# ENVIRONMENTAL, SOCIAL & GOVERNANCE REPORT

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Environmental, Social & Governance report

# SUSTAINABILITY STATEMENT

In today's fast changing world, we cannot overstate the importance of sustainability. Our industry works at the heart of the digital revolution, connecting people and businesses across the globe. With this privileged position comes the responsibility to make sure that growth does not come at the expense of the environment or society.

As a leading satellite communication company, SES is uniquely placed to drive positive change. We are committed to making a positive impact on people, society, and our planet through both our operations and the critical infrastructure we provide to connect the world.

## Renewed Focus on ESG Strategy

In 2024, we reinforced our ESG strategy by incorporating the results of the double materiality assessment (DMA). The DMA is designed to ensure that we take account of key internal and external stakeholder perspectives; underscore our increased focus on environmental initiatives; and position SES as a leader in the space sector. We have also undertaken a significant amount of work to align strategic direction and company growth with our ESG ambitions, identifying opportunities to increase our positive impact.

## Science-Based Targets and Renewable Energy Initiatives

This year, our greenhouse gas (GHG) emissions targets were validated by the Science Based Targets initiative (SBTi). This significant milestone highlights both our leadership credentials and our commitment to the latest climate science. 2024 also saw the completion of renewable energy projects at three of our largest energy-producing sites, expected to save over 97 tonnes of $CO_2e$ annually.

## Customer-Centric Sustainability

In 2023, we carried out the first industry-led Life Cycle Assessment (LCA) for a telecommunications satellite, the Astra 1P satellite to evaluate the environmental impact of a product throughout its life cycle. The assessment generated valuable input from stakeholders, which we have now integrated into our ESG strategy to reduce waste across the entire lifecycle of our products and operations.

## Final thoughts

As a powerful player in the satellite industry, SES is committed to working with our customers and partners to shape a more sustainable future. Together, we will continue to innovate and lead the way in creating a more sustainable and connected world.

**Adel Al-Saleh**
CEO

# OUR APPROACH

## OUR ESG STRATEGY

In 2021, we developed the SES Horizon ESG Strategy to align our operations to UN Sustainable Development Goals. Following the 2024 Double Materiality assessment, we started to refine the key topics that will shape the three pillars of our future strategy.

## 1. ENVIRONMENTAL: A CLIMATE-NEUTRAL FUTURE

### 1. Climate neutrality

- By 2030: Achieve a 50% reduction in absolute Scope 1 and 2 GHG emissions from our 2019 baseline.
- Increase the usage of renewable energy at key operational sites to minimise carbon footprint.
- Align with customers on their climate journey through reduction of our environmental footprint.
- Recognise the importance of environmental impact beyond GHG emissions.

### 2. Increased circularity

- Optimise the use of materials and energy across the lifecycle of our satellites, from design, manufacturing, launch operation and end- of-life disposal.
- Embrace eco-design principles to reduce waste and promote recycling.

### 3. Sustainable space environment

- Lead the space ecosystem by fostering responsible space practices, advocating and innovation in new technologies that ensure the long-term viability of space.

## 2. SOCIAL RESPONSIBILITY: A LEADING EMPLOYER DRIVING SOCIAL IMPACT

### 1. Connect the unconnected

- Maximise our impact as a critical infrastructure provider to the benefit of society.
- Continue to drive solutions and partnerships that bridge the digital divide and foster social and economic development as well as critical communications for disaster response.

### 2. Best workplace

- Build and maintain a diverse, inclusive, and safe workplace.
- Provide continuous learning and development opportunities that empower our employees and support their career growth.

## 3. GOVERNANCE EXCELLENCE: EMBEDDING ESG BEST PRACTICES

**1. Ethical Practices**
- Uphold the highest standards of integrity, transparency, and accountability in all our operations.
- Ensure compliance with all relevant laws and regulations.

**2. Stakeholder Engagement**
- Maintain open and proactive communication with our stakeholders, including customers, employees, investors, and regulators.

- Incorporate feedback into our ESG strategy and decision-making processes.
- Identify and collaborate with industry peers, governments, customers and stakeholders to increase impact.

**3. Risk Management**
- Implement robust risk management frameworks to identify, assess, and mitigate ESG-related risks.
- Regularly review and update our policies.

# PREPARING FOR THE CORPORATE SUSTAINABILITY REPORTING DIRECTIVE
## ESRS 2 BP1, BP2

The sustainability statement has been prepared on a consolidated basis, aligning with the scope of our financial statements. The statement covers both upstream and downstream value chain activities. This includes our suppliers, own operations and use of our products by customers. This provides a comprehensive view of our sustainability performance across the entire organisation.

### Justification for Alternative Time Horizons
In preparing our sustainability statement, we have opted to use alternative time horizons instead of those defined in ESRS 1.

- Short term (12 months)
- Medium Term (2030)
- Long Term (2050)

These Medium and Long term horizons have been set to mirror the timelines used in SES's strategic planning and capital investment decisions.

### Disclosures Stemming from others accepted standards
Following regulatory changes, our Sustainability statements have been prepared with reference to the European Sustainability Reporting Standards (ESRS) and the EFRAG guidelines. As such, this report aligns with globally recognised frameworks, including TCFD climate-related financial disclosures, and UN Global Compact principles. It also includes disclosures that are aligned with EU Taxonomy regulations.

# GOVERNANCE ESRS 2 GOV-1, GOV-2, GOV-3, GOV- 5

ESG is incorporated into the corporate governance structure with key ESG issues being discussed with senior management and committees of the Board of Directors. The full description of the role of management and supervisory bodies as well as the topics addressed can be found in the "Corporate Governance" section of the annual report.

**Composition of the Board**

Our Board of Directors includes both executive and non-executive members, ensuring a balanced approach to governance. Employees and other workers are represented within our governance structure, contributing to diverse perspectives. The members possess extensive experience relevant to the satellite industry, including sectors, products, and geographic locations. The Board's gender diversity is calculated as an average ratio of female (40% in 2024) to male board members (60% in 2024). The percentage of independent board members is 60%.

The Board of Directors, along with specific committees such as the Audit and Risk Committee (ARC), oversees impacts, risks, and opportunities related to sustainability. The Audit and Risk Committee operates under a charter established by the SES Board, which is also part of the company's corporate governance charter. Both charters are publicly accessible on the company's website.

The Chief Executive Officer (CEO) directs the ESG strategy, with execution responsibilities delegated to the Director of Social and Environmental Impact, who reports to the Chief Legal Officer. This ensures integration into the company's direction and strategy. Management's role includes monitoring, managing, and overseeing impacts, risks, and opportunities, involving dedicated controls and procedures integrated with other internal functions. The Board and senior executive management oversee the setting of targets related to material impacts, risks, and opportunities, and monitor progress towards these targets.

Other senior members of the leadership team are given targets and activities associated with the strategy for execution. The Chief Product and Innovation officer is responsible for execution of circularity in our products. The Chief Financial officer is responsible for alignment of ESG targets with business planning and risk management integration of ESG risks as well as supply chain sustainability targets. The Chief Technology officer has responsibility for GHG emission reduction initiatives in scope 1 and 2 of our facilities. The Chief Commercial officer has responsibility for integrating ESG values into customer requirements and markets. The Audit and Risk committee gets quarterly updates on the ESG strategy and the entire board gets periodic updates on the progress against the strategy ambitions.

The Board and management bodies possess or have access to sustainability-related expertise, leveraging external experts and providing training to ensure appropriate skills are available.

Senior leadership's incentive packages include targets for GHG emissions (scope 1 & 2). Performance measures include energy efficiency projects, renewable energy installations, and biogas usage. Performance Metrics in Remuneration Policies: Strategic Business Objectives (SBO) make up 30% of the SES Bonus Plan and SLT Bonus Plan, with one of the five SBOs being a sustainability target. Each SBO is measured against its KPI, and the combined achievement percentage is weighted at 30%, added to the company performance level (CPL) which makes up the other 70% of the bonus. More information on the renumeration can be found in the renumeration section.

The company has a dedicated Internal Audit function and ESG team. The Board approves the annual internal audit plan, which is reviewed by the ARC. The ESG team reports to the ARC on progress in ESG matters.

Further information can also be found in the Board of Directors and Committees and the Internal Control procedure sections.

**Statement on due diligence** [GOV-4]

| Core elements of due diligence | Sections |
|---|---|
| a) Embedding due diligence in governance, strategy and business model | Governance; Board Governance Structure & Committees; Double materiality ; Material impacts, risks and opportunities sections |
| b) Engaging with affected stakeholders in all key steps of the due diligence | Interests and views of Stakeholders; Double materiality; Engaging with our own workforce |
| c) Identifying and assessing adverse impacts | Double materiality ; Material impacts, risks and opportunities sections |
| d) Taking actions to address those adverse impacts | Actions sections |
| e) Tracking the effectiveness of these efforts and communicating | Remediation and raising concerns |

# STRATEGY

## Strategy and Sustainability [ESRS 2 SBM-1]

SES' core business is providing content and connectivity on a global basis via satellites. We operate across all major regions, providing satellite broadcast services and connectivity in under connected areas. Our major customer market segments are Government, Aviation (in flight connectivity services), Cruise ships, Telecommunications providers and TV Broadcast. SES operates in a B2B model serving businesses, governments and NGOs.

SES' major sustainability goals are divided into Environmental, Social and Governance goals that apply to our entire global operation. For Environmental, SES has a NetZero by 2050 target along with near-term targets for scope 1 & 2 for a 50% decrease in emissions before 2030. These are validated by SBTi. Additionally, we have a goal to incorporate eco-design and circularity principles into our products, services, and operations. Lastly, in the Environmental area SES is striving to be a leader in sustainability not only on earth but in our space environment by advocating and implementing industry leading operations practices for safe access to space. The products and services we provide as well as the customers that use these products are all impacted and impact the progress of these goals. Our supply chain is critically affected by these goals as we will be asking for their participation and partnership in achieving the adoption of circularity principles.

For social, SES has goals related to our workforce to increase the representation of women in leadership position. We also focus our efforts on maximising the use of the critical infrastructure we provide to benefit the planet. The communities where we operate as well as our employees are impacted by the goals we have related to Diversity and inclusion. Our customers, are impacted by our efforts to maximise the use of our infrastructure because at our core we are providing connectivity and have an opportunity to partner with them in close alignment for projects that align with the SDGs and benefit the planet.

In governance, our goals currently revolve around increased transparency and accountability of ESG into our operations and with our stakeholders. The ESG strategy was developed and incorporated into the overall company strategy including consideration of our value chain, stakeholder interests, governance structure, and management of specific material ESG risks, impacts and opportunities. The details of which can be found in the "Operational and strategic" section of the annual report as well as detailed in the ESG section. References are below.

## Interests and views of stakeholders [ESRS2 SBM- 2]

SES recognises the importance of engaging with its key stakeholders, which include employees, shareholders, investors, customers, suppliers, corporate partners, industry associations, NGOs, civil society, government, and academia. The frequency and forms of engagement vary according to the stakeholder category, with interactions occurring at least annually. For some stakeholders, such as customers and suppliers, engagement is more frequent

and predetermined, while for others, it is on an occasional basis.

Each department within SES is involved in the engagement process, depending on the stakeholder category. This engagement aims to monitor performance, provide transparency, ensure that our values are respected within our value chain, and meet the expectations of society, employees, customers, and investors. It also fosters collaborations with other industry players, government bodies, and academia. The outcomes of these engagements are considered when defining the company strategy and prioritising projects. This information is also shared internally and in our annual report to ensure transparency with both internal and external stakeholders.

Key stakeholders, corresponding purposes and means of engagement methods include:

## Stakeholder engagement table

| | | How engagement is organised | Topic | Purpose of Engagement | Examples of outcomes from the engagements |
|---|---|---|---|---|---|
| | **Employees** | • Representative Partners meetings<br>• Surveys<br>• Company-wide and local meetings<br>• Internal Communication Channels<br>• Personal development sessions | • Working Conditions<br>• Health and Safety<br>• L&D<br>• Governance<br>• Sustainability | • Gather employee feedback and perspective<br>• Contribute to sustainable workplace and employee wellbeing | • Internal policies updates<br>• Action plan development<br>• Communications from management<br>• Sustainable initiative |
| | **Investors** | • Investors calls/emails/questionnaires<br>• ESG Ratings<br>• Conferences and in person visits | • ESG reporting | • Understanding expectations to sustainability<br>• Enhancing transparency | • ESG reporting<br>• Enhancement Roadmap<br>• Addressing investor queries |
| | **Customers** | • Net Promoter Score tool<br>• In person meetings<br>• Customer Advisory Board<br>• Respond to customers enquiries<br>• Forms and surveys<br>• Direct engagement with our sales representatives and customer management teams | • ESG<br>• Customer centricity | • Building trust<br>• Developing sustainable solutions<br>• Enabling customers to achieve their ESG targets | • Net Promoter Score<br>• Develop sustainable product and services<br>• Adapt strategy<br>• Customer centricity and ESG initiatives |
| | **Suppliers** | • Supplier due diligence activities<br>• Workshops<br>• Surveys | • ESG | • Compliance with our code of conducts<br>• Promoting responsible sourcing, incl. of minerals and metals<br>• Promoting human and labour rights of workers<br>• Decarbonising our supply chain | • Supplier improvement plans<br>• Inform suppliers selection<br>• GHG emissions reduction initiatives |
| | **Industry and Sustainability Associations** | • Joint initiatives and programmes<br>• Workshops<br>• Webinars<br>• Conferences | • ESG<br>• Space Sustainability | • Enabling the industry to engage policymakers<br>• Developing industry standards on sustainability<br>• Knowledge sharing<br>• Collaboration | • Alignment on sustainability practices and measurement standards<br>• Industry wide Sustainability initiatives |
| | **NGOs and Civil Society** | • Partnerships with NGOs<br>• Call for tenders | • ESG<br>• Space sustainability<br>• Digitalisation for Development | • Contributing to local initiatives<br>• Provide connectivity to remote areas | • Site-specific initiatives on e.g. on community development, Space sustainability initiatives |
| | **Government, Policy Makers and Regulators** | • Direct dialogue with policymakers<br>• Answering public consultations<br>• White papers, programmes, and studies | • ESG<br>• Space Sustainability | • Ensuring regulatory compliance<br>• Promoting sustainability<br>• Ensure Technology inclusive decision making | • Inform decision–making |
| | **Academia and Research Institutes** | • Contributions to research projects<br>• Capacity building initiatives | • ESG<br>• Space Sustainability | • Research and Innovations<br>• Knowledge sharing<br>• Capacity building | • Student programmes<br>• Research projects |

In 2024, SES conducted a Double Materiality Assessment (DMA), engaging representatives from all main stakeholder groups. The outcome of these conversations was used to define our materiality matrix and identify topics relevant to both our operations and stakeholders. For more information on the DMA and the priority-topics identified you can refer to the Double Materiality Assessment section below.

Considering the outcome of this assessment, SES's strategy and business model may be affected as follows:

- **Environmental Strategy:**
  Adopting greener practices to reduce Scope 3 emissions, focusing on sustainability and eco-friendly products, and managing and reducing direct emissions to align with global standards.

- **Operational Strategy:**
  Enhancing resilience to climate impacts by investing in robust infrastructure and disaster recovery plans, and implementing efficient resource use and sustainable practices in manufacturing.

- **Supply Chain and Resource:**
  Management Strategy: Ensuring ethical practices and compliance in the supply chain, developing efficient compliance strategies, and minimising environmental impacts by adopting sustainable practices.

# DOUBLE MATERIALITY ASSESSMENT

In 2024, we updated our reporting in anticipation of the new CSRD and ESRS standards. As a result, we conducted our first Double Materiality assessment (DMA) in partnership with external consultants following EFRAG guidelines and best practices. The process involved evaluating our sustainability topics from a dual perspective:

- **Financial Materiality (Outside-In Impacts):** Examining how social, environmental, and governance factors may affect our business and financial performance.
- **Impact Materiality (Inside-Out Impacts):** Assessing our company's influence on society and the environment, including human rights and other relevant aspects.

The DMA integrates sustainability into our strategic decision-making, ensuring our policies, action plans, metrics, and targets consider both financial and environmental/social factors. We initiated an inside-out impact assessment of SES's effects on the environment and society, building on previous evaluations of sustainability impacts within our operations and value chain, and consulting internal experts. Additionally, we conducted an outside-in financial assessment of the sustainability-related risks our business faces. While we aimed to quantify these impacts where possible, we often had to rely on qualitative assessments. We followed a five-step approach throughout this process.

**IMPACT MATERIALITY** inside-out

**FINANCIAL MATERIALITY** outside-in

SES
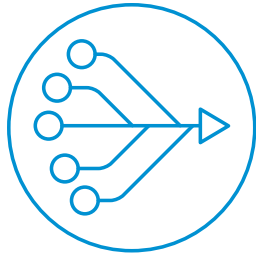
# 5 STEPS OF THE DOUBLE MATERIALITY ASSESSMENT
## ESRS IRO 1

In alignment with the European Sustainability Reporting Standards (ESRS), we have implemented a comprehensive process to identify and assess material impacts, risks, and opportunities (IRO).

### Scope and assumptions

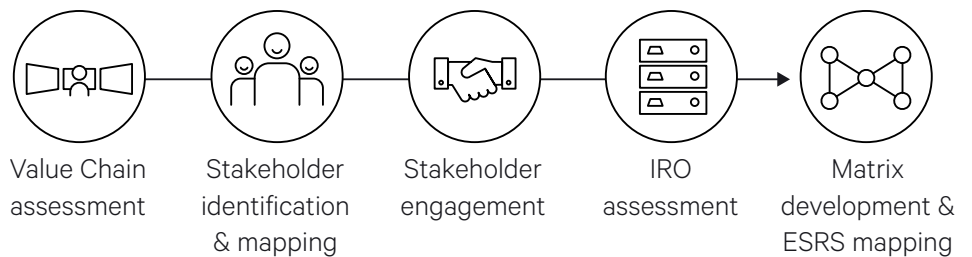In our own operations, we evaluated our impact on people and the environment. Additionally, we assessed our value chain impacts and risks, primarily focusing on upstream activities in reason of our business model. These assessments were based on internal knowledge, desk research and when possible validated through additional external engagement. They focused mainly on our first-tier suppliers and customers.



| Value Chain assessment | Stakeholder identification & mapping | Stakeholder engagement | IRO assessment | Matrix development & ESRS mapping |

DMA Process

## Step 1: Assess Value Chain / Business context

In order to analyse the sustainability environment from the perspective of our business model, value chain, and stakeholders as well as allowing us to identify significant impacts, risks, and opportunities , we collected quantitative and qualitative data from various sources, including internal reports, industry benchmarks, and stakeholder feedback.

