CK HUTCHISON GROUP TELECOM HOLDINGS LIMITED

(Incorporated in the Cayman Islands with limited liability)

Building A Resilient Business

and Sustainable Digital Society

SUSTAINABILITY REPORT 2025

INSIDE THIS REPORT

INTRODUCTION

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 around the world.

During the reporting period (1 January to 31 December 2025), it operated in seven markets: Italy, Sweden, Denmark, Austria, Ireland, Hong Kong SAR and Macau SAR.

It forms part of CK Hutchison Holdings Limited (CKHH, CKHH Group or the Group) - 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 almost 5.4 million active customer connections.

3 Sweden ▸ Sweden's fastest growing mobile operator with 2.8 million subscriptions, providing coverage for more than 92% of Sweden's population.

3 Denmark ▸ A growing mobile network provider with over 1.7 million active customers and 99% 5G coverage.

Wind Tre ▸ A multi-service operator that offers connectivity, energy and insurance products[4]. The number one mobile operator in Italy, with 18.0 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 2.7 million active customers. Multiple award winner in Connect rankings in 2025[2] and reaching 95% outdoor 5G coverage by the end of 2025.

Hutchison Telecommunications Hong Kong Holdings Limited (HTHKH)
▸ A leading mobile telecommunications operator that provides services in Hong Kong and Macau with approximately 3.4 million active customers, providing 5G coverage to 99% of the Hong Kong population as at the end of 2025.[3]

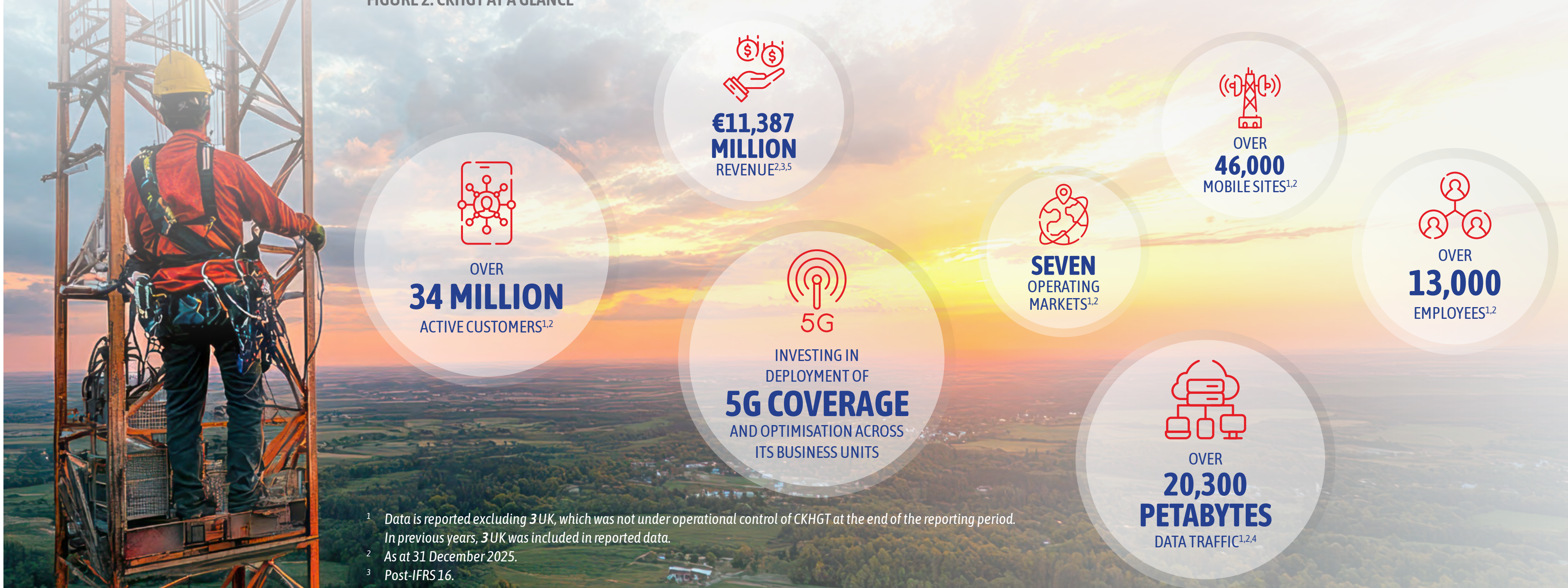
1 All customer numbers are as at 31 December 2025.
2 Awards for service and mobile B2B set out here.
3 HTHKH completed the sale of its entire interests in a subsidiary which engages in the mobile telecommunications business in Macau on 12 January 2026.
4 Energy and insurance services offered by third-party 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).

OUR PURPOSE

CKHGT plays an essential role in enabling a sustainable digital society. It connects over 34 million customers 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 improved living standards, through its connectivity, digital solutions and the use of artificial intelligence (AI).

At the same time, it acts as a responsible business, delivering the climate transition through its operations and value chain, implementing business models and solutions to enable the circularity of telecommunication devices and network equipment, and growing products and services that create positive impact.

FIGURE 2: CKHGT AT A GLANCE



1 *Data is reported excluding* ***3*** *UK, which was not under operational control of CKHGT at the end of the reporting period. In previous years,* ***3*** *UK was included in reported data.*
2 *As at 31 December 2025.*
3 *Post-IFRS 16.*
4 *Data traffic is reported as a total for all fixed and mobile networks.*
5 *See CKHGT 2025 Annual Results.*

MESSAGE FROM THE CHAIRPERSON

"Macro-economic, geopolitical and regulatory conditions continue to evolve, alongside rapid changes in how digital technologies are developed and used. In this context, CK Hutchison Group Telecom Holdings Limited (CKHGT) remains focused on understanding and managing its sustainability impacts, risks and opportunities to support business resilience and long-term value creation. Sustainability considerations are embedded within our strategy and governance, informing decisions across our businesses."

3 Austria headquarters

In 2025, we continued to make progress against our climate commitments and are on track towards our near-term science-based greenhouse gas (GHG) reduction targets. We reduced our scope 1 and 2 GHG emissions footprint by 14% versus 2024, through an increase in purchased renewable electricity and continued investment in network energy efficiency. We reduced our scope 3 emissions by 6% compared to 2024. Our supplier engagement programme remains an important element of our strategy, extended in 2025 with a bespoke GHG data request and a capacity-building session for suppliers.

We also advanced our ambition to reach net-zero emissions across scopes 1, 2 and 3 by 2050, with long-term targets validated by the SBTi. In future years we aim to continuously enhance our climate transition plan with further detail on our decarbonisation levers and pathway. We also recognise the potential for changing requirements through the review of the Greenhouse Gas Protocol, which we will continue to monitor.

Innovation continues to be a key enabler of both sustainability and performance. Across our businesses, artificial intelligence and advanced analytics are being deployed to optimise network operations, improve energy efficiency and enhance customer experience, while strong governance frameworks ensure AI is used responsibly and ethically.

At the same time, we are developing next-generation connectivity and digital solutions that support safer, smarter and more resilient communities, from critical infrastructure and industrial applications to consumer digital safety initiatives. We are also responding to the growing challenge of resource use and e-waste by expanding circular product offerings that encourage repair, reuse and recycling of devices at end-of-life and by continuing to explore opportunities to expand competitive refurbished device offers across our operating markets.

Our people remain central to our progress, and during the year we strengthened sustainability training and engagement across our operations. Aligning with CKHH's strategic initiative to incorporate environmental, social and governance (ESG) performance metrics into its leadership remuneration framework, this year CKHGT introduced ESG targets into its leadership short-term incentive plan. Building on this successful implementation CKHGT is refining and extending the framework to include long-term incentives, aiming to drive longer-term positive outcomes in addition to year-on-year performance.

For the second consecutive year CKHGT was included in Sustainalytics' Top-Rated ESG Companies List. We also achieved a score of A- in our sixth consecutive annual CDP submission - an improvement from the previous score of B, and were awarded a silver medal in our first EcoVadis assessment.

Looking ahead, our businesses have a significant programme of work to prepare for reporting in line with the EU's Corporate Sustainability Reporting Directive (CSRD) and ensuring compliance with the Corporate Sustainability Due Diligence Directive (CSDDD). This will build upon the strong foundations already in place, including preparatory work already undertaken, and will be progressed collaboratively across the CKHH Group.

I would like to thank all colleagues and team members across CKHGT for their continued commitment and dedication.

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

3 September 2026

ABOUT THIS REPORT

This report 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 2025 (the reporting period). Previous years' GHG emissions figures presented in this report have been recalculated in light of business transactions during the year, and refinements to calculation methodologies. As a result, these figures may differ from those previously disclosed. Further details on the recalculations are provided on page 76 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.

On 31 May 2025, a merger was completed between **3** UK and Vodafone UK, creating VodafoneThree, in which CKHGT retained a 49% interest. On 30 July 2026, CKHGT fully disposed of its remaining 49% interest in VodafoneThree. Collectively these events are referred to throughout this report as '**the VodafoneThree transaction**'. The GHG emissions of **3** UK have been fully removed from the CKHGT GHG footprint for 2025 and no activities of VodafoneThree are included in this report. The treatment of the VodafoneThree transaction is further discussed in the section 'GHG Emissions Recalculation' of this report.

On 12 January 2026, HTHKH completed the sale of its entire interest in a subsidiary which engages in the mobile telecommunications business in Macau. Since the Macau business was still owned by HTHKH during the reporting period, it is included in the scope of this report.

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 109 of this report.

Reporting frameworks

- **UN Global Compact**
  The parent of CKHGT, CKHH, continues to be a signatory of the UN Global Compact, a voluntary, multi-stakeholder platform upholding ten principles on human rights, labour, environment and anti-corruption. A number of CKHGT business units (for example Wind Tre, **3** Denmark, **3** Austria and **3** Sweden) have also taken up direct membership as subsidiaries.

- **The Stock Exchange of Hong Kong Limited ESG Reporting Code**
  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 (ESG) Reporting Code.

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

- **Global System for Mobile Communications Association (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.

PROGRESS HIGHLIGHTS

RESPONSIBLE AND RESILIENT BUSINESS

- CKHGT was included in Sustainalytics' Top-Rated ESG Companies List and awarded ESG Top-Rated badges for its industry and region for the second year in a row.
- CKHGT received a score of A-, an improvement from the previous score of B, in its sixth consecutive annual submission to CDP – the world's largest environmental disclosure system.
- CKHGT received a silver medal from EcoVadis in its first assessment, ranking in the top 7% of all companies assessed in the prior year.
- Wind Tre further improved its score with EcoVadis achieving an 'outstanding' category rating and maintaining its place in the top 1% of telecommunications sector companies globally.
- HTHKH was awarded the 2025 ESG Grand Award at the ESG Awards 2025 organised by Master-Insight.com and The Research Centre for ESG at The Hang Seng University of Hong Kong. It also received the ESG Excellence Award from the Chamber of Hong Kong Listed Companies and the Centre for Corporate Governance and Financial Policy of the Hong Kong Baptist University.
- CKHGT implemented ESG targets into its leadership short-term incentive plan, representing 10% of the overall short-term incentive plan.
- **3** Ireland achieved the ISO 27001: Information Security Management System (ISMS) certification over its Internet of Things (IoT) management platform and IoT connectivity managed by the platform, with Wind Tre and **3** Austria also retaining their certifications.
- All business units now have AI Committees providing oversight of responsible AI use and delivering AI training to employees. All European business units developed or enhanced dedicated online AI training during the year.
- **3** Sweden integrated generative AI into chatbot customer journeys, enhancing efficiency and delivering a positive customer experience.

DIGITAL SOLUTIONS AND IMPACT

- Working with Northern Gas Networks, CKDelta deployed a real-time IoT Lakehouse to support the UK's first integrated, domestic-scale research environment for gas, electricity and water, providing a scalable, well-governed platform for real-world Net Zero analysis and future AI-driven insights.
- CKH Innovations Opportunities Development Limited (CKH IOD) launched the UK's largest private 5G network at the ports of Felixstowe, Harwich and London Thamesport, supporting autonomous electric vehicles and for port efficiency.
- Wind Tre launched 5G Standalone and offered network slicing, supporting advanced use cases in smart mobility, urban security, smart industry and digital healthcare.
- **3** Austria implemented Austria's first 5G private slice network with edge computing at the 5G Playground Carinthia, enabling real-world testing and validation of 5G applications by companies and research institutions.
- **3** Ireland supported over 3.5 million IoT connections and maintained a leadership in integrated IoT solutions.
- Wind Tre signed nine new 'smart cities' agreements expanding the programme to 50 Italian cities.
- CKHGT continued to extend and scale its innovative Digital Identity solution, 'Subscriber Intelligence', launching new network-based verification services in **3** Ireland and Wind Tre.
- **3** Austria introduced the 'Safe' initiative for families, including practical mobile safety support for parents instore, partnership with the Austrian parental control app Ohana, and collaboration with platform 'LAOLA 1' to produce an online safety video series.
- Wind Tre reached 113 signed memoranda of understanding with small villages since the 2021 launch of its 'Connected Villages' project, aimed at reducing the digital divide between Italy's rural villages and cities.

ENVIRONMENTAL TRANSITION AND RESILIENCE

- Scope 1 and 2 (market-based) emissions decreased by 39% against the baseline year of 2020 and are on track towards CKHGT's near-term science-based scope 1 and 2 reduction target.
- Renewable electricity for CKHGT grew from 57%[1] in 2024 to 61% in 2025.
- Business units continued to deploy AI-driven network hardware and software solutions to optimise network performance and energy efficiency.
- HTHKH entered into a collaboration with Huawei International Co. Limited to enhance network operations, efficiency and customer experience through AI, big data and cloud transformation.
- **3** Sweden completed its programme of 3G decommissioning and measured a significant reduction in network energy intensity since 2021 reflecting all network energy efficiency investments.
- CKHGT expanded its supplier engagement with targeted data requests and a capacity-building session delivered to suppliers.
- Wind Tre and **3** Denmark expanded their circular device offerings with the launch of flexible insurance designed to support device repair and replacement of devices, including with refurbished devices in the event of damage, and supporting a longer lifetime of devices in use.
- **3** Austria launched 'Handyfreiheit' or 'Mobile Phone Freedom', a circular product offer making premium smartphones more affordable and promoting sustainability.

WORKFORCE CAPABILITY AND COMMUNITIES

- CKHGT business units received recognition for employer brand and experience, including 'Career Company 2026' for **3** Sweden for the 13th consecutive year, 'Top Employer Italy' for Wind Tre for the 8th consecutive year, and **3** Ireland ranking 17th in the Irish Independent Best Employers 2025 (6th among tech companies).
- Business units received recognition for inclusion and diversity including **3** Ireland's Investors in Diversity Gold Mark for 2023-2025 awarded by the Irish Centre for Diversity, Wind Tre as a 'Diversity Leader in Europe 2025' by Statista and the Financial Times, and **3** Austria's 'equalitA' gender equality seal of approval from the Austrian Federal Ministry for Digital and Economic Affairs.
- Wind Tre maintained its UNI/PdR 125 certification, a national certification that promotes and protects diversity and equal opportunities in the workplace.
- CKHGT maintained its 'future-ready' workforce with AI training offered across all business units and new AI training developed across all European business units in 2025.
- CKHGT's commitment to sustainability training and engagement with employees was significantly expanded with launch of new training in **3** Denmark, **3** Sweden and Wind Tre.

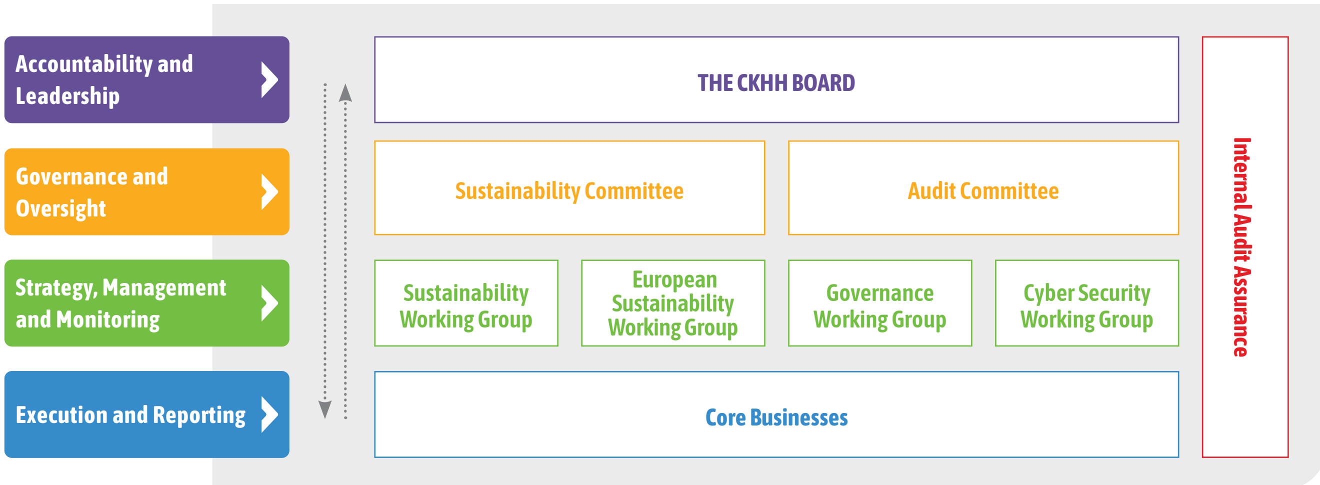
[1] Based on recalculated energy consumption data as outlined on page 69

SUSTAINABILITY GOVERNANCE AND REPORTING

SUSTAINABILITY GOVERNANCE

Sustainability governance in CKHGT sits within the comprehensive governance structure of CKHH. The CKHH integrated governance structure is implemented to oversee the CKHH sustainability strategy, monitor performance, and provide assurance across all divisions, helping to ensure that environmental and social considerations are integrated into the CKHH Group's corporate governance practices.

CKHH's integrated governance structure



The structure includes the CKHH Board-level Sustainability Committee and CKHH Sustainability Working Group, which is co-chaired by two CKHH Executive Directors and includes senior executives from key departments that influence the Group's sustainability approach and performance.

For further detail on integrated governance across the CKHH Group, see the CKHH Sustainability Report 2025.

The CKHGT Board, led by the Executive Chairman and Managing Director, Mr Canning Fok, is responsible for approving the CKHGT Sustainability Report. The CKHGT Policy Board reports to the Board of CKHGT and is an executive decision-making body. Its membership includes Chief Executive Officers (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 operating under CKHGT. The CKHGT Policy Board is responsible for approving the CKHGT Sustainability Strategy and key strategic projects. 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. In 2025, CKHGT held its fourth 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, reporting to the CEO of CKH IOD, chairs the Network and the CKHH European Sustainability Working Group to facilitate knowledge-sharing and collaboration with other CKHH divisions. The Head of Sustainability also presents on European progress and key developments to the CKHH Sustainability Working Group on a quarterly basis.

Sustainability performance-linked appraisal

CKHH has adopted a strategic initiative to incorporate ESG performance metrics into its leadership remuneration framework. This builds upon CKHH's established performance appraisal system, which provides all employees with structured feedback on their achievements and development areas, including in areas related to sustainability where relevant for their role.

In 2025, CKHGT implemented ESG targets into its leadership short-term incentives, representing 10% of the overall short-term incentive. These targets covered a variety of topics including supplier ESG assessments, female representation in management, number of employee training hours, scope 1 and 2 GHG reduction targets, renewable electricity procurement, and more. Building on this successful implementation CKHGT is refining its short-term incentive framework for 2026 and extending the framework to include long-term incentives (over a rolling three-year period) to drive longer-term positive outcomes in addition to year-on-year performance.

Wind Tre has a range of metrics in addition to the CKHGT framework, including a 'composite index' of governance targets, linked to the objectives in its local sustainability strategy. Wind Tre's ESG targets impact 15% of the short-term incentive. Additionally, for executives, a modified version of the ESG targets (including the GHG reduction target) is linked to the long-term incentive.

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 on a programme of regulation and strategy across a range of topics related to sustainability standards and reporting. Three key elements of this regulatory programme, and of importance for CKHGT, are the Corporate Sustainability Reporting Directive (CSRD) including its requirement to report according to the European Sustainability Reporting Standards (ESRS), the EU Taxonomy Regulation, and the Corporate Sustainability Due Diligence Directive (CSDDD).

CSRD

The CSRD is an EU regulation that requires companies to disclose standardised, detailed information on their ESG performance. Its purpose is to improve the transparency, consistency, and comparability of sustainability data across organisations, enabling investors, regulators, and other stakeholders to make better-informed decisions.

EU Taxonomy

The EU Taxonomy is a classification system established by the EU to define which economic activities can be considered environmentally sustainable. It provides criteria for businesses and investors to identify activities that contribute to one or more of the EU's environmental objectives, while avoiding significant harm to the other objectives, and meeting minimum social safeguards. By standardising what counts as 'green', the EU Taxonomy helps guide investment towards more sustainable activities.

CSDDD

The CSDDD is an EU regulation that requires companies to identify, prevent, mitigate, and account for adverse human rights and environmental impacts across their operations and value chains. Its purpose is to encourage companies to take a proactive and structured approach to managing sustainability risks and impacts, strengthening transparency and accountability over their operations and value chains.

In 2024, CKHGT reported on its significant programme of work to prepare for these requirements, including mapping of its value chain and full double materiality analysis in line with the requirements of the ESRS.

In 2025, the European Commission introduced an 'Omnibus Simplification Package', to simplify, harmonise and ease the compliance burden associated with the new sustainability reporting and due diligence requirements. CKHGT monitored these developments closely and participated in industry sessions to remain updated on key developments, including a consultation between European Financial Reporting Advisory Group (EFRAG) representatives and GSMA members. CKHGT also commenced a refresh of its double materiality analysis to reflect any changes in context and expected practice.

CKHGT has also reported in detail on its EU Taxonomy progress in prior reporting years, including its work to identify the economic activities against which it expects to have 'eligible' capital expenditure, operating expenditure and revenues. During 2025, the EU Taxonomy requirements were updated. CKHGT plans to fully review and refresh its assessment against the EU Taxonomy during 2026, in preparation for collecting data as required for the 2027 financial year.

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
- Customers
- Suppliers and business partners
- Bond investors
- Banks and creditors
- Governments and regulators
- Local communities
- Non-government organisations (NGOs)
- CKHH

CKHGT actively participates in global and regional industry and standardisation bodies, playing a central role in industry dialogue on technology, policy, and sustainability. It has senior representation within the Global System for Mobile Communications Association (GSMA)[2], including the Technology Group, Strategy Group and Policy Group, and contributes to the GSMA Climate Action Working Group, Sustainability Network, European Union (EU) Sustainability Policy Group and Circular Devices Working Group.

In addition, CKHGT contributes to the development of global mobile standards through participation in the 3rd Generation Partnership Project (3GPP), helping to shape standards that support network efficiency, security, and long-term sustainability, and participates in European Telecommunications Standards Institute (ETSI) technical and governance activities, supporting European and international ICT standardisation and regulatory alignment.

The parent of CKHGT, CKHH, is a member of the IFRS Sustainability Alliance, a membership programme for investors, companies and advisors to hone their expertise, share knowledge and prepare to meet the future of sustainability disclosure to inform capital markets.

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.

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 • Online training	• 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, messaging apps • Mobile applications and platforms • 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 • Accessibility • Decarbonisation • Responsible business conduct • Supply chain responsibility
Government / regulators	• Circulars and guidelines • Compliance reporting • 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 • On-site inspections	• Financial information • ESG disclosure • Data privacy and cyber security • AI and new technology • Network rollout • Security and resilience
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 • Competitiveness

[2] The GSMA is a global organisation unifying the mobile ecosystem to discover, develop and deliver innovation that helps business and society thrive. More information on: www.gsma.com.

Stakeholder group	Mechanisms for engagement	Priority topics for stakeholder group from engagement
Suppliers and business partners	• Supplier reviews and assessments • Supplier meetings • Supplier questionnaires and surveys • Rating agencies' questionnaires • Sales events, fora and seminars • Supplier training and online webinars • Audits, on-site visits and privacy compliance checks • Partnership initiatives • Annual and sustainability reports	• 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 • Training for local administrations	• Digital inclusion • Data privacy and cyber security

Double materiality assessment

As outlined under 'Preparing for sustainability regulation', CKHGT performed a full double materiality analysis during 2024. This was assisted by a third-party adviser and followed a comprehensive process aligned with the requirements of the ESRS, developed by EFRAG. In 2025, the analysis was refreshed through review of recent external developments (for example, peer sustainability reports and 'wave 1' CSRD Sustainability Statements[3], GSMA developments and publications) and a dedicated internal workshop of the CKHGT Sustainability and Climate Change Network to reassess and reconfirm scoring and prioritisation given in 2024.

FIGURE 4: DOUBLE MATERIALITY ANALYSIS: PREPARATION FOR CSRD

Value chain mapping

The materiality assessment 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, shown in figure 5.

Stakeholder engagement

CKHGT assimilated the results of stakeholder engagement conducted by business units. Some of this engagement was designed specifically to assess the topics of the ESRS, while other engagement was broader in scope, with stakeholder concerns subsequently mapped to the topics of the ESRS to form an aggregate view.

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

[3] Those companies that were required to report according to the EU's Corporate Sustainability Reporting Directive for the FY24 reporting year based on thresholds outlined in that Directive.

FIGURE 4: DOUBLE MATERIALITY ANALYSIS: PREPARATION FOR CSRD

Desktop research

Detailed desktop 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; and
- CKHGT information including previous materiality assessments and reporting.

Prioritisation of topics

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.

FIGURE 5: CKHGT CORE VALUE CHAINS – TELECOMMUNICATION SERVICES (CONNECTIVITY) AND DEVICES

Telecommunications services

Value chain stage	Upstream	Own Operations	Downstream
Key primary activities	Raw material extraction	Mobile and fixed networks	Use of products and services
	Manufacturing	Core network and data centre management	Circularity and end-of-life
		Product and services	
		Marketing, sales and customer engagement	

Devices

Value chain stage	Upstream	Own Operations	Downstream
Key primary activities	Raw material extraction	Marketing, sales and customer engagement	Outbound transportation and logistics
	Manufacturing	Logistics	Use of products and services
	Inbound transportation and logistics		Circularity and end-of-life

Material topics identified through this process are shown in figure 6, and described for the first time in accordance with the draft simplified ESRS. CKHGT continues to closely monitor the amendments to, and finalisation of the ESRS. The identified material topics may change in future years if there are changes to material topic descriptions or definitions in the finalised ESRS, and as external factors and business priorities change over time.

FIGURE 6: CKHGT MATERIAL TOPICS

RESPONSIBLE AND RESILIENT BUSINESS

Material topics:

Cyber security

The threat of cyber-attacks has significantly increased in recent years and continues to evolve as technologies change. This is evidenced by the many high-profile incidents involving loss of customer data causing financial harm and service disruption to customers, as well as the high costs for business from operational disruption, recovery and remediation.

This topic arises not only in direct operations, but also in the supply chain, upon which companies often depend for systems implementation and management.

Responsible AI

The increasing use of AI creates both significant opportunities and responsibilities for companies. As AI becomes more embedded in business activities, stakeholders expect organisations to ensure that AI systems are developed and used in a responsible, ethical and secure manner. This includes robust governance, clear policies and effective risk management to address potential impacts and ensure appropriate oversight of AI technologies, while embracing the opportunities possible with the technology.

Supply chain responsibility

All large businesses have a responsibility to understand and manage ESG 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. Impacts to workers in upstream supply chains, if not managed by suppliers, can include erosion of human rights, poor working conditions, and impacts to health and safety. Significant incidents can also cause reputational risks for business. Businesses are expected to identify and manage these impacts and 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. Failure to uphold customer rights to data privacy can result in data breaches, potentially causing stress and financial losses for customers, as well as financial penalties and reputational impacts on business. 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.

Business continuity and resilience

A range of factors, including extreme weather events, cyber-attacks, and sabotage, have the potential to cause disruption to telecommunications services, with impacts to customers and business costs of recovery and repair, as well as potential reputational risks if appropriate resilience measures are not in place.

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.

DIGITAL SOLUTIONS AND IMPACT

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 IoT technologies enable more efficient customer operations, smarter cities, and GHG savings, or where AI-enabled products and services can support increased efficiency and improved customer outcomes.

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 on customers and communities by offering products, services and education programmes to mitigate these impacts, and by building digital infrastructure and capabilities to support digital inclusion and digital safety. The particular needs and solutions differ across markets.

Customer responsibility

As an essential service provider, telecommunications companies must maintain fair and ethical customer practices, support accessibility of products and services, and focus on customer service excellence with feedback mechanisms for customers including complaints mechanisms. Failure to do so can potentially lead to financial penalties and reputational impacts.

FIGURE 6: CKHGT MATERIAL TOPICS

ENVIRONMENTAL TRANSITION AND RESILIENCE

Material topics:

Climate change mitigation

CKHGT is committed to addressing the urgent challenge of climate change, in line with the objectives of the Paris Agreement to limit global warming to 1.5°C. The transition to a low-carbon economy presents material risks for businesses that do not take action consistent with the expectations of investors, customers and governments. It is therefore essential for businesses to develop robust climate transition plans, aligned with best-practice standards, to identify and manage climate-related risks and opportunities. These plans should include clear decarbonisation pathways to drive absolute reductions across scope 1, 2 and 3 GHG emissions.

Climate change adaptation

Climate change is already affecting the frequency and severity of extreme weather events, including heatwaves, flooding and storms. These climate hazards are expected to intensify over time, with impacts varying by geography. As a provider of services that rely on critical infrastructure, CKHGT has a responsibility to understand and manage climate-related impacts, risks and opportunities within its strategy and business model. This is essential to minimise the risk of service disruption, increased repair costs and potential impacts to reputation, requiring the implementation of appropriate resilience measures to address the physical risks of climate change.

Energy management

Energy management is important for the telecommunications sector due to the energy-intensive nature of network operations and the continued growth in data traffic. Network energy consumption is a driver of operating costs and a major source of sector-related GHG emissions. Rising energy demand, price volatility and evolving regulatory and investor expectations increase the risks associated with inefficient energy use. Improving energy efficiency and accelerating the transition to renewable energy can help reduce emissions, strengthen operational resilience and manage longer-term energy and climate-related risks, while supporting a more sustainable business model.

Circular economy and waste management

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 with suppliers to encourage greater use of recyclable and recycled content, and responsible management of waste.

WORKFORCE CAPABILITY AND COMMUNITIES

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 and retention. 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. This includes supporting employees with AI training and other relevant upskilling to maintain a future-ready workforce.

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 policies and initiatives to support physical and mental health, as well as meaningful engagement and feedback mechanisms for all employees.

SUSTAINABILITY STRATEGY

The CKHGT Sustainability Strategy was refreshed in 2025 and approved by the CKHGT Policy Board in March 2026. It aligns with the overarching CKHH Sustainability Framework and addresses material topics for CKHGT as identified through the double materiality analysis. It sets 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 CKHGT sustainability report is structured according to the new Sustainability Strategy.

