

The background of the entire page is a photograph of a large, mature tree with a thick, gnarled trunk and a dense canopy of green leaves. The tree is situated in a grassy park area. In the background, a city skyline with several high-rise buildings is visible under a clear blue sky with some light clouds. The tree's shadow is cast on the ground in front of it. There are some decorative graphic elements: a series of curved, parallel lines in shades of blue and white on the left side, and another set of similar lines on the right side, both curving upwards and outwards.

# HKT

## Environmental, Social and Governance Report 2024

Stock code: 6823

a **PCCW** Group member



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# 1 Sustainability at HKT

## 1.1 Group Managing Director's Message

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As Hong Kong's leading technology solutions enabler, HKT believes in the power of innovation to drive a sustainable future. We are committed to environmental, social and governance ("ESG") principles, integrating them into our operations to strengthen corporate governance, create societal value and raise awareness on environmental protection among the community. This commitment is evident in our use of technology to advance connectivity and bridge the digital divide, empowering the broader community to thrive in a connected world.

Our focus on robust governance stems from a deep understanding of the critical role it plays in safeguarding our operations and stakeholder interest. Integrity, transparency and ethical practices form not only the bedrock of our business, but also essential pillars upon which we build trust with stakeholders. We adhere to high standards and best practices, particularly in cybersecurity and privacy protection, with continuous enhancements to our policies, frameworks and capabilities to bolster resilience against emerging vulnerabilities. Our comprehensive training programmes equip our teams with the necessary knowledge and skills to stay vigilant and adapt to ever-changing technology and its relevant risks, reinforcing our commitment to responsible data stewardship.

Our collaborative approach to social impact combines internal empowerment with community enrichment to bridge the digital divide. We are upskilling our people for the future through our GenAI Incubation Programme, providing the tools to help refocusing their efforts on more rewarding work. In the anticipation of future challenges, we are preparing our workforce for the rapidly evolving landscape of technology and innovation. Externally, we are enhancing the digital fluency of the broader community, from university talks on emerging technologies for students to smartphone workshops for seniors and AI application trainings to our customers. We will continue to apply our expertise and resources to foster an inclusive, tech-enabled society for collective growth.

Envisioning a healthier environment for all, we are leveraging the power of artificial intelligence ("AI") and internet of things ("IoT") to set new benchmarks in environmental stewardship. Our smart energy management system, powered by advanced technologies, has achieved substantial reductions in greenhouse gas emissions. By extending these solutions to enterprise customers, we aim to create a multiplier effect that supports Hong Kong's Climate Action Plan 2050 and smart city aspirations.

Looking ahead, we are striving to foster collaboration with stakeholders from Hong Kong and beyond, accelerating sustainability progress while generating enduring common value. At HKT, we believe that true success lies in building a sustainable future where our actions not only strengthen our business resilience but also enable our community's use of technology going forward.



## 1.2 About HKT

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HKT Trust and HKT Limited (“HKT” or the “Company”) is a technology, media, and telecommunication leader with more than 150 years of history in Hong Kong. As the city’s true 5G provider, HKT connects businesses and people locally and globally. Our end-to-end enterprise solutions make us a market-leading digital transformation partner of choice for businesses, whereas our comprehensive connectivity and smart living offerings enrich people’s lives and cater for their diverse needs for work, entertainment, education, well-being, and even a sustainable low-carbon lifestyle. Together with our digital ventures which support digital economy development and help connect Hong Kong to the world as an international financial centre, HKT endeavours to contribute to smart city development and help our community tech forward.

# 1.3 About this Report

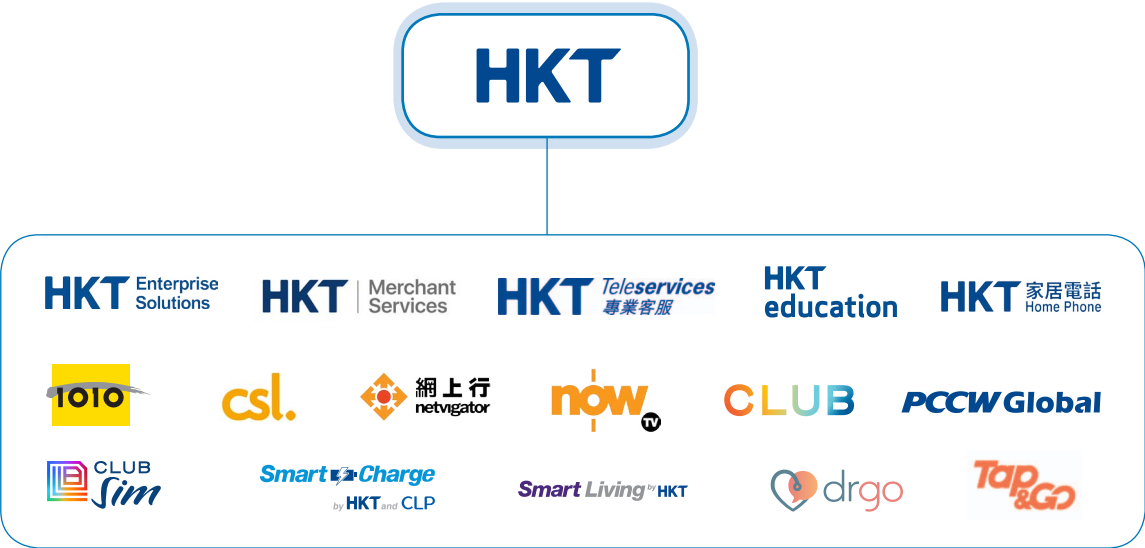
This is the ESG report for the Company and its subsidiaries (collectively the “Group” or “We”).

## 1.3.1 Reporting Period

This report covers the Group’s ESG accomplishments and challenges from 1 January to 31 December 2024, as well as our ongoing initiatives to enhance our ESG performance.

## 1.3.2 Reporting Scope

This report encompasses the Group’s core businesses based in Hong Kong, namely technology and telecommunications, including the operations of our offices, retail shops, data centres, exchange sites, telecommunications sites and transmissions, unless otherwise specified. Where relevant, it also references the activities of subsidiaries and outsourced operations. The qualitative and quantitative information about the Group’s approach, initiatives, and priorities in managing material ESG aspects are disclosed in the report.





### 1.3.3 Reporting Standards

This report has been prepared in accordance with provisions of the Environmental, Social and Governance Reporting Guide (“ESG Reporting Guide”) in Appendix C2 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (“HKEX”), with reference to Global Reporting Initiative (“GRI”) Standards 2021.

### 1.3.4 Reporting Principles

The report has referenced the Reporting Principles as recommended by GRI and as set out in the HKEX ESG Reporting Guide to define the report content and to ensure the quality of information presented, including:

Materiality	Quantitative
Both financial and impact materiality are assessed based on the results obtained from stakeholder engagement. Our top management has reviewed and agreed upon the threshold for ESG topics to become material to ensure that they are comprehensive and important to our stakeholders.	A cloud-based data management platform has been deployed to collect our ESG metrics and keep track of our performance.  Where applicable, we have compared year-on-year data and discussed their implications. Relevant standards, methodologies, assumptions, and conversion factors are disclosed when reporting the Group’s emissions and energy consumption.
Balance	Consistency
The content and data provided in the report are unbiased. We discussed both our achievements and room for improvement across all ESG aspects where possible.	This report adopts consistent methodologies to allow a fair comparison of our performance over time. We have disclosed the changes to the methods or key performance indicators (“KPIs”) used where applicable.

In preparing the ESG-related information for this report, we have adopted some estimations and assumptions that consider process complexity, data availability, and quality. Methodologies used are developed with reference to established standards and are deemed appropriate and suitable to evaluate our ESG performance.

### 1.3.5 Assurance

The board of directors (the “Board”) of the Group is accountable for our ESG strategies, reporting and oversight of ESG risks. This report has been reviewed and approved by the Board of HKT.

The report has been independently reviewed and verified by the Hong Kong Quality Assurance Agency (“HKQAA”). Please refer to the Verification Statement issued by HKQAA on page 59 and 60 for the verification scope and conclusion.

### 1.3.6 Contact Us

This report is available in English and Traditional Chinese and can be accessed on both HKEX’s and HKT’s websites. In the event of any discrepancies between the two language versions, the English version shall prevail.

We value stakeholders’ views and suggestions. Please share your feedback on our ESG management and reporting via the following channels:

Mail: 39/F, PCCW Tower, Taikoo Place, 979 King’s Road, Quarry Bay, Hong Kong  
Phone: +852 2888 2888  
Email: [esg@hkt.com](mailto:esg@hkt.com)

## 1.4 2024 Performance Highlights at a Glance

### Good Governance

#### Driving Business Success with Strong Business Ethics

- Four compliance refresher trainings were launched to facilitate staff observance on topics about Enterprise Risk Management (“ERM”), anti-bribery and corruption (“ABC”), data privacy and international trade compliance
- Conducted scenario-based cybersecurity drill simulation to facilitate the Corporate Incident Response Team’s familiarisation with cybersecurity incident response handling processes and communicate important considerations during different phases of incident response

#### Managing Supply Chain in a Sustainable Manner

- **77%** of suppliers are based in Hong Kong
- **99** supplier visits conducted
- Have achieved **ISO 9001:2015** certification for our Quality Management System



### Shared Societal Value

#### Driving Digital Innovation and Value

- Deployed a comprehensive 5G network that covers **99%** of Hong Kong



#### Delivering Customer-centric Services

- Net promoter score of **98** in technical support<sup>1</sup>
- Blocked **3 billion+** cyber threats and **800 million+** suspicious local and overseas calls

#### Deepening Community Engagement

- **2,500** total volunteering hours



#### Fostering a Thriving Workforce

- **1:1.4** female to male staff ratio
- About **33%** of management positions taken by female
- **184,889** total training hours

### Enhancing Environmental Stewardship

#### Committing to Environmental Management

- **↓2.9%** GHG emissions (YoY change)
- **↓3.4%** electricity consumption (YoY change)
- **↓0.9%** general waste (YoY change)
- **70%+** of our loan facilities come from sustainable financing

#### Offering Green Solutions

- Smart energy solutions adopted at **30+** exchange buildings
- 5G Weather Station installed at **12** schools
- Nearly **10,000** electric vehicle (“EV”) parking bays established by Smart Charge

<sup>1</sup> Net Promoter Score in technical support is evaluated based on the survey sent to customers who received services delivered by our mobile consultants at designated csl/1010 shops such as handset data transfer and smartphone workshop.



### 1.4.1 Awards and Accolades

# HKT

- Obtained an “AA” rating in the MSCI ESG Ratings since 2021, and is a constituent of the World ESG Screened Index, World ESG Enhanced Focus CTB Index and ACWI ESG Universal Index as of the end of December 2024<sup>2</sup>
- Selected for the S&P Global Sustainability Yearbook (China Edition) 2024
- Won ESG Report of the Year — Large Market Capitalisation, Best in ESG — Large Market Capitalisation, Best in Reporting — Large Market Capitalisation and merit in Theme Awards under The BDO ESG Awards 2024
- Awarded the 10 Years Plus Caring Company Logo by the Hong Kong Council of Social Service
- Obtained a certificate of appreciation from *Hong Kong Economic Journal* under the ESG Achievement Programme 2024
- Received the Excellence in ESG Award — Listed Company (Telecom & technology) from Ming Pao ESG Award 2024
- Has been recognised as one of the Friends of EcoPark 2024 by the Environmental Protection Department
- Received the Grand Award in Energy Management (Corporate/Government Bodies) in CLP Smart Energy Award 2024



<sup>2</sup> The use by HKT of any MSCI ESG Research LLC or its affiliates (“MSCI”) data, and the use of MSCI logos, trademarks, service marks or index names herein, do not constitute a sponsorship, endorsement, recommendation, or promotion of HKT by MSCI. MSCI services and data are the property of MSCI or its information providers, and are provided ‘as-is’ and without warranty. MSCI names and logos are trademarks or service marks of MSCI.

