



Kyndryl, Inc.

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions

This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.

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(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored. 482

(13.3) Provide the following information for the person that has signed off (approved) your CDP response. 483

C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☒ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☒ USD

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:

☒ Publicly traded organization

(1.3.3) Description of organization

Kyndryl Holdings, Inc. (“we,” “Kyndryl” or the “Company”) is a leading technology services company and the largest IT infrastructure services provider in the world, serving thousands of enterprise customers and with operations in over 60 countries. We have a long track record of helping enterprises navigate major technological changes, particularly by enabling our customers to focus on the core aspects of their businesses during these shifts while trusting us with their most critical systems. Our purpose is to design, build and manage secure and responsive private, public and multi-cloud environments to serve our customers’ needs and accelerate their digital transformations. We provide engineering talent, operating solutions and insights derived from our knowledge and data around IT systems. This enables us to deliver advisory, implementation and managed services at scale across technology infrastructures that allow our customers to de-risk and realize the full value of their digital transformations. We do this while embracing new technologies and solutions and continually expanding our skills and capabilities, as we help advance the vital systems that power progress for our customers. We deliver technology services capabilities, insights and depth of expertise to modernize and manage IT environments based on our customers’ unique needs. We offer services across domains such as cloud services, core enterprise and zCloud services, applications, data and artificial intelligence (“AI”) services, digital workplace services, security and resiliency services and network and edge services as we continue to support our customers through technological change. Our services enable us to modernize and manage cloud and on-premises environments as “one” for our customers, enabling them to scale seamlessly. To deliver these services, we rely on our team of skilled practitioners, consisting of approximately 80,000 professionals. Since our large and diversified customer base operates in multiple industries and geographies, we utilize a flexible labor and delivery model with a balanced mix of global and

local talent as needed to meet customer-specific needs, regulatory requirements and data protection and labor laws. Our employees leverage their deep engineering expertise and extensive experience operating complex and heterogeneous technology environments to drive service quality, intellectual property development and our long-term trusted customer relationships. We have many customer relationships that are decades long, as we provide high-quality, mission-critical services that are core to operations with customers that represent the backbones of their respective industries. These customers entrust us to deliver the services they need and to manage their complex environments so that they can achieve their business objectives. We partner with a broad ecosystem, including a wide range of hyperscale cloud providers, system integrators, independent software vendors and technology vendors from startups to market leaders. This enables us to serve our customers with contemporary technology capabilities that best fit their needs and open new avenues for growth. This is all underpinned by our ability to integrate and operate mission-critical technology at scale using deep engineering expertise and intellectual property. At Kyndryl, our corporate citizenship strategy is aligned with our strategic business priorities and rooted in our commitment to powering economic, social, and environmental progress. In our second fiscal year, we continued to strive for a more sustainable future, delivering value to our stakeholders and evolving our strategy to expand our global impact and accelerate business success. We work every day to foster a winning culture rooted in environmental stewardship, social inclusivity, and ethical governance practices. We are focused on profitability, managing our risks and reputation, and developing our employee, customer, and partner capabilities. Fiscal 2025 corporate citizenship achievements - Environment • Reduced our scope 1, 2 (market-based) and 3 greenhouse gas emissions by 18%, compared to our fiscal 2023 base year, in support of our Science Based Targets initiative-validated 2040 net-zero and 2030 near-term emission reduction targets • Obtained global ISO 14001 and 50001 certifications for our Environmental and Energy Management System, which helps us operationalize our environmental goals • Educated more than 40,000 of our employees with our Kyndryl sustainability training course — Mission Net-Zero — since its launch • Delivered sustainability services for our customers related to decarbonization and transformation; recognized by Information Services Group as a leader in Sustainability and ESG: IT Solutions and Services • Continued to progressively apply the Responsible Business Alliance Code of Conduct to our suppliers and educated our supplier network about our net-zero goals

[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

03/31/2025

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:

☒ Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:

☒ Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:

☒ 2 years

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:

☒ 2 years

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:

☒ 2 years

[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

15057000000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: ☒ Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

US50155Q1004

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

50155Q 100

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

KD

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

- ☒ Peru
- ☒ Chile
- ☒ China
- ☒ Egypt
- ☒ India
- ☒ Cyprus
- ☒ France
- ☒ Greece
- ☒ Israel
- ☒ Latvia
- ☒ Austria
- ☒ Belgium
- ☒ Croatia
- ☒ Czechia
- ☒ Denmark
- ☒ Ireland
- ☒ Romania
- ☒ Ukraine
- ☒ Uruguay
- ☒ Bulgaria
- ☒ Slovenia
- ☒ Thailand
- ☒ Viet Nam
- ☒ Argentina
- ☒ Australia
- ☒ Netherlands
- ☒ New Zealand
- ☒ Philippines
- ☒ Switzerland

- ☒ Italy
- ☒ Japan
- ☒ Spain
- ☒ Brazil
- ☒ Canada
- ☒ Mexico
- ☒ Norway
- ☒ Poland
- ☒ Sweden
- ☒ Turkey
- ☒ Ecuador
- ☒ Estonia
- ☒ Finland
- ☒ Germany
- ☒ Hungary
- ☒ Colombia
- ☒ Malaysia
- ☒ Pakistan
- ☒ Portugal
- ☒ Slovakia
- ☒ Indonesia
- ☒ Lithuania
- ☒ Singapore
- ☒ Costa Rica
- ☒ Luxembourg
- ☒ South Africa
- ☒ New Caledonia
- ☒ Taiwan, China
- ☒ Republic of Korea

- ☒ Saudi Arabia
- ☒ United Arab Emirates
- ☒ United States of America
- ☒ Venezuela (Bolivarian Republic of)
- ☒ China, Macao Special Administrative Region
- ☒ United Kingdom of Great Britain and Northern Ireland
- ☒ Hong Kong SAR, China

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

- ☒ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

- ☒ Upstream value chain
- ☒ Downstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

- ☒ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

- ☒ Tier 2 suppliers

(1.24.7) Description of mapping process and coverage

Kyndryl has identified our top-tier suppliers through a spend-based methodology and emissions-based approach as well. For FY25, Kyndryl's top-tier suppliers (200) contribute to nearly 75% of Cat 1 & 2 related emissions. We currently use the Ecovadis platform (see <https://ecovadis.com/enterprise/>), CDP Platform, and Supplier

IO platforms to map our selected top-tier suppliers and their ESG performance. In fiscal 2025, we launched a global education campaign on advancing climate action for over 7,500 of our suppliers. Through our CDP Supply Chain program, we aim to understand suppliers' carbon reduction programs and utilize CDP's platform to accurately estimate supply chain emissions from our top-tier suppliers and appropriately target our supply chain emission reduction programs. See the 'Responsible Supply Chain' section of our latest Corporate Citizenship Report <https://www.kyndryl.com/content/dam/kyndrylprogram/doc/en/2025/2025-corporate-citizenship-report.pdf>

[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

(1.24.1.1) Plastics mapping

Select from:

☒ No, but we plan to within the next two years

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

☒ Not an immediate strategic priority

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

Kyndryl does not use significant plastic products in our Operations, hence this is not our current strategic priority. However, we will be considering mapping in the future. Whenever and wherever possible, Kyndryl focuses on addressing global plastic-related issues. Finding innovative solutions to tackle plastic pollution was the driving force behind Kyndryl's collaboration with REVA University in India for the Plastics-Free Rivers Hackathon, conducted in 2023. Participants were challenged with detecting, classifying and segmenting plastics from a given dataset based on the Saigon River, and then proposing an AI solution to reduce pollution. Kyndryl volunteers provided expertise, resources and mentorship to participants, while encouraging them to think creatively. Over 720 teams participated, including some from REVA University and Kyndryl.

[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

1

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Our short-term horizon includes quick and easy-to-implement opportunities for addressing potential risks. One key strategy is to reduce our data center energy consumption by implementing short-term energy efficiency projects across Kyndryl operations. As we continue to implement the asset-light strategy (data center consolidation and transformation), we will reduce GHG emissions related to facilities and transition from low to high-energy-efficient data centers.

