



Sustainability Report

About this Report

Hutchison Telecommunications Hong Kong Holdings Limited (the "Company" or "HTHKH") and its subsidiaries (collectively the "Group") present the following 2024 Sustainability Report (the "Report"). This report highlights the Group's sustainability strategies, policies, management approaches to material topics, and sustainability performance of the Group in 2024.

The Group's key sustainability mission is to align its sustainability objectives with the strategic development of its businesses to create long-term value for all stakeholders. As a leading player in the telecommunications industry, the Group is dedicated to providing a broad range of secure, seamless and cutting-edge mobile telecommunications and data solutions to address the rapidly evolving digital landscape, enabling consumers and enterprises to capitalise on the digital evolution.

The Group upholds a high standard of business ethics and compliance. The Group conducts business activities responsibly and ethically, and engages with all its stakeholders in a transparent and accountable manner. The Group is also dedicated to supporting the United Nations Sustainable Development Goals ("UNSDGs") to foster inclusive, sustainable and digitally-enabled societies.

Reporting period

This sustainability report covers the Group's sustainability performance from 1 January to 31 December 2024 (the "Reporting Period"), unless otherwise specified.



Reporting scope

Information disclosed in this Report covers the mobile telecommunications businesses of the Group in Hong Kong and Macau.

Reporting framework

This report has been prepared in accordance with mandatory disclosure requirements and "comply or explain" provisions of the Environmental, Social and Governance Reporting Guide ("ESG Guide") as set out in Appendix C2 to the Listing Rules. Please refer to the HKEX ESG Guide Content Index for information about the specific disclosures. The Group has also referenced selected standards from the Global Reporting Initiatives ("GRI").

This report should be read in conjunction with the 2024 Annual Report ("Annual Report"), which provides a comprehensive view of the Group's financial performance and corporate governance as well as the key policies of the Group published on the Company's website \in .



Reporting principles

The contents of this report follow the ESG Guide reporting principles:

Materiality: The Group focuses on matters that impact business growth and are of importance to its stakeholders. Active engagement with different stakeholders and materiality assessments facilitate the identification of material topics related to the Group's stakeholders and business operations. For more information, please refer to "Materiality Assessment" on page 94.

Quantitative: Information regarding methodologies, standards, calculation references, assumptions and sources of key conversion factors used for key performance indicators ("KPIs"), along with other relevant information, is stated wherever appropriate.

Balance: This Report discloses information in an objective manner, aiming to provide stakeholders with an unbiased picture of the Group's overall sustainability performance.

Consistency: Consistent methodologies are adopted when calculating the quantitative KPIs unless otherwise specified. Where applicable, any changes to the methods or KPIs used have been disclosed.

Feedback

The Group welcomes feedback and suggestions. Please contact us via the QR code below or email us at sustainability@hthk.com.



Sustainability at the Group

2024 Performance highlights

Annual reduction target for carbon emission intensity (1)

Achieved



1,181 **Employees**



Lead-acid Battery waste recycled



Male employees (2)



Female employees (2)





Full-time employees



Part-time employees



Network coverage



Average training hours (3)





92% employees completed training on a

Completed training on anticorruption/ethics and integrity



Notes:

- (1) Carbon emission intensity represents carbon emission per terabyte ("TB") of data traffic (kgCO₂e per TB). The Group has set a target to reduce carbon emission intensity
- The ratio of workforce by gender refers to the number of full-time employees by gender. (2)
- The number of average training hours refers to training hours completed by full-time employees. (3)

Reporting what matters

Sustainability plays a pivotal role in ensuring that the Group maintains its position as a responsible digital service provider and upholds the well-being and prosperity of the communities in which it operates. The Group recognises the importance of understanding stakeholder views and considering stakeholder perspectives in shaping a strategy that places the interests of society and the environment at the forefront. Embracing sustainability is deeply ingrained in the Group's core values as manifested in its corporate strategies, demonstrating its commitment to responsible business practices and long-term societal and environmental impact.

Stakeholder engagement

The Group actively fosters open and transparent dialogues with a diverse array of stakeholders, including employees, customers, suppliers and business partners, banks and creditors, shareholders and investors, governments and regulators, as well as local communities and non-governmental organisations. To effectively engage and communicate with that broad range of stakeholders, and gain insights into their views and expectations, the Group has established a wide range of channels for effective communication and stakeholder engagement. The following figure provides an overview of these channels, which serves as valuable avenues for understanding and responding to the needs and concerns of the Group's stakeholders.

ESG rating agency assessments support investors and other stakeholder groups to evaluate the Group's sustainability performance and efforts. In response to valuable feedback from investors regarding the Environmental, Social and Governance ("ESG") rating, the Group has addressed its disclosures on various sustainability topics to adequately meet the specific information requests from the rating agencies involved. The Group received a 'AA' ESG rating from Morgan Stanley Capital International ("MSCI") and a ESG risk rating of '26.7' from Sustainalytics ESG rating as at the publication of this report. These achievements underscore the Group's ongoing dedication to sustainable practices. In a bid to maintain these high ESG ratings, the Group continues to devote robust sustainability efforts and develop responsible business practices so as to enhance investors' and stakeholders' confidence and trust in the Group.

The Group values its relationships with stakeholders and continues to strengthen its sustainability performance in line with stakeholders' increasing expectations for sustainable development. During the Reporting Period, the Group actively engaged with stakeholders through multiple channels. Their insights and expectations are essential for formulating the Group's sustainability strategies, targets and goals.

Figure 1: Stakeholder Engagement

Employees

- Intranet
- Town halls
- Internal newsletters
- Performance reviews

Customers

- Customer satisfaction surveys
- Hotlines, email enquiries and WhatsApp
- Mobile applications
- Customer loyalty programmes and events
- Mystery shopper programme
- Websites and social media platforms

Non-governmental organisations

- Collaborations
- Community investments
- Seminars
- Volunteering

HTHKH key stakeholder groups

Suppliers and business partners

- Suppliers' reviews and assessments
- Suppliers' Carbon Disclosure
 Project ("CDP") questionnaires
- On-site visits
- Meetings
- Events and seminars
- Regular business reports

Local communities

- Community projects
- Interviews
- Media enquiries
- Press release and conferences
- Websites and social media platforms

Banks and creditors

- Announcements and circulars
- Annual and interim reports
- Corporate communications
- Meetings

Governments and regulators

- Circulars and guidelines
- Compliance reporting
- Government liaison groups
- Meetings
- On-site inspections
- Representation at committees or panels
- Representation to surveys and consultations conducted by regulatory authorities

Shareholders and investors

- Analyst briefings
- Announcements and circulars
- Annual general meetings
- Annual, interim and sustainability reports
- Corporate communications
- Email enquiries
- Websites

Materiality Assessment

Materiality assessment is an important process to understand the Group's stakeholders' expectations on the materiality of different sustainable topics and ensure that the Group's sustainability commitments and strategies are aligned accordingly. In 2024, the Group conducted its materiality assessment in four stages, including identification, screening, prioritisation and validation.

During the Reporting Period, the Group actively engaged with different internal and external stakeholders. Their feedback helped the Group identify the key sustainability issues that hold great significance to the Group and its stakeholders. These evaluated topics are presented in a materiality matrix, with two dimensions, importance to the Group (internal stakeholders) and external stakeholders, represented along the horizontal and vertical axes.

During the Reporting Period, the Group has identified and assessed 20 topics. Among these topics, seven are highly material, eight are moderately material and five are generally material. The results of the materiality assessment are confirmed by the Sustainability Committee.

Figure 2: The Four-step Iterative Approach for Group Materiality Assessment

_ Identification

Identified potential sustainability topics relevant to the Group through desktop research and referencing:

- Sector-specific standards relating to sustainability (Sustainability Accounting Standards Board Materiality Map)
- External ESG rating reports
- Peers
 Benchmarking

Screening

The list of potential topics was then screened by the sustainability working group to shortlist 20 topics for stakeholders to evaluate and prioritise.

Prioritisation

Based on results from internal and external stakeholders' surveys, the Group assessed and prioritised sustainability issues that have a significant impact on the Group's ability to create long-term and sustainable value.

Validation

The results of the materiality assessment were shared with the Sustainability Working Group, ensuring alignment with the Group's strategic direction and goals, and reviewed and approved by the Group's Sustainability Committee

The most material topics for the Group are identified in the top right-hand corner. During the Reporting Period, the Group integrated these highly material topics into its governance and management systems as well as its daily operations.

Figure 3: Materiality Matrix

High



Group Sustainability Framework

The Group acknowledges the importance of sustainable development and is committed to contributing to the achievements of the UNSDGs and the objectives outlined in the 2015 Paris Agreement through the integration of sustainability management into its governance and management structure. The Group's governance structure comprises both Board-level and management-level committees and working groups responsible for approving the results of the materiality assessment, implementing sustainability related policies, and monitoring their effectiveness.

To effectively manage its sustainability topics, which have been identified and assessed for materiality through a comprehensive materiality assessment, the Group has established a sustainability framework. The framework is built upon four pillars: Governance, Sustainable Business Model & Innovation, Environment and Social. Each pillar has its own goals, and is supported by the corresponding Group policies, leadership and collective efforts across the entire business. This framework provides clear direction for the Group's journey toward sustainable development, and the efforts associated with each pillar are discussed in the following sections.

Figure 4: Group Sustainability Framework

Pillars	Material Topics	Goals	Mapping to the UNSDGs
Governance	 Integrated Governance Structure Internal Control Framework Data Privacy and Cyber Security Labour and Human Rights Supply Chain Responsibility Systematic Risk Assessment 	 Embed Rigorous and Effective Governance Operate Responsibly with Integrity 	8 DECENTI WORK AND ECONOMIC GROWTH 16 PEACE, JUSTIDE AND STRONG INSTITUTIONS 17 PARTNERSHIPS FORTHEGOALS

Pillars	Material Topics	Goals	Mapping to the UNSDGs
Sustainable Business Model & Innovation	 Service Excellence Climate Resilient Business Digital Inclusion Customer Data Privacy and Protection Customer Service Satisfaction 	3. Offer Customers Sustainable Products and Invest in and Embrace Innovation to Achieve Transformational Impacts	9 MOUSTRY INDIVIDUAL 11 SUSTAINABLECTIES AND COMMUNITIES 12 RESPONSIBLE CONSIMPTION AND PRODUCTION AND PRODUCTION

Pillars	Material Topics	Goals	Mapping to the UNSDGs
Environment	DecarbonisationClimate ActionCircular Economy	4. Take Action on Climate Change5. Protect Natural Resources6. Promote a Circular Economy	6 CLEANWAIER TO AFFORDABLE AND CLEANBRIGHT
			11 SUSTAINABLECTIES 12 RESPONSIBLE CONSIMERION AND PRODUCTION AND PRODUCTION
			13 ACTION 14 BECOMMATER EXAMPLE 14 BECOMMATER
			15 ONLING

Pillars	Material Topics	Goals	Mapping to the UNSDGs
Social	 Talent Attraction Employee Engagement Learning and Development Health, Safety and Wellbeing Inclusion and Diversity Community Investment 	7. Create Great Places to Work8. Invest in Developing Thriving & Resilient Communities	1 NO POVERTY THE POVERTY 2 ZERO HUMGER CCCC CCCC 3 GOOD HEALTH AND WELL BEING 4 GOULATION LITTLE 1 DATE TO SERVE THE POVERTY AND WELL BEING THE POVERTY THE POVERY
			5 GENDER 8 DECENT WORK AND ECONOMIC GROWTH
			10 REDUCED RECORDED A

Process Highlights and Plans

Figure 5: Group Highlights and Ambitions

Governance

Goals

- Embed rigorous and effective governance
- Operate responsibly with integrity



Highlights for 2024

- 92% of employees completed trainings on anti-corruption/ethics and integrity.
- Launched a cyber security training platform.

Objectives and Targets (2025-26)

- Support business units in rolling out sustainability strategies that address the impacts and material topics specific to the operations.
- Further enhance sustainability reporting based on sustainability reporting frameworks such as the new climate disclosure requirements of HKEX.

Sustainable Business Model & Innovation

Goals

• Offer customers sustainable products and invest in and embrace innovation to achieve transformational impacts



Highlights for 2024

- Scope enhancement in terms of ISO certifications.
- Ongoing focus and delivery of smart city solutions.
- Continued to offer Free Anti-Scam Service to postpaid elderly customers.
- Enhanced digital literacy among young students.