## 1.5 Our Sustainability Governance and Oversight

The long-term viability of the Group is underpinned by a robust corporate governance framework that integrates sustainability management into all aspects of business operations and decision-making processes.

As the highest governing body, the Board oversees the formulation of ESG strategies, supervises ESG progress, regularly discusses the management of sustainability issues, including climate-related topics, and reviews the annual ESG report. This governance structure ensures the effective management of operational direction and sustainability policies. In line with the Group's commitment to sustainability and its impact on business operations, sustainability issues (including climate-related topics) are discussed at board level.

Responsibilities for managing, executing and reviewing ESG-related agendas are delegated to respective Board Committees, Sub-committees and respective ESG drivers.

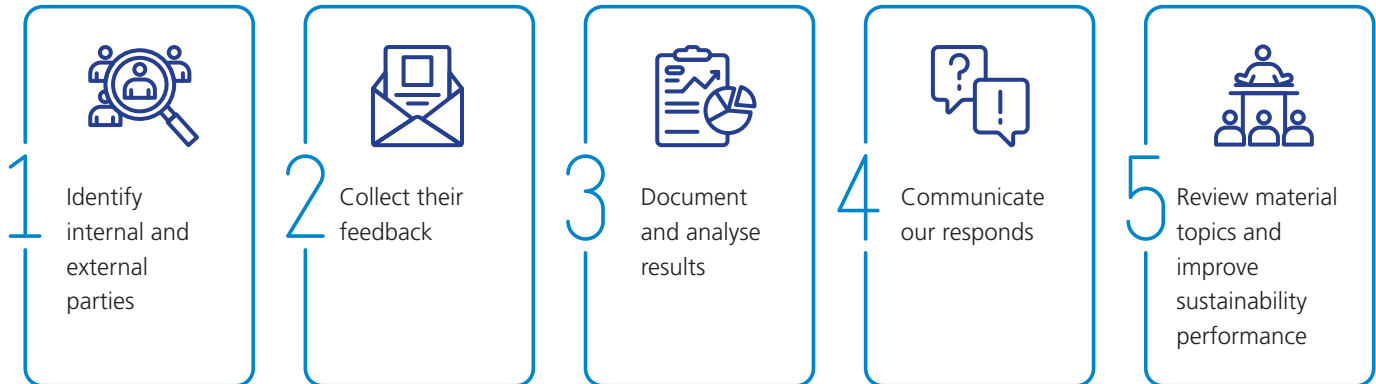
Highest Governing Body	The Board	
	<ul style="list-style-type: none"> <li>Ensures that the Group's risk management and internal control frameworks are robust and efficient, guaranteeing compliance with relevant laws and regulations</li> <li>Oversees the sustainability strategy and acts as the ultimate authority for decision-making</li> <li>Reviews and approves the ESG Report</li> </ul>	
Board Committees	Executive Committee	Audit Committee
	<ul style="list-style-type: none"> <li>Acts as a general management committee under the delegation of authority bestowed by the Board</li> </ul>	<ul style="list-style-type: none"> <li>Supports the Board in ensuring the impartiality and reliability of financial reporting, with directors presenting the results to shareholders with the necessary care, diligence, and competence as mandated by law</li> <li>Assists the Board in ensuring robust risk management and internal control systems that cover ESG risks and issues (including climate-related ones) and in maintaining high standards and practices of corporate governance</li> <li>Reviews and recommends the ESG report for the Board's approval</li> </ul>



Sub-committees	Risk Management, Controls and Compliance Committee ("RMCCC")		Sustainability Committee	
	<ul style="list-style-type: none"><li>Evaluates the processes for compiling the Group's annual and interim financial reports periodically</li><li>Examines Group policies to guarantee adherence to the diverse regulations and responsibilities of a company listed on the Hong Kong Stock Exchange</li><li>Supports the Board and the Audit Committee in the continuous assessment of the efficacy of the Group's risk management and internal control systems that cover ESG risks and issues (including climate-related ones)</li><li>Reviews and proposes the ESG report for the Board's endorsement</li></ul>		<ul style="list-style-type: none"><li>Examines the Group's sustainability strategy, principles, and policies to ensure operations align with the Group's commitment to positively impact society and the environment (including climate-related issues)</li><li>Supervises and offers guidance on ESG practices and procedures</li><li>Tracks the progress of ESG initiatives against their associated objectives and targets</li><li>Reviews the ESG Report</li></ul>	
ESG Drivers	ESG Team	Departmental ESG Representatives	Environmental Advisory Group	
	<ul style="list-style-type: none"><li>Interacts with stakeholders to promote ESG within the organisation and with external stakeholders</li><li>Develops and executes ESG initiatives</li><li>Prepares the ESG Report</li></ul>	<ul style="list-style-type: none"><li>Forges partnerships with the ESG Team, business units and function units</li><li>Encourages the adoption of ESG practices</li><li>Enhances colleagues' understanding of ESG issues</li><li>Supports the preparation of ESG reports and participates in ESG-related surveys</li></ul>	<ul style="list-style-type: none"><li>Offers counsel on environmental policies and objectives and submits recommendations to the Sustainability Committee</li><li>Supports the coordination of environmental initiatives across various business units and function units</li></ul>	
Implementation or Execution	Business Units and Function Units			
	<ul style="list-style-type: none"><li>Takes ESG initiatives into action and ensures adherence to them in routine operations</li></ul>			

## 1.6 Engaging with Our Stakeholders

The Group actively engages with stakeholders to identify material ESG topics and to prioritise ESG initiatives as part of our commitment to continuously address their concerns and expectations. We connect with various stakeholder groups via multiple channels, including online surveys, meetings, campaigns and seminars. To ensure clear and effective communication, we use plain and concise language to deliver our messages and seek their feedback.



### Communication Channels

#### Management and employees

- Face-to-face meetings
- Forums
- Employee satisfaction survey
- Intranet
- Social media
- Online surveys

#### Shareholders, investors, and analysts

- Meetings
- Annual general meetings
- Annual, interim and ESG reports
- Circulars and press releases
- Analyst briefings
- Website

#### Community and media

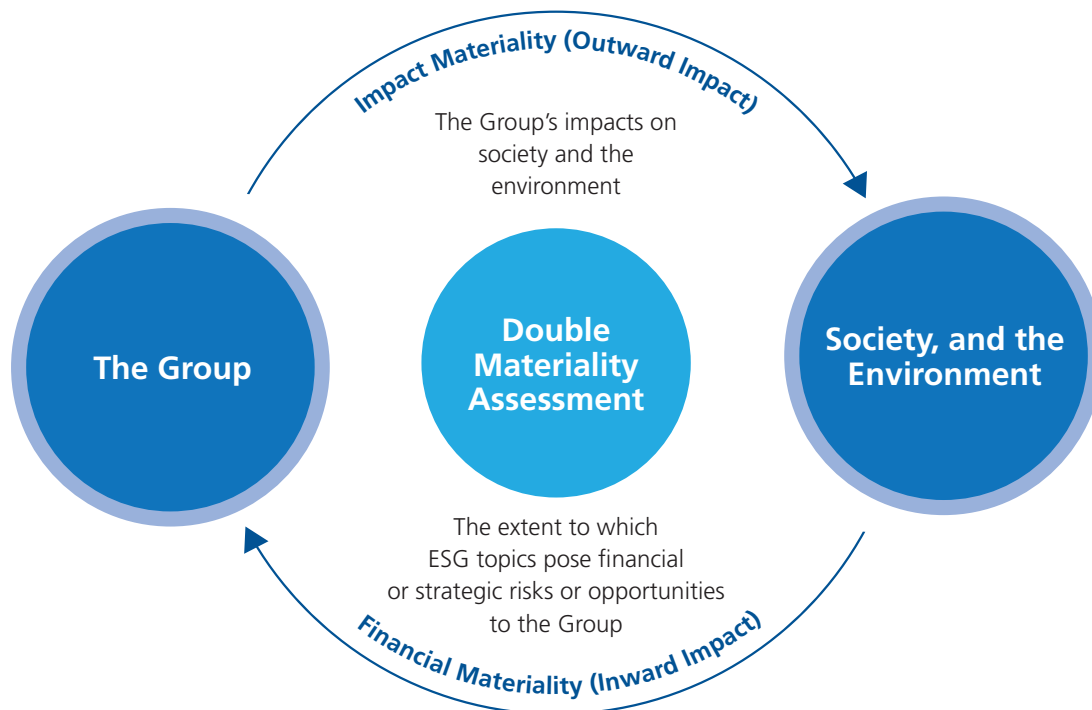
- Campaigns
- Seminars
- Website and social media
- Press and releases and conferences
- Media enquiries responses



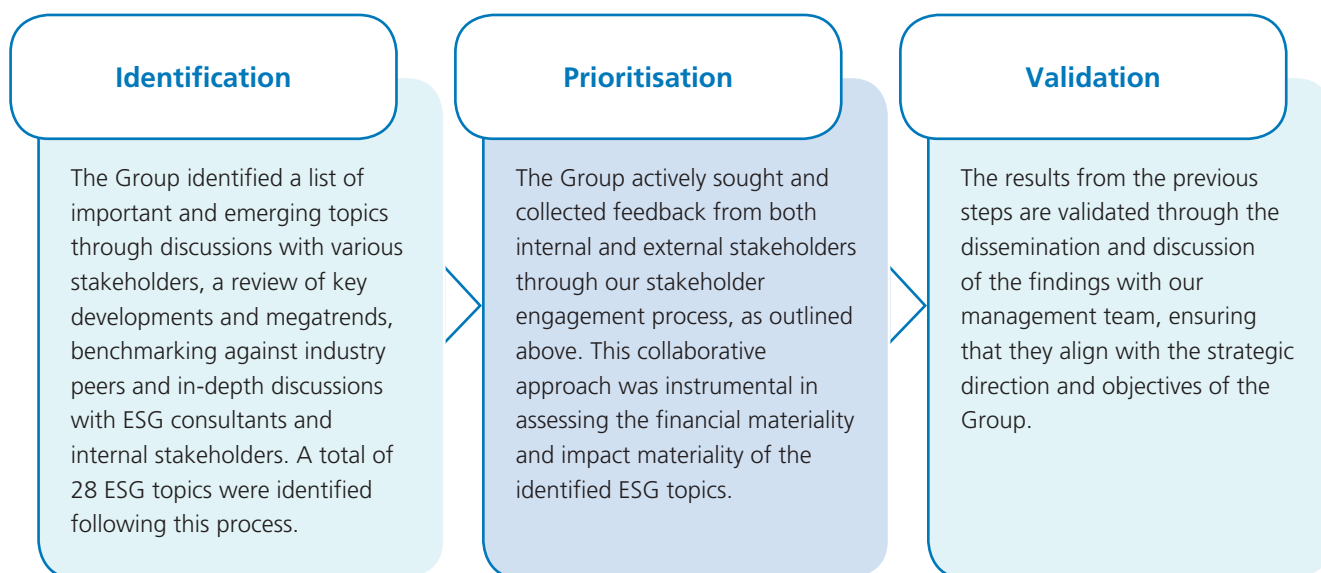
### 1.6.1 Double Materiality Assessment

The Group adopts a double materiality approach that considers both the impact of social and environmental issues on our financial performance, and the impacts of our business operations on the society and environment.

