



GDS万国数据

2025 SUSTAINABILITY REPORT

CONNECTING A SMART INFRASTRUCTURE PLATFORM TO A SUSTAINABLE FUTURE

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About this Report

We are pleased to present the GDS 2025 ESG Report. This marks the sixth ESG report released by GDS (hereinafter referred to as "the Report"). It outlines GDS's progress and performance in 2025 across key areas such as environmental stewardship, social responsibility, and corporate governance. It is intended to keep all stakeholders informed of our actions, outcomes, and ongoing commitment to sustainable development.

Reporting Format

This Report is published in both Chinese and English in electronic format. The Report can be viewed and downloaded from the Company's official website. URL: <https://www.gds-services.com/>

Reporting Standards

This Report has been prepared with reference to disclosure standards and frameworks, such as the *GRI Sustainability Reporting Standards* (GRI Standards) issued by the Global Sustainability Standards Board (GSSB), the *SASB Standards* issued by the Sustainability Accounting Standards Board (SASB), the *ESG Reporting Guide 2.0* issued by Nasdaq and the *Environmental, Social and Governance Reporting Code* issued by the Hong Kong Exchanges and Clearing Limited (HKEx).

Reporting Scope

Unless otherwise specified, the data and information disclosed in this Report cover the period from January 1, 2025, to December 31, 2025. Some content may extend beyond this timeframe where relevant. The scope of this Report includes GDS Holdings Limited and its consolidated subsidiaries, consolidated variable interest entities (VIEs), and other affiliated companies.

External Assurance

GDS commissioned Bureau Veritas Certification (Beijing) Co., Ltd. to perform an independent third-party assessment of this Report and to issue a statement of assurance.

Notes on Information

All data presented in this Report is derived from GDS's internal records and corporate documents, unless otherwise stated. All monetary figures are expressed in RMB, unless otherwise stated. GDS assumes full responsibility for ensuring the authenticity, accuracy, and completeness of the information disclosed in this Report.

Reference Notes

Unless otherwise indicated, "GDS Holdings Limited" is also referred to in this Report as "GDS", "the Company", "the Group" or "we". GDS Holdings Limited is a limited liability company incorporated in the Cayman Islands on December 1, 2006. Depending on the context, these terms may also refer to its consolidated subsidiaries, affiliated entities, variable interest entities (VIEs), and their subsidiaries.

Contact Us

For any feedback or suggestions regarding this Report, please email us at esg@gds-services.com. For more information, please visit our website: <https://www.gds-services.com/>.

Message from CEO

Artificial Intelligence is transitioning from generative models to Agentic AI systems with autonomous planning and decision-making capabilities. As AI agents scale, computing power has become the core production factor of the digital economy. However, each computing power surge is closely linked to the energy system’s readiness. Data centers, as critical infrastructure for computing, face unprecedented challenges of securing energy sources. According to the International Energy Agency (IEA), global electricity consumed by AI data centers rose by 50% year-on-year in 2025 and is expected to triple by 2030.

In response to these challenges, China is actively building an integrated national computing power network synergizing with the pathway of power grid development. Aligned with national policy, we are positioning our business in both established markets and new locations, matching diverse needs of clients. In western emerging hubs such as Inner Mongolia and Ningxia, we are building gigawatt-scale green cluster powered by local wind and solar resources. In mature markets including Beijing-Tianjin-Hebei, the Yangtze River Delta, and the Greater Bay Area, we are deploying low-latency inference infrastructure to support end users and industrial ecosystems.

Driving Innovation, Fulfilling Our Green Commitment

Fully acknowledging the sustainability challenges faced by our industry, we have integrated ESG principles into our strategy and operations. Through the Smart DC¹ infrastructure matrix to Lighthouse Data Center

¹ See details in Innovation – Next-Generation Infrastructure Solutions.

Project, we are advancing data center operations toward greater intelligence while supporting green computing.

We commit to achieving operation carbon neutrality by 2030. This ambitious target is aligned with Paris Agreement and has been validated by Science Based Target initiative (SBTi). In 2025, our data centers achieved an average PUE of 1.23, maximizing the computing power of each kilowatt-hour. We are also building circular economy models for water, waste heat, and waste. On the energy front, we are continuously expanding renewable energy sources. Direct green power supply is being incorporated into the planning of new projects, further advancing our clean energy transition. We will continue to explore integrated energy solutions and zero-carbon data center campuses to support China’s dual carbon goals.

Strengthen Governance, Building an Ecosystem with Shared Value

To address the challenges of the AI era, we are strengthening our safeguards by upholding rigorous compliance and security standards, and establishing a comprehensive compliance framework. Our intelligence Security Operation Platform helped maintain zero major data security or privacy incidents in 2025. We filed 50 new patents during the year, reinforcing our technological capabilities.

We continue to invest in talent development through structured programs and training initiatives. Externally, we remain committed to social impact. In 2025, we participated in the “99 Charity Day”

campaign for the fourth consecutive year, fundraising for children in need. Through our partnership with Buy42, employees developed a digital donation management system that has processed over 220,000 items, supporting employment opportunities for people with disabilities.

As a leading digital infrastructure provider in China, we are committed to building next-generation computing power infrastructure that creates commercial value while generating positive environmental outcomes.



William Wei Huang
Chairman and CEO of GDS
July 2026



Our Business Overview

The rapid growth of generative AI and large language models is driving exponential demand for computing power. With strong policy support, China’s AI industry is expanding rapidly, placing the data center sector in a period of significant growth.

GDS is a leading high-performance data center operator and service provider in China. With 25 years of experience, the Company delivers secure, reliable, and efficient computing infrastructure to its customers.

To capture the opportunities presented by the AI era, GDS has established a business layout covering both established markets and new locations. Its computing infrastructure platform spans first-tier cities and surrounding areas, including Beijing, Shanghai, Guangzhou, and Shenzhen, while also strategically positioning in national integrated computing hubs such as Zhongwei, Ulanqab, and Horinger. Leveraging its track record of securing and serving leading cross-industry customers, robust financial position, rapid digital-intelligence-aligned design capabilities, and optimized operational expertise, GDS aligns its site selection and service delivery capabilities with customers’ diverse computing requirements.



53

Northern China
Beijing, Langfang, Zhangbei, Huailai, Tianjin, Ulanqab, Horinger, Zhongwei

30

Eastern China
Shanghai, Kunshan, Changshu, Nantong, Taicang

14

Southern China
Guangzhou, Shenzhen, Huizhou, Shaoguan

4

Central and Southwestern China
Chengdu, Chongqing, Wuhan

*According to the Company’s Q1 2026 quarterly report

Data centers deployed nationwide²

101

Data center footprint³

792,680 m²

IT capacity in operation

1,538 MW

Contracted capacity⁴

5,600 MW

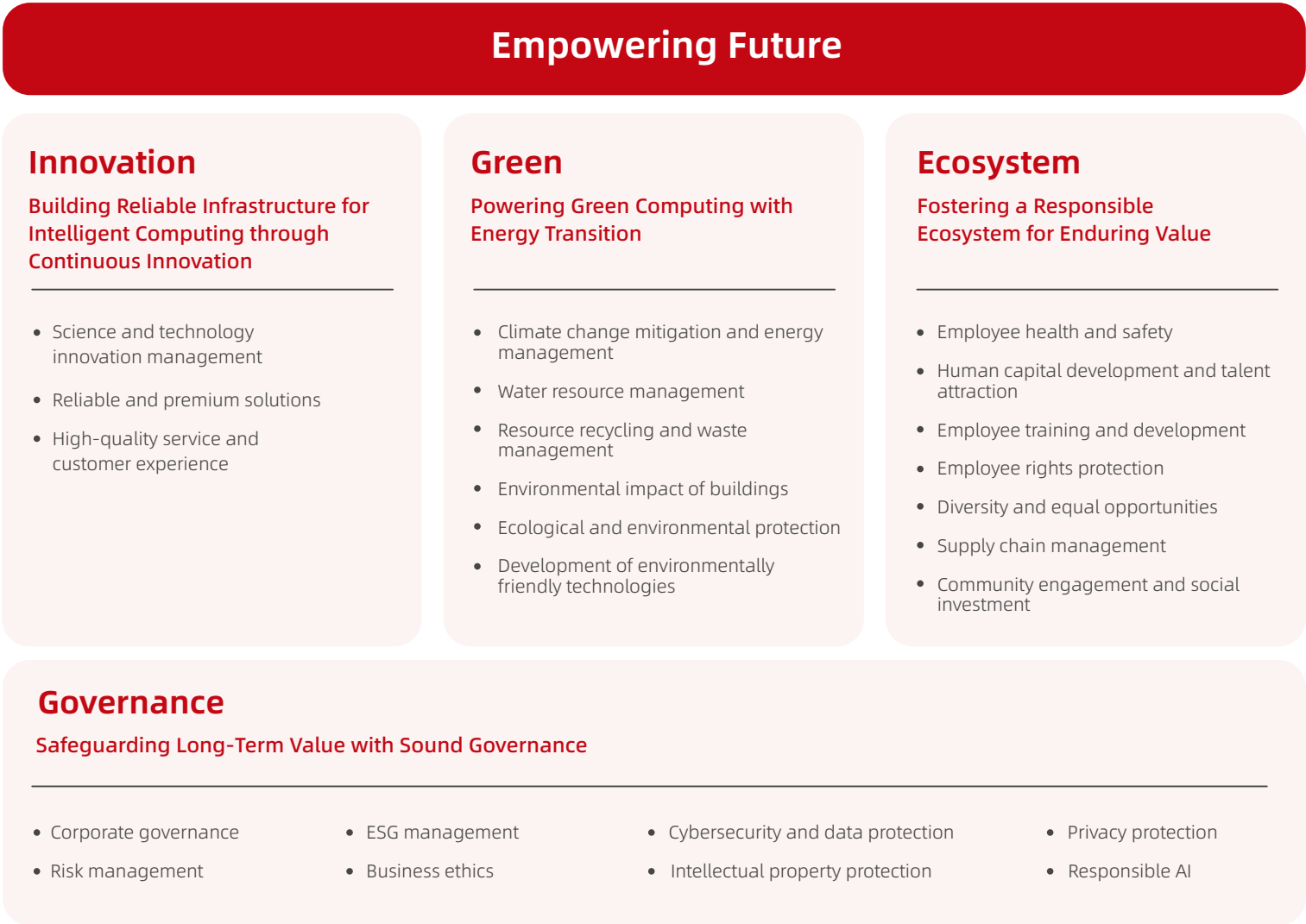
²Includes 79 operational, 12 BOT (Build-Operate-Transfer), and 10 under construction.

³Includes production area of 674,269 m² and areas under construction of 118,411 m².

⁴Includes 1,538 MW of operational capacity, 377 MW of capacity under construction and approximately 3,700 MW of land with secured power allocation quotas, as well as land reserves specifically set aside by local governments for our future data center development.

Sustainability Strategy

Guided by "Empowering Future," GDS integrates sustainability into the core of our business strategy. We deliver intelligent infrastructure through **Innovation**, drive decarbonization through **Green** operations, cultivate responsible **Ecosystems** through collaboration, and uphold trust through robust **Governance**. Together with our stakeholders, we are building a more efficient, low-carbon, and sustainable digital future.



Executive Summary

In 2025, GDS advanced its sustainability agenda across four strategic pillars: Innovation, Green, Ecosystem, and Governance. We pursue operation excellence through intelligent innovation, embed low-carbon and circular practices into our computing infrastructure, engage ecosystem partners through shared responsibility, and anchor our growth in trust-based governance. GDS remains committed to serving as a trusted infrastructure partner in the digital economy.

Innovation

Building Reliable Infrastructure for Intelligent Computing through Continuous Innovation

GDS aligns the strategic development with evolving demands from the intelligent era. We provide reliable digital infrastructure, supporting our clients through enhanced customer service and continuous innovation.



Customer Experience

Adopting a customer-centric approach, GDS leverages intelligent technical support and systematic services to ensure high-quality delivery. In 2025, the Company established a dedicated Customer Operation Center and introduced a customized service model. By optimizing the full-cycle service from demand alignment, on-site deployment, operations and maintenance (O&M) response to after-sales follow-up, the Company has been able to address the diverse needs of customers across different segments. The monthly Star-Rating Evaluation self-assessment program, in place for seven years, now covers more than 70 data centers nationwide. We conduct standardized reviews across multiple indicators, including infrastructure O&M performance and service response timeliness, to drive continuous improvement in overall service quality. To further enhance efficiency, GDS has integrated digital intelligence capabilities—including automated email parsing, intelligent ticket classification, and form pre-filling, enabling customer requests to be processed within seconds at an accuracy rate exceeding 95%.

⁵GDS builds an integrated intelligent operation and maintenance system for the data center operations 4.0 era. It uses digital intelligence as the decision-making command center. Security strategies serve as the constraint framework. Sensors and controllers act as the execution terminals.

Smart DC and our Delivery Radar Platform

Amid exponential growth in the demand for AI computing, GDS expands the Smart DC product matrix. Encompassing three series: Agile Delivery, Low Carbon, and Digital Intelligence, modular solutions are deployed to address diverse market needs. To enable lifecycle transparency, GDS launched the Delivery Radar Platform, which tracks data centers end-to-end from planning, construction to delivery and operation. Its built-in intelligent risk scanning identifies potential issues early, ensuring projects meet target outcomes.

DC Operation Excellence

GDS launched the Lighthouse Data Center Project to align with the global Lighthouse Factory standards. The Company builds a data center management system across five dimensions: productivity, supply chain resilience, customer centricity, sustainability, and talent development. Driving data center operations toward the 4.0 era⁵ and delivering ultimate operational efficiency, GDS is piloting in-house developed technologies across its campuses, including the self-developed Industrial-grade Smart Terminals for cooling system optimization, closed-circuit television (CCTV) risk detection, robotic patrol dog, and the Emergency Drill Alert Platform. Digital intelligence further enables ultimate operational efficiency while maintaining the accident rate per 10,000 operating hours at 0.006⁶. These measures ensure stable infrastructure operations and uninterrupted service delivery.

Fostering Innovation Culture

GDS drives organizational innovation through a suite of initiatives. We run an annual patent invention competition, which accelerates the conversion from innovative ideas to commercial value. Ongoing industry-academia-research collaborations with leading universities enable technical teams to stay at the forefront of AI, liquid cooling, and other emerging technologies.

The Pixel Campaign, a company-wide initiative encouraging employees to identify digital intelligence optimization opportunities across business scenarios, helps transform distributed ideas into tangible outcomes—fostering a bottom-up innovation culture.

⁶Calculated using the accident rate per 10,000 operating hours in the aviation industry: Annual total number of accidents/annual total operating hours of the data center/10,000 (the annual operating hours of a single center are 8,760, and if one accident occurs, the rate is 1.14).

Green

Powering Green Computing with Energy Transition

GDS drives the green computing transformation through technological innovation, operational optimization, and decisive climate action.

Advancing Toward Net Zero Across the Value Chain

GDS obtained Science Based Targets initiative (SBTi) validation for its value chain net-zero target, positioning the Company as a climate action benchmark for the industry. Committed to achieving carbon-neutral operations by 2030, the Company keeps pursuing excellence in energy management and increasing renewable energy adoption. Toward the goal of 100% renewable energy use by 2030, the Company pursues a diversified energy strategy. We build Distributed Photovoltaic (DPv) facilities wherever feasible, with 2.05 MW capacity installed and operational. On top of it, GDS advances Direct Green Power Connection (DGPC) while scaling long-term Power Purchase Agreements (PPAs), Direct Power Purchase (DPP), and Renewable Energy Certificates (RECs). These efforts lifted the share of renewables in the energy mix to over 60%. Implementing supplier carbon management programs for years, GDS plans to strengthen tiered supplier management and upstream decarbonization engagement. These steps advance net-zero goals across the whole value chain.

In 2025, GDS's operational GHG emissions (Scope 1 and 2)⁷ totaled 1,316,725 tCO₂e, a 9.34% decrease compared to the previous reporting year. Value chain GHG emissions (Scope 3) totaled 570,892 tCO₂e, a 44.45% decrease compared to the previous reporting year.

Excellence in Energy Management

GDS improves energy efficiency through precision operations, energy-saving retrofits, and intelligent optimization. The Company embeds the “8,760-hour Operation Excellence” initiative in its energy management platform. Intelligent scheduling and 24/7 real-time monitoring ensure the data center operates at its peak efficiency. The Hybrid Air-Liquid Dual-Coil Cooling System has been deployed in multiple data centers, improving energy efficiency by 8-10% compared with traditional designs. GDS scales Self-developed Industrial-grade Smart Terminals across more than twenty data centers nationwide. Through second-level data collection and minute-level autoregulation, our closed-loop energy management system drives optimal energy efficiency. Annual electricity saving exceeds 50,000 MWh.

In 2025, the average Power Usage Effectiveness (PUE) of GDS data centers⁸ reached 1.23, marking steady progress toward the 1.20 target by 2030.

Promoting Circular Economy

The Company prioritizes resource conservation and recycling. We have established a circular economy model covering energy, water and waste through all data center operations.

Waste Heat Recovery: GDS repurposes waste heat generated by data halls to provide heat for office spaces and battery rooms. Beyond self-use, selected data centers can provide surplus heat to other companies within the industrial park. Annual waste heat recovery nationwide exceeds 300GWh. Delivering environmental benefits equivalent to saving the annual electricity consumption of approximately 100,000 households.

Water Stewardship: We emphasize source reduction and end-of-life recycling. For projects in water-scarce regions, the Company promotes dry cooling or zero-water cooling technologies to reduce local water stress. We deploy Reverse Osmosis (RO) technology and electronic sterilization systems at scale and apply rainwater harvesting and graywater reuse to improve Water Usage Effectiveness (WUE).

Innovative Pilots: GDS launched a few innovative circular economy initiatives. We recover kitchen waste oil and convert it into biodiesel for emergency power supply, reducing lifecycle emissions by 90% compared to conventional diesel. The Company has also established a specialized recycling program for end-of-life batteries, achieving 100% recycling of waste lead-acid batteries in 2025.

⁷ Scope 2 emissions are calculated using the market-based method.

⁸ Data centers that come into operation after 2020, with utilization rate ≥ 30%, and with new technology and architecture applied.

Ecosystem

Fostering a Responsible Ecosystem for Enduring Value

The Company’s long-term success is deeply tied to value creation for its employees, partners, and the communities where we operate. To this end, GDS has been refining the responsibility ecosystem, working alongside stakeholders to co-develop a sustainable development framework.

Talent Development

Talent is the core driving force behind the Company’s long-term value creation and sustainable development. We adhere to the core values of "integrity, humility, driven, empathy, and honesty", and advocate for the principles of putting customer first, accountability, entrepreneurial spirit and entrepreneur mindset.

Against shifts in business models and competency requirements brought by AI technological development, the Company continues to improve its human resources management system covering talent cultivation and recruitment, competitive and fair compensation, organizational culture, and diversity and equal opportunity, to support employees’ continuous growth and drive the organizational improvement in efficiency.

Employee Rights, Health & Safety

In 2025, the Company’s Total Recordable Incident Rate (TRIR) was 0.054. The employee satisfaction survey score reached 90+.

GDS updated the *ESG Policy* and *GDS Employee Handbook* to clearly define provisions governing human rights, labor rights protection, anti-discrimination, and anti-harassment. We respect and safeguard employees’ rights to freedom of association.

GDS implements systematic occupational health and safety risk management in alignment with the ISO 45001 framework, with performance indicators demonstrating steady improvement. The company strictly enforces operational safety standards and mandatory personal protective equipment (PPE) protocols. Video monitoring and robotic patrol technology are deployed to enhance proactive hazard detection and risk control for high risk events.

GDS also launches the “GDS Vitality Program”, a comprehensive employee wellness initiative encompassing physical health, mental well-being, and daily life support, providing all employees with a safe and healthy working environment.

