

Luxembourg, 18 June 2025

Environmental and Social Data Sheet

Overview

Project Name:	DIGITAL GRAVITY PARTNERS I (DGP)
Project Number:	2024-0754
Country:	Regional - EU countries
Project Description:	Pan-European digital infrastructure fund focusing on data centres, fibre and wireless.
EIA required:	yes
Project included in Carbon Footprint Exercise ¹ :	no

(details for projects included are provided in section: “EIB Carbon Footprint Exercise”)

Environmental and Social Assessment

Environmental Assessment

The operation concerns the participation of the EIF in the “Digital Gravity Partners I Fund”, a single sector fund focused on digital infrastructures pursuing investments mainly in data centres, fibres and wireless networks predominantly in Europe and selectively in the UK and North America. The Fund prioritizes sustainability by investing in assets that contribute to decarbonization, energy efficiency, and digital inclusivity.

Investments will focus on projects that reduce carbon emissions, improve the use of renewable energy and bridge the digital divide as well as to build highly sustainable data centres. Moreover, the Fund will seek to promote energy efficiency in the development of its data centres and to implement the best practices laid out in the European Code of Conduct for Data Centre Energy Efficiency.

The Fund Manager has opted to classify the Fund as an Article 8 Fund under the EU Regulation 2019/2088 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosure Regulation or SFDR).

The potential environmental and social (E&S) impacts associated with the Fund’s investments typically include occupational health and safety, labour and working conditions, resource efficiency, pollution prevention, stakeholder engagement and grievance management.

The E&S impacts of the Fund’s investments are likely to be limited when appropriately designed and operated. While most of the investments do not fall under Annex I or II of the EIA Directive 2011/92/EU amended by the Directive 2014/52/EU, national competent authorities determine the need for a full EIA for some investments such as Data Centres. If an underlying investment is subject to an EIA, the Fund Manager will be required to publish the related documentation on its website. and ensure that the investment incorporated all mitigating measures recommended as a result of the EIA.

¹ Only projects that meet the scope of the Carbon Footprint Exercise, as defined in the EIB Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: 20 000 tonnes CO2e/year absolute (gross) or 20 000 tonnes CO2e/year relative (net) – both increases and savings.



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As a condition to the first drawdown, the Fund Manager has to develop its ESG framework, supported by an Environmental and Social Management System (ESMS) in line with the EIBG's environmental and social requirements. Throughout the investment cycle, one of the senior partners will be the ultimate responsible for the ESMS and has a veto right regarding environmental and social matters in the Fund's Investment Committee.

The Fund Manager will be required to verify that none of the schemes have a significant negative impact on any site of nature conservation importance, including sites protected under the "Habitats" and "Birds" Directives (92/43/EEC and 2009/147/EC respectively) and the associated Natura 2000 network, Water Framework Directive (2000/60/EC), national legislation and international agreements. If in the reasonable view of the Fund Manager an investment has the potential to significantly affect sites of nature conservation importance, it shall be ensured that an appropriate assessment is carried out for the potentially affected sites, and obtain written confirmation from the competent authority as defined in the relevant EU Directives, or an equivalent assessment satisfactory to the EIF, that the investment does not have a significant negative impact on any protected site.

The legal documentation to be concluded between the Fund and the EIF will include an obligation on the Fund to ensure that all projects comply with national and European legislation where applicable, as well as the EIB's E&S standards.

The Fund operates under a Sustainable Connectivity Policy that serves as its ESG framework foundation. This policy is fully integrated into the Fund's investment lifecycle, ensuring compliance with high environmental, social, and governance (ESG) standards and alignment with its Sustainable Connectivity Mandate. This mandate prioritises investments in digital infrastructure that contribute to a low-carbon, climate-resilient future, ensuring consistency with pathways towards net-zero emissions. The policy incorporates principles from international frameworks, such as the UN Sustainable Development Goals (SDGs), the EU Taxonomy, and SFDR Article 8 requirements.

The Fund integrates sustainability into its investment strategy, ensuring alignment with the Paris Agreement (as outlined in the European Investment Bank Climate Bank Roadmap, Annex 2) and the EU Taxonomy, particularly regarding the "Do No Significant Harm" (DNSH) requirements. Below is an overview of the Fund's approach for each key sector.

