



SUSTAINABILITY REPORT

By integrating sustainability into its business strategy and operations, the Group creates shared value for stakeholders and supports long-term prosperity. A supportive work environment and tailored human resource strategies empower its workforce to grow alongside the business.



Sustainability Report

About this Report

Hutchison Telecommunications Hong Kong Holdings Limited (the “Company” or “HTHKH”) and its subsidiaries (collectively the “Group”) present the following 2025 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 2025.

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 2025 (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 2025 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 [↔](#).

* The Group completed the sale of its entire interests in a subsidiary which engages in the mobile telecommunications business in Macau on 12 January 2026.



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 93.

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 or email us at sustainability@hthk.com.



Sustainability at the Group

2025 Performance highlights



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 by 2% annually.
- (2) The ratio of workforce by gender refers to the number of full-time employees by gender.
- (3) The number of average training hours refers to training hours completed by full-time employees.

Reporting what matters

Sustainability plays a pivotal role in ensuring that the Group maintains its position as a responsible digital operator 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.

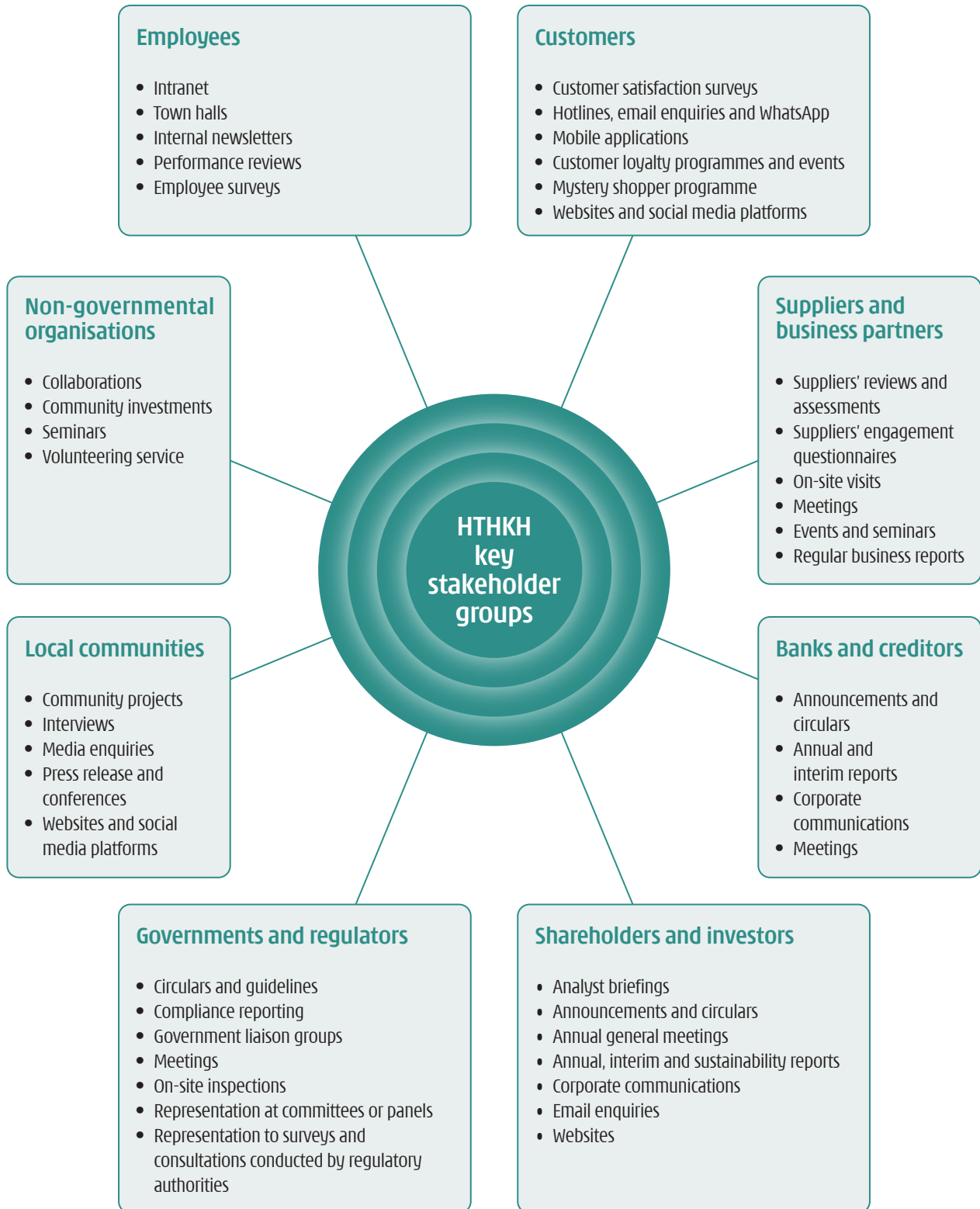
Stakeholder engagement

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.

Environmental, Social and Governance ("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 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 an 'A' ESG rating from Morgan Stanley Capital International ("MSCI") and a ESG risk rating of '26.5' from Sustainalytics ESG rating as at the publication of this report. These achievements underscore the Group's ongoing dedication to sustainable practices. HTHKH's ESG rating remains at a strong level, reflecting the Group's unwavering commitment and continuous progress across ESG dimensions.

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



Materiality Assessment

Materiality Assessment is an important process to identify, evaluate and prioritise topics that are critical to HTHKH's business operations. Last year, HTHKH conducted a comprehensive materiality assessment which identified 20 material topics. Among these topics, seven are highly material, eight are moderately material and five are generally material.

Figure 2: Materiality Matrix



This year, HTHKH continued to engage with stakeholders and review the relevance of material topics. Previous assessment results remain highly relevant and continue to guide its sustainability strategy effectively. In addition, the external operating environment has not experienced significant changes, making the existing material topics appropriate. The Group has maintained last year's assessment results as this year's material topics. The board-level Sustainability Committee reviewed and approved the materiality assessment results to ensure that the assessment remain valid and that the Group's sustainability practices and policies continue to align with the Group's strategy and stakeholder expectations.

The Group also actively supported its parent company in performing a comprehensive double materiality assessment, which further reinforces the robustness of its approach and ensures consistency across the group.

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 3: Group Sustainability Framework

Governance	Sustainable Business Model & Innovation	Environment	Social
Material Topics			
<ul style="list-style-type: none"> • Integrated governance structure • Internal control framework • Data privacy and cyber security • Labour and human rights • Supply chain responsibility • Systematic risk management 	<ul style="list-style-type: none"> • Service excellence • Climate resilient business • Digital inclusion • Customer data privacy and protection • Customer service satisfaction 	<ul style="list-style-type: none"> • Decarbonisation • Climate action • Circular economy 	<ul style="list-style-type: none"> • Talent attraction • Employee engagement • Learning and development • Health, safety and wellbeing • Inclusion and diversity • Community investments
Goals			
<ol style="list-style-type: none"> 1. Embed rigorous and effective governance 2. Operate responsibly with integrity 	<ol style="list-style-type: none"> 3. Offer customers sustainable products and invest in and embrace innovation to achieve transformational impacts 	<ol style="list-style-type: none"> 4. Take action on climate change 5. Protect natural resources 6. Promote a circular economy 	<ol style="list-style-type: none"> 7. Create great places to work 8. Invest in developing thriving & resilient communities
Mapping to the UNSDGs			

Process Highlights and Plans

Figure 4: Group Highlights and Ambitions

Governance



Goals

Embed rigorous and effective governance

- Operate responsibly with integrity


Highlights for 2025

- 91% of employees completed trainings on anti-corruption/ethics and integrity.
- Launched workforce diversity policy.

Objectives and Targets (2026-27)

- Support business units in rolling our 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 2025

- Ongoing focus and delivery of smart city solutions.
- Continued to offer free Anti-Scam Service to postpaid elderly customers.
- Collaborated with Huawei International Company Limited to deploy cloud-native intelligent infrastructure.
- Enhanced digital literacy among young students.
- Hosted 3Business EMPOWER Partnership Summit 2025.

Objectives and Targets (2026-27)

- 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 2025

- Participated in CK Hutchison Group Telecom Holdings Limited's ("CKHGT") initiatives to complete the external limited data assurance for the 2024 data.
- Collaborated with Huawei International Company Limited to deploy cloud-native intelligent infrastructure to enhance urban resilience and recovery efficiency in case of extreme weather.
- Launched pilot renewable energy system.
- Performed financial materiality assessment on climate-related risks and opportunities to assess the climate resilience of the Group.
- Actively engaged top-spend suppliers to review their Greenhouse Gas ("GHG") emissions and targets.
- Achieved 100% lead-acid battery recycling for Hong Kong operations.

Objectives and Targets (2026-27)

- 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 2025

- Organised health and wellness activities to promote employee well-being and foster a positive workplace culture.
- Invested HK\$21.7 million in community initiatives.

Objectives and Targets (2026-27)

- Continue to seek potential enhancements in employee benefits.
- Persist on advancing efforts to address diversity and inclusion related issues, in addition to developing related targets.
- Sustain to provide learning and development opportunities to all employees and talents.
- Promote healthcare and well-being initiatives in the workplace.
- Serve as an active member of the community, targeting investments to meet the needs of the community.

Awards, Honours and Certifications

Over the past few years, HTHKH continue to uphold the principle of sustainable development, maintained robust ESG performance and continuously explore innovative approaches to integrate new ESG practice into business operations.

Throughout the years, the Group has committed to implementing a wide range of ESG initiatives and corporate solutions to meet stakeholder expectation and address smart city needs. During the Reporting Period, HTHKH's ESG performance has once again been recognised and supported by third parties. Awards, honours and certifications are listed in the table below. Looking ahead, HTHKH will continue to explore new opportunities in ESG development, leveraging technological strengths to drive progress in both sustainability and innovation.

Certifications

- ISO 14001:2015 Environmental Management System Certificate
- ISO 45001:2018 Occupational Health and Safety Management system Certificate
- Hong Kong Green Organisation Certification – Wastewi\$e Certificate – Excellent Level
- Hong Kong Green Organisation Certification – Energywi\$e Certificate – Good Level
- United Nations Sustainable Development Goals – Green Office Awards Labelling Scheme – Green Office and Eco-Healthy Workplace
- Certificate of Compliance Payment Card Industry Data Security Standard (PCI DSS v4.0.1 – Merchants)

Awards

- 4th Environmental, Social and Governance Awards – ESG Grand Awards
Master-insight.com and The Research Centre for ESG at the Hang Seng University of Hong Kong
- Hong Kong Corporate Governance and ESG Excellence Award – Award of Excellence in ESG (Others & GEM Companies)
The Chamber of Hong Kong Listed Companies and the Centre for Corporate Governance and Financial Policy of Hong Kong Baptist University
- TVB ESG Awards – ESG Special Recognition Award
Television Broadcasts Limited
- Digital Accessibility Recognition Scheme – Triple Gold Award and Elderly-Friendly Award
Hong Kong Internet Registration Corporation Limited and Digital Policy Office
- Good MPF Employer Award – Good MPF Employer, e-Contribution Award and MPF Support Award
Mandatory Provident Fund Schemes Authority
- Outstanding Quality Tourism Services (QTS) Merchant and Service Staff Award – Grand Award
Hong Kong Tourism Board
- Outstanding QTS Merchant Service Supervisory Staff Awards – Telecommunications & Electronics Category – Gold Award
Hong Kong Tourism Board
- Outstanding QTS Merchant Service Frontline Staff Awards – Telecommunications & Electronics Category – Gold and Silver Awards
Hong Kong Tourism Board
- 57th Distinguished Salesperson Award (DSA) Programme
The Hong Kong Management Association Sales and Marketing Executives Club
- Caring Company Scheme – 20 Years Plus Caring Company and Caregiver-Friendly Company
The Hong Kong Council of Social Services
- Hong Kong Best Employer Brand Awards
Employer Branding Institute, World HRD Congress & Stars of the Industry Group

Ratings

- 'A' in Morgan Stanley Capital International ("MSCI") ESG rating
- ESG risk rating of 26.5 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 5: 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, including climate-related issues. With the support of the Sustainability and Audit Committees, the Board conducts thorough 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.