Similar to our materiality assessment in 2023, the Group invited internal and external stakeholders to share their views on our materiality matrix. In this exercise, internal stakeholders include our employees, while external stakeholders include investors, suppliers and contractors, corporate clients, business partners, as well as community partners. Apart from feedback collected from stakeholders, the Group's management team also considered key developments and megatrends and our peers' developments to review and evaluate the topics which are material to the Group.



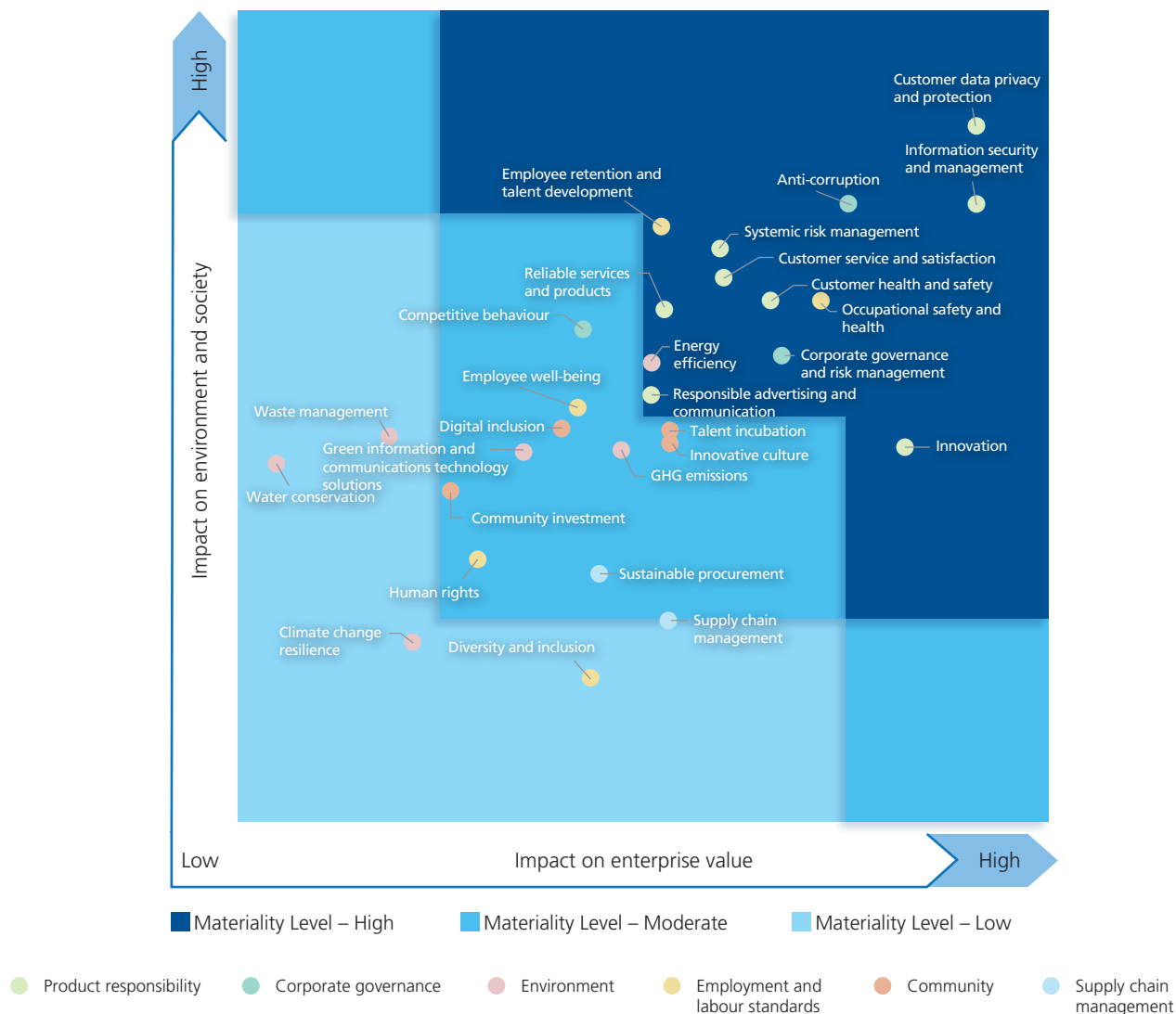
Our double materiality assessment, a comprehensive three-step process covering identification, prioritisation and validation, is crucial for developing and informing our sustainability strategy.



As we have a broad range of stakeholders, the ESG topics may have different relevance to each stakeholder group. We have mapped the relevance of each topic against our different stakeholder groups.

### HKT's Materiality Matrix 2024

The materiality assessment results are outlined in our Materiality Matrix 2024. The outcomes are evaluated based on both impact and financial materiality. We compare the degree of our impact on the environment and society related to these issues (along the Y-axis), and the effect of these issues on the Group's enterprise value (along the X-axis).





The top three key material topics in 2024 are “customer data privacy and protection”, “information security and management” and “anti-corruption”. We have developed robust control mechanism and implemented relevant policies to manage these topics within our operations. For more details of our approach to the topics, please refer to the “Delivering Customer-Centric Services” and “Driving Business Success with Strong Business Ethics” section.

The table below summarises our material topics, their materiality level and impact boundaries.

Materiality level	Aspect	ESG topics	Boundaries and Impacts						
			Employees	Business Partners	Community Partners	Corporate Clients	Retail Customers	Shareholders & Investors	Suppliers & Contractors
Most material	Product responsibility	Customer data privacy and protection	✓	✓		✓	✓	✓	✓
	Product responsibility	Information security and management	✓	✓		✓	✓	✓	✓
	Corporate Governance	Anti-corruption	✓	✓	✓	✓	✓	✓	✓
	Product responsibility	Innovation	✓	✓	✓	✓	✓	✓	✓
	Employment and labour standards	Occupational safety and health	✓		✓	✓	✓	✓	✓
	Product responsibility	Customer health and safety	✓			✓	✓		✓
	Corporate Governance	Corporate governance and risk management	✓	✓		✓	✓	✓	✓
	Product responsibility	Systemic risk management	✓	✓	✓	✓	✓	✓	✓
	Product responsibility	Customer service and satisfaction	✓	✓		✓	✓	✓	✓
	Employment and labour standards	Employee retention and talent development	✓					✓	
	Product responsibility	Reliable services and products	✓	✓		✓	✓	✓	✓
	Environment	Energy efficiency	✓	✓	✓	✓	✓	✓	✓
	Product responsibility	Responsible advertising and communication		✓			✓		
Moderately material	Community	Talent incubation	✓		✓			✓	
	Community	Innovative culture	✓		✓			✓	
	Corporate Governance	Competitive behaviour	✓	✓		✓	✓	✓	✓
	Environment	GHG emissions	✓	✓	✓	✓	✓	✓	✓
	Supply chain management	Supply chain management	✓			✓	✓		✓
	Employment and labour standards	Employee well-being	✓					✓	
	Community	Digital inclusion	✓		✓			✓	
	Supply chain management	Sustainable procurement	✓			✓	✓		✓
	Environment	Green information and communications technology solutions	✓	✓		✓	✓	✓	
	Employment and labour standards	Human rights	✓					✓	✓
	Community	Community investment	✓		✓			✓	
Less material	Environment	Waste management	✓	✓	✓	✓	✓	✓	✓
	Environment	Climate change resilience	✓	✓	✓	✓	✓	✓	✓
	Employment and labour standards	Diversity and inclusion	✓			✓		✓	
	Environment	Water conservation	✓	✓	✓				✓

● Product responsibility  
 ● Corporate governance  
 ● Environment  
 ● Employment and labour standards  
 ● Community  
 ● Supply chain management

✓: The stakeholder group falls within the impact boundary of the topic.

## 1.6.2 Listening and Responding to Our Stakeholders

Based on insightful stakeholder feedback we have gathered as part of the materiality assessment process, the summary below outlines some critical stakeholder concerns and our response.



### Environmental:

**Q1: How does the Group manage its carbon emissions to tackle the global challenge of climate change?**

**Our response:**

The Group is committed to reducing our Scope 1 and 2 emissions. In 2024, we achieved a reduction of 40.0%, thereby surpassing our 2025 goal of reducing our absolute Scope 1 and 2 emissions by 34.0% compared to the 2018 base year. We initiated the evaluation of our Scope 3 emissions this year with the aim of disclosing material categories of Scope 3 emissions in the coming year when data becomes available. We are working to provide our stakeholders with as complete and transparent an overview of our performance as possible.

For more details, please refer to the “Enhancing Environmental Stewardship” chapter.



### Social:

**Q2: How does the Group foster the advancement of AI to generate collective societal benefits?**

**Our response:**

The Group is dedicated to broadening the adoption of advanced technologies such as AI and generative artificial intelligence (“GenAI”) within our operations and service offerings to leverage our strengths and foster the transformation to a smart city. Internally, we have initiated comprehensive AI training programs for our staff, ensuring that our workforce is equipped with the necessary skills and insights to transform. We are also enhancing the resource efficiency of our operations and reducing our carbon footprint by leveraging AI’s capabilities. Externally, CSL Mobile staffed 49 AI Stores as pivotal platforms with trained AI specialists to offer guidance on 5G and AI applications, enhancing the AI readiness of over 12,000 customers through over 110 5G AI Academy online and offline workshops. We will continue to spearhead the development of AI and emerging technologies and facilitate smart city transformation.

For more details, please refer to the “Shared Societal Value” chapter.



### Governance:

**Q3: How does the Group maintain data privacy and security with the increasing use of AI applications?**

**Our response:**

The Group has implemented various usage guidelines to address regulatory compliance and manage technology risks related to AI applications. Additionally, we have established the GenAI Taskforce, with the respective control parties providing advisory support and oversight on new strategic imperatives to address any risks and compliance challenges arising from AI adoption. We will continue to monitor the effectiveness of the risk assessment approach on AI adoption across the Group, including the implementation of model validation, to support the adoption of AI tools within our operations.

For more details, please refer to the “Shared Societal Value” chapter.



## 2 Good Governance

The Group upholds responsible and sustainable business practices across our business operations and value chain. We also strive to exceed customer expectations by delivering services and products with enhanced customer experience.