### Internal Sources:
- Internal Documentation Review:
  Analyse relevant documents, policies, impact reports, previous materiality assessments, and stakeholder findings through desk research, gap analysis, interviews, surveys and questionnaires.
- Internal Stakeholder Outreach:
  Consult with responsible individuals in key business areas, management, and employees.

### External Sources:
- ESG Regulatory Landscape:
  Analyse global ESG standards as well as legal and regulatory obligations in our key operational regions.
- ESG Benchmark:
  Compare the materiality topics identified by industry peers and key leaders in the Telecom/Aerospace sector.
- Analysts and Investors:
  Identify expectations from investors and ESG rating analysts such as MSCI, S&P, and Sustainalytics, among others.
- ESG Report Analysis:
  Assess the sustainability reports of key value chain actors.
- Sectoral Reports:
  Identify global, sectoral, and specific sustainability trends, challenges, and risks relevant to our business model.
- External Stakeholder Outreach:
  Engage with key stakeholders via interviews, surveys, and questionnaires to identify material topics.

## Step 2: Identify Material Impacts, Risks and Opportunities (IRO)

Based on these findings, we developed an initial inventory of relevant topics and subtopics. This inventory was then validated and updated through a series of stakeholder engagement activities.

## Step 3: Engage Stakeholders <sup>ESRS 2 IRO/SMB-3</sup>

We engaged with a wide range of stakeholders, including employees, customers, suppliers, investors, and community representatives. This exercise was essential to gather the data that allows us to identify all real and potential impacts, risks and opportunities of our operations.

While we did not directly consult with affected stakeholders to understand the impact of our business activities on them, we did consult other external stakeholders, such as associations and sustainability industry groups. We relied on their insights to gain a comprehensive understanding of the interests and views of affected stakeholders.

**Stakeholder Outreach**



## Step 4: Assessment Methodology and Approach <sup>ESRS 2 IRO-1</sup>

In this step, we used various criteria to assess both impact and financial materiality, allowing us to identify and prioritise the material actual and potential impacts, as well as the material risks and opportunities.

involves reviewing a list of potential material risks and opportunities and applying a set of objective thresholds for likelihood and magnitude, while also considering the nature of the financial effects of the identified risks and opportunities.

**Financial materiality Assessment**
For financial materiality, we reviewed the ESRS longlist of topics deemed material based on our 2021 materiality assessment and benchmarking results from 2024. We conducted a top-down exercise to identify SES's key sustainability-related dependencies, risks, and opportunities. This process involved engaging with internal stakeholders from the Risk and Finance functions. To evaluate financial materiality, we applied qualitative thresholds considering financial effects on performance and business impact. In the future, we plan to explore incorporating quantitative thresholds as well.

Finally, the company assessed sustainability risks and opportunities based on their likelihood of occurrence and the potential magnitude of their financial effects in the short-, medium-, and long-term. This

**Impact materiality Assessment**
Methodology and Assumptions:
To assess the nature and severity of potential impacts, we categorise impacts on a scale of one to four based on their scale, scope, and irremediable character. For negative impacts, we considered scale, scope, and irremediable character. For positive impacts, we assessed scale and scope. For both positive and negative impact we also assessed the likelihood of occurrence and mapped it to a time horizon (Short, Medium, Long term).

- **Negative Impacts:**
  - Very High (4): Critical effects with widespread impact, impossible to repair.
  - High (3): Relevant effects, extended scope, low repair potential.
  - Moderate (2): Limited effects, localised scope, recoverable damage.

○ Low (1): Minimal impact, minor scope, and fully recoverable damage.

- **Positive Impacts:**
  ○ Very High (4): Trend-changing benefits with widespread positive impact.

○ High (3): Relevant benefits with extended impact.
○ Moderate (2): Small, localised benefits.
○ Low (1): Minimal benefits in a minor or non-relevant area.

## Step 5: Determine of material topics

During the desk research and preliminary consultations over 100 material topics were identified. To facilitate the assessment, these topics were grouped based on similarities, and stakeholder feedback. This process resulted in a list of sustainability topics that form our long list of IROs.

All the IROs on this list were then verified and supplemented through key stakeholder engagements, All IROs were scored, and workshops inputs was aggregated to calculate the 'degree of materiality' across 4 levels (low, moderate, high and very high). Participants validated the preliminary results, and further

calibration was conducted before finalising the impact assessment.

Consolidated overviews of sustainability-related topics were presented to and discussed with the Board and management. As agreed with them, the materiality thresholds were set at 'high' or above. This means that impacts and risks scored as 'high' or above, along with their associated ESRS topics, are deemed material.

This process yielded a final list 10 material impacts assessed as 'high' or above, that you can see represented in the Matrix below.
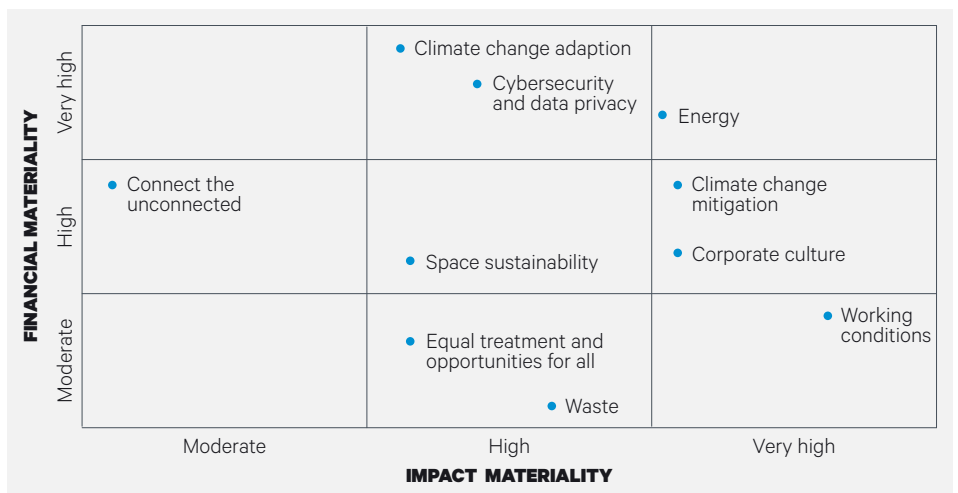


**Materiality Matrix** ESRS 2 IRO 2

Our materiality matrix visually represent the most significant ESG topics for SES.
- The X-axis shows the financial impact of each issue on our business.
- The Y-axis indicates the importance of these topics to our stakeholders.

- Topics in the top-right quadrant are of high importance to both your business and stakeholders, making them top priorities.
- Topics in the top-left quadrant are highly important for the business but less impactful to stakeholders.

**Material Topics Reference Table**
The material IROs and relevant topics will be presented in their respective sections and pages of this report. Please refer to the table below.

| Material Topic | Relevant Section |
| --- | --- |
| Working Conditions | Own Workforce |
| Corporate culture | Governance |
| Climate Change Mitigation | Climate Action |
| Energy | Climate Action |
| Waste | Resources Use and Circular Economy |
| Cybersecurity and data privacy | Cybersecurity |
| Equal treatment and opportunities for all | Own Workforce |
| Space sustainability | Environment |
| Climate Change Adaptation | Climate Action |
| Connect the unconnected | Connecting the Unconnected |

# ENVIRONMENT

The environmental aspect of our ESG strategy covers both our operations in space and our impact on earth. We continuously progress our actions to meet internal targets and drive progress within the industry as a whole.

# SPACE SUSTAINABILITY

SES has long prioritised safe satellite operations and routinely enhances safety through improved satellite, hardware and software design.

**Material Impacts and Risks**

The importance of space sustainability has significantly increased over recent years. Space plays a crucial role in addressing some of earth's most pressing challenges, from communications to environmental monitoring and scientific research. However, this growing use has resulted in increasing concerns: such as the rapid deployment of satellites across various orbits, which has heightened the risk of space debris. Our first materiality assessment identified space sustainability as a material topic in 2021 – and the 2024 DMA underscored this importance.

**Positive Impact: Space Sustainability**

As SES implements its space sustainability initiatives, we anticipate several positive impacts. This programme is expected to result in improved environmental impact and operational performance. By fostering sustainability within the space sector, SES can enhance stakeholder trust and demonstrate leadership in responsible space operations. Extending space sustainability-related initiatives to our value chain could further improve sustainability and reduce risks, benefiting both SES and our partners.

We are committed to driving innovation and fostering responsible space practices to ensure the long-term sustainability of space.

**Risk: Safe space operations**

A safe space environment is a critical factor for our operations. Ensuring consistent best practices among space operators limits the risk to operational disruptions and increased costs.

**Approach and Policies**

SES has long prioritised safe satellite operations and routinely enhances safety through improved satellite, hardware and software design. We work to improve communications and share essential space data among satellite operators. And we have set up a dedicated team to address significant sustainability topics on a national and international level.

Different orbits present unique challenges for sustainability and require tailored strategies. We work closely with industry stakeholders, national and regional governments, and international organisations to develop strategies and best practices that promote a sustainable space environment.

**Actions**

In 2024, SES continued to focus on innovation, safety, and sustainability in satellite design and operations. We worked with satellite manufacturers to make our satellites more resilient and reduce the risk of space debris. As a leader in satellite operations, we effectively used our satellites in different orbits and pioneered safe practices for satellite placement and decommissioning.

In addition, we supported a range of initiatives such as Aldoria for earth-based tracking, and the Space Data Association (SDA). As for space traffic management, we await the outcomes of the Space Sustainability Rating for O3b mPOWER. In the meantime, we continued to work with partners to optimise resource allocation in large satellite constellations – our initiative with the Massachusetts Institute of Technology being one notable example.

Our coordination with entities such as the SDA, Combined Space Operations Centre (CSpOC), and EU Space Surveillance and Tracking (EU-SST) ensures we are comprehensively involved in space traffic management.

We continued to prioritise reliable disposal equipment; complete passivation of stored energy at end-of-life; and manoeuvrability during operation to ensure safe satellite disposal. At the end of 2023, we completed a Life Cycle Assessment (LCA) on Astra 1P: this resulted in new targets for incorporating eco-design principles at various levels (as detailed in the Circular Economy section of this report).

**Future Actions**

To underscore our position as a leader in sustainable space practices, we collaborate with the European Space Agency on Life Cycle Assessment (LCA) as part of their Eco-design working group, contribute to the European Commission's Product Environmental Footprint Category Rules (PEFCR) initiatives for the space industry; and invest in sustainability-related projects.

**Targets**

As part of our commitment to driving innovation and fostering responsible space practices, we aim to obtain a space sustainability rating across all SES systems.

To this end, we are developing a coordinated strategy focused on orbital debris mitigation, space traffic management, RF spectrum, and orbit management. Other goals include circularity targets, accountability to the space environment, and operational risk management. We actively work with international regulators and governments to advocate for responsible space practices. And we develop partnerships to innovate solutions that drive sustainability, set industry standards, and ensure the long-term viability of space.

# CLIMATE ACTION

Climate change presents both challenges and opportunities for SES, and the company is proactively addressing these through comprehensive decarbonisation strategies, regulatory alignment, and responsible resource management.

## INTRODUCTION

SES is committed to integrating environmental responsibility into its long-term business strategy, ensuring that sustainability is embedded across its operations and value chain. Climate change presents both risks and opportunities for SES, and the company is proactively addressing these through comprehensive decarbonisation strategies, regulatory alignment, and responsible resource management. By implementing science-based targets, SES aims to minimise its environmental footprint while maintaining operational efficiency and business resilience.

SES's environmental strategy is built on three fundamental pillars: emissions reduction, renewable energy adoption, and supply chain sustainability. The company has set ambitious GHG Scope 1 & 2 reduction targets, transitioning its facilities to cleaner energy sources and engaging with suppliers to drive sustainability across the value chain.

These efforts align with international climate goals and reinforce SES's commitment to supporting the global transition toward a low-carbon economy.

Beyond direct emissions reductions, SES integrates climate scenario analysis into its decision-making to anticipate and mitigate risks associated with regulatory changes, market shifts, and environmental impacts. Transparent reporting remains a key aspect of SES's environmental strategy, ensuring that stakeholders have a clear understanding of progress, challenges, and future initiatives.

This section provides an overview of SES's environmental performance, including key initiatives, and strategic priorities for the coming years. By continually strengthening its environmental commitments, SES aims to contribute meaningfully to the industry's sustainability transformation and broader climate objectives.

## GOVERNANCE

ESG is incorporated into the corporate governance structure with key ESG topics being discussed with senior management and committees of the Board of Directors.

The full description of the role of management and supervisory bodies as well as the topics addressed can be found in the Corporate Governance section of the annual report.

## STRATEGY

**Transition plan** ESRS E1-1
SES is developing a transition plan to guide its sustainability efforts and incorporating Science-Based Targets

initiative (SBTi) commitments. SES aims to mitigate climate-related risks and support global decarbonisation efforts.

**SES Climate Commitments, namely:**

By 2030: Achieve a 50% reduction in absolute Scope 1 and 2 GHG emissions from our 2019 baseline. Investments in energy efficiency, renewable energy, and electrification will play a central role in reaching this goal.

This section of the annual report details SES's transition plan, outlining key objectives, strategic pillars, and performance management frameworks that underpin its environmental commitments.

**GHG Emission Reduction Targets**

In 2024, SES submitted its science-based targets (SBTi), which were validated in October of the same year. These targets reinforce our commitment to aligning with the latest climate science and contributing to the global effort to limit temperature rise. Our Scope 1 and 2 reduction goals follow a 1.5°C pathway, ensuring that SES actively reduces its direct and indirect emissions in line with international climate targets.

**Our Climate Commitments**

By 2030: Achieve a 50% reduction in absolute Scope 1 and 2 GHG emissions from our 2019 baseline. This commitment is integral to SES's sustainability strategy, ensuring operational efficiency improvements while transitioning toward low-carbon technologies. Investments in energy efficiency, renewable energy, and electrification will play a central role in reaching this goal.

**Strategic Pillars & Key Actions**

To achieve these targets, we have identified several key strategic pillars, including:

| Strategic Pillars | Key actions |
|---|---|
| Energy Efficiency | Energy efficiency is a core component of SES's transition strategy and represents one of the most significant material topics facing our organisation, driving both emissions reductions and operational resilience through the reduction of baseline energy consumption while enhancing efficiency across the infrastructure.<br><br>• **Reduction of Baseline Consumption**: SES optimises energy use and through targeted efficiency upgrades in operations.<br>• **Technology-Driven Enhancements**: Investments in energy-efficient cooling systems and LED retrofitting ensure long-term reductions in energy intensity and operational costs.<br><br>In 2024, several actions were implemented across several facilities, including the deployment of LED programme energy saving leading to estimated annual savings of **120 MWh / 45 tCO$_2$eq** emissions, or the optimisation of HVAC leading to estimated annual savings **300 MWh / 108 tCO$_2$eq** emissions. |
| Decarbonisation of Operations | On-site renewable, Solar PV in particular, is a critical pillar of SES transition strategy, and represents a critical enabler driving long-term cost savings while reducing potential exposure to energy price volatility and strengthen alignment with global decarbonisation targets.<br><br>In 2024, several Solar PV projects were implemented, across several facilities leading to estimated annual savings of **961 MWh / 97 tCO$_2$eq** emissions. |
| Supply chain collaboration | Supply chain collaboration and visibility are critical for SES to achieve its climate goals. In 2024, SES launched a broader supplier engagement initiative to enhance sustainability performance across its value chain. As part of this effort, SES has drafted a sustainability supplier scorecard to assess supplier performance on key environmental criteria and inform sourcing decisions. This internal framework is still in development, with no external reporting planned until the next reporting cycle. |

# CLIMATE RELATED MATERIAL IMPACTS, RISKS AND OPPORTUNITIES ESRS 2 SBM-3

**TCFD climate-related risks and opportunities**

SES uses the TCFD's recommendations to categorise, manage and report on its climate-related risks and opportunities.

Thus, physical risks, transition risks and climate related opportunities regarding SES activities have been assessed and uses the following TCFD risks categories for managing and reporting.

| Physical Risks | Transition Risks | Opportunities |
|---|---|---|
| • Acute<br>• Chronic | • Reputational<br>• Market<br>• Policy and legal<br>• Technology | • Product and Services<br>• Market<br>• Resource efficiency<br>• Resilience |

## Climate related Transition Risks mapping

**Reputational:** A proactive decarbonisation strategy associated with robust, transparent disclosures are critical to meeting stakeholder expectations and regulatory requirements.

- **Emission from Operations:**
  SES operations, particularly satellite ground stations and data centres, are energy intensive. Stakeholders, including customers, investors, and regulators, are increasingly scrutinising the carbon footprints of companies in the telecommunications sector. Failure to demonstrate a robust and transparent decarbonisation strategy aligned with science-based targets ("SBT") could lead to potential reputational damage, lost contracts, and difficulty in attracting ESG-focused investors.

- **Current Disclosure:**
  As reporting frameworks become more stringent, any gaps in SES sustainability disclosures could lead to negative perceptions among stakeholders. Inadequate disclosures might be interpreted as a lack of commitment to sustainability, potentially resulting in loss of trust from customers, partners, and financial institutions.

**Market:** Market alignment with ESG expectations will ensures adaptability and leadership in a low-carbon economy while maximising customer retention.

- **Change in Investor Expectations:**
  Investors are moving toward portfolios that prioritise ESG compliance and impact. SES must align with these expectations by demonstrating measurable progress in reducing emissions, adopting renewable energy solutions, and enabling sustainable technologies. Failure to do so could lead to divestment, reduced access to capital markets, or lower valuation.

- **Insurance Costs:**
  Transition risks associated with higher insurance deductibles and lower coverage have been identified. Climate-related events increase operational uncertainties, making assets more expensive to insure.

- **Low Carbon Competition:**
  Competitors offering low-carbon, energy-efficient satellite services or using green launch solutions may gain a competitive edge. SES risks losing market share if it cannot

*Investors are moving toward portfolios that prioritise ESG compliance and impact. SES must align with these expectations by demonstrating measurable progress in reducing emissions, adopting renewable energy solutions, and enabling sustainable technologies.*

differentiate its products as both sustainable and efficient.

- **Change in Customer Demand:**
  Demand for sustainable satellite services is rising as customers seek to decarbonise their own value chains. This is particularly relevant in industries like aviation and maritime, which are under pressure to reduce emissions and may require sustainable connectivity solutions.

