CK HUTCHISON GROUP TELECOM HOLDINGS LIMITED

(Incorporated in the Cayman Islands with limited liability)

ENABLING A SUSTAINABLE,
INCLUSIVE AND THRIVING DIGITAL ECONOMY

Sustainability Report 2024

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ABOUT CKHGT

" **CKHGT is a leading global operator and innovator of converged telecommunications and digital services.** "

A pioneer in mobile data communication technologies, CK Hutchison Group Telecom Holdings Limited (CKHGT) is a leading global operator and innovator of converged telecommunications and digital services, implementing innovative technologies in international interconnectivity.

During the reporting period (1 January to 31 December 2024), it operated in eight markets: UK, Italy, Sweden, Denmark, Austria, Ireland, Hong Kong SAR and Macau SAR.

It forms part of CK Hutchison Holdings Limited (CKHH or CK Hutchison) - a multinational conglomerate committed to development, innovation, technology, leadership and sustainability in four core businesses: ports and related services, retail, infrastructure, and telecommunications.

CKHGT has a strong commitment to the highest standards of corporate governance, transparency and accountability. Environmental and social sustainability responsibilities are taken seriously with programmes and innovations across the CKHGT businesses to address related challenges.

FIGURE 1: CKHGT OPERATIONS[1]

3 Ireland
Ireland's largest mobile telecommunications provider, with 48% market share and almost 4.9 million active customers.

3 Sweden
Sweden's fastest growing mobile operator with 2.7 million subscriptions, as well as 500 new, and 3,600 upgraded 5G sites providing coverage for almost 80% of Sweden's population.

3 Denmark
A growing mobile network provider with 1.7 million active customers and over 82% 5G coverage.

Hutchison Telecommunications Hong Kong Holdings Limited (HTHKH)
A leading mobile telecommunications operator that provides services in Hong Kong and Macau with approximately 4.6 million active customers, providing 5G coverage to 99% of the Hong Kong population.

3 UK[5]
Over 10 million active customers and awarded fastest 5G network by Ookla®[2].

Wind Tre
A multi-service operator that offers connectivity, energy and insurance products[4]. The number one mobile operator in Italy, with 17.8 million active mobile customers and among the main alternative carriers in the fixed line market.

3 Austria
One of Austria's three major, full-service telecommunications operators, with over 2.8 million active customers. Multiple award winner in Connect rankings across 2023 and 2024[3] and reaching 90% outdoor 5G coverage by the end of 2024.

1 All customer numbers are as at 31 December 2024.
2 Based on analysis by Ookla® of Speedtest Intelligence® data for Q1-Q2 2021 to Q3–Q4 2024.
3 Awards for service and mobile B2B set out at: https://www.drei.at/de/ueber-uns/unternehmen/auszeichnungen/
4 Energy and insurance services offered by third-party partners. Wind Tre S.p.A. insurance intermediary registered in section A-Agents of the Register of Undertakings and Intermediaries (RUI), subject to supervision by Istituto Per La Vigilanza Sulle Assicurazioni (IVASS).
5 A merger between **3** UK and Vodafone UK, was finalised on May 31, 2025, creating a new entity named VodafoneThree, in which CKHGT will own a 49% stake going forward.

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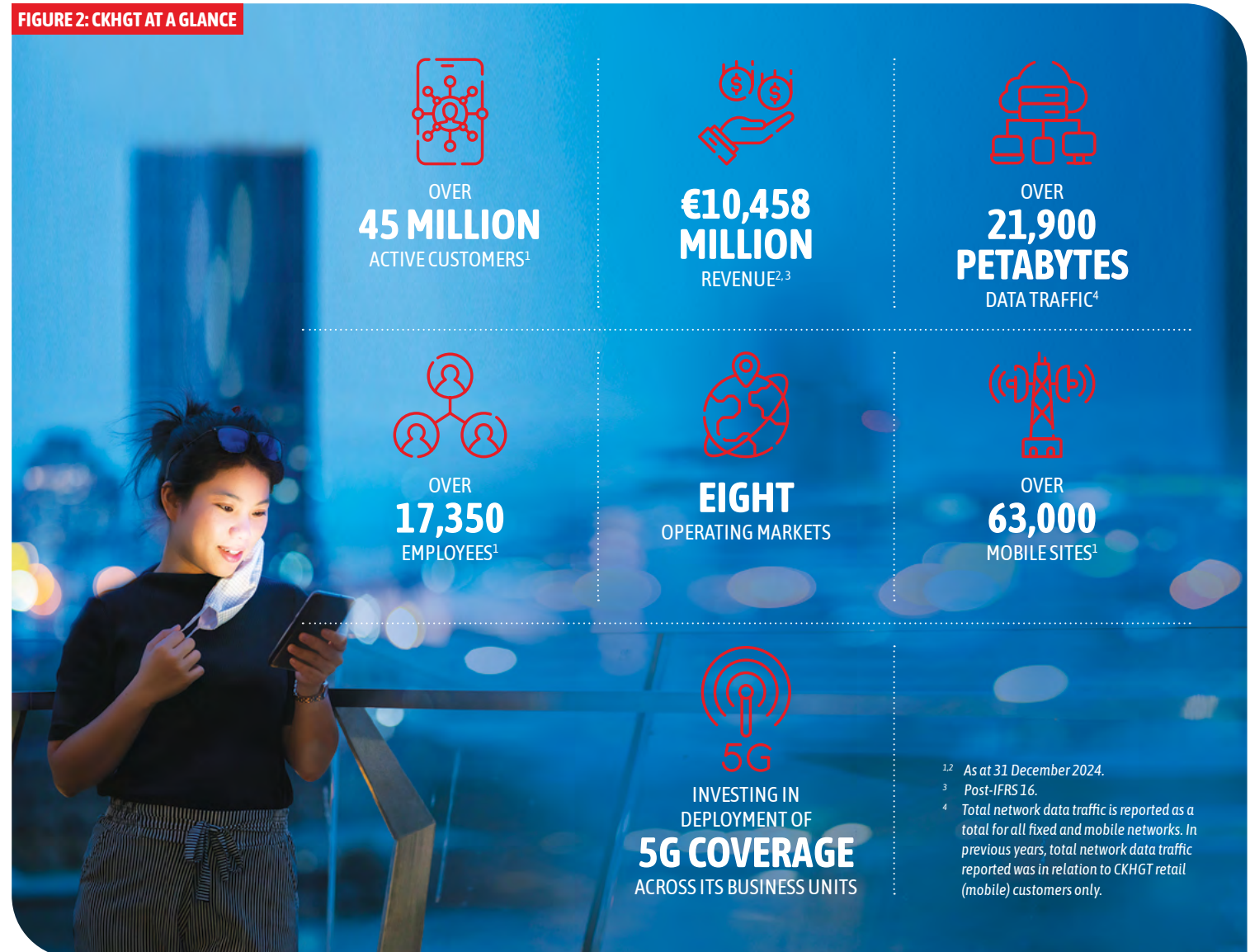
ABOUT CKHGT

OUR PURPOSE

CKHGT plays an essential role in society, connecting over 45 million people across its operating markets, enabling people to work, learn, do banking and shopping, and to connect with friends and families. It also forms an integral part of business and government operations, acting as a driver of economic growth and living standards.

CKHGT aims to be environmentally responsible in the way it manages its businesses and networks. It is focused on growing the opportunities for positive social and environmental impact through its products and services, including through supporting the transition to a low-carbon economy.

CKHGT's role in serving society is clear — to build a sustainable, inclusive and thriving digital economy.

FIGURE 2: CKHGT AT A GLANCE

OVER **45 MILLION** ACTIVE CUSTOMERS[1]

€10,458 MILLION REVENUE[2,3]

OVER **21,900 PETABYTES** DATA TRAFFIC[4]

OVER **17,350** EMPLOYEES[1]

EIGHT OPERATING MARKETS

OVER **63,000** MOBILE SITES[1]

5G INVESTING IN DEPLOYMENT OF **5G COVERAGE** ACROSS ITS BUSINESS UNITS

[1,2] As at 31 December 2024.
[3] Post-IFRS 16.
[4] Total network data traffic is reported as a total for all fixed and mobile networks. In previous years, total network data traffic reported was in relation to CKHGT retail (mobile) customers only.

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MESSAGE FROM THE CHAIRPERSON

> **"As the macro economic, geopolitical, and regulatory landscape has evolved, CKHGT has continued to strengthen its focus on embedding sustainability within its business. CKHGT recognises the importance of understanding the impacts, risks and opportunities that are material to its business, and of developing and implementing policies and strategies that reflect and respond to these. "**

As a leading global operator and innovator of converged telecommunications and digital services, CKHGT has an essential role in society, helping to drive economic productivity and to support the wellbeing of people within its markets. At the same time, it has a responsibility to mitigate actual and potential negative impacts and to manage business risks, for example by taking action on the climate transition, increasing the use of circular business models, and protecting customers from scams, fraud, and other digital safety threats.

I am pleased to report on the progress made this year by CKHGT with respect to its sustainability strategy and achievements.

Since 2022, CKHGT has had Science Based Targets initiative (SBTi)-approved near-term targets in place: reducing scope 1 and 2 greenhouse gas (GHG) emissions by 50% by 2030; and reducing scope 3 GHG emissions by 42% by 2030, each against a 2020 baseline. In 2024, CKHGT also set a long-term target to be net-zero across scopes 1, 2, and 3 by 2050, and submitted this target for validation by the SBTi[1].

In 2024, we remained constant in our scope 1 and 2 GHG emissions footprint versus 2023, and achieved a reduction of 25% against our 2020 baseline, demonstrating good progress towards the achievement of our target. We increased our procurement of renewable electricity to 64% of our consumption, up from 61% in 2023 which, combined with increased energy efficiency, helped to offset the increased carbon intensity of the residual mix in electricity grids. All operations continued to invest in energy efficiency measures with the implementation of network optimisation features, virtualisation of core network and network services, and optimisation of data centres, including through the use of artificial intelligence (AI). In 2024, **3** UK implemented industry-leading energy-efficient radios, together with AI and data analytics, in partnership with Ericsson, improving network energy efficiency by up to 70% at selected sites. Our Hong Kong operation, HTHKH, signed a memorandum of understanding with Huawei International Company Limited (Huawei) on a 5.5G green strategy collaboration to implement an industry-leading AI energy-saving solution across 5G base stations in Hong Kong, enabling automatic switching to a smart energy-saving mode during low traffic periods, reducing energy consumption while maintaining superior customer service.

Our scope 3 emissions decreased by 6% compared to 2023. 2024 was the first year of our supplier engagement programme on climate change, as a member of CDP Supply Chain. In coming years, we will continue to expand supplier engagement on GHG disclosure and target-setting, as a key element of our climate transition plan.

Throughout the year, CKHGT business units continued to innovate in, and deploy products and services that leverage next-generation technologies for positive impact, including smart city solutions. For example, **3** Ireland reached the significant milestone of supporting over three million internet of things (IoT) connections in Ireland and has expanded its role beyond providing connectivity, now delivering tailored IoT solutions that transform business models for customers across diverse sectors. Wind Tre signed 16 new 'smart cities' agreements with municipalities, expanding the programme to 41 cities overall.

In a world with economic uncertainty, we recognise the important role that digital technologies play in supporting equal access to opportunity for our customers. We therefore continue to invest in programmes that help reduce the digital divide. For example, Wind Tre reached the milestone of connecting 100 small villages as part of its 'Connected Villages' project, supporting municipalities in modernising infrastructure, enhancing productivity, and promoting tourism to enhance rural connectivity and inclusion. **3** UK achieved 88% geographic coverage by the end of 2024, thereby enhancing digital inclusion across the UK.

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[1] *CKHGT's long-term net-zero target has been approved by the SBTi in 2025.*

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MESSAGE FROM THE CHAIRPERSON

CKHGT collaborated across its business units and with other parts of CKHH on detailed preparations for the Corporate Sustainability Reporting Directive (CSRD) - undertaking value chain mapping and double materiality analysis in line with its requirements. Further to the release of the Omnibus Simplification Package, we are monitoring regulatory developments closely and continuing to progress our sustainability strategy, including projects that are core to the requirements of new regulation and the expectations of our stakeholders across all of our markets.

I am proud to report that this year, CKHGT was included in the Sustainalytics' 2024 Top-Rated ESG Companies List - receiving ESG Top-rated badges for our industry and region. This is testament to the steady progress made by CKHGT on all aspects of ESG performance and management over a number of years.

Finally, I would like to say thank you again this year to all our team members across CKHGT for their hard work and dedication.

Canning Fok

Deputy Chairman of CKHH;
Executive Chairman and Managing Director of CKHGT

9 September 2025

Cheung Kong Center, Hong Kong SAR

" **CKHGT business units continued to innovate in, and deploy products and services that leverage next generation technologies for positive impact, including smart city solutions.** "

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ABOUT THIS REPORT

This report is the third standalone report for CKHGT. It outlines CKHGT's sustainability strategy and management approaches to material topics and also covers CKHGT's sustainability performance for the year from 1 January to 31 December 2024 (the reporting period). Previous years' GHG emissions figures presented in this report have been recalculated in light of changes in operational boundaries and refinements to the underlying calculation methodologies. As a result, these figures may differ from those previously disclosed. Further details on the recalculations are provided on page 35 and in Appendix B.

Reporting scope

This report covers the activities of business units over which CKHGT has operational control. The information in this report relates to CKHGT unless otherwise indicated.

KPMG LLP was engaged to undertake independent limited assurance, reporting to CKHGT, using the assurance standards ISAE (U.K.) 3000 and ISAE 3410, for the selected GHG emissions that have been highlighted with an * in this report. KPMG LLP's full statement is available on page 87 of this report.

Reporting frameworks

- **UN Global Compact**
  CKHGT recognises the important framework of the UN Global Compact in providing fundamental sustainable operating principles in the areas of human rights, labour, environment and anti-corruption.

  The parent of CKHGT, CKHH, is a member of the UN Global Compact, and a number of CKHGT business units (for example Wind Tre, **3** Denmark, **3** Austria and **3** Sweden) have taken up direct membership as subsidiaries.

- **The Stock Exchange of Hong Kong Limited ESG Guide**
  As a wholly owned subsidiary of CKHH, CKHGT collects data guided by the framework of the Hong Kong Stock Exchange Limited (HKEX) Environmental, Social and Governance Reporting Guide.

- **Taskforce on Climate-related Financial Disclosures (TCFD)**
  CKHGT supports the TCFD recommendations, and this sustainability report is guided by the TCFD framework in sharing its progress and plans (see section Taking Action on Climate Change).

- **Global Reporting Initiative (GRI)**
  This report references selected standards from the GRI (see Appendix B, 'GRI Index').

- **GSMA's ESG Metrics for Mobile**
  This report has been prepared with reference to the GSMA's ESG Metrics for Mobile and has adopted a number of metrics from this voluntary framework.

- **Additional information**
  The content of this report is supplemented by additional information in the sustainability sections of the corporate websites of CKHGT and its parent company, CKHH.

Feedback

For any feedback and suggestions, contact us via the QR code or here.

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SUSTAINABILITY AT CKHGT

Sustainability governance

Reporting to the Board of CKHGT, the Policy Board is the highest-level executive decision-making body. Its membership includes CEOs of the CKHGT business units, and Mr Frank Sixt (CKHH Group Co-Managing Director and Group Finance Director, CKHGT Group Director). It is chaired by the CEO of CKH Innovations Opportunities Development (CKH IOD) - CKHGT's dedicated innovation and collaboration business. The CKHGT Policy Board is responsible for approving the CKHGT Sustainability Strategy and key strategic projects and public reports. The CKHGT Sustainability Strategy aligns with the CKHH Sustainability Framework.

The CKHGT Sustainability and Climate Change Network (Network) comprises sustainability representatives from each CKHGT business unit, many of whom also lead related functions such as governance, risk and compliance and investor relations, bringing diverse expertise and perspectives. This Network meets quarterly to drive forward sustainability and climate change progress. At the end of 2024, CKHGT held its third in-person sustainability conference for CKHGT business units – a two-day event bringing together sustainability representatives from business units to share best practice and discuss priorities.

The Head of Sustainability for CKHGT also chairs the CKHH European Sustainability Working Group to facilitate knowledge-sharing and collaboration with other CKHH divisions.

Sustainability performance-linked appraisal

CKHH has adopted a strategic initiative to incorporate ESG performance metrics into its long-term remuneration framework, starting with a gradual roll-out at management levels. This builds upon CKHH's established performance appraisal system, which provides all employees with structured feedback on their achievements and development areas.

In 2024, CKHGT developed a set of ESG targets for integration into 2025 short-term incentives. These include, for example, shared priorities related to supplier ESG assessment implementation, female representation in leadership roles, number of employee training hours, scope 1 and 2 GHG reduction targets, renewable electricity procurement, and more.

Wind Tre has a well-established ESG 'composite index' linked to a range of targets (including a GHG reduction target) in its 2030 ESG Plan. This composite index impacts 15% of the short-term incentive. Additionally, for executives, a modified version of the ESG composite index (including the GHG reduction target) is linked to the long-term incentive.

Stakeholder engagement

CKHGT recognises that ongoing engagement with stakeholders is critical to understanding stakeholder needs, expectations and concerns, and to adapting the business and sustainability approach accordingly.

FIGURE 3: KEY STAKEHOLDER GROUPS	
Employees	Governments and regulators
Customers	Local communities
Suppliers and business partners	Non-government organisations (NGOs)
Bond investors	CKHH
Banks and creditors	

CKHGT actively participates in GSMA[2] committees and working groups, playing a central role in industry dialogue on key issues for the sector. For example, CKHGT has senior representation on the GSMA's Technology Group, Strategy Group and Policy Group. CKHGT sustainability representatives participate in the GSMA's Climate Action Working Group, Sustainability Network, EU Sustainability Policy Group and Circular Devices Working Group.

Ongoing engagement with governments and regulators is led by senior corporate affairs officers at European and national levels, as well as within business units, and sustainability investor outreach is led by the CKHH Investor Relations and Sustainability teams.

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SUSTAINABILITY AT CKHGT

Each business unit faces its own set of sustainability challenges and opportunities specific to its market. Business units maintain a close dialogue with local stakeholders, informing their sustainability focus and approach. This is done through a wide variety of mechanisms as outlined in table 1.

Table 1: CKHGT business unit engagement mechanisms and priority topics from engagement

Stakeholder group	Mechanisms for engagement	Priority topics for stakeholder group from engagement
Employees	• Regular employee satisfaction/engagement surveys • Performance reviews • Employee fora, town halls, company events • Focus groups • Intranet and internal newsletters • Webinars	• Employee satisfaction • Career and skills development • Inclusion and diversity • Health, safety and wellbeing • Working conditions
Customers (business and consumers)	• Annual customer satisfaction surveys and net promoter score • Market analysis and customer research • Customer meetings and dialogue with consumer associations • Contact centres, hotlines, email enquiries, mobile applications including messaging apps • Websites and social media platforms • Customer loyalty programmes and events • Mystery shopper programme	• Service excellence and customer satisfaction • Data privacy and cyber security • Online safety • Digital inclusion • Disability inclusion • Decarbonisation • Responsible business conduct • Supply chain responsibility
Government / regulators	• Circulars and guidelines • Compliance reporting for EU regulations • On-site inspections • Representation at committees or panels, roundtables, focus and network groups • Representation to surveys and consultations conducted by regulatory authorities • Ongoing, programmatic engagement with relevant government and regulatory stakeholders • Annual stakeholder perceptions audit	• Financial information • ESG disclosure • Data privacy and cyber security • AI and new technology • Network rollout
Bond investors	• Shareholder/investor meetings • Announcements and circulars • Annual general meetings • Corporate communications including annual, interim and sustainability reports • Email enquiries • Websites • Analyst briefings	• Compliance with EU and other regulations • Anti-corruption and bribery • Data privacy and cyber security • Systemic risk management • Decarbonisation • Labour practices • Supply chain responsibility

Stakeholder group	Mechanisms for engagement	Priority topics for stakeholder group from engagement
Suppliers and business partners	• Supplier reviews and assessments • Supplier questionnaires and surveys • Rating agencies' questionnaires • Sales events, forums and seminars • Supplier training • Audits, on-site visits and privacy compliance checks • Partnership initiatives	• Compliance with EU and other regulations • Decarbonisation and circularity • Data privacy and cyber security • Labour and human rights • Supply chain responsibility
Bankers and creditors	• Announcements and circulars • Annual and interim reports • Sustainability reports • Corporate communications • Regular and ad hoc meetings	• Financial information • Data privacy and cyber security • Decarbonisation • Sustainable finance
NGOs	• Philanthropic engagement and investment with local charities • Regular meetings and collaborations • Seminars • Volunteering at local community events • School discovery visits	• Protection of minors in the digital environment • Digital inclusion • Mental health and wellbeing • Culture, inclusion and diversity
Local communities	• Community projects and local events • Media enquiries and interviews • Press releases and conferences • Websites and social media platforms • Survey with community groups	• Digital inclusion • Data privacy and cyber security

During 2024, as part of its preparation for CSRD disclosures, CKHGT business units conducted a range of dedicated stakeholder engagement exercises based on topics in the European Sustainability Reporting Standards (ESRS), which were assimilated at CKHGT level, informing the double materiality assessment.

For example, **3** Austria conducted an online survey, receiving completed responses from 259 employees and 26 external stakeholders comprising customers, suppliers, government agencies, media and public opinion leaders. **3** Sweden conducted engagement with external stakeholders including selected business partners, major customers and a major investor, as well as issuing a survey to consumers. **3** Denmark conducted an employee survey as well as interviews with business leadership and external stakeholders.
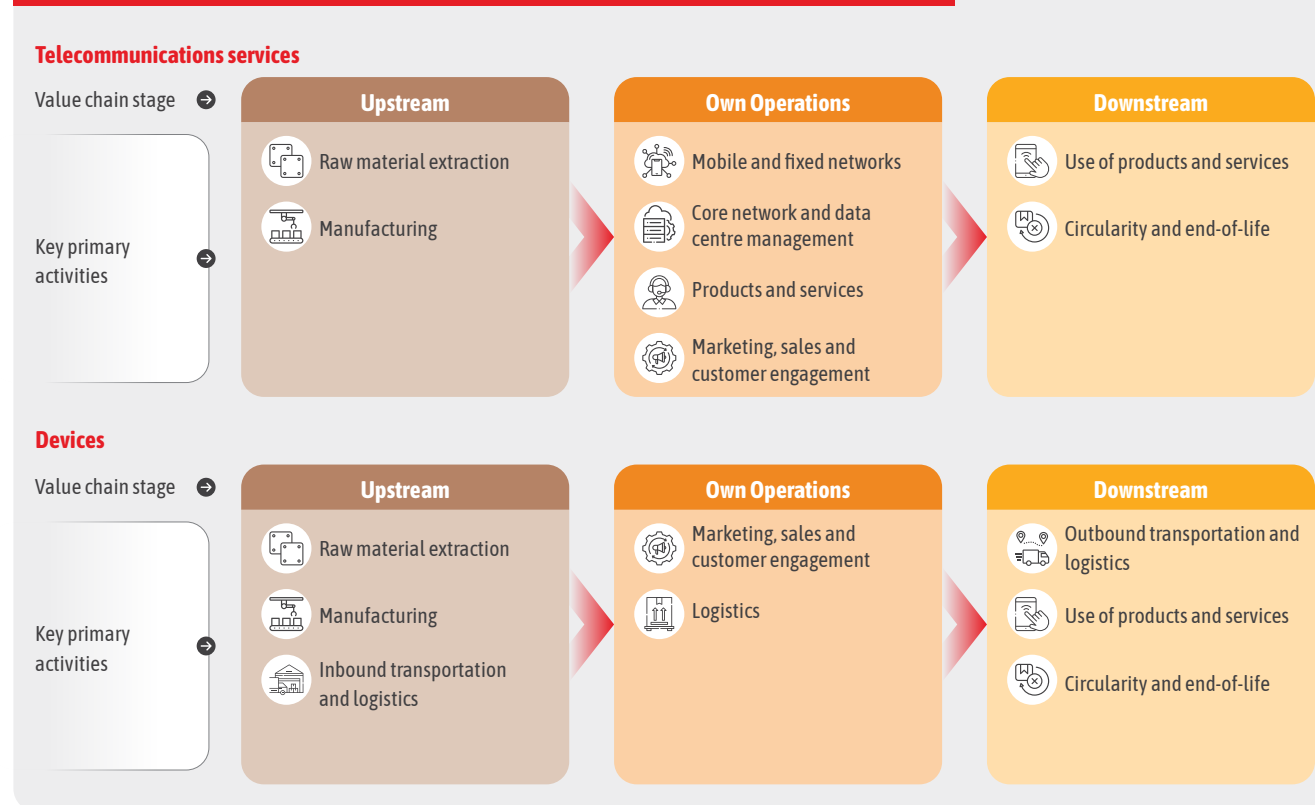
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Double materiality assessment

CKHGT enhanced its approach to double materiality analysis during 2024, assisted by a third-party adviser, and following a comprehensive process aligned with the requirements of the ESRS.

This process began with a full mapping of the two core value chains associated with telecommunications businesses, including key stages and activities, potentially relevant ESG topics, and potentially affected stakeholders. This analysis focused on two core value chains for CKHGT: telecommunications services (connectivity); and devices.

Detailed research was undertaken to identify impacts, risks and opportunities associated with business operations and value chains.

Research sources included:

- Peer benchmarking;
- GSMA whitepapers and documents, such as 'Material Sustainability Issues for the Mobile Sector' and 'ESG Metrics for Mobile';
- Academic papers and media publications related to the telecommunications operating environment;
- Government and regulatory documents;
- ESG rating agency reports;
- CKHGT information including previous materiality assessments and reporting; and
- Results of stakeholder engagement.

The materiality of each impact, risk and opportunity was assessed through a series of dedicated workshops, reviewing the evidence available, and scoring against criteria and thresholds set with the support of a third-party adviser. Impacts were assessed through considering the severity of the actual or potential impact (comprising, scale, scope and irremediable character of the impact) and risks and opportunities were assessed considering significance and likelihood – leveraging the CKHH risk scales applied in the enterprise-wide risk management framework.

Material issues identified through this process are shown in figure 5. For the 2024 reporting year, these are not described in accordance with the ESRS, as CKHGT is continuing its preparation for CSRD reporting and closely monitoring the changes to the ESRS which are expected from the Omnibus Simplification Package. CKHGT will refresh its materiality analysis in future reporting cycles, in the context of those changes, and the definition and description of topics identified as material may change.

FIGURE 4: CKHGT CORE VALUE CHAINS – TELECOMMUNICATION SERVICES (CONNECTIVITY) AND DEVICES

Telecommunications services

Value chain stage →

Upstream
- Raw material extraction
- Manufacturing

Own Operations
- Mobile and fixed networks
- Core network and data centre management
- Products and services
- Marketing, sales and customer engagement

Downstream
- Use of products and services
- Circularity and end-of-life

Key primary activities →

Devices

Value chain stage →

Upstream
- Raw material extraction
- Manufacturing
- Inbound transportation and logistics

Own Operations
- Marketing, sales and customer engagement
- Logistics

Downstream
- Outbound transportation and logistics
- Use of products and services
- Circularity and end-of-life

Key primary activities →

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SUSTAINABILITY AT CKHGT

FIGURE 5: CKHGT MATERIAL TOPICS

CREATING A THRIVING DIGITAL ECONOMY

Material topics:

Product and service impact

Telecommunications products and services have actual and potential positive impacts on the environment and society. These include the inherent social benefits of fast and reliable connectivity, as well as particular social and environmental benefits where telecommunications and related technologies are used in certain contexts or designed to address specific issues. For example, where use of IoT technologies in fleet management enables GHG savings, or where IOT-enabled remote autonomous cranes support a more diverse and inclusive workforce.

Digital responsibility

There is a range of actual and potential negative impacts of telecommunications technology, including issues of digital safety, digital addiction and threats from scams and fraud. At the same time, telecommunications companies can have a positive impact by offering products, services and education programmes to mitigate these impacts, and by building digital infrastructure and capabilities to support digital inclusion. The particular nature of needs and solutions differs across markets.

Customer responsibility

As an essential service provider, telecommunications companies should maintain fair and ethical customer practices, with feedback mechanisms for customers including complaints mechanisms, and a focus on customer service excellence.

TAKING ACTION ON CLIMATE CHANGE

Material topics:

Climate transition

As a major consumer of energy and a provider of services which depend on critical infrastructure, CKHGT has a responsibility to understand and manage all climate-related impacts, risks and opportunities through its strategy and business model. This encompasses climate change mitigation, involving absolute reductions in scope 1, 2 and 3 GHG emissions, as well as climate adaptation measures that increase resilience to the physical impacts of climate change.

Energy management

Inherently linked to the climate transition, this reflects the importance of purchasing renewable energy and implementing energy efficiency opportunities as network technologies evolve and data traffic grows.

PROMOTING A CIRCULAR ECONOMY

Material topics:

Circular economy and waste

With the ubiquitous use of mobile devices and the significant issue of e-waste, telecommunications companies must take a range of approaches to promote circularity, reduce resource consumption, and reduce waste. This includes for example, measures such as repair and refurbishment to increase the lifespan of devices in use, engagement of suppliers to encourage greater use of recyclable and recycled content, and responsible management of waste.

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FIGURE 5: CKHGT MATERIAL TOPICS

♥ CREATING GREAT PLACES TO WORK

Material topics:

Inclusion and diversity

Telecommunications companies have a responsibility and an opportunity to create more diverse and inclusive workplaces, for example through recruitment practices, employee development opportunities and a focus on pay equity, as well as to address broader issues associated with diversity in the talent pipeline. The specific focus differs across CKHGT's business units depending on local circumstances.

Learning and development

This relates to the opportunities that business units provide to support the ongoing development of their workforce in the context of a fast-changing technological environment and a competitive market for talent. Investments in learning and development can improve employee retention, productivity and innovation.

Employee satisfaction and wellbeing

Efforts to enhance employee satisfaction and wellbeing support a positive workplace culture and are valued by employees and by investors, since they increase the ability of a company to attract and retain talent. This encompasses physical and mental health, meaningful engagement and feedback mechanisms for all employees.

🌐 OPERATING RESPONSIBLY AND WITH INTEGRITY

Material topics:

Supply chain responsibility

All large businesses have a responsibility to understand and manage environmental, social and governance risks in their supply chains. Telecommunications companies procure a diverse range of goods and services, with upstream sectors including raw materials extraction and processing, components manufacturing and assembly and other infrastructure and services. Businesses are expected to identify and manage these risks through due diligence and sustainable procurement practices, aligned with the latest regulations and recognised frameworks.

Data privacy

This remains an ongoing and high-priority topic for all stakeholders including regulators, customers and investors. It is linked to, but distinct from cyber security, relating to the arrangements in place across CKHGT and its business units for maintaining the privacy of customers' personal information in compliance with legislation and aligned with best practice.

Cyber security

The threat of cyber-attacks has significantly increased in recent years and continues to evolve in its nature as technologies change. This is evidenced by the many high profile incidents involving customer loss of data and high costs for business in terms of business disruption, recovery and remediation. As such all stakeholders, including investors, regulators and customers, expect businesses to have robust and comprehensive cyber security governance and risk management arrangements in place.

Business continuity

As a provider and operator of critical infrastructure, and as expected by governments and customers, it is essential that CKHGT businesses have a high level of preparedness and resilience to support the continued operation of telecommunications networks in the event of a major incident. In the context of increased global uncertainty, heightened cyber security risk, and increased frequency of extreme weather events, this becomes ever-more important.

