to lead NBI through this next phase, building on a project that is already one of Ireland's most significant infrastructure achievements. I have been driven by our mission to deliver high-speed fibre broadband on time and on budget - a purpose we continue to fulfil, even amid inflation, supply pressures and regulatory changes.

Under my leadership, our priorities for 2025 were clear:

- Ensure robust operations and resilience, with predictability and pace.
- Drive take-up in hard-to-reach areas, creating more opportunities for people to stay connected.
- Further embed ESG performance - from energy efficiency and health & safety to inclusive stakeholder governance and community impact.

Our approach to sustainability is practical and integrated. By embedding low-carbon practices, aligning with recognised standards, and improving operational efficiency, we support Ireland's transition to a greener economy while delivering on our core mission.

Recent storms, including Darragh and Eowyn, reinforced the importance of climate resilience and disaster recovery planning. We are adapting our infrastructure strategy to protect the network against more extreme weather events - investing in redundancy, hardening critical sites, and improving response protocols.

Together, we're not just bridging the digital divide - we're powering economic growth, enabling remote healthcare and education, and reinvigorating rural communities.

TJ Malone,
CEO NBI-Infrastructure



As CEO of NBI-Deployment, I'm focused on translating legal and governance excellence into deployment excellence on the ground. I've tackled the many challenges of delivering rural broadband infrastructure - balancing risk, regulation, and relationships - to bring structure and accountability to one of Ireland's largest infrastructure undertakings.

In 2025, our deployment team:

- Continued to deliver the final phase of the build with focus on safety, quality, and sustainability.
- Maintained rigorous standards in energy use, health & safety, and partner governance.
- Expanded access and connectivity in our most underserved communities, ensuring every farm, school, and business is included.

Storms Darragh and Eowyn demonstrated the value of robust climate-resilience planning across the sector. We are embedding resilience into every stage of deployment, reinforcing network design, improving emergency response, and working closely with partners to ensure continuity even under extreme conditions. Early improvements made during the year supported stronger performance and improved continuity during storms in the latter part of the year.

By embedding resilient and sustainable practices, we make every connection count—empowering communities and supporting Ireland's long-term digital future.

With shared purpose and strong leadership, we're building not just a network, but a sustainable digital legacy for Ireland.

Jenny Fisher,
CEO NBI-Deployment

NBI AT A GLANCE

NBI is delivering transformative connectivity to rural and underserved communities across Ireland. Through the National Broadband Plan, we are ensuring that over 1.1 million people in the State's Intervention Area have access to high-speed fibre broadband – closing the digital divide and enabling equal opportunity.

Our wholesale fibre network now underpins Ireland's digital economy, serving 72 broadband providers, driving competition, affordability, and service innovation. This infrastructure empowers remote work, digital education, telehealth, and rural enterprise - unlocking economic potential and reducing reliance on carbon-intensive travel. Fibre technology is significantly more energy-efficient than legacy networks, supporting Ireland's climate goals.

Six years into the rollout, NBI remains focused on completing delivery, enhancing network resilience, and embedding sustainability into every aspect of our operations - helping Ireland achieve its climate and connectivity ambitions.



Company Structure

To effectively deliver the National Broadband Plan in the State's Intervention Area (IA), National Broadband Ireland (NBI) operates through two specialised entities with distinct but complementary responsibilities:



NBI Infrastructure DAC

The contracting entity to the NBP Project Agreement with the Department of Culture, Communications and Sport. It oversees connections to the network, network operations, service delivery, infrastructure management and long-term asset management.



NBI Deployment DAC

Operating under subcontract to NBI Infrastructure, this entity manages the network rollout, including planning, design and construction of the fibre network in partnership with suppliers, contractors and delivery partners.

This structure enables clear governance, ensures efficient delivery, and strong oversight of both deployment and operations as the programme transitions from built to long-term service provision. This organisational model also supports NBI's commitment to responsible governance and sustainable infrastructure delivery.

DELIVERING THE NATIONAL BROADBAND PLAN

Bringing Connectivity and Opportunity to Rural Ireland

NBI continues to deliver the NBP ahead of contractual schedule transforming rural communities and creating new social and economic opportunities across the country.

To date (31st Jan 2026), NBI has passed 451,433 premises, with c. 80% of the State's Intervention Area now ready to connect. The rollout remains firmly on track, with 100% of premises (567,269) either constructed or under construction. We anticipate that the IA figure will continue to grow as new homes are built and additional premises are designated within the IA. Demand for high-speed fibre continues to grow, with 164,708 homes, farms and businesses already connected to the NBI network.

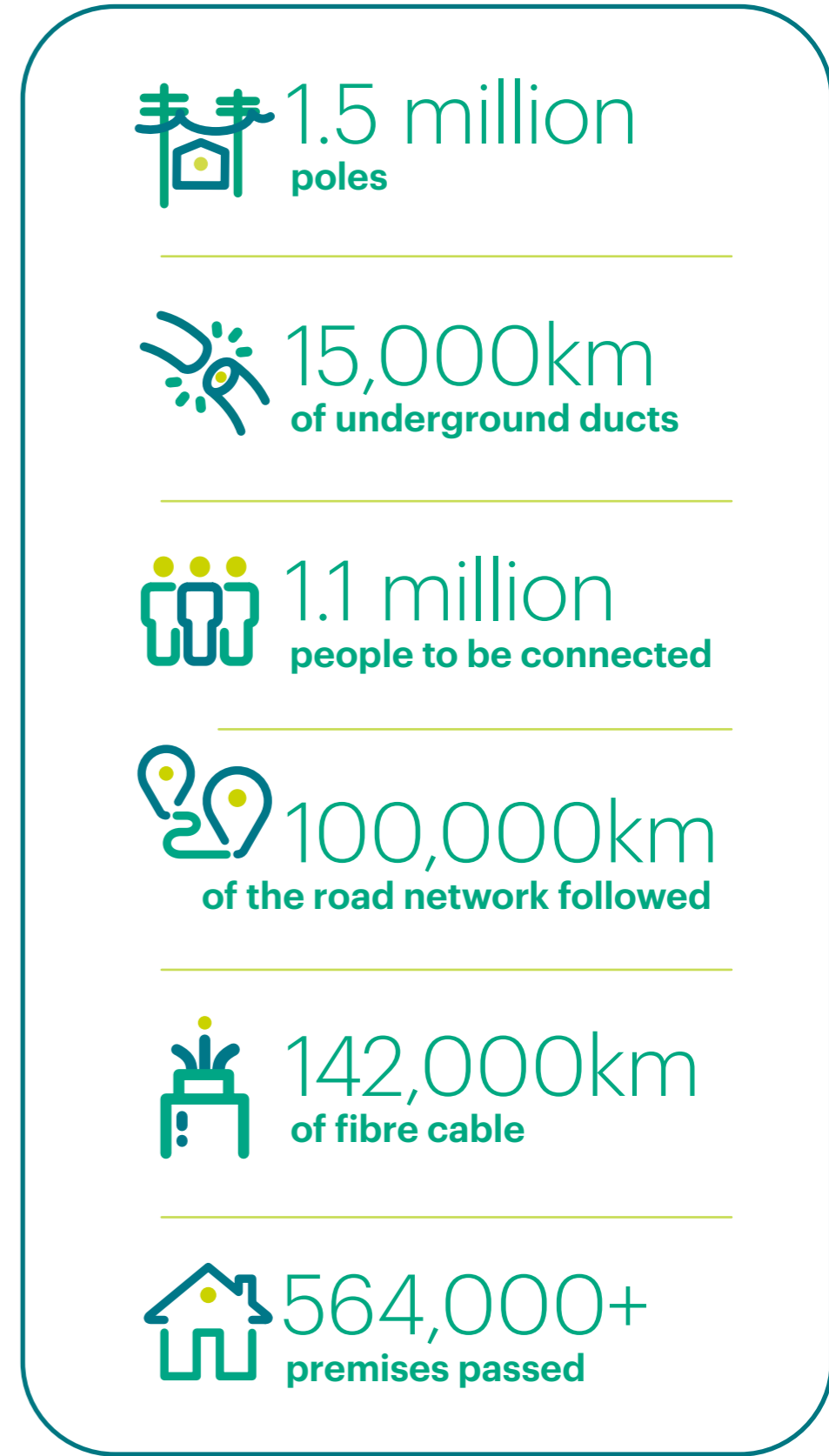
955 Broadband Connection Points (BCPs) have been installed nationwide, including 672 in schools, supporting digital education and community access. Delivery of island connectivity is progressing, with connections planned for 27 Irish islands - and 16 already online.

As deployment progresses, NBI is increasingly focused on optimising network operations, enhancing resilience, and preparing for long-term service delivery. Reliable fibre connectivity is enabling more people to work remotely, cutting commuting times and reducing transport-related emissions. Farmers are adopting smart technologies to improve resource efficiency, while rural businesses gain access to global markets, boosting local economic resilience and innovation.



Sustainability remains core to NBI's network design. By expanding digital access, NBI is helping to reduce rural isolation, support lifelong learning, and empower every community to participate in Ireland's digital and green economy. NBI is closing Ireland's digital divide. Communities such as the Black Valley in Kerry, once the last to receive mains electricity, now enjoy fibre speeds comparable to major cities, opening opportunities unimaginable a generation ago.

And in 2025, Achill Island marked another major milestone, as we celebrated the arrival of high speed fibre in one of Ireland's most remote communities.





Delivering a Resilient Broadband Network for Ireland

National Broadband Ireland (NBI) continues to deliver the National Broadband Plan (NBP) on time and on budget, despite launching construction during the Covid19 pandemic and expanding the scope by approximately 30,000 premises beyond the original contract.

As an open access wholesale network, NBI enables strong competition among 72 Broadband Providers, ensuring improved service quality and affordable pricing for consumers and businesses. This progress supports Project Ireland 2040, the EU Digital Decade 2030 targets, and national readiness for the Copper Switch Off, a key step in Ireland’s transition to a fully digital future.

Sustainable Infrastructure and Network Resilience

NBI’s network is designed using future proofed fibre technology, delivering typical availability levels of 99.95%. In line with State Aid commitments, NBI prioritises the reuse of existing infrastructure such as poles and ducts — accelerating deployment, reducing environmental impacts, and ensuring value for money for the State.

Key Resilience Measures

Our network is built in rings, meaning if a cable is damaged, the service automatically switches to another route so customers stay connected.

- We are continuing to close these rings as part of the main build programme, which makes the network even more reliable over time.
- More than 135,000 old or damaged poles have been replaced, helping to protect the network from weather-related issues.
- NBI runs 205 local fibre hubs, each with a battery backup. We also use mobile generators to keep services running during power cuts.
- After Storm Eowyn, we invested in better monitoring tools so we can detect and fix faults faster and reduce downtime.
- We work closely with ESB, who help prioritise getting power back to critical network sites during large-scale outages.

Continuous Improvement

NBI actively incorporates lessons learned from extreme weather events to strengthen:

- Network maintenance practices.
- Internal resourcing models.
- Contractor coordination.
- Customer communication frameworks.

Monthly industry forums ensure alignment with our customers, the Broadband Providers on feedback, priorities, and implementation timelines.

NBI is proud to have built not only a worldclass fibre network but also an organisation equipped to plan for, withstand, and respond to climate related disruptions. This commitment ensures the long-term resilience and sustainability of the network throughout the duration of the contract with the State - and supports Ireland’s transition to a Gigabit enabled, low carbon future.



Impact KPIs	2023	2024	2025
Cumulative homes passed by fibre networks	216,898	337,440	451,433
Cumulative homes connected by fibre networks	69,130	114,386	164,708
Cumulative km of fibre networks installed	35,223km	59,004km	81,772km

2025 Company Awards

In parallel with strengthening the resilience and sustainability of Ireland's national fibre network, 2025 marked a year of significant external recognition for NBI. These awards reflect not only the scale and complexity of the programme, but also the organisation's commitment to innovation, transparency, responsible procurement, and customer-focused delivery.

Across strategy, communications, procurement, project management, ESG, research, and media, NBI's work was acknowledged as best in class by respected national and international bodies. This recognition reinforces the impact of the National Broadband Plan and highlights the collaborative effort of teams, partners, and suppliers across the country.



A particularly proud moment came when NBI's Project Management Office (PMO) was named PMO of the Year at the National Project Awards 2025. This award celebrates the dedicated and diverse team of project management professionals who work tirelessly to deliver the National Broadband Plan. Their expertise, discipline, and passion continue to drive the rollout forward, and this recognition stands as a testament to their outstanding contribution and leadership.

Another standout achievement was NBI being named Brand of the Year at the Business & Finance Awards. Presented by UCD Michael Smurfit Graduate Business School, the award recognises NBI's trusted and future-focused national brand, bold leadership, and meaningful impact across rural Ireland. It highlights how the programme is reshaping Ireland's digital landscape while setting a benchmark for international replication.

NBI's rollout was also judged Best in Class at the National Procurement Awards 2025, with the programme commended for its transparency, value for money, and strategic sourcing approach. This recognition was echoed in *The Irish Times*, which praised the National Broadband Plan as a once-in-a-generation infrastructure project delivered with ambition and operational excellence. Further awards across ESG transparency, creative communications, innovation, research, customer experience, and media — including Gold wins at the Effie Awards, recognition at ESRI's Customer Success Awards, and the Grand Prix at the TAMIs — demonstrate the breadth of capability across the organisation. These achievements reflect strong cross-functional performance spanning engineering, data, engagement, and public service delivery. Together, these honours reinforce NBI's ambition to deliver a world-class fibre network while maintaining the highest standards of governance, sustainability, customer experience, and public value.

Our Approach To Sustainability

Our Purpose

We connect Ireland for a sustainable, inclusive future. Through equitable access to high-speed fibre broadband, we enable digital inclusion, strengthen regional economies, and support environmental efficiency. Our network provides the foundation for a resilient, future-ready society.

Our Role

NBI is delivering and operating the fibre network within the State's Intervention Area under the National Broadband Plan (NBP), one of Europe's most ambitious digital infrastructure projects. As we transition from deployment to long-term operations, we continue to embed Environmental, Social, and Governance (ESG) principles decision-making, contractor management, and network stewardship.

Why It Matters

Broadband is critical national infrastructure. It is an enabler of digital inclusion, economic participation, and climate resilience. By ensuring equitable access to fibre broadband, we help address Ireland's connectivity challenges while supporting a more inclusive and sustainable society.



INTRODUCTION

NBI's 2025 Sustainability Statement builds on our 2024 foundations and continues to broadly align 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).

This report provides stakeholders with a transparent disclosure of our sustainability performance, including our material impacts, risks, and opportunities (IROs) across the value chain. In 2025, we reviewed our double materiality assessment, refined our emissions baseline (2024), and further integrated sustainability considerations into risk management, governance structures, and operational processes as the organisation transitions into steady-state operations.

Sustainability at NBI is a holistic, risk-based practice - focused on governance, stakeholder engagement, contractor oversight, and the evaluation of environmental and social impacts associated with operating a national fibre network.

This section outlines our reporting basis and scope, demonstrating how sustainability oversight supports NBI's strategic objectives and enhances the long-term resilience of Ireland's broadband infrastructure.



Report Structure

General Disclosures

This section outlines our strategic framework, including how governance, risk management, double materiality and value chain insights inform decision-making across our business. By embedding sustainability into our operational model and broadly aligning with the ESRS, we ensure that our approach to managing impacts, risks, and opportunities remains robust, proportionate, and relevant to the long-term operation of national broadband infrastructure.

Environmental

This section outlines NBI's approach to environmental management across the full lifecycle of our network. In 2025, we continued maturing our emissions accounting and reduction planning following the establishment of our 2024 baseline. As the organisation transitions to steady-state operations, our environmental focus shifts toward operational emissions, contractor management, and resource efficiency measures that reduce the long-term footprint of national fibre infrastructure.

Social

This section outlines NBI's commitments to Diversity, Equity and Inclusion (DEI), workforce safety, and community engagement. As we move from network construction into long-term operations, our social impact increasingly centres on promoting digital inclusion, supporting local communities, and enabling equitable access to high-quality broadband, particularly in rural and underserved areas.

Governance

This section outlines NBI's governance framework, including our commitment to ethical business conduct, regulatory compliance, and strong oversight mechanisms. We describe how governance structures, policies, and controls support responsible decision-making and mitigate risks such as bribery, corruption, and unethical behaviour. Our adherence to the Code of Conduct and robust governance ensures accountability and integrity across our value chain.

BASIS FOR PREPARATION OF SUSTAINABILITY STATEMENT

This sustainability statement has been prepared with reference to the European Sustainability Reporting Standards (ESRS) and informed by the implementation guidance issued by the European Financial Reporting Advisory Group (EFRAG) in support of the Corporate Sustainability Reporting Directive (CSRD).

In 2025, NBI continued to mature its alignment with the ESRS, building on the foundational work completed in 2024. Our reporting focuses on the disclosures most relevant to our business model and value chain, as identified through our double materiality assessment, while supporting future progression toward enhanced transparency and audit-readiness.

The establishment of our 2024 emissions baseline and strengthened internal data-collection processes have enabled more consistent environmental, social, and governance measurement across the organisation. We also draw on the United Nations Sustainable Development Goals (SDGs) to contextualise our broader sustainability ambitions. An overview of our SDG alignment is provided later in this section.

Reporting Principles

To ensure credibility, clarity, and transparency, NBI applies the following principles in preparing its sustainability disclosures:

- **Double Materiality**
Assessing ESG topics through both financial and impact perspectives.
- **Relevance**
Prioritising matters with the most significant impacts, risks, and stakeholder interest.
- **Accuracy & Completeness**
Strengthening data integrity through review, validation, and internal controls.
- **Comparability**
Ensuring consistent methodologies to support industry benchmarking.
- **Clarity & Accessibility**
Presenting data in a structured and accessible format.
- **Balance**
Communicating both progress and areas requiring further development.
- **Responsiveness**
Incorporating stakeholder feedback informs our evolving approach.
- **Consistency**
Establishing repeatable reporting practices to support repeatability and audit readiness.



Data Collection and Measurement

NBI collects both quantitative and qualitative data to support transparent ESG reporting across the organisation and its value chain. This includes:

- **Environmental Data:** Energy consumption and greenhouse gas emissions which allows measurement against our 2024 baseline.
- **Social Data:** Workforce demographics, employee wellbeing, health and safety outcomes, and community engagement impacts.
- **Governance Data:** Governance structures, ethical conduct, compliance, and risk management processes.