**Policy and Legal:** Proactive compliance mitigate risks and ensures operational continuity

- **Carbon Pricing:**
  The introduction of carbon pricing mechanisms across SES global operations could significantly increase costs. For example, energy-intensive ground operations or supply chains reliant on fossil fuels could face higher operating expenses. Moreover, variability in carbon pricing regulations across different regions adds complexity to compliance and financial forecasting.

- **Emerging Regulations and Disclosure Requirements:**
  New regulations such as the CSRD demand comprehensive, auditable, and forward-looking disclosures.

SES may face resource constraints in meeting these requirements, particularly in collecting and verifying data across its global operations. Non-compliance with these emerging standards could lead to financial penalties, reputational risks, and diminished stakeholder trust.

- **Fossil fuel dependency:**
  SES's reliance on fossil fuels for certain operations exposes the company to price volatility and increasing regulatory constraints, such as carbon taxes and fuel bans, which could significantly elevate operating costs and necessitate accelerated transitions to alternative energy sources.

**Technology:** Securing sustainable materials is necessary for SES operational resilience

- **Resource Availability:**
  SES operation of satellites depends on critical raw materials such as rare earth metals. Increased demand for these materials across industries, coupled with supply chain disruptions due to geopolitical or environmental factors, could drive up costs and delay projects. The ability to source sustainable and ethically produced materials will become a key differentiator.

## Climate Related Physical Risks mapping

**Physical Risks:** Climate resilience infrastructure secures operations against acute and chronic physical risks

- **Acute:** SES ground stations, data centres, and manufacturing facilities are exposed to extreme weather events such as hurricanes, floods, and wildfires. For instance, a major flood could disrupt critical infrastructure, resulting in service outages and significant repair costs. Similarly, wildfires near key locations could endanger assets

and require expensive emergency responses.

- **Chronic:** Long-term climate changes, such as rising temperatures and sea levels, could pose operational challenges for SES. Higher temperatures may impact the efficiency of cooling systems at data centres, increasing energy costs. Rising sea levels could threaten ground stations located in coastal regions, necessitating expensive relocation or infrastructure modifications.

> Upgrading SES facilities with energy-efficient technologies, can significantly reduce operational costs while cutting emissions. These initiatives demonstrate SES leadership in operational excellence.

## Climate Related Opportunities mapping

**Products and Services:** Sustainable products and services drives competitive differentiation and customer loyalty

- **Product Life Cycle Management:** By adopting a cradle-to-grave approach to product design and development, SES can reduce resource waste, increase efficiency, and align its offerings with circular economy principles. This not only reduces environmental impacts but also strengthens customer trust in SES commitment to sustainability.

- **Low Carbon Services:** Offering low-carbon satellite solutions positions SES as a leader in sustainable telecommunications. Services such as energy-efficient connectivity for remote operations, green mobility solutions, and IoT for smart infrastructure provide competitive advantages while meeting customer demands for sustainable offerings.

**Market:** A climate-conscious market strategy associated with reliable connectivity during crises solidifies SES role as a critical partner to unlocks growth and financing opportunities

- **Lower Insurance Costs:** By improving the climate resilience of its operations and infrastructure, SES can negotiate lower insurance premiums. Proactive risk management through robust disaster mitigation plans and infrastructure upgrades demonstrates SES commitment to reducing vulnerabilities, which is attractive to insurers.

- **Green Financing:** SES can access green financing instruments, such as green bonds and sustainability-linked loans, to fund innovative projects and infrastructure upgrades. These mechanisms often come with favorable terms and signal to investors SES dedication to long-term sustainability.

- **Increase of Market Share:** As industries and governments emphasise decarbonisation, SES can increase market share by offering tailored solutions that align with their goals. For example, SES can position itself as the preferred connectivity provider for sectors like aviation, maritime, and renewable energy.

- **Extreme Weather Events:** SES ability to provide reliable connectivity during extreme weather events is a key opportunity. As climate risks increase globally, SES's solutions for emergency response and disaster management can drive revenue growth while demonstrating social impact.

**Resource Efficiency:** Investing in renewable and energy efficiency projects enhance energy security, reduce costs and drive operational excellence

- **Building Energy Efficiency:** Upgrading SES facilities with energy-efficient technologies, such as LED lighting, advanced cooling systems, and smart energy management solutions, can significantly reduce operational costs while cutting emissions. These initiatives demonstrate SES leadership in operational excellence.

- **Renewable Energy:** Transitioning to renewable energy sources, such as solar or wind, for SES's ground stations and data centres reduces dependency on fossil fuels and shields SES from energy price volatility. Moreover, renewable energy adoption strengthens SES's sustainability narrative.

## Risks and opportunities impact analysis

SES has evaluated the likelihood of climate-related risks and opportunities materialising. Additionally, a preliminary internal assessment has been conducted to identify which risks might have the most significant impact in the future. These findings are summarised in the table below.

| Risks and opportunities mapping | Climate Scenario Time Horizon | | Financial Impact |
| --- | --- | --- | --- |
| | 1.5℃ | >4℃ | Most Important financial impacts before mitigation |
| **RISKS – PHYSICAL** | | | |
| **Acute** | | ▶▶▶ | ⊘ |
| **Chronic** | | ▶▶▶ | ⊘ |
| **RISKS – TRANSITION** | | | |
| **Reputational** | ▶▶▶ | | ⊘ |
| **Market** | ▶▶▶ | | ⊘ |
| **Policy and legal** | ▶▶▶ | | |
| **Technology** | ▶▶▶ | | |
| **OPPORTUNITIES** | | | |
| **Product and Services** | ▶▶▶ | ▶▶▶ | ⊘ |
| **Market** | ▶▶▶ | ▶▶▶ | ⊘ |
| **Resource efficiency** | ▶▶▶ | ▶▶▶ | |
| **Resilience** | ▶▶▶ | ▶▶▶ | |

▶▶▶ Short-term (12 months)

▶▶▶ Medium-term (2030)

▶▶▶ Long-term (2050)

## Resilience of Strategy and Business Model

SES is currently developing a resilience analysis to assess and mitigate climate-related risks across its operations and value chain, both upstream and downstream. The final analysis is expected to be completed next year. The scope excludes operations with negligible climate impact, enabling a targeted and impactful approach.

The methodology integrates climate scenario analysis aligned with the Intergovernmental Panel on Climate Change (IPCC) and International Energy Agency (IEA) frameworks. These analyses consider potential impacts in the short term, medium term, and long term, offering a comprehensive understanding of SES's exposure and adaptive capacity under varying climate conditions.

**Financial Effects and Mitigation Actions**
SES anticipates both direct and indirect financial effects from climate risks:

- **Anticipated Financial Effects:** Increased operational costs due to infrastructure upgrades, compliance measures, and investment in renewable energy projects.

- **Mitigation Actions:** Proactive initiatives include securing renewable energy PPAs, strengthening facility resilience, and integrating adaptive technologies into daily operations

# IMPACT, RISK AND OPPORTUNITY MANAGEMENT ESRS 2 IRO-1

Process for Identifying and Assessing Climate Impacts, Risks, and Opportunities

SES has established a comprehensive process to identify, evaluate, and address its climate-related impacts, risks, and opportunities. This process reflects SES commitment to sustainable operations and compliance with global climate frameworks, including TCFD and CSRD. The methodology is designed to incorporate main elements of the value chain while focusing on greenhouse gas ("GHG") emissions and other critical climate-related factors e.g. energy consumption, supply chain practices.

These include:
- **GHG Emissions Sources:** Analysing the origins and volumes of GHG emissions across Scopes 1, 2, and 3. This includes operational emissions (e.g., energy use at ground stations) and those generated by upstream suppliers and downstream customers.
- **Drivers of Climate-Related Impacts:** Identifying activities such as energy consumption, and supply chain practices that contribute significantly to SES's overall environmental footprint.

**Screening Activities and plans**
SES evaluates on a yearly basis its operations and value chain to identify and understand both current and potential climate-related impacts.

**Assessment Scope**
Based on TCFD climate related risks and opportunity categorisation, SES evaluation scope of the climate-risk identification exercise encompasses SES's entire value chain to ensure a holistic perspective, covering:

| | Upstream Suppliers | Internal Operations | Downstream use |
|---|---|---|---|
| **Value chain mapping** | Main suppliers covering six representative activities (IT, infrastructure, third party fiber capacity, video equipment and services, third party teleport services, TT&C) | Main direct activities and assets (teleports, satellite operation centres, offices) | Main client segments (video, mobility) assessment across several verticals (airline, cruise) |
| **Analysis granularity** | Site level assessments across its key operational regions spanning major continents | | |

This value-chain approach ensures the identification of risks and opportunities that are both material to SES and aligned with stakeholder priorities.

SES has established a comprehensive process to identify, evaluate, and address its climate-related impacts, risks, and opportunities.

SES leverages TCFD-aligned scenario analysis to assess climate-related risks and opportunities, ensuring informed decision-making.

**GHG Emissions Assessment**

SES employs detailed calculations of its carbon footprint, aligning with the GHG Protocol standards. This includes:

- **Scope 1:** Direct emissions from fuel and energy use in operations.
- **Scope 2:** Indirect emissions from purchased energy e.g. electricity consumption.
- **Scope 3:** Emissions from the broader value chain, such as supplier activities and customer usage.

**TCFD aligned Scenario Analysis**

The process integrates insights from scenario analysis, examining various climate scenarios (e.g., 1.5°C, and >4°C warming) to forecast potential future impacts and vulnerabilities based upon the Intergovernmental Panel on Climate Change ("IPCC") and the International Energy Agency ("IEA"). This ensures SES remains prepared for different climate futures and their operational implications.

This scenario analysis is to anticipated potential climate-related risks that may impact SES in the short-term ("ST", 12 months), medium term ("MT", ~2030) and long term ("LT", ~2050), so SES can work to mitigate and adapt to increase operational resilience.

The climate-related scenarios used in the analysis are described below:

| | |
|---|---|
| **1.5°C** | Aggressive mitigation, limiting warming to 1.5°C – Based on IPCC Assessment Report 6 (AR6) Scenario Shared Socioeconomic Pathway (SSP)1-1.9, RCP2.6 / IEA Net Zero Emissions by 2050 Scenario (NZE). |

This scenario depicts a world achieving net-zero global $CO_2$ emissions around 2050. Society transitions to sustainable practices, prioritising well-being over economic growth. Investments in education and health rise, while inequality decreases. Although extreme weather events become more frequent, the worst impacts of climate change are averted. This is the only scenario aligning with the Paris Agreement's 1.5°C warming limit, with temperatures peaking at 1.5°C before declining to 1.4°C by century's end.

| | |
|---|---|
| **>4°C** | Disorderly mitigation, warming exceeding 4°C – Based on IPCC Assessment Report 6 (AR6) Scenario Shared Socioeconomic Pathway (SSP) 5-8.5, RCP 8.5. |

This is the highest emission scenario and worst-case scenario in temperature increase, as outlined by the IPCC, involves a doubling of current $CO_2$ emissions by 2050. Rapid economic growth is fuelled by fossil fuels and energy-intensive lifestyles. The IPCC projects average global temperature to soar by 4.4°C by 2100.

**Scenario mapping with TCFD climate-related risks and opportunities**

The mapping of climate-related scenarios applied for the assessment of physical risks, transitions risks and opportunities is described below:

| | Physical Risks | Transition Risks | Opportunities |
|---|:---:|:---:|:---:|
| **1.5°C** | | ⊘ | ⊘ |
| **>4°C** | ⊘ | | ⊘ |

SES identifies climate-related hazards by conducting assessments aligned with high-emission climate scenarios, including frequent extreme weather events and long-term shifts in temperature and precipitation patterns.

**Integration Quantitative and Qualitative Assessments**

SES uses of internal data, sector benchmarks, and third-party databases (e.g., Copernicus, Climate Central) to analyse physical and transition risks. This multi-dimensional approach provides a robust foundation for identifying hotspots and prioritising mitigation efforts, and can be broke down as follow:

- **Physical Risks** are assessed quantitatively using climate-specific databases, such as Copernicus, Climate Central, Aqueduct, and CRT Climate. These tools enable a detailed evaluation of site vulnerability to climate hazards like flooding, heat stress, and storms, ensuring preparedness and resilience planning.

- **Transition Risks** are evaluated using quantitative insights from sector benchmarks, historical data, and TCFD-recommended frameworks. This ensures SES remains agile in responding to regulatory changes, market shifts, and evolving customer preferences.

**Identification of Climate-Related Hazards**

SES identifies climate-related hazards by conducting assessments aligned with high-emission climate scenarios, including frequent extreme weather events and long-term shifts in temperature and precipitation patterns. The analysis considers hazards affecting both upstream (supplier operations) and downstream (customer reliance on satellite services) value chain activities.

**Outputs of the Assessment**

The outputs of SES's climate impact assessment inform SES on climate related risks and opportunities and support in determining which IROs are material:

- **Impact Profiles:** Key sources of emissions and climate-related vulnerabilities are identified.
- **Climate Metrics:** Metrics such as carbon intensity and progress toward emissions reduction targets are tracked to ensure accountability and continuous improvement.
- **Priority Actions:** The assessment highlights critical actions needed to mitigate risks and capitalise on opportunities, from renewable energy adoption to supplier engagement programmes.

## Policies related to climate change mitigation and adaptation ESRS E1-2

Over the last few years, SES has been establishing the processes and procedures that reflect our environmental ambitions. In 2024, we developed a Global Environmental and Circularity Policy (GECP) based on risk management, governance, circularity and product sustainability, SBTi targets, and the material topics identified by the DMA.

## Actions and resources in relation to climate change policies ESRS E1-3

SES is developing an adaptation plan to address climate change policies and ensure alignment with regulatory and market expectations. This ongoing work includes assessing required actions and resource allocation to strengthen climate resilience across operations and the value chain. A comprehensive plan will be presented in the next reporting cycle.

# METRICS AND TARGETS

## Targets related to climate change mitigation and adaptation <sup>ESRS E1-4</sup>

By 2030: Achieve a 50% reduction in absolute Scope 1 and 2 GHG emissions from our 2019 baseline. This commitment is integral to SES's sustainability strategy, ensuring operational efficiency improvements while transitioning toward low-carbon technologies.

In 2024, SES submitted its science-based targets (SBTi), which were validated in October of the same year. These targets reinforce our commitment to aligning with the latest climate science and contributing to the global effort to limit temperature rise. Our Scope 1 and 2 reduction goals follow a 1.5°C pathway, ensuring that SES actively reduces its direct and indirect emissions in line with the most ambitious international climate targets.

**Our Climate Commitments:**
By 2030: Achieve a 50% reduction in absolute Scope 1 and 2 GHG emissions from our 2019 baseline. This commitment is integral to SES's sustainability strategy, ensuring operational efficiency improvements while transitioning toward low-carbon technologies. Investments in energy efficiency, renewable energy, and electrification will play a central role in reaching this goal.

| KPIs | Units | Target year | SBTi Objectives |
|---|---|---|---|
| **Scope 1&2 CO$_2$ eq emissions** | tCO2eq | 2030 | 50% absolute reduction versus 2019 baseline |

These commitments reflect SES's global presence across more than 75 countries and cover all relevant business activities within our operational scope. Through these efforts, SES is taking meaningful action to reduce its carbon footprint and contribute to the long-term resilience of the satellite communications industry.

## Gross Scope 1, 2 and 3 and Total GHG emissions <sup>ESRS E1-6</sup>

SES is committed to transparent reporting of its greenhouse gas (GHG) emissions in alignment with its science-based targets (SBTi) and global climate objectives. As part of its sustainability strategy, SES measures and reports its Scope 1, 2, and 3 emissions, ensuring alignment with best practices.

SES follows a structured approach to emissions accounting, integrating:
• Operational boundary definition in accordance with the GHG Protocol.
• Dual reporting of Scope 2 emissions using both market-based and location-based methodologies.

SES adheres to the following internationally standards:
• The Greenhouse Gas Protocol,

a Corporate Accounting and Reporting Standard (Revised Edition)
• Defra Environmental Reporting Guidelines, including streamlined energy and carbon reporting guidance (2021)
• The Greenhouse Gas Protocol Scope 2 Guidance

In this reporting cycle, SES has synchronised its financial and non-financial disclosures by reporting both 2023 and 2024 emissions, ensuring consistency in reporting from this cycle onwards.

**Gross Scope 1, 2 and 3 and total GHG Emissions**
SES tracks and manages its greenhouse gas (GHG) emissions across Scope 1, 2, and 3 to align with its climate commitments and reduction targets.

In 2024, total GHG emissions showed an overall increase compared to 2023, primarily driven by higher Scope 2 and Scope 3 emissions. While Scope 1 reductions helped, the rise in Scope 2 and Scope 3 emissions offsets these gains.

In 2024, total GHG emissions showed an overall increase compared to 2023, primarily driven by higher Scope 2 and Scope 3 emissions.

- **Scope 1** emissions decreased by -20.1%, reflecting ongoing efforts to optimise energy efficiency, transition to low-carbon alternatives, and improve operational processes.
- **Scope 2** emissions varied between location-based and market-based methodologies.
  - The location-based Scope 2 emissions increased by +10.8%, largely attributed to higher electricity consumption in specific locations where grid electricity has a higher carbon intensity.
  - The market-based Scope 2 emissions saw a smaller increase of +3.9%. This increase is linked to changes in residual grid mix emissions in specific locations.
- **Scope 3** emissions increased by +6.8%. The growth is primarily driven by capital goods and fuel and energy related activities, reflecting SES's business expansion and procurement activities.

As a result, total GHG emissions experienced a +5.4% increase (location-based) and +4.1% increase (market-based) year-over-year. While Scope 1 reductions helped, the rise in Scope 2 and Scope 3 emissions offsets these gains, leading to an overall increase in SES's carbon footprint.

| KPIs | 2023 | 2024 | 2024 vs. 2023 |
|---|---|---|---|
| **Scope 1** | | | |
| Gross Scope 1 GHG emissions | 9,799 | 7,826 | -20.1% |
| **Scope 2** | | | |
| Gross location-based Scope 2 GHG emissions ($tCO_2eq$) | 23,422 | 25,952 | +10.8% |
| Gross market-based Scope 2 GHG emissions ($tCO_2eq$) | 13,705 | 14,239 | +3.9% |
| **Scope 3** | | | |
| Gross Scope 3 GHG emissions ($tCO_2eq$) | 88,034 | 94,012 | +6.8% |
| **Total** | | | |
| **Total GHG emissions (location-based) ($tCO_2eq$)** | **121,255** | **127,790** | **+5.4%** |
| **Total GHG emissions (market-based) ($tCO_2eq$)** | **111,538** | **116,077** | **+4.1%** |

**Scope 3 GHG Emissions Inventory**

Scope 3 emissions account for a significant share of SES's total carbon footprint, driven primarily by Purchased Goods & Services and Capital Goods.