Objectives and Targets (2025-26)

- Continue to develop innovative products and solutions that facilitate the transition to net-zero emissions and support the creation of smart cities.
- Deliver digital inclusion benefits for target populations, including senior citizens, young children and small businesses.

Environment

- Goals Take action on climate change
 - Protect natural resources
 - Promote a circular economy



Highlights for 2024

- Participated in CK Hutchison Group Telecom Holdings Limited's ("CKHGT") initiatives to complete the external limited data assurance for the 2023 data.
- Collaborated with Huawei International Company Limited to adopt an industry-leading AI energy-saving solution to enhance the efficient use of energy at base stations.
- Performed a review of the GHG emissions and management practices of top suppliers by spend.
- Achieved 100% lead-acid battery recycling for Hong Kong operations.

Objectives and Targets (2025-26)

- Further develop energy reduction initiatives to align with the Science Based Targets Initiatives ("SBTi") target committed by CKHGT.
- Further expand scope 3 emissions reporting.

Social

Goals

- Create great places to work
- Invest in developing thriving and resilient communities



Highlights for 2024

- Organised health and wellness activities to promote employee well-being and foster a positive workplace culture.
- Invested HK\$12.5 million in community initiatives.
- Received the Asia's Best Employer Brand Award from the 15th Asia's Best Employer Brand Awards and the Good MPF Employer Award from the Mandatory Provident Fund Schemes Authority.

Objectives and Targets (2025-26)

- Continue to seek potential enhancements in employee benefits.
- Continue to make progress in addressing diversity and inclusion related issues, in addition to developing related targets.
- Continue to provide learning and development opportunities to all employees and talents.
- Promote healthcare and well-being initiatives in the workplace.
- Be an active member of the community, targeting investments to meet the needs of the community.

Awards, Honours and Certifications

HTHKH's sustainability efforts are recognised by various stakeholders. In addition to accolades from ESG rating agencies, the Group was honoured with several awards during the Reporting Period, as summarised below.

The Group has implemented the integrated management system several years ago to obtain certifications in the environmental management system and the occupational health and safety management system for certain office and cell sites. During the Reporting Period, the Group expanded the scope of ISO certification to additional sites. In addition, certifications related to data security and privacy were awarded. Detailed information regarding these certifications is provided in the following sections.

Certifications

- ISO 14001:2015 Environmental Management System Certificate
- ISO 45001:2018 Occupational Health and Safety Management system Certificate
- "Good Level" Wastewise Certificate Hong Kong Green Organisation Certification
- "Good Level" Energywise Certificate Hong Kong Green Organisation Certification
- Certificate of Compliance Payment Card Industry Data Security Standard (PCI DSS v4.0 Merchants)

Award

- 2024 ESG Grand Award Master-Insight.com x The Hang Seng University of Hong Kong ESG Awards 2024
- Award of Excellence in ESG (Other and GEM Companies category) The Chamber of Hong Kong Listed Companies and the Centre for
 Corporate Governance and Financial Policy, Hong Kong Baptist
 University, Hong Kong Corporate Governance and ESG Excellence
 Awards 2024
- ESG Social Innovative Technology Award (Small market capitalisation / GEM) - TVB ESG Awards 2024

Rating

- 'AA' in MSCI ESG rating
- ESG risk rating of '26.7' in Sustainalytics ESG rating

Governance

The Group has strived to integrate sustainability into its corporate governance and core strategy. A robust sustainability governance structure enhances its ability to align with the needs and interests of the Group and its stakeholders. Effective governance enables the Group to operate with integrity and make informed, ethical decisions in the best interests of all stakeholders.

This section should be read alongside the Corporate Governance Report in the Annual Report, which details the Group's corporate governance framework and practices.

Group Goals

- Embed rigorous and effective governance
- Operate responsibly with integrity

Content in this Section

- Integrated Governance Structure
- Internal Control Framework
- Data Privacy and Cyber Security
- Labour and Human Rights
- Supply Chain Responsibility
- Systematic Risk Assessment

Mapping to the UNSDGs







Integrated Governance Structure

The Group has established a comprehensive and robust governance structure, which includes the Board, specialised Board-level committees, and management-level working groups. This structure encompasses the Sustainability Committee, Audit Committee, Remuneration Committee, Nomination Committee, Security Committee, Sustainability Working Group, Governance Working Group, and various business units, all tasked with effectively addressing emerging trends, risks and opportunities.

The Group has embedded sustainability principles into its governance framework. A Board-level Sustainability Committee, supported by a management-level Sustainability Working Group, is responsible for executing and overseeing sustainability initiatives as well as climate-related risks across the Group reporting directly to the Board.

Each committee and working group hold regular meetings to discuss and monitor the latest trends, developments, and performance related to the Group's objectives. Additionally, bi-annual self-assessment reviews are conducted across business units, in conjunction with internal audit assurance, with findings reported to multiple specialised functions within the Group. The Group has adopted and implemented corporate governance principles and practices that prioritise a high-quality Board, effective risk management and internal control systems, rigorous disclosure practices, transparency and accountability.

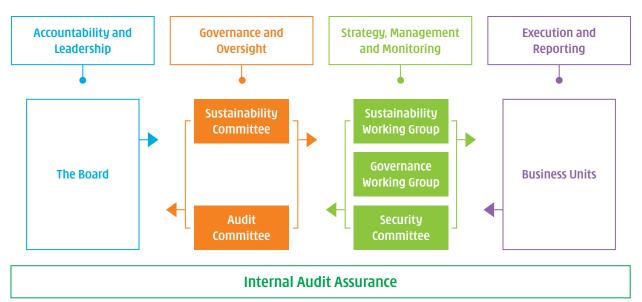


Figure 6: HTHKH's Integrated Governance Structure

The Board

The Board is responsible for overseeing the Group's business operations, risk management frameworks, internal control systems, and sustainability-related matters. With the support of the Sustainability and Audit Committees, the Board conducts through reviews and evaluations of the Group's risks and opportunities, including those related to climate change and cyber risk, as well as the corresponding strategic management measures.

The Board considers and reviews reports from various committees and working groups, approving the annual report, interim report and sustainability report. Additionally, it evaluates the effectiveness of risk management structures and internal control systems through the Audit Committee. By cultivating a risk-aware culture among employees, the Board ensures that appropriate measures and policies are effectively implemented across the Group's operations.

Furthermore, the Board considers the results of sustainability assessments and stakeholder feedback, integrating these insights into its daily management practices.

Board ESG training

To effectively oversee sustainability strategies and understand the impacts of climate change, Board members are receiving regular training to ensure they have sufficient sustainability knowledge. Upon appointment, Directors are provided with comprehensive orientation materials comprising information on the Group, duties as a director and board committee member, as well as internal governance and sustainability policies of the Group.

Additionally, the Group arranges and provides Continuous Professional Development ("CPD") training to Directors in the form of formal training programmes, seminars, workshops, expert briefings, webcasts and selected reading materials. This training keeps Directors informed about current trends and issues, including those relating to sustainability and climate-related reporting. For further details please refer to the "Corporate Governance Report" of this Annual Report.

Board diversity

The Group acknowledges the significant benefits that diversity brings to the Board, enhancing its effectiveness and decision-making capabilities. To support this, the Group has established a Director Nomination Policy and a Board Diversity Policy. These policies ensure that a range of factors including gender, age, culture, ethnicity, educational background, professional experience, and other pertinent criteria are considered when nominating candidates for the Board. The Nomination Committee is responsible for reviewing the structure, size and composition of the Board, ensuring that it has sound diversity and a balanced composition of skills and experience appropriate for the requirements of the businesses of the Group. Additionally, the Committee conducts regular evaluations of the Board Diversity Policy to ensure its ongoing effectiveness.

During the Reporting Period, the Group appointed two new Independent Non-executive Directors to succeed two who retired. The Board consists of 10 directors, including two Executive Directors, four Non-executive Directors, and four Independent Non-executive Directors, surpassing the minimum one-third requirement for Independent Non-executive Directors as stipulated by the Listing Rules. Female representation on the Board stands at 30%, a relatively high level amongst companies listed on the Stock Exchange ⁽⁴⁾.

Sustainability Committee

The Board-level Sustainability Committee serves as a fundamental component of the Group's sustainability strategy and impact management. The Sustainability Committee was formed in 2020, and is chaired by Ms Shih, Non-executive Director, with Mr Koo, Executive Director and Chief Executive Officer, and Ms Chow, Independent Non-executive Director (appointed following the retirement of Dr Wong, a former Independent Non-executive Director, on 9 May 2024), as members. The Sustainability Committee holds meetings bi-annually. Its responsibilities include overseeing, reviewing, and evaluating the measures and actions undertaken by the Group to advance its sustainability priorities and goals. Additionally, it provides recommendations to the Board regarding sustainability objectives, strategies and targets.

The Sustainability Committee further evaluates and monitors emerging sustainability trends and issues that may impact the Group's operations and performance, reviewing and reporting on climate-related risks and opportunities to the Board. Furthermore, it considers the impact of the Group's sustainability initiatives on stakeholders and provides the Board with value-accretive advice on external communication, disclosure and publications related to sustainability performance.

Audit Committee

The Audit Committee currently comprises three independent non-executive directors. It is responsible for supervising and ensuring the effectiveness and sufficiency of the Group's risk management and internal control systems (including cyber risks). This oversight includes financial, operational and compliance aspects, ensuring comprehensive coverage across these key areas.

Governance Working Group

The Governance Working Group is chaired by a non-executive director and includes representatives from key business functions of the Group. It supports the Audit Committee by providing timely updates on emerging matters of compliance.

Note

Sustainability Working Group

The Sustainability Working Group is a management-level group that supports the Sustainability Committee in its mission to implement the Group's sustainability management. It is co-chaired by the Chief Executive Officer and the Chief Financial Officer, and includes experienced senior executives from key business functions that have a significant influence on the Group's material sustainability topics. The primary role of the Sustainability Working Group is to support the Sustainability Committee to evaluate the latest sustainability-related trends, assess the Group's sustainability performance and targets, and provide insights on emerging sustainability risks and opportunities.

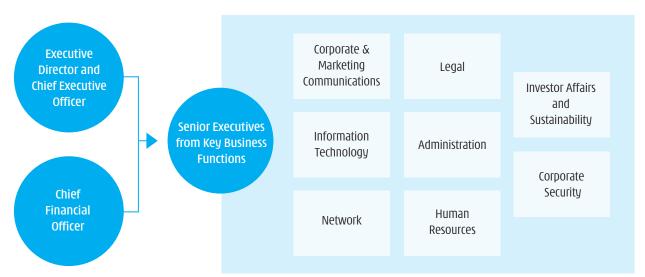


Figure 7: Sustainability Working Group Structure

Security Committee

The Security Committee is led by the Vice President - Digital Innovations & IT Development, and includes technical specialists from the Information Technology department and experts from the Corporate Security & Fraud Management function.

Its primary responsibility is to oversee the Group's defences against cybersecurity risks, fraud, and bribery risks, ensuring their effectiveness, coherence and coordination. The committee monitors the cyber threat landscape to gain valuable insights into existing and emerging security attacks and their implications through monthly cyber-as-a-service reports by third party experts, which include details of security alerts and prevented attacks, and meets regularly with senior management to discuss such threats and assess their potential impact on the Group's operations.

Internal audit assurance

Internal Audit, reporting directly to the Audit Committee, delivers independent assurance on the effectiveness of the Group's risk management activities and controls, including those associated with sustainability and cyber risk matters.

Each year, Internal Audit develops the audit strategy by assessing various business units, taking into account both internal and external factors, such as regulatory requirements, emerging trends in sustainability and cyber risk, and changes in business operations.

Risk management

The Group's risk management framework is based on the Committee of Sponsoring Organisations of the Treadway Commission ("COSO") model to systematically manage risk. This model comprises five essential steps, which require each business unit to perform a comprehensive self-assessment to evaluate the effectiveness of its risk management practices.