Responsible Supply Chain

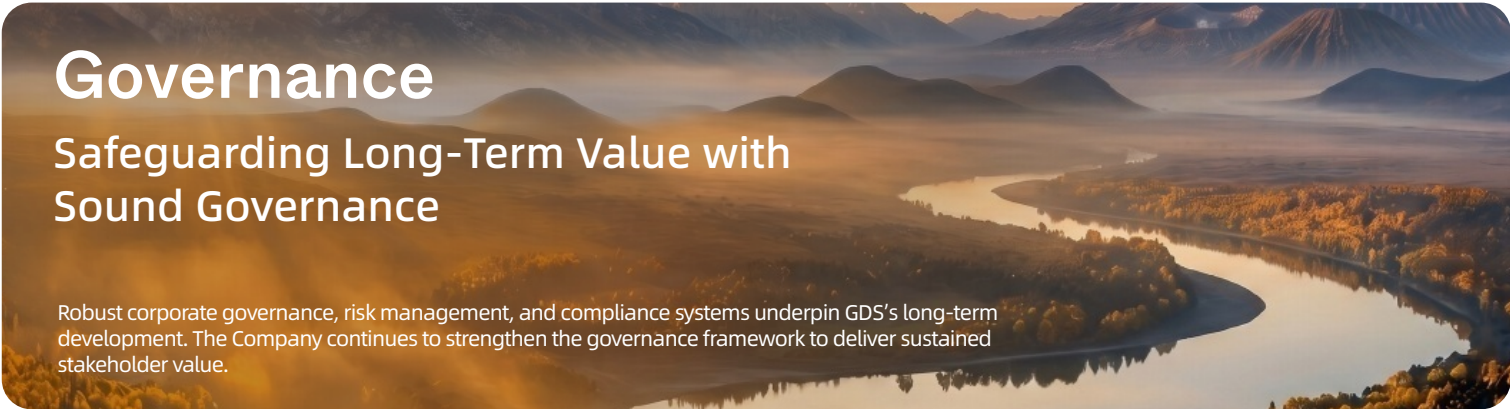
GDS strengthens supplier management by requiring 100% of the new suppliers to sign the Supplier *Sustainability Commitment Letter* and incorporates environment, health and safety (EHS) performance into onboarding assessments. Through the third-party Supply Chain Risk Radar System, GDS conducts risk assessments for 459 suppliers and strengthens sustainability capabilities along with its business partners.

Deepening Community Welfare

GDS carries out public welfare initiatives focused on people, technology, and sustainability. We have participated in the “99 Charity Day” for multiple consecutive years. During the 2025 campaign, the Company and raised nearly RMB 500,000 for medical assistance for children in need. After the Hong Kong’s Tai Po fire, GDS made an emergency donation of HKD 3 million to support rescue and reconstruction.

We also provided technical and financial support to multiple leading universities for frontier research.

GDS partners with Buy42, a social enterprise operating second-hand chain stores that create employment opportunities for people with disabilities. GDS has customized and continuously enhanced a digital donation management system for Buy42, which has processed over 220,000 donated items to date—empowering people with disabilities through technology-driven employment while advancing circular economy practices.



Governance

Safeguarding Long-Term Value with Sound Governance

Robust corporate governance, risk management, and compliance systems underpin GDS’s long-term development. The Company continues to strengthen the governance framework to deliver sustained stakeholder value.

Governance Transparency

GDS has strengthened its governance framework and compliance systems. The Board has established dedicated committees and a comprehensive sustainability governance framework, conducting regular materiality assessments to support transparent decision-making and compliant operations. We have been implementing Enterprise Risk Management (ERM) system based on the Sarbanes-Oxley Act (SOX) to provide reliable risk data to support management decisions.

Innovation Management and Intellectual Property

To fully stimulate and safeguard the momentum for technological innovation, GDS secures intellectual property protection through patent right confirmation. We also establish a business-value-oriented innovation evaluation mechanism. This mechanism prioritizes the conversion rate and coverage breadth of innovation achievements, ensuring that R&D (Research and Development) investment effectively empowers business growth.

In 2025, GDS filed 50 new patents, of which 40% were invention patents, bringing the cumulative total to 319 patent applications.

Data Security and Privacy Protection

GDS has established a data security and privacy protection system that covers the full organization, all business workflows, the end-to-end data lifecycle, and the entire supplier ecosystem, backed by a clear governance framework with explicitly defined accountabilities. Our self-developed Security Operation Center (AISOC) performs precise screening of thousands of alert messages each month, improving IT risk identification efficiency by up to 10 times. GDS strictly safeguards data security and user privacy. In 2025, no material data security or privacy breach incidents occurred.

Data Center Operation Excellence

GDS launched the “Lighthouse Data Center” program to drive operation excellence across five strategic dimensions: Productivity, Supply Chain Resilience, Customer Centricity, Sustainability, and Talent Development. This program accelerates the evolution of our data center operations toward the next generation of performance.



Productivity



Supply Chain
Resilience



Customer
Centricity



Sustainability



Talent



PRODUCTIVITY REINVENTION
Building a “Prediction-Perception-Decision-Action” Closed-Loop System

We are rolling out an integrated intelligent operation platform that uses digital intelligence as the core decision engine, safety protocols as compliance measures, and sensors and controllers as the execution terminals. This creates a seamless closed-loop system that automatically detects incidents, makes autonomous decisions, and executes resolutions in real time.

Automatic Detection

High-precision sensors, CCTV, and robotic patrols form a comprehensive monitoring network that identifies risks and anomalies across the data center. Refer to [Intelligent Risk Perception and Identification System].

Autonomous Decision-Making

Scenario-based intelligent algorithms and digital twin technology enable autonomous judgment and decision-making, achieving minute-level precise adjustments and refined management, and enabling rapid fault localization and response, intelligent early warning for EHS risks, and dynamic energy efficiency monitoring and optimization. Refer to [Digital Intelligence Refined Operations Management].

Efficient Resolution

Digital intelligence application filters non-critical alerts and routes only mission-critical issues for human intervention. Integrated with the emergency response and drill platform, this significantly improves response speed and operational consistency. Refer to [Emergency Drill Alert Platform].



CUSTOMER CENTRICITY
Upgrading to Experience-driven Operations

Operation excellence remains the cornerstone of GDS's data center services. The Company has maximized the efficiency of its human-led operational management, achieving service continuity standards aligned with aviation and financial industry benchmarks.

Through its Lighthouse Data Center initiative, GDS is advancing into the **Excellence 4.0 era**, driving a comprehensive intelligent transformation of operations. The initiative targets **near-zero errors across millions of operational actions**. By embedding digital intelligence technologies end-to-end across customer service workflows, GDS is building a closed-loop intelligent response system—from demand analysis through resource optimization—delivering faster response times and superior service quality.



SUPPLY CHAIN COLLABORATION
Building a More Resilient and Responsive Ecosystem

We have introduced the Smart DC solution, which offers greater adaptability across scenarios, faster deployment, intelligent operations, and improved energy efficiency. To support this, we work with suppliers to develop customized electromechanical systems, renewable energy solutions, and advanced building management systems, backed by digital tools that enhance transparency and coordination. Refer to [Smart DC].

As part of the “Lighthouse Data Center” program, we will continue collaborating with partners to develop intelligent components for new application scenarios and to upgrade construction and operational models for large-scale data centers.



ORGANIZATION & TALENT
Building Multi-Skilled Teams for the AI Era

Increased use of AI will drive both operational and organizational transformation. We are implementing talent development programs to help frontline teams build broader capabilities, enabling them to work effectively with AI tools while maintaining strong operational judgment. Business teams will continue to strengthen core skills and build talent pipelines that support future growth and operational needs.



SUSTAINABLE OPERATIONS
Driving Green Transformation through Digital Management

Leveraging a digital energy and carbon management platform, the Company exercises refined oversight of sustainable data center operations. Through continuous monitoring and management of operational data spanning energy, water, and waste, we improve resource conservation and management standards. Going forward, the platform will integrate a broader set of ESG data – including pollutants, water usage, and health & safety indicators – at higher frequency and granularity. This will enhance risk management capabilities and information transparency, while deepening the clean energy transition and driving deeper emissions reductions. By building a sustainable operation framework, we will propel our data centers toward continuous progress in low-carbon, efficient, safe, and sustainable development.

Performance Highlights

Green	Ecosystem	Governance	Innovation
Renewable energy consumption 3,800 GWh	Suppliers signed the <i>Sustainability Commitment Letter</i> 100%	Compliance training coverage 100%	Total number of patents held 319
Renewable energy ratio ~60%	Percentage of female employees 22%	Data security training coverage 100%	Number of new patents 50
Scope 1 & 2 emissions decreased from the previous reporting year by 9.34%▼	Percentage of females in senior management 34.48%	Multiple cybersecurity threats successfully intercepted Zero Security Incidents	Customer satisfaction score ¹⁵ 9.7
Average PUE ⁹ 1.23	Average training hours per employee 32.7 hours	Signed or renewed anti-bribery and anticorruption commitments with multiple customers 	Customer Net Promoter Score (NPS) ¹⁶ 92%
Best performing PUE ¹⁰ 1.16	Recordable incident rate ¹³ 0.054		
Number of green data centers ¹¹ 45	Total donations to charities RMB 5 million		
Hazardous waste ¹² recovery rate 100%	Employee satisfaction survey scores ¹⁴ 90+		
Shanghai Pujiang Data Center Campus achieved Zero Waste to Landfill (ZWTL) Gold Certification			

⁹Data centers that come into operation after 2020, with utilization rate ≥ 30%, and with new technology and architecture applied.

¹⁰This figure represents the best performing PUE for traditional non-liquid-cooling data centers (such as conventional air-cooling terminal systems). With the large-scale deployment of liquid cooling technology in the future, both the best performing PUE and the average PUE are expected to be further improved.

¹¹Green data centers include: LEED (Leadership in Energy and Environmental Design), ODCC (Open Data Center Committee) Green Data Center, ODCC Low-Carbon/Zero-Carbon Data Center, and Ministry of Industry and Information

Technology Green Data Center.

¹² Hazardous waste consists primarily of spent batteries.

¹³ Total Recordable Incident Rate (TRIR) = Number of Recordable Incidents / Total Work Hours × 200,000.

¹⁴ The employee satisfaction survey score is out of 100.

¹⁵ Customer satisfaction score is out of 10.

¹⁶ Net Promoter Score (NPS) = (Number of Promoters / Total Respondents) × 100% – (Number of Detractors / Total Respondents) × 100%.

Recognition and Achievements

MSCI ESG Rating AAA

MSCI

AAA

Participated in the 2025 S&P Global CSA and was selected for inclusion in the S&P Global Sustainability Yearbook (China Edition) 2025

S&P Global

Scored B rating in the 2025 CDP (under climate change questionnaires)

CDP

GDS's near-term and net-zero science-based targets have been officially validated by the SBTi

SCIENCE
BASED
TARGETS

Obtained Moody's NZA-2 Net Zero Assessment rating

MOODY'S

Ranked on the 2025 FORTUNE CHINA ESG IMPACT LIST

Recognized on Fortune's 2026 Most Admired Chinese Companies list – IT & Services Industry Star List

FORTUNE

Awarded Bloomberg Businessweek Green Finance 2026 Ones to Watch List (ESG 50) and consecutively awarded the “ESG Leading Enterprise” title

Bloomberg Green

ISO 9001 Quality Management System

ISO 20000 Information Technology Service Management System

ISO 27001 Information Security Management System

ISO 27701 Privacy Information Management System

ISO 22301 Business Continuity Management System

ISO 14001 Environmental Management System

ISO 45001 Occupational Health and Safety Management System

ISO 50001 Energy Management System

ISO

Innovation

GDS continues to refine its customer-centric service approach and advance green infrastructure solutions. We strengthen mechanisms to drive technological innovation and enhance our intelligent infrastructure capabilities.

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Service and Customer Experience

High-quality service is fundamental to earning long-term customer trust and achieving sustainable growth. GDS ensures stable, efficient, and reliable service across the customer journey through ongoing refinement to its approach, organizational improvements, and technology enablement.

Customer-Centric Service

GDS has set up a Customer Operation Center that integrates operations across the entire service chain—from demand alignment and solution delivery to operations, maintenance response, and after-sales support. This structure helps ensure that service commitments are consistently met. The Company offers customized services based on different customer requirements. A dedicated project management system, supported by a customer service platform, enables end-to-end coordination and management, improving efficiency and standardization.

Star-Rating Evaluation

Since 2019, GDS has maintained the “Star-Rating Evaluation” monthly self-assessment mechanism. Multi-department teams conduct standardized assessments from a customer perspective across dimensions such as property management, service quality, and disaster preparedness. Results are reported monthly and linked to team and individual performance evaluations to drive timely problem resolution. As of the end of 2025, this mechanism covered 73 multi-tenant data centers across more than ten cities nationwide, playing a key role in maintaining service quality and customer satisfaction.

Customer Feedback Management

GDS has established a comprehensive feedback management system based on its *Complaint Handling Process*, covering the full cycle of “receipt, handling, oversight, and customer confirmation.” Complaints are classified and prioritized, with clear responsibilities and procedures defined for each stage of acceptance, investigation, rectification, and closure. Customer feedback is also incorporated into the development of

products and services. Customers can submit feedback directly to frontline teams through multiple channels, including QR codes, phone calls, emails, and online platforms. In 2025, GDS received 31 customer complaints, all of which have been resolved. In addition, the Customer Service Excellence (CSE) team regularly reviews project managers’ service handling efficiency and quality to drive continuous improvement in service standards and customer experience.

GDS commissions a third-party research institution, Ipsos, to conduct an annual customer satisfaction survey. The survey covers clients from multiple industries and collects feedback through questionnaires, Computer Telephony Integration phone calls and interviews across

dimensions including project management, site operations and maintenance, IT operations and maintenance, and service efficiency, providing clear direction for service quality improvement and customer experience optimization.

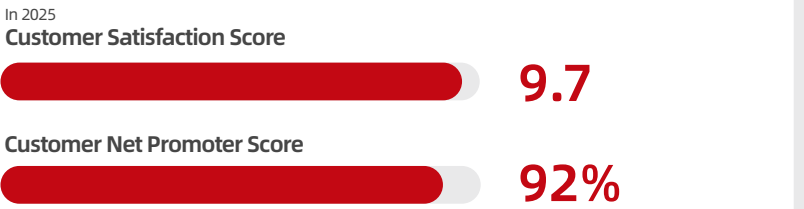
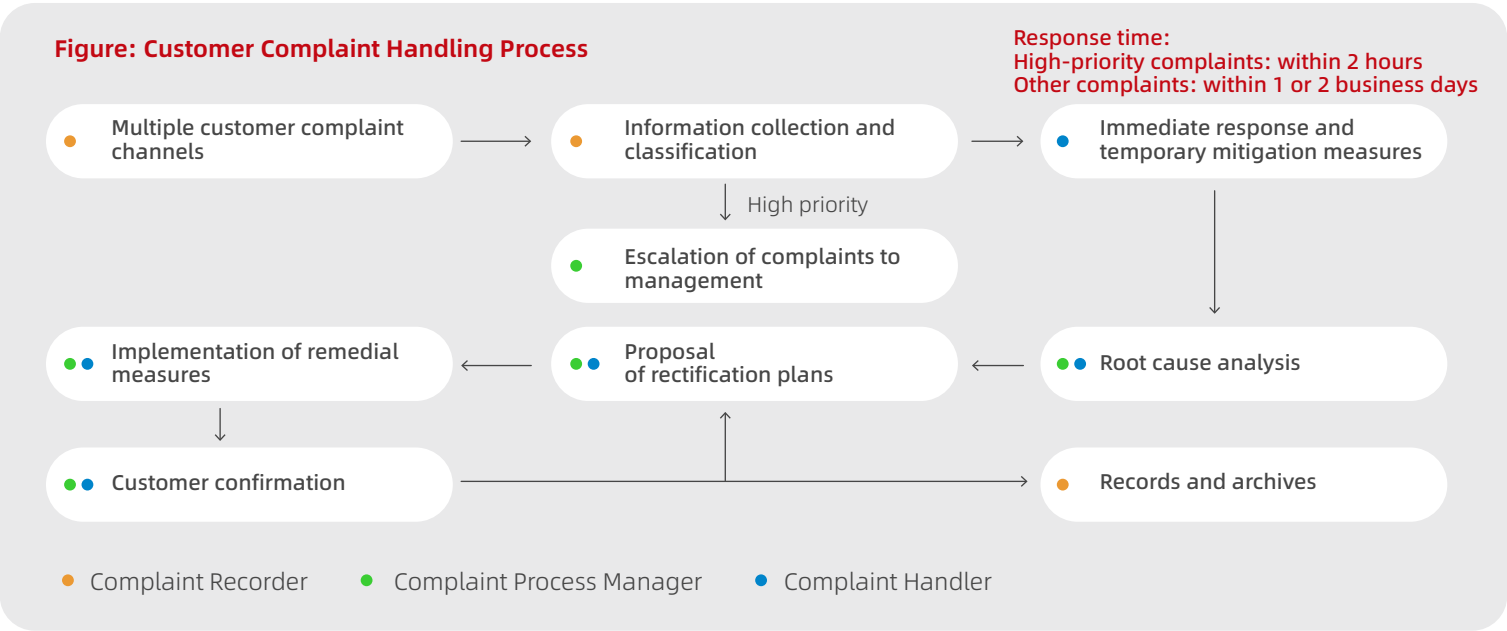


Figure: Customer Complaint Handling Process





Case

3·15 Customer Service Day Activity

In 2025, GDS hosted the *3·15 Customer Service Day* live broadcast. We combined online and offline channels to discuss industry trends and Company development highlights. These efforts help strengthen customer relationships.



▲ 3.15 Event Poster

Customer Service Experience Upgrade

GDS integrates digital intelligence into its customer service processes. We apply digital intelligence to automated email parsing, intelligent ticket classification, and pre-filling. These applications improve processing efficiency and service quality.



Case

Digital-Intelligence-Powered Customer Service System



Scaling Processing

In 2025, the system handled over 280,000 customer service requests in total. Approximately 90% (260,000 requests) were completed automatically by digital intelligence. This allows the customer service team to focus on more complex customer needs.



Rapid Demand Analysis

Digital intelligence analyzes customer requests and pre-fills service tickets. Average single-service processing time is reduced from 2-3 minutes to approximately 10 seconds. Pre-filling accuracy reaches 95%.



Precise Assignment

The system intelligently classifies and assigns tickets, ensuring that high-priority requests are prioritized. This has improved service workflow efficiency and enhanced overall customer experience.

Next-Generation Infrastructure Solutions

GDS aims to improve delivery efficiency, quality, and cost optimization. We have developed a full-lifecycle infrastructure solution centered on the Smart DC product matrix and supported by the Delivery Radar system, covering the entire process from planning and construction to delivery. This provides reliable support for customers' rapid business growth.

Smart DC

To meet the rapid growth in AI computing power demand, GDS continues to enhance its Smart DC product matrix. We offer modular and standardized solutions that address needs such as fast delivery, green and low-carbon operations, and intelligent management.



Agile Delivery Series

This series features modular design, prefabricated production, and standardized assembly, enabling agile deployment, controlled quality, and flexible expansion.



Green and Low Carbon Series

This series integrates liquid cooling, energy storage, and other green technologies to provide zero-carbon-oriented, high-performance computing infrastructure.



Digital Intelligence Series

Based on self-developed intelligent software and hardware, this series builds a full-stack intelligent electromechanical management system for data centers, optimizing total cost of ownership (TCO) across the lifecycle.

Delivery Radar System and Intelligent Risk Warning

The Delivery Radar platform is a full-lifecycle monitoring system for data center projects. It continuously monitors all stages—from planning, design, procurement, and construction to delivery and operations—enabling real-time risk warning, compliance control at key milestones, and dynamic progress visualization. This helps ensure high-quality project delivery. The system will further incorporate digital intelligence technology to enhance end-to-end monitoring capabilities.



Standardization

A unified management interface that reduces operational errors



Intelligent Alerting

Automatically identifies risks and matches them with historical response plans, enhancing resolution efficiency



Accessibility

Enables cross-team information collaboration



Record Retention

Supports audit traceability



Dual-Standard Security Operation Targets

GDS has established a dual-standard security operation indicator system of “aviation-grade + financial-grade” to ensure business continuity and data security for its customers.

Aviation-Grade Safety Operations



As of the end of 2025, the 10-year traceable accident rate per 10,000 operating hours across GDS data centers nationwide was controlled at 0.006, reaching a level comparable to the aviation industry’s safety performance. This ensures stable infrastructure operation and reliable service delivery.

Financial-Grade Safety Operations



GDS builds a full-process risk management system based on *GB/T 42581-2023* to meet stringent financial industry standards. It has obtained the national “Excellence Level” certification for financial data center business continuity.