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SUSTAINABILITY STRATEGY

The CKHGT Sustainability Strategy was approved by the CKHGT Policy Board in March 2022. It aligns with the overarching CKHH Sustainability Framework and addresses material topics for CKHGT, setting out key focus areas and specific actions being undertaken within individual business units and as a collective group of companies to deliver on these outcomes. This strategy will be refreshed in 2025.

BUILDING SUSTAINABLE, INCLUSIVE AND DIGITALLY-ENABLED SOCIETIES

CREATING A THRIVING DIGITAL ECONOMY	HELP TO CREATE A THRIVING DIGITAL ECONOMY WHICH BENEFITS EVERYONE	1 NO POVERTY · 3 GOOD HEALTH AND WELL-BEING · 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE · 11 SUSTAINABLE CITIES AND COMMUNITIES · 13 CLIMATE ACTION · 17 PARTNERSHIPS FOR THE GOALS
TAKING ACTION ON CLIMATE CHANGE	UNDERSTAND AND MANAGE OUR CLIMATE IMPACTS, RISKS AND OPPORTUNITIES	7 AFFORDABLE AND CLEAN ENERGY · 11 SUSTAINABLE CITIES AND COMMUNITIES · 13 CLIMATE ACTION · 17 PARTNERSHIPS FOR THE GOALS
PROMOTING A CIRCULAR ECONOMY	PROMOTE SUSTAINABLE USE OF RESOURCES ACROSS OUR PRODUCTS AND NETWORKS	11 SUSTAINABLE CITIES AND COMMUNITIES · 12 RESPONSIBLE CONSUMPTION AND PRODUCTION · 17 PARTNERSHIPS FOR THE GOALS
CREATING GREAT PLACES TO WORK	CREATE WORKPLACES WHICH ATTRACT AND RETAIN DIVERSE TALENT	5 GENDER EQUALITY · 8 DECENT WORK AND ECONOMIC GROWTH · 17 PARTNERSHIPS FOR THE GOALS
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SUSTAINABILITY STRATEGY

Progress Highlights

CREATING A THRIVING DIGITAL ECONOMY

Wind Tre signed **16** new 'smart cities' agreements expanding the programme to **41** cities overall.

3 Ireland reached the milestone of supporting over **3 million** IoT connections in Ireland and has become a leader in integrated IoT solutions.

Wind Tre reached the milestone of signing memorandums of understanding with **100** small villages since the launch in 2022 of its 'Connected Villages' project, which is aimed at reducing the digital divide between Italy's rural villages and cities.

CKDelta was launch partner for the Databricks Data Intelligence Platform for Energy, with its ΔPower intelligent application for optimisation of electric vehicle charging structure the first application made available on the platform.

3 UK became the first mobile network operator in the UK to offer Continuing Professional Development qualifications through its '3 Discovery' programme, aimed at enhancing digital skills across communities.

TAKING ACTION ON CLIMATE CHANGE

Total scope 1 and 2 emissions decreased by **25%** against the baseline year of 2020.

Total percentage of renewable energy consumption for CKHGT grew from 61% in 2023 to **64%** in 2024.

3 UK implemented industry-leading energy-efficient radios, together with AI and data analytics, in partnership with Ericsson, improving network energy efficiency by up to **70%** at selected sites.

HTHKH signed a memorandum of understanding with Huawei, on a 5.5G green strategy collaboration to implement an AI energy-saving solution across 5G base stations in Hong Kong.

CKHGT invited **over 330** suppliers to make climate-related disclosures through CDP Supply Chain.

PROMOTING A CIRCULAR ECONOMY

3 Denmark and **3** UK implemented 'like new' initiatives, joining **3** Sweden, Wind Tre and **3** Austria in offering refurbished devices to customers.

3 Ireland and **3** UK implemented integrated trade-in schemes, further incentivising and making it easier for customers to return devices to store, enabling circularity.

Achieved a **9%** increase as compared to 2023, in devices returned through 'take-back' arrangements across CKHGT.

CKHGT participated in a GSMA working group to develop a whitepaper on the business case for circularity in the mobile phone industry.

Achieved a **59%** reduction in GHG emissions across CKHGT's SIM/eSIM portfolio in 2024, compared to emissions that would have occurred through sale of reference physical SIMs.

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SUSTAINABILITY STRATEGY

CREATING GREAT PLACES TO WORK

All CKHGT business units received recognition for employer brand and experience, including **1**st place 'Employee Experience Champion' in Austria, 'Career Company 2024' in Sweden, 'Top Employer Italy' for the sixth consecutive year, and 'Asia's Best Employer Brand' in Hong Kong.

Business units received recognition for inclusion and diversity including **3** Ireland's 'Best Workplace Diversity Strategy' at the HR Leadership and Management Awards, 'Diversity Leader in Europe 2024' in Wind Tre and the 'equalitA' seal of approval in Austria.

Wind Tre was certified by the EQUAL-SALARY Foundation for the third year, demonstrating its equal pay for women and men.

3 Ireland launched a Mental Health Skills for Managers Programme with **38%** managers across the retail division, Limerick contact centre and Dublin head office trained.

OPERATING RESPONSIBLY AND WITH INTEGRITY

CKHGT was included in Sustainalytics' 2024 Top-Rated ESG Companies List and awarded ESG Top-rated badges for its industry and region.

CKHGT prepared for regulatory change by conducting an in-depth double materiality analysis for compliance with the CSRD.

Wind Tre maintained its ESG rating with EcoVadis, performing in the top **1%** of telecommunications sector companies globally.

3 Ireland achieved, while **3** UK, HTHKH and Wind Tre maintained the ISO 14001:2015 standard.

HTHKH was awarded the 2024 ESG Grand Award at the ESG Awards 2024 organised by Master-Insight.com and The Research Centre for ESG at The Hang Seng University of Hong Kong.

Wind Tre continued to assess supplier ESG performance on the Cribis / Synesgy platform, with **68%** of its procurement team-managed suppliers registered on the platform by the end of 2024.

3 UK and **3** Ireland developed and rolled-out mandatory sustainability training for all employees.

CKHGT implemented new CKHH Policy on Reasonable and Ethical Procurement , Implementation and Use of Artificial Intelligence.

CKHGT retained a score of **B** in its fifth consecutive annual submission to CDP – the world's largest environmental disclosure system – reflecting the proactive measures being taken to manage its environmental impact and transparency in its reporting.

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CKHGT has an essential role to play in driving a 'twin transition' to a digital and sustainable society leveraging its networks, products, services, and the skills of its people. In doing so, CKHGT has a fundamental and positive impact on society, enabling every aspect of digital life.

At the same time, CKHGT has an opportunity and a responsibility to mitigate inherent risks associated with the digital economy – particularly helping to ensure that customers stay safe while using digital technologies, and that all are able to access the benefits of digital technologies, leaving no one behind.

NEXT GENERATION NETWORKS AND CONNECTIVITY SOLUTIONS

CKHGT's world-class, next-generation networks and connectivity include 5G public and private networks, Low Power Wide Area Networks (LPWAN) and IoT solutions, supporting innovative applications across a range of sectors and making lives safer, smarter and more efficient.

5G networks and innovation

5G networks offer super-fast data speeds, consistency of connection, and low latency, supporting innovative applications - many of which have a positive environmental or social impact. They offer more energy-efficient transmission at the high levels of data traffic required by society today, as outlined in the chapter 'Taking Action on Climate Change'.

CKHGT has invested significantly in 5G networks, and deployment of 5G services is now well-progressed across the operating markets. CKHGT continues to work with its partners to deploy innovative solutions that leverage the benefits of 5G for positive impact. For example, Wind Tre's Energy Supervisor solution supports energy monitoring and management; and HTHKH's 3Education portfolio leverages 5G connectivity along with a range of other technologies to support an enhanced education environment.

HTHKH LEVERAGES 5G CONNECTIVITY WITH ROBOTIC SOLUTIONS

HTHKH also successfully supported the deployment of the 5G 'Intelligent Steward' Robotic Solution by HK Electric in 2024, enabling round-the-clock surveillance of a confined cable tunnel and significantly increasing service efficiency and safety.

5G 'Intelligent Steward' Robotic Solution

SMART CAMPUS SOLUTIONS IN HONG KONG

HTHKH offers a full suite of smart campus solutions as part of its 3Education portfolio. These include full 5G network coverage, use of smart robots for transport or guiding tasks, and use of AI, augmented and virtual reality technologies for enhanced teaching methods. During the reporting period, HTHKH continued its collaboration with the Spanish School of Hong Kong, to provide complete 5G mobile network coverage for the entire campus, exemplifying its commitment to create a truly smart campus that enhances educational experiences and fosters innovation.

Tailored 5G solutions to empower smart campuses and advance smart education

ENERGY SUPERVISOR SUPPORTS ENERGY MANAGEMENT IN THE LOGISTICS SECTOR

Wind Tre's Energy Supervisor solution, developed in partnership with Ouvert, is an energy data management solution that combines IoT sensors with AI for continuous data monitoring and measurement of the energy savings created by different interventions. It is used by public bodies and large companies, particularly in the retail and logistics sectors.

For example, Logista's Territorial Warehouse of Agani uses Wind Tre's Energy Supervisor solution, leveraging 4G/5G connectivity for monitoring energy consumption and centralised control of environmental sustainability parameters.

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NEXT GENERATION NETWORKS AND CONNECTIVITY SOLUTIONS

Partnering for sustainable cities

By 2050, nearly 70% of the world's population will be located within cities[1], where approximately two thirds of all energy is consumed each year and where over 70% of the world's GHG emissions are generated[2]. The digitisation of cities can therefore play a fundamental role in decarbonisation. CKHGT is driving initiatives and providing smart city solutions leveraging technologies including 5G and IoT.

WIND TRE PARTNERING WITH ITALIAN MUNICIPALITIES ON SMART CITY SOLUTIONS

As a part of its 2030 ESG Plan, Wind Tre aims to be the 'smart partner of 100 smart cities', delivering 5G-connected innovation to Italian cities. It acts as an advisor for Italian cities to support digital and green transition through energy efficiency, smart mobility, and other solutions. In 2024, Wind Tre signed an additional 16 cities with a total number of 41 cities participating in the programme.

It continues to work with local institutions to extend, strengthen and modernise their digital infrastructure. Services include mobile and video analytics to analyse tourist flows, energy management to monitor and reduce energy consumption, solutions to issue mass alerts for critical events, and IoT services to enhance citizen safety, environmental monitoring, and management of urban services such as traffic and waste. For example, in 2024, Wind Tre supported the Municipality of Florence with Big Data Analytics solutions to inform strategic decisions relating to tourism, transport and communication.

During the reporting year there was strong participation in Wind Tre's 'Smart City Transformation Academy' (the Academy) – a free digital education initiative in association with Forum PA, covering topics such as digital technologies for environmental improvement, saving energy, innovation, mobility, efficient tourism, and the optimisation of public services. The Academy now reaches beyond the Smart Cities programme, engaging administrations of other municipalities interested in smart city topics, universities and local companies.

SHOWCASING SMART CITIES APPLICATIONS IN HONG KONG

DIGIBox, HTHKH's 5G solution hub, hosts visits from educational institutions and students, where they can engage in interactive programmes to experience the transformative power of 5G and learn more about emerging fields such as Web 3.0 and AI. DIGIBox features dedicated zones: Smart City, Smart Port, Smart Retail, Smart Education, Smart Care, Smart Restaurant, and AI and Future.

In 2024, over 40 educational organisations visited the DIGIBox 5G solution hub. The visit offered an immersive experience highlighting 5G capabilities through demonstrations of innovative applications across different sectors. This was followed by a workshop on ChatGPT and digital drawing, designed to introduce AI concepts and spark interest in innovation and creativity among the youth.

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1 World Bank '*Urban Development*'.
2 IEA '*Empowering Cities for a Net Zero Future*'.

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Private networks

For a range of our larger customers, CKHGT's dedicated innovation business, CKHIOD, is working in partnership with business units to design and manage private industrial mobile networks which use 4G, 5G and proprietary technologies. These networks allow customers to run secure and highly reliable applications that support increased productivity, energy efficiency, worker safety, and in certain cases more inclusive working environments.

IMPLEMENTATION OF 5G IN HONG KONG PORT

HTHKH has a strategic collaboration with Hutchison Port Holdings Trust to deploy advanced 5G technology supporting innovative projects within its Hong Kong terminals including remote control of rubber-tyred gantry cranes and AI-enhanced CCTV for security and traffic monitoring. These projects have proven effective in reducing operating costs and enhancing safety and operational efficiency. With this digitally-connected infrastructure in place, the terminals are empowered to unlock new levels of remote execution capabilities, facilitate a greater number of connected devices and implement virtual private real-time networks.

Collaboration with Hutchison Port Holdings Trust to deploy 5G at its Hong Kong terminals

WIND TRE AND PSA ITALY TOGETHER FOR A SMART PORT IN GENOA

In 2015, the Port of Genoa launched a global renewal project, with the aim of making operations even more efficient, modern and safe. Wind Tre is designing, constructing and installing a secure and reliable high-performance 5G private network at the Port of Genoa to support this aim. The first part of the project was completed in June 2024. The entire project, which involves operations throughout the terminal, will be completed by the end of 2025.

PSA Italy terminal at Port of Genoa

3 AUSTRIA SUPPORTS NEXT GENERATION 112 SERVICE DEVELOPMENT WITH FREQUENTIS

During the year, in partnership with CKH IOD, **3** Austria developed a private 5G network at the Vienna headquarters of Frequentis - a global leader in air traffic management and public safety command and control solutions. The network will form part of Frequentis' own research and development capabilities, allowing experimentation with new software solutions on a dedicated 5G network, simulating different locations and real-world conditions.

This 5G standalone network, with its own 5G core, enables data transmission regardless of public network utilisation, with quality of service maintained both indoors, and outdoors using network slicing on the public **3** Austria 5G network.

Furthermore, all company data remains within the Frequentis premises, meeting the strictest data security requirements, and offering ideal conditions for demonstration and testing of its safety-critical communication solutions.

The private network will help Frequentis to accelerate new public safety solutions that will allow first responders to cooperate across agencies in the most challenging situations and environments.

Frequentis headquarters in Vienna

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NEXT GENERATION NETWORKS AND CONNECTIVITY SOLUTIONS

LPWANs and IoT applications

> **Already, there are more than 22 billion[3] connected IoT devices in the world, with that number expected to grow to 40 billion by 2030[4].**
>
> **A 2018 analysis of more than 640 IoT deployments showed that 84% of existing IoT deployments have the power to meaningfully advance the SDGs[5]. In conjunction with AI and analytics, IoT solutions offer even more powerful tools to make decisions that create better societal outcomes and to support the transition to a lower carbon economy by 'enabling' GHG reductions. A GSMA study[6] estimated the potential for avoided emissions across buildings, transport, manufacturing and energy sectors to be ten times greater than the global carbon footprint of mobile networks themselves.**

CKHGT has invested in the development of LPWANs that support IoT connectivity in applications where small amounts of data are transmitted over a longer period and where the ultra-low latency of 4G and 5G is not required. Across CKHGT, Narrowband-IoT (NB-IoT) is operational in Italy, Austria and Ireland; Long-term Evolution for Machine Type Communications (LTE-M) is operational in Ireland; and LoRaWAN is operational in Austria.

CKHGT business units offer connectivity management through a dedicated platform, enabling users to self-manage a portfolio of IoT SIMs, and allowing for remote and real-time tracking of asset performance, location, and condition. This granular remote asset insight and control, greatly reduces the need for physical engineer site visits, thereby reducing customer transport emissions.

In 2024, CKHGT grew its IoT connections by 16%, with the most significant area of growth being the connection of residential and commercial electricity meters, where the ability to monitor the energy consumption of assets, be they heavy machinery or household devices, enables better forecasting and reduced energy wastage. CKHGT currently has over five million SIM cards in utility meters across Ireland, Austria and Italy, helping customers actively monitor their consumption of electricity, gas and water.

Further, 3 Ireland has become a centre of excellence for IoT innovation, moving beyond connectivity to deliver tailored IoT solutions across a diverse range of use case, and transforming business models across a range of sectors and geographies.

3 IRELAND – CKHGT'S CENTRE OF EXCELLENCE FOR IOT INNOVATION

3 Ireland has reached a significant milestone, supporting over three million IoT connections and achieving a market share of over 75%. The company has expanded its role beyond providing connectivity, now delivering tailored IoT solutions that transform business models for customers across diverse sectors such as manufacturing, agriculture, energy, and retail. In 2023 alone, 3 Ireland facilitated 600,000 new connections, including in smart energy meters, connected lifebuoys, IoT-enabled cameras, and devices for temperature and condition monitoring in pharmaceutical transport. Security remains a key focus, with 3 Ireland ensuring robust protection of its IoT solutions through private access point names (APNs) to safeguard customer networks.

3 Ireland has become a leader in integrated IoT solutions and a centre of excellence for CKHGT, supporting IoT deployments internationally. With ongoing investments in local expertise, 3 Ireland is set to continue its leadership in IoT, providing end-to-end solutions for businesses of all sizes across various industries.

Smart camera for footfall analytics in the IoT centre of excellence

Environmental monitor in the IoT centre of excellence

3   Statista, 'Number of connected devices worldwide'.
4   State of IoT 2024.
5   World Economic Forum 'What is the internet of things'.
6   GSMA 'Enablement Effect'.

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LEVERAGING LORAWAN INVESTMENTS FOR POSITIVE IMPACT IN AUSTRIA

3 Austria has deployed a countrywide LoRaWAN network supporting sustainable applications such as smart electricity and smart water management, as well as other innovation use cases.

For example, municipalities such as the City of Wolfsberg use energy-saving, smart water meters to measure water consumption in real-time with sensors that are connected to the LoRaWAN, supporting water and energy-saving, remote meter readings and a quick response to emergencies such as unplanned water leaks.

3 Austria continues to work with its partners to innovate and deploy solutions leveraging the LoRaWAN network. Maschinenring Service NÖ-Wien, in collaboration with IoT Systems and **3** Austria, is using IoT-based temperature monitoring to support Winter services in Lower Austria. The solution utilises ground and air sensors to provide real-time temperature data, replacing traditional weather forecasts and manual checks. Data is transmitted via **3** Austria's energy-efficient LoRaWAN network, allowing scalable and cost-effective operation of maintenance-free sensors for up to ten years.

This system reduces road salt usage, cutting costs and environmental impact while improving road safety during winter conditions. Following a successful pilot phase, the solution will be expanded to additional municipalities.

SMART RING BUOYS - LEVERAGING IOT TO ENHANCE WATER SAFETY AND SAVE LIVES

The Smart Ring Buoys project, a collaboration between Dublin City Council, Water Safety Ireland and the Department for Rural and Community Development, leverages **3** Ireland's IoT technology to enhance water safety and combat theft or tampering. Ring buoys are equipped with low-cost NB-IoT sensors supported by **3** Ireland's LPWAN technology, enabling real-time alerts when buoys are moved or go missing, ensuring their prompt replacement. Deployed at 150 locations along the Liffey Banks and canals, the sensors offer an energy-efficient solution with batteries lasting over a decade. This initiative has the potential to save costs and potentially saves lives by ensuring lifebuoys are always available, demonstrating the transformative power of IoT in public safety and infrastructure management.

Lifebuoy with the 3 Ireland IoT sensor, monitoring use and location

SMART ELECTRICITY METERING IN IRELAND AND UK

Since 2019, **3** Ireland has been working in partnership with Ireland's leading energy utility, ESB Networks, to support the rollout of smart electricity meters to every home, farm and business by the end of 2025. ESB Networks uses **3** Ireland SIMs embedded in smart meters that measure the energy consumption of individual customers at half hourly intervals. Connectivity is provided by **3** Ireland's dedicated purpose-built network which includes 2G and LPWAN capability. The smart meters enable customers to make informed choices about their electricity usage, and the smart metering supports an increase in renewable power on the electricity system, helping to cut CO_2 emissions. To date, over 1.86 million smart meters have been installed.

Further, **3** Ireland has partnered with the Atlantic Economic Corridor to provide Applegreen – one of Ireland's largest petroleum retailers, with a service that allows them to monitor and adjust their electricity usage at a granular level. It also provides IoT solutions for UK Power Networks to help manage and maintain their power grid, and to Northumbrian Water in relation to management of water infrastructure.

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ARTIFICIAL INTELLIGENCE AND DATA ANALYTICS

CKDelta is CKHH's dedicated artificial intelligence business, specialising in the design and development of innovative solutions using diverse and unparalleled data sets from across CK Hutchison and other partners. Through its suite of Intelligent Applications, CKDelta is building and licensing solutions to its clients that address a range of challenges, many directly supporting the transition to a more sustainable future.

It partners with leading businesses in a range of industries including electric vehicles, utilities, retail, ports and more – providing actionable insights from data combined with bespoke modelling and analytics to deliver innovative and proven solutions. For example, CKDelta's ΔPriority intelligent application is helping UK Power Networks identify vulnerable customers as part of their 'Spotlight' innovation project.

CKDELTA INSIGHTS ENABLING SOCIALLY INCLUSIVE UTILITY PROVISION

CKDelta's ΔPriority product uses advanced machine learning to identify vulnerable customers across categories such as Priority Services Register (PSR), Fuel Poor, and Leaving No One Behind (LNB). By combining over 30 datasets – including smart meter data, payment history, telecoms, and socio-economic indicators – it creates a unified vulnerability profile. The models are continuously retrained to reflect real-world changes and ensure accuracy.

This AI-driven approach has identified over 400,000 vulnerable customers, unlocked £5 million in annual regulatory incentives, and improved engagement strategy effectiveness by 30 percent. ΔPriority enables proactive, personalised support at scale, setting a new standard for ethical, data-led customer care.

The CKDelta intelligent app provides three key insights to UK Power Networks:

Identification:
ΔPriority utilises advanced clustering and a diverse range of datasets, creating a unique classification system for identifying vulnerable customers.

Service:
ΔPriority includes advanced machine learning capabilities to accurately classify customers needs according to those outlined in regulation so that those heavily dependent on electricity are prioritised for supply.

Communication:
ΔPriority uses AI and data to increase engagement and combat digital exclusion with sophisticated engagement strategies employing methods like A/B testing.

CKDELTA SUPPORTS SMARTER ENERGY SYSTEMS

In 2024, CKDelta was the launch partner for the Databricks Data Intelligence Platform for Energy – a centralised data and AI platform enabling the use of asset, operations, environmental, and customer data to deliver a safer, more reliable, and smarter energy system. CKDelta will build a suite of intelligent apps on the platform, with ΔPower the first made available. ΔPower leverages a range of datasets to optimise the strategic placement of charging stations for electric vehicles.

databricks × CK△

Launch Partner

Data Intelligence Platform for Energy

Unleash the full power of AI in energy

The use of data and AI capabilities is also seen as vital for the energy sector to achieve net-zero emissions by 2050, particularly in accelerating the transition to clean energy sources and improving collaboration across the energy ecosystem. CKDelta intelligent apps on the Databricks Data Intelligence Platform will enable the energy industry to innovate for revenue growth, cost savings, enhanced safety and improved sustainability.

A number of business units are also leveraging data analytics expertise in combination with mobile and other data sets, to assist customers and create positive impact. For example, in 2024:

A collaboration between **3** Sweden Data Insights and The Train Brain has assisted the City of Stockholm in becoming the first in the world to use positioning data, provided by **3** Sweden, to measure the behaviour of a population when introducing a car-free zone to an urban environment (the Stockholm City Environment Zone).

3 Denmark's Data Insights team is leveraging aggregated and anonymised data on population movement to provide valuable insights and tools to support optimisation of public transport, electric vehicle infrastructure and energy systems.

3 Austria completed the Drei Wetter rollout in Vorarlberg, combining mobile communications with meteorology, and making the smart weather measuring stations available to 100 municipalities in Lower Austria and emergency organisations.

3 Ireland continued to assist Limerick County council, providing anonymised and aggregated data via its 'Data Insights by Three' platform, for use by the council in urban transport planning with a view to reducing vehicle traffic and increasing pedestrian traffic in the city centre.

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DIGITAL SAFETY AND WELLBEING

As the digital world has grown, so too has the misuse of the internet. Risks and issues faced by customers include security of personal data as they use their devices, potential exposure to offensive or abusive content, the threat of cyberbullying, and the mental health impacts of social media use. CKHGT is playing its part in protecting customers using the controls that are available, including its products and services, and is supporting customers to use the internet as safely as possible through a growing range of education programmes.

Products and services for digital security

CKHGT continues to offer and expand its range of products and services to help protect the online safety and security of customers.

Wind Tre has a 2025 goal to support its business customers in being fully secure and protected with cyber security and data protection solutions. It provides two protection services for mobile retail customers: Più Sicuri Mobile (Safer Mobile), and Più Sicuri Mobile Pro (Safer Mobile Pro), designed to protect smartphones from internet-related risks.

Wind Tre offers a Child Protection Service which is automatically activated on Wind Tre SIM cards for customers aged under-18, as well as adults on request via customer care, blocking online access to apps and websites that are not suitable, or are prohibited for underage users on the Wind Tre network.

Wind Tre also offers Secure Web – a cyber security service addressing the needs of SMEs on both fixed and mobile network services, with more than 630,000 companies covered by Wind Tre's cyber security solutions at the end of 2024. In addition, Wind Tre launched a platform for additional cyber security services and awareness dedicated to its SME customers.

In partnership with award-winning cyber security company Corrata, **3** Ireland offers a business mobile security solution, **3**Mobile Protect, that protects mobile devices from phishing and malware and prevents data loss on company smartphones and tablets. This responds to the increasing number of mobile phishing attacks occurring outside of email, and the importance of raising standards of mobile security – which is often given less attention than laptop computer security by businesses.

3 SWEDEN SAFEKID GPS WATCHES

3 Sweden partnered with Safekid to offer GPS watches for children, aimed at helping kids stay in touch with loved ones while safely exploring the mobile world. The Safekid GPS watch allows children to make calls, send messages to approved contacts, and gives parents peace of mind with location-tracking and communication features. **3** Sweden is the first mobile operator in the country to collaborate with Safekid.

Smartwatch for kids from Safekid

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DIGITAL SAFETY AND WELLBEING

HELPING BUSINESS TACKLE IDENTITY THEFT AND FRAUD

In 2024, CKHGT continued to scale its innovative Digital Identity solution 'Subscriber Intelligence', empowering businesses to deliver safer online experiences through more effective user identity verification, transaction authentication, fraud risk detection and regulatory compliance.

With increasing threats from cyber fraud, socially engineered scams and individual-led fraud, the ability to verify a user's identity is vitally important to our personal, financial and socio-economic wellbeing.

Subscriber Intelligence is an enterprise-grade 'Application Programming Interface' (API) product suite developed by CKH IOD that leverages CKHH's mobile data assets for anti-fraud purposes. In December 2024, CKH IOD also launched the first in a series of Open Gateway telecommunications industry-led CAMARA Network APIs, further extending access to potential benefits from this service.

Currently, via its CKH IOD-developed Global Digital Hub, CKHGT is providing access to over unique 50 data attributes. The API services are available in several CKHH telecommunications business units including **3** Austria, **3** Ireland, **3** Denmark, **3** Sweden, **3** UK, Wind Tre and Indosat Ooredoo Hutchison Indonesia.

Over 500 use cases have been deployed to date, spanning industries including: banking, finance, insurance, eCommerce, social media, on-demand services, gaming, utilities, healthcare, transport, and government and public services.

CKHGT is continuing to expand the scope and reach of its APIs through 2025 and 2026, delivering increasingly enhanced capabilities to businesses and enterprises that leverage telecommunications network assets for the mutual benefit of customers.

A number of business units have also launched solutions that help protect customers from scam phone calls.

SCAM PREVENTION SOLUTIONS

Free 'Incoming Calls Management Pack' for customers aged 60 or above

HTHKH fully supports the Office of the Communications Authority (OFCA) and the Hong Kong Police Force in combatting phone scams, offering comprehensive mobile security services. This includes the 'Incoming Calls Management Pack' with two value-added services – 'Anti-scam' and 'Call Block', which assist customers to identify and block scam and nuisance calls. Moreover, in a bid to protect the elderly from phone scams, in 2024, HTHKH lowered the age requirement to aged 60 or above with free access to this phone scam prevention service. It also collaborated with the Hong Kong Police to spread anti-phone scam messaging via SMS and helped OFCA display Prefix # leaflets at shops to promote the SMS Sender Registration Scheme.

Wind Tre continues to provide its free service, 'Please Don't Call', on the Wind Tre mobile app. This service identifies potential scam calls to the customer before they answer the call. Customers are able to report new scam calls that have not been identified by the service, as well as confirm identified numbers as trusted callers where appropriate. As at the end of 2024 this service had been activated and used at least once by approximately two million customers.

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DIGITAL SAFETY AND WELLBEING

Digital Safety Education

A number of business units have developed digital safety programmes and resources for parents, guardians, teachers and children, and have engaged in safety commitments and campaigns with partners to reinforce messages of safety and respect on the internet, in accordance with the needs of local markets.

Wind Tre offers leading digital safety education platform, 'NeoConnessi', from which over 1.5 million students have benefitted since 2018. In 2024, **3** UK partnered with Internet Matters to promote digital wellbeing and online safety for children and families, complementing its other child protection initiatives such as content-filtering and age verification for users under 18.

Furthermore, responding to the growing concern in many countries about the impact of digital addiction and 'screen time' on mental health, **3** UK launched a new online 'Screen Time' training for adults.

Educational project NeoConnessi

WIND TRE PROVIDES DIGITAL SAFETY EDUCATION FOR CHILDREN AND PARENTS

In 2018, Wind Tre designed and made available to all, NeoConnessi, a digital responsibility project for schools that seeks to support families and teachers when children use the internet or devices for the first time. The NeoConnessi project has a dedicated platform which provides articles, insights, technical tips, and advice on how to create a healthy balance of control and trust between parent and child. Experts and experienced parent bloggers also contribute to ensure the content is best suited to the needs of parents.

At the end of 2024, the NeoConessi project had benefitted over 1.5 million families since its launch. In 2024, NeoConnessi launched a training course for parents named 'Digital Families Today: Surfing Together Safely', which emphasises shared responsibility, guiding parents to set clear rules and good practices for safe internet browsing.

NeoConnessi also further strengthened its proposition by extending to middle schools, establishing a scientific committee and strengthening its relations with governmental institutions.

3 UK LAUNCHES NATIONWIDE SCREEN TIME TRAINING TO HELP ADULTS MANAGE DEVICE USAGE

In 2024, **3** UK launched a nationwide initiative to help adults manage their screen time, recognising that 58% of British adults find this as challenging as children do. While 64% of adults say smartphones make their lives easier, a third feel there is insufficient support to address issues like 'doomscrolling' and being distracted from conversations. To help address this, **3** UK is offering Screen Time training in its 297 UK stores and online, equipping over 2,300 retail staff to provide tips on using inbuilt screen management tools and adopting mindful usage habits. Developed in collaboration with neuroscientist Dr. Jack Lewis, the training aims to foster healthier relationships with digital devices.