The Board also holds ultimate responsibility for governing, overseeing and monitoring climate-related risks and opportunities. It ensures that the Group maintains sufficient resources, robust policies and effective measures to respond to the climate-related impacts, risks, opportunities and emerging trends. For more details on HTHKH's climate change governance, please refer to the "Climate-related disclosure - Governance" section.

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.

During the Reporting Period, the Group provided Continuous Professional Development training regarding climate-related risks and opportunities and sustainability trends to Directors, strengthening climate risk governance and supporting long-term business resilience.

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 once a year to ensure its ongoing effectiveness.

During the Reporting Period, the Group appointed a new Executive Director to succeed the one who resigned. 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 Exchange¹.

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 Ho, Executive Director and Chief Executive Officer (appointed following the retirement of Mr Koo, a former Independent Non-executive Director, on 1 October 2025), and Ms Chow, Independent Non-executive Director, 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.

¹ Based on the information from HKEX Board Diversity Hub as of Jan 2026. ⇄

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.

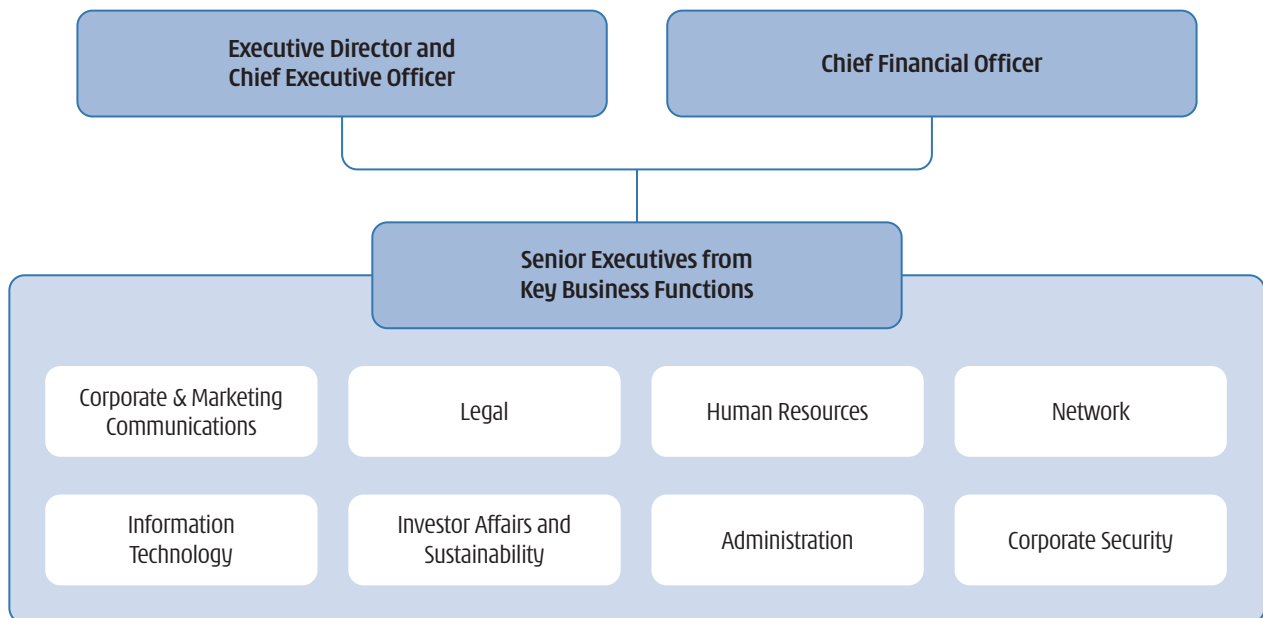
Governance Working Group

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.

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 6: 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.

As a subsidiary of CKHH, the Group is subjected to audits conducted by the Group Management Service Department ("GMSD") of CKHH. GMSD reviews and formulates the annual audit plan for HTHKH's business units, taking into account market conditions, industry trends, key business priorities and strategic projects. During the Reporting Period, several business units were audited in accordance with established policies and procedures. These audits reinforce governance standards and support continuous improvement across the Group.

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.

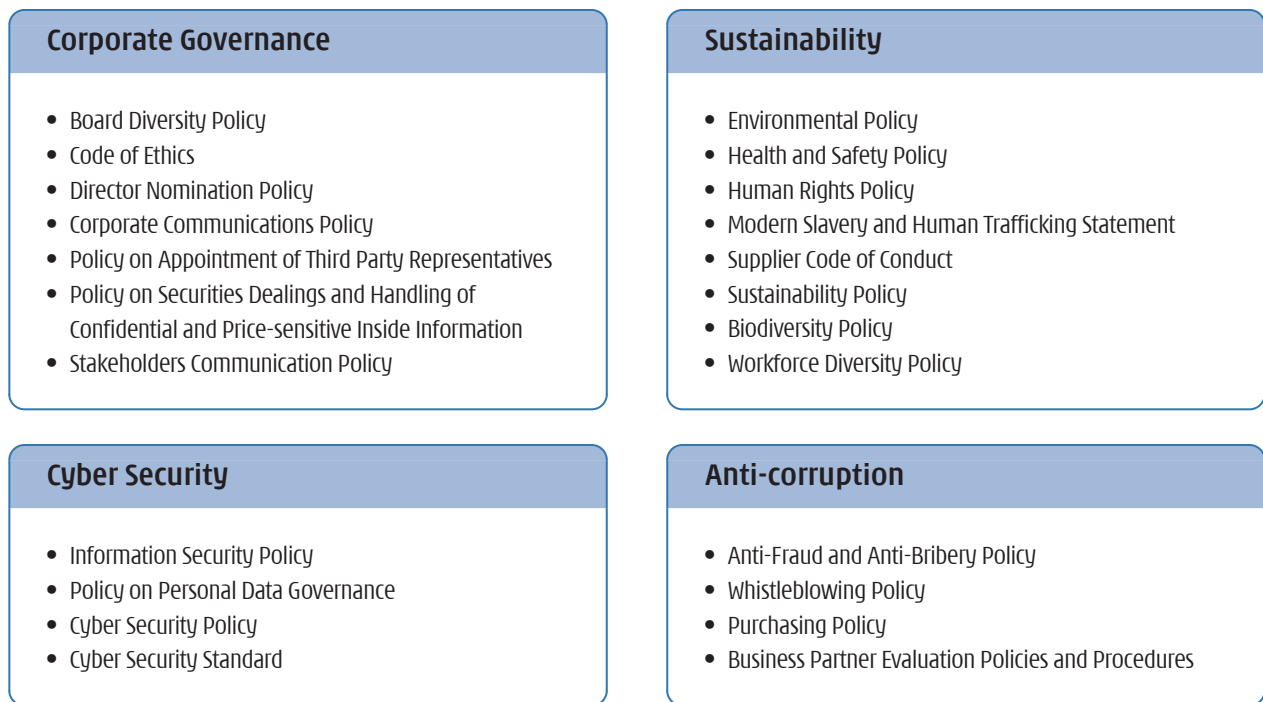
The Group continuously monitors climate-related risks and opportunities that could potentially affect HTHKH's business strategy and operations. Details of climate-related risk management procedures can be referred to section "Climate-related disclosure - Risk management".

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 7: Governance Policies



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 Purchasing Policy, Business Partner Evaluation Policies and Procedures 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 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 20 hours of CPD training were undertaken by each Director during the Reporting Period. For more information, please refer to the "Trainings and development" 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. These policies and practices are aligned with globally recognised frameworks and standards, including the ISO/IEC 27000 series, PCI DSS, the NIST Cybersecurity Framework, and COBIT 5, applied across all business units and validated through external audits and independent assessments. 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.

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 is 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 in Hong Kong and for five years in Macau, in full compliance with regulatory requirements. 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 use of personal data by third parties is closely monitored, with access granted on a "need-to-know" basis.

The Group carried out regular vulnerability assessment before and throughout system implementation or reconfiguration. These comprehensive risk and impact assessments help mitigate potential risks that may arise prior to launch or during operation and minimise possible impacts to the Group and customers.

To ensure secure online transactions for customers, the Group obtained the Certificate of Compliance with the Payment Card Industry Data Security Standard (PCI DSS v4.0.1 – 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. Whenever the Group engages third-party platforms or applications, it ensures that only the minimum necessary personal data is collected and that all activities strictly comply with the Group's privacy-related 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Each business unit needs to establish its information security custodian and its responsibilities include: <ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> • 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 network vulnerabilities, the Group regularly conducts internal and external audits on its products, services and systems. Internal audits, operational acceptance testing and third-party vendor risk assessment were carried out to evaluate the effectiveness of security measures and the security performance of business partners.

External audits were performed by two independent parties in accordance with the PCI DSS requirements and the IT General Controls ("ITGC") Frameworks. These annual audits covered area such as firewall policy, network diagram, incident logs, incident monitoring program, data encryption and other IT security controls. The Group successfully obtained the PCI DSS certification, and no non-conformities were identified in the ITGC audit. PCI Dss audits cover all IT components and operations in Hong Kong that involve customer credit card data and ITGC audit covers all of HTHKH's business units and key systems. These audit processes play a critical role in strengthening the Group's risk management capabilities by ensuring timely identification and mitigation of potential cybersecurity threats.

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 adopted a 24/7 Security Operations Centre for real-time monitoring for threat detection and response, and 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.

The Group continues to upgrade its system to address rising global cybersecurity threats and ensure a secure network environment for customers. During the Reporting Period, the Group raised security standards for data transmission (TLS v1.2), enhanced protection for web-based services, upgraded firewall infrastructure and introduced advanced network monitoring capabilities. These measures strengthen cybersecurity resilience against external threats and improve the ability to detect and respond to unusual activities.

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 on a quarterly basis 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.

Responsible use of AI

HTHKH leverages AI-related technologies to deliver innovative solutions and services while prioritising safety and security throughout implementation. The Group has established practices to ensure AI tools are deployed responsibly and in compliance with regulatory requirements, while safeguarding sensitive information. Regular audits are conducted to ensure all controls are applied appropriately.

The AI-related policies are under review to ensure consistency with the Group's operating framework. They define robust principles and protocols for AI system usage—spanning internal, external, and commercial contexts—reinforcing responsible adoption and adherence to CKHH's strategic priorities, governance standards, and regulatory obligations.