The world that is rapidly changing, particularly with respect to the geopolitical and macroeconomic environment, the use of digital technologies in society, and the opportunities and risks to which businesses must adapt.

At the same time, sustainability remains a core priority across the globe, with critical issues such as climate change, resource consumption, and inequality, still requiring focused action from business, and business resilience remaining paramount.

This new CKHGT Sustainability Strategy builds on the substantial achievements and progress already made by CKHGT's business units in areas such as climate action, circular business models, leading workplaces, and robust governance and management systems.

Priorities going forward also emphasise aspects that have emerged or evolved since the last strategy - such as new sustainability regulations and standards, growth in the use and potential of AI to address societal challenges, and the ever-rising threats from cyber security.

In moving forward on these strategic sustainability priorities, this will continue to support business resilience, compliance, reputation, cost savings, and value creation over time.

FIGURE 7: CKHGT SUSTAINABILITY STRATEGY

VISION: BUILDING A RESILIENT BUSINESS AND SUSTAINABLE DIGITAL SOCIETY

RESPONSIBLE AND RESILIENT BUSINESS

1. Implement strong governance and internal controls
2. Ensure secure, resilient systems and responsible AI
3. Manage supply chains responsibly

DIGITAL SOLUTIONS AND IMPACT

4. Enable impact through connectivity, digital solutions and AI
5. Support the digital safety of customers and communities
6. Enable digital inclusion and access

ENVIRONMENTAL TRANSITION AND RESILIENCE

7. Deliver the climate transition through our operations and value chain
8. Maintain a climate resilient business
9. Enable circularity of devices and networks

WORKFORCE CAPABILITY AND COMMUNITIES

10. Attract and retain an engaged and diverse workforce
11. Maintain a skilled and future-ready workforce
12. Use our capabilities to support communities in need

SUSTAINABILITY GOVERNANCE AND REPORTING

13. Implement best practice sustainability governance practices
14. Prepare for regulatory change on sustainability reporting
15. Ensure best practice sustainability due diligence across operations and supply chain

MATERIAL TOPICS

- Cyber security
- Responsible AI
- Supply chain responsibility
- Data privacy
- Business continuity and resilience

- Product and service impact
- Digital responsibility
- Customer responsibility

- Climate change mitigation
- Climate change adaptation
- Energy management
- Circular economy and waste management

- Inclusion and diversity
- Learning and development
- Employee satisfaction and wellbeing

RESPONSIBLE AND RESILIENT BUSINESS

As a wholly owned subsidiary of CKHH, CKHGT is integrated into the overarching governance and control framework of the CKHH Group. As such, it aligns with its parent company in embedding a best practice risk management and internal control framework, and acting with responsibility and integrity in the way it manages its operations and its value chain. This includes its arrangements to ensure ethical business conduct, to protect the privacy of customer data, to develop and use AI responsibly, to maintain the highest level of cyber security standards, to manage environmental impacts and to source responsibly.

ESG ratings and recognition for CKHGT and its business units

- In 2025, CKHGT was reassessed by Sustainalytics, maintaining a 'low risk' ESG rating for the second year. It was included in the Sustainalytics' Top-Rated ESG Companies List and awarded ESG Top-Rated badges for its industry and region.

- CKHGT submitted to the CDP[4] for the sixth consecutive year, improving its climate change score from 'B' in 2024, to 'A-' in 2025, and maintaining its water score of B-.

- CKHGT was awarded a Silver Medal in its first assessment by EcoVadis, one of the largest platforms in the world for evaluating corporate sustainability, ranking in the top 7% percent of all companies assessed in the prior year.

  For further details and context on this recognition please see: https://recognition.ecovadis.com/JM9Quhy16E-53Mb-2s9-cg.

- Wind Tre maintained its ESG rating with EcoVadis and confirmed its place in the top 1% of companies in the telecommunications sector globally.

- Wind Tre was recognised among the 2025-26 'Sustainability Champions' by the German Institute of Quality and Finance (ITQF).

- HTHKH was awarded the 2025 ESG Grand Award for the third consecutive year, in the ESG Awards 2025 organised by Master-Insight.com and The Research Centre for ESG at Hang Seng University of Hong Kong.

- HTHKH maintained the Award of Excellence in ESG (Others and GEM Companies category) for the fifth consecutive year in the Hong Kong Corporate Governance and ESG Excellence Awards 2025, organised by The Chamber of Hong Kong Listed Companies and the Centre for Corporate Governance and Financial Policy of the Hong Kong Baptist University.

- HTHKH received the ESG Special Recognition Award – TVB ESG Awards 2025.

[4] CDP is the world's largest environmental disclosure system, having run for over 25 years and representing a quarter of all global institutional financial assets.

ENTERPRISE RISK MANAGEMENT

CKHGT, as a member of CKHH, applies the Group's Enterprise Risk Management framework, which facilitates the identification, assessment and monitoring of risks through a structured 'top-down and bottom-up' approach.

On a half-yearly basis, as part of CKHH's Enterprise Risk Management framework, all business units, including CKHGT, 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, is recorded in a risk register to facilitate the ongoing review and tracking of progress.

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 to ensure effective risk management is in place.

While climate risks have been included within CKHH risk categories and business unit risk registers now for many years, in 2025, the integration of sustainability and climate change risks into the Enterprise Risk Management framework was further strengthened through the issuance of formal guidance to business unit risk teams, requiring assessment of material sustainability-related risks and opportunities as part of standard risk management process. This enhancement aims to ensure that sustainability and climate-related risks are assessed and managed in a coordinated and holistic manner, strengthening the Group's ability to respond to emerging challenges and enhance long-term resilience.

DATA PRIVACY

CKHGT has a duty to protect the personal data of every customer, employee, and business partner who entrusts the organisation with their private information. Over the past year, CKHGT has continued to strengthen its privacy governance, keeping pace with a rapidly evolving regulatory environment while ensuring that personal data is handled with integrity and care.

The European Commission has acknowledged the recent, rapid increase in European regulatory activity in the digital sphere, and the duplication and friction which has emerged —particularly through multiple reporting requirements, overlapping concepts, and parallel compliance processes.

In 2025, the Commission introduced the Digital Omnibus draft, aiming to simplify digital legislation and boost competitiveness within the EU. The proposal seeks to reduce duplicative obligations, clarify key concepts, ease compliance burdens for SMEs, and enable more practical implementation of AI and data rules—without altering the underlying rights of data subjects.

The progress of the Digital Omnibus will be closely monitored by regulatory and legal teams, with opportunities to reduce compliance burdens identified as the initiative develops.

Full enforcement of the EU AI Act is expected to begin in August 2026. In preparation, AI governance has been embedded into new product development to ensure compliance with data protection legislation across all enterprise initiatives involving AI technologies.

Data privacy governance and policy

CKHGT operates according to the CKHGT Personal Data Governance Policy, which is aligned 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 European business unit has a designated Data Protection Officer (DPO) to oversee data privacy compliance and practice, accountable to the local CEO, while HTHKH has a dedicated Data Protection Committee. 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.

3 Ireland additionally has a Privacy Champions Network embedded across departments and projects, acting as local privacy advocates and supporting risk assessments. Members promote privacy awareness and serve as the first point of contact for privacy-related queries within their teams, reinforcing compliance practices and ensuring adherence to policies. They also help monitor compliance at a local level by reporting potential issues or breaches to the DPO office and supporting the implementation of corrective measures within their departments.

Regular training and awareness

CKHGT maintains a multi-channel approach to privacy awareness and training, designed to promote a strong culture of data protection across all markets.

Regular awareness communications are delivered through a combination of newsletters, intranet portals, and targeted updates at business unit level. Employees receive periodic privacy and compliance newsletters featuring regulatory updates, practical guidance, and case studies. Intranet platforms provide continuous access to policies, procedures, FAQs, and training materials, ensuring that employees can easily reference up-to-date information.

Additional awareness initiatives include recurring meetings with compliance ambassadors and privacy officers, workshops on emerging topics, and targeted communications to specific functions based on risk exposure (e.g. customer service, data science, and IT teams).

Mandatory training is provided by business units to all employees at least annually. Core training typically covers fundamental data protection principles, data subject rights, secure data handling practices, and breach reporting procedures. Training is commonly delivered through a dedicated e-learning module, often alongside regular cyber security training, and is updated as necessary by DPOs where relevant.

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. This structured and adaptive approach ensures that employees remain informed and equipped to manage personal data responsibly in their day-to-day activities.

DATA PRIVACY TRAINING AND AWARENESS

3 Denmark demonstrates an embedded approach to privacy awareness through frequent, informal engagement channels. In addition to a monthly compliance newsletter, employees can access daily privacy advice from a Data Privacy and AI specialist on request. This is reinforced by quarterly meetings with compliance ambassadors, ad hoc training tailored to specific stakeholder needs, and ongoing dialogue via internal collaboration tools. This continuous, accessible model helps integrate privacy into everyday decision-making rather than relying solely on periodic training.

3 Ireland shares regular privacy awareness communications to employees through newsletters, targeted emails addressing specific risks of new policies, and an accessible intranet privacy portal. These communications are designed to keep privacy top-of-mind and provide practical, role-specific guidance. In 2025, **3** Ireland further evolved its privacy awareness programme by integrating AI-specific guidance and risk considerations into both training and communications. Building on its established risk-based model, employees now receive more targeted updates linked to emerging regulations (e.g. AI-related requirements) and practical use cases such as bias mitigation and responsible data use in AI systems. This ensures that privacy training remains forward-looking and aligned with rapidly developing technology and regulatory landscapes.

In 2025, Wind Tre launched a new online privacy training course, mandatory for all company employees. The course provides an update on current regulatory expectations and internal company policies, strengthening employee understanding of roles and responsibilities. In parallel, 2025 communications placed increased emphasis on evolving areas such as cyber security, video surveillance, and enhanced internal governance requirements. Moreover, training continues to be extended to agent partners, agencies, suppliers and dealers on privacy issues and security measures.

Privacy risk assessments and audits

CKHGT operates a structured and risk-based framework at business unit level for conducting privacy risk assessments and audits across its operations. Privacy Impact Assessments (PIAs), or equivalent evaluations, are carried out for all new projects, systems, and processing activities involving personal data to identify potential risks to individuals' rights and freedoms. Where a high risk is identified, a Data Protection Impact Assessment (DPIA) is performed in accordance with regulatory requirements. These assessments are reviewed and updated whenever there are significant changes to processing activities, and periodically where required.

In addition to general assessments, targeted evaluations – such as those related to international data transfers and specific legal bases for processing – are conducted to address particular risk areas and ensure compliance with applicable regulations. 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 DPOs to ensure that data protection principles are adhered to.

AI SPECIFIC DATA PROTECTION IMPACT ASSESSMENTS AT 3 IRELAND

At **3** Ireland, AI specific DPIAs have been introduced to strengthen governance over the use of AI and to prepare for the requirements of the EU AI Act. Building on existing EU General Data Protection Regulation (GDPR) DPIA processes, the enhanced approach addresses additional AI-related risks, including bias and discrimination, transparency and explainability, system robustness, and potential impacts on fundamental rights.

A dedicated AI specific DPIA framework has been developed and applied to AI systems lifecycle, from design and development through to deployment. Its implementation is supported by cross-functional collaboration between legal, compliance, technology and business teams.

These measures support earlier identification and mitigation of AI-related risks, strengthen regulatory readiness, and enhance transparency and accountability. Targeted training and awareness sessions further promote responsible AI use, helping to build trust with customers, employees and regulators while supporting continued innovation.

Privacy audits form a key component of each business unit's oversight framework. These audits are conducted on a regular basis, with higher-risk systems and processes reviewed more frequently. Audit activities typically include an evaluation of data processing practices, governance controls, and compliance with internal policies and external legal requirements.

Internal audits are conducted on an ongoing basis, including by Group Management Services (GMS), CKHGT's internal audit function, and local DPOs. In 2025, GMS reported on the findings of internal audits including aspects of data privacy for **3** Ireland's franchise operations, **3** Austria's credit control and customer fraud management processes, including customer data governance, and Wind Tre Very Mobile's commercial operations including the related data privacy practices and system access controls. DPOs provide local independent oversight of assessments and audits, reviewing outcomes, supporting investigations where necessary, and ensuring that appropriate corrective actions are implemented. Progress against identified actions is tracked and reported to relevant stakeholders to ensure accountability and continuous improvement.

Suppliers and partners that control or process personal data on behalf of business units are subject to periodic privacy assessments, which may include questionnaires, audits, and reviews conducted during onboarding and contractual engagements. For example, Wind Tre carried out 81 such assessments during 2025.

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.

Through these processes, CKHGT maintains a proactive approach at business unit level to identifying and mitigating privacy risks, strengthening its overall data protection framework and safeguarding personal data across its operations.

Privacy notices and external data privacy policies

Across CKHGT, business units' notices are a key mechanism for ensuring transparency around how personal data is collected, used, shared and retained.

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. For example, during 2025, Wind Tre updated its Privacy Notice and sent a communication to customers, informing them of the updated version and changes made.

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.

All European business units ensure that consent for the processing, sharing, or retention of confidential or personal information is obtained and managed in a transparent, informed, and lawful manner, in line with the EU GDPR. In HTHKH, stakeholder consent is obtained through clearly defined procedures aligned with the Personal Data Privacy Ordinance (Cap. 486, Laws of Hong Kong) ("PDPO"). Prior to the collection or processing of customer personal data, stakeholders are informed of the purpose, scope, and retention period through formal channels such as consent forms, privacy policy and personal information collection statement, service terms and conditions, or contractual agreements.

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 have formal processes to identify, assess and respond to personal data breaches in line with applicable data protection laws, including the EU GDPR and relevant national regulations. Employees and third parties are required to report any suspected or confirmed privacy breach promptly, enabling timely assessment and containment of incidents.

When a potential breach is identified, it is assessed to determine whether it constitutes a personal data breach and whether notification obligations apply. 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.

Breach reporting requirements are included within data privacy training provided to employees. For example, in **3** Ireland, the mandatory data protection and security training provided to all employees at induction and annually thereafter, includes breach identification and escalation procedures. Targeted sessions are provided for customer-facing teams to reinforce correct breach escalation practices.

DATA BREACH REPORTING AND MANAGEMENT AT 3 IRELAND

The formal data breach reporting framework in place at **3** Ireland ensures that actual or suspected personal data breaches are identified, assessed and managed in line with the EU GDPR, Ireland's Data Protection Act 2018 and applicable ePrivacy regulations. All employees, contractors and relevant third-parties are required to report suspected incidents promptly, supporting early containment and timely assessment of risks to individuals' rights and freedoms.

Reported incidents are assessed to determine whether notification obligations apply. Where a breach is likely to result in a risk to individuals, notification is made to the Irish Data Protection Commission within the statutory timeframe, and affected individuals are informed without undue delay where required. All incidents are documented to demonstrate accountability, and post-incident reviews are carried out to identify corrective actions and strengthen controls, supporting continuous improvement in data protection practices.

Requirements on third-parties

CKHGT business units apply clear requirements to third parties that process personal data on their behalf, including suppliers, agents, partners and service providers. These requirements are designed to ensure that personal data is handled securely, lawfully and in line with applicable data protection legislation, including the GDPR and relevant national laws.

Third-parties are engaged under contractual arrangements that include data protection and information security obligations, for example defining the scope and purpose of data processing, requiring the implementation of appropriate technical and organisational security measures, and restricting the use of personal data to agreed purposes only. Where new suppliers or services are introduced, additional security and privacy requirements are assessed and documented as part of the onboarding process.

Where third-party processing involves cross-border data transfers, additional safeguards are applied to ensure compliance with applicable data protection laws. These include the assessment of transfer-related risks as part of privacy impact assessments and supplier due diligence processes, as well as the use of contractual controls to ensure appropriate protection of personal data. This approach supports lawful and secure international data transfers and strengthens oversight of third-party data processing arrangements.

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.

WIND TRE REQUIREMENTS ON THIRD-PARTIES

Wind Tre applies structured requirements to third-parties involved in activities that process personal data, including agents, retailers, telesellers and service providers, ensuring that personal data is processed securely, transparently and in compliance with applicable data protection laws.

To strengthen oversight of third-party activities, Wind Tre conducts regular privacy and security assessments of suppliers acting as data processors. Contracts with third parties include specific data protection and information security clauses, supporting consistent standards across the supply chain and reducing risks associated with indirect data processing activities.

A key element of Wind Tre's third-party governance is the implementation of the 'From Contact to Contract' system, which establishes a chain of automated controls, allowing the recording, tracking and reconstruction of the full consent-contact-contract journey, including interactions initiated through third parties. By enabling end-to-end visibility across the data processing chain, the system strengthens internal controls and enhances accountability in third-party-related data processing.

RESPONSIBLE USE OF AI

CKHGT recognises the transformative potential of AI technologies, which offer substantial opportunities to improve efficiency, productivity, innovation and customer experience. At the same time, CKHGT is committed to ensuring that AI is used responsibly, ethically and in line with applicable laws, including emerging AI-specific regulation. Its approach is guided by CKHH policy, local governance frameworks and a strong focus on employee awareness and accountability. In the EU, the regulatory landscape for AI is evolving rapidly. The EU's AI Act introduces a harmonised, risk-based framework to ensure AI systems are safe, trustworthy, and respect fundamental rights. It classifies systems by risk level, prohibiting certain uses and imposing stricter requirements on high-risk AI. These include obligations on risk management, data governance, transparency, human oversight, and cyber security, alongside clear accountability across the AI value chain, including for users of third-party solutions.

Additionally, 'soft law' instruments across various markets contribute to a broad AI governance ecosystem that regulatory and product teams must consider, including sector-specific guidelines, ethical frameworks, industry standards, and best practices.

AI governance and policies

CKHGT activities are governed by the CKHH Policy on Reasonable and Ethical Procurement, Implementation and Use of AI. This policy articulates clear principles and protocols for AI system usage – whether internal, external or commercial – ensuring alignment with CKHH's core principles, corporate disciplines and regulatory obligations. Additionally, business units have local level responsible AI policies and procedures which set clear expectations for how AI systems may be used and commissioned, whether developed internally or provided by third parties. They are designed to ensure that AI applications are lawful, fair, and secure while supporting innovation and value creation.

All European business units have set up AI Committees that are responsible for reviewing AI use cases, approving new systems, and monitoring compliance with regulatory and ethical requirements. These structures support alignment with emerging legislation such as the EU AI Act, including the identification and management of higher-risk AI systems.

RESPONSIBLE AI IN WIND TRE

Wind Tre has an AI Governance Committee, providing end-to-end oversight of the responsible use of AI across the business. Ahead of the publication of the EU AI Act, Wind Tre had started implementing internal monitoring mechanisms to oversee the development, adoption, and use of AI systems. In July 2025, Wind Tre introduced a new procedure dedicated to AI, aimed at leveraging the opportunities offered by AI in a safe, responsible, and transparent manner. The procedure requires that every new AI system be assessed by three corporate bodies: the Data and Automation Adoption Unit (DAU) which gathers AI use cases and conducts an initial screening, the AI Technical Committee which provides preliminary technical and regulatory opinion, and the AI Governance Committee which assesses whether to grant authorisation and under which conditions.

The assessments take into account technical and regulatory aspects, following the risk levels established by the EU AI Act and the principles set out in Wind Tre's AI Policy. The procedure came into force in September 2025 and is monitored on a quarterly basis to evaluate its impact and introduce any necessary adjustments. The AI Governance Committee may also require additional controls beyond the controls set out in the procedure for all matters falling within the scope of AI.

Human oversight remains a core principle of CKHGT's AI approach. AI systems are designed to support, rather than replace human decision-making, with appropriate controls in place to allow for human intervention where needed. They are developed and deployed with transparency and interpretability, seeking to ensure that AI-driven outcomes can be understood, explained and challenged where appropriate.

RESPONSIBLE AI IN HTHKH

HTHKH leverages AI-related technologies to deliver innovative solutions and services while prioritising safety and security throughout implementation. HTHKH has established practices to ensure AI tools are deployed responsibly and in compliance with regulatory requirements, while safeguarding sensitive information. Regular audits are conducted to ensure all controls are applied appropriately. The AI-related policies of HTHKH are under review to ensure consistency with the HTHKH operating framework. They define robust principles and protocols for AI system usage spanning internal, external, and commercial contexts, reinforcing responsible adoption and adherence to CKHH's strategic priorities, governance standards, and regulatory obligations.

AI GOVERNANCE AND MANAGEMENT SYSTEMS AT 3 IRELAND

3 Ireland has implemented a centralised AI governance framework to support the responsible, secure and compliant use of AI. The framework builds on existing data protection, information security and risk management processes, integrating AI-specific requirements into core business workflows.

AI use is governed through a clear policy framework, including an AI Governance Policy, Responsible Use of AI Policy and Data Ethics guidance, supported by updates to related security, data governance and acceptable use policies. A cross-functional AI Steering Committee reviews AI use cases on a regular basis, supported by AI-specific DPIAs and risk reviews.

To improve accessibility and oversight, **3** Ireland has introduced a digitised AI governance process and launched an internal AI Hub, providing guidance, resources and learning materials to strengthen AI literacy across the organisation, while supporting innovation and compliance. This includes a bespoke, scenario-based AI General Awareness training.

AI training for employees

AI literacy is a key enabler of responsible use. Across CKHGT, employee awareness and capability on AI is being strengthened through structured AI training and workshops, helping employees understand both the opportunities and the risks associated with AI, including regulatory obligations, ethical considerations and practical applications of AI tools. Training approaches range from mandatory company-wide programmes and general AI literacy initiatives to specialised learning paths and advanced workshops, ensuring that employees at all levels are equipped to use AI safely, effectively, and in line with corporate values and regulatory expectations. More advanced training is also implemented in various markets and for certain roles.

During 2025, all European business units developed or enhanced dedicated, online AI awareness training for all employees. In 2025 **3** Ireland deployed the first phase of its AI literacy strategy, covering AI general awareness and literacy training for the whole organisation, and applied AI for certain roles. Further training will be rolled out as part of an AI Academy that is launching in 2026. **3** Sweden implemented mandatory training for employees and released an AI-Hub with tools and guides to assist with practical uses. **3** Denmark launched an enhanced version of its 'Responsible Use of AI' training module.

As outlined in the chapter 'Workforce capability and communities', Wind Tre launched seven e-learning programmes in 2025, with the goal of strengthening data-related skills, and embracing innovation as a strategic lever for the future.

Both **3** Denmark and **3** Sweden have established an 'AI Champions' programme, with more specialised training provided to individuals across departments, facilitating exploration of AI-related opportunities as well as a responsible approach to development and deployment.

HTHKH provides ongoing training and awareness programmes to strengthen employees' understanding of responsible AI use. These initiatives ensure that employees handle sensitive information appropriately and in accordance with HTHKH's Information Classification Scheme, as well as relevant laws and regulations.

EMPLOYEE INVOLVEMENT WITH AI AT 3 DENMARK

3 Denmark has established arrangements to actively involve its employees both in the use of AI as a strategic lever for business improvement, and in the development of responsible AI practices.

AI Taskforce

The AI Taskforce at **3** Denmark is an employee-driven initiative that promotes an informed and responsible approach to the development and use of AI across the organisation. Its role includes monitoring AI developments, supporting strategic and responsible use in practice, and providing a forum for dialogue on how AI can best create value for the business.

The taskforce brings together employees from across the organisation and meets on a bi-weekly basis to share experiences and identify new AI opportunities, with a focus on efficiency, ethical use and practical application.

Compliance ambassadors

3 Denmark has appointed internal compliance ambassadors to strengthen local awareness of compliance and data ethics, including in relation to AI. The ambassadors act as a link between business units and the Governance, Risk and Compliance (GRC) team, including the DPO.

Ambassadors receive targeted training on AI-related compliance and personal data processing. They provide guidance on responsible and compliant use of AI, communicate current guidelines and best practices within their departments, and support the early identification and management of potential compliance risks.

3 Denmark's AI Taskforce

CYBER SECURITY

Cyber security threats, including phishing, vishing and ransomware, continued to increase during the year. The growing use of emerging technologies, such as the integration of AI into cyber-attacks, further heightened the complexity of the threat landscape.

At the same time, the regulatory environment continued to evolve. Key developments included the EU Cyber Resilience Act (CRA), which came into force in December 2024, and the transposition and enforcement of the NIS2 Directive (EU) 2022/2555 across European markets. The CRA aims to strengthen the cyber security of products with digital elements placed on the EU market, while NIS2 broadens the scope of minimum cyber security risk-management requirements, including incident reporting, vulnerability management and supply-chain security controls.

Across CKHGT, and reflective of the focus being taken across the CKHH Group, there continued to be significant investment in platforms, systems, services, testing and training 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 CONTINUING TO ENHANCE CYBER SECURITY ARRANGEMENTS

In 2025, Wind Tre continued to strengthen its cyber security by improving governance, monitoring and resilience across its systems.

Key actions included improving security monitoring to detect and respond to threats more effectively, and ensuring the secure adoption of artificial intelligence through structured risk assessments, while the Security by Design approach was systematically embedded across digital development processes. Wind Tre also introduced a centralised firewall management tool to further strengthen and standardise network security.

In parallel, the company strengthened the governance of disaster recovery plans and carried out related testing to support service continuity.

Cyber security governance

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

The Cyber Security Working Group is chaired by the CKHH Group Co-Managing Director and Group Finance Director, who is also a CKHGT Board member and sits on the CKHGT Policy Board of business unit CEOs. CKHGT is represented on this working group by the CEO of CKH IOD as well as CKH IOD's Director of Global Technology and Market Intelligence (former Chair of the GSMA Fraud and Security Advisory Panel) and Director of Global Technology Solutions. The working group also includes representatives from GMS and Group Information Services Department, with business units invited to attend ad hoc to discuss specific topics.

A dedicated sub-working group focuses on operational technology and supports the development of consistent cyber security practices across mobile businesses. This group leverages shared expertise and promotes collaboration across CKHGT. CKH IOD provides specialist input to the sub-working group where required. For example, throughout 2025, it conducted benchmarking of tools and processes contributing to cyber-readiness across CKHGT, assigning scores and identifying areas for improvement.

The CKH IOD business also has responsibility for cyber security of several central functions across CKHGT. Technology and security directors have oversight of the CKH IOD cyber security operations team.

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 (CTO) or the business unit CEO. These business unit teams manage 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.

Business unit senior executives receive regular updates on cyber security risks from their local cyber security teams. These reports outline progress across key improvement initiatives, as well as summarising incidents, emerging threats, and other significant developments during the reporting period.

The cyber security defences of HTHKH are governed by a Security Committee led by the Vice President of Digital Innovations and IT Development. It includes technical specialists from the IT Department and experts from the Corporate Security and Fraud Management function. 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. Formal bodies are in place across European business units to oversee collaboration on information security standards and approval of related investments and architectural decisions.

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 ETSI. CKHGT also incorporates security technologies developed by the Internet Engineering Task Force (IETF) where appropriate – such as in 2025, the implementation of further secure messaging protocols for mobile devices. Business units also monitor the latest cyber security threats through industry fora and bulletins at a local level to maintain awareness of the latest and emerging risks.

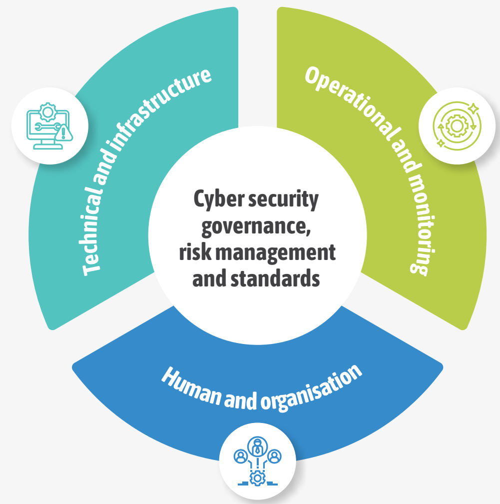
All cyber security management is conducted within the framework of the CKHH Information Security Policy.

Cyber security risk management frameworks and standards

In 2025, **3** Ireland achieved the ISO 27001: Information Security Management System (ISMS) certification over its IoT management platform and IoT connectivity managed by the platform. Together with Wind Tre and **3** Austria's renewed certifications, business units with ISO 27001 certification over some or all operations now represent over 75% of CKHGT operations. During 2025, **3** Sweden and **3** Denmark also initiated an ISO 27001 certification project for their switch solution ('3Kontakt' in Denmark and '3Koppla' in Sweden), a cloud-based business communication and call-management solution for business customers, which involved establishing new company-wide processes and procedures for information security. Other 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.

FIGURE 8: CYBER SECURITY RISK MANAGEMENT AT CKHGT



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

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

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

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.

All ISO 27001 certification and renewal activities as outlined in the section *Cyber security risk management frameworks and standards* involve external audit and assessment.

Throughout 2025, 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.

Cyber security also forms part of CKHH's internal audit programme, with IT security controls of certain business units subject to internal audit during the year.

Strengthening cyber security resilience

During 2025, all business units continued to strengthen their cyber security resilience through improved monitoring, controls and operational capabilities. Several markets established local Security Operations Centres (SOCs) – important for providing continuous, real-time monitoring and response, using advanced analytics and automation to identify and respond to cyber threats.

CKHGT European business units improved their cyber security arrangements by improving operational capabilities and tightening controls over access to critical systems and introducing a new tool to better manage privileged user access, further strengthening the protection of customer information. Businesses carry out annual security reviews across key areas, supported by ongoing checks for system vulnerabilities. The rollout of a new customer management system will further strengthen the protection of customer information.

They have invested in the security of their digital infrastructure by strengthening protections around internet-facing systems, upgrading firewall technologies, and introducing new tools to help prevent the loss of sensitive information.

Business units have also strengthened cyber resilience by upgrading core security controls and reducing exposure to higher-risk legacy systems through decommissioning or modernisation. Key initiatives included the deployment of Endpoint Detection and Response (EDR), introducing secure offline backups for critical systems, and the rollout of a Cyber Threat Intelligence platform to help identify emerging risks. These were supported by improvements to vulnerability management, incident response and third-party risk management.

Further improvements are planned to expand monitoring coverage and strengthen security controls across critical systems.

CYBER SECURITY ENHANCED WITH AN AI-DRIVEN SECURITY OPERATIONS CENTRE

HTHKH launched an advanced SOC in collaboration with the CKHH Group Cyber Security and Group Information Services Department. This strategic initiative is designed to monitor, detect, and respond to cyber threats in real-time, ensuring robust protection for customer data and business systems.

The SOC integrates cutting-edge AI-based security technologies provided by Microsoft and the CKHH Group Cyber Security unit. These tools enable proactive threat detection and rapid incident response, leveraging Cyber Threat Intelligence (CTI) and industry-leading security baseline policies to defend against emerging risks. By combining automation with expert oversight, the SOC delivers a highly resilient security framework that sets new standards in the telecommunications sector.

This initiative also benefits from HTHKH's strong security infrastructure. The collaboration demonstrates a shared commitment to excellence in cyber security, ensuring that customer information remains secure while supporting a safer digital future.

Managing third-party cyber security risk

CKHGT operations depend on a wide network of technology suppliers and service providers, making the management of third-party cyber security risk critical to system resilience and service continuity. CKHGT focuses on identifying, assessing and managing cyber risks introduced through external relationships, with controls designed to prevent disruption, protect critical infrastructure and support rapid response to emerging threats.