The following Scope 3 categories are included in SES's inventory:

- Purchased Goods & Services and Capital Goods remained the dominant contributors, increasing emissions by +6.5% due to higher infrastructure investments, offsetting the improvements made in procurement strategy and supply chain decarbonisation efforts.
- Fuel- and Energy-Related Activities emissions saw an increase of +50.4% due to higher overall energy consumption.
- Business travels emissions decreased by -20.7%, driven by continued remote work policies and optimised travel practices.
- Employee Commuting emissions decreased by -14.1%, reflecting hybrid work adoption.
- Upstream Transportation & Distribution emissions decreased by -10% reflecting logistical efficiency improvements.
- Waste Generated in Operations decreased by -33%, reflecting SES's ongoing waste management efforts.

| KPIs Scope 3 | | 2023 | 2024 | 2024 vs. 2023 |
|---|---|---|---|---|
| Cat.1 | Purchased goods and services | 52,415 | 45,738 | -12.7% |
| Cat.2 | Capital goods | 21,733 | 33,236 | +52.9% |
| Cat.3 | Fuel- and energy-related activities | 5,396 | 8,116 | +50.4% |
| Cat.4 | Upstream transportation and distribution | 505 | 454 | -10.2% |
| Cat.5 | Waste generated in operations | 68 | 46 | -32.9% |
| Cat.6 | Business travel | 5,684 | 4,506 | -20.7% |
| Cat.7 | Employee commuting | 2,232 | 1,917 | -14.1% |
| **Gross Scope 3 GHG emissions (tCO2eq)** | | **88,034** | **94,012** | **+6.8%** |

As part of its broader supplier engagement strategy, SES has launched an initiative to develop a Sustainability Supplier Scorecard to assess supplier sustainability performance. This initiative is part of an ongoing effort to gain better visibility into supply chain emissions, with further details to be presented in the next reporting cycle.

For the 2024 reporting cycle, SES has continued using a spend-based methodology for Scope 3 emissions, consistent with previous years. Until 2023, the cost of launchers and satellites was accounted for at the launch date, even though these costs were incurred over multiple years.

From 2024 onwards, SES has adopted a new approach based on contract milestone payments, which more accurately reflects actual cash flow and smooths yearly variations in emissions reporting. This updated methodology has been applied to both 2023 and 2024 emissions data for consistency. From 2025 onward, SES will fully integrate this approach into its reporting framework to enhance accuracy and comparability over time.

While SES achieved a notable reduction in Scope 1 emissions (-21.2%) reflecting ongoing efforts to optimise energy efficiency and transition to low-carbon alternatives, Scope 2 emissions increased by 3.9% in 2024.

## Performance and progress, Scope 1 + 2 GHG Emissions – Market Based

While SES achieved a notable reduction in Scope 1 emissions (-21.2%) reflecting ongoing efforts to optimise energy efficiency and transition to low-carbon alternatives, Scope 2 emissions increased by +3.9% in 2024. This rise underscores the impact of increase energy use. However, SES's renewable electricity procurement continues to mitigate emissions growth.
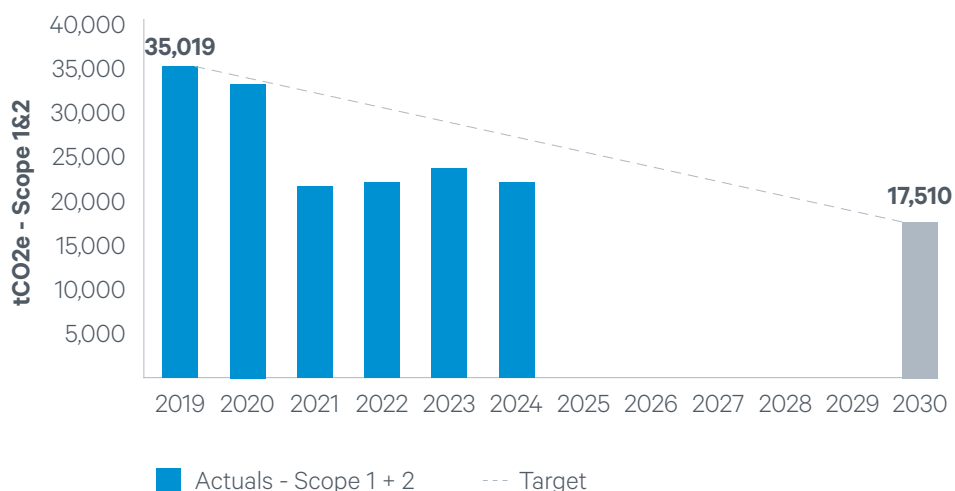


y-axis: tCO2e - Scope 1&2

35,019 (2019) ... 17,510 (2030)

Legend: ■ Actuals - Scope 1 + 2   --- Target

| KPIs Total Scope 1 + 2 | 2019 baseline | 2023 | 2024 | 2024 vs. 2023 | 2024 vs. baseline |
|---|---|---|---|---|---|
| Scope 1+2 GHG emissions (market-based) (tCO$_2$eq) | 35,019 | 23,504 | 22,065 | -6.1% | -37.0% |

## Performance and progress, Scope 1 + 2 GHG Emissions – Location Based

While SES achieved a notable reduction in Scope 1 emissions (-21.2%) reflecting ongoing efforts to optimise energy efficiency and transition to low-carbon alternatives, Scope 2 emissions increased by +10.8% in 2024. This increase is largely attributed to higher electricity consumption in specific locations where grid electricity has a higher carbon intensity.



y-axis: tCO2e - Scope 1&2

31,780 (2019) ... 15,890 (2030)

Legend: ■ Actuals - Scope 1 + 2   --- Target
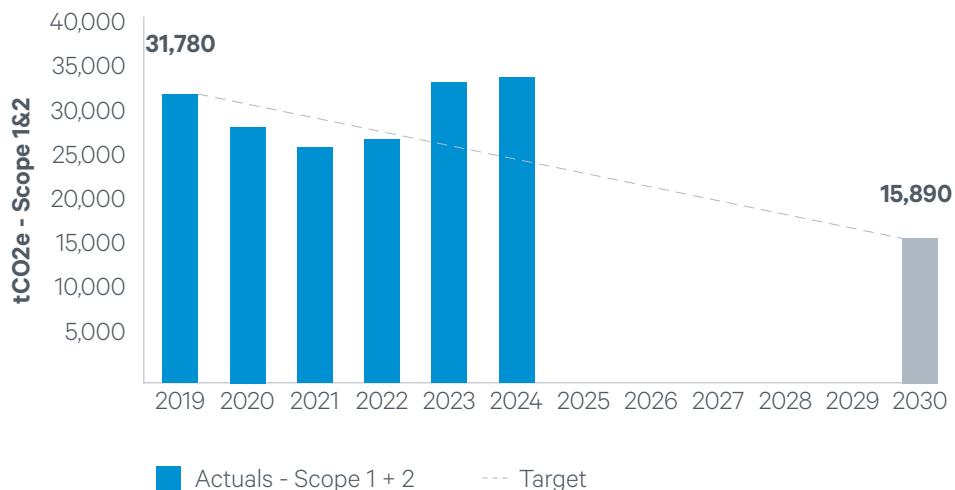
| KPIs Total Scope 1 + 2 | 2019 baseline | 2023 | 2024 | 2024 vs. 2023 | 2024 vs. baseline |
|---|---|---|---|---|---|
| Scope 1+2 GHG emissions (location-based) (tCO$_2$eq) | 31,780 | 33,221 | 33,678 | +1.4% | +6.0% |

## GHG removals and GHG mitigation projects financed through carbon credits ESRS E1-7

SES is currently undertaking a climate adaptation plan which will provide the foundation for a concrete and comprehensive transition plan. This plan will address non-avoidable emissions by evaluating potential GHG removals and mitigation strategies. As part of this process, SES will explore various mitigation projects, including those financed through carbon credits, to offset its emissions. The evaluation will include GHG removal technologies and nature-based solutions to further reduce its carbon footprint. A full action plan, encompassing these mitigation and removal strategies, will be defined and detailed in the next reporting cycle, ensuring that SES's climate strategy evolves in alignment with emerging best practices and regulatory frameworks.

## Internal carbon pricing ESRS E1-8

SES is currently undertaking a climate adaptation plan which will help define a concrete transition plan. As part of this process, SES is exploring the potential implementation of an internal carbon pricing mechanism to facilitate informed investment decisions. The business case for these decisions, incorporating carbon pricing versus business-as-usual scenarios, is expected to drive higher profitability and accelerate the implementation of sustainability-focused projects. This approach could also influence the company's sourcing strategy, guiding procurement decisions to better align with long-term climate goals. The final decision on internal carbon pricing will be assessed later as part of the broader adaptation strategy.

## Anticipated Financial Effects and Mitigation Actions ESRS E1-9

In alignment with SES's ongoing climate adaptation and transition plans, the anticipated financial effects of sustainability initiatives are expected to include both direct and indirect costs and savings over time. These will primarily result from the implementation of measures to reduce emissions, enhance energy efficiency, and transition to sustainable sourcing. However, as SES is still in the process of finalising its adaptation plan, all anticipated financial effects are conditional upon the final decisions and strategies outlined in the plan.

- **Capital Investments:** Initial investments may be required for upgrading infrastructure, technology, and processes to meet sustainability targets, such as transitioning to renewable energy sources and adopting energy-efficient systems. The specific investments will depend on the finalised adaptation plan.

SES is currently undertaking a climate adaptation plan in 2025, which will provide the foundation for a concrete and comprehensive transition plan.

*Over time, SES expects savings from reduced energy consumption. The extent of these savings will be contingent on the finalised plan's scope and timeline.*

- **Operational Costs:** There may be increases in short-term operational costs related to sustainability initiatives, including higher costs for sustainable materials, emissions tracking, and compliance with new regulatory requirements. These costs will be assessed and refined as the adaptation plan progresses.

- **Cost Savings:** Over time, SES expects savings from reduced energy consumption. The extent of these savings will be contingent on the finalised plan's scope and timeline.

- **Carbon Credit Investments:** Potential costs associated with purchasing carbon credits for offsetting non-avoidable emissions, depending on the availability and market price of credits. These investments will be evaluated in the context of the adaptation plan's final strategy.

**Mitigation Actions:**
To manage the anticipated financial impacts, SES will implement several mitigation actions, which remain subject to the outcomes of the ongoing adaptation plan:

- **Leveraging Internal Carbon Pricing:** This will help integrate the true environmental cost into investment decisions, ensuring that sustainability initiatives are financially competitive and align with the company's long-term financial objectives. The final approach to internal carbon pricing will be confirmed as part of the adaptation plan.

- **Cost Optimisation:** SES will focus on optimising operational costs through resource efficiency, energy savings, and waste reduction, reducing the financial burden of implementing sustainability initiatives. Specific actions will be clarified once the adaptation plan is complete.

- **Strategic Partnerships:** Collaborating with stakeholders, including suppliers, technology providers, and industry partners, to leverage external expertise, share costs, and maximise the impact of sustainability investments. These partnerships will be explored further as part of the transition strategy.

- **Phased Implementation:** Implementing sustainability initiatives in phases to manage cash flow and spread capital investment costs over time, ensuring the financial feasibility of the transition plan. The timeline and phases will depend on the final adaptation plan.

- **Government and Regulatory Incentives:** SES will actively pursue government incentives, tax breaks, and subsidies available for green initiatives to offset upfront costs. The availability of such incentives will be evaluated as part of the adaptation plan.

These measures will help SES navigate the financial challenges associated with its sustainability commitments while ensuring long-term value creation. However, the specific actions and financial impacts will be finalised once the adaptation plan is complete.

# RESOURCE USE AND CIRCULAR ECONOMY

The efficient use of resources and circularity have an essential role to play in driving more sustainable consumption and production across the lifecycle of our products. This section presents our approaches, the materiality of this topic, and the actions and opportunities around waste management within SES.

## IMPACTS, RISKS AND OPPORTUNITY MANAGEMENT ESRS 2 SBM-3

The key business units associated with resource use and circular economy material impacts, risks, and opportunities include facility management, health and safety, vendor management & procurement, risk and audit, business strategy, ESG, legal & compliance, and technology. SES also identified the disclosure of material impacts and risks of maintaining the status quo, caused by intensifying regulatory pressures, as the main risk if SES fails to take appropriate action. This could lead to potential fines.

As a leading space company, SES is committed to sustainable practices that minimise environmental impact and promote resource efficiency. This section outlines the material impact risks and opportunities associated with our waste management and circular economy initiatives

### Negative Impact: Waste Produced by Operations

SES generates waste from its operations, with limited visibility on how this waste is handled by its subcontractors. Improper disposal of this waste could lead to environmental pollution and health issues for surrounding communities. Additionally, the company could face operational and regulatory challenges.

### Lack of Effective Waste Management

If SES fails to manage waste effectively, this could result in environmental contamination, regulatory penalties reputational risks and potential fines.

### Opportunity: Resource Use and Circular Economy Programme

Implementing a circular economy programme to optimise resource use could result in reduced waste and operational costs for SES. The company would benefit from cost savings and improved sustainability, customer satisfaction and ensure compliance to resource efficiency standards.

## OUR APPROACH AND POLICIES E5-1

Historically, SES has followed guidelines set by the Ministry of Environment of Luxembourg to manage waste at the company headquarters. Alongside this mandatory exercise, our waste management practices are audited annually, and our Green Certificates from Luxembourg SuperDrecksKescht (SDK) ecolabel for 23 consecutive years, demonstrate that we have very good ecological and economical waste management systems in the headquarters. The Chief Technology Officer oversees the implementation of our waste management strategy, while Facility Management takes responsibility for waste disposal. Now that this topic has been identified as partially material for SES, all resource use and circular economy actions and objectives are far more important.

We recognise the need to develop internal environmental policies to guide our commitment to a circular model and ensure that every decision aligns with our environmental goals. As of now, there is a lack of a formal internal policy framework. The main reason has been a lack of resources and capabilities.

# ACTIONS AND RESOURCES [E5-2]

| List of Actions | Description |
|---|---|
| Partnership with Local NGOs | Collaborating with a recycling entity in Luxembourg to donate furniture in good condition to local NGOs and individuals in need |
| Supplier Agreements | Establishing a return programme with our main furniture supplier to refurbish and reuse old or broken office chairs |
| Sales of Unused Furniture | Selling unused furniture (desks, cupboards, and chairs) to a long-term cleaning supplier, freeing up warehouse space |
| Reusing Packaging Materials | Reusing cardboard, boxes, and Styrofoam from incoming packages for outbound shipping |
| IT Device Donation | Partnering with a Luxembourg-based association to collect and distribute old devices for educational purposes |
| Minimising Office Supplies | Reusing and redistributing existing office supplies recovered from projects, training sessions, or employees who leave |

Key actions taken to achieve resource use and circular economy related objectives and targets

Our waste management initiatives aim to significantly reduce the amount of waste sent for disposal, maximise reuse and recycling, and minimise the environmental impact of our waste.

**Key activities related to resources and waste management:**

The table on the left outlines the key actions taken to achieve resource use and circular economy, excluding the percentages of waste from operations that were recycled or not recycled.

Our Betzdorf site has seen a number of waste management and sustainability initiatives on top of these key actions. In addition to the solar panels mentioned in the climate action section, these include the upgrade of 61 recycling stations to improve waste management; a dedicated waste collection e-form; new processes for recycling batteries and cigarette filters; and celebrating World Environmental Day to promote resource efficiency and circular practices among employees. In our ongoing efforts to minimise plastic waste, we have implemented several key measures. The bins in our recycling stations are now emptied twice a week, compared to five times previously.

Additionally, all plastic bottles have been eliminated from the two canteens, and plastic cups have been removed from all coffee machines. Furthermore, in 2023, we launched a food waste reduction programme at our Betzdorf HQ, using excess canteen food to provide nutritious, vacuum-sealed meals for shift workers. No specific timeline has been defined for the global scope of SES, but increasing the resource flow and waste management strategy and framework for guiding and monitoring progress is part of this year's plan. All these actions and initiatives aim to:

Reduce the amount of waste generated in SES

- Improve the recycling efficiency of the waste generated, by diverting it from disposal
- Reduce the waste directed to disposal to the most possible extent

**Additional activities linked to the Life Cycle Assessment**

Resource inflows (the materials and resources entering a system) and outflows (the waste and emissions leaving it) are closely aligned with Life Cycle Assessment (LCA) principles to evaluate their environmental impact at every stage. This approach supports the circular economy by creating a clear baseline for waste management, enabling the identification of strategies to reduce waste and maximise resource efficiency.

In 2023, SES carried out the first industry-led LCA for the Astra 1P satellite in partnership with a major industry player. An LCA evaluates the environmental impact of a product throughout its life cycle, from raw material extraction to disposal or recycling. This methodology aligned with the International Organization for Standardization (ISO) guidelines (ISO 14040 & 14044). The Astra 1P satellite is a wide-beam satellite positioned at 19.2 degrees east. The assessment looked at elements such as ozone depletion, climate change, and resource use. This unique LCA is the first collaboration between two private companies on such a large scale and assessed all major phases of the satellite's lifecycle:

1. Satellite Procurement and Manufacturing
2. Launch
3. Ground Operations (including user terminals and gateways)
4. In-Orbit Operations

INPUTS
- Transportation
- Materials
- Energy
- Ancillary
- Processes

OUTPUTS
- Emissions
- Waste
- Mass left in space

● Ground & Procurement  ● Launch  ● In Orbit
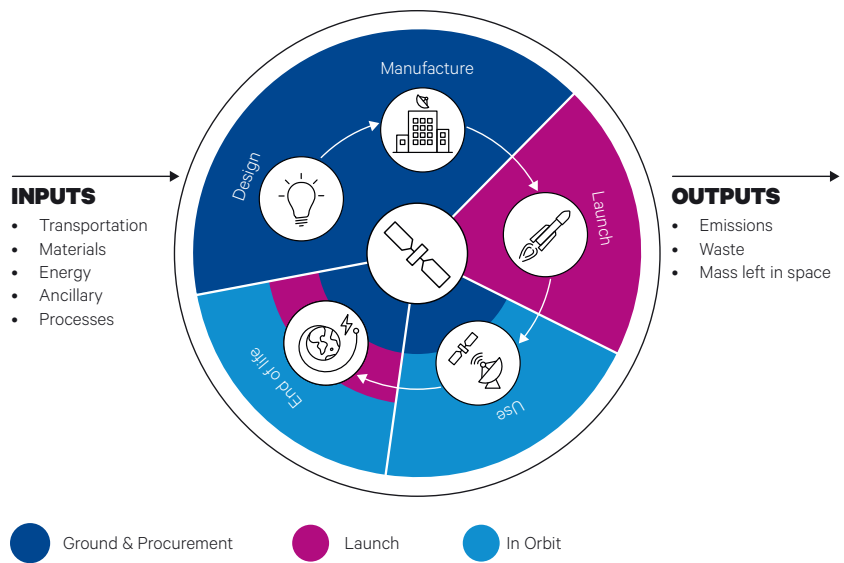
LCA inputs and outputs flow

Based on the findings, we plan to conduct further evaluations and implement measures that address these key environmental impacts.