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DIGITAL INCLUSION

Digital exclusion may occur for multiple reasons including lack of access to telecommunications networks or devices, or lack of digital skills. Research has shown that about 37% of the world's population, or 2.9 billion people[7], are still offline and excluded from the direct benefits of the global digital economy although levels of digital inclusion, and barriers to inclusion, vary widely across operating markets. Groups with higher levels of digital exclusion include older people, people with disabilities, and lower socioeconomic groups. CKHGT is working to promote digital inclusion in a range of ways.

Digital inclusion for seniors

CKHGT is reducing barriers for senior citizens to access the benefits of digital technology. In pursuit of its goal to enable digitisation of seniors, Wind Tre has extended its leading NeoConnessi digital safety and inclusion platform, to include 'NeoConnessi Silver' – dedicated to seniors. Its training course, video tutorials, articles and insights are designed to actively contribute to the digital inclusion of older people by training them on basic digital skills and strengthening the bond between generations on digital safety.

In several markets, CKHGT offers 'Doro' mobiles – easy-to-use devices specifically designed for seniors and other more vulnerable customers.

HTHKH is committed to fostering the wellbeing of the elderly population in an increasingly digital society. It offers service accessibility for senior citizens through various initiatives such as its Lo-Yau-Kee Monthly Service Plans Sponsorship Programme and the provision of data service sponsorships to cater to different customer needs.

Remote community access

CKHGT is helping to close the rural-urban connectivity gap that persists in many operating markets. **3** UK is working with the UK Government and other mobile operators on the Shared Rural Network, which will provide coverage for 280,000 additional dwellings and 16,000 additional kilometres of rural roads. In 2024, **3** UK completed the construction of 416 sites, achieving over 89% geographic coverage, including meeting the 88% Partial Not Spot (PNS) geographic coverage target, and providing new 4G connectivity to over 349,000 premises.

In January 2023, Wind Tre and Iliad Italia S.p.A. signed a RAN-sharing agreement to create a joint venture, Zefiro Net, which will rollout network infrastructure in rural areas, creating synergies and reducing the costs of developing and maintaining network assets in those regions.

Another core initiative of Wind Tre's ESG Plan is also its 'Connected Villages' project.

WIND TRE CONNECTING RURAL VILLAGES

'Borghi Connessi' or the 'Connected Villages' project, launched in 2022 as part of Wind Tre's 2030 ESG Plan, is aimed at promoting greater digital inclusion and reducing the digital divide that exists between Italy's rural villages and cities.

The project works with villages across a number of dimensions including digital infrastructure, digital skills, and advice, bringing a holistic approach to digital inclusion. Focused on sustainable growth and digital transformation, the project supports municipalities in modernising infrastructure, enhancing productivity, and promoting tourism.

Borghi Più Belli d'Italia ('most beautiful villages in Italy') Festival

In 2024, the project reached the milestone of connecting more than 100 small Italian municipalities.

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7   United Nations Department of Economic and Social Affairs, '_Social Inclusion_'.

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DIGITAL INCLUSION

Digital inclusion for those experiencing disadvantage

CKHGT recognises the important role it plays in providing digital access and skills for people experiencing disadvantage, and is therefore helping to support access to opportunities, as well as helping people to maintain access to digital services in times of difficulty. Communities served by CKHGT continued to be impacted by economic and cost-of-living challenges, as well as difficulties due to the ongoing conflict in Ukraine.

In 2024, business units continued to respond to these challenges with programmes donating devices and SIM cards, providing free or discounted mobile services, and zero-rating connection to certain websites to support digital inclusion in times of need.

DIGITAL INCLUSION FOR VULNERABLE CUSTOMERS

According to the latest Digital Nation UK Report from Good Things Foundation, 1.5 million people in the UK don't have a smartphone, tablet or laptop. Through its 'Reconnected' programme, **3** UK enables the donation of used devices, repackaged with unlimited data, calls and texts for six months. NGO partners give the devices a 'second life', ensuring they reach those in need such as job-seekers applying for employment, students without internet access, or vulnerable people needing support. To date, over 18,000 phones have been donated. **3** UK also supports the UK National Databank, run by digital inclusion charity Good Things Foundation, where it has pledged 2 million GB of data, which aims to help an estimated 80,000 people to get connected.

3 UK continues to offer a social tariff through its sub-brand SMARTY aimed at supporting its most vulnerable customers. It is estimated that more than 4.2 million households across the UK could benefit from this new tariff helping those that need it the most to stay connected.

HTHKH supported vulnerable groups with 'Tung Wah Group of Hospitals CEASE Crisis Centre Monthly Service Plans Sponsorship'.

3 Sweden has provided 1.6 million free call minutes and 285,000 free text messages to Ukraine during the past two years.

Empowering communities with digital skills

In world where digital technology has completely transformed the way we live and work, digital skills have become an essential enabler of access to opportunity. **3** UK has responded to this by empowering communities through its Discovery programme.

CONTINUING PROFESSIONAL DEVELOPMENT (CPD) TO BRIDGE THE DIGITAL DIVIDE

In 2024, **3** UK became the first mobile network operator in the UK to offer CPD qualifications aimed at enhancing digital skills across communities. Recognising that around 4.4 million adults in the UK lack basic digital skills, it launched free CPD-certified workshops through its **3** Discovery programme, focusing on essential areas such as online safety, communication tools, and problem-solving. These workshops are designed to be accessible to everyone and are led by industry professionals.

Participants receive CPD certification, which can improve their employability and professional development. It was found that the economic benefit derived from the **3** Discovery programme through the cultivation of digital literacy, allowed individuals with the digital skills to earn up to 29% more. The programme has successfully partnered with local communities, providing structured support to attendees of varying digital abilities.

DIGITAL TOOLS AND SKILLS FOR YOUTH CLUBS

3 UK's 'Connected Communities' programme aims to supercharge youth clubs across the UK, providing high speed 5G Wi-Fi, tablets and digital skills sessions delivered by **3** UK Discovery teams. This project is helping to empower young people with the tools and skills they need to succeed. Four youth clubs in Leeds, Liverpool, Manchester and Birmingham are now connected, with more clubs to come.

*A **3** UK Discovery Partner delivering a Discovery session in the local community*

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DIGITAL INCLUSION

EMPOWERING COMMUNITIES THROUGH AWARD-WINNING DIGITAL SKILLS PROGRAMME

In 2024, **3** UK's Discovery digital skills programme, launched in 2014, won a Silver Stevie Award in the Achievement in Corporate Social Responsibility category in the 21st Annual International Business Awards.

Through the programme, it offers both in-person and online free digital skills training workshops aligned with the UK Department for Education's Essential Digital Skills Framework to ensure that participants receive relevant and impactful training that prepares them for the digital era.

The programme was commended for exemplifying a strong commitment to addressing the digital skills divide and empowering communities through innovative digital skills training initiatives, coupled with its emphasis on social impact and community engagement.

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TAKING ACTION ON CLIMATE CHANGE

- **CLIMATE CHANGE GOVERNANCE**

- **CLIMATE CHANGE RISK MANAGEMENT AND SCENARIO ANALYSIS**

- **GHG FOOTPRINT AND PERFORMANCE**

- **GHG REDUCTION STRATEGY**

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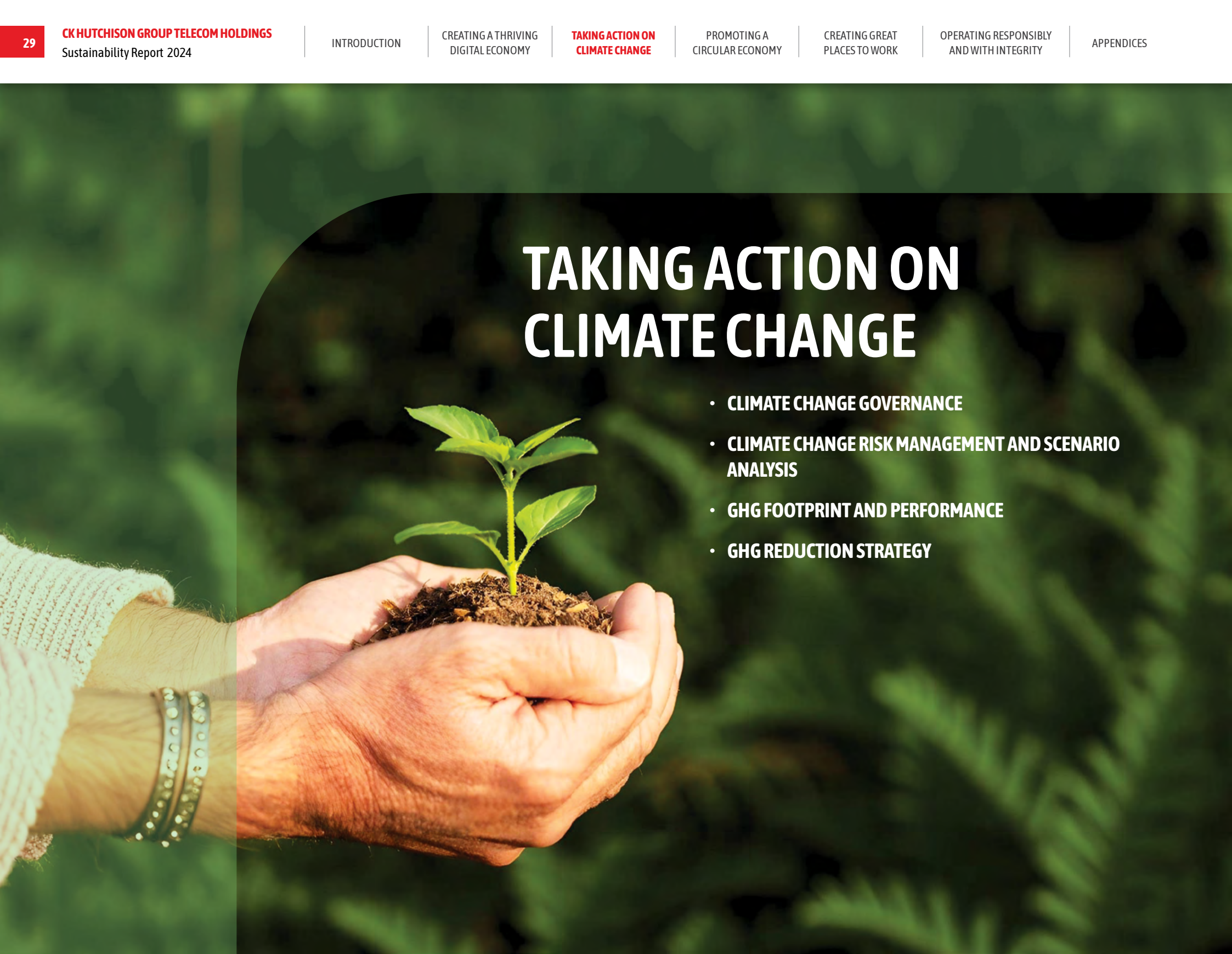
CKHGT supports the internationally-recognised goal of limiting global warming to below 1.5 degrees Celsius and has set a target to reach net-zero across the value chain by 2050. CKHGT recognises the rapid and deep emissions cuts needed for a net-zero future, and the crucial role of companies in reaching that goal. The unprecedented transformation required in our society, both to mitigate climate change and adapt to physical climate impacts, bring risks and opportunities for CKHGT.

CLIMATE CHANGE GOVERNANCE

The governance of CKHGT's climate strategy, including oversight of its climate-related risks and opportunities, follows the overarching structure of its wider sustainability governance which is outlined in the 'sustainability at CKHGT' section of this report. Specific roles and responsibilities related to climate strategy across CKHGT, are shown in figure 6.

In addition to CKHGT-level governance, each of the business units is supported by its own dedicated sustainability lead, governance structure and programmes for management of sustainability and climate-related risks and opportunities at a business unit level.

CKHGT recognises the importance of comprehensive climate-related disclosures and reports annually to the CDP (formerly Carbon Disclosure Project), maintaining its score of grade 'B' in its 2024 disclosure.

CKHGT regards GHG assurance as being an essential part of good climate governance and has obtained assurance of certain aspects of its GHG data by KPMG highlighted with a * for the 2024 financial year, as detailed in appendices A and B of this report. CKHGT has recalculated its baseline on an annual basis since 2022, reflecting various transitions and methodology changes, in accordance with its baseline recalculation policy (published every year in its GHG Reporting Criteria). Further detail of the 2024 recalculation and restatement are outlined on page 35 of this report. Whilst assurance was previously sought in March 2024 over the 2020 baseline calculations, no subsequent external assurance has been obtained in respect of the latest recalculation of the 2020 baseline.

CKHGT's largest business unit, Wind Tre, has integrated climate-related targets into an ESG Composite Index which is linked to remuneration incentives for senior leaders, and is used to drive and monitor progress against its 2030 ESG Plan. Other CKHGT business units are implementing a short- or long-term climate-related target in their incentive plans for 2025.

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CLIMATE CHANGE GOVERNANCE

FIGURE 6: CKHGT CLIMATE GOVERNANCE MODEL

CKHH BOARD OF DIRECTORS
Has oversight and ultimate accountability for the sustainability strategy of CKHH, as well as its management, performance and reporting, with the support of the Sustainability Committee and the Audit Committee which play complementary roles in sustainability management. This includes with respect to climate-related strategy, risks and opportunities.

CKHGT BOARD OF DIRECTORS
Has oversight and accountability for the sustainability strategy of the CKHGT Group, as well as its management, performance and reporting. Approves annual sustainability reports.

Membership of both the CKHH and CKHGT Board includes Mr. Frank Sixt, Group Co-Managing Director and Group Finance Director of CKHH, and Group Director of CKHGT. Mr. Sixt also Chairs the CKHH Sustainability Committee and is a member of the CKHGT Policy Board, bringing sustainability and climate-related expertise to all roles.

CKHH SUSTAINABILITY COMMITTEE
Reviews and reports to the CKHH Board on climate-related risks and opportunities. Progress on CKHH's climate strategy, including for CKHGT, is addressed as a key agenda item.

CKHH AUDIT COMMITTEE
Reviews top risks and reports to the CKHH Board. Ensures risks are identified and managed with due regard to CKHH's risk appetite. Since 2020, climate change has been upgraded as a CKHH-wide risk.

CKHH SUSTAINABILITY WORKING GROUP
Oversight and responsibility for providing strategic direction and developing strategy regarding climate-related risks and opportunities.

EUROPEAN SUSTAINABILITY WORKING GROUP
Collaboration on sustainability across the European region

CKHGT POLICY BOARD
Its membership includes Mr. Frank Sixt, who is also a member of the CKHGT Board, the CKHH Board, and the CKHH Sustainability Committee. The Policy Board also includes CEOs of CKHGT business units. The Policy Board is responsible for approving the CKHGT Sustainability Strategy, and key strategic sustainability projects and public reports. It oversees and approves targets for climate-related risks and opportunities and monitors progress towards those targets. Each CEO ensures that climate-related risks and opportunities are taken into account when overseeing strategy and risk management at the business unit level.

CKHGT SUSTAINABILITY AND CLIMATE CHANGE NETWORK
Responsible for driving collaborative progress on sustainability including climate-related strategy, risks and opportunities across CKHGT business units. Membership includes sustainability leads from all business units.

SUSTAINABILITY	RISK MANAGEMENT	FINANCE	INTERNAL AUDIT	IT	LEGAL	HR & CORPORATE AFFAIRS
Spearheads development of CKHH climate strategy in partnership with key CKHH functions and core business divisions.	Manages the enterprise risk framework and oversight of division-level top risk profiles.	Oversees budgeting, planning and CAPEX approval of climate technology and solutions.	Conducts audits of sustainability-related controls and audits of emissions data.	Manages sustainability data management platform for collection and tracking of emissions data.	Oversees current and future climate-related policy actions that may impact CKHH.	Arranges compensation and talent programmes and corporate communications.

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CLIMATE CHANGE RISK MANAGEMENT AND SCENARIO ANALYSIS

CKHGT, as a member of CKHH, adopts an Enterprise Risk Management framework which is consistent with the Committee of Sponsoring Organisations of the Treadway Commission (COSO) framework. The framework facilitates a systematic approach to identifying, assessing and managing risks, including climate-related risks.

Risk management is an integral part of the day-to-day operations and management of CKHH and is a continuous process carried out at all levels of CK Hutchison, including CKHGT. Additionally, on a half-yearly basis, as part of CKHH's Enterprise Risk Management framework, all business units, including CKHGT, are required to formally identify and assess the significant risks facing their businesses, with input from and review by CKHH Executive Directors. Relevant risk information including key mitigation measures and plans are recorded in a risk register to facilitate the ongoing review and tracking of progress.

Since 2020, climate change has been given additional focus and included in the risk register as one of the top risks that could affect CK Hutchison's financial condition or results of operations.

The composite risk register together with the risk heat map, as confirmed by the CKHH Executive Directors, forms part of the risk management report for review and approval by the CKHH Audit Committee on a half-yearly basis. The Audit Committee, on behalf of the CKHH Board, reviews the report and provides input as appropriate so as to ensure effective risk management is in place.

In 2022, CKHGT set its climate scenarios and performed an initial detailed mapping of climate risks and opportunities in line with the recommendations from the TCFD. These scenarios tested both transition and physical risks under orderly and disorderly pathways, and included a 1.5°C scenario. During 2023, CKHGT further prioritised climate-related risks and opportunities with the assistance of a third-party expert, which served as input to a reassessment of climate-related impacts, risks and opportunities in 2024 as part of the double materiality assessment conducted in preparation for CSRD reporting (table 2). CKHGT will continue to enhance its assessment and reporting on climate-related impacts, risks and opportunities in future years and as reporting frameworks evolve.

Table 2: Climate-related impacts, risks and opportunities identified in the double materiality analysis

Category	Description	Impact, risk or opportunity	Value chain			Timeframe		
			Upstream	Operations	Downstream	Short-term	Medium-term	Long-term
Climate change mitigation	Scope 1 and 2 GHG emissions from operations contribute to climate change, negatively impacting the environment and human safety and security.	Actual negative impact		✓		✓	✓	✓
	Scope 3 GHG emissions from upstream and downstream activities exacerbate climate change, harming the environment and human safety and security.	Actual negative impact	✓		✓	✓	✓	✓
	Carbon-related regulations may increase costs for telecommunications companies and their supply chain.	Risk	✓	✓		✓	✓	
Climate change adaptation	Failure to adapt to climate-related weather events could lead to service disruptions, affecting both business and private telecommunications customers.	Potential negative impact		✓		✓	✓	✓
	Extreme weather events can damage telecommunications infrastructure, leading to revenue loss and repair costs.	Risk		✓		✓	✓	✓
	Chronic climate changes increase maintenance and climate resilience costs for telecommunications infrastructure.	Risk		✓			✓	✓
Climate change mitigation and adaptation	Failure to put in place a robust climate strategy could lead to customer loss and revenue decline.	Risk		✓		✓	✓	
	Lack of climate action could reduce investor confidence and increase capital costs.	Risk		✓		✓	✓	
	Developing sustainability-related products can enhance revenue, increase investor confidence and reduce capital costs.	Opportunity		✓			✓	

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CLIMATE CHANGE RISK MANAGEMENT AND SCENARIO ANALYSIS

CLIMATE ADAPTATION

The physical impacts from climate change present substantial risks to CKHGT operations. CKHGT, aligned to CKHH, acknowledges these potential operational risks and is enhancing resilience through proactive adaptation strategies. Under the guidance of the CKHH Sustainability Policy and reinforced by risks identified and prioritised as part of the enterprise-wide risk management framework, business units are investing in enhancements to protect assets, operations and human capital from extreme weather impacts.

In **3** UK, climate-related events, such as flooding, extreme temperatures, lightning and wildfires are managed at the operational level by subject matter experts who have developed relevant response action plans. Similarly, **3** Ireland recognises physical climate impact as a risk. To mitigate this, it now plans to develop climate adaptation strategies to address environmental risks, such as extreme weather events and disruptions to operations, by integrating climate-related data into risk monitoring processes and assessing potential impacts on infrastructure and service delivery.

HTHKH deployed a checklist for extreme weather conditions procedure to expedite cell site recovery following extreme weather events. Additionally, network specialists closely monitored network continuity and alerts through the real-time Geographic Information System (GIS) mapping system, ensuring prompt resolution of network and system issues.

In 2024, Wind Tre included extreme weather events due to climate change into the enterprise-risk management register, making it part of the business continuity and disaster recovery risk assessment.

SCIENCE-BASED EMISSIONS REDUCTION TARGETS

In 2022, CKHGT received approval of its near term science-based GHG emissions reduction targets from the SBTi. CKHGT is committed to:

REDUCE SCOPE 1 AND 2 GHG EMISSIONS
BY 50%
BY 2030, AGAINST A 2020 BASELINE.

REDUCE SCOPE 3 GHG EMISSIONS
BY 42%
BY 2030, AGAINST A 2020 BASELINE.

These targets are consistent with the level of reduction required to keep global temperature rise to no more than 1.5°C.

In 2024, CKHGT submitted its long-term net-zero target for validation by the SBTi[1].

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[1] CKHGT's long-term net-zero target has been approved by the SBTi in 2025.

GHG FOOTPRINT AND PERFORMANCE

GSMA Intelligence estimates that the telecommunications industry accounts for around 1% of energy use worldwide[1]. Data traffic globally is forecast to nearly triple by 2030 compared to current levels[2], driven by several factors including increased connections, improved device capability, increase in data-intensive content and continued improvements in the performance of deployed networks. Additionally, developments in generative AI may drive mobile traffic growth beyond baseline predictions[3].

However, infrastructure improvements and related efficiency gains, along with greater use of renewable electricity, have driven a decoupling of higher data traffic and emissions. The GSMA reports that over the period 2019-2022, while global internet traffic more than doubled, combined scope 1 and 2 emissions fell by 6%[4]. A priority for CKHGT is to mirror this decoupling effect through its own investments and performance.

CKHGT's 2024 value chain carbon footprint (scope 1, 2 and 3) is shown in figure 7. It has been prepared in accordance with the GHG Protocol. KPMG LLP was engaged to undertake independent limited assurance, reporting to CKHGT, using the assurance standards ISAE (U.K.) 3000 and ISAE 3410, for the selected GHG emissions that have been highlighted with an *. KPMG LLP's full statement is available on page 87 of this report. Detailed information on the reporting methodology can be found in the CKHGT Greenhouse Gas Reporting Criteria 2024 published on the CKHGT website.

Indirect emissions (scope 3) are responsible for 79% of CKHGT's total value chain GHG emissions. Indirect electricity emissions (scope 2) are responsible for 20% (using market-based measurement), of which networks contribute 93% (figure 8) and scope 1 emissions are responsible for 1%, largely related to emissions from its owned and operated fleet, fugitive emissions from air conditioning units, and natural gas heating.

The total scope 1, 2 and 3 footprint is distributed across business units (figure 9) in line with the different sizes of their networks and customer base, with Wind Tre naturally being the largest contributor (47%).

[1] GSMA Intelligence, 'True north: a guide to green network evolution'.
[2] Ericsson Mobility Report.
[3] Ericsson Mobility Report.
[4] GSMA, 'Mobile Net Zero 2024'.
[5] Differences in the total as compared to composite data are due to rounding.

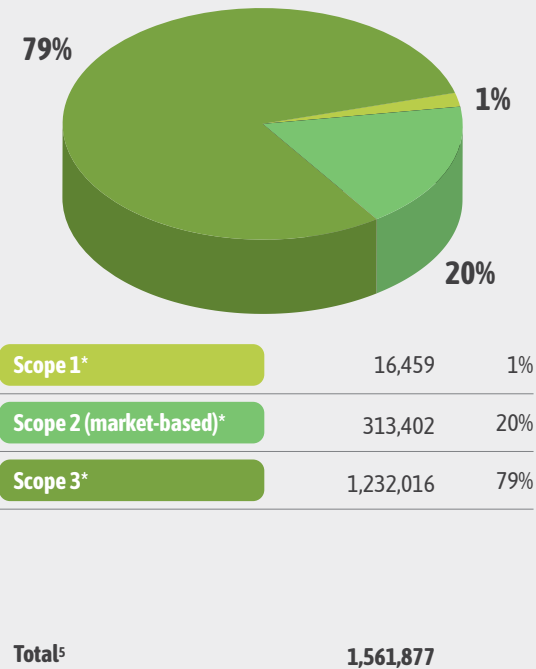**FIGURE 7: CKHGT's 2024 VALUE CHAIN CARBON FOOTPRINT (tCO$_2$e)**

79% 1% 20%

Scope 1*	16,459	1%
Scope 2 (market-based)*	313,402	20%
Scope 3*	1,232,016	79%
Total[5]	**1,561,877**	

FIGURE 8: CKHGT's 2024 SCOPE 2 (MARKET-BASED) CARBON FOOTPRINT (tCO$_2$e)

93% 4% 2% 1% 1%

Networks	292,990	93%
Data centres	12,314	4%
Buildings	7,732	2%
Electric vehicles	59	<1%
Purchased heating and cooling	306	<1%
Total[5]	**313,402**	
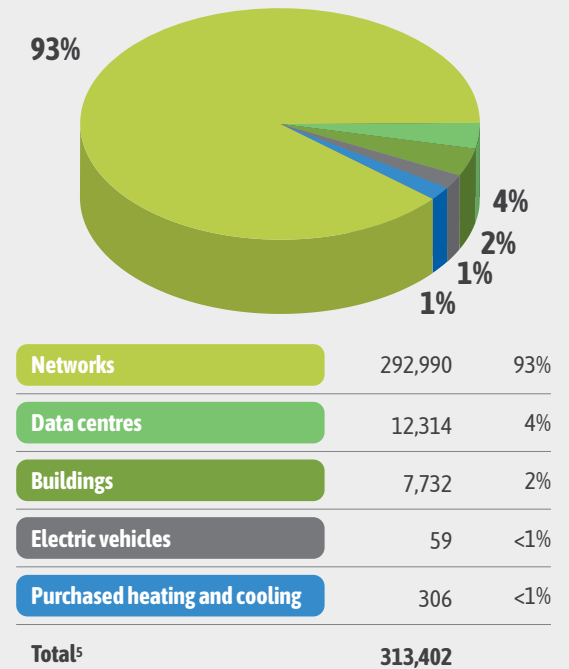
FIGURE 9: CKHGT's 2024 GHG FOOTPRINT (SCOPES 1, 2 (MARKET-BASED) AND 3) BY BUSINESS UNIT (tCO$_2$e)

4% 26% 6% 2% 11% 4% 47%

3 Austria	98,642	6%
3 Denmark	31,725	2%
HTHKH	168,901	11%
3 Ireland	68,340	4%
Wind Tre	731,187	47%
3 Sweden	63,137	4%
3 UK	399,944	26%
Total[5]	**1,561,877**	

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GHG FOOTPRINT AND PERFORMANCE

GHG EMISSIONS RECALCULATION

CKHGT regularly reviews and updates its GHG footprint to maintain accuracy and alignment with both internal policies and international standards. It also recalculates and restates its baseline when there is a significant change in company structure (e.g. acquisition, divestment, insourcing or outsourcing) or inventory methodology, that results in a change in reported data of 5% or more of CKHGT's total base year emissions, for either scope 1 and 2 combined, or scope 3. This is in accordance with its recalculation policy as outlined in the CKHGT Greenhouse Gas Reporting Criteria 2024.

During 2024, Wind Tre completed its acquisition of wholesale fixed wireless access provider OpNet. While the estimated increase in GHG emissions resulting from the acquisition did not trigger a mandatory recalculation according to internal policy, CKHGT undertook a voluntary recalculation, in line with best practice. This recalculation integrated OpNet data into scope 1 and scope 2, with scope 3 category 3 also updated reflecting this change. Other scope 3 categories were not recalculated due to immateriality of the change.

Specifically, the total electricity consumption was increased by approximately 38 GWh per year over the 2020–2023 period. Scope 1 emissions were also adjusted to account for increased fuel consumption from OpNet's company vehicles and a rise in natural gas consumption proportionate to OpNet space requiring heating.

Additionally, during the year, CKHH's internal audit 'Group Management Services' (GMS) team performed an audit of Wind Tre's GHG reporting processes. As a result, CKHGT refined its estimation approach for unmetered electricity consumption, made possible by the availability of more accurate supporting data. In total, these adjustments resulted in an increase of approximately 22–25 GWh per year over the 2020-2023 period.

These amendments combined resulted in an increase in 7% of the scope 1 and 2 baseline total, and an increase of less than 1% of scope 3 baseline total, and a similar change for subsequent years. Further detail is provided in the CKHGT Greenhouse Gas Reporting Criteria 2024.

All reported GHG data in this sustainability report, including performance data and commentary on reductions achieved, reflect this recalculated baseline.

Table 3: CKHGT 2020 GHG recalculated emissions data

GHG emissions	Units	CKHGT 2020 as previously published[6]	CKHGT 2020 recalculated
Scope 1 total	tCO_2e	17,873	18,188
Scope 2 (market-based) total	tCO_2e	396,316	424,458
Scope 2 (location-based) total	tCO_2e	423,209	441,663
Total scope 1 and 2 (market-based) GHG emissions	tCO_2e	414,190	442,646
Total GHG emissions intensity (scope 1 and 2)[8]	tCO_2e / revenue HK$'000	0.004	0.004
Scope 3 category 3: fuel- and energy-related emissions[7]	tCO_2e	115,755	120,320
Scope 3 category 15: investments	tCO_2e	40,094	43,915
Scope 3 total	tCO_2e	1,684,465	1,692,851
Total GHG emissions (scope 1, 2 and 3)[8]	tCO_2e	2,098,665	2,135,497
Total GHG emissions intensity (scope 1, 2 and 3)[8]	tCO_2e / revenue HK$'000	0.024	0.024

CKHGT 2020 GHG emissions have been recalculated to retrospectively reflect OpNet transaction and data improvements following an internal audit. Changes to the other previous years are documented in Appendix B.