Medium-term

(2.1.1) From (years)

1

(2.1.3) To (years)

5

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Our medium-term horizon is the next five years, which will help us achieve our near-term 2030 goal. By 2030, Kyndryl's strategy is to obtain 100% of purchased electricity from renewable sources. By 2030, we also aim to reduce our overall GHG emissions by 50%.

Long-term

(2.1.1) From (years)

5

(2.1.2) Is your long-term time horizon open ended?

Select from:

☒ Yes

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Our long-term horizon will ultimately help us to achieve our net-zero goal. A few strategies that we have either adopted already or are planning to adopt are decarbonization of the supply chain, business travel, and employee commute-related emissions.
[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: ☒ Yes	Select from: ☒ Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: ☒ Yes	Select from: ☒ Both risks and opportunities	Select from: ☒ Yes

[Fixed row]

(2.2.2) Provide details of your organization’s process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply
☒ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply
☒ Dependencies
☒ Impacts
☒ Risks
☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

- ☒ Direct operations
- ☒ Upstream value chain
- ☒ End of life management

(2.2.2.4) Coverage

Select from:

- ☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

- ☒ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- ☒ Annually

(2.2.2.9) Time horizons covered

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

(2.2.2.10) Integration of risk management process

Select from:

- ☒ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

- ☒ Site-specific
- ☒ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

- ☒ Other commercially/publicly available tools, please specify :Climate Risk Assessment Third Party Platform for the Task Force for Climate-Related Financial Disclosures study

Enterprise Risk Management

- ☒ Enterprise Risk Management
- ☒ Risk models

International methodologies and standards

- ☒ Environmental Impact Assessment
- ☒ IPCC Climate Change Projections
- ☒ ISO 14001 Environmental Management Standard
- ☒ Life Cycle Assessment

Other

- ☒ Desk-based research
- ☒ External consultants
- ☒ Materiality assessment
- ☒ Partner and stakeholder consultation/analysis
- ☒ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

- ☒ Drought
- ☒ Tornado
- ☒ Landslide
- ☒ Wildfires
- ☒ Heat waves
- ☒ Cyclones, hurricanes, typhoons
- ☒ Heavy precipitation (rain, hail, snow/ice)
- ☒ Flood (coastal, fluvial, pluvial, ground water)
- ☒ Storm (including blizzards, dust, and sandstorms)

Chronic physical

- ☒ Heat stress
- ☒ Water stress
- ☒ Sea level rise
- ☒ Coastal erosion
- ☒ Temperature variability
- ☒ Increased severity of extreme weather events
- ☒ Changing temperature (air, freshwater, marine water)
- ☒ Changing precipitation patterns and types (rain, hail, snow/ice)

Policy

- ☒ Carbon pricing mechanisms
- ☒ Changes to international law and bilateral agreements
- ☒ Changes to national legislation

Market

- ☒ Availability and/or increased cost of certified sustainable material
- ☒ Changing customer behavior

Reputation

- ☒ Increased partner and stakeholder concern and partner and stakeholder negative feedback

Technology

- ☒ Dependency on water-intensive energy sources

Liability

- ☒ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- ☒ Customers
- ☒ Employees
- ☒ Investors
- ☒ Regulators
- ☒ Suppliers

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

- ☒ No

(2.2.2.16) Further details of process

Kyndryl is focused on assessing the impacts of environment and climate-related material risks, implementing key strategic planning and risk management initiatives to mitigate our impacts, and leveraging new opportunities to offer sustainability-related software products and services to markets in which we operate. In FY2025, Kyndryl completed a detailed double-material assessment (DMA), aligned with the EU's ESRS guidance, to identify material issues as well as dependencies. As noted in our 2025 TCFD Report, in July 2024, we updated our physical climate risk modeling and analysis to reflect evolving climate-related risks and maintain alignment with our strategy and business developments. Building on our 2023 inaugural scenario analysis of 70 portfolio sites, the updated assessment expanded to 91 Kyndryl data centers and offices, using the same methodology. The expanded geographic and operational boundary enhances our ability to prioritize risks, meet regulatory requirements and strengthen climate resilience. Due to no significant change to our site portfolio in fiscal 2025, no updates were made to our 2024 results. To develop mitigation and adaptation strategies for material climate-related risks and opportunities, Kyndryl applies predictive climate models, scenario analysis and structured methodologies that identify and assess both physical and transition risks. Physical risks — classified as acute and chronic — are evaluated alongside transition risks, which include policy and regulatory changes, market dynamics, and reputational pressures. We also leverage a third-party proprietary platform that translates climate model outputs into qualitative risk insights. This platform integrates: - Modeled exposure of different acute and chronic climate hazards by geographic location - Detailed site-specific characteristics - Customizable vulnerability weightings for each hazard The platform generates asset-specific risk exposure rating scores and insights that help identify and highlight top and emerging physical climate hazards and exposure at a specific location, accounting for both climate data and site type (e.g., data center vs. office). To assess these risks, Kyndryl undertook scenario analysis, using inputs and assumptions about hypothetical future economic and energy systems from the International Energy Agency (IEA). In keeping with TCFD recommendations, Kyndryl used 3 scenarios - from low emissions SSP1-2.6 to middle of the road SSP3-7.0 to high-emissions SSP5-8.5. In addition, Kyndryl also two scenarios, including one at or above 2 degrees Celsius, the

Stated Policies Scenario (STEPS- WEO 2023), and another projected to keep the world under 2 degrees Celsius of warming, the more ambitious Net Zero by 2050 scenario (NZE2050- WEO 2023). Using these energy system scenarios, we identified potential policy, regulatory, market and reputational impacts across our business and operations. To inform our analysis of these transition risks and provide a comprehensive assessment of their potential impacts on our business and operational performance, we ranked potential financial impacts for the business across Kyndryl's short (0-1 yr)-, medium (1-5 yrs)-, and long-term (5 yrs) horizons. See our latest TCFD 2025 report for more details. <https://www.kyndryl.com/content/dam/kyndrylprogram/doc/en/2025/fiscal-2025-tcfd-report.pdf>
 [Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:

☒ Yes

(2.2.7.2) Description of how interconnections are assessed

Material ESG issues, including climate change and its associated risks, are identified and assessed through a double materiality assessment (DMA), process that aligns with ESRS recommendations. In 2025, we integrated the results of the DMA — including climate-related risks — into our Environmental and Energy Management System (E&EnMS), Enterprise Risk Management (ERM) framework and internal Management Self-Assessment of Controls process (MSAC). This integration helps to appropriately prioritize and address climate-related risks across the organization. Our global E&EnMS, certified to ISO 14001 and ISO 50001 standards, is designed to enable Kyndryl to continuously identify and assess environmental impacts related to material climate-related risks, including those associated with energy use. As part of the E&EnMS process, Kyndryl teams collaborates cross-functionally — including Real Estate and Data Center Services (RDC), Procurement, Asset Management and GCS — to conduct detailed assessments of environmental and energy aspects of our operations. These assessments focus on activities that interact with climate-related factors such as greenhouse gas (GHG) emissions, energy consumption, and water use. We apply a standardized methodology to evaluate these aspects, incorporating inherent and residual risk scoring and assessments of control effectiveness. Aspects with high inherent risk scores are designated as Significant Environmental Aspects (SEAs) and prioritized for mitigation. To enhance climate-related resilience for customers with high availability data demands, Kyndryl mirrors data across geographically diverse delivery centers to help ensure reliable access to critical information during climate-related disruptions. Customer resilience efforts reinforce our focus on mitigating climate-related operational risks and ensuring business continuity. Our enterprise-wide business continuity program, integrated in the E&EnMS, seeks to support climate-related risk management by offering resilient IT infrastructure and uninterrupted service delivery. The continuity program is subject to regular audits and testing. Together our data center and continuity programs provide coordinated climate-related risk management through operational controls, governance structures and performance monitoring that help identify, mitigate and integrate risks into Kyndryl's broader business and corporate citizenship strategies. Informed by our climate-related risk assessment, we continue to explore opportunities to strengthen our climate-related risks management and response planning.