The Group evaluates identified risks across four dimensions - strategic, financial, operational and compliance. This comprehensive assessment involves analysing the likelihood and potential impact of each risk, developing targeted risk mitigation measures, and assessing the likelihood and impact of any residual risks. Findings are compiled into a report for review and approval by both the Board and the Audit Committee, and this collaborative approach ensures that risk management practices align with the Group's overall strategic objectives and regulatory requirements. Relevant results are also shared with the external auditor to ensure transparency and accountability.

In addition, the Group's Crisis Management Team, which includes the Chief Executive Officer, Chief Financial Officer, Chief Technology Officer, and representatives from business units conduct annual crisis drills, simulating various hypothetical scenarios to enhance the preparedness of each team in effectively managing crises and mitigating their impact.

Internal Control Framework

The Group prioritises compliance with laws and regulations, sound governance, and business integrity. To support this commitment, the Group has established a comprehensive internal control framework that encompasses anti-corruption measures, training programmes, due diligence processes, and a whistleblowing mechanism. Additionally, the Group has developed various policies addressing topics such as sustainability, anti-fraud initiatives, corporate governance and cybersecurity. These policies, alongside specific procedures and guidelines are implemented across the Group to meet operational needs and to comply with legal and regulatory requirements. The Group places a strong focus on monitoring and enforcing compliance with its policies, procedures and guidelines. Regular management reviews and reporting are conducted to assess the execution and adherence to these standards. The Group, through translating its values into actions, reaffirms its commitment to business integrity, its people, the environment and the communities in which it operates. For more detailed information on corporate governance, please refer to the "Corporate Governance Report" of this Annual Report.

Below is a list of the Group's key governance policies.

Figure 8: Governance Policies

Corporate governance

- Board Diversity Policy
- Code of Ethics
- Director Nomination Policy
- Corporate Communications Policy
- Policy on Appointment of Third Party Representatives
- Policy on Securities Dealings and Handling of Confidential and Price-sensitive Inside Information
- Stakeholders Communication Policy

Sustainability

- Environmental Policy
- Health and Safety Policy
- Human Rights Policy
- Modern Slavery and Human Trafficking Statement
- Supplier Code of Conduct
- Sustainability Policy
- Biodiversity Policy
- Workforce Diversity Policy

Cyber security

- Information Security Policy
- Policy on Personal Data Governance
- Cyber Security Policy
- Cyber Security Standard

Anti-corruption

- Anti-Fraud and Anti-Bribery Policy
- Whistleblowing Policy
- Purchasing Policy
- Business Partner Evaluation Policies and Procedures

A zero tolerance approach to fraud and corruption

The Group has implemented several key policies, including the Code of Ethics and the Anti-Fraud and Anti-Bribery Policy. 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.

The Code of Ethics specifically addresses the management of conflicts of interest, emphasising that employees must remain vigilant and avoid situations that could lead to such conflicts. Employees are required to promptly report any instances or activities that may involve potential conflicts of interest to the Human Resources Department. Such cases will be reviewed by the heads of the relevant departments, along with teams from the Human Resources, Legal and Regulatory Affairs, and Corporate Security, to determine appropriate actions. Non-compliance with the Code of Ethics may result in disciplinary actions, and any violations will be reported to regulatory authorities as deemed necessary.

Designated whistleblowing channels have been established for employees and third parties to report any illegal or unethical incidents that violate laws or the Code of Ethics. All reports will be treated as confidential to the extent possible as allowed by law.

Additionally, the Code of Ethics underscores the Group's commitment to business integrity, requiring employees to maintain high standards of honesty and transparency in interactions. The Group 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 Group funds or assets for political or charitable contributions and sponsorships.

The Group is committed to treating all business partners with fairness, honesty and professionalism. The Group has established a Purchasing Policy and Supplier Code of Conduct to govern the selection and renewal of suppliers. Contractors or suppliers with a history of bribery or corruption will not be considered for collaboration with the Group. To ensure thoroughness, the Group assigns adequately skilled individuals to conduct due diligence during the selection and renewal processes for contractors and suppliers.

During the Reporting Period, the Group did not have any concluded legal cases regarding corrupt practices brought against the Group and its employees.

Communication and training

To ensure that all employees are aware of and understand the Group's corporate policies while maintaining integrity in daily operations, the Group organises annual policy training for all staff, including both full-time and part-time employees. Each employee is required to complete an assessment based on the training materials to confirm their knowledge and understanding of the content. These materials are developed by relevant departments to ensure that employees receive the latest information on governance and anti-corruption standards applicable to the Group's operations.

The training materials outline relevant policies and procedures in areas such as corporate governance, data privacy and protection, anti-corruption and sustainability. They include highlights of each policy's focus and requirements, updates on standards, and case studies for employee reference. Additionally, the Group addresses the roles of various departments in managing fraud effectively.



The Group organises seminars by inviting industry experts to share valuable experiences from time to time.

The Company also organises and offers CPD training including seminars, webcasts and relevant reading materials to Directors. This training enables Directors to keep pace with current trends and issues that are relevant to the Group. The topics covered in the training encompass latest change in commercial (including industry-specific and innovative technology changes), legal and regulatory environmental in which the Group's business operations. Furthermore, the training helps refresh the Directors' knowledge and skills regarding their roles, functions and duties as directors of a listed company. Directors are required to provide the company with details of CPD training undertaken by them from time to time, the training records are maintained by the Company Security and are made available for regular review by the Audit Committee. An average of approximately 28 hours of CPD training were undertaken by each Director during the Reporting Period. For more information, please refer to the "Training" section of the Corporate Governance report.

Business partners due diligence

The Group is dedicated to fostering a trustworthy and compliant business environment with its business partners and suppliers. To achieve this, the Group has established the Supplier Code of Conduct, Purchasing Policy, and Business Partner Evaluation Policies and Procedures. These frameworks enable the Group to assess its business partners and suppliers, ensuring that their operations are conducted legally and partnerships are sound.

The Group has established pre-defined criteria for evaluating business partners and suppliers to ensure they meet its required standards. Performance assessments are conducted regularly, focusing on factors such as technology, sustainability, quality, and reputation. Business partners and suppliers are required to provide supporting documentation for evaluation and record-keeping. Regular evaluations of project performance and the products/services provided will be conducted in accordance with contractual terms and agreed-upon standards.

The Supplier Code of Conduct stipulates that the Group adheres to all local and national standards to prevent any form of bribery and requires its business partners and suppliers to implement their own anti-corruption measures and programmes.

Additionally, the Supplier Code of Conduct outlines ethical standards that 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.

Monitoring and review

The Group has established robust financial controls to safeguard against irregularities or misconduct, which include measures such as appropriate segregation of duties, authorisation controls, meticulous record-keeping, provision of supporting documentation and audit trails. This control system undergoes regular reviews and audits. Internal Audit, specifically responsible for evaluating the effectiveness and adequacy of the Group's internal control system, conducts independent audits of the Group's ethical standards and policies across various areas such as anti-corruption, fraud incident management, supplier code of conduct, fair treatment of suppliers, donations/sponsorships, handling of confidential/inside information, personal data governance, anti-trust compliance, workplace safety and accuracy of financial records. All audit findings are reported to the Audit Committee and the Executive Directors, and they are also shared with external auditor.

Whistleblowing

To maintain high standards of business integrity, honesty, fairness, and transparency, the Group has developed a Whistleblowing Policy and established confidential reporting channels for employees and third parties. This policy addresses all forms of impropriety, misconduct and malpractice, including but not limited to criminal offenses, discrimination, harassment, environmental damage and violations of legal or regulatory requirements, as well as breaches of the Group's rules, policies or internal controls.

All 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 the Company's website and intranet, providing detailed information about the reporting process and procedures.

The Group places a high priority on maintaining confidentiality throughout the investigation process and protecting whistleblowers. The identity of the whistleblower will remain confidential unless consent is given. Any harassment or victimisation of a whistleblower will be considered as misconduct and may lead to dismissal or other disciplinary actions.

Data Privacy and Cyber Security

Information security and personal data privacy are fundamental pillars of the telecommunications industry and are significant topics prioritised by the Group. The Group has developed policies for personal data governance and information security to ensure the confidentiality, integrity and availability of its information while protecting personal data in accordance with relevant data protection laws. Additionally, the Group has implemented a governance structure to oversee matters related to information security and personal data privacy within the Group.

During the Reporting Period, the Group did not violate any relevant laws and regulations regarding consumer data protection and privacy.



Security measures are implemented to prevent the unlawful processing, accidental loss, destruction or damage of personal data.

Personal data governance and information

The protection of personal data privacy is overseen by the Regulatory Advisory Committee, which includes the Chief Executive Officer and senior executives from the legal and corporate security departments, supported by the Data Protection Committee and local implementation teams. Employees are required to collect personal data in a lawful, fair and transparent manner, adhering to the data protection laws applicable in their jurisdiction.

Personal data must be collected solely for specified, clear and legitimate purposes, and measures should be taken to ensure that the data is accurate and up-to-date. Employees are expected to handle personal data lawfully, fairly, and transparently, ensuring compliance with relevant data protection laws. Access to personal data is restricted to employees whose roles necessitate its use for job responsibilities.

All personal data will be deleted when it is no longer necessary. For instance, customer personal data provided through application forms, the internet, or other means will be erased two years after the termination of the service subscription. Individuals have the right to access or amend their personal data. Security measures, such as pseudonymisation and encryption, are implemented to prevent unlawful processing, accidental loss, destruction or damage. The Group also conducts privacy impact assessments for new products, technologies, and business operations to meet regulatory requirements and manage privacy risks. The use of personal data by third parties is closely monitored, with access granted on a "need-to-know" basis.

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

The Group periodically reviews and updates its policies to facilitate timely communication with employees. To acknowledge and confirm their compliance with all applicable Group policies, employees are required to submit an annual self-declaration. This reinforces employees' commitment to upholding the Group's policies and regulatory requirements.

Cyber security strategy and performance

The Group has implemented an information security framework that outlines specific roles and responsibilities, including those of the Head of IT Security and Compliance, Information Security Custodian, and Information Owner.

Roles	Responsibilities
Head of IT Security and Compliance	 Manage the development, deployment and maintenance of the Group's information security policies Establish an information security culture across the Group Monitor external and internal information security trends
Information Security Custodian	 Each business unit needs to establish its information security custodian and its responsibilities include: Provide information security education and training Deploy the methodologies, processes and risk management and reviewing the effectiveness of the measures Assist business unit management to establish an effective response plan to handle information security incidents Implement reporting procedures in business units
Information Owner	 Determine the authorisation and information handling process Take appropriate controls in storage, handling, distribution and regular usage of information Provide available information to relevant personnel on a need-to-know basis

To maintain high IT quality and identify potential vulnerabilities in the network, the Group conducts annual network assessments and penetration testing for both web and mobile applications. The results of these assessments are submitted to internal audit assurance for review as necessary.

Data security and protection

The Group has limited the use of corporate information and put in place appropriate security measures based on the value and sensitivity of the information, with access only granted to those with clear business justifications. Each business unit is required to develop an information security incident response plan that outlines the personnel responsible for addressing incidents, the communication processes with both internal and external stakeholders, and the technological tools and resources utilised to identify and recover compromised data. In the event of an incident, details regarding any compromised or potentially compromised data, along with the steps taken to address the situation and the resolution process, must be reported to relevant parties, including the Legal & Regulatory Affairs Department, Information Owner, Information Security Custodian, and any affected business units within the Group.

The Group has also created operational continuity and contingency planning, requiring business units to develop business continuity plans that ensure the confidentiality, integrity and availability of information during security incidents. Policies, standards and guidelines for data and information backup and recovery have been implemented to ensure data is backed up regularly. All storage media must be carefully stored and organised, and any recovery efforts should be requested beforehand and conducted under supervision. Additionally, data backup restoration tests and validations are mandated annually.

Cybersecurity awareness communications

Recognising the increasing prevalence of phishing emails and cybercrime, it is essential for the Group's employees to stay vigilant and keep up with the latest regulations and technological advancements in cybersecurity. During the Reporting Period, the Group initiated cybersecurity awareness training for all employees, both full-time and part-time, through a third-party training agency. This online training equips employees with the knowledge and skills needed to safeguard personal and sensitive company

information from online threats. The cybersecurity awareness course covers various topics, including password management, and requires employees to complete an online assessment to ensure they understand the material.