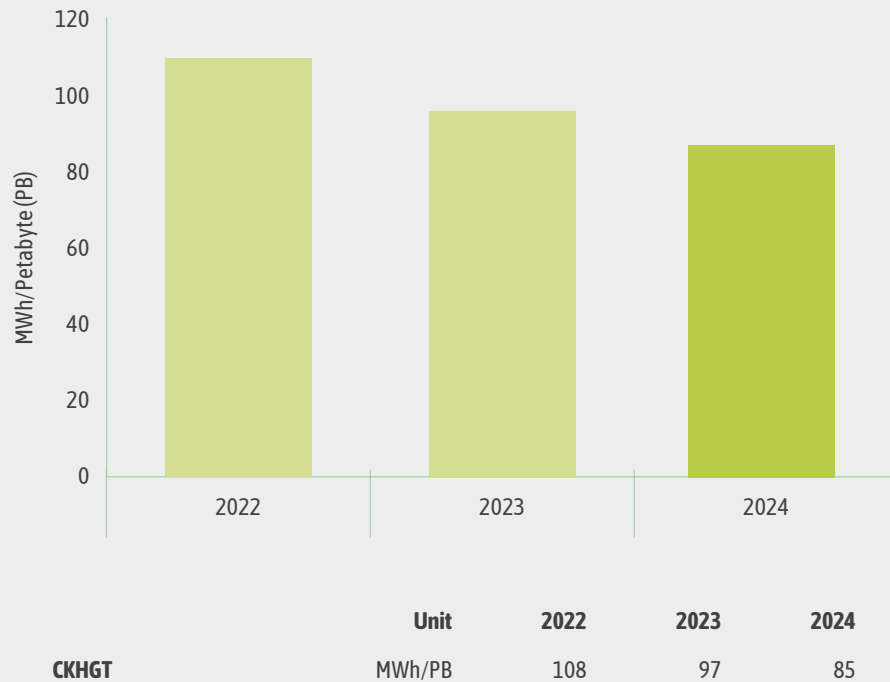[6] *Previously published in the CKHGT Sustainability Report 2023.*
[7] *A consequential change as a result of changes in scope 1 and 2 activity data.*
[8] *Using scope 2 market-based emissions.*

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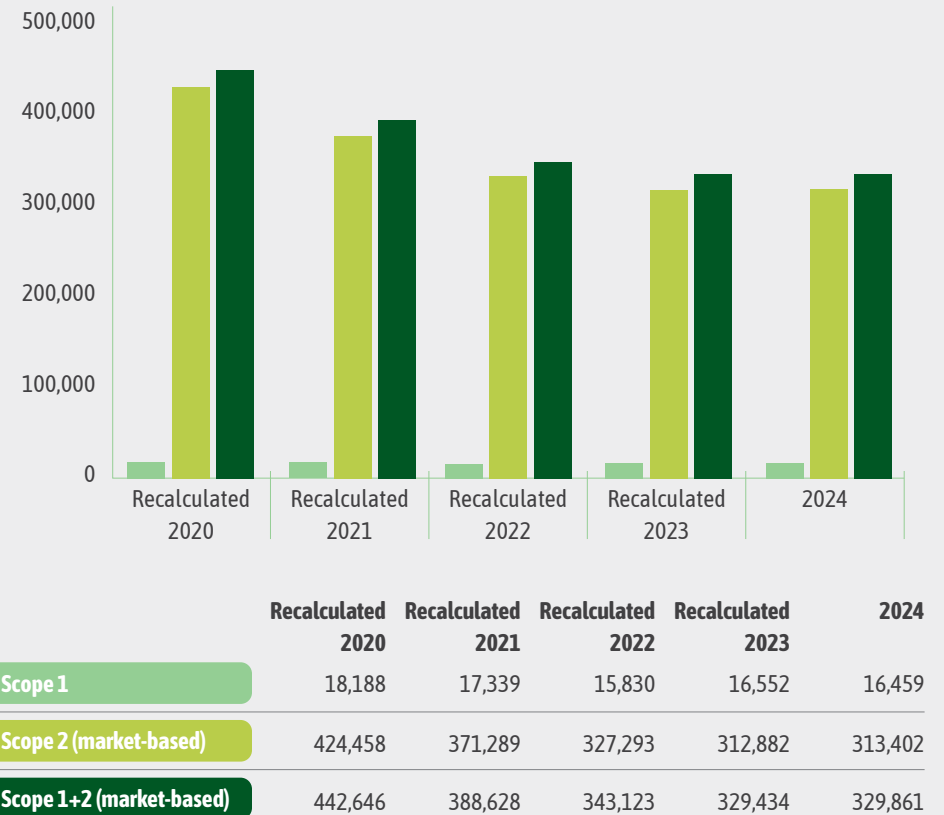
GHG FOOTPRINT AND PERFORMANCE

Total scope 1 and 2 emissions remained constant in 2024 as compared to 2023 and reduced by 25% as compared to the 2020 baseline GHG footprint (figure 11), ahead of a linear path towards CKHGT's scope 1 and 2 near-term science-based target. The limited year-on-year variance reflected the interplay of both external and internal dynamics. Externally, the electricity emission factors in several European markets increased due to shifts in their national electricity 'residual' mix—reversing some of the decarbonisation gains seen in previous years, while internally, electricity demand rose with the continued increase in data traffic along with associated deployment of advanced technologies and infrastructure upgrades across CKHGT.

Importantly, however, the energy intensity of networks has decreased over time (figure 10), reflecting investments that have increased the overall energy efficiency of CKHGT networks.

Additionally, CKHGT further increased the share of renewable electricity in its operations, effectively compensating for rising consumption, and progress was made in the electrification of the vehicle fleet, further supporting long-term decarbonisation efforts.

A full discussion of renewable energy procurement trends is provided in the section 'Increasing renewable electricity' page 38.

FIGURE 10: NETWORK ENERGY INTENSITY[9]

	Unit	2022	2023	2024
CKHGT	MWh/PB	108	97	85

FIGURE 11: CKHGT's SCOPE 1 AND 2 (MARKET-BASED) EMISSIONS PERFORMANCE (tCO$_2$e)

	Recalculated 2020	Recalculated 2021	Recalculated 2022	Recalculated 2023	2024
Scope 1	18,188	17,339	15,830	16,552	16,459
Scope 2 (market-based)	424,458	371,289	327,293	312,882	313,402
Scope 1+2 (market-based)	442,646	388,628	343,123	329,434	329,861

9   Network energy intensity has not been disclosed in previous reports. This metric is based on recalculated energy consumption values, as part of recalculations as described on pages 30 and 35.

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GHG FOOTPRINT AND PERFORMANCE

The key contributors to CKHGT's scope 3 carbon footprint (figure 12) were purchased goods and services and capital goods (77%).

This year CKHGT successfully extended its 'hybrid' approach to the calculation of 'spend-based' GHG emissions (i.e. emissions associated with capital and operational expenditure excluding devices) to the majority of business units. This methodology combines the use of environmentally-extended input-output (EEIO) emissions factors with a growing share of supplier-specific emissions data. The latter aims to capture more granular and representative emissions linked to actual supplier practices. As of 2024, over 10% of spend-related emissions were attributed to individual suppliers, representing a significant improvement in the quality and traceability of reported data. This data demonstrated an approximately 6% reduction in spend-based emissions from 2023 to 2024. Prior-year emissions have not been recalculated due to limitations in the availability of historical supplier emissions data.

Emissions from devices increased by 7% in 2024 compared to the previous year. This reflects increased device sales volumes, a slightly larger proportion of customer-premises equipment within the device mix (which inherently have a larger carbon footprint than mobile devices due to their constant grid connection), an increase in average emissions per mobile device - reflecting mixed performance by suppliers across the device portfolio, and an increase in average emissions per item of customer-premises equipment, due to the higher emissions factors associated with the relevant national electricity grid. Through supplier engagement, CKHGT understands that lower performance in mobile device lifecycle emissions is predominantly driven by emissions at the device component manufacturing stage. CKHGT continues to engage with its suppliers to encourage decarbonisation across the supply chain and to promote the use of lower-emission materials and manufacturing processes.

Additionally, category 11 emissions (use of sold products) increased, primarily due to an increase in the number of routers sold. As network-connected devices, routers contribute to scope 3 emissions through ongoing electricity consumption by end-users. CKHGT plans to explore countermeasures through engagement with manufacturers.

FIGURE 12: CKHGT's 2024 SCOPE 3 CARBON FOOTPRINT (tCO$_2$e)
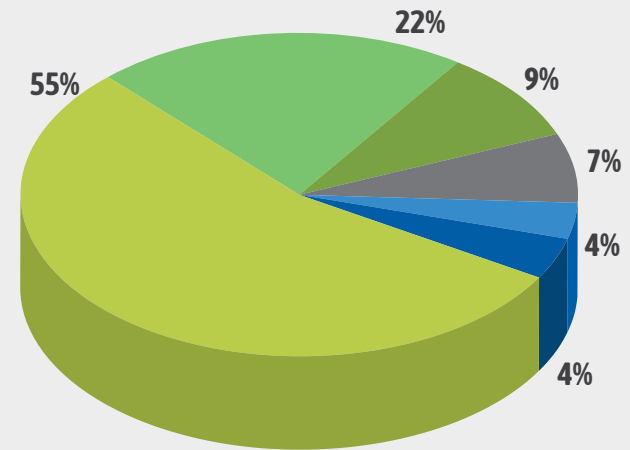
Cat.1: Purchased goods and services	674,951	55%
Cat.2: Capital goods	268,257	22%
Cat.3: Fuel and energy related activities	109,413	9%
Cat.11: Use of sold products	84,445	7%
Cat.15: Investments	44,652	4%
Other categories	50,298	4%
Total[10]	**1,232,016**	

[10] *Differences in the total as compared to composite data (including percentages) are due to rounding.*

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GHG REDUCTION STRATEGY

CKGHT has identified the following ten key GHG reduction opportunities:

RENEWABLE ELECTRICITY

Purchasing of renewable electricity, for example through power purchase agreements

Deploying of on-site solar

NETWORK ENERGY EFFICIENCY

Upgrading to more energy-efficient radio equipment

Implementing smart features for more efficient use of energy according to data traffic

Upgrading transmission networks including virtualising of core networks and network services

Decommissioning legacy networks and equipment

Upgrading data centre cooling equipment

Implementing AI-driven data centre energy optimisation tools

ELECTRIC VEHICLES

Transitioning company fleets to electric and incentivising employee use of electric vehicles

SUPPLIER ENGAGEMENT

Engaging with suppliers to enhance data quality and reduce value chain emissions

Increasing renewable electricity

Renewable electricity procurement forms a crucial part of CKHGT's overall transition plan. All business units are either already using a significant proportion of renewable electricity or are actively monitoring and assessing opportunities to increase the share of renewable electricity in their energy supply.
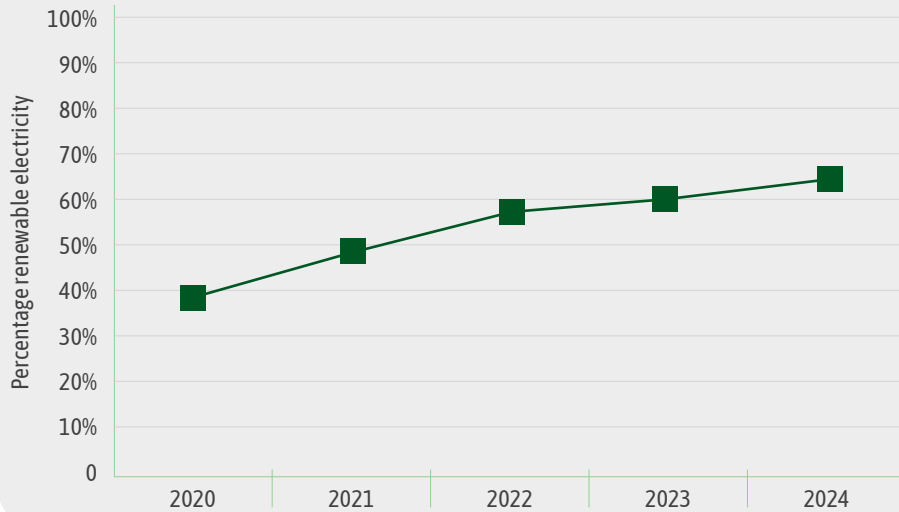
The availability and cost-effectiveness of renewable electricity varies widely across business units based on the renewable electricity resources available in-country, the suitability of grid infrastructure for supply of renewable electricity to demand centres, and regulatory and market conditions.

In 2024, CKHGT as a whole was supplied with 64% purchased renewable electricity, as compared to 61% in 2023 and 57% in 2022. **3** Ireland, **3** Austria achieved a supply of more than 95% renewable electricity, and **3** Denmark maintained 100% renewable electricity for a third year with renewable energy certificates from Danish wind and solar parks. **3** Austria plans to convert its remaining non-renewable electricity to renewable sources to over the next few years in line with its climate strategy.

3 Sweden achieved 88% renewable electricity consumption in 2024, up from 78% in 2023 and continues to target annual sourcing of 100% renewable electricity by 2025.

Wind Tre purchased energy attribute certificates, covering 47% of its electricity consumption - an increase from 41% in 2023, and is making steady progress towards its target of carbon neutrality by 2030. Given its high demand for electricity, Wind Tre will continue to explore longer term renewable electricity procurement opportunities in coming years. **3** UK achieved 84% renewable electricity in 2024 in total, including 100% of renewable electricity for the portion that is directly procured through its local utility arrangement.

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GHG REDUCTION STRATEGY

FIGURE 13: CKHGT RENEWABLE ELECTRICITY OVER TIME

FIGURE 14: CKHGT EUROPEAN BUSINESS UNITS - RENEWABLE ELECTRICITY 2024
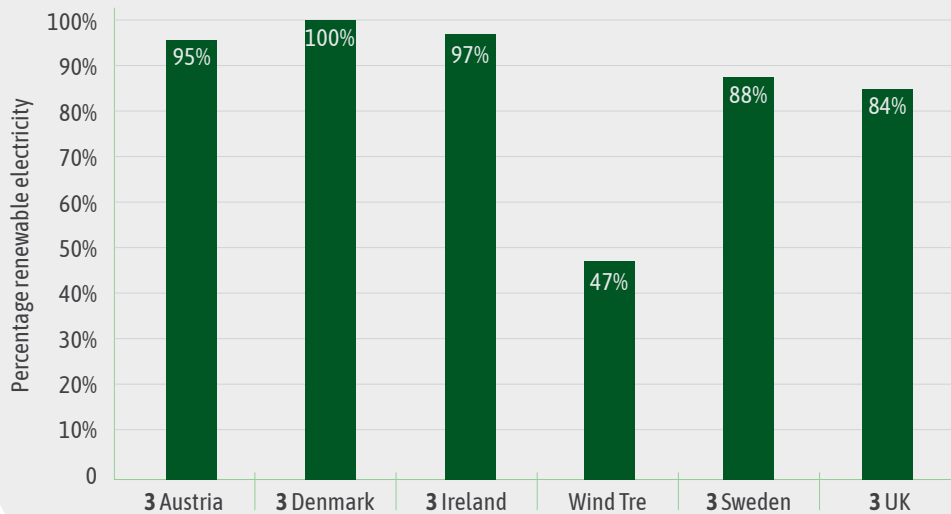
On-site renewable energy is expected to play a limited role in meeting telecommunications electricity demand, due to the large volume of electricity typically required by the network as compared to the generation capacity of a typical small-scale renewable energy plant. Nonetheless, on-site renewable energy forms part of CKHGT's overall approach to sourcing energy from renewable sources, where it is cost-effective and feasible, with over 1 GWh being self-generated from solar across Italy, Austria and Ireland in 2024. **3** Austria also successfully trialled the use of green hydrogen to power connectivity at Europe's largest open-air festival, as an alternative to the typical use of diesel generators in these circumstances.

SOLAR PV POWERING NETWORK INFRASTRUCTURE AT 3 IRELAND

In 2022, **3** Ireland embarked on a successful solar photovoltaic (PV) project, initially conducting a proof of concept on a limited number of network sites. Building upon this success, **3** Ireland expanded solar installations to an additional 90 sites in 2023 in conjunction with Cellnex, resulting in an installed capacity of approximately 470kW. Some sites now meet 6 to 10% of their power needs through PV and at certain times have been power-neutral on the electricity grid between 2pm and 4pm in the afternoon.

3 Ireland's solar-powered RAN base stations

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GHG REDUCTION STRATEGY

AUSTRIAN DEBUT OF GREEN HYDROGEN-POWERED MOBILE TRANSMITTER SYSTEM AT EUROPE'S LARGEST FREE OPEN-AIR EVENT

An emission-free generator, the 'H2Genset', Test-Fuchs GmbH

The Donauinsel is a long island on the Danube River that annually hosts 'Donauinselfest'- Europe's largest free open-air event. Traditionally, diesel-power mobile transmitters are used at this event due to the lack of power supply on the Donauinsel. However, in a pilot project, **3** Austria and Wien Energie powered a transmitter with green hydrogen, saving approximately 450 litres of diesel during the event.

The hydrogen-powered generator, the H2Genset from Test-Fuchs, emits no pollutants and only produces water vapour.

Increasing energy efficiency of the network

Over a number of years, in the transition to 5G as networks handle more data traffic, the significant programme of investment in leading edge network equipment has been an important driver of more energy efficient networks. This has included replacement of older, less efficient active network equipment and network energy management equipment, with new and more energy-efficient technology; and ongoing virtualisation of the core network and network services enabling the decommissioning of power-consuming network hardware.

Energy efficiency remains a high priority throughout the planning, development and operation of CKHGT mobile networks.

NEXT GENERATION NETWORKS AND ENERGY EFFICIENCY

5G is the fifth generation mobile network standard. It enables connectivity of machines, objects, and devices, at high speed, with ultra-low latency (minimal delay in sending or receiving the signal), greater reliability, and massive network capacity. The 5G standard is the first generation of mobile technology for which energy efficiency was considered as a design objective. 5G has the potential to be up to five times more efficient than 4G per gigabyte of data traffic, driven by the following features:

1 Given the massive data capacity of 5G, it is most efficient when being used in high-traffic conditions. It is also most energy efficient when deployed in 'standalone' mode – whereby data can be delivered by 5G technology end-to-end. Where it is deployed in 'non-standalone' mode, 4G is required as an 'anchor', thereby increasing the overall energy required.

2 5G is the first fully virtualised network technology – which means that the core network is run as software (in the cloud) instead of hardware, enabling more efficient use of physical infrastructure.

3 There is significant potential to use AI for real-time optimisation of the network (expected to reduce power consumption by up to 12% under current systems).

4 Along with 5G, there is an opportunity to deploy more energy-efficient equipment, such as a new generation of batteries and more efficient power amplifiers. Further savings can be achieved through implementation of enhanced equipment cooling, e.g. free cooling, which utilises the cooler outside air temperature rather than traditional refrigeration.

5 The benefits of 5G are further realised where legacy technologies are switched off.

While 5G technology offers energy efficiency improvements per gigabyte compared to legacy networks, the wavelengths used and specific use-cases of 5G will also need more sites and antennae, requiring active intervention to mitigate any associated environmental effects.

5G Advanced is the next major phase of 5G technology, with enhanced features that will likely enable applications that drive additional content, but will include smarter network optimisation and better resource allocation, therefore greater energy efficiency.

Looking ahead, 6G is expected to arrive during 2030 with network capabilities that will enable the promise of the cyber-physical world. It remains critical that the development of these standards embeds energy efficiency both from a network and device perspective to ensure alignment with the industry's net-zero goals.

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GHG REDUCTION STRATEGY

During 2024, business units continued to deploy AI-driven network hardware and software solutions enabling optimisation of network performance and energy efficiency, with new functionality tested and optimised on an ongoing basis. For example, at the end of 2023, **3** UK became one of the first major operators in the country to deploy Ericsson's award-winning energy-efficient dual-band Radio 4490, along with software that switches off radio capacity during low traffic hours. Wind Tre deployed and refined an AI-driven tool to dynamically redirect traffic so that certain equipment can be put into 'smart sleeping' mode, reducing overall energy consumption.

Furthermore, business units continued to implement 'free cooling' across base stations and other network sites where technically feasible. Free cooling uses external air to cool the equipment, reducing electricity consumption and refrigerant use as well as extending the lifecycle of air conditioners in use. Wind Tre already uses free cooling across major network sites and data centres, further to its major upgrade and consolidation programme that has taken place over multiple years. During the reporting period, **3** Austria continued to implement, test and monitor the effectiveness of free cooling on ten network sites, with results showing variability across sites and time of year but lower energy consumption overall. Testing will continue through 2025.

3 Denmark, **3** Sweden, **3** Austria and **3** UK all significantly progressed decommissioning of 3G capacity, further enabling the realisation of energy-savings following the deployment of next generation equipment. In **3** UK, 3G was deactivated across more than 79% of base stations by the end of 2024.

SMART AND SUSTAINABLE NETWORKS IN 3 UK

3 UK has achieved a major milestone in network sustainability by partnering with Ericsson to deploy AI-powered hardware and software solutions, aimed at improving energy efficiency. Over the past 18 months, as part of its network modernisation efforts, **3** UK has installed Ericsson's award-winning[11] energy-efficient dual-band Radio 4490, which uses less power and is 25% lighter than previous models, simplifying site access and upgrades.

The partnership has also introduced AI-driven software that autonomously switches off radio components during low traffic hours, improving energy efficiency by up to 70% at selected sites, while maintaining network performance. This initiative reduces GHG emissions of the network. Both **3** UK and Ericsson plan to apply these advancements in future projects to continue minimising the environmental impact of the telecommunications network.

ONGOING PROGRAMME OF ENERGY-SAVING AND NETWORK OPTIMISATION IN WIND TRE

In recent years, since the creation of the unified Wind Tre business, the mobile network has undergone an extensive programme of consolidation and upgrade to the latest generation of highly energy-efficient technology, with functionalities constantly tested and optimised across the network. Base stations have been equipped with free cooling, and an AI-driven tool has been deployed to redirect traffic so that equipment can be put into 'smart sleeping' at times of low data traffic.

In 2024, Wind Tre promoted and implemented numerous energy efficiency projects, with the aim of avoiding consumption of more than 15.5 GWh of electricity in 2024. Among these projects was the launch of an Internal Energy Audit to monitor and improve energy efficiency across technological sites, with improvements to infrastructure enabling a significant reduction in the energy requirements of cooling systems.

MODERNISATION AND DECOMMISSIONING ACHIEVING ENERGY EFFICIENCY AT 3 SWEDEN

At **3** Sweden, a combination of modernised equipment, implementation of power-saving network equipment features, and decommissioning of 3G, has reduced energy consumption from 214.7 kWh / terabyte of data in 2021, to 142.1 kWh / terabyte in 2024. **3** Sweden expects to fully phase-out of 3G by the end of 2025.

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[11] *Ericsson won the Red Dot Product Design Award for energy-efficient radios in 2023.*

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GHG REDUCTION STRATEGY

AI-ENERGY SAVING INNOVATION IN HONG KONG

HTHKH continues its ongoing efforts to enhance energy efficiency through adoption of RAN energy-saving features, reconfiguration of selected base stations to implement free cooling, deployment of highly efficient all-weather base station equipment for new outdoor sites and intelligent energy-saving solutions for greater use of sleep mode during low-traffic periods, while still maintaining high quality mobile network services.

In 2024, HTHKH and Huawei signed a memorandum of understanding (MoU) at the Mobile World Congress in Barcelona. The MoU focuses on a 5.5G green strategy collaboration, where HTHKH will adopt Huawei's AI energy-saving solution to enhance the energy efficiency of 5G base stations in Hong Kong. This initiative aims to achieve a 'zero bit, zero watt' energy-saving goal and reduce CO_2 emissions equivalent to about 1,000 flights between Hong Kong and Barcelona.

DATA CENTRE ENERGY AND WATER SAVINGS IN 3 AUSTRIA

3 Austria has implemented the power monitoring software 'struxureWare DataCenter Expert' from Schneider Electric to actively monitor and optimise power consumption at three locations. In 2024, the company completed the replacement of cooling equipment in data centres with 'adiabatic coolers' - closed-loop ambient air water cooling systems which have a higher heat transfer efficiency, achieving energy-savings of more than 10%, and expected to achieve approximately 10,000m^3 of water-savings per year.

Energy efficiency in contact centres and offices

CKHGT also continues to invest in energy-efficient upgrades for contact centres and offices. Wind Tre has installed motion sensors for lighting in office premises and building automation systems to regulate the use of air conditioning according to the external temperature. 3 Ireland has upgraded lighting and lifts in its Limerick contact centre yielding a 16% energy-saving for that site. 3 Austria has installed energy management equipment at its head office and is upgrading regional offices with motion sensors, automated LED lighting, and automated heating and air conditioning. 3 Denmark headquarters include automation technologies for energy efficiency including weather sensors, motion sensors and energy-efficient lighting.

REDUCING EMISSIONS AND ENVIRONMENTAL IMPACT OF OFFICES IN 3 IRELAND

3 Ireland is implementing a robust sustainability strategy to reduce emissions and environmental impacts across its Dublin and Limerick offices. In Dublin, upgrades include replacing boilers, implementing smart variable-speed water pumps, and belt-driven fans in air handling units with direct-drive fans. The Limerick office underwent a full lighting upgrade to energy-efficient LED systems, replaced 30-year-old lifts with modern energy-efficient alternatives, and established a pollinator-friendly wildflower garden to support biodiversity. Planned improvements for 2025 include a full air-conditioning replacement to further enhance energy efficiency. These efforts have already delivered measurable results, such as a 16% reduction in lighting energy consumption and saving 34,000 single-use cups through a reusable cup initiative. Additionally, 3 Ireland is promoting sustainable employee commuting with electric vehicle charging points, a bike-to-work scheme, and bike parking facilities, contributing to a greener workplace culture.

Replacing fleet with electric vehicles

During the reporting period, business units continued to progress their transition to a lower-carbon vehicle fleet through the adoption of electric vehicles. As at the end of 2024, Wind Tre had converted 35% of its car fleet to electric or hybrid vehicles. 3 Sweden reached 81% of fleet as electric or hybrid, surpassing its target to have 70% electric or hybrid vehicles by 2025, and 3 Ireland had converted approximately 60% of its vehicle fleet to electric vehicles. 3 Austria had converted almost 50% of its fleet to electric vehicles and is targeting a majority electric vehicle fleet by the end of 2027. 3 Austria also hosts one of the largest electric vehicle charging parks in the city of Vienna, enabling the simultaneous charging of 50 vehicles.

Employee incentives to encourage more sustainable transport options have also been introduced. 3 UK and 3 Ireland offer the 'cycle to work' employee benefit scheme, enabling employees to more cost-effectively purchase a new bike for commuting, and 3 Denmark employees are incentivised with an employee discount on use of the local public transport for travelling to and from work. From 2024, 3 Austria employees can access bicycle leasing at a reduced rate.

3 UK is working with its third-party logistics partner to increase electrification and therefore reduce emissions in 'last mile delivery'. In 2024, 37% of 3 UK's consumer deliveries were made by electric vehicles resulting in the reduction of approximately 100 tonnes of CO_2e.

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GHG REDUCTION STRATEGY

Engaging with suppliers

CKHGT views supplier engagement as a key enabler of its climate goals and a powerful lever for broader positive impact. By actively working with suppliers, CKHGT aims to ensure that its value chain is aligned with its environmental commitments and that suppliers share a common vision for a low-carbon, sustainable future.

Purchased goods and services and capital goods are the most significant categories within CKHGT's scope 3 emissions footprint. As such, CKHGT is prioritising suppliers according to materiality, and improving data quality such that emissions reductions in the value chain can be reflected in our scope 3 emissions performance.

Device purchases contribute 22% of CKHGT's scope 3 GHG footprint and are measured using LCA data sourced from device suppliers. In 2024, CKHGT continued to engage with device suppliers, directly requesting LCA data to support its analysis. CKHGT increased LCA coverage for device purchases by 70% in 2024 as compared to 2023, positioning more effectively to reflect emission reductions as device footprints improve over time. For the remaining devices, where supplier-specific data was not available, CKHGT used representative averages based on model, supplier, and device type to maintain consistency and completeness in its reporting. CKHGT will continue to engage on enhanced data availability and supplier strategies to reduce the GHG footprint of devices.

CKHGT participated in the 2024 disclosure cycle as a member of CDP Supply Chain, inviting over 330 suppliers across its business units, including key global vendors and roaming partners, to disclose through CDP. Recognising the varying levels of readiness for environmental disclosure, CKHGT conducted targeted workshops in partnership with CDP, for those suppliers who had not previously reported to CDP. This first engagement resulted in 160 supplier responses. The data disclosed by participating suppliers enabled more accurate GHG accounting, allowing CKHGT to base emission calculations on supplier-specific data rather than relying on industry averages. Further, insights from these disclosures suggested encouraging trends:

- A vast majority of respondents indicated they have board-level oversight of environmental matters, suggesting strong governance structures.
- The majority of reporting suppliers noted a reduction in emissions as compared to their previous disclosure, highlighting climate action taking place across the supply chain.
- Approximately 75% of respondents had already set decarbonisation targets, underscoring a shared ambition for climate responsibility.

CKHGT remains committed to expanding the reach and impact of its supplier engagement and will continue to enhance its supplier programmes in 2025, with a particular focus on reaching those without GHG data disclosure or reduction targets. CKHGT also acknowledges its role as a mentor and catalyst, particularly for smaller suppliers who may be at earlier stages in their sustainability journeys. Ongoing dialogue and support will be a key focus of CKHGT's efforts to bring more partners onboard.

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PROMOTING A CIRCULAR ECONOMY

- **END-OF-LIFE PRODUCT MANAGEMENT AND REFURBISHED DEVICES**

- **ECO-DESIGN**

- **CIRCULAR NETWORKS**

- **REDUCING WASTE IN BUSINESS OPERATIONS**

- **MEASURING THE GHG IMPACT OF CIRCULARITY INITIATIVES**

> **The ubiquitous use of mobile phones and routers across the world, with 9 billion smartphones[1] and feature phones projected globally in 2030, brings associated environmental and social impacts from raw material extraction, processing, production and disposal. CKHGT supports the GSMA's vision for 2050: 'a future where devices have as long a lifetime as possible, where they are made with 100% recyclable and recycled content using 100% renewable energy and where no device ends up as waste'. CKHGT recognises and supports the GSMA's waste hierarchy[2] and is working to increase circularity through end-of-life product management, eco-design, measures to extend the life of products in use, and reduced waste in operations.**

END-OF-LIFE PRODUCT MANAGEMENT AND REFURBISHED DEVICES

Device consumption is a significant contributor to e-waste, and a considerable portion is disposed of outside of formal waste management systems. Where specific regional data is available, official take-back rates of mobile phones rarely exceed 15%[3].

At the same time, there is growing demand for refurbished devices with more people prioritising affordability and environmental responsibility. The global market for pre-owned smartphones surged to 309 million units in 2023[4], with a forecast compound annual growth rate (CAGR) of 7.4% over the period 2024-2032 and a projected market value of over $120 billion in 2032[5].

Business units have programmes in place for repair of faulty or damaged devices within warranty, or for refurbishment and resale dependent on condition, typically working with specialist partners. For example, Wind Tre provides a comprehensive after-sales service for fixed and mobile devices, offering repairs through its network of over 500 stores and 3 Austria works with an authorised local partner for repair, refurbishment and resale of mobile devices and routers.

Most of CKHGT's major markets have device take-back or trade-in arrangements in place – in many cases taking devices originally sold by any retailer. 3 UK and 3 Ireland launched 'integrated' trade-in offers during the reporting period – for the first time allowing in-store returns in exchange for new technology and discounts towards the purchase of new technology as an alternative to cash. Partnerships are in place to support the refurbishment and reuse of taken-back devices where possible, extending their life and reducing the need for new production. Devices that cannot be repaired or refurbished are responsibly recycled.

In 2024, over 140,000 devices were taken-back overall (not including donations) across CKHGT markets, a 9% increase from 2023.

CIRCULAR BUSINESS MODELS DRIVING VALUE FOR CUSTOMERS IN 3 UK

In 2024, 3 UK introduced an integrated trade-in programme allowing customers to exchange their old devices such as phones, tablets, or smartwatches for discounts on new technology or cash sent directly to their bank accounts.

3 UK also updated its Waste from Electrical and Electronic Equipment Device Takeback and Battery Disposal Guidance to better educate its retail employees on the recycling and re-use options, both for electrical products used within stores and devices returned by customers.

Aiming to meet the growing consumer demand for refurbished devices, 3 UK launched 'Like New' refurbished devices, with all phones going through a 65-point quality check to ensure they achieve a grade A 'excellent' classification and offering a 36-month or 12-month warranty depending on the plan selected by the customer.

3 UK continues to offer its 'Reconnected' scheme which enables devices less suited to resale to be considered for donation, with approximately 18,000 phones donated since the programme was launched in 2017.