The Group provides ongoing trainings and awareness programmes to strengthen employees' understanding of responsible AI use. These initiatives ensure that employees handle sensitive information appropriately and in accordance with the Group's Information Classification Scheme, as well as relevant laws and regulations. Employees are permitted to use AI applications merely that have been approved by the IT department, reinforcing a controlled and compliant AI operating environment.

Labour and Human Rights

The Group adheres to and has developed labour 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 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	<ul style="list-style-type: none"> 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 behaviour, 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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.
Workforce Diversity Policy	<ul style="list-style-type: none"> Implementing all facets of employment, the Group abides by non-discriminatory employment practices and procedures without deviation and fosters actively diversity and inclusion initiatives, celebrates diverse perspectives and contributions, and encourages collaboration and engagement among its workforce.

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 engagement 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 assessment

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 698 suppliers and 61 of them were evaluated.

Sourcing guidelines

The Group promotes the use of environmentally preferable products and integrates relevant requirements into its Supplier Code of Conduct, encouraging partners and suppliers to reduce energy use and carbon emissions. It also advocates for environmentally friendly, recycled and sustainable materials across its operations. To support circular economy, the Group has eliminated plastic packaging for most prepaid SIM cards and introduced EcosIM cards made from 100% recycled, carbon neutral plastic. The Group will continue working with its business partners and suppliers to explore sustainable options and drive long term environmental progress.

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

Content in this Section

- Service Excellence
- Digital Inclusion
- Partnership and Collaboration

Mapping to the UNSDGs



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 disclosure-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 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. 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 Customer Relationship Team regularly engages through multiple survey channels to collect feedback on service performance. Cases with lower satisfaction scores are systematically reviewed, and targeted improvement actions are implemented to drive continuous enhancement in customer experiences.

The Group's premium brand “3SUPREME” offers exclusive benefits through exceptional communication services and tailored experiences, encompassing culture, entertainment, dining and leisure activities for its high-spending customers. 3SUPREME 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, 3SUPREME 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.



3SUPREME provides premium services and exclusive privileges, including access to select events and digital lifestyle experiences.



The Group aims to provide customers with a comprehensive suite of services and convenient channels for interaction.

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 8: The Group's Performance Pledge - Customer Complaint Handling

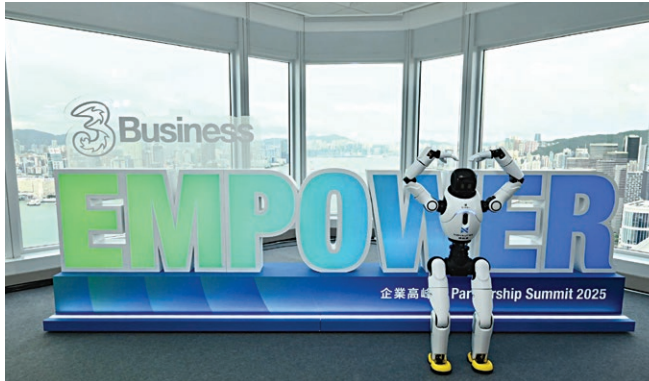
Target	Parameter	General description	Performance target	2025 Actual performance
Customer Complaint Handling	Complaint Acknowledgement	The mean time to acknowledge a complaint, counting from the time the complaint lodged by a customer	95% within one working day	97%
Customer Complaint Handling	Complaint Resolution Time	The mean time to provide the first resolution to a customer within five working days	90%	95%

Partnership and collaboration

The Group recognises the critical role of collaboration in driving business innovation and sustainability, and actively partners with business partners to explore advance 5G technologies, aiming to enhance operational efficiency, improve customer experience and promote the application of telecommunication solutions across diverse scenarios to accelerate smart development in various sectors. Since 2024, HTHKH has signed memoranda of understanding ("MOUs") with Huawei International Company Limited to deploy cutting-edge technologies to reduce electricity usage and enhance business resilience. Details of these MoUs are described in the "Energy Efficiency" section.

During the Reporting Period, HTHKH launched several business solutions and case studies, such as enhancing waste recycling efficiency with IoT solutions, managed IT Service for SMEs providing professional assistance in network support, IT equipment maintenance, data security and cloud management.

Case 1: Business partners collaboration - 3Business EMPOWER Partnership Summit 2025



With the advancement in AI and 5G technology, HTHKH is able to bring new technological insights and inspiration into business operations, driving new opportunities and productivity. In September 2025, 3Business hosted the 3Business EMPOWER Partnership Summit 2025, a large-scale technology exhibition featuring over 20 leading tech giants including Microsoft, Google and Amazon Web Service, showcasing innovative corporate solutions using AI and 5G.

During the event, industry experts joined panel discussions to share their thoughts on trending

topics such as employee-AI collaboration, global connectivity X AI integration, low-altitude economy driven transformation of transportation, AI-driven (SME) digital transformation and smart building management. The Group also signed MOUs with partners to broaden the application of AI and 5G in areas such as AI - ESG collaboration to help enterprises meet compliance requirements, enhance operation efficiency in low-altitude transportation, smart building management and development of property technology.

Strategic MoU on Deployment of Cloud-native Intelligent Infrastructure

To enhance network efficiency, HTHKH and Huawei International Company Limited signed a strategic MoU in Shanghai during the Mobile World Congress 2025 to deploy AI and big data to enhance network operations and management. Powered by cloud-native intelligent infrastructure integrating AI, 5G and cloud capabilities, the system identifies anomalies and high-risk network scenarios, enabling proactive stress tests ahead of peak network periods such as holidays, major events and sport matches. It also enhances protection for critical scenarios such as emergency response, public service operations and the transmission of medical data.



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 Honey Bee network initiative, 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.

Figure 9: The Group's Performance Pledge - Network Availability and Service Restoration

Target	Parameter	General description	Performance target	2025 Actual performance
Network Availability	Availability of core network	Percentage of the uptime of the core network in an observation period	99.99%	100%
Service Restoration	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 Data Privacy and Cyber Security section) 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, anti-scam call services and digital footprint concealment enabled.

In response to the need for an anti-phishing solution, the Group offers Zone Alarm 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.

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 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. 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 customers' privacy. For more details, please refer to the "Data Privacy and Cyber Security" in the Governance section.

Art-tech

The Group is committed to driving sustainable business growth by investing in high-impact philanthropic and community initiatives aligned with its sustainability priorities and long-term value creation. Committed to making meaningful contributions to the community, the Group deploys its ultra fast, low latency and highly resilient network across a range of sectors, with a particular focus on the art and culture sector. The cutting-edge telecommunications technologies are beneficial to provide high connectivity to artwork with no boundaries. The Group will continue to explore strategic opportunities to support the arts and culture sector, contributing to cultural sustainability and community enrichment.

Case 2: Collaboration with Art Basel - 5G Network and Wi-Fi Support

HTHKH continued as the Official Partner of Art Basel Hong Kong 2025, providing dedicated 5G mobile broadband and a 5G smart people-counting solution to ensure seamless 5G connectivity for exhibitors at the premier international art fair.



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 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
- Climate-related disclosures
- Corporate Solutions and Innovations
- Circular Economy
- Natural Resources Protection

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 2025, the Group made notable progress in several areas to deliver sustainable business and solutions strategies. These areas are outlined on the next page.

Figure 10: Climate strategies

Initiatives	Strategies
Energy efficiency	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Reduce, reuse and recycle all forms of waste • Embed circular economy principles into products manufacturing • Engage customers in retail recycling campaigns • Launch new trade-in programme during the Reporting Period, provide instant online price valuation and home pickup, offer customers with more suitable and convenient recycling channels
Finance and investment	<ul style="list-style-type: none"> • Continue to manage capital expenditure towards a net-zero pathway
Supply chain engagement	<ul style="list-style-type: none"> • 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.

Figure 11: Sustainable Energy Efficiency Practices in 2025

Initiatives	Description
Pilot solar energy project	In 2025, HTHKH launched a pilot renewable energy project, marking the first significant step for the Group to explore the use of renewable energy. The Group will continue to carry out an availability study for implementing renewable energy in the future.
Energy audit	To understand the energy usage and efficiency in Hong Kong, energy audits were conducted during the Reporting Period by CLP Power Hong Kong Ltd and Hongkong Electric to analyse electricity consumption across its retail shops and offices. These assessments provide the groundwork for implementing future energy saving measures. The Group will continue to replace office chillers while deploying high energy-efficient equipment in retail shops.
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 selected base stations from indoor to outdoor locations to take advantage of natural cooling, and minimising air conditioning use at existing sites.
Replacement of higher energy efficient refrigerant	The Group continues to improve the performance of its cooling facilities. During the Reporting Period, the Group carried out the first phase of refrigerant ratio reallocation, reducing energy consumption and increasing operating efficiency. This replacement project will be carried out in phases over the next two years.
AI technology adoption	In 2024, HTHKH signed an MoU with Huawei International Company Limited to adopt AI energy-saving technology. AI-enabled energy-saving solutions were deployed in its base stations, enabling the system to automatically switch to sleep mode during low traffic period, achieving 'zero bit, zero watt'.

Initiatives	Description
Chiller replacement	<p>Mechanical ventilation and air conditioning 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.</p> <p>During the Reporting Period, the Group adopted environmentally friendly refrigerant and improved chiller maintenance, reinforcing the Group's electricity saving.</p>
Green office	<p>Throughout the offices, the Group has implemented Building Management System 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.</p> <p>Up to the end of Reporting Period, the Group replaced 100% of fluorescent tubes with Light Emitting Diode energy-saving tubes company-wide. In addition, the Group also encourages minimisation of printing, where compared to 2024, 5% fewer copies were printed during the Reporting Period.</p>
Electric vehicle adoption	<p>The Group is actively working towards transitioning to a more sustainable fleet by gradually expanding its electric vehicle pool to replace ageing gasoline cars.</p>

Climate-related disclosures

Governance

The Board plays a pivotal role in overseeing and evaluating the Group's climate-related issues, risk and opportunities, strategies, management approach and performance against goals and targets. The Board-level Sustainability Committee reports to and advises the Board on climate-related issues. It also delegates responsibilities to management-level sustainability working groups to review, monitor, and oversee climate-related issues, ensuring sufficient resources, skills and competencies are in place to manage climate-related risks and opportunities effectively. Both the Sustainability Committee and Sustainability Working Group hold meetings twice a year. For more details, please refer to the "Corporate Governance Report" of this Annual Report.

Sustainability Working Group comprises management-level staff from key business units to discuss and factor upcoming climate-related trends and regulatory requirements into strategic, operational and management decisions. Consequently, the Group establishes and implements climate-related policies and measures, continuously assessing their performance and effectiveness and report to the Board. In 2025, the Group conducted an assessment of its climate-related performance, establishing and monitoring internal KPIs to track progress and drive continuous improvement. Building on this foundation, the Group will explore integrating climate-related performance metrics into its remuneration framework to further align with sustainability objectives.

In addition, climate-related and sustainability-related risks and opportunities have long been integrated into the Group's risk management, business partner evaluation and financial planning processes. The Group will continue to adopt and strengthen these practices to align with the evolving regulatory trends and stakeholder expectations.

Strategy

The Group has identified potential risks and opportunities associated with climate change, alongside relevant strategies including risk mitigation measures to seize these opportunities.