In addition to the online cybersecurity training, the Group conducted an ethical phishing email campaign during Cybersecurity Awareness Month to assess employees' awareness of phishing threats. Throughout the campaign, the Group randomly dispatched simulated phishing emails to its employees. If employees click on any content in these fake emails, they will be required to retake the cybersecurity awareness training.



The Group provides employees with cybersecurity awareness training, equipping them with the skills needed to safeguard sensitive information from online threats.

Labour and Human Rights

The Group adheres to and has developed labor and human rights policies aligned with the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights. The Group has created a Human Rights Policy, a Statement on Modern Slavery and Human Trafficking and a Code of Ethics. In addition to integrating these into its operations, the Group also ensures compliance from its suppliers throughout the supply chain. Below are the key elements of these policies:

Policies	Commitment of the Group
Human Rights Policy	 The Group upholds and advocates workforce diversity and inclusion, committing to equal opportunity and zero tolerance for discrimination and harassment in any form. Recruitment, training, compensation and career advancement within the Group are based on qualifications, performance, skills and experience. Unfair treatment, inappropriate behavior, retaliation and any form of misconduct will not be accepted. (For more detailed information, please refer to the "Inclusion and Diversity" section.)
Modern Slavery and Human Trafficking Statement	 The Group is dedicated to preventing any form of slavery and human trafficking within its operations and supply chain. The Group will act ethically to establish effective systems and controls aimed at eliminating slavery and human trafficking from its practices and supply chain.
Code of Ethics	 The Group prohibits all forms of discrimination and ensures equal opportunities for all employees in hiring, compensation, training, promotion and other employment terms. The Group values honesty, courtesy, adaptability, respect for individuals, personal dignity and privacy, actively promoting these principles among its employees. The Group maintains a zero-tolerance policy for harassment and will impose strict disciplinary measures on offenders, including termination of employment.

Supply Chain Responsibility

Business partners and suppliers play a crucial role in the Group's journey towards sustainability. In view of this, the Group has integrated sustainability principles into its procurement process. The Group has established Supplier Code of Conduct, Acknowledgement of Supplier Code of Conduct, Sustainability Questionnaire, Guidance on Environmental Protection and Occupational Health and Safety Standards, and a Business Partner Evaluation process. Recognising the importance of supplier engagement, the Group continually strives to strengthen its collaboration with business partners and suppliers. During the Reporting Period, the Group distributed CDP questionnaires to selected business partners and suppliers to understand their carbon emission and sustainability performance. This initiative enhances the Group's carbon measurement across the value chain and facilitates better tracking of the progress in its carbon reduction efforts.

Supplier code of conduct

The Group has established the Supplier Code of Conduct which serves as a guide for its business partners and suppliers, aiming to foster broader enhancements in sustainability practices and performance for the interests of stakeholders concerned as well as communities served by the Group. The Supplier Code of Conduct has been developed taking into consideration various international charters and conventions, such as the United Nation's Universal Declaration of Human Rights and the International Labour Organisation Conventions. It outlines standards specifically for the Group's business partners and suppliers, encompassing specific criteria and benchmarks regarding environmental performance, ethics, health and safety, quality and regulatory compliance.

The Supplier Code of Conduct alongside the Purchasing Policy, Business Partner Evaluation Policy, Anti-Fraud and Anti-Bribery Policy as well as other related controls and procedures, provides clear direction and guidelines in terms of the Group's evaluation and engagement with its business partners and suppliers. The Group regularly conducts adequate assessments and evaluations for the selected business partners and suppliers involved. Compliance with the Supplier Code of Conduct is mandatory for those falling within the scope of the Business Partner Evaluation Policy.

The Group encourages its suppliers to regularly evaluate their own compliance as well as that of their business partners and their suppliers, and to share their compliance status with the Group upon request. If any violations of this Supplier Code of Conduct are identified, the Group will work with them to address the issue. The Group expects the affected business partners and suppliers to create a corrective action plan to achieve compliance with the Supplier Code of Conduct. If they fail to develop or implement this plan, the Group may terminate the business relationship.

Supplier screening and assessments

The Group has invited 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 form part of the supplier evaluation process.

Following the Group's introduction of the ISO management system in designated locations, the Group has actively engaged with its suppliers to facilitate the implementation of similar systems or acquisition of related certifications. During the Reporting Period, the Group has 666 suppliers and 326 of them were evaluated.

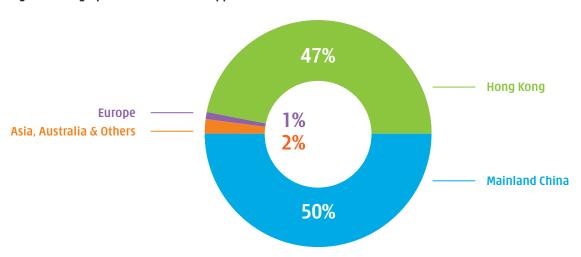


Figure 9: Geographic Distribution of Suppliers

Sourcing guidelines

The Group supports the use of environmentally preferable products and collaborates with its business partners and suppliers to promote corporate social responsibility. As part of its sustainability strategy, the Group has included relevant action points in its Supplier Code of Conduct, requiring business partners and suppliers to minimise energy usage and carbon footprint in their operations. The Group also encourages the use of environmentally friendly, recycled, and sustainable products and technologies.

To minimise the use of plastic and promote a circular economy, the Group has stopped using plastic packaging for most of its prepaid SIM cards, opting instead for naked packaging. Since 2023, the Group has launched the EcoSIM card programme to promote the use of environmentally preferable products. EcoSIM cards are manufactured by suppliers using 100% recycled plastic that is certified as a carbon-neutral product. The Group will continue to engage and collaborate with its business partners and suppliers to explore sustainable options and products, contributing to a more sustainable future for the next generation.

Sustainable Business Model & Innovation

The Group's operations significantly impact the daily lives of millions by providing mobile multimedia telecommunications channels. The Group is committed to creating and enhancing value for its stakeholders by proactively and continuously adapting to social, environmental and market dynamics. The Group's dedication to safeguarding customer interests is reflected in its exceptional service delivery. In the face of complex challenges, the Group's core businesses remain focused on fostering innovation and collaboration to mitigate risks and seize opportunities related to sustainable development. This includes efforts to build resilience to climate change, promote digital inclusion and encourage sustainable lifestyles.

Group Goals

 Offer customers sustainable products and invest in and embrace innovation to achieve transformational impact

Mapping to the UNSDGs







Content in this Section

- Service Excellence
- Digital Inclusion
- Climate Resilient Business
- Customer Data Privacy and Protection
- Customer Service Satisfaction

Service Excellence

The Group strives to be a top-notch digital provider enabling Hong Kong as a smart city with state-of-the-art technology and excellent service. The Group explores how telecommunications technology can be applied in Hong Kong across different scenarios and sectors to deliver products that fulfill its customer needs and promote technological advancement in the market and society. Furthermore, the Group focuses on enhancing customer experience and gathering feedback, ensuring that the quality of its services and products meets its customers' expectations.

The Group also integrates the idea of climate resilience into business operation. For more details, please refer to the "Climate-related Risk, Opportunities, and Action Strategy" in the Environmental Section.

ISO integrated management system

The Group has maintained various management systems to improve environmental and occupational health and safety performance. ISO 14001:2015 Environmental Management Systems and ISO 45001:2018 Occupational Health and Safety Management Systems ("OHSMS") guide the Group's business units to perform their daily operations in a consistent and reliable manner by establishing and administering a set of robust processes and procedures incorporating management reviews. Since 2022, the Group has started implementing integrated management systems, covering network design, installation and maintenance operations in designated locations, in a bid to provide additional assurance for customers and business partners.

ISO 14001:2015 requires the implementation of policies that mitigate the adverse environmental impacts throughout the lifecycle of products and services. The Group remains committed to striking a balance between commercial operations and environmental preservation, with a view to minimising the carbon footprints of its business activities. The Group has established environmental policy, conducted awareness-raising campaigns, and provided adequate trainings to address the identified risks and compliance obligations and to adopt the best trade practices for managing significant environmental aspects. The Group strives to promote recycling, resource conservation and a paperless office which has been proven to be effective in reducing pollution and optimising resource utilisation. As far as procurement is concerned, the Group has regarded the environmental requirements as a selection criterion for its business partners. For more information about ISO 45001:2018, please visit the section on "Occupational Health and Safety Risk Management and Risk Mitigation".

Customer experience

The Group fully adheres to the Code of Practice for Telecommunications Service Contracts, developed by the telecommunications industry in collaboration with the Communications Association of Hong Kong. The Group proactively engages with its customers and consistently strives to enhance its service quality to improve customer satisfaction and foster strong mutual trust, which helps strengthen its brands.

The Group continuously aims to offer its customers a broader range of services and convenient ways to interact. The Group has established multiple communication channels, including customer service centers, social media platforms, live web chat, email, its website and mobile applications. During the



Retail staff proactively engages with customers to improve customer satisfaction.

Reporting Period, the Group introduced a new WhatsApp channel to enhance customer service communication. The Group's website and applications have long served as essential tools for building customer relationships. They not only provide the latest updates and information but also allow customers to manage call time and data usage, pay bills, access roaming services, purchase handsets and accessories, and make top-ups. Customers can also reach out through the Group's online customer service platform.

The Group's premium brand "SUPREME" offers exclusive benefits through exceptional communication services and tailored experiences, encompassing culture, entertainment, dining and leisure activities for its high-spending customers. SUPREME also delivers enhanced network usage priority and resources, allowing customers to enjoy a new digital lifestyle with faster and more reliable services. To further elevate its customer service experience, SUPREME has launched the "Dedicated Personal Executive Service" for Diamond customers, delivering personalised assistance with contract renewals and a range of services through seamless and attentive support.

Customer relationship management

The Group has implemented the Customer Feedback Management Policy and established multiple channels for customers to share their feedback, including a 24/7 hotline, email, an online enquiry form and a mailing address. The Group's goal is to offer convenient and effective feedback options, providing thoughtful solutions to its customers.

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

Figure 10: The Group's Performance Pledge - Customer Complaint Handling

Target	Parameter	General description	Performance target	2024 Actual performance
Customer Complaint Handling	Complaint Acknowledgement ⁽⁵⁾	The mean time to acknowledge a complaint, counting from the time the complaint lodged by a customer	95% within one working day	100%
Customer Complaint Handling	Complaint Resolution Time ⁽⁵⁾	The mean time to provide the first resolution to a customer within five working days	90%	94%

Intellectual property protection

The Group is committed to safeguarding intellectual property rights and has incorporated the relevant requirements and information into its cybersecurity policy and standards during the Reporting Period. The Group recognises the significance of protecting intellectual property and adheres to relevant policies and regulations. Each business unit is required to implement appropriate procedures and measures that ensure compliant use of intellectual property in the operations, thereby safeguarding the Group's intellectual property rights and products. Additionally, the use of software across business units is monitored to prevent any infringement of intellectual property rights, and necessary remedial actions will be taken if any issues arise.

During the Reporting Period, the Group did not violate any relevant laws and regulation regarding intellectual property rights.

Quality checking and assurance

The Group is dedicated to delivering innovative, fast, and secure technology and network services that meet both customer needs and relevant statutory and regulatory requirements.

The Group 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. This ensures that the Group delivers stable and reliable services to its customers.

Note:

⁽⁵⁾ General complaints do not include scenarios where the relevant customer is not reachable or when the information and/or supporting documents provided by the customer are insufficient to carry out trouble-shooting. Testings which require on-site testing or joint testing with other service providers or contractors are also excluded.

Figure 11: The Group's Performance Pledge - Network Availability and Service Restoration

Target	Parameter	General description	Performance target	2024 Actual performance
Network availability ⁽⁶⁾	Availability of the core network	Percentage of the uptime of the core network in an observation period	99.99%	100%
Service Restoration ⁽⁶⁾	Time to repair	The mean time to recover a fault in the core network	95% within 10 minutes	100% within 10 minutes

Marketing practices and advertising

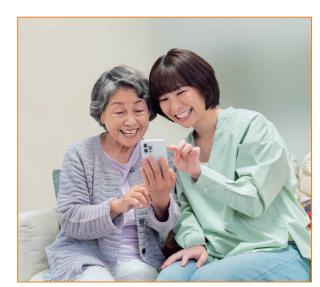
The Group has established standards and procedures to ensure external communications including marketing materials and messages are accurate, current, consistent, and compliant with intellectual property rights. Depending on the sensitivity and importance of the messages, social media posts, in-base materials, e-newsletters and advertising are reviewed and approved by relevant management including the Chief Executive Officer according to the Group's Corporate Communications Policy. During the Reporting Period, the Group did not violate any relevant laws and regulations regarding advertising and labelling.