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[1] GSMA, '*Strategy Paper for Circular Economy: Mobile Devices*'.
[2] GSMA, '*Making circularity work*'.
[3] GSMA, '*Making circularity work*'.
[4] Digitalisation World, '*Demand for refurbished smartphones grows*'.
[5] Persistence Market Research, '*Refurbished and Used Mobile Phones Market Size and Share Analysis*'.

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END-OF-LIFE PRODUCT MANAGEMENT AND REFURBISHED DEVICES

Launched by **3** Denmark and **3** UK in 2024, as well as **3** Sweden and Wind Tre in previous years, the circular business model of refurbished devices offer customers a more cost effective and sustainable alternative to new devices, and meeting the demand in this segment. For example, Wind Tre's sub-brand VERY mobile continued its partnership with Refurbed to offer a range of refurbished phones, with software licence and 12-month warranty, and the WINDTRE brand continued to offer refurbished devices to customers, together with Enjoy – its partner since 2022. **3** UK's brand Smarty also continued its partnership with Reboxed, launched in 2022, offering refurbished mobile devices.

A number of business units are also exploring more sustainable models of device ownership such as device leasing, and are already offering router leasing. **3** Sweden continued to offer a device-as-a-service model to business customers, further enabling device refurbishment, reuse and recycling.

CIRCULAR BUSINESS MODELS IN 3 SWEDEN

3 Sweden offers '3Återvinn', accepting the return of devices such as routers, mobile phones, tablets and smart watches, for reuse or recycling. Customers returning smartphones receive a discount on their existing mobile subscription – which makes the service beneficial from a cost and a sustainability perspective. The proportion of devices reused increased from 94% in 2023 to 96%, with the remaining 4% recycled.

3 Sweden continued its circularity service '3Leasing' (a device-as-a-service model) to business customers. This model offers customers more flexibility and lower costs with device trade-in value reflected in monthly payments. Returned devices are refurbished and reused or recycled at the end of the lease period.

3Återvinn - smart choice for a circular society

LAUNCH OF REFURBISHED PHONE OFFER IN 3 DENMARK

In 2024, **3** Denmark launched its '3LikeNew' initiative, now offering refurbished phones to both private customers and businesses. This programme allows retail and business customers to purchase refurbished phones at a lower cost. The phones are provided by partner Foxway, who also refurbishes and recycles devices for **3** Sweden. The refurbished phones come with warranties and are classified as 'grade B', meaning they may have minor cosmetic imperfections but retain at least 80% of their original battery life.

The expansion comes in response to increasing demand for recycled devices, with a survey commissioned by **3** Sweden showing that 43% of respondents, especially younger customers, are considering buying used phones.
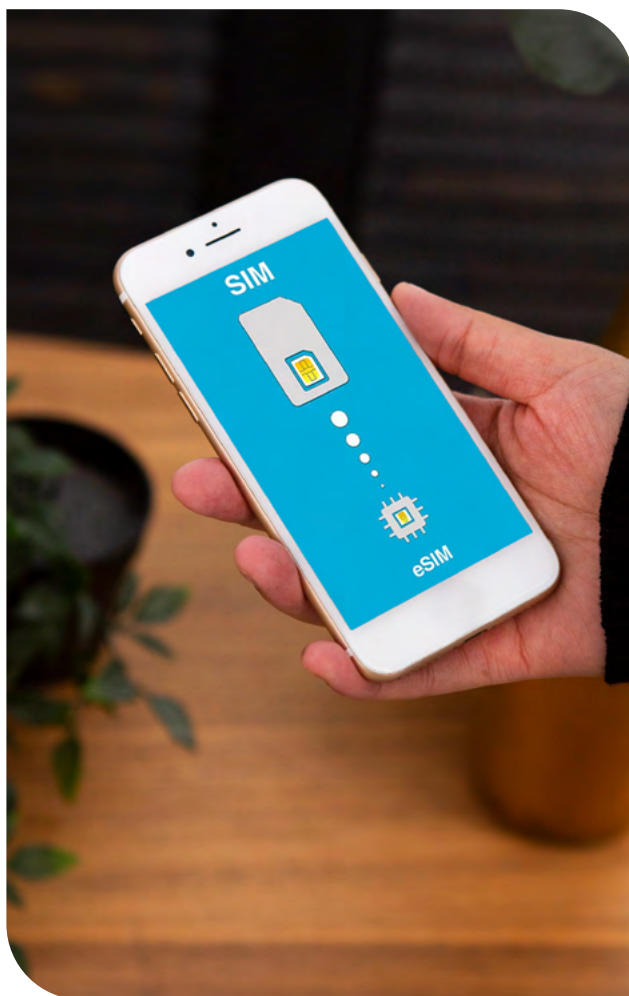

ONE-STOP HANDSET RECYCLING SERVICE IN HTHKH

HTHKH's Hong Kong operations offer a one-stop handset recycling service at selected retail stores, enabling customers to contribute to environmental protection through the Recycling Handsets and Accessories Programme. Under the programme, customers can dispose of old or unwanted handsets and accessories (such as batteries, chargers, headphones, earpieces, USB cables and stylus pens) in recycling boxes in selected 3Shops.

Items collected under this programme are passed on to the Computer and Communication Products Recycling Programme run by the government with industry partners and voluntary organisations. Equipment still in working condition is refurbished and donated to people in need, while other parts and useful materials are recycled.

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ECO-DESIGN

Business units are engaging with device suppliers on sustainability and eco-design of products and packaging of devices and accessories. This includes discussions on issues such as repairability and durability of devices, recyclable and recycled content, material and waste minimisation, and GHG emissions embedded in the product lifecycle through the production process.

They are also adding sustainable accessories to the product portfolio. **3** UK, **3** Ireland, **3** Denmark and **3** Sweden offer a range of sustainable mobile accessories for example made of full-grain leather or recycled plastic materials, or through 100% carbon neutral production. **3** UK continues its partnership with Tech21 offering cases made with Bio-Spice™, a proprietary material that makes the plastic 100% biodegradable. **3** Denmark has introduced 'Panzer Glass Matrix' on-screen protection for the Samsung S24 family, made from 100% recycled plastic.

The 'SIM', or 'subscriber identity module', is also a key opportunity for reducing waste and increasing circularity. Although SIMs are small in size, their volume and therefore overall impact across their lifecycle can be considerable. In recent years, CKHGT has innovated through its partnerships to reduce the size of the surrounding SIM card and introduced SIM cards made with more sustainable materials and processes. Wind Tre, **3** Sweden, **3** Denmark, **3** Ireland and HTHKH partner with Thales to offer SIM cards made from 100% recycled plastic. Across CKHGT, this type of SIM card represented 45% of all physical SIMs issued, and over 74% of physical SIMs issued in Italy, Ireland, Austria and Denmark. In HTHKH, most SIM cards are issued without packaging, and printed with QR codes linked to online information, thereby reducing paper.

CKHGT anticipates that the eSIM offers a more sustainable alternative to the physical SIM over the longer term. An eSIM enables the delivery of a digital profile to a chip on the device, without a physical SIM card. This gives more flexibility and choice to customers while reducing plastic, emissions and electronic waste in cases where it replaces a physical SIM, for example in mobile devices and fixed wireless access routers.

Throughout 2024, CKHGT business units invested in enhancements to eSIM infrastructure and sales platforms, and scaled eSIM penetration in collaboration with key device suppliers in Europe. CKHGT runs an eSIM Strategic Working Group across business units to share eSIM best practices and support growth. **3** Austria continued to offer the 'eSIM only' mobile communications subscription 'up³'.

> **"**
> **Business units are engaging with device suppliers on sustainability and eco-design of products and packaging of devices and accessories. ""**

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CIRCULAR NETWORKS

Like all major mobile operators, upgrades to latest generation technologies lead to a considerable amount of waste – often containing critical raw materials such as gold and copper. Business units have individual arrangements for maximising circularity and responsible disposal of network equipment, which include maximising revenue streams from resale of parts or materials, and recycling.

For example, Wind Tre prioritises the resale of network equipment through vendor buy-back arrangements, and recycles unsold equipment for recovery of materials such as tin, lead, silver and gold. **3** Austria has a process for dismantling and logging equipment parts for routers and network parts in a dedicated warehouse management tool, before reusing parts internally where possible, and otherwise recovering materials through responsible disposal.

3 UK and **3** Ireland have targets aiming for 100% of decommissioned network equipment being reused or responsibly recycled. Both business units have established reuse and recycling partnerships to support the achievement of these targets.

PIONEERING LEAD ACID BATTERY RECYCLING IN HTHKH

Since 2023, HTHKH has participated in the Green Friends initiative, led by Hong Kong Battery Recycling Centre Limited. This initiative marks the first licenced facility in Hong Kong for the local recycling of waste lead-acid batteries, ensuring compliance with relevant regulations and guidelines. The facility, capitalising on advanced technologies to recycle and re-purpose over 90% of all collected batteries, exemplifies a strong commitment to sustainable practices and minimising environmental impact.

In 2024, HTHKH's Hong Kong operations successfully recycled all damaged and aged lead-acid batteries through this facility, amounting to 21 tonnes.

REDUCING WASTE IN BUSINESS OPERATIONS

The reduction of waste in other parts of CKHGT business operations, and diversion of waste from landfill to more sustainable waste management methods, are also priorities across business units. This includes a focus on sustainable logistics, measures to reduce paper-based documentation, and improved waste segregation.

In 2024, **3** UK, already a 'zero to landfill business', started a new project of enhanced site waste segregation, sending a larger proportion of waste to recycling rather than energy recovery, contributing to a 20% increase in retail store recycling rates since the beginning of 2024. HTHKH has a target to achieve a recycling rate of 35% for general office waste produced by its Hong Kong operations by 2030. **3** Ireland has transitioned to paperless billing, with the vast majority of customers choosing this option and reducing paper use by 78%.

3 Austria continued to enhance the sustainability of its logistics programme, and held workshops to educate employees about the importance of waste management and waste sorting.

SUSTAINABLE AND DIGITAL LOGISTICS IN 3 AUSTRIA

3 Austria is committed to operating carbon neutral, digital and plastic-free logistics. The business reuses inbound shipping cardboard boxes, which are made of 70% recycled materials, for onward distribution to retailers with excess quantities collected, pressed and resold as recyclable material. In 2024, it introduced a new filling material that is made from recycled paper as well as being suitable for onward recycling. **3** Austria has also removed paper-based documentation for delivery notes, contracts and correspondence. Its digital processes save over half a million pages of paper per year due to the elimination of delivery notes alone. Any electronic waste is resold to dealers via a certified disposal company. In addition, non-recyclable filling paper (to protect device contents) has been replaced with a recyclable alternative.

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MEASURING THE GHG IMPACT OF CIRCULARITY INITIATIVES

CKHGT has for the second year applied emerging methodologies to reflect the lifecycle GHG reduction benefit of circularity initiatives. During the year, CKHGT participated in a GSMA working group to develop a whitepaper on the business case for circularity in the mobile phone industry, and to release a tool for the calculation of lifecycle emissions of refurbished phones, with which CKHGT's calculation methodology is consistent.

Emissions factors for refurbished devices were leveraged from LCA calculations conducted by ADEME, the French Agency for Ecological Transition[6], according to the ISO 14040:2006 standard. This analysis replaced emissions from the device lifecycle stages of raw materials and manufacturing of new devices, with those related to parts replacement only. It also reflected the typical transportation of refurbished devices from Europe for second life, as compared to Asia for first life. Applying these emissions factors, the full lifecycle emissions (including use phase) associated with CKHGT refurbished devices sold were 88% lower overall than if the sold devices had been new.

CKHGT also collaborated for the second year with its main supplier of SIMs to source LCA emissions factors relevant for a portfolio of over 20 million SIM cards, with emissions factors varying per SIM card type, material, manufacturing location (table 4). In 2024, with a 4% increase in the share of SIM cards produced at sites associated with a lower emissions footprint and a 23% increase in share of SIM cards made from recycled refrigerators, as compared to 2023, the average emissions per physical SIM card decreased by approximately 14% year-on-year.

Table 4: LCA factors of SIM cards (gCO$_2$e) as provided by SIM supplier

Manufacturing Location	Size	Material	
		ABS (acrylonitrile Butadiene Styrene, thermoplastic polymer)	Recycled plastic from refrigerators
Central America	ISO[8]	92.2[7]	79.0
Central America	Half-ISO[9]	63.6	54.4
Europe	ISO	65.3	31.5
Europe	Half-ISO	38.7	29.9

CKHGT is monitoring emerging research on the emissions footprint of eSIMs to ensure that the full lifecycle of these products is properly covered. According to currently available information, CKHGT understands that eSIMs have been assessed as having approximately 97% lower emissions than standard physical SIMs[10].

Overall, CKHGT's circularity initiatives demonstrated a 59% reduction in emissions across CKHGT's SIM/eSIM portfolio in 2024, compared to emissions that would have occurred through sale of reference physical SIMs.

The combined effect of all these circularity initiatives applied to devices, SIMs and eSIMs has led to a reduction of 233 tCO$_2$e in 2024 compared to the volume of emissions that would have occurred through sale of new phones and reference physical SIMs.

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6   ADEME, '*Assessment of the environmental impact of a set of refurbished products*'.
7   *CKHGT default reference SIM for the purpose of calculations.*
8   *ISO ID-1 standard format (86 x 54 mm).*
9   *Half ISO ID-1 standard format (43 x 54 mm).*
10   *https://www.gi-de.com/en/digital-security/connectivity-iot/mobile-network-operator/esim-management/green-esim.*

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CREATING GREAT PLACES TO WORK

- **TALENT ATTRACTION AND RETENTION**
- **PROMOTING WORKFORCE DIVERSITY AND INCLUSION**
- **EMPLOYEE LEARNING AND DEVELOPMENT**
- **EMPLOYEE WELLBEING**

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CKHGT is an employer of more than 17,350 people. It has comprehensive strategies in place across its markets to achieve workplace excellence and leading employee propositions, tailored to local circumstances. Each business operates within the robust framework of CKHH policies, including for example the CKHH Code of Conduct and the CKHH Whistleblower Policy. In 2024, business units continued to invest in the employee experience, receiving recognition across all markets.

EMPLOYER OF CHOICE: WORKPLACE-RELATED RECOGNITION AND CERTIFICATIONS ACHIEVED IN 2024

3 SWEDEN

- Top 10 'Sweden's Best Workplaces' by Great Place to Work® for 10th year in a row.
- 'Career Company 2024' by independent organisation Karriärföretagen for 12th year in a row.
- Third place in Magnet Awards for TikTok campaign aiming to attract more females to 3 Sweden.
- Second place in the Employer Branding category of the Branding Swedish Content Awards for its TikTok 'Livet på Tre' (Life at 3) which aims to attract new employees.

WIND TRE

- Top Employer Italy 2024 for the 7th consecutive year, recognised by the Top Employer Institute for its excellence in the development and wellbeing of people.
- Diversity Leader in Europe 2024 by Statista and the Financial Times for its inclusive business practices.
- EQUAL-SALARY Certification 2024 from the EQUAL-SALARY Foundation.
- UNI Pdr 125 Certification – a national certification that promotes and protects diversity and equal opportunities in the workplace.
- TOP JOB in the study 'Top Job – Italy Best Employers' by the German Institute for Quality and Finance.

3 UK

- Level 1 of the UK Government-led Disability Confident Employer awarded by HR UK.
- Highly Commended: Best use of benefits to support diversity, equity and inclusion at the Employee Benefits Awards.
- Talent and Attraction Team of the Year in the HR National Awards (Scotland).

3 IRELAND

- The only telecommunications provider in Ireland to achieve the Investors in Diversity Gold mark for 2023-2025.
- Shortlisted for the Diversity and Inclusion Award at the Chambers Ireland Sustainable Business Impact Awards.
- 10th best employer of 2024 in Ireland in the Irish Independent's Best Employer's list and fourth in the Tech Industry list by the Irish Independent.
- 'Excellence in Health and Wellbeing' from Chambers Ireland Sustainable Business Impact Awards – Chambers Ireland.
- 'Best Workplace Diversity Strategy' at HR Leadership and Management Awards by Event Strategies Ltd.

HTHKH

- Asia's Best Employer Brand in the 15th Asia's Best Employer Brand Awards organised by Employer Branding Institute and World HRD Congress and Star of the Industry Group.
- Good MPF Employer Award by the Mandatory Provident Fund Schemes Authority.
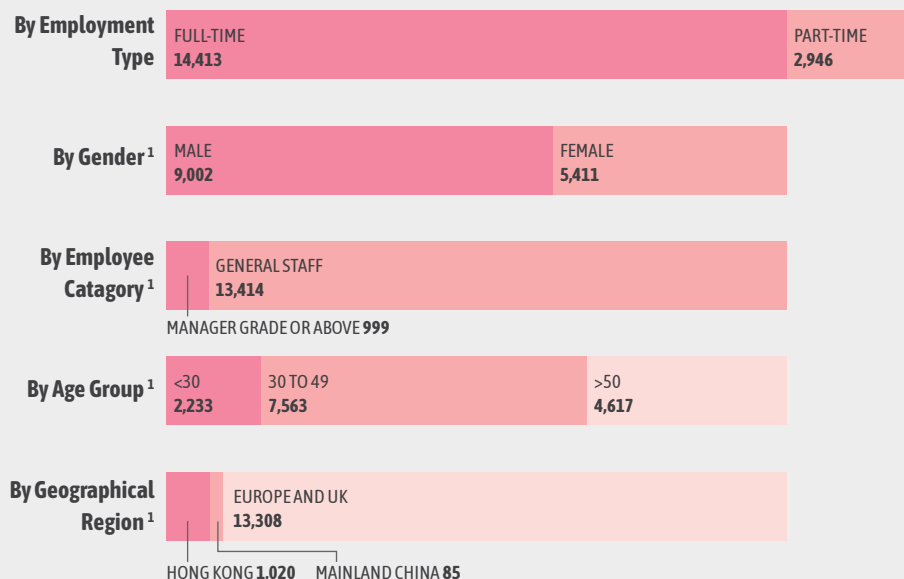
3 AUSTRIA

- 'Work and family' certification by the Federal Ministry of Women, recognising 3 Austria as a 'family-friendly employer'.
- 1st place 'Employee Experience Champion' by LSZ in collaboration with Maximilian Lammer consultancy, recognised for its working environment, culture, and employee digital experience.
- 'Top company seal' from Kununu for the third time consecutively, reflecting ratings from current and former employees.
- The 'equalitA' seal of approval for industrial promotion of women – the Austrian Federal Ministry for Digital and Economic Affairs.
- Diversity Leaders Award by Sheconomy.

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TALENT ATTRACTION AND RETENTION

FIGURE 15: NUMBER OF EMPLOYEES

TOTAL 17,359

By Employment Type
FULL-TIME 14,413 | PART-TIME 2,946

By Gender [1]
MALE 9,002 | FEMALE 5,411

By Employee Catagory [1]
GENERAL STAFF 13,414
MANAGER GRADE OR ABOVE **999**

By Age Group [1]
<30 **2,233** | 30 TO 49 **7,563** | >50 **4,617**

By Geographical Region [1]
EUROPE AND UK 13,308
HONG KONG **1,020**   MAINLAND CHINA **85**

[1] *Full-Time Only*

Business success relies on the ability to attract and retain talent across a range of skillsets, including specific technical skills. As such, CKHGT aims to create workplaces that attract and retain diverse talent, recognising the importance of diverse perspectives and experience in the workplace. It does so by engaging with its employees to create an open feedback culture, creating inclusive and diverse workplaces, providing pathways for learning and development to support employee professional growth and supporting employees in their wellbeing. Each business unit designs and implements fit-for purpose human resources management approaches aligned with these outcomes and tailored to their respective needs.

Employee engagement and feedback

An important aspect of creating great places to work is understanding and responding to employee feedback. This requires timely, data-driven insights to inform action plans, which are implemented and updated as circumstances and performance changes.

Reflecting this, all CKHGT European business units conduct confidential and anonymous employee engagement surveys (twice-yearly at a minimum and for some more frequently) covering topics such as motivation, culture, leadership and personal development. Senior management reviews this feedback to understand strengths and issues highlighted by employees, and to plan improvement actions. Managers also discuss findings and potential changes with their teams.

In 2024, **3** Ireland and **3** UK achieved strong survey participation rates of 79% and 81%, with employee engagement scores of 70% and 77% respectively. Wind Tre's biannual engagement survey, '#diciamolanostra' (meaning 'let's have our say'), continued to have strong participation from employees and an engagement rate of 84% in 2024, confirming positive feedback on aspects such as personal fulfilment, inclusion and a business strategy that inspires confidence.

Following the feedback from previous employee engagement, **3** Denmark changed from an annual to a quarterly employee survey satisfaction survey. Similarly, **3** Sweden conducts quarterly employee surveys and holds regular follow-up meetings.

Employee engagement surveys are complemented with ad hoc surveys on individual topics. For example, during the year, **3** Austria conducted a company-wide survey on employee wellbeing and commitment.

In addition to formal engagement surveys, all business units engage with employees through multiple channels such as 'Town Hall' meetings, employee fora or 'resource groups' and internal newsletters.

Town Hall meeting at HTHKH

For example, **3** UK and **3** Ireland each have an Employee Forum - a group of employees selected to represent their department and serve as a contact point through which employees can share feedback with senior leadership. The Employee Forum meets quarterly with the Chief People Officer and other members of the Executive and Senior Leadership Teams to share employee feedback, monitor progress against action plans, and ensure that the employee voice is heard when making key decisions.

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TALENT ATTRACTION AND RETENTION

Talent attraction

Each business unit identifies skills gaps and labour needs within its local market and implements dedicated strategies to attract talented candidates. These included targeted and innovative recruitment campaigns, competitive employment benefits, apprenticeships and internships, along with other leading graduate development opportunities (discussed in more detail under 'employee learning and development') to attract candidates with the required level of technical and soft skills. Many programmes include a focus on women to address the gender imbalance in technology-based careers and to maximise the talent pool available.

Benefits packages are comprehensive, as part of a leading employee value proposition. These include maternity and shared parental leave provisions, substantial childcare support and educational assistance programmes. Employees benefit from competitive pension plans, performance-based bonuses and long-service recognition as well as staff discount schemes and wellness initiatives.

3 SWEDEN REVERSES THE RECRUITMENT PROCESS

3 Sweden reversed the traditional recruitment process, allowing job-seekers to interview potential managers instead of the usual format. As part of its 'Choose a Nice Boss' campaign, 3 Sweden created election-style posters with messages reflecting its corporate culture. Job-seekers had the opportunity to interview 3 Sweden's managers in a designated voting booth. This initiative highlights the importance of supportive leadership in fostering an inclusive work environment.

'Choose a nice boss' campaign

CROSS-BORDER RECRUITMENT IN 3 AUSTRIA

In 2024, 3 Austria expanded its talent attraction efforts through cross-border recruitment campaigns for information technology employees, providing benefits such as full remote-working and relocation support. It also introduced apprenticeship programmes, including a new programme aiming to recruit young professionals into mathematics, information technology, natural sciences and technology (MINT) roles.

INTERNSHIPS FOR TRANSITION TO THE WORKFORCE IN WIND TRE

Wind Tre's OnStage internship programme is designed to support young graduates and undergraduates as they transition into the workforce, offering a 6-month internship across various divisions. The programme, now in its 9th edition, includes stages such as Welcome Day, online group activities, and sessions focused on key company values and skills such as decision-making and emotional intelligence. It culminates in a Graduation Day where interns and tutors provide final feedback. Additionally, Wind Tre offers the New Generation Programme for recent graduates, focused on personal and professional growth, and the Future Leaders programme in partnership with universities.

HTHKH IGNITING A PASSION FOR TELECOMMUNICATIONS

HTHKH aims to ignite a passion for the telecommunications sector among graduates and undergraduates. It offers internships to undergraduates, providing them with valuable practical experience and commercial awareness through involvement in business projects. It also offers a Graduate Trainee Programme with job rotations - enabling graduates to gain a broad hands-on experience of the business, and a Management Trainee Programme, providing graduates with opportunities for accelerated career progression through skills development and exposure to best practice.

3TALENT PROGRAMME FOR ASPIRING TELECOMS INDUSTRY LEADERS AT 3 SWEDEN

3 Sweden has introduced the 3Talent trainee programme, designed for recent master's degree graduates aiming to rapidly advance in the telecommunications industry. This year-long programme offers participants a comprehensive understanding of 3 Sweden's business model and culture, with hands-on experience in the Strategy and Business Development team, acting as internal consultants on strategic projects. Trainees rotate across departments, such as consumer business and finance, working closely with directors on complex tasks. Supported by ongoing training and coaching, 3Talent equips participants with essential tools and skills to thrive, fostering a challenger mindset in a dynamic and impactful industry.

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TALENT ATTRACTION AND RETENTION

CKHGT also recognises specific shortages in the market for customer service talent. It implements dedicated advertising campaigns and referral schemes to attract new joiners, and offers strong, tailored learning and development opportunities for customer service and sales employees, supporting career progression and aiming to retain talent over time.

For example, **3** Sweden continues to invest in social media recruitment campaigns for sales and customer service roles – this year running its successful recruitment campaign 'Sales Queens' on TikTok, attracting twice as many female applicants than in the previous year, with 90% meeting the role requirements. It offers a Customer Excellence Programme (CXP), initiating a certification programme for all CXP graduates in 2024, and a dedicated wellbeing programme for customer service employees.
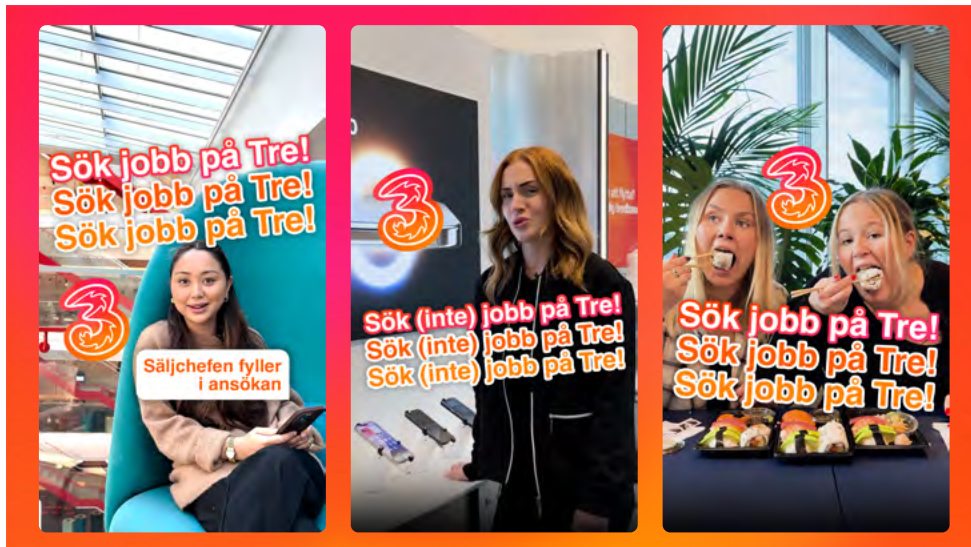
3 Sweden recruited through the 'Sales Queen' campaign on TikTok

The 3 Academy in Denmark enables employees to undertake short courses with European Credit Transfer and Accumulation System (ECTS) credits – supporting them in their personal growth and career progression while continuing to work with the company.

Building a diverse talent pipeline

CKHGT aims to recruit the best available talent to support its diverse customer base and the communities in which it operates. It therefore continues to extend and broaden its engagement with the workforce of the future, for example by partnering with educational institutions to connect with students from diverse backgrounds, and to build a longer-term pipeline of STEM talent.

For example, **3** Ireland and Trinity College Dublin have developed a STEM scholarship partnership which is funding the creation of 25 scholarships for women in STEM over five years, starting in 2022. The partnership also seeks to tackle the challenge at a systemic level by funding two posts within the Trinity Access Programme that will be dedicated to improving the accessibility of maths in Ireland's school system.

Wind Tre collaborates with numerous universities, implementing education and recruitment programmes focused on female talent. **3** Sweden collaborates with Women in Tech Sweden and Tjejer Kodar (Girls Coding) by participating in podcasts and hosting events - aiming to inspire more women to pursue careers in technology.

LAUNCH OF STEM EDUCATION INITIATIVE IN WIND TRE

Wind Tre Business has partnered with the Municipality of Montebelluna in the Veneto region to introduce advanced STEM-focused training programmes at the 'Einaudi Scarpa' Institute. This initiative represents a groundbreaking development, as it is the first time that subjects such as cyber security, big data analytics, and robotics are being offered as specific courses of study within a secondary school.

The programme aims to equip students with essential skills for future professions by offering targeted training in areas like ethical hacking, secure coding, and digital forensics. Students will also gain practical experience through big data analytics services, learning how data analysis can be utilised to optimise and plan local services.

By providing the necessary expertise and resources, Wind Tre Business seeks to foster technological innovation and bridge the digital skills gap, starting at the secondary school and technical institute levels. This collaboration underscores a commitment to preparing students for the demands of an increasingly technology-driven workforce.

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PROMOTING WORKPLACE DIVERSITY AND INCLUSION

CKHGT recognises the value of embracing diverse perspectives, experiences and ideas, with a workforce that reflects the diversity of the customers and communities it serves, and the importance of providing inclusive working environments for its employees.

CKHGT is committed to providing a working environment that offers equal opportunity to all employees, is free from all forms of discrimination, and does not tolerate harassment in any form, aligned with the CKHH Code of Conduct. It handles reports of impropriety and misconduct in accordance with the CKHH Whistleblowing Policy.

Diversity and inclusion leadership

Business units have inclusion and diversity policies and programmes suited to their local needs and circumstances.

A dedicated steering committee or working group are in place to oversee inclusion and diversity with executive sponsorship, and a dedicated senior staff member or team with responsibility for driving progress – often the Head of Human Resources or a diversity specialist within the Human Resources team.

For example, the Diversity, Inclusion and Belonging Steering Committees of **3** UK and **3** Ireland are sponsored by the Chief Portfolio and Change Officer and General Counsel respectively, and there is a Diversity, Inclusion and Belonging Team responsible for delivery. **3** Ireland continues to progress its award-winning Inclusion and Belonging Strategy and action plan, overseen by its Inclusion and Belonging Committee and the executive leadership team, to foster an ambitious, inclusive and engaging culture for all.

3 Sweden's Close the Gap Council continued its programme of activities related to inclusion, equality, and diversity. In 2024, **3** Sweden conducted inclusion workshops for all departments, with each establishing an inclusion action plan together with KPIs to track progress.

Wind Tre has a dedicated Diversity and Inclusion Manager with responsibility for defining and driving implementation of the strategy. **3** Austria and **3** Denmark's diversity and inclusion initiatives and programmes are managed by the Human Resources department.

Employee resource groups

Business units have implemented employee resource groups to create the opportunity for like-minded people to exchange ideas, share experiences, and build meaningful relationships in a supportive community. For example, **3** UK has networks for Pride, Ethnic and Cultural Diversity, Women and Accessibility. Wind Tre has 'GENERATIONS 4 INCLUSION' – a teamwork initiative involving employees from a range of diverse backgrounds. In 2024, Wind Tre organised meetings to reflect on inclusion experiences and address new challenges. Wind Tre plans to launch a gender equality programme in 2025 involving 100 managers to discuss issues such as inclusive behaviour and tools for cultural change.

3 Austria has a 'DREIversity' community of engaged employees from different departments, with events during the year covering topics such a gender pay gap and refugees in Austria. **3** Sweden has a 'Close the Gap' forum which implements engaging initiatives on inclusion topics, such as inclusive language and behaviours.