# TARGETS AND METRICS E5-3

In addition to the SBTi targets directly related to GHG emissions, we are also developing quantifiable metrics and targets in the following areas:

### Striving for circularity

The DMA highlighted a need to deepen our focus on circularity and waste management. We are addressing this need by integrating eco-design and circularity principles into our products; developing quantifiable metrics and targets to drive constant improvement; and enhancing waste data collection.

As our data collection processes improve it will become clear where we have actionable levers available. At that time we aim to develop more robust and effective targets in the medium and long term.

### Resource Outflow and Waste data

We work with certified waste companies to handle disposal, who then provide certificates detailing the weight and destination of each waste type. This data is compiled, verified by auditors, and submitted annually to receive the Green Certificate. The collection table, along with invoices and certificates of destruction, is stored in an internal SharePoint database accessible to relevant departments, mainly ESG and FM. This methodology ensures that all disclosed data is reliable, certified, and controlled, providing a comprehensive overview of SES's waste management practices. The following table present the total amount of waste diverted from disposal and for which the recovery operations type is: preparation for reuse, recycling, and other operations.

Starting in March 2025, SES will partner with a single waste management company to handle all waste categories in Betzdorf. This decision aims to enhance the efficiency and traceability of our waste collection and disposal processes. By consolidating our waste management with one partner, we expect improvements in data collection, end-of-life waste traceability, and communication. Additionally, this change will streamline operations and reduce financial costs through operational synergies.

Finally, SES is currently developing an Environmental and Circularity Policy that should be in application from the first quarter of 2025, covering several aspects of waste from SES operations. This will be complemented at a later stage with a stronger waste management strategy.

# RESOURCE OUTFLOWS E5-5

The 2024 DMA identified waste management as a priority impact, highlighting the need to enhance existing waste disposal and recycling methods. In some cases, SES relies on traditional disposal systems, which results in a significant among of waste being directed to landfill. The lack of recyclable materials in manufacturing processes and operational practices further hinders circularity efforts.

SES classifies waste into three main categories:
- General waste: plastics, wood, paper, cardboard, iron, glass.
- E-waste: electrical and electronic equipment
- Organic waste: food, oils, and garden waste.

However, the only waste streams relevant to our sector is E-waste that can be categorised into electrical and electronic equipment excluding IT standard material and E-waste containing Hazardous components.

In terms of methodologies, SES's facility management team compiles data on waste management from four waste companies (three in Luxembourg, one in Germany) that handle all waste categories generated by SES. Waste collection occurs weekly, bi-weekly, or upon request, depending on the type. The Facility Operations Coordinator manually records the weight and price of waste collected and treated monthly, based on invoices and certificates of destruction from the waste partners, which are certified and controlled by the SDK. This data is entered into a collection table designed with the SDK and used for yearly audits.

We are now aiming to improve waste tracking by potentially consolidating all waste management with a single partner. This would allow us to monitor more closely the ways in which our waste is recycled, including the percentage that is incinerated or sent to landfill.

| CED Code | Waste Category | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | Units |
|---|---|---|---|---|---|---|---|---|
| 200135* | Electrical devices | 7603 | 12346 | 6622 | 5380 | 3613 | 25531 | Kg |
| 200138 | Treated wood | 6400 | 19330 | 9440 | 2440 | 19800 | 19540 | Kg |
| 170411 | Cables | 191 | 403 | 168 | 2129 | 4410 | 176 | Kg |
| 150101 | Cardboard, paper | 19660 | 17180 | 12340 | 11750 | 10980 | 18250 | Kg |
| 160215* | Ink and toner cartridges | | 156 | | | 28 | 52.03 | Kg |
| 200108 | Kitchen and canteen waste | 30469 | 12406 | 9077 | 12642 | 14905 | 15504 | Kg |
| 170107 | Demolition waste, uncontaminated | 6810 | 2620 | 1980 | 2750 | 3750 | 5830 | Kg |
| 200201 | Garden and park waste | 5790 | 6090 | 3860 | 3390 | 3730 | 6470 | Kg |
| 200139 | Plastic waste | 2140 | 1520 | 1540 | 1380 | 3010 | 4176 | Kg |
| 200301 | Mixed municipal waste (residual) | 52780 | 73250 | 32500 | 26880 | 30340 | 58520 | Kg |
| 150110* | Harmful product packaging/ aerosol bombs | 215 | 43 | 91 | 2 | 72 | 119 | Kg |
| 150106 | PMC packaging (Valorlux collection) | 1828 | 821 | 505 | 489 | 657 | 1494 | Kg |
| 200140 | Scrap, metal waste | 4480 | 11400 | 3670 | 1140 | 8700 | 22584 | Kg |
| 190809 | Separator Fats and Oils (Liter) | 7000 | | 778 | | 10500 | 14000 | L |
| 200125 | Edible oils and fats | 598 | | | | 379 | 650 | Kg |
| 200121* | Lamps containing mercury | 364 | | 200 | | 180 | 185 | Kg |
| 200101 | Confidential documents | 7153 | 1892 | 3190 | 5964 | 2210 | 3395 | Kg |
| 200139 | Data support | | 220 | 610 | 340 | 80 | 1 | Kg |
| 150107 | Hollow glass | 370 | | 577 | | 500 | 611 | Kg |
| 200303 | Street cleaning waste | 41360 | | | | | | Kg |
| 200133* | Batteries, dry cells | 174 | 160 | 188 | | | 185 | Kg |
| 200123* | Fridges (chlorofluorocarbons) | 3135 | 256 | | | | | Kg |
| 180103* | Infectious hospital waste | 5 | | 1 | | | | Kg |
| 160114* | Coolant | 750 | | | | | | Kg |
| 170604 | Worm wool and rock wool | | 119000 | | | | | Kg |
| 170802 | Placoplatre | | 4300 | 2360 | | | | Kg |
| 150102 | Mixed plastic containers | | 520 | | | | | Kg |
| 200115* | Basic bases and detergents | | | | 40 | | | Kg |
| 150102 | Polystirene | | | | 3000 | | | Kg |
| 150202* | Oily products | | | | 279 | | | Kg |
| 160602* | Ni-Cd batteries | | | | | | 112 | Kg |
| 160601* | Lead batteries | | | | | | 51 | Kg |
| 160504* | Aerosol bombs | | | | | | 14 | Kg |
| 130802* | Light emulsions | | | | | | 244 | Kg |
| 200199 | Cigarette buts | | | | | | 39.81 | Kg |
| 160506* | Liquid organic chemical waste | | | | | | 520 | Kg |
| **Total Amount of waste directed to disposal by waste treatment by hazardous waste** | | **12246** | **12705** | **7358** | **5701** | **3893** | **27,198.03** | **Kg** |
| **Total Amount of waste directed to disposal by waste treatment by non-hazardous waste** | | **180029** | **270952** | **81817** | **74294** | **103451** | **157240.81** | **Kg** |
| | | **7000** | | **778** | | **10500** | **14000** | **L** |

Total amount of waste diverted from disposal

# EU TAXONOMY

## General considerations

SES has continued its evaluation of its associated economic activities by screening the economic activities in the Climate Delegated Act (Commission Delegated Regulation (EU) 2021/2139), the Complementary Climate Delegated Act (Commission Delegated Regulation (EU) 2022/1214), the Environmental Delegated Act (Commission Delegated Regulation (EU) 2023/2486), and the amendments to the Climate Delegated Act (Commission Delegated Regulation (EU) 2023/2485). The accounting information represents the consolidated financial statements.

## Methodology

As sets out in the regulation, an economic activity must meet the following criteria in order to qualify as environmentally sustainable (taxonomy-aligned):

- Substantially contribute to one or more of the six environmental objectives
- Do no significant harm (DNSH) to the other five objectives.
- Comply with minimum safeguards covering social and governance standards.
- Comply with the technical screening criteria (TSC) for the environmental objectives

To calculate the Turnover, CapEx, and OpEx indicators, SES utilizes data from our global databases. Due care was taken to avoid double counting through the following measures:

- Reconciliation with accounting information, which ensures appropriate consideration of eliminations and adjustments on consolidation.
- Verification of the completeness and accuracy of the data.

## Alignment Assessment

Due to a lack of data, we were not currently able to fully assess if we are meeting the substantial contribution criteria, the DNSH and the minimum safeguards as well as ensure compliance with the technical screening criteria. Therefore, we have to consider these activities as not aligned with the EU taxonomy.

## Eligible activities identified

| Economic Activities | Turnover CapEX/OpEX | Description | NACE Code | Environmental Objective |
|---|---|---|---|---|
| Transport by motorbikes, passenger cars and light commercial vehicles. | OpEX | Activities mainly related to vehicle leasing and rental. | N77.11 | Climate Mitigation |
| Installation, maintenance and repair of energy efficiency equipment. | CapEX | Initiatives mainly related to the modernisation of air conditioning and free-cooling systems in buildings. | F43.2, F43.3 | Climate Mitigation |
| Installation, maintenance and repair of charging stations for electric vehicles in buildings. | CapEX | Activities related to the Installation and maintenance of charging stations for electric vehicles on sites. | F43.3 | Climate Mitigation |
| Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings. | CapEX | Initiatives related to the installations of electronic devices to improve the energy management of buildings such as smart meters. | F43.2 | Climate Mitigation |
| Installation, maintenance and repair of renewable energy technologies. | CapEX | Initiatives related to the implementation of several Solar PV projects. | F43.21 | Climate Mitigation |
| Acquisition and ownership of buildings. | CapEX | Lease of Buildings. | L68.20 | Climate Mitigation |

**Proportion of turnover derived from products or services associated with Taxonomy-aligned economic activities – disclosure covering financial year 2024**

| Economic Activities (1) | Code (2) | Absolute turnover (3) | Proportion of Turnover (4) | Substantial Contribution Criteria | | | | | | | DNSH criteria ('Does Not Significantly Harm') | | | | | | | Minimum Safeguards (17) | Taxonomy aligned proportion of total turnover, year N (18)** | Category (enabling activity) (20) | Category (transitional activity) (21) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Climate Change Mitigation (5)* | Climate Change Adaptation (6) | Water (7) | Pollution (8) | Circular Economy (9) | Biodiversity and ecosystems (10) | | Climate Change Mitigation (11) | Climate Change Adaptation (12) | Water (13) | Pollution (14) | Circular Economy (15) | Biodiversity (16) | | | | |
| Text | | Millions, EUROS | % | % | % | % | % | % | % | | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| **A. TAXONOMY-ELIGIBLE ACTIVITIES** | | | 0% | | | | | | | | | | | | | | | | | |
| **A.1. Environmentally sustainable activities (Taxonomy-aligned)** | | | | | | | | | | | | | | | | | | | | |
| | | | 0% | 0% | 0% | 0% | 0% | 0% | 0% | | | | | | | | | 0% | | |
| **Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)** | | **0.00** | **0%** | **0%** | **0%** | **0%** | **0%** | **0%** | **0%** | | **N** | **N** | **N** | **N** | **N** | **N** | **N** | **0%** | **0%** | **0%** |
| **A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)** | | | | | | | | | | | | | | | | | | | | |
| | | | 0% | | | | | | | | | | | | | | | | | |
| **Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)** | | **0.00** | **0%** | | | | | | | | | | | | | | | | | |
| **Total (A.1+A.2)** | | **0.00** | **0%** | | | | | | | | | | | | | | | | | |
| **B. TAXONOMY-NON-ELIGIBLE ACTIVITIES** | | | | | | | | | | | | | | | | | | | | |
| **Turnover of Taxonomy-non-eligible activities** | | **2,001.07** | **100%** | | | | | | | | | | | | | | | | | |
| **Total (A+B)** | | **2,001.07** | **100%** | | | | | | | | | | | | | | | | | |

## Proportion of CapEX derived from products or services associated with Taxonomy-aligned economic activities – disclosure covering financial year 2024

| Economic Activities (1) | Code (2) | Absolute CapEx (3) | Proportion of CapEx (4) | Climate Change Mitigation (5)* | Climate Change Adaptation (6) | Water (7) | Pollution (8) | Circular Economy (9) | Biodiversity and ecosystems (10) | Climate Change Mitigation (11) | Climate Change Adaptation (12) | Water (13) | Pollution (14) | Circular Economy (15) | Biodiversity (16) | Minimum Safeguards (17) | Taxonomy aligned proportion of total CapEx, year N (18)** | Category (enabling activity) (20) | Category (transitional activity) (21) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Text | | Millions, EUROS | % | % | % | % | % | % | % | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| **A. TAXONOMY-ELIGIBLE ACTIVITIES** | | | 1% | | | | | | | | | | | | | | | | |
| **A.1. CapEx of environmentally sustainable activities (Taxonomy-aligned)** | | | | | | | | | | | | | | | | | | | |
| CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1) | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | N | N | N | N | N | N | N | 0.00 | 0.00 | 0.00 |
| **A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned)** | | | | | | | | | | | | | | | | | | | |
| Acquisition and ownership of buildings (CapEx C) | | 0.71 | 0% | | | | | | | | | | | | | | | | |
| Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings) (CapEx C) | | 0.08 | 0% | | | | | | | | | | | | | | | | |
| Installation, maintenance and repair of energy efficiency equipment (CapEx C) | | 0.11 | 0% | | | | | | | | | | | | | | | | |
| Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings (CapEx C) | | 0.09 | 0% | | | | | | | | | | | | | | | | |
| Installation, maintenance and repair of renewable energy technologies (CapEx C) | | 1.70 | 1% | | | | | | | | | | | | | | | | |
| **CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)** | | 2.68 | 1% | | | | | | | | | | | | | | | | |
| **Total (A.1+A.2)** | | 2.68 | 1% | | | | | | | | | | | | | | | | |
| **B. TAXONOMY-NON-ELIGIBLE ACTIVITIES** | | | | | | | | | | | | | | | | | | | |
| **Capex of Taxonomy-non-eligible activities** | | 300.52 | 99% | | | | | | | | | | | | | | | | |
| **Total (A+B)** | | 303.20 | 100% | | | | | | | | | | | | | | | | |

**Proportion of OpEX derived from products or services associated with Taxonomy-aligned economic activities – disclosure covering financial year 2024**

| Economic Activities (1) | Code (2) | Absolute OpEx (3) | Proportion of OpEx (4) | Substantial Contribution Criteria | | | | | | DNSH criteria ('Does Not Significantly Harm') | | | | | | Minimum Safeguards (17) | Taxonomy aligned proportion of total OpEx, year N (18)** | Category (enabling activity) (20) | Category (transitional activity) (21) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Climate Change Mitigation (5)* | Climate Change Adaptation (6) | Water (7) | Pollution (8) | Circular Economy (9) | Biodiversity and ecosystems (10) | Climate Change Mitigation (11) | Climate Change Adaptation (12) | Water (13) | Pollution (14) | Circular Economy (15) | Biodiversity (16) | | | | |
| Text | | Millions, EUROS | % | % | % | % | % | % | % | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| **A. TAXONOMY-ELIGIBLE ACTIVITIES** | | | 0% | | | | | | | | | | | | | | | | |
| **A.1. Environmentally sustainable activities (Taxonomy-aligned)** | | | | | | | | | | | | | | | | | | | |
| **OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)** | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | N | N | N | N | N | N | N | 0.00 | 0.00 | 0.00 |
| **A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)** | | | | | | | | | | | | | | | | | | | |
| Transport by motorbikes, passenger cars and light commercial vehicles (OpEx C) | | 0.87 | 0% | | | | | | | | | | | | | | | | |
| | | | 0% | | | | | | | | | | | | | | | | |
| **OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)** | | 0.87 | 0% | | | | | | | | | | | | | | | | |
| **Total (A.1+A.2)** | | 0.87 | 0% | | | | | | | | | | | | | | | | |
| **B. TAXONOMY-NON-ELIGIBLE ACTIVITIES** | | | | | | | | | | | | | | | | | | | |
| **OpEx of Taxonomy-non-eligible activities** | | 1,907.80 | 100% | | | | | | | | | | | | | | | | |
| **Total (A+B)** | | 1,908.68 | 100% | | | | | | | | | | | | | | | | |

# SOCIAL

## OWN WORKFORCE ESRS S1

As an international company employing more than 2000 people worldwide, we strongly believe in the importance of a diverse and inclusive environment. We nurture a safe and healthy workplace, supporting the goals of our employees, understanding their work cultures, and implementing excellent people and culture practices.

## OUR MATERIAL IMPACTS AND RISKS ESRS 2 SBM-3

As a leading space company, SES is dedicated to fostering a supportive and inclusive work environment.

In terms of workforce conditions and training, the space industry faces a unique set of challenges due to its highly skilled nature and significant safety risks. As a leading space company, SES is dedicated to fostering a supportive and inclusive work environment. This section outlines the material impact risks and opportunities associated with our workforce. By addressing these areas, SES aims to enhance employee satisfaction, comply with regulatory standards, and maintain a motivated and skilled workforce.

The DMA showed that our main stakeholders identified both working conditions and equal treatment and opportunities as priority topics.

**Working Conditions**
**Risk: Failure to respect labour regulations**
If SES fails to respect labour regulations and international standards, this could result in legal penalties, fines and reputational damage. Maintaining SES' diligence regarding applicable laws and ensuring policies and procedures are regularly updated is critical to ensure compliance.

**Positive Impact: Benefits and Well-being Programme**
Implementing a benefits and well-being programme for employees could result in improved employee satisfaction and retention. SES would benefit from

Our company employs a comprehensive process to identify and assess actual and potential impacts on our workforce, primarily through internal stakeholder engagement and surveys. Our focus on digital transformation is the main aspect linked to these identified impacts, necessitating reskilling and upskilling initiatives. Additionally, we emphasise diversity and inclusion (d&i) and equal opportunities and treatment as another key focus area. The insights gained from assessing workforce impacts inform our strategic decisions, leading us to invest in training programmes to align workforce capabilities with strategic goals and promote d&i initiatives to improve employee satisfaction and reduce operational risks, ensuring our strategy remains resilient and responsive to workforce needs.

a motivated workforce, employees would experience better well-being, and the company would see enhanced productivity.