Figure 12: Climate-related Risks and Opportunities Analysis

Risk Title	Shifts in customer preferences from lower climate related performance	Shifts in investor preferences from lower climate related performance	Transition to low emission technology
Type of Risk	Transition risk - reputation risk	Transition risk - reputation risk	Transition risk - technology risk
Affected Area	Business model	Business model	Value chain
Risk Description	Failing to keep the pace with shifting customer priorities including insufficient approach to climate change, failure to meet public commitments e.g. Net Zero by 2050 from Hong Kong's Climate Action Plan 2050 ⁽²⁾ and preferences towards sustainability (e.g., green bond finance) and carbon neutrality, may lead to a loss of customer confidence, severely impacting the Group's social license to operate	Failing to keep the pace with shifting investor priorities including insufficient approach to climate change, failure to meet public commitments e.g. Net Zero by 2050 from Hong Kong's Climate Action Plan 2050 ⁽²⁾ and preferences towards sustainability (e.g., green bond finance) and carbon neutrality, may lead to a loss of investor confidence and capital, an increased cost of capital as well as difficulties in raising and attaining new capital.	Lack of availability of low-carbon energy technology with growing consumption to meet demand for data traffic and automation, requiring additional time for research and potentially increasing costs of energy overall.
Timeframe	Medium-term	Medium-term	Medium-term
Financial Materiality	Low to medium	Low to medium	Low to medium
Financial Impact	Loss of market share	Reduced accessibility to capital from these investors and increased costs of capital	Increased operating costs
Response	The Group continues to deploy energy-saving solutions to address the growing demand for carbon reduction in operation. The Group will continue to enhance external communication to effectively demonstrate the Group's dedication to ESG-related issues.	The Group continues to deploy low-carbon solutions to address the growing demand for carbon reduction in operations. The Group will continue to enhance external communication to effectively demonstrate the Group's dedication to ESG-related issues.	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.

(2) Refers to "Hong Kong's Climate Action Plan 2050" launched by the Hong Kong Government in 2021.

The identification process incorporates the assessment of short-, medium- and long-term time horizons to evaluate potential financial impacts and to assign a financial materiality rating on a scale of low to high for impact quantification. The Group also defines and applies specific time horizons in assessing climate-related risks and opportunities. The short-term, medium-term, and long-term time horizons are defined as the reporting year (1 year), up to 5 years, and more than 5 years (extending up to 2050), respectively. The table below summarises the Group's climate-related risks and opportunities profile.

Increased severity of extreme weather events	Long-term shifts in climate patterns	Increased regulatory requirements
Acute physical risk	Chronic physical risk	Transition risk - policy and legal risks
Business model	Business model	Business model
Damage to telecommunication infrastructure, customer service premises, retail shops and premises for outsourced service (e.g. call centres) due to acute climate change-induced weather events (such as typhoons and rainstorms, high-intensity flooding) and subsequent service interruption may lead to detrimental impact on customer retention and decreased revenues. Acute climate impacts may also contribute to disruptions to supply chain, causing delays and disruptions to availability of products and services, therefore lowering revenues	Chronic changes in weather patterns (e.g. rising average temperatures) may cause higher costs of energy due to increased cooling requirements; increased maintenance costs and increased equipment replacement costs, e.g. more frequent replacement of HVAC, batteries and other heat sensitive components	Implementation of evolving and stringent regulatory requirements and policies by regulatory bodies and HKEx concerning climate change.
Short-term	Long-term	Long-term
Low to medium	Low to medium	Low
Increased operating costs	Increased operating costs	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.	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.	The Group develops a roadmap for adopting new international disclosure standards in order to mitigate potential cost escalation resulting from time constraints.
Besides, the deployment of cloud-native intelligent infrastructure enhanced the Group's connectivity and service efficiency, ensuring more resilient operations under climate-related impacts.	Besides, the deployment of cloud-native intelligent infrastructure enhanced the Group's connectivity and service efficiency, ensuring more resilient operations under climate-related impacts.	

Opportunity Title	Development of innovative 5G services focusing on climate related solutions	Shifts in customer preferences from higher climate related performance	Shifts in investor preferences from higher climate related performance	Deployment of low emission technology	Development of adaptive capacity to respond to climate change
Type of Opportunity	Market opportunities	Product and service opportunities	Resilience Opportunities	Energy source opportunity	Resilience Opportunities
Affected Area	Business model	Business model	Business model	Business model	Business model
Opportunity Description	Offering 5G technology solutions aimed at mitigating and adapting impacts of climate change, increasing revenues and enhancing climate resilience and energy efficiency	Innovation, development and launch of new low-emission products and services may improve competitive position and capitalise on shifting consumer preferences.	Implementation and achievement of strategies for climate transition and resilience may increase ability to attract investor capital and lower cost of capital	Adoption of carbon saving measures and low carbon energy options to strengthen sustainability performance and mitigate GHG emissions.	Investments in climate resilience may reduce the operational costs associated with service disruptions caused by acute climate change related weather events, and the costs of insurance.
Time Frame	Medium Term	Medium Term	Medium Term	Medium Term	Short Term
Financial Materiality	Low to medium	Low to medium	low	Low to medium	Low to medium
Financial Impact	Increased profit and revenue	Gain of market share	Increased accessibility to capital from these investors	Cost Reduction	Cost Reduction
Response	3Business is committed to providing state-of-the-art 5G solutions that address climate change challenges and enhance community resilience.	The Group robustly enhances ESG reporting disclosures as well as continues to deploy energy-saving solutions to captivate more customers.	The Group robustly enhances ESG reporting disclosures as well as continues to deploy energy-saving solutions to captivate more investors.	The Group is dedicated to collaborating with its suppliers to explore and implement low-emission technologies in operation and network equipment for energy saving.	3Business is committed to providing state-of-the-art 5G solutions that address climate change challenges and enhance community resilience.

During the Reporting Period, the Group actively participated in the pilot climate scenario project team led by our intermediate holding company, CKHGT. Through collaboration HTHKH assessed the potential financial materiality of climate-related risks and opportunities on the Group's operations and value chain. In doing so, HTHKH considered the potential significance of the risks and opportunities with reference to possible effects on revenues, costs and assets, and the likelihood of the risks and opportunities, in line with the established HTHKH risk scales.

In view of the increasing disclosure expectations and growing global awareness of climate-related performance, the Group has implemented various climate mitigation and adaptation measures in recent years to enhance climate resilience, reduce energy consumption and improve energy efficiency. These measures include the adoption of AI-power energy-saving solutions, cloud-based technologies, pilot solar panel installations, EcosIMs, energy audits, natural cooling solutions for cell sites, and use of AI for network optimisation. Benefitting from the emerging climate-related opportunities, the Group also launched climate-related corporate solutions for its customers to align with the growing business opportunities. The potential financial materiality of risks and opportunities are listed in the above tables.

Based on the Group's current assessment, climate-related risks and opportunities have not resulted in material financial effects, nor any material impact on the Group's assets or business activities in recent years. Looking ahead, while climate-related hazards may increase in frequency and severity, the Group does not presently anticipate material financial effects in the near term. This assessment remains subject to change as climate conditions, asset exposure profiles, and regulatory dynamics continue to evolve.

CKHGT has already launched its SBTi commitments, and HTHKH supports and contributes to achieving these targets. The Group is collecting and analysing climate-related financial data and is assessing the feasibility of procuring green energy certificates to offset electricity consumption in Hong Kong. The Group will publish its transition plan when appropriate.

Strategic MoU on Deployment of Cloud-native Intelligent Infrastructure - Improvement in network resilience and reliability

The cloud-native intelligent infrastructure not only enhances network efficiency but also strengthens network resilience. The AI-equipped system provides predictive capabilities that improve urban resilience and recovery capacity in the event of extreme weather, mega events or unforeseen incidents. It enables the Group to take rapid response actions during extreme weather events, demonstrating the Group's effort in leveraging cutting-edge technology to address climate change and ensure business continuity.

The Group will continue to collect and monitor climate-related financial information across its operations and value chain, with the long-term objective of developing a centralised database to support trend analysis, scenario modelling and appropriate disclosures. At this stage, the current and anticipated financial effects of climate-related risks and opportunities are not separately identifiable due to limitations in underlying data availability and the evolving nature of assessment methodologies. The Group will progressively enhance data coverage and quality, and refine the analytical frameworks required to quantify such financial effects in future reporting periods.

The Group has established a robust governance structure to oversee, review and monitor climate-related disclosures. It will continue to evaluate the financial effects of climate-related factors, assess the effectiveness of mitigation and adaptation measures, and engage with upstream and downstream business partners to explore advanced technologies that can reduce value chain carbon emissions and support corporate solutions.

Risk management

An effective enterprise risk management (“ERM”) framework is the key component of the Group’s governance, steering and empowering operational development while safeguarding corporate values. Building on this robust and effective ERM framework, sustainability and climate-related risk and opportunity factors have long been integrated into the ERM framework and played a significant role in corporate governance, operations and strategic decision-making processes.

ERM framework covers all the business units within the Group. A five steps risk assessment is conducted twice a year to obtain an overview of potential positive and negative effects of risk and opportunities factors. This assessment steps comprise identification, assessment, management, control and monitoring, as summarised below. For more details on the continuous ERM framework of the Group, please refer to the “Corporate Governance Report” of this Annual Report.

Risk identification	Business units identify risks by using techniques such as risk profiling, risk improvement surveys, discussions, site visits, audit review, health and safety report.
Risk assessment	Business units should identify the key risk sensitive areas and financial consequences, estimate the probability and frequency date, carry out analysis and determine measures to be implemented.
Risk management	Business units seek possible mitigation measures to address major risks, such as physical and liability risks through risk financing and transfer.
Risk control	Business units regularly appraise policy to comply with required standards. Appropriate modifications are made.
Risk monitoring	Business units should monitor the progress of the risk control measures.

In response to emerging regulatory trends in climate-related risks, new guidance has been provided for regular risk factor assessments during the Reporting Period. Criteria are established to determine whether relevant sustainability-related risks or opportunities should be included in the Group’s risk register, and guidelines are provided for mapping sustainability-related risks against the existing risk register.

Metrics and targets

Decarbonisation

The Group will continue to refine its internal methodologies to support the future quantification of the amount and percentage of assets or business activities that are vulnerable to transition risks and physical risks or aligned with climate-related opportunities where appropriate. The Group will also continue to implement mitigation and adaptation measures to reduce potential financial impacts and enhance operational resilience, supported by ongoing improvements in the quality and granularity of underlying data.

GHG emissions reduction target

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, carbon disclosure project ("CDP") and EcoVadis disclosure project. CKHGT achieved grade 'B' in CDP and has been awarded a silver medal by EcoVadis. HTHKH is honored to have contributed to these achievements. The Group remains committed to supporting and driving initiatives that will enable the Group and CKHGT to achieve a sustainable future.