Digital Inclusion

Anti-scam service

The Group remains committed to providing secure mobile and network services for its customers. The Group has implemented personal privacy and cybersecurity protection standards (for details, please refer to the section "Data Privacy and Cyber Security") to safeguard the information managed by the Group and the networks used by its customers. Recognising the growing demand for security services to defend customers against fraud and third-party attacks, the Group has introduced various security service packages, including anti-phishing, call blocking of fraudulent calls, antiscam call services and digital footprint concealment enabled.

In response to the need for an anti-phishing solution, the Group offers ZoneAlarm services from Check Point Software Technologies to detect malwares, and protect users' critical personal data on devices. These value-added services provide customers with more personalised options to protect them from scams.



Customers aged 60 or above enjoy the "Incoming Calls Management Pack" for free, which helps them identify and block scam and nuisance calls.

Note:

(6) The target does not apply to interruptions due to scheduled or emergency network maintenance and upgrade, as well as circumstances beyond the Group's reasonable control. In 2023, the "Incoming Calls Management Pack" was launched, combining two services – "Anti-scam" and "Call Block". This package helps customers identify and block scam and nuisance calls, supporting the Office of the Communications Authority ("OFCA") and Hong Kong Police Force in their efforts to combat phone scams. The service allows users to create a call blacklist to block unknown numbers, reducing the likelihood of being disturbed or deceived by scam calls. During the Reporting Period, the Group expanded this service to include customers aged 60 and above, further broadening its reach to protect senior citizens from scams and unnecessary disturbances while using mobile services.

The Group has established a robust framework for data privacy and cyber security to safeguard our customers' privacy, For more details, please refer to the "Data Privacy and Cyber Security" in the Governance section.

3Education

The Group is excited to introduce advanced mobile technology that supports digital inclusion and social development across all sectors, in particular the potential of 5G to transform education. By integrating 5G with technologies like artificial intelligence ("Al"), virtual reality ("VR"), augmented reality ("AR") and robotics, the Group empowers schools and educators to facilitate technology-driven self-learning for the new generation. This is showcased in DIGIBox, the Group's 5G solution hub launched in 2023, which hosts visits by educational institutions and students, where they can engage in its interactive programmes to experience the transformative power of 5G and learn more on emerging fields like robotics solution and Al.

Business-school Partnership Programme



Kowloon True Light School, a participant in the Group's Business-School Partnership Programme, visited the DIGIBox 5G solution hub in 2024. The visit offered an immersive experience highlighting 5G capabilities through demonstrations of innovative applications across different sectors. This was followed by a workshop on ChatGPT and digital drawing, designed to introduce AI concepts and spark interest in innovation and creativity among the youth.

During the Reporting Period, the Group continued its collaboration with the Spanish School of Hong Kong to provide a complete 5G mobile network coverage for the entire campus, exemplifying its commitment to create a truly smart campus that enhances educational experiences and fosters innovation.

Environment

The impact of extreme weather events, such as super typhoons and flooding, has intensified in recent years due to climate change, disrupting supply chains and business operations. These climate variations pose risks to the Group's assets, leading to physical damage and financial losses, while also presenting additional challenges for stakeholders. In addition, governments worldwide are pursuing low-carbon economies by enacting legislation to limit emissions and offering incentives for environmental protection. The Group strives to align with the goals set out in to the 2015 Paris Agreement of limiting global warming to below 2 degrees Celsius, ideally below 1.5 degrees Celsius, and achieving net-zero GHG emissions by 2050, through innovations in energy efficiency and resource management.

Group Goals

- Take action on climate change
- Protect natural resources
- Promote a circular economy

Content in this Section

- Climate Action
- Decarbonisation
- Circular Economy

Mapping to the UNSDGs















Climate Action

Climate action strategy

The Group is dedicated to actively contributing to the transition to a low-carbon global economy and aims to contribute positively to combating climate change. In 2024, the Group made notable progress in several areas to deliver sustainable business and solutions strategies. These areas are outlined on the next page.

Figure 12: Climate Strategies

Initiatives	Strategies
Energy efficiency	 Continue to explore options for enhancing energy efficiency including radio equipment modernisation, base stations reconfiguration from indoor to outdoor and AI energy-saving technology adoption Continue to improve energy efficiency in heating, ventilation and air conditioning systems Embrace digitalisation and implement an energy management system to support a green office Continue to promote innovation in Internet-of-Things ("IoT") applications and smart city solutions enabled by 5G connectivity
Circular economy	 Reduce, reuse and recycle all forms of waste Embed circular economy principles into products manufacturing Engage customers in retail recycling campaigns
Finance and investment	Continue to manage capital expenditure towards a net-zero pathway
Supply chain engagement	 Monitor suppliers' and business partners' contributions to the Group's scope 3 emissions Keep track of the sustainability performance and carbon emissions of key suppliers

Environmental management

The Group is dedicated to environmental stewardship and implements a range of practices and policies to govern, monitor and assess its environmental performance, with the Sustainability Committee responsible for reporting findings and making recommendations to the Board on environmental matters. The Sustainability Committee delegates responsibilities to the Sustainability Working Group, which oversees the Group's environmental actions and goals. Comprising senior management, the Sustainability Working Group is tasked with developing, discussing and evaluating the environmental performance of various departments and teams across the Group.

Additionally, in accordance with the requirement of ISO 14001:2015, the Group has internal procedures to address environmental aspects in network design, installation and maintenance operations to minimise impacts to the environment.

During the Reporting Period, the Group did not violate any laws and regulations related to environmental protection and biodiversity protection.

Energy efficiency

The Group has incorporated environmental factors into multiple facets of its operations by implementing energy efficient initiatives and energy management systems. Given that most of its electricity consumption comes from network facilities, the Group is dedicated to reducing carbon emissions by enhancing the energy efficiency of its mobile network.



Environmental factors are incorporated into the Group's operations through the implementation of energy-efficient initiatives and energy management systems.

Additionally, the Group implemented strategies to reduce energy consumption and collaborated with enterprises to adopt technologies such as IoT to lower electricity usage and improve heating, ventilation and air conditioning ("HVAC") efficiency. It has leveraged 5G and IoT technology to minimise energy waste. During the Reporting Period, a 5G-based IoT solution that models energy use in chiller plants at shopping malls was introduced, enabling the chiller performance to be optimised and operated under ideal conditions, thereby reducing overall energy consumption.

Figure 13: Sustainable Energy Efficiency Practices

Initiatives	Description
Network operation advancements	Energy-efficient practices have been implemented across the network operations to reduce consumption, including the installation of high-efficiency all-weather base station equipment at new outdoor sites, reconfiguring select base stations from indoor to outdoor locations to take advantage of natural cooling, and minimising air conditioning use at existing sites.
Green office	Throughout the offices, the Group has implemented Building Management System ("BMS") to optimise cooling and lighting usage. The Group has adjusted the schedule for air conditioning and lighting activation to delay their switch-on, and introduced remote control capabilities to allow for manual adjustments during special circumstances, such as a typhoon. Up to the end of 2024 the Group has also replaced over 98% of fluorescent tubes with Light Emitting Diode ("LED") energy-saving tubes company-wide. For chiller units, the Group will continue to replace high-efficiency chillers in the office according to business needs.
Electric vehicle adoption	The Group is actively working towards transitioning to a more sustainable fleet by gradually expanding its electric vehicle pool to replace ageing gasoline cars.
Chiller replacement	Mechanical ventilation and air conditioning ("MVAC") systems are a key contributor to the Group's energy consumption. To address this, the Group has regularly upgraded the chiller systems in the office and base stations to enhance cooling efficiency, enabling energy usage reduction while maintaining optimal performance.
Al technology adoption	The Group is employing intelligent energy-saving solutions in the base stations to enhance energy efficiency. In 2024, the Group signed a memorandum of understanding ("MOU") with Huawei International Company Limited to collaborate on a 5.5G green strategy. By implementing Al-driven energy-saving solutions, the base stations automatically switch to a smart energy-saving mode during low traffic periods, reducing energy consumption while maintaining superior customer service.

Climate-related risk, opportunities and action strategy

The Group has identified potential risks and opportunities associated with climate change, together with relevant strategies including risk mitigation measures and methods to seize these opportunities. The table below summarises the Group's climate change risk and opportunity profile.

Figure 14: Climate-related Risks and Opportunities Analysis

Risk Title	Type of Risk	Risk Description	Financial Impact	Response
Increased intensity, duration and frequency of extreme weather events	Acute physical risk	Damage to telecommunications infrastructure, customer service premises, retail shops and premises for outsourced service (e.g. call centres) due to extreme weather events (such as typhoons and rainstorms), the subsequent service interruption and detrimental impact on customer retention and revenues.	Increased operating costs	The Group deployed a checklist for extreme weather condition procedure to expedite cell site recovery following extreme weather events. Additionally, its network specialists closely monitored network continuity and alerts through the real-time GIS mapping system, ensuring prompt resolution of network and system issues.
Increased intensity, duration and frequency of flooding	Acute physical risk	Damage to telecommunications infrastructure, customer service premises, retail shops and premises for outsourced services (e.g. call centres) due to increased flooding,the subsequent service interruption and detrimental impact on customer retention and revenues.	Increased operating costs	The Group deployed a checklist for extreme weather condition procedure to expedite cell site recovery following extreme weather events. Additionally, its network specialists closely monitored network continuity and alerts through the real-time GIS mapping system, ensuring prompt resolution of network and system issues.
Increased regulatory requirements	Transition risk – policy and legal risk	Implementation of stringent policies and regulation by regulatory bodies and HKEX concerning climate change.	Increased operating costs	Develop a roadmap for adopting new international disclosure standards in order to mitigate potential cost escalation resulting from time constraints.

Risk Title	Type of Risk	Risk Description	Financial Impact	Response
Customer preferences shifting away from companies with lower climate related performance	Transition risk – reputation risk	Shifting customer preferences and priorities meaning that an approach to climate change that is seen as insufficient (including failure to meet public commitments, e.g., Net Zero by 2050 from Hong Kong's Climate Action Plan 2050) will severely impact the Group's social licence to operate.	Loss of market share	The Group continues to deploy energy-saving solutions to address the growing demand for carbon reduction in operation. Continue to enhance external communication to effectively demonstrate the Group's dedication to ESG-related issues.
Investor Preferences shifting away from companies with lower climate related performance	Transition risk - reputation risk	Shifting investor preferences and priorities meaning that an approach to climate change that is seen as insufficient (including failure to meet public commitments, e.g., Net Zero by 2050 from Hong Kong's Climate Action Plan 2050) will severely impact the Group's social licence to operate.	Reduced accessibility to capital from these investors and increased costs of capital	The Group continues to deploy low-carbon solutions to address the growing demand for carbon reduction in operations. Continue to enhance external communication to effectively demonstrate the Group's dedication to ESG-related issues.
Transition to low emission technology	Transition risk - technology risk	Transition to low carbon, energy technology may require more research and costs.	Increased operating costs	The Group's major telecom suppliers have committed to achieving net-zero emissions. The Group will collaborate with them to transition to low-emission technology.

Opportunity Title	Type of Opportunity	Opportunity Description	Financial Impact	Response
Development of innovative 5G services focused on climate-related solutions	Markets opportunities	Offering 5G technology solutions aimed at mitigating and adapting to climate change, including flood detection solution, energy-saving IoT devices, and electric vehicle chargers, enhancing community resilience.	Increased revenue and profit	3Business is committed to providing state-of-the-art 5G solutions that address climate change challenges and enhance community resilience.
Use of low emission technology	Energy source opportunities	Adoption of energy-saving and low carbon energy options to enhance sustainability performance and reduce GHG emissions.	Costs reduction	The Group is dedicated to collaborating with its suppliers to explore and implement low-emission technologies in operation and network equipment for energy saving.