[Fixed row]

(2.3) Have you identified priority locations across your value chain?

(2.3.1) Identification of priority locations

Select from:

☒ Yes, we have identified priority locations

(2.3.2) Value chain stages where priority locations have been identified

Select all that apply

☒ Direct operations

☒ Upstream value chain

(2.3.3) Types of priority locations identified

Sensitive locations

☒ Areas important for biodiversity

☒ Areas of limited water availability, flooding, and/or poor quality of water

Locations with substantive dependencies, impacts, risks, and/or opportunities

☒ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to water

(2.3.4) Description of process to identify priority locations

Kyndryl has used the IBAT tool to identify impacts to biodiversity within 5 km of our operating facilities, which include data centers and offices. Details are included in the biodiversity section of this CDP questionnaire. Kyndryl also used the WRI tool to identify areas of high water stress where we have our facilities (data centers and offices). Kyndryl focuses on our key suppliers' business continuity plan due to nature related disruptions through questionnaires and audits

(2.3.5) Will you be disclosing a list/spatial map of priority locations?

Select from:

☒ No, we have a list/geospatial map of priority locations, but we will not be disclosing it

[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

☒ Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

☒ Frequency of effect occurring

☒ Time horizon over which the effect occurs

☒ Likelihood of effect occurring

(2.4.7) Application of definition

When identifying and assessing the risks, Kyndryl considers two factors - 'Measurement of Probability' and 'Measurement of Impact'. Kyndryl also considers how effectively we manage the risks. Our process is to assess the probability and impact for each risk, taking into consideration inherent risk (risk level existing before risk mitigation) and residual risk (risk level remaining after risk mitigation), and select a rating for both probability and impact based on our metrics ratings table. The SVP of GCS, who leads a cross-functional 'Corporate Citizenship Executive Committee', is responsible for the execution and advancement of climate and sustainability-related initiatives and management of climate-related risks. The GCS team evaluates and prioritizes environmental and climate-related risks for inclusion into the GCS-maintained Environmental and Energy Management System (E&EnMS) program and the corporate Enterprise Risk Management (ERM) program.

Opportunities

(2.4.1) Type of definition

Select all that apply

☒ Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

☒ Frequency of effect occurring

☒ Time horizon over which the effect occurs

☒ Likelihood of effect occurring

(2.4.7) Application of definition

For all the risks assessed as per the above definition, opportunities are considered for each risk.
[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☒ Yes, both in direct operations and upstream/downstream value chain

Plastics

(3.1.1) Environmental risks identified

Select from:

☒ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Not an immediate strategic priority

(3.1.3) Please explain

Kyndryl does not manufacture any product, and our primary operation is providing mission-critical enterprise technology services. Any environmental risks due to plastics in our operations or our supply chain either do not exist or are minimal, and this was not identified during our Double Materiality Analysis (DMA) process. Hence, this is not considered an immediate priority at this time.

[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☒ Other policy risk, please specify :Energy efficiency requirements, upcoming stringent ESG requirements, and regulations specifically related to data centers. In addition, increased regulation for data center energy procurement strategies. The time frame is Medium (1 to 5 years)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ Spain

☒ Canada

☒ France

☒ Norway

☒ Poland

☒ Australia

☒ Luxembourg

☒ Netherlands

☒ Sweden

☒ Belgium

☒ Denmark

☒ Germany

☒ Portugal

☒ United Kingdom of Great Britain and Northern Ireland

- ☒ Switzerland
- ☒ United States of America

(3.1.1.9) Organization-specific description of risk

Kyndryl has identified this as a risk with existing and potential future impacts. As we have physical assets such as datacenters and office buildings, current applicable regulations related to energy efficiency standards, especially in Europe, for buildings and data centers, and any current or upcoming applicable environmental regulations that impact climate-related risks are considered. Kyndryl operates in 60 countries, so regulations such as CSRD in Europe, California Climate and Emissions disclosure in the US, ISSB IFRS S2 climate-related regulations in Australia and other jurisdictions, the German Supply Chain Act, etc., have implications for our operations. Kyndryl proactively works with our global policy department to understand the implications of upcoming regulations and works with operations and the supply chain to prepare management and mitigation efforts, strategies and policies as required.

(3.1.1.11) Primary financial effect of the risk

Select from:

- ☒ Increased compliance costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

- ☒ Very likely

(3.1.1.14) Magnitude

Select from:

- ☒ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The identified risk is not expected to significantly impact Kyndryl's financial health or cash flow. However, due to the evolving nature of regulatory requirements, we have engaged Kyndryl Finance to help assess the potential future need for capital expenditures (CapEx) or operating expenses (OpEx).

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ No

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☒ Greater compliance with regulatory requirements

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

Kyndryl is in the process of evaluating and financially quantifying this risk, and Kyndryl has plans to disclose the financial effect figure in the near future (short-term). For the purpose of this questionnaire, we have currently entered the value "zero".

(3.1.1.29) Description of response

At Kyndryl, we are increasing energy efficiency at the locations we operate through IT equipment modernization and refreshing, as well as consolidation and virtualization of IT workloads. We are also implementing cooling and airflow efficiency projects through AI and automation. Additionally, as part of our commitment to both utilizing current technology and reducing our carbon footprint, we have worked to retire, consolidate, and replace older, energy-intensive mainframes with newer, more energy-efficient technology in our datacenters. Efficiency and modernization efforts help us meet our environmental goals while improving the infrastructure environments for our customers. Kyndryl has established one of the largest datacenter portfolios accepted into the EU Code of Conduct for Energy Efficiency in Data Centers (EU CoC). This voluntary initiative launched in 2008 with the goal of improving datacenter energy efficiency as the sector's energy consumption grows. The guidelines outlined in the EU CoC form the basis of the regulatory requirements of the EU's Energy Efficiency Directive. Kyndryl's portfolio—spanning the EU and beyond—highlights our commitment to energy efficiency.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Market

☒ Other market risk, please specify :Increased cost of procuring renewable energy in local markets. Reduced market availability of renewable energy in Kyndryl's areas of operation.

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

- | | |
|--|---|
| ☒ Japan | ☒ Israel |
| ☒ Spain | ☒ Norway |
| ☒ Brazil | ☒ Poland |
| ☒ Canada | ☒ Sweden |
| ☒ France | ☒ Belgium |
| ☒ Croatia | ☒ Bulgaria |
| ☒ Denmark | ☒ Portugal |
| ☒ Finland | ☒ Australia |
| ☒ Germany | ☒ Costa Rica |
| ☒ Ireland | ☒ Netherlands |
| ☒ Switzerland | |
| ☒ United States of America | |
| ☒ United Kingdom of Great Britain and Northern Ireland | |

(3.1.1.9) Organization-specific description of risk

As Kyndryl aims to achieve 100% of its purchased electricity through renewable sources by 2030 and has committed to continue using renewable energy beyond 2030, we have identified potential future risks related to the stability of market-based renewable energy procurement costs and the availability of renewable energy in local markets.

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Medium-term

☒ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ Likely

(3.1.1.14) Magnitude

Select from:

☒ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

This risk has a minimal effect on indirect operational costs in order for Kyndryl to obtain related to procuring 100% of our purchased electricity by 2030 and from renewable energy sources— procurement as part of the long-term net-zero strategy. This Consideration of this risk also allows Kyndryl to evaluate opportunities for Kyndryl to consider long-term VPPA options that help us achieve goals.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ No

(3.1.1.26) Primary response to risk

Engagement

☒ Other engagement, please specify :Work with our co-location and service providers to include renewable energy purchases as part of the contract through bundled energy purchases. Consider long term VPPA options

(3.1.1.27) Cost of response to risk

4400000

(3.1.1.28) Explanation of cost calculation

Kyndryl has estimated the financial effect of the requirements to meet our 100% Renewable energy goal by 2030. We have estimated the amount of renewable energy (bundled and unbundled) required for each year and the associated cost. The cost disclosed here is the expected cost (response) for unbundled renewable energy in the year 2030 if we implement our climate action plan. We have also identified opportunities to minimize the risks.