Regarding sustainability-related data consistency and transparency, the Group also participated in CKHGT's 2024 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 and approved by SBTi in 2025. 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 2025
	Reduce GHG emissions per TB of data traffic (kgCO ₂ e per TB) by 70% by 2025 and 90% by 2030 versus a 2020 baseline	Achieved in 2025
	Reduce the annual growth rate in electricity consumption by 30% by 2030 versus a 2022 baseline	On track
Paper	Reduce annual paper usage by 2%	On track
	Reduce paper usage by 60% by 2030 versus a 2018 baseline	On track
	Reduce annual printing paper usage by 2%	On track
	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

The Group continues to actively monitor and assess opportunities to increase the share of renewable electricity in its energy supply such as through the procurement of Energy Attribute Certificates, with the aim of promoting green electricity deployment and mitigating scope 2 emissions. Looking ahead, HTHKH will conduct a study on leveraging carbon credits to further reduce scope 1 and 3 emissions, reinforcing its climate strategy and supporting the Group's long-term decarbonisation goals.

Corporate Solutions and Innovations

Recognising the growing awareness of ESG and climate-related topics among corporate operations, the Group adopts advanced technologies that help businesses achieve their environmental and ESG targets, in support of smart city development. In the past few years, HTHKH has launched 5G flood detection solution for smart car parks and electric vehicle charging solution, successfully fostering ESG development across society and corporate. During the Reporting Period, the Group launched an enhanced waste recycling solution leveraging IoT technology and solar-power cloud surveillance solution. These solutions integrated advanced technologies including AI, 5G, IoT and cloud, enhancing efficiency and accuracy.

Natural Resources Protection

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

Activities	Description
Earth Hour - Lights off for an hour	In support of WWF Earth Hour 2025, the Group launched the "Light off for an hour" campaign during which non-essential lights were switched off from 1-2 pm on 21 March 2025. This initiative encourages employees to participate in one hour of energy saving and raises awareness of environmental issues affecting our planet.
Skip-a-Meal 2025	To promote environmental and biodiversity awareness among employees and to support community investment initiatives, the Group collaborated with World Vision Hong Kong to organise the Skip-a-Meal event. Representatives from World Vision Hong Kong shared a documentary video on natural-based solutions and conducted a workshop that allowed employees to experience the challenges of obtaining water in water-scarce regions.
VeggieLab organic farming initiative	VeggieLab, the Group's rooftop organic farm, offers green spaces where staff can learn how to grow vegetables. Beyond promoting environmental greening and reducing carbon emissions, the initiative supports employees' work-life balance by 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 while encouraging sustainable water consumption behaviours.

Circular Economy

The Group has fully integrated the concept of a "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 was launched to minimise the Group's environmental impact and promote responsible consumption.

The Group's efforts were recognised by the Good Level Energywi\$e Certificate and Excellent 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	Descriptions
Recycling of <i>Lai See</i> packets and Mooncake boxes	Used <i>Lai See</i> packets and mooncake boxes were collected during the campaign and processed by an NGO for either reuse or recycling.
Green Office	The Group has incorporated the principles of reducing, reusing and recycling into 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.
Product Innovation	The EcoSIM 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, since 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 2025, the Group successfully recycled 48 tonnes of damaged or aged lead-acid batteries.

Customer engagement in circular economy

The Group launched a new handset trade-in programme, "Trade What! We'll Handle it All for you", during the Reporting Period. The programme provides instant online recycling price valuation for devices, enabling customers to access recycling service with greater ease and transparency. To encourage wider participation and enhance recycling incentives, HTHKH offers free data transfer services to assist customers in migrating information from their old devices to new device prior to recycling. In addition, third-party recycling partners provide convenient home pickup services to further reduce barriers for customers who wish to recycle their devices.

Apart from that, the Group continues to provide one-stop handset recycling services at selected 3Shops to 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, 324 pieces of electronic devices were collected from customers.

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

Attracting talent

The Group recognises the value of its human capital and is 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 Group continues to invest in young talent by providing a broad spectrum of cutting-edge training and development programmes designed to strengthen their competencies, enabling them to integrate effectively into the telecommunications sector. During the Reporting Period, the Group continued to provide job rotation opportunities and involvement in business projects, allowing young talents to experience different departmental functions, gain hands-on experience, and develop cross-functional exposure. These opportunities help accelerate their professional growth while broadening their perspectives across different business functions. The Group also developed a variety of training programmes, industrial visits, seminars and workshops to support skill development and promote knowledge sharing among talents.

In addition, the Group offers internships to nurture undergraduates aspiring to pursue careers in telecommunications. Students are provided with valuable practical experience and commercial awareness through involvement in various business projects, enabling them to gain real-world industry exposure. The Group aims to foster a sustainable talent pipeline for telecommunications industry and support community development.

Employment conditions and benefits

The Group strictly adheres to all applicable laws and regulations in the jurisdictions where it operates, ensuring these requirements 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.

The Group upholds the principles of fairness, diversity, and equal opportunity throughout its recruitment and employment practices. The Human Resources Department conducts interviews with a diverse pool of applicants during the recruitment process where factors such as age, race, gender, religion, creed, ethnicity, disability, sexual orientation and cultural background do not lead to unfavourable treatment or discrimination. Upon employment, the Group provides a remuneration and benefits framework that complies with labour laws in its operating jurisdictions, along with performance-based incentives and appropriate allowances to employees. Key policies regarding remuneration, statutory severance payment and long service payment and conflict of interest management are outlined in the employment contracts and the employee handbook.

Full-time employees are entitled to various leave benefits, in addition to statutory holidays and sick leave. To promote work-life balance for its employees, the Group has implemented significant enhancements to employees' leave entitlement. The Group also provide maternity and paternity leaves entitlement and payment that surpass the statutory requirements. 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, and a pension plan. In addition, an alternative pension scheme is offered to provide greater flexibility and support beyond statutory obligations. The Group also extends life insurance coverage and a preferential dental plan, both of which surpass statutory requirements. To strengthen its pay-for-performance culture, the Group conducts an annual salary review to support talent retention and ensure employee remuneration remains competitive within the industry.

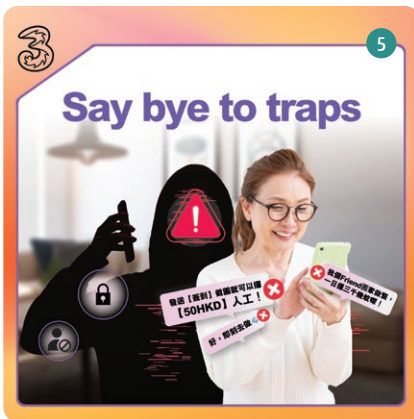
Employee Engagement

The Group values employee feedback and strives to foster a harmonious relationship with its employees. To facilitate internal communications, 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.

In 2025, the Group continued to organise the town hall meetings to further enhance internal communications. 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 during these sessions. By prioritising employee engagement through this event, the Group cultivates a stronger sense of collaborative working environment.

The Group respects employees and actively engages with them, ensuring they receive the support needed for their wellbeing and development. During the Reporting Period, the Group conducted several employee surveys focused on wellbeing and efficiency enhancements, including the operation enhancement survey and canteen services survey. Employees were invited to share their opinions and feedback on these topics.

The Group respects employees and actively engages with them, ensuring they receive the support needed for their wellbeing and development. During the Reporting Period, the Group conducted several employment surveys focused on wellbeing and efficiency enhancements, including the operation enhancement survey and canteen services survey. Employees were invited to share their opinions and feedback on these topics. In response to the survey results, the Group implemented and continues to pursue improvement initiatives aimed at enhancing operational efficiency, strengthen employees' capabilities and foster higher employee engagement. For example, in response to feedback on improving work efficiency and the increasing need for data analytics in daily operations, the Group provide data analytics tool training to employees. These initiatives not only streamline workflows and improve productivity but also enhance employee engagement by empowering employees with the skills and technologies needed to contribute effectively to the Group's strategic goals. Details of employee trainings are discussed below.



- 1 The Group offers free Dustykid cards at shops, inviting the public to share heartfelt messages of support with the Tai Po community.
- 2 At VeggieLab, the Group's rooftop organic farm, staff members can experience the joy of urban farming.
- 3 Staff members join the Staff Health Wellness Day as part of the Group's health and safety training.
- 4 The roofgarden of the Group's headquarters has become a green space where biodiversity quietly thrives.
- 5 The Group helps combat phone scams by offering seniors free call blocking services and sending anti-scam SMS messages to customers.
- 6 3Business welcomes students to DIGIBox, the Group's solution hub, where interactive workshops and seminars let them explore and experience the latest 5G applications.
- 7 The Group supports the Business School Partnership Programme by organising school visits where staff members share industry experience to guide students' career planning.



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.

The rapid development of 5G and AI technologies is accelerating business digital transformation and presenting significant technology opportunities for the telecommunications industry. To capture these opportunities, the Group organised several town hall meetings to discuss the future direction and outline the Group's digital transformation objectives. These sessions also served as a platform to engage employees, gather insights and ensure alignment across teams.

Capturing the technological opportunities brought by 5G and AI, the Group aims to cultivate a future-ready workforce. In response to employees' feedback highlighting the increasing need for digital transformation, data analytics and efficiency enhancement, the Group strengthened its AI- and automation-related training programmes in 2025, aiming to enhance the operational efficiency and upgrade employees' digital skillsets that support long-term business sustainability.

Performance appraisal

All employees participate in an annual performance appraisal through which they receive formal feedback on their strengths as well as areas for improvement. Additionally, direct managers work collaboratively with employees to set meaningful goals, creating a roadmap for success and personal development. This approach fosters two-way communications across different job levels and cultivates an environment where transparency, continuous improvement and development are central to everyone. Appraisal results serves as a key assessment factor in determining performance-based bonus, salary adjustment and promotions.

People development

To support the Group's business growth and employees' professional development, the Group continues to offer extensive learning and development opportunities. These initiatives help employees realise their potential, enhance their competencies, and improve their skills and knowledge. The training programmes are designed to provide appropriate and targeted training for employees across all organisational levels and functions. The programme structure enables the delivery of selective and relevant learning content tailored to different employee groups. In addition, individual departments and teams are encouraged to organise supplementary training activities to address their specific operational and development needs. Examples include soft skills training, talent programmes, management trainee programme, management-level training programme.

To further develop expertise in specific functional areas, employees are also assigned significant roles and participate in task force teams across different business units. These initiatives reinforce employee engagement 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 13: Training Provided to Employees

Categories	Training	Target
Orientation	<ul style="list-style-type: none"> • New Joiner Induction Programme • Site visits 	All new employees and interns
Modern Workplace Office Tools	<ul style="list-style-type: none"> • Data & Analytics Skills • Microsoft 365 Suite • Oracle Fusion Cloud Enterprise Applications 	<ul style="list-style-type: none"> • Nominated employees • All employees • Finance department
Compliance	<ul style="list-style-type: none"> • Cyber security awareness training • ICAC Integrity Talk • Key policies training • Trade Description Ordinance, Personal Data (Privacy) Ordinance, Competition Ordinance, Unsolicited Electronic Messages Ordinance Refreshment training 	<ul style="list-style-type: none"> • All employees • All employees • All employees • Selected responsible staff
Health and Safety	<ul style="list-style-type: none"> • First-aid training • Occupational health and safety talk • Staff Health Wellness Day 	<ul style="list-style-type: none"> • Nominated employees • All employees • All employees
Leadership/ management skills	<ul style="list-style-type: none"> • Competition Law Compliance for Business Executive • Competency skills training • Supervisory skills training series • Performance management • Project planning • Industrial visits and seminars 	Nominated employees

To encourage employees to further pursue professional development, advance their skills in emerging areas, stay updated with industry developments and obtain professional credentials, the Group provides subsidies for recognised training programmes as well as reimbursement for selected licence and examination fees. These initiatives aim to support employees in equipping themselves with the capabilities required to deliver quality service to customers.