GDS regards “aviation-grade + financial-grade” security operations as a strategic priority to ensure zero business interruption for customers and safeguard their operational security.

GDS takes a comprehensive approach to managing data center operational risks and leverages digital intelligence technology to improve management effectiveness, providing solid support for customers’ digital transformation and sustainable development. This includes establishing an application risk assessment model (Risk Index) covering six key elements—personnel, equipment, environment, buildings, security and information security, and fire protection—to enable quantitative risk assessment and dynamic control; developing the “Operation & Maintenance EHS” platform to engage all employees in risk governance; and deploying 7×24 on-site teams to respond promptly to customer needs.



Case

Intelligent Risk Perception and Identification System

GDS integrates CCTV, quadruped inspection robots and stationary robots in data center operations to build an intelligent monitoring and inspection system. Combined with intelligent algorithms, the CCTV system captures safety risks in real time—such as smoking violations, failure to wear safety equipment, personnel falls, and unauthorized access to restricted areas (e.g., power distribution rooms)—and automatically generates alerts that are sent to on-site managers. Quadruped robots serve as mobile patrol units to cover monitoring blind spots and perform flexible inspections in complex environments, while robots handle fixed-position tasks such as high-altitude safety monitoring and hazardous material detection.

This system improves the timeliness and accuracy of risk identification. It strengthens GDS’s risk management capabilities, and ensures safer and more efficient operations.



Case

Emergency Drill Alert Platform

To improve the efficiency of emergency handling, GDS has developed an “Emergency Drill Alert Platform” to optimize incident response processes. The platform uses an intelligent troubleshooting module to automatically identify fault levels and types, and triggers an automated dispatch: the system automatically contacts the on-duty engineer closest to the site and assigns the task quickly. Once the engineer arrives on site, the platform activates standardized emergency drill guidance with clear voice prompts and step-by-step instructions to assist in troubleshooting and resolution.

Stimulating Technology Innovation

GDS has established an innovation management framework to promote the integration of R&D with business operations and accelerate the commercialization of industry-academia-research outcomes. These efforts stimulate organizational innovative vitality and create long-term value for customers and society.



Innovation Competitions

GDS organizes internal patent competitions to encourage innovation. A review panel composed of senior executives evaluates submissions based on business value and recognizes outstanding employees with honors such as “Quality Star” and “Contribution Star,” along with stock rewards.

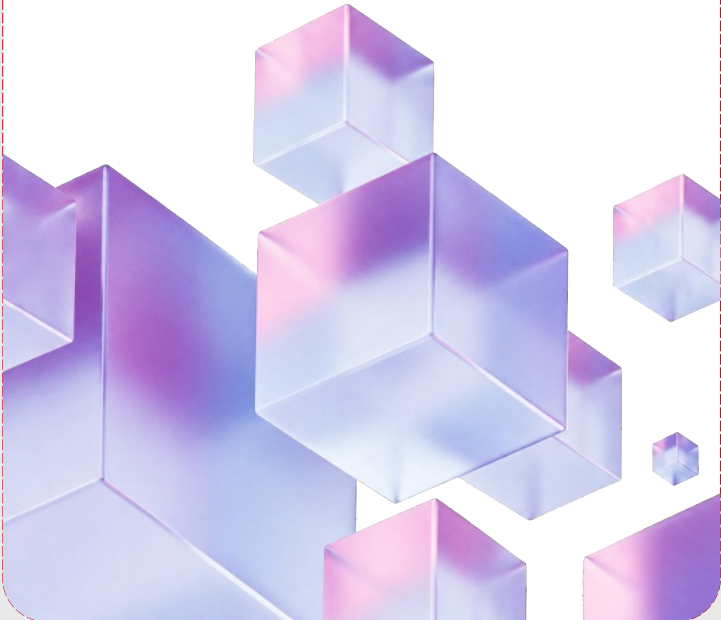
The 2025 patent competition evaluation system conducts assessments from four key aspects: Deployability – the technology has been implemented as a tangible solution; Applicability – relevance demonstrated in the application scenarios; Coverage – data center coverage of the technology solution; and Added Value – alignment with industry trends or national standards.

Several patent technologies originating from business practices have been successfully implemented. For example, intelligent cold source control is deployed to reduce energy consumption. The patent competition has accelerated the commercialization of intellectual property outcomes and fostered a value-driven culture within the organization.

 Case

“Pixel Campaign” to Foster Bottom-Up Innovation Culture

GDS has launched the Pixel Campaign to encourage all employees to proactively identify digital intelligence application opportunities across business processes and promote deeper integration of technology and operations. The IT department conducts technical evaluations and supports the translation from innovative ideas into practice. The campaign has already been piloted in several departments. GDS will continue to expand the Pixel Campaign to build a team equipped with AI thinking capabilities and drive the transformation from digital intelligence technological innovation to tangible business outcomes.



Green

To achieve our carbon neutrality goals, GDS focuses on three strategic pathways—operation excellence, renewable energy transition, and green finance. The Company continues to improve resource utilization efficiency and actively explores circular economy practices, in order to provide customers with high-performance and sustainable computing power and support digital transitions towards a low-carbon future.

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02



Climate Change and Energy Management

GDS sees addressing climate change as a strategic priority. Through “climate resilience + climate mitigation,” the Company continues to refine its transition pathways, cohesively promoting business growth and low-carbon emission reduction.

Climate Governance

GDS maintains climate governance and risk management frameworks in accordance with the *IFRS S2 Climate-related Disclosures* and the *HKEx ESG Reporting Code*. The Company regularly conducts climate scenario stress testing to assess climate resilience. In 2025, further to its 2030 operational carbon neutrality goal, GDS established a value chain net-zero emissions target, validated by SBTi. Details of the target are provided in **[SBTi Near-Term and Net-Zero Targets]**. In the same year, the Company published the *GDS Climate Action and Carbon Neutrality Plan*, disclosing climate-related information across four TCFD-aligned pillars—governance, strategy, risk management, and metrics and targets—and outlining its carbon neutrality pathway and progress. For more details, please refer to **[GDS Climate Action and Carbon Neutrality Plan]**.

In 2025, GDS's operational GHG emissions (Scope 1 and 2) totaled 1,316,725 tCO₂e, a 9.34% decrease compared to the previous reporting year. Value chain GHG emissions (Scope 3) totaled 570,892 tCO₂e, a 44.45% decrease compared to the previous reporting year. We are on track to achieve our decarbonization goals.

Climate Resilience Strengthening Lifecycle Climate Risk Resilience

GDS integrates climate risk prevention into data centers’ full lifecycles and the supply chain management to enhance climate adaptation:

At Site Selection

We conduct upfront environmental and climate risk assessments to control extreme weather impacts;

During Constructions

We adopt climate-resilient technologies, equipment, and materials to improve infrastructure durability;

During Operations

We establish a three-pronged mechanism in risk monitoring and early warning, disaster emergency response, and insurance coverage to ensure stable data center operations;

Across the Supply Chain

We strengthen end-to-end risk resilience through supplier EHS audits and capacity building in climate risk management.

Climate Mitigation Accelerating Decarbonization

Anchored by its 2030 operational carbon neutrality commitment, GDS advances climate mitigation through three key pathways: **Operation Excellence, renewable energy transition, and green finance.**

Operation Excellence

We focus on data centers’ energy consumption and control over the entire process. We leverage digital intelligence technologies to continuously optimize operational energy efficiency, and promote energy-saving technologies such as liquid cooling systems, modular power supply, and waste heat recovery.

Renewable Energy Transition

Committed to 100% renewable energy across operations by 2030. GDS accelerates energy transition through a diversified portfolio: Distributed Photovoltaic (DPv), Direct Green Power Connection (DGPC), Long-term Power Purchase Agreements (PPAs), Direct Power Purchase (DPP), and Renewable Energy Certificates (RECs). These efforts collectively increased renewable energy coverage.

Green Finance

GDS participates in the carbon trading market and explores green finance products to support decarbonization, generating both environmental and economic benefits.

Digitalization

We integrate data of energy consumption and carbon emissions into unified digital platform, which guides energy optimizations, providing data foundation for green power allocation, decarbonization pathways and carbon credit trading. It ensures decarbonization efforts are quantifiable, traceable, and optimizable.

Excellence in Energy Optimization

Aligning with the "8,760-Hour Operations" strategy, we leverage 24/7 real-time monitoring, precision operations, energy-efficiency retrofits, and intelligent control to evaluate and improve PUE. The Company mandates that all new construction and renovation projects procure only Grade 1 energy-efficient equipment¹⁷ upfront.

GDS has scaled the Hybrid Air-Liquid Dual-Coil Cooling System, combining advantages from both air and liquid cooling. The system reuses natural cooling sources from outdoors by adopting an innovative chiller-free design. This application could serve with reduced size and high stability in multiple scenarios. The technology has been deployed in multiple data centers, supporting over 150 MW of data servers. Compared with traditional cooling technologies, it achieves 8-10% increase in energy efficiency, saving approximately 25,000 MWh of electricity per year.

GDS collaborates with technological partners to implement waste heat recovery from data halls. We use recovered heat to warm office spaces, diesel generators and battery rooms. To date, the system has been deployed in 33 data centers, with annual waste heat recovery reaching 300 GWh. Delivering environmental benefits equivalent to saving the annual electricity consumption of approximately 100,000 households.

Average PUE¹⁸

1.23

Target average PUE

1.20 by 2030

¹⁷ Under the China Energy Label (CEL) system, products are labeled in five categories, with Grade 1 indicating the least energy consuming and 5 the most energy consuming. Or equivalent program.

¹⁸ Data centers that come into operation after 2020, with utilization rate ≥ 30%, and with new technology and architecture applied.

Case

The First Data Center Waste Heat Recovery Project in Beijing

The waste heat recovery project at GDS's E-Town Data Center is the first data center project to have enabled stable heat supply in Beijing. It is included in the *2025 Data Center Whitelist of the Beijing Economic and Technological Development Zone*. The project uses a water-source heat pump system that supports cooling and heating bidirectionally. It provides cooling for IT equipment in the data hall, while supplying recycled heat to other companies in the industrial park during the heating season.



Annual heat supply



1,500 GJ

Equivalent to
Saving standard coals of
approximately

50 tons

Reducing carbon dioxide
emissions of approximately

165 tons

¹⁹ Calculated based on the average coal-fired benchmark electricity price across provinces.

Digital-Intelligence-Powered Energy Management

Our proprietary industrial-grade smart terminal forms a closed-loop in "perception-analysis-execution". Integrating edge computing and self-developed control algorithms, the system enables sub-second data acquisition and automated control for cooling infrastructure. The solution is now deployed at over 20 data centers, moving from pilot to nationwide deployment.

Our team continues to iterate on the technology and plans to continuously launch 2.0 in 2026, further improving the accuracy on equipment identification and stability of algorithms. The company plans to deploy the terminal to 45 data centers. After nationwide deployment, the total annual electricity savings are expected to reach 50,000 MWh, equivalent to approximately RMB 18 million¹⁹ in electricity costs.

Due to its impactful innovation, this solution won the First Prize in the 2024 Shanghai Computing Network High-Quality Development Benchmark Application Case Competition, awarded by the Shanghai Computing Network Association.

Total annual electricity
saving expected after
nationwide deployment



50,000 MWh

Renewable Energy Transition

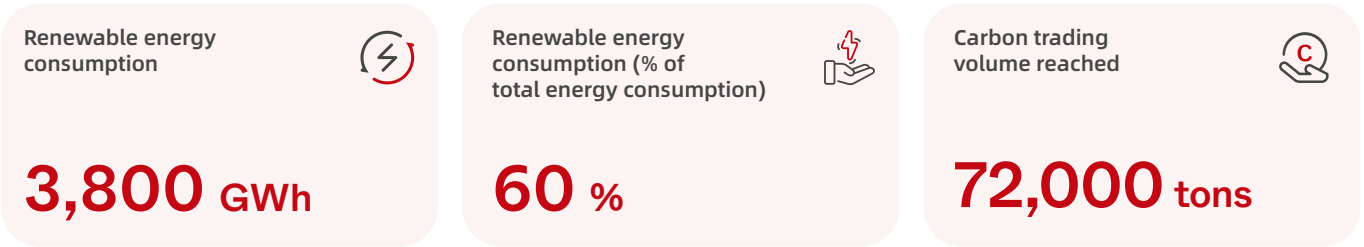
To achieve the target of 100% renewable energy usage across operations by 2030, we continuously increase the renewable electricity consumption ratio through the following five approaches.

Distributed Photovoltaic (DPv)	Generate solar power on-site through rooftop photovoltaic systems.
Direct Green Power Connection (DGPC)	Deploy the “direct transmission + energy storage” model at China’s computing power hubs to provide projects with a stable green electricity supply.
Long-term Power Purchase Agreements (PPAs)	Sign long-term green power PPAs to secure supply channels.
Direct Power Purchase (DPP)	Purchase renewable electricity from power retailers and continues to increase green power purchases.
Renewable Energy Certificates (RECs)	Purchase RECs to meet residual renewable share targets.

Going forward, for all the newly developed data center projects, we plan to invest in direct green power connection projects to supply no less than 40% of their total power demands, with the remainder supplemented by on-site renewable energy stations and other means. The goal is to achieve 100% renewable power supply through clean technology investment.

Carbon Market and Green Finance

GDS leverages a diversified suite of financial instruments such as carbon pledge, carbon repurchase, sustainability-linked Asset-Backed Securities (ABS), and new infrastructure REITs to optimize asset management and establish green financing channels. We also participate in the national carbon trading market and engages in China Certified Emission Reduction (CCER) credit trading, generating revenue of approximately RMB 5 million from the carbon trading.



 Case



On-site Renewable Energy

GDS prioritizes self-generated renewable energy supply. We invest in distributed photovoltaic systems on suitable rooftops across our campuses. In 2025, these systems generated 1,020 MWh of electricity, saving approximately RMB 370,000²⁰ in electricity costs.

Direct Green Power Connection Project

To optimize our energy portfolio, GDS initiated direct green power connection projects at emerging computing power hubs in Inner Mongolia. In collaboration with major power generation groups, the Company channels nearby wind and solar power directly to its data centers via dedicated transmission lines, backed by energy storage systems to ensure renewable energy supply with manageable price.

Inter-Provincial PPA Projects

GDS actively participates in inter-provincial green power trading. In 2025, the Company entered into three-year inter-provincial green power purchase agreements to lock up renewable power supply for data centers in Beijing and Shanghai, with a combined contracted volume of 240 GWh, supporting renewable transitions in both markets.

Water Resource Management

Water is a critical resource for data center operations. GDS strictly complies with national regulations and policies, implements full-process water quality control, manages water-related risks, and improves WUE through recycling technologies. The Company deploys cooling technologies tailored to local conditions and builds a resilient water resource management system.

Water Resource Recycling

GDS conducts water sample testing and analysis using its water quality laboratory. The results serve as the basis for tailored water treatment, helping to improve water efficiency. We advance water resource recycling and promote Reverse Osmosis (RO) technology and electronic sterilization to improve WUE. In water-scarce regions, GDS scales reclaimed water reuse. We use treated reclaimed water as supplement for data center cooling systems. In some data centers with high precipitation, GDS builds rainwater collection systems. Treated rainwater is used for green irrigation and road-washing to reduce municipal water consumption.

Water Resource Risk Response

To address water scarcity risks, GDS adopts forward-looking strategies to reduce dependence on water resources from the source. In regions with high water stress, the Company prioritizes dry cooling or zero-water cooling technologies to minimize water consumption, thereby significantly enhancing adaptability to water-related risks.

During the reporting period
WUE

1.69



Case

Dry Cooling Solution and Reverse Osmosis (RO) Wastewater Recycling System

Tailoring measures to local water resource conditions, the Company deploys dry coolers with waterless or low-water cooling solutions in select new projects to reduce water dependency. Meanwhile, reclaimed water recycling systems have been rolled out at scale across data centers in East and North China. Leveraging RO wastewater recycling systems, cooling system discharge water is filtered and reused, enabling approximately 70% of blowdown water to be recovered grey water.



Circular Economy

GDS strictly complies with national and local laws and regulations. We have established a waste management system covering construction, operations, and office areas across our data centers, promoting waste classification, collection, and compliant disposal in line with circular economy principles.



▲ Zero Waste to Landfill Management Performance Certification

Waste Management

GDS implements end-to-end waste management to ensure that all waste is handled safely and responsibly.

Construction Waste Management



Standardized transportation and management procedures govern construction waste including excavated soil, discarded building materials, and packaging materials to minimize the impact of construction activities on the surrounding environment.

Data Center Operation Waste Management



GDS strictly controls the disposal of hazardous waste, including used lead-acid batteries, waste oil, and chemical reagents. In accordance with relevant laws and regulations, the Company has established a *Hazardous Waste Management Program* covering generation, labeling, storage, and transfer of hazardous waste. At the end-of-life stage, waste is handed over to qualified third parties for compliant disposal. The Company achieves 100% recycling of used lead-acid batteries. General industrial solid waste is disposed of on a regular basis, ensuring that all waste leaving the site complies with environmental regulations throughout, achieving zero waste to landfill goals. The Pujiang Data Center Campus has obtained “zero waste to landfill” certification.

Office Waste Management



GDS promotes waste sorting across all office locations. Through clear signage and coordination with property management, dry waste, recyclables, kitchen waste, and hazardous waste are collected in accordance with standardized procedures.

The Company encourages reduction of single-use consumables at the source by promoting paperless offices, double-sided printing, recyclable office supplies, thereby reducing the generation of daily waste.





Case

Circular Economy Practices

HVO Biodiesel Pilot

GDS launches China’s first kitchen waste oil recycling pilot project in the North China data centers. We establish a complete circular economy pathway in **“waste oil collection – biodiesel conversion – low-carbon energy supply”**.

The pilot focuses on alternative fuel needs for data centers’ backup power systems. By collecting kitchen waste oil from data centers and the surrounding areas and processing it into HVO biodiesel, conventional diesel in backup generators is replaced without equipment modifications. Lifecycle analysis indicates that biodiesel produced from waste oil can reduce lifecycle greenhouse gas emissions by up to 90% compared with conventional diesel, while eliminating harmful components such as aromatic hydrocarbons found in traditional diesel. The fuel delivers comparable power stability and storage safety to conventional diesel.

As one of the first HVO pilot projects in the Internet Data Center (IDC) industry in China, the project demonstrates the recyclability of waste oils. It converts urban waste with potential contamination risks to food, into green energy for data centers. It addresses waste disposal challenges while creating a new pathway to reduce Scope 1 GHG emissions, turning an environmental burden to green assets.

The solution’s technical reliability and carbon reduction performance have been fully validated. GDS plans to scale the model nationwide and explore additional circular economy solutions aligned with our business scenarios.

Battery End-of-life Recycling

For uninterruptible power supply (UPS) systems and daily operations, GDS adopts a complete recycling system for used batteries. Retired batteries are classified, collected, and safely stored on-site before being handed over to qualified third-party partners for metal material recovery, with the recycled materials directly reused in production.



In 2025
Recycling of waste batteries



100%

Environmental Impact of Buildings

GDS incorporates green concepts starting from the design and construction stages. We are committed to obtaining green building certification for new data centers. We promote harmony between data centers and the surrounding environment while reducing the full lifecycle environmental impacts.



Green Construction Management

All new projects are benchmarked against mainstream domestic and international green building standards. Low-carbon and eco-friendly building concepts are integrated into the design and construction process. Systematic pollution prevention and control measures are implemented during construction to ensure compliant classification and disposal of construction waste.

Green Building Certification

GDS actively promotes the integration of green and healthy concepts throughout the lifecycle of its data centers. We apply for “green building” certification for all eligible office premises. While ensuring energy-saving and environmentally-friendly building performance, the Company focuses on optimizing air quality, natural lighting, acoustic environment, and human-centric design in data center operation areas. Extending sustainability requirements to daily operations, we benefit from both lower carbon emissions and improved user experience.

Ecological Protection

GDS assesses the ecological environment and cultural features of surrounding areas for all new projects. We work with qualified third-party institutions to conduct environmental impact assessments and social risk assessments. This ensures that projects’ site selection and construction plans comply with regional ecological protection plans and regulatory requirements.