Third-party cyber security risk management is embedded into technology sourcing, onboarding and operational processes. Suppliers with access to networks, systems or critical services are subject to cyber security assessments that consider security controls, infrastructure resilience and the ability to detect, respond to and recover from cyber incidents. The intensity of assessment and oversight is risk-based, reflecting the supplier's role, system connectivity and potential impact on operations.

Cyber security expectations are reinforced through contractual arrangements and operational engagement, including defined security standards, incident escalation requirements and rights of assurance.

Several business units operate structured third-party risk management frameworks supported by standardised questionnaires, supplier risk assessments and contractual security requirements. For example, **3** Ireland assesses and continuously monitors the cyber security position of suppliers with system or network access, supported by automated monitoring tools and periodic reassessments. Enhancements are also underway to further align due diligence with supplier risk profiles, including access levels and business criticality.

At HTHKH, third-party cyber security risk assessments are carried out for projects and products, covering areas such as information security controls, infrastructure security and physical security where relevant.

CKHGT European business units apply internal risk assessments and information security appendices within contracts to support consistent security expectations across the supply chain.

Third-party cyber security risk management is supported by systematic security checklists, continuous threat-intelligence monitoring and annual supplier qualification processes. These measures support operational resilience and coordinated response across the supply chain.

Employee training and awareness on cyber security

People factors are critical to effective cyber security. Research shows that an individual's understanding of cyber threats varies based on factors such as education, age, training, and job role. Recognising this, CKHGT invests in continuous cyber security training to raise awareness and foster a strong cyber security culture.

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.

CYBER SECURITY TRAINING AND AWARENESS ACROSS CKHGT

3 Sweden and 3 Denmark

In **3** Denmark and **3** Sweden, phishing simulations showed improved awareness, with training and awareness activities further intensified to continue such improvement. **3** Sweden introduced bi-weekly awareness training ('nano-learning') for all employees in addition to its annual online training, classroom training, employee phishing simulations and digital phishing-awareness courses. **3** Denmark continued its awareness programme for all employees, covering privacy, information security, AI and IT security.

HTHKH

HTHKH rolled out its online cyber security awareness training for all employees. Regular corporate-wide email phishing exercises are also conducted to test awareness of fraudulent and phishing content.

3 Ireland

3 Ireland assigns a mandatory cyber security awareness module to all employees at onboarding and annually thereafter. Role-specific training is also provided to relevant user groups, such as Secure Development and Coding for developers. Employees are tested on a quarterly basis through simulated phishing campaigns, with a mandatory phishing training module assigned to employees that fail during the phishing campaign.

In addition, **3** Ireland maintains a structured security awareness schedule, under which cyber security topics are communicated regularly to all employees via a weekly internal newsletter. This is supported by an Information Security Hub accessible to all employees, which provides guidance, practical tips and self-service resources to help employees stay secure in their day-to-day activities.

Wind Tre

In 2025, Wind Tre strengthened its cyber resilience through a company-wide training and awareness programme, recognising employees as a critical line of defence. Initiatives included expert-led webinars, internal communication campaigns, targeted training for retail teams, and ongoing phishing simulations to reinforce awareness and vigilance.

Cyber security culture was further supported through initiatives such as SecurityLab, the company's first internal information security faculty for employees involved in technology and service management, alongside a comic-style booklet promoting practical best practices for managing cyber risks.

Responding to data breaches and cyber-attacks

CKHGT business units have established processes and controls to detect, respond to and recover from data breaches and cyber-attacks. These include EDR tools, data backup and recovery strategies, and incident response plans tailored to local operations. The Group continues to invest in tools and services that strengthen cyber-attack detection and enable rapid and effective response.

Business units have dedicated teams or nominated individuals responsible for managing cyber incidents, supported by local procedures for crisis and critical incident response. Incident response actions are proportionate to the severity of the incident. Where a data security incident involves personal data, immediate steps are taken to contain the incident, mitigate potential impacts and prevent further unauthorised access, use or damage as outlined in the section 'Data privacy'.

Relevant internal functions, including Legal and Regulatory Affairs, Corporate Security and, where applicable, Corporate Affairs teams, are notified promptly. Regulatory authorities and affected individuals are informed where required by law. Following an initial assessment, response actions proceed in line with established business continuity and disaster recovery plans, supported by backup, failover and data restoration processes. Testing of recovery and restore capabilities is carried out regularly, including in connection with system changes, and incident handling guidance is reviewed and updated periodically.

During 2025, business units further strengthened their cyber incident response arrangements. For example, endpoint protection was modernised through the rollout of EDR, alongside enhanced recovery readiness supported by a secure 'cyber vault' operating model designed to protect and restore critical systems and data.

Business units maintain an information security incident response plan that defines roles and responsibilities, communication processes, and the tools used to identify, contain and recover compromised data. Incident details, including any actual or potential data compromise and remediation actions, are reported to relevant internal (and necessary external) stakeholders, including Legal and Regulatory Affairs, information owners, information security custodians and affected departments. For major incidents, a senior-executive-Crisis Management Team comprised of senior leaders, coordinates strategic and tactical responses, supported by annual crisis drills to test preparedness and enable effective decision-making.

Wind Tre operates a structured and robust cyber security incident management framework, supported by multiple specialised units and clear segregation of duties. This includes a structured Security Event and Incident Management Process, supported by its Cyber Intelligence and Defence unit, responsible for detecting, analysing, containing and resolving cyber incidents, restoring normal operations and driving continuous improvement through lessons learned. Detailed playbooks support the management of different cyber incident scenarios, and information security incidents are reported to the relevant Italian authorities and disclosed annually in Wind Tre's sustainability reporting.

During the year, CKHGT business units in the EU strengthened their monitoring and detection capabilities, supported by local procedures that allow for the engagement of external specialists and intelligence sharing. Further enhancements are planned to improve analytical capabilities, escalation routines and overall operational readiness, supporting faster and more coordinated responses to emerging cyber risks.

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 EDR, security rating services, and external attack surface management.

During 2025, CKHGT continued its long-term preparations for a transition to 'quantum-resistant' cryptography, such that systems and customers can continue to be protected in a 'post-quantum' world. Progress is monitored and reviewed at the CKHH Cyber Security Working Group level, and in business unit workshops.

In 2026, CKHGT will continue to prepare for new and updated regulatory instruments, including the EU implementation of the CRA and the revision of the Cybersecurity Act, which will impose further obligations on cyber security scope, testing, incident response, certification of supply chains, removal of high-risk vendors, and other requirements. CKHGT is also launching a Network Security Programme to assess the maturity of network security in each business unit, enabling measurement, benchmarking and internal reporting.

ETHICAL OPERATIONS

CKHGT, in line with its parent CKHH, upholds business ethics and operational integrity through a comprehensive internal control framework encompassing governance policies, structured communication and training programmes, continuous assessments, rigorous due diligence processes, monitoring and review.

The CKHH Group's governance policies are accessible through an internal portal and on the corporate website. These policies are approved by the CKHH Board and are reviewed and updated as necessary to ensure continued relevance and effectiveness. To address specific local requirements, individual business units adopt supplementary policies that align with the Group's overarching governance framework. Annual compliance training delivered by business units includes aspects of conduct and other governance policy.

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 the CKHH Group 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 the CKHH Group.

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's internal control framework includes a strong focus on monitoring and enforcing compliance with policies, procedures and guidelines. Business units are periodically internally audited on business ethics issues including anti-corruption and bribery practices, procurement, gifts and hospitality, donations and sponsorships, and more. In 2025, GMS performed internal audits on **3** Ireland's anti-fraud and anti-bribery (AFAB) framework and related regulatory requirements, as well as on fraud reporting and management and whistleblowing. GMS also audited Wind Tre's procurement operations and related supplier management and AFAB controls. **3** Denmark was audited by a minority owner on anti-corruption and bribery, including annual training, risk management and controls and monitoring procedures.

Business units also take steps to ensure that business partners operate responsibly. At **3** Ireland, corruption risks within the supply chain are identified and managed through mandatory due diligence checks on all suppliers prior to onboarding, supported by external screening tools provided by Refinitiv and Experian. HTHKH applies a comprehensive Business Partner Evaluation process to identify and assess suppliers with elevated corruption risk. Similar supplier due diligence and corruption risk assessments are carried out at **3** Denmark and **3** Sweden.

Across all operating countries, employees receive mandatory annual training on ethics, compliance, anti-corruption and responsible business conduct. Training content is adapted to reflect local regulatory requirements and risk profiles and may include additional focus areas such as competition law, sustainability and whistleblowing.

In **3** Ireland, all employees complete annual mandatory training on financial crime, anti-bribery and corruption. **3** Sweden maintains a strict anti-fraud and anti-corruption policy, supported by annual employee training, while **3** Austria delivers mandatory annual compliance training to all employees.

In Wind Tre, all personnel complete annual e-learning on anti-corruption policies and procedures, the Code of Conduct, whistleblowing procedures, and the organisational and control model adopted under Italian Legislative Decree 231/2001[5], with tailored in-person training provided to senior executives. Training needs are reviewed annually by the Compliance function, taking into account the outcomes of audits of processes exposed to corruption and other risks under Legislative Decree 231. In 2025, Wind Tre also prepared for the ISO 37001 certification on Anti-Bribery Management Systems to strengthen ethical and responsible decision-making processes, prevent unlawful conduct related to bribery and corruption, and continuously improve their internal control system[6].

There were no concluded legal cases regarding corrupt practices brought against the CKHGT or its employees that had a significant impact on CKHGT in the reporting period.

[5] Italian Legislative Decree 231/2001 establishes corporate liability for certain criminal offences, including corruption, and promotes the adoption of organisational and control models to prevent misconduct.
[6] Wind Tre received the ISO 370001 accreditation in March 2026.

ENSURING ETHICAL PRACTICES WITH THE CODE OF ETHICS AT HTHKH

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. HTHKH enforces a zero-tolerance policy towards all forms of bribery. The Anti-Fraud and Anti-Bribery Policy covers any improper payments, 'kickbacks' or other bribery-related activities, explicitly prohibiting employees from using HTHKH funds or assets for political or charitable contributions and sponsorships. 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 representatives from the Human Resources, Legal and Regulatory Affairs, and Corporate Security teams, to determine appropriate actions. Non-compliance with the Code of Ethics may result in disciplinary actions, and any violations will be reported to regulatory authorities as deemed necessary.

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. Due diligence procedures were carried out on 388 business partners in 2025.

Wind Tre has also established a Donations, Sponsorships and Membership Fees Procedure and a Gifts and Hospitality Procedure, which set out how these initiatives should be managed. In 2025, in-depth preliminary analyses were conducted on all donations, sponsorships and membership fees paid during the year.

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

Respecting competition laws

The CKHH Code of Conduct ('the Code'), which applies to CKHGT as a wholly owned subsidiary, sets out the requirement that all employees must conduct themselves in compliance with all applicable laws, rules and regulations, including competition laws, wherever CKHH and its subsidiaries conduct business. The Code requires a number of principles to be upheld including fair dealing and integrity, avoidance of conflicts of interest, and compliance with regulatory requirements in all jurisdictions. Compliance with this Code is enforceable through internal reporting of violations, and non-compliance exposes employees to disciplinary action including termination of employment, as well as civil and criminal penalties, including fines and/or imprisonment in cases of violation of the law.

CKHGT participates in industry associations and collaborative initiatives, such as the GSMA, to support the development of interoperable standards, policy dialogue and industry wide solutions that deliver benefits for consumers and society. When engaging in these activities, CKHGT expects its representatives to act in strict accordance with applicable competition and anti trust laws and with the anti-trust policies and codes of conduct established by the relevant associations. In the case of the GSMA, this includes adherence to clearly defined anti-trust principles governing cooperation between members, enabling CKHGT to contribute constructively to industry collaboration while safeguarding fair competition and market integrity.

Business units ensure that their employees are appropriately trained on anti-trust and anti-competition. For example, Wind Tre's 'Anti-trust Compliance Programme' provides specific training to prevent anti-competitive actions across the company and ensure proper execution of all activities and projects. **3** Denmark has mandatory courses for all employees, including on competition law, which must be completed at least once a year. In **3** Ireland, all employees receive mandatory competition law compliance training on an annual basis. **3** Sweden's employees also receive mandatory training which includes anti-trust.

Responsible employment practices

The CKHH Human Rights Policy and aligned CKHGT Human Rights Policy, form a key foundation of CKHGT employment practices, ensuring full compliance with labour laws and regulations across all jurisdictions and business units. Transparent communication channels are maintained to keep employees informed about policies, rights, and workplace practices.

In line with CKHH, CKHGT also upholds freedom of association, allowing employees to join or form labour unions without fear of reprisal. Collective bargaining agreements reflecting this commitment, cover 75% of CKHGT employees in 2025. Collective bargaining agreements cover topics such as employee health and safety, working conditions, career management and training, and discrimination and harassment. Regular dialogue with union representatives ensures employee interests are taken into account in decision-making processes.

Beyond statutory obligations, CKHGT businesses offer a range of non-statutory benefits and have a focus on supporting employee health and wellbeing. Further detail on these topics is included in the 'Talent Attraction and Retention' section of this report.

Whistleblowing

CKHGT operates in accordance with the CKHH Whistleblowing Policy and associated reporting arrangements. As such, business units maintain systems for employees and external stakeholders including customers, suppliers, creditors, and debtors to report, in confidence, any suspected improprieties, misconducts, or malpractices. These systems operate in local languages via corporate websites or dedicated portals.

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

Reports of material incidents are required to be escalated to the CKHH Group Co-Managing Director and 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 Ireland's Protected Disclosures Act, **3** Ireland encourages reporting by any person, of concerns related to impropriety or malpractice via its Protected Disclosures Portal, ensuring confidentiality of submission and protection from reprisal. Wind Tre, compliant with Italian Legislative Decree No. 24/2023, has 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 and has developed a 'Speak Up Buddy' concept, to foster a culture where everyone feel safe and supported to speak up, encouraging disclosure. **3** Denmark allows concerns to be reported confidentially through a secure online reporting platform which enables individuals to submit written reports confidentially.

3 Austria promotes integrity and transparency through its web-based whistleblower system, which is available to employees, business partners, and anyone else, regardless of place or time. It enables people to either seek advice on, or to report violations of applicable laws, business and ethical principles, and internal **3** Austria guidelines, either by name or anonymously.

HTHKH's designated whistleblowing channels have been established for both employees and third-parties to report any illegal or unethical incidents that violate laws or the HTHKH Code of Ethics.

INCIDENT REPORTING FOR BOTH EMPLOYEES AND THIRD PARTIES IN HTHKH

All HTHKH employees and relevant stakeholders, including customers, suppliers, creditors and debtors, are strongly encouraged to report any suspicions of misconduct, malpractice or fraud via the confidential reporting channels. Investigations on incidents or suspected incidents of fraud and corruption are conducted in a timely and highly confidential manner. Internal Audit assumes responsibility for reviewing each reported incident and promptly escalating significant incidents to the Audit Committee.

A summary of reported incidents, alongside relevant statistics including the outcomes of independent investigations and actions taken, is presented to the Chief Financial Officer on a quarterly basis. As for substantiated concerns, appropriate disciplinary actions, including verbal or written warnings and termination of employment, are taken following due management consideration. Any violations of laws and regulations are reported to the police or other law enforcement organisations as applicable.

The Whistleblowing Policy is readily accessible on HTHKH's website and intranet, providing detailed information about the reporting process and procedures.

WHISTLEBLOWING PROCEDURES AT 3 IRELAND

3 Ireland is committed to the highest standards of openness and accountability and recognises that members of the public have a very important role to play in achieving this objective. It has published a Protected Disclosures Policy, encouraging all people, not only employees, to make a disclosure in respect of matters which they reasonably believe to be examples of impropriety or malpractice, whether committed in Ireland or abroad, without fear of reprisal.

This relates to information which, in the reasonable belief of the individual making the disclosure, tends to show one or more of the following:

- Commission of criminal offences
- Failure to comply with legal obligations
- Endangering the health and safety of individuals
- Damaging the environment
- Miscarriage of justice, misuse of public funds
- Oppressive, discriminatory, grossly negligent, or grossly mismanaged acts or omissions by a public body
- Concealment or destruction of information about any of the above wrongdoing.

Reports submitted via the Portal are reviewed by the Protected Disclosures Team and, where appropriate, investigated by independent internal or external parties. Following review or investigation, appropriate actions are taken, and the individual who raised the concern is kept informed through the Portal. **3** Ireland employees also complete a dedicated whistleblowing training module on an annual basis.

CUSTOMER ENGAGEMENT AND RELATIONSHIP MANAGEMENT

Building trusted, long-term relationships with customers is fundamental to how we deliver safe, reliable and inclusive connectivity. CKHGT business units seek to understand customers' experiences and to continuously improve service quality, transparency and accessibility.

CKHGT's approach to customer engagement and relationship management involves listening to customers through structured satisfaction surveys, independent benchmarks and direct feedback channels, providing accessible and responsive channels for enquiries, feedback and complaints, and using customer feedback to strengthen customer service and enhance self-service options.

For example, at **3** Sweden, customer satisfaction is monitored using the Swedish Quality Index (SKI) for the telecommunications sector. This independent study captures customer perceptions across consumer and business segments, enables benchmarking against industry performance, and provides insights to improve services and address evolving expectations around value, flexibility, and the overall experience. At Wind Tre, customer satisfaction is measured through structured surveys covering service, support and overall experience, with insights used to prioritise improvements. The company also participates in the BE Telco brand equity assessment, which evaluates relevance, distinctiveness and visibility. In 2025, the WINDTRE brand maintained a strong and stable brand power score of 14.3, reinforcing its position as a leading, competitive brand for Italian families.

MULTI-CHANNEL FEEDBACK OPTIONS FOR CUSTOMERS OF HTHKH

HTHKH has implemented a Customer Feedback Management Policy and provides multiple channels for customers to share feedback, including a 24/7 customer service hotline, iChat, WhatsApp, email, an online enquiry form and a mailing address. A dedicated Customer Relations Team manages complaints through a centralised logging system, working with relevant departments to investigate cases and provide solutions within three days. Root causes are identified and shared internally to support service and policy improvements. HTHKH's objective is to offer convenient, accessible and effective feedback mechanisms, supported by timely and thoughtful responses.

To capture real-time customer impressions, SMS surveys are sent immediately after enquiry calls. The Quality Assurance Team compiles survey results for management review and frontline performance evaluation. Low-scoring responses are flagged for investigation, with follow-up conducted where necessary. Survey outcomes and improvement actions are reviewed in bi-weekly meetings.

HTHKH adheres fully to the Code of Practice for Telecommunications Service Contracts and participates in the Customer Complaint Settlement Scheme established by the Communications Association of Hong Kong, which supports mediation of billing disputes. Internal complaint-handling targets are in place to monitor service quality and ensure issues are addressed promptly and effectively.

CUSTOMER SATISFACTION AND SERVICE QUALITY IN 3 AUSTRIA

3 Austria continuously monitors and improves customer experience through structured measurement and targeted service enhancements. Monthly customer satisfaction surveys are conducted across voice and internet services, covering key indicators such as overall satisfaction, network quality, pricing, waiting time, customer service and friendliness, and Net Promoter Score (NPS), with a representative sample of approximately 800 customers. Open-text feedback is analysed using sentiment and clustering methods to identify improvement opportunities.

In 2025, a comprehensive service improvement programme was launched, focused on reducing waiting times, strengthening friendliness and solution competence of customer service staff, increasing first-contact resolution, expanding customer self-service options, and simplifying customer journeys to lower customer effort. Measures included advanced agent training, technical skill development, improved call handling capacity, expanded digital self-care resources, and continuous process optimisation.

*Customer service in **3** Denmark*

Business units are also innovating in their use of AI to enable a better customer service experience. Together, these elements are helping CKHGT strengthen trust and create positive outcomes for customers and end-users.

24/7 GENERATIVE AI CHAT DOUBLES POSITIVE CUSTOMER EXPERIENCE

Prior to the widespread commercial availability of generative AI (GenAI), **3** Sweden already used chatbot support in combination with escalation to a professional customer service team as a core element of its customer service experience. In 2025, **3** Sweden successfully integrated GenAI into existing chatbot journeys, significantly increasing automation while maintaining responsible AI standards and transparent communication. It is also expanding access to customer-specific data to deliver more relevant, immediate responses.

The results of this initiative have been highly positive. The share of fully automated conversations has tripled, while positive customer feedback has doubled. Customers now receive more accurate, context-aware support at any time, and **3** Sweden's customer service teams are able to focus on more complex, value-adding interactions.

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 Systems) and ISO 14064-1 (Greenhouse Gases). During 2025, Wind Tre had eight external audits and ten internal audits – all related to environmental management systems.

3 Ireland retained its ISO14001:2015 Environmental Management System certification, as did HTHKH for selected locations. Business units with certification represented over 71% of CKHGT operations at the end of 2025.

Environmental targets

As outlined in the 'Environmental Transition and Resilience' chapter of this report, 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 approved by the SBTi in 2025. All business units are working collaboratively towards these targets.

Additionally, a number of business units have set individual targets across aspects of environmental management including percentage of renewable electricity, reductions in business travel, take-back of devices for reuse and recycling, and responsible recycling of network and office waste.

In 2025, and as outlined in the 'Sustainability Governance and Reporting' chapter of this report, CKHGT established new ESG targets in the short-term incentive plans of management across all European business units. Short-term targets include an increase in purchased renewable electricity, and supplier engagement on GHG emissions reductions. In 2026 this framework will be further expanded to include several long-term environmental targets.

SUSTAINABLE PROCUREMENT AND SOCIAL SUPPLIER STANDARDS

Sustainable procurement policies and frameworks

Sustainable procurement, involving the identification and management of ESG 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 the 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 Code of Conduct, the requirements are applicable to all suppliers, including 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.

Each business unit has a more detailed, local level Supplier Code of Conduct, aligned to CKHH and CKHGT policy, and provided to new suppliers, with most business units requiring confirmation of compliance from suppliers.

WIND TRE SUSTAINABLE PROCUREMENT POLICY

Wind Tre has adopted a Sustainable Procurement Policy that defines a structured and responsible approach to sourcing throughout the supply chain. This policy sets clear and binding standards for all suppliers qualified in the Wind Tre Supplier Register, with the aim of promoting sustainable practices, reducing environmental impacts, and protecting human and labour rights. All suppliers qualified in the Wind Tre Supplier Register are required to subscribe to the principles of the SA8000 standard, which promotes respect for human rights and ethical working conditions, including the prevention of child labour, forced or compulsory labour. Over the reporting period, no incidents related to child labour, forced or compulsory labour were reported.

During the reporting year, **3** Sweden updated its Code of Conduct for Business Partners, encouraging its business partners to commit to setting GHG reduction targets in line with the Paris Agreement and the 1.5°C goal.

Continuous improvement

CKHGT is committed to continuously improving procurement practices to address sustainability topics in the supply chain. In 2025, a CKHGT Sustainable Procurement Forum was held with procurement leads and sustainability leads from all business units. There is now a regular cadence of meetings, aiming to upskill teams, share learnings, leverage existing solutions, and progress on procurement-related sustainability goals.

As part of this collaboration, CKHGT mapped current maturity of sustainable procurement processes across the business units. Moving forward, this collaboration will identify common areas for enhancement of practices across the procurement lifecycle. This will include preparations to support compliance with the EU's forthcoming CSDDD, including further embedding of supplier prioritisation based on an assessment of environmental and social risks.

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.

All business units have established processes for sustainability assessment of suppliers, either through a dedicated third-party sustainability assessment platform, or a bespoke in-house questionnaire. As outlined in the 'Sustainability Governance and Reporting' chapter, in 2025, CKHGT established new ESG targets in the short-term incentive plans of management across all European business units, which included a short-term supplier sustainability assessment target, further reinforcing and growing the use of sustainability assessment and due diligence practices.

A number of business units integrate sustainability criteria into supplier tendering processes or are working towards this.

3 AUSTRIA SUPPLIER DUE DILIGENCE FRAMEWORK

In 2025, **3** Austria released the first version of its Supplier ESG Due Diligence Framework, which outlines the key processes for assessing ESG risks across the supplier landscape and aligns with the company's Climate Strategy and ESG commitments. The framework will be expanded over time as regulatory requirements, industry practices and internal priorities evolve. It provides stakeholders with a clear overview of roles, responsibilities and the regulatory foundations that guide **3** Austria's due diligence approach, highlighting the role of these measures in supporting sustainable and compliant business operations.

BUSINESS PARTNER DUE DILIGENCE IN HTHKH

HTHKH has 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.

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.

HTHKH invites selected business partners and suppliers to provide information on their sustainability performance by completion of the Sustainability Questionnaire. The questionnaire addresses the adoption of relevant practices and policies in areas such as sustainability governance, environmental protection, ISO adoption, health and safety, human rights, supply chain management and information security, and forms part of the supplier evaluation process. In 2025, HTHKH evaluated 61 of its 698 suppliers.

SUPPLIER ASSESSMENT IN 3 IRELAND

In 2025, **3** Ireland continued to strengthen its sustainable procurement programme using EcoVadis tools, including the EcoVadis platform, EcoVadis Vitals and IQ Plus. These tools support annual assessments of supplier sustainability performance and ongoing monitoring, with expired scorecards systematically requested and updated to maintain transparency across the supply base.

3 Ireland set a target to assess 95% of suppliers by spend and exceeded this target by the end of 2025, with 96% of suppliers assessed, up from 87% in 2024.

SUSTAINABLE SUPPLIER MANAGEMENT AT WIND TRE

Wind Tre integrates ESG criteria into supplier qualification, selection and ongoing management. All new suppliers are assessed on ESG factors, with results incorporated into the vendor rating used for tender awards and inclusion in the Supplier Register.

Supplier ESG performance is monitored through the Cribis Synesgy digital platform, which requires suppliers to complete an annual ESG questionnaire as part of qualification renewal. The platform provides ESG scores and sector-specific improvement actions, enabling Wind Tre to track progress over time. Wind Tre may also carry out audits directly or through third parties, with appropriate notice, including targeted audits on SA8000-related topics based on supplier criticality and product category. Where non-compliance is identified, suppliers are required to implement recovery plans, with follow-up checks to verify effective implementation.

In 2025, Wind Tre expanded its supplier ESG monitoring activities, engaging selected suppliers through dedicated ESG meetings, and achieved ESG assessment for 65% of Procurement-managed suppliers, with plans to extend coverage further. Wind Tre also promotes diversity and inclusion in its supply chain by incorporating related criteria into supplier evaluation and encouraging participation by businesses owned by women, minorities and vulnerable groups.

To support consistent and responsible implementation, procurement staff receive structured training in sustainable procurement through the ADACI (Italian Association of Purchasing and Supply Management) professional certification programme, covering topics such as ISO 20400, responsible sourcing, sustainability KPIs and supply risk management.

Conflict minerals

Conflict minerals (tin, tungsten, tantalum and gold – commonly referred to as 3TG) are minerals that can finance armed conflict or are mined 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 ESG risk supplier assessment process using EcoVadis or a similar tool. During 2026, there will continue to be a focus on extending CKHGT's due diligence processes, including with respect to conflict minerals and to prepare for upcoming regulatory changes such as the CSDDD.

HEALTH AND SAFETY

CKHGT is committed to providing a safe and healthy working environment for its employees, contractors and other third parties. It complies with, and where appropriate exceeds, applicable health and safety laws and regulations, and applies industry-specific best practice standards across its operations.

All business units manage health and safety in line with the CKHH Health and Safety Policy and aligned local policies. During the year, Wind Tre and HTHKH maintained ISO 45001:2018 Occupational Health and Safety Management System certification for designated sites, with certified business units representing over 62% of Group operations by revenue.

Business units conduct regular risk assessments to identify potential hazards and implement appropriate control measures to minimise health and safety risks. Accident and incident response procedures are in place across operations to support effective management and continuous improvement.

In Wind Tre, the Facilities Management department defines safety standards and procedures to meet regulatory requirements and ensures that systems are designed and implemented to protect employees and company assets. Risk assessments address hazard identification, required protective measures, safety training needs and the use of personal protective equipment.

In **3** Austria, health and safety instructions apply to all employees and subcontractors, setting minimum requirements for fire safety, occupational health and safety, hygiene and related matters. Occupational accidents and near-misses are recorded, with root cause analyses and corrective actions implemented.

Training is a core element of CKHGT's approach to health and safety. Business units provide regular training covering topics such as fire safety, first aid, personal security, occupational health and safety and environmental awareness. This includes specialised training, such as tower-climbing safety courses for field technicians at **3** Denmark and occupational safety training for employees working with electrical equipment at **3** Austria.

Health and safety of third-parties

CKHGT seeks to work with contractors, suppliers and business partners who share its commitment to health and safety. Business units incorporate specific health and safety clauses into contracts, with risks assessed during tendering and monitored throughout project implementation.

Contractor safety performance is reviewed through periodic meetings, site inspections and final testing. At **3** Sweden, contractors are required to prepare a work environment plan and conduct a risk analysis before work commences. At **3** Denmark, regular risk assessments and annual maintenance and safety inspections are conducted across network sites to ensure safe working conditions and secure infrastructure.

HTHKH integrates health and safety considerations into its supplier selection process through a sustainability questionnaire, with performance forming part of the tender evaluation. For employees working on radio base stations, HTHKH follows the Office of the Communications Authority's Code of Practice for the Protection of Workers and Members of the Public Against Non-Ionising Radiation Hazards from Radio Transmitting Equipment.

Wind Tre's contractual standards include requirements governing the treatment of suppliers' personnel, including compliance with collective agreements and relevant workplace safety and labour legislation. Health and safety expectations are embedded within the Sustainable Procurement Policy and are a condition for supplier qualification. Contractors are required to comply with SA8000 certification standards, promoting safe and dignified working conditions. Compliance is supported through audits, monitoring questionnaires and improvement plans where needed. Wind Tre also provides training support and ESG self-assessment tools, encouraging suppliers to strengthen sustainability and wellbeing practices across the supply chain.

FOSTERING A CULTURE OF HEALTH AND WELLBEING AT HTHKH

HTHKH prioritises employee health and wellbeing, recognising that a healthy workforce is fundamental to long-term business success. In addition to comprehensive medical benefits, HTHKH periodically offers health check-up promotion programmes to encourage proactive health management.

To ensure prompt care in the event of an accident, designated first aiders are in place and first aid kits are available on each office floor. Regular fire drills and first aid training sessions are conducted to maintain preparedness and emergency response capability. Occupational health and safety requirements are communicated to employees through working instructions.

HTHKH also organises health-related talks and workshops to raise awareness of key health topics and to support employees in making informed decisions about their wellbeing.

ELECTROMAGNETIC RADIATION

Operating in accordance with national and international standards

CKHGT takes health and safety seriously and is committed to applying robust scientific and safety standards across all operations. Network sites are designed, built and operated in line with international best practice in mobile telecommunications and in compliance with all applicable national and international standards, including those relating to electromagnetic fields (EMF).