### Driving Business Success with Strong Business Ethics

- Conducted four compliance trainings on topics on ERM, anti-bribery and corruption, personal data protection and international trade compliance
- Enhanced business practices to uphold business integrity

### Managing Supply Chain in a Sustainable Manner

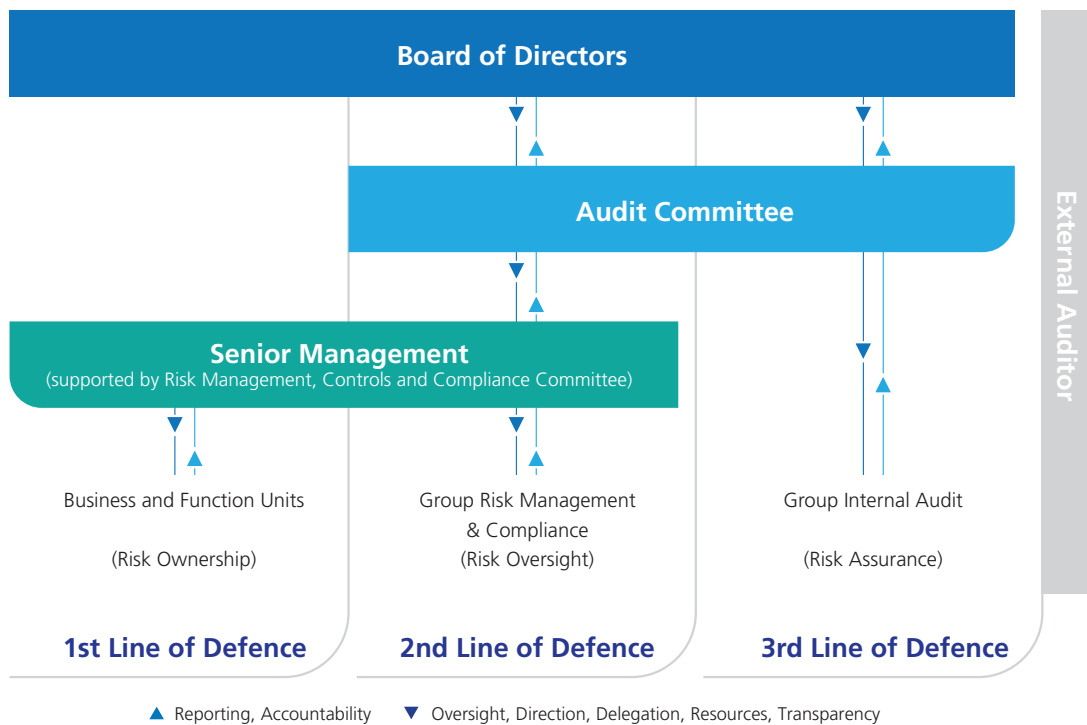
- Advocated sustainable procurement by sourcing from local where possible
- Enhanced continuous supplier management and assessment to monitor sustainability performance

### UN Sustainable Development Goals (“UNSDGs”):



## 2.1 Enterprise Risk Management

Risk management is an essential component of corporate governance and a foundational safeguard against the external environment's dynamic challenges. The Group adopts an Enterprise Risk Management ("ERM")<sup>3</sup> Framework with reference to ISO 31000:2018 Risk Management — Guidelines, guided by the "Three Lines of Defence" model that integrates top-down and bottom-up risk assessment processes. ESG risks and issues, including climate related ones, are fully integrated into the ERM.



Under this Framework, respective business or function units, as risk owners and the first line of defence, are responsible for the regular identification, evaluation, monitoring and mitigation of their risks, in addition to the reporting of such risk assessment processes to Group Risk Management & Compliance ("GRM&C"). GRM&C, as the second line of defence, performs a supervisory role in ERM in providing advisory support to enable risk and compliance oversight of activities undertaken by the first line of defence, while ascertaining the relevant embedded controls are operating effectively. GRM&C assesses and reviews significant aspects of the Group's risk exposure. Identified material risks and corresponding mitigation measures are regularly reported to the Audit Committee to ensure timely management of all significant risks of the Group. The Group Internal Audit Function acts as the third line of defence, providing assurance on risks and reporting directly to the Audit Committee.

The Group considers ESG risks and opportunities (including climate-related ones) across business operations, with oversight from the Board and shared responsibility across all levels. ESG risks have been fully integrated into the Group ERM framework, with relevant training provided to ensure employees are fully aware of ESG risks and issues in business operations. We actively monitor ESG risks that are deemed material to our business model and value chain. For more information on our climate-related risks and opportunities management, please refer to the "Managing Climate-related Risks and Opportunities" section.

<sup>3</sup> For further information on the ERM framework and methodology, please refer to the Combined Corporate Governance Report of HKT's Annual Report 2024.






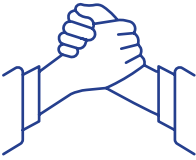


# 2.2 Driving Business Success with Strong Business Ethics

## 2.2.1 Sustainability Policies: Our Guiding Principles

The Group is dedicated to upholding high standards of governance and integrity in every facet of our operations. All employees must adhere strictly to the Group’s policies and procedures, especially when representing the Group, whether engaging with customers, external parties, regulatory bodies, authorities, or the public.

In 2024, the Group has revised and updated Group policies and procedures to strengthen the Group’s corporate governance framework. The Board, via RMCCC, has endorsed the following policies to increase awareness of proper governance and compliance responsibilities across different business and function units.

Aspects	Policies	FY24 Updates
 <p><b>Sustainability Management Approach</b></p>	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Corporate Social Responsibility Policy</li> </ul>	<ul style="list-style-type: none"> <li>• No updates in 2024</li> </ul>
 <p><b>Governance</b></p>	<ul style="list-style-type: none"> <li>• Anti-Bribery and Corruption (“ABC”) Policy</li> <li>• Statement of ABC Policy (For External)#</li> <li>• Anti-Money Laundering and Counter-Terrorist Financing Policy</li> <li>• Board Diversity Policy</li> <li>• Corporate Incident Response Plan</li> <li>• Information Technology Security Policy#</li> <li>• Whistleblower Policy</li> </ul>	<ul style="list-style-type: none"> <li>• The Information Technology Security Policy sets forth rules and practices for the Group’s employees, contractors and third-party users to follow, including the specification of security requirements that are mandatory for the Group’s computing environments. This policy is approved by the RMCCC and outlines the IT security control requirements with four general categories — Organisation, Physical, Technology and People. The policy has been updated this year to refine and supplement the IT security control standards by aligning with industrial best practices (e.g. ISO 27001:2022, Payment Card Industry Data Security Standard).</li> </ul>

Aspects	Policies	FY24 Updates
 <p><b>Customer and Marketplace</b></p>	<ul style="list-style-type: none"> <li>• Fraud and Security Incident Management Policy</li> <li>• Intellectual Property Rights Policy</li> <li>• Personal Data Privacy Policy<sup>#</sup></li> <li>• Privacy Statement</li> <li>• Sensitive Information Monitoring Policy</li> </ul>	<ul style="list-style-type: none"> <li>• Personal Data Privacy Policy seeks to ensure personal data belonging to, or held for and/or on behalf of the Group is consistently handled, processed and retained. The policy has been updated this year to redefine the data lifecycle and key terminologies.</li> </ul>
 <p><b>Employment</b></p>	<ul style="list-style-type: none"> <li>• Human Resources Policy Manual</li> <li>• Statement of Safety and Health Policy</li> </ul>	<ul style="list-style-type: none"> <li>• No updates in 2024</li> </ul>
 <p><b>Environment</b></p>	<ul style="list-style-type: none"> <li>• Energy and Water Management Policy and Guidelines</li> </ul>	<ul style="list-style-type: none"> <li>• No updates in 2024</li> </ul>
 <p><b>Supply Chain Management</b></p>	<ul style="list-style-type: none"> <li>• Group Purchasing Policy and Principles ("GPPPs")</li> <li>• Supplier Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>• No updates in 2024</li> </ul>

<sup>#</sup> The policy has been enhanced during the reporting period.

### 2.2.2 Ensuring Ethical Business Practices

The Group upholds business integrity in our engagements with our global and local stakeholders through transparent practices governed by a robust corporate governance framework. We strictly comply with the Group's ethical standards and applicable laws and regulations across all the jurisdictions in which we operate. Guided by the comprehensive sets of the Group policies and procedures, we require all Group members, including directors, officers, and employees to adhere to a set of behaviour standards that goes beyond the local statutory requirements. Whenever applicable, we also urge any other individuals associated with the Group, including suppliers, contractors, sub-contractors, trainees, seconded staff, casual workers, volunteers, interns, and agents, to adhere to the same level of ethical standards.

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#### **Anti-bribery and Corruption ("ABC")**

The Board maintains a zero-tolerance stance towards any form of bribery and corruption at all levels concerning any aspect of the Group's activities. Our ABC Policy outlines the principles that all directors, officers, employees, and external parties representing the Group must follow to conduct business with integrity and honesty to minimise the risk of corruption.

In conjunction with the ABC Policy, we have established an ABC Procedure Manual ("Procedure Manual") to provide comprehensive guidance on mitigating potential bribery and corruption risks and upholding the highest ethical standards in our business practices worldwide. Employees are encouraged to refer to this Procedure Manual in case of any uncertainty regarding whether a particular behaviour or unusual business transaction may lead to bribery or corrupt practices. This Procedure Manual is tailored to address the risks we encounter, including but not limited to gifts and hospitality, charitable donations, political contributions, facilitation payments, and kickbacks. As a global technology, media and telecommunications conglomerate, we strictly comply with the principles outlined in international anti-corruption laws, with reference to the United Kingdom Bribery Act 2010, recognised as one of the highest standards in ABC and serves as the foundation for our ABC Policy and Procedure Manual.

We have also implemented a comprehensive ABC online refresher training course to enhance all employees' awareness on bribery and corruption matters.

In 2024, the Group has not faced any legal cases related to non-compliance with bribery laws, namely the Prevention of Bribery Ordinance (Cap. 201) and other applicable laws and regulations related to corruption, nor any legal cases concerned with corrupt practices brought against the Group or its employees.

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#### **Anti-competitiveness**

The Group is strongly committed to adhering to all relevant competition laws, including the Hong Kong Competition Ordinance. Our Code of Conduct explicitly outlines our prohibition of any form of anti-competitive behaviour. Our Regulatory Compliance Committee oversees and monitors our interactions with other entities to prevent anti-competitive practices.

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**Anti-money Laundering  
("AML") and  
Counter-terrorist Financing  
("CTF")**

The Group has implemented robust AML and CTF policies. These policies mandate adherence to all relevant laws in Hong Kong by all subsidiaries, employees, and affiliates in their daily operations. Regular risk assessments and monitoring are conducted at the business unit level to ensure compliance with laws and regulations.

Recently, the Group bolstered its AML practices by introducing mandatory Know-Your-Transaction protocols for blockchain transactions, underscoring our commitment to transaction integrity and compliance.

Clear guidelines for addressing conflicts of interest are also in place, with necessary forms accessible on our Intranet.

In 2024, the Group has not had any instances of money laundering breaches.

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**Whistleblowing**

The Group is dedicated to upholding exemplary standards of corporate governance, which are essential for promoting high levels of ethics, transparency, responsibility, and integrity throughout its operations. This commitment ensures that all activities comply with relevant laws and regulations while safeguarding the interests and safety of shareholders, investors, customers, directors, and employees.

To maintain accountability, internal and external stakeholders are encouraged to report any suspected misconduct confidentially to the Audit Committee through Group Internal Audit. Reported incidents are recorded, evaluated, and investigated following the Group's Whistleblower Policy. An independent and suitably senior member of the staff, such as the Head of Group Internal Audit, is appointed as the case manager on behalf of the Chairman of the Audit Committee. All whistleblowing cases are handled with the utmost confidentiality, in line with the procedures outlined in the Group's Whistleblower Policy, which is periodically reviewed and updated.

Upon concluding an investigation, investigation reports are presented to the RMCCC and, when necessary, to the Audit Committee for review, including outcomes, impacts, and recommendations for enhancements.

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### **Data Privacy and Information Security**

We have established robust internal policies and procedures that govern personal data collection, use, and management. These policies outline the roles and responsibilities of handling personal data and include appropriate security measures to ensure confidentiality, integrity, and accountability.