To date
Data centers obtained
green certifications

45

To date
Data centers obtained green
building certifications²⁰

90%

Green data center goals:
The coverage of green building certification for
newly commissioned self-built data centers
from 2020 onwards



100%

²⁰ Self-built data centers commissioned since 2020 have obtained or are applying for green building certifications

GDS Changshu Zero Carbon Data Center Campus

The Changshu Data Center campus is GDS's another benchmark zero-carbon data center, apart from Pujiang Zero-Carbon Campus. Being "climate-friendly + resource-efficient," the campus integrates intelligent management, renewable energy management, energy efficiency retrofits, and resource recycling to build a green operation model and set a benchmark for the industry.



Case

Building a Climate-Friendly Operational Model

Changshu Data Center campus implements a decarbonization model that combines "Operation Excellence" with "Renewable Energy Transition." It has deployed multiple climate-friendly projects to create an end-to-end decarbonization pathway spanning from energy supply to energy control.

Digital Intelligence-Driven Precision Energy Efficiency Control

The Smart Terminal for cooling system optimization was first deployed at the Changshu Data Center. Using intelligent algorithms to build a dynamic cooling system optimization model that replaces traditional manual static control, and while ensuring reliable equipment operations, it improves the campus' PUE and achieves annual electricity savings of 800-900 MWh.

Energy Efficiency Programs

Considering Changshu's regional climate characteristics, the campus has deployed a dual-coil air conditioning system to fully utilize natural cooling resources throughout the year. In addition, leveraging experience from Pujiang Campus, Changshu Campus plans to implement a waste heat recovery system to reuse waste heat from data hall operations in living areas, creating a closed-loop energy model in "production - consumption - recovery".

On-site Photovoltaic System

A 375 kW distributed photovoltaic project has been installed on the rooftop and is fully connected to the grid. It generates approximately 580 MWh of electricity annually, replacing conventional energy sources with green power and continuously optimizing the campus' energy

Annual carbon emission reduction²¹

308 tCO₂e



Equivalent to

The annual carbon absorption of

12,000 mature trees²²

Or reducing the carbon emissions from a passenger vehicle driving approximately

1.5 million km²³

"Efficiency+Circularity" Resource Management Pilot

The campus focuses on efficient resource management and adopts both technological improvements and circular reuse measures to continuously reduce water consumption intensity and promote waste recycling.

Reducing Water Consumption Baseline

The Changshu Campus was the first to apply electronic sterilization and membrane electrochemical²⁴ water treatment technology, effectively reducing wastewater generation. The campus is expected to save 16.19 million tons of water annually, significantly improving WUE.

Recycling to Expand Water Supply Sources

The campus plans to construct a rainwater recovery system of 72.96 cubic meters to collect, treat, and reuse natural rainwater. It is expected to save approximately 5,000 tons of water annually, effectively reducing reliance on municipal water supply.

Waste Recycling Model

Following the company-level waste management principles, general industrial solid waste is regularly and properly disposed of to ensure full compliance and achieve the zero-landfill target. A system addressing proper classification, safe storage, and professional recycling was established for used batteries, enabling **100% recycling and reuse** of used lead-acid batteries in 2025.

²¹ CO₂ emission factor for electricity is 0.5306kgCO₂/kWh.

²² Assumes 25 kg CO₂ absorbed per mature tree per year.

²³ Based on average emissions of ~200 g CO₂/km for Chinese passenger vehicles.

²⁴ Similar to Reverse Osmosis technology.

Through coordinated measures across energy, water resources, and waste, the Changshu Campus is expected to save over 14.7 GWh of electricity and 16.19 million tons of water annually. This project establishes a standardized, low-carbon and resource-efficient operation model, setting a benchmark for data center green transformations.

Ecosystem

GDS integrates sustainability principles across its business ecosystem. Internally, we prioritize talent development and attraction, strengthen health, safety, and rights protection systems, and foster organizational vitality. Externally, we embed sustainability criteria into supply chain management, participate in industry standard developments, and leverage technology to support public welfare, building a shared ecosystem with communities.

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Human Capital Development



The Company continues to strengthen its talent development and attraction mechanisms through the Efficiency-Driven and Capability-Driven Talent Strategy. We enhance Human Resources (HR) allocation efficiency by optimizing workforce effectiveness management, digital tools, and organizational mechanisms. Meanwhile, we build a talent pipeline centered on key positions, core competencies, and high-potential talent, supporting employees in achieving continuous growth through business practice.

Efficiency-Driven and Capability-Driven Talent Strategy

Efficiency-Driven Talent Strategy

Efficiency-Driven Talent Strategy focuses on improving workforce productivity. We establish a performance indicator system, use digital tools to dynamically track and manage HR operation data, and support data-driven HR decision-making. The company encourages employees to embrace an entrepreneurial spirit and a customer-oriented and result-driven mindset.

Case

Digital Intelligence Driving Human Resource Upgrade

The Company is implementing digital HR systems to move all personnel processes online and centralize labor cost data management, boosting operational efficiency and management standardization. We also leverage digital intelligence and data analytics across talent identification, learnings and development, employee services and organizational management to improve the accuracy and efficiency of talent development and allocation, with data security, privacy protection and fairness embedded throughout all applications.

Capability-Driven Talent Strategy

Capability-Driven Talent Strategy focuses on building a sustainable core talent pipeline. Through a process of “core position identification – competency model development – capability enhancement,” GDS identifies and prepares successors and high-potential talent for key technical positions. It defines clear competency standards for roles across dimensions such as business analysis, strategic planning, and operation management, with an emphasis on strengthening project management, cross-functional collaboration, and problem-solving capabilities, and designs customized development plans based on assessment results to strengthen the talent pipeline.

Case

AI-era Talent Development Planning

As AI and digital transformation reshape business models, the Company has incorporated AI-related competency into its talent development strategy. We systematically map future needs for key roles, core technical skills and versatile talents, and keep optimizing our talent reserve and training framework in line with business priorities, technology trends and role requirements.

Talent Development and Training

The Company has built a tiered development system that covers the entire employee lifecycle, creating a talent pipeline from frontline staff to management levels. It introduces high-quality internal and external courses as needed and designs specialized development programs based on job grade and business function. Training plans are formulated in alignment with strategic priorities and departmental needs. The company has established a transition program for retiring employees. The retired professionals could be re-hired as technical advisor, giving them a chance to navigate their career transition while preserving hands-on experience in key technologies within the organization.

GDS has independently developed a training and assessment platform that includes general compliance and management knowledge as well as specialized training content for each data center front-line staff. This has significantly improved training coverage and assessment efficiency.

In 2025

Training²⁵ coverage reached

100%

Average training hours per employee at

32.7 hours

²⁵ The training programs include compliance trainings, job-specific skills trainings for relevant personnel, and safety trainings.

Talent Pipeline Development and Other Training Programs

Training Category	Program	Program Overview	Target Participants	Training Outcomes
Talent Pipeline Development System	Blue Lion Program	Develop a young and globally oriented talent pipeline for management positions through potential assessment, position fitness evaluation and mentorship programs	Young talents with potential for strategic management	Over 70% Management trainee retention rate
	Golden Lion Program / High-Potential Talent Development Program	Foster strategic mindsets and team management skills for mid-level managers with high potential	Prospective mid-level managers	
	Golden Eagle Program	Enhance project management, professional and technical skills for fresh graduates with master's degrees or above	Talent pipeline from campus recruitments	Over 90% of management trainees have entered management or professional talent pipelines
	Rising Sun Program	Train new hires with associate college degrees as frontline management and key technicians	Frontline new hires (for operations and technical roles)	
Leadership Trainings	Collaboration Training	Improve coordination and cross-departmental collaboration skills, with a focus on digitalization	High-potential talent with strong management capabilities	Mid-level management team participation: over 90%
	Management Training Courses	Accelerate growth for mid-level managers through project management training courses		
General Training	New Employee Onboarding Training	Support improved role adaptation through onboarding trainings including compliance, data security, anti-corruption, and EHS provided to new employees	All new employees (including interns and management trainees)	100 % Onboarding compliance assessment pass rate
	Compliance Training	Provide EHS, compliance management, and information security throughout the year to strengthen compliance awareness	All employees	100 % 2025 full-staff compliance training coverage
	GDS Lecture	Include training sessions on industry trends, strategic thinking, core technologies, AI applications, and ESG practices, regularly delivered by internal and external experts		5 sessions held in 2025, covering 1000+ participants. Topics included talent profiling, organizational communication and collaboration, AI-efficient office work, GDS-5S sustainable development



Compensation and Benefits

GDS has established comprehensive compensation, benefits, and incentive system to effectively motivate employees and reward their contributions. Our compensation system is market-competitive, consisting of base salary and performance bonuses. The Company fully complies with local regulations by making complete social insurance contributions. We provide various special allowances, paid annual leave, and a wide range of employee support programs. GDS provides non-pay benefits to all employees and has also built an employee wellness platform that provides diverse benefits, covering all employees and enhancing their sense of fulfillment and belonging.

Project-Based Incentive Mechanism



The Company has established a project-based incentive mechanism aligned with strategic goals, project outcomes, and value creation. Timely recognition and rewards are given based on project results and actual contributions, motivating employees to actively engage in tackling project challenges and driving continuous innovation.

Equity Incentive Mechanism



The Company implements an equity incentive mechanism that allocates equity based on individual performance and position value, aligning employees’ personal value with the Company’s long-term development. In 2025, over 50% of eligible employees participated in the equity incentive program.

Employee Support Programs

All employees

- Annual physical examination
- Holiday benefits
- High temperature and heatstroke prevention subsidy
- Working-from-home arrangements
- Special accident insurance
- Additional commercial insurance for employees and their children
- Flexible working hour
- Compensatory time off

Employee Wellness Platform

- Festival welfare
- Birthday care
- Movie rewards
- Activity incentives

Female employees

- Paid parental leave for the primary caregiver²⁶
- Maternity leave
- Feeding leave

Male employees

- Paid parental leave for the non-primary caregiver²⁶

Employees requiring assistance

- Support for employees in need

- GDS Vitality Program (workplace stress management and sport & health initiatives)

²⁶ In addition to female employees enjoying maternity leave and feeding leave as stipulated by local regulations, and male employees enjoying paternity leave, all employees are entitled to 5 days of parental leave per year until their child reaches the age of 3.

Performance Management

GDS has established a comprehensive performance management mechanism and clear career advancement pathways. Performance management follows an annual evaluation cycle, incorporating multi-dimensional assessments of both individuals and teams, along with 360-degree feedback²⁷. It is supported by performance discussions and appeal channels to ensure a transparent process and fair outcomes. Promotion reviews are conducted twice a year, taking into account work performance, capability growth, job contributions, and internal competency standards, ensuring high-potential talents have equal development opportunities.

²⁷ The 360-degree feedback method is a performance evaluation approach based on multi-source information collection.

Project-Based Organizational Culture

The Company drives collaborative innovation and talent growth through project-based organization. Aligned with our strategic goals and organizational priorities, we have developed a three-year plan to strengthen project management mechanisms, enhance cross-functional collaboration, and boost organizational responsiveness. Through projects, we reinforce a goal-driven and accountable mindset, encouraging teams to collaborate and solve problems around key business objectives. This gradually shapes a more efficient and collaborative project-based culture. Project practices also serve as authentic business scenarios and evaluation grounds for identifying and developing key talent.

Employee Satisfaction

GDS conducts an annual employee engagement and satisfaction survey using an anonymous questionnaire based on the Gallup Q12 framework²⁸, focusing on multiple dimensions related to employee experience. The 2025 survey showed that over 90% of employees gave the highest rating to the relevant statements. Based on the survey results, company-level and department-level analysis reports are prepared. Satisfaction feedback workshops are held in each region, to encourage employees to provide feedback and drive further improvements.

Dimensions Covered in the Employee Satisfaction Survey

Work Satisfaction	Covers employees' satisfaction with compensation and benefits, job content, and recognition received
Engagement at Work	Assesses employees' understanding of the company's strategy and the connection between their individual work and organizational goals
Workplace Well-being	Mainly measure aspects such as supervisor support, sense of belonging, and long-term retention intention

Based on the survey results, GDS takes improvement measures. For issues raised by employees, the Company has worked with relevant departments to implement improvements.

GDS Vitality Program

We prioritize employees' physical and mental health and work experience, having implemented the GDS Vitality wellness program covering physical health, mental well-being and lifestyle support. Moving beyond one-off welfare benefits, the program is built as a long-term, systematic well-being framework to foster a positive, collaborative work culture, boost employee satisfaction and organizational cohesion, and underpin the Company's sustainable growth.



Physical Well-being

In terms of physical well-being, we provide all employees with annual health check-ups, supplementary medical insurance, health awareness lectures, traditional Chinese medicine wellness programs, chronic disease management, and other health-related care. For employees in specific roles, we organize occupational health examinations and implement seasonal protective measures such as heatstroke prevention subsidies, helping employees enhance their health awareness and self-management capabilities.



Mental Well-being

In terms of mental well-being, we provide an Employee Assistance Program (EAP) that includes a 24-hour psychological counseling hotline, individual counseling sessions, mental health lectures, themed workshops, and psychological support training for managers, enabling employees to effectively manage stress and access professional mental health support timely.



Lifestyle Well-being

In terms of lifestyle well-being, we organize various sports events and support employees in spontaneously forming diverse clubs such as running groups, basketball teams, and other fitness groups, fostering a vibrant organizational atmosphere.

²⁸ The Gallup Q12 framework is a scientific tool that assesses and manages employee engagement and workplace environment through 12 core questions.

Employee Health and Safety

GDS is deeply committed to employee health and safety. We continuously improve our occupational health and safety management system and leverage digital intelligence technology to strengthen safety controls, creating a safe and healthy working environment.

EHS Management System

GDS has established an occupational health and safety management system based on the ISO 45001 standard and steadily improves its performance. The system covers office areas of 61 data centers, data center operation sites, all employees, and contractors. The Company formulates an annual occupational health and safety plan with clear objectives, resource allocation, and action plans. Management regularly oversees the operation of the system and evaluates its performance. GDS has established a standardized incident reporting and investigation system to promptly trace and analyze work-related injuries, occupational health issues, and near-miss events, and to implement corrective and preventive measures, forming a closed-loop management process. Guided by a prevention-first philosophy, GDS formulates a dedicated occupational health and safety plan each year, clearly defining management objectives, resource allocation, and implementation details. Management regularly reviews the effectiveness of the system. The Company conducts routine risk inspections in workplaces to dynamically manage safety hazards. EHS performance is incorporated into supplier and contractor evaluations. Employee communication channels have been established to encourage participation in safety management, feedback on issues, and suggestions for improvement.

In 2025

Company’s overall Total Recordable Incident Rate (TRIR)

0.054

The employee absentee rate²⁹

0.3%

²⁹ Covering both full-time employees and contract workers.

Occupational Safety Practices

GDS implements standardized safety management measures, strictly enforces job safety briefings, equips frontline staff with complete personal protective equipment, standardizes procedures for high-risk operations such as working at heights, and regularly organizes safety skills training. All office and data hall areas are equipped with Automated External Defibrillators (AEDs) and staffed with certified first aid personnel.

In 2025, the company improved its EHS management capabilities through system optimization and digital tool applications. In 2025, the company improved its EHS management capabilities through system optimization and digital tool applications. Throughout the year, GDS introduced or updated 39 EHS policies. Tiered safety training was conducted across business centers nationwide, with a total of 5,319 training sessions amounting to 25,517.9 hours, achieving a 93% closed-loop rate for hazard rectification. The department publishes safety tips via the “GDS Operations EHS” WeChat official account and uses digital tools such as “Snap & Report” to enable real-time risk reporting. The Company has piloted intelligent video monitoring and robotic inspection technologies to strengthen real-time monitoring and proactive early warning for high-risk areas and behaviors, shifting from passive response to active prevention. For details, please refer to [Intelligent Risk Perception and Identification System].



Case

AED First Aid Personnel Training

To enhance workforce emergency response capabilities, GDS organized multiple first aid training sessions for employees, conducted by external professionals.

As of the report release date, 171 personnel have successfully completed AED first aid training and obtained certification.



▲ AED Training

Employee Engagement

GDS safeguards employees’ legitimate rights and interests through comprehensive rights management systems, accessible grievance mechanisms, employee satisfaction surveys, and equal employment practices, thereby optimizing the workplace environment and enhancing employee well-being and organizational effectiveness.



Policy and System Upgrades

GDS upholds the principles of the UN *Universal Declaration of Human Rights* and relevant international human rights conventions. We strictly comply with local laws and industry standards, prohibiting child labor, forced labor and human trafficking. We implement equal pay for equal work, set maximum working hours, and protect employees' rights to freedom of association and collective bargaining.

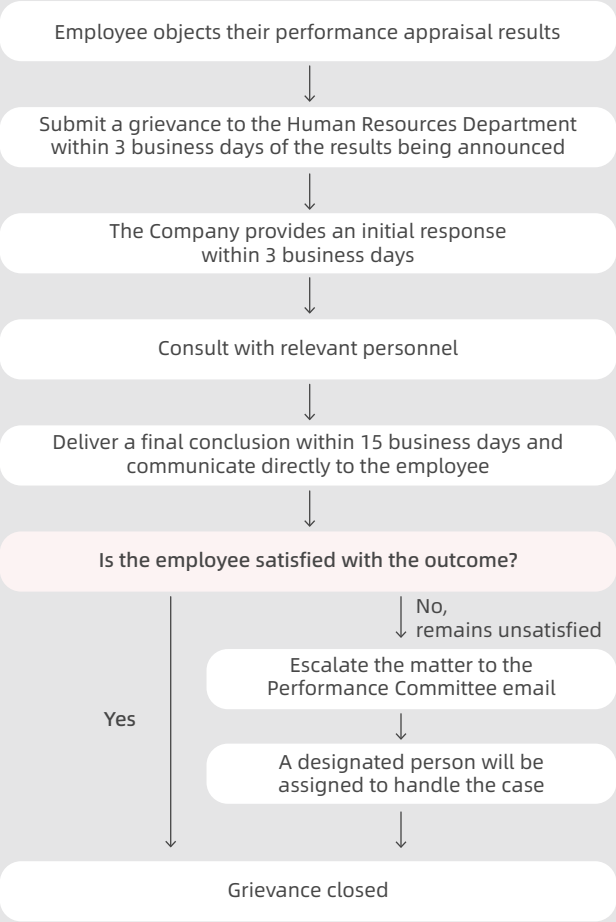
In 2025, the Company revised its *ESG Policy* and *Employee Handbook* to further emphasize human rights and labor rights protection, as well as anti-discrimination and anti-harassment provisions, and incorporates into its management systems. Underpinned by *GDS Code of Business Conduct*, GDS has established a comprehensive employee rights management framework. The policies explicitly prohibit discrimination based on gender, ethnicity, physical condition, or other factors, and maintain a zero-tolerance stance toward all forms of harassment. Any confirmed violations are subject to disciplinary action based on severity, with serious cases resulting in termination of employment. Every quarter, the Company reinforces awareness of rights protection, anti-discrimination, and anti-harassment through new employee training. In 2025, no discrimination or harassment-related complaints or penalties were recorded, and human rights due diligence work is being planned in an orderly manner.

Employee Communication and Grievance Mechanism

Employees can provide feedback or file grievances regarding labor relations, workplace environment, or management practices. All grievances are handled confidentially. The Company has established dedicated employee grievance channels to regularly collect feedback and address employee concerns. Employees can submit feedback via dedicated email or through the HR hotline. Upon receiving a complaint, the Company will respond within 5 business days.

The company values two-way communication, provides employees with well-established third-party communication channels, and has formulated robust procedures for different types of employee appeals, including those related to performance appraisal, discrimination, harassment, and disciplinary actions. For discrimination and harassment-related reports, a confidentiality mechanism has been established for named reports to protect whistleblowers.

Employee Grievance Procedure Flowchart



Diversity and Equal Opportunity

GDS integrates the principles of diversity, inclusion, and equal opportunity into its recruitment, career development, and compensation management processes. Through both policies and practices, the Company ensures fair development opportunities for all employee groups.



Promoting Gender Equality

GDS attaches great importance to protecting the rights of female employees by providing maternity leave, breastfeeding leave, and special holiday care benefits. The Company sets female employee ratio targets in key departments to ensure adequate female representation in critical functions and leadership positions. It also promotes and recognizes the outstanding achievements of female employees through various channels, helping women speak up and thrive in the workplace.