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PROMOTING WORKPLACE DIVERSITY AND INCLUSION

Gender equality

The gender balance across CKHGT remained stable at 62.5% male and 37.5% female for the third consecutive year. This reflects the nature of CKHGT as a technology-based businesses, and fewer women overall in senior leadership positions.

To redress imbalances, **3** UK, **3** Ireland, and **3** Sweden have established 50:50 gender balance targets for leadership roles. **3** Sweden is additionally targeting a 50:50 gender balance across all employees by 2025, and 60:40 (male:female) ratio for every department. **3** Austria has a target to achieve gender balance in the long-term. **3** Denmark aims for at least 40% representation of both genders on the board of directors, within the senior management team, and other management, by 2025.

In addition to its target of 50:50 balance for all internal promotions, Wind Tre has committed in its ESG Plan to increase its share of women in executive positions, ensuring equal opportunities for growth by guaranteeing a balanced candidate pipeline. It has also linked gender diversity in hiring and pay practices with executive compensation together with the other goals of its ESG Plan.

To support the achievement of gender balance targets, business units have developed and implemented action plans, including targeted communications and recruitment campaigns for women, changes to recruitment processes to reduce bias, and leadership development programmes for women. For example, **3** UK and **3** Ireland have introduced gender-neutral language in role advertisements, balanced interview panels, and unconscious bias training for hiring managers. **3** Ireland has additionally introduced anonymised CV screening. **3** Ireland continues to track and report on gender balance across the employee lifecycle, including new hires, progression, development, and engagement. **3** UK works closely with its 'Women at Three' employee network to provide tools, access, and support for women in the workplace, ranging from wellbeing to pay, benefits, and progression at work.

3 Denmark introduced a number of changes in 2024 including the requirement that candidates from the underrepresented gender are always included in shortlists for leadership positions, as well as expanded parental leave and paternity/co-parental leave schemes to promote a more equal distribution of caregiving responsibilities.

SEAL OF QUALITY FOR ADVANCEMENT OF WOMEN IN AUSTRIA

3 Austria has a strong focus on raising awareness and visibility of inclusive practice and was awarded the 'equalitA' seal of approval for industrial promotion of women by the Federal Ministry of Labour. It offers the 'Ada Growth' app for supporting professional development with a focus on females.

Gender pay gap reporting

CKHGT welcomes the legislation on mandatory gender pay gap reporting, relevant for a number of business units, and is supportive of actions that can be taken across its businesses to create gender pay equality. In 2024, Wind Tre was certified by the EQUAL-SALARY Foundation for the third year, demonstrating its equal pay for women and men. In addition, Wind Tre has received the UNI/PdR 125:2022 certification from IMQ S.p.A., accredited by Accredia, for its gender equality management system. Wind Tre has also developed a Gender Equality Policy and created an internal steering committee to oversee the implementation of its Gender Equality Strategic Plan.

3 UK has reported on its Gender Pay Gap since 2017 and **3** Ireland has reported on its Gender Pay Gap since 2022. Both business units have action plans in place to reduce gaps. Their focus is on avoiding bias in recruitment, providing leadership development and mentoring programmes, and offering employee wellbeing propositions for women.

3 Sweden conducts annual salary reviews to identify unexplained pay gaps between women and men and to make adjustments where appropriate.

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EMPLOYEE LEARNING AND DEVELOPMENT

Structured learning and development programmes are in place across CKHGT business units, aiming to address skills development needs in each market. These are supported with performance management systems enabling employees to set objectives and receive feedback, in line with business objectives and personal growth goals.

Being future-ready

The telecommunications industry is evolving at a rapid speed with technologies such as AI, cloud computing and the transition to 'Open RAN' demanding more from employee skillsets, and softer skills such as critical thinking, problem-solving and self-management, becoming more important. Business units are constantly reviewing their critical skills needs and investing in programmes to ensure their workforce is 'future-ready'.

3 UK and 3 Ireland expanded their online learning academies to include finance, project management and leadership development, providing 'on-demand' development content across a wide range of topics and career levels. 3 UK continued to offer access to over 16,000 courses via LinkedIn Learning while 3 Ireland launched Coursera, providing employees with an opportunity to engage with over 20,000 courses and professional certifications from a globally-recognised provider. Both geographies provide access to dedicated tech-skills learning platforms such as INE and Pluralsight. Both business units have set targets to achieve a 25% increase in employee engagement with their digital learning platforms in 2025.

3 Academy is the learning and development platform of 3 Denmark offering learning opportunities to all employees to assist in career progression. In 2024, 128 employees participated in the 3 Academy programme which offers European Credit Transfer and Accumulation System (ECTS) points recognised by European universities, and a Danish Ministry of Education-accredited Academy Profession Degree upon completion of six 3 Academy courses.

3 Sweden offers 'open sessions' where employees can register for different training, for example in elements of AI, creative and efficient digital meetings, unconscious bias, stakeholder communication, excel skills, project management, self-leadership, time management, stress management, and so on.

WIND TRE PREPARING FOR FUTURE CHALLENGES

Wind Tre is preparing its people for the challenges of the future by supporting their employability. As part of its sustainability strategy, it has committed to a target of 100% 'future-ready' people centred on promoting a culture of lifelong learning and self-development. In 2024, it delivered more than 200,000 training hours for its employees, including its Digital Mindset Development Programme, selected as global best practice by the Top Employers Institute.

Investing in leaders

Investing in future leaders is essential for ensuring CKHGT's business units remain innovative and resilient while nurturing the talent pipeline to retain high performers. Business units have developed comprehensive programmes to facilitate high performance in leaders and their teams.

3 UK and 3 Ireland offer 'Amplify' – a six-month development journey for those who are new to leading others or new to leading at 3. Experienced senior leaders can participate in the Connected Leaders Programme, exploring leadership models that enable businesses to flourish and grow into the future, and developing skills for coaching and courageous conversations. The Phenomenal Teams Programme is also available for leaders and their teams to support ongoing high performance.

This year, alongside existing mentoring, training and development programmes, 3 Ireland launched its new Women in Leadership Programme, in partnership with University College Dublin. The programme, made up of female leaders across the 3 Ireland business, creates a community to drive change, supporting women in their development to senior leadership roles so that 3 Ireland can be a place where women can grow, develop and enhance their careers.

3 UK continued to profile female leaders from across the business, including a Women in Leadership video series to help attract female talent into leadership roles. All hiring managers have completed mandatory training to help recognise bias and ensure inclusivity throughout the recruitment process, and 3 UK has achieved 49%:51%, a balanced gender ratio in its future leaders programme – 'Aspire' – offering development opportunities to support internal progression.

HTHKH continuously offers learning and development opportunities to help employees enhance their skills and knowledge and realise their potential. Examples include soft skills training, site visits, and mentoring programmes. To further develop expertise in specific functional areas, employees are also assigned significant roles and participate in task force teams across different business units.

3 Sweden also offers leadership development programmes covering topics such as business and innovation, for selected, high-potential employees.

Sustainability learning

In 2024, 3 UK and 3 Ireland introduced a mandatory online sustainability training programme for all employees. This initiative aims to enhance awareness, foster environmentally-responsible practices, and ensure that sustainability principles are embedded into daily operations and decision-making across the organisation.

EMPLOYEE WELLBEING

Employee wellbeing is an important part of the employee value proposition, supporting attraction and retention of talent as well as an inclusive workplace. Business units have a range of programmes in place to support their employees' mental, physical, and financial wellbeing. These often include: access to gym facilities, memberships and classes; workplace changing facilities; healthy and varied catering options; access to counselling services; and ongoing workplace enhancements enabling more social interaction during the working day.

In 2024, linked to its inclusion and belonging approach, 3 Ireland and 3 UK launched their 'Moments that Matter' proposition to ensure that employees and managers feel supported during the key life moments that matter most to them, including parenthood, menopause and life transitions.

A number of business units have dedicated support for mental health. For example, 3 Ireland and 3 UK have Mental Health First Aider Training available for colleagues. Also in 2024, 3 Ireland launched an in-person Mental Health Skills for Managers training to further embed and support employee wellbeing. The in-person training provided by Mental Health First Aid Ireland resulted in 38% of managers completing the course across Retail, Limerick, and Dublin. 3 Austria has introduced twice-weekly mental wellbeing sessions open to all employees and contractors. 3 Sweden provides employees with access to individual support on aspects of mental wellbeing such as managing stress.

Wind Tre has introduced several initiatives to enhance employee wellbeing. The 'Al Tuo Fianco' social-welfare service helps employees and their families find optimal health experts in both the public and private sector. The 'LianeCare' platform, a caregiving support platform currently in trial, assists employees with linking to professional domestic service providers such as babysitters, caregivers and pet sitters while providing free psycho-educational courses. The 'Welfare Comete' service offers professional psychological support for employees and their families, with the first consultation provided by Wind Tre. Additional support includes school vouchers, summer campus refunds, and the #Schoolreward programme, along with agreements for discounted online lessons, tutoring, and school supplies.

MENTAL HEALTH FIRST AID AT 3 UK AND 3 IRELAND

As part of the wellbeing approach, 3 UK and 3 Ireland have a trained team of over 100 Mental Health First Aiders from across the business, supported by their Employee Assistance Programme. In addition, 400 managers have received specific Mental Health training to support their teams. There are regular awareness-raising campaigns, for example around World Mental Health Day or Stress Awareness to help spotlight available resources and support.

Mental health first aiders trained and available to 3 UK colleagues

EMPLOYEE WELLBEING IN 3 UK AND 3 IRELAND

Wellbeing is one of the key pillars of the 3 UK and 3 Ireland Inclusion and Belonging Strategy. Recognising that wellbeing can mean something different to everyone and that we all need different things to thrive, 3 UK and 3 Ireland have a range of employee wellbeing support and initiatives covering mental, physical, social, and financial wellbeing. They offer a free subscription to Headspace, Peppy (menopause support), and Nudge to support employee financial education.

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CKHGT acts responsibly and with integrity in the way it manages its operations and its value chain. It also plays an active role in protecting customers from risks and potential harm where telecommunications services are misused. This includes protecting the privacy of customer data, maintaining the highest level of cyber security standards, managing environmental impacts and sourcing responsibly.

ESG ratings and recognition for CKHGT and its business units:

→ In 2023, CKHGT solicited its first Sustainalytics ESG rating, and was proud to achieve a 'low risk' rating. In 2024, CKHGT was included in the Sustainalytics' Top-Rated ESG Companies List and awarded both ESG Top-rated badges for its industry and region.
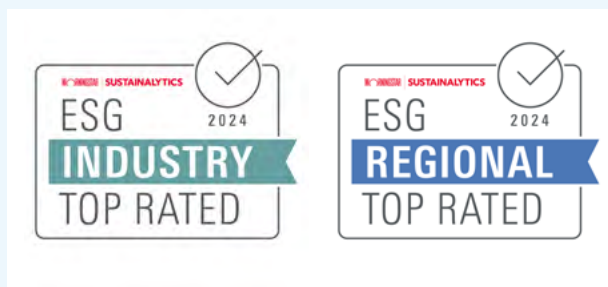
→ CKHGT retained a score of 'B' in its fifth consecutive annual submission to the CDP – the world's largest environmental disclosure system, having run for 25 years and now representing a quarter of all global institutional financial assets.

→ Wind Tre maintained its ESG rating with EcoVadis - one of the largest platforms in the world for evaluating corporate sustainability - and confirmed its place in the top 1% of companies in the telecommunications sector globally.

→ Wind Tre achieved first place in the telecommunications category as a 2023-24 'Champion of Sustainability' (La Repubblica and the German Institute of Quality and Finance).

→ Wind Tre achieved recognition as a 'Leader of Sustainability 2024'. This recognition is based on a ranking of 200 large Italian companies, assessed by Statista and Il Sole 24 Ore, using 40 sustainability indicators across ESG areas.

→ HTHKH was awarded the 2024 ESG Grand Award - ESG Awards 2024 organised by Master-Insight.com and The Research Centre for ESG at Hang Seng University of Hong Kong.

→ HTHKH received the Award of Excellence in ESG (Others and GEM Companies category) - Hong Kong Corporate Governance and ESG Excellence Awards 2024 organised by The Chamber of Hong Kong Listed Companies and the Centre for Corporate Governance and Financial Policy, Hong Kong Baptist University.

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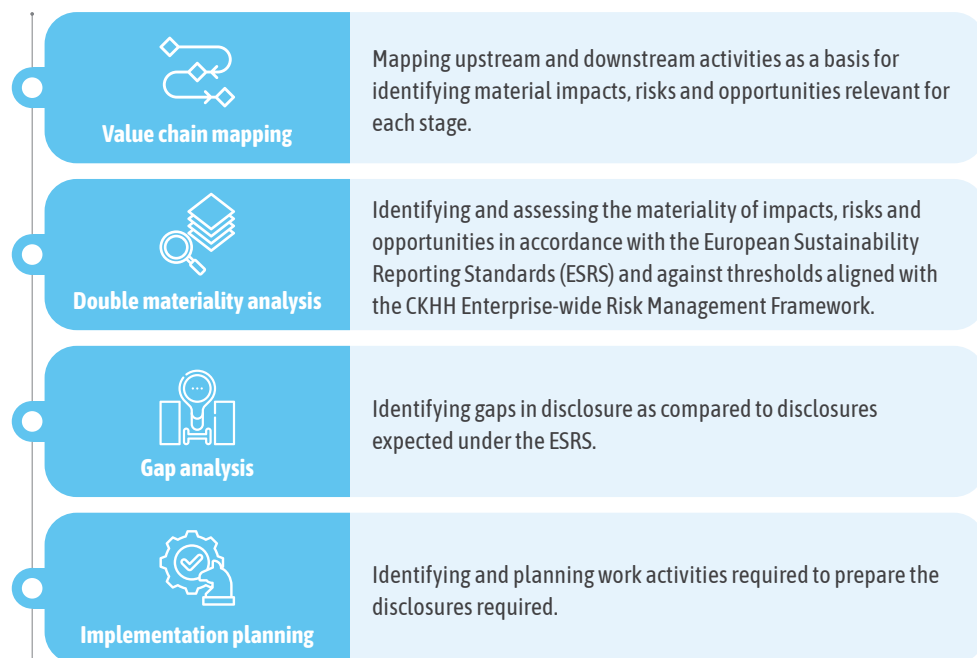INTRODUCTION | CREATING A THRIVING DIGITAL ECONOMY | TAKING ACTION ON CLIMATE CHANGE | PROMOTING A CIRCULAR ECONOMY | CREATING GREAT PLACES TO WORK | **OPERATING RESPONSIBLY AND WITH INTEGRITY** | APPENDICES

PREPARING FOR SUSTAINABILITY REGULATION

The European Green Deal includes a target to reduce EU net GHG emissions by at least 55% by 2030 compared to 1990 levels and to achieve an economy with net-zero emissions by 2050. To support the achievement of these targets, the European Commission has been working intensively on a programme of regulation and strategy across a range of topics related to sustainability standards and reporting. Two key elements of this regulatory programme, and of importance for CKHGT, are the Corporate Sustainability Reporting Directive (CSRD), including requirements related to the European Sustainability Reporting Standards and the EU Taxonomy, and the Corporate Sustainability Due Diligence Directive (CSDDD).

Corporate Sustainability Reporting Directive

CKHGT business units are participating in a CKHH Group-wide project to prepare for disclosures according to the requirements of the CSRD. During the year, it progressed through a four-stage process:

Value chain mapping
Mapping upstream and downstream activities as a basis for identifying material impacts, risks and opportunities relevant for each stage.

Double materiality analysis
Identifying and assessing the materiality of impacts, risks and opportunities in accordance with the European Sustainability Reporting Standards (ESRS) and against thresholds aligned with the CKHH Enterprise-wide Risk Management Framework.

Gap analysis
Identifying gaps in disclosure as compared to disclosures expected under the ESRS.

Implementation planning
Identifying and planning work activities required to prepare the disclosures required.

Work will continue during 2025 to prepare for the CSRD, including monitoring of changing requirements as the European Commission progresses its plans for simplification of requirements.

EU Taxonomy

As a component of the European Green Deal, the EU launched a Sustainable Finance Framework, aiming to reorient capital flows towards sustainable investment, of which a cornerstone is the 'European Taxonomy for Sustainable Activities', or 'EU Taxonomy'.

The EU Taxonomy allows financial and non-financial companies to share a common definition of economic activities that can be considered environmentally sustainable. The requirements of the EU Taxonomy are set out in the 'Taxonomy Regulation' (2020/852/EU) which entered into force in July 2020.

Under the CSRD, certain CKHGT businesses will be required from 2028 onwards to publish a range of sustainability disclosures, which will include disclosures pursuant to Article 8 of the Taxonomy Regulation.

In 2023, CKHGT began preparations for reporting in line with the EU Taxonomy. It commissioned a third-party advisor to assist in analysing how its business activities map against the EU Taxonomy for both 'eligibility' and 'alignment' reporting, as well as understanding what actions may need to be taken to enhance alignment in the future. This analysis focused on the environmental objectives of 'climate change transition', 'climate change adaptation' and 'transition to circular economy', since these are considered most relevant for CKHGT.

The EU Taxonomy Regulation will be subject to change in 2025, further to consultation, aiming to simplify complexity, expand eligible activities and ensure alignment with the EU's environmental goals. CKHGT will monitor these changes during 2025 and will revise and expand its assessment of eligibility and alignment once the updated rules have been finalised.

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PREPARING FOR SUSTAINABILITY REGULATION

EU Taxonomy

Under the framework provided by the EU Taxonomy, an economic activity can be considered as eligible where it matches the description of an activity within the Taxonomy. However, it can only be considered 'Taxonomy-aligned' (and therefore environmentally-sustainable) where it:

i.   contributes substantially to any of a series of defined environmental objectives;
ii. does not significantly harm any of the environmental objectives;
iii. complies with a series of minimum social safeguards; and
iv. complies with specified performance thresholds known as 'technical screening criteria' (or TSC).

'Environmental objectives' are defined in the Taxonomy Regulation as being:

· climate change mitigation;
· climate change adaptation;
· sustainable use and protection of water and marine resources;
· transition to a circular economy;
· pollution prevention and control; and
· protection and restoration of biodiversity and ecosystems.

Corporate Sustainability Due Diligence Directive (CSDDD)

During 2024, CKHGT held an internal training session for business unit sustainability leads on the forthcoming requirements of the CSDDD and undertook initial planning discussions for enhancements to due diligence approaches. During 2025, CKHGT will monitor changing requirements as the European Commission progresses its plans for simplification and will further develop its plans for compliance in collaboration with other parts of CKHH.

DATA PRIVACY

Protecting the personal data entrusted to us by our customers and employees remains a top priority for CKHGT, as it is essential to maintaining our reputation and brand as a trusted custodian. Regulatory activity in 2024 remained strong, with the Court of Justice of the European Union (CJEU) issuing crucial rulings in 2024, further clarifying the interpretation and application of the General Data Protection Regulation (GDPR) on topics such as the scope of personal data, the obligations of data controllers and processors, and the enforcement powers of data protection authorities. The UK government is also active in this area, with the introduction of the Data (Use and Access) Bill, which aims to harness the power of data for economic growth and support a modern digital government and improve people's lives, for example by creating a standard framework for online digital verification services, creating sectoral smart data schemes and common standards for health records.

Following political agreement in late 2023, the EU's AI Act progressed towards formal adoption and implementation throughout 2024, setting a global precedent for AI governance with significant implications for data privacy in AI applications.

Regulatory and privacy teams continue to diligently monitor these and other legislative developments worldwide to identify potential impacts and implement necessary actions for CKHGT.

Applying leading data protection standards

Data protection laws throughout the world continue to emerge and evolve, and compliance with these laws is guided by country-specific privacy policies with advice and guidance provided by locally-appointed Data Protection Officers. The EU's GDPR is considered to be the highest standard of data protection legislation and compliance, and standards to uphold this regulation are embedded in operations and processes throughout CKHGT European business units.

Data privacy governance and policy

CKHGT operates according to the CKHH Personal Data Governance Policy. This outlines required practices related to: data privacy compliance; privacy by design; privacy and data protection training; privacy risk assessments; privacy notices; disclosure of personal data to law enforcement authorities; responding to data security incidents; use of CCTV; and requirements of third-party processors. In addition, business units typically have a local level data protection or data governance policy to reflect local circumstances and requirements. Each business unit has a designated Data Protection Officer to oversee data privacy compliance and practice, accountable to the local CEO. In addition, there is often a local privacy steering committee or working group to steer data privacy activities and support ongoing compliance as the business evolves.

Regular training and awareness

Mandatory training is provided by business units to all employees at least annually. Training is typically delivered through a dedicated module, often alongside regular cyber security training, and is updated as necessary by Data Protection Officers.

For example, in 2024, **3** Sweden held a Privacy Week to engage employees on privacy topics and employees were required to complete annual mandatory data privacy training. In several business units, specific training has been developed for customer-facing staff, appropriate to their roles, and for certain external data controllers and processors.

Business units also provide information on data privacy to employees through normal communication channels. For example, Wind Tre maintains a section on GDPR procedures on its intranet and regularly informs employees about privacy compliance and regulatory updates through emails and newsletters.

Privacy risk assessments and audits

Business units routinely conduct privacy risk assessments in relation to new products, technologies and business operations.

This includes, for example in European business units, Records of Processing Activity (ROPA) (with initial risk assessment) and Data Protection Impact Assessments (DPIA) associated with GDPR, as well as Transfer Impact Assessments (TIA) where required.

The principles of data privacy by design and by default are central to approaches taken across CKHGT, with strategy, transformation and new product teams typically working closely with Data Protection Officers to ensure that data protection principles are adhered to.

Internal audits are conducted on an ongoing basis, including by GMS and local Data Protection Officers. In 2024, GMS reported on the findings of internal audits covering aspects of data privacy for **3** Ireland customer contact centres (both in-house and outsourced). External audits are also performed by national supervisory authorities, appointed external auditors, and other relevant bodies. These are conducted in accordance with applicable legal and regulatory requirements as well as data privacy policies.

European business units also regularly conduct audits of third-party Data Controllers and Data Processors.

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DATA PRIVACY

PRIVACY RISK ASSESSMENTS AND AUDITS AT 3 IRELAND

Regular privacy risk assessments and audits are integral components of **3** Ireland's data protection programme, aimed at identifying, evaluating, and mitigating risks associated with technologies and practices that impact user data.

Assessments are conducted for high-risk projects, with a focus on new systems, significant changes to existing processes, or the introduction of emerging technologies such as AI and machine learning. They typically include a review of data flows, identifying where personal data is collected, processed, stored, and shared. They also examine compliance with key regulations such as GDPR and the EU's AI Act, evaluating potential risks to data subjects' rights and freedoms.

Where required, these assessments and audits involve a deep dive into specific technologies or practices, such as cloud storage, data analytics platforms, customer relationship management (CRM) systems, and AI models. They check for compliance with data protection principles and assess the implementation of technical safeguards such as encryption, access controls, and anonymisation. Action plans are developed in response to findings, in collaboration with relevant teams to address issues promptly.

The results of assessments and audits are presented to senior management as required, ensuring continuous oversight and proactive management of privacy risks across **3** Ireland.

Privacy notices and external data privacy policies

Country-specific Privacy Notices have been developed and adapted to local regulatory requirements. These are available on business unit websites in local languages, with clear information on the collection, use, sharing, retention and deletion of personal data including data transferred to third parties (in addition to the ability to opt-out). Where a policy change occurs that affects the way customer data is managed, the Privacy Notice is updated accordingly, and in some circumstances, a significant change may be notified directly to the customer, e.g., through their account communications.

Contact details are provided within the Privacy Notice and / or on external privacy business unit websites with information on how data subjects can raise concerns about data privacy and exercise their rights under data protection legislation. This includes how they can raise concerns and make amendments, where they have not been able to do this via data self-management functions often available online.

Privacy breaches

The CKHGT Personal Data Governance Policy requires that should a Data Security Incident occur involving personal data, business units should aim to mitigate the potential consequences and to secure personal data from further unauthorised access, use or damage as quickly as possible. Business units should respond rapidly and in accordance with applicable procedures, which may include notifying the privacy authorities and/or affected individuals if required.

Business units notify relevant authorities and data subjects of a privacy breach at a minimum in compliance with legislative requirements, and often going further, depending on the significance of the breach.

Requirements on third parties

Entrusting the personal data of customers and employees to third-party vendors for data processing services requires adequate data protection from a technical and organisational point of view and specific security requirements are required from all vendors as part of contractual due diligence. These requirements relate to:

- General security in terms of physical security, access policies, software, hardware and cloud resources protection;
- Security controls focusing on the protection of data;
- Applicable privacy law; and
- For European business units, a list of internationally-verified certifications, standards and frameworks.

These requirements are supplemented with many other compliance requirements in line with country-specific data privacy laws. Third parties must also undergo rigorous assessments where appropriate and adhere to the terms and conditions in data processing agreements. Further in-depth inspections are carried out for selected third parties.

CKHGT continues to adopt new control systems to strengthen governance, risk management and compliance with data privacy legislation. For example, Wind Tre has adopted a Governance, Risk Management and Compliance system that allows it to monitor and assess compliance of the entire data processing chain.

In 2024, Wind Tre completed a review of contracts, policies, and operational instructions in place with its partners, incorporating the new supplementary provisions provided by the Code of Conduct for Telemarketing and Teleselling Activities, approved by Italy's Data Protection Authority. These documents were re-signed by all partners involved in such activities on behalf of Wind Tre.

As the rate of technological development continues at speed and new legislation on data protection develops globally, CKHGT is monitoring this area to ensure that any transfer of data is in compliance with appropriate transfer mechanisms.

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RESPONSIBLE USE OF AI

CKHGT embraces the transformative potential of AI technologies, which offer substantial operational efficiencies and productivity gains across all functions. While recognising these opportunities, CKHGT prioritises responsible implementation and ethical considerations in AI adoption.

The EU AI Act has received significant attention as the world's first comprehensive legal framework for AI, aimed at ensuring AI systems used in the EU are safe, respect fundamental rights, and foster trust and innovation. Additionally, various 'soft law' instruments in other markets contribute to a broad governance ecosystem that regulatory and product teams must consider, including sector-specific guidelines, ethical frameworks, industry standards, and best practices.

The CKHH Cyber Security Acceptable Use Policy provides comprehensive guidelines for management and employees, ensuring AI tools are deployed responsibly and in compliance with regulatory requirements, while safeguarding sensitive information. Building on this foundation, the CKHH Policy on Reasonable and Ethical Procurement, Implementation and Use of AI was introduced in September 2024. This policy articulates clear principles and protocols for AI system usage – whether internal, external or commercial – ensuring alignment with the CKHH's core principles, corporate disciplines and regulatory obligations. Additionally, business units have introduced local level responsible AI policies and procedures. For example, during 2024, Wind Tre and **3** Ireland adopted policies for ethical use of AI technologies, and **3** Ireland implemented a new framework for AI-specific DPIAs.
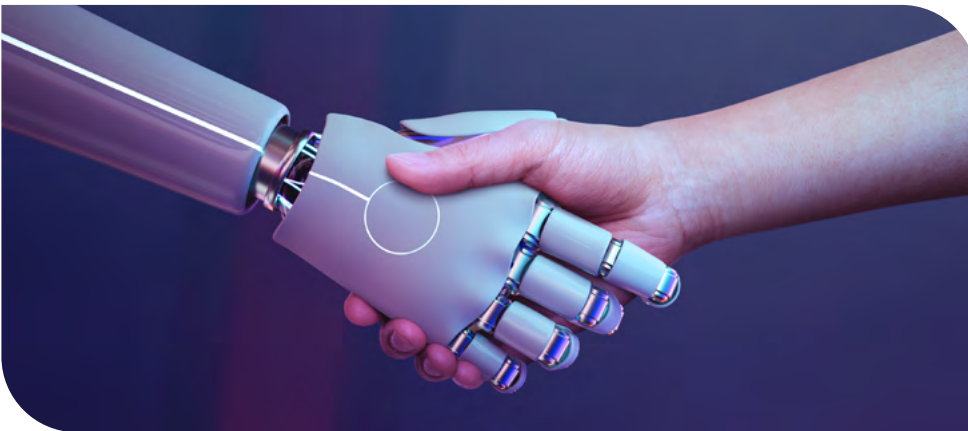
RESPONSIBLE AI POLICY AND GOVERNANCE IN WIND TRE

In line with the principles and rules established by the EU's AI Act, in 2024 Wind Tre launched an AI Policy setting out the behaviours that should be adopted, or avoided, to limit the risks arising from the use of AI systems by the company or third parties. For the effective implementation of the AI Policy and its principles, an AI Governance Committee has been established, responsible for the end-to-end governance of the procurement, implementation, commercialisation, and use of AI.

IMPLEMENTING AI-SPECIFIC DATA PROTECTION IMPACT ASSESSMENTS FOR COMPLIANCE WITH THE EU AI ACT

As a major telecommunications provider, **3** Ireland recognises the critical need to evolve its compliance framework to address the growing integration of AI systems in its operations, particularly in areas such as network optimisation, predictive maintenance, customer service automation and fraud detection. Reviewing the company's AI landscape and existing DPIA process, new data protection measures have been incorporated to encompass critical areas such as bias and discrimination prevention, system transparency and explainability, robustness and security, and the protection of fundamental rights.

To address these challenges, **3** Ireland has developed an expanded DPIA framework with mitigation strategies through collaboration between internal departments, including the legal, compliance, data science and ethics, and product management. **3** Ireland is implementing an extensive training programme for key stakeholders to ensure successful adoption. The training covers the EU AI Act's requirements, the new DPIA process, and practical examples of risk mitigation strategies. AI ethics guidelines were introduced to complement the compliance framework and promote responsible AI usage throughout the organisation.

The enhanced framework has improved the ability to identify and address information security risks related to bias, transparency and system robustness, leading to fairer and more reliable AI deployments.

CYBER SECURITY

Cyber security threats – including from phishing, vishing and ransomware – continued to grow during the year, and emerging technologies, such as the integration of AI into cyber-attacks, presented further challenges.

At the same time, there were advancements in the regulatory landscape, including the adoption of the EU's Cyber Resilience Act (CRA) in October 2024, as well as the publication of the General Scheme of Ireland's National Cyber Security Bill – which transposes the EU's Network and Information Security Directive 2 (NIS2 Directive) into Irish law.

Across CKHGT, and reflective of the focus being taken across CK Hutchison, there continued to be significant investment in platforms, systems, services, testing and training in order to maintain a strong competency in cyber security – essential to protect customer privacy and safety and the essential communication systems upon which society depends.

WIND TRE INVESTING IN AND ENHANCING CYBER SECURITY ARRANGEMENTS

THE CULTURE OF CYBER SECURITY

In the past two years, Wind Tre's direct investments in services and platforms for data and system security have included investments in network security, service continuity, customer solutions – with dedicated services for B2B customer IT security management, and cloud transition. This includes its 2023 acquisition of RAD – a company specialised in customer cyber security solutions. In 2024, Wind Tre invested approximately €18.5 million in services and platforms for data and system security. These investments are accompanied with ongoing enhancements to standards and processes.

Wind Tre has also bolstered its risk prevention and mitigation by implementing Security by Design principles, which means, wherever possible, providing for security criteria appropriate to the level of exposure of the data of the company and its customers from the initial requirement definition stages. These same principles are implemented throughout the supply chain, where suppliers are now required to comply with contractual cyber security requirements, and specific security checklists are used to verify that suppliers have adopted data protection measures.