The Group also actively supports employees in attending training programmes organised by external institutions. This fosters professional development and skill enhancement, allowing employees to gain fresh perspectives and expertise in respective fields. The Group nominated employees to attend a designated sustainability course to broaden their knowledge and expertise in this area, 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 its employees. The Group implements policies and initiatives that reflect the diverse communities it 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 established the Workforce Diversity Policy in 2025 and is committed to fostering a diverse and inclusive working environment where individual differences are respected and all employees are treated with dignity. The Policy upholds the principles of equal opportunities in recruitment, promotion and all conditions of employment. 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. To further deepen and strengthen the Group's inclusive practices, the Group organised a seminar titled "Hiring with Diversity" during the Reporting Period. The seminar provided important guidance and practical tips for managerial staff to support the Group's commitment to diverse and inclusive recruitment. It highlighted the significance of diversity and inclusion in the hiring process and introduced effective hiring practices and best-practice approaches.

The Sustainability Committee actively oversees the Group's workforce diversity and ensures the effective implementation of the Workforce Diversity Policy. The Committee also provides recommendations to the Board whenever necessary to ensure that all practices remain effective on an ongoing basis.

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.

Case 3: Promoting Inclusion and Diversity

In 2025, the Group strengthened its commitment to inclusion and diversity by collaborating with Gingko House, as its new canteen provider. Gingko House is a non-governmental organisation which aims to support elderly by providing employment opportunities in restaurant operations, enabling them to regain confidence, dignity and self-reliance. The Group is actively working towards its mission of creating a work environment that embraces diversity and empowers individuals from diverse backgrounds.



Photo: Courtesy of Gingko House

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 its 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 during 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 occupational health and safety talks focusing on musculoskeletal disorder and workplace desk exercises. The initiatives aimed to promote physical and mental well-being of employees, help them reduce occupational health and safety risk, improve concentration and enhance work efficiency.

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 obtained ISO 45001:2018 Occupational Health and Safety Management System certification for designated locations, demonstrating its 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 in determining the actions to eliminate the hazards in workplace and in reporting OHS risks.

Holistic wellbeing

The Group is committed to supporting employees' holistic well-being by fostering a healthy work-life balance. During the Reporting Period, a variety of leisure and wellness initiatives such as the Wellness Experience Day and Ocean Park Fun Bash were organised to enhance physical and mental health, strengthen staff cohesion and promote positive family relationships. These initiatives also help alleviate workplace stress and encourage communications and collaboration across teams.

Employee Wellness Experience Day



The Group priorities employee well-being and is dedicated to enhancing awareness of healthy lifestyle practices. With support from AS Watson, the Group organised the Employee Wellness Experience Day in 2025, revitalising employees through a range of wellness-focused activities.

The event featured expert-led wellness talks, on-site health assessments and interactive activities to promote physical and mental well-being.

Community Investment

Community contribution

The Group is committed to building lasting collaborations with the local community and charitable organisations through mutually beneficial programmes. While the Group makes donations and contributions in accordance with internal compliance guidelines and controls, its employees also participate in various volunteer activities. In 2025, the Group donated a total of HK\$21.7 million across various outreach initiatives focused on education, youth engagement and others, supporting and positively impacting community projects in Hong Kong and Macau.

Standing together with Tai Po



In November, a devastated fire rampaged Tai Po Wang Fuk Court. At the time of greatest need, the Group immediately extended the opening hour of a 3Shop in Tai Po and provided complimentary rentals for backup phones, 5G broadband routers, SIM cards and portable chargers. Service fees were subsequently waived, with extra local data, with an aim to help affected residents stay connected.

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

During that time of deep sorrow, HTHKH remained committed to fully supporting affected customers.

The Group has maintained the “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 14: Summary of the Group’s Contribution to Various Areas in the Community

Focus Areas	Activities
Cultural	<ul style="list-style-type: none"> Supported the Hong Kong Chinese Orchestra’s “A showcase of Parent-Child Works of Cheng Kwok Kong” and “Realms” concerts with a cash donation to strengthen the company’s ties with the arts and cultural sectors. HTHKH continued as the Official Partner of Art Basel Hong Kong 2025, providing dedicated 5G mobile broadband and a 5G smart people-counting solution to ensure seamless 5G connectivity for exhibitors at the premier international art fair.
Cyber Security	<ul style="list-style-type: none"> Helped combat phone scams by offering customers aged 60 or above the free Incoming Calls Management Pack to block scam and nuisance calls. Helped the Hong Kong Police Force by delivering anti-scam SMS messages free of charge on a quarterly basis throughout the year.
Digital Inclusion	<ul style="list-style-type: none"> Supported senior citizens through the <i>Lo-Yau-Kee</i> Monthly Service Plans Sponsorship Programme and catered to the communication needs of vulnerable groups at the Tung Wah Group of Hospitals CEASE Crisis Centre with the provision of one-year free service plans. HTHK participated in the Business-School Partnership Programme, organised by the Hong Kong General Chamber of Commerce, for the 7th consecutive year.
Others	<p>By providing free publicity via multimedia messaging service (“MMS”), the Group supported charitable organisations in fundraising events, sport activities, health promotions and social welfare programmes including:</p> <ul style="list-style-type: none"> PHAB Festival and Carnival organised by the Hong Kong PHAB Association The 60th Anniversary Raffle Tickets Charity Sales organised by the Hong Kong Blind Union A Bit More than Arts Festival organised by the Arts with the Disabled Association Hong Kong A charity walk organised by The Society for AIDS Care Walk for Nature of the World Wide Fund for Nature Hong Kong Hats On Day organised by the Children’s Cancer Foundation Myanmar Earthquake Relief and Skip-a-Meal of the World Vision Hong Kong Lok-lok & Yiu-yiu Sponsorship Scheme and Christmas Blessing Campaign organised by SKH St Christopher’s Home Charity walk and drawing competition organised by Seedland Educational Charitable Foundation World Sight Day of The Fred Hollows Foundation (Hong Kong) Cookie Campaign of the Helping Hand The 28th Great Chefs of Hong Kong organised by Heep Hong Society YO Dancical & YO Charity Basketball Tournament of Youth Outreach Hong Chi Climbathon of Hong Chi Association Barrier Busters of The Hong Kong Society for Rehabilitation Abolishing Child Marriage: Let Girls Fly Campaign of Plan International Hong Kong

Environmental KPIs

	Unit	2023	2024	2025
GHG emissions ^{(1) (2)}				
Total scope 1 + 2 GHG emissions (location-based)	tonne CO ₂ e	109,598	117,628	109,535
Total scope 1 + 2 GHG emissions (market-based)	tonne CO ₂ e	80,424	85,007	80,359
Scope 1 GHG emissions ⁽³⁾	tonne CO ₂ e	1,394	2,450	657
Scope 2 GHG emissions (location-based)	tonne CO ₂ e	108,204	115,179	108,878
Scope 2 GHG emissions (market-based) ⁽⁴⁾	tonne CO ₂ e	79,030	82,558	79,701
Scope 3 GHG emissions ^{(5) (6)}	tonne CO ₂ e	N/A	1,074	1,064
Total scope 1 + 2 GHG emissions (location-based) intensity	tonne CO ₂ e/revenue HK\$'000	0.022	0.025	0.020
Total scope 1 + 2 GHG emissions (market-based) intensity	tonne CO ₂ e/revenue HK\$'000	0.016	0.018	0.014
Scope 1 GHG emissions intensity	tonne CO ₂ e/revenue HK\$'000	0.000	0.001	0.000
Scope 2 GHG emissions (location-based) intensity	tonne CO ₂ e/revenue HK\$'000	0.022	0.024	0.020
Scope 2 GHG emissions (market-based) intensity	tonne CO ₂ e/revenue HK\$'000	0.016	0.017	0.014
Use of energy ^{(1) (2)}				
Total energy consumption	000' kWh	169,527	179,328	181,312
Total direct energy consumption	000' kWh	182	128	78
Diesel/Gasoline/Petrol ⁽⁷⁾	000' kWh	182	128	78
Indirect energy consumption	000' kWh	169,345	179,200	181,234
Electricity	000' kWh	169,345	179,200	181,234
Total energy consumption intensity	kWh/revenue HK\$'000	34.62	37.50	32.51
Direct energy consumption intensity	kWh/revenue HK\$'000	0.03	0.03	0.01
Indirect energy consumption intensity	kWh/revenue HK\$'000	34.59	37.47	32.49
Air emissions				
NOx emissions	tonne	0.02	0.03	0.02
SOx emissions	tonne	0.00	0.00	0.00
Particulate matter emissions	tonne	0.00	0.00	0.00

Environmental KPIs (Continued)

	Unit	2023	2024	2025
Waste produced				
Total hazardous waste produced ⁽⁸⁾	tonne	72	21	52
Total hazardous waste produced intensity	kg/revenue HK\$'000	0.01	0.00	0.01
Total non-hazardous waste produced	tonne	39	41	45
Total non-hazardous waste produced intensity	kg/revenue HK\$'000	0.01	0.00	0.01
Waste recycled				
Paper	tonnes	8	9	14
Solid waste ⁽⁹⁾	tonnes	1.04	1.85	2.03
Batteries	tonnes	67	21	48
Electronic equipment	pieces	312	494	1,858
Use of water				
Water consumption	m ³	3,754	3,899	5,236
Water consumption intensity	m ³ /revenue HK\$'000	0.001	0.001	0.001
Packaging material ⁽¹⁰⁾				
Total packaging material used for finished products	tonne	23.22	17.17	11.59
Plastic	tonne	21.43	15.35	11.26
Paper	tonne	1.34	1.49	0.07
Metal	tonne	0.046	0.33	0.26
Packaging material intensity	tonne/product '000	0.004	0.004	0.004

Notes:

(1) The calculation of scope 1 and 2 GHG emissions data is based on the GHG Protocol, relevant emission factors were sourced from environmentally-extended input output ("EIO") database and the UK Government GHG Conversion Factors for Company Reporting.

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 2025.

(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 2024 sustainability reports.

(3) The decrease in scope 1 emissions was mainly driven by the decrease 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) The decrease in scope 2 emissions was primarily attributable to lower electricity emission factors from CLP and HKE.

(5) Scope 3 emissions included emissions from waste generated in operations (category 5), business travel (category 6), employee commuting (category 7) and franchises (category 14).

(6) The compilation of the Group's 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 EIO database and the UK Government GHG Conversion Factors for Company Reporting.

(7) The decrease in gasoline and fuel consumption was driven by the disposal of company vehicle and maintenance of vehicles during 2025.

(8) The increase in hazardous waste was mainly driven by the increase in battery waste, such variance is considered as normal fluctuation since the disposal of batteries is irregularly scheduled.

(9) Solid waste recycled includes cans, glass, beverage cartons and plastic bottles from office operation.

(10) The decrease in packaging material was mainly driven by the decrease in SIM card purchasing due to sufficient inventory level.