The Group Data Protection Officer oversees compliance with all regulations related to personal data privacy and protection. We are also committed to maintaining the highest cybersecurity standards to protect our customers' personal data and our business data. Our information security policies are based on industry best practices, including the ISO/IEC 27001 standard, and are regularly reviewed to ensure their relevance and effectiveness.

At the Group level, the Group Information and Cybersecurity Council ("GICSC") oversees all cybersecurity initiatives, investments, and maintenance related to the protection of our essential infrastructure, such as networks, servers, and endpoints. The GICSC reports directly to senior management on any critical cybersecurity issues. We have also established dedicated teams within the Group, namely the Group Information and Cybersecurity Office, responsible for assessing our overall cybersecurity risk profile and monitoring suspicious activities to prevent cyberattacks. This team continuously reviews current cybersecurity developments to enhance our policies and invest in technologies that enable us to respond promptly.

On the other hand, at the departmental level, several of our business and function units have accredited ISO/IEC 27001 certification, highlighting our commitment to effective data security management and data protection. To comply with the latest legal and regulatory requirements, we have developed strict internal policies that integrate these standards into our daily operations. In 2024, the Group also organised a tabletop cybersecurity training session on cybersecurity for leaders of our business and function units, which aims to raise our senior management's awareness of the latest trends in cybersecurity.

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### **Intellectual Property Rights**

We are dedicated to safeguarding the intellectual property rights of our Group, as well as those of our customers, suppliers, and business partners. To ensure compliance with relevant laws and regulations, we have established an Intellectual Property Rights Policy. This policy applies to our marketing materials, while we expect our suppliers and business partners to adhere strictly to the policies and standards related to intellectual property rights outlined in our business contracts.

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### **Instilling Compliance Culture across the Group**

The Board has implemented our Code of Conduct as a comprehensive framework guiding the behaviour and corporate responsibilities of directors, officers, and employees to maintain high standards, going beyond legal requirements. Breaches of policies may lead to warnings or dismissal, depending on the severity. To reinforce these standards and promote a culture of compliance, continuous training is provided to our employees to stay current on applicable laws and regulations.

Online risk and compliance induction training have been introduced for new employees, covering areas such as ERM, ABC, AML and CTF, whistleblowing, data privacy, technology risk and cybersecurity, and international trade compliance as part of the orientation program.

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# 2.3 Managing Supply Chain in a Sustainable Manner

## 2.3.1 Upholding Ethical Supplier Standards

The Group has established a Supplier Code of Conduct to set clear expectations for our suppliers, promoting ethical business practices in line with global compliance standards. We encourage our suppliers to implement the Supplier Code of Conduct across all levels of their supply chains. The Supplier Code of Conduct addresses various ESG issues and is publicly available on our website, where it is periodically reviewed and updated to ensure compliance with current laws and regulations.

To ensure consistent ethical standards and compliance across the Group, we provide training on procurement, supply chain management, and social and environmental standards to selected employees.

The Group has developed a set of GPPPs to guide the supplier selection and management process. The GPPPs not only establish control points for each stage of the supply chain process but also set out criteria for managing procurement practices effectively, ensuring alignment with our corporate and social responsibilities. ESG elements, particularly green procurement, have also been integrated into these principles, reinforcing our commitment to environmental stewardship.

## 2.3.2 Practising Sustainable Procurement

As a founding member of the Sustainable Procurement Charter (“Charter”) established by the Green Council, we actively monitor our suppliers’ compliance with environmental and social standards, as well as their ESG risk profiles, while encouraging continuous improvement. The Charter serves as a platform for stakeholders interested in collaborating towards achieving the UNSDG on Responsible Consumption and Production. Our supplier ESG initiatives are facilitated by the Group Purchasing and Supply department with the assistance of GRM&C. Training has been provided to the Group Purchasing and Supply department members to ensure their alignment with the company’s overall ESG objectives.

We actively seek partnerships with key suppliers to source sustainable materials, utilise recycled packaging, and eliminate single-use packaging during our delivery processes. We are committed to avoiding the procurement or use of conflict minerals, including tin, tantalum, tungsten, and gold sourced from the Democratic Republic of the Congo or neighbouring countries associated with illegal activities. We ensure compliance with all relevant conflict mineral regulations in the jurisdictions where we operate. Additionally, we strive to minimise exposure to conflict and high-risk areas and have implemented policies to prevent modern slavery within our supply chain.

In our pursuit of excellence, we have achieved ISO 9001:2015 certification for our Quality Management System, which enables us to maintain rigorous oversight of our supply chain management and monitor supplier performance effectively. We have adopted a long-term approach to managing and nurturing supplier relationships by classifying them into critical tier-1 and non-tier-1 suppliers. We maintain regular communication channels with our suppliers to assess their current practices and new initiatives related to ESG issues. Where relevant, we also provide support and training on social and environmental standards to our suppliers. This categorisation allows us to implement tailored approaches and requirements for different tiers of suppliers.

Supplier types	Number
Critical tier-1 suppliers	37
Non-tier-1 suppliers	5,904

Regarding supplier screening and assessment, out of 37 Tier-1 suppliers, all are classified as critical or significant. In 2024, no suppliers were identified with substantial actual or potential negative impacts.

### 2.3.3 Evaluating Suppliers

#### Supplier Selection

As part of our supplier ESG programme, we require suppliers to complete a Vendor Registration Form, which assesses their quality assurance, ESG performance and corporate governance. Our standard procurement contracts include ESG-related clauses that mandate compliance with environmental and occupational safety and health (“OSH”) regulations, aligning with the Group’s standards and practices.

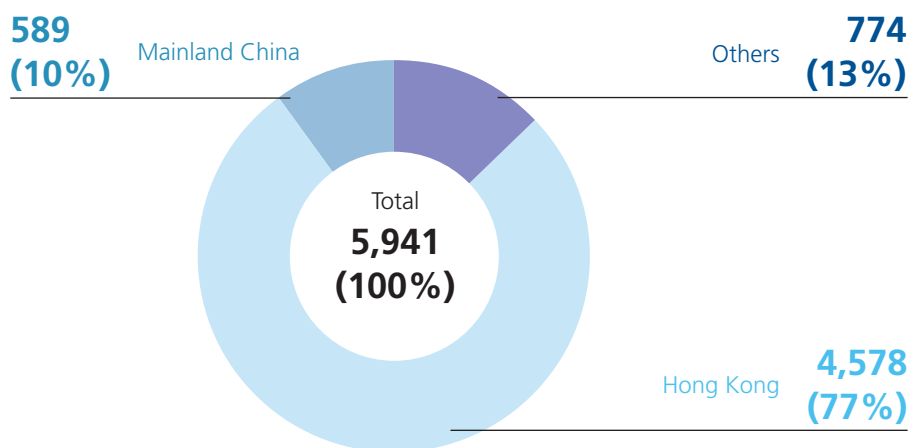
During our screening process, we evaluate potential suppliers based on their ESG performance and business practices, considering various factors alongside ESG considerations.

Suppliers that demonstrate a solid commitment to sustainable business practices are given priority as we seek to collaborate with partners who share our values.

In our dedication to fostering a diverse and inclusive supply chain, as well as ensuring fairness and inclusion throughout our procurement processes, we offer equal opportunities to all potential suppliers, regardless of their size, background, or other characteristics. Moreover, we provide adequate training to our procurement team to ensure adherence to these processes.

Furthermore, to reduce our carbon footprint, particularly concerning GHG emissions attributed to transportation and logistics, and to support the local economy, the Group encourages local production and sourcing. In 2024, the Group worked with 5,941 suppliers, of which 77% operate in Hong Kong.

#### Distribution of Suppliers by Geographical Locations



#### Supplier Assessment

Business and function units are required to assess and evaluate supplier performance regularly, focusing on delivery quality and the impact of their operations on the environment, people, and the communities they serve.

As part of our continuous supplier assessment, the Group conducts quarterly reviews to evaluate the ESG practices of our existing suppliers. By considering environmental and social aspects, we aim to create a supply chain that aligns with our commitment to sustainable business practices. In 2024, as part of these assessments, the Group conducted onsite visits for 99 suppliers and desktop assessments of 50 suppliers from both critical tier-1 and non-tier-1, confirming that the majority have ESG practices in place.

We will request relevant corrective actions if a supplier receives an unsatisfactory rating during the review. Should a supplier consistently fail to meet our standards, we may consider terminating our engagement or, in extreme cases, blacklisting them. We are continually exploring opportunities to engage, educate, and incentivise our suppliers on ESG best practices, including but not limited to climate change and human rights topics.

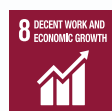


# 3 Shared Societal Value

The Group is dedicated to positively impacting society by building a better future for all. We recognise that a diverse and effective talent pool is crucial for driving digital innovation and creating value for the broader community. To achieve this, we are committed to cultivating an inclusive and respectful working environment where everyone feels valued and empowered. This approach enables us to attract and retain a wide range of talent, leveraging their expertise and strengths to meet the evolving needs of our communities.

Driving Digital Innovation and Value	Delivering Customer-Centric Services
<ul style="list-style-type: none"> <li>• Deployed 5G network across the city and implemented technologies for seamless network connection</li> <li>• Spearheaded AI adoption within the business and for clients across sectors, contributing to the development of a smarter city</li> </ul>	<ul style="list-style-type: none"> <li>• Maintained high network reliability and rapid service restoration</li> <li>• Implemented quality management protocol for products and services, incorporating customer feedback through multiple channels</li> <li>• Proactively addressed scams and equipped customers with tools and knowledge to prevent fraud</li> </ul>
Deepening Community Engagement	Fostering a Thriving Workforce
<ul style="list-style-type: none"> <li>• Fostered the growth and development of future generations</li> <li>• Equipped the elderly with technology skills to bridge the digital divide</li> <li>• Provided in-kind and monetary support for the community</li> </ul>	<ul style="list-style-type: none"> <li>• Organised a series of talent acquisition and talent attraction programmes</li> <li>• Promoted diversity and inclusion as well as OSH measures across business and function units</li> <li>• Prioritised employee well-being through a variety of benefits and initiatives</li> </ul>

## UNSDGs:





## 3.1 Driving Digital Innovation and Value

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The Group leverages its resources and expertise to drive Hong Kong's smart city growth, deploying emerging technologies and continuously elevating the digital experience for both businesses and the community. Our commitment to seamless connectivity and technology enables us to support the digital development of the communities we serve. By providing integrated solutions that utilise cutting-edge technologies such as the IoT, 5G, AI, and GenAI, we enable and facilitate the transformation of enterprises and contribute to the evolution of Hong Kong into a smart city.

### 3.1.1 Expanding Fibre Connectivity and 5G Coverage

The Group continues to deploy a comprehensive 5G network that covers 99% of Hong Kong to help the city fully embrace the new 5G era. As of the end of December 2024, we have established over 18,000 Wi-Fi hotspots across Hong Kong, enabling customers to connect to the network effortlessly while on the go.

By remaining at the forefront of technological advancements, we continue enhancing the quality of our services. We take pride in being the first network provider in Hong Kong to voluntarily comply with the European Telecommunications Standards Institute's F5G Advanced Generation Definition ("F5G-A") standard. To this end, we have implemented a range of cutting-edge technologies, including enhanced fibre broadband, real-time resilient link, and full-fibre connection, bringing ultra-fast, low latency and reliable connectivity to both households and businesses.