The International Commission on Non-Ionising Radiation Protection (ICNIRP) has developed internationally-recognised guidelines for EMF exposure, setting safe operating limits for radio wave transmissions and defining safety zones around antennas. These limits have been assessed and endorsed by the World Health Organization (WHO) and by the European Commission's Scientific Committee on Emerging and Newly Identified Health Risks. The WHO has stated that no adverse health effects have been established as being caused by mobile phone use, while the European Commission has concluded that EMF does not represent a health risk where exposure remains below existing limits.

Business units are required to operate their networks within safe limits and to monitor compliance with applicable EMF requirements. In some markets, compliance is subject to external oversight by national regulators. For example, in Ireland, the Commission for Communications Regulation carries out regular monitoring and measurement of non-ionising radiation on **3** Ireland's network.

Specific absorption rates

Business units ensure that the Specific Absorption Rate (SAR) of mobile devices remains below recommended thresholds. SAR refers to the maximum amount of radio frequency energy that a user may absorb from a device and is typically expressed in watts per kilogram (W/kg).

In Hong Kong, SAR compliance for handheld mobile devices is overseen by the Office of the Communications Authority (OFCA), which manages radiation safety requirements for mobile devices placed on the market. OFCA provides publicly accessible information on SAR values and maintains a list of devices that comply with prescribed radiation safety requirements. All mobile devices sold locally must comply with exposure limits recommended by ICNIRP or the Institute of Electrical and Electronics Engineers (IEEE), both of which set a SAR limit of 2 W/kg.

3 Austria and other mobile operators communicate SAR principles and device-specific SAR values through the industry body Forum Mobilkommunikation (FMK), with information made available online for customers.

Participating in industry dialogue

A number of business units actively participate in industry dialogue on EMF. For example, **3** Austria and **3** Sweden engage in industry fora to share information and best practice, while **3** Denmark has collaborated with other local operators to develop guidance on compliance with exposure limits. In Italy, Wind Tre engages with national institutions and consumer stakeholders to raise awareness of differences between Italian and other European electromagnetic emission limits.

Sign-posting customers to information

Business units provide customers with access to reliable information on EMF for those seeking further detail or reassurance. For example, **3** Sweden collaborates with other operators and industry organisations to raise awareness through published information materials and a designated EMF spokesperson. **3** Denmark works with other operators through the Danish Telecommunication Industry association to direct customers to information on EMF and to the Danish Health Agency, which is responsible for setting exposure limits and overseeing the safety of radio equipment.

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 business units, certifications are required from vendors or maintained directly within operations.

CKHGT's largest business unit, Wind Tre, representing 54% of operations, maintains ISO 9001 Quality Management System (QMS) certification over 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.

BUSINESS CONTINUITY PLANNING

The continuity of telecommunications services is critical to customers, emergency services and the wider economy. As networks become more complex and the risk landscape– including cyber threats, extreme weather events and system failures – continues to evolve, effective business continuity planning plays a key role in maintaining essential services, protecting customers and supporting operational resilience.

Across CKHGT and aligned with CKHH, business units maintain business continuity, crisis management and disaster recovery arrangements tailored to the local market and regulatory environments, with several shared components.

All business units maintain Business Continuity Plans (BCPs) as part of their broader risk management arrangements. These plans are designed to minimise disruption to operations, customers and employees during significant incidents or major planned activities, and to support the continued delivery of critical services. They are typically informed by Business Impact Analyses which identify critical services, the potential impacts of disruption, and recovery priorities.

BCPs typically define roles and responsibilities, response and recovery actions, resumption arrangements, and communication protocols for internal and external stakeholders. Regular continuity exercises and drills are carried out, with lessons learned captured through structured debriefs and used to strengthen plans and response capabilities over time.

Business continuity arrangements are supported by crisis management procedures, which provide the governance and escalation framework for managing major or rapidly escalating incidents. Crisis management procedures set out how incidents are escalated, how senior leadership is engaged, and how priorities are determined to protect people, critical services, regulatory obligations and organisational reputation. Crisis teams oversee the activation and coordination of business continuity measures and ensure timely and consistent communication with key stakeholders.

Within HTHKH, crisis management procedures are initiated ahead of, and operate alongside, recovery activities. Disaster recovery efforts are overseen by a Crisis Management Team comprising senior executives, including the CEO, Chief Financial Officer (CFO) and CTO, alongside business unit representatives. Annual crisis drills are conducted to test preparedness across a range of potential scenarios and to support effective coordination and decision-making.

Disaster Recovery Plans (DRPs) support business continuity by enabling the restoration of IT systems and telecommunications networks following disruptive events. All business units maintain DRPs covering systems and applications in scope, with defined recovery objectives and escalation processes.

Disaster recovery programmes are used to assess and test recovery capabilities on an ongoing basis, including preparedness for scenarios such as system failures and cyber incidents. Where gaps are identified, remediation actions are tracked and addressed.

Formal disaster reporting procedures are in place, requiring prompt notification once a disruption is identified, escalation to relevant stakeholders and senior management, and regular updates on recovery progress. Following resolution, post-incident reports are prepared to document timelines, key decisions, lessons learned and opportunities for improvement, supporting continuous enhancement of recovery readiness.

For climate-related extreme weather events, business units also have adaptation and risk mitigation measures in place to support continuity of operations. These measures are described further in the 'Climate adaptation' section of this report.

CONTINUOUS ENHANCEMENT OF THE WIND TRE BUSINESS CONTINUITY FRAMEWORK

Wind Tre has established a comprehensive Business Continuity Framework aligned with the ISO 22301:2019 standard, with BCPs in place for all critical processes across economic, legal, reputational, strategic and operational dimensions. The framework is subject to continuous improvement, including periodic external specialist review to support alignment with evolving best practice.

In 2025, Wind Tre further strengthened its approach by introducing a continuous change management process to ensure organisational, regulatory, technological and operational changes are systematically assessed and reflected within its BCPs.

Complementing this, Wind Tre operates a structured disaster recovery programme to strengthen the resilience of its IT and telecom network systems. The programme includes regular disaster recovery testing across applications and systems to assess recovery readiness, identify vulnerabilities and enhance preparedness for critical scenarios, including system failures and cyber incidents. Recovery capabilities are supported by dedicated playbooks, tabletop exercises and formal reporting.

Ongoing capability-building remains a focus. During 2025, Wind Tre continued specialist training and regular BCP testing. A mandatory employee awareness programme was also rolled out to reinforce the importance of business continuity and organisational resilience.

3 IRELAND'S BUSINESS CONTINUITY FRAMEWORK

3 Ireland maintains a business continuity programme incorporating crisis management. The programme is fully aligned with the IT Security framework and Government-driven Public Warning System process. Incident impact thresholds are pre-established and regularly reviewed to ensure that **3** Ireland responds efficiently regardless of the incident scenario. **3** Ireland's IT security response arrangements include its SOC to facilitate prompt, effective detection, containment, investigation, and recovery.

INTEGRATED OPERATIONAL RESILIENCE AT 3 DENMARK

3 Denmark maintains an integrated operational resilience framework supported by well-defined business continuity, contingency and crisis management processes. In response to evolving regulatory requirements, including NIS2 and telecommunications legislation, the company has initiated a comprehensive business mapping exercise to identify critical processes and interdependencies, conduct business impact assessments, define recovery requirements and acceptable downtime, and strengthen continuity plans for the most significant risk scenarios. Responsibility for IT systems and disaster recovery sits with technical teams, ensuring alignment between business continuity objectives and recovery capabilities. This integrated approach enables **3** Denmark to balance lean operations with strong compliance and long-term operational resilience.

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.

DIGITAL SOLUTIONS AND IMPACT

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 an opportunity to play a fundamental and positive impact on society, enabling every aspect of digital life.

At the same time, CKHGT has 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.

ENABLING IMPACT THROUGH CONNECTIVITY, DIGITAL SOLUTIONS AND AI

Connectivity, digital solutions and AI are integral to society, delivering social, economic, and environmental benefits such as access to information, education, healthcare, economic opportunity, social inclusion, public safety, energy efficiency, water efficiency and more. CKHGT recognises the powerful role it has to play in enabling a sustainable digital society through innovating and developing sustainable business models, networks and products.

Intelligent, cloud-native networks

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

In 2025 CKHGT continued to invest in the development of its networks, working with its partners to further integrate 5G, cloud-native technology and advanced AI capabilities for greater operational efficiency, enhanced customer experience, network resilience and sustainability. These investments offer faster, more secure and reliable connectivity, supporting innovative digital solutions with flow-on benefits in a range of sectors, and an enhanced customer experience.

AI-POWERED CLOUD-NATIVE NETWORK TRANSFORMATION

HTHKH and Huawei International Co. Limited signed a strategic Memorandum of Understanding at Mobile World Congress 2025 in Shanghai to accelerate the deployment of cloud-native intelligent infrastructure. The collaboration aims to enhance network operations, efficiency, and customer experience through the integration of AI, big data, and cloud technologies.

The upgraded cloud-native network will introduce advanced AI capabilities, including real-time traffic prediction, proactive stress testing, and automated detection of network anomalies, enhancing performance during high-traffic events, improving resilience during emergencies or extreme weather, and ensuring secure transmission of critical services such as public safety and medical data.

This initiative builds on the companies' prior collaboration in advancing green 5.5G networks and represents a significant step toward AI-powered telecommunications.

Strategic MoU on Deployment of Cloud-native Intelligent Infrastructure

CORE NETWORK MODERNISATION FOR ADVANCED 5G SERVICES

In September 2025, **3** Austria announced a multi-year strategic partnership with Ericsson to modernise its core network, strengthening the foundation for faster, more secure, and energy-efficient connectivity. The initiative supports **3** Austria's long-term network strategy and Austria's broader digital transformation goals.

As part of the modernisation, **3** Austria will deploy Ericsson's cloud-native, dual-mode 5G Core on Ericsson Cloud Native Infrastructure Solution (CNIS), enabling unified operation of 4G and 5G networks. The new architecture introduces higher levels of automation and AI-driven operations, improving scalability, operational efficiency, and time-to-market for new services.

The modernised core will enable advanced 5G use cases including network slicing, massive IoT, and programmable networks, supporting enterprises across manufacturing, healthcare, and logistics. For consumers, it enhances everyday experiences such as streaming, gaming, and remote work. Overall, the initiative delivers a future-ready, sustainable core network that positions **3** Austria to meet rising data demands and unlock new digital services.

NETWORK OPTIMISATION WITH VIRTUAL DRIVE TEST TECHNOLOGY

Wind Tre has partnered with NTT DATA and RADCOM to implement Virtual Drive Test technology, a cloud-based solution that monitors mobile network quality across Italy's roads and railways. This approach replaces traditional physical drive tests with virtual analysis using real network traffic data, ensuring confidentiality and security while reducing operational costs and environmental impact.

The Virtual Drive Test service analysed data over a 14-day period covering more than 143,000 kilometres of road and rail routes. It processed over 600 million data connections and 9 million calls, totalling 135,000 hours of voice and data traffic compared to only 140 hours achievable with traditional methods, and enabled Wind Tre to identify large-scale priorities for network optimisation and improved customer experience. At the same time, the initiative avoided approximately 15 tons of CO_2 emissions which would otherwise have been created through physical drive tests.

Innovative uses of 5G and AI

5G networks offer more energy-efficient transmission at the high levels of data traffic required by society today, as outlined in the chapter 'Environmental Transition and Resilience'. In addition, their super-fast data speeds, consistency of connection, and low latency, support the development of innovative applications across all sectors of the economy.

CKHGT continues to work with its partners to develop and deploy innovative solutions that leverage the benefits of 5G for positive impact and collaborates in initiatives to promote 5G innovation.

For example, during the reporting year, Wind Tre led a project with partners combining 5G connectivity with drone technology for effective responses to natural disasters and continued to expand the use of its Energy Supervisor solution, supporting energy monitoring and management. HTHKH hosted the 3Business EMPOWER Partnership Summit, bringing together major technology companies and other businesses to promote innovation in the use of 5G and AI technologies, and continued to offer a range of innovative 5G solutions for positive impact across sectors such as AI and property. Its 3Education portfolio leverages 5G connectivity along with a range of other technologies to support an enhanced education environment.

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 teaching or guiding tasks, and use of AI, augmented and virtual reality technologies to support enhanced teaching and learning experiences.

In 2025, HTHKH expanded its offering with new AI-enabled solutions, including an AI Writing Grading System that allows students to upload images of handwritten essays for automated assessment, supporting teachers with one-click marking. HTHKH also developed an AI Presentation Training Platform to help students improve presentation skills by providing guidance on intonation, rhythm, emotional expression, language use and gestures.

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. In 2025, Wind Tre implemented the Energy Supervisor service for a consortium of municipalities in the Tuscany Region, enabling benchmarking of energy consumptions across municipal sites and identification of opportunities for energy efficiency.

5G AND DRONES TO BOOST ENVIRONMENTAL PROTECTION AND PUBLIC SAFETY

Wind Tre, together with the Municipality of Turin and the Polytechnic University of Turin, is leading the European initiative '5G4Lives – 5G for a Better Tomorrow: Protecting Lives and the Environment'. The project leverages 5G connectivity and advanced drone technology to monitor air quality and assess territorial vulnerabilities in real time, enabling faster and more effective responses to natural disasters. Equipped with infrared sensors, drones can detect fires, people, and animals in hazardous conditions, supporting search and rescue operations and reducing intervention times. Backed by the Connectivity Europe Facility grant, 5G4Lives promotes interoperability across Europe and develops protocols for Beyond Visual Line of Sight (BVLOS) flights. This initiative demonstrates how next-generation networks and IoT-driven solutions can make cities safer, more resilient, and environmentally sustainable.

HTHKH 3BUSINESS EMPOWER PARTNERSHIP SUMMIT 2025

HTHKH aims to bring new insights to businesses on opportunities to leverage advancements in AI and 5G for increased productivity and wider benefit. During the year, it hosted the 3Business EMPOWER Partnership Summit 2025, a large-scale exhibition featuring over 20 leading technology companies and showcasing innovative corporate solutions using AI and 5G. The event covered topics such as the transformation of the transport sector by the 'low-altitude economy', the opportunity for digital transformation of the small and medium-size enterprise sector with the use of AI, and opportunities in smart building management.

3Business EMPOWER Partnership Summit

Partnering for sustainable cities

By 2050, nearly 70% of the world's population will be located within cities[7], where approximately two thirds of all energy is consumed each year and over 70% of the world's GHG emissions are generated[8], highlighting the important role of smart, digital cities in decarbonisation of the global economy. CKHGT is enabling smart cities through its intelligent networks and innovative technologies, as well as driving initiatives that promote awareness and adoption of the opportunities available for smart cities.

[7] World Bank, '*Urban Development*'.
[8] IEA, '*Empowering Cities for a Net Zero Future*'.

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 supports cities' digital and green transition as an advisor on energy efficiency, smart mobility and related solutions. In 2025, a further nine cities joined the programme, bringing total participation to 50. Wind Tre continues to work with local institutions to extend, strengthen and modernise digital infrastructure. Available services include mobile and video analytics to analyse tourist flows, energy management solutions, mass alerts for critical events, and IoT services to enhance citizen safety, environmental monitoring, and management of urban services such as traffic and waste.

In 2025, Wind Tre also launched 5G Standalone, enabling ultra-low latency, greater reliability and customisation. Through network slicing, public administrations and businesses can access dedicated network segments for critical applications, without the costs of private infrastructure, supporting advanced use cases in smart mobility, urban security, smart industry and digital healthcare.

The smart city programme also focuses on skills development for public administrators, with the 'Smart City Transformation Academy'. Building on this initiative, in 2025 it launched the new 'Wind Tre Executive Education Programme'. The goal of the programme, organised in collaboration with SDA Bocconi and AUSED – a community of Chief Information Officers in Italy - is to train the next generation of smart city leaders in public administration.

SHOWCASING SMART CITIES APPLICATIONS IN HONG KONG

DIGIBox, HTHKH's 5G solution hub, hosts visits from educational institutions and students through interactive programmes showcasing the potential of 5G and emerging technologies such as Web 3.0 and AI. The facility includes dedicated zones covering smart city, smart port, smart retail, smart education, smart care, smart restaurant, and AI and future applications. In 2025, over 90 educational organisations visited the DIGIBox participating in immersive demonstrations of 5G-enabled solutions across multiple sectors. Visits also included a workshop on AI EdTech solutions and digital drawing, designed to introduce AI concepts and inspire interest in innovation and creativity among younger audiences.

Students at the HTHKH DIGIbox solution hub

AI and advanced data analytics

CKHGT goes beyond integration of AI and advanced data analytics within its own network and operations, also offering AI-driven digital solutions to business and governments, either as standalone products or in combination with connectivity and IoT solutions. These solutions enable smarter, data-driven decision-making across sectors, supporting applications such as smart cities, transport planning and intelligent transport systems, energy optimisation and environmental monitoring.

CKDelta is CKHH's dedicated data science and AI business operating under CKHGT, specialising in the design and development of innovative solutions using diverse and unparalleled data sets from across CKHH and other partners. Through an agentic AI platform, a suite of intelligent applications and AI services, 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.

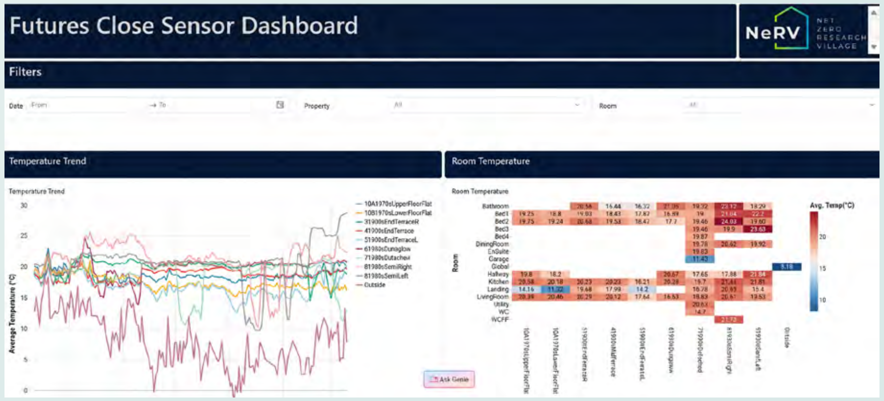
Individual business units also have dedicated teams with in-country, advanced data analytics capabilities and datasets, which they are using to assist Governments and businesses solve complex problems and take better, data-driven decisions.

These capabilities offer new opportunities for impact in a range of areas including urban mobility planning, smart energy management, resource efficiency and decarbonisation.

NET ZERO RESEARCH VILLAGE

The Net Zero Research Village (NeRV) programme demonstrates how robust digital infrastructure can act as a critical enabler of sustainability research and evidence-based decarbonisation. Working with Northern Gas Networks, CKDelta designed and deployed a real-time IoT Lakehouse on Databricks to support the UK's first whole-system, domestic-scale research environment integrating gas, electricity, and water. The platform consolidates high-frequency sensor data from nearly 2,000 IoT signals across nine representative homes, transforming previously fragmented telemetry into governed, analytics-ready datasets. By applying a secure architecture with automated data quality checks, lineage, and access controls, the solution significantly reduced time-to-insight while increasing trust in the underlying data used for net zero research.

From a sustainability perspective, the platform provides a scalable foundation for understanding how households consume energy and water under real-world conditions, rather than theoretical models or short-term pilots. Innovators, researchers, and policymakers can now analyse interventions, technologies, and behavioural changes with greater accuracy and speed, enabling more effective pathways to decarbonisation. Importantly, the Lakehouse is designed not just for current reporting and dashboards, but to support future AI-driven forecasting, predictive analytics, and scenario testing. By investing in data governance, resilience, and extensibility from the outset, the NeRV platform helps ensure that sustainability insights generated today remain usable, comparable, and actionable as net zero ambitions evolve.



NeRV sensor dashboard

CKDELTA AND WIND TRE BUSINESS DATA ANALYTICS FOR URBAN PLANNING AND SUSTAINABLE EVENTS

In 2025, CKDelta and Wind Tre Business collaborated during the Rome Marathon 2025 to analyse runner mobility using anonymised telecommunications data. The analysis provided insights into participant origins, travel modes and duration of stay, highlighting the significant tourism impact of the event. These insights can help support city authorities with data-driven tools to improve event planning, logistics, safety and economic assessment, while also demonstrating how telecommunications data can contribute to smarter cities, sustainable tourism and more effective urban infrastructure planning.

SUPPORTING A MORE SUSTAINABLE URBAN ENVIRONMENT IN SWEDEN

The achievement of Sweden's climate targets requires a rapid decrease in emissions from transport, necessitating a shift towards more sustainable travel. **3** Sweden continues to support the City of Stockholm, using its privacy-protected population movement data enhanced with Train Brain Movement Analytics, to enable more evidence-based decision making in transport and climate policy.

During 2025, the City of Stockholm has conducted testing using **3** Sweden's population movement data in preparation for the introduction of Environmental Zone 3 – one of the most ambitious policy measures internationally, aimed at accelerating the transition to emissions-free transportation in an urban environment. This testing evaluated effects of the new zone on people by age, gender, and geographic residence, supporting plans for a transition that is both effective and equitable.

Through this work, **3** Sweden strengthens its role as an enabler of a data-driven and responsible climate transition.

WIND TRE AND THE MUNICIPALITY OF FLORENCE

During the reporting year, the Municipality of Florence adopted Wind Tre's Big Data Analytics solution, to support with strategic decision-making in relation to tourism, transportation, and communications. This solution uses aggregated, anonymised socio-demographic attributes, together with presence and mobility route data to help better understand visitor movements. Through its interactive dashboard the Municipality of Florence can better understand visitor flows, assisting with the development of sustainable urban policy and investment decision-making.

Private networks

For a range of its larger customers, CKHGT's dedicated innovation business, CKH IOD, is working in partnership with business units to design and manage private 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.

Looking ahead, private slice networks will increasingly offer opportunities for customers to segment different applications or user groups – each with their own latency and security characteristics optimised for different needs.

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

5G NETWORK SUPPORTS AUTOMATION IN HUTCHISON'S UK PORTS

In 2025, CKH IOD launched the UK's largest private 5G network to support operations at the ports of Felixstowe, Harwich and London Thamesport.
The network supports high-speed, low-latency communications which allows reliable connections for quay cranes, yard cranes and internal trucks to the terminal operating system. At the Port of Felixstowe, the network is providing advanced communications capabilities to a growing fleet of autonomous trucks. These electric vehicles offer lower emissions, 24/7 operations and safe driving capabilities. New applications are already being added to the network, including support for a new engineering management system, allowing more efficient maintenance of key assets, which will reduce unexpected downtime and ultimately allow for faster vessel turnaround and container throughput.

Autonomous truck at Felixstowe port

PRIVATE SLICE NETWORK SUPPORTING AUSTRIAN 5G INNOVATION

In 2025, **3** Austria implemented Austria's first 5G private slice network with edge computing at the 5G Playground Carinthia – Austria's leading open test laboratory for 5G applications where companies and research institutions can explore, test and validate 5G applications under real-world conditions. In October 2025, **3** Austria presented the project to experts from practice and research at an event. The 5G Private Slice Network enables edge computing via 'local breakout' – a 'first of its kind' in Austria, which avoids routing of traffic through a distant core, enabling lower latency, and more efficient use of on-site edge applications.

LPWANs and IoT applications

The number of connected IoT devices worldwide is forecast to more than double from 19.8 billion in 2025 to more than 40.6 billion IoT devices by 2034[9]. IoT devices are used in all types of industries, but particularly in utilities, retail, transportation and storage among others, as well as in the consumer market. Wide-area IoT devices such as connected vehicles and remote monitoring systems accounted for 4.93 billion connections as of October 2025[10].

IoT-enabled solutions are playing an increasingly important role in addressing environmental and societal challenges by enabling real-time monitoring, optimisation and automation of physical systems. Applications across smart cities, transportation systems, smart buildings, smart energy systems, industry, utilities, and agriculture, can realise potential benefits which include operational and energy efficiency, decarbonisation, resource efficiency, and safety. A GSMA study[11] 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 Denmark and Ireland, and LoRaWAN is operational in Austria.

CKHGT business units offer connectivity management through local dedicated IoT platforms, 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 2025, CKHGT grew its IoT connections by 21%, at a similar pace to the previous year, with one of the most significant areas of growth being the connection of residential and commercial electricity meters, where the ability to monitor the energy consumption of assets enables better forecasting and reduced energy wastage. IoT connections were also increasingly used in gas and water meters. CKHGT currently has over six million SIM cards in utility meters across Ireland 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 cases, and transforming business models across a range of sectors and geographies.

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

3 Ireland supports over three million IoT connections and has a market share of over 80%. 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 2025 alone, **3** Ireland facilitated over 470,000 new connections in IoT solutions, including smart energy meters, smart home and building sensors and IoT-enabled cameras. Security remains a key focus, with **3** Ireland ensuring robust protection 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. In 2025, **3** Ireland achieved ISO 27001 certification in relation to its IoT services. 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

[9] Statista, '*Number of Internet of Things (IoT) connections worldwide*'.
[10] Statista, '*Number of connected devices worldwide*'.
[11] GSMA '*Enablement Effect*'.

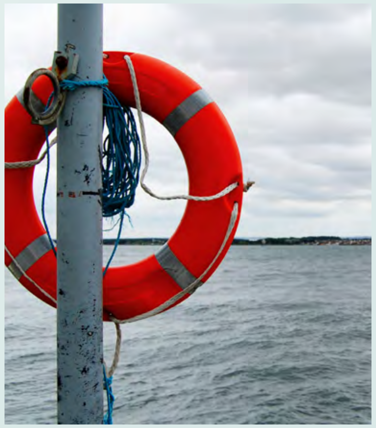
SUSTAINABLE WINTER SERVICES AND ENERGY SAVINGS WITH LORAWAN AND 3 AUSTRIA

3 Austria, in partnership with Maschinenring Service NÖ-Wien and IoT Systems, has introduced an IoT-based solution to optimise winter road maintenance in Lower Austria. Using ground and air sensors connected via Austria's first nationwide LoRaWAN IoT network, real-time temperature data enables precise deployment of gritting vehicles and use of road salt. This approach reduces environmental impact by minimising salt usage, lowers operational costs, and enhances road safety during icy conditions. The energy-efficient LoRaWAN technology supports long-range, low-power data transmission, allowing battery-powered sensors to operate maintenance-free for up to ten years. After a successful pilot phase in 2025 the solution has been deployed across municipalities in Vienna and Lower Austria, reinforcing sustainable infrastructure management.

Municipalities like the City of Wolfsberg use energy-efficient, smart water meters connected via Austria's nationwide LoRaWAN network, to measure water consumption in real time, enabling remote readings, resource savings, and rapid detection of issues such as unexpected leaks. In 2025, the project was expanded with additional sensors, further improving monitoring and response capabilities.

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 WEATHER MEASUREMENT IN AUSTRIA

'Drei Wetter' ('Three Weather') smart weather measurement stations combine machine-to-machine (M2M) connectivity with meteorological sensors providing more precise weather forecasts to 100 municipalities and emergency organisations in lower Austria and enabling optimised use of resources in planning for weather events. The project started with five weather stations in Vorarlberg, and during the reporting year, was expanded to additional regions in Vienna, Lower Austria, and Tyrol, with a goal of establishing a nationwide network of 1,000 weather stations.

Drei Wetter meteorological sensor on a building

SMART ELECTRICITY METERING IN IRELAND

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 2026. 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 reduce GHG emissions. To date, over 2 million smart meters have been installed.

Further, **3** Ireland has partnered with the Active Energy Controls (AEC) 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 its power grid, and to Northumbrian Water in relation to management of water infrastructure.

SUPPORTING THE DIGITAL SAFETY OF CUSTOMERS AND COMMUNITIES

As the digital world has grown, so too has the misuse of the internet and digital communication channels, bringing risks for businesses and consumers.

Digital fraud is a pervasive global issue causing financial losses, disruption, and threats to public safety, as criminals exploit connected devices and communication channels. This includes threats directly to systems, for example from malicious software, and threats aiming to manipulate people, for example through 'spoofing', phishing, and increasingly AI-generated voices, to impersonate trusted sources. At the same time, people are increasingly facing online threats such as cyberbullying and mental health impacts of social media use.

CKHGT has a role to play in developing products and services, and leveraging its skills and resources, to help address these challenges.

Products and services for digital safety and security

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

Wind Tre has long maintained a focusing on growing its portfolio of digital safety products to meet the needs of consumers in this area. It offers mobile security solutions 'Più Sicuri Mobile' ('Safer Mobile') and 'Più Sicuri Mobile Pro' ('Safer Mobile Pro') – which integrates features such as protected internet browsing, a VPN for sensitive data protection, full anti-virus for smartphones, and personal data breach monitoring, helping to protect retail customers from internet-related risks.

It 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.

Addressing the needs of SMEs on both fixed and mobile network services, Wind Tre offers a dedicated cyber security service with more than 850,000 companies covered by Wind Tre's cyber security solutions at the end of 2025. It also maintains a platform with cyber security services and information for consumers, professionals and micro-business customers.

In partnership with award-winning cyber security company Corrata, **3** Ireland offers a business mobile security solution, 3Mobile 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 by businesses than laptop computer security.

HTHKH also offers ZoneAlarm Extreme Security NextGen, a complete security and privacy suite that guards customers against the most sophisticated cyber threats and attacks.

HELPING BUSINESS TACKLE IDENTITY THEFT AND FRAUD

During 2025, CKHGT continued to scale its innovative Digital Identity solution, 'Subscriber Intelligence', supporting businesses in delivering safer online experiences through enhanced identity verification, transaction authentication, fraud risk detection, and regulatory compliance. As cyber-fraud and socially-engineered scams continue to increase, robust and reliable user identity verification remains critical to personal, financial, and socio economic wellbeing.

Developed by CKH IOD, Subscriber Intelligence is an enterprise grade 'Application Programming Interface' (API) product suite that leverages CKHH's mobile data assets for anti fraud use cases. In 2025, CKH IOD further extended the solution through the launch of additional industry led Open Gateway compliant CAMARA Network APIs. In 2025, newly launched products included an age verification API in **3** Austria, **3** Ireland and Wind Tre.

Through the CKH IOD Global Digital Hub, CKHGT now provides access to more than 80 unique data attributes across 16 APIs. These services are available across multiple CKHH business units, including **3** Austria, **3** Ireland, **3** Denmark, **3** Sweden and Wind Tre, supporting international scale and market reach.

To date, more than 750 use cases have been deployed across a broad range of industries, including financial services, eCommerce, social media, gaming, healthcare, transport, and public services, demonstrating strong adoption and versatility of the platform.

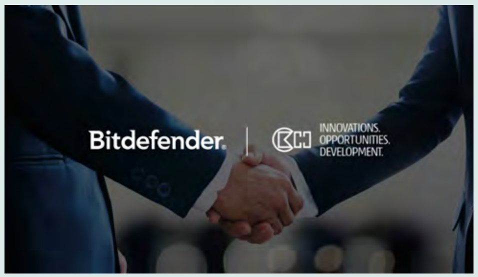
CKHGT is continuing to expand the scope and reach of its Network API portfolio through 2026, delivering increasingly enhanced capabilities to businesses and enterprises that leverage telecommunications network assets for the mutual benefit of customers.