### Risk: Health and Safety Incidents

Health and safety incidents related to the installation, maintenance, and operation of critical infrastructures, including potential exposure to electromagnetic waves, may occur in SES operations. This could result in health risks for employees and potential regulatory penalties if regulations are not adhered to. Continued training and monitoring of health and safety incidents lessens this risk.

### Equal treatment and Opportunities
### Risk: Weak Learning and Development (L&D) Programme

If SES's learning and development programme is weak, this could result in inadequate skill development and reduced employee engagement. SES would face challenges in maintaining a skilled workforce and potential productivity

losses, while employees may experience limited career growth, potentially leading to higher attrition rates.

### Positive Impact: Strong Social Programmes

Implementing strong social programmes could result in a more inclusive and innovative work environment. SES would benefit from a variety of perspectives, employees would enjoy a better work experience, and the company would see enhanced creativity and performance.

### Risk: Lack of Broad Representation

The underrepresentation of women in the Science, Technology, Engineering, and Mathematics (STEM) fields continues to persist. SES could face reputational risks and potential challenges in attracting top talent due to a less inclusive culture.

During our assessment, other work-related rights, including child labour, forced labour, adequate housing, and privacy, were not identified as material.

## OUR APPROACH AND POLICIES ESRS S1-1

### Our code of conduct
The Code of Conduct represents our main internal policy The Code discusses a range of issues including bribery and facilitation; political activities; sanctions; export controls; competition/antitrust; anti-money laundering; intellectual privacy; antiboycott; insider trading; conflicts of interest; fair employment; harassment; contractors and agents; data protection; fundamental rights; the environment; health and safety; and the use of social media. Many of these topics are also addressed in separate detailed policies. Moreover, it also explicitly address trafficking in human being, forced labour or compulsory labour and child labour.

For more information on our Code of Conduct, you can refer to the Business conduct policies and corporate culture section.

Our internal policies and regulations are all developed in line with an array of recognised international standards including the principles of the UNGC; the Universal Declaration of Human Rights; and the principles laid down in the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. All our policies apply to all employees, contractors, and subcontractors.

*Making a positive impact in the world starts with ensuring the welfare of our employees. Delivering on our goals cannot be achieved without motivated employees who enjoy working with us and feel protected.*

We also worked regularly with social partners and unions to define these policies as required by local legislation. A mandatory compliance training programme ensures the entire workforce adheres to the expected standards.

### Policy against harassment

Making a positive impact in the world starts with ensuring the welfare of our employees. Delivering on our goals cannot be achieved without motivated employees who enjoy working with us and feel protected. As detailed in our Anti-Harassment Policy, we maintain a strict zero-tolerance policy towards any form of harassment or inappropriate behaviour – including but not limited to those based on gender, race, colour, age, religion, national origin, marital status, sexual orientation, disability, health status, veteran status, or any other legally protected characteristic.

Individuals who believe they have been impacted by harassment can request assistance to support them through the reporting procedure. This is in recognition that raising an issue of harassment in the workplace can be difficult for many people. We have also in the spirit of transparency committed to providing updates on the process and outcome of any claim to the individuals concerned. We believe that education is a powerful tool in preventing harassment, and all SESers are required to undergo anti-harassment training. This training is designed to increase awareness, provide tools for intervention, and foster a workplace culture that rejects discrimination and harassment in all forms.

SES does not have a specific policy commitment related to inclusion or positive action for people from groups at particular risk of vulnerability.

### Environmental, Health and Safety Charter

At SES, we are committed to protecting the environment and ensuring the health and safety of our employees, customers, and partners. That is why we have created the Environmental, Health and Safety Charter, which outlines our policies and expectations for environmental protection across our value chain. The Environmental, Health and Safety Charter is a policy statement from SES that describes a systematic approach to identifying, evaluating, and managing environmental, health, and safety risks through teamwork and leadership commitment. It outlines SES's commitment to continuous improvement, communication, education, and training in the areas of environmental protection, health, and safety measures and serves as a guide for the organisation to achieve its goals in these areas.

# ENGAGING WITH OUR OWN WORKFORCE S1-2

We are committed to maintaining a safe, ethical, and supportive work environment. We have established comprehensive processes to address and remediate any negative impacts on our workforce, as well as multiple channels for employees to voice their concerns.

At SES, we recognise the importance of engaging with our workforce to understand and address both actual and potential impacts on our employees. Our approach to workforce engagement includes a variety of formal and informal channels to ensure open communication and collaboration.

- **All Hands Meetings (AHM):** We hold regular global AHMs where senior management discusses company performance, upcoming projects, and potential workforce impacts. These sessions encourage open dialogue and employee engagement.
- **Team-Level Sessions:** Each business unit conducts regular team-level sessions to discuss performance, projects, challenges, and opportunities.
- **Management and Employee Meetings:** In Luxembourg, The Netherlands, Germany, and Israel, management and employee representatives meet regularly to address workplace safety, diversity, inclusion, and business updates.
- **Business Talks:** Regular Business Talks are held to address specific topics, update employees, and collect input.
- **Policy Development and Organisational Changes:** Workforce engagement is integral during policy development, organisational changes, and practice evaluations.
- **Employee Surveys:** Annual employee engagement surveys cover workplace conditions, management practices, and job satisfaction. Feedback is analysed and shared with all staff, leading to action plans addressing any identified issues.
- **Social Updates:** We regularly share and review social updates with Employee Representatives and Equal Opportunity Officers to gather feedback and improve our initiatives.

- **Social Partner Engagement:** We engage social partners in dedicated sessions for updates and feedback, ensuring ongoing communication and prompt issue resolution.

The Chief People Officer (CPO) is accountable for ensuring all engagement activities are conducted regularly and effectively. The CPO also ensures that the insights gained are communicated to the executive leadership team and integrated into the company's strategic planning and decision-making processes.

The effectiveness of this engagement is regularly assessed through surveys, feedback and measuring participation rates in engagement activities.

For more information, please refer to section Interests and views of stakeholders.

### Remediation channels for own workforce S1-3

We are committed to maintaining a safe, ethical, and supportive work environment. We have established comprehensive processes to address and remediate any negative impacts on our workforce, as well as multiple channels for employees to voice their concerns. Employees can raise a concern directly with their line manager. However, if the matter is more serious or the employee prefers not to approach their line manager for any reason, they have several alternative options. They can raise a concern with their local Compliance Officer, SES's Internal Audit team, SES's Global Compliance Hotline, the SES Ombudsperson, or, in exceptional circumstances (such as significant financial impact, involvement of senior personnel, or major implications for SES's business or reputation), the Chairperson of the Audit and Risk Committee.

Employees also have an assigned People (Human Resources) Partner who acts as their personal representative. In Luxembourg, a Personnel Delegation is elected by employees for a five-year term, allowing them to submit complaints directly to these representatives, either in person or anonymously.

We foster a culture that views raising concerns as a positive and constructive action. In our compliance training sessions, we educate employees on the importance of speaking up and inform them about the various channels available for raising concerns.

For more information on our general remediation process and or non-retaliation policy, you can refer to the Business conduct policies and corporate culture and remediation and raising concerns sections.

# ACTIONS S1-4

## Equal Treatment and Opportunities

**Diverse Workforce**
A diverse workforce and an inclusive environment are integral to our success. They bring the variety of perspectives, experiences, and skills that improve problem-solving, creativity, innovation, and customer understanding. We therefore strive to ensure our people feel valued, respected, and empowered to thrive as individuals. Beyond the numbers, we help to nurture leaders who are inclusive, create safe spaces, and inspire others.

**Addressing Material Negative Impacts and Managing Risks**
**Risk of Lacking Diversity in Workforce:**
We acknowledge the risk associated with a lack of diversity in our workforce, which can hinder innovation and limit perspectives. To mitigate this risk, we have implemented comprehensive strategies to nurture our leaders and enhance opportunities at all levels of our organisation.

**Commitment to Gender Diversity:**
Our key actions include:
• Mentoring programmes to provide guidance and support.
• Coaching: Offering coaching sessions in 2023 and 2024 to support career development.
• Tracking Resignation Drivers: Monitoring and addressing factors contributing to employee resignations.
• Promotion Cycles: Ensuring all viable candidates in promotion considerations.

**Pursuing Material Opportunities and Positive Impacts**
**Developing and Fostering a Strong Social Programme:**
Our social programmes are designed to create a workplace that values every hue, background, and perspective. We are committed to hiring inspiring individuals from all backgrounds and ensuring safe and inclusive processes for recruitment, retention, and evolution of all employees, regardless of gender, race, ethnicity, religion, sexual orientation, disability, veteran or marital status, or background. Our diversity actions are implemented at a global level, ensuring consistency and inclusivity across all our operations. We also meet at least twice per year with our Equal Opportunities officers and personal delegations to discuss progress and performance.

## Training and Skills [S1-4]

We understand that access to cutting-edge training, educational content, and delivery platforms helps to make SES an attractive workplace. It also plays a significant part in retaining key skills in a competitive and complex market. And so we aim to provide a comprehensive range of opportunities for learning and development to empower our employees with knowledge and continuous learning tailored to individual roles and skills. In addition to our internal compliance trainings, we offer external learning opportunities, certifications, accredited degree programmes, executive education programmes, language courses, and professional coaching.

At SES, we are embracing a modern approach to workplace learning, focused on providing accessible, flexible, and impactful learning experiences. We recognise that in today's fast-paced environment, employees need training that adapts to their needs, offering shorter, more focused microlearning opportunities alongside traditional courses. This shift in how we deliver content ensures that employees can easily integrate learning into their daily workflows, empowering them with the skills and knowledge needed to thrive in their roles.

In addition to our internal compliance training, we offer a wide range of external learning resources, including certifications, accredited degree programmes, executive education, language courses, and professional coaching. We are proud of our 5 Key Skilling Initiative – focusing on Project Management, Customer Centricity, Operations, Generative AI, and Data Literacy – which align with our commitment to fostering a culture of continuous learning.

To further recognise achievements, we have partnered with GVF to offer the first digital badging initiative for satcom education, providing employees with a tangible way to showcase newly acquired skills and competencies in the industry. These initiatives and offerings ensure that SES remains a forward-thinking workplace, focused on empowering our employees to succeed and grow in a competitive market.

## Working Conditions [S-4]

At SES, we recognise the critical importance of working conditions in today's demanding work environment, including work-life balance and health and safety. These factors significantly impact employee well-being, productivity, and job satisfaction. Ensuring a healthy work-life balance helps our employees manage professional and personal responsibilities while robust health and safety measures protect our employees from workplace hazards, fostering a safe and supportive working environment.

**Social Protection** [S1-11]
We place great importance on providing optimal working conditions for our employees, especially in terms of workplaces, environments, employee empowerment, and progressive management. Modern life necessitates flexible schedules to meet individual needs. We support employees in balancing work and personal life through flexible working conditions.

Most of our employees are covered by public social protection programmes. However, there are a few exceptions. For example, in Ghana, the Labour Act does not clearly specify provisions for paid sick leave or its duration, and the government does not provide unemployment benefits to job seekers.

At SES, we recognise the critical importance of working conditions in today's demanding work environment, including work-life balance and health and safety.

Employee well-being is a top priority for the company, as it not only fosters a safe and supportive working environment but also enhances overall productivity and job satisfaction. Numerous initiatives have been implemented both globally and locally to address this matter.

In Singapore, unemployment benefits are not available to non-Singaporeans or non-permanent residents. Similarly, in Ethiopia, under the 2003 Labour Proclamation, employers are required to provide severance pay, but the state does not offer unemployment benefits.

However, even in countries where public social protection is lacking, all SES employees are safeguarded against loss of income due to employment injury, acquired disability, parental leave, and retirement through their contractual agreements. Our benefits ensures that employees have a safety net, providing financial stability and peace of mind, regardless of local legal provisions. Coverage for loss of income due to sickness or unemployment varies by country. Additionally,a new set of SES Leave Guidelines ensures that all SESers across all locations enjoy a minimum amount of leave when welcoming a child into their lives.

### Health and safety [S1-4]

SES maintained an ongoing commitment to safe and healthy work environments for employees, partners and customers. Our sites worldwide all comply with and often exceed local and international health and safety regulations. We continued to conduct risk assessments across all business activities, while adopting a proactive approach to mitigating health and safety risks. We also adhere to ISO45001 'Occupational health and safety management systems', which provides a framework for managing risks and opportunities. In addition, we strengthened our Global Environmental, Health and Safety framework to further embed safety as a core value.

2024 saw a particular focus on health and safety training and awareness.

Our onboarding training programme encompasses risk identification and mitigation, while also promoting a culture of safety awareness. We offer regular two-day first aid courses conducted by CGDIS: by 2024, 18% of the workforce at our Betzdorf Headquarters were certified. We also aim to certify shift workers who may be more vulnerable to risk, organising sessions that fit their availability, or offering additional vacation days to encourage attendance.

We are proud to report that we recorded zero major work-related injuries or ill-health incidents in 2024. Even so, we remain dedicated to evolving practices that protect our teams and sustain our global operations.

### Employee Well-being

Employee well-being is a top priority for the company, as it not only fosters a safe and supportive working environment but also enhances overall productivity and job satisfaction. Numerous initiatives have been implemented both globally and locally to address this matter. Throughout the year, informative sessions with experts in the field have been organised to assist employees in preventing work-related stress and navigating change. Additionally, certain locations offer supplementary services, including access to health insurance and sports classes both on and off campus. [ESRS S1 S1-4] Additionally, in 2024 SES has launched an Employee Assistance programme. Offered independently, the Employee Assistance Programme is freely available to SES employees and their immediate family members working in Belgium, France, Germany, Greece, Italy, Luxembourg, Romania, Spain, Sweden, The Netherlands, UK, and Ukraine. The EAP provides access to a wide range of independent and confidential advisory and support services. Other but similar programmes are offered to employees based in the US and Brazil.

**Training and skills development metrics** [S-13]

| Average training hours offered to employees | |
| --- | --- |
| Male employees | 6.5 |
| Female employees | 6 |
| **Percentage of employees that participated in regular performance and career conversations** | |
| Male employees | 74 |
| Female employees | 26 |

**Employee Workforce** [S1-6, S1-7]

SES counted with a headcount population of 2134 employees by the end of the year 2024, an average number of employees throughout the year of 2188 presenting a turnover rate of 17.1%. The workforce is distributed among 32 locations and is mostly concentrated in Luxembourg, the United States, Germany, The Netherlands, Israel, and Romania.

SES's external workforce at the end of the year 2024 consists of 581

resources, including Temporary Resources, Contractors and Service Providers. To define, recruit and contract these resources SES has defined an External Workforce process. The incorporation of these resources is tied to business requirements to be fulfilled. While temporary resources are typically employed to support SES employees for limited periods of time, Contractors and Service Providers are hired to bring in expertise on specific projects.

While we have no European Works Council in place, we have now initiated the process to set one up.

**Collective bargaining coverage and social dialogue** [S1-8]

| Location | % of population covered by Collective Bargaining Agreements (CBA) | % of population covered by Worker's Representatives |
| --- | --- | --- |
| Belgium | 100 | 100 |
| Luxembourg | 0 | 100 |
| Germany | 0 | 66 |
| Netherland | 0 | 100 |
| Romania | 0 | 0 |
| North America | 6 | 0 |
| Middle East | 90 | 0 |
| Latin America | 70 | 0 |
| India | 0 | 0 |
| APAC | 0 | 0 |
| Africa | 0 | 0 |

CBA and Worker's Representation

**Diversity metrics** [S1-9]

| | |
|---|---|
| Female employees | 546 |
| Female FTE permanent | 525 |
| Female employees at top management level | 17 |
| Employees under 30 years of age in non-executive positions | 231 |
| Employees under 30 years in executive positions | 0 |
| Employees between 30 and 50 years of age in non-executive positions | 1269 |
| Employees between 30 and 50 years of age in executive positions | 75 |
| Employees over 50 years of age in non-executive positions | 457 |
| Employees over 50 years of age in executive positions | 102 |

Employee Diversity

**Adequate wages** [S1-10 & S1-16]

SES ensures wage adequacy by annually purchasing, analysing, and monitoring external benchmark data for all roles and job grades in each country where it operates. This process guarantees that employees' compensation aligns with market standards and exceeds established adequacy thresholds. SES adopts a compensation strategy aimed at paying above the country average, specifically targeting the 75th percentile (P75) for each role. Regular monitoring and benchmarking enable SES to maintain compliance with its pay philosophy and address any discrepancies proactively, ensuring all employees receive competitive and adequate wages.

**Gender pay gap**

| Country | Female vs Male comparison |
|---|---|
| Luxembourg | -1.1% |
| The Netherlands | -1.8% |
| Germany | -0.8% |
| US | +0.9% |
| Israel | +4.3% |

Gender Pay Gap

SES assesses gender pay equity by comparing employee pay by country, role, job grade, and gender to identify any pay level differences between men and women in comparable roles. This analysis is conducted for the five major countries where SES operates, as these countries have sufficient employee representation across comparable roles and job grades to ensure meaningful data. In the rest of the countries where SES operates, however, most roles are unique or associated with unique job grades, making it impractical to calculate a gender pay gap. As a result, SES focuses its gender pay assessment on countries where the data provides reliable and actionable insights.

**Persons with disabilities** [S1-12]

Currently, SES does not collect data on the percentage of employees with disabilities. We acknowledge the importance of understanding the inclusion of persons with disabilities within our workforce, as outlined in ESRS S1-12.

We are exploring ways to responsibly collect and manage this information while ensuring compliance with applicable legal restrictions on data collection. As part of this effort, we are assessing methodologies for data gathering, including voluntary self-identification mechanisms, and we will engage with relevant stakeholders to ensure an ethical and transparent process.

**Health and safety metrics** [S1-14]

| | |
|---|---|
| Number of fatalities in own workforce as result of work-related injuries and work-related ill health | 0 |
| Number of fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites | 0 |
| Rate of recordable work-related accidents for own workforce (ESRS) | 16.713 |
| Number of recordable work-related accidents for own workforce | 20 |
| Number of Work-related ill health: Fatalities as a re-sult of work-related ill health | 0 |
| Number of Work-related ill health: Cases of recorda-ble work-related ill health | 0 |
| Number of days lost to work-related injuries and fa-talities from work-related accidents, work-related ill health and fatalities from ill health related to employees | 0 |

Incidents related to employee health and safety

**Work-Life Balance Metrics** [S1-15]

| | |
|---|---|
| Percentage of employees entitle to take family-related leave | 100% |
| Percentage of entitled employees entitle who took family-related leave | 5.43% |
| Female entitled employees who took family-related leave | 1.45% |
| Male entitled employees who took family-related leave | 3.98% |

Employees entitled to family-related leave

# CONNECTING THE UNCONNECTED

## ENGAGING COMMUNITIES

Stakeholders view digital transformation, innovation, and connecting the unconnected as top priorities for SES.