Electric vehicle charging solution

Recognising the growing awareness of climate change mitigation and the increasing popularity of electric vehicles, the Group has capitalised on these opportunities by creating a smarter and more innovative electric vehicle charging solution. By integrating 5G technology into the charging system, users can monitor charger status and make payments through a designated app. The high-speed, low-latency capabilities of the 5G network not only enhance the existing technology but also support energy conservation and environmental protection efforts.



■ The Group offers a cutting-edge 5G electric vehicle charging solution.

Decarbonisation

GHG emissions reduction targets

The Group is a member of CKHGT, which includes the telecommunications business units of **3** Group Europe, along with those in Hong Kong and Macau. The relevant business units hold regular meetings to advance climate-related initiatives and expedite transitions while establishing emission reduction targets and sharing best practices.

In addition to reporting its scope 1 and scope 2 GHG emissions, the Group is actively engaged in CKHGT's initiatives to enhance its scope 3 GHG emissions reporting. The Group is working towards integrating scope 3 emissions reporting.

During the Reporting Period, the Group participated in CKHGT'S EU Corporate Sustainability Reporting Directive disclosure project, providing financial and impact-related data along with feedback to assist in their double materiality assessment.

Regarding sustainability-related data consistency and transparency, the Group also participated in CKHGT's 2023 limited data assurance audit conducted by KPMG, demonstrating the Group's commitment to maintaining high standards in sustainability disclosure.

Science-based Emissions Reduction Targets



CKHGT has established absolute short-term targets for its scope 1, 2 and 3 GHG emissions, which were validated by the SBTi in 2022. The target for achieving net-zero emissions is currently awaiting validation by the SBTi. These targets include:

- Reduce absolute scope 1 and 2 GHG emissions by 50% by 2030, from a 2020 baseline
- Reduce absolute scope 3 GHG emissions by 42% by 2030, from a 2020 baseline
- Reduce absolute scope 1 and 2 GHG emissions by 90% by 2050, from a 2020 baseline.
- Reduce absolute scope 3 GHG emissions by 90% by 2050, from a 2020 baseline.

In alignment with CKHGT's reduction targets, the Group will continue to explore a range of strategies and initiatives to support the achievement of these goals.

Environmental targets

The Group is committed to advancing sustainability and reducing its environmental impact by establishing environmental targets for KPIs related to material topics.

	Environmental Targets	Progress
Emissions	Reduce annual GHG emissions per TB of data traffic (kgCO $_{\!2}e$ per TB) by 2%	Achieved in 2024
	Reduce GHG emissions $^{(7)}$ per TB of data traffic (kgCO $_2$ e per TB) by 70% by 2025 and 90% by 2030 versus a 2020 baseline $^{(8)}$	On track
	Reduce the annual growth rate in electricity consumption by 30% by 2030 versus a 2022 baseline	On track
Paper ⁽⁹⁾	Reduce annual paper usage by 2%	Achieved in 2024
	Reduce paper usage by 60% by 2030 versus a 2018 baseline	On track
	Reduce annual printing paper usage by 2%	Achieved in 2024
	Reduce printing paper usage by 20% by 2030 versus a 2022 baseline	On track
Waste	Achieve a recycling rate of 35% for general office waste produced by the Hong Kong operation by 2030	On track

Notes:

- (7) Limited to Scope 2 to better reflect the actual situation, as GHG emission of data traffic is related to the electricity usage only.
- (8) Restatement of GHG emissions baseline from 2022 to 2020 to align with CKHGT's absolute near-term SBTi reduction targets.
- (9) Since the previous targets were fulfilled in 2024, the Group has established new and more aggressive targets.

Natural Resources Protection

The Group is committed to preserving valuable natural resources and conserving biodiversity, and this is encompassed in its biodiversity policy established in 2023. The Group pledges to conduct business activities in a responsible and sustainable manner, actively preventing pollution of land, water and air while protecting biodiversity, also supporting biodiversity conservation and environmental protection initiatives in its communities. During the Reporting Period, the Group implemented several biodiversity conservation and energy-saving initiatives.

Earth Hour - Give an hour for Hutchison Telecom Tower



In support of WWF Earth Hour 2024, the Group initiated the "Give an Hour for Hutchison Telecom Tower" campaign where non-essential lights were switched off from 1-2 pm on 22 March 2024. This initiative encourages employees to participate for one hour in energy saving and raise awareness of environmental issues affecting our planet.

VeggieLab

VeggieLab, the Group's rooftop organic farm, offers green spaces where staff can stop to smell the flowers and have the opportunity to learn to grow vegetables. Beyond promoting environmental greening and reducing carbon emissions, the initiative supports employees' work-life balance, enabling them to enjoy nature and the pleasures of farming while at work. It also encourages employees to appreciate food and reduce food waste.



The Group is dedicated to safeguarding and conserving water resources, and aims to ensure responsible water management and encourage sustainable water consumption behaviours.

Circular Economy

The Group has fully integrated the concept of "circular economy" into its business operations, reflecting its commitment to sustainability and resource efficiency. Throughout the Reporting Period, a range of recycling and waste reduction initiatives were launched to minimise the Group's environmental impact and promote responsible consumption.

The Group's efforts were recognised by the Good Level Wastewi\$e Certificate from the Hong Kong Green Organisation Certification.

Reduce, reuse and recycle

During the Reporting Period, the Group initiated several Reducing, Reusing and Recycling (3Rs) projects to promote waste minimisation and enhance resource efficiency across its operations.

Initiatives	Details
Recycling of <i>Lai See</i> packets and Mooncake boxes	During the campaign, used <i>Lai See</i> packets and mooncake boxes were collected, which were then processed by an NGO for either reuse or recycling.
Green Office	The Group has incorporated the principles of reducing, reusing and recycling into the daily operations by establishing a recycling corner in the office to collect metal, plastic and beverage cartons, as well as reusing single-sided printer paper trays.
Plastic-free July	The Group promoted Plastic-free July to encourage employees to minimise their use of plastic.
Product Innovation	The ECO SIM card, made entirely from 100% recycled plastic, was launched in 2023.

Focus on e-waste

To ensure proper recycling of e-waste, the Group has participated in the Green Friends initiative, led by Hong Kong Battery Recycling Centre Limited, starting from 2023. All disposed lead-acid batteries from the Group's network sites in Hong Kong were delivered to the facility for further processing and responsible recycling, ensuring compliance with environmental regulations. In 2024, the Group successfully recycled 21 tonnes of damaged or aged lead-acid batteries.

Customer engagement in circular economy

To engage its customers in the circular economy efforts, the Group continues to provide one-stop handset recycling services in selected 3Shops that promote the recycling of used mobile phones and accessories. Collected items are then forwarded to the Computer and Communication Products Recycling Programme run by the government, in collaboration with industry partners and voluntary organisations. Electronic devices in good working condition are refurbished and donated to those in need, while other components and materials are recycled to minimise waste. During the Reporting Period, 1,225 pieces of electronic devices were collected from customers through this service.

Social

The Group is committed to creating shared value for stakeholders to foster strong relationships and establish a competitive advantage that underpins its long-term prosperity. By providing outstanding employment experiences, the Group aims to cultivate an excellent work environment for its workforce of over 1,000 employees across Hong Kong and Macau. Beyond outlining its sustainable development strategy, the Group actively promotes and supports the implementation of tailored human resource management strategies that meet the specific needs of its business operations.

Group Goals

- Create great places to work
- Invest in developing thriving and resilient communities

Content in this Section

- Talent attraction
- Employee engagement
- Learning and development
- Inclusion and diversity
- Health, safety and wellbeing
- Community investment

Mapping to the UNSDGs















Talent Attraction

Creating Great Places to Work - Recognition Received in 2024



Awarded the Asia's Best Employer Brand in the 15th Asia's Best Employer Brand Awards organised by Employer Branding Institute and World HRD Congress & Star of the Industry Group.

Attracting young talent

The Group recognises the value of its human capital and are committed to ensuring an equitable, harassment-free and discrimination-free workplace that is both ethical and safe for employees. To uphold these principles, the Group has established several key policies, including Human Rights Policy, Health and Safety Policy, Modern Slavery and Human Trafficking Statement and Code of Ethics. The Group maintains a zero-tolerance stance against child labour, forced labour and any forms of modern slavery.



The Graduate Trainee Programme and the Management Trainee Programme help nurture fresh talent for the company

In 2024, the Group continued the Graduate Trainee Programme to nurture young talent by providing graduates with the opportunity to engage in diverse responsibilities and gain hands-on experience through job rotations.

In addition, the Management Trainee Programme was offered for young graduates, providing opportunities for accelerated career progression through knowledge sharing, skill development and exposure to best practices. These interactions help communicate the Group's vision and ignite a passion for the telecommunications industry while fostering open communication.

The Group also offers internships to undergraduates eager to pursue careers in telecommunications, providing them with valuable practical experience and commercial awareness through involvement in various business projects.

Employment conditions and benefits

The Group strictly adheres to all applicable laws and regulations in the jurisdictions where the Group operates, ensuring that these are clearly communicated to employees through the intranet. Child and forced labour are strictly prohibited in the Group's business operations. During the Reporting Period, the Group did not violate any laws and regulations relating to child labour and forced labour.

To guarantee equal opportunities for all candidates, the Human Resources Department conducts interviews with a diverse range of applicants during the recruitment process. Factors such as age, race, gender, religion will not lead to unfavourable treatment or discrimination. Upon employment, the Group provides not only a basic remuneration and benefits package that complies with labour laws in its operating jurisdictions but also performance-linked incentives and allowances to employees. Details regarding remuneration package and conflict of interest are outlined in the employment contracts and the employee handbook.

Full-time employees are entitled to various leave benefits, in addition to statutory holidays. To encourage work-life balance for its employees, the Group has implemented significant enhancements to employees' annual leave entitlement. The Group also offers a range of competitive benefits for employees, including medical insurance with online general practitioner consultation services and additional panel doctors services, shopping discounts, shuttle bus services and free staff SIM plans. To enhance its pay-for-performance culture, the Group conducts an annual salary review to support talent retention and ensure competitive employee remuneration.

Employee Engagement

The Group values employee feedback and strives to foster a harmonious relationship with staff. To facilitate internal communication, the Group has created an internal communications channel called "JoMeh" to feature highlights of employee activities, updates on corporate information, employee contributions, sustainability initiatives and employee benefits.

To foster a thriving work environment, the Group has organised diverse activities, including community volunteering and athletic classes, to support a healthy work-life balance and instill purpose among staff. During the Reporting Period, the Group offered yoga classes for employees to promote well-being and strengthen team bonds, alongside various benefits and training programmes.

In 2024, the Group continued to organise the Town Hall Meeting to further enhance internal communication. Leaders from different departments can interact and exchange ideas and gain insights with senior management, while management also shared important updates, strategic plans and future Group-wide initiatives at this meeting. By prioritising employee engagement through this event, the Group cultivates a stronger sense of collaborative work environment.



■ The Group organises town hall meetings to further enhance internal communications.

Learning and Development

The Group has established structured skills development programmes for all employees, including those in key

operational roles. These targeted learning activities are tailored to address the specific skill development needs of each business unit while supporting employees' career advancement goals. To ensure relevance, the content and structure of the learning programmes are regularly updated to align with market trends.

Performance appraisal

All employees participate in an annual internal performance appraisal. During this process, 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 communication across different job levels and cultivates an environment where transparency, continuous improvement and development are central to everyone.

People development

To support the Group's business growth and employees' professional development, the Group continuously offers extensive learning and development opportunities. These initiatives help employees realise their potential, enhance their competencies, and improve their skills and knowledge. Examples include soft skills training, site visits, and mentoring programmes.

To further develop expertise in specific functional areas, employees are also assigned significant roles and participate in task force teams across different business units. Our goal is to keep employees engaged and contribute to the Group's overall growth.