Our standalone 5G network enables innovation through partnerships across both private and public sectors, supporting applications such as precise location tracking, uninterrupted services during peak periods, and enhanced connectivity for mega events in Hong Kong. In 2024, we have further expanded the mobile network by adding 82 mobile cell sites, including Central Harbourfront Event Space and Kai Tak Sports Park, to enhance indoor and outdoor coverage. We have also completed a 3.5GHz 5G upgrade at Hong Kong International Airport and expanded network capacity to meet the growing demand within the Mass Transit Railway ("MTR").

We are expanding our capabilities with the newly launched Tiantong Satellite Communication Service, designed to deliver reliable connectivity in remote and outdoor areas where traditional mobile networks are unavailable. By leveraging satellite technology, the service ensures uninterrupted voice and SMS communication, providing critical support in emergency situations. Partnering with Zhong Xing Telecommunication Equipment ("ZTE"), we introduced the ZTE S61 Pro, a 5G-ready device compatible with Tiantong satellite communication technology, facilitating services such as one-touch emergency rescue calls and multi-mode positioning for precise location tracking.

#### Strengthening connectivity and safety through HKSOS Emergency Stations

The Group has partnered with the Hong Kong Police Force to enhance five HKSOS Emergency Stations located in the country park areas. These stations strengthen essential 5G and Super Wi-Fi, enabling Hong Kong citizens to send SOS signals with the HKSOS App installed on their mobile devices and reach the emergency centre for immediate assistance. Additionally, the stations are equipped with USB charging facilities to ensure that mobile devices remain powered during emergencies. By improving infrastructure and connectivity for critical communication, we are actively contributing to safeguarding of public safety in these remote areas.

### 3.1.2 Driving AI Adoption

#### Enabling digital transformation

HKT transforms enterprises with cutting-edge solutions to drive progress and shape a smarter city.

The Group actively integrates AI into its operations and business to harness its transformative potential. By leveraging advanced technology, we aim not only to enhance efficiency and deliver integrated solutions to our corporate clients but also to generate value for the broader community. To support this vision, we have launched various AI-related initiatives designed to nurture internal talent and engage with our customers.

Through the workshops of our GenAI Incubation Programme, a specialised initiative, equips our workforce with the skills and knowledge to effectively utilise AI in their roles, we have empowered over 2,200 employees to date. Additionally, csl AI Stores and their workshops have been pivotal in promoting AI awareness and skills development among the public. In 2024, we conducted over 110 online and offline 5G AI Academy sessions, reaching over 12,000 customers to foster a tech-savvy community.

AI's rapid growth is driving a transformative phase for our business and ESG efforts. By incorporating AI technologies into our services, we aim to foster positive change and contribute to a digitally inclusive society.

#### Enhancing safety in confined spaces with the latest 5G, IoT and AI technologies

In response to increasing concerns surrounding worker safety in confined spaces, HKT has introduced the 5G Manhole Antenna, a vital connectivity solution for confined space monitoring. This innovative initiative extends wireless signals from outdoor environments to underground confined spaces, enabling the seamless operation of IoT and AI technologies, including IoT gas sensors and AI cameras.

This solution is designed to assist facility management in identifying potential risks and ensuring compliance with regulatory requirements in challenging environments. By facilitating seamless data transmission and real-time monitoring, this initiative significantly enhances worker safety and promotes proactive hazard management.

Through this technology, we empower businesses to protect their employees in high-risk settings while fostering a culture of safety and responsibility.

#### In-store AI specialists for free upskilling guidance

CSL Mobile has built a citywide network of 49 AI Stores across Hong Kong, each staffed with professionally trained AI specialists. These stores showcased over 500 AI products, giving customers hands-on access to the latest technologies.

AI specialists are available to provide free guidance and information on 5G and AI applications, empowering customers to seamlessly incorporate these innovations into their lives, whether for learning, work, entertainment or travel.

In 2024, CSL Mobile has reinforced its dedication to AI education by offering free AI workshops and educational content through its 1010 and csl platforms, reaching over 12,000 participants. This initiative underscores CSL Mobile's commitment to fostering digital literacy and enabling the community to thrive in a technology-driven world.



## 3.2 Delivering Customer-Centric Services

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Our commitment lies in meeting and exceeding customer expectations by providing exceptional services and products that enhance the customer journey. We prioritise customer feedback and protect their interests through responsible practices and innovative solutions.

### 3.2.1 Customer Care and Commitment

As a global technology, media and telecommunications provider, our services and products are closely intertwined with the lives of our customers. We remain dedicated to continually elevating service excellence and safety to meet their evolving needs.

#### Content Dissemination and Responsible Marketing

As a responsible corporate, we are committed to providing accurate transparent information about our products and services to support informed customer decisions. Adhering to regulations such as the Trade Descriptions Ordinance (Cap. 362), we provide comprehensive training to our sales and marketing teams to ensure the accuracy of marketing materials.

We have implemented a Group-wide Intellectual Property Rights Policy to ensure our marketing materials comply with copyright laws and prohibit infringement. Additionally, we hold our suppliers and business partners accountable for adhering to the policies and standards outlined in our contracts. In 2024, no non-compliance cases related to advertising or labelling standards were reported.

In terms of content dissemination, our TV operations strictly comply with the Broadcasting Ordinance (Cap. 562) and related directives. Viewers are informed of programme suitability through on-screen symbols and advisories, ensuring responsible broadcasting. For younger audiences, we offer a parental lock feature on adult-oriented programmes and provide child-friendly channels and video-on-demand options on our over-the-top platform.

#### Service Quality and Reliability

Quality and reliability form the cornerstone of our services. The Group adheres to a rigorous set of quality management procedures to ensure service stability and reliability. A dedicated team is responsible for managing customer services and ensuring strict compliance with the guidelines set by the Office of the Communications Authority.

We have attained internationally recognised certifications such as ISO 9001:2015 for our Quality Management System and ISO 20000-1:2018 for our IT Service Management System, demonstrating our alignment with international standards. Our service reliability is continually assessed against the following performance metrics:

	Performance target	Actual performance in 2024
<b>csi</b>		
Network reliability <sup>4</sup>	100%	100%
Service restoration <sup>5</sup>	< 60 minutes	< 60 minutes
<b>1010</b>		
Network reliability <sup>4</sup>	100%	100%
Service restoration <sup>5</sup>	< 60 minutes	< 60 minutes
<b>NETVIGATOR</b>		
Network reliability <sup>6</sup>	99.99%	99.997%
Service restoration <sup>7</sup>	99%	99.95%

### Customer Health and Safety

We are vigilant about the potential health risks associated with excessive electromagnetic radiation. Our cell sites are designed and built to comply with non-ionising radiation (“NIR”) requirement as specified by Hong Kong’s Office of the Communications Authority (“OFCA”) and verified with NIR test where corresponding test reports will be submitted to the OFCA for site activation approval. We will remain abreast of the latest industry trends to ensure the safety of our customers and the wider community.

### 3.2.2 Safeguarding Customer Data Privacy

We are committed to upholding the highest data privacy and security standards and are dedicated to complying with all relevant laws and regulations. Our robust internal control framework is designed to protect customer interests and ensure the integrity of their personal data. We have also complied with applicable privacy laws and regulations across the Group’s jurisdictions, including the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong. For further details on our data privacy policy(ies) and internal control, please refer to the “Driving Business Success with Strong Business Ethics” section.

As part of our dedication to safeguarding customer data, we collect personal data from customers on a “purpose limitation” basis and minimise the amount of personal data collected through various campaigns and projects. Prior to collection, we seek to ensure customers are well informed of the collection purpose(s). Additionally, appropriate technical and organisational measures are in place to avoid leakage of any personal data we retain, which personal data is only retained for so long as necessary to fulfil the specified collection and/or use purpose(s). When engaging third-party data processors to manage or handle our customers’ personal data, we will implement contractual obligations or other appropriate measures to ensure that data processors comply with the Group’s established policies and standards regarding data handling and retention, as well as applicable laws and regulations.

<sup>4</sup> The availability of the core network, i.e. the percentage of the uptime of the core network in an observation period.

<sup>5</sup> The mean time to recover a fault in the core network is targeted within 60 mins after fault identification.

<sup>6</sup> Availability of broadband network.

<sup>7</sup> Provide restoration of services for customers within two calendar days.



## Customer Protection Against Scams

The Group actively combats scams and educates our customers on fraud awareness. We are signatories of the Anti-Scam Consumer Protection Charter, a joint initiative by the Hong Kong Monetary Authority and the Hong Kong Association of Banks to increase public awareness about safeguarding credit card information and preventing scams. Moreover, we provide accessible channels for message authenticity verification and staff training on the Charter. The Group will continue working with regulators, law enforcement agencies, and industry players to better protect our customers against scams, maintaining a secure digital environment.

## Protecting Customer Data Security and Preventing Fraudulent Messages via SMS Sender Registration Scheme

With data privacy and security being critical, CSL Mobile and 1010 have implemented proactive measures to protect customer information by enhancing SMS security, blocking fraudulent messages, and safeguarding customers from SMS fraud. Leveraging our expertise in mobile communication, we assist clients across industries in adopting similar practices.

CSL Mobile and 1010 are recognised as Registered Senders under the SMS Sender Registration Scheme by the OFCA. To help customers identify legitimate communications, our messages are marked with a “#” before sender identities.

As Registered SMS Service Providers authorised by the OFCA, CSL Mobile and 1010 support businesses, particularly in the banking sector, by implementing measures under the SMS Sender Registration Scheme. In addition to boosting SMS security, we provide value-added services to help businesses optimise campaigns and ensure a seamless, secure SMS communication experience. A dedicated hotline offers troubleshooting support services.

## Ensuring Information Security

Safeguarding customer trust is our top priority in all aspects of our business. The Group is committed to enhancing security by implementing industry-leading information protection measures throughout our operations. Additionally, we actively collaborate with other cybersecurity solutions providers to amplify our capability and effectiveness in safeguarding customer data.

Considering the accelerating pace of digital transformation, it is crucial to acknowledge the accompanying rise in cyber risks and attacks exacerbated by the expanded attack surface associated with cloud computing. The Group is dedicated to addressing these challenges by offering cloud compliance checks and vulnerability assessment services to help our customers minimise their cybersecurity exposure.

We maintain a continuous monitoring framework to ensure that customers’ adopted cloud solutions comply with recognised standards, including ISO/IEC 27001 and guidelines from the National Institute of Standards and Technology (“NIST”).

### 3.2.3 Listening to Our Customers

We are committed to maintaining open and transparent communication channels with our customers. We continuously refine our services to meet evolving needs by valuing and acting on customer feedback.

We provide the following means of customer service support at our retail stores and service centres and employ relevant performance monitoring initiatives.



#### Performance Monitoring Initiatives

- Call monitoring programme
- Mystery shopper programme in retail locations
- Customer transaction and Net Promoter Score survey after calls and visits

All customer interactions strictly adhere to our Customer Service Charter, which outlines service quality benchmarks from installation to issue resolution. The Charter also reflects the Group's performance targets for providing quality service, from the installation of new lines and repairs to service restoration.

In 2024, we received over 39,000 compliments and positive feedback from our customers, recognising the high-quality services we provided. However, we also recognise the importance of addressing areas of concern raised in the 977 complaints received in 2024. We view each as an opportunity for improvement, reinforcing our commitment to customer satisfaction.

## 3.3 Deepening Community Engagement

We are committed to community engagement and fostering strong relationships with local organisations. We strive to positively impact society and contribute to sustainable development by participating in community initiatives.