In an ever-more connected world, technological innovation is continually progressing. Bridging the digital gap has become a primary focus for both private organisations and governments, with space companies uniquely positioned to enhance the connectivity of isolated communities. This represents a unique opportunity to significantly increase revenues while also providing essential social and health benefits. The 2024 DMA backed this up, showing that stakeholders view digital transformation, innovation, and connecting the unconnected as top priorities for SES.

Key impacts identified include:
- Bridging the digital divide, enhancing connectivity in remote regions. | Providing critical information during emergencies.
- Decreasing the gap between urban and rural areas. | Fostering community integration.
- Enabling disaster recovery through satellite communications. | Supporting affected communities.
- Committing to connect the unconnected with a specific focus on health, socio-economic needs, and education.
- Promoting digital inclusivity and social equity through local engagement and global initiatives.

## ACTIONS

### Digital Inclusion
For billions of people worldwide, access to emergency aid, health, financial services, and education is held back by the lack of what many of us take for granted. Connectivity plays a crucial role in driving economic and social development by bringing these essential services into reach.

Our products and services provide satellite capacity for mobile-based stations, delivering broadband to the most remote and isolated places on earth. We also play a key role in supporting telecommunications clients as they expand their networks. In 2024, SES connected over 1600 sites in more than 40 developing countries.

### Innovating for Disaster Response
Natural disasters, conflicts, and climate change present significant humanitarian challenges, and these are often exacerbated by disrupted connectivity. We leverage our expertise and technology to support communities in crisis, allowing aid and humanitarian efforts to be swiftly coordinated and effectively delivered. The public-private partnership between SES and the Luxembourg government drives two critical services that provide connectivity in disasters and continue to innovate humanitarian responses.

- **Emergency.lu**
  The emergency.lu platform offers rapid communication deployment in response to crises. A collaboration

between the Luxembourg government and three companies including SES, the initiative has supported relief efforts in emergencies across Niger, Chad, Venezuela, Syria, Panama, Grenada, and Union Island.

- **Satmed**
  Owned by the Government of Luxembourg, Satmed is a comprehensive global platform offering e-health applications, secure data storage and management, and satellite connectivity to facilitate telemedicine services in remote areas. It supports various applications including e-health records, health information management, cloud services, e-imaging and radiology, e-learning, and consultancy.

## Giving Back

We believe in empowering our workforce to make a positive contribution to society. Every employee receives two Giving Back days per year to take part in initiatives aimed at improving the wellbeing of local communities – mostly related to digital inclusion, education, fundraising activities for healthcare, and social inclusion. We provide visibility as well as logistical and monetary support to these activities. Employees can also take advantage of a matching donation programme of up to 1000 euros per year. Giving Back initiatives and matching donations pass through internal scrutiny to ensure an appropriate level of due diligence.

Additionally, we organise fundraising activities for communities affected by critical situations and also support high-value customer projects – for example, the provision of free connectivity to Mercy Ships, whose hospital ships provide vital healthcare services to thousands of people in remote regions.

## Targets

We set targets to measure our progress in supporting communities in need. For example, we track both the number of Giving Back days used by employees and the cost of matched donations.

# GOVERNANCE

Robust ethical practice forms the final pillar of our ESG ambitions. Working with integrity, transparency and accountability, we aim to ensure that SES not only meets all legal and regulatory requirements, but also establishes itself as a leader in compliance and business excellence. Our comprehensive approach to corporate governance is designed to maintain integrity and build trust among our stakeholders, while avoiding compliance sanctions and reputational damage. It is founded on stringent anti-corruption and bribery policies, a vigilant stance on risk management, and a culture of integrity and ethical practices at every level.

# MATERIAL IMPACTS, RISKS & OPPORTUNITIES ESRS 2 SBM-3

Our comprehensive approach to corporate governance is designed to maintain integrity and build trust among our stakeholders, while avoiding compliance sanctions and reputational damage. It is founded on stringent anti-corruption and bribery policies, a vigilant stance on risk management, and a culture of integrity and ethical practices at every level.

SES is committed to maintaining the highest standards of business conduct and fostering a strong corporate culture. This section outlines the material impact risks and opportunities associated with our business conduct and corporate culture. By addressing these areas, SES aims to uphold ethical standards, ensure compliance, and build trust among stakeholders.

## Risk: Unethical Business Practices

If SES's or suppliers' employees engage in unethical business practices, this could result in reputational damage, operational disruptions, financial risks and potential legal penalties. If these practices occur in our value chains, the company could face significant challenges in maintaining ethical standards and may face legal penalties. SES does operate in countries with risk of corruption so the continuation of mandatory training and monitoring on ethical business practices remains important.

## Positive Impact: Compliance with Legal and Regulatory Environment (Including ESG Regulations)

SES places great emphasis on compliance with legal and regulatory requirements which reduces our legal risks and enhances operational stability. SES benefits from strong regulatory relationships, while stakeholders experience increased trust in the company. Continued improvements in sustainability requirements of the value chain could additionally reduce risks.

## Opportunity: Corporate Culture Programme

A strong corporate culture supports improved employee engagement and operational performance. SES would benefit from a motivated workforce and enhanced productivity, while employees may experience better job satisfaction.

## Opportunity: Sustainable Supplier Management Programme

A sustainable supplier due diligence process could result in improved supplier practices and reduced risks. SES would benefit from enhanced supply chain transparency and reduced operational risks, while suppliers may experience increased accountability.

# BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE ESRS G1-1

We believe that a strong corporate culture is the foundation of our success. Our corporate culture is established through a clear set of values and principles that guide our actions and decisions. These values are communicated to all employees during onboarding and reinforced through regular training sessions and internal communications. Central to this is our Code of Conduct, which outlines the ethical standards and behaviours expected of all employees.

**Our Code of Conduct and Ethics**

Our Code of Conduct, signed by the CEO of SES, defines our everyday business conduct, offers employees advice, and helps them make the right decisions even in difficult business situations. The Code covers a range of issues including bribery and facilitation; political activities; sanctions; export controls; competition/antitrust; anti-money laundering; intellectual privacy; antiboycott; insider trading; conflicts of interest; fair employment; harassment; contractors and agents; data protection; fundamental rights; the environment; health and safety; and the use of social media.

Many of these topics are also addressed in separate detailed policies.

**SES main ESG policies and regulations**

| | |
|---|---|
| Global Trade Compliance policy | SES Dealing Code |
| Sanctions Compliance policy | Global Data protection policy |
| Code of Conduct | Information security policies |
| Hand-Carry policy | SES AI policy |
| Anti-Corruption and SES Gifts & Entertainment Policy | Tax Transparency Charter |
| Sales Agent policy | SES Corporate Governance Charter |
| SES Antitrust Compliance Policy and Guidelines | SES Remuneration Committee Charter |

Prior to hiring contractors, we provide the party with an appropriate education on the mandatory requirements of our policies and take necessary action, up to and including terminating a contract with a contractor who failed to abide by SES policies. The Code of Conduct is reviewed and consulted with European personnel delegations. We plan to review our Code of Conduct to highlight specifically some of our ESG commitments such as human rights, an updated version will be released in 2024.

All our internal policies related to Business conduct are all applied at a global level and are under the responsibility of the VP of Legal and Regulatory Affairs.

**Net Promoter Score 2024**



-100       44       100
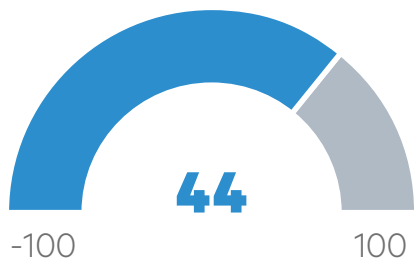
## Customers centricity

Delivering relevant, high-quality, and differentiated customer experiences is essential to our success and keeping customers as the heart of our business is an important part of our corporate culture . SES runs a Voice of the Customer (VOC) programme to ensure the views of this important stakeholder are considered in aspects of our business decisions. The VOC programme is, supported by a dedicated Customer Experience (CX) team – a unique feature in our sector. Central to the VOC programme is the Net Promoter Score (NPS) survey, which includes various surveys at different hierarchical levels and phases of our customer journey.

By continuously collecting and learning from customer feedback, we can consistently enhance our services, creating tailored experiences and unique business value. This feedback is enriched with both quantitative and qualitative data from commercial and operational perspectives, as well as insights from our customer-facing colleagues. This comprehensive approach provides a true and holistic understanding of our customer experience, helping us strengthen our relationships.

In 2024, our corporate NPS was measured at 44, compared to our 3-year moving average of 43, which forms the foundation of our bonus multiplier for all bonus plan-eligible staff. This is a significant testament to our culture and efforts, especially as our NPS continues to rise under challenging circumstances, maintaining a relatively high score.

To further strengthen our customer-centric culture, we have developed a new Customer Centricity (CC) Training programme as of 2024. This initiative promotes better customer engagement among employees and aligns teams with our customer-centric goals. The bonus multiplier linked to NPS performance reinforces our commitment, while Customer Experience Champions play a crucial role in promoting and sustaining our customer-centric culture organisation-wide.

## REMEDIATION AND RAISING CONCERNS G1-1

At SES, we encourage everyone connected to our business activities to 'speak up' through various channels, including the SES Global Compliance Hotline. Managed by the third-party provider Navex, this whistleblowing hotline allows anyone with concerns about SES or its employees or representatives to submit a report securely and confidentially. Issues such as bribery, health and safety, environmental matters, human rights, or any conduct that does not comply with SES business policies or applicable laws and regulations can be reported.

In 2023, as part of our ongoing commitment to compliance and ethics, we enhanced our online Global Compliance Hotline. A key initiative was expanding the hotline to include not only internal stakeholders but also anyone with a concern, including employees, contractors, suppliers, business partners, and third-party individuals, such as employees of SES customers or suppliers. The online Whistleblower tool is available to both SES employees and external workers.

When a report is submitted through any of the reporting channels, it is securely received and managed by a select group of trained compliance personnel. The head of Compliance assigns the report to an appropriate investigation team

based on its nature. This team promptly reviews the report and handles allegations objectively. The company ensures that all reported incidents are acknowledged and investigated without delay. Where necessary, external investigators or auditors are engaged to conduct the investigation, ensuring impartiality and avoiding potential conflicts of interest. In 2024, clear guidelines were established for investigating allegations of corruption or bribery, ensuring that all reports are taken seriously and investigated thoroughly.

We regularly promote awareness of these rights and procedures among employees, and compulsory anti-harassment training is conducted every two years.

Our whistleblower policy prohibits retaliation against any employee who submits a report in good faith or participates in a harassment investigation. SES is subject to legal requirements under national law transposing Directive (EU) 2019/1937, with regard to the protection of whistleblowers.

## Compliance Training G1-1, G1-3

**Mandatory trainings**

GDPR

IT Security

Code of Conduct

Anti-Harassment

Anti-Bribery[1]

Antitrust[1]

Export and Sanctions[1]

1  Mandatory only for the employees working in specific departments

Every two years, all SES employees are required to complete mandatory training sessions covering General Data Protection Regulation (GDPR), Code of Conduct, Harassment Prevention, and IT Security Awareness Foundations.

Four additional mandatory sessions are based on department or role: Sanctions, Anti-Bribery, and Export Compliance, and Antitrust.

Monitored by the SES People & Culture department, these online sessions show an average 83+% completion rate.

Senior executives are required to take the training once every two years. For 2024, 50% have completed it.

**Sustainable Supplier Management Programme G1-2**
At SES, we conduct our business in compliance with all applicable laws and regulations, observing the highest standards of business ethics. We expect all our suppliers to commit to responsible business, social, and environmental practices, conducting their operations in compliance with internationally recognised human rights standards. Our Supplier Code of Conduct is central to

communicating expectations on ethics and compliance, specifically addressing crucial human rights concerns including the prohibition of human trafficking, forced or compulsory labour, and child labour. Our suppliers must comply with relevant local and international regulations covering health and safety, environmental, social, labour, and anti-corruption laws. They must also comply with intellectual property laws and robust data protection standards to foster responsible business practices across the value chain. The policy aligns with international initiatives and standards such as the Fundamental Conventions of the International Labour Organisation; the UN Universal Declaration of Human Rights; the OECD Due Diligence Guidance for Responsible Mineral Supply Chains; and the UN Guiding Principles on Business and Human Rights.

We also actively mitigate the risk of causing or contributing to material negative impacts on value chain workers by requiring suppliers to comply with all relevant laws, including human rights regulations. This expectation is embedded in supplier contracts and ensures that our standards align with legal and ethical guidelines, promoting fair and responsible labour practices across the supply chain.

**Suppliers assessment and Brand accreditation programme:**
To assess and mitigate supply chain risks, in 2023 and 2024 SES conducted a pilot Sustainable Procurement Programme using a third-party tool to assess 86% of vendors. This pilot provided valuable insights for refining procurement processes. A separate ESG research analysis of 81 critical vendors served to identify risks, impacts, and opportunities to support our strategic planning for sustainable business practices.

A worthy initiative was taken by our Brand, Strategy and Development team that, in conducting an accreditation programme of their suppliers during 2023, proactively incorporated ESG criteria into the evaluation. Through the analysis of various documents and a series of interviews, we had the opportunity to engage with these stakeholders and gain a better understanding of what sustainability means to them, their constraints, and the possibilities of their industry.

## PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY G1-3

SES adopts a zero-tolerance approach to bribery and corruption, adhering to all anti-bribery and corruption laws in our operating countries. Our stance on these issues is clearly outlined in our Code of Conduct, Gifts & Entertainment Policy, and Sales Agent Policy.

SES adopts a zero-tolerance approach to bribery and corruption, adhering to all anti-bribery and corruption laws in our operating countries. Our stance on these issues is clearly outlined in our Code of Conduct, Gifts & Entertainment Policy, and Sales Agent Policy. All employees are required to read our Code when they join and also attend mandatory compliance training sessions.

To mitigate the risk of bribery, we have established a clear process for managing gifts and entertainment. All relevant anti-bribery and corruption policies can be accessed on a dedicated intranet page, and employees can seek further guidance via a dedicated email address.

We extend this standard of compliance to our suppliers, business partners, and third parties working on our behalf. In terms of the latter, this includes a thorough risk assessment based on factors such as their country of operation and business type.

Sales functions and other functions engaging with external parties either granting contracts or seeking contracts from SES, as well as external representatives of these functions are the functions that are considered more at risks of corruption and bribery.

## GROUP TAX CHARTER

Responsible business means transparency in our tax strategy, policy, and reporting. We strive to fulfil our tax obligations accurately, punctually, in accordance with the letter and spirit of the relevant tax laws – and always in the spirit of cooperation.

In 2023, we proactively reviewed our legal entity structure and operations in low-tax jurisdictions to eliminate any residual legal entities that no longer serve an ongoing operating or commercial purpose. We file country-by-country tax reports and make certain tax information available in line with the approved EU public Country-by-Country reporting directive. The SES Group Tax Charter can be found on the SES website.

# CYBERSECURITY

**Incidents of corruption or bribery** [G1-4]

| | |
|---|---|
| Number of convictions for violation of anti-corruption laws | 0 |
| Number of convictions for violation of anti-bribery laws | 0 |
| Amount of fines for violation of anti-corruption laws | 0 |
| Amount of fines for violation of anti-bribery laws | 0 |
| Any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery | N/A |
| Percentage of functions at risk covered by training programmes | 100 |

In today's interconnected world, the benefits of enhanced monitoring and tracking against sustainability targets are substantial, yet the risks to data confidentiality, integrity, and availability are becoming an increasing concern. Cybersecurity threats are now regarded as one of the most significant technological risks facing society and organisations alike. SES has strategically built a comprehensive cybersecurity programme over recent years, dedicated to safeguarding its assets and supporting customers as they work to minimise risks to their own operations.

Cybersecurity is prioritised across all areas of SES's business, covering every point from customer hand-off through SES's secure network and ground infrastructure, to satellite transmission, and back down to customer applications at remote sites. The satellite fleet is equipped with encrypted control technology and anti-jamming capabilities, while ground infrastructure is protected by stringent physical access controls and a sophisticated security framework. This framework includes multiple layers of firewalls, antivirus scanning, and intrusion detection and prevention systems. SES's dedicated Security Operations Centre provides 24/7 monitoring, along with advanced incident response capabilities. SES conducts annual external penetration tests and continuously scans for internal vulnerabilities to proactively address potential threats.

At the organisational level, cybersecurity is treated as a strategic priority with Board-level oversight. The Chief Technology Officer, a Senior Leadership Team member, receives direct reports on cybersecurity and, in turn, provides regular updates to both the Audit and Risk Committee and the Board of Directors. SES maintains a specialised Information and Cybersecurity Team of over 20 full-time professionals who execute a multi-year Cybersecurity Strategy called CORE. This strategy is designed to protect SES's assets, services, customers, and stakeholders while adding value to the business. SES has adopted a Zero-Trust framework, ensuring comprehensive protection across data, networks, applications, and user access.

To reinforce cybersecurity at all operational levels, SES has implemented a robust policy framework based on leading cybersecurity standards. This global Information Security Policy, supplemented by domain-specific guidelines, is easily accessible for users throughout the organisation. Additionally, SES supports this framework with extensive company-wide training and regular phishing simulation exercises to build a proactive security culture. SES's Information Security Management System (ISMS) is independently certified to the ISO 27001 standard, and the company's Business Continuity Management System aligns with the ISO 22301-2019 international standard, reflecting its commitment to resilience and security across all functions.