In 2025

Female employees accounted of the total workforce

23 %

The proportion of female employees in middle management reached

28 %

The proportion of female employees in senior management reached

34 %

Growth and Leadership of Female Talent in Core Businesses

The Company focuses not only on the proportion of female employees, but more importantly on the development quality of diverse talent in core business and key positions. We equally support all employees to take on important responsibilities across R&D, operations, engineering construction, supply chain management and other fields. A number of female executives currently lead departments including data center operation and management, design and R&D, construction project management and supply chain management, leveraging their professional judgment, organizational coordination and team management capabilities in complex business scenarios.

Many of these female leaders are long-term talents from the company internally, promoted step by step from entry-level or mid-level positions. They accumulated hands-on experience through business practice, project delivery and management responsibilities before advancing to key management roles. The Company upholds competency-based promotion and equal opportunity principles, ensuring sustainable development pathways for diverse talent in core business areas.

The proportion of female managers in revenue-generating functions³⁰ stood at

42 %

Ensuring Equal Employment Opportunities for People with Disabilities

GDS strictly complies with national laws and regulations to provide equal employment opportunities for people with disabilities. Recruitment and employment practices follow non-discrimination principles, and suitable positions are matched for employees with disabilities. The Company continues to optimize accessible facilities and work arrangements to ensure that all employees can perform and grow in an inclusive environment. As of the end of 2025, GDS employed a total of 20 employees with disabilities.

³⁰ Refer to line management roles in departments such as sales, or that contribute directly to the output of products or services.

Value Chain Ecosystem Development

GDS integrates sustainability principles throughout its supplier management process – from admission screening and ongoing monitoring to capability building – to drive the transition of its supply chain toward greater responsibility and lower carbon emissions. The Company also actively participates in industry standard development to lead collaborative progress across the value chain.

Sustainable Supply Chain Management

GDS incorporates sustainability into its supplier management processes. We have established the *Supplier Code of Conduct* and require 100% of suppliers to sign the *Sustainability Commitment Letter*, clearly defining their responsibilities in environmental, social, and governance matters. Environmental, health, and safety (EHS) performance is used as a core criterion in supplier admission reviews. Through these efforts, GDS works with partners to build a green and safe supply chain system.

Supply Chain Risk Management

GDS has strengthened its risk identification and improvement mechanisms for supply chain partners. Through on-site inspections and the third-party “Supply Chain Risk Radar” system, the Company dynamically identifies and provides early warnings on potential compliance and penalty risks in supplier operations. In 2025, GDS completed performance evaluations and risk screening for 459 suppliers. All suppliers are monitored through the risk radar system, enabling proactive identification and management of supply chain risks, while helping partners improve compliance and sustainability capabilities and enhancing overall supply chain transparency.

Participation in Industry Standard Development

GDS participates in the development of several key standards, including the national standard *GB/T 44989-2024 Evaluation of Green Data Centers*, the national standard *GB/T 34982-2017 Cloud computing data center basic requirement*, the Beijing local standard *DB11/T 1764.11-2023 Water Quota Part 11: Data Centers*, the *Technical Requirements for AI-Based Energy Saving in Data Centers*, and *Internet data center(IDC) technical and classification requirements*. These efforts promote the standardized and green development of the data center industry.

Case

Excellence Day Industry Exchange Event

On October 30, 2025, GDS hosted the GDS Excellence Day event in Shanghai. Centered on the theme “DATA CENTER FOR Ai, Ai FOR DATA CENTER,” the event brought together representatives spanning data center, finance, semiconductor, large-model, and power industries to discuss cutting-edge topics such as ESG-driven innovation, computing power infrastructure construction and operations, and the development of domestic computing power ecosystems.

The event aimed to promote cross-industry technical and business exchanges, showcase GDS’s strategic positioning in relevant fields, and advance the development of the industry ecosystem.



▲ GDS Excellence Day

Community Engagement

Guided by its core values of integrity, humility, diligence, empathy, and honesty, GDS carries out public welfare activities focused on promoting science and education to serve national development, support for orphans and people with disabilities, and technology for good, spreading warmth and positive impact in communities.



99 Charity Day

For the fourth consecutive year, GDS partnered with the Chunhui Bo'ai Foundation to participate in Tencent's "99 Charity Day" campaign. The initiative combines employee donations, public fundraising, and corporate matching donations to provide support. During the 2025 campaign, 10,011 donations were made, raising nearly RMB 500,000³¹ for medical assistance for orphans and abandoned children. The campaign was promoted through both online and offline channels, with internal mobilization within the Company and large-screen promotions in commercial areas in Beijing and Shanghai, calling on society to pay attention to the cause of supporting orphans and children with disabilities.



▲ 9.9 Charity Event Poster

Disaster Relief for Hong Kong Fire

On November 26, 2025, a Level 5 fire broke out at Hong Fuk Yuen in Tai Po, Hong Kong. GDS responded promptly by donating HKD 3 million to support on-site emergency rescue, temporary resettlement of affected residents, and subsequent community reconstruction, fulfilling its social responsibility in responding to public emergencies.

³¹ Including user donations of RMB 100,247.29 and corporate matching donations of RMB 384,879.62.



Case

Technology Empowering Philanthropy –
In Partnership with Buy42

Buy42 is China’s first charity store chain brand. Guided by the philosophy of “Each Has Value,” it promotes the reuse of idle items while providing equal and dignified employment and development opportunities for people with disabilities. Its founder adheres to a long-term approach, aiming to build sustainable charity stores that serve thousands of regular visitors rather than short-lived viral stores.

GDS leverages technology to support charity by developing a customized one-stop digital donation management system for Buy42. The system integrates donation receiving, inventory management, online sales, and logistics tracking. Through a WeChat mini-program and backend management system, it enables fully online and standardized processing of donated items, eliminating reliance on paper records and manual sorting. The system supports collaborative operations among donors, store staff, volunteers, and product administrators, significantly shortening the donation processing cycle.

GDS continues to maintain and upgrade the system. We are currently developing a carbon reduction intelligent accounting module that calculates the environmental contribution of idle item recycling based on industry standards. This visually demonstrates the carbon reduction benefits of individual charitable actions, creating a benchmark that integrates philanthropy, circular economy, and low-carbon reduction. In 2025, Buy42 sold a total of 780,000+ recycled donated items, equivalent to reducing 4,388 tons of carbon emissions³² through recycling.

GDS actively practices “technology for good and philanthropy together.” Employees voluntarily participate in the monthly “Monthly Donor” activity, donating idle items and contributing volunteer service during non-working hours. By empowering philanthropy with technology, GDS helps Buy42 achieve sustainable innovation that combines social good, environmental protection, and inclusive employment.



Empowerment
and Expansion

The system has been rolled out to 24 Buy42 stores across 6 cities nationwide. It has processed over 220,000 donated items to date, with 7,761 registered users and an average of 138 daily visits. Thanks to improved donor experience and faster item listing turnover, the number of individual donations increased by 71% year-on-year, with pricing value growing by 87%.



Efficiency
Improvement

The system precisely addresses efficiency bottlenecks in key processes such as donation receiving, classification, pricing, and listing. The average processing time per donated item has been reduced from 15 minutes to 4.5 minutes, representing an efficiency improvement of over 200%.



End-to-End
Transparency

The system achieves end-to-end transparent management from donation receipt to final sale. Donors can check the real-time status of their donated items via the mini-program. The system can automatically generate electronic donation certificates to express recognition and gratitude to donors.



Inclusive
Employment

More than 50% of Buy42’s employees are people with disabilities. The digital system, through streamlined and lightweight processes, creates a fair employment environment for colleagues with disabilities, enabling them to fully realize their personal value.

³² Calculate emission reductions in accordance with the EEIO standard.

Governance

GDS creates long-term value through sound governance. We continue to strengthen our corporate governance and ESG management frameworks, while reinforcing the foundations of risk management, compliance operations, data security, and intellectual property protection. These efforts drive high-quality corporate development.

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04



ESG Governance

Corporate Governance

GDS maintains a high-standard corporate governance structure to enhance operational compliance and decision-making transparency. The Board has established four dedicated committees – namely the Executive Committee, the Nomination and Corporate Governance Committee, the Audit Committee, and the Remuneration Committee – to achieve integrated, sustainable development that aligns economic performance with environmental and social values.

In 2025, the Company held a total of 9 Board meetings, with an overall director attendance rate of 79%. Board members serve a three-year term and are elected in accordance with election rules and through regular shareholder meetings to ensure effective Board operations.

Board members are appointed based on professional competence and industry experience, without restrictions related to ethnicity, race, gender, age, nationality, or cultural background. During the reporting period, the Board consisted of 11 members, including 5 independent directors and 2 female directors. Members bring diverse industry backgrounds in finance, internet, data centers, and real estate, with deep expertise in private equity, accounting, auditing, information security, and corporate governance. This diversified and international Board composition continues to broaden the Company’s development perspective and supports steady business expansion.

ESG Governance Framework

GDS has established a comprehensive sustainability governance system covering strategic planning, implementation, and performance review. Through clear allocation of responsibilities and cross-departmental coordination mechanisms, sustainability principles are integrated into corporate strategy and daily operations.

The Company continuously conducts sustainability risk identification and assessment, sets corresponding targets and action plans, and cascades these targets to business and functional departments. ESG and sustainability key performance progress is incorporated into senior management performance evaluation, ensuring closed-loop management that drives the effective implementation of sustainability initiatives and continuously strengthens the Company’s overall ESG governance capability, laying a solid foundation for long-term value creation.

Materiality Assessment

To fully understand stakeholder priorities, GDS regularly collects feedback from customers, employees, shareholders and investors, suppliers, regulators, and communities. Each year, the Company conducts a materiality assessment, identifying and prioritizing issues with significant impact on the Company based on both “financial materiality” and “impact materiality” dimensions. These issues are then integrated into strategic planning and risk management frameworks.

For detailed methodology and results of stakeholder identification and materiality assessment, please refer to **[Stakeholder Identification and Communication]** and **[Materiality Assessment]** in this report.



Enterprise Risk Management

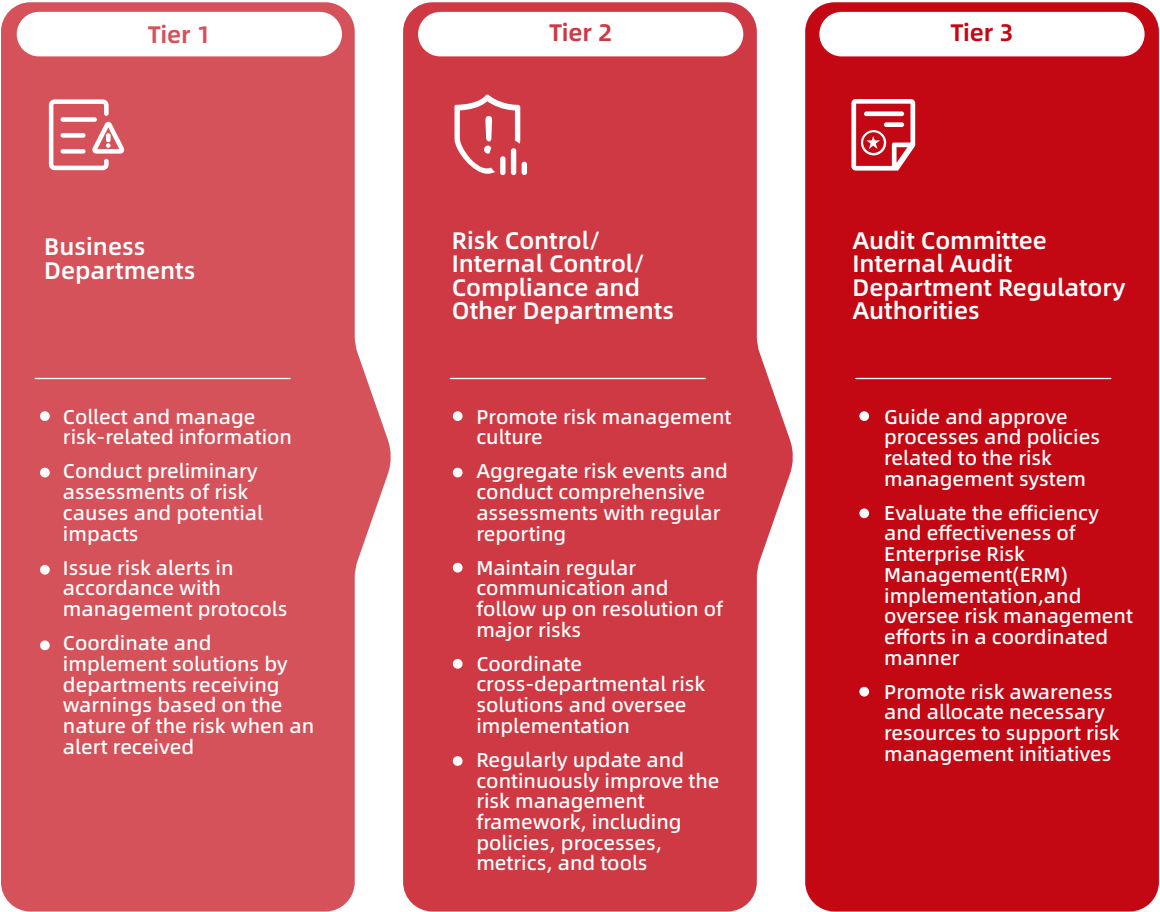
In the digital era, comprehensive risk management is essential for translating corporate strategy into results and achieving sustainable growth. GDS continues to strengthen its risk governance framework, with the Board at its core. It dynamically assesses external macroeconomic conditions and industry changes, integrates digital and intelligent technologies into risk management processes, and builds a forward-looking, systematic enterprise risk management system to enhance operational resilience.

Risk Management System

GDS has established a clear, multi-layered risk governance structure. The Board bears ultimate responsibility for risk management, the Audit Committee provides specialized oversight, and management oversees implementation. The Audit Committee coordinates the work of the Ethics Committee, Legal and Compliance, and Internal Control departments, promoting deep integration of risk management, corporate governance, and business ethics.

GDS has built an Enterprise Risk Management (ERM) framework aligned with the Sarbanes-Oxley Act (SOX) standards, clearly defining the responsibilities of the “tripartite risk management structure”. This enables comprehensive, ongoing, and effective monitoring of major risks and ensures standardized and systematic risk management operations.

Risk Management- 3 Tiers



Risk Management Process

GDS has developed a risk management framework and issued the *Risk Assessment Management Guidelines* based on the *Internal Control – Integrated Framework* issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). The guidelines are reviewed and updated annually, considering policy, business, and information technology developments to ensure continued applicability and effectiveness.

The Company implements a systematic and ongoing risk management process. Risk exposure reviews are conducted on a quarterly basis, and comprehensive risk assessments covering strategic, operational, financial, and compliance areas are organized with participation from all employees. These efforts enable the Company to promptly identify emerging changes such as computing power demand upgrades, technology architecture iterations, and market environment fluctuations, achieving “Detect, Alert, Resolve – All at the Earliest Stage”.



Response to Emerging Risks

GDS continuously monitors external dynamics such as geopolitics, technological evolution, regulatory changes, and market fluctuations. We systematically identify and manage related risks and opportunities to support stable operations and sustainable development.

The transition of computing architecture toward high-power graphics processing units (GPUs) places higher demands on data center infrastructure operations and maintenance. Global data security and privacy protection regulations are also continuously strengthening. At the same time, the Company must address governance challenges arising from the rapid iteration of AI technology, changes in global supply chain patterns, pressure from low-carbon energy transition, and the potential impact of climate change on infrastructure stability.

GDS continues to incorporate emerging risks and transition needs into its long-term risk management framework. We enhance resilience by deepening supply chain assessments, strengthening customer partnerships, reinforcing climate-adaptive design of infrastructure. We also continuously monitor frontier technologies and implement multiple measures to improve our management capabilities.

Building a Risk Management Culture

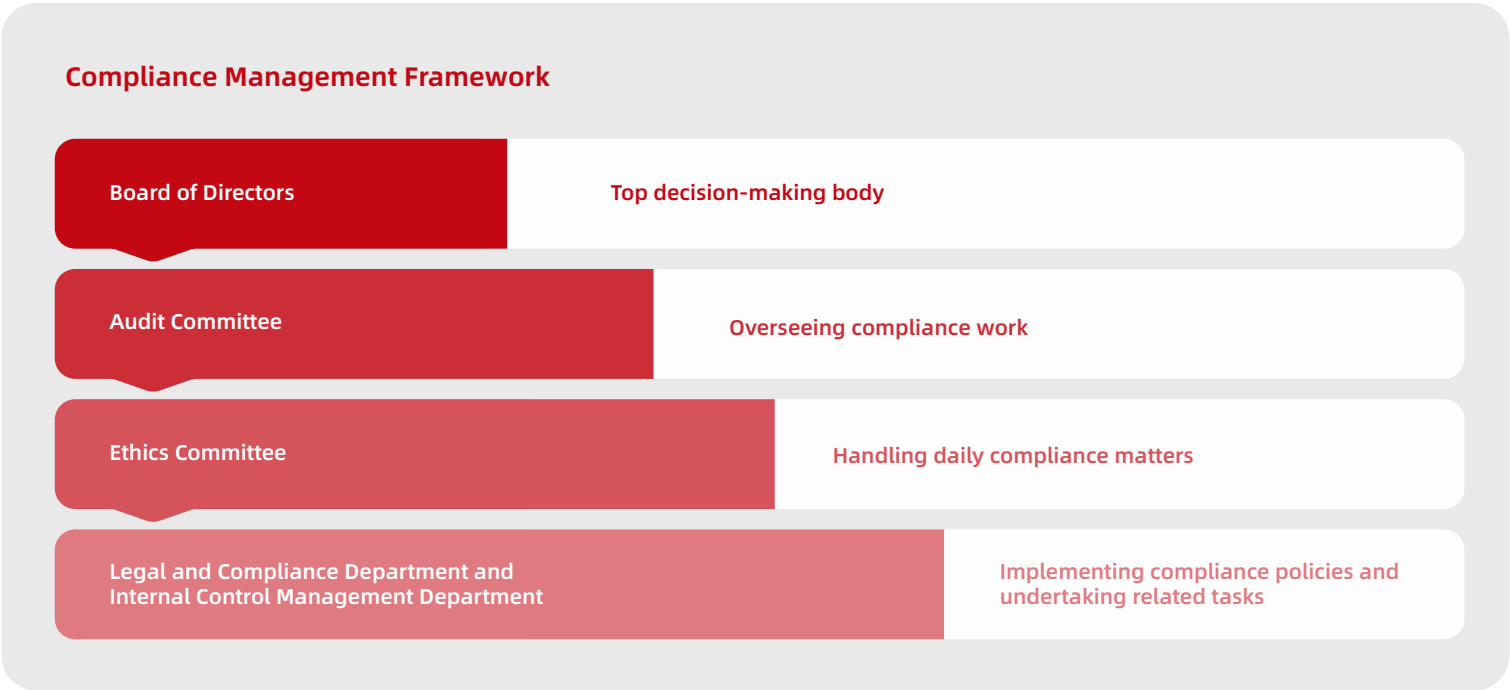
Through the “GDS Lecture”, online learning platforms, digital intelligence assistants, public accounts, and specialized seminars, GDS conducts organization-wide training on risk management principles and delivers regular risk management education to all non-executive directors. Training topics span information security, business ethics, compliance and internal control, asset protection, sustainability, and environment, health and safety (EHS). Risk criteria are also incorporated into the development of products and services.

Compliance Management and Business Ethics

A robust compliance management system and high standards of business ethics form an important foundation for GDS to achieve long-term stable development. The Company continues to optimize its compliance framework and deeply integrates compliance management into daily operations to effectively prevent and mitigate various risks, supporting high-quality and sustainable business development.

Compliance Management Framework

GDS maintains high compliance standards in areas such as operational governance, supplier management, and information disclosure. Our professional legal team provides full-process compliance support for asset management, financing activities, and various business operations. To ensure the effective implementation of compliance policies, the Company has established a compliance management structure and set compliance declaration requirements and measures for addressing non-compliance incidents. We strengthen process control to achieve standardized, ongoing, and closed-loop compliance management.



Anti-Corruption Compliance Culture

The Company adheres to the bottom line of integrity-based operation and abides by business ethics standards. We have consolidated internal anti-corruption and anti-bribery systems, and standardized the business conduct of external partners. We have established compliant transaction rules with partners through the compliance clauses and integrity commitment letters; refined management requirements for business hospitality review, gift giving and receiving; and regularly conducted third-party anti-fraud audits to ensure the efficient operation of the compliance system. During the reporting period, the Company had no expenditures related to political donations or political lobbying.