EXPANDING CYBER SECURITY PARTNERSHIPS IN EUROPE

CKH IOD and Bitdefender expanded their strategic cyber security partnership with the launch of the Bitdefender Subscriber Protection Platform for **3** Austria consumer and micro-business customers in November 2025. The rollout delivers comprehensive protection for personal computers and mobile devices against malware, phishing, online scams, identity theft, and other cyber risks, all managed through the unified Bitdefender OneApp interface.

The expansion builds on Bitdefender's existing support for Wind Tre and the **3** UK brand and represents a key milestone in CKHGT's broader European digital security offering for customers.

3 Austria cyber security offering for customers



Bitdefender and CKH IOD partnership

STRENGTHENING CYBER SECURITY FOR BUSINESSES

Cyber security threats against Danish companies are growing rapidly, ranging from phishing and ransomware attacks to severe data breaches. To address these challenges, **3** Denmark has entered a strategic partnership with Arctic Wolf, a global leader in cyber security solutions.

Through this partnership, **3** Denmark's business customers gain access to a comprehensive portfolio of security solutions. These include Managed Detection and Response (MDR), and AI-based infrastructure monitoring. Security Awareness Training is offered to customers for education of their employees, and consulting services are available to help companies develop robust security strategies.

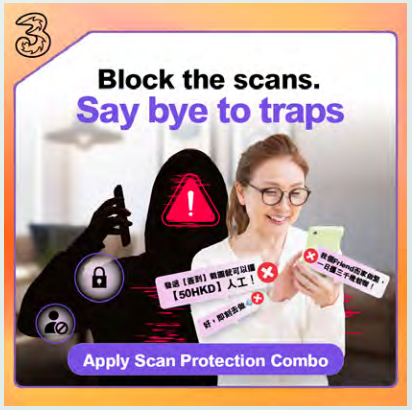
Through these solutions, businesses can proactively protect themselves by detecting and neutralising threats. Cloud environments and digital infrastructures receive full protection, ensuring that companies can operate securely in hybrid and remote setups.

This collaboration reflects **3** Denmark's commitment to supporting its business customers with reliable and effective security solutions in an era where digital threats are constantly evolving.

Business units continue to offer and extend solutions that help protect customers from threats based on manipulation, such as scam phone calls and text messages.

SCAM PREVENTION SOLUTIONS

HTHKH fully supports the 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. HTHKH provides free access to this phone scam prevention service for those aged 60 or above to help protect the elderly from phone scams. It also collaborates with the Hong Kong Police to spread anti-phone scam messaging via SMS and promotes the SMS Sender Registration Scheme.



HTHKH call blocking service for customers

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 2025, this service had been activated and used at least once by more than two million customers.

Wind Tre call blocking service for customers

'SAFE' INITIATIVE FOR RESPONSIBLE SMARTPHONE USE FOR CHILDREN

In 2025, **3** Austria introduced the 'Safe' initiative for families, which includes assistance for parents available across 75 stores, in setting up safety features such as screen time limits, content blocking, and location services, as well as an exclusive partnership with the Austrian start-up Ohana, offering a parental control app to help manage healthy screen time balance and online safety.

***3** Austria's Ohana app for children online safety*

Designed for children aged eight to thirteen, Ohana includes essential features such as app-specific screen time limits with age-appropriate recommendations, safe browsing that blocks inappropriate content, and optional location tracking. Parents can restrict or block TikTok, games, and other apps on their child's smartphone or tablet. Websites are automatically filtered, and Ohana ensures the device switches to locked mode during study or bedtime.

Also as part of the 'Safe' initiative, **3** Austria collaborated with online streaming platform 'LAOLA 1' to produce a three-part video series about online safety for children and young people.

In 2025, **3** Ireland also rolled out several initiatives to help protect customers from scam calls and text messages, including the blocking of inbound international calls that 'spoof' Irish numbers, and marking untrusted SMS messages that have an alphanumeric header as 'Likely Scam'. **3** Ireland blocked more than 26 million suspected scam calls and intercepted over 455,000 fraudulent SMS messages in 2025. **3** Sweden also strengthened customer protection by implementing network-level spoofing filters designed to prevent fraudulent and scam calls. This initiative enhances network security and reduces the risk of harm to customers.

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 programme, 'NeoConnessi', which has reached over 2 million students since 2018.

WIND TRE PROVIDES DIGITAL SAFETY EDUCATION FOR CHILDREN AND PARENTS

In 2018, Wind Tre designed and made available to all, NeoConnessi, a digital responsibility programme for schools that seeks to support families and teachers when children use the internet or devices for the first time. The NeoConnessi programme 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.

Educational programme NeoConnessi

The NeoConesssi Scientific Committee brings together leading experts from the Italian State Police, the Italian Association of Paediatrics, and the National Council of the Order of Psychologists to guide the programme's development. At the end of 2025, the NeoConnessi programme had benefitted over 2 million families since its launch.

To further support families, Wind Tre launched a national television and online campaign in 2025, raising awareness of the importance of guiding children towards responsible digital behaviour and strengthening digital skills within households. Centred on a high-impact educational video, the campaign promotes the use of NeoConnessi learning resources and encourages more conscious and informed engagement with digital technologies.


Wind Tre NeoConnessi television campaign

ENABLING DIGITAL INCLUSION AND ACCESS

Digital exclusion remains an issue affecting populations across most of our operating markets, particularly affecting older people, those with lower incomes, people with lower literacy or education and those living in rural areas. Barriers to inclusion typically involve lack of access to telecommunications networks or devices, affordability issues, or lack of digital skills. CKHGT is working to promote digital inclusion in a range of ways.

Remote community access and inclusion

CKHGT business units are continuously investing in their networks to increase access to digital services, including in rural and remote areas. This includes helping to close the rural-urban connectivity gap that persists in some markets and enabling rural areas to have access to the highest quality of network coverage in others.

3 Sweden has continued to invest in the extension of its 5G network, including 170 new locations in 2025, many in smaller municipalities and rural areas. **3** Denmark has continued to upgrade and extend network infrastructure, particularly in the rural area of Jutland, enabling access to 5G coverage. The long-standing Arranmore Island initiative continues to provide 5G coverage for a remote island on the north-west coast of Ireland, helping business on the island and supporting the reversal of population decline which occurred in past years.

Since 2022, Wind Tre has taken a holistic approach to addressing the infrastructure and skills gaps that have persisted in Italian rural areas through its 'Borghi Connessi', or 'Connected Villages' programme, and since 2024 it has also participated in the 'Mind the Gap' initiative to promote digital inclusion across local Italian communities.

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 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. At the end of 2025, 113 small Italian municipalities had joined the project.

During 2025, the project was recognised with a 'special mention' in the Italy's 'Blue Green Economy awards', promoted by the For Human Community Association to recognise innovative projects in sustainability. The Borghi Connessi project and NeoConnessi programme both also received the 'Certificate of Territorial Best Practice for a More Sustainable Italy 2025' from ASviS, the Italian Alliance for Sustainable Development.

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

FOSTERING PUBLIC AND PRIVATE COLLABORATION FOR DIGITAL INCLUSION AND TRANSFORMATION

During the reporting year, Wind Tre actively participated in the 'Mind the Gap' project, promoted by Fondazione Italia Digitale in collaboration with Wind Tre. The project supports the development of digital skills and promotes digital inclusion across local communities in Italy. It brings together public administrations, businesses and experts through a series of regional events and training activities to strengthen digital capabilities, supporting more efficient public services, improving access to digital tools for citizens and businesses, and fostering public-private collaboration on digital inclusion and transformation.

Digital inclusion for seniors

CKHGT is reducing barriers for senior citizens to access the benefits of digital technology through dedicated information, training and service plans. Wind Tre offers 'NeoConnessi Silver', an extension of its leading NeoConnessi digital safety and inclusion programme, through a section of its portal dedicated to seniors. Its training course, video tutorials, articles and insights are designed to train older people on basic digital skills and strengthen the bond between generations on digital safety.

HTHKH offers service accessibility for senior citizens through 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. In 2025, its efforts were rewarded with a Triple Gold Award and the Elder-Friendly Award in the Digital Accessibility Recognition Scheme organised by Hong Kong Internet Registration Corporation Limited and Digital Policy Office. Also in 2025, employee volunteers from **3** Ireland supported seniors in using their smartphones as part of the Dublin Docklands 'Tech Café' initiative, promoting digital inclusion and empowering older members of the community to engage more confidently with technology.

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

Inclusivity for those experiencing vulnerability or difficulty

CKHGT recognises the importance of inclusive products, services and communications to support those experiencing any form of vulnerability. This can include tailored support for those experiencing significant life events such as bereavement or illness, flexible support and skills-building for those in financial difficulty and help for people to stay connected following major disasters. Support may also include donation of 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.

During the reporting year, communities served by CKHGT continued to be impacted by economic and cost-of-living challenges.

3 Ireland's Care and Retail teams have been trained to identify customers who may be more vulnerable or experiencing specific challenges, including those affected by financial difficulty, bereavement, age, illness, or disability so that tailored support can be offered. It has established compassionate processes to support customers or family members managing accounts during bereavement, ensuring these are handled with sensitivity and minimal stress. It also has a dedicated accessibility service which allows for recording of customer needs and tailored communications. It offers a range of options for support of people in financial difficulty, including flexible payment options, spend controls, and proactive engagement for customers who may be experiencing financial hardship, helping them stay connected while managing costs responsibly.

3 Sweden offers subsidised mobile subscriptions for children, students, and people over the age of 65. These tailored offers make digital connectivity more affordable and accessible for groups that may otherwise face economic or social barriers to participation, enabling more people to stay connected, informed, and engaged in the digital society. HTHKH supports vulnerable groups at the Tung Wah Group of Hospitals CEASE Crisis Centre with the provision of one-year free service plans.

3 Sweden also continues to offer free calls to and from Ukraine, as it has done since the beginning of the ongoing conflict. In the past year, while call traffic from Sweden to Ukraine has decreased slightly, calls from Ukraine to Sweden, have increased. Since the war broke out, **3** Sweden has conveyed a total of over two million call minutes and hundreds of thousands of text messages to and from Ukraine; equivalent to 30 hours of mediated conversations every day for three years.

Accessibility support

CKHGT has long recognised the importance of ensuring that its products and services are accessible for those with disabilities, empowering and enabling all people to access and realise the benefits of digital technology.

All European business units are preparing for the EU Accessibility Act, a law designed to ensure that key products and digital services are accessible to people with disabilities across all EU countries, and to remove barriers for around 87 million people with disabilities in the EU. Since June 2025, companies placing new products on the EU market, including devices such as smartphones, or providing new services, must meet accessibility requirements. Companies providing existing products or services in scope, including telecommunications, must ensure compliance by 2030 under transitional provisions.

ACCESSIBLE CUSTOMER SERVICE AT 3 SWEDEN

In 2025, **3** Sweden improved the accessibility of its digital channels to ensure that as many individuals, including those with disabilities or other accessibility needs, can easily access information and services. It redesigned its website to improve usability, ensure clear navigation, and increase compatibility with assistive technologies, enabling more individuals, including those with disabilities or accessibility needs to easily access information, customer communications, and online services.

Its mobile network and subscriptions support real-time text (RTT) for RTT-compatible hardware, which helps those with hearing or speech difficulties to have 'real-time' conversations. Its customer service function supports communication through Video Relay Services, Text Telephony, and Teletal – a free Swedish telephone service designed for people with communication difficulties. It has developed a short and easy-to-read description of how subscriptions work when a customer chooses to purchase a product through payment of instalments. Mobile phones and routers are also accompanied with relevant information and carry a 'CE marking' that indicates compliance with relevant standards on environment, health, safety and accessibility.

More generally, **3** Sweden ensures that both its website and customer application 'Mitt3' are fully in compliance with accessibility standards.

3 Austria complied with internationally-recognised Web Content Accessibility Guidelines before the new EU Accessibility Act came into effect. In the period leading up to the transition in 2025, it focused on using the new RTT functionalities. An internal Community of Practice (COP) meets on a bi-weekly basis to discuss ways to improve compliance and functionality for accessibility, allowing everyone to benefit from shared experience and collective knowledge.

Wind Tre has implemented measures to increase accessibility for customers, including assessment and remediation of websites and applications and the introduction of accessible product design requirements. Wind Tre aims to create a culture of digital accessibility awareness with accessibility principles integrated into the product design lifecycle ('accessible-by-design') and the introduction of a dedicated accessibility section in the requirements template for all new digital initiatives, ensuring that the topic is considered from the earliest stages of each project.

While not in scope of the EU Accessibility Act, HTHKH is committed to inclusivity, incorporating a wide range of accessibility features to ensure its digital platforms are usable by everyone, particularly people with disabilities. This includes digital accessibility design across its desktop and mobile websites, making content compatible with assistive technologies, providing accurate and meaningful headings and labels, allowing text to be resized up to 200% without loss of information, offering clear and descriptive links, ensuring sufficient colour contrast, and more. Over the past decade, HTHKH has actively participated in and won Gold Awards in the Digital Accessibility Recognition Scheme, organised by the Hong Kong Internet Registration Corporation Limited and co-organised by the Digital Policy Office of the Government of Hong Kong SAR.

Wind Tre and **3** Austria promote digital inclusion by offering discounted plans for people with disabilities, supporting more accessible and affordable connectivity. In 2025, **3** Austria also started using inclusive language in digital campaign templates.

DRIVING INCLUSION THROUGH 5G AND VIRTUAL REALITY

Wind Tre is harnessing the power of 5G to promote social inclusion and improve the lives of people with disabilities. The high-speed and low-latency features of 5G enable immersive experiences and innovative assistive technologies that enhance autonomy and participation.

City4All is an initiative funded by the EU that uses virtual reality and AI to raise awareness among young people about disability. Through realistic virtual reality simulations, participants experience the challenges faced by individuals with visual, hearing, or motor impairments in everyday situations such as navigating a city to attend a concert. This approach fosters empathy and understanding of diversity and inclusion.

Wind Tre plays a key role as the technological partner of City4All. The company provides 5G connectivity and virtual reality equipment to ensure smooth and realistic experiences. Wind Tre experts also contribute technical and logistical support, measuring network performance and guaranteeing the quality of the immersive environment. This initiative reflects Wind Tre's sustainability strategy and demonstrates how technology can reduce barriers and promote digital accessibility and social participation.

ENVIRONMENTAL TRANSITION AND RESILIENCE

CKHGT supports the internationally-recognised goal of limiting global warming to below 1.5 degrees Celsius and is progressing its climate transition plan, towards its target to reach net-zero across the value chain by 2050. At the same time, CKHGT recognises the global challenge of unsustainable resource consumption and the significant issue of e-waste, including from used mobile devices. It offers products and business models that embed circularity principles to reduce the lifecycle impacts, including climate impacts, of device use.

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 Governance' section of this report. Specific roles and responsibilities related to climate strategy across CKHGT, are shown in figure 9. These include:

- The CKHH Sustainability Working Group, that provides oversight and strategic direction on climate change and includes Mr. Frank Sixt - CKHH Co-Managing Director and Finance Director, and on the Boards of both CKHH and CKHGT. The Head of Sustainability for CKHGT reports to the CKHH Sustainability Working Group on a quarterly basis.
- The CKHGT Policy Board, comprising CEOs of each business unit, as well as Mr. Frank Sixt, CKHH Co-Managing Director and Finance Director. The CKHGT Policy Board oversees key strategic projects and public reports and approved both CKHGT's near-term and net zero targets, as well as CKHGT's Sustainability Strategy. The Head of Sustainability for CKHGT reports to the CKHH Sustainability Working Group on a quarterly basis where key projects and initiatives require communication to, or approval by the Policy Board.
- The CKHGT Sustainability and Climate Change Network, comprising sustainability lead representatives from each business unit, and collaborating on climate change topics and progress. This Network meets on a quarterly basis with sustainability representatives briefing and seeking approval from their CEOs on GHG data submissions, target-setting, action plans and reporting, according to local requirements.

Climate CDP 2025 A-

CKHGT recognises the importance of comprehensive climate-related disclosures and reports annually to the CDP (formerly Carbon Disclosure Project). In 2025, CKHGT achieved a score of grade 'A-', an improvement from its score of 'B' in prior years.

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 2025 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 2025 recalculation and restatement are outlined on page 76 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.

In 2025, all business units integrated ESG-linked KPIs to short-term leadership remuneration incentives, which included targets related to scope 1 and 2 reductions, renewable electricity procurement, and actions to support a scope 3 reduction. These climate-related incentives comprised 4-5% of the overall short-term incentive for leadership in each business unit. For 2026, the ESG incentive framework is being revised and extended to include long-term incentives, and retaining the same climate-related KPIs within this framework.

FIGURE 9: 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 CKHH 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.

CLIMATE CHANGE STRATEGY

Climate-related risk and opportunity management

The CKHH Group Enterprise Risk Management framework is outlined in the 'Responsible and Resilient Business' chapter of this report. Climate change is included as a risk category to ensure that it is explicitly considered by business units as an integral part of risk management arrangements, with further guidance issued to business units in 2025 requiring assessment of material sustainability-related risks and opportunities, including climate-related risks and opportunities.

Alongside these standard processes, CKHGT has undertaken a staged process to deepen its understanding of climate-related risks and opportunities, including through scenario analysis.

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).

'NET-ZERO 2050' SCENARIO (ORDERLY)

'Net-Zero 2050' is an ambitious scenario that limits global warming to 1.5°C by 2100 through stringent and immediately introduced climate policies and innovation, reaching net-zero CO_2 emissions around 2050. It is linked to RCP 2.6 (estimated warming between 0.9°C – 2.3°C). This scenario is used to model transition risks.

'CURRENT POLICIES'

'Current Policies' assumes that only currently implemented policies are preserved. The world does not cut emissions and climate change accelerates causing 2.5°C of warming by 2050 and >4°C by 2100, bringing irreversible changes. It is linked to RCP 8.5 (estimated warming between 3.2°C – 5.4°C), involves little to no transition risks early on, but results in irreversible and globally disrupting physical risks. This scenario is used to model physical risks.

In 2025, CKHGT commenced a pilot project with HTHKH to refine the assessment of climate-related risks and opportunities, collect internal and external data, and model the financial effects of any potentially material risks and opportunities. The output aims to align with the Hong Kong Stock Exchanges and Clearing (HKEX) requirements for climate scenario analysis, which are aligned with the IFRS S2 standard from the ISSB. This project will be further progressed during 2026.

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		✓			✓	

Decarbonisation pathway

In 2022, CKHGT received approval of its near-term science-based GHG emissions reduction targets from the SBTi. These targets are consistent with the level of reduction required to keep global temperature rise to no more than 1.5°C.

In 2025, CKHGT resubmitted its baseline to SBTi to reflect the GHG base year recalculations undertaken over several previous years and received SBTi validation for its near-term targets based on this revised baseline. It also received its approval from SBTi for its target to reach net-zero GHG emissions across the value chain by 2050.

CKHGT CLIMATE TARGETS

CKHGT commits 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.

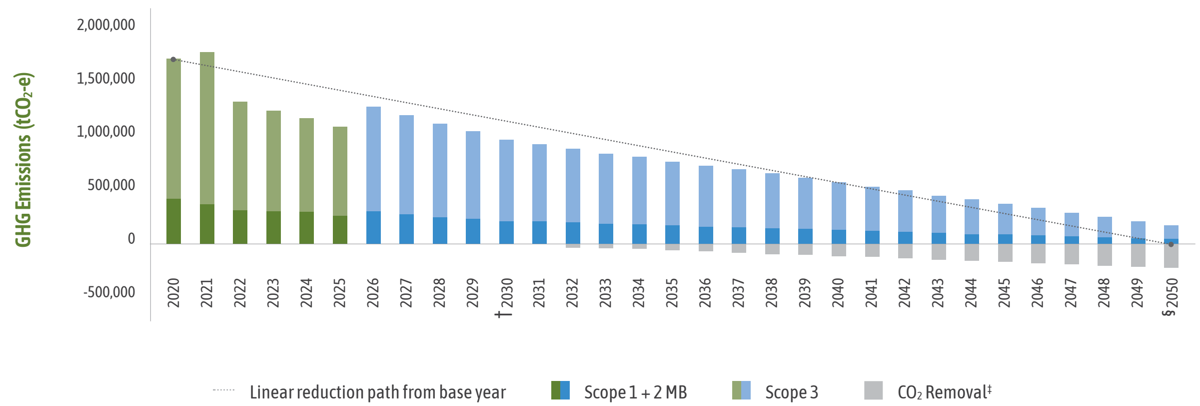
Reduce absolute scope 1 and 2 GHG emissions
90% by 2050 from a 2020 base year.

Reduce absolute scope 3 GHG emissions
90% within the same timeframe.

Reach **NET-ZERO** GHG emissions across the value chain by 2050.

CKHGT's decarbonisation pathway according to its near-term and long-term net zero targets is shown in figure 10, along with actual GHG performance from 2020 to 2025. This section also sets out the key decarbonisation levers that CKHGT is pursuing towards the achievement of its targets.

FIGURE 10: CKHGT'S DECARBONISATION PATHWAY



Data from 2020 to 2025 has been restated to reflect the VodafoneThree transaction (see page 76 for further details)
† Near-term science-based targets
‡ Long-term net-zero target
§ CKHGT will continue to monitor developments and align any future approach with the latest applicable SBTi guidance and requirements

CKHGT is currently on track to meet its SBTi-approved GHG emissions reduction targets

CKHGT DECARBONISATION LEVERS

CKGHT has identified the following 12 key decarbonisation levers:

RENEWABLE ELECTRICITY

- Purchasing of renewable electricity
- 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 to optimise networks and data centres

ENERGY EFFICIENCY IN CONTACT CENTRES AND OFFICES

- LED lighting and motion sensors
- Building management systems

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

RENEWABLE ELECTRICITY

Increasing the share of renewable electricity, supported with energy attribute certificates (EACs) in accordance with the requirements of the GHG Protocol, is a critical decarbonisation lever and a key element of CKHGT's climate transition plan. All business units are either already purchasing a significant proportion of renewable electricity or are actively monitoring and assessing opportunities to increase the share of purchased renewable electricity.

The availability and cost-effectiveness of renewable electricity vary 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. Furthermore, business units typically procure electricity both directly from energy suppliers, and indirectly, through arrangements with tower companies and landlords – presenting different opportunities and challenges for securing renewable electricity supported by EACs over the long-term.

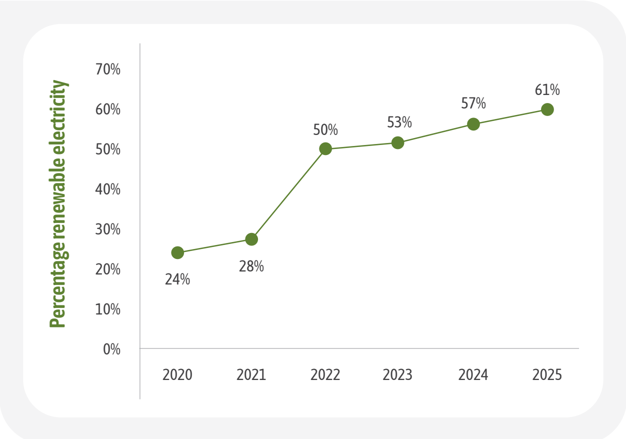
In 2025, CKHGT as a whole was supplied with 61% purchased renewable electricity, as compared to 57% in 2024[12]. **3** Ireland and **3** Austria maintained their supply of renewable electricity for all directly procured electricity, and **3** Denmark matched 100% of its electricity consumption with EACs from Danish wind and solar parks, for the fourth consecutive year. **3** Sweden purchased EACs covering 95% of its electricity consumption in 2025, up from 88% in 2024.

Wind Tre purchased EACs covering approximately 51% of its electricity consumption up from 47% in 2024 and is making steady progress towards its target of 100% renewable electricity by 2030. Also during the year, it worked to structure and negotiate its first power purchase agreement (PPA) for 10GWh of solar energy, generated in Italy. This PPA is expected to be finalised in 2026.

Wind Tre solar panels

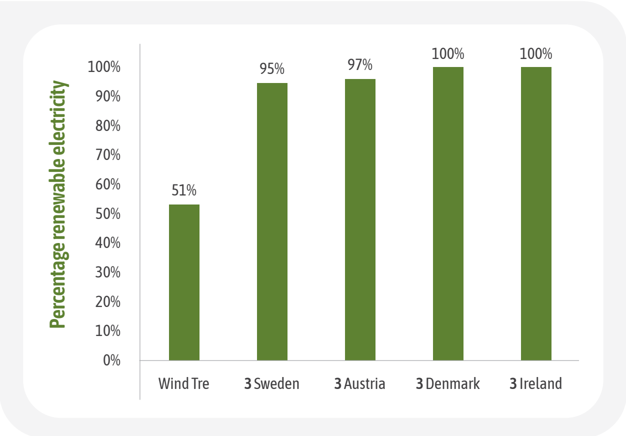
[12] Prior year data has been recalculated excluding **3** UK.

FIGURE 11: CKHGT RENEWABLE ELECTRICITY OVER TIME



*Data for all years has been restated to exclude **3** UK further to the VodafoneThree transaction*

FIGURE 12: CKHGT EUROPEAN BUSINESS UNITS - RENEWABLE ELECTRICITY 2025



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. In 2025, HTHKH installed a pilot solar energy project at one of its cell sites and there are places to further evaluate solar generation opportunities in the future. Over 1 GWh were self-generated from solar across Italy, Austria, Ireland and Hong Kong in 2025.

Solar powering a base station at Tullow Hill in Ireland

Rooftop solar in Austria

NETWORK ENERGY EFFICIENCY

Over a number of years, in the transition to 5G and 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.

Looking ahead, the impact of the rapid growth in AI adoption on the energy consumption of mobile network operators is uncertain. Research published by the GSMA suggests that AI-related traffic is not expected to be a primary driver of network energy demand over the next five years although there is a risk from long-term network capacity expansion. It also notes that AI solutions have the potential to reduce current network energy consumption by up to 30%, but that deployment and scaling are challenging[13].

[13] GSMA, '*Energy Implications of AI for Mobile Operators*'.

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. These efficiency gains are driven by a combination of advanced technologies and operational practices, outlined below:

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. By operating on a dedicated new core, 5G standalone manages network activity more efficiently, helping lower energy consumption per unit of data.

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. Running network functions as software rather than dedicated hardware allows more efficient use of computing resources, dynamic scaling of capacity, and consolidation of infrastructure. This evolution toward software-centric architectures can reduce core network energy consumption by 20% to 40%[14].

3. There is significant potential to use AI for real-time optimisation of the network. AI and advanced analytics can be deployed to optimise network performance in real-time, including dynamic sleep modes, traffic steering, and predictive capacity management. These capabilities can contribute to meaningful reductions in network power consumption. AI-driven optimisations can deliver up to 25% network energy savings[15].

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. Next-generation lithium-ion and hybrid battery systems provide higher energy density, longer lifecycle, and improved charge-efficiency, reducing backup power losses and site-level maintenance requirements. For example, lithium-ion batteries can achieve around 95% round-trip efficiency[16], charge up to three times faster, and last two to three times longer than conventional lead-acid batteries, while requiring only about one-third of the volume and weight[17].

5. 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.

6. 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. The decommissioning of legacy networks, particularly 3G, is an important aspect of overall energy efficiency.

5G-Advanced, currently being implemented across CKHGT networks, represents a significant evolution of the 5G system. It introduces more automated network management, improved spectral efficiency, and advanced resource allocation techniques, which are expected to deliver further energy performance improvements. Energy-saving features including cell sleep modes, adaptive antenna configurations, and conditional handovers are estimated to lower consumption by 15 to 30%[18]. 5G-Advanced also improves the measurement and collection of network energy consumption and defines energy efficiency KPIs, providing better visibility of energy use across network operations.

Looking ahead, 6G is expected to arrive during 2030 with network capabilities that will enable the promise of the cyber-physical world. 6G is designed to prioritise sustainability, aiming for net-zero energy consumption and prolonged device lifespans. Achieving end-to-end energy efficiency covering both the network and user devices is a key target, promising substantial energy savings compared to 5G.

[14] *Nokia, Nokia utilizes Intel technology to drive greater 5G network energy savings through software innovations and new chips #MWC24*.
[15] *RCR Wireless, How could AI be used to conserve telco energy consumption?*
[16] P Market Research, '*Global Communication Energy Storage Battery Pack Market Size, Share & Trends Analysis 2026-2032*'.
[17] ITU, '*White Paper on Lithium Batteries for Telecom Sites*'.
[18] 5G Americas, '*5G-Advanced Overview*'.

During 2025, 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, in collaboration with external partners, **3** Sweden initiated a pilot that introduces AI-based energy optimisation into RAN operations. The project analyses patterns of data traffic and identifies when 'capacity layers' (traffic bands or frequencies) can be safely switched off, reducing energy consumption while maintaining a high level of network performance and customer experience. Wind Tre continued to refine an AI-driven tool to dynamically redirect traffic so that certain equipment can be put into 'smart sleeping' mode, reducing overall energy consumption. HTHKH entered into a collaboration with Huawei International Co. Limited to enhance network operations, efficiency and customer experience through AI, big data and cloud transformation as outlined in '*Digital Solutions and Impact*' chapter of this report.

Furthermore, business units continued to implement and use free and passive cooling across base stations and other network sites where technically feasible. Free cooling uses external air, brought in by fans or other mechanical systems to cool the equipment whereas passive cooling typically uses site design and natural ventilation to reduce or avoid the need for any form of mechanical ventilation. Both approaches reduce electricity consumption and refrigerant use and can extend the lifecycle of air conditioners in use.

Further to its major upgrade and consolidation programme over multiple years, Wind Tre already uses free cooling across major network sites and data centres, with further transition ongoing. **3** Denmark is transitioning from free cooling to passive cooling across its network, with a more efficient site design that optimises air flow, reducing the fan power required for air circulation. The replacement programme is ongoing, with over 100 remaining installations.

In 2025, **3** Ireland installed free cooling capability at the Plassey, Limerick network and IT facility to support the relocation of a high-density network test environment. **3** Austria continued to 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. The possibility to further extend this trial will be evaluated considering energy efficiency and business continuity requirements.

HTHKH continues to enhance energy efficiency through the adoption of RAN energy-saving features including implementation of free cooling at selected base stations, and deployment of highly efficient all-weather equipment for new outdoor sites. During the reporting period, HTHKH completed the first phase of a cooling system optimisation programme, involving the rebalancing of refrigerant distribution to improve system efficiency and upgrading to more energy efficient chillers at network sites. Further cooling system upgrades will be implemented in phases over the coming years.

3 Sweden performed an energy audit with the assistance of an external energy consultant, which identified additional energy savings potential associated with the network's passive equipment (heating, cooling and ventilation), to be implemented during planned renovation of existing technical 'sheds'.

3 Denmark, **3** Sweden and **3** Austria have all achieved their target to decommission 3G capacity, further enabling the realisation of energy-savings following the deployment of next generation equipment.