Social KPIs

		2023	2024	2025
Number of employees				
Total		1,240	1,181	1,182
By employment type	Full-time	1,157	1,105	1,102
	Part-time	83	76	80
Number of full-time employees				
By gender	Male	687	664	669
	Female	470	441	433
By employee category	Manager grade or above	118	110	109
	General staff	1,039	995	993
By age group	Under 30	174	160	137
	30-49	706	674	669
	50 or above	277	271	296
By geographical region	Hong Kong	1,061	1,020	1,019
	Chinese Mainland	96	85	83
Turnover rate for full-time employees				
Overall		32%	31%	23%
By gender	Male	33%	34%	23%
	Female	31%	27%	23%
By age group	Under 30	49%	43%	35%
	30-49	34%	30%	23%
	50 or above	17%	28%	17%
By geographical region	Hong Kong	34%	32%	24%
	Chinese Mainland	17%	21%	13%

Social KPIs (Continued)

		2023	2024	2025
Lost days due to work fatalities				
Number of lost days due to work fatalities		-	-	-
By employee type	Full-time employees	-	-	-
	Contractors	-	-	-
Rate of work-related fatalities		-	-	-
Lost days due to work injury ⁽¹¹⁾				
Number of lost days due to work injury		72	697	703
Number of lost time injury incidents		2	8	6
Percentage of full-time employees who received training				
Overall		89%	88%	93%
By gender	Male	60%	61%	61%
	Female	40%	39%	39%
By employee category	Manager grade or above	9%	10%	10%
	General staff	91%	90%	90%
Average hours of training completed by full-time employees				
Overall		22 hours	23 hours	26 hours
By gender	Male	25 hours	24 hours	26 hours
	Female	18 hours	21 hours	25 hours
By employee category	Manager grade or above	19 hours	21 hours	27 hours
	General staff	22 hours	23 hours	26 hours

Note:

(11) 2025 included one case carried over from 2024, three major injury cases contributing to 580 days out of 703 days which occurred in Hong Kong.

Social KPIs (Continued)

		2023	2024	2025
Number of suppliers				
Total		724	666	698
By geographical region	Hong Kong	379	315	465
	Chinese Mainland	327	333	185
	Europe	6	8	7
	Canada	-	-	1
	Asia, Australia & Others	12	10	40
Percentage of total product sold or shipped subject to recalls for safety and health reasons				
Percentage of total product sold or shipped subject to recalls for safety and health reasons		-	-	-
Number of complaints received				
Products related		N/A	N/A	N/A
Services related		11,475	12,454	8,737
Number of concluded legal cases regarding corrupt practices				
Brought against the Group		-	-	-
Brought against employees		-	-	-
Full-time and part-time employees who received training on anti-corruption/ethics and integrity				
Total		1,135	1,092	1,079
By employment type	Full-time	1,084	1,047	1,059
	Part-time	51	45	20
Percentage of full-time and part-time employees who received training on anti-corruption/ethics and integrity		92%	92%	91%
Number of training hours on anti-corruption/ethics and integrity completed by full-time and part-time employees				
Total		378	2,190	2,338
By employment type	Full-time	361	2,094	2,298
	Part-time	17	96	40

HKEX ESG Guide Content Index

Indicators	Section
Governance structure	
<p>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.</p>	
Mandatory Disclosure Requirements	
<p>A statement from the board containing the following elements:</p> <ul style="list-style-type: none"> (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, prioritise 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. 	<p>Governance - Integrated Governance Structure</p>
Reporting principles	
<p>A description of, or an explanation on, the application of the following Reporting Principles in the preparation of the ESG report:</p> <p>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 stakeholders identified, and the process and results of the issuer's stakeholder engagement.</p> <p>Quantitative: Information on the standards, methodologies, assumptions and/or calculation tools used, and source of conversion factors used, for the reporting of emissions/energy consumption (where applicable) should be disclosed.</p> <p>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.</p>	<p>About this Report - Reporting principles</p>
Reporting Boundary	
<p>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.</p>	<p>About this Report - Reporting scope</p>

A. Environmental			
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 A1.3	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		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

A. Environmental (Continued)			
Subject Areas, Aspects, General Disclosures and KPIs	Corresponding GRI Reference	Topic	Reporting Section
A2 Use of Resources			
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 302-1 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
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.	Decarbonisation - GHG Emissions Reduction Targets; Climate Action; Energy Efficiency
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 Environment 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

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

B. Social (Continued)			
Subject Areas, Aspects, General Disclosures and KPIs	Corresponding GRI Reference	Topic	Reporting Section
Employment and Labour Practices (Continued)			
B2 Health and Safety			
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

B. Social (Continued)			
Subject Areas, Aspects, General Disclosures and KPIs	Corresponding GRI Reference	Topic	Reporting Section
Employment and Labour Practices (Continued)			
B3 Development 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 Development
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 Standards			
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 Rights
KPI B4.2	3-3 Management of material topics	Description of steps taken to eliminate such practices when discovered.	Talent Attraction; Labour and Human Rights; Whistleblowing

B. Social (Continued)			
Subject Areas, Aspects, General Disclosures and KPIs	Corresponding GRI Reference	Topic	Reporting Section
Operating Practices			
B5 Supply Chain Management			
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
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

B. Social (Continued)			
Subject Areas, Aspects, General Disclosures and KPIs	Corresponding GRI Reference	Topic	Reporting Section
Operating Practices (Continued)			
B6 Product Responsibility			
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

B. Social (Continued)			
Subject Areas, Aspects, General Disclosures and KPIs	Corresponding GRI Reference	Topic	Reporting Section
Operating Practices (Continued)			
B7 Anti-corruption			
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 - Whistleblowing
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 - Communication and training

B. Social (Continued)			
Subject Areas, Aspects, General Disclosures and KPIs	Corresponding GRI Reference	Topic	Reporting Section
Community			
B8 Community Investment			
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

C. Climate-related Disclosure		
Reference paragraph	Description	Reporting Section
(I) Governance		
19	<p>An issuer shall disclose information about:</p> <p>(a) the governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) responsible for oversight of climate related risks and opportunities. Specifically, the issuer shall identify that body(s) or individual(s) and disclose information about:</p> <p>(i) how the body(s) or individual(s) determines whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to climate-related risks and opportunities;</p> <p>(ii) how and how often the body(s) or individual(s) is informed about climate related risks and opportunities;</p> <p>(iii) how the body(s) or individual(s) takes into account climate-related risks and opportunities when overseeing the issuer's strategy, its decisions on major transactions, and its risk management processes and related policies, including whether the body(s) or individual(s) has considered trade-offs associated with those risks and opportunities;</p> <p>(iv) how the body(s) or individual(s) oversees the setting of, and monitors progress towards, targets related to climate-related risks and opportunities (see paragraphs 37 to 40), including whether and how related performance metrics are included in remuneration policies (see paragraph 35); and</p> <p>(b) management's role in the governance processes, controls and procedures used to monitor, manage and oversee climate-related risks and opportunities, including information about:</p> <p>(i) whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee; and</p> <p>(ii) whether management uses controls and procedures to support the oversight of climate-related risks and opportunities and, if so, how these controls and procedures are integrated with other internal functions.</p>	Climate-related disclosures - Governance

C. Climate-related Disclosure (Continued)		
Reference paragraph	Description	Reporting Section
(II) Strategy		
Climate-related risks and opportunities		
20	<p>An issuer shall disclose information to enable an understanding of climate-related risks and opportunities that could reasonably be expected to affect the issuer's cash flows, its access to finance or cost of capital over the short, medium or long term. Specifically, the issuer shall:</p> <ul style="list-style-type: none"> (a) describe climate-related risks and opportunities that could reasonably be expected to affect the issuer's cash flows, its access to finance or cost of capital over the short, medium or long term; (b) explain, for each climate-related risk the issuer has identified, whether the issuer considers the risk to be a climate-related physical risk or climate-related transition risk; (c) specify, for each climate-related risk and opportunity the issuer has identified, over which time horizons - short, medium or long term - the effects of each climate-related risk and opportunity could reasonably be expected to occur; (d) and explain how the issuer defines 'short term', 'medium term' and 'long term' and how these definitions are linked to the planning horizons used by the issuer for strategic decision-making. 	Climate-related disclosures - Strategy
Business model and value chain		
21	<p>An issuer shall disclose information that enables an understanding of the current and anticipated effects of climate-related risks and opportunities on the issuer's business model and value chain. Specifically, the issuer shall disclose:</p> <ul style="list-style-type: none"> (a) a description of the current and anticipated effects of climate-related risks and opportunities on the issuer's business model and value chain; and (b) a description of where in the issuer's business model and value chain climate related risks and opportunities are concentrated (for example, geographical areas, facilities and types of assets). 	Climate-related disclosures - Strategy

C. Climate-related Disclosure (Continued)		
Reference paragraph	Description	Reporting Section
(II) Strategy (Continued)		
Strategy and decision-making		
22	<p>An issuer shall disclose information that enables an understanding of the effects of climate-related risks and opportunities on its strategy and decision-making. Specifically, the issuer shall disclose:</p> <p>(a) information about how the issuer has responded to, and plans to respond to, climate-related risks and opportunities in its strategy and decision-making, including how the issuer plans to achieve any climate-related targets it has set and any targets it is required to meet by law or regulation. Specifically, the issuer shall disclose information about:</p> <p>(i) current and anticipated changes to the issuer's business model, including its resource allocation, to address climate-related risks and opportunities;</p> <p>(ii) current and anticipated adaptation and mitigation efforts (whether direct or indirect);</p> <p>(iii) any climate-related transition plan the issuer has (including information about key assumptions used in developing its transition plan, and dependencies on which the issuer's transition plan relies), or an appropriate negative statement where the issuer does not have a climate-related transition plan; and</p> <p>(iv) how the issuer plans to achieve any climate-related targets (including any greenhouse gas emissions targets (if any)), described in accordance with paragraphs 37 to 40; and</p> <p>(b) information about how the issuer is resourcing, and plans to resource, the activities disclosed in accordance with paragraph 22(a).</p>	Climate-related disclosures - Strategy
23	<p>An issuer shall disclose information about the progress of plans disclosed in previous reporting periods in accordance with paragraph 22(a).</p>	Climate-related disclosures - Strategy

C. Climate-related Disclosure (Continued)		
Reference paragraph	Description	Reporting Section
(II) Strategy (Continued)		
Financial position, financial performance and cash flows		
Current financial effect		
24	<p>An issuer shall disclose qualitative and quantitative information about:</p> <ul style="list-style-type: none"> (a) how climate-related risks and opportunities have affected its financial position, financial performance and cash flows for the reporting period; and (b) the climate-related risks and opportunities identified in paragraph 24(a) for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements. 	The current and anticipated financial effects of climate-related risks and opportunities are not separately identifiable.
Anticipated financial effect		
25	<p>The issuer shall provide qualitative and quantitative disclosures about:</p> <ul style="list-style-type: none"> (a) how the issuer expects its financial position to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities, taking into consideration: <ul style="list-style-type: none"> (i) its investment and disposal plans; (ii) and its planned sources of funding to implement its strategy; and (b) how the issuer expects its financial performance and cash flows to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities. 	The current and anticipated financial effects of climate-related risks and opportunities are not separately identifiable.