The Company continues to strengthen compliance culture building through internal promotion, training and other initiatives, to continuously improve employee awareness and risk response capabilities. In 2025, the company did not encounter any fraud-related legal disputes.

Responding to Emerging Compliance Requirements

In response to changes in the external regulatory environment, GDS actively tracks emerging compliance issues and improves relevant systems in areas such as export control and sanctions compliance management to support stable operations. The Company also conducts regular comprehensive screening of third-party partners to enhance compliance risk prevention capabilities.

Whistleblowing Mechanism

GDS has established a whistleblowing management system and implemented a full-process control mechanism covering whistleblowing acceptance, joint investigation, and closed-loop resolution. All employees and external stakeholders are encouraged to report all types of violations through multiple channels. The reporting channels are provided to all employees during on-boarding trainings. A joint investigation team has been established to review, analyze and follow up on reported issues, to ensure every report is handled properly. Effective measures are in place to protect whistleblower information and prevent retaliation.

Whistleblowing Channels

Email: Ethics@gds-services.com

Tel: +86-021-5831 5858



Data Security and Privacy Protection

Information Security Governance System

GDS complies with national laws and regulations such as the *National Security Law*, *Data Security Law*, and *Personal Information Protection Law*, and benchmarks against international standards to establish a comprehensive information security management system. We have developed core policies including the *Data Protection and Privacy Security Management System* and the *Information System Data Backup and Restoration Management System* to ensure the confidentiality, integrity, and availability of data. The *Sensitive Personal Information Handling Consent Form* is used to strictly regulate the handling of customer information. The Company's data security and privacy protection policies apply to all business line employees and suppliers, with relevant requirements incorporated into the *Employee Handbook*. Information security performance is included in employee performance evaluations, and a company-wide data security accountability mechanism has been established. The Company maintains a zero-tolerance policy toward information security and privacy violations, with disciplinary actions taken in accordance with regulations to reinforce the data security responsibility of all employees.



Information Security Management

GDS has established a three-tier information security management structure with clear responsibilities at each level, enabling coordinated, professional, and ongoing security governance.

Information Security Management Structure

Audit Committee (Board Level)

Serving as the Company's top decision-making body for information security, with full responsibility for overseeing cybersecurity, data privacy, and related matters. It includes senior information security experts to ensure professional strategic oversight.

Information Security Management Committee

Convening quarterly to guide and coordinate the Company's information security initiatives, with full responsibility for developing strategies and standards aligned with GDS's business objectives.

Information Security Management Working Group

Implementing the decisions and requirements of the Information Security Committee, along with security control measures execution, monitoring and handling of security incidents, as well as conducting of security awareness training.

Information Security Implementation and Operations

Data Protection Measures in the Development Phase



GDS integrates data security into the entire product and service development process from the outset, ensuring that security design is synchronized with business development. For external services, firewalls and web application firewalls (WAF) are deployed to strictly control public network exposure risks. Internal systems implement tiered access control and network isolation to precisely match business access needs. Production environments are strictly separated from development and testing environments to prevent unauthorized leakage of production data. Comprehensive vulnerability scanning and penetration testing are conducted before system launch to maintain security baselines.

Strengthening Business Continuity Assurance



GDS continues to deepen the integration of information security and business continuity management. We have established a closed-loop mechanism covering incident response, emergency support, and post-disaster recovery. By leveraging Infrastructure as Code architecture and equipment redundancy design, the Company ensures rapid recovery and stable availability even in extreme scenarios. Core critical data is subject to multi-layered backup management, and the system undergoes annual audits under the ISO 22301 Business Continuity Management System.

Based on a comprehensive self-assessment against the GB/T 42581 standard, the infrastructure of GDS's 83 self-operated data centers meets the highest level of business continuity standards, demonstrating industry-leading operational resilience for computing infrastructure.

Digital Intelligence Safety Protection



GDS has built a security protection system powered by digital intelligence, forming a closed-loop incident management process of “monitoring – response – recovery – reporting – continuous improvement.” This enables real-time monitoring, automated analysis, and rapid response to network threats, strengthening the overall security framework.

GDS has established a structured information security incident response and reporting mechanism. A dedicated security email address has been set up to encourage employees to proactively report risks and anomalies. Upon receipt, the information security team, together with relevant working groups, conducts preliminary analysis and classification according to the *Information Security Incident Management Policy* to ensure orderly and efficient handling. Incidents are classified into five levels (Level 0 to Level 4) based on cause, form, and severity, with corresponding response authority and reporting paths. Major incidents (Level 0, 1 and 2) are coordinated by the Information Security Management Committee, with reporting to the Audit Committee and relevant parties within one hour. Level 3 and 4 incidents are handled by the Information Security Working Group or administrators and technical teams respectively.

Case

In 2025, the Company built and deployed two major platforms—AISOC and Agent Security Management—leveraging digital intelligence technology to strengthen information security protection on one hand, while reinforcing the security line for AI's own full-process usage on the other. Through a unified portal, the platforms enable centralized digital intelligence application management, risk monitoring, and closed-loop remediation, thereby establishing a company-wide security foundation.

Intelligent Security Operation Platform

In security operations, AISOC drives the transformation of alert analysis from manual to intelligent, completing the vast majority of analysis and remediation recommendations before final human decision-making. The platform processes approximately 7 billion logs and 350,000 security alerts per month. Through intelligent analysis, alerts requiring manual handling are reduced to around 600, achieving a false positive filtering rate of 99.83%. Security incident response time has been shortened from hours to 3 minutes, and overall operational efficiency has increased by 5 to 10 times. Compliance audits have achieved approximately 80% automation, and the security false alarm filtering rate exceeds 99%, enabling 7×24 automatic response to cyberattacks. This allows the security team to focus on advanced threat analysis and in-depth risk governance.

Information Management Systems



GDS adheres to compliant and standardized security governance and continues to advance authoritative system certifications. We have obtained ISO 27001 Information Security Management System and ISO 27701 Privacy Information Management System certifications. These certifications cover the vast majority of the Company's self-operated data centers and core business systems. The Company's core business systems, including the IDC monitoring system, have passed the Security Level Protection Level 3 certification, establishing a standardized foundation for security management.

The Company has established a regular internal and external audit system and employee training mechanism. The Audit Committee conducts regular internal reviews and invites independent third-party institutions to perform external audits based on SOC2 and ISO series standards at least once every two years. We also actively accept audit supervision from the National Financial Regulatory Administration and customers. These efforts lay a solid institutional foundation for building a company-wide security culture. GDS conducts cybersecurity and data security awareness training for all employees (including regular employees and contractors) and regularly organizes phishing email simulation drills and other practical tests to enhance the organization's overall security awareness and protection capabilities.

In 2025, 100% of employees were covered by data security and privacy protection training, and no major cybersecurity incidents or privacy breaches occurred throughout the year.



Case

Responsible AI Governance

The Agent Security Management platform effectively addresses the challenges of AI Agent control, low visibility, and accountability. Currently, 47 Agents are under management, with capabilities covering identity recognition, behavior auditing, risk blocking, and full-chain traceability. Its self-developed security engine achieves a 99.6% accuracy rate in identifying malicious commands, effectively reducing repetitive work, lowering compliance costs, and improving the efficiency of risk discovery, remediation, and business launch.

Aligned with international technology trends, this system deeply integrates security operations and Agent governance, forming a platform-based, automated, and intelligent security capability. It provides robust support for the responsible application of AI, enhanced business resilience, and the prevention of security and compliance risks.

On-Premises Deployment and Privacy Protection

GDS relies on a comprehensive policy system, full-lifecycle technical protection, and regular employee assessments to fulfill customer data and privacy protection requirements. We embed privacy protection into the product and service development process, safeguarding personal privacy through relevant technologies. To strictly protect core data security, the Company deploys all core digital systems involving sensitive information on internal networks. Internal documents and core data are prohibited from being uploaded to external public clouds. Through internal network isolation, tiered access control, onboarding compliance agreements, and regular specialized training, GDS has built a secure and trustworthy internal digital intelligence application environment. This improves office and business processing efficiency while comprehensively protecting the Company's core digital assets and data privacy.



Data Lifecycle Security Management and Protection of Users' Legitimate Rights

GDS implements closed-loop data management throughout the entire data lifecycle, covering collection, storage, use, and destruction. This ensures that data processing is lawful, compliant, secure, controllable, and fully traceable, fully protecting users' rights to delete their personal data.

Data Collection



The Company strictly follows the data minimization principle and only collects information within the necessary scope for actual business needs. Visitor data is only collected after the visitor applies to visit a data center and agrees to the privacy policy, and is isolated from customer leasing data.

Data Use



Unless required by law or regulation, the Company does not actively collect third-party personal data or illegally rent, sell, or disclose users' personal information to external parties. If data use scenarios need to be expanded, users will be fully informed and explicit authorization will be obtained in accordance with the law.

Data Storage and Backup



The Company uses multi-layer encryption and disaster recovery backup. Customer personal data is stored in encrypted form, with the encryption keys held independently by the customer, achieving separation of data sovereignty and control.

Data Destruction



The Company fully respects and protects users' rights to access, correct, transfer, and delete the personal information they provide. When a user requests deletion of their personal information, or when the information exceeds the retention period, the Company will strictly comply with the Data Security Law and other relevant regulations by completely deleting or anonymizing the data to fulfill its deletion obligations, ensuring that the information is not retained in any form thereafter.

End-to-End Information Security in Supplier Collaborations

GDS has established an information security assurance system covering the entire supplier collaboration process.

Tendering and Selection Stage



The Company strictly reviews suppliers' information security system qualifications, conducts data transmission security and asset risk assessments, clearly defines security responsibilities in cooperation agreements, and requires partners to comply with the *Supplier Information Security Technical Management Requirements* and sign the *Sustainable Development Commitment Letter*.

Equipment Deployment Stage



Comprehensive penetration testing and security compliance verification are conducted to ensure that connected equipment and supporting systems fully comply with security standards.

Daily Collaboration Stage



Continuous monitoring is achieved through regular vulnerability scanning, penetration testing, dynamic risk assessment, and compliance audits. Software version verification and vulnerability remediation reviews are conducted every three years, forming a closed-loop "inspection - remediation - verification" management process. In 2024, the Company completed periodic specialized penetration testing for suppliers.

Collaboration Termination Stage



A dynamic assessment exit mechanism has been established to promptly terminate cooperation with suppliers that can no longer meet security compliance requirements, thereby controlling supply chain security risks at the source.

Intellectual Property Protection

Intellectual Property Management System

GDS regards intellectual property as an important intangible asset that strengthens competitiveness and supports sustainable business operations. The Company continues to build a standardized and systematic intellectual property management framework. We have formulated a total of 10 management policies, including the *GDS Intellectual Property Management Guidelines*, forming a comprehensive intellectual property management system. A cross-functional Intellectual Property Committee has been established, with members from legal, risk control, technology, finance, and other core functions. Through regular quarterly specialized meetings, the committee conducts technology evaluation, policy review, process optimization, and day-to-day decision-making to ensure orderly implementation of intellectual property work.

GDS has established an eight-dimensional comprehensive evaluation framework This enables full-category and full-process closed-loop management of intellectual property. In addition, the Company has launched an IP digital management system, leveraging technology to improve the precision and efficiency of management. We regularly conduct risk screening and monitoring to effectively prevent various IP compliance risks.



Intellectual Property Incentives and R&D Commercialization

GDS continues to improve its IP incentive mechanism. We updated the *Annual IP Reward Implementation Plan* to further encourage the commercialization of core technological achievements. In 2025, the Company conducted in-depth specialized research on intellectual property, producing a total of 7 competitors and clients patent research reports and compiling 2 patent risk lists. These efforts provide important decision-making support for intellectual property protection, ongoing management, and compliant development of overseas business.

The Company published 12 intellectual property science popularization articles throughout the year and organized 5 offline specialized training sessions to continuously enhance employees' awareness and professional capabilities in intellectual property protection.



As of the end of 2025

Annual new patent filings



50

Cumulative number of patents held



319

Stakeholder Identification and Communication

Stakeholders	Issues	Communication Channels
Customers	- Reliable and premium solutions - High-quality service and customer experience - Cybersecurity and data protection	- Privacy protection - Responsible AI
Shareholders & Investors	- Corporate governance - Risk management - ESG management	- Cybersecurity and data protection - Responsible AI
Employees	- Employee health and safety - Human capital development and talent attraction	- Employee training and development - Employee rights protection
Suppliers & Partners	- Development of environmentally friendly technologies - Supply chain management	- ESG management - Business ethics
Industry Peers	- Development of environmentally friendly technologies - Science and technology innovation management	- Reliable and premium solutions - Intellectual property protection - Business ethics
Government and Regulatory Authorities	- Development of environmentally friendly technologies - Corporate governance	- Cybersecurity and data protection - Intellectual property protection - Responsible AI
Non-profit Organizations, Industry Associations, and Alliances	- Climate change mitigation and energy management - Water resource management - Ecological and environmental protection	- Science and technology innovation management - Responsible AI
The Public and the Media	- Climate change mitigation and energy management - Science and technology innovation management - Reliable and premium solutions	- Cybersecurity and data protection - Responsible AI
Local Communities and the Environment	- Resource recycling and waste management - Environmental impact of buildings	- Ecological and environmental protection - Community engagement and social investment

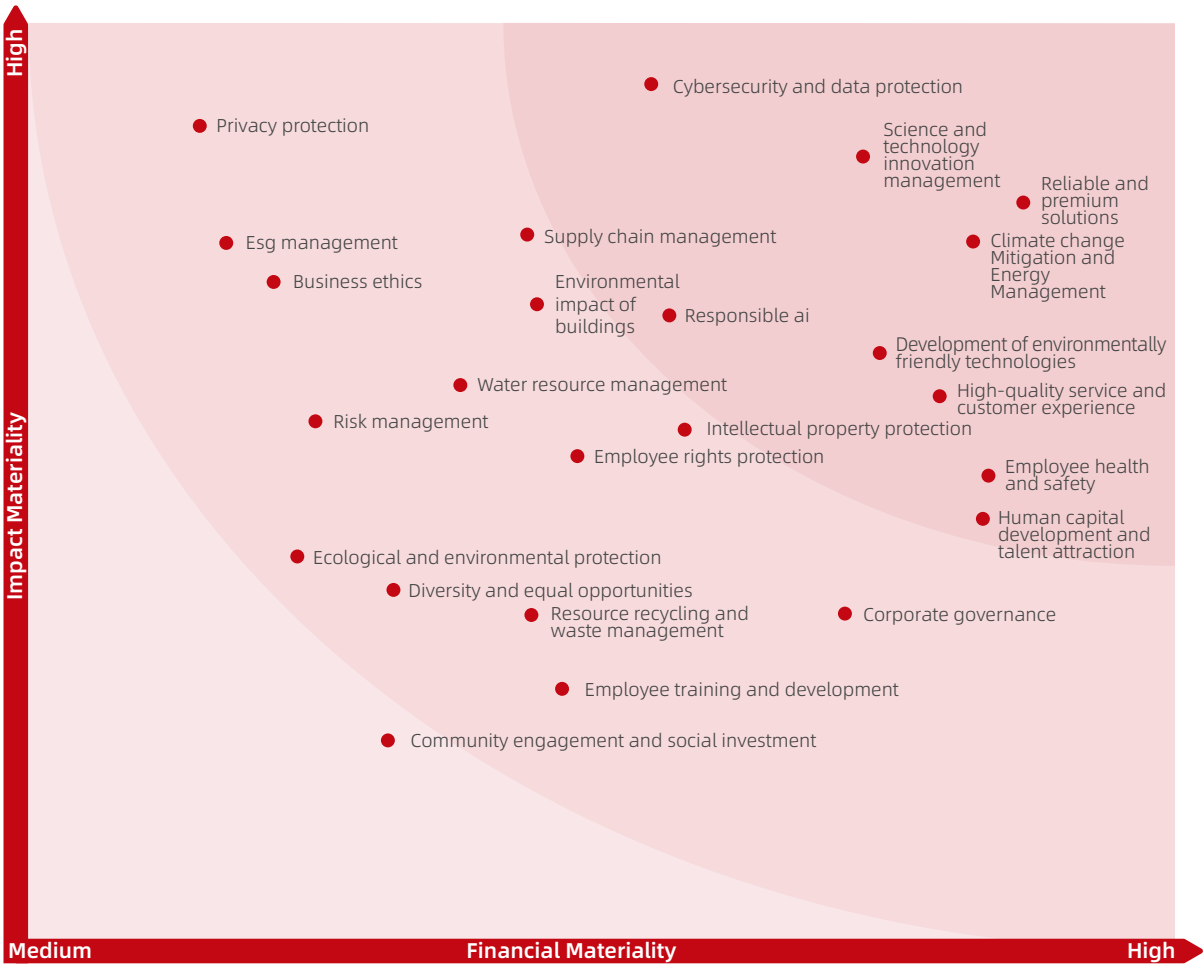
Materiality Assessment

In 2025, GDS conducted its annual materiality assessment update, with insights from macro policy analysis, industry research, and internal assessments. Each issue was evaluated through the dual perspectives of financial materiality and impact materiality. The objective was to identify strategically significant issues that meet the criteria of double materiality. With this approach, we aim to strengthen our ESG strategy and governance framework while effectively responding to the core expectations of our stakeholders. The materiality assessment has also been incorporated into the Company's enterprise risk management process.

Materiality Assessment Process

Research on the Internal and External Environments	We analyze external trends and the Company's business development strategies while identifying key stakeholders that interact most frequently with business operations.
Compilation of the Issue List	We benchmark our performance against global standards, macro-and industry-level policies, as well as peer practices. Based on industry characteristics, GDS's business model, and the overall value chain, 24 issues with financial or impact materiality were identified.
Materiality Analysis	Stakeholder engagement is conducted through surveys sent to internal and external groups. These include GDS's management, employees, customers, suppliers, and government regulators. The goal is to understand the importance of each issue from the perspective of different stakeholders. Impact Materiality Assessment: Evaluates the significance of each issue on the external environment and the broader society. Financial Materiality Assessment: Evaluates the significance of each issue on the Company's financial performance.
Issue Confirmation and Disclosure	The assessment results are submitted to the Sustainability Committee for validation. High and medium materiality issues are prioritized in the Company's sustainability management efforts.significance of each issue on the Company's financial performance.

2025 GDS Materiality Matrix



Sustainable Development Goals

Topic	Key Indicators	2030 Targets	2025 Progress
Environment	Carbon Neutrality	Operational carbon neutrality (i.e., Scope 1 and 2)	In 2025, GDS reported Scope 1 and Scope 2 GHG emissions of 1,316,725 tCO ₂ e, representing a 23.1% decrease from the 2023 base year.
	Percentage of Renewable Energy	100%	~60%
	Data Center ³³ Annual PUE	1.2	1.23
	Recycling Rate	Total waste volume reduced by 5% compared to 2024 100% reusable, recyclable, or compostable of nonhazardous waste	100% recycling of waste batteries
	Green Building Ratio	Achieve 100% green building certification of newly commissioned self-built data centers from 2020 onwards	90% of self-built data centers commissioned since 2020 have obtained or are applying for green building certifications.
Social	The Percentage of Female Employees ³⁴	≥ 20%	22.7%
	Female Percentage in Senior ManagementManagement	≥ 30%	34.5%
	Total Recordable Incident Rate (TRIR)	≤ 1.0	0.054
Governance	Compliance and Anti-corruption Training	100% of full-time employees	2025 full-staff compliance training coverage: 100%
	Business Ethics Compliance System Certification	Ongoing Third-Party Certification of the Compliance System	GDS upholds the bottom line of integrity in business operations and strictly adheres to business ethics standards. It has established a mechanism covering whistleblowing acceptance, joint investigation, and closed-loop handling. The Company also conducts regular third-party anti-fraud audits to continuously ensure the efficient operation of its compliance system.
	Proportion of Independent Directors	≥ 40%	45%
	Anti-corruption Audits	Audit once every two years to assess the implementation of anti-corruption policies and regulations	Company-wide anti-corruption audits are conducted every two years
	Cybersecurity Training	100% of full-time employees	In 2025, 100% of employees were covered by data security and privacy protection training

³³ Data centers that come into operation after 2020, with utilization rate ≥ 30%, and with new technology and architecture applied.