ENERGY EFFICIENT NETWORKS IN SCANDINAVIA

3 Denmark and **3** Sweden have implemented a range of initiatives including the deployment of more efficient radio equipment and integrated antennas to reduce transmission and cooling power requirements, the introduction of higher-capacity, lower-energy baseband units optimised for LTE and 5G data traffic, and network configuration improvements, such as automatically placing cells into sleep mode during low-traffic periods, further reducing unnecessary energy use.

Mast in Denmark

3 Denmark is progressing further efficiency projects, including rollout of smaller local network sites and indoor solutions to reduce the load on larger sites and improve coverage with lower overall energy consumption, and replacement of legacy cooling systems with high-efficiency technologies alongside the decommissioning of the 3G network.

In 2025, **3** Sweden completed its decommissioning of 3G. A combination of all network energy saving measures has reduced energy consumption from 215 kWh / terabyte of data in 2021, to 131 kWh / terabyte in 2025.

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 2025, Wind Tre continued to build on this progress with the implementation of additional energy efficiency programmes, delivering overall savings of over 10 GWh per year. These included:

- Further consolidation of technology services and decommissioning of legacy equipment and sites;
- Internal energy audits focused on identifying opportunities for optimisation of infrastructure cooling systems and airflow management; and
- Infrastructure renewal with modernisation of refrigeration systems, uninterrupted power supply (UPS), and lighting systems.

DATA CENTRE ENERGY AND WATER SAVINGS IN 3 AUSTRIA

In 2025, **3** Austria completed its evaluation of the energy and water savings achieved through its 2024 replacement of data centre water cooling equipment with 'adiabatic coolers' (closed loop systems with high heat transfer efficiency). A water saving of more than 3,500m³ was demonstrated over the period 2022 to 2024, with water now solely used for air humidification at the cooling element, rather than proportionally to the heat requiring removal. Energy consumption decreased by 65% - the largest energy efficiency gain in the data centre area to date. Operational reliability has also significantly improved with the removal of biofilm-related deposits and corrosion, stabilising heat transfer and reducing unplanned maintenance interventions.

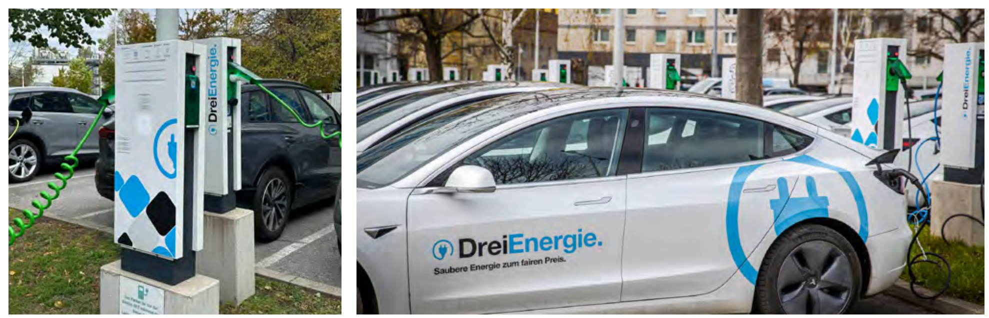
3 Austria cooling machine from partner STULZ

ENERGY EFFICIENCY IN CONTACT CENTRES AND OFFICES

CKHGT 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. Wind Tre also implemented a partial shutdown of air-conditioning and air-handling systems in non-operational areas during company closures. **3** Austria has installed energy management equipment at its head office, and in 2025, completed the upgrade of 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. In 2025, **3** Ireland continued to improve energy efficiency within its Dublin office through an ongoing project to replace existing lighting with LED technology. In addition, a lift refurbishment project commenced, aimed at reducing energy consumption and improving the overall efficiency of building operations.

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 2025, Wind Tre had converted 50% of its car fleet to electric or hybrid vehicles. **3** Sweden reached 88% of fleet as electric or hybrid, surpassing its target to have 70% electric or hybrid vehicles by 2025. **3** Ireland has converted 63% of its vehicle fleet to electric vehicles and continues to convert the fleet as leases are renewed. **3** Austria has converted over 50% of its fleet to electric vehicles and is aiming to convert to a fully electric vehicle fleet by 2030. **3** Austria also hosts one of the largest electric vehicle charging parks in the city of Vienna, enabling the simultaneous charging of 50 vehicles.



3 Austria hosts one of the largest electric vehicle charging parks in Vienna

Employee incentives to encourage more sustainable transport options have also been introduced. **3** Ireland offers 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.

SUPPLIER ENGAGEMENT

CKHGT views supplier engagement as a critical enabler of its climate strategy and a fundamental lever to achieve its science-based targets. As the majority of CKHGT's GHG emissions arise in the value chain, meaningful progress towards decarbonisation depends on structured, data-driven collaboration with suppliers.

Purchased goods and services and capital goods remain the most significant categories within CKHGT's Scope 3 footprint, accounting for the majority of value chain emissions. In response, CKHGT has implemented a structured Supplier Climate Engagement Programme delivered through collaboration between Sustainability and Procurement teams, and designed to improve data quality, strengthen decarbonisation alignment, and enable more accurate scope 3 GHG accounting.

Building on earlier engagement efforts, in 2025, CKHGT implemented a new engagement approach with a more targeted communication and information request sent to selected suppliers. Suppliers were prioritised based on their strategic importance to CKHGT businesses, CKHGT spend with the supplier, the carbon intensity of the supplier sector, and their maturity on climate change, allowing for prioritisation where impact and influence are greatest.

As part of this programme, CKHGT invited prioritised suppliers to a dedicated climate workshop. The session familiarised suppliers with CKHGT's climate ambition, scope 3 methodology, data requirements and decarbonisation expectations. It also clarified the role suppliers play in enabling CKHGT to meet its science-based targets and provided practical guidance on measurement, disclosure and target-setting.

The programme focuses on:

- Collecting supplier-specific scope 1, 2 and 3 emissions data.
- Understanding and tracking supplier decarbonisation targets.
- Supporting suppliers in measuring, disclosing and setting science-based targets.
- Integrating validated supplier data directly into CKHGT's scope 3 emissions model.

This targeted approach enables CKHGT to move beyond industry-average emission factors and progressively replace them with supplier-specific data, improving the precision, credibility and responsiveness of its scope 3 reporting and reduction pathway.

Device purchases contribute approximately 20% of CKHGT's scope 3 GHG footprint and remain one of the most material emission sources within purchased goods and services. In 2025, CKHGT continued engaging directly with handset manufacturers to expand the availability of model-specific lifecycle analysis (LCA) data, increasing overall coverage by approximately 7% compared to the prior year.

MULTI-SERVICE CONVERGENCE WITH LOW CARBON ENERGY PRODUCTS

During the reporting year, leveraging experience gained since 2021 through its partnership with Acea Energia, a leading Italian energy company specialising in the development of renewable energy projects, Wind Tre prepared for the 2026 launch of a new energy business – WINDTRE LUCE & GAS S.r.l. Through this business, Wind Tre aims to play a leading role in the Italian energy landscape, offering a distinctive commercial proposition based on multi-service convergence with transparent and environmentally responsible energy solutions.

All electricity supplied by WINDTRE LUCE & GAS will be renewable and certified with Guarantees of Origin. GHG emissions related to gas will be offset through the purchase of 'Gold Standard'- certified carbon credits, supporting environmental and social projects that benefit local communities. Furthermore, all WINDTRE LUCE & GAS billing will be in digital format, reducing paper waste and GHG emissions related to printing and delivery.

Climate adaptation

The physical impacts from climate change present 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 risk management framework, business units are investing in enhancements to protect assets, operations and human capital from extreme weather impacts.

For example, recognising the risk of power outages following extreme weather events, **3** Ireland is extending its battery backup on 365 mobile network sites, with 75 sites completed by the end of 2025.

HTHKH is deploying cloud-native intelligence infrastructure in partnership with Huawei International Co. Limited, that will use predictive capabilities to strengthen network resilience and recovery capacity, building on existing procedures and monitoring capabilities.

AI-DRIVEN PREDICTIVE CAPABILITIES TO SUPPORT NETWORK RESILIENCE AND RECOVERY

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

Additionally, as outlined in the '*Digital Solutions and Impact*' chapter of this report. HTHKH signed an MOU with Huawei International Co. Limited in 2025 to deploy cloud-native intelligent infrastructure. This infrastructure not only enhances network efficiency but also uses AI for prediction, improving urban resilience and recovery capacity in the event of extreme weather events or unforeseen incidents. This enables HTHKH to respond rapidly during extreme weather events, demonstrating the opportunity to leverage cutting-edge technology to address climate change impacts and ensure business continuity.

Wind Tre aims to continuously improve the resilience of its telecommunications network investing in improvements to air conditioning units within the RAN supporting effective operation in temperatures up to 46°C. In 2025, further to operational issues experienced in Rome during a period of high-temperature, heat-reflective paint was applied to plant surfaces to provide greater protection during extreme heat events.

The nature and significance of physical risks vary across operating markets, based on the different changes in climate hazards that are expected to occur across different geographies in a high-warming scenario. In future years, business units will aim to assess these physical risks at a more granular level supporting more targeted action for climate resilience.

Industry engagement

CKHGT collaborates through the GSMA as an active member of its Climate Action Taskforce, participating in working groups on topics where it can make a contribution to collective progress across the sector. During 2025, it participated in a GSMA initiative to develop Climate Transition Planning Guidance for Telecommunications Companies, covering key elements of transition planning such as decarbonisation levers, governance and implementation frameworks. It also actively contributed to the development of the GSMA Scope 3 Assessment tool, which aims to simplify GHG emissions accounting for network operators.

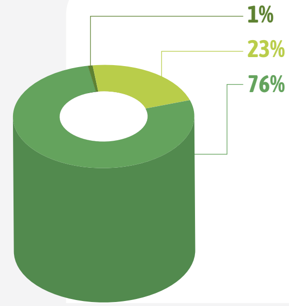
CLIMATE METRICS AND PERFORMANCE

GSMA Intelligence estimates that the telecommunications industry accounts for around 1% of energy use worldwide[19]. Data traffic globally is forecast to nearly triple by 2030 compared to 2024 levels[20], driven by several factors including increased connections, improved device capabilities, an increase in data-intensive content and continued improvements in the performance of deployed networks. Developments in generative AI may further drive mobile traffic growth beyond baseline predictions.

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 2019-2023, while global internet traffic nearly quadrupled, combined scope 1 and 2 emissions fell by 8%[21]. CKHGT aims to mirror this decoupling effect through its own investments and performance.

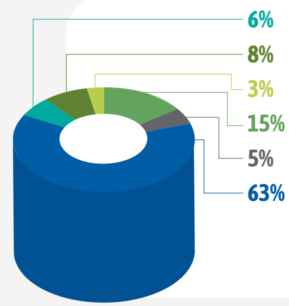
CKHGT's 2025 value chain carbon footprint (scope 1, 2 and 3) is shown in figure 13. It has been prepared in accordance with the GHG Protocol. KPMG LLP was engaged to undertake independent limited assurance, reporting to CKHGT, using the assurance standards ISAE (U.K.) 3000 and ISAE 3410, for the selected GHG emissions that have been highlighted with an *. KPMG LLP's full statement is available on page 109 of this report. Detailed information on the reporting methodology can be found in the CKHGT Greenhouse Gas Reporting Criteria 2025 published on the CKHGT website. Indirect emissions (scope 3) are responsible for 76% of CKHGT's total value chain GHG emissions. Indirect electricity emissions (scope 2) are responsible for 23% (using market-based measurement) while 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 14) in line with the different sizes of their networks and customer base, with Wind Tre naturally being the largest contributor (63%).

FIGURE 13: CKHGT'S 2025 VALUE CHAIN CARBON FOOTPRINT (tCO_2-e)



Scope 1*	12,479	1%
Scope 2 (market-based)*	244,214	23%
Scope 3*	808,099	76%
Total	**1,064,792**	

FIGURE 14: CKHGT'S 2025 GHG FOOTPRINT (SCOPES 1, 2 (MARKET-BASED) AND SCOPE 3) BY BUSINESS UNIT (tCO_2-e)



3 Austria	85,116	8%
3 Denmark	29,341	3%
HTHKH	165,725	15%
3 Ireland	57,363	5%
Wind Tre	666,232	63%
3 Sweden	61,015	6%
Total	**1,064,792**	

[19] GSMA Intelligence, 'True north: a guide to green network evolution'.
[20] Ericsson, 'Mobile Report'.
[21] GSMA:, 'Mobile Net Zero 2025: State of the Industry on Climate Action'.

GHG EMISSIONS RECALCULATION

CKHGT regularly reviews and updates its GHG footprint to maintain accuracy and alignment with both internal policies and international standards. It 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. It may also, on a voluntary basis, recalculate and restate GHG data from the baseline and / or subsequent years when a change occurs that results in a change in reported data of below the abovementioned 5% threshold for combined scope 1 and 2, or scope 3 data. This is in accordance with its recalculation policy as outlined in the CKHGT Greenhouse Gas Reporting Criteria 2025.

During 2025, there was a recalculation of CKHGT's baseline for two events:

1. As outlined in the 'Reporting scope' section of this report, on 31 May 2025, a merger was completed between **3** UK and Vodafone UK, creating VodafoneThree, in which CKHGT retained a 49% interest. Further, on 30 July 2026, CKHGT fully disposed of its remaining 49% interest in VodafoneThree. The effect of the VodafoneThree scope 1 and 2 emissions (based on 49% share) which would have been included in the CKHGT scope 3 GHG category 15 (investments) footprint is immaterial and would not impact decision-making by users of the CKHGT Sustainability Report. On this basis the GHG emissions of **3** UK have been fully removed from the CKHGT footprint for 2025 and no GHG emissions from VodafoneThree have been included in scope 3. In accordance with CKHGT base year recalculation policy, as outlined in the CKHGT Greenhouse Gas Reporting Criteria 2025, the base year of 2020 has been recalculated to the same effect, excluding all **3** UK emissions. Intervening years have also been recalculated using the same approach.

2. **3** Ireland identified that electricity consumption at third-party sites within its RAN had been incorrectly classified as being from renewable sources during the base year 2020 and reviewed electricity sourcing arrangements for those sites to confirm the correct classification of electricity consumption. Where electricity consumption could not be confirmed as renewable, **3** Ireland reclassified the electricity consumption from renewable sources to non-renewable sources, applying the residual mix emissions factor for the base year 2020. As a result of the review, 3% of **3** Ireland's overall electricity consumption was reclassified as being from non-renewable sources. **3** Ireland performed a voluntary recalculation of its scope 2 market-based GHG emissions for the base year to reflect this reclassification. For CKHGT overall this change increased the baseline scope 2 market-based emissions from 405,927 tCO_2e to 407,316 tCO_2e (an increase of 0.34%). There were no adjustments made to scope 2 market-based emissions for subsequent years as the impact was assessed as being immaterial.

These amendments in combination resulted in a decrease of 4% of the scope 1 and 2 market-based baseline total, primarily driven by the VodafoneThree recalculation, and a decrease of 26% of scope 3 baseline total fully attributable to the VodafoneThree transaction. A similar change was reflected in subsequent reporting years. Further detail is provided in the CKHGT Greenhouse Gas Reporting Criteria 2025. 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[1]	CKHGT 2020 recalculated
Scope 1	tCO_2-e	18,188	16,334
Scope 2 – market-based	tCO_2-e	424,458	407,316
Scope 2 – location-based	tCO_2-e	441,663	361,662
Scope 3 - Total	tCO_2-e	1,692,851	1,248,077
Scope 3 – category 1: purchased goods and services	tCO_2-e	845,667	635,349
Scope 3 – category 2: capital goods	tCO_2-e	562,756	388,054
Scope 3 – category 3: fuel- and energy-related activities	tCO_2-e	120,320	85,655
Scope 3 – category 4: upstream transportation and distribution	tCO_2-e	11,895	7,151
Scope 3 – category 5: waste generated in operations	tCO_2-e	346	319
Scope 3 – category 6: business travel	tCO_2-e	920	608
Scope 3 – category 7: employee commuting	tCO_2-e	8,481	6,392
Scope 3 – category 8: upstream leased assets	tCO_2-e	34,496	34,496
Scope 3 – category 9: downstream transportation and distribution	tCO_2-e	0	0
Scope 3 – category 10: processing of sold products	tCO_2-e	0	0
Scope 3 – category 11: use of sold products (Direct)	tCO_2-e	55,169	37,997
Scope 3 – category 12: end-of-life treatment of sold products	tCO_2-e	2,074	1,352
Scope 3 – category 13: downstream leased assets	tCO_2-e	0	0
Scope 3 – category 14: franchises	tCO_2-e	6,812	6,789
Scope 3 – category 15: investments	tCO_2-e	43,915	43,915
Total GHG emissions (scopes 1, 2 and 3)[2]	tCO_2-e	2,135,497	1,671,727
Total GHG emissions intensity (scopes 1, 2 and 3)[2]	tCO_2-e/revenue HK$'000	0.024	0.025
Total GHG emissions intensity (scope 1 and 2)[2]	tCO_2-e/revenue HK$'000	0.004	0.006

CKHGT 2020 GHG emissions have been recalculated to retrospectively reflect the VodafoneThree transaction and update of Ireland's electricity emissions calculations.

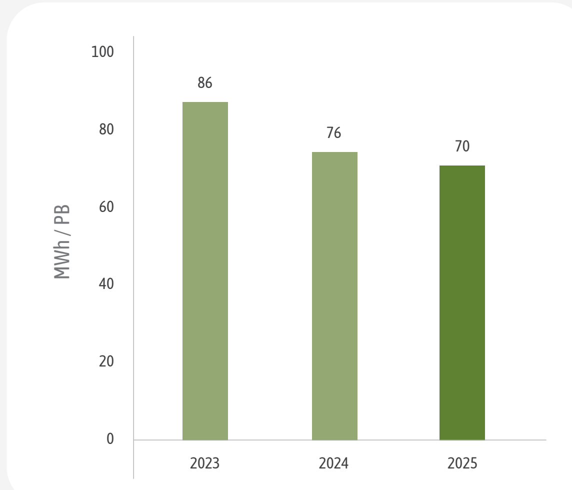
1 Previously published in the CKHGT Sustainability Report 2024.
2 Using scope 2 market-based emissions.

Total scope 1 and 2 emissions decreased in 2025 by 14% as compared to the restated 2024 and reduced by 39% as compared to the restated 2020 baseline GHG footprint, ahead of a linear path towards CKHGT's scope 1 and 2 near-term science-based target. The year-on-year reduction reflected an increase in the proportion of electricity supported with EACs, and a decrease in the 'residual mix' emissions factor for Italy – CKHGT's largest operating market.

Importantly, the energy intensity of networks continued to decrease (figure 15), reflecting investments that have increased the overall energy efficiency of CKHGT networks.

A full discussion of renewable energy procurement trends is provided in the section 'Renewable electricity' page 68.

FIGURE 15: NETWORK ENERGY INTENSITY[1]



1 Network energy intensity is based on recalculated energy consumption and data traffic values, as part of recalculations as described on page 76.

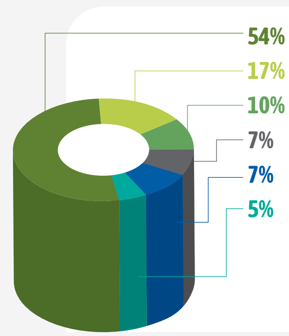
The key contributors to CKHGT's scope 3 carbon footprint (figure 16) were purchased goods and services and capital goods (71%). This year CKHGT continued to extend its 'hybrid' approach to the calculation of 'spend-based' GHG emissions (i.e. emissions associated with capital and operational expenditure 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 2025, over 16% of spend-related emissions were attributed to individual suppliers, representing a significant improvement in the quality and traceability of reported data. Prior-year emissions were not recalculated due to limitations in the availability of historical supplier emissions data.

CKHGT's scope 3 emissions in 2025 decreased by 6% versus 2024 and 35% as compared to the 2020 baseline, largely attributed to changes in underlying spend, while supplier-specific emission factors applied within the hybrid methodology also indicated a reduction in emissions intensity over time, with assessed suppliers generally reporting year-on-year decreases of around 5%, and certain suppliers exceeding reductions of 10%.

Emissions from devices also decreased by 7% in 2025 compared to the previous year, despite a 4% increase in overall device volumes. This reduction is primarily driven by continued improvements in supplier performance and increased transparency through increased availability of LCA factors across device models. CKHGT further expanded its use of LCA data, with over 80% of handset emissions now calculated using product-specific information (up from approximately 75% in 2024). Across the full device portfolio, including routers, modems and tablets, the share of product-specific data remains above 70%. This improved coverage allows CKHGT to more accurately reflect reductions achieved by suppliers at device level, resulting in a 12% decrease in emissions associated with purchased devices (scope 3 category 1). In addition, emissions from the use phase of devices (scope 3 category 11) decreased by 10%, primarily reflecting lower location-based electricity emission factors applied across key markets.

CKHGT continues to strengthen engagement with its suppliers to further expand the availability and quality of product-specific emissions data, while promoting ongoing reductions in lifecycle emissions across the device portfolio.

FIGURE 16: CKHGT'S 2025 SCOPE 3 CARBON FOOTPRINT (tCO_2-e)



Category 1: Purchased goods and services	437,839	54%
Category 2: Capital goods	133,982	17%
Category 3: Fuel- and energy- related activities	84,068	10%
Category 11: Use of sold products	55,332	7%
Category 15: Investments	57,526	7%
Other categories	39,352	5%
Total	**808,099**	

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

ENABLING CIRCULARITY OF DEVICES AND NETWORKS

The ubiquitous use of mobile phones and routers across the world, with 9 billion smartphones[22] 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[23] 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, including partnerships for circular management of network waste.

End-of-life product stewardship

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%[22].

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 is expected to grow from 315 million units in 2025 to 430 million units by 2030, with a forecast compound annual growth rate (CAGR) of 6.4% over the period 2025-2030[24].

Device take-back and trade-in

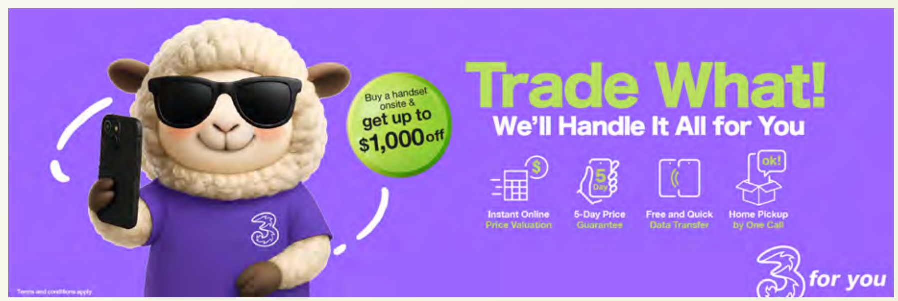
All of CKHGT's major markets have device take-back or trade-in arrangements in place, with HTHKH refreshing its trade-in programme with a new partner during the reporting period. Schemes typically include incentives such as money back towards a new device or a discount on subscription payments. A number of the programmes take-back devices originally sold by any retailer. 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.

For example, **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 reused devices was 93% in 2025, with the remaining 7% recycled. **3** Ireland offers a trade-in model allowing 'on-the-spot valuation' and in-store returns, in exchange for new technology, and is planning to develop its offer further with advanced trade-in features and circular device options in the future. Wind Tre has offered its 'Reload exChange' trade-in service since 2022, offering cash or a discount on new technology, in partnership with third-party Bolttech Device Protection.

Wind Tre offers Reload ExChange

HTHKH LAUNCHES HANDSET TRADE-IN AND RECYCLING PROGRAMME

In 2025, HTHKH launched a new handset trade-in programme named 'Trade What! We'll handle it all for you'. The programme provides instant online recycling price valuation for devices and free customer support for transfer of data from the old to new device, enabling customers to access and use a recycling service with greater ease and transparency. Third-party recycling partners provide convenient home pickup services to further reduce barriers for customers who wish to recycle their devices.



Business units also support the responsible recycling of devices that have no residual value and cannot be repaired or refurbished. For example, in line with local legal requirements, **3** Sweden introduced a new in-store arrangement in 2025 for accepting used devices and batteries that are broken or have no residual value, supporting responsible disposal. Nationwide coverage is targeted by mid-2026. **3** Ireland provides customers with dedicated contact support to arrange collection of devices with no residual value, as well as access to authorised Waste Electrical and Electronic Equipment (WEEE) return facilities, ensuring convenient and compliant end-of-life management of electronic equipment.

[22] GSMA, '*Strategy Paper for Circular Economy: Mobile Devices*'.
[23] GSMA, '*Strategy Paper for Circular Economy: Network Equipment*'.
[24] GII, '*Used And Refurbished Smartphone - Market Share Analysis, Industry Trends & Statistics, Growth Forecasts (2026 - 2031)*'.

Extending the life of devices in use

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.

Business units also offer support to customers to help extend the lifetime of products in use. For example, **3** Sweden provides 'how-to' guides and video tutorials on software updates, battery care, and usage tips that prolong device life, alongside directions to repair pathways, and repair discount offers for customers subscribing to the 'Good Environmental Choice' mobile plan. **3** Ireland also provides tutorials by device on its website. All European business units are preparing for the EU 'Right to Repair' Directive, which introduces a range of obligations on manufacturers, sellers and repair service providers to enable or incentivise repairs. This will involve further changes to consumer information and communications both in-store and online, including modifications to sales and after-sales processes.

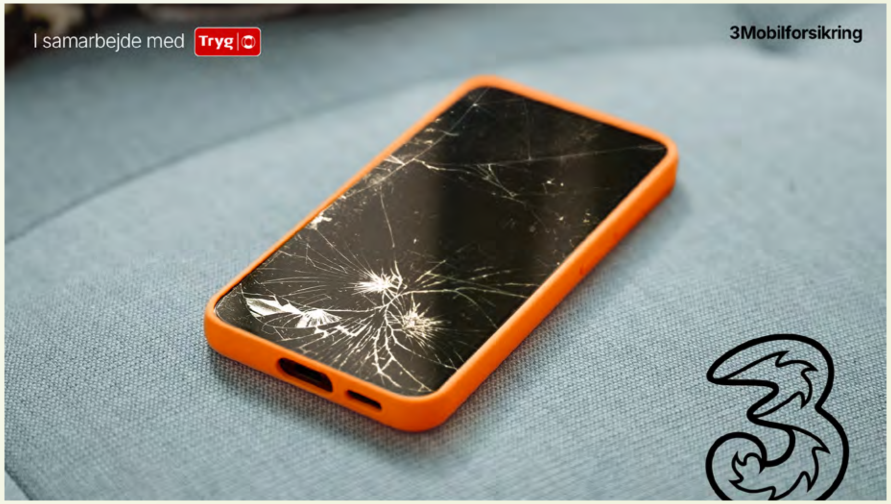
In 2025, **3** Denmark launched a new insurance offer, making it easier for customers to repair their devices, or to replace faulty devices with refurbished alternatives where repairs are not possible. **3** Austria also partners with third-party Bolttech, offering customers mobile phone insurance which covers repairs.

POST-SALES SERVICE AT WIND TRE EXTENDS THE PRODUCT LIFECYCLE

Wind Tre offers a comprehensive range of device post-sales services aiming to support customers through the entire lifetime of their devices. These include warranty and out-of-warranty repairs, replacement of faulty devices for fixed line services, and device protection solutions. The aim of these offers is to improve customer satisfaction with options for customers to reuse and repair their products, and to extend the customer device lifecycle. Devices no longer reusable are recycled, and the raw materials are recovered by specialised companies. In 2025, 22,582 modems and 4,077 business customer smartphones, were refurbished.

FLEXIBLE DEVICE INSURANCE SUPPORTING LONGER PRODUCT LIFECYCLES WITH 3 DENMARK

In 2025, **3** Denmark, in collaboration with Tryg Affinity, launched a new mobile and tablet insurance solution, 3Mobilforsikring, designed to provide greater flexibility and support longer device lifecycles. Unlike traditional device-specific insurance, the new offering covers the device in which the customer's SIM card is inserted, including used phones and tablets, making it easier for customers to switch devices or continue using older ones without losing coverage. The insurance allows customers to choose repair or replacement with a refurbished device in the event of damage, offers unlimited claims, and provides optional theft protection. By enabling coverage across multiple devices and encouraging the continued use of existing equipment, the solution helps reduce premature device replacement and supports more sustainable consumption practices.



3 Denmark device repair and replacement solution

REPAIR AND REPLACEMENT OPTIONS FOR WIND TRE CUSTOMERS

In 2025, Wind Tre expanded its circular economy offering with the launch of 'Reload Forever', a flexible service designed to extend the usable life of smartphones through repair and replacement options without requiring device instalment plans. Available to both new and existing customers, including those using devices purchased outside Wind Tre, the service enables customers to repair smartphones using original parts or replace them when necessary, including with refurbished Grade A devices. By allowing continued use, repair and refurbishment of smartphones rather than premature replacement, 'Reload Forever' supports reduced electronic waste, promotes more sustainable consumption patterns, and enhances customer access to reliable devices through flexible, subscription-based protection delivered in partnership with third-party Bolttech Device Protection.

Wind Tre's 'Reload Forever' offer

Circular products

Refurbished devices offer customers a more cost effective and sustainable alternative to new devices, increasing their total lifetime in use and therefore lowering the overall GHG and environmental impact of devices. In 2025, **3** Austria launched a new refurbished devices offer, joining **3** Sweden and Wind Tre products launched in previous years, and meeting the growing demand in this segment.

A number of business units also offer more sustainable models of device ownership such as device leasing. In 2025, **3** Austria launched a new device leasing product 'HandyFreiheit' ('Mobile Phone Freedom'). Wind Tre's sub-brand VERY mobile partnered with Anitia, enabling customers to access a range of reconditioned products with a 12-month warranty. Moreover, through its partnership with Subbyx, VERY launched the option of rental plans for refurbished devices further expanding the ways in which customers can take-up a refurbished device offer.

In addition, 33% of all modems returned to Wind Tre by customers due to malfunction are replaced with pre-owned devices that have been refurbished by specialised companies. This approach enables fixed network customers to receive fully functional products while significantly reducing the generation of electronic waste. **3** Austria offers refurbished smartphones, tablets and wearables at a store Vienna, with regular sales promotions held during 2025.

3 Sweden continued its circularity service '3Leasing', a 'device-as-a-service' model offered 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.

'HANDYFREIHEIT' FOR AFFORDABLE AND SUSTAINABLE SMARTPHONES

Smartphone use in Austria is rising, and high-end devices are becoming essential for many customers. Many consumers spend increasing amounts on new phones, while old devices sit unused despite growing interest in refurbished models. To address this, **3** Austria has launched 'Handyfreiheit' or 'Mobile Phone Freedom', a new offer that makes premium smartphones more affordable and promotes sustainability.

With this initiative. customers only pay the difference between the price of a device and its resale value, lowering monthly costs and enabling upgrades after 12 months or free exchanges after 24 months. If the phone is kept for longer, the monthly price drops automatically. Returned devices are refurbished and resold, supporting the circular economy.

This initiative ensures access to cutting-edge technology while reducing waste and making smartphones more cost-effective for consumers.