(3.1.1.29) Description of response

Improve and develop a renewable procurement strategy to assess the future availability and accessibility of renewable energy in areas of operations, both operated and serviced sites.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Reputation

☒ Other reputation risk, please specify :Increased stakeholder pressures due to perceptions of Kyndryl's climate resiliency and overall sustainability impacts.

(3.1.1.4) Value chain stage where the risk occurs

Select from:

- ☒ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

- | | |
|---|--|
| ☒ India | ☒ Canada |
| ☒ Italy | ☒ France |
| ☒ Japan | ☒ Israel |
| ☒ Spain | ☒ Mexico |
| ☒ Brazil | ☒ Norway |
| ☒ Poland | ☒ Finland |
| ☒ Sweden | ☒ Germany |
| ☒ Austria | ☒ Ireland |
| ☒ Belgium | ☒ Bulgaria |
| ☒ Denmark | ☒ Portugal |
| ☒ Australia | ☒ Switzerland |
| ☒ Costa Rica | ☒ South Africa |
| ☒ Luxembourg | ☒ United States of America |
| ☒ Netherlands | |
| ☒ Philippines | |

(3.1.1.9) Organization-specific description of risk

Kyndryl has identified this as a potential future risk. Because of increased global ESG requirements, there is a risk of increased stakeholder transparency expectations from employees, investors, suppliers, customers, and partners.

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Medium-term

☒ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ Very likely

(3.1.1.14) Magnitude

Select from:

☒ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

This risk has a minimal effect on the financial position or cash flow and is anticipated to slightly increase the indirect OpEx expenditures operation costs related to Kyndryl's investment in resources and effective stakeholder engagement strategies.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ No

(3.1.1.26) Primary response to risk

Engagement

☒ Engage in multi-stakeholder initiatives

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

Kyndryl is in the process of evaluating and financially quantifying this risk and has plans to disclose in the future (short-term). For the purpose of this questionnaire, we have currently entered the value "zero".

(3.1.1.29) Description of response

Through various disclosure and engagement processes, Kyndryl is keeping our stakeholders updated on our efforts towards ESG improvement. Within three years of formation, Kyndryl has obtained validation of our net-zero science-based targets from SBTi, which indicates our drive towards our commitment. Visit our Non-Financial ESG Disclosure Hub to view Kyndryl's ESG disclosures.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☒ Other acute physical risk, please specify :Combining all assessed acute physical risks into one that includes • River Flooding • Extreme Rainfall
Flooding • Coastal Flooding • Tropical Cyclones • Wildfire Weather • Rainfall Induced Landslides

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

- | | |
|--|--|
| ☒ India | ☒ France |
| ☒ Italy | ☒ Israel |
| ☒ Japan | ☒ Mexico |
| ☒ Brazil | ☒ Costa Rica |
| ☒ Canada | ☒ United Arab Emirates |
| ☒ United States of America | |

(3.1.1.9) Organization-specific description of risk

Kyndryl has identified this as a potential future risk. Kyndryl categorizes physical risks into acute and chronic categories to better understand their impact on our operations. Eighty-five out of 91 sites assessed fall into a minimal/low-to-moderate risk category under current and future climate conditions. However, 6 and 10 sites under current (2024) and future (2050) climate conditions, respectively, are classified as substantial risk, particularly due to vulnerabilities related to flooding and water stress. For the sites classified as substantial risk locations, significant climate-related events could result in major impacts on property, personnel safety and regulatory compliance, necessitating targeted mitigation efforts to address these vulnerabilities. See our 2025 TCFD Report for complete details and information on our approach to Climate-related physical risk identification and management.

(3.1.1.11) Primary financial effect of the risk

Select from:

- ☒ Disruption to workforce management and planning

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Short-term
☒ Medium-term
☒ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

- ☒ More likely than not

(3.1.1.14) Magnitude

Select from:

☒ Medium-high

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Identified acute risks are not expected to significantly impact Kyndryl's financial health or cash flow. Kyndryl's data center strategy incorporates resilience to help mitigate disruption to operations. Potential unavoidable, acute, climate-related operational disruptions include commute complications related to heavy precipitation, flooding, and heat waves. To mitigate impacts, Kyndryl's operational resiliency includes the use of a workforce from non-affected regions for continuous client support during disruptions.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ No

(3.1.1.26) Primary response to risk

Policies and plans

☒ Develop a climate transition plan

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

Kyndryl is in the process of evaluating and financially quantifying this risk and has plans to disclose in the future (short-term). For the purpose of this questionnaire, we have currently entered the value "zero".

(3.1.1.29) Description of response

Kyndryl has established resiliency in our data centers to help avoid business disruption resulting from climate change-related disasters. A key focus area for Kyndryl is improving the operational resilience of data centers 24 x 7.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk5

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☒ Other chronic physical risk, please specify :Combining all chronic physical risks that might affect Kyndryl - • Extreme heat •Extreme cold •Water stress

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ India

☒ Japan

☒ Spain

☒ Brazil

☒ Canada

☒ Costa Rica

☒ United States of America

☒ United Kingdom of Great Britain and Northern Ireland

☒ France

☒ Israel

☒ Mexico

☒ Belgium

☒ Australia

(3.1.1.9) Organization-specific description of risk

Kyndryl has identified this as a potential future risk. Kyndryl has identified this risk that might have significant effects in the future. Kyndryl categorizes physical risks into acute and chronic categories to better understand their impact on our operations. Eighty-five out of 91 sites assessed fall into a minimal/low-to-moderate risk category under current and future climate conditions. However, 6 and 10 sites under current (2024) and future (2050) climate conditions, respectively, are classified as substantial risk, particularly due to vulnerabilities related to flooding and water stress. For the sites classified as substantial risk locations, significant climate-related events could result in major impacts on property, personnel safety and regulatory compliance, necessitating targeted mitigation efforts to address these vulnerabilities. See our 2025 TCFD Report for complete details and information on our approach to Climate-related physical risk identification and management.

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Disruption to workforce management and planning

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Medium-term

☒ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ More likely than not

(3.1.1.14) Magnitude

Select from:

☒ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The identified chronic risks are not expected to significantly impact Kyndryl's financial health or cash flow. Kyndryl includes operational resiliencies at all data center locations to help mitigate the threat of potential disruption, but depending on the severity of the impact, operations could be temporarily disrupted. To help further mitigate impacts, Kyndryl's operational resiliency includes the use of workforce from non-affected regions for continuous client support during climate-related disruptions impacting a particular geography/site portfolio.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ No

(3.1.1.26) Primary response to risk

Policies and plans

☒ Develop a climate transition plan

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

Kyndryl is in the process of evaluating and financially quantifying this risk and has plans to disclose in the future (short-term). For the purpose of this questionnaire, we have currently entered the value "zero".

(3.1.1.29) Description of response

Kyndryl has established resiliency in our data centers to help avoid business disruptions resulting from climate change-related disasters. A key focus area for Kyndryl is improving the operational resilience of data centers 24 x 7. To help further mitigate impacts, Kyndryl's operational resiliency includes the use of workforce from non-affected regions for continuous client support during climate-related disruptions impacting a particular geography/site portfolio.