Cyber security governance

At the CKHH level, a Cyber Security Working Group oversees the cyber security risks and defences of CK Hutchison to ensure that its efforts in this area are effective, coherent, and well-coordinated.

The Cyber Security Working Group is chaired by Mr. Frank Sixt (CKHH Group Co-Managing Director and Group Finance Director, CKHGT Group Director), who is also a CKHGT Board member and sits on the CKHGT Policy Board of CEOs. From CKH IOD – CKHGT's dedicated innovation and collaboration business – the CEO, the Director of Global Technology and Market Intelligence (former Chair of the GSMA Fraud and Security Advisory Panel) and the Director of Global Technology Solutions, all participate and represent CKHGT on this working group. The working group also includes representatives from GMS and Group Information Services Department.

To supplement this, a sub-working group focused on operational technology further builds common approaches to cyber security across its mobile businesses, leveraging the deep knowledge and opportunities for collaboration across CKHGT. CKH IOD provides specialist input to this sub-working group where needed; for example, throughout 2024, benchmarking the tools and processes across CKHGT that contribute to cyber-readiness, allocating scores and identifying areas for improvement.

The CKH IOD business has responsibility for cyber security in relation to a number of central functions across CKHGT: CKHGT roaming hub and services; SIM and eSIM functions; the Mobile Virtual Network Operator (MVNO)-enabling platform; the CKHGT IoT platform; and the Group Digital Hub (consumer applications). The CKH IOD cyber security operations team is managed by the Director of Global Technology Solutions, with oversight of security operations by the Director of Global Technology and Market Intelligence.

In addition, each business unit has its own cyber security governance arrangements with dedicated cyber security teams led by a Chief Information Security Officer or IT department head, reporting either to the business unit Chief Technology Officer or the business unit CEO. These business unit teams manage governance and operational responsibility for network and IT security developing and implementing cyber security programmes, aligning cyber security and business objectives, incident reporting, disaster recovery, staff cyber security training and managing relationships with the relevant national security agencies.

The cyber security defences of HTHKH are governed by a Security Committee led by the Vice President of Digital Innovations and IT Development, and including technical specialists from the IT Department. It oversees cyber security risk and monitors the cyber threat landscape to gain insights into emerging and existing attacks and their implications. It also ensures that the efforts in managing cyber security risks are effective, coherent and well-coordinated.

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CYBER SECURITY

A formal body has been established across 3 Denmark and 3 Sweden to oversee collaboration on information security standards and approval of related investments.

To meet the ongoing challenges of cyber security risk management and mitigate the latest threats, CKHGT collaborates with wider industry bodies such as the GSMA and the European Telecommunications Standards Institute (ETSI). CKHGT also incorporates security technologies developed by the Internet Engineering Task Force (IETF) where appropriate – such as in 2024, the adoption of new secure messaging protocols for mobile devices. Business units also monitor the latest cyber security threats through industry forums and bulletins at a local level to maintain awareness of the latest and emerging risks.

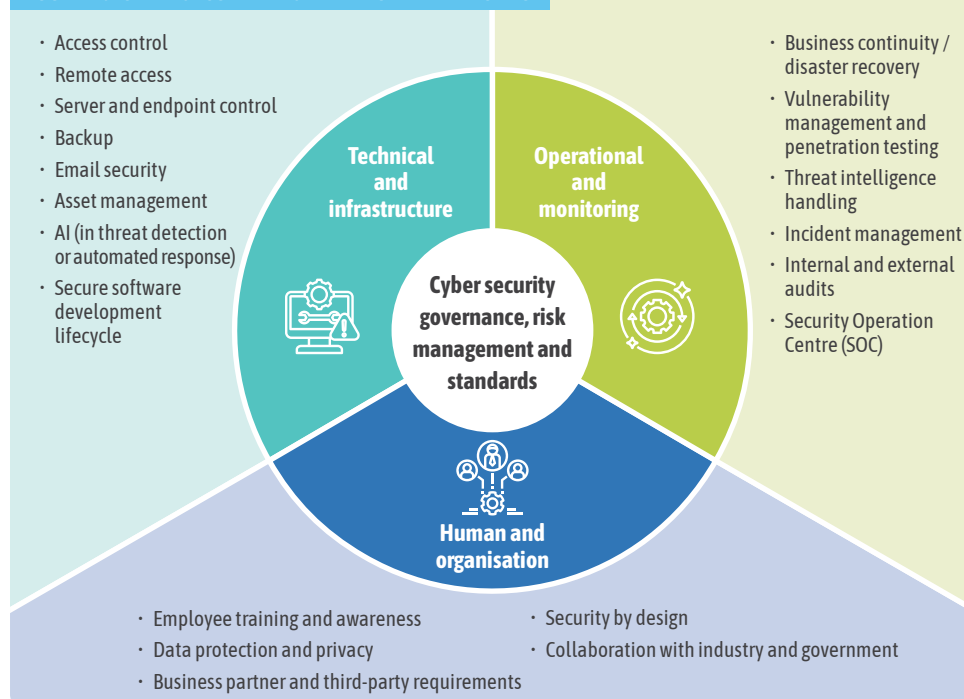All cyber security management is conducted within the framework of the CKHH Information Security Policy.

Cyber security risk management frameworks and standards

Wind Tre and 3 Austria, together representing over 48% of CKHGT operations, are certified in accordance with ISO 27001. Other UK and European business units comply with ISO 27001 minimum control standards, to support robust arrangements for information security risk management, with security a key criterion in the design, implementation, running and decommissioning of systems.

Business units also incorporate best practice and guidance from the National Institute of Standards and Technology (NIST) into their cyber security risk management approach.

In 2024, 3 Sweden and 3 Denmark continued to prepare for the NIS2 Directive across their shared IT and network technology functions. A unified risk management framework was implemented, strengthening cyber security governance and risk oversight, and the cyber security policy framework was updated to align with company objectives and regulatory requirements. A new information security management system tool was launched to support risk management, incident management and documentation. Project and systems implementation will continue through 2025.

FIGURE 16: CYBER SECURITY RISK MANAGEMENT AT CKHGT

Technical and infrastructure
- Access control
- Remote access
- Server and endpoint control
- Backup
- Email security
- Asset management
- AI (in threat detection or automated response)
- Secure software development lifecycle

Operational and monitoring
- Business continuity / disaster recovery
- Vulnerability management and penetration testing
- Threat intelligence handling
- Incident management
- Internal and external audits
- Security Operation Centre (SOC)

Cyber security governance, risk management and standards

Human and organisation
- Employee training and awareness
- Data protection and privacy
- Business partner and third-party requirements
- Security by design
- Collaboration with industry and government

PAYMENT CARD INFORMATION SECURITY AT HTHKH

To ensure secure online transactions for customers, HTHKH obtained a Certificate of Compliance with the Payment Card Industry Data Security Standard (PCI DSS v4.0 – Merchants) during the reporting period. PCI DSS is a global standard that establishes a baseline of technical and operational requirements for protecting account data. This certification demonstrates that HTHKH's services provide a secure environment for accepting, processing, storing or transmitting credit card information.

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CYBER SECURITY

External and internal audits and vulnerability assessments

Regular external and internal audits and ongoing vulnerability assessments are an important element of CKHGT's cyber security risk management approach.

All business units conduct regular security reviews, vulnerability assessments, attack path mapping and penetration testing on their networks, systems and externally facing applications, either led internally or using external consultants. These reviews are performed using standardised approaches, reflecting threat intelligence feeds and industry benchmarks, with results reviewed and operational changes made as necessary. These exercises probe not only the IT aspects, but also the people aspects, for example by sending phishing emails to gauge staff responses and attempting to put monitoring devices into networks or IT infrastructure.

Wind Tre has a dedicated 'Security Operation Centre' that carries out continuous and real-time protection and threat neutralisation using advanced data analysis and process automation technologies.

Cyber security also forms part of the regular internal audit programme of the GMS team, with **3** Ireland and HTHKH network security, as well as **3** Austria IT security, coming within the scope of audit for 2024.

In 2024, the Cyber Security Working Group continued its major programme of benchmarking and monitoring cyber security preparedness, with annual self-assessments and twice-yearly progress reporting by all business units.

Employee training and awareness

People factors are crucial in raising cyber security awareness and maintaining vigilance. Research shows that the level of knowledge of cyber threats depends on education, age, training and job profile. CKHGT therefore invests in continuous cyber security training for staff.

CKHGT business units deliver mandatory annual training and offer additional online training for employees, and contractors where appropriate, to boost staff security awareness – especially on aspects relating to social engineering, phishing and ransomware attacks, and data security compliance. Throughout the year, they distribute periodic fraud alerts and run workshops related to new and common threats to raise cyber security awareness. Instructor-led sessions are also held for high-risk functions to reinforce best practice and identify any areas of concern.

For example, in 2024, to raise awareness of cyber security, **3** Sweden held targeted e-learning initiatives for all staff in addition to its annual online training, classroom training, employee phishing simulations and digital phishing-awareness courses. **3** Denmark implemented a new awareness programme for all employees covering privacy, information security, AI and IT security. HTHKH and Wind Tre also launched new cyber security training platforms for all employees.

In addition to mandatory e-learning and automated phishing simulations, **3** UK held its an annual awareness campaign, 'Security Live!', involving three days of presentations from internal and external experts, communication campaigns, competitions and gamified activities on cyber security topics. **3** UK also has an annual 'SAFE' online module covering various security topics, requiring a 100% pass rate.

CYBER SECURITY AWARENESS TRAINING AT HTHKH

During the reporting period, HTHKH initiated cyber security awareness training for all employees, both full-time and part-time, through a third-party training agency.

This online training equips employees with the knowledge and skills needed to safeguard personal and sensitive company information from online threats. The cyber security awareness course covers various topics, including password management, and requires employees to complete an online assessment to confirm that they understand the material.

In addition to the cyber security training offered to employees, HTHKH continued its 'Cyber Security Awareness Month' in 2024, which included an ethical phishing email campaign to assess employees' awareness of phishing threats and provide further cyber security awareness training where needed.

NEW CYBER SECURITY TRAINING PLATFORM IN WIND TRE

In 2024, Wind Tre launched Cyber Factor 2, a new company-wide cyber security training programme. The training covers six modules: phishing; malware and social engineering; cyber incidents; mobile security; cyber security in daily life; and AI risks. Wind Tre also introduced a visual aid for employees on ten key cyber security best practices, communicated via the intranet. Moreover, Wind Tre refreshed internal policies to reinforce good practices for device usage and to emphasise the importance of protecting company data.

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CYBER SECURITY

Responding to data breaches and cyber-attacks

CKHGT business units have implemented endpoint detection and response, data recovery strategies, and incident response plans for data breaches and cyber-attacks. CKHGT is also investing in, and procuring tools and services to detect cyber security attacks thereby enabling a quick response. For example, in 2024, **3** Sweden upgraded its 'Security Information and Event Management' (SIEM) system to enable AI-driven security analytics.

Business units have dedicated teams or individuals, and local level procedures for responding to crises or critical incidents, including data security incidents. **3** Sweden and **3** Denmark have a dedicated Computer Security Incident Response Team (CSIRT). Local procedures can include the appointment of third-party specialists, as well as intelligence/alert sharing to other CKHGT business units.

The incident response process is dependent on the significance of the incident; in the event of a data security incident involving personal data, business units will respond immediately according to applicable procedures to mitigate the potential consequences and secure personal data from further unauthorised access, use or damage.

The Legal and Regulatory Affairs Department, Corporate Security teams, and Corporate Affairs teams for some business units, will be alerted, and the relevant authorities and affected individuals (data subjects) will be notified if required.

Following an initial assessment of incident significance, the response will proceed according to established plans including business continuity plans, disaster recovery plans, and backup and data recovery strategies. Failover and restore tests are regularly performed, including as a part of system changes. Guidance on handling of data security incidents and the notification process is reviewed and updated periodically.

DATA SECURITY INCIDENT RESPONSE AT HTHKH

Each business unit within HTHKH is required to develop an information security incident response plan that outlines the personnel responsible for addressing incidents, the communication processes with both internal and external stakeholders, and the technological tools and resources utilised to identify and recover compromised data. In the event of an incident, details regarding any compromised or potentially compromised data, along with the steps taken to address the situation and the resolution process, must be reported to relevant parties, including the Legal and Regulatory Affairs Department, Information Owner, Information Security Custodian, and any affected business units within HTHKH.

Looking ahead

CKHGT is continuously evaluating emerging technologies to assess relative risks and benefits and developing appropriate security policies and technical capabilities.

The decentralisation of mobile networks through increased use of the cloud and mobile edge computing creates new cyber security challenges to which business units must respond, requiring continued investment in tools for endpoint detection and response, security rating service, and external attack surface management.

CKHGT has also begun the first stage of a long-term project of transition to 'quantum-resistant' cryptography, such that systems and customers can continue to be protected in a 'post-quantum' world.

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ANTI-BRIBERY AND CORRUPTION

CKHGT, aligned with CKHH, takes a zero-tolerance approach to fraud, bribery and corruption. The CKHH Code of Conduct (the Code) outlines professional integrity expectations, establishing comprehensive standards for business conduct across all subsidiaries and controlled affiliates, including CKHGT. Directors and employees are mandated to strictly comply with both the Code and jurisdictional laws where CK Hutchison operates, with employees serving as directors of non-controlled affiliates actively promoting these standards to such affiliates.

Through its comprehensive Anti-Fraud and Anti-Bribery Policy, CKHH provides clear guidance to employees of CKHGT on identifying and preventing unethical practices across all business activities, including procurement processes, gift and hospitality protocols, and charitable contributions. This commitment to ethical business practices extends to third-party relationships through the Policy on Appointment of Third-Party Representatives, ensuring proper control in hiring third-party representatives and consistency in anti-corruption standards throughout CKHH.

In addition, business units have local ethical codes. These policies set clear requirements and standards for employees to conduct business fairly, actively avoiding conflicts of interest and various forms of fraud and bribery, aligned to CKHH policy and reflecting local arrangements.

CKHGT prioritises compliance with laws and regulations, sound governance, and business integrity. To support this commitment, CKHGT applies CK Hutchison's comprehensive internal control framework that encompasses anti-corruption measures, training programmes, due diligence processes, and a whistleblowing mechanism. This includes a strong focus on monitoring and enforcing compliance with policies, procedures and guidelines. Regular management reviews and reporting are conducted to assess the execution and adherence to these standards.

ENSURING ETHICAL PRACTICES WITH THE CODE OF ETHICS AT HTHKH

HTHKH enforces a zero-tolerance policy towards all forms of bribery. HTHKH's Code of Ethics specifically addresses the management of conflicts of interest, emphasising that employees must remain vigilant and avoid situations that could lead to such conflicts. Employees are required to promptly report any instances or activities that may involve potential conflicts of interest to the Human Resources Department. Such cases will be reviewed by the heads of the relevant departments, along with teams from the Human Resources, Legal and Regulatory Affairs, and Corporate Security, to determine appropriate actions. Non-compliance with the Code may result in disciplinary measures, and any violations of law and regulations will be reported to regulatory or law enforcement authorities.

ANTI-CORRUPTION DUE DILIGENCE ON THIRD-PARTIES IN WIND TRE

Wind Tre has established a risk-based due diligence procedure for its business partners, which must be applied to any third-parties deemed to be at greater risk of non-compliance with the anti-corruption legislation, prior to the establishment of a new business relationship, or the extension or renewal of an existing relationship. For example, suppliers in the procurement area, consultants, and business sales agents are subject to due diligence procedures. 261 due diligence procedures were carried out in 2024.

At the same time, Wind Tre has also established a Donations, Sponsorships and Membership Fees Procedure and a Gifts and Hospitality Procedure, which sets out methods according to which these initiatives are managed. In 2024, in-depth preliminary analyses were conducted on all donations, sponsorships and membership fees paid during the year, according to the new procedures, with the aim of enhancing and protecting Wind Tre's reputation, image and presence in the social and environmental arenas in which it operates.

Since 2019, Wind Tre has been a member of Transparency International Italia, the Italian branch of the largest anti-corruption group in the world.

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WHISTLEBLOWING

CKHGT operates in accordance with the CKHH Whistleblowing Policy and associated reporting arrangements. These include a system for employees and external stakeholders including customers, suppliers, creditors, and debtors to report, in confidence, any suspected improprieties, misconducts, or malpractices within CK Hutchison. It operates in local languages via corporate websites.

In accordance with the CKHH Whistleblowing Policy, all reported cases are handled with strict confidentiality, and whistleblowers receive appropriate protection against unfair dismissal, victimisation, and unwarranted disciplinary action.

Reports of material incidents are required to be escalated to the CKHH Group Co-Managing Director and the CKHH Group Finance Director and Head of Internal Audit within one working-day.

Reported incidents of fraud and corruption are subject to appropriate investigation. Internal Audit is responsible for reviewing reported incidents, consulting relevant stakeholders, conducting in-depth investigation where necessary, and reporting findings to the CKHH Executive Directors and the CKHH Audit Committee.

The CKHH Group Co-Managing Directors receive quarterly updates detailing material reported incidents, investigation outcomes, and consequent actions. Substantiated complaints result in disciplinary action following due management consideration, including verbal or written warnings and termination of employment. Violation of laws and regulations are reported to relevant regulatory or law enforcement authorities.

Business units implement local policies and procedures for whistleblowing aligned with the CKHH Whistleblowing Policy and in compliance with local legal requirements.

For example, under the Protected Disclosures Act, [3] Ireland encourages reporting of concerns related to impropriety or malpractice via its Protected Disclosures Portal, ensuring confidentiality of submission and protection from reprisal. Investigations are carried out by independent representatives in the business or an external investigation team. Compliant with Italian Legislative Decree No, 24/2023, Wind Tre has established multiple reporting channels, including an online platform and dedicated email addresses, protecting confidentiality and prohibiting retaliation. [3] Sweden maintains a secure and anonymous channel for reporting suspected misconduct. During the year, it increased the visibility of its whistleblower function and developed the 'Speak Up Buddy' concept. It maintains a strict policy to prevent fraud and corruption, and all employees receive annual training on these matters.

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CUSTOMER ENGAGEMENT AND RELATIONSHIP MANAGEMENT

CKHGT business units proactively engage with their customers and consistently strive to enhance service quality to improve customer satisfaction and foster strong mutual trust, which helps strengthen brands. They have established multiple communication channels, including customer service centres, social media platforms, live web chat, email, website and mobile applications.

MULTI-CHANNEL FEEDBACK OPTIONS FOR CUSTOMERS OF HTHKH

HTHKH has implemented a Customer Feedback Management Policy and established multiple channels for customers to share their feedback, including a 24/7 hotline, email, an online enquiry form and a mailing address. HTHKH's goal is to offer convenient and effective feedback options, providing thoughtful solutions to its customers. During the reporting period, HTHKH introduced a new WhatsApp channel to enhance customer service communication.

HTHKH fully adheres to the Code of Practice for Telecommunications Service Contracts, developed by the telecommunications industry in collaboration with the Communications Association of Hong Kong.

HTHKH also participated in the Customer Complaint Settlement Scheme set up by the Communications Association of Hong Kong for the telecommunications industry. This mediation programme assists in resolving billing disputes between service providers and customers. To ensure the best and timeliest service is delivered to customers, internal targets for handling customer complaints have been developed to closely monitor the quality of customer service.

KEEPING TRACK OF REPUTATION AND BRAND EQUITY AT WIND TRE

In 2024, Wind Tre measured its reputation using RepTrak, a leading reputation measurement platform that uses consumer surveys to evaluate perception across a range of reputation drivers, including citizenship, governance, products and services and innovation. Wind Tre's reputation in 2024[1] was 61.4 (on a scale of 0-100), an increase of 1.5 points compared to 2023, and making Wind Tre the only Italian telecommunications company experiencing such growth. The rise in Wind Tre's reputation has been driven by improvements in production and innovation, where the quality of services meets customer needs.

In the October 2024 BE Telco (survey) the WINDTRE brand achieved an increased 'brand power' of 14.7 (+0.9 points from May 2024), confirming its commitment to being a major and competitive brand that can respond to the needs of Italian families.
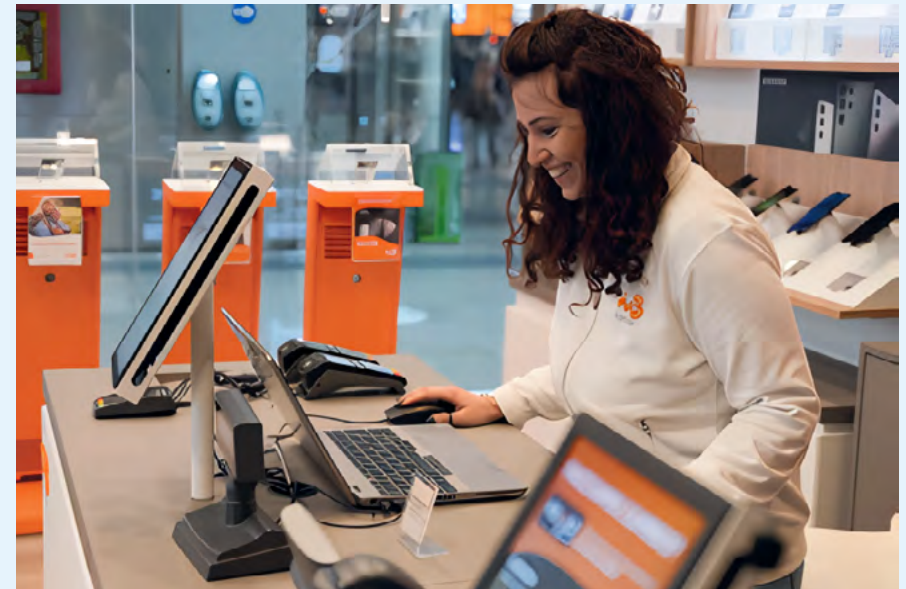
Wind Tre retail store

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[1] *Based on the period January to September 2024.*

ENVIRONMENTAL POLICY AND MANAGEMENT

All CKHGT business units manage environmental impacts in line with the CKHH Environmental Policy, which is applicable to all CKHH businesses. A number of business units have additional local level environmental policies to guide their activities.

Environmental management systems and audits

Environmental management systems continue to be important for business units to systematically manage their environmental responsibilities, impacts and performance. Environmental audits regularly take place as part of management system certification, as well as driven by local regulations or voluntarily as part of local operational management plans. Audits are performed by external independent organisations, or conducted as part of the regular internal audit programme of the GMS team.

Wind Tre has environmental management systems over network design, installation and maintenance operations certified to ISO 14001:2015 standard, as well as certifications for ISO 50001 (energy management) and ISO 14064-1 (climate change). During 2024, Wind Tre had ten external audits and six internal audits – all related to environmental management systems.

3 UK also has an environmental management system certified to ISO 14001: 2015 standard, which was audited in 2024 with no non-conformities. There were also environmental audits completed as part of the internal audit programme, at five legacy data centres and two head offices. **3** Ireland achieved ISO14001:2015 certification for the first time in 2024, undergoing both internal and external environmental audits. HTHKH extended its scope of ISO 14001:2015 certification, also completing its second surveillance audit of previously certified sites. Business units with certification represented over 80% of CKHGT operations at the end of 2024.

3 Austria had its four-yearly mandatory Energy Efficiency Audit as required by Austrian law, conducted by an external auditor.

Environmental targets

As outlined in this report chapter 'Taking Action on Climate Change', CKHGT has set near-term science-based targets which have been approved by the SBTi, and has set a long-term net-zero target which was submitted to the SBTi for approval[2]. All business units are working collaboratively towards these.

Additionally, a number of business units have set individual targets across aspects of environmental management including percentage of electricity from renewable sources, reductions in fleet emissions, reductions in business travel, reductions in paper usage, and responsible recycling of network waste.

Going forward, CKHGT intends to increase alignment of certain environmental targets as it integrates metrics into short-term incentive plans for senior management.

Sustainable procurement policies and frameworks

Sustainable procurement, involving the identification and management of environmental, social and governance risks in the supply chain, is an essential aspect of operating responsibly. As a large group of companies, CKHGT also has an opportunity and a responsibility to use its influence to drive improvements in supplier practices.

All business units procure goods and services in line with the CKHGT Supplier Code of Conduct, and the CKHGT Human Rights Policy. The CKHGT Supplier Code of Conduct covers expectations of suppliers in relation to a broad range of topics including: environmental management and protection; climate change and GHG reduction; protection of natural resources and biodiversity; human rights, labour rights and other social standards.

These include our aim to prioritise suppliers that have a commitment to a science-based emissions reduction target and / or a GHG reduction plan.

As outlined in the CKHGT Supplier of Conduct, the requirements are applicable to second tier suppliers, with first tier suppliers expected to disseminate and educate the requirements of the Code to their employees, agents, sub-contractors and suppliers, and hold them accountable for any non-conformance acts.

During 2024, **3** Austria published a new Code of Conduct for Suppliers, with additional criteria such as data security, which all new suppliers must commit to.

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[2]   *The SBTi approved CKHGT's net-zero target in 2025.*

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SUSTAINABLE PROCUREMENT AND SOCIAL SUPPLIER STANDARDS

Supply chain management

Within each business unit, senior level responsibility for supply chain rests with the business unit Chief Financial Officer supported by one or more procurement directors or managers.

Business units have developed more detailed, local level supplier codes of conduct, aligned to CKHH and CKHGT policy, that selected suppliers are often required to accept or adhere to as part of their contract. A number of business units have implemented programmes to assess supplier risks associated with environmental, social and corporate governance factors, and identify non-compliant suppliers, using EcoVadis or another supplier assessment tool, and to weight these factors in procurement decisions.

A number of business units provide channels for supply chain workers to raise concerns. For example, **3** Sweden provides a contact number whereby breaches of the Code of Conduct for Business Partners can be reported to the Director of HR or Chief Legal Officer, including provision for anonymous reporting if required.

SUSTAINABLE PROCUREMENT PROGRAMMES IN 3 UK AND 3 IRELAND

During 2024, **3** UK and **3** Ireland continued to further develop their sustainable procurement programmes, leveraging the EcoVadis platform, and Dun & Bradstreet for **3** UK. **3** UK extended the roll-out of its supplier onboarding system to its existing supplier base, to capture more detailed ESG information from suppliers. This also includes a requirement for suppliers to confirm compliance with its Supplier Code of Conduct. As part of this process, Dun & Bradstreet ESG scores were integrated into the overall risk rating and the **3** UK procurement team must review and approve prior to any business being conducted with the supplier. Where necessary, **3** UK has developed an action plan for those suppliers who do not meet expected standards.

3 UK and **3** Ireland had targets to assess 95% of their suppliers by spend by the end of 2024. As at the end of 2024, **3** UK had assessed 98% suppliers by spend and **3** Ireland had assessed 87%, up from 91% and 44% respectively at the end of 2023.

WIND TRE DEPLOYS CRIBIS FOR SUPPLIER ESG RISK ASSESSMENT

Wind Tre integrates ESG factors into procurement processes and supplier selection using Cribis Synesgy – a global digital platform for assessing and monitoring supplier ESG performance. The platform scores each supplier and proposes areas for improvement based on the company's sector. Suppliers are required to update their assessment on an annual basis so that Wind Tre can monitor progress. In 2024, Wind Tre extended its supplier ESG performance analysis and monitoring, identifying a selection of potential suppliers subject to sustainability improvements and involving them in ad hoc meetings dedicated to ESG topics.

By the end of 2024, Wind Tre had reached a total of 68% of Procurement-team managed suppliers registered on the ESG platform with a completed ESG questionnaire, exceeding its target of 65%.

BUSINESS PARTNER DUE DILIGENCE IN HTHKH

HTHKH has established a Supplier Code of Conduct, a Purchasing Policy, and Business Partner Evaluation Policies and Procedures. It evaluates business partners and suppliers against pre-defined criteria in areas such as technology, sustainability, quality, and reputation, to ensure that required standards are met. Business partners and suppliers are required to provide supporting documentation for evaluation and record-keeping.

Following HTHKH's introduction of ISO management systems into certain operations, HTHKH has actively engaged with its suppliers to facilitate the implementation of similar systems or acquisition of related certifications. During 2024, HTHKH had 666 suppliers and 326 of them were evaluated.

Additionally, selected business partners and suppliers must sign an acknowledgment form confirming their awareness of the relevant terms, standards, and requirements, and their commitment to comply with the Supplier Code of Conduct.

Conflict minerals

Conflict minerals (tin, tungsten, tantalum and gold – commonly referred to as 3TG) are minerals that can finance armed conflict or mining using forced labour, particularly in conflict-affected and high-risk areas as defined by the Organisation for Economic Co-operation and Development (OECD). CKHGT is committed to avoiding the use of conflict minerals in its supply chain, as stated in the CKHGT Human Rights Policy and as required of suppliers within the CKHGT Supplier Code of Conduct.

A number of business units assess supplier approaches to conflict minerals through their environmental, social and governance risk supplier assessment process using EcoVadis or a similar tool. During 2025, there will continue to be a focus on extending the CKHGT's due diligence with respect to conflict minerals.

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HEALTH AND SAFETY

CKHGT complies with or exceeds applicable health and safety laws and regulations and upholds industry specific standards for best practice. All business units manage health and safety in accordance with the CKHH Health and Safety Policy and aligned local policies. During the year, **3** UK achieved ISO 45001:2018 Occupational Health and Safety Management System certification, joining Wind Tre and HTHKH for designated sites, and meaning business units representing over 74% operations by revenue have now achieved certification. Business units conduct regular risk assessments to identify potential hazards and necessary control measures to minimise health and safety risks and have accident and incident response procedures. In Wind Tre, the Facilities Management department is responsible for defining safety standards and procedures to meet regulatory requirements, and ensuring that the design and implementation of systems protect employees and company assets. Risk assessments include identification of hazards, required protective measures, necessary safety training, and personal protection equipment to be used.

Business units offer various training opportunities, covering topics such as fire safety, first aid, personal security, health and safety and environment, to ensure that safety principles are well understood and shared by all levels of employees.

3 Austria has developed health and safety instructions for its employees and subcontractors, applicable to all premises, and setting out minimum requirements on fire safety, health and safety, hygiene and other related matters. Occupational accidents and near-misses are recorded, with root cause analysis and corrective actions taken. An occupational psychologist is available for all employees at the **3** Austria headquarters in Vienna.

CKHGT aims to work with like-minded partners, contractors and suppliers who share the same values regarding the wellbeing of their employees. Business units have introduced specific clauses to ensure contractors' safety performance, and risks are monitored and assessed during the tendering process and project implementation.

For example, the contractual standards of Wind Tre include specific clauses that regulate the treatment of the supplier's personnel. Suppliers are required to satisfy all obligations derived from collective agreements, with specific reference to environmental and territorial protection, workplace safety and labour legislation in general. Contractors' safety performance and risks are assessed according to the SA 8000 Social Accountability Management System. Safety performance is also monitored through the progress of the work, with periodic meetings and final testing upon completion of the work. Similar arrangements are also adopted by other business units.

AWARD-WINNING SAFETY FOR EMPLOYEES, PARTNERS AND CONTRACTORS IN 3 UK

In 2024, **3** UK was awarded its 7th consecutive Gold Medal award from the internationally renowned Royal Society for the Prevention of Accidents (RoSPA) demonstrating its commitment to continuous improvement and excellence in health and safety. The People Workspace Health, Safety, Environment and Energy (HSEE) Team led the annual award application which includes performance statistics, over 100 pieces of evidence and an accompanying narrative of 6,000 words. The submission to RoSPA consisted of examples from across all areas of the business showcasing strong and effective leadership, governance, and risk management.