Data is consolidated and reviewed to ensure completeness and reliability, aligned with our reporting principles and proportional to the scale of our operations.

Transparency and Accountability

We prioritise ESG topics with material financial, social, and environmental implications for NBI and its stakeholders. By applying consistent methodologies and strengthening internal data governance, we support comparability over time and informed decision-making.

This approach underpins our maturing broad alignment with the ESRS and supports continuous improvement in future reporting cycles.

Forward-Looking Statements

This report contains forward-looking statements related to NBI's anticipated ESG performance. These statements are based on current assumptions and may change as our strategy evolves and external conditions shift. They should therefore not be interpreted as firm commitments.

To support responsible interpretation, we outline the key assumptions underlying our projections, including emissions-reduction pathways and relevant operational expectations. NBI's due diligence framework enables us to identify and manage ESG-related impacts, risks, and opportunities (IROs) dynamically as we transition from network deployment into long-term operation of the infrastructure.





STATEMENT ON DUE DILIGENCE

At National Broadband Ireland (NBI), we embed sustainability into all areas of our business through a structured due diligence framework. This framework 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. As NBI transitions from large-scale network deployment into long-term operations, our due diligence processes continue to evolve to reflect changing risk profiles across our value chain.

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 and value chain.

2. Identification of Impacts:

Identifies actual and potential adverse impacts on people and the environment across upstream and downstream activities, with defined measures to prevent, mitigate, or remediate impacts where possible.

3. Risk and Opportunity Identification:

Assesses ESG-related risks and opportunities with implications for financial performance, operational continuity and long-term resilience. Findings are integrated into governance, compliance and Enterprise Risk Management (ERM).

4. Materiality Assessment:

Our Double Materiality Assessment is informed directly by due diligence insights, including impact identification, stakeholder engagement, and value-chain analysis. Risks and impacts are evaluated for their relevance to both

financial materiality (effects on NBI) and impact materiality (effects on society or the environment), in accordance with EFRAG guidance. This ensures our materiality process is grounded in real-world evidence and stakeholder perspectives.

5. Stakeholder Engagement:

Engages diverse internal and external stakeholders, including employees, suppliers, contractors, communities affected by the rollout, and government bodies, to inform ESG priorities and provide transparent updates on progress.

6. Continuous Monitoring and Improvement:

Monitors emerging ESG risks, regulatory developments, and best practices to ensure ongoing alignment with legal requirements and evolving sustainability expectations. This includes strengthening data quality, controls and reporting processes.

7. Governance and Accountability:

Integrates ESG due diligence into corporate governance, policies and risk management. Oversight is maintained at Board and senior leadership level to ensure accountability and alignment with NBI's strategic and compliance obligations.

The insights gained through our due diligence framework directly informs our ESG priorities and disclosures, ensuring they are embedded across our operations - from strategic planning to day-to-day decision making - and are aligned with ESRS expectations for impact identification, value chain mapping and continuous improvement.

BUSINESS MODEL & VALUE CHAIN

Driving Digital Transformation

NBI continues to play a central role in advancing digital inclusion by delivering high-speed broadband infrastructure to underserved communities across Ireland. In 2025, our strategic vision remains focused on ensuring equitable access to sustainable digital infrastructure, supporting Ireland's National Digital Strategy and the country's Climate Action Plan.

As NBI transitions from large-scale network build to long-term operations, our sustainability approach emphasises transparency, efficient asset utilisation, responsible procurement, and climate-resilient network performance. We are committed to minimising environmental impact while maximising social and economic value for rural Ireland.

Through collaboration with the government, suppliers, subcontractors and broadband providers, we embed sustainability across all business functions, ensuring that our digital transformation efforts remain aligned with national priorities for climate action, rural development, and social inclusion.

Our Value Chain Connecting Rural Ireland

Upstream Value Chain

Our upstream activities now focus primarily on network operations, maintenance, and targeted build activities. Key components include:

- Responsible procurement and supplier management, guided by NBI's ESG-aligned supplier segmentation (P1-P4), which categorises suppliers by both spend level and ESG impact to prioritise engagement and oversight.

- Asset reuse and circularity, with emphasis on minimising waste and extending the life of network components.
- Efficient network design, repair, and refresh, including preparation for the planned refresh cycle in 2035.
- Fibre migration projects, such as upgrading connectivity for Strategic Community Points (SCPs) and Broadband Connection Points (BCPs).

These activities ensure long-term network resilience and reduce both environmental impact and lifecycle costs.

Downstream Value Chain

NBI provides wholesale access services to broadband providers, enabling high-quality digital connectivity for households and businesses nationwide. Key downstream priorities include:

- Ensuring reliable network operations and strong performance.
- Supporting broadband providers to deliver highspeed services to end users.
- Enhancing digital inclusion through long-term coverage commitments.
- Maintaining customer trust through transparent communication and responsible data management.

Sustainability Integration Across the Value Chain

Sustainability remains embedded in every stage of our value chain, guiding decision-making processes across procurement, operations, stakeholder engagement, and long-term strategic planning:

- Our approach aligns with international best practice by integrating ESG principles into core business processes, enabling us to drive emissions reductions over time.

- Strengthen resilience to climate-related risks and operational interruptions.
- Continue responsible supply chain practices and improved supplier ESG performance.
- Support national digital and climate objectives through equitable and sustainable infrastructure delivery.

To support this integration, NBI completed a Double Materiality Assessment (DMA) in 2024-2025, identifying the most significant impacts, risks, and opportunities (IROs) shaping our long-term sustainability strategy and informing our focus across the value chain.



DOUBLE MATERIALITY ASSESSMENT (DMA)

Process to Identify Material IROs

In 2025, NBI completed an annual review of our DMA to ensure continued alignment with ESRS requirements and developments across our operations and value chain. The review confirmed the majority of 2024 material topics, with minor refinements to reflect our transition from network build to long-term operations.

Our methodology remains grounded in EFRAG guidance and Grant Thornton’s assessment framework, combining qualitative and quantitative analysis to identify sustainability-related Impacts, Risks and Opportunities (IROs). The DMA considers both:

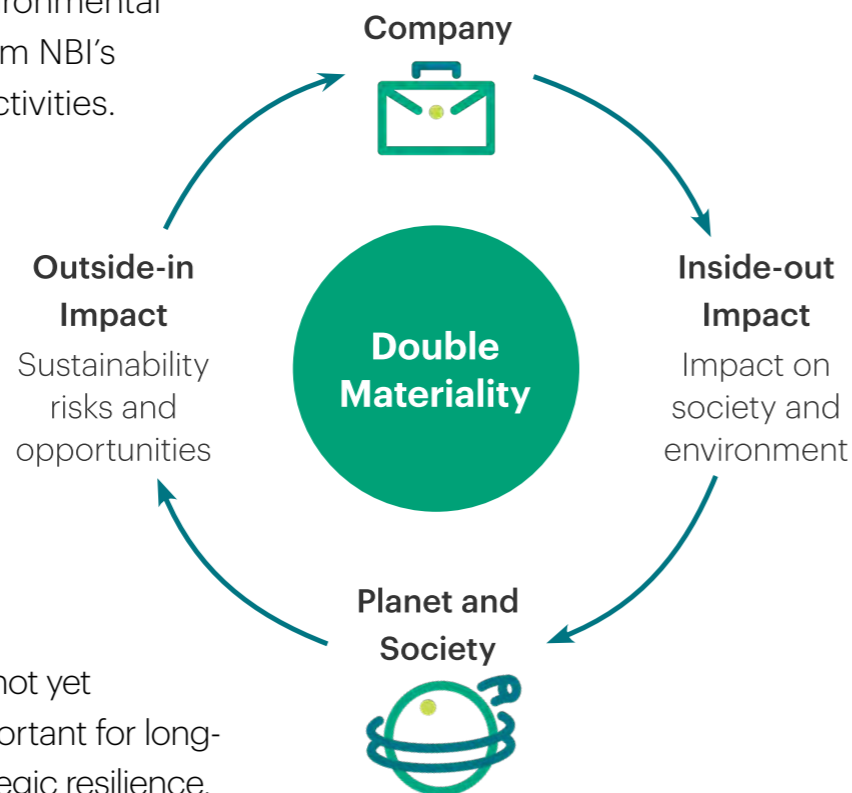
- **Impact Materiality:** NBI’s actual and potential effects on people, the environment, and society.
- **Financial Materiality:** Sustainability-related conditions that could influence NBI’s financial performance, resilience, or cost base.

We updated our process to strengthen alignment with ESRS language and expectations, ensuring a clearer assessment of severity (scale, scope, irremediability), likelihood, and time horizons.

NBI applies a robust materiality lens:

- **Inside-Out Impacts:** The environmental and social impacts arising from NBI’s operations and value chain activities.
- **Outside-In Risks:** External sustainability related risks - such as climate resilience, supply chain constraints, or regulatory shifts that could influence NBI’s financial position or long-term service delivery.

As part of the 2025 review, we reaffirmed that both actual and potential IROs—including those not yet financially material—remain important for long-term scenario planning and strategic resilience.



We reviewed the 2024 DMA to validate the continued relevance of material topics and to identify any IROs requiring refinement based on changes in regulation, operational maturity, or external context.

We conducted targeted engagement with internal experts and external stakeholders - including employees, suppliers, subcontractors, retail broadband providers, government partners, and community representatives - to confirm priorities and emerging issues.

Using updated ESRS-aligned criteria, we reassessed ESG-related IROs across climate, social equity, supply chain impacts, resilience, governance, and business continuity. Assessment criteria included severity, likelihood, financial magnitude, and value chain location.

Findings were reviewed by the Senior Management Team, with final validation by the Audit and Risk Committee (ARC) and Board of Directors to ensure consistency with strategic priorities and risk management.

Updated material topics informed NBI’s ESG strategy and associated Policies, Actions and Targets (PATs), ensuring traceability from materiality assessment through to performance monitoring and reporting.

This process ensures continued alignment with ESRS requirements while strengthening transparency, accountability, and audit readiness.

Key Evaluation Criteria

We apply ESRS-aligned criteria across short (0–2 years), medium (3–5 years), and long-term (5+ years) horizons to prioritise IROs:

1. Impact Materiality:

Assessment considers:

Impact Type: Actual or potential, positive or negative.

Severity:

- Scale of the impact.
- Scope (how many people or environments affected).
- Irremediability (ability to restore the impact).

Likelihood: Likelihood of the impact occurring.

Value Chain Location: Upstream, own operations, or downstream.

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

2. Financial Materiality:

Magnitude: Magnitude of potential financial impacts.

Likelihood: Likelihood of occurrence over defined time horizons.

Material Dependencies: Essential resources, infrastructure, data, or supplier relationships critical to NBI's service delivery.

How We Assess Financial Materiality: Financial materiality evaluates how sustainability-related risks and opportunities may influence NBI's cost base, capital requirements, compliance exposure, and long-term resilience. Each IRO is assessed using:

Magnitude of Financial Impact: Potential financial consequences across the value chain, including supply chain, operational stability, asset refresh cycles, and regulatory requirements.

Likelihood of Occurrence: The probability across short, medium, and long-term horizons.

This assessment is aligned with NBI's Enterprise Risk Management (ERM) thresholds to ensure consistency and inform prioritisation of resources.

Role of Stakeholder Engagement

Stakeholder engagement remains central to validating the relevance of material each stakeholder group, and 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 Providers, End Users.
- **Affected Stakeholders:** Suppliers, Government, Local Communities.

User Stakeholders

Broadband Providers and end users:

- Interests: service quality, affordability, reliability.
- Methods: annual surveys, digital dashboards, ongoing support channels.

Affected Stakeholders

Suppliers, contractors, Government, County Councils, local workforce representatives, and community groups:

- Interests: Contractual fairness, environmental and social performance, compliance, responsible sourcing.
- Methods: Bi-annual supplier reviews, procurement engagement, community consultations, regulatory meetings.



Internal Stakeholders

Employees, SMEs, SMT, ARC, and Board:

- Interests: Governance, health & safety, workforce development, operational resilience.
- Methods: Workshops, risk sessions, interviews, strategy reviews.

How We Engage Stakeholders

- 1. Stakeholder Mapping:** Identification and prioritisation based on influence, vulnerability, and relevance to material IROs.
- 2. Engagement Methods:** Tailored approaches including interviews, surveys, workshops, and bilateral meetings.
- 3. Feedback Mechanisms:** Ongoing dialogue through digital portals, community liaison, supplier ESG reviews, and escalations.
- 4. Transparency & Reporting:** Clear communication on how stakeholder input informs strategy, DMA outcomes, and policy development.

Integration of Stakeholder Insights into Strategy

Stakeholder insights remain central to how NBI shapes its business strategy, operational decisions, and ESG priorities. In 2025, our engagement activities helped strengthen our understanding of both user and affected stakeholders' expectations, enabling us to refine our policies, actions, and targets in line with ESRS requirements. Feedback from stakeholders directly influenced key areas of our strategy, including:

- **Digital Inclusion**

Insights from rural communities and local authorities reaffirmed the continued importance of bridging the digital divide. This has supported the ongoing delivery of community-focused initiatives such as the RISE Community Fund, which helps rural schools, small businesses and local community groups access digital tools and broadband-enabled opportunities.

- **Operational & Environmental Impact**

As NBI transitions to long-term operations, communities emphasised the importance of minimising disruption during maintenance activities and fibre upgrades (e.g., SCP/BCP migrations). We incorporated this feedback by adjusting scheduling, improving communication, and applying a stronger circularity lens to reduce waste and maximise reuse of network assets.

- **Supply Chain & Performance**

Feedback from suppliers and contractors helped refine procurement processes, including clearer ESG expectations, more consistent communication, fair payment terms, and enhanced health and safety standards. This builds on NBI's supplier segmentation model and supports our ambition to improve sustainability performance among high-impact suppliers.

By embedding stakeholder insights into our decision-making, we ensure our strategy aligns with stakeholder expectations, regulatory requirements, and our mission to deliver responsible, inclusive, and future-proof digital infrastructure.

Stakeholder Group	Key Interests	Engagement Methods
User Stakeholders (Broadband Providers, End Users)	Reliable, affordable internet, service quality	Annual surveys, online portals, ongoing support/compliance, environmental impact
Affected Stakeholders (Suppliers, Government, Local Communities)	Fair contracts, compliance, environmental & social impacts	Bi-annual reviews, quarterly meetings, community consultations



DMA Findings: Key Material IROs by ESRS Category

The 2025 review confirmed that the material IROs identified in 2024 remain relevant, with refinements reflecting our shift from network build to long-term operations.

Key material IROs include:

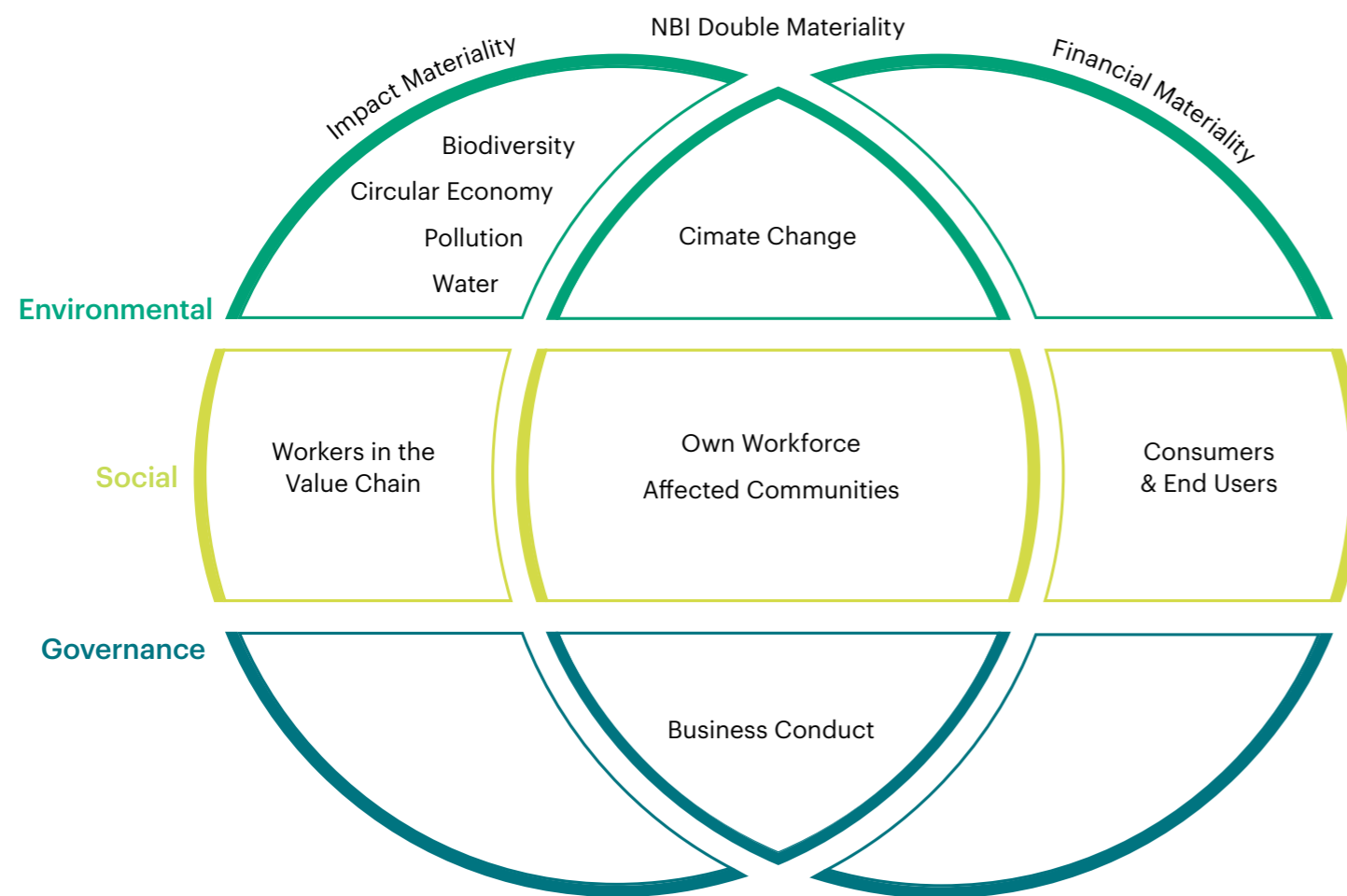
Environment (E)

Climate Change Mitigation and Adaptation

- Operational emissions and energy efficiency.
- Network resilience to climate-related hazards.
- Long-term physical and transitional climate risks.
- Resource efficiency linked to network assets.