### Total monetary and in-kind contribution



Over HK\$15 million

### Total volunteering hours



2,500

### 3.3.1 Supporting the Economy

To stimulate local consumption during challenging times for the retail and F&B industries this year, HKT and ViuTV launched the 'Reward Yourself, Recharge the City' campaign. This initiative collaborates with shopping malls, retailers, and food and beverage and entertainment businesses to encourage public spending, support local merchants, and contribute to Hong Kong's economy. Merchant offers were promoted on ViuTV channels 99 and 96 and social media platforms. To encourage staff to spearhead consumption, the Group offered HK\$100 as 'pocket money' to its approximately 10,000 employees.



### 3.3.2 Empowering Future Generations

#### Now TV STEM Award 2024

We continued the STEM Award under the theme "The Future Starts with STEM", in collaboration with Chimelong Resort and Sony Hong Kong. The awards incorporate content on animal conservation and scientific knowledge, allowing young participants to learn while having fun.



With Chimelong Resort's support, we broadcasted a "Conservation Starts with STEM" series focused on Land Animals, Marine Life, and Biological Ecology. These episodes leveraged Chimelong's expertise to educate students on conservation and science. Additionally, the "Chimelong Conservation Little Leader Award" encouraged students to creatively design conservation plans, with scholarships and prizes awarded to top entries.

We supported over 120 students to participate in the STEM Awards and organised an ecological photography workshop to teach biodiversity, photography techniques, and conservation science. This year also marks our fourth year

sponsoring The Boys' and Girls' Clubs Association of Hong Kong, supporting over 180 students in 2024. Over the years, nearly 800 students have benefited from our STEM learning initiatives.

## Strive and Rise Programme

As a key supporter of the “Strive and Rise Programme,” a 12-month mentorship initiative aimed at promoting the development and upward mobility of underprivileged youth, we had 45 corporate volunteers serve as mentors and hosted six group activity sessions for more than 150 participants in 2024.

These activities were designed to broaden the horizons of the students and included visits to the Now TV and ViuTV studios, where they learnt about the broadcasting industry and the skills involved from professionals. The students also gained hands-on experience in producing a simple TV programme. Sharing our expertise in technological innovations, we organised two job shadowing visits to the Integrated Service & Operation Center (“ISOC”) for over 35 mentors and mentees, where we explained various technological support provided by HKT services. Three of our corporate volunteers were recognised for their outstanding support to their mentees during the programme’s second cohort. The Group will continue to contribute to the Programme to nurture the growth and development of the next generation.



## Fostering Technology and Innovation through Education

To promote knowledge sharing and innovation, we organised initiatives engaging students and professionals:

- **Online Sharing Sessions:** Four sessions with universities, tech communities, and accelerators attracted over 1,500 registrations and 700 attendees, with an average satisfaction rating of 4.1 out of 5.
- **Lab Visits:** We conducted three visits at WeShare Place, benefiting over 90 students from Zhejiang, Hon Wah College, and the Institute of Electrical and Electronics Engineers.
- **Conferences:** We sponsored the Hong Kong Open Source Conference 2024 and PyCon HK 2024, sharing updates with approximately 11,500 internal staff and external students.





### 3.3.3 Bridging the Digital Divide

The Group emphasises the importance of long-term commitment to society, particularly supporting our senior citizens. Launched in 1992, our “Care for the Elderly Line” programme provides free fixed-line services for eligible Hong Kong residents aged 60 and above. This initiative is part of our Concession Schemes for the elderly, developed in partnership with the Hong Kong Council of Social Service. The Group is also committed to equipping senior citizens with the necessary knowledge and skills to embrace a modern digital lifestyle. As a result, we have introduced various mobile service plans, including the “Smart Pama Service Plan”, to address the challenges that seniors may encounter with modern technology. Additionally, we have served over 2,000 seniors through over 90 sessions of the Smart Pama Workshop in collaboration with elderly homes and NGOs.

### 3.3.4 Investing in Community Impacts

Our long-term community investment initiatives include:

- Telephone hotline support for the fundraising television shows of the Tung Wah Group of Hospitals and Yan Chai Hospital
- Participation in the Teen Hey Buddies Mentorship Programme by the Salvation Army Pathway of Talent and Hope Centre

#### Enhancing Connectivity for the Oxfam Trailwalker 2024



The Oxfam Trailwalker is held in country parks and remote areas with poor signal reception. The Group installed broadband cables and temporary base stations to provide connectivity. We are exploring converting these temporary base stations to permanent ones to support future events and expand 5G coverage for hikers.

As the technology and telecommunications partner of Oxfam Trailwalker since 1986, the Group ensured participants remained connected with support teams by deploying mobile base stations at checkpoints to cover previously unreachable sections of the trail.



In 2024, we successfully provided 59 phone lines, seven fixed broadband connections, and 5G, Wi-Fi, SMS and International Direct Dial services for the event.

#### Other Initiatives in 2024

- Collaborated with the Hong Kong Blind Union to provide audio description services during the UEFA European Football Championship 2024
- Sponsored Métier Minus' fourth charity pop-up that supports non-profit organisations including Green Ladies and St. James' Settlement through payment solution and brand promotion
- Participated in the Uni-China Corporate Charity Run, raising funds for The Salvation Army to assist those in need
- Our volunteers joined “Project LOL Elderly Visit” organised by AS Watson, bringing “lots of love” and “lots of laughs” to the homes and hearts of over 2,000 senior residents alongside fellow corporations
- Participated in Evermove, an event hosted by Evercare Health to team up with residents from NGO care homes to complete fitness challenges with the elderly to help combat social isolation
- Provided digital solutions and volunteers' support to Swire's “Book for Love @\$10” activity
- Supported “Inclusion & Diversity Arena” with Dialogue in the Dark to promote deeper understanding and appreciation of inclusion and diversity through specially curated sports games



## 3.4 Fostering a Thriving Workforce

### 3.4.1 Attracting and Developing Talent

In the rapidly changing telecommunications, media and technology industry, we seek talented individuals who can anticipate and effectively manage emerging challenges. We empower our employees by investing in their professional and personal development, equipping them with the skills necessary for success. The Group has established a comprehensive human capital management framework to drive talent and business success, encompassing staff motivation and promotion, training and development.

In 2024, we conducted an employee survey to assess employee satisfaction, covering job satisfaction, sense of purpose, happiness and stress levels. With participation from over 800 employees, the overall satisfaction rate was 88%. Besides the employee survey, we also conducted a new hire staff engagement survey to provide an additional channel for staff feedback. Over 760 staff participated in the 2024 survey. The feedback is crucial for identifying areas for improvement in our work processes and environment, continuously enhancing employees' work experience and satisfaction.

Recognising our strong efforts in talent attraction, development, and retention, the Group received multiple awards:

- Ding-ge Award by Caijing Magazine and SAP
- Best Team Award, Outstanding Team Award, Best Costume Award, Best Photography Award and Best Video Award in Happy@Work by the Employers' Federation of Hong Kong
- Most Attractive Employer in the Telecommunication Industry by Randstad's 12th Annual Employer Research
- Bronze Award in Campaign Awards for the "Collaborate & Lead" Leadership Development Programme by The Hong Kong Management Association — Award for Excellence in Training and Development 2024
- Bronze Award, Hong Kong Learning Champion in the Category of Above 10,000 Employees in The 2024 LinkedIn Talent Awards



At Happy@Work 2024, our leaders, representatives from different business and function units and Graduate Associates teamed up to promote workplace wellness.

### Talent Attraction

As an industry leader in Hong Kong, the Group is a vital incubator for tech-savvy young talent. We offer these individuals opportunities to participate and gain exposure to the digital transformation of enterprises and the development of smart cities while gaining exposure in the Greater Bay Area. In 2024, the Group has maintained its collaboration with the government and educational institutions in talent acquisition initiatives to cultivate pipelines for future talent. We participated in programmes such as the "Earn & Learn Scheme," through which we have engaged 25 promising young talents as apprentices to further their growth within our organisation.

Our Graduate Development Programme provides university graduates with a valuable opportunity to jumpstart their careers. In 2024, 46 new associates from eight business units participated in our graduate learning journey. Within the programme, our new talent cohort can engage regularly with diverse departments via inter-team knowledge exchange to deepen their understanding of our Group's operations. Immersions at the Now Sports channel's production facilities, Innovation Lab, the i.o.t store by HKT, the Security Operations Centre, and the e-Service Centre have offered invaluable insights into innovation, technological advancements, and data-centric methodologies. Through interactions with senior executives and industry experts, we envision that our Graduate Associates will cultivate substantial influence and excel in their respective positions.

Dedicated to fostering a diverse and adaptable workforce, our Summer Internship Programme provides specialised pathways for both STEM and non-STEM students, accommodating individuals from various academic backgrounds. Through hands-on guidance from seasoned mentors in information technology, engineering, business development, and marketing, coupled with access to cutting-edge technologies and networking opportunities, we aim to expand interns' perspectives within an authentic business setting, equipping them for varied career trajectories. In 2024, 91 summer interns from seven business units participated in our Summer Internship Programme, with 20 receiving part-time internship offers to continue their learning journey with us.

## Talent Development

Our employees are the backbone of the Group. We are committed to cultivating highly skilled and innovative talents through our comprehensive learning and development programmes and initiatives. Here are some highlights of our training programmes:

Type of Training	Training Programmes	Details	Number of Training Sessions	Number of Participants
Leadership	Everyday People Management Upskilling Programme	<p>We introduced an extensive management upskilling programme tailored for new and existing managers. The programme focuses on strengthening key skills throughout the employee lifecycle: Recruit, Relate, Recognise, Review, and Retain.</p> <p>The workshops also highlighted equal opportunities, reinforcing our commitment to workplace inclusivity and equity. By embedding these principles into our managerial framework, we aim to foster a supportive, fair, and diverse work environment.</p>	14	Over 300
	"Collaborate & LEAD" Leadership Development Programme	<p>We continued to deliver the inclusive "Collaborate &amp; LEAD" Leadership Development Programme for managers, designed to enhance leadership proficiencies by promoting a shift in mindset and behaviours that foster cohesion and evolution.</p> <p>The programme integrates self-awareness, digital learning, and hands-on experiences, incorporating real-world situations to aid participants identifying their strengths and areas for improvement.</p>	8	Over 200

Type of Training	Training Programmes	Details	Number of Training Sessions	Number of Participants
New hires	New Joiner Orientation	The Group-wide orientation programme has been redesigned to provide a seamless onboarding experience for new hires. The programme introduces new recruits to the Group's background, operations and key policies and procedures. Additionally, it provides opportunities for them to connect with their peers through both online and offline learning activities.	47	Over 1,500
Sales and services	Skill Transformation	To support the restructuring of our internal business units, we launched a training programme focused on multifaceted skills and knowledge, refining sales and customer engagement techniques, and integrating AI into daily workflows. It also enhances the product knowledge of our frontline staff.	188	Over 2,100
	External Award Training	We encourage our employees to participate in a variety of sales and service awards. These initiatives offer valuable platforms for self-discovery and career development while fostering a sense of belonging.	41	Over 300
	Internal Video Training	<p>We have shifted regular training sessions to an online video format, launching Training Friday, a weekly programme covering product features, benefits and company strategy. We have also introduced Tech Talk, focusing on sales techniques for key products.</p> <p>Our tutorial videos benefit both employees and customers. Employees gain product knowledge to assist customers better, while customers enjoy easy-to-follow self-service guides. This reduces support requests, speeds up issue resolution and increases efficiency. By improving customer satisfaction, these videos help drive sales growth and support our engagement and performance goals.</p>	267	Over 282,000