c. Climate-related Disclosure (Continued)		
Reference paragraph	Description	Reporting Section
(II) Strategy (Continued)		
Climate resilience		
26	<p>An issuer shall disclose information that enables an understanding of the resilience of the issuer's strategy and business model to climate-related changes, developments and uncertainties, taking into consideration the issuer's identified climate-related risks and opportunities. An issuer shall use climate-related scenario analysis to assess its climate resilience using an approach that is commensurate with an issuer's circumstances. In providing quantitative information, the issuer may disclose a single amount or a range. Specifically, the issuer shall disclose:</p> <p>(a) the issuer's assessment of its climate resilience as at the reporting date, which shall enable an understanding of:</p> <ul style="list-style-type: none"> (i) the implications, if any, of the issuer's assessment for its strategy and business model, including how the issuer would need to respond to the effects identified in the climate-related scenario analysis; (ii) the significant areas of uncertainty considered in the issuer's assessment of its climate resilience; and (iii) the issuer's capacity to adjust, or adapt its strategy and business model to climate change over the short, medium or long term; <p>(b) how and when the climate-related scenario analysis was carried out, including:</p> <ul style="list-style-type: none"> (i) information about the inputs used, including: <ul style="list-style-type: none"> (1) which climate-related scenarios the issuer used for the analysis and the sources of such scenarios; (2) whether the analysis included a diverse range of climate-related scenarios; (3) whether the climate-related scenarios used for the analysis are associated with climate-related transition risks or climate-related physical risks; (4) whether the issuer used, among its scenarios, a climate-related scenario aligned with the latest international agreement on climate change; (5) why the issuer decided that its chosen climate-related scenarios are relevant to assessing its resilience to climate-related changes, developments or uncertainties; (6) time horizons the issuer used in the analysis; and (7) what scope of operations the issuer used in the analysis (for example, the operation, locations and business units used in the analysis); (ii) the key assumptions the issuer made in the analysis; and (iii) the reporting period in which the climate-related scenario analysis was carried out. 	Reasonable Information Relief ^(1.1)

^(1.1) Since the current and anticipated financial effects of a climate-related risk and opportunity are not separately identifiable, quantitative information will not be provided in this Report. Based on historical data, the financial impact of climate-related risks and opportunities has been insignificant.

C. Climate-related Disclosure (Continued)		
Reference paragraph	Description	Reporting Section
(III) Risk Management		
27	<p>An issuer shall disclose information about:</p> <ul style="list-style-type: none"> (a) the processes and related policies it uses to identify, assess, prioritise and monitor climate-related risks, including information about: <ul style="list-style-type: none"> (i) the inputs and parameters the issuer uses (for example, information about data sources and the scope of operations covered in the processes); (ii) whether and how the issuer uses climate-related scenario analysis to inform its identification of climate-related risks; (iii) how the issuer assesses the nature, likelihood and magnitude of the effects of those risks (for example, whether the issuer considers qualitative factors, quantitative thresholds or other criteria); (iv) whether and how the issuer prioritises climate-related risks relative to other types of risks; (v) how the issuer monitors climate-related risks; and (vi) whether and how the issuer has changed the processes it uses compared with the previous reporting period; (b) the processes the issuer uses to identify, assess, prioritise and monitor climate related opportunities (including information about whether and how the issuer uses climate-related scenario analysis to inform its identification of climate-related opportunities); and (c) the extent to which, and how, the processes for identifying, assessing, prioritising and monitoring climate-related risks and opportunities are integrated into and inform the issuer's overall risk management process. 	Climate-related disclosures - Risk Management
(IV) Metrics and Targets		
Greenhouse gas emissions		
28	<p>An issuer shall disclose its absolute gross greenhouse gas emissions generated during the reporting period, expressed as metric tons of CO₂ equivalent, classified as:</p> <ul style="list-style-type: none"> (a) Scope 1 greenhouse gas emissions; (b) Scope 2 greenhouse gas emissions; and (c) Scope 3 greenhouse gas emissions. 	Climate-related disclosures - Metrics and Targets

C. Climate-related Disclosure (Continued)		
Reference paragraph	Description	Reporting Section
(IV) Metrics and Targets (Continued)		
Greenhouse gas emissions (Continued)		
29	<p>An issuer shall:</p> <ul style="list-style-type: none"> (a) measure its greenhouse gas emissions in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) unless required by a jurisdictional authority or another exchange on which the issuer is listed to use a different method for measuring greenhouse gas emissions; (b) disclose the approach it uses to measure its greenhouse gas emissions including: <ul style="list-style-type: none"> (i) the measurement approach, inputs and assumptions the issuer uses to measure its greenhouse gas emissions; (ii) the reason why the issuer has chosen the measurement approach, inputs and assumptions it uses to measure its greenhouse gas emissions; and (iii) any changes the issuer made to the measurement approach, inputs and assumptions during the reporting period and the reasons for those changes; (c) for Scope 2 greenhouse gas emissions disclosed in accordance with paragraph 28(b), disclose its location-based Scope 2 greenhouse gas emissions, and provide information about any contractual instruments that is necessary to enable an understanding of the issuer's Scope 2 greenhouse gas emissions; and (d) for Scope 3 greenhouse gas emissions disclosed in accordance with paragraph 28(c), disclose the categories included within the issuer's measure of Scope 3 greenhouse gas emissions, in accordance with the Scope 3 categories described in the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011). 	Climate-related disclosures - Metrics and Targets
30	An issuer shall disclose the amount and percentage of assets or business activities vulnerable to climate-related transition risks.	Reasonable Information Relief ^(1,2)
Climate-related physical risks		
31	An issuer shall disclose the amount and percentage of assets or business activities vulnerable to climate-related physical risks.	Reasonable Information Relief ^(1,2)

^(1,2) The Group requires additional time and system enhancements to collect, validate and model the necessary data ensuring accurate and reliable reporting. The disclosures will be provided once the relevant data processes and methodologies are fully established.

C. Climate-related Disclosure (Continued)		
Reference paragraph	Description	Reporting Section
(IV) Metrics and Targets (Continued)		
Climate-related opportunities		
32	An issuer shall disclose the amount and percentage of assets or business activities aligned with climate-related opportunities.	Reasonable Information Relief ^(1.2)
Capital deployment		
33	An issuer shall disclose the amount of capital expenditure, financing or investment deployed towards climate-related risks and opportunities.	Reasonable Information Relief ^(1.1)
Internal carbon prices		
34	An issuer shall disclose: (a) an explanation of whether and how the issuer is applying a carbon price in decision making (for example, investment decisions, transfer pricing, and scenario analysis); and (b) the price of each metric tonne of greenhouse gas emissions the issuer uses to assess the costs of its greenhouse gas emissions; or an appropriate negative statement that the issuer does not apply a carbon price in decision-making.	The Group does not currently have relevant policies in place.
Remuneration		
35	An issuer shall disclose whether and how climate-related considerations are factored into remuneration policy, or an appropriate negative statement. This may form part of the disclosure under paragraph 19(a)(iv).	The Group does not currently have relevant policies in place. The Group will continue to study and explore the potential implementation of remuneration policy.

^(1.1) Since the current and anticipated financial effects of a climate-related risk and opportunity are not separately identifiable, quantitative information will not be provided in this Report. Based on historical data, the financial impact of climate-related risks and opportunities has been insignificant.

^(1.2) The Group requires additional time and system enhancements to collect, validate and model the necessary data ensuring accurate and reliable reporting. The disclosures will be provided once the relevant data processes and methodologies are fully established.

C. Climate-related Disclosure (Continued)		
Reference paragraph	Description	Reporting Section
(IV) Metrics and Targets (Continued)		
Industry-based metrics		
36	An issuer is encouraged to disclose industry-based metrics that are associated with one or more particular business models, activities or other common features that characterise participation in an industry. In determining the industry-based metrics that the issuer discloses, an issuer is encouraged to refer to and consider the applicability of the industry based metrics associated with disclosure topics described in the IFRS S2 Industry based Guidance on implementing Climate-related Disclosures and other industry-based disclosure requirements prescribed under other international ESG reporting frameworks.	Not applicable
Climate-related targets		
37	An issuer shall disclose (a) the qualitative and quantitative climate-related targets the issuer has set to monitor progress towards achieving its strategic goals; and (b) any targets the issuer is required to meet by law or regulation, including any greenhouse gas emissions targets. For each target, the issuer shall disclose: <ul style="list-style-type: none"> (a) the metric used to set the target; (b) the objective of the target (for example, mitigation, adaptation or conformance with science-based initiatives); (c) the part of the issuer to which the target applies (for example, whether the target applies to the issuer in its entirety or only a part of the issuer, such as a specific business unit or geographic region); (d) the period over which the target applies; (e) the base period from which progress is measured; (f) milestones or interim targets (if any); (g) if the target is quantitative, whether the target is an absolute target or an intensity target; and (h) how the latest international agreement on climate change, including jurisdictional commitments that arise from that agreement, has informed the target. 	Climate-related disclosures - Metrics and Targets
38	An issuer shall disclose information about its approach to setting and reviewing each target, and how it monitors progress against each target, including: <ul style="list-style-type: none"> (a) whether the target and the methodology for setting the target has been validated by a third party; (b) the issuer's processes for reviewing the target; (c) the metrics used to monitor progress towards reaching the target; and (d) any revisions to the target and an explanation for those revisions. 	Climate-related disclosures - Metrics and Targets

C. Climate-related Disclosure (Continued)		
Reference paragraph	Description	Reporting Section
(IV) Metrics and Targets (Continued)		
Climate-related targets (Continued)		
39	An issuer shall disclose information about its performance against each climate-related target and an analysis of trends or changes in the issuer's performance.	Climate-related disclosures - Metrics and Targets
40	<p>For each greenhouse gas emissions target disclosed in accordance with paragraphs 37 to 39, an issuer shall disclose:</p> <ul style="list-style-type: none"> (a) which greenhouse gases are covered by the target; (b) whether Scope 1, Scope 2 or Scope 3 greenhouse gas emissions are covered by the target; (c) whether the target is a gross greenhouse gas emissions target or a net greenhouse gas emissions target. If the issuer discloses a net greenhouse gas emissions target, the issuer is also required to separately disclose its associated gross greenhouse gas emissions target; (d) whether the target was derived using a sectoral decarbonisation approach; and (e) the issuer's planned use of carbon credits to offset greenhouse gas emissions to achieve any net greenhouse gas emissions target. In explaining its planned use of carbon credits, the issuer shall disclose: <ul style="list-style-type: none"> (i) the extent to which, and how, achieving any net greenhouse gas emissions target relies on the use of carbon credits; (ii) which third-party scheme(s) will verify or certify the carbon credits; (iii) the type of carbon credit, including whether the underlying offset will be nature-based or based on technological carbon removals, and whether the underlying offset is achieved through carbon reduction or removal; and (iv) any other factors necessary to enable an understanding of the credibility and integrity of the carbon credits the issuer plans to use (for example, assumptions regarding the permanence of the carbon offset). 	Climate-related disclosures - Metrics and Targets
Applicability of cross-industry metrics and industry-based metrics		
41	In preparing disclosures to meet the requirements in paragraphs 21 to 26 and 37 to 38, an issuer shall refer to and consider the applicability of cross-industry metrics (see paragraphs 28 to 35) and (ii) industry-based metrics (see paragraph 36).	Not applicable