***3** Austria 'Mobile Freedom' offering for customers*

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. For example, **3** Ireland, **3** Denmark and **3** Sweden offer a range of sustainable mobile accessories made of recycled plastic materials, or through 100% carbon neutral production. **3** Denmark offers 'Panzer Glass Matrix' on-screen protection for the Samsung S24 family, made from 100% recycled plastic.

To support customers in making sustainable choices and in compliance with the extended EU Energy Labelling Regulation, all European business units provide device energy labelling both online and in-store. This labelling informs consumers about key product attributes including energy rating, battery life, and repairability to support more informed purchasing decisions. In addition, **3** Sweden offers 'Good Environmental Choice' ('Bra Miljöval') labelled mobile subscriptions, providing customers with lower environmental impact service options and supporting more sustainable consumption choices.

The 'SIM', or 'subscriber identity module', is also an 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 sourced innovative SIM products with a smaller 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. In HTHKH, most SIM cards are issued without packaging, and printed with QR codes linked to online information, thereby reducing paper.

The eSIM is increasingly becoming the primary method of service activation for mobile phones, wearable accessories and other connected devices. An eSIM enables the delivery of a digital profile to a chip on the device without a physical SIM card, giving more flexibility and choice to customers while reducing plastic, emissions and electronic waste.

Throughout 2025, CKHGT business units continued to invest in enhancements to eSIM infrastructure and sales platforms, enabling a smoother and more digital customer experience for eSIM activation, 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 offers the fully digital, eSIM-only mobile subscription 'up', which was rebranded from up3 in 2025. The service is supported by an AI-based chatbot, 'Uppi', launched in 2025, which enhances customer service by providing continuous support in 80 languages. Available 24/7, Uppi delivers fast, personalised and context-aware responses, helping to reduce waiting times and improve customer satisfaction.

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 an established process for dismantling and documenting both router components and core network equipment in a dedicated warehouse management system. RAN equipment parts are assessed for potential reuse and returned to storage when suitable. Components that can no longer be reused are responsibly handled, with materials send to certified recycling companies for proper recovery. **3** Ireland, **3** Austria, **3** Sweden and Wind Tre all achieved 100% reuse and recycling of network waste, working with external partners.

Business units are increasingly implementing programmes for the replacement of lead-acid batteries, traditionally used for back-up power across networks, with lithium-ion batteries. Lithium-ion batteries have longer lifespans, higher energy charge / discharge efficiency and require less maintenance, reducing resource consumption and reducing lifecycle impacts overall. For example, **3** Ireland progressed its replacement programme in the reporting year with recycling of all lead-acid batteries removed, and WINDTRE is planning its replacement programme to start from the second half of 2026. **3** Sweden is replacing batteries as part of planned maintenance with 300 sites scheduled. Since 2023, HTHKH has participated in the Green Friends initiative, led by Hong Kong Battery Recycling Centre Limited, and in 2025 achieved its target to recycle 100% of the lead-acid batteries disposed of in its Hong Kong operations.

Reducing waste in business operations

The reduction of waste and diversion of waste from landfill to more sustainable waste management methods, is also a priority in non-network business operations. This includes a focus on sustainable logistics, measures to reduce paper-based documentation, and improved waste segregation.

Wind Tre continues its 'zero paper' initiative to reduce paper consumption across its retail operations by digitising customer administrative communications, including invoices, through the Doxee platform. Based on a 2025 survey, this initiative is estimated to deliver nearly 38 million digital communications per year, saving approximately 451 tonnes of paper and saving approximately 1,250 tonnes GHG emissions per year.

3 Sweden has switched to using PEFC-certified paper across all offices, stores, and invoicing, in line with the Nordic Eco Label (Svanen).

HTHKH has integrated circular economy principles into its business operations, with a target to achieve 35% recycling of general office waste by 2030, and range of recycling and waste reduction initiatives launched during the reporting period. Its efforts have been recognised by the 'Good Level Energywi$e' Certificate and 'Excellent Level Wastewi$e Certificate' from the Hong Kong Green Organisation Certification.

SUSTAINABLE AND DIGITAL LOGISTICS IN 3 AUSTRIA

3 Austria is committed to operating low carbon, digital 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. It uses a filling material made from recycled paper that is suitable for onward recycling and has optimised processes to reduce parcel volumes. It deploys recycled and reusable packaging for transportation of radio access network equipment. **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.

3 Austria has developed a comprehensive 'Handbook for the Responsible Handling of Electronic Waste' to strengthen sustainable practices within its own operations. The handbook outlines the internal processes, from device return and refurbishment to recycling, helping to extend product lifecycles and minimise electronic waste.

Measuring the GHG impact of circularity initiatives

CKHGT continued to apply lifecycle-based methodologies to assess the GHG reduction benefit associated with circularity initiatives. CKHGT is actively involved in the GSMA Circular Economy for Mobile Devices working group and its calculation approach for refurbished devices is aligned with industry practice as outlined in a whitepaper published through this working group.

Emissions factors for refurbished devices are leveraged from LCA calculations conducted by ADEME, the French Agency for Ecological Transition[25], according to the ISO 14040:2006 standard. This analysis replaces emissions from the device lifecycle stages of raw materials and manufacturing of new devices, with those related to parts replacement only. It also reflects 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 a refurbished device is 88% lower on average, than if a new device had been sold.

For measurement of GHG emissions from its physical SIM portfolio, CKHGT applied LCA emissions factors sourced in 2024 from its main SIM supplier, which vary by SIM card type, material and manufacturing location. While CKHGT increased the sale of SIMs produced from recycled refrigerators as a share of its SIM portfolio from 42% to 62% year-on-year, there was more limited availability of data on production location requiring an assumption that a greater share of SIMs were produced at a more distant location (i.e. requiring further transportation).

For measurement of GHG emissions from eSIMs, CKHGT leverages a publicly available emissions factor based on an LCA methodology allowing the lifecycle stages to be properly covered, and indicates a 97% lower emissions footprint as compared to a standard physical SIM[26]. In 2025, the share of eSIMs in the overall SIM portfolio increased to 27% as compared to 19% in 2024, and overall eSIM volumes increased by 43% year-on-year.

Reflecting these changes, emissions associated with SIM portfolio overall declined by 3% year-on-year (following a recalculation of 2024 SIM-related emissions to exclude **3** UK), and demonstrated an estimated 50% lower emissions footprint if compared to reference physical SIMs.

The combined effect of all these circularity initiatives applied to devices, SIMs and eSIMs has led to a reduction of 152 tCO_2-e in 2025 compared to the volume of emissions that could be expected to have occurred through sale of new phones and reference physical SIMs.

[25] ADEME, '*Assessment of the environmental impact of a set of refurbished products*'.
[26] Giesecke Devrient, '*Eco-friendly eSIM*'.

BIODIVERSITY AND WATER

Water and biodiversity are essential to the stability and resilience of the natural systems on which societies, economies and critical infrastructure depend. Across many sectors of the economy, activities and value chains can interact with land, water and ecosystems, creating both environmental impacts and dependencies that warrant careful management. Ongoing biodiversity loss and increasing water stress—exacerbated by climate change—are contributing to heightened physical risks, including drought, flooding and ecosystem degradation, with potential implications for long-term resilience. In parallel, evolving regulatory and disclosure expectations are driving greater transparency around how organisations understand, assess and respond to nature- and water-related risks and opportunities.

Biodiversity

The CKHH Biodiversity Policy, which applies to CKHGT as a subsidiary, sets out a CKHH Group-wide commitment to complying with or exceeding statutory requirements relevant to biodiversity in the markets where the Group operates. It aims to manage its direct biodiversity-related impacts through protecting natural resources, minimising the impact of business activities, and enhancing awareness and engagement.

A number of business units are reflecting these expectations into local level policy. In 2025, Wind Tre issued an Environmental Policy covering biodiversity and nature. **3** Austria is in the process of developing a local Sustainability Policy that will encompass biodiversity. HTHKH has had a Biodiversity Policy in place since 2024.

Business units also apply local nature protection requirements to new infrastructure developments. For example, in **3** Sweden and **3** Austria, new sites are subject to regulatory approval by environmental and nature conservation authorities, with assessments covering potential impacts on habitats and ecosystems, including protected areas.

Biodiversity was assessed as a non-material topic in the double materiality analysis conducted in preparation for reporting according to the CSRD.

Water

In 2024, CDP included water as a mandatory module for telecommunications organisations. Water was assessed as a non-material topic in the double materiality analysis conducted for reporting according to the CSRD. CKHGT's operational water consumption remains very low with a water consumption intensity of 0.00003m^3/revenue HK$'000 in 2025.

However, CKHGT recognises the relevance of water consumption in certain parts of the telecommunications value chain, such as third-party data centres and semi-conductor manufacturing.

CKH IOD has developed a tool for mapping locations to areas of biodiversity and water stress using internationally recognised frameworks and databases such as WRI Aqueduct, the IUCN, and the Natura 2000 network, aligning with the 'locate' phase of the LEAP framework defined by the Taskforce on Nature-related Financial Disclosures (TNFD).

In 2025, CKHGT received a score of 'B-' on its water disclosure, reflecting actions taken to understand and report on water-related risks and impacts.

In 2025, no fines, enforcement orders or other penalties for water-related regulatory violations were received by CKHGT business units.

WORKFORCE CAPABILITY AND COMMUNITIES

CKHGT is an employer of more than 13,000 people. It aims to attract and retain an engaged and diverse workforce, with the skills required to support business needs in the context of technological advancement and changing competitive environment. It has comprehensive strategies in place across its markets to achieve workplace excellence and leading employee propositions, tailored to local circumstances. It also uses its resources and capabilities to support the needs of the communities in which it operates.

Each business unit operates within the robust framework of CKHH policies, including the CKHH Code of Conduct. In 2025, business units continued to invest in the employee experience, receiving recognition across all markets.

Employer of choice: workplace-related recognition and certifications achieved in 2025

3 SWEDEN

- Top 10 'Sweden's Best Workplaces' by Great Place to Work® for 12th year in a row.
- 'One of Europe's best workplaces' by Great Place to Work®.
- 'Career Company 2026' by independent organisation Karriärföretagen for 13th year in a row.
- 'The most attractive workplace in tech selected by women' by independent organisation Karriärföretagen for the 2nd year.
- Winner of Grand Prix – 'Employer brand of the year' by the Magnet Awards.
- Bronze for 'Campaign of the year' in the Magnet Awards.
- Silver in the PR Competition Spinn Award in the 'Employer Branding' category.

3 DENMARK

- 'Apprenticeship of the Year' by the Roskilde Technical School.

WIND TRE

- 'Top Employer Italy' 2025 for the 8th consecutive year, recognised by the Top Employer Institute for its excellence in the development and wellbeing of people.
- 'Diversity Leader' in Europe 2025 by Statista and the Financial Times for its inclusive business practices.
- Europe's Best 100 Employers for Women 2025/26 by the Statista and the Corriere della Sera.
- Italy's Best Employer 2026 by the Corriere della Sera and Statista.
- UNI/PdR 125 Certification – a national certification that promotes and protects diversity and equal opportunities in the workplace.

3 IRELAND

- The only telecommunications provider in Ireland to achieve the Investors in Diversity Gold Mark for 2023-2025 awarded by the Irish Centre for Diversity.
- Shortlisted for the Diversity and Inclusion Award at the CIPD Awards.
- Ranked 17th in the Irish Independent Best Employers list.
- Ranked 6th in the Irish Independent Tech Industry list.

HTHKH

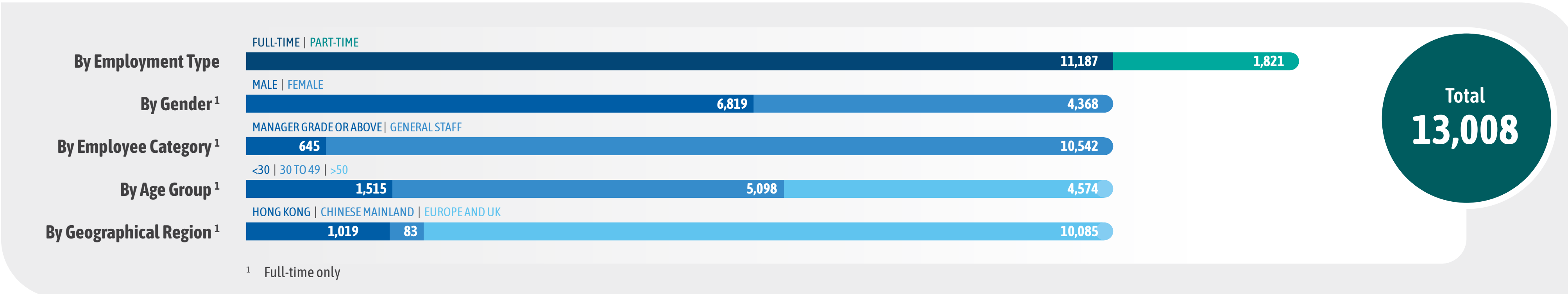
- 'Good Mandatory Provident Fund (MPF) Employer', 'e-Contribution Award' and 'MPF Support Award' under Good MPF Employer Award organised by the MPF Schemes Authority.
- '20 Years Plus Caring Company and Caregiver-Friendly Company' under the Caring Company Scheme, organised by The Hong Kong Council of Social Services.

3 AUSTRIA

- 'Work and family' renewed certification by the Federal Ministry of Women, recognising **3** Austria as a 'family-friendly employer'.
- 'Top company seal' from Kununu for the fourth 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.

TALENT ATTRACTION AND RETENTION

FIGURE 17: NUMBER OF EMPLOYEES



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. It also provides comprehensive employee benefits that go beyond statutory requirements in some areas and maintains a dedicated focus on measures to support employee 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

CKHGT businesses value employee feedback to support the ongoing enhancement of the employee proposition, and the attraction and retention of people with the capabilities required for business success.

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.

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 over 70% in 2025 confirming positive feedback on aspects such as personal fulfilment, inclusion and a business strategy that inspires confidence.

3 Denmark continued its quarterly employee satisfaction survey and held feedback sessions and workshops to address areas identified for improvement. Similarly, **3** Sweden conducted its quarterly employee surveys and held regular follow-up meetings.

Employee engagement surveys are complemented with ad hoc surveys on individual topics. For example, during the year, HTHKH conducted surveys on operational enhancements and canteen services. Alongside formal engagement surveys, all business units engage employees through multiple channels such as 'Town Hall' meetings, employee fora or resource groups, and internal newsletters. For example, 3 Ireland has an Employee Forum comprising representatives from across the business, providing a structured route for employees to share feedback with senior leadership. The Employee Forum meets quarterly with the Chief of Staff and other senior leaders to share feedback, monitor action plans, and ensure that the employee voice is heard when making key decisions. HTHKH has created an internal communications channel, 'JoMeh', to share employee activities, corporate updates, sustainability initiatives and information on employee benefits.

Talent attraction

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

CROSS-BORDER RECRUITMENT IN 3 AUSTRIA

In 2025, **3** Austria continued 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 a 6-month internship supporting graduates and undergraduates as they transition into the workforce. The programme, now in its 10th year, includes experience across multiple business functions, supported by structured onboarding, skills-building activities and mentoring. It concludes with a Graduation Day for feedback and reflection. In 2025, 48 new graduates participated, with 12 subsequently recruited. Wind Tre also offers the New Generation Programme for recent graduates in collaboration with not-for profit organisation Telethon, focused on personal and professional growth, and the Future Leaders programme in partnership with universities.

HTHKH ENGAGING YOUNG PEOPLE ON CAREERS IN 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 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 offers the 3Talent trainee programme, designed for recent master's graduates aiming to rapidly advance in the telecommunications industry. This year-long programme provides insight into **3** Sweden's business model and culture, with hands-on experience in the Strategy and Business Development team, where trainees act 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.

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. It offers a Customer Excellence Programme (CXP), with a certification programme for all CXP graduates, and a dedicated wellbeing programme for customer service employees. Enhancements to the programme have included greater flexibility in working hours, more autonomy, a clear pathway for competence and career development, and greater involvement in decisions related to the organisation of the customer service function. Since the launch of the programme, employee engagement has risen and tenure of customer services employees has increased by more than 100%.

The 3Academy in **3** 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 seeks 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.

3 Ireland and Trinity College Dublin also continued their successful STEM scholarship partnership. Since the start of the program, 25 scholarships for women in STEM have been funded, as well as two Trinity Access Teacher Fellows as part of the Trinity Access Pathways to STEM Programme. 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. In addition, **3** Ireland offers an apprenticeship programme in conjunction with external provider Fast Track into Information Technology (FIT) which focuses on cyber security and technology skills.

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.

HTHKH participated for the seventh consecutive year in the 'Business-School Partnership Programme' organised by the Hong Kong General Chamber of Commerce. This programme aims to bridge the gap between Hong Kong's business community and secondary schools, offering students invaluable insights into the corporate world, equipping them with the knowledge and skills needed to navigate their careers.

HTHKH participating in the Business-School Partnership Programme

3 IRELAND'S GRADUATE PROGRAMME

3 Ireland's graduate recruitment strategy prioritises learnability and diversity, recognising that long-term success depends on graduates' ability to learn, adapt and apply new knowledge. Rather than focusing solely on technical skills, it identifies candidates with strong problem-solving ability, curiosity and learning agility. This is embedded in the interview process, where candidates complete an online escape room to assess how they learn and apply new knowledge in real time, alongside questions exploring how they have used learning to overcome challenges. Diversity across skills, perspectives and academic backgrounds strengthens innovation, collaboration and decision-making.

Recruitment is supported by a structured network, including a grad buddy, mentor, Early Careers community and a graduate alumni network, providing peer support, knowledge sharing and ongoing development.

Together, these elements ensure the programme selects and supports adaptable, inclusive graduates ready to thrive in a fast-paced organisation.

Employee benefits

Business units offer competitive benefits, going beyond legal requirements in many areas to support a leading employee proposition and provide appropriate support to employees. This includes paid parental leave for both parents, hybrid and flexible working options, and support of caregiving activities through the promotion of targeted welfare initiatives.

Business units have taken tailored approaches to reflect local needs. For example, **3** Denmark offers equal weeks of paid parental leave regardless of gender. In **3** Sweden, employees benefit from a wellness allowance alongside travel support, including a company car programme, bicycle leasing and a subsidised annual public transport pass. **3** Austria provides public transport tickets, an affordable canteen, a mobile phone and subsidised childcare at its Vienna headquarters.

HTHKH supports employee wellbeing through comprehensive benefit packages, including medical insurance with online general practitioner consultations, access to additional panel doctors, preferential dental plans, pension schemes, shopping discounts, shuttle bus services and free staff SIM plans. To further promote work-life balance, HTHKH has enhanced leave entitlements and provides maternity leave and benefits that exceed statutory requirements.

3 Ireland provides access to its Employee Accessibility Hub, launched in 2024. It offers a 'Moments that Matter' initiative to ensure employees and managers feel supported during the key life moments that matter most to them, including parenthood, menopause and life transitions. Employees also benefit from hybrid working, company days, life insurance, a subsidised canteen and a cycle-to-work scheme supporting sustainable commuting.

Wind Tre's approach combines flexibility, wellbeing and family support. Through its Time 4 Me initiative, employees can access part-time and flexible working arrangements, including temporary options, leave periods and tailored support for shift workers. Wellbeing provisions include healthcare through the Wind Tre Solidarity Fund, supplementary hospitalisation cover for non-executive staff, health cover for executives, insurance and accident policies, and fitness classes offered both in person and online.

Wind Tre also provides guidance and consulting services to help employees identify personalised solutions for home care and administrative needs, alongside e-learning courses covering topics such as stress management, first aid, nutrition, bullying prevention, addictions and emotional wellbeing. In 2025, family and education support was further strengthened through expanded school fee reimbursements, book and supplies vouchers, Summer Campus tuition refunds, and the enhanced #Schoolreward programme, increasing access to tutoring services and discounted educational materials.

HTHKH Employee Wellness Experience Day

Employee wellbeing

CKHGT recognises that supportive and inclusive policies and practices are essential for maintaining an engaged and resilient workforce, supporting the attraction and retention of talent and a thriving workplace overall. Business units have a range of programmes in place to support their employees' mental, physical, and financial wellbeing according to the needs in local markets.

A number of business units have dedicated support for mental health. For example, **3** Ireland has Mental Health First Aider Training available for colleagues, as well as in-person Mental Health Skills for Managers training to further embed and support employee wellbeing, with over 90 managers trained. It collaborates with charity partner Aware to raise awareness about mental health support. **3** Austria has an occupational psychologist available for all employees at its headquarters in Vienna and offers three hours of free coaching service for all employees every year. There are also mental health training sessions held twice a year, and e-learning modules on stress avoidance, resilience, nutrition, physical activity, and more. **3** Sweden provides employees with anonymous access to individual support on aspects of mental wellbeing such as managing stress, as well as personal issues such as divorce or financial difficulty.

Taking a holistic approach to supporting employee physical, mental and social health, **3** Sweden offers the 3Health Hub – a dedicated platform through which employees can participate in a wide range of wellbeing activities such as training, seminars and health assessments. **3** Sweden promotes active lifestyles through guided gym sessions and provides access to a comprehensive external support service offering confidential assistance on psychological, legal, financial, and personal matters.

Complementing its offer of comprehensive medical benefits, HTHKH periodically offers health assessments, talks and workshops, encouraging proactive health management and informed choices. During the reporting year, HTHKH launched an in-house First Aid Ambassador Programme, held an Employee Wellness Experience Day and organised occupational health and safety talks.

In 2025, linked to its inclusion and belonging approach and as described under 'Employee benefits', **3** Ireland continued its 'Moments that Matter' portal, with policies and support available for employees and managers during key life moments including parenthood, menopause and life transitions.

EMPLOYEE WELLBEING IN 3 IRELAND

Wellbeing is a key pillar of the **3** Ireland's Inclusion and Belonging Strategy, encompassing mental, physical, social and financial wellbeing, and enabling employees to thrive in the dynamic and evolving workplace.

Mental wellbeing is supported through its Employee Assistance Programme providing confidential counselling, parent and career coaching, access to Headspace for guided meditation, and a strong network of Mental Health First Aiders (MHFA). It offers a Moments That Matter portal with policies and support initiatives available for employees during key life events.

Physical wellbeing initiatives include a Digital Doctor service, a 'cycle to work scheme', access to 'Peppy' - the workforce menopause support service, and flexible virtual exercise classes accessible via partner platforms.

Social wellbeing is fostered through an active Diversity, Inclusion and Belonging Committee, regular inclusion and belonging events, employee sports and social clubs, and charity partnership activities.

Financial wellbeing is promoted through personalised financial education via the Nudge app, exclusive employee discounts through the Three Plus platform, and a comprehensive range of financial benefits.

MENTAL AND PHYSICAL WELLBEING AT WIND TRE

Wind Tre has introduced a range of initiatives to enhance employee mental and physical wellbeing.

Mentel wellbeing services include a professional and confidential online psychological counselling service, Welfare ComeTe, for employees and their family members, a social-welfare service Al Tuo Fianco, connecting employees and their families with health experts and the LianeCare platform connecting employees with professional domestic service providers.

Physical wellbeing services include the Doomore Wind Tre programme with online pilates and yoga sessions, a national partnership with WellHub providing access to over 2,100 fitness facilities, and the availability of changing rooms at the Rome office to encourage physical activity during the working day.

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. All business units have a local Code of Conduct aligned with the CKHH Group Code of Conduct. supporting a respectful and non-discriminatory workplace.

These policies are supported with procedures and practices within business units to help prevent discrimination from occurring, including within recruitment and performance management, and to take appropriate action on any incidents of discrimination (see the 'Whistleblowing' section within the 'Responsible and Resilient Business' chapter of this report.

Diversity and inclusion leadership

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

Dedicated steering committees or working groups with executive sponsorship are in place to oversee inclusion and diversity, and dedicated senior staff members or teams have responsibility for driving progress – often the Head of Human Resources or a diversity specialist within the Human Resources team.

For example, **3** Ireland's Diversity, Inclusion and Belonging (DIB) Committee, together with the executive sponsorship and alignment with the people propositions team oversees ambitious strategies and commitments for advancement in this area.

DIVERSITY, INCLUSION AND BELONGING AT 3 IRELAND

3 Ireland continues to progress its award-winning Inclusion and Belonging Strategy and action plan, overseen by its DIB Committee and its executive leadership team, to foster an ambitious, inclusive and engaging culture for all. In 2025, the DIB Committee hosted several inclusion events including: International Women's Day, Ramadan, Eid, Global Accessibility Awareness Day, Pride, South Asian Heritage Month, Black History Month, World Menopause Day and International Day of Persons with Disabilities.

Moreover, in 2025, **3** Ireland became a signatory of Business in the Community Ireland's 'Elevate Pledge', committing to concrete actions that advance equality, diversity, and inclusion within the workplace.

In addition, **3** Ireland has implemented a mandatory DIB training module for all employees. Through the company's Coursera learning platform, employees also have access to a broad range of specialised DIB courses developed by 50 industry partners.

3 Ireland's DIB Committee

In 2025, HTHKH established a Workforce Diversity Policy to support its commitment to fostering a diverse and inclusive working environment where individual differences are respected and all employees are treated with dignity. It also reinforced its inclusion strategy by conducting a 'Hiring with Diversity' seminar for management-level employees. In addition, the Sustainability Committee monitors progress in embedding the principles of diversity and inclusion across the organisation.

Wind Tre has a dedicated Diversity and Inclusion Manager with responsibility for defining and driving implementation of the strategy.

Employee resource groups and inclusion initiatives

Business units have active programmes in place to create inclusive workplaces and continuously enhance workplace practices and communications to drive greater inclusivity.

They implement 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** Austria has a 'DREIversity' community of engaged employees from different departments, with events during the year celebrating diversity and standing against discrimination. In 2025, **3** Ireland launched 'Women@Three', which aims to connect and support women across the business, holding events and fundraising for Breast Cancer Ireland during its first year.

Wind Tre maintains an employee resource group focused on the LGBTQ+ community, with a dedicated intranet space, and partnership with an external not-for-profit to promote strategies and practices for LGBTQ+ inclusion. Wind Tre additionally places a focus on disability inclusion within the workforce, offering an internal 'Disability Hub' as well dedicated support for employees facing disability-related challenges.

In 2025, Wind Tre also internally launched its 'Human Language Manifesto' – co-created with the involvement of more than 300 employees, setting out the values of a respectful working environment and the responsibilities of each individual regarding the use of inclusive language.

Gender equality

The gender balance across CKHGT remained stable at 61% male and 39% female for the fourth consecutive year. This reflects the nature of CKHGT as a technology-based business, and fewer women overall in senior leadership positions.

To redress this imbalance, CKHGT aims to achieve gender balance with a minimum of 40% women in management in the longer-term, supported by individual business unit targets, linked to leadership long-term incentives. At a local level, **3** Ireland has established a 50:50 gender balance target for leadership roles, while **3** Sweden is targeting a 60:40 (male to female) ratio in every department, at all management levels, and across the entire organisation by 2028. **3** Austria has a target to achieve gender balance in the long-term. **3** Denmark aims for at least 40% representation of each gender in management positions by 2032. Wind Tre is targeting a 50:50 balance for all internal promotions, linked for several years to leadership remuneration.

To support the achievement of gender balance targets, business units have developed and implemented action plans, involving the development of policies and management systems, targeted communications and recruitment campaigns for women, changes to recruitment processes to reduce bias, and leadership development programmes for women.

For example, Wind Tre has developed a Gender Equality Policy, a Parenting and Caregiving Policy, and a steering committee to oversee the implementation of its Gender Equality Strategic Plan. It has maintained its UNI/PdR 125:2022 gender equality certification from IMQ S.p.A., accredited by Accredia, for its gender equality management system, reflecting Wind Tre's structured and measurable approach to fostering an inclusive and equitable work environment. Also in 2025, Wind Tre launched the 'Alliance for Balance' programme to further strengthen gender equality and inclusive leadership across the organisation. Targeting 100 senior executives, the initiative raises awareness, builds leadership capability, and reinforces the company's long-term commitment to gender balance.

In **3** Ireland, job descriptions are assessed and aligned with gender neutral best practice principles and gender balance is tracked through all stages of the application process, with candidates actively sourced to meet a 50:50 gender balance where possible, and anonymised screening of CVs. All hiring managers are trained on unconscious bias, and recruitment teams are trained on disability inclusion. All promotion and development pathways use predefined, job-related competency frameworks and role-levelling guides, to avoid decisions being made based on subjective, non-job-related factors. All promotion decisions are calibrated with multiple leaders to reduce single-leader bias and ensure consistency across the organisation. Employees have multiple confidential channels to report concerns about discrimination or inequitable treatment, and all reports are investigated promptly.

3 Denmark requires that candidates from the underrepresented gender are always included in shortlists for leadership positions and offers competitive paternity or co-parental leave schemes to promote a more equal distribution of caregiving responsibilities. In 2025, **3** Denmark adopted a new Gender Balance and Diversity Policy and updated its Whistleblower Policy, and Code of Conduct and Ethical Guidelines for Employees, to further support gender diversity.

EQUAL OPPORTUNITIES AT 3 SWEDEN

3 Sweden has implemented a range of initiatives into its recruitment processes to prevent discrimination from occurring and ensuring that applicants have access to a competency-based and fair application process.

It advertises all open positions, creating an equal opportunity for all employees to apply, and to be evaluated through a competency-based selection process. In 2025, **3** Sweden strengthened its commitment to competence-based recruitment by implementing a new Applicant Tracking System and an assessment tool to ensure objective, skills-focused evaluations. It also introduced a candidate experience tool to collect feedback and measure satisfaction throughout the recruitment process. **3** Sweden also aims for every recruitment process to include at least one female finalist candidate.

All leaders must complete an e-learning module on unconscious bias and inclusive recruitment practices, ensuring fair and consistent decision-making. These initiatives, combined with a strong focus on employee wellbeing, contributed to improved retention of new hires.

In 2025, HTHKH established a Workforce Diversity Policy, which upholds the principle of equal opportunities in recruitment, promotion and all conditions of employment. HTHKH also organised a 'Hiring with Diversity' seminar, highlighting the significance of diversity and inclusion in the hiring process and providing important guidance for managerial staff to support HTHKH's commitment to diverse and inclusive recruitment.

RE-CERTIFICATION OF 3 AUSTRIA AS A FAMILY-FRIENDLY EMPLOYER

In 2025, **3** Austria successfully completed the recertification of the 'Work and Family' quality seal and defined further measures, such as improved communication and organisational processes for employees on parental leave. With this certification, **3** Austria underscores its commitment to a family-conscious approach that supports the balance between work and personal life.

Gender pay gap reporting

Certain CKHGT operating markets have now had gender pay gap legislation in place for several years. For example, in Ireland, the Gender Pay Gap Information Act 2021 requires organisations over 250 employees to report on key metrics including their mean and median gender pay gaps. Across the EU, legislative requirements are expanding with the introduction of the EU Pay Transparency Directive, which came into effect in June 2026. This Directive will mandate gender pay gap reporting and adjustment of unjustified differences, providing greater transparency in pay and equal pay for equal work or work of equal value.