1. Data Centres

- Paris Alignment: DGP aligns with the Climate Neutral Data Centre Pact (CNDCP), committing to making data centres climate neutral by 2030. This includes setting clear metrics like Power Usage Effectiveness (PUE ≤ 1.30 in cool climates) and transitioning to 100% renewable energy sources. Investments prioritise low-emission operations, including water conservation through advanced cooling systems and heat reuse for community heating.
- Taxonomy Alignment (DNSH): DGP ensures compliance by conducting rigorous due diligence on Scope 1, 2, and 3 emissions. Measures include improving energy efficiency, water conservation, and promoting circular economy principles through the reuse of hardware and minimising waste.

2. Fibre Networks

- Paris Alignment: Investments in fibre networks focus on energy efficiency and enabling low-carbon connectivity solutions. DGP prioritises deployment strategies that minimise environmental impact, such as utilising existing infrastructure where possible.
- Taxonomy Alignment (DNSH): Fibre projects are assessed for lifecycle sustainability, including emissions from construction, operations, and end-of-life phases. Renewable energy sourcing and responsible supply chain practices are emphasised.



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3. Wireless Networks (5G)

- **Paris Alignment:** Wireless investments are designed to support low-latency applications while minimising energy consumption through advanced network planning and energy-efficient technologies. DGP ensures 5G deployment is scalable and sustainable by working with neutral-host solutions to reduce redundancy and infrastructure duplication.
- **Taxonomy Alignment (DNSH):** DGP evaluates the lifecycle emissions of wireless networks, focusing on reducing environmental harm during infrastructure deployment and maintenance phases. Initiatives like small-cell deployments reduce energy consumption and visual pollution compared to traditional macro cells.

EIB Paris Alignment for Counterparties (PATH) Framework

The Fund Manager has more than EUR 500 M of assets under management. As such, the Fund Manager is in scope of and screened in the PATH framework. Hence, the EIF will require the Fund Manager to report – at the latest 12 months after signature – in line with the TCFD2 recommendations, including in particular information in relation to transition and physical climate risk...

Social Assessment

The Fund adheres to social standards aligned with its Sustainable Connectivity Policy, ensuring that investments uphold fundamental principles in human rights, labour practices, and social equity.

The Fund has established a Diversity Equity and Inclusion (DEI) policy. It ensures that all employment decisions are based on merit and legitimate business needs, without discrimination based on protected characteristics such as race, gender, or disability. The policy aims to create a work environment free from discrimination, harassment, or victimization, covering all aspects of the working relationship, including recruitment, pay, training, and termination. It also emphasizes the Employer's commitment to diversity and anti-discrimination, promoting effective communication and consultation with staff regarding equal opportunities.

Other Environmental and Social Aspects

The Fund will use the following metrics to assess and manage climate-related risks:

Zero Emissions:

- **Scope 1, 2, and 3 Emissions:** DGP tracks emissions across all levels of operations and aims for a trend towards net zero.
- **Renewable Energy Usage:** Portfolio assets are targeted to achieve 100% renewable energy consumption where feasible.
- **Efficiency Metrics:** Metrics such as Power Usage Effectiveness (PUE ≤ 1.30 in cool climates; ≤ 1.40 in warm climates) and Carbon Usage Effectiveness (CUE) are used to ensure operational efficiency.

Zero Waste:

- **Water Usage Effectiveness (WUE):** Aims to trend towards zero waste in water-intensive operations.
- **Energy Reuse Factor:** A target of reusing over 25% of waste heat in data centres supports sustainability and efficiency objectives.

Zero Inequality:

- Metrics to improve digital inclusivity, such as growth in network capacity, network uptime, and latency improvements, are closely monitored.

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Conclusions and Recommendations

The Bank's environmental and social requirements have been shared with the Fund Manager and, during appraisal, it has been verified that the Fund Manager is willing and capable to fully implement them at Fund level but also at portfolio company level.

The capacity of the Fund Manager to manage and monitor E&S related aspects of the operation is deemed adequate. In summary, the Fund Manager will be required to fulfil the following contractual conditions:

1. Prior to first drawdown the Fund Manager will further develop its ESMS to the satisfactory of the EIBG and in line with its environmental and social standards, including the creation of a communication mechanism for external stakeholders as part of the Grievance Mechanism.
2. The fund manager will publicly report in line with the TCFD recommendations, within 12 months of the Fund closing.
3. The Fund Manager shall recruit an ESG expert and/or seek external support from a technical partner or a specialised consultant with sufficient experience in the aforementioned areas of the ESMS to be developed.

In view of the above findings and conditions, the operation is deemed satisfactory from an environmental and social compliance perspective.