Responsible Supply Chain Environmental Performance

- Environmental management practices of key suppliers.
- Circularity (reuse and recycling) of network infrastructure.



Social (S)

Digital Inclusion and Social Impact

- Equitable access to high-speed broadband.
- Reducing the rural digital divide.
- Supporting community participation in the digital economy.

Workforce Wellbeing and Skills Development

- Health, safety, and wellbeing of employees and contractors.
- Employee engagement and satisfaction.
- Skills development to support the shift to an operations focused organisation.

Responsible Supply Chain – Social & Human Rights

- Fair contract terms and payment practices.
- Safe working conditions for contractors and subcontractors.

Governance (G)

Data Privacy, Cybersecurity, and Service Reliability

- Protection of personal data and customer information.
- Cybersecurity governance and incident management.
- Maintaining trust through high network uptime and network performance.

Responsible Supply Chain – Governance Oversight

- Supplier accountability, ESG governance, and transparency.
- Ethical business conduct and anticorruption expectations.
- Monitoring and evaluating supplier performance.

Embedding DMA into Strategy

NBI's DMA process ensures sustainability-related impacts, risks, and opportunities are:

- Proactively identified, monitored, and reassessed through annual reviews and ongoing stakeholder engagement.
- Aligned with stakeholder expectations, including suppliers, communities, government partners, employees, and RSPs.
- Integrated into strategic planning, including operational decisions, supplier management, risk assessments, and investment cycles.

- Supported by strong governance, with oversight from the Senior Management Team, Audit and Risk Committee, and Board of Directors.

Embedding DMA outcomes into our strategic framework allows NBI to strengthen operational resilience, reinforce responsible business practices, and deliver 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: Climate Change	SDG	Material Impact	Material Risk	Material Opportunity	Value Chain Location	Time Horizons		
						Short	Medium	Long
E1-1: Climate Change Adaptation Network resilience	●	Potential Negative: Climate-related events (e.g., storms, flooding, high winds) can disrupt network performance, affecting service continuity and creating economic and community impacts.	If climate-resilient design and maintenance practices are not strengthened, extreme weather may increase repair costs, contribute to performance penalties, and cause revenue loss as climate impacts intensify. Mitigation: Implement ongoing Business Continuity & Disaster.	Enhance network resilience, uptime, and customer trust by investing in climate-resilient infrastructure, asset hardening, and redundancy. Strengthens alignment with national policy (e.g., Ireland's Climate Action Plan) and reduces long-term operational costs.	Own operations	●	●	●
E1-3: Energy Network technology efficiency	● ●	Actual Positive: NBI's fibre network is significantly more energy-efficient than legacy copper or wireless technologies, reducing operational energy intensity.	No material risk identified at present, due to existing controls, 100% renewable electricity procurement, and active monitoring of energy markets and consumption. Mitigation: Continue to procure 100% renewable electricity (via Energia), monitor energy usage, and apply optimisation measures across the network. Evaluate and adopt future energy-efficient technologies as they mature.	Energy-efficient network technologies reduce emissions, stabilise long-term energy costs, and enhance energy security. Efficiency improvements and renewable sourcing strengthen sustainability performance and operational resilience.	Own operations	●	●	●

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Social: Own Workforce	Material Impact	Material Risk	Material Opportunity	Value Chain Location	Time Horizons			
					Short	Medium	Long	
S1-1: Secure Working Conditions Employee well-being & safety	●	Potential Positive: NBI is committed to a zero-harm workplace, aligned with ISO 45001, supports physical safety, mental health and overall employee well-being.	If safety, health, or psychosocial risks are not effectively managed, injuries or reduced well-being may occur. Mitigation: Maintain ISO 45001 standards through strong leadership oversight, targeted audits, risk analytics, active reporting culture, and consistent contractor safety management. Strengthen hybrid-work governance and mental health supports. If DEI principles are not upheld or progress slows, dissatisfaction, lower engagement, attrition, and reputational harm may arise.	Strengthen safety culture through leadership engagement, continuous training, well-being initiatives, and development pathways that build a resilient, future-ready workforce.	Own operations	●		
S1-2: Equal Treatment and Opportunities for All Diversity, Equity, and Inclusion (DEI) connectivity	● ●	Actual Positive: Promoting diversity, equity, and inclusion enhances team performance, innovation, and a sense of belonging.	If DEI principles are not upheld or progress slows, dissatisfaction, lower engagement, attrition, and reputational harm may arise. Mitigation: If DEI principles are not upheld or progress slows, dissatisfaction, lower engagement, attrition, and reputational harm may arise. Apply equitable recruitment and progression processes, conduct annual pay equity reviews, deliver DEI training, and maintain clear reporting channels and participation targets for underrepresented groups.	Embed DEI across hiring, leadership, development, and culture to improve innovation, employer brand, decision quality, and talent attraction and retention.	Own		●	●
S1-3: Other Work-Related Rights Hybrid work and work-life balance	●	Actual Positive: Flexible and hybrid working arrangements support well-being, safety, and improved work-life balance.	If communication, clarity, workload balance, or remote-work supports are insufficient, morale, productivity, and engagement may decline. Mitigation: If communication, clarity, workload balance, or remote-work supports are insufficient, morale, productivity, and engagement may decline. Provide structured hybrid-work guidelines, manager training, regular engagement checks, clear communication, and accessible well-being resources.	Modern, flexible working models enhance engagement, retention, productivity, and overall employee satisfaction.	Own	●	●	
Social: Affected Communities	Material Impact	Material Risk	Material Opportunity	Value Chain Location	Time Horizons			
					Short	Medium	Long	
S3-1: Communities' Economic, Social and Cultural Rights Broadband access & community connectivity	● ●	Potential Positive: Expanding reliable broadband access for underserved areas enables digital inclusion, improved access to public services, and local economic development.	If socio-economic gaps persist, digital exclusion may limit equitable access to services, opportunities, and community participation. Mitigation: If socio-economic gaps persist, digital exclusion may limit equitable access to services, opportunities, and community participation. Prioritise underserved areas in planning, engage directly with communities, and deliver initiatives that support affordability, accessibility, and digital-skills development.	Use digital connectivity to empower communities by enabling education, remote work, tele-services, entrepreneurship, and sustainable local economic growth.			●	●

Governance: Business Conduct		Material Impact	Material Risk	Material Opportunity	Value Chain Location	Time Horizons		
						Short	Medium	Long
G-1: Corporate Culture Ethics	●	Actual Positive: A strong culture of ethics, accountability, and transparency supports responsible decision-making and organisational resilience.	If corporate culture weakens, cultural drift, disengagement, and increased ethical breaches may occur. Mitigation: Deliver regular Code of Conduct training, reinforce speak-up mechanisms, and ensure consistent, transparent leadership communication across the organisation.	Strengthen organisational trust and reputation by fostering an open, values-driven culture through ongoing ethics training, transparent communication, and recognition of ethical behaviours.	Own Operations		●	●
G1-1: Service Reliability Data governance and cybersecurity	●	Actual Positive: Strong data protection, cybersecurity controls, and resilience measures safeguard personal data, maintain service reliability, and protect stakeholder trust.	If data-governance or cybersecurity controls fail, data breaches, service outages, regulatory penalties (e.g., GDPR, NIS2), and reputational harm may occur. Mitigation: Maintain robust security controls, incident-response capabilities, resilience and penetration testing, and enforce vendor security requirements across the supply chain.	Enhanced cybersecurity, data governance, and business continuity improve network performance, protect customer data, strengthen regulatory compliance, and differentiate NBI as a reliable and trusted wholesale provider.	Own Operations	●	●	
G1-5: Supplier Relationships Responsible procurement	● ●	Potential Positive: Fair, transparent supplier management strengthens supply chain resilience and supports responsible business practices.	If supplier due diligence is weak or relationships deteriorate, disruptions, compliance gaps, and labour/human-rights risks may increase. Mitigation: Apply risk-based supplier engagement, proportionate ESG expectations, contractual requirements, performance monitoring, and diversification to reduce dependency risks.	Embed ESG criteria, transparent selection, fair terms, and P1-P4 segmentation to drive supply chain resilience, ethical performance, and long-term value creation.	Upstream		●	●

IROs Interaction with Strategy and Business Model

Aligned with our purpose and guiding principles, our ESG strategy enables us to proactively manage impacts, risks and opportunities (IROs) arising from our operations and evolving stakeholders' expectations. This approach supports long-term resilience and aligns with ESRS requirements. Our strategy continues to be delivered across the following pillars:

1. Partnering with sustainable investors and stakeholders who share our values, support long-term resilience, and encourage responsible governance.
 2. Ensuring business resilience to climate change, aligned with our pathway to Net-Zero by 2050 and supported by climate risk assessments and adaptation planning.
 3. Embedding responsible practices across design, build, operations, supply chain, and service delivery, ensuring our partners uphold strong environmental, social, and governance standards.
 4. Developing innovative, sustainable solutions and identifying new opportunities that enhance digital inclusion and operational efficiency.
 5. Maintaining continuous ESG monitoring, evaluation and reporting, creating a feedback loop that drives transparent, measurable improvement.
- Understanding the interdependencies between impacts, risks, and opportunities (IROs) strengthens strategic decision-making. For example:
- Climate related risks and supply chain vulnerabilities interact, influencing infrastructure resilience, supplier reliability, and operational continuity.

- Cybersecurity risks and service reliability now shape decisions across network assurance, resilience planning, and investment cycles.
- Circularity, resource efficiency, and cost control increasingly overlap as NBI prepares for long-term network refresh cycles.

By integrating IROs into strategic planning, we ensure that sustainability considerations are embedded into operational decisions, capital planning, and long-term investment strategies.

Proactively addressing these IROs strengthens the resilience and reliability of our services. Our decarbonisation strategy, aligned with Ireland’s Climate Action Plan, mitigates regulatory and transition risks while supporting long-term cost efficiency. Climate risk assessments inform infrastructure adaptation measures to maintain service continuity during extreme weather events. Strengthened cybersecurity and data governance reduce operational and financial risks and maintain trust with our wholesale partners and end users.

This holistic approach ensures we continue to manage risk, leverage opportunities, and create shared value for NBI and society. By integrating IROs into our business model, we contribute to the ambitions of the EU Green Deal—accelerating the green transition, promoting climate resilience, and supporting a fair, inclusive digital economy.

Managing IROs Across NBI’s Value Chain

NBI integrates sustainability into each stage of its operations to mitigate risks, reduce environmental and social impacts, and create long-term value. This integration ensures alignment with stakeholders and delivers a cohesive approach across the organisation.

By embedding sustainability into every stage of the value chain, NBI reduces its carbon footprint, manages resources responsibly, and promotes energy efficiency while ensuring reliable 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: Environmental impacts, land disturbance, or regulatory non-compliance.

Management: Environmental assessments, climate-resilient route planning, and prioritisation of energy-efficient, low-impact designs.

Procurement

Risk: Supplier related emissions, ESG performance gaps, and material sourcing risks.

Management: ESG due diligence, audits, monitoring circularity principles and human rights standards of supplier processes

Deployment

Risk: Carbon impacts, worker safety concerns, and labour condition risks.

Management: Strong HSQE governance, ethical labour standards, and contractor oversight; maximising reuse of assets (where appropriate and available) and applying circular economy principles.



Downstream: Sustainable Broadband Access

Wholesale Broadband Access

Risk: Digital inequality and service reliability challenges impacting rural underserved areas.

Management: Ensuring universal coverage, enhancing network resilience, and supporting digital inclusion through community initiatives across the Intervention Area (IA).

Service Provision

Risk: Indirect environmental impacts associated with increased digital usage.

Management: Broadband enables remote work, reducing commuting-related emissions and supporting sustainable behaviour change; continuous optimisation of network efficiency.

Network Operations

Risk: Operational inefficiencies, rising energy demands, or asset degradation due to severe weather events.

Management: Investing in renewable energy, network optimisation, predictive maintenance and energy-efficient technologies to extend asset life.

Network Assurance

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

Management: Continuous monitoring, cybersecurity controls, resilience planning, and proactive maintenance to deliver reliable, secure service.

Impacts, Risks & Opportunities (IROs)

IRO Type

Impact materiality

- ⊕ Positive
- ⊖ Negative

Financial materiality

- ⬆️ Opportunity
- ⬇️ Risk

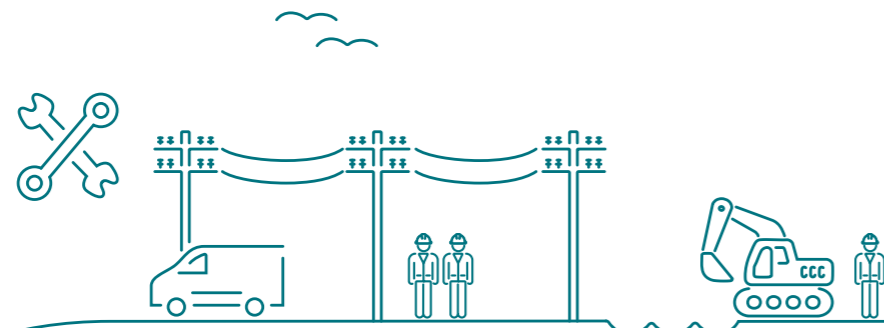


Upstream

- ⊖ Scope 3 GHG emissions
- ⬇️ Supply chain disruptions
- ⬆️ ⊕ Supplier ESG Performance
- ⬆️ ⊕ Resource Efficiency

Entire Value Chain

- ⬆️ ⊕ Sustainable rural development



Own operations

- ⬇️ ⊖ Scope 1 GHG emissions
- ⬇️ Transition risks
- ⬆️ ⊕ Network design and operations
- ⬆️ ⊕ Energy efficiency
- ⬇️ ⊖ Severe storm-related service disruption
- ⬆️ ⊕ Working conditions
- ⬆️ ⊕ DEI
- ⬆️ ⊕ Cybersecurity & Data Governance

Downstream

- ⬇️ ⊖ Scope 3 GHG emissions
- ⬆️ ⊕ Driving connectivity
- ⬆️ ⊕ Wholesale broadband service provision improves quality of life
- ⬆️ ⊕ Hybrid-work reduces commuting emissions and increases work-life balance
- ⬆️ ⊕ Subcontractor Circularity Practices



Continuous Monitoring and Review

Through our annual DMA review and ongoing engagement with internal and external stakeholders, we ensure our ESG efforts reflect the evolving operational, regulatory, and societal context in which we operate.

This process includes regular reviews of climate risks, supply chain performance, data governance developments, and stakeholder feedback - ensuring that NBI's strategy remains responsive and resilient. By maintaining this cycle of continuous improvement, we strengthen our ability to anticipate emerging risks, identify new opportunities, and build long-term value for our stakeholders.

Our commitment to ongoing review and refinement supports alignment with global sustainability objectives and reinforces our contribution to a fair, climate resilient, and inclusive digital future. With this foundation in place, we now turn to how NBI's sustainability efforts contribute to the United Nations Sustainable Development Goals (SDGs).

ALIGNMENT WITH THE UN SDGs

As we advance our environmental, social, and governance (ESG) agenda, we recognise the importance of aligning our actions with global sustainability frameworks. In addition to meeting national obligations, NBI supports the United Nations Sustainable Development Goals (SDGs)—a shared blueprint for building a more sustainable, inclusive and resilient world.

Our SDG alignment ensures that NBI's impacts extend beyond our organisational boundaries and contribute to wider social and environmental progress. The SDGs most relevant to our operations and material impacts include:

SDGs	NBI's Contribution
5: Gender Equality	Promote equal opportunities, fair pay, and inclusive leadership across our workforce.
8: Decent Work & Economic Growth	Support quality employment, fair labour standards, and employee well-being within NBI and our supply chain.
9: Industry, Innovation & Infrastructure	Design, deploy and deliver high-quality broadband infrastructure to underserved communities and enable rural digital participation.
13: Climate Action	Implement a science aligned decarbonisation strategy, reduce operational emissions, and strengthen climate adaptation and network resilience.



KEY ESG COMMITMENTS & GOALS

To further our commitment to sustainability, we have set key ESG goals that align with our internal priorities, our regulatory obligations, and the broader global sustainability agenda. These goals reflect our dedication to delivering measurable,

positive impacts across the supply chain, our operations, and the communities we serve. By aligning our efforts with the UN SDGs, we ensure our actions contribute to a more inclusive, resilient, and low-carbon future. Our key ESG commitment and goals include:

LEGEND FOR SUSTAINABLE DEVELOPMENT GOALS (SDGs):



	Commitment	ESG Goals	Contributing to UN SDGs
Environmental	Act on climate change by being Carbon Neutral by 2035 .	Be Carbon Neutral for our direct operations by 2035.	●
	Become a Net-Zero business by 2050 .	We pledge to becoming a Net-Zero business ahead of 2050. Maintain ISO 50001 (Energy Management) certification.	●
Social	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.	●
	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.	●
	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, lasting change requires continuous effort, innovation, and collaboration. NBI remains committed to refining our sustainability strategy each year, integrating new insights from our Double Materiality Assessment (DMA), regulatory developments, and evolving stakeholder expectations.

As part of this commitment, we uphold transparency and accountability in how we measure, monitor and report ESG performance, ensuring our actions remain broadly aligned with ESRS expectations and reflect the realities of an operational wholesale broadband network.



TRACKING OUR PROGRESS

As we continue to enhance broadband availability and service quality, we are also deepening our focus on environmental responsibility, social impact, and strong governance. Our impact extends far beyond connectivity—contributing to education access, economic development, rural inclusion, and community resilience.

At NBI, ESG is fully embedded into our operations. Guided by our DMA findings, we prioritise environmental responsibility, social impact, and corporate governance to drive meaningful, measurable change. Through collaboration, innovation, and responsible practices, we are shaping a more resilient and equitable digital future.

Environmental

We address key environmental challenges through actions aligned with our DMA, including climate mitigation, adaptation planning, and circularity. This work supports Ireland's Climate Action Plan, EU climate policy, and our long-term transition to a low carbon, climate-resilient network.