CKHGT welcomes the legislation on mandatory gender pay gap reporting and is actively working to ensure full compliance with the new EU Directive. It is supportive of actions that can be taken across its businesses to ensure gender pay equality.

3 Ireland has reported on its Gender Pay Gap since 2022. **3** Ireland's mean gender pay gap as of June 2025 was at 16.7% for 2025, which marked an improvement of 8.5 percentage points in comparison to 2024 (25.2%). Its pay gap continues to be influenced by two key drivers: the distribution of women and men working in the organisation and the seniority at which they work, as well as wider technology sector talent challenges. It has action plans in place to reduce gaps, with a focus on gender balance in recruitment, providing leadership development and mentoring to support the talent pipeline for technical and specialist roles, and maintaining early careers recruitment efforts through its Connect to STEM programme with Trinity College Dublin.

3 Sweden conducts annual salary reviews to identify unexplained pay gaps between women and men and to make adjustments where appropriate, supported by salary policy, structures and review principles. **3** Denmark is in the process of mapping all employee salaries to identify any adjustments that may be necessary to ensure equal pay for comparable positions.

Wind Tre previously maintained an externally-verified equal pay certification for three consecutive years, now replaced with its broader UNIPdR 125:2022 certification, which has equal pay as one of the core pillars.

EMPLOYEE CAPABILITIES

CKHGT business units continue to evolve their workforce capabilities and structures, with programmes in place across business units to address local business needs. 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

As telecommunications networks become more virtualised and automated with the roll-out of 5G, along with the increased use of cloud computing and the unprecedented growth in AI, skills needs of telecommunication companies are shifting toward areas such as software, data analytics and cyber security.

At the same time, in the context of rapid technological change, strong market competition – including from 'digital-first' companies, and high customer expectations, businesses increasingly need to be agile in their structures and operations, allowing for quicker decision-making and adaptation to change.

In this context, business units are constantly reviewing their structures and critical skills needs, investing in programmes to ensure their workforce is 'future-ready'.

AGILE WORKING IN 3 IRELAND

In 2025, **3** Ireland introduced a significant change to the operating model of the business with the introduction of 'Agile'. The agile model, pioneered in technology teams but now spreading across whole organisations, replaces the traditional hierarchy with cross-functional groups focused on outcomes.

To support this change, **3** Ireland has upskilled over half the workforce in agile ways of working, putting innovation, iteration, facilitation, critical thinking and digitalisation at the forefront of how the business works. These skills are future-focused, creating an agile and adaptive workforce that is able to drive value and pivot at speed within roles.

3 Ireland aims to embed a culture of continuous learning through structured upskilling and reskilling initiatives that support both business transformation and individual career growth. In addition to its significant programme of training to support its transition to an 'agile' organisation, **3** Ireland offers an online learning academy, and access to over 20,000 courses and professional certifications with globally-recognised provider 'Coursera', providing 'on-demand' development content across a wide range of topics and career levels. It also provides access to dedicated tech-skills learning platforms such as INE (Internetwork Expert) and Pluralsight, and has launched a new AI learning module to enhance digital literacy and prepare its workforce for the next wave of technological change.

3 Denmark takes a structured approach to upskilling and reskilling, with all employees having a 12-month development and training plan tailored to their role and future career path. In 2025, 114 employees participated in the 3Academy 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 3Academy courses.

In 2025, **3** Sweden launched a company-wide competence strategy to ensure the organisation is future-ready and equipped with the capabilities required to deliver on its long-term business ambitions. This strategy introduced a core skills framework focused on leadership, sales and service, culture, business acumen and ways of working, providing a common foundation for how the organisation grows, leads and creates value. In parallel, each business area is defining business-specific competencies aligned to strategic priorities and future needs. This transformation is supported by a new learning platform offering structured learning journeys linked to the core skill areas, alongside a broad portfolio of competence development programmes including Customer Excellence, Leadership Basics, Project Management, Personal Development, and development programmes for informal leaders.

HTHKH is strengthening workforce capability through targeted AI and analytics training, complemented by structured job rotation and job enrichment initiatives. These programmes enable employees to develop new skills, gain cross-business experience, and support continuous upskilling and reskilling across the organisation. Moreover, to encourage employees to further pursue professional development, advance their skills in emerging areas, stay updated with industry developments and obtain professional credentials, HTHKH provides subsidies for recognised training programmes as well as reimbursement for selected licence and examination fees.

As outlined in the 'Responsible and Resilient Business' chapter of this report, all business units now offer AI training, with several business units developing and launching new and updated AI training during the year. **3** Sweden implemented mandatory training for employees and released an AI-Hub with tools and guides to assist with practical uses. **3** Ireland implemented AI general awareness and literacy training for the whole organisation, and applied AI for certain roles, with an expanded 'AI Academy' due for launch in 2026. **3** Denmark released an enhanced version of its Responsible Use of AI module. **3** Austria worked on the development of its 'FutureLab' training for selected employees, for launch in 2026, focusing on the development of future-oriented soft skills and technology skills, complementing existing AI training offered to all employees.

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 and delivered more than 230,000 training hours for its employees in 2025.

It supports young professionals entering the workforce through the 'New Generation Programme' – a structured development journey combining corporate values, core soft-skills training, and mentoring to accelerate personal growth, enhance leadership capabilities, and deliver a distinctive employee experience.

Additionally in 2025, it continued its strong focus on the development of AI skills, launching seven e-learning modules focused on strengthening data-related skills, such as data management, data analytics and data driven innovation, and embracing innovation as a strategic driver for the future.

Performance management and employee development

All employees receive a performance review at least annually, promoting systematic feedback between line managers and team members, supporting people development, and recognising achievements. These typically include discussion of an individual's career and development plan, including objectives for the upcoming year, and any skills and development needs.

For example, **3** Sweden conducts performance reviews for all employees twice a year, with a new online dashboard implemented in 2025 to better track the completion of reviews. **3** Denmark conducts performance reviews twice yearly for employees in functions with the highest turnover to improve retention and support employees.

At HTHKH, all employees participate in an annual internal performance appraisal through which they receive formal feedback on their strengths as well as areas for improvement. Additionally, direct managers work collaboratively with employees to set meaningful goals, creating a roadmap for success and personal development. This approach fosters two-way communications across different job levels and cultivates an environment where transparency, continuous improvement and development are central to everyone.

Investing in leaders

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

3 Sweden identifies and develops future leaders through its performance development model, which assesses leadership potential through regular talent reviews and development discussions. High-potential employees are recognised and provided with new challenges and growth opportunities. Leadership capability is further strengthened through the 'Take Lead' programme, a structured development journey for selected employees preparing for future leadership roles, as well as the 'Level Up' coaching programme, which accelerates individual growth and career readiness.

3 Denmark invests in the development of future leaders through structured and targeted talent programmes. These include leadership courses for assistant store managers, equipping them with the skills and experience needed to assume full store management responsibilities.

In 2025, Wind Tre continued to support the development of high-potential employees and strengthen its future leadership pipeline through the 'Future Leaders' framework and launched a new wave of 'Jump & Stretch' programme participants, developed for young talents in collaboration with prestigious institutions such as Luiss and Bocconi universities.

3 Austria annually offers a leadership programme for team leads and senior management, with modules on leadership, self-awareness and change. Managers in stores also benefit from a tailored leadership development programme.

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.

DEVELOPING LEADERS AT 3 IRELAND

3 Ireland offers a range of programmes to support leadership development:

- 'Manager Essentials' is a practical training programme for those new to management, covering a range of topics such as process requirements, difficult conversations, best hiring practice and getting the most from teams.
- 'Amplify' is a six-month development journey for those who wish to build enhanced leadership capabilities upon fundamentals already acquired.
- The 'Agile Leadership Academy' provides leadership development support to all leadership roles within agile pathways through technical training, practical application, coaching and team management principles to improve skills and unlock performance across the business. It focuses on building adaptive, inclusive, and purpose-driven leaders, and embedding 'servant leadership' as the foundation of effective team management. The Phenomenal Teams Programme is also available for leaders and their teams to support ongoing high performance.
- The 'Aspiring Leader Programme' in retail and service supports the development of future leaders, ensuring long-term organisational impact and integrity-driven performance.

Sustainability training and engagement

During the reporting year, CKHGT's commitment to sustainability training and engagement with employees was significantly expanded across its business units.

3 Denmark launched its mandatory, annual ESG and sustainability courses for all employees, while **3** Sweden embedded sustainability into its annual Code of Conduct training, and developed a new pre-boarding programme including sustainability educational content.

Wind Tre introduced new environmental and social sustainability training, including two dedicated e-learning courses covering climate change, biodiversity, ecological transition and sustainability principles, and continued to publish its company-wide sustainability newsletter. It held an internal sustainability roadshow along with a series of employee workshops contributing to the development of its new Sustainability Plan and allowing people at all levels to help actively shape the company's ESG agenda.

3 Ireland further strengthened its approach with the continued roll-out of a mandatory digital sustainability module delivered annually and included in onboarding for all new employees. HTHKH incorporated sustainability into its annual mandatory policy training for all staff. Meanwhile, **3** Austria continued to advance engagement through company-wide sustainability initiatives, including its Annual Sustainability Week, and is planning to launch new sustainability training for employees in 2026.

Together, these initiatives reflect CKHGT's ongoing commitment to continuous learning and employee engagement on sustainability across its operations.

SUPPORTING COMMUNITIES

Business units all have active programmes of community support tailored to the needs of their local market and the interests of their workforce – engaging their workforce through teamwork and collective impact while enhancing community wellbeing and resilience across a range of areas. This support is additional to dedicated digital inclusion programmes, as outlined in the chapter on 'Digital Solutions and Impact'.

Since 2020, **3** Ireland has partnered with Aware, a nationwide mental health charity which provides free support, education and information services to people impacted by anxiety, bipolar disorder and mood-related conditions. **3** Ireland publicises Aware's campaigns through its social media and other communication channels and employees engage in fundraising events.

3 Ireland supports education initiatives through partnerships with Business in the Community's World of Work programme, the North-East Inner City work experience programme, and the Trinity College Scholarship programme for women in STEM. Through its involvement in the Schools Business Partnership World of Work programme, employee volunteers also help students from disadvantaged Dublin schools gain insight into the working environment. **3** Denmark supports local communities with 'Coding Class', a course for primary school children, introducing coding and encouraging creativity with technology.

In 2025, HTHKH provided immediate and extended support to the victims of the Tai Po fire in Hong Kong. In addition, HTHKH started collaborating with Gingko House as a new canteen provider. Gingko House is a non-governmental organisation which aims to support the elderly by providing employment opportunities in restaurant operations, enabling them to regain confidence, dignity and self-reliance.

3 Ireland fundraising charity walk for Aware

HTHKH supporting elderly employment with Gingko House

HTHKH HELPING VICTIMS OF THE TAI PO FIRE IN HONG KONG

In November 2025, a fire rampaged Tai Po Wang Fuk Court in Hong Kong. HTHKH immediately extended the opening hours of 3Shops in Tai Po and provided complimentary rentals for backup phones, 5G broadband routers, SIM cards and portable chargers. Service fees were subsequently waived, with extra local data provided to help affected residents stay connected.

HTHKH also extended support by deploying a 5G broadband network to the temporary housing at the local Chinese YMCA Wu Kai Sha Youth Village and schools in Tai Po. Moreover, HTHKH provided a free SIM service to The Law Society of Hong Kong and offered free Multimedia Messaging Services (MMS) to NGOs for disseminating mental health-related messages and support information to customers.

HTHKH employees supporting victims of the Tai Po fire in Hong Kong

HTHKH has supported Art Basel Hong Kong since 2022, by providing seamless 5G network and Wi-Fi services, enabling remote access to artworks through virtual reality platforms. By leveraging advanced connectivity technologies, HTHKH promotes inclusive access to art while supporting community well-being and cultural continuity.

HTHKH supporting Art Basel Hong Kong

WIND TRE TACKLING ONLINE BULLYING AND DIGITAL VIOLENCE

Wind Tre supports safer and more inclusive digital environments for young people through its partnership with the MABASTA (Anti-Bullying Movement Led by Teenage Students Association) delivering targeted awareness campaigns on bullying and digital violence in schools. Launched in late 2024, the initiative has already engaged more than 800 students across educational institutions in Bari and Palermo through classroom discussions and educational content. This has included educational content addressing cyberbullying, cyberstalking, and the non-consensual sharing of digital content. The programme will continue through 2026 with four additional schools participating and engaging over 1,600 upper secondary school students.

Students and Wind Tre employees supporting MABASTA

EMPLOYEE ENGAGEMENT IN SUPPORT OF LOCAL COMMUNITIES IN 3 AUSTRIA

3 Austria employees participate in multiple initiatives to support local communities. These include an annual 'Social Team Day' during which **3** Austria sponsors projects and employees volunteer their time, for example by helping elderly people in hospices, assisting people experiencing homelessness in shelters, cooking, gardening and more. These are organised in partnership with Caritas Austria, one of Austria's largest charitable organisations, which **3** Austria has supported for over 10 years. Since 2023, **3** Austria's company canteen has taken part in 'Suppe mit Sinn' ('Soup with Purpose'), a Winter donation campaign run by Tafel Austria that includes monetary donations and redirects surplus food to be distributed free of charge to people in need.

3 Austria's CEO supporting NGO Caritas Austria

APPENDICES

APPENDIX A: ENVIRONMENTAL AND SOCIAL KEY PERFORMANCE INDICATORS

GHG Emissions	Units	2025	Recalculated 2024[1]	Recalculated 2023[1]
Scope 1	tCO_2-e	12,479*	14,560	14,265
Scope 2 – market-based	tCO_2-e	244,214*	283,637	282,031
Scope 2 – location-based	tCO_2-e	313,966*	352,664	428,193
Scope 3 – total	tCO_2-e	808,099*	863,736	938,826
1: Purchased goods and services	tCO_2-e	437,839	441,481	455,802
2: Capital goods	tCO_2-e	133,982	195,448	228,905
3: Fuel- and energy-related activities	tCO_2-e	84,068	84,111	101,375
4: Upstream transportation and distribution	tCO_2-e	13,590	9,282	9,576
5: Waste generated in operations	tCO_2-e	30	26	93
6: Business travel	tCO_2-e	2,587	3,011	5,031
7: Employee commuting	tCO_2-e	5,584	5,370	5,150
8: Upstream leased assets	tCO_2-e	14,812	19,653	31,075
9: Downstream transportation and distribution	tCO_2-e	0	0	0
10: Processing of sold products	tCO_2-e	0	0	0
11: Use of sold products (direct)	tCO_2-e	55,332	57,575	49,976
12: End-of-life treatment of sold products	tCO_2-e	677	800	849
13: Downstream leased assets	tCO_2-e	0	0	0
14: Franchises	tCO_2-e	2,072	2,327	3,137
15: Investments	tCO_2-e	57,526	44,652	47,857
Total GHG emissions (scopes 1, 2 and 3)[2]	tCO_2-e	1,064,792	1,161,933	1,235,122
Total GHG emissions intensity (scopes 1, 2 and 3)[2]	tCO_2-e / revenue HK$'000	0.016	0.019	0.020
Total GHG emissions intensity (scope 1 and 2)[2]	tCO_2-e / revenue HK$'000	0.004	0.005	0.005

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 with an*. KPMG LLP's full statement is available on page 109 of this report.

GHG data for 2025 was calculated in accordance with the CKHGT GHG Reporting Criteria 2025. With the exception of GHG emissions, energy and water data, figures for 2023 and 2024 have not been recalculated, and include **3** UK, over which CKHGT had operational control prior to the merger between **3** UK and Vodafone UK.

Energy	Units	2025	Recalculated 2024[1]	Recalculated 2023[1]
Total energy consumption	MWh	1,497,793	1,449,793	1,420,346
Total direct energy consumption	MWh	41,387	41,760	41,973
Petrol	MWh	12,984	7,842	4,389
Diesel	MWh	23,107	28,235	32,372
Natural gas	MWh	4,213	4,595	4,400
Gas (excluding natural gas)	MWh	0	0	0
Solar	MWh	1,083	1,088	811
Total indirect energy consumed	MWh	1,456,406	1,408,033	1,378,373
Electricity	MWh	1,450,451	1,404,841	1,372,031
Heat	MWh	3,741	2,062	5,956
Self-generated and consumed from renewable sources	MWh	1,083	1,088	811
Purchased renewable energy consumption	MWh	885,919	802,674	725,806
Renewable energy percentage	Percentage	61%	57%	53%

1 Data for 2024 and 2023 has been restated to reflect the VodafoneThree transaction. See page 76 for further details.
2 Using scope 2 market-based emissions.

Network Energy Intensity	Units	2025	Recalculated 2024[1]	Recalculated 2023[1]
Total network data traffic	Petabytes (PB)	20,305	18,025	15,637
Network energy intensity	MWh/PB	70	76	86

Water	Units	2025[3]	Recalculated 2024[1]	Recalculated 2023[1]
Water withdrawal total	m^3	91,555	57,970	49,979
Water discharge total[4]	m^3	88,574	57,272	0
Water consumption total[5]	m^3	2,981	698	49,979
Water consumption intensity[5]	m^3 / revenue HK$'000	0.00003	0.00001	0.00058

Waste and Circular Economy	Units	2025	2024	2023
Hazardous waste – total produced[6,7]	Tonnes	243	308	315
Non-hazardous waste – total produced[6,8]	Tonnes	1,699	6,427	2,468
Non-hazardous waste – recycled[6,8]	Tonnes	1,405	5,484	1,918
Non-hazardous waste– other management methods[6]	Tonnes	293	942	550
Total waste recycled[6,8]	Tonnes	1,645	5,780	1,988

Waste and Circular Economy	Units	2025	2024	2023
Network waste[6,9]	Tonnes	1,423	1,528	1,839
Percent of network waste recycled[9]	Percentage	100%	62%	80%
Percentage of network equipment decommissioned in the reporting period that was repaired, reused or sold to another company (by mass)[9]	Percentage	40%	22%	7%
Total number of devices taken-back[6,9]	Number	93,028	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[9]	Percentage	3%	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[9]	Percentage	100%	100%	98%

1 Data for 2024 and 2023 has been restated to reflect the VodafoneThree transaction. See page 76 for further details.
3 Includes metered data from Wind Tre sites that was not metered and was therefore excluded from data collection in prior years.
4 Prior to 2024, CKHGT did not record water discharge and therefore assumed water consumption to be equal to water withdrawal.
5 Water consumption and intensity data comprises operations in HTHKH, Wind Tre and **3** Austria only in 2023.
6 Decrease attributed to the exclusion of **3** UK following the merger with Vodafone UK.
7 2023 data excludes **3** Sweden, **3** Denmark and Wind Tre.
8 2023 data excludes **3** Sweden and **3** Denmark.
9 2023 data excludes HTHKH.

Employee Numbers[10]	Units	2025	2024	2023
Number of employees – total	Headcount	13,008	17,359	17,491
By employment type – full time	Headcount	11,187	14,413	14,411
By employment type – part time	Headcount	1,821	2,946	3,080

Employee Demographics[10] (Based on full-time employees only)	Units	2025	2024	2023
By gender – male	Headcount	6,819	9,002	9,010
By gender – female	Headcount	4,368	5,411	5,401
By employee category – Manager grade or above	Headcount	645	999	1,873
By employment type – General staff	Headcount	10,542	13,414	12,538
By age group – under 30	Headcount	1,515	2,233	2,453
By age group – 30-49	Headcount	5,098	7,563	7,852
By age group – 50 or above	Headcount	4,574	4,617	4,106
By geographical region – Hong Kong	Headcount	1,019	1,020	1,061
By geographical region – Chinese mainland	Headcount	83	85	96
By geographical region – Europe and UK	Headcount	10,085	13,308	13,254

Employee Turnover[10]	Units	2025	2024	2023
Overall	Percentage	12%	13%	15%
By gender – male	Percentage	12%	13%	15%
By gender – female	Percentage	11%	13%	16%
By age group – under 30	Percentage	33%	37%	42%
By age group – 30-49	Percentage	10%	10%	11%
By age group – 50 or above	Percentage	5%	5%	6%
By geographical region – Hong Kong	Percentage	24%	32%	34%
By geographical region – Chinese mainland	Percentage	13%	21%	17%
By geographical region – Europe and UK	Percentage	10%	12%	14%

Workplace Health and Safety[10]	Units	2025	2024	2023
Work-related fatalities	Number of employees	0	0	0
Number of work-days lost due to injury	Number of days	1,323	1,379	239
Number of lost time injury incidents	Number of incidents	30	36	13

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

Training	Units	2025	2024	2023
Full-time employees who received training	Percentage	80%	78%	86%
Percentage of full-time employees who received training among total trained full-time employees				
By gender – male	Percentage	62%	60%	63%
By gender – female	Percentage	38%	40%	37%
By employee category – Manager grade or above	Percentage	5%	7%	10%
By employment type – General staff	Percentage	95%	93%	90%
Average hours of training completed by full-time employees – total	Hours	25	19	29
By gender – male	Hours	25	20	29
By gender – female	Hours	25	18	29
By employee category – Manager grade or above	Hours	20	22	14
By employment type – General staff	Hours	26	19	31

Training	Units	2025	2024	2023
Employees that received training on anti-corruption / ethics and integrity – total[11]	Number	3,975	10,795	9,422
By employment type – full time[11]	Number	3,385	8,075	7,068
By employment type – part time[11]	Number	590	2,720	2,354
Employees that received training on anti- corruption / ethics and integrity – percentage[11]	Percentage	31%	50%	43%
Number of training hours completed on anti- corruption / ethics and integrity – total[11]	Hours	5,921	13,326	14,343
By employment type – full time[11]	Hours	5,153	10,491	10,972
By employment type – part time[11]	Hours	768	2,836	3,372

Collective Bargaining	Units	2025
Percentage of workforce covered by a collective bargaining agreement[12]	Percentage	75%

[11] Wind Tre 2025 data reflects biennial training cadence with the majority of employees trained in 2024, however training will be annual from 2026.
[12] In 2025, the definition of required data was adjusted for business units and data for 2023 and 2024 is not available according to the updated definition. Employees covered by collective bargaining agreements in **3** Austria, **3** Sweden and **3** Denmark were newly reported. Data for years 2024 and 2023 have not been adjusted.

Customers and Products	Units	2025	2024	2023
Percentage of total products sold or shipped subject to recalls for safety and health reasons	Percentage	0%	0%	0%
Number of complaints – product related	Number	6,103[13]	40,069	35,686[14]
Number of complaints – service related	Number	645,080[13]	1,161,281[15]	825,260

Suppliers	Units	2025	2024	2023
Number of suppliers	Number	13,502	13,611	12,210
By geographical region – Asia (excluding Hong Kong, Chinese mainland)	Number	96	82	35
By geographical region – Australia	Number	9	11	11
By geographical region – Canada	Number	14	17	13
By geographical region – Europe	Number	11,731	11,282	9,990
By geographical region – Hong Kong	Number	489	343	401
By geographical region – Chinese mainland	Number	194	339	333
By geographical region – New Zealand	Number	3	2	2
By geographical region – Other regions	Number	106	71	54
By geographical region – United Kingdom	Number	726	1,302	1,240
By geographical region – United States	Number	134	162	131

[13] Decrease in 2025 as compared to 2024 attributed to the VodafoneThree transaction.
[14] Data from 2024 CKHGT Sustainability Report has been restated to correct a typographical error.
[15] Data from 2024 CKHGT Sustainability Report has been restated, reflecting a re-categorisation of service-related complaints by Wind Tre.

APPENDIX B: RECALCULATED GHG EMISSIONS DATA FOR 2023 AND 2024

This appendix shows the GHG emissions data of 2023 and 2024 that has been recalculated to align with the baseline recalculation outlined on page 76 of this report. The recalculation of 2023 and 2024 emissions data is fully attributable to the merger of Hutchison 3G UK Limited with Vodafone UK to form VodafoneThree.

GHG Emissions Data Recalculated	Units	CKHGT 2023 as previously published[1]	CKHGT 2023 recalculated	CKHGT 2024 as previously published	CKHGT 2024 recalculated
Scope 1	tCO_2-e	16,552	14,265	16,459	14,560
Scope 2 – market-based	tCO_2-e	312,882	282,031	313,402	283,637
Scope 2 – location-based	tCO_2-e	525,028	428,193	439,230	352,664
Scope 3 - total	tCO_2-e	1,304,608	938,826	1,232,016	863,736
Scope 3 – category 1: purchased goods and services	tCO_2-e	672,394	455,802	674,951	441,481
Scope 3 – category 2: capital goods	tCO_2-e	305,179	228,905	268,257	195,448
Scope 3 – category 3: fuel- and energy-related activities	tCO_2-e	132,967	101,375	109,413	84,111
Scope 3 – category 4: upstream transportation and distribution	tCO_2-e	15,667	9,576	15,085	9,282
Scope 3 – category 5: waste generated in operations	tCO_2-e	134	93	242	26
Scope 3 – category 6: business travel	tCO_2-e	6,611	5,031	4,634	3,011
Scope 3 – category 7: employee commuting	tCO_2-e	7,325	5,150	7,284	5,370
Scope 3 – category 8: upstream leased assets	tCO_2-e	31,075	31,075	19,653	19,653
Scope 3 – category 9: downstream transportation and distribution	tCO_2-e	0	0	0	0
Scope 3 – category 10: processing of sold products	tCO_2-e	0	0	0	0
Scope 3 – category 11: use of sold products (direct)	tCO_2-e	80,737	49,976	84,445	57,575
Scope 3 – category 12: end-of-life treatment of sold products	tCO_2-e	1,525	849	1,072	800
Scope 3 – category 13: downstream leased assets	tCO_2-e	0	0	0	0
Scope 3 – category 14: franchises	tCO_2-e	3,137	3,137	2,327	2,327
Scope 3 – category 15: investments	tCO_2-e	47,857	47,857	44,652	44,652
Total GHG emissions (scopes 1, 2 and 3)[2]	tCO_2-e	1,634,042	1,235,122	1,561,877	1,161,933
Total GHG emissions intensity (scopes 1, 2 and 3)[2]	tCO_2-e / revenue HK$'000	0.019	0.020	0.018	0.019
Total GHG emissions intensity (scope 1 and 2)[2]	tCO_2-e / revenue HK$'000	0.004	0.005	0.004	0.005

[1] Previously published in the CKHGT Sustainability Report 2024.
[2] Using scope 2 market-based emissions.

APPENDIX C: GRI CONTENT INDEX

Statement of use	CKHGT has reported the information cited in this GRI Content Index for the period from 1 January 2025 to 31 December 2025 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. 6) Results for the year ended 31 December 2025 (CKHGT annual report p. 1)
	2-5 External assurance	Assurance statement (p. 109)
	2-6 Activities, value chain and other business relationships	Double materiality assessment (p. 13)
	2-7 Employees	Appendix A: Environmental and social key performance indicators (p. 103)
	2-9 Governance structure and composition	Corporate Governance Report (CKHH annual report p. 112)
	2-10 Nomination and selection of the highest governance body	Nomination of directors (CKHH annual report p. 114)
	2-11 Chair of the highest governance body	Nomination of directors (CKHH annual report p. 114)
	2-14 Role of the highest governance body in sustainability reporting	Sustainability governance (p. 10)
	2-19 Remuneration policies	Remuneration of directors and senior management (CKHH annual report p. 118)
	2-20 Process to determine remuneration	Remuneration of directors and senior management (CKHH annual report p. 118)
	2-22 Statement on sustainable development strategy	Message from the Chairperson (p. 5)
	2-23 Policy commitments	Governance policies (CKHH annual report p. 110)
	2-29 Approach to stakeholder engagement	Stakeholder engagement (p. 11)
	2-30 Collective bargaining agreements	Appendix A: Environmental and social key performance indicators (p. 104)
GRI 3 - Material Topics	3-1 Process to determine material topics	Double materiality assessment (p. 13)
	3-2 List of material topics	CKHGT material topics (p. 15)
	3-3 Management of material topics	Sustainability strategy (p. 17)
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-related risk and opportunity management (p. 65)
GRI 203 - Indirect Economic Impacts	203-1 Infrastructure investments and services supported	Next generation networks and connectivity solutions (p. 70)

GRI Standard	Disclosure	Location
GRI 302 - Energy	302-1 Energy consumption within the organisation	Climate metrics and performance (p. 75) Appendix A: Environmental and social key performance indicators (p. 101)
	302-3 Energy intensity	Appendix A: Environmental and social key performance indicators (p. 102)
GRI 303 - Water and Effluents	303-3 Water withdrawal	Appendix A: Environmental and social key performance indicators (p. 102)
	303-4 Water discharge	Appendix A: Environmental and social key performance indicators (p. 102)
	303-5 Water consumption	Appendix A: Environmental and social key performance indicators (p. 102)
GRI 305 - Emissions	305-1 Direct (Scope 1) GHG emissions	Climate metrics and performance (p. 75) Appendix A: Environmental and social key performance indicators (p. 79)
	305-2 Energy indirect (Scope 2) GHG emissions	Climate metrics and performance (p. 75) Appendix A: Environmental and social key performance indicators (p. 79)
	305-3 Other indirect (Scope 3) GHG emissions	Climate metrics and performance (p. 75) Appendix A: Environmental and social key performance indicators (p. 79)
	305-4 GHG emissions intensity	Climate metrics and performance (p. 75) Appendix A: Environmental and social key performance indicators (p. 80)
	305-5 Reduction of GHG emissions	Decarbonisation pathway (p. 67) Appendix A: Environmental and social key performance indicators (p. 101)

GRI Standard	Disclosure	Location
GRI 306 - Waste	306-1 Waste generation and significant waste-related impacts	Enabling circularity of devices and networks (p. 79)
	306-2 Management of significant waste-related impacts	Enabling circularity of devices and networks (p. 79)
	306-3 Waste generated	Appendix A: Environmental and social key performance indicators (p. 102)
	306-4 Waste diverted from disposal	Appendix A: Environmental and social key performance indicators (p. 102)
	306-5 Waste directed to disposal	Appendix A: Environmental and social key performance indicators (p. 102)
GRI 403 - Occupational Health and Safety	403-1 Occupational health and safety management system	Health and safety (p. 41)
	403-9 Work-related injuries	Appendix A: Environmental and social key performance indicators (p. 103)
GRI 404 - Training and Education	404-1 Average hours of training per year per employee	Appendix A: Environmental and social key performance indicators (p. 104)
	404-2 Programs for upgrading employee skills and transition assistance programs	Employee capabilities (p. 95)
GRI 405 - Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	Appendix A: Environmental and social key performance indicators (p. 103)

APPENDIX D: ASSURANCE STATEMENT

Independent Practitioner's Limited Assurance Report to CK Hutchison Group Telecom Holdings Limited for the year ended 31 December 2025

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 2025.

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 2025 has been properly prepared in accordance with "Reporting Criteria". The Reporting Criteria we used to form our judgements are CKHGTH's Greenhouse Gas Reporting Criteria (2025) 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 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 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

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

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, 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 two 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 conversion 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;
- 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
03 September 2026

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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, tCO_2e	12,479
Scope 2 GHG market-based emissions, tCO_2e	244,214
Scope 2 GHG location-based emissions, tCO_2e	313,966
Scope 3 emissions, tCO_2e	808,099

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