# APPENDIX: ESRS DISCLOSURE REQUIREMENTS

| ESRS Standard | Topic | ESRS Reference | Disclosure Requirement | Materiality | Section |
|---|---|---|---|---|---|
| ESRS 2 | General Disclosures | BP-1 | General basis for preparation of sustainability statements | Material | PREPARING THE CORPORATE SUSTAINABILITY REPORTING DIRECTIVE |
| ESRS 2 | General Disclosures | BP-2 | Disclosures in relation to specific circumstances | Material | PREPARING THE CORPORATE SUSTAINABILITY REPORTING DIRECTIVE |
| ESRS 2 | General Disclosures | GOV-1 | The role of the administrative, management and supervisory bodies | Material | GOVERNANCE (ESG); Information Exchange regarding Corporate Governance; Mission and Composition; Board Governance Structure & Committees; Activities of the Board of Directors in 2024; Activities of the Committees in 2024; Internal Controls over Reporting: Analysis and Oversight; The Audit and Risk Commitee (Corporate Governance) |
| ESRS 2 | General Disclosures | GOV-2 | Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies | Material | GOVERNANCE (ESG); Board Governance Structure & Committees; Internal Controls over Reporting Information: Analysis and Oversight (Corporate Governance Report) |
| ESRS 2 | General Disclosures | GOV-3 | Integration of sustainability-related performance in incentive schemes | Material | GOVERNANCE (ESG); Board Governance Structure & Committees |
| ESRS 2 | General Disclosures | GOV-4 | Statement on due diligence | Material | GOVERNANCE |
| ESRS 2 | General Disclosures | GOV-5 | Risk management and internal controls over sustainability reporting | Material | GOVERNANCE |
| ESRS 2 | General Disclosures | SBM-1 | Strategy, business model and value chain | Material | STRATEGY (ESG); OUR COMPANY; Our business model & priorities; Our clear strategy; Our value chain; Our business segments; SES Networks; SES Media; (Operational and Strategic) |
| ESRS 2 | General Disclosures | SBM-2 | Interests and views of stakeholders | Material | STRATEGY |
| ESRS 2 | General Disclosures | SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | Material | |
| ESRS 2 | General Disclosures | IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities | Material | CLIMATE RELATED MATERIAL IMPACTS, RISKS AND OPPORTUNITIES; Own Workforce: OUR MATERIAL IMPACTS AND RISKS |
| ESRS 2 | General Disclosures | IRO-2 | Disclosure requirements in ESRS covered by the undertaking's sustainability statement | Material | 5 STEPS OF THE DOUBLE MATERIALITY ASSESSMENT |
| ESRS 2/ E1 | General Disclosures/ Climate Change | GOV-3 | Integration of sustainability related performance in incentive schemes | Material | CLIMATE ACTION (Governance) |
| ESRS 2/ E1 | General Disclosures/ Climate Change | SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | Material | CLIMATE RELATED MATERIAL IMPACTS, RISKS AND OPPORTUNITIES |
| ESRS 2/ E1 | General Disclosures / Climate Change | IRO-1 | Description of the processes to identify and assess material climate-related impacts, risks and opportunities | Material | IMPACT, RISK AND OPPORTUNITY MANAGEMENT |
| ESRS E1 | Climate Change | E1-1 | Transition plan for climate change mitigation | Material | Climate Action (STRATEGY) |
| ESRS E1 | Climate Change | E1-2 | Policies related to climate change mitigation and adaptation | Material | Policies related to climate change mitigation and adaptation |
| ESRS E1 | Climate Change | E1-3 | Actions and resources in relation to climate change policies | Material | Actions and resources in relation to climate change policies |
| ESRS E1 | Climate Change | E1-4 | Targets related to climate change mitigation and adaptation | Material | Targets related to climate change mitigation and adaptation |
| ESRS E1 | Climate Change | E1-5 | Energy consumption and mix | Not Material | |
| ESRS E1 | Climate Change | E1-6 | Gross Scopes 1, 2, 3 and Total GHG emissions | Material | Gross Scope 1, 2 and 3 and Total GHG emissions |
| ESRS E1 | Climate Change | E1-7 | GHG removals and GHG mitigation projects financed through carbon credits | Material | GHG removals and GHG mitigation projects financed through carbon credits |
| ESRS E1 | Climate Change | E1-8 | Internal carbon pricing | Material | Internal carbon pricing |

| ESRS Standard | Topic | ESRS Reference | Disclosure Requirement | Materiality | Section |
|---|---|---|---|---|---|
| ESRS E1 | Climate Change | E1-9 | Anticipated financial effects from material physical and transition risks and potential climate-related opportunities | Material | Anticipated Financial Effects and Mitigation Actions |
| ESRS 2/E2 | General Disclosures/Pollution | IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities | Not Material | |
| ESRS E2 | Pollution | E2-1 | Policies related to pollution | Not Material | |
| ESRS E2 | Pollution | E2-2 | Actions and resources related to pollution | Not Material | |
| ESRS E2 | Pollution | E2-3 | Targets | Not Material | |
| ESRS E2 | Pollution | E2-4 | Pollution of air, water and soil | Not Material | |
| ESRS E2 | Pollution | E2-5 | Substances of concern and substances of very high concern | Not Material | |
| ESRS E2 | Pollution | E2-6 | Anticipated financial effects from pollution-related impacts, risks and opportunities | Not Material | |
| ESRS 2/E3 | General Disclosures/Water and Marine Resources | IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities | Not Material | |
| ESRS E3 | Water and Marine Resources | E3-1 | Policies related to water and marine resources | Not Material | |
| ESRS E3 | Water and Marine Resources | E3-2 | Actions and resources related to water and marine resources | Not Material | |
| ESRS E3 | Water and Marine Resources | E3-3 | Targets related to water and marine resources | Not Material | |
| ESRS E3 | Water and Marine Resources | E3-4 | Water consumption | Not Material | |
| ESRS E3 | Water and Marine Resources | E3-5 | Anticipated financial effects from water and marine resources-related impacts, risks and opportunities | Not Material | |
| ESRS 2/E4 | General Disclosures/Biodiversity and Ecosystems | SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | Not Material | |
| ESRS E4 | Biodiversity and Ecosystems | E4-1 | Transition plan and consideration of biodiversity and ecosystems in strategy and business mode | Not Material | |
| ESRS E4 | Biodiversity and Ecosystems | E4-2 | Policies related to biodiversity and ecosystems | Not Material | |
| ESRS E4 | Biodiversity and Ecosystems | E4-3 | Actions and resources related to biodiversity and ecosystems | Not Material | |
| ESRS E4 | Biodiversity and Ecosystems | E4-4 | Targets related to biodiversity and ecosystems | Not Material | |
| ESRS E4 | Biodiversity and Ecosystems | E4-5 | Impact metrics related to biodiversity and ecosystems change | Not Material | |
| ESRS E4 | Biodiversity and Ecosystems | E4-6 | Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities | Not Material | |
| ESRS 2/E5 | General Disclosures/Resource Use and Circular Economy | IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities | Material | Resource Use and Circular Economy: IMPACTS, RISKS AND OPPORTUNITY MANAGEMENT |
| ESRS E5 | Resource Use and Circular Economy | E5-1 | Policies related to resource use and circular economy | Material | Resource Use and Circular Economy: OUR APPROACH AND POLICIES |
| ESRS E5 | Resource Use and Circular Economy | E5-2 | Actions and resources related to resource use and circular economy | Material | Resourse Use and Circular Economy: ACTIONS AND RESOURCES |
| ESRS E5 | Resource Use and Circular Economy | E5-3 | Targets related to resource use and circular economy | Material | Resource Use and Circular Economy: TARGETS AND METRICS |
| ESRS E5 | Resource Use and Circular Economy | E5-4 | Resource inflows | Not Material | |
| ESRS E5 | Resource Use and Circular Economy | E5-5 | Resource outflows | Material | Resource Use and Circular Economy: RESOURCE OUTFLOWS |
| ESRS E5 | Resource Use and Circular Economy | E5-6 | Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities | Not Material | |
| ESRS 2/S1 | General Disclosure/Own Workforce | SBM-2 | Interests and views of stakeholders | Material | STRATEGY: Interests and views of stakeholders |
| ESRS 2/S1 | General Disclosure/Own Workforce | SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | Material | Own Workforce: OUR MATERIAL IMPACTS AND RISKS |

| ESRS Standard | Topic | ESRS Reference | Disclosure Requirement | Materiality | Section |
|---|---|---|---|---|---|
| ESRS S1 | Own Workforce | S1-1 | Policies related to own workforce | Material | Own Workforce: OUR APPROACH AND POLICIES |
| ESRS S1 | Own Workforce | S1-2 | Processes for engaging with own workers and workers' representatives about impacts | Material | Own Workforce: ENGAGING WITH OUR OWN WORKFORCE |
| ESRS S1 | Own Workforce | S1-3 | Processes to remediate negative impacts and channels for own workers to raise concerns | Material | Own Workforce: Remediation channels for own workforce |
| ESRS S1 | Own Workforce | S1-4 | Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions | Material | Own Workforce: ACTIONS; TRAINING AND SKILLS; WORKING CONDITIONS; Health and safety |
| ESRS S1 | Own Workforce | S1-6 | Characteristics of the undertaking's employees | Material | Own Workforce: Employee Workforce |
| ESRS S1 | Own Workforce | S1-7 | Characteristics of non-employee workers in the undertaking's own workforce | Material | Own Workforce: Employee Workforce |
| ESRS S1 | Own Workforce | S1-8 | Collective bargaining coverage and social dialogue | Material | Own Workforce: Collective bargaining coverage and social dialogue |
| ESRS S1 | Own Workforce | S1-9 | Diversity metrics | Material | Own Workforce: Diversity Metrics |
| ESRS S1 | Own Workforce | S1-10 | Adequate wages | Material | Own Workforce: Adequate wages |
| ESRS S1 | Own Workforce | S1-11 | Social protection | Material | Own Workforce: Social protection |
| ESRS S1 | Own Workforce | S1-12 | Persons with disabilities | Material | Own Workforce: Persons with disabilities |
| ESRS S1 | Own Workforce | S1-13 | Training and skills development metrics | Material | Own Workforce: Training and skills development metrics |
| ESRS S1 | Own Workforce | S1-14 | Health and safety metrics | Material | Own Workforce: Health and safety metrics |
| ESRS S1 | Own Workforce | S1-15 | Work-life balance metrics | Not Material | |
| ESRS S1 | Own Workforce | S1-16 | Compensation metrics (pay gap and total compensation) | Material | Own Workforce: Adequate wages |
| ESRS S1 | Own Workforce | S1-17 | Incidents, complaints and severe human rights impacts | Not Material | |
| ESRS 2/ S2 | General Disclosure/Workers in the Value Chain | SBM-2 | Interests and views of stakeholders | Not Material | STRATEGY |
| ESRS 2/ S2 | General Disclosure/Workers in the Value Chain | SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | Not Material | |
| ESRS S2 | Workers in the Value Chain | S2-1 | Policies related to value chain workers | Not Material | |
| ESRS S2 | Workers in the Value Chain | S2-2 | Processes for engaging with value chain workers about impacts | Not Material | |
| ESRS S2 | Workers in the Value Chain | S2-3 | Processes to remediate negative impacts and channels for value chain workers to raise concerns | Not Material | |
| ESRS S2 | Workers in the Value Chain | S2-4 | Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action | Not Material | |
| ESRS S2 | Workers in the Value Chain | S2-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | Not Material | |
| ESRS 2/ S3 | General Disclosure/ Affected Communities | SBM-2 | Interests and views of stakeholders | Not Material | |
| ESRS 2/ S3 | General Disclosure/ Affected Communities | SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | Not Material | |
| ESRS S3 | Affected Communitites | S3-1 | Policies related to affected communities | Not Material | |
| ESRS S3 | Affected Communitites | S3-2 | Processes for engaging with affected communities about impacts | Not Material | |
| ESRS S3 | Affected Communitites | S3-3 | Processes to remediate negative impacts and channels for affected communities to raise concerns | Not Material | |
| ESRS S3 | Affected Communitites | S3-4 | Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions | Not Material | |
| ESRS S3 | Affected Communitites | S3-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunitieS | Not Material | |

| ESRS Standard | Topic | ESRS Reference | Disclosure Requirement | Materiality | Section |
|---|---|---|---|---|---|
| ESRS 2/S4 | General Disclosure/ Consumers and End-Users | SBM-2 | Interests and views of stakeholders | Not Material | |
| ESRS 2/S4 | General Disclosure/ Consumers and End-Users | SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | Not Material | |
| ESRS S4 | Consumers and End-Users | S4-1 | Policies related to consumers and end-users | Not Material | |
| ESRS S4 | Consumers and End-Users | S4-2 | Processes for engaging with consumers and endusers about impacts | Not Material | |
| ESRS S4 | Consumers and End-Users | S4-3 | Processes to remediate negative impacts and channels for consumers and end-users to raise concerns | Not Material | |
| ESRS S4 | Consumers and End-Users | S4-4 | Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions | Not Material | |
| ESRS S4 | Consumers and End-Users | S4-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | Not Material | |
| ESRS 2/G1 | General Disclosure/ Business Conduct | GOV-1 | The role of the administrative, supervisory and management bodies | Material | GOVERNANCE |
| ESRS 2/G1 | General Disclosure/ Business Conduct | IRO 1 | Description of the processes to identify and assess material impacts, risks and opportunities | Material | GOVERNANCE: MATERIAL IMPACTS, RISKS & OPPORTUNITIES |
| ESRS G1 | Business Conduct | G1-1 | Corporate culture and Business conduct policies and corporate culture | Material | GOVERNANCE: BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE |
| ESRS G1 | Business Conduct | G1-2 | Management of relationships with suppliers | Material | Governance: Sustainable Supplier Management Programme |
| ESRS G1 | Business Conduct | G1-3 | Prevention and detection of corruption and bribery | Material | Governance: COMPLIANCE TRAINING; PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY |
| ESRS G1 | Business Conduct | G1-4 | Confirmed incidents of corruption or bribery | Material | GOVERNANCE: Incidents of corruption or bribery |
| ESRS G1 | Business Conduct | G1-5 | Political influence and lobbying activities | Not Material | |
| ESRS G1 | Business Conduct | G1-6 | Payment practices | Not Material | |

# APPENDIX: DMA EXHAUSTIVITY AND GAP ASSESSMENT

As stated, the 2024 double materiality assessment (DMA) has provided a strong foundation for our sustainability and non-financial reporting strategy, allowing us to identify and prioritise topics that exert a significant influence over our organisation. At the same time, the assessment noted key limitations in data completeness, as well as identifying the evolving significance of certain topics that are critical to thorough reporting.

## KEY OBSERVATIONS AND IDENTIFIED GAPS

### Inadequate data for material topic reporting

The DMA identified some topics as material that we have not previously identified. This is due to potential environmental and health impacts and to growing regulatory scrutiny.

SES has identified the following challenges in providing a comprehensive account of those topics:

- **Internal data collection:** The lack of a centralised system for gathering and quantifying pollution metrics such as emissions data across operations, air pollutants beyond $CO_2$, and other waste byproducts.
- **Supplier and partner data gaps:** Due to limited air pollution data from suppliers and partners, our current reporting only partially represents the broader environmental impact of our operations and value chain.
- **Lack of benchmark data for validation:** The absence of robust, pollution-specific benchmarks or industry comparisons affects our ability to accurately assess our air pollution footprint relative to industry standards.

### Impact on Reporting

Without adequate data, our air pollution reporting remains underdeveloped. This could potentially lead to reputational risks, misalignment with stakeholder expectations, and challenges in meeting emerging regulatory requirements.

### Evolving materiality: On-going Assessment

Some topics currently classified as non-material, such as water, changes in the environmental landscape, and regulatory

standards could become increasingly significant, particularly in the context of operational efficiency and environmental impact.

Again, the DMA identified a number of challenges that limit reporting of these topics:

- Absence of data collection infrastructure: Since water use is not material, there is limited infrastructure for tracking and reporting water consumption across our operations.
- Lack of risk and impact assessment: Without an in-depth understanding of water's potential material impact, we risk being underprepared should

water become a material topic in the future – particularly in areas experiencing water scarcity.

- Emerging stakeholder and regulatory expectations: As water scarcity issues intensify, stakeholders and regulators may expect SES to account for and report on water-related impacts, even if only precautionary.

**Impact on Reporting**

Failure to proactively address water-related impacts could result in our reporting being perceived as incomplete or reactive, rather than forward-looking and responsive to emerging environmental concerns.

# MITIGATION MEASURES AND ACTION PLAN

To address these gaps, SES plans to widen the scope of our DMA by developing data infrastructure, strengthening monitoring systems, and establishing a continuous materiality reassessment process.

## AIR POLLUTION DATA INFRASTRUCTURE ENHANCEMENT

**Objective:** Establish and refine robust data systems for air pollution tracking to capture comprehensive metrics and address a key gap in our DMA.

**Key Actions:**

- Internal data collection system development: Deploy systems to capture comprehensive pollution data, including $CO_2$ equivalents, particulate matter (PM), volatile organic compounds (VOCs), and other operational pollutants across SES facilities.
- Supplier and partner data collection protocol: Introduce new data-sharing protocols with leading suppliers to improve transparency across the value

chain. This will involve setting clear guidelines on data frequency, quality, and reporting standards.

- Industry benchmarking and analysis: Conduct an annual pollution benchmarking study to compare SES pollution data with industry standards. This will help to contextualise performance and identify best practices for pollution management.

**Outcome:**

By the end of 2025, SES will have established a reliable baseline for pollution data encompassing internal and external sources, accurate disclosures, and alignment with regulatory requirements.

# MATERIALITY REVIEW MECHANISM FOR EMERGING TOPICS

**Objective:** Develop a proactive framework to regularly reassess material topics, particularly regarding evolving concerns like water usage and scarcity.

**Key Actions:**

- Bi-annual materiality assessment review: Establish a bi-annual review process to capture any shifts in stakeholder expectations or regulatory standards, with a particular focus on water and climate-related metrics.
- Water impact pilot study: Conduct an initial water impact study, assessing our water footprint across different regions to identify high-risk areas that could affect future operations or compliance.
- Scenario planning for water-related risks: Develop scenario analyses to evaluate potential impacts if water becomes a material issue, including risk to operations in water-scarce regions and possible financial implications.

**Outcome:**

A responsive and dynamic materiality assessment process that enables SES to pre-emptively address emerging issues and adapt reporting scopes as necessary.



# ENHANCED STAKEHOLDER ENGAGEMENT AND TRANSPARENCY GAP REPORTING

**Objective:** Improve alignment with stakeholder expectations through regular engagement sessions, industry benchmarking, and transparently reporting identified gaps.

**Key Actions:**

- Stakeholder engagement sessions: Conduct bi-annual consultations with key stakeholders including investors, regulatory bodies, and environmental advocates to validate our approach to material topics and obtain insights into emerging expectations.
- Comprehensive benchmarking against peers: Benchmark our DMA framework against industry peers with a focus on data completeness, emerging material topics, and transparency to stay aligned with best practices.
- Gap and limitation transparency in annual reporting: In the non-financial report, disclose limitations around material topics like pollution and water, with a dedicated section that communicates plans to bridge these gaps.

**Outcome:**

Increased stakeholder trust and engagement through proactive disclosure and transparency in DMA-related limitations.

**SES HEADQUARTERS**

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**SES**