Our Environmental focus areas are:

- Carbon Neutrality in Direct Operations (Scope 1 & 2) by 2035.
- Net-Zero by 2050.
- Climate Resilience & Risk Management.
- Resource Efficiency Across The Value Chain.

Social

Our DMA reaffirms the importance of a safe, inclusive, and engaged workforce; meaningful community engagement; and promoting digital inclusion nationwide. We continue to invest in initiatives that support communities, enable remote work and digital participation, and prioritise employee well being.

Our Social focus areas are:

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

Governance

Strong governance underpins every aspect of our ESG strategy. We uphold high standards of ethics, transparency, and compliance. Our governance structures ensure ESG is embedded into decision-making, risk management, and strategic planning, with clear oversight from senior leadership and the Board.

Our Governance focus areas are:

- Risk Management.
- Cybersecurity & Data Protection.
- Ethical Business Conduct & Compliance.

Key ESG Achievements in 2025:



451,433
homes passed with
broadband infrastructure



164,708
homes connected to
high-speed broadband



24 nationalities
represented in our
diverse workforce



1,746,772 kWh
of renewable electricity
consumed, reinforcing our
clean energy commitment

Our ESG roadmap is structured across time horizons to manage risk, allocate resources and track progress toward our Carbon Neutral and Net-Zero goals:

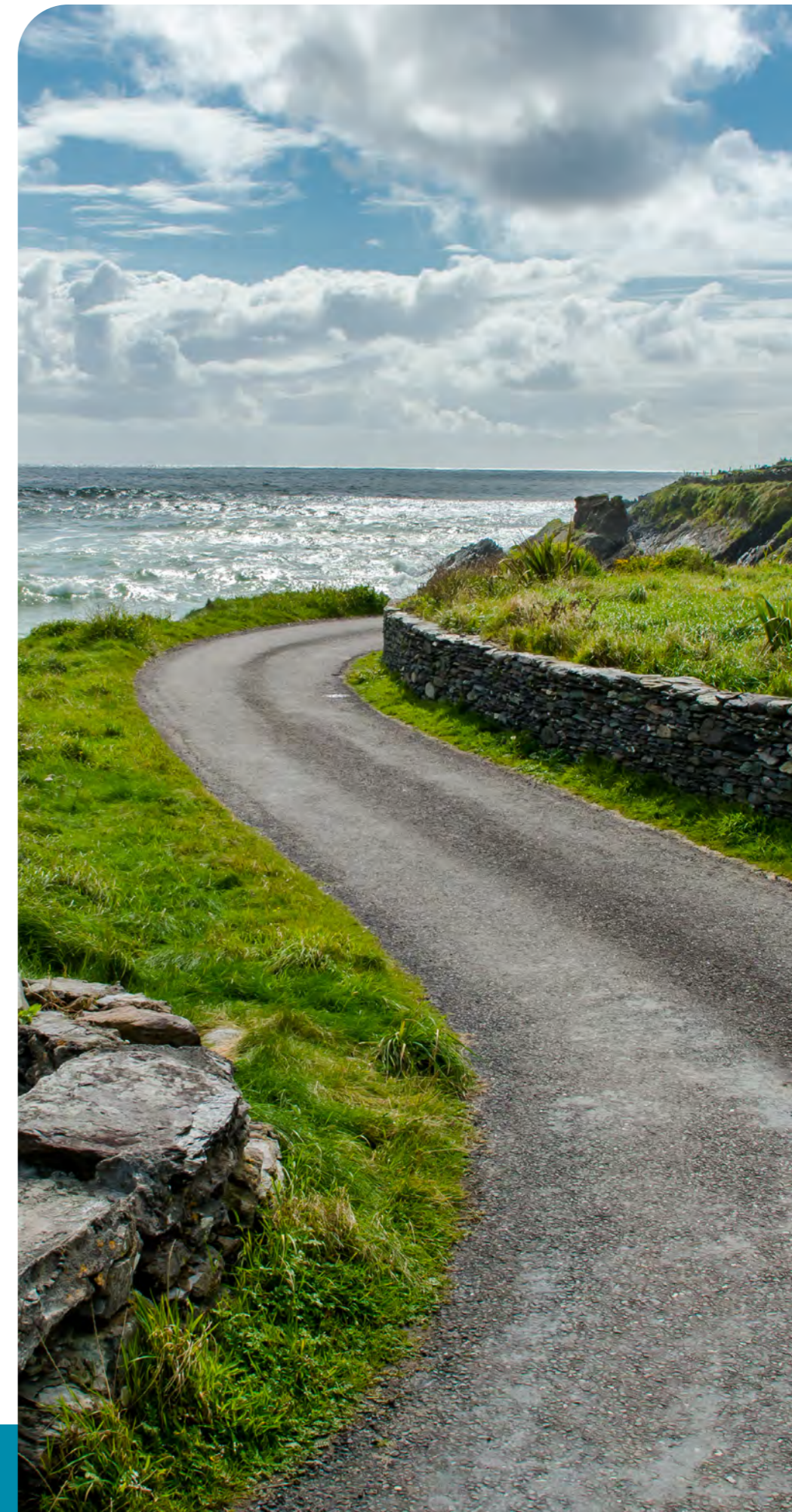
- **Short-term (0-2 years)**
Supports annual reporting and operational planning.
- **Medium-term (3-5 years)**
Aligns with strategic goals, including resilience, energy optimisation, and supplier engagement.
- **Long-term (More than 5 years)**
Focuses on decarbonisation, circularity, and network transformation to meet NetZero by 2050. By integrating sustainability into decision-making and setting clear milestones, including Carbon Neutrality in direct operations by 2035, and Net-Zero by 2050, we reinforce accountability and ensure long-term consistency. 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 the integration of ESG into corporate governance and risk management.

This includes embedding IROs into enterprise risk processes, reviewing progress, and providing direction on evolving ESG priorities. The Board of Directors formally approves material IRO disclosures, reinforcing transparency and accountability.

This governance framework aligns our approach with the Corporate Sustainability Reporting Directive (CSRD) and supports full compliance with the European Sustainability Reporting Standards (ESRS).



Scope of Disclosures

NBI reports in broad alignment against the European Sustainability Reporting Standards (ESRS) framework, to ensure clarity, comparability, and transparency.

We disclose performance across key ESRS topical standards:

E1 **Climate Change** under 'Our Environmental Commitment' addressing climate-related impacts, risks, and adaptation actions.

S1 **Own Workforce** under 'Our Social Commitment - Our People, covering employee well-being, diversity, and fair working conditions.

S3 **Affected Communities** under 'Our Social Commitment - Our Impact' reflecting our engagement and impact on local communities.

G1 **Business Conduct** under 'Our Commitment to Responsible Business Conduct' ensuring ethical governance, compliance, and anti-corruption 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 Neutrality in Direct Operations by 2035



Net-Zero: Targeted by 2050



Scope 1: 247 tCO₂e



Scope 2: 0 tCO₂e
by continuing to procure 100% green electricity, maintained for all sites

443 tCO₂e emissions avoided (from procuring renewable electricity instead of fossil fuel-based power to supply our offices and sites across rural Ireland)

100% Renewable energy achieved for all NBI sites, including Office and Equipment Accommodation Modules (EAMs) - the small buildings that house our telecommunications equipment.



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

48 Fleet cars in 2025



CLIMATE STRATEGY

NBI is committed to reducing our environmental impact while enabling a resilient, futureproof national fibre network. In 2025, we refined our climate approach by further developing our decarbonisation pathway and improving the accuracy of emissions data, building on the longstanding integration of environmental considerations across operations and the supply chain.

To support a climate strategy that is grounded in operational delivery, NBI identifies and assesses material climate-related impacts, risks, and opportunities (IROs) to inform decision-making and prioritise actions aligned with emissions reduction objectives.

In 2025, NBI embedded climate considerations further into governance and operational practices. Our climate strategy focuses on:

- 1. Accurate Measurement & Reduction:** Improved emissions modelling across all scopes, refined activity-based data, and enhanced supplier reporting expectations.
- 2. Energy Efficiency & Renewable Procurement:** Continued 100% renewable electricity across all sites, ongoing optimisation of network energy consumption, and implementation of energy management improvements under ISO 50001.
- 3. Supplier & Value Chain Engagement:** Expanded ESG expectations for strategic suppliers, segmentation (P1–P4), and early engagement to improve Scope 3 data quality.
- 4. Climate Resilience & Adaptation:** Enhanced climate risk mapping and scenario analysis, informing updates to our Climate Adaptation Plan.

MATERIAL CLIMATE-RELATED IMPACTS, RISKS & OPPORTUNITIES

Note: E1 – Climate Change (as outlined 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.

In 2025, NBI updated its double materiality assessment to reflect new climate data, evolving regulation, and better insights into supplier-related emissions.

Material Impact:

- Fibre’s lower energy intensity reduces Ireland’s long-term telecoms emissions.
- Construction-phase impacts remain significant, particularly civil works, logistics, and materials.



Material Risk:

- Increased frequency of storms affecting overhead lines, impacting continuity and repair costs.
- Supplier emissions transparency gaps affecting Scope 3 reliability.

Material Opportunity:

- Energy-efficient fibre replacing legacy copper / wireless technology.
- Potential emissions reductions through improved data and supplier engagement.
- Enhanced resilience contributes to national digital security.

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
<p>E1-1: Climate Change Adaptation</p> <p>Network Resilience</p>	<p>Potential Negative: Climate-related events (e.g., storms, flooding, high winds) can disrupt network performance, affecting service continuity and creating economic and community impacts.</p>	<p>If climate-resilient design and maintenance practices are not strengthened, extreme weather may increase repair costs, contribute to performance penalties, and cause revenue loss as climate impacts intensify.</p> <p>Mitigation: Implement ongoing Business Continuity & Disaster Recovery (BC/DR), conduct climate-risk mapping, and deliver a Climate Adaptation Plan informed by severe weather trends (2023–2025). Integrate resilience measures such as vegetation management and route diversification.</p>	<p>Enhance network resilience, uptime, and customer trust by investing in climate-resilient infrastructure, asset hardening, and redundancy. Strengthens alignment with national policy (e.g., Ireland’s Climate Action Plan) and reduces long-term operational costs.</p>
<p>E1-3: Energy</p> <p>Network technology efficiency</p>	<p>Actual Positive: NBI’s fibre network is significantly more energy-efficient than legacy copper or wireless technologies, reducing operational energy intensity.</p>	<p>No material risk identified at present, due to existing controls, 100% renewable electricity procurement, and active monitoring of energy markets and consumption.</p> <p>Mitigation: Continue to procure 100% renewable electricity (via Energia), monitor energy usage, and apply optimisation measures across the network. Evaluate and adopt future energy-efficient technologies as they mature.</p>	<p>Energy-efficient network technologies reduce emissions, stabilise long-term energy costs, and enhance energy security. Efficiency improvements and renewable sourcing strengthen sustainability performance and operational resilience.</p>



ESG POLICY

We are committed to operating in a sustainable and responsible manner. Our ESG Policy provides a structured framework to guide decision-making and operational practices across the organisation. 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 2035 and targeting 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, equity and inclusion, and upholding the highest standards of ethics and governance.

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): Leveraging Hydrotreated Vegetable Oil (HVO) as a renewable fuel alternative to reduce fleet emissions, supporting decarbonisation across rural Ireland where low-carbon infrastructure is limited.
- Scope 2 (Electricity Consumption): Maintained 100% renewable electricity for all sites since 2023.
- Scope 3 (Supply Chain): Strengthening supplier expectations through Supplier Code of Conduct, outlining increased reporting expectations on emissions tracking and sustainable procurement.

Energy Efficiency & Operational Sustainability

- Ongoing optimisation of network equipment and operational sites through monitoring and performance management.
- ISO 14001 & 50001 certifications reinforce best-in-class environmental management.

Promoting Circularity

- Increased reuse of network components where appropriate, in line with technical, safety, and performance standards.

TARGETS & PERFORMANCE

Our Roadmap to 2050

Goal	Target Year	Status
100% Renewable Electricity	Ongoing	Maintaining
ISO 9001, 14001/50001 & 45001 Compliance	Ongoing	Maintaining
Carbon Neutral Operations	2035	On Track
Net-Zero	2050	Pathway approved

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 performance, inform decision-making, and drive continuous improvement.

*Under the Greenhouse Gas Protocol Corporate Standard, location-based emissions reflect the average emissions intensity of the electricity grid in each 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 tCO₂e. Location-based Scope 2 emissions were 492 tCO₂e in 2025, with the year-on-year increase reflecting the expansion in the number of sites hosting the National Broadband Network and the associated growth in electricity consumption required to support network operations.



Scope 1 Emissions (Fleet)

247 tCO₂e



Total Electricity Purchased

1,746,772 kWh



Scope 2 Emissions (Location-Based*)

492 tCO₂e



Scope 2 Emissions (Market-Based Green Electricity*)

0 tCO₂e



Scope 3 Emissions (Spend-Based)

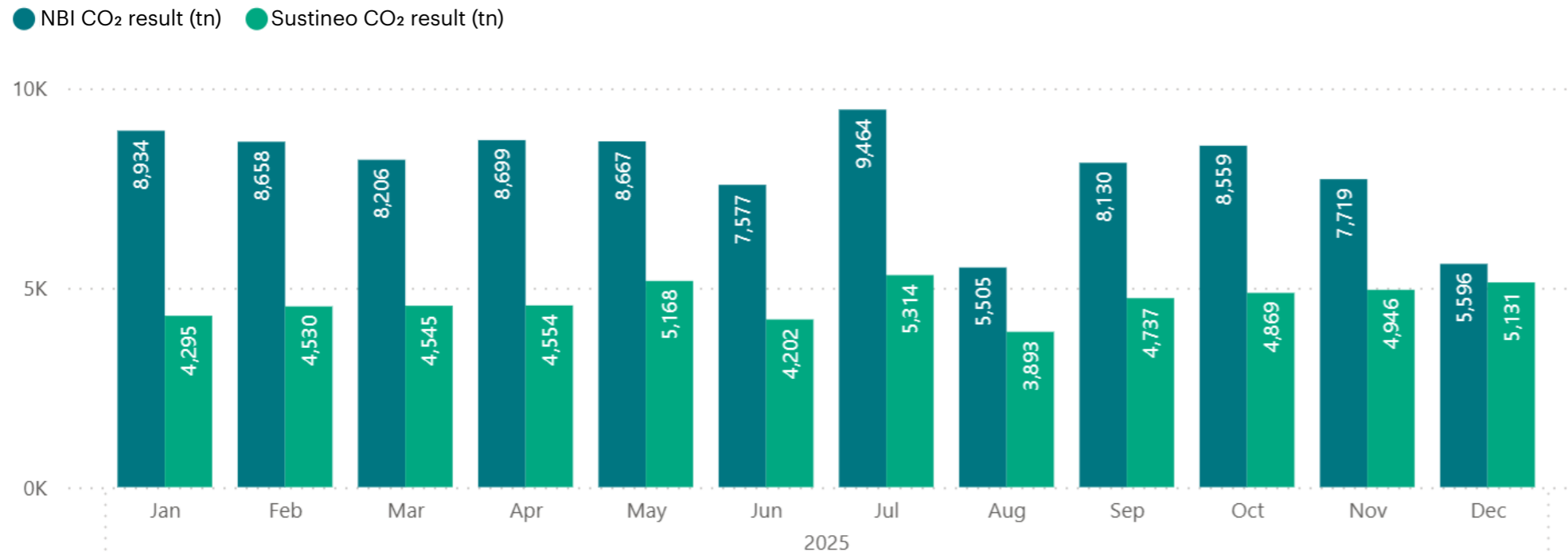
56,185 tCO₂e

Note: The 2024 Scope 3 emissions figure was previously reported as 96,967 tCO₂e. During 2025, we engaged external carbon consultants, Sutineo, to rebaseline our 2024 carbon footprint and validate underlying assumptions. The Scope 3 estimate has since been refined using improved data sources, updated methodologies, and enhanced supplier engagement, resulting in an updated 2024 Scope 3 emissions figure of 54,814 tCO₂e. The 2025 Scope 3 emissions, calculated using a spend-based methodology, are reported as 56,185 tCO₂e. This slight increase reflects the final stages of major network build procurement, during which the majority of material and equipment purchasing is being completed. As NBI transitions out of this capital-intensive phase, we expect Scope 3 emissions to decline in future years, consistent with reduced construction-related procurement. Key updates include:

- **Updated Emission Factors:** 2024/25 emission factors were applied in place of 2022/23 factors, improving the accuracy of carbon intensity across spend categories.
- **Refined Methodology:** Telecom-specific datasets were used in place of generic averages, resulting in a more representative Scope 3 footprint.
- **Improved Spend Mapping:** Reclassification of spend categories led to more accurate emissions allocation.
- **Supplier Engagement:** In line with our Procurement ESG Strategy, 65% of high-impact suppliers provided activity-based emissions data, strengthening data quality.
- **Material Emissions Assessment:** Products and materials account for approximately 80% of Scope 3 emissions. Emissions were estimated by analysing the top 24 of 170 items, representing nearly 80% of material spend, and extrapolating across remaining materials.

This baseline reflects an expected evolution in data maturity and improves the credibility of our emissions baseline, supporting more informed and effective decarbonisation planning.

CO₂ Emissions by Scope Group & Category



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.

Climate Adaptation and Resilience

As climate risks intensify, safeguarding the resilience of NBI's national fibre network is central to our environmental responsibilities. Extreme weather, flooding, and prolonged power outages pose increasing risks to infrastructure and service continuity. In 2025, NBI strengthened its climate adaptation capability through geospatial intelligence, automation, operational efficiency, and clear governance oversight.

Enhancing Climate Resilience through Geospatial Intelligence

To better anticipate and manage the physical impacts of climate change, NBI leverages ArcGIS geospatial systems across planning, operations, and incident response. This digital-twin approach brings together live weather data, environmental constraints, and network information to support evidence-based decisions enabling NBI to:

- Map storm activity and severe-weather projections.
- Screen flood and erosion risks for our Equipment Accommodation Modules (EAMs) - the small buildings that house our telecommunications equipment.
- Integrate biodiversity and environmental-sensitivity layers.
- Analyse vegetation risks to plan preventative tree-trimming.
- Support compliance, audit and contractor oversight through field-survey apps.