³⁴ The scope of statistics does not encompass 24/7 operations and maintenance roles.

SBTi Near-Term Target and Net-Zero Target

In January 2025, GDS officially received SBTi validation for its 1.5°C near-term target. In October 2025, GDS officially received SBTi validation for its net-zero target.

Overall Net-Zero Target

GDS Holdings Limited commits to achieve net-zero greenhouse gas emissions across the value chain by 2050.

net-zero

SBTi Targets

2030 Near-Term Targets

To align with the *Paris Agreement's* 1.5°C temperature goal, GDS Holdings Limited commits to reduce absolute scope 1 and 2 GHG emissions 43.6% by 2030 from a 2023 base year. GDS Holdings Limited also commits to reduce scope 3 GHG emissions from purchased goods and services, fuel- and energy-related activities and downstream leased assets 51.6% per USD value added³⁵ within the same timeframe.

By 2030
reduce Scope 1 and 2 GHG emissions by
43.6% ▼
reduce Scope 3 GHG emissions from specific categories per USD value added by
51.6% ▼

2050 Long-Term Targets

GDS Holdings Limited commits to reduce absolute scope 1 and 2 GHG emissions 90.0% by 2050 from a 2023 base year. GDS Holdings Limited also commits to reduce scope 3 GHG emissions 97.0% per USD value added within the same timeframe.

By 2050
reduce Scope 1 and 2 GHG emissions by
90% ▼
reduce Scope 3 GHG emissions per USD value added by
97% ▼

2025 Progress

In 2025, GDS reported Scope 1 and Scope 2 GHG emissions of 1,316,725 tCO₂e, representing a 23.1% decrease from the 2023 base year.

Total Scope 3 GHG emissions amounted to 570,892.33 tCO₂e. Of this, emissions from purchased goods and services, fuel- and energy-related activities, and downstream leased assets totaled 537,585.44 tCO₂e, with an intensity of 1,454.07 tCO₂e per USD value added, representing a 67.46% decrease compared with 2023.



representing a decrease from the 2023 base year
23.1% ▼



representing a decrease per USD value added from the 2023 base year
67.5% ▼

³⁵ Prepared in accordance with Chinese Accounting Standards: Value Added = Gross Profit = Operating Revenue - Operating Costs.

Key Performance Indicators (KPI) Table^{36 37}

Indicators		2025	2024	2023
Environment				
Greenhouse Gas (GHG) Emissions				
Greenhouse Gas (GHG) Emissions	Total GHG emissions (location-based) (metric tons of CO ₂ equivalent)	4,480,352	3,795,396	4,396,860
	Total GHG emissions (market-based) (metric tons of CO ₂ equivalent)	1,887,617	2,480,007	3,365,038
	Scope 1 direct emissions	62,759	63,279	35,373
	Scope 2 indirect emissions (location-based)	3,315,394	2,537,785	2,708,764
	Scope 2 indirect emissions (market-based)	1,253,966	1,389,065	1,676,942
	Scope 3 value chain emissions (location-based)	1,102,199	1,194,332	1,652,723
	Scope 3 value chain emissions (market-based)	570,892	1,027,663	-
	Scope 3-1 Purchased goods and services	33,985	93,151	684,423
	Scope 3-2 Capital goods	26,975	28,010	33,060
	Scope 3-3 Fuel and energy related activities	503,601	550,360	525,698
	Scope 3-4 Upstream transportation and distribution	4,544	7,929	26,419
	Scope 3-5 Waste generated in operations	122	99	137
	Scope 3-6 Business travel	780	1,349	793
	Scope 3-7 Employee commuting	721	619	637
	Scope 3-8 Upstream leased assets	159	171	189
	Scope 3-13 Downstream leased assets (location-based)	531,307	512,640	381,359
	Scope 3-13 Downstream leased assets (market-based)	-	345,971	-
	Scope 3-15 Investments	5	5	5
	GHG emission intensity (location-based) - Scope 1 + Scope 2 (metric tons CO ₂ e per million USD Revenue)	2,066.41	1,839.35	1,956.82
	GHG emissions Intensity (market-based) - Scope 1 + Scope 2 (metric tons CO ₂ per million USD Revenue)	805.44	1,027.03	1,221.04
	Total carbon trading volume (metric tons)	72,015	113,334	61,788
Energy Consumption				
Energy	Average PUE of data centers	1.23	1.24	1.28
	Total energy consumption (GWh)	6,547	6,256	5,429
	Gasoline (liters)	28,504	32,760	37,607
	Diesel (liters)	761,112	816,037	766,606

³⁶ Certain figures in the table have been rounded, which may result in minor discrepancies between subtotals and totals. These differences are within the acceptable range of calculation error and do not indicate any distortion of the data.

³⁷ Some data was not disclosed in 2023 and is represented by "-" in the table.

Indicators		2025	2024	2023
	Renewable energy (GWh)	3,800 ³⁸	2,141	1,809
	Percentage of renewable energy in total consumption (%)	60	40	38
	Energy Intensity (MWh per 1,000 USD)	4.00	4.42 ³⁹	3.87
Green Buildings				
	Percentage of self-built data centers commissioned since 2020 that have obtained or are in the process of applying for green building certification (%)	90	87	87
	Total number of data centers that have obtained green certificates (units)	45	42	41
Waste Management				
Waste Management	Total solid waste (metric tons)	1,073	739	810
	Total hazardous waste (metric tons)	6,045	2,510	2,384
	Hazardous waste recovery rate (%)	100%	100%	100%
	Total waste recycled (metric tons)	4931	2510	2384
	Total waste disposed (metric tons)	2186	3249	3194
	Waste landfilled (metric tons)	110	242	238
	Waste incinerated with energy recovery (metric tons)	1850	2680	2635
Water Resource Management				
Water Resource Management	Total water consumption (metric tons)	10,589,149	8,061,445	7,056,290
	Water consumption intensity (metric tons/1,000 USD)	6.48	5.70 ³⁹	5.03
	WUE	1.69	1.66	1.72
Society				
Products and Services				
	Number of data centers certified with Uptime M&O (units)	29	26	36
	Number of regions certified with Uptime M&O (units)	4	4	4
	Number of complaints regarding products or services	31	22	15
	Complaint response rate (%)	100	100	100
	Complaint resolution rate (%)	100	100	100
	Customer satisfaction score (out of 10)	9.70	9.68	9.65
	Net promoter score (%)	92	91	85
Employment Management				
Total number of employees (persons) ⁴⁰	Total number of employees (persons)	2,434	2,276	2,345

³⁸ This figure covers direct green power procurement, on-site self-generation (e.g., solar PV), green electricity procured through long-term Power Purchase Agreements (PPAs), Renewable Energy Certificates (RECs), and other environmental attributes,

including but not limited to those generated and retired in 2025.

³⁹ Updated based on net revenue from 2024 Annual Report.

⁴⁰ All data on the total number of employees, as well as statistics by gender, age, and function, pertain exclusively to full-time employees of GDS.

Indicators		2025	2024	2023
Employees by type (persons)	Number of full-time employees (persons)	2,434	2,123	2,345
	Number of part-time employees (persons)	221	153	-
Employees by age (%)	30 years old and under	33.28	30.00	34.00
	Between 30 and 50 years old	64.01	67.00	63.00
	50 years and older	2.71	3.00	2.00
Employees by ethnicity (%)	Han ethnicity	95.52	96.00	89.00
	Other ethnic minorities	4.48	4.00	11.00
Employees by nationality (%)	Foreign employees	0.04	0.20	-
Percentage of managerial staff (%)		1.19	1.00	-
Percentage of technical staff (%)		2.71	3.00	-
Percentage of employees with disabilities (%)		0.82	1.00	-
Number of newly hired employees (persons)	Number of newly hired employees (persons)	461	402	551
Number of newly hired employees by gender (persons)	Male	414	364	490
	Female	47	38	61
Employee turnover rate				
Employee turnover rate by gender (%)	Employee turnover rate (%)	12.84	13.00	16.50
	Male	12.37	14.00	-
	Female	12.90	7.00	-
Employee turnover rate by age (%)	30 years old and under	16.17	14.00	-
	Between 30 and 50 years old	10.65	13.00	-
	50 years and older	9.09	16.00	-
Employee turnover rate by job level (%)	Frontline employees	12.66	13.00	-
	Middle management	10.57	9.00	-
	Senior management	13.79	13.00	-
Voluntary turnover rate (%)		10.68	11.00	13.20
Employee satisfaction survey scores		90+	90+	90+
Training and Development				
Average annual training hours per employee by gender (hours)	Male ⁴¹	35.90	36.00	36.40
	Female	11.50	12.50	8.50
Average annual training hours per employee (hours)	Average annual training hours per employee	32.70	32.40	32.10
Average annual training hours per employee by level (hours)	Grassroots staff	36.80	35.90	36.20
	Middle management staff	6.34	11.80	7.00
	Senior management staff	5.08	7.70	5.40

⁴¹ The Company, in principle, provides equal training opportunities to both male and female employees. Individual training hours vary only by job role. For example, frontline staff in operations and maintenance teams are required to undergo additional specialized training each year, and since a higher proportion of these team members are male, the total training hours for male employees are higher than those for female employees.

Indicators		2025	2024	2023
Percentage of employees who undergo regular performance and career development evaluations (%)	Percentage of employees who undergo regular performance and career development evaluations	100	100	100
	Male	100	100	100
	Female	100	100	100
Internal employee transfer proportion (%)		7.81	7.00	9.00
Average investment in each employee training (RMB)		492.00	438.00	-
Diversity, Fairness, and Inclusion				
Proportion of female employees at each level/function (%)	Percentage of female employees	22.68	23.00	15.00
	Proportion of women in all management positions	28.57	28.62	-
	Proportion of women in middle management	27.92	27.75	27.00
	Proportion of women in senior management	34.48	31.58	30.00
	Female percentage in revenue-generating roles	42.34	41.00	-
	Proportion of women in STEM positions	16.67	17.00	-
Gender pay ratio by job level (female to male) (%)	Frontline employees	117.54	129.00	128.00
	Middle management	110.35	111.00	117.00
	Senior management	96.00	121.00	108.00
Gender pay gap among employees (%)	Average salary difference	-2.00	-8.00	-9.00
	Median pay gap	3.00	2.00	6.00
	Median bonus gap	5.00	6.00	1.00
Parental Leave				
Employees entitled to parental leave (persons)	Total	2,434	2,276	-
	Male	2,093	1,938	-
	Female	341	338	-
Occupational Health and Safety				
Employee physical examination rate (%)		100	100	100
Total recordable incident rate (TRIR)		0.05	0.10	0.09
Number of recordable work-related injuries (persons)		3	5	3
Number of severe work-related injuries (persons)		0	0	0
Number of deaths caused by work-related injuries (persons)		0	0	0
Mortality rate due to work-related injuries (%)		0	0	0
Supplier Management				
Percentage of suppliers required to complete third-party due diligence questionnaires (%)		100	100	100
Percentage of suppliers required to sign the Sustainability Commitment Letter (%)		100	100	100
Percentage of suppliers required to undergo EHS audits (%)		100	100	100

Indicators		2025	2024	2023
Total number of suppliers	Total number of suppliers	1,496	1,017	1,472
	East China	482	412	480
	North China	671	384	448
	South China	230	183	213
	West China	113	38	44
	Hong Kong SAR, Macao SAR and overseas countries/regions	-	-	287
Total number of suppliers - By region				
Charity				
Amount of philanthropic investment (RMB 10,000)		500	230	170
Governance				
Corporate Governance				
Audits of the implementation of anti-corruption policies	Independent directors (persons)	5	5	5
	Proportion of independent directors (%)	45%	45%	45%
Board composition	Female directors (number)	2	2	2
	Percentage of female directors (%)	18%	18%	18%
Director attendance rate (%)		79%	82%	-
Number of Board Meetings (times)		9	12	13
Compliance and Anti-corruption				
Percentage of employees who received compliance and anti-corruption training (%)		100	100	100
Intellectual Property Management				
Number of new patent applications (units)		50	49	55
Total number of patent applications (units)		319	269	220
Percentage of invention patents in the current year (%)		40	47	49
Number of newly authorized patents (units)		32	18	35
Total number of authorized patents (units)		191	159	141
Number of newly added software copyrights (units)		22	28	20
Total number of software copyrights (units)		253	231	203
Number of newly added trademarks (units)		7	22	74
Total number of trademarks (units)		252	245	223

Indicators		2025	2024	2023
Data and Privacy Security				
Major cybersecurity incidents (occurrences)		0	0	0
Total monetary loss due to legal proceedings related to user privacy (RMB)		0	0	0
Number of data breaches (times)		0	0	0
Percentage of personal data breach incidents (%)		0	0	0
Total number of employees and users affected by data breaches (persons)		0	0	0
Number of service disruptions due to performance issues (times)		0	0	0
Total customer downtime (days)		0	0	0
Number of substantiated complaints concerning breaches of customer privacy (cases)	Number of substantiated complaints from external parties	0	0	0
	Number of complaints from regulatory authorities	0	0	0
Total number of confirmed incidents of customer data breaches, thefts, or losses (cases)		0	0	0
Percentage of employees who have received data security training (%)		100	100	100

HKEX Environmental, Social and Governance Reporting Code Content Index

Environmental

Aspects

KPIs

Chapters

A1: Emissions

General Disclosure
Information on:
(a) the policies; and
(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.

A1.1 The types of emissions and respective emissions data.

A1.3 Total hazardous waste produced (in tonnes) and, where appropriate,intensity (e.g. per unit of production volume, per facility).

A1.4 Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).

A1.5 Description of emission target(s) set and steps taken to achieve them.

A1.6 Description of how hazardous and non-hazardous wastes are handled,and a description of reduction target(s) set and steps taken to achieve them.

Climate Change and Energy Management
Water Resource Management
Circular Economy

Key Performance Indicators (KPI) Table

Key Performance Indicators (KPI) Table

Key Performance Indicators (KPI) Table

Climate Change and Energy Management
Circular Economy

Circular Economy
Sustainable Development Goals

A2: Use of Resources

General Disclosure
Policies on the efficient use of resources, including energy, water and other rawmaterials.

A2.1 Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per unit of production volume, per facility).

A2.2 Water consumption in total and intensity (e.g. per unit of production volume, per facility).

A2.3 Description of energy use efficiency target(s) set and steps taken to achieve them.

A2.4 Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.

A2.5 Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.

Climate Change and Energy Management
Water Resource Management
Circular Economy

Key Performance Indicators (KPI) Table

Key Performance Indicators (KPI) Table

Climate Change and Energy Management
Water Resource Management
Circular Economy
Sustainable Development Goals

Water Resource Management

/

A3: The Environment and Natural Resources

General Disclosure
Policies on minimising the issuer's significant impacts on the environment and natural resources.

A3.1 Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.

Climate Change and Energy Management
Water Resource Management
Circular Economy

Climate Change and Energy Management
Water Resource Management
Circular Economy

Social

Aspects

KPIs

Chapters

B1:
Employment

General Disclosure
Information on:
(a) the policies; and
(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.

Human Capital Development

B1.1 Total workforce by gender, employment type (for example, full- or parttime),age group and geographical region.

Key Performance Indicators (KPI) Table

B1.2 Employee turnover rate by gender, age group and geographical region.

Key Performance Indicators (KPI) Table

B2:
Health and Safety

General Disclosure
Information on:
(a) the policies; and
(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards.

Human Capital Development
Employee Health and Safety

B2.1 Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.

Key Performance Indicators (KPI) Table

B2.2 Lost days due to work injury.

Key Performance Indicators (KPI) Table

B2.3 Description of occupational health and safety measures adopted, and how they are implemented and monitored.

Employee Health and Safety

B3:
Development and Training

General Disclosure
Policies on improving employees’ knowledge and skills for discharging duties at work. Description of training activities.

Talent Development and Training

B3.1 The percentage of employees trained by gender and employee category (e.g. senior management, middle management).

Key Performance Indicators (KPI) Table

B3.2 The average training hours completed per employee by gender and employee category.

Talent Development and Training
Key Performance Indicators (KPI) Table

B4:
Labour Standards

General Disclosure
Information on:
(a) the policies; and
(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.

Employee Engagement

B4.1 Description of measures to review employment practices to avoid child and forced labour.

Employee Engagement

B4.2 Description of steps taken to eliminate such practices when discovered.

Employee Engagement

Aspects	KPIs	Chapters
B5: Supply Chain Management	General Disclosure Policies on managing environmental and social risks of the supply chain.	Value Chain Ecosystem Development
	B5.1 Number of suppliers by geographical region.	Key Performance Indicators (KPI) Table
	B5.2 Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	Value Chain Ecosystem Development
	B5.3 Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	Value Chain Ecosystem Development
	B5.4 Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	Value Chain Ecosystem Development
B6: Product Responsibility	General Disclosure Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising,labelling and privacy matters relating to products and services provided and methods of redress.	/
	B6.1 Percentage of total products sold or shipped subject to recalls for safety and health reasons.	/
	B6.2 Number of products and service related complaints received and how they are dealt with.	Service and Customer Experience
	B6.3 Description of practices relating to observing and protecting intellectual property rights.	Intellectual Property Protection
	B6.4 Description of quality assurance process and recall procedures.	/
	B6.5 Description of consumer data protection and privacy policies, and how they are implemented and monitored.	Data Security and Privacy Protection
B7: Anti-corruption	General Disclosure Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering.	Anti-Corruption Compliance Culture Whistleblowing Mechanism
	B7.1 Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	Anti-Corruption Compliance Culture Whistleblowing Mechanism
	B7.2 Description of preventive measures and whistle-blowing procedures,and how they are implemented and monitored.	Compliance Management and Business Ethics
	B7.3 Description of anti-corruption training provided to directors and staff.	Compliance Management and Business Ethics

Climate-related Disclosures

Aspects	KPIs	Chapters
B8: Community Investment	General Disclosure	
	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	Community Engagement
	B8.1 Focus areas of contribution (e.g. education, environmental concerns,labour needs, health, culture, sport).	Community Engagement
	B8.2 Resources contributed (e.g. money or time) to the focus area.	Community Engagement
Governance	Governance	GDS Climate Action and Carbon Neutrality Plan
Strategy	Climate-related risks and opportunities	GDS Climate Action and Carbon Neutrality Plan
	Business model and value chain	GDS Climate Action and Carbon Neutrality Plan
	Strategy and decision-making	GDS Climate Action and Carbon Neutrality Plan
	Financial position, financial performance and cash flows	GDS Climate Action and Carbon Neutrality Plan
	Climate resilience	GDS Climate Action and Carbon Neutrality Plan
Risk Management	Financial impacts of climate-related risks and opportunities	GDS Climate Action and Carbon Neutrality Plan
Metrics and Targets	Risk Management	GDS Climate Action and Carbon Neutrality Plan
	Greenhouse gas emissions	Key Performance Indicators (KPI) Table
	Climate-related transition risks	GDS Climate Action and Carbon Neutrality Plan
	Climate-related physical risks	GDS Climate Action and Carbon Neutrality Plan
	Climate-related opportunities	GDS Climate Action and Carbon Neutrality Plan
	Capital deployment	GDS Climate Action and Carbon Neutrality Plan
	Internal carbon prices	/
	Remuneration	/
	Industry-based metrics	GDS Climate Action and Carbon Neutrality Plan
	Climate-related targets	GDS Climate Action and Carbon Neutrality Plan
	Applicability of cross-industry metrics and industry-based metrics	/

GRI Sustainability Reporting Standards Content Index

Instructions

This Report has been prepared by GDS with reference to the Global Reporting Initiative (GRI) Standards. The reporting period covers January 1, 2025, to December 31, 2025.