FOSTERING A CULTURE OF HEALTH AND WELLBEING AT HTHKH

HTHKH prioritises the health and wellness of its employees, recognising that their wellbeing is essential to its success. In addition to comprehensive medical benefits, HTHKH periodically offers health checkup promotion plans to encourage proactive health management.

To ensure prompt care and treatment in case of an accident, HTHKH has designated first aiders and has equipped each office floor with first aid kits. Regular fire drills and first aid training sessions are conducted to keep the first aiders prepared and responsive in emergencies. Occupational health and safety concerns are communicated to all employees through working instructions.

Additionally, HTHKH organises regular health-related talks and workshops to raise awareness about health topics, empowering its employees to make informed choices about their wellbeing. During 2024, HTHKH organised a health talk and a follow-up cancer risk assessment to educate its employees about cancer prevention and early detection.

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ELECTROMAGNETIC RADIATION

CKHGT takes health and safety very seriously and is committed to the highest scientific and safety standards in all operations.

Sites are designed and operated to comply with best international practice in mobile telecommunications and with all applicable national and international standards including those related to electromagnetic radiation fields.

The International Commission on Non-ionising Radiation Protection (ICNIRP) has developed international guidelines for Electromagnetic Frequency (EMF) radiation exposure which set out the safe operating limits for radio wave transmissions, including safety zones required around antennas.

These limits have been assessed and endorsed by the World Health Organisation (WHO) and by the European Commission's 2015 report from their Scientific Committee on Emerging and Newly Identified Health Risks. The WHO has stated in its EMF Fact Sheet that 'no adverse health effects have been established as being caused by mobile phone use' while the European Commission has stated that 'EMF does not represent a health risk if the exposure remains below the existing limits'.

Business units are required to operate their networks within safe limits in accordance with their licenses, and monitor compliance with required limits, in some cases audited by external, national regulators.

A number of business units take an active role in industry dialogue on EMF radiation. For example, **3** Austria and **3** Sweden participate in industry forums to share information and advice, and **3** Denmark has collaborated with other local operators to develop guidelines on compliance with limits. Wind Tre is actively working to raise awareness among national institutions and customer advocates of the existing differences between Italian and other European electromagnetic emission limits.

3 Sweden collaborates with other local operators and industry organisations to raise awareness about the effects of EMFs, via published information sheets and a dedicated EMF spokesperson.

QUALITY MANAGEMENT

Quality management relates both to products sold, including devices and accessories, as well as the arrangements in place to ensure quality in the provision of telecommunication services.

Products sourced by business units are compliant with European or local regulations and standards related to health, safety and environmental protection, including for example, labelling according to the requirements of the Waste Electrical and Electronic Equipment Directive. Product quality and safety standards are specified within supplier agreements. Within individual operating companies, certifications are required from vendors, or maintained directly within operations.

CKHGT's largest business unit, Wind Tre, representing 37% of operations, maintains ISO 9001 certification in relation to design, planning, control and operations, related to telecommunications services for large business customers. This forms part of the overall Wind Tre quality management system. The clear documentation of processes and definition of responsibilities integral to the quality management system helps to ensure ongoing service quality, continuous improvement and compliance with relevant legislative requirements.

HTHKH regularly performs inspections and audits to maintain the quality of its network services. Additionally, the 'HoneyBee' programme, launched in 2021, establishes and measures user experience metrics in Hong Kong, helping to ensure that HTHKH delivers stable and reliable services to its customers.

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BUSINESS CONTINUITY PLANNING

Throughout CKHGT and aligned with CKHH, the business continuity planning approach has several shared components. These are primarily focused on building resilience, enabling swift recovery, and establishing contingency measures.

Business units maintain business continuity plans (BCPs) and crisis management procedures as part of the wider risk management framework, to maintain network resilience and minimise disruption to operations, customers and staff in the event of a significant incident or major planned activity. BCPs include management responsibilities, internal and external actions for response, recovery and resumption, and communications between stakeholders to be undertaken in times of crisis. Drills are often conducted to ensure that key team members are well prepared for any emergency, with debriefs conducted to assess performance and further enhance the response programme.

Where appropriate, business units collaborate with other providers in their geography, on overall collaboration for recovery in the event of a significant incident. For example, 3 Sweden is a member of the National Telecommunications Collaboration Group – a collaboration formed in 2005 to support readiness for restoration of national electronic communications infrastructure in the event of a serious disruption to society.

3 SWEDEN'S ROLE IN PROTECTING NATIONAL TELECOMMUNICATIONS INFRASTRUCTURE

In the context of increasing global uncertainty, in 2022, the Swedish Civil Contingencies Agency (MSB) classified 3 Sweden's operations as a 'critical societal function', meaning that they must be maintained or quickly restored in the event of an emergency, and bringing increased responsibility for strengthened resilience and continuity planning.

3 Sweden's goal is to cooperate with other stakeholders to maintain network operation for 90 days during a heightened state of alert, to enable digital communication. It has implemented multiple security measures to reduce vulnerability and has 'round-the-clock' monitoring to detect and address potential disruptions immediately, without impacting customers.

Its long-term security programme includes participation in the National Telecommunications Cooperation Group (NTSG). Through this role, it participates in joint planning and preparedness, and upholds the highest security standards, with the opportunity to have a major impact on the critical national infrastructure for electronic communications.

Wind Tre has developed its Business Continuity Framework in line with the ISO: 22301:2019 standard for business continuity management and has developed BCPs for all critical processes from an economic, legal reputation, strategic or operational perspective. It identifies and implements opportunities for ongoing improvement seeking external specialist review where needed to ensure best practice. In 2024, Wind Tre implemented a structured disaster recovery process aiming to increase the resilience capabilities of the network and IT systems to ensure optimum service continuity.

HTHKH's Crisis Management Team includes the Chief Executive Officer, Chief Financial Officer, Chief Technology Officer, and representatives from business units. It conducts annual crisis drills, addressing different potential scenarios to ensure the preparedness of each team in effectively managing crises, mitigating their impact and maintaining business continuity.

ENHANCEMENTS TO BUSINESS CONTINUITY PLANNING IN WIND TRE

In 2024, Wind Tre engaged an external advisor to assess the maturity of its Business Continuity Management Framework, particularly with respect to the ISO 22301 standard. Additionally, a monitoring dashboard was built to support and strengthen business continuity management activities, providing executive inputs to support management decisions while optimising the monitoring of daily operational activities.

Moreover, Wind Tre's Disaster Recovery Programme, aimed at increasing the resilience of the telecommunications network and of IT applications to guarantee optimal service continuity, was assessed and further developed during 2024. This resulted in further integration of disaster recovery into technology business-as-usual activities, providing a standard for developing disaster recovery technical playbooks, performing disaster recovery testing, and implementing remedial actions to increase resilience.

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GHG Emissions

GHG Emissions	Units	2024	Recalculated 2023[2]	Recalculated 2022[2]
Scope 1	tCO$_2$e	16,459*	16,552	15,829
Scope 2 - market based	tCO$_2$e	313,402*	312,882	327,293
Scope 2 - location based	tCO$_2$e	439,230*	525,028	461,380
Scope 3 - total	tCO$_2$e	1,232,016*	1,304,608	1,400,383
1: Purchased goods and services	tCO$_2$e	674,951	672,394	632,861
2: Capital goods	tCO$_2$e	268,257	305,179	436,799
3: Fuel and energy related activities	tCO$_2$e	109,413	132,967	132,259
4: Upstream transportation and distribution	tCO$_2$e	15,085	15,667	24,050
5: Waste generated in operations	tCO$_2$e	242	134	70
6: Business travel	tCO$_2$e	4,634	6,611	5,852
7: Employee commuting	tCO$_2$e	7,284	7,325	8,037
8: Upstream leased assets	tCO$_2$e	19,653	31,075	27,211
9: Downstream transportation and distribution	tCO$_2$e	0	0	0
10: Processing of sold products	tCO$_2$e	0	0	0
11a: Use of sold products (Direct)	tCO$_2$e	84,445	80,737	83,309
12: End-of-life treatment of sold products	tCO$_2$e	1,072	1,525	2,711
13: Downstream leased assets	tCO$_2$e	0	0	0
14: Franchises	tCO$_2$e	2,327	3,137	1,098
15: Investments	tCO$_2$e	44,652	47,857	46,127
Total GHG emissions (scopes 1, 2 and 3)[1]	tCO$_2$e	1,561,877	1,634,042	1,743,506
Total GHG emissions intensity (scopes 1, 2 and 3)[1]	tCO$_2$e/revenue HK$'000	0.018	0.019	0.021
Total GHG emissions intensity (scope 1 and 2)[1]	tCO$_2$e/revenue HK$'000	0.004	0.004	0.004

[1]   Using scope 2 market-based emissions.
[2]   GHG data for 2023 and 2022 has been restated to reflect the acquisition of OpNet and internal audit-driven adjustments to previously disclosed figures. See page 35 for further details.

CKHGT engaged KPMG LLP to undertake independent limited assurance, reporting to CKHGT, using the assurance standards ISAE (U.K.) 3000 and ISAE 3410, for the selected GHG emissions that have been highlighted above with an *. KPMG LLP's full statement is available on page 87 of this report.

GHG data for 2024 was calculated in accordance with the CKHGT GHG. Reporting Criteria 2024.

Energy

Energy	Units	2024	Recalculated 2023[2]	Recalculated 2022[2]
Total energy consumption	MWh	1,944,587	1,908,857	1,817,698
Total direct energy consumption	MWh	49,953	51,336	51,666
Petrol	MWh	7,906	4,454	4,139
Diesel	MWh	35,201	39,450	39,172
Natural gas	MWh	5,758	6,621	7,776
Gas (excluding natural gas)	MWh	0	0	3
Solar	MWh	1,088	811	576
Total indirect energy consumed	MWh	1,894,634	1,857,520	1,766,033
Electricity	MWh	1,891,434	1,851,169	1,763,813
Heat	MWh	2,069	5,965	2,220
Self-generated and consumed from renewable sources	MWh	1,088	811	576
Purchased renewable energy consumption	MWh	1,212,638	1,120,458	1,004,100
Renewable energy percentage	Percentage	64%	61%	57%

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Water

Water	Units	2024	2023	2022
Water withdrawal total	m³	91,776	73,506	97,515
Water discharge total[3]	m³	89,388	0	0
Water consumption total[4]	m³	2,388	73,506	97,515
Water consumption intensity[4]	m³ / revenue HK$'000	0.00003	0.001	0.001

[3]   Prior to 2024, CKHGT did not record water discharge; water consumption assumed to be equal to water withdrawal.
[4]   Water consumption and intensity data comprises operations in **3** UK, HTHKH, Wind Tre and **3** Austria only in 2022 and 2023.

Network Energy Intensity

Network Energy Intensity	Units	2024	2023	2022
Total network data traffic	Petabytes (PB)	21,917	18,834	15,875
Network energy intensity	MWh/PB	85	96	108

Waste and Circular Economy

Waste and Circular Economy	Units	2024	2023	2022
Hazardous waste - total produced[5]	Tonnes	308	315	125
Non-hazardous waste - total produced[6]	Tonnes	6,427	2,468	1,822
Non-hazardous waste – recycled[6]	Tonnes	5,484	1,918	1,258
Non-hazardous waste - other management methods	Tonnes	942	550	564

Waste and Circular Economy

Waste and Circular Economy	Units	2024	2023	2022
Total waste recycled[6]	Tonnes	5,780	1,988	1,320
Network waste[7]	Tonnes	1,528	1,839	-
Percent of network waste recycled[7]	Percentage	62%	80%	-
Percentage of network equipment decommissioned in the reporting period that was repaired, reused or sold to another company (by mass)[7]	Percentage	22%	7%	-
Total number of take-back devices[7]	Number	140,281	129,238	-
Used devices collected through operator take-back schemes in the reporting period as a percentage of new mobile devices distributed directly to customers in the reporting period[7]	Percentage	3%	3%	-
Percentage of used devices collected through operator take-back schemes in the reporting period that were repaired, reused or recycled i.e. diverted from landfill or incineration[7]	Percentage	100%	98%	-

[5]   2022 and 2023 data excludes **3** Sweden, **3** Denmark and Wind Tre.
[6]   2022 and 2023 data excludes **3** Sweden and **3** Denmark.
[7]   2023 data excludes HTHKH.

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Employee Numbers[8]

	Units	2024	2023	2022
Number of employees - total	Headcount	17,359	17,491	17,214
By employment type - full time	Headcount	14,413	14,411	14,041
By employment type - part time	Headcount	2,946	3,080	3,173

Employee Demographics[8]
(Based on full-time employees only)

	Units	2024	2023	2022
By gender - male	Headcount	9,002	9,010	8,772
By gender - female	Headcount	5,411	5,401	5,269
By employee category - Manager grade or above	Headcount	999	1,873	934
By employment type - General staff	Headcount	13,414	12,538	13,107
By age group - under 30	Headcount	2,233	2,453	2,437
By age group - 30-49	Headcount	7,563	7,852	8,033
By age group - 50 or above	Headcount	4,617	4,106	3,571
By geographical region - Hong Kong	Headcount	1,020	1,061	966
By geographical region - Mainland China	Headcount	85	96	100
By geographical region - Europe and UK	Headcount	13,308	13,254	12,975

Employee Turnover[8]

	Units	2024	2023	2022
Overall	Percentage	13%	15%	16%
By gender - male	Percentage	13%	15%	16%
By gender - female	Percentage	13%	16%	15%
By age group - under 30	Percentage	37%	42%	40%
By age group - 30-49	Percentage	10%	11%	12%
By age group - 50 or above	Percentage	5%	6%	8%
By geographical region - Hong Kong	Percentage	32%	34%	45%
By geographical region - Mainland China	Percentage	21%	17%	14%
By geographical region - Europe and UK	Percentage	12%	14%	14%

Workplace Health and Safety[8]

	Units	2024	2023	2022
Work-related fatalities	Number of employees	0	0	0
Number of work days lost due to injury	Number of days	1,379	239	528
Number of lost time injury incidents	Number of incidents	36	13	100

[8]   All employee-related metrics additionally include the CK Hutchison entity 'CKH IOD', consistent with prior years.

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Training

Training	Units	2024	2023	2022
Full-time employees who received training	Percentage	78%	86%	80%
Percentage of full-time employees who received training among total trained full-time employees				
By gender - male	Percentage	60%	63%	64%
By gender - female	Percentage	40%	37%	36%
By employee category - Manager grade or above	Percentage	7%	10%	6%
By employment type - General staff	Percentage	93%	90%	94%

	Units	2024	2023	2022
Average hours of training completed by full-time employees - total	Hours	19	29	35
By gender - male	Hours	20	29	35
By gender - female	Hours	18	29	34
By employee category - Manager grade or above	Hours	22	14	27
By employment type - General staff	Hours	19	31	35

	Units	2024	2023	2022
Employees that received training on anti corruption / ethics and integrity - total	Number	10,795	9,422	6,385
By employment type - full time	Number	8,075	7,068	5,034
By employment type - part time	Number	2,720	2,354	1,351
Employees that received training on anti- corruption / ethics and integrity - percentage	Percentage	50%	43%	31%

Training

Training	Units	2024	2023	2022
Number of training hours completed on anti-corruption / ethics and integrity - total	Hours	13,326	14,343	12,554
By employment type - full time	Hours	10,491	10,972	9,780
By employment type - part time	Hours	2,836	3,372	2,774

Collective bargaining

Collective bargaining	Units	2024	2023	2022
Percentage of workforce covered by a collective bargaining agreement	Percentage	39%	38%	39%

Customers and products

Customers and products	Units	2024	2023	2022
Percentage of total products sold or shipped subject to recalls for safety and health reasons	Percentage	0%	0%	0%
Number of complaints - product related[9]	Number	40,069	356,867	47,964
Number of complaints - service related	Number	1,565,009	825,260	1,049,027

[9] The updated figure in 2023 reflects a re-categorisation of complaints by **3** Ireland.

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Suppliers	Units	2024	2023	2022
Number of suppliers	Number	13,611	12,210	7,842
By geographical region - Asia (excluding Hong Kong, Mainland China)	Number	82	35	23
By geographical region - Australia	Number	11	11	7
By geographical region - Canada	Number	17	13	4
By geographical region - Europe	Number	11,282	9,990	6,271
By geographical region - Hong Kong	Number	343	401	347
By geographical region - Mainland China	Number	339	333	369
By geographical region - New Zealand	Number	2	2	0
By geographical region - Other region	Number	71	54	25
By geographical region - United Kingdom	Number	1,302	1,240	710
By geographical region - United States	Number	162	131	86

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APPENDIX B: RECALCULATED GHG EMISSIONS DATA FOR 2021, 2022 AND 2023

This appendix shows the GHG emissions data of 2021, 2022 and 2023 that has been recalculated to align with the baseline recalculation outlined on page 35 of this report.

GHG Emissions Data Recalculated	Units	CKHGT 2021 as previously published in CKHGT Sustainability report 2023	CKHGT 2021 recalculated	CKHGT 2022 as previously published in CKHGT Sustainability report 2023	CKHGT 2022 recalculated	CKHGT 2023 as previously published in CKHGT Sustainability report 2023	CKHGT 2023 recalculated
Scope 1 total	tCO_2e	16,876	17,339	15,509	15,829	16,394	16,552
Scope 2 (market-based) total	tCO_2e	352,120	371,289	310,014	327,293	296,032	312,882
Scope 2 (location-based) total	tCO_2e	395,867	412,448	444,680	461,380	502,688	525,028
Total scope 1 and 2 (market-based) GHG emissions	tCO_2e	368,996	388,628	325,523	343,123	312,426	329,434
Total GHG emissions intensity (scope 1 and 2)	tCO_2e / revenue HK$'000	0.004	0.004	0.004	0.004	0.004	0.004
Scope 3 category 3: fuel- and energy-related activities	tCO_2e	178,486	185,193	127,408	132,259	127,770	132,967
Scope 3 category 15: Investments	tCO_2e	40,668	44,552	42,084	46,127	43,809	47,857
Scope 3 total	tCO_2e	1,787,796	1,798,387	1,391,489	1,400,383	1,295,362	1,304,608
Total GHG emissions (scopes 1, 2 and 3)	tCO_2e	2,156,793	2,187,015	1,717,012	1,743,506	1,607,788	1,634,042
Total GHG emissions intensity (scopes 1, 2 and 3)	tCO_2e / revenue HK$'000	0.023	0.024	0.021	0.021	0.019	0.019

2021: The overall effect of this recalculation has been to increase scope 1 and 2 emissions (market-based) by 5.3%, with the OpNet transaction contributing an increase of 2.3% and the internal audit adjustments contributing an increase of 3.0%; and to increase scope 3 emissions by 0.6%, with the OpNet transaction contributing an increase of 0.2% and the internal audit improvements contributing an increase of 0.4%

2022: The overall effect of this recalculation has been to increase scope 1 and 2 emissions (market-based) by 5.4%, with the OpNet transaction contributing an increase of 2.0% and the internal audit adjustments contributing an increase of 3.4%; and to increase scope 3 emissions by 0.6%, with the OpNet transaction contributing an increase of 0.2% and the internal audit improvements contributing an increase of 0.4%

2023: The overall effect of this recalculation has been to increase scope 1 and 2 emissions (market-based) by 5.5%, with the OpNet transaction contributing an increase of 1.7% and the internal audit adjustments contributing an increase of 3.8%; and to increase scope 3 emissions by 0.7%, with the OpNet transaction contributing an increase of 0.2% and the internal audit improvements contributing an increase of 0.5%

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APPENDIX C: GRI INDEX

Statement of use	CKHGT has reported the information cited in this GRI content index for the period from 1 January 2024 to 31 December 2024 with reference to the GRI Standards.
GRI 1 used	GRI 1: Foundation 2021
Disclosure type	Partial

GRI Standard	Disclosure	Location
GRI 2 - General Disclosures	2-1 Organisational details	About CKHGT (p. 3)
	2-2 Entities included in the organisation's sustainability reporting	Independent auditor's report (CKHGT annual report p. 24)
	2-3 Reporting period, frequency and contact point	About this report (p. 7) Results for the year ended 31 December 2024 (CKHGT annual report p. 1)
	2-5 External assurance	Assurance statement (p. 87)
	2-6 Activities, value chain and other business relationships	Double materiality assessment (p. 10)
	2-7 Employees	Appendix A: Environmental and social key performance indicators (p. 81)
	2-9 Governance structure and composition	Corporate Governance Report (CKHH annual report p. 113)
	2-10 Nomination and selection of the highest governance body	Nomination Process (CKHH annual report p. 111)
	2-11 Chair of the highest governance body	Nomination Process (CKHH annual report p. 111)
	2-14 Role of the highest governance body in sustainability reporting	Sustainability at CKHGT (p. 8)
	2-19 Remuneration policies	Remuneration of directors and senior management (CKHH annual report p. 115-116)
	2-20 Process to determine remuneration	Remuneration of directors and senior management (CKHH annual report p. 115-116)
	2-22 Statement on sustainable development strategy	Message from the Chairperson (p. 5-6)

GRI Standard	Disclosure	Location
GRI 2 - General Disclosures	2-23 Policy commitments	Governance policies (CKHH annual report p. 107-109)
	2-29 Approach to stakeholder engagement	Sustainability at CKHGT (p. 9)
	2-30 Collective bargaining agreements	Appendix A: Environmental and social key performance indicators (p. 82)
GRI 3 - Material Topics	3-1 Process to determine material topics	Sustainability at CKHGT (p. 10)
	3-2 List of material topics	Sustainability at CKHGT (p. 11-12)
	3-3 Management of material topics	Sustainability at CKHGT (p. 10)
GRI 201 - Economic Performance	201-1 Direct economic value generated and distributed	CKHGT - Results by operations (CKHGT annual report p. 7)
	201-2 Financial implications and other risks and opportunities due to climate change	Climate change risk management and scenario analysis (p. 32)
GRI 203 - Indirect Economic Impacts	203-1 Infrastructure investments and services supported	Next generation networks and connectivity solutions (p. 17-21)
GRI 302 - Energy	302-1 Energy consumption within the organisation	GHG footprint and performance (p. 34) Appendix A: Environmental and social key performance indicators (p. 80)
	302-3 Energy intensity	Appendix A: Environmental and social key performance indicators (p. 79)
GRI 303 - Water and Effluents	303-3 Water withdrawal	Appendix A: Environmental and social key performance indicators (p. 80)
	303-4 Water discharge	Appendix A: Environmental and social key performance indicators (p. 80)
	303-5 Water consumption	Appendix A: Environmental and social key performance indicators (p. 80)

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GRI Standard	Disclosure	Location
GRI 305 - Emissions	305-1 Direct (Scope 1) GHG emissions	GHG footprint and performance (p. 34) Appendix A: Environmental and social key performance indicators (p. 79)
	305-2 Energy indirect (Scope 2) GHG emissions	GHG footprint and performance (p. 34) Appendix A: Environmental and social key performance indicators (p. 79)
	305-3 Other indirect (Scope 3) GHG emissions	GHG footprint and performance (p. 37) Appendix A: Environmental and social key performance indicators (p. 79)
	305-4 GHG emissions intensity	GHG footprint and performance (p. 36) Appendix A: Environmental and social key performance indicators (p. 80)
	305-5 Reduction of GHG emissions	GHG reduction strategy (p. 38) Appendix A: Environmental and social key performance indicators (p. 79)
GRI 306 - Waste	306-1 Waste generation and significant waste-related impacts	End-of-life product management and refurbished devices (p. 45)
	306-2 Management of significant waste-related impacts	End-of-life product management and refurbished devices (p. 45-48)
	306-3 Waste generated	Appendix A: Environmental and social key performance indicators (p. 80)
	306-4 Waste diverted from disposal	Appendix A: Environmental and social key performance indicators (p. 80)
	306-5 Waste directed to disposal	Appendix A: Environmental and social key performance indicators (p. 80)
GRI 403 - Occupational Health and Safety	403-1 Occupational health and safety management system	Health and safety (p. 75)
	403-9 Work-related injuries	Appendix A: Environmental and social key performance indicators (p. 81)

GRI Standard	Disclosure	Location
GRI 404 - Training and Education	404-1 Average hours of training per year per employee	Appendix A: Environmental and social key performance indicators (p. 82)
	404-2 Programs for upgrading employee skills and transition assistance programs	Employee learning and development (p. 57)
GRI 405 - Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	Appendix A: Environmental and social key performance indicators (p. 81)

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APPENDIX D: ASSURANCE STATEMENT

Independent Practitioner's Limited Assurance Report to CK Hutchison Group Telecom Holdings Limited

KPMG LLP ("KPMG" or "we") were engaged by CK Hutchison Group Telecom Holdings Limited ("CKHGTH") to provide limited assurance over the Selected Information described below for the year ended 31 December 2024.

Conclusion

We have performed a limited assurance engagement on whether Selected Information in CKHGTH's Sustainability Report (the "Report") for the year ended 31 December 2024 has been properly prepared in accordance with the "Reporting Criteria". The Reporting Criteria we used to form our judgements are CKHGTH's Greenhouse Gas Reporting Criteria (2024) as set out at:

https://www.ckhutchisontelecom.com/en/sustainability/sustainabilityreports.php

The information within the Report that was subject to assurance is indicated with the symbol * (the "Selected Information") (and is also listed in Appendix 1).

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the Selected Information has not been properly prepared, in all material respects, in accordance with the Reporting Criteria.

Our conclusion is to be read in the context of the remainder of this report, in particular the "Inherent limitations in preparing the Selected Information" and "Intended use of our report" sections below.

Our conclusion on the Selected Information does not extend to other information that accompanies or contains the Selected Information and our assurance report (hereafter referred to as "Other Information"). We have not performed any procedures with respect to the Other Information.

Basis for conclusion

We conducted our engagement in accordance with International Standard on Assurance Engagements (UK) 3000 *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ("ISAE (UK) 3000") issued by the Financial Reporting Council ("FRC") and, in respect of the greenhouse gas emissions information included within the Selected Information, in accordance with International Standard on Assurance Engagements 3410 *Assurance Engagements on Greenhouse Gas Statements* ("ISAE 3410") issued by the International Auditing and Assurance Standards Board ("IAASB"). Our responsibilities under those standards are further described in the "Our responsibilities" section of our report.

We have complied with the Institute of Chartered Accountants in England and Wales ("ICAEW") Code of Ethics, which includes independence and other ethical requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality

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and professional behaviour, that are at least as demanding as the applicable provisions of the International Ethics Standards Board for Accountants ("IESBA") International Code of Ethics for Professional Accountants (including International Independence Standards).

Our firm applies International Standard on Quality Management (UK) 1 *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements* ("ISQM (UK) 1"), issued by the FRC, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Inherent limitations in preparing the Selected Information

The nature of non-financial information; the absence of a significant body of established practice on which to draw; and the methods and precision used to determine non-financial information, allow for different, but acceptable, evaluation and measurement techniques and can result in materially different measurements, affecting comparability between entities and over time.

The greenhouse gas ("GHG") emissions quantification process is subject to scientific uncertainty, which arises because of incomplete scientific knowledge about the measurement of GHGs; and estimation (or measurement) uncertainty resulting from the measurement and calculation processes used to quantify emissions within the bounds of existing scientific knowledge.

For Scope 3 GHG emissions categories 1, 2 and 4, there are also significant limitations in the availability and quality of GHG emissions data from third parties, resulting in CKHGTH's reliance on proxy data in determining estimated Scope 3 GHG emissions. Over time better information may become available from third parties and the principles and methodologies used to measure and report Scope 3 GHG emissions may change based on market practice and regulation.

The Reporting Criteria has been developed to assist CKHGTH in preparing the Selected Information included in the Report. As a result, the Selected Information may not be suitable for another purpose.

Directors' responsibilities

The Directors of CKHGTH are responsible for:

- designing, implementing and maintaining internal controls relevant to the preparation and presentation of the Selected Information that is free from material misstatement, whether due to fraud or error;

- selecting and developing suitable Reporting Criteria;

- properly preparing the Selected Information in accordance with the Reporting Criteria; and

- the contents and statements contained within the Report and the Reporting Criteria.

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Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the Selected Information is free from material misstatement, whether due to fraud or error;

- forming an independent limited assurance conclusion, based on the procedures we have performed and the evidence we have obtained; and

- reporting our conclusion to CKHGTH.

Summary of the work we performed as the basis for our conclusion

We exercised professional judgment and maintained professional scepticism throughout the engagement. We planned and performed our procedures to obtain evidence that is sufficient and appropriate to obtain a meaningful level of assurance over the Selected Information to provide a basis for our limited assurance conclusion. Planning the engagement involves assessing whether CKHGTH's Reporting Criteria are suitable for the purposes of our limited assurance engagement. Our procedures selected depended on our judgement, on our understanding of the Selected Information and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise.

In carrying out our engagement, we performed procedures which included:

- obtaining an understanding of CKHGTH's control environment, processes and information systems relevant to the preparation of the Selected Information, but did not include evaluating the design of particular control activities, obtaining evidence about their implementation or testing their operating effectiveness;

- carrying out selected testing remotely over location-level Selected Information for three locations;

- performing selected limited substantive testing in relation to the above locations, including agreeing a selection of the Selected Information to corresponding supporting information including meter reports and invoices but did not include testing the calibration of meters, reperforming meter readings, or physical visits to the sites which provided source data for the Selected Information;

- considering the appropriateness of the carbon conversion factor calculations and other unit conversion factor calculations used by reference to widely recognised and established conversion factors;

- reperforming a selection of the carbon conversation factor calculations and other unit conversion factor calculations;

- performing analytical procedures over the aggregated Selected Information, including a comparison to the prior period's amounts having due regard to changes in business volume and the business portfolio;

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- evaluating whether CKHGTH's methods for developing key estimates were appropriate and had been consistently applied, but did not include testing the data on which the estimates are based or separately developing our own estimates against which to evaluate CKHGTH's estimates; and

- reading the Report with regard to the Reporting Criteria and for consistency with our findings over the Selected Information.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Intended use of our report

Our report has been prepared for CKHGTH solely in accordance with the terms of our engagement. We have consented to the publication of our report for the purpose of CKHGTH showing that it has obtained an independent assurance report in connection with the Selected Information.

Our report was designed to meet the agreed requirements of CKHGTH determined by CKHGTH's needs at the time. Our report should not therefore be regarded as suitable to be used or relied on by any party wishing to acquire rights against us other than CKHGTH for any purpose or in any context. Any party other than CKHGTH who obtains access to our report or a copy and chooses to rely on our report (or any part of it) will do so at its own risk. To the fullest extent permitted by law, KPMG LLP will accept no responsibility or liability in respect of our report to any other party.

KPMG LLP

KPMG LLP
Chartered Accountants
15 Canada Square, London, E14 5GL
9 September 2025

The maintenance and integrity of CKHGTH's website is the responsibility of the Directors of CKHGTH; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported Selected Information, Reporting Criteria or Report presented on CKHGTH's website since the date of our report.

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Appendix 1 – Selected Information

Metric	Assured value
Scope 1 GHG emissions, tCO2e	16,459
Scope 2 GHG market-based emissions, tCO2e	313,402
Scope 2 GHG location-based emissions, tCO2e	439,230
Scope 3 emissions, tCO2e	1,232,016

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