These capabilities improve safe-access decisions, prioritise high-risk sites, reduce unnecessary dispatches, and ultimately strengthen network resilience while helping avoid emissions.

Environmental Performance & Climate Risk Management

NBI embeds climate-risk considerations into network design, operations, and long-term planning to ensure resilience and regulatory compliance. Key components include:

- Vulnerability assessments to identify climate-sensitive assets.
- Engagement with internal and external stakeholders.
- Alignment with Irish and EU environmental-related legislation.
- Use of climate projections to assess exposure to future hazards.
- Double materiality analysis covering impacts to people, the local environment, and NBI's financial resilience.

Geospatial Intelligence in Practice

ArcGIS integrates environmental, operational, and climate data into a single decision-support platform. Key applications include:

1. **Climate Risk & Extreme Weather Preparedness**
Real-time and historical storm and flood layers inform route redesign, emergency response, and vegetation management, incorporating learnings from events such as Storm Darragh and Storm Eowyn.
2. **Biodiversity & Environmental Sensitivity Mapping**
Geospatial layers for Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Natural Heritage Areas (NHAs)—along with ecological corridors, invasive species data, and Local Authority environmental datasets—support Appropriate Assessment (AA) screening and environmentally responsible routing.

3. Vegetation & Land Management

Light Detection and Ranging LiDAR-based drive-through surveys (carried out by Korec) use laser scanning to map tree canopies and cable clearances. This allows NBI to identify where targeted trimming is needed, align works with ecological windows, and reduce storm-related risks.

4. Compliance, Audit & Contractor Oversight

Dashboards track environmental controls and integrate subcontractor evidence.

5. Supporting CSRD Reporting

Spatial analytics enhance physical climate-risk assessments and demonstrate environmentally responsible network deployment across 96% of Ireland's landmass.

The integration of geospatial intelligence is a core enabler of NBI's sustainability strategy - reducing environmental impacts, improving resilience and supporting efficient, responsible network operations.

Storm Management, Automation & Digital Operations

In response to recent severe storms (e.g., Storm Eowyn), NBI introduced a new AWS-based automation suite designed and delivered by our Operations and Digital teams through Project Émilie, a cross-functional initiative focused on improving storm response and network resilience.

First tested during Storm Bram, the system proved its value immediately: teams were able to identify faults faster, reduce unnecessary travel, and significantly shorten time-to-fix during a period of exceptionally high network activity. The automation suite:

- Interprets incoming network alarms and groups related incidents.

- Retrieves geospatial context to highlight likely fault locations.
- Automatically creates JIRA tickets — the workflow and task-tracking records used to assign work and prioritise fixes.
- Sends targeted notifications to internal teams and Broadband Providers.
- Syncs real-time updates from field technicians' tablets to central systems.

These automations eliminate duplicate site visits, reduce manual bottlenecks, and improve Mean Time to Restore (MTTR), especially during large weather events. The improvements observed during Storm Bram demonstrated that, in real operational conditions, the system delivers measurable efficiency gains and faster resolutions for customers.

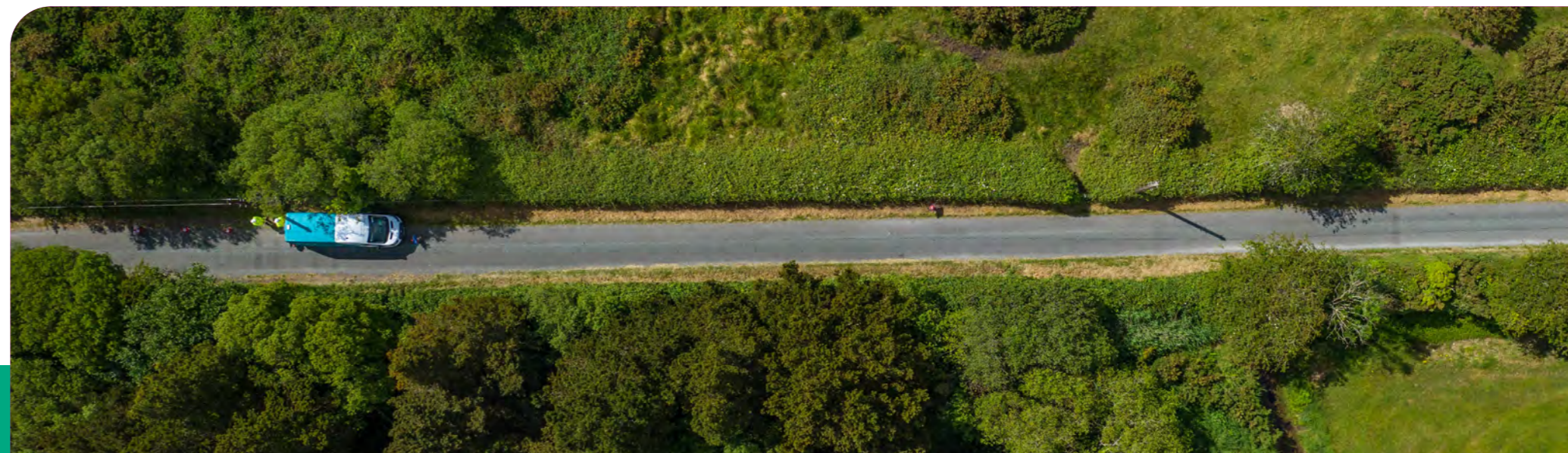
Operational Efficiency as a Climate Adaptation Tool

Improving how we work directly strengthens NBI's climate resilience — by cutting unnecessary travel, speeding up repairs, and protecting the stability of the network during severe weather. Key steps taken in 2024–2025 include:

- First-Time-Right checks: Better field quality checks reduce repeat visits, saving fuel, time, and emissions.

- Process automation:
 - One-click scripts for Open Eir pole-replacement requests.
 - Streamlined fault-management workflows that remove manual steps.
 - Data analytics: Identifies recurring delays and patterns that previously caused excess travel and slower fixes.
 - Tree-trimming programme: Targeted preventative maintenance along high-risk routes to reduce storm-related outages.
 - Emergency power support: Rapid deployment of generators (within eight hours) to keep customers connected during prolonged outages.

These actions strengthen NBI's climate adaptation by reducing exposure to storm-related risks, improving response times, and lowering emissions from fleet operations—providing a strong foundation for our wider climate risk management and resilience measures.



Climate Risk Management & Resilience Measures

NBI's adaptation programme addresses both acute climate risks (storms, flooding) and chronic risks (changing weather patterns). Key measures include:

- Real-time weather tracking and early-warning triggers.
- Floodplain screening and enhanced battery and cabinet telemetry, which provides live monitoring of power levels, temperature, and equipment health to prevent outages before they occur.
- Diversified backhaul routes to reduce single points of failure across the network.
- Strengthened Business Continuity and Disaster Recovery (BC/DR) protocols, supported by incident reviews and readiness exercises.
- Exploration of additional redundancy solutions, such as satellite-based emergency connectivity (e.g., dark fibre to Starlink).

Together, these actions form a resilient operational baseline, enabling NBI to integrate climate adaptation more deeply into our broader environmental stewardship approach.

Integrated Adaptation & Environmental Stewardship

By combining geospatial intelligence, automation, preventative maintenance, and structured governance, NBI's climate-adaptation programme strengthens network resilience while contributing to our environmental commitments. These measures safeguard rural connectivity, reduce emissions from operational activities, and ensure continuity of service as Ireland experiences more extreme weather.

While adaptation remains essential to protect service continuity and manage physical climate risks, NBI also recognises the importance of reducing our broader environmental footprint. Our decarbonisation strategy focuses on driving emissions reductions across our operations and wider value chain.

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. Targeting 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

Effective climate governance is essential to achieving NBI's environmental objectives, ensuring the organisation can both reduce emissions and remain resilient to increasing climate-related risks. Oversight, accountability, and operational readiness are embedded across NBI's structure, supported by clear decision-making pathways and strong alignment with shareholder expectations.

Board and Committee Oversight

The **Audit & Risk Committee (ARC)** holds formal responsibility for monitoring climate related risks, reviewing environmental performance, and assessing progress against our climate targets. The ARC receives quarterly updates on climate incidents, resilience measures, and adaptation actions, ensuring climate considerations remain integral to NBI's broader risk management framework.

Cross Functional Leadership and Operational Ownership

NBI's climate governance model is strengthened by clear cross-functional ownership and integrated operational processes that enable consistent delivery against our sustainability objectives.

Innovation Forum & Project Émilie:

The Innovation Forum brings together teams from across the business to identify opportunities to improve efficiency, resilience, and environmental performance. These ideas are then progressed through Project Émilie—NBI's digital automation and process-improvement programme—which develops scalable solutions that reduce manual effort, enhance data quality, and support decarbonisation.

To ensure transparency and effective oversight, all Project Émilie initiatives are tracked through JIRA, NBI's enterprise workflow and project-management tool. Monthly JIRA reporting provides end-to-end traceability, highlighting progress, risks, and measurable environmental and operational impacts.

This structure ensures that climate action is not confined to sustainability teams but embedded across the organisation, with clear roles and accountability.

Resilience & Incident Management

During climate-related events, the Major Incident Management Group is activated to coordinate rapid, cross-functional responses. This group integrates real-time geospatial intelligence, automated workflows, and cross-team collaboration to protect service continuity during severe weather, supporting both customer connectivity and national digital resilience.

Green Team & Employee Engagement

The Green Team, a cross-business group of environmental champions, supports operational delivery of climate initiatives, employee engagement, ISO requirements, and continuous improvement. Their work ensures sustainability considerations are embedded throughout NBI's culture.

Shareholder Alignment

NBI's climate governance approach is aligned with the expectations of our majority shareholder, Asterion, whose sustainability principles emphasise long-term value creation, emissions reduction, governance transparency, and resilience. This alignment supports strategic oversight and anchors NBI's environmental commitments within broader corporate objectives.

Integrated Governance for Environmental Performance

Through this multi-layered governance structure - Board oversight, SMT leadership, operational ownership, innovation mechanisms, and engagement across the organisation - NBI ensures that climate action is strategic, coordinated, and that there is accountability. This approach strengthens our ability to deliver on environmental commitments, enhance network resilience, and support national climate objectives.

Our Social Commitment

 299
Staff

 ISO 45001
Certified

 24
Different nationalities

6,803 
Training hours; An average
of 23 hours per employee



OUR PEOPLE

At NBI, our people are central to the success of the National Broadband Plan and the delivery of one of Ireland's most significant national infrastructure programmes. We remain committed to fostering a workplace culture that supports inclusion, well-being, professional development, and social impact. Our workforce strategy prioritises ESG integration, wellness, diversity and inclusion, internal communication, and meaningful recognition—ensuring our employees are supported, valued, and empowered to grow.

In 2025, NBI employed 299 people representing 24 nationalities, reflecting the diverse and inclusive environment we continue to build. Together, our teams recorded 6,803 training hours, averaging 23 hours per employee, demonstrating our sustained investment in capability building, leadership, and professional development. As an organisation certified to ISO 45001, we uphold world-class health and safety standards while fostering a culture where well-being, respect, and collaboration define how we work.

Our people are the foundation of our mission to connect communities across Ireland. NBI's commitment to diversity, well-being, and equal opportunity is embedded in how we operate and is reflected in the composition and performance of our workforce. Through these social commitments, we ensure our operations align with our values and sustainability goals—creating a workplace where our people can thrive and contribute to meaningful national impact.

- **299 employees from 24 nationalities:** reinforcing our multicultural environment.
- **Gender Diversity:** Increased from 26% to 32% women across the workforce, with 42% in senior leadership roles.

- **Board Representation:** 42% female Board representation, contributing to balanced governance and inclusive decision-making.
- **Equity & Inclusion:** Annual pay equity analysis ensures fairness and transparency in compensation and career progression.
- **Internal Mobility:** 37% of roles were filled internally, supporting mobility, progression, and retention.

OUR CULTURE

We foster a workplace that prioritises individual development, well-being, and a genuine sense of purpose. Our commitment to responsible business practices, including how we manage our environmental and social impact, is reflected in the everyday decisions our people make. We focus on practical action and accountability, ensuring employees are meaningfully involved in shaping improvements across the organisation.

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 set aside, and empowerment remains at the heart of everything we do.

Our values guide how we operate and define what we stand for. They help us bring our vision to life, keep us focused on our mission and ensure we achieve our shared goals.

In 2025, NBI refreshed its corporate values - Integrity, Initiative, Teamwork and Excellence - to better reflect the organisation we are becoming as we transition from network deployment to long-term operations.

These values are now central to how we work:

- **Integrity:** We act transparently and responsibly, doing the right thing even when no one is watching.
- **Initiative:** We proactively solve problems, embrace challenges, and continuously improve how we work.
- **Teamwork:** We collaborate for collective success, recognising that every role contributes to delivering and operating a high-quality national network.
- **Excellence:** We are committed to delivering high-quality outcomes for colleagues, customers, and communities, every time.

As we complete the deployment phase and evolve into a long-term operating business, these refreshed values provide clarity and direction. They ensure we stay grounded in what drives us while adapting to the needs of the organisation 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 have the skills, knowledge, and opportunities to thrive both personally and professionally as NBI's future takes shape.



DEVELOPING OUR PEOPLE

Our expanding, international workforce brings together diverse skills and perspectives, united by a shared mission to deliver world-class fibre broadband to homes, farms businesses, and schools across Ireland.

To support growth and continuous learning, we offer:

- **Further Education Sponsorship.**
- **Internal customised eLearning.**
- **LinkedIn Learning (23K+ courses in 24 languages).**
- **Leadership and high-impact skill-building programmes.**
- **Internal mobility opportunities through open vacancies.**

We support career development through performance discussions, individual goal-setting, mentoring, coaching, and access to on-the-job learning. Our talent strategy, Connecting the Dots, integrates learning & development, leadership pathways, performance management, and employee effectiveness.



Emerging Leaders Programme

A key component of our leadership development strategy is the Leadership Development Programme, first designed and launched in 2023. This six-month blended learning experience has been made available to all people managers across NBI, including teams in both NBI Infrastructure and NBI Deployment.

The programme combines classroom learning, virtual workshops, real-world application, and cross-functional collaboration to strengthen leadership capability across the organisation.

- **Pre-Programme Activities:** Psychometric assessments, questionnaires, peer-to-peer coaching, and structured interviews to help participants identify strengths and shape personalised development plans.
- **Programme Structure:** A blend of in-person classroom sessions, virtual workshops, expert-led modules, and cross-team collaboration projects designed to challenge participants and build their leadership skills.
- **Post-Programme Activities:** Curated reading, LinkedIn Learning content, podcasts, and ongoing peer coaching to embed learning and support continuous development.

In 2024, we completed the final cohort of the Emerging Leaders Programme, originally introduced to build on the success of the Leadership Development Programme and support the next generation of leaders within NBI. This cohort ran from 2024 into early 2025 and marked the conclusion of NBI's current leadership development initiatives.

As NBI moves from deployment into full operational mode, accompanied by significant organisational restructuring and workforce right-sizing, no new leadership or emerging leader

programmes were planned for 2025. Instead, our focus is on ensuring stability, supporting our people through transition, and maintaining essential capability within the organisation.

While formal programmes are being phased out, our commitment to supporting employees remains unchanged. ESG training and sustainability awareness continue to be integrated into essential learning pathways to ensure that responsible decision-making remains a core part of our culture and day-to-day operations.

Engagement through the Connected Programme

Our employee engagement programme, Connected, provides meaningful opportunities for engagement across four pillars:

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

The programme continues to:

- Create purpose-driven engagement.
- Celebrate diversity and shared success.
- Strengthen well-being and inclusivity.
- Promote open communication and transparency.

1. 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 2025, 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

National Broadband Ireland's Gender Pay Gap for 2025 stands at 16.03%, a figure primarily driven by representation patterns that date back to the organisation's establishment in 2020, when the nature of the National Broadband Plan required the recruitment of highly experienced senior professionals - a talent pool that, at the time, was predominantly male.

Over the past two years, however, 42% of all new hires have been women, helping increase overall female participation in our workforce from 28% to 31%. While many of these new roles are at earlier career stages which naturally influences the overall pay gap, this trend reflects real and sustained progress.

We have also seen meaningful positive change at senior levels. In line with our commitments to The 30% Club, female representation on our Senior Management Team reached 36% at the 2025 snapshot date for Gender Pay Gap reporting and has since increased further to 42%. Additionally, the organisation appointed a female CEO to NBI Deployment following the reporting period, marking another significant step toward greater leadership diversity.

As NBI transitions from deployment to steady-state operations over the coming years, we expect continued fluctuation in the short term. However, we anticipate

that the gender pay gap will stabilise as the organisation evolves and as our workforce profile continues to broaden and diversify. Our long-term commitment remains unchanged - building a more equitable workplace and continuing to strengthen gender representation at all levels.

Our progress will continue to be driven by the following key initiatives:

- **Recruitment & Promotion:** Criteria have been standardised to further ensure fairness and transparency in both recruitment and promotion.
- **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.'

Diversity in Leadership

- **Senior Representation:** 42% 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 2025:** Featured an inspiring session with Sonia O'Sullivan. Her story of resilience, dedication, and pushing perceived limits served as a powerful reminder of what's possible when you believe in something bigger - and commit to the hard work it takes to make it happen. As our Chief Marketing Officer, Tara Collins, highlighted, Sonia's message strongly resonates with the journey we're on at NBI. Like Sonia, we are tackling something that has never been done before, overcoming challenges every day to deliver something truly transformational for Ireland.
- **Visa Sponsorship Support:** Assisting employees in securing work visas, reinforcing our commitment to a diverse, global workforce.
- **Advocating through 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 2025, we continued expanding representation, fostering allyship, and creating an inclusive workplace. Through education, collaboration, and action, we cultivated 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 2025, we expanded our wellness initiatives to foster a healthy, engaged, and thriving workforce while aligning with our broader ESG commitments.



Health and Wellness Initiatives

As part of our commitment to holistic well-being, we continued to offer 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. Building on the foundations we set last year, we continued to strengthen our commitment to employee wellbeing through practical support, awareness building, and meaningful wellbeing initiatives.

In 2025, we expanded our programme with a collaboration with WorkplaceWellness.ie, leading experts in workplace wellbeing, to deliver a series of engaging talks designed to support mental, emotional, and physical health. Sessions included:

- De-Stress & Get Grounded.
- Mindful Movement.
- Working with the Inner Critic.
- Cycles & Energy Management.
- Intention & Goal Setting.