GRI 1 Used

GRI 1: Foundation 2021

GRI Standards	Disclosure	Sections in the Report
GRI 2: General Disclosures 2021	2-1 Organizational details	Our Business Overview
	2-2 Entities included in the organization's sustainability reporting	Reporting Scope
	2-3 Reporting period, frequency, and contact point	Reporting Scope
		Contact Us
	2-5 External assurance	External Assurance
	2-6 Activities, value chain, and other business relationships	Our Business Overview
		Materiality Assessment
		Stakeholder Identification and Communication
	2-7 Employees	Key Performance Indicators (KPI) Table
	2-8 Workers who are not employees	Key Performance Indicators (KPI) Table
	2-9 Governance structure and composition	Corporate Governance
	2-10 Nomination and selection of the highest governance body	Corporate Governance
	2-11 Chair of the highest governing body	Corporate Governance
		Corporate Governance
		ESG Governance Framework
		Climate Change and Energy Management
	2-12 Role of the highest governance body in overseeing sustainability impacts	Enterprise Risk Management
		Compliance Management and Business Ethics
		Data Security and Privacy Protection
		ESG Governance Framework
	2-13 Delegation of responsibility for managing sustainability impacts	Climate Change and Energy Management
		Enterprise Risk Management
		Compliance Management and Business Ethics
		Data Security and Privacy Protection
	2-14 Role of the highest governance body in sustainability reporting	Materiality Assessment
	2-16 Communication of key issues	ESG Governance Framework
		Stakeholder Identification and Communication
		ESG Governance Framework
	2-17 Collective knowledge of the highest governance body	ESG Governance Framework

GRI Standards

Disclosure

Sections in the Report

GRI 2:
General Disclosures 2021

- 2-19 Remuneration policy
- 2-20 Process to determine remuneration
- 2-22 Statement on sustainable development strategy

- Compensation and Benefits
- Compensation and Benefits
- Performance Management
- Sustainability Strategy
- ESG Governance Framework
- Climate Change and Energy Management
- Waste Management
- Human Capital Development
- Employee Health and Safety
- Community Engagement
- Risk Management Process
- Compliance Management and Business Ethics
- Data Security and Privacy Protection

- 2-23 Policy commitments

- ESG Governance Framework
- Climate Change and Energy Management
- Community Engagement
- Corporate Governance
- Risk Management System
- Compliance Management and Business Ethics
- Data Security and Privacy Protection

- 2-24 Embedding policy commitments

- 2-25 Processes to remediate negative impacts

- Service and Customer Experience
- Stakeholder Identification and Communication
- Service and Customer Experience
- Employee Communication and Grievance Mechanism
- Compliance Management and Business Ethics

- 2-26 Mechanisms for seeking advice and raising concerns

- 2-27 Comply with laws and regulations

- Information Security Governance System
- Key Performance Indicators (KPI) Table

- 2-29 Approach to stakeholder engagement

- Stakeholder Identification and Communication

GRI 3:
Material Topics 2021

- 3-1 Process to determine material topics
- 3-2 List of material topics
- 3-3 Management of material topics

- Materiality Assessment
- Materiality Assessment
- Materiality Assessment

GRI Standards	Disclosure	Sections in the Report
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Our Business Overview
		Key Performance Indicators (KPI) Table
	201-2 Financial implications and other risks and opportunities due to climate change	Climate Change and Energy Management
		Climate Change and Energy Management
GRI 203: Indirect Economic Impacts 2016	201-3 Defined benefit plan obligations and other retirement plans	Compensation and Benefits
	203-1 Infrastructure investments and services supported	Value Chain Ecosystem Development
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Anti-Corruption Compliance Culture Whistleblowing Mechanism
	205-2 Communication and training on anti-corruption policies and procedures	Compliance Management and Business Ethics
	205-3 Confirmed incidents of corruption and actions taken	Anti-Corruption Compliance Culture Whistleblowing Mechanism
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Key Performance Indicators (KPI) Table
	302-2 Energy consumption outside the organization	Key Performance Indicators (KPI) Table
	302-3 Energy intensity	Key Performance Indicators (KPI) Table
	302-4 Reduction of energy consumption	Climate Change and Energy Management
		Key Performance Indicators (KPI) Table
	302-5 Reductions in energy requirements of products and services	Climate Change and Energy Management
GRI 303: Water and Effluents 2018	303-1 Organizational interactions with water as a shared resource	Water Resource Management
	303-2 Management of water discharge-related impacts	Water Resource Management
	303-3 Water withdrawal	Key Performance Indicators (KPI) Table
	303-4 Water discharge	Key Performance Indicators (KPI) Table
	303-5 Water consumption	Key Performance Indicators (KPI) Table
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to protected areas and areas of high biodiversity value outside protected areas	GDS has no operational sites located in or adjacent to areas of high biodiversity value outside protected areas.
	304-2 Significant impacts of activities, products, and services on biodiversity	
	304-3 Habitats protected or restored	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Key Performance Indicators (KPI) Table
	305-2 Energy indirect (Scope 2) GHG emissions	Key Performance Indicators (KPI) Table

GRI Standards	Disclosure	Sections in the Report
GRI 306: Waste 2020	305-3 Other indirect (Scope 3) GHG emissions	Key Performance Indicators (KPI) Table
	305-4 GHG emissions intensity	Key Performance Indicators (KPI) Table
	305-5 Reduction of GHG emissions	Key Performance Indicators (KPI) Table
	306-1 Waste generation and significant waste-related impacts	Waste Management
	306-2 Management of significant waste-related impacts	Waste Management
GRI 308: Supplier Environmental Assessment 2016	306-3 Waste generated	Key Performance Indicators (KPI) Table
	308-1 New suppliers that were screened using environmental criteria	Value Chain Ecosystem Development
GRI 401: Employment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	Value Chain Ecosystem Development
	401-1 New employee hires and employee turnover	Key Performance Indicators (KPI) Table
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Compensation and Benefits
	401-3 Parental leave	Compensation and Benefits
GRI 403: Occupational Health and Safety 2018		Key Performance Indicators (KPI) Table
	403-1 Occupational health and safety management system	Employee Health and Safety
	403-2 Hazard identification, risk assessment, and incident investigation	Employee Health and Safety
	403-3 Occupational health services	Employee Health and Safety
	403-4 Worker participation, consultation, and communication on occupational health and safety	Employee Communication and Grievance Mechanism
		Employee Health and Safety
	403-5 Worker training on occupational health and safety	Employee Health and Safety
	403-6 Promotion of worker health	Employee Health and Safety
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Employee Health and Safety
	403-8 Workers covered by an occupational health and safety management system	Employee Health and Safety
GRI 404: Training and Education 2016		Key Performance Indicators (KPI) Table
	404-1 Average hours of training per year per employee	Talent Development and Training
		Key Performance Indicators (KPI) Table
	404-2 Programs for upgrading employee skills and transition assistance programs	Talent Development and Training
	404-3 Percentage of employees receiving regular performance and career development reviews	Key Performance Indicators (KPI) Table

GRI Standards	Disclosure	Sections in the Report
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Corporate Governance
	405-2 Ratio of basic salary and remuneration of women to men	Human Capital Development
GRI 406: Anti-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Diversity and Equal Opportunity
		Key Performance Indicators (KPI) Table
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Human Capital Development
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Human Capital Development
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Human Capital Development
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples and actions taken	Human Capital Development
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Community Engagement
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Value Chain Ecosystem Development
	414-2 Negative social impacts in the supply chain and actions taken	Value Chain Ecosystem Development
GRI 415: Public Policy 2016	415-1 Political contributions	Anti-Corruption Compliance Culture Whistleblowing Mechanism
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Information Security Governance System

Nasdaq's ESG Reporting Guide Content Index

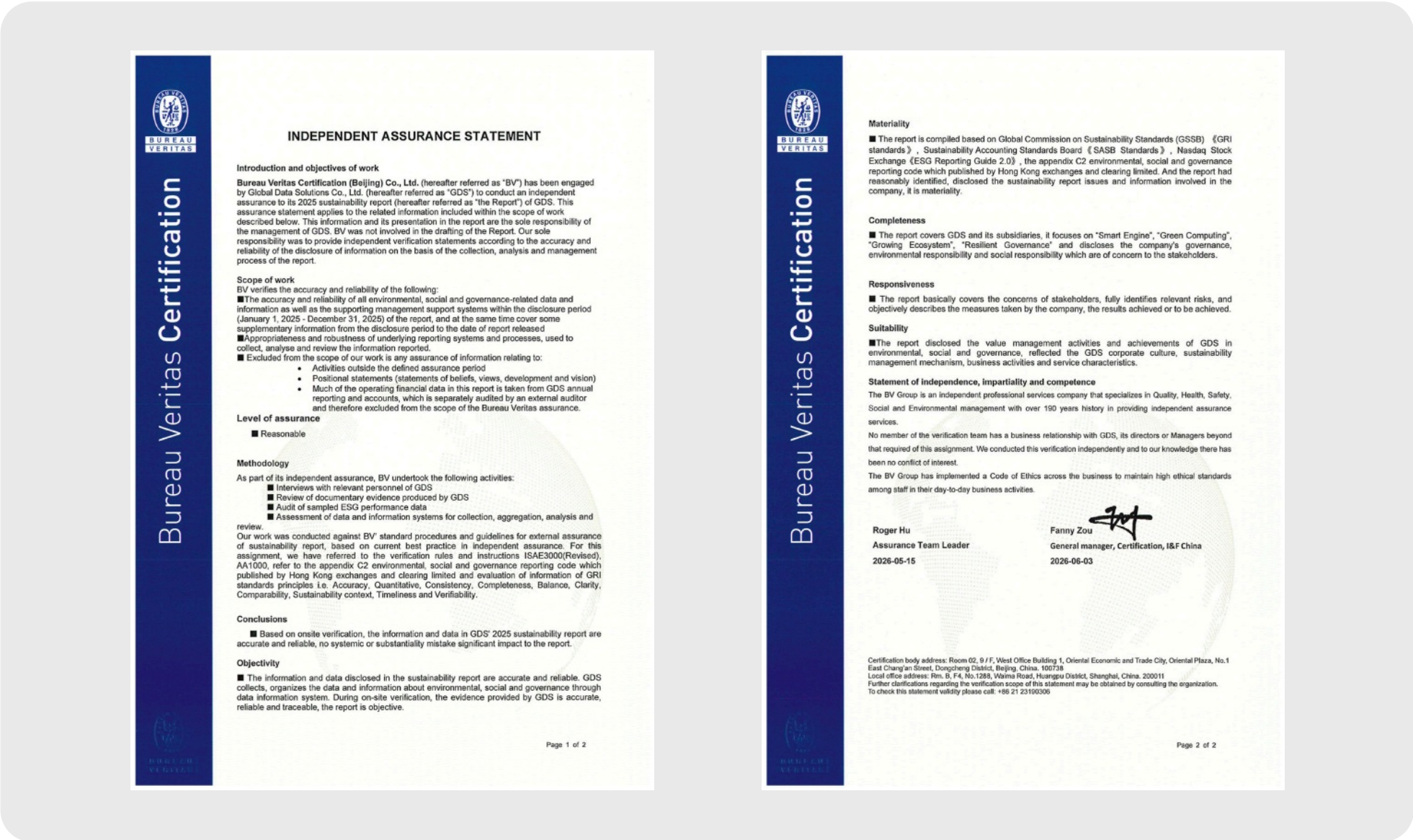
Disclosure			Sections in the Report
E1 Greenhouse Gas Emissions	E1.1	Total CO ₂ equivalent for Scope 1 GHG Emissions (if applicable)	Key Performance Indicators (KPI) Table
	E1.2	Total CO ₂ equivalent for Scope 2 GHG Emissions (if applicable)	Key Performance Indicators (KPI) Table
	E1.3	Total CO ₂ equivalent for Scope 3 GHG Emissions (if applicable)	Key Performance Indicators (KPI) Table
E2: Emission Intensity	E2.1	Total GHG emissions per output scale factor	Key Performance Indicators (KPI) Table
	E2.2	Total non-GHG emissions per unit of output	/
E3 Energy Usage	E3.1	Total amount of energy directly consumed	Key Performance Indicators (KPI) Table
	E3.2	Total amount of energy indirectly consumed	Key Performance Indicators (KPI) Table
E4 Energy Intensity	E4.1	Total direct energy usage per output scaling factor	Key Performance Indicators (KPI) Table
E5 Energy Mix	E5.1	Percentage: Energy usage by generation type	Key Performance Indicators (KPI) Table
E6 Water Usage	E6.1	Total water consumption	Key Performance Indicators (KPI) Table
	E6.2	Total amount of water reclaimed	/
E7 Environmental Operations	E7.1	Does your company follow a formal environmental policy? Yes/No	Climate Change and Energy Management
			Water Resource Management
			Circular Economy
	E7.2	Does your company follow specific waste, water, energy, and/or recycling policies? Yes/No	Climate Change and Energy Management
			Water Resource Management
			Waste Management
E8 Climate Oversight / Board	E7.3	Does your company use a recognized energy management system? Yes/No	Climate Change and Energy Management
			Water Resource Management
			Waste Management
E9 Climate Oversight / Management	E8.1	Does the Board of Directors oversee and/or manage climate-related risks? Yes/No	ESG Governance Framework
			Climate Change and Energy Management
E10 Climate Risk Exposure	E9.1	Does your Senior Management Team oversee and/or manage climate-related risks? Yes/No	ESG Governance Framework
			Climate Change and Energy Management
E11 Climate Risk Exposure	E10.1	Total amount invested, annually, in climate-related infrastructure, resilience, and product development	Climate Change and Energy Management
			Climate Change and Energy Management
S1 CEO Pay Ratio	S1.1	Ratio: CEO total compensation to median FTE total compensation	/
	S1.2	Does your company report this metric in regulatory filings?	/
S2 Gender Pay Ratio	S2.1	Ratio: Median male compensation to median female compensation	Key Performance Indicators (KPI) Table

Disclosure			Sections in the Report					
S3 Employee Turnover	S3.1	Percentage: Year-over-year change for full-time employees	Key Performance Indicators (KPI) Table					
	S3.2	Percentage: Year-over-year change in part-time employee turnover rate	/					
	S3.3	Percentage: Year-over-year change for contractors and/or consultants	/					
S4 Gender Diversity	S4.1	Total enterprise headcount held by men and women	Key Performance Indicators (KPI) Table					
	S4.2	Percentage: Entry- and mid-level positions held by men and women	Key Performance Indicators (KPI) Table					
	S4.3	Percentage: Senior- and executive-level positions held by men and women	Key Performance Indicators (KPI) Table					
S5 Temporary Worker Ratio	S5.1	Percentage: Total enterprise headcount held by part-time employees	/					
	S5.2	Percentage: Total enterprise headcount held by contractors and/or consultants	/					
S6 Non-discrimination	S6.1	Does your company follow a sexual harassment and/or non-discrimination policy?	Employee Engagement					
S7 Injury Rate	S7.1	Percentage: Frequency of injury events relative to total workforce time	Key Performance Indicators (KPI) Table					
S8 Global Health and Safety	S8.1	Does your company follow an occupational health and/or global health & safety policy?	Employee Health and Safety					
S9 Child & Forced Labor	S9.1	Does your company follow a child and/or forced labor policy?	Employee Engagement					
	S9.2	If yes, does your child and/or forced labor policy cover suppliers and vendors?	Value Chain Ecosystem Development					
S10 Human Rights	S10.1	Does your company follow a human rights policy?	Employee Engagement					
	S10.2	If yes, does your human rights policy cover suppliers and vendors?	Value Chain Ecosystem Development					
G1 Board Diversity	G1.1	Total board seats occupied by women (as compared to men)	Key Performance Indicators (KPI) Table					
	G1.2	Committee chairs occupied by women (as compared to men)	/					
G2 Board Independence	G2.1	Does company prohibit CEO from serving as board chair?	/					
	G2.2	Percentage: Total board seats occupied by independents	Key Performance Indicators (KPI) Table					
G3 Incentivized Pay	G3.1	Are executives formally incentivized to perform on sustainability?	ESG Governance					
G4 Collective Bargaining	G4.1	Percentage: Total enterprise headcount covered by collective bargaining agreement(s)	/					
G5 Supplier Code of Conduct	G5.1	Are your vendors or suppliers required to follow a code of conduct?	Value Chain Ecosystem Development					
	G5.2	If yes, what percentage of your suppliers have formally certified their compliance with the code?	Value Chain Ecosystem Development					
G6 Ethics & Anti-corruption	G6.1	Does your company follow an ethics and/or anti-corruption policy?	Anti-Corruption Compliance Culture Whistleblowing Mechanism					
	G6.2	If yes, what percentage of your workforce has formally certified its compliance with the policy?	Anti-Corruption Compliance Culture Whistleblowing Mechanism					
G7 Data Privacy	G7.1	Does your company follow a data privacy policy?	Data Security and Privacy Protection					
	G7.2	Has your company taken steps to comply with GDPR rules?	/					
G8 ESG Reporting	G8.1	Does your company publish a sustainability report?	About this Report					
	G8.2	Is sustainability data included in your regulatory filings?	/					
G9 Disclosure Practices	G9.1	Does the company provide sustainability data to sustainability reporting frameworks?	ESG Governance					
	G9.2	Does your company focus on specific UN Sustainable Development Goals (SDGs)?	Our Business Overview	Innovation	Green	Ecosystem	Governance	
	G9.3	Does your company set targets and report progress on the UN SDGs?	Our Business Overview	Innovation	Green	Ecosystem	Governance	
G10 External Assurance	G10.1	Are your sustainability disclosures assured or validated by a third party?	External Assurance					

SASB Standards Content Index

Topic	Disclosure	Metric	Section
Environmental Footprint of Hardware Infrastructure	TC-SI-130a.1	(1) Total energy consumption (2) Percentage grid electricity (3) Percentage renewable	Gigajoule (GJ) Percentage (%) Percentage (%) Key Performance Indicators (KPI) Table
	TC-SI-130a.2	In regions with High or Extremely High Baseline Water Stress: (1) Total Water withdrawn (2) Total water withdrawn and % in high/extremely high stress regions	Thousand cubic meters (m³) Percentage (%) Key Performance Indicators (KPI) Table
	TC-SI-130a.3	Discussion of the integration of environmental considerations into strategic planning for data center needs	/ Climate Change and Energy Management
Data Privacy & Freedom of Expression	TC-SI-220a.1	Description of policies and practices relating to behavioral advertising and user privacy	/ Data Security and Privacy Protection
	TC-SI-220a.2	Percentage of users whose information is used for secondary purposes	Number Key Performance Indicators (KPI) Table
	TC-SI-220a.3	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Currency Key Performance Indicators (KPI) Table
	TC-SI-220a.4	(1) Number of law enforcement requests for user information (2) Number of users whose information was requested (3) Percentage resulting in disclosure	Number Percentage (%) Key Performance Indicators (KPI) Table
	TC-SI-220a.5	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	n/a /
Data Security	TC-SI-230a.1	(1) Number of data breaches (2) Percentage involving personally identifiable information (3) Number of users affected	Number Percentage (%) Number Key Performance Indicators (KPI) Table
	TC-SI-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	/ Data Security and Privacy Protection
Hire and Manage a Global, Diverse, and Skilled Workforce	TC-SI-330a.1	Percentage of employees that are (1) foreign nationals (2) located offshore	Percentage (%) Key Performance Indicators (KPI) Table
	TC-SI-330a.2	Employee engagement as a percentage	Percentage (%) Employee Satisfaction Key Performance Indicators (KPI) Table
	TC-SI-330a.3	Percentage of gender and racial/ethnic group representation for (1) management (2) technical staff (3) all other employees	Percentage (%) Key Performance Indicators (KPI) Table
Intellectual Property Protection & Competitive Behavior	TC-SI-520a.1	Total compensation losses incurred due to legal proceedings related to anti-competitive behavior regulations	Currency During the reporting period, there were no relevant cases at GDS.
Managing Systemic Risks Arising from Technological Disruptions	TC-SI-550a.1	Number of (1) performance issues and (2) service disruptions (3) total customer downtime	time(s) During the reporting period, there were no relevant cases at GDS.
	TC-SI-550a.2	Description of business continuity risks related to disruptions of operations	/ Dual-Standard Security Operation Targets

Independent Assurance Report





Disclaimer

This report contains forward-looking statements within the meaning of Section 21E of the Securities Exchange Act of 1934, as amended, and as defined in the U.S. Private Securities Litigation Reform Act of 1995. These forward-looking statements can be identified by terminology such as "may," "will," "expect," "anticipate," "aim," "estimate," "intend," "plan," "believe," "potential," "continue," "is/are likely to" or other similar expressions. Such statements are based upon management's current expectations and current market and operating conditions, and relate to events that involve known or unknown risks, uncertainties and other factors, all of which are difficult to predict and many of which are beyond the Company's control, which may cause the Company's actual results, performance or achievements to differ materially from those in the forward-looking statements. Further information regarding these and other risks, uncertainties or factors is included in the Company's filings with the U.S. Securities and Exchange Commission. The Company does not undertake any obligation to update any forward-looking statement as a result of new information, future events or otherwise, except as required under law.

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