[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

☒ Revenue

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☒ Less than 1%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

15000000

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ Less than 1%

(3.1.2.7) Explanation of financial figures

Kyndryl has built the required redundancies in our datacenters to limit disruption of business due to any climate change-related disasters. Kyndryl is also proactively working to address any transitional risks, such as regulations or market changes. Based on the approximate estimation, 0.1% of our total revenue (disruption loss to business, implementation cost, etc) might be vulnerable due to climate and nature-related disasters, including earthquakes. Kyndryl is currently not estimating an absolute value of our total revenue vulnerable due to transitional risks, but we have plans to do this in the future. Hence, this is entered as 'zero' for the purpose of submitting the questionnaire

[Add row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:

☒ No, and we do not anticipate being regulated in the next three years

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

	Environmental opportunities identified
Climate change	Select from: ☒ Yes, we have identified opportunities, and some/all are being realized

[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☒ Use of renewable energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

- ☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- | | |
|--|--|
| ☒ Canada | ☒ Sweden |
| ☒ France | ☒ Belgium |
| ☒ Mexico | ☒ Denmark |
| ☒ Norway | ☒ Finland |
| ☒ Poland | ☒ Germany |
| ☒ Ireland | ☒ Netherlands |
| ☒ Uruguay | ☒ Switzerland |
| ☒ Portugal | ☒ United States of America |
| ☒ Costa Rica | ☒ United Kingdom of Great Britain and Northern Ireland |
| ☒ Luxembourg | |

(3.6.1.8) Organization specific description

Continue improving and innovating the renewable procurement strategy to assess future availability and accessibility of renewable energy in areas of operations.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Other, please specify :No specific financial effect, rather this will accelerate Kyndryl towards its near-term goal

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

☒ Medium-low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The opportunity will result in negligible effect on the financial position, performance or cash flow.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

Kyndryl is currently evaluating the cost to realize the opportunity; however, it is not in a position to disclose. But we will disclose in the near future. For the purpose of this questionnaire, we have currently entered the value "zero".

(3.6.1.26) Strategy to realize opportunity

Working with Operations, Procurement, and Finance to secure renewable energy through bundled contracts and buying EACs at cheaper prices when the market prices fluctuate. Kyndryl is also evaluating VPPA options that can provide renewable energy in the future at fixed price which can significantly avoid the risks and provide more opportunities

Climate change

(3.6.1.1) Opportunity identifier

Select from:

- ☒ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

- ☒ Use of renewable energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

- ☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- | | |
|--|--|
| ☒ India | ☒ Norway |
| ☒ Spain | ☒ Poland |
| ☒ Canada | ☒ Sweden |
| ☒ France | ☒ Belgium |
| ☒ Israel | ☒ Denmark |
| ☒ Finland | ☒ Switzerland |
| ☒ Germany | ☒ United States of America |
| ☒ Iceland | ☒ United Kingdom of Great Britain and Northern Ireland |
| ☒ Portugal | |
| ☒ Costa Rica | |

(3.6.1.8) Organization specific description

- *Enable generation of renewable energy annually to help Kyndryl source 100% of energy requirements from renewable energy sources by 2030.*

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☒ Medium-term

☒ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

☒ Medium-low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The opportunity will result in negligible effect on the financial position, performance or cash flow.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

Kyndryl is currently evaluating the cost to realize the opportunity; however, it is not in a position to disclose. But we will disclose in the near future. For the purpose of this questionnaire, we have currently entered the value "zero".

(3.6.1.26) Strategy to realize opportunity

Working with co-location and service providers who have on-site renewable energy generation. Installing on-site renewable energy generation in owned data centers and offices.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☒ Other energy source opportunity, please specify :Energy Management and Efficiency Improvements

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ India

☒ Italy

☒ Japan

☒ Spain

☒ France

☒ Israel

☒ Norway

☒ Poland

- ☒ Canada
- ☒ Austria
- ☒ Belgium
- ☒ Germany
- ☒ Iceland
- ☒ Ireland
- ☒ United Kingdom of Great Britain and Northern Ireland

- ☒ Sweden
- ☒ Portugal
- ☒ Australia
- ☒ Luxembourg
- ☒ Switzerland
- ☒ United States of America

(3.6.1.8) Organization specific description

- *Maintain an Environmental and Energy Management System certification in compliance with ISO 14001 and 50001*

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Medium-term
- ☒ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

- ☒ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

- ☒ Medium-low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The opportunity will result in negligible effect on the financial position, performance or cash flow.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

Kyndryl is currently evaluating the cost to realize the opportunity; however, it is not in a position to disclose. But we will disclose in the near future. For the purpose of this questionnaire, we have currently entered the value "zero".

(3.6.1.26) Strategy to realize opportunity

Kyndryl has implemented ISO 14001 EMS and ISO 50001. Kyndryl's aim is to reduce exposure to energy efficiency reporting requirements and enable decreased cost of compliance.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp4

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☒ Other energy source opportunity, please specify :Energy Management and Efficiency Improvements

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

- ☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- | | |
|--|--|
| ☒ Italy | ☒ Israel |
| ☒ Japan | ☒ Norway |
| ☒ Spain | ☒ Poland |
| ☒ Canada | ☒ Sweden |
| ☒ France | ☒ Belgium |
| ☒ Denmark | ☒ Portugal |
| ☒ Finland | ☒ Argentina |
| ☒ Germany | ☒ Australia |
| ☒ Iceland | ☒ Costa Rica |
| ☒ Ireland | ☒ Luxembourg |
| ☒ Switzerland | |
| ☒ United States of America | |
| ☒ United Kingdom of Great Britain and Northern Ireland | |

(3.6.1.8) Organization specific description

- *Reduce our data center energy consumption by implementing energy efficiency program across Kyndryl operations*

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

- ☒ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

- ☒ Medium-low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The opportunity will result in marginal savings of the operating cost at the facility where energy efficiency projects are implemented.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

- ☒ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

Kyndryl is currently evaluating the cost to realize the opportunity; however, it is not in a position to disclose. But we will disclose in the near future. For the purpose of this questionnaire, we have currently entered the value "zero".

(3.6.1.26) Strategy to realize opportunity

Working with our facility management companies to identify energy efficiency projects and implementing through OPEX/CAPEX options.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp5

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☒ Other products and services opportunity, please specify :Expansion of Sustainability linked Services to our customers

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Downstream value chain

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Chile

☒ China

☒ India

☒ Italy

☒ Japan

☒ Greece

☒ Israel

☒ Mexico

☒ Qatar

☒ Spain

☒ Brazil

☒ Canada

☒ France

☒ Sweden

☒ Turkey

☒ Austria

- ☒ Norway
- ☒ Poland
- ☒ Denmark
- ☒ Finland
- ☒ Germany
- ☒ Hungary
- ☒ Iceland
- ☒ Portugal
- ☒ Argentina
- ☒ Australia
- ☒ Indonesia
- ☒ Singapore
- ☒ Switzerland
- ☒ Saudi Arabia
- ☒ South Africa
- ☒ Taiwan, China
- ☒ Republic of Korea
- ☒ China, Macao Special Administrative Region
- ☒ United Kingdom of Great Britain and Northern Ireland

- ☒ Belgium
- ☒ Croatia
- ☒ Ireland
- ☒ Bulgaria
- ☒ Colombia
- ☒ Malaysia
- ☒ Pakistan
- ☒ Costa Rica
- ☒ Luxembourg
- ☒ Netherlands
- ☒ New Zealand
- ☒ Philippines
- ☒ Russian Federation
- ☒ Hong Kong SAR, China
- ☒ United Arab Emirates
- ☒ United States of America
- ☒ Democratic People's Republic of Korea

(3.6.1.8) Organization specific description

Provide IT services that continue to assist customers reduce their GHG footprint.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☒ Medium-term

☒ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

☒ Medium-low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

This opportunity will have negligible or marginal increase in profit for our organization but no effects on our cash flow.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

Kyndryl is currently evaluating the cost to realize the opportunity; however, it is not in a position to disclose. But we will disclose in the near future. For the purpose of this questionnaire, we have currently entered the value "zero".

(3.6.1.26) Strategy to realize opportunity

Kyndryl has set up Green IT through which we offer customers services that can reduce their carbon footprint. The improved use of technology and innovation support resource efficiency, workplace optimization, data management, emissions reduction, and logistics network optimization may lead to cost reductions for Kyndryl's customers.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp6

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resilience

☒ Increased upstream value chain resilience

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Upstream value chain

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Spain

☒ Canada

☒ France

☒ Israel

☒ Norway

☒ Ireland

☒ Australia

☒ Greenland

☒ Netherlands

☒ Belgium

☒ Denmark

☒ Finland

☒ Germany

☒ Iceland

☒ United States of America

☒ United Kingdom of Great Britain and Northern Ireland

☒ Switzerland

(3.6.1.8) Organization specific description

- *Improve climate resiliency requirements during supplier selection process.*

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Other, please specify :Improved efficiency and lower climate risks across supply chain

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☒ Medium-term

☒ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

- ☒ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

- ☒ Medium

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

This opportunity will have negligible or no impact on our financial position or cash flow.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

Kyndryl is currently evaluating the cost to realize the opportunity; however, it is not in a position to disclose. But we will disclose in the near future. For the purpose of this questionnaire, we have currently entered the value "zero".