These workshops offered employees tools to improve resilience, manage stress, build focus, and enhance day-to-day wellbeing.

A new initiative with Zest at Work was also introduced, offering 15-minute workplace massages to help employees unwind, reduce tension, and recharge during the workday.

Continuing Our Commitment

Alongside these new initiatives, we continued to:

- Ensure access to professional mental health services for employees.
- Raise awareness of neurodiversity and foster a workplace that values diverse mental health needs.
- Mark World Mental Health Day with activities that encourage open, supportive dialogue around wellbeing at work.

Together, these efforts reflect our long-standing belief that supporting mental health is essential to creating a thriving, inclusive, and resilient culture at NBI.

Financial Wellbeing

Recognising the strong connection between financial stability and overall well-being, we continued our partnership with PTSB to support employees in navigating financial planning with confidence. In 2025, we enhanced our programme with a dedicated Financial Wellbeing Day, held in the beginning of the year. The day featured a series of informative and practical sessions, including:

- “Getting Mortgage Ready” - guidance on preparing for mortgage applications and understanding lending criteria.
- “Managing Your Money” - tools and strategies for everyday financial decision-making.



- An economist-led discussion on the Irish market, offering insights into economic trends and what they mean for households.

To ensure accessibility, we shared session schedules and provided Teams links so remote employees could fully participate.

Throughout the day, PTSB representatives were onsite to answer individual questions on mortgages, savings, day-to-day banking, and broader financial planning.

Alongside these events, we continued to offer:

- Financial education sessions aimed at reducing financial stress.
- Access to personalised on-site banking guidance that supports long-term stability and informed financial decisions.

By strengthening our financial wellbeing offering, we maintain our commitment to holistic employee support - recognising that financial confidence, mental wellness, and physical health all contribute to a thriving and empowered workforce.

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 2025, we continued to encourage team-based physical activities supporting initiatives like workplace pilates, running and 5-a-side football. These activities not only promote physical and mental 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 fundamental to our culture. In 2025 we continued to celebrate excellence through:

- Recognition at All Hands meetings and company-wide events, where employees' achievements are highlighted and celebrated. Engagement in the recognition programme has grown significantly, with 279 nominations made this year - a 7% increase from 260 nominations in 2024.
- 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 remain central to building trust, alignment and a shared sense of purpose within NBI. Following the major enhancements introduced in 2024, our focus in 2025 has been on deepening

engagement, improving the quality of information shared, and ensuring our existing communication platforms continue to support an informed, aligned and connected workforce. In 2025, we continued to strengthen internal communications by:

- Embedding Viva Engage into everyday communication, making it a more active hub for real-time updates, leadership messages, and cross-team collaboration. Engagement increased as more employees used the platform to share project milestones, highlight successes, and participate in organisation-wide conversations.
- Further enriching our company intranet, ensuring content remains current, easy to navigate, and relevant to employees' daily needs. Regular updates to departmental pages, clearer access to resources, and more consistent posting of organisational news supported better transparency and alignment across the business.
- Maintaining a regular cadence of All Hands meetings, providing employees with direct insight into business performance, priorities, and progress. These sessions continued to foster strategic alignment, support two-way dialogue, and strengthen the connection between leadership and teams.
- Evolving our bi-weekly e-zine, integrating more employee stories, business updates, operational insights, and cross-functional highlights. This ensured employees remained informed about key developments and felt more connected to the work happening across the organisation.

Through consistent use of these communication channels, employees remained engaged, informed, and aligned with NBI's mission and achievements throughout 2025. By building on the foundations established last year, we have continued to nurture a culture where information flows openly, and everyone feels part of the journey toward delivering a transformational national project.



Actioning Feedback - Our Colleague Engagement Survey

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.

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 2026, we remain committed to engaging with our colleagues, using their feedback to shape a dynamic, inclusive, and supportive workplace culture.

Company Awards & Recognitions

Alongside operational and sustainability progress, 2025 marked a landmark year of external recognition across strategy, communications, procurement, research, ESG, project management, and marketing - reflecting the strength of our teams and culture.

Procurement, Strategy & Delivery Excellence

- National Procurement Awards – **Overall Excellence Award**
- National Procurement Awards – **Best Public Sector / SemiState / Government Procurement Project of the Year State**

Project & PMO Excellence

- National Project Awards – **PMO of the Year**

Communications, Brand & Marketing

- Business & Finance Awards – **Brand of the Year**
- Effie Awards – **Gold (IT, Telecoms & Utilities)**
- Effie Awards – **Gold (Media Idea or Innovation)**
- Media Awards – **Best Use of TV**
- The TAMIs – **Best Tactical Use of TV**
- The TAMIs – **Grand Prix / Overall Winner**

ESG, Transparency & Social Impact

- ESG Transparency Awards – **Excellence / Leading Company**
- Business & Finance ESG Awards – **Social Impact Award (Enterprise)**

Customer Experience & Research

- ESRI Customer Success Awards – **Innovation / Research Project**

Recognising Public Impact

- Civil Service Excellence & Innovation Awards – **Citizen Impact & Customer Service** (Awarded to DCCS for NBP delivery impact).

These awards reflect the collective contribution of NBI employees, contractors, and partners, showcasing excellence across delivery, governance, innovation, and customer service.

Building on this commitment to well-being, safeguarding the physical health and safety of our employees remains a top priority. In 2025, NBI continued to reinforce its health and safety initiatives, ensuring a secure and supportive work environment for all.



HEALTH & SAFETY

Health, Safety, Quality and Environment (HSQE) remain central to our organisational culture. We maintain rigorous safety standards and foster shared accountability across all teams.

Our commitment to health, safety, and proactive risk management remains central to how we operate. While no major structural changes were introduced in 2025, we continued to embed, strengthen, and rigorously enforce the initiatives established in previous years. These ongoing efforts reinforce accountability and support our culture of continuous improvement.



Key elements of our Health & Safety approach include:

- **Leadership Oversight:** Health & Safety remains to be the first agenda item at all Senior Management Team (SMT) meetings, ensuring consistent leadership focus. All incidents are reported and openly discussed to promote transparency and shared responsibility.
- **Leadership Commitment:** NBI's HSQEE Policy remains actively supported having been endorsed by both the NBID and NBII CEOs. Their continued backing reinforces the importance of maintaining continuous improvement in our Integrated Management System (IMS).
- **Proactive Risk Management:** We continue to use predictive analytics to identify high-risk activities and locations, enabling early intervention and preventive action before incidents occur.
- **Audit & Inspection Programme:** Our targeted and robust audit and inspection programme remains a cornerstone of compliance, supporting safe on-site operations and reinforcing industry best practice.
- **Reactive Incident Response:** Strengthened protocols ensure thorough investigations, timely corrective actions, and ongoing improvements to preventive measures.
- **Contractor Safety Performance Monitoring:** Contractor safety performance remains a key criterion in our tendering and evaluation processes. In-life monitoring continues throughout contract delivery, with performance issues challenges and required improvements identified and acted upon.
- **Consequence Management:** In cases where repeated underperformance against safety KPI's is identified, NBI continues to implement structured improvement plans. These plans identify key risks, set out required remedial actions and track progress through to closure.

Incident & Accident Management

We remain committed to the belief that every injury is preventable. In 2025, 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: 2025 Target LTIFR <0.34 | Result: 0.08.
- 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 investigation 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.

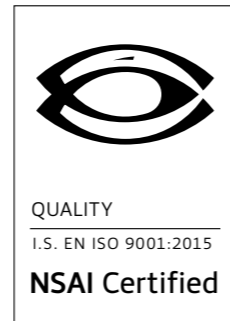
Our goal is to provide a safe working environment for every employee and contractor. By prioritising proactive risk management, continuous learning, and accountability, we are working toward an injury-free workplace.

ISO Certifications

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



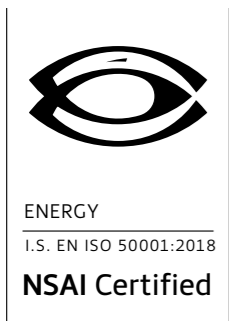
- **ISO 45001 (Occupational Health and Safety Management System):** We continue to hold our ISO 45001 certification. This standard underscores our commitment to managing risks, promoting a safe work environment, and protecting the well-being of our employees.



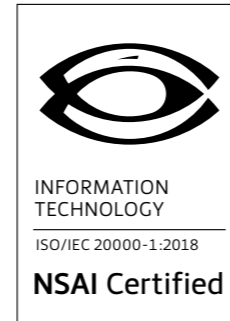
- **ISO 9001 (Quality Management System):** Quality management and safety often go hand in hand. Our ISO 9001 certification emphasises our commitment to maintaining high-quality standards, which naturally extend to safety practices.



- **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.



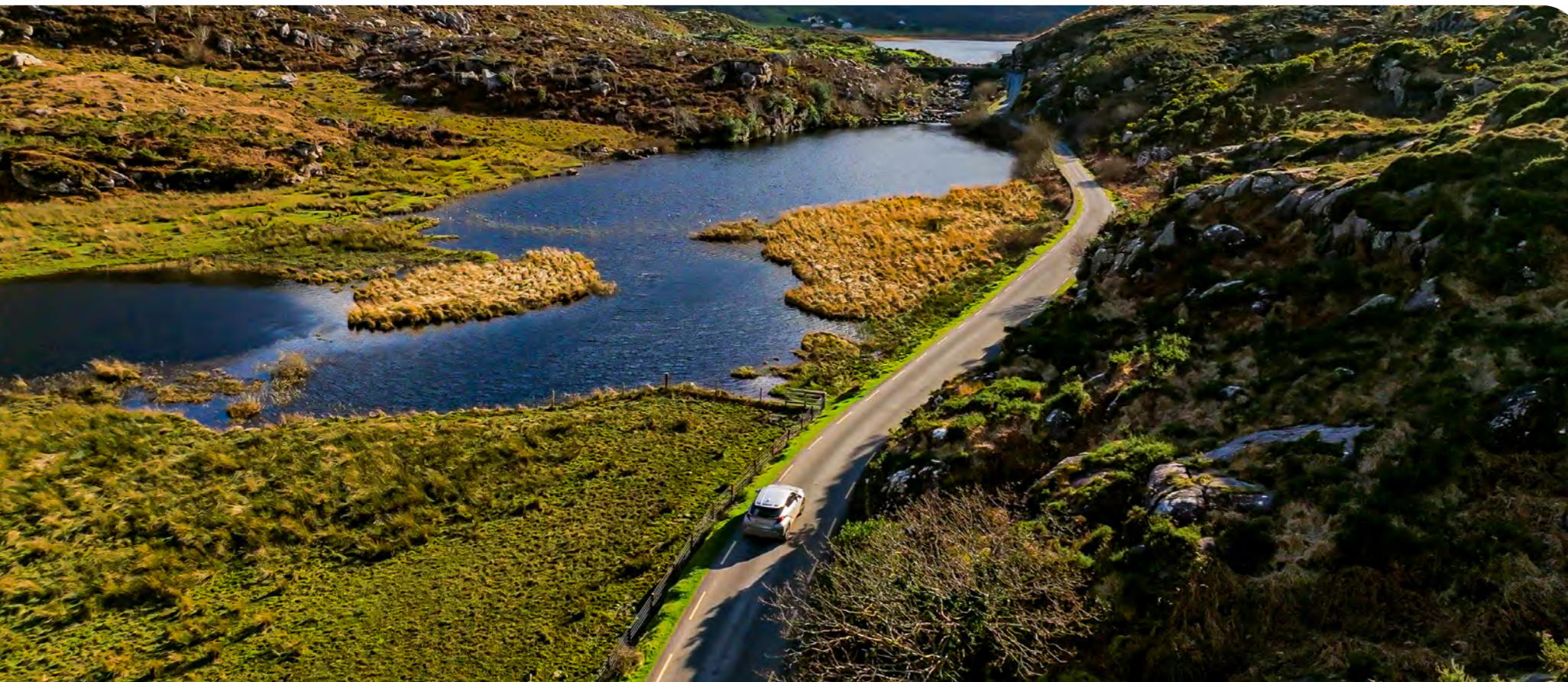
- **ISO 50001 (Energy Management System):** We are dedicated to energy efficiency and have maintained our ISO 50001 certification. This standard is essential in our efforts to reduce energy consumption, which has a positive impact on both the environment and the well-being of our workforce.



- **ISO 20001 (Service Management 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 2025, NBI successfully completed our ISO 9001, ISO 14001 and ISO 45001 surveillance audits for Cycle 2 along with completing our recertification audit of ISO 50001 Cycle 2. There were 0 non-conformances identified by the external auditor demonstrating the suitability and efficacy of NBI's IMS.

Industry Collaboration & Leadership

Recognising the critical importance of industry-wide collaboration in raising health and safety standards, NBI has continued to play a leadership role in the EHS Telecoms Industry Forum, which we helped launch in 2023. This forum brings together contractors and major infrastructure owners to share knowledge-sharing, align expectations, and establish consistent H&S standards across the telecoms sector. Following the strong foundations laid in 2023 and the deepening of collaboration in 2024, 2025 marked a year of further consolidation and strengthened alignment across participants. The Forum continued its focus on high-risk activities that affect all organisations within the sector, working collectively to refine guidance, reinforce expectations, and promote a consistent approach to safety management across project environments.

Building on the rollout of sector-specific initiatives - such as the Telecoms Temporary Traffic Management Awareness Training course and associated manual - 2025 saw sustained improvements in on-site compliance and safer execution of high-risk works. Contractors reported clearer guidance, more consistent standards, and better alignment between organisations, contributing to a safer and more predictable working environment across shared worksites.

NBI remains committed to active participation in the Forum, ensuring that industry collaboration continues to drive higher safety benchmarks and shared learning across the telecoms ecosystem.

Recognising Safety Excellence

NBI remains committed to celebrating individuals who exemplify our safety values and contribute to a strong, proactive safety culture. Building on the success of last year's launch, the Safety Person of the Year Award continued



in 2025 as an important part of our annual HSQE Week.

Introduced in 2024, the award enables peers and line managers to nominate colleagues who have demonstrated exceptional commitment to improving our Safety Management System and championing safe working practices across the organisation. As Grace Kelly, Director of HSQE and Contract Management noted at its launch, "The award gives recognition to employees that have been proactive in improving our safety management system and fostering the safety culture within NBI."

In 2025, the award continued to highlight the meaningful contributions of employees across the business - reinforcing positive behaviours, strengthening engagement, and recognising those who play a key role in shaping NBI's safety-first culture.

HSQE Week: Celebrating Teamwork

HSQE Week 2025 showcased NBI's continued commitment to safety, collaboration, and community impact. This year's theme, "Teamwork," reflecting one of our core company values and underscored the collective effort required to safely deliver the National Broadband Plan across multiple locations nationwide.

With almost 2,000 people working on sites throughout the country, ensuring the safety of everyone involved in the rollout remains our highest priority. Our strong safety performance is driven by our ability to work together - sharing knowledge, experience, and skills to continuously improve how we deliver the programme.

The week began with a site visit led by NBID CEO Jenny Fisher and Director of HSQE Grace Kelly, offering valuable insight into on-site operations and safety requirements and demonstrating the support of our senior leadership team. Beyond the workplace, NBI teams partnered with local community organisations, including the Tidy Towns committee in Dunshaughlin, helping to clear debris following recent storm conditions and reinforcing our commitment to community engagement.

A highlight of the week was Mission Collab, an interactive team challenge designed to test communication, problem-solving, and collective decision-making under time pressure. This event brought together employees from across the organisation, demonstrating how collaboration drives both safety excellence and project success.

HSQE Week 2025 not only reinforced the importance of personal responsibility and shared accountability but also demonstrated how teamwork - across NBI, our contractors, partners, and communities - continues to strengthen our safety culture and social impact.

As we safeguard the health and safety of our workforce, we also recognise that our broader social responsibility extends to employee well-being, diversity, equity, inclusion, and community connectivity. These priorities shape the way we support our people and reflect the values underpinning our sustainability strategy.

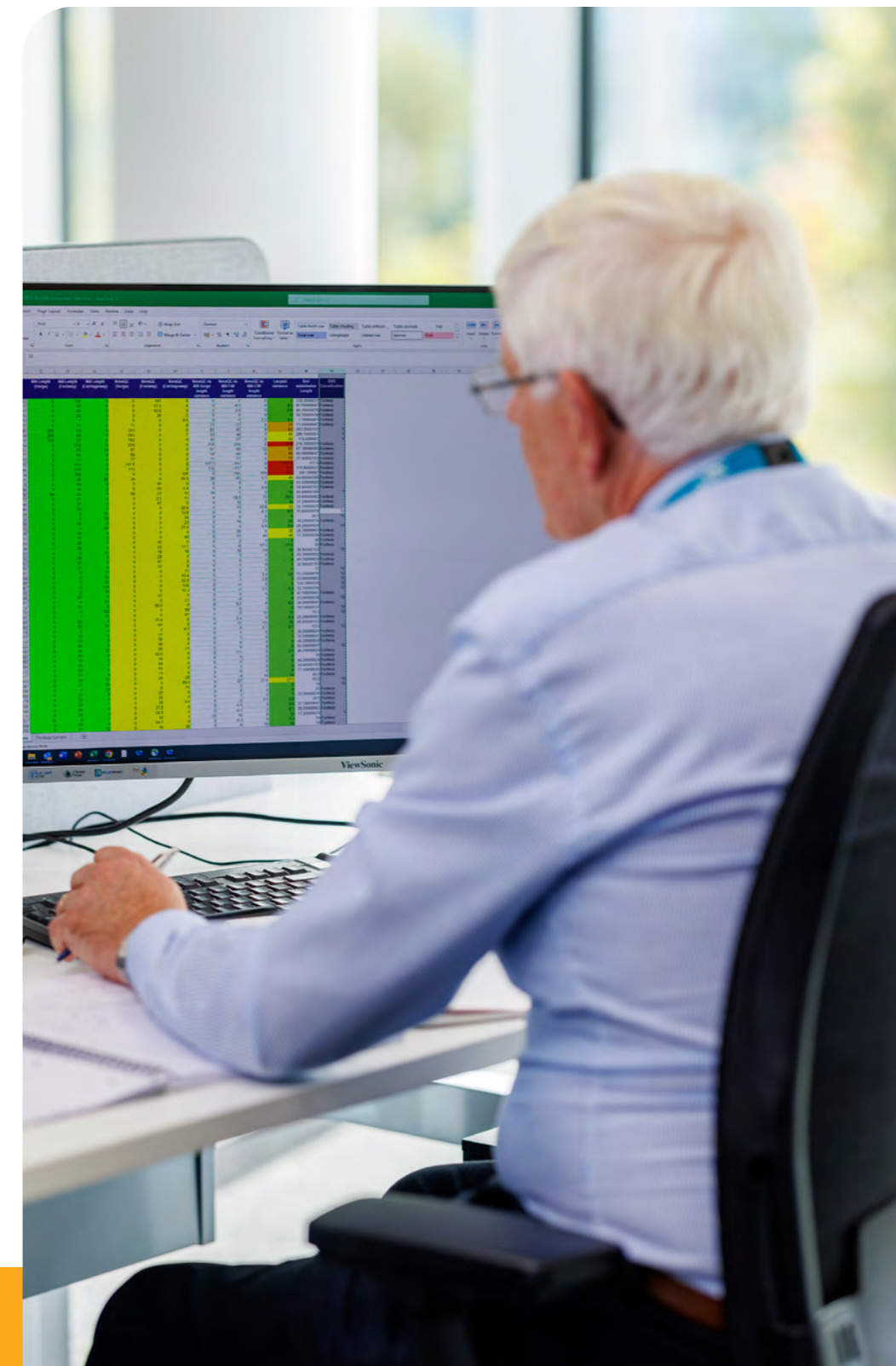
MATERIAL WORKFORCE-RELATED IMPACTS, RISKS & OPPORTUNITIES

This section outlines the key social-related material impacts, risks, and opportunities shaping NBI's organisational health strategy. In line with ESRS S1 – Own Workforce, it focuses specifically on NBI employees, and the material issues related to their well-being, safety, development, and equitable treatment.