Upskilling and reskilling

Employees are the foundation of the Group. The Group is committed to continuously investing and upskilling initiatives to enhance their capabilities, support professional growth and ensure they are equipped to meet the evolving demands of the industry. Examples of the Group's training programmes are shown in the table below:

Figure 15: Training Provided to Employees

Type of Training	Details
Sustainability	Promote awareness and understanding of the Group's sustainability initiatives and key sustainability concepts
Technology	Training programmes in Adobe Analytics, Microsoft Office 365 and Tableau were organised to enhance skills for the digital world
Cyber Security	The Group organised Cybersecurity Awareness Month to educate employees about fraudulent and phishing emails. Additionally, the Group provides training courses to equip employees with the knowledge and skills necessary to protect personal and sensitive company information from online threats
Engineering	Employees have been invited to the Group's Network Operation Centre for site visits to gain firsthand insights into the operations and technologies that drive the network's efficiency and effectiveness
Professional Development	The Group invited speakers from diverse sectors to share their expertise on various topics, helping employees stay informed about the latest innovation trends and technological advancements
Ethics and Compliance	To ensure accountability and integrity, the Group provides training on ethical standards and legal obligations, helping employees gain a deeper understanding of compliance requirements

Sustainability Report

The Group also actively supports employees in attending training programmes organised by external institutions. This encourages professional development and skill enhancement, allowing employees to gain fresh perspectives and expertise in respective fields. The Group nominated employees to attend a designated course on sustainability, to broaden their knowledge and expertise in sustainability, enabling them to contribute effectively towards the Group's sustainability objectives.

Inclusion and Diversity

The Group is committed to fostering fair and inclusive workplaces for employees. The Group implements policies and initiatives that reflect the diverse communities the Group serves, ensuring its workforce and operations are representative of this diversity. The Group's focus on inclusion and diversity is integral to its broader Sustainability Framework, which encompasses critical areas such as Labour and Human Rights and Digital Inclusion.

The Group is dedicated to promoting equitable employment practices and ensuring diversity and equal opportunity in recruitment, promotions and working conditions. In alignment with its Human Rights Policy and Code of Ethics, the Group prioritises the selection and hiring of employees based on their skills and abilities, free from discrimination based on race, gender, religion or any other legally protected status. Furthermore, all reports of misconduct are addressed in accordance with the Group's Whistleblowing Policy, reinforcing its commitment to a respectful and inclusive workplace.

Additionally, the Group is committed to safeguarding its employees' freedom of association and respecting their right to form and join labour or trade unions of their choice, without fear of intimidation or retaliation, as outlined in the Human Rights Policy.



The Group is committed to fostering an inclusive workplace to empower women both in the workplace and beyond.

Health, Safety and Wellbeing

The Group holds the health, safety and well-being of its employees as fundamental values and is dedicated to providing a secure and protected environment for its employees, customers and other stakeholders while they are present at the Group's facilities and premises. The Group adheres to all relevant laws and regulations in the applicable jurisdictions. In addition, the Group strives to meet industry-specific standards or best practices, along with adopting local or international health and safety guidelines. These measures are implemented to sustain a safe working environment, prevent injuries and promote good health among employees.

In addition to employees, the Group extends the health and safety standards to its suppliers throughout the supply chain. Health and safety-related certifications, policies and measures are integral to the Group's supplier scoring system, ensuring that suppliers implement adequate protections for their employees.

Fostering a culture of health and wellbeing

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

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

Additionally, the Group organises regular health-related talks and workshops to raise awareness about various health topics, empowering its employees to make informed choices about their well-being. During the Reporting Period, the Group organised a health talk and a follow-up cancer risk assessment to educate its employees about cancer prevention and early detection.

Occupational health and safety risk management and risk mitigation

The Group has established a comprehensive health and safety policy and adopted a systematic approach to protect the health, safety and well-being of its employees. The Group has certification in ISO 45001:2018 Occupational Health and Safety Management System for designated locations. The certification exemplifies the Group's commitment to providing its employees with safe and healthy workplaces. The comprehensive health and safety policy stated the Group's commitment to providing employees with safe and healthy workplaces for the prevention of work-related injuries and ill health. The Group also encourages employees' consultation and participation to determine the actions in eliminating the hazards in workplace and to report OHS risks.

Holistic wellbeing

To alleviate workplace stress and foster wellness and communication among employees, the Group is committed to promoting a healthy work-life balance. During the Reporting Period, the Group organised a variety of activities designed to enhance well-being and strengthen connections among different teams. These included yoga classes to promote mindfulness and relaxation, archery sessions for skill development and teamwork, and sports photography competitions to encourage creativity and camaraderie.

Family Fun Day

To promote work-life balance, the Group organised a Family Day during the Reporting Period, aimed at helping employees achieve a harmonious "work-play-educate balance" with their families. This event incorporated sustainability themes, allowing employees and their families to participate in various workshops and activities, such as handmade soap and natural mosquito repellent sachet making. Additionally, educational games focused on food waste reduction and low-carbon living were offered. Through this Family Day, employees not only alleviated work-related stress but also strengthened parent-child relationships while instilling important environmental concepts related to low-carbon living and the circular economy.



Community Investments

Community contributions

The Group is committed to building lasting partnerships with local communities and charitable organisations through mutually beneficial programmes. While the Group makes donations and contributions in line with internal compliance guidelines and controls, its employees participate in various volunteer work. In 2024, the Group donated a total of HK\$12.5 million across various outreach initiatives focused on education, youth engagement and others, supporting and positively impacting community projects in Hong Kong and Macau.

The Group has maintained "Caring Company" status granted by the Hong Kong Council of Social Service for more than 20 years. The following table summarises the Group's contribution to the community.

Figure 16: Summary of the Group's Contributions to Various Areas in Communities

Focus Area	Activities
Cultural	 Supported Art Basel Hong Kong 2024 as an official partner by providing dedicated 5G mobile broadband services for exhibitors and introducing the 5G Smart People Counting Solution. Year 2024 marked the Group's third consecutive year of collaboration with Art Basel Hong Kong. Acted as the 5.5G art-tech partner for Hong Kong's first 5.5G drama <i>Left Unsaid</i>, enabling actors and the audience to connect to a 5.5G network in the Hong Kong Cultural Centre and engage in an immersive 5.5G theatre. Served as the 5G strategic partner for "One Beat, One World: Connecting Through the Drum" Carnival and Hong Kong's first outdoor 5.5G live music event.
Cyber Security	 Offered the "Incoming Calls Management Pack" which comprises "Anti-scam" and "Call Block" value-added services to assist customers in identifying and blocking scam and nuisance calls. Collaborated with the Hong Kong Police to spread anti-phone scam messaging via Short Message Service ("SMS") and helped OFCA display Prefix # leaflets at shops to promote the SMS Sender Registration Scheme. Helped combat phone scams by offering customers aged 60 or above with free Incoming Calls Management Pack to block scam and nuisance calls.
Digital Inclusion	 Supported senior citizens with the Lo-Yau-Kee Monthly Service Plans Sponsorship Programme and catered to the needs of vulnerable groups with "Tung Wah Group of Hospitals CEASE Crisis Centre Monthly Service Plans Sponsorship".
Environmental	Started VeggieLab in 2021, an urban organic farm on the rooftop of the Group's headquarters, to create green space, promote environmental greening and reduce carbon emissions. The farm has been running for three consecutive years.

Focus Area	Activities
Healthcare	 Participated in Hong Chi Climbathon by forming a team with Hong Chi students and raised funds to support people with intellectual disabilities.
Underprivileged	• Strengthened community ties by encouraging employees to share home-grown harvests at VeggieLab with the underprivileged and through home visits as part of the Group's Farming for Charity initiative.
Others	In the form of provision of free publicity via multimedia messaging service ("MMS"), the Group supported social and charitable organisations in fund raising events, sports activities, health promotions and social welfare programmes including: Principal Chan Free Tutorial World's Flag Day World Vision's Used Book Recycling and Charity Sale Programme Hats On Day organised by the Children's Cancer Foundation World Sight Day of The Fred Hollows Foundation Hong Kong Joyful Charity Run and Walk organised by Joyful (Mental Health) Foundation Walk for Nature by the World Wide Fund for Nature Hong Kong Tour around Hong Kong Charity Walk of the Arts with Disabled Association Hong Kong Charity Golf Tournament of the Hong Kong Federation of Youth Groups Friends of Christian Action Monthly Donation Programme Lok-lok & Yiu-yiu Sponsorship Scheme and Christmas Blessing Campaign organised by SKH St Christopher's Home

Environmental KPIs

	Unit	2022	2023	2024
GHG emissions (1)(2)				
Total scope 1 + 2 GHG emissions (location-based)	tonne CO,e	106,049	109,598	117,628
Total scope 1 + 2 GHG emissions (market-based)	tonne co,e	78,448	80,424	85,007
Scope 1 GHG emissions (3)	tonne co,e	1,797	1,394	2,450
Scope 2 GHG emissions (location-based)	tonne co,e	104,252	108,204	115,179
Scope 2 GHG emissions (market-based)	tonne co,e	76,651	79,030	82,558
Scope 3 GHG emissions (4)(5)	tonne CO,e	N/A	N/A	1,074
Total scope 1 + 2 GHG emissions (location-based) intensity	tonne CO ₂ e/revenue HK\$'000	0.022	0.022	0.025
Total scope 1 + 2 GHG emissions (market-based) intensity	tonne CO ₂ e/revenue HK\$'000	0.016	0.016	0.018
Scope 1 GHG emissions intensity	tonne CO ₃ e/revenue HK\$'000	0.000	0.000	0.001
Scope 2 GHG emissions (location-based) intensity	tonne CO,e/revenue HK\$'000	0.021	0.022	0.024
Scope 2 GHG emissions (market-based) intensity	tonne CO,e/revenue HK\$'000	0.016	0.016	0.017
Use of energy (1)(2)	-			
Total energy consumption	000' kWh	163,135	169,527	179,328
Total direct energy consumption	000' kWh	165	182	128
Diesel/Gasoline/Petrol ⁽⁶⁾	000' kWh	165	182	128
Indirect energy consumption	000' kWh	162,970	169,345	179,200
Electricity	000' kWh	162,970	169,345	179,200
Total energy consumption intensity	kWh/revenue HK\$'000	33.41	34.62	37.50
Direct energy consumption intensity	kWh/revenue HK\$'000	0.03	0.03	0.03
Indirect energy consumption intensity	kWh/revenue HK\$'000	33.38	34.59	37.47
Air emissions				
NOx emissions	tonne	0.03	0.02	0.03
SOx emissions	tonne	0.00	0.00	0.00
Particulate matter emissions	tonne	0.00	0.00	0.00
Waste produced				
Total hazardous waste produced (7)	tonne	34	72	21
Total hazardous waste produced intensity	kg/revenue HK\$'000	0.01	0.01	0.00
Total non-hazardous waste produced	tonne	42	39	41
Total non-hazardous waste produced intensity	kg/revenue HK\$'000	0.01	0.01	0.00
Waste recycled ⁽⁸⁾				
Paper	tonnes	13	8	9
Solid waste ⁽⁹⁾	tonnes	N/A	1.04	1.85
Batteries (10)	tonnes	8	67	21
Electronic equipment	pieces	783	312	494
Use of water				
Water consumption	m³	3,780	3,754	3,899
Water consumption intensity	m³/revenue HK\$'000	0.001	0.001	0.001
Packaging material (11)				
Total packaging material used for finished products	tonne	6.24	23.22	17.17
Plastic	tonne	5.68	21.43	15.35
Paper	tonne	0.44	1.34	1.49
Metal	tonne	0.12	0.46	0.33
Packaging material intensity	tonne/product '000	0.004	0.004	0.004

Sustainability Report

Notes:

- (1) The calculation of location-based emissions and energy consumption has adopted emission factors published by the International Energy Agency for the year ended 31 December 2024.
- (2) The Group has incorporated the calculation of market-based emissions and energy consumption by adopting emission factors sourced from energy providers as documented in their 2023 sustainability reports.
- (3) The increase in scope 1 emissions was mainly driven by the increase in refrigerant disposal, such variance is considered as normal fluctuation since the disposal of refrigerant is dependent on the decommissioning of air-conditioning equipment.
- (4) Scope 3 emissions included emissions from waste generated in operations (category 5), business travel (category 6), employee commuting (category 7) and franchises (category 14).
- (5) To further expand our GHG emission reporting, we have started to disclose certain aspects of our scope 3 emissions for the Reporting Period. The compilation of our scope 3 GHG emissions data is based on the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. Relevant emission factors were sourced from environmentally-extended input output (EEIO) database and the UK Government GHG Conversion Factors for Company Reporting.
- (6) The decrease in gasoline and fuel consumption was driven by the disposal of company vehicle.
- (7) The decrease in hazardous waste was mainly driven by the decrease in battery waste, such variance is considered as normal fluctuation since the disposal of batteries is irregularly scheduled.
- (8) Waste recycled reporting format has been revised to list out the recycled items by major category.
- (9) Solid waste recycled includes cans, glass, beverage cartons and plastic bottles from office operation.
- (10) The reduction in recycled batteries was driven by fewer batteries being disposed in network sites.
- (11) The decrease in packaging material was mainly driven by the decrease in SIM card purchasing due to sufficient inventory level.