(3.6.1.26) Strategy to realize opportunity

Kyndryl aims to focus during the supplier selection process by ensuring the service provider incorporates climate change-related resiliency so any disruptions can be avoided. Kyndryl understands the importance of Service Providers and Co-location providers with access to renewable energy and facilities with resilience towards climate change-related disasters.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp7

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resilience

☒ Increased resilience to impacts of climate change

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- | | |
|--|--|
| ☒ Chile | ☒ Canada |
| ☒ Italy | ☒ France |
| ☒ Japan | ☒ Israel |
| ☒ Spain | ☒ Mexico |
| ☒ Brazil | ☒ Norway |
| ☒ Poland | ☒ Iceland |
| ☒ Sweden | ☒ Ireland |
| ☒ Belgium | ☒ Portugal |
| ☒ Denmark | ☒ Australia |
| ☒ Germany | ☒ Costa Rica |
| ☒ Luxembourg | ☒ United States of America |
| ☒ Netherlands | ☒ United Kingdom of Great Britain and Northern Ireland |
| ☒ Switzerland | |
| ☒ South Africa | |
| ☒ United Arab Emirates | |

(3.6.1.8) Organization specific description

• Implement and continually test robust redundancy measures for power and cooling systems within datacenters to ensure uninterrupted IT service and safeguard against potential climate-related disruptions, such as power outages or equipment malfunctions

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Other, please specify :Decreased cost of compliance. Lower operating costs. Increased business continuity. Higher client satisfaction.

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Medium-term

☒ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

☒ Medium

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

This opportunity might save operating costs for a particular facility during onset of any significant climate change related disasters.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

Kyndryl is currently evaluating the cost to realize the opportunity; however, it is not in a position to disclose. But we will disclose in the near future. For the purpose of this questionnaire, we have currently entered the value "zero".

(3.6.1.26) Strategy to realize opportunity

Kyndryl's business continuity team as well as Operations works closely to build resiliency in our data center to ensure operations are not disrupted.
[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:

☒ Revenue

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

0

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☒ Less than 1%

(3.6.2.4) Explanation of financial figures

Kyndryl is currently in the process of quantifying financial metrics aligned with opportunities and will disclose them in the near future. Kyndryl is currently estimating that this is likely less than 1% of our total revenue. For the purpose of submitting the questionnaire, we have entered the value as 'zero'
[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☒ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☒ Quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☒ Executive directors or equivalent

☒ Non-executive directors or equivalent

☒ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☒ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

Our Board established the oversight structure to support management's execution of our corporate citizenship strategy. The Board's oversight of corporate risk management is multi-tiered and shared among the Audit Committee, Compensation and Human Capital Committee and Nominating and Governance Committee. Each committee assists the Board in overseeing matters most aligned with the responsibilities set forth in its charter, and the Committees provide regular reports to the Board. The purpose of the Nominating and Governance Committee is to advise and make recommendations to the Board concerning corporate governance principles and directorship practices, and to recommend qualified candidates to the Board, consistent with the criteria approved by the Board, for election as directors

of the Company, including the slate of directors that the Board proposes for election by stockholders at the Company's Annual Meetings. The Committee is responsible for leading the search for qualified individuals for election as directors to ensure the Board has the right mix of skills and expertise. The Committee reviews and considers the Company's position and practices on corporate political or charitable contributions and environmental matters, and, except as otherwise delegated to the other committees of the Board of Directors, corporate responsibility matters and monitors evolving environmental, corporate responsibility, and governance risks and opportunities.

(4.1.6) Attach the policy (optional)

Nominating and Governance Committee Charter (January 2023).pdf
[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

Climate change

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

☒ Yes

Biodiversity

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

☒ No, and we do not plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

☒ Not an immediate strategic priority

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

We believe we have a minimal direct impact on biodiversity, and based on our Double Materiality Assessment, it has not been deemed a material topic for Kyndryl. However, we acknowledge the importance of biodiversity and the significant connection between climate and nature. Using the Integrated Biodiversity Assessment Tool (IBAT), we conducted multi-site and site-specific assessments. Based on the results of these assessments, we identified focus locations — considering biodiversity metrics, water consumption, water stress, and employee presence — where we believe we can make the most significant impact with targeted projects that support biodiversity.

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- ☒ Chief Executive Officer (CEO)
- ☒ Chief Sustainability Officer (CSO)
- ☒ Board-level committee
- ☒ Other, please specify :Corporate Citizenship Executive Committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- ☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- ☒ Other policy applicable to the board, please specify :Corporate Environmental Sustainability Policy

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- ☒ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☒ Reviewing and guiding annual budgets
- ☒ Overseeing the setting of corporate targets
- ☒ Monitoring progress towards corporate targets
- ☒ Overseeing and guiding value chain engagement
- ☒ Approving corporate policies and/or commitments
- ☒ Monitoring supplier compliance with organizational requirements
- ☒ Monitoring compliance with corporate policies and/or commitments
- ☒ Overseeing and guiding the development of a climate transition plan
- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☒ Approving and/or overseeing employee incentives
- ☒ Monitoring the implementation of the business strategy
- ☒ Overseeing reporting, audit, and verification processes
- ☒ Monitoring the implementation of a climate transition plan
- ☒ Overseeing and guiding the development of a business strategy

(4.1.2.7) Please explain

Kyndryl's Board of Directors is ultimately responsible for overseeing the strategic direction of the company and the development and implementation of our climate-related risk strategy and net-zero commitment as part of our broader corporate citizenship strategy. Executive leadership, including the Chief Executive Officer (CEO), the Global Head of Corporate Affairs and the Senior Vice President (SVP) of Global Citizenship and Sustainability (GCS), supports Board oversight through engagement with the Corporate Citizenship Executive Committee. Board engagement with management helps integrate climate-related considerations into corporate business strategy and risk management. Reporting to the Board, the Corporate Citizenship Executive Committee is responsible for the implementation of Kyndryl's corporate citizenship strategy and provides quarterly updates on ESG matters, including climate-related topics such as impacts, potential opportunities for GHG emissions reductions, mitigation strategies, market trends and regulation updates that may impact business operations. Oversight of corporate citizenship metrics in compensation strategy is by the Compensation and Human Capital Board Committee. Oversight of corporate responsibility matters is by the Nominating and Governance Board Committee. Our Chairman of the Board, CEO and the leader of the management team are responsible for overseeing the direction of Kyndryl's business and corporate citizenship strategy through their role in the Corporate Citizenship Executive Committee (Executive Committee). The CEO and the Global Head of Corporate Affairs oversee the Executive Committee, a cross-functional team of senior leaders led by the SVP of Global Citizenship and Sustainability (GCS). The Executive Committee meets at least quarterly and is responsible for developing, managing and overseeing Kyndryl's overall corporate citizenship strategy, which includes climate- and environment-related policies and programs, initiatives and risks. The Executive Committee assigns climate-related responsibilities to its senior leaders to help ensure incorporation in key business functions. The Global Head of Corporate Affairs and the SVP of GCS provide periodic updates to the Board and Nominating and Governance Committee on environmental and corporate sustainability matters. Our governance system for climate-related risks and opportunities allows for cross-functional alignment in support of environmental and climate change programs, and other key principles of Kyndryl's corporate citizenship strategy. The SVP of GCS is responsible for the execution and advancement of climate and sustainability-related initiatives and the management of climate-related risks. The GCS team has evaluated and prioritized environmental and climate-related risks for inclusion into the GCS-maintained Environmental and Energy Management System (E&EnMS) program and the corporate Enterprise Risk Management (ERM) program.

[Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☒ Executive-level experience in a role focused on environmental issues

☒ Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition

Other

☒ Other, please specify :A former Chair of the Michigan Sustainability Leadership Council and the Michigan Climate Executive Advisory Group is a current Kyndryl Board member.

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	Select from: ☒ Yes
Biodiversity	Select from: ☒ Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Committee

☒ Other committee, please specify :Corporate Citizenship Executive Committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- ☒ Managing engagement in landscapes and/or jurisdictions
- ☒ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a climate transition plan
- ☒ Implementing a climate transition plan
- ☒ Managing annual budgets related to environmental issues
- ☒ Implementing the business strategy related to environmental issues
- ☒ Developing a business strategy which considers environmental issues
- ☒ Managing environmental reporting, audit, and verification processes
- ☒ Managing major capital and/or operational expenditures relating to environmental issues

(4.3.1.4) Reporting line

Select from:

- ☒ Other, please specify :Global Head of Corporate Affairs

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ Quarterly

(4.3.1.6) Please explain

Kyndryl's Board of Directors is responsible for overseeing the strategic direction of the company and the development and implementation of our climate-related risk strategy and net-zero commitment as part of our broader corporate citizenship strategy. Executive leadership, including the CEO, the Global Head of Corporate Affairs and the SVP of Global Citizenship and Sustainability (GCS), supports Board oversight through engagement with the Corporate Citizenship Executive Committee. Board engagement with management helps integrate climate-related considerations into corporate business strategy and risk management. Reporting to the Board, the Corporate Citizenship Executive Committee is responsible for the implementation of Kyndryl's corporate citizenship strategy and provides quarterly

updates on environmental, social and governance (ESG) matters, including climate-related topics such as impacts, potential opportunities for GHG emissions reductions, mitigation strategies, market trends and regulation updates that may impact business operations. The CEO and the Global Head of Corporate Affairs oversee the Executive Committee, a cross-functional team of senior leaders led by the SVP of Global Citizenship and Sustainability (GCS). The Executive Committee meets at least quarterly and is responsible for developing, managing and overseeing Kyndryl's overall corporate citizenship strategy, which includes climate- and environment-related policies and programs, initiatives and risks. The Executive Committee assigns climate-related responsibilities to its senior leaders to help ensure incorporation in key business functions. The Global Head of Corporate Affairs and the SVP of GCS provide periodic updates to the Board and Nominating and Governance Committee on environmental and corporate sustainability matters. The SVP of GCS is responsible for the execution and advancement of climate and sustainability-related initiatives and management of climate-related risks.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Committee

☒ Other committee, please specify :Corporate Citizenship Executive Committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☒ Assessing environmental dependencies, impacts, risks, and opportunities

☒ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☒ Monitoring compliance with corporate environmental policies and/or commitments

(4.3.1.4) Reporting line

Select from:

☒ Other, please specify :Global Head of Corporate Affairs

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☒ As important matters arise

(4.3.1.6) Please explain

We believe we have a minimal direct impact on biodiversity, and based on our Double Materiality Assessment, it has not been deemed a material topic for Kyndryl. However, we acknowledge the importance of biodiversity and the significant connection between climate and nature. Using the Integrated Biodiversity Assessment Tool (IBAT), we conducted multi-site and site-specific assessments. Based on the results of these assessments, we identified focus locations — considering biodiversity metrics, water consumption, water stress, and employee presence — where we believe we can make the most significant impact with targeted projects that support biodiversity.

[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

10

(4.5.3) Please explain

To incentivize executive officers to deliver sustainable long-term value to shareholders, compensation was heavily weighted toward the achievement of performance goals that were based on certain externally reported measures, including Climate and sustainability-related metrics

[Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☒ Other targets-related metrics, please specify :Corporate Citizenship Goals

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

At Kyndryl, we have incorporated corporate citizenship goals as part of the Annual Incentive Plan for executive compensation.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Our executives play a critical role in unifying teams to effectively deliver on our commitments. Further, this is incentivized by our linking corporate citizenship performance to our non-financial Annual Incentive Plan for executives. In FY2025, this helped drive progress on commitments to reduce our environmental impact (Reduced our scope 1, 2 (market-based) and 3 greenhouse gas emissions by 18%, compared to our fiscal 2023 base year), maintain employee engagement levels at or above industry averages, advance key diversity and inclusion goals globally, and enhance governance, ethics and transparency.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Chief Financial Officer (CFO)

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☒ Other targets-related metrics, please specify :Corporate Citizenship Goals

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

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Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ President

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☒ Other targets-related metrics, please specify :Corporate Citizenship Goals

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

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(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

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Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ General Counsel

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☒ Other targets-related metrics, please specify :Corporate Citizenship Goals

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

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Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Chief Human Resources Officer

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☒ Other targets-related metrics, please specify :Corporate Citizenship Goals

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

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(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

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[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: ☒ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

- ☒ Climate change
- ☒ Biodiversity

(4.6.1.2) Level of coverage

Select from:

- ☒ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

- ☒ Direct operations
- ☒ Upstream value chain

(4.6.1.4) Explain the coverage

Kyndryl's environmental policy is applicable to all of its operations and employees, wherever they are carrying out work for Kyndryl or on behalf of Kyndryl.

(4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

- ☒ Commitment to 100% renewable energy
- ☒ Commitment to net-zero emissions

Additional references/Descriptions

- ☒ Description of environmental requirements for procurement

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

- ☒ Yes, in line with another global environmental treaty or policy goal, please specify :Our Environmental policies and objectives are aligned with the leading scientific frameworks, including the Science-Based Targets Initiative and the United Nations Intergovernmental Panel on Climate Change.

(4.6.1.7) Public availability

Select from:

- ☒ Publicly available

(4.6.1.8) Attach the policy

Kyndryl_Corporate_Policy_139_Environmental_Sustainability.pdf
[Add row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

☒ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☒ The Climate Pledge

(formerly GreenBiz) Global Digital Sustainability Alliance

☒ We Mean Business

☒ European Climate Pact

☒ Global e-Sustainability Initiative

☒ Science-Based Targets Initiative (SBTi)

☒ Other, please specify :**Responsible Business Alliance (RBA) Trellis Network**

(4.10.3) Describe your organization's role within each framework or initiative

Kyndryl is an Affiliate Member of the Framework or Initiative mentioned here. Kyndryl's participation in these initiatives supports our vision and goals to advance the sustainability of IT and digital technologies and services across the world and enable other sectors to reduce the environmental impact of their operations by leveraging digital technologies. In particular, Kyndryl contributes with its knowledge and expertise to the following: - help raising awareness on the transition to a clean economy with Trellis Network (formerly Greenbiz) - through events that galvanize, stories that amplify, peer networks that bond, and industry-leading analysis, we define markets and advance opportunities at the intersection of business, technology, and sustainability. - helping us achieve our net-zero target commitment with our work with SBTi. - managing our supply chain in the most responsible way with the Responsible Business Alliance (RBA), the world's largest industry coalition dedicated to responsible business conduct in global supply chains. We are committed to complying with the RBA Code of Conduct in our operations and progressively applying it to our suppliers. In line with the RBA Code of Conduct, we expect suppliers to establish and maintain social responsibility and environmental management systems and to comply with all applicable regulations. - Learning and sharing best practices for achieving integrated environmental sustainability through digital technologies with the Global Enabling Sustainability Initiative (GeSI) - In collaboration with members from major Information and Communication Technology (ICT) companies and organizations around the world. - Engaging and supporting the transition to a fair and climate-resilient net-zero economy by participating in events (including conferences and seminars) with We Mean Business - and its core group of seven business-focused climate nonprofit organizations