Note: ESRS S1 captures how workplace policies, conditions, and practices influence employee experience, organisational performance, and long-term sustainability. These factors play a critical role in maintaining a safe, inclusive, and thriving workplace that supports well-being, professional growth, and equitable opportunities for all employees.

- **Material Impact:** The direct and indirect effects of NBI's workplace policies, practices, and culture on employee health, well-being, development, engagement and retention.
- **Material Risk:** Potential risks as arising from inadequate workplace conditions or ineffective people practices, including safety incidents, mental health strains, skill gaps, talent attrition, and reputational impacts if labour, DEI, or well-being standards are not upheld.
- **Material Opportunity:** Strengthening NBI's employer brand and organisational resilience by enhancing workplace safety, well-being, and inclusion, and by investing in continuous learning, leadership development and future-ready skills.

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



The identification and management of these material IROs are integral to supporting our employees and delivering on NBI’s mission to connect rural Ireland. With a clear understanding of the workforce issues that matter most, NBI focuses on the policies, actions, and targets that align with these priorities.

Our People			
S1 – Own Workforce	Material Impact	Material Risk	Material Opportunity
<p>S1-1: Secure Working Conditions</p> <p>Employee well-being & safety</p>	<p>Potential Positive: NBI is committed to a zero-harm workplace, aligned with ISO 45001, supports physical safety, mental health and overall employee well-being.</p>	<p>If safety, health, or psychosocial risks are not effectively managed, injuries, reduced well-being, or lower productivity may occur, potentially impacting service delivery.</p> <p>Mitigation: Maintain ISO 45001 standards through strong leadership oversight, targeted audits, risk analytics, active reporting culture, and consistent contractor safety management. Strengthen hybrid-work governance and mental health supports.</p>	<p>Strengthen safety culture through leadership engagement, continuous training, well-being initiatives, and development pathways that build a resilient, future-ready workforce.</p>
<p>S1-2: Equal Treatment and Opportunities for All</p> <p>Diversity, Equity & Inclusion (DEI)</p>	<p>Actual Positive: Promoting diversity, equity, and inclusion enhances team performance, innovation, and a sense of belonging.</p>	<p>If DEI principles are not upheld or progress slows, dissatisfaction, lower engagement, attrition, and reputational harm may arise.</p> <p>Mitigation: Apply equitable recruitment and progression processes, conduct annual pay equity reviews, deliver DEI training, and maintain clear reporting channels and participation targets for underrepresented groups.</p>	<p>Embed DEI across hiring, leadership, development, and culture to improve innovation, employer brand, decision quality, and talent attraction and retention.</p>
<p>S1-3: Other Work-Related Rights</p> <p>Hybrid work and well-being</p>	<p>Actual Positive: Flexible and hybrid working arrangements support well-being, safety, and improved work-life balance.</p>	<p>If communication, clarity, workload balance, or remote-work supports are insufficient, morale, productivity, and engagement may decline.</p> <p>Mitigation: Provide structured hybrid-work guidelines, manager training, regular engagement checks, clear communication, and accessible well-being resources.</p>	<p>Modern, flexible working models enhance engagement, retention, productivity, and overall employee satisfaction.</p>

INTERNAL WORKFORCE POLICIES & COMMITMENTS

At NBI, we prioritise creating a supportive, safe and inclusive workplace where employees are empowered to thrive. Our Employee Handbook sets out the values, expectations, and benefits that shape our culture, providing clarity on workplace conduct, employee rights, organisational policies, and the supports available to staff. This resource underpins a transparent, respectful environment where employees feel valued, informed and equipped for success.

Our commitment to Diversity & Inclusion is embedded in our core policies. NBI's D&I Policy reinforces our dedication to equal opportunity, pay equity, and fair treatment for all employees - regardless of background, identity, or personal characteristics. We recognise that a workforce reflective of the communities we serve strengthens innovation, creativity, and long-term performance. Through this policy, we actively foster a culture that values individuality, celebrates difference, and encourages collaboration across teams and functions.

As we continue to build on this foundation, our progress is supported by specific, measurable goals aligned with our strategic priorities.

Key Social Goals for 2025

- **Workforce Diversity & Inclusion:** Advance gender balance across the organisation, with a continued focus on female representation in leadership.
- **Employee Well-being & Engagement:** Strengthen mental, physical, and financial well-being supports while fostering a safe, healthy workplace.
- **Safe Working Environment:** Maintain ISO 45001 and ISO 14001 certification, ensuring world-class safety and environmental management.

- **Operational Excellence:** Continue to achieve an LTIR which is industry leading.
- **Skills & Workforce Development:** Provide training, leadership development, and performance support that empower employees to grow.

These goals guide our actions and ensure that our commitments translate into measurable outcomes.

Workforce Actions

To achieve these priorities, NBI continues to deliver targeted initiatives across key workforce pillars:

- **Skills & Workforce Development:** Offering training, learning pathways, leadership programmes, and internal mobility to support career growth.
- **Diversity, Equity & Inclusion (DEI):** Strengthening inclusive hiring, ensuring pay equity, and promoting representation at all levels.
- **Well-being & Social Sustainability:** Enhancing mental, physical, and financial well-being supports, as well as fostering a connected, community-minded culture.
- **Community Engagement & Partnerships:** Supporting local initiatives, education programmes, and sustainability-related community activities.
- **Colleague Recognition:** Celebrating achievements that reflect our values and contribute to organisational success.
- **Internal Communications:** Delivering alignment by providing transparent, timely communication through Viva Engage, intranet enhancements, and regular leadership updates.

Expanding Our Impact in 2026

Our focus continues to centre on:

- **Diversity & Inclusion:** Embedding belonging and equal opportunity into everyday practice.
- **Wellness & Social:** Supporting holistic well-being and nurturing strong community connections across the business.
- **Colleague Recognition:** Reinforcing a culture where contributions and achievements are celebrated.
- **Internal Communications:** Strengthening trust and alignment through clear, open communication.

By prioritising our people, we ensure that NBI remains a place where employees can grow, contribute, and make a meaningful impact.



TARGETS & PERFORMANCE

NBI monitors progress against clear, measurable workforce targets, which are reviewed regularly by the Senior Management Team (SMT) and reported to the Audit and Risk Committee (ARC), and Board quarterly. Key targets include:

- **Diversity & Inclusion:** Maintain at least 30% female representation in leadership roles.
- **Engagement & Satisfaction:** Achieve strong employee satisfaction scores through surveys, focus groups, and continuous feedback channels.
- **ISO Compliance:** Meet and exceed ISO 45001 and ISO 14001 standards, ensuring robust safety and environmental performance, whilst driving continuous improvement.
- **Safety Performance:** Continue to achieve an industry leading LTIR.

These targets reinforce our commitment to well-being, diversity, inclusion, and a safe, high-performing workplace. They ensure that our workforce remains equipped and empowered to contribute to NBI's ESG objectives and long-term organisational success.

NBI's ongoing investment in workforce policies, employee well-being, diversity, and development strengthens operational resilience and contributes to long-term sustainability. Our commitment to building a supportive, inclusive, and well-equipped workforce extends naturally into the broader impact we have on communities across Ireland.

The next section, Our Impact, outlines how NBI contributes to local development and community connectivity through our operations and stakeholder engagement.



OUR IMPACT

Supporting Affected Communities

NBI is committed to bridging Ireland’s digital divide by supporting rural and underserved communities through the delivery of high-speed broadband, digital education, and inclusive community initiatives. Our approach is built on early identification of affected communities, meaningful engagement, assessment of potential social impacts, proactive mitigation, and continuous monitoring of outcomes to ensure lasting and equitable benefits.

In the National Broadband Plan (NBP), we continue to make significant progress across the Intervention Area (IA) - ensuring no community is left behind as Ireland transitions to a digitally enabled future. Our work supports social equity, local development, economic resilience, and long-term opportunity for communities nationwide.

“Fibre aims to provide homes and businesses with download and upload speeds of up to one gigabit,” explains Joe Lavin, Chief Commercial Officer of NBI. “That’s important from an equitable perspective because it gives everyone, irrespective of location, the same opportunities for remote learning, home working, streaming entertainment and remote consultations with a doctor.”

Our Corporate Social Responsibility

Connectivity is foundational to social and economic participation. NBI recognises the critical role that high-speed broadband plays in empowering communities - enabling access to education, public services, healthcare, remote work, and modern business opportunities.

Our CSR approach focuses on:

- Reducing digital inequality,
- Supporting inclusive community development,
- Creating pathways to skills and employment, and
- Driving equitable access to digital opportunity.

Note: S3 - Affected Communities (as defined under the ESRS framework) focuses on the material impacts, risks, and opportunities related to communities affected by NBI’s operations. This section outlines our commitment to advancing digital inclusion, strengthening community resilience, and ensuring equitable access to opportunity across the IA.

MATERIAL COMMUNITY-RELATED IMPACTS, RISKS & OPPORTUNITIES



Affected Communities			
S3 – Affected Communities	Material Impact	Material Risk	Material Opportunity
S3-1: Communities’ Economic, Social and Cultural Rights Broadband access & community connectivity	Potential Positive: Expanding reliable broadband access for underserved areas enables digital inclusion, improved access to public services, and local economic development.	If socio-economic gaps persist, digital exclusion may limit equitable access to services, opportunities, and community participation. Mitigation: Prioritise underserved areas in planning, engage directly with communities, and deliver initiatives that support affordability, accessibility, and digital-skills development (e.g., capacity-building programmes).	Use digital connectivity to empower communities by enabling education, remote work, tele-services, entrepreneurship, and sustainable local economic growth.

This assessment reflects NBI’s responsibility to deliver connectivity in a way that protects community well-being, promotes equal access.

Identification of Affected Communities

Under the National Broadband Plan, the Intervention Area (IA) is defined by the Government of Ireland. NBI's role is to design, build and operate the fibre network within this predetermined footprint. As a result, we do not determine which communities are included; instead, we focus on delivering high-quality, future-proofed broadband to all premises assigned to us.

Within the IA, many communities have historically faced limited or unreliable broadband access. Our engagement approach is therefore shaped around understanding local contexts, supporting households and businesses during the build and connection phases, and ensuring that the long-term benefits of fibre broadband are realised across the network.

Key groups within the IA typically include:

- Rural residents and remote households.
- Farmers and agricultural enterprises.
- Students and young learners.
- Small businesses and local entrepreneurs.
- Community organisations and essential service providers.

By tailoring our engagement to the diverse needs of these groups, we help ensure that the rollout delivers meaningful, lasting benefits and supports inclusive digital participation across all communities in the Government-defined Intervention Area.

Engagement with Affected Communities

Principles

Our approach to community engagement is grounded in:

- **Inclusive Access:** Ensuring all communities - especially those in remote or vulnerable locations - have access to reliable, future-proof fibre broadband.
- **Collaborative Engagement:** Working closely with local authorities, residents, community groups, and public bodies to understand local needs and co-design tailored solutions.
- **Environmental Stewardship:** Mitigating environmental risks through surveys, assessments, and compliance with all statutory protection processes.

These principles guide our decision-making and ensure our work enhances community resilience, well-being, and long-term opportunity.

Mechanisms

To ensure effective delivery and local alignment, NBI uses targeted mechanisms to engage affected communities and deliver tailored connectivity solutions:

- **SCP/BCP Fibre Migration Programme**
This programme upgrades schools, community centres, and Broadband Connection Points from wireless to high-quality fibre, enhancing speed, reliability, and uptime. Local engagement is central to addressing enabling works - such as electrical upgrades, civils requirements, and site access - ensuring minimal disruption and maximum benefit.

- **Island Connectivity & Resilience (Our Living Islands)**
Working in partnership with island residents, local authorities, and government departments, NBI designs bespoke solutions that address unique geographic, climate, and resilience challenges. This includes:
 - Backup power systems for mission-critical buildings.
 - Dual-path fibre configurations to avoid single points of failure.
 - Emergency connectivity through dark fibre and satellite redundancy.
 - Community-specific resilience measures shaped through on-island consultation.

Key Engagement Initiatives

- **Community Consultations:** Regular forums, information sessions and feedback engagements with residents, farmers, local authorities and community groups.
- **Grassroots Initiatives:** Local outreach to schools, sports clubs, community centres, and volunteer organisations to build trust, raise awareness, and support digital empowerment.

Through these partnerships and engagements, NBI not only delivers digital infrastructure but supports communities in shaping their digital futures. Our work is underpinned by robust engagement and disclosure policies that support transparency, accountability, and trust.

Policies

Stakeholder Disclosure Boundary Policy

NBI is committed to ethical, transparent, and responsible stakeholder engagement. Our Stakeholder Disclosure Boundaries Policy ensures relevant information is shared appropriately while safeguarding commercially sensitive and confidential data. By defining clear communication boundaries for different stakeholder groups—including end users, broadband providers, government entities, and civic organisations—the policy reinforces consistency, integrity, and trust across all interactions.

Social and Community Dialogue Policy

NBI promotes open, two-way dialogue with the communities we serve, ensuring their feedback and perspectives inform our initiatives. This policy formalises our commitment to active listening, transparency, and collaboration, and supports relationship building with residential, business, agricultural, and civic stakeholders. Through this approach we aim to enhance community well-being, foster trust, and support the successful delivery of our objectives.

These policies guide our engagement approach and ensure that community insights translate into meaningful action and long-term impact.

Actions

NBI's initiatives directly support digital inclusion, local economic development, and rural community.

- Bridging the Digital Divide: Over 451,433 premises are passed, of which 22,176 farms and 4,873 businesses are now connected cumulatively, increasing digital access for families, students, entrepreneurs, and agricultural innovators.

- Empowering Communities: Enhanced access to education, remote working, and telemedicine in areas where high-speed broadband was previously unavailable.
- Enabling Economic Development: Improved digital infrastructure has strengthened productivity and competitiveness for rural businesses and farms.
- Social Inclusion: Connectivity expands opportunities for disadvantaged and remote populations, supporting equitable access to public services and digital participation.

These actions align with our mission to create inclusive digital access and strengthen long-term social and economic sustainability across rural Ireland.

Targets and Performance

NBI sets clear targets to measure impact and ensure connectivity reaches even the most remote and disadvantaged communities.

Key Community Impact Milestones

- Connectivity in the Black Valley, Co. Kerry – Delivering high-speed broadband to one of Ireland's most isolated areas, supporting families, and local tourism.
- Island Communities - Of the 27 identified island deployment areas, 16 are now live, including major milestones such as Achill Island. Connectivity is enabling remote work, education, local enterprise, and community resilience. (See our website for the latest island stories.)
- Developing Rural Resilience – 4,873 businesses and 22,176 farms are now connected to date, with a medium-term goal of reaching 65,000 farms, supporting sustainable agriculture, precision farming, and agri-business growth.

- SCP/BCP Fibre Migration - Upgrading sites from wireless to full fibre delivers measurable improvements:
- Performance: Higher speeds, lower latency, improved reliability, and reduced failure modes.
- Operational Efficiency: Fewer maintenance visits and more stable ongoing performance.
- Social Value: Enhanced access to education, public services, remote work opportunities, digital skills programmes, and community activity.

Island Connectivity & Resilience - Our island resilience programme applies advanced connectivity and redundancy solutions tailored to each island community:

- Resilience built through redundancy, including dark fibre backups to satellite connectivity (e.g., Starlink).
- Multiple fibre paths engineered to prevent single points of failure.
- Mission-critical buildings (health centres, hubs) connected with dedicated fibre and backup systems.
- Emergency activation example: During Storm Éowyn, BCPs provided essential connectivity supporting community response (e.g., Clonkill GAA Hub).



- Environmental Protection and Stewardship - All works in ecologically sensitive areas undergo rigorous assessment and mitigation planning, including:
 - Flora and fauna surveys on islands such as Inishbofin.
 - Habitat checks for protected species (e.g., the Kerry slug in the Black Valley; corncrake habitats on Tory Island).
 - Natura Impact Statements and Appropriate Assessment screenings.
 - Full compliance with National Park and Wildlife Services (NPWS) and local authority environmental requirements.

These achievements demonstrate our role in enabling innovation, rural diversification, and inclusive economic opportunity.

COMMUNITY INVESTMENT & SUPPORT

NBI is committed to fostering rural employment, entrepreneurship, and community well-being through local partnerships and targeted investment. By supporting local initiatives — from digital inclusion to volunteerism — NBI helps strengthen the social and economic fabric of rural Ireland.