Social KPIS

		2022	2023	2024
Number of employees				
Total		1,155	1,240	1,181
By employment type	Full-time	1,066	1,157	1,105
	Part-time	89	83	76
Number of full-time employees				
By gender	Male	645	687	664
	Female	421	470	44
By employee category	Manger grade or above	105	118	11
	General staff	961	1,039	99
By age group	Under 30	160	174	16
	30-49	678	706	67
	50 or above	228	277	27
By geographical region	Hong Kong	966	1,061	1,020
	Mainland China	100	96	8
Turnover rate for full-time employees				
Overall		42%	32%	319
By gender	Male	43%	33%	349
	Female	42%	31%	279
By age group	Under 30	76%	49%	439
	30-49	41%	34%	309
	50 or above	23%	17%	289
By geographical region	Hong Kong	45%	34%	32
	Mainland China	14%	17%	21
Lost days due to work fatalities				
Number of lost days due to work fatalit	ies	-	-	
By employee type	Full-time employees	-	-	
	Contractors	-	-	
Rate of work-related fatalities		-	-	
Lost days due to work injury (12)				
Number of lost days due to work injury		182	72	69
Number of lost time injury incidents		3	2	
Percentage of full-time employees who	received training			
Overall		87%	89%	889
By gender	Male	60%	60%	619
	Female	40%	40%	399
By employee category	Manger grade or above	8%	9%	109
	General staff	92%	91%	909

Notes

(12) 2024 included two major injury cases contributing to 422 days out of 697 days which occured in Hong Kong.

Social KPIS (Continued)

		2022	2023	2024
Average hours of training completed	d by full-time employees			
Overall		21 hours	22 hours	23 hours
By gender	Male	21 hours	25 hours	24 hours
	Female	20 hours	18 hours	21 hours
By employee category	Manager grade or above	6 hours	19 hours	21 hours
	General staff	22 hours	22 hours	23 hours
Number of suppliers				
Total		716	724	666
By geographical region	Hong Kong	332	379	315
	Mainland China	362	327	333
	Europe	8	6	8
	Canada	-	-	-
	Asia, Australia & Others	14	12	10
Percentage of total product sold or sl	nipped subject to recalls for safety and health reaso	ons		
Percentage of total product sold or seasons	shipped subject to recalls for safety and health	-	-	-
Number of complaints received				
Products related		N/A	N/A	N/A
Services related		10,544	11,475	12,454
Number of concluded legal cases reg	garding corrupt practices			
Brought against the Group		-	-	-
Brought against employees		-	-	-
Full-time and part-time employees	who received training on anti-corruption/ethics a	nd integrity		
Total		1,070	1,135	1,092
By employment type	Full-time	1,002	1,084	1,047
	Part-time	68	51	45
Percentage of full-time and part-tim corruption/ethics and integrity	ne employees who received training on anti-	93%	92%	92%
Number of training hours on anti-co	rruption/ethics and integrity completed by full-ti	me and part-time o	employees	
Total		357	378	2,190
By employment type	Full-time	334	361	2,094
	Part-time	23	17	96

HKEX ESG Guide Content Index

The ESG Guide Content Index set out below contains information about the extent to which the Group has applied the HKEX ESG Guide and cross-references the Group policies and initiatives outlined in this report.

Indicators	Section
Mandatory Disclosure Requirements	
Governance structure	
A statement from the board containing the following elements: (i) a disclosure of the board's oversight of ESG issues; (ii) the board's ESG management approach and strategy, including the process used to evaluate, prioritis and manage material ESG-related issues (including risks to the issuer's businesses); and (iii) how the board reviews progress made against ESG-related goals and targets with an explanation of how they relate to the issuer's businesses.	
Reporting principles	
A description of, or an explanation on, the application of the following Reporting Principles in the preparation of the ESG report: Materiality: The ESG report should disclose: (i) the process to identify and the criteria for the selection of material ESG factors; (ii) if a stakeholder engagement is conducted, a description of significant stakeholder identified, and the process and results of the issuer's stakeholder engagement. Quantitative: Information on the standards, methodologies, assumptions and/or calculation tools used, an source of conversion factors used, for the reporting of emissions/energy consumption (where applicable) should be disclosed. Consistency: The issuer should disclose in the ESG report any changes to the methods or KPIs used, or any other relevant factors affecting a meaningful comparison.	Reporting principles
Reporting Boundary	
A narrative explaining the reporting boundaries of the ESG report and describing the process used to identify which entities or operations are included in the ESG report. If there is a change in the scope, the issuer should explain the difference and reason for the change.	

A. Environmenta	al		
Subject Areas, Aspects, General Disclosures and KPIs	Corresponding GRI Reference	Topic	Reporting Section
A1 Emissions			
General Disclosure	3-3 Management of material topics	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and greenhouse gas emissions, discharges into water and land, and generations of hazardous and non-hazardous waste.	Environmental Management
KPI A1.1	305-4 GHG emissions intensity	The types of emissions and respective emissions data.	Environmental KPIs
KPI A1.2	305-1 Direct (Scope 1) GHG emissions 305-2 Energy indirect (Scope 2) GHG emissions	Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Environmental KPIs
KPI A1.3	306-3 Waste generated	Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Environmental KPIs
KPI A1.4	300-3 waste generated	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Environmental KPIs
KPI A1.5	305-5 Reduction of GHG emissions	Description of emissions target(s) set and steps taken to achieve them.	Decarbonisation - GHG Emissions Reduction Targets
KPI A1.6	306-2 Management of significant waste-related impacts	Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them.	Decarbonisation - Environmental Targets; Circular Economy
A2 Use of Resourc	es		
General Disclosure	3-3 Management of material topics	Policies on the efficient use of resources, including energy, water and other raw materials.	Environmental Management; Energy Efficiency; Natural Resources Protection
KPI A2.1	302-1 Energy consumption within the organisation 302-2 Energy consumption outside of the organisation	Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per unit of production volume, per facility).	Environmental KPIs

A. Environmental (Continued)			
Subject Areas, Aspects, General Disclosures and KPIs	Corresponding GRI Reference	Торіс	Reporting Section
A2 Use of Resource	es		
KPI A2.2	303-5 Water consumption	Water consumption in total and intensity (e.g. per unit of production volume, per facility).	Environmental KPIs
KPI A2.3	302-4 Reduction of energy consumption	Description of energy use efficiency target(s) set and steps taken to achieve them.	Climate Action
KPI A2.4	303-1 Interactions with water as a shared resource	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.	Natural Resources Protection
KPI A2.5	301-1 Materials used by weight or volume	Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	Environmental KPIs
A3 The Environme	nt and Natural Resources		
General Disclosure	3-3 Management of material topics	Policies on minimising the issuer's significant impacts on the environment and natural resources.	Natural Resources Protection
KPI A3.1	304-2 Significant impacts of activities, products and services on biodiversity	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	Natural Resources Protection
A4 Climate Change	2		
General Disclosure	3-3 Management of material topics	Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.	Climate Action
KPI A4.1	201-2 Financial implications and other risks and opportunities due to climate change	Description of the significant climate-related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.	Climate Action

B. Social			
Subject Areas, Aspects, General Disclosures and KPIs	Corresponding GRI Reference	Topic	Reporting Section
Employment and	Labour Practices		
B1 Employment			
General Disclosure	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.	Talent Attraction
KPI B1.1	405-1 Diversity of governance bodies and employees	Total workforce by gender, employment type (for example, full- or part-time), age group and geographical region.	Social KPIs
KPI B1.2	401-1 New employee hires and employee turnover	Employee turnover rate by gender, age group and geographical region.	Social KPIs
B2 Health and Safe	ety		
General Disclosure	403-1 Occupational health and safety management system	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards.	Health, Safety and Wellbeing
KPI B2.1	403-10 Work-related ill health	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	Social KPIs
KPI B2.2	403-9 Work-related injuries	Lost days due to work injury.	Social KPIs
KPI B2.3	403-3 Occupational health services	Description of occupational health and safety measures adopted, and how they are implemented and monitored.	Health, Safety and Wellbeing

Subject Areas, Aspects, General Disclosures and KPIs	Corresponding GRI Reference	Topic	Reporting Section
B3 Development a	and Training		
General Disclosure	404-2 Programs for upgrading employee skills and transition assistance programs	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	Talent Attraction; Learning and Developmen
KPI B3.1	404-3 Percentage of employees receiving regular performance and career development reviews	The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	Social KPIs
KPI B3.2	404-1 Average hours of training per year per employee	The average training hours completed per employee by gender and employee category.	Social KPIs
B4 Labour Standa	rds		
General Disclosure	3-3 Management of material topics	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.	Talent Attraction; Labour and Human Rights
KPI B4.1	3-3 Management of material topics	Description of measures to review employment practices to avoid child and forced labour.	Talent Attraction; Labour and Human Right
KPI B4.2	3-3 Management of material topics	Description of steps taken to eliminate such practices when discovered.	Talent Attraction; Labour and Human Right Whistleblowing
Operating Practice	es		
B5 Supply Chain M	lanagement		
General Disclosure	3-3 Management of material topics	Policies on managing environmental and social risks of the supply chain.	Supply Chain Responsibility
KPI B5.1		Number of suppliers by geographical region.	Supply Chain Responsibility
KPI B5.2	308-2 Negative environmental impacts in the supply chain and actions taken	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	Supply Chain Responsibility
KPI B5.3	308-1 New suppliers that were screened using environmental criteria 414-1 New suppliers that were screened using social criteria	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	Supply Chain Responsibility

Subject Areas,	Corresponding GRI	Topic	Reporting Section
Aspects, General Disclosures and KPIs	Reference	ТОРІС	Reporting Section
Operating Practice	25		
B5 Supply Chain M	lanagement		
KPI B5.4	3-3 Management of material topics	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	Supply Chain Responsibility
B6 Product Respon	nsibility		
General Disclosure	3-3 Management of material topics	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.	Service Excellence; Data Privacy and Cyber Security
KPI B6.1	416-1 Assessment of the health and safety impacts of product and service categories	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	Social KPIs
KPI B6.2	416-1 Assessment of the health and safety impacts of product and service categories	Number of products and service related complaints received and how they are dealt with.	Service Excellence - Customer Relationship Management; Social KPIs
KPI B6.3	3-3 Management of material topics	Description of practices relating to observing and protecting intellectual property rights.	Service Excellence - Intellectual property protection
KPI B6.4	3-3 Management of material topics	Description of quality assurance process and recall procedures.	Service Excellence – Quality checking and assurance
KPI B6.5	3-3 Management of material topics	Description of consumer data protection and privacy policies, and how they are implemented and monitored.	Data Privacy and Cyber Security

Subject Areas, Aspects, General Disclosures and KPIS	Corresponding GRI Reference	Торіс	Reporting Section
B7 Anti-corruptio	n		
General Disclosure	3-3 Management of material topics	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering.	Internal Control Framework
KPI B7.1	205-3 Confirmed incidents of corruption and actions taken	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	Social KPIs
KPI B7.2	205-3 Confirmed incidents of corruption and actions taken	Description of preventive measures and whistle-blowing procedures, and how they are implemented and monitored.	Internal Control Framework
KPI B7.3	205-2 Communication and training about anti- corruption policies and procedures	Description of anti-corruption training provided to directors and staff.	Internal Control Framework; Board ESG Training
Community			
B8 Community In	vestment		
General Disclosure	413-1 Operations with local community engagement, impact assessments, and development programs	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	Community Investments
KPI B8.1	203-2 Significant indirect economic impacts	Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	Community Investments
KPI B8.2	201-1 Direct economic value generated and distributed 203-1 Infrastructure investments and services supported	Resources contributed (e.g. money or time) to the focus area.	Community Investments