[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

☒ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

☒ Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

☒ Paris Agreement

(4.11.4) Attach commitment or position statement

2025 Corporate Citizenship Report_final.pdf

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

☒ Yes

(4.11.6) Types of transparency register your organization is registered on

Select all that apply

☒ Voluntary government register

(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

In addition to the collaborative frameworks or initiatives mentioned above, Kyndryl is a member of several trade associations across the world that advocate in favor of responsible business practices, including for reducing the environmental impact of economic activities. This includes working with organizations that engage on specific policies, laws and/or regulations that may impact the environment. For instance, in Europe, Kyndryl engages with the American Chamber of Commerce for the EU implementation and simplification of the EU's Corporate Sustainability Due Diligence Directive and the EU's sustainability reporting and finance framework through the Omnibus package. Kyndryl's environmental sustainability strategy is explicitly aligned with the United Nations Sustainable Development Goals (UN SDGs). Please refer to our FY25 corporate citizenship reports for more details. <https://www.kyndryl.com/content/dam/kyndrylprogram/doc/en/2025/2025-corporate-citizenship-report.pdf>

[Fixed row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Global

☒ Other global trade association, please specify :The Software Alliance, BSA

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

As a multinational company, Kyndryl must navigate global issues that may impact us, our customers, partners, and other stakeholders. This may require an understanding of global, regional, national and local policymakers and other organizations' policy goals and actions. Kyndryl engages with trade associations to learn insights and trends from meetings and events they organize in relation to issues of interest, such as: AI, cyber security, climate change, privacy, data protection, digital infrastructure and related environmental impacts, IP, radio spectrum, tax, workforce development, climate risk and resiliency, etc. Kyndryl's membership in these associations does not imply they we either influence or endorse the positions that these associations adopt. Our membership fees are currently not disclosed, hence the funding figure reported here should be considered as 'blank'.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 2

(4.11.2.1) Type of indirect engagement

Select from:

- ☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Asia and Pacific

- ☒ Other trade association in Asia and Pacific, please specify :US-India Strategic Partnership Forum (USISPF)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

- ☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

- ☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

- ☒ No, we did not attempt to influence their position

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digital infrastructure and related environmental impacts, IP, radio spectrum, tax, workforce development, climate risk and resiliency, etc. Kyndryl's membership in these associations does not imply they we either influence or endorse the positions that these associations adopt. Our membership fees are currently not disclosed, hence the funding figure reported here should be considered as 'blank'.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 3

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☒ Other trade association in Europe, please specify :AmCham EU, AmCham Germany, AmCham Poland, AmCham France, AmCham Italy

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

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(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 4

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☒ Other trade association in Europe, please specify :Bitkom (Germany)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

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(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 5

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☒ Other trade association in Europe, please specify :TechUK

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

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(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 6

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Asia and Pacific

☒ Other trade association in Asia and Pacific, please specify :The American Chamber of Commerce in Japan (ACCJ)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

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(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 7

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

South America

☒ Other trade association in South America, please specify :Movimento Brasil Competitivo (MBC) (Brazil)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

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(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 8

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Asia and Pacific

☒ Other trade association in Asia and Pacific, please specify :Japan Electronics and Information Technology Industries Association (JEITA)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

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(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 9

(4.11.2.1) Type of indirect engagement

Select from:

- ☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Asia and Pacific

- ☒ Other trade association in Asia and Pacific, please specify :Keidanren (Japan)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

- ☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

- ☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

- ☒ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

As a multinational company, Kyndryl must navigate global issues that may impact us, our customers, partners, and other stakeholders. This may require an understanding of global, regional, national and local policymakers and other organizations' policy goals and actions. Kyndryl engages with trade associations to learn insights and trends from meetings and events they organize in relation to issues of interest, such as: AI, cyber security, climate change, privacy, data protection,

digital infrastructure and related environmental impacts, IP, radio spectrum, tax, workforce development, climate risk and resiliency, etc. Kyndryl's membership in these associations does not imply they we either influence or endorse the positions that these associations adopt. Our membership fees are currently not disclosed, hence the funding figure reported here should be considered as 'blank'.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 10

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Asia and Pacific

☒ Other trade association in Asia and Pacific, please specify :Telecom Services Association (TELESA) (Japan)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

As a multinational company, Kyndryl must navigate global issues that may impact us, our customers, partners, and other stakeholders. This may require an understanding of global, regional, national and local policymakers and other organizations' policy goals and actions. Kyndryl engages with trade associations to learn insights and trends from meetings and events they organize in relation to issues of interest, such as: AI, cyber security, climate change, privacy, data protection, digital infrastructure and related environmental impacts, IP, radio spectrum, tax, workforce development, climate risk and resiliency, etc. Kyndryl's membership in these associations does not imply they we either influence or endorse the positions that these associations adopt. Our membership fees are currently not disclosed, hence the funding figure reported here should be considered as 'blank'.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 11

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Asia and Pacific

☒ Other trade association in Asia and Pacific, please specify :Tech Council of Australia

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

As a multinational company, Kyndryl must navigate global issues that may impact us, our customers, partners, and other stakeholders. This may require an understanding of global, regional, national and local policymakers and other organizations' policy goals and actions. Kyndryl engages with trade associations to learn insights and trends from meetings and events they organize in relation to issues of interest, such as: AI, cyber security, climate change, privacy, data protection, digital infrastructure and related environmental impacts, IP, radio spectrum, tax, workforce development, climate risk and resiliency, etc. Kyndryl's membership in these associations does not imply they we either influence or endorse the positions that these associations adopt. Our membership fees are currently not disclosed, hence the funding figure reported here should be considered as 'blank'.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 12

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

North America

☒ US Chamber of Commerce

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

This organization's position on climate change is sometimes not consistent with our position, as this organization represents a diverse group of businesses, and its position on climate policies mostly reflects the views of its fossil fuel members. As a multinational company, Kyndryl must navigate global issues that may impact us, our customers, partners, and other stakeholders. This may require an understanding of global, regional, national and local policymakers and other organizations' policy goals and actions. Kyndryl engages with trade associations to learn insights and trends from meetings and events they organize in relation to issues of interest, such as: AI, cyber security, climate change, privacy, data protection, digital infrastructure and related environmental impacts, IP, radio spectrum, tax, workforce development, climate risk and resiliency, etc. Kyndryl's membership in these associations does not imply they we either influence or endorse the positions that these associations adopt. Our membership fees are currently not disclosed, hence the funding figure reported here should be considered as 'blank'.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

☒ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

- ☒ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

- ☒ Other, please specify :Kyndryl FY25 Corporate Citizenship Report

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
- ☒ Water
- ☒ Biodiversity

(4.12.1.4) Status of the publication

Select from:

- ☒ Complete

(4.12.1.5) Content elements

Select all that apply

- | | |
|---|---|
| ☒ Strategy | ☒ Value chain engagement |
| ☒ Governance | ☒ Dependencies & Impacts |
| ☒ Emission targets | ☒ Public policy engagement |
| ☒ Emissions figures | ☒ Content of environmental policies |
| ☒ Risks & Opportunities | |

(4.12.1.6) Page/section reference

Please refer to Section 1 (Powering Progress for our Business), Section 2 (Powering Progress for the Environment) and Section 5 (Data and Disclosures).
<https://www.kyndryl.com/content/dam/kyndrylprogram/doc/en/2025/2025-corporate-citizenship-report.pdf>

(4.12.1.7) Attach the relevant publication

2025 Corporate Citizenship Report_final.pdf

(4.12.1.8) Comment

Kyndryl's Third sustainability report, referred to as 'FY 2025 Corporate Citizenship Report' (CCR).

Row 2

(4.12.1.1) Publication

Select from:

☒ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

☒ Other, please specify :SASB

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☒ Climate change

☒ Water

(4.12.1.4) Status of the publication

Select from:

☒ Complete

(4.12.1.5) Content elements

Select all that apply

- ☒ Governance
- ☒ Emissions figures

(4.12.1.6) Page/section reference

Please refer to the Table 1 and 2 attachment of the SASB Report - FY25

(4.12.1.7) Attach the relevant publication

2025-sasb-content-index.pdf

(4.12.1.8) Comment

Kyndryl FY 2025 SASB Report attached

Row 3

(4.12.1.1) Publication

Select from:

- ☒ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

- ☒ TCFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- ☒ Climate change