Corporate Volunteering & Community Stewardship

NBI also supports communities through hands-on volunteering initiatives that promote environmental care, social cohesion, and local well-being.

Clean Coasts – Corporate Beach Clean-Up

In August, NBI employees participated in a Corporate Volunteer Day at Bull Island in partnership with Clean Coasts. Together, volunteers collected 49 kg of waste, helping protect one of Dublin’s most important natural habitats. This initiative reflects our ongoing commitment to environmental stewardship and meaningful collective action beyond our core operations.

Holiday Volunteering – Supporting Children & Families

During the festive season, NBI colleagues volunteered to assemble craft packs for children attending DEIS primary schools and organisations supporting families in need. These handmade packs offered moments of creativity, comfort, and connection at a time of year when community support matters most.

The initiative showcased the generosity and unity of our team, spreading goodwill across Ireland.

Together, these efforts demonstrate NBI’s commitment to supporting local communities through practical, grassroots initiatives that enhance well-being, strengthen social bonds, and contribute to a more inclusive and compassionate society.

RISE Community Fund – Supporting Rural Innovation and Digital Inclusion

The RISE Community Fund, supported by NBI, provides small grants to rural schools, community groups, social enterprises, and micro-businesses to help them adopt digital tools and broadband-enabled opportunities. The fund focuses on reducing the digital divide by empowering people in rural

communities to access skills, equipment, and connectivity that support innovation, digital inclusion, and local economic development.

Through RISE, NBI helps communities leverage high-speed broadband to:

- Enhance digital education and skills,
- Support local enterprise and job creation,
- Enable remote work opportunities,
- Foster creativity, social impact, and community resilience.

The following groups were supported through the RISE Community Fund in 2025 and demonstrate the diverse ways in which broadband-enabled innovation strengthens community resilience, inclusion, creativity, and local economic opportunity:

- Clara Community Hall,
- Waller Family Farm,
- Tulsk Digi Hub,
- Islandeady Community Centre,
- St Patrick's NS, Emyvale,
- Cloonakilla NS,
- Drumfries NS,
- St Patrick's NS, Knockafall,
- Killinure NS,
- St Patrick's NS, Glencullen,
- Westmeath Scout Group,
- House of Achill,
- Murrays Plastic,
- One Veterans.

These examples illustrate the diverse ways in which connectivity strengthens community resilience, digital inclusion, economic participation, and social well-being across rural Ireland.

Tracking and Monitoring Outcomes

NBI evaluates the effectiveness of its community engagement and support initiatives through ongoing monitoring and data driven insights. Tools and processes include:

- Community Feedback Surveys: Gauging satisfaction, priorities, and emerging needs.
- Connection Metrics: Tracking uptake and network activation in underserved communities.
- Socio-Economic Impact Assessments: Measuring outcomes in job creation, education access, digital inclusion, and business growth.
- Annual Reviews: Reporting progress, identifying challenges, and shaping future initiatives.

These measures allow NBI to continually assess and strengthen its contribution to a more inclusive and digitally empowered society.

Mitigation Measures and Support

To minimise disruption and maximise positive community outcomes, NBI implements tailored support measures, including:

- Minimising Disruption: Clear communication of construction schedules, stakeholder briefings and support for residents during build activities.
- Digital Inclusion Initiatives: Supporting education, career pathways, and community empowerment through the Connected Programme.

These mitigation measures ensure communities experience a smooth transition as broadband infrastructure is deployed, while also enhancing local safety and well-being. 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

Beyond direct community support, NBI's Connected Programme invests in broader initiatives that promote digital inclusion, education, career development, and participation in Ireland's digital economy. These initiatives strengthen community capacity, create pathways into future-focused careers, and ensure that the benefits of connectivity extend far beyond infrastructure.

Advancing Gender Representation through The 30% Club and WIN Ireland

In addition to supporting youth, NBI is committed to fostering gender diversity across the infrastructure and technology sectors through its partnership with the Women's Infrastructure Network (WIN) Ireland.

2025 Highlights

- Supporting the 30% Club Ireland to increase female representation at senior leadership levels. "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." – Grace Kelly, Director of HSQE & Contract Management
- NBI colleagues played an active role in event development and delivery, ensuring professional execution and alignment with WIN's objectives.

This partnership reflects NBI's ongoing commitment to advancing gender equity, building leadership pipelines, and supporting diversity in the infrastructure sector.

Community Sponsorship & Local Partnerships

NBI provides targeted support to community organisations through sponsorships, donations, and partnerships that strengthen local services, empower volunteers, and enhance social inclusion.



Engagement with Affected Communities

2025 Community Sponsorships

In 2025, NBI continued its commitment to supporting local organisations through community sponsorships, benefiting schools, GAA clubs, football clubs, rugby teams, cultural groups, and community events nationwide including:

- St. Itas AFC.
- Balbriggan Rugby Football Club.
- Straffan AFC.
- Na Fianna CLG.
- Dalkey School Project.
- St. Peters GAA Club.
- Partry Athletic AFC.
- Naas Scout Den.
- Innis Mór.
- Fethard St. Mogue's GAA Club.
- Coolmine Rugby Club – Under 8s.
- Templeogue United FC – Under 8s.
- Cavan Town Comhaltas – Annual Ed Reavy. Traditional Music Festival.
- Half Way House, Bunclody GAA Club.
- Highview Athletic Football Club.
- Kilcullen U14 Camogie Team.



Youth & Sports Engagement

NBI continues to champion youth development, community cohesion, and grassroots sport through targeted partnerships, including:

- **National Macra Club of the Year 2025** – Raphoe Macra, proudly sponsored by NBI.
- **Regional Macra Clubs of the Year 2025** –
 - Mountmellick Macra (Leinster).
 - Ballylanders Macra (Munster).
- **Supporting Innovation in Agriculture** – Sponsorship of the Macra Farm Tech & Business Award, empowering young farmers to adopt cutting-edge technology and sustainable practices edge technology and sustainable practices.
- **Strengthening Local Sports** – Ongoing sponsorship of Kildare GAA, supporting community sport and youth participation.

Charity Partnerships

NBI continues to support social inclusion and community resilience through charity engagement, including:

- Donations to **St. Vincent de Paul** during the Christmas 2025 period, helping families experiencing financial hardship during the winter months.

These partnerships ensure that community organisations across Ireland have the resources they need to grow, innovate, and support well-being at a local level.

As we continue to empower rural and underserved communities through connectivity, capacity-building and targeted partnership programmes, we remain committed to upholding the highest standards of responsible business conduct. Our work to build an equitable digital society is grounded in ethical practices, transparent governance, and a commitment to long-term value creation for our stakeholders and the communities we serve.

Our Governance Commitment



100%
Employees completed
information security
awareness training

0



Major cyber
incidents



100%
Employees signed up
to Code of Conduct



Contractor performance
2,438
Internal audits conducted*

*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 2025, NBI continued to operate within the robust governance framework established under the Department of Culture, Communications and Sport (DCCS), ensuring transparency, accountability, and ethical conduct in the State-supported rollout and operation of Ireland's high-speed broadband network. With the programme moving further into steady state operations, governance evolved to emphasise effectiveness and efficiency.

- **Right-sized Governance Cadence:** Working Group (WG) and forum frequencies were refined to reflect programme maturity and operational priorities.
- **Clear Accountability and Escalation:** Decision-making pathways and escalation criteria were clarified to ensure timely, risk-based decisions.
- **Targeted Participation:** Membership was streamlined to drive focused, outcome-oriented discussions.

These measures sustained strong oversight while supporting delivery within a lean operating environment.

CORPORATE GOVERNANCE

NBI's governance is grounded in integrity, transparency, and accountability. In 2025, we continued to align with best practices and the principles of 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. Compliance training continues to be applied proportionately across management levels.
- **Transparency in Reporting:** We continue to broadly align with ESRS, addressing material ESG IROs (E1, S1, S3 and G1), improving processes that support non-financial disclosures.

- **Risk Management:** ESG risks - including corruption, data privacy, supply chain risk, and conflicts of interest - are integrated into our Enterprise Risk Management (ERM) framework and reviewed at the Audit and Risk Committee (ARC) and Board.
- **Stakeholder Engagement:** Feedback from the Department, users, customers and civil society informs decision-making, balancing transparency with confidentiality and commercial sensitivity.

As part of this ongoing commitment, NBI continues to embed its core values into governance practices, ensuring that sustainable and ethical principles guide decision-making across the organisation. This provides a strong foundation for our sustainability governance approach outlined on the next page.



Corporate Governance Values

NBI's governance is grounded in 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 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 (DCCS) 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 DCCS.
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

NBI employs a lean, cross-functional sustainability governance model that systematically embeds ESG considerations across strategy, risk management, and operational decision-making.

Board and ESG Oversight:

- The Audit & Risk Committee ensures strategic alignment and provides oversight of ESG risks, controls, and disclosures.
- The Board regularly reviews ESG performance and emerging risks.
- Directors complete annual ESG training to support oversight of regulatory developments and stakeholder expectations.

Risk Management:

- ESG risks are integrated into our Enterprise Risk Management (ERM) framework with risks owners across the business.
- Internal sustainability controls and data quality checks are supported by targeted assurance.

STAKEHOLDER ENGAGEMENT

In 2025, NBI strengthened engagement practices broadly aligned to ESRS G1, including mapping of stakeholder groups, targeted engagement methods, and integration of feedback into decision-making.

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

- Stakeholder Group 1: End Users.
- Stakeholder Group 2: NBI's Customers (Broadband Providers / Retail Service Providers).

- Stakeholder Group 3: Government.
- Stakeholder Group 4: Other Stakeholders (including civic society, membership bodies, and representative organisations).

Stakeholder touchpoints included targeted workshops, surveys and forums, and thematic dialogues - e.g., engagement linked to the BCP/SCP fibre migration - to capture perspectives and address impacts, risks, and opportunities.

Governance of Change Management

NBI applies a structured change management approach, grounded in the Prosci ADKAR model (Awareness, Desire, Knowledge, Ability, Reinforcement), to guide sustainability initiatives.

Following the Phase 1 Organisational Change Impact Assessment (2023) and the ESG Change Impact Assessment (2024) using stakeholder salience, in 2025 we focused on:

- Prioritising high impact functions and dependencies.
- Targeted engagement proportional to impact, level of support, and rationale.
- Leveraging existing governance forums to integrate ESG with minimal additional overhead.

This approach enables pragmatic, risk-based integration of sustainability across a lean operating environment.

REGULATORY COMPLIANCE

Regulatory compliance remains central to NBI's governance approach, ensuring adherence to legal and industry standards. In 2025 we:

- Continued structured engagement with relevant authorities to ensure compliance with national regulations.
- Reinforced information security and privacy measures to safeguard critical data and infrastructure.
- Advanced alignment with evolving regulatory frameworks relevant to telecoms and cybersecurity.

Commission for Communications Regulation Overview

As Ireland's communications regulator, Commission for Communications Regulation (ComReg) ensures fair, efficient market practices and safeguards end-users. NBI complies with the applicable obligations and engages constructively to uphold transparency and service quality.

Cybersecurity & Regulatory Readiness

NBI prioritises the security, integrity, availability, and confidentiality of systems and data. Our security approach is aligned to recognised standards such as the Centre for Internet Security (CIS), National Institute of Standards and Technology (NIST), and International Organisation for Standardisation (ISO), supported by collaboration with national and industry forums.

Key Areas of Focus in 2025

- **Regulatory Alignment:** Continued preparedness for evolving expectations under NIS2 and related national measures, including ongoing dialogue with relevant authorities and monitoring of guidance.
- **Readiness & Assurance:** Independent assessments informed maturity improvements in risk management and incident response.

- **Security Governance:** We maintained ISO/IEC 27001 (Information Security) and successfully completed ISO/IEC 27701 (Privacy) recertification for Cycle 2.
- **Cyber Risk Management:** We applied risk-based controls with a focus on supply chain security and contractual requirements for third parties.
- **Security Culture:** Ongoing training, access management, and secure-by-design practices.
- **Incident Response & Continuity:** Structured incident management, disaster recovery and continuity planning to safeguard service delivery.
- **Continuous Improvement:** Defense-in-depth strategy, regular reviews and adaptive controls in line with threat evolution.

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

Alignment with the ESRS – EU Regulatory Reporting Framework

As outlined in our 'Basis for Preparation,' NBI continues to broadly align its 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 strengthens 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 & OPPORTUNITIES

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:** Strong governance, ethical decision-making, and compliance foster stakeholder trust and long-term resilience.
- **Material Risk:** Regulatory non-compliance, unethical practices, reputational harm, cyber threats, supply chain vulnerabilities, and delivery risks under resourcing constraints.
- **Material Opportunity:** Strengthening governance and assurance, enhancing supplier standards, improving data quality, and building long-term value through ethical leadership.

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	Actual Positive: A strong culture of ethics, accountability, and transparency supports responsible decision-making and organisational resilience.	If corporate culture weakens, cultural drift, disengagement, and increased ethical breaches may occur. Mitigation: Deliver regular Code of Conduct training, reinforce speak-up mechanisms, and ensure consistent, transparent leadership communication across the organisation.	Strengthen organisational trust and reputation by fostering an open, values-driven culture through ongoing ethics training, transparent communication, and recognition of ethical behaviours.
G1-1: Service Reliability Data governance and cybersecurity	Actual Positive: Strong data protection, cybersecurity controls, and resilience measures safeguard personal data, maintain service reliability, and protect stakeholder trust.	If data-governance or cyber-security controls fail, data breaches, service outages, regulatory penalties (e.g., GDPR, NIS2), and reputational harm may occur. Mitigation: Maintain robust security controls, incident-response capabilities, resilience and penetration testing, and enforce vendor security requirements across the supply chain.	Enhanced cybersecurity, data governance, and business continuity improve network performance, protect customer data, strengthen regulatory compliance, and differentiate NBI as a reliable and trusted wholesale provider.
G1-5: Fair Supplier Relationships	Potential Positive: Fair, transparent supplier management strengthens supply chain resilience and supports responsible business practices.	If supplier due diligence is weak or relationships deteriorate, disruptions, compliance gaps, and labour/human-rights risks may increase. Mitigation: Apply risk-based supplier engagement, proportionate ESG expectations, contractual requirements, performance monitoring, and diversification to reduce dependency risks.	Embed ESG criteria, transparent selection, fair terms, and P1-P4 segmentation to drive supply chain resilience, ethical performance, and long-term value creation.

ETHICAL BUSINESS CONDUCT

NBI is committed to ensuring that our ESG efforts translate into meaningful action through robust corporate governance to ensure meaningful, risk-based action.



POLICIES & COMMITMENTS

- The Board oversees sustainability through regular ESG reporting and risk reviews.
- We uphold a Code of Conduct for employees, contractors, and suppliers, along with anti-corruption and anti-bribery policies aligned to international best practice.
- We maintain confidential speak-up and whistleblowing channels with non-retaliation protections and independent oversight.
- Mandatory training supports a culture of compliance and ethical behaviour.
- In procurement, we integrate ESG criteria and continue to mature supplier standards and risk-based due diligence.

This commitment ensures a transparent, accountable, and ethically responsible organisation. Building on these principles, we have outlined the following key governance goals for 2025.

KEY GOVERNANCE GOALS FOR 2025

- **ESG Oversight:** Maintain clear Committee and Board accountability, continuing regular ESG risk and performance reviews. Reinforce ESG oversight by ensuring clear Board and Committee accountabilities supported by regular ESG risk and performance reviews.
- **Transparent ESG Reporting:** Continue broad adherence to E1, S1, S3 and G1; improve data quality controls and documentation.
- **Cybersecurity & Data Governance:** Maintain certifications and enhance NIS2-readiness, incident management, and supplier security.
- **Ethical Business Conduct:** Ensuring 100% compliance with our Code of Conduct, maintaining the highest standards of integrity across our operations.
- **Procurement:** Embed ESG into sourcing and progress proportionate supplier engagement and standards. Progress the development of proportionate supplier ESG standards and expectations, supported by risk-based engagement.

GOVERNANCE ACTIONS

- **Embedding ESG:** Quarterly ESG reviews integrated into ERM and annual planning.
- **Reporting & Controls:** Enhanced process documentation and targeted internal assurance over key metrics.

- **Cybersecurity & Data Protection:** Conduct regular security audits and ensure data governance policies align with the EU's Network and Information Systems Directive 2 (NIS2).
- **Ethics & Training:** Mandatory Code of Conduct and role-based training; reinforcement through leadership communications.
- **Procurement:** Risk-based supplier assessment and continued development of supplier standards and expectations through Supplier Code of Conduct.



TARGETS & PERFORMANCE

As part of our ongoing commitment to transparency and accountability, we have set the following ESG targets for 2025:

- **ESG Oversight:** Board / Committee ESG reviews completed as planned.
- **Transparent ESG Reporting:** Priority disclosures mapped and underlying controls documented.
- **Cybersecurity:** ISO/IEC 27001 maintained and 27701 recertification achieved.
- **Ethical Conduct:** 100% of employees completed Code of Conduct training.
- **Sustainability in Procurement:** 85% of high-impact suppliers engaged on ESG compliance and Supplier Code of Conduct rolled out.

COMMITMENT TO CONTINUOUS IMPROVEMENT

In response to ESRS principles, NBI strengthened:

- Stakeholder engagement breadth and responsiveness.
- Risk management and internal controls to identify and address ESG risks.
- Governance oversight through the Green Team and cross-functional integration.
- Transparency via clearer methodologies, controls, and accountability for sustainability information.

LOOKING AHEAD: STRATEGIC FOCUS FOR 2026 AND BEYOND

NBI will continue to enhance governance to support reliable operations under the NBP and align with evolving regulatory expectations. We will prioritise risk-based ESG integration, supplier engagement, cybersecurity resilience, and data quality as we maintain our focus on ethical conduct, strong controls, and long-term value creation.



Closing Statement

At NBI, sustainability is integral to our mission to deliver a world class, high-speed broadband service that enables equal access across Ireland's Intervention Area. Our commitment to environmental responsibility, social inclusion, and strong governance informs every decision - so the digital future we are building and operating is secure, equitable, and sustainable.

TOGETHER, WE ARE DELIVERING TODAY
WHILE PROTECTING TOMORROW.



Rialtas
na hÉireann
Government
of Ireland

Tionscadal Éireann
Project Ireland
2040

BUILDING A LIMITLESS IRELAND