Type of Training	Training Programmes	Details	Number of Training Sessions	Number of Participants
Engineering	Learning Circle@ Engineering	To enhance colleagues' professional skills, we organised Learning Circle@Engineering, a volunteer expert-led session covering various topics, including cybersecurity awareness, networking practical lab sharing, project management, and AI Bot development.	4	Over 100
	Knowledge Sharing Forums	To share technical knowledge and experience with our Engineering teams, we arranged three online classes in 2024. These sessions covered hot topics such as green management, mmWave application in wireless networks and 5G-Advanced connectivity.	3	Over 300
	Data Privacy Training	To mitigate the risks and potential harm of data breaches, the Office of the Privacy Commissioner for Personal Data in Hong Kong conducted online refresher training sessions. These sessions, designed for all Engineering staff, covered the Personal Data (Privacy) Ordinance, personal information protection practices, data security measures and protocols for handling data breaches.	8	Over 1,700

Type of Training	Training Programmes	Details	Number of Training Sessions	Number of Participants
Technology	TechWatch	TechWatch, a bi-weekly newsletter curated by the Chief Technology Officer's Office, delivers cutting-edge technology news and insights to our colleagues. Its purpose is to spark innovation and fuel the generation of new business ideas across the Group.	25 issues	Over 1,700
	Inspire Sharing Session	Inspire Sharing Session explores GenAI and a spectrum of technology topics, providing a platform for internal experts and renowned external speakers to share their knowledge. Participants gain valuable insights into the current capabilities and future potential of GenAI and other leading-edge technologies. Our in-person sessions and workshops also feature engaging events such as the Google Cloud GenAI sharing, Tech & Strategy Exchange and Adobe Workshop. These gatherings offer opportunities for hands-on learning, idea exchange and in-depth exploration of technology and strategic trends, cultivating a culture of continuous learning and innovation within our organisation.	11	Over 1,000
	GenAI Incubation Programme	In 2024, we launched a new GenAI Incubation Programme, where over 300 participants harnessed the power of GenAI to boost operational efficiency. This collective effort underscores our commitment to empowering our workforce, fostering innovation and achieving sustainable business growth. We also developed a comprehensive Tech Ecosystem, featuring the Group's Sustainable & Scalable AI Roadmap and a Self-Service & No-Code Platform to drive mass adoption across the Group. Through this programme, key departments and AI tech partners shared over 660 minutes of insightful content.	8	Over 2,200



Type of Training	Training Programmes	Details	Number of Training Sessions	Number of Participants
	Insight Exchange Session	Tailored for senior management, Insight Exchange Session bring together leaders from diverse business units every month to facilitate in-depth discussions and critical assessments of the latest global technology trends, strategic insights and operational advancements. Executive workshops showcasing emerging technologies, such as Copilot for Microsoft 365 Executive Workshop, were also held, enabling executives to explore new technologies and strategies for enhanced operational efficiency and organisational success.	7	Over 100
ESG & sustainability	Enhancing ESG Performance and Leading in Sustainability	Led by experienced ESG specialists, the training session, designed for management and senior staff, provided an overview and market update on emerging ESG trends. The management team also participated in interactive discussions, contributing valuable insights to shape the Group's future sustainability strategy and targets.	2	Over 60

### Scheme "A" Programme 2024

Scheme "A" is a structured training programme accredited by The Hong Kong Institution of Engineers ("HKIE") designed to support graduates in their journey to becoming professional engineers. The Group participated in the programme and provided extensive training in areas such as network planning and operations, wireless and core networks, and field services while offering HKIE competencies-based programme, cross-business units on-the-job training, Engineering Supervisors work progress assessment, participants mentorship and cross functional networking opportunities.



Our commitment to employee development and organisational excellence is exemplified through impactful initiatives. The “Collaborate & LEAD” Leadership Development Programme, a joint effort between our Human Resources team and business leaders, has garnered prestigious recognitions, including Bronze Award and Chow Tai Fook Jewellery Group Excellence in Cultural Change under Campaign Awards of the Award for Excellence in Training and Development 2024 organised by The Hong Kong Management Association. This acknowledgement underscores the programme’s success in catalysing a transformative cultural shift, equipping our people managers across various levels and sectors with essential leadership skills crucial for exceptional performance. Aligned with our strategic goals, this initiative fosters innovation and nurtures high-performing cross-functional teams, driving improved business outcomes.

Furthermore, our diverse learning platforms offer employees a blend of online and offline learning opportunities. Through platforms like “Learning@Connect” and business-specific tools like the “E-sales Kit”, employees can access a wealth of digital learning resources. For instance, in 2024, over 260 training videos were accessible to frontline staff via the “E-sales Kit,” accumulating over 282,000 views. These platforms are meticulously designed to cultivate a culture of active knowledge sharing and learning, enabling employees to delve into subjects that spark their curiosity and support their professional development. Additionally, we actively encourage and support our staff in external professional training programmes to remain abreast of the latest industry trends and best practices.

To further enhance employee engagement and satisfaction with our training initiatives, we conduct satisfaction surveys following each training session, allowing us to continuously refine and enhance our training offerings.

Average training hours (including part-time/contract/temporary employees)	Percentage of total employees receiving training (including part-time/contract/temporary employees)
13.9 hours	92%

Performance Review

We have established a comprehensive, systematic and continuous performance development and review mechanism to manage employee performance. This mechanism is the foundation for remuneration considerations, salary reviews, promotions, and future career development.

Encouraging ongoing employee-manager conversations is pivotal for the ongoing development of our workforce. Our review process begins with employees setting goals aligned with five pre-defined growth aspects: financials, customer experience, innovation capability, operational sustainability, and people & organisation, collectively known as our Group’s “5G Growth Model”. Employees then implement their action plans to achieve these objectives. Regular interim reviews provide employees with timely feedback, enabling them to make agile adjustments, track their progress, and improve performance. The formal annual review assesses employees’ achievements against the pre-set goals and identifies development areas for the following year. Performance rating calibration across teams ensures fairness and identifies high performers. Communication and feedback are provided to employees throughout the cycle to support their improvement.

### 3.4.2 Promoting Diversity and Inclusion

We uphold diversity and inclusion in our operations and are resolute in eliminating discrimination. We strive to ensure that all employees are treated equally regardless of gender, disability, family status, race, lineage, nationality, ethnic origin, religion, age, sexual orientation, trade union membership, or any other status protected by law. In 2024, we were not aware of any human rights violation within the Group and therefore no remediation action was needed.

We have launched several key initiatives to embrace diversity in the workplace.



#### Clear Diversity and Inclusion Policies

Integrating diversity and inclusion guidelines into our existing policies, including the Employee Handbook, Human Resources Policy, and Corporate Social Responsibility Policy, to guide our recruitment, hiring, promotion, and professional development practices.



#### Removal of Unconscious Bias

Implementing blind Curriculum Vitae screening techniques to reduce unconscious bias and ensure equal opportunities for all candidates.



#### Fair Employee Experience

Supporting career growth and development of students through the “Earn & Learn Scheme”, in collaboration with the Vocational Training Council.



#### Facility to Support Employees with Diverse Needs

Providing breastfeeding support in the workplace by setting up facilities for new mothers.



#### Inclusive Leadership Training Programme

Offering leadership development, including the Group-wide “Collaborate & LEAD” Leadership Development Programme which emphasises inclusive leadership skills.



#### Regular Employee Survey

Conducting regular employee surveys to assess and identify areas for improvement, including evaluating and addressing employee concerns related to compensation and workplace equity.



#### Employee Communication Platform

Utilising internal social platforms that enable employees to connect, share experiences and actively contribute to diversity and inclusion initiatives.

To promote diversity and inclusion while preventing discrimination, we regularly provide training for our employees and managers. In collaboration with the Equal Opportunities Commission, we organised 17 training sessions on the latest developments of the anti-discrimination ordinances — seven online and ten face-to-face — for over 1,700 employees. Additionally, we integrated a module into our Everyday People Manager Training Programme, emphasising equal opportunities throughout the employee lifecycle. As of 31 December 2024, over 450 people managers have attended this training.



**Gender ratio of  
1:1.4**

We ensure that employees' freedom of association is protected and respect their right to form and join labour or trade unions of their choice without fear of intimidation or reprisal, in accordance with local law. While no official labour union is organised within the Group, staff can contact the Group's management directly via established channels.



**About 33 %  
of management positions  
taken by female**

Both internal and external stakeholders are encouraged to report any actual or suspected misconduct confidentially to the Audit Committee through the Group's independent whistleblowing channel. For further details on the Group's Whistleblower Policy and Procedure Manual, please refer to the "Sustainability at HKT" chapter.

The Group strictly complies with all relevant labour laws and regulations in Hong Kong and other jurisdictions where we operate, including but not limited to the Employment Ordinance (Cap. 57), the Sex Discrimination Ordinance, the Disability Discrimination Ordinance, the Family Status Discrimination Ordinance, and the Race Discrimination Ordinance. Relevant regulatory policies and guidelines have been communicated to our staff through induction programmes and the Staff Handbook. Child and forced labour are strictly prohibited in our business operations. During 2024, there were no discrimination-related breaches or incidents of non-compliance with such laws or regulations.

### 3.4.3 Maintaining Occupational Health and Safety

The Group is committed to upholding high health and safety standards throughout our business operations. We have implemented a Safety Plan aligned with the Code of Practice on Safety Management issued by the Labour Department, ensuring the protection of employees, contractors, customers and the public. We also have a safety management system to ensure that employees' daily routines do not pose risks to their safety or that of others.

#### OSH Management Approach

Led by top management, our Safety Committee oversees the Group's OSH-related matters. In 2024, we enhanced governance by implementing job rotations and appointing new members to our Safety Committee with diverse expertise, including management representatives, operational staff and coordinators. A Statement of Safety and Health Policy, has also been developed. Annual objectives and targets have been established to provide clear guidance for business units with higher OSH risks. For our engineering team in particular, in 2024, we reached our accident rate target of 4.9 per 1,000 workers and less than 12 injury cases<sup>8</sup> respectively.

<sup>8</sup> Referring to injury cases resulting in 3 or more lost days.

OSH Aspects	Corresponding Actions
Emergency preparedness and response	Emergency plans have been developed with a focus on ensuring adequate first-aid facilities for a variety of scenarios. First aid boxes are readily available across workplaces. To enhance preparedness, Business Continuity Plans and a General Guideline for Emergency Situation Handling have been created to address potential emergency scenarios. Emergency escape route maps, contact lists and procedures are prominently displayed throughout the workplace. Emergency teams have been assigned overall responsibility for managing these situations, ensuring swift and organised responses.
Internal inspections	<p>The Group has established a comprehensive OSH inspection schedule that complies with legal requirements. Customised checklists have been developed to document findings during inspections, with specific checklists designed for subcontractors. Regular, surprise safety inspections involving management are carried out to verify adherence to OSH regulations in work environments.</p> <p>Any areas identified for improvement during internal audits are documented in the Plan for Improvement section of the audit report. Each action item is assigned a target completion date, and progress is closely monitored until the next audit cycle to ensure timely resolution.</p>
External verification	<p>Our safety management system undergoes half-yearly evaluations by the audit team from the OSH Council ("OSHC"). These evaluations adhere to the guidelines of the Continual Improvement Safety Programme Recognition of System and ensure our safety practices are robust and effective.</p> <p>The system has been implemented across function units and is regularly assessed for effectiveness.</p>
Procedures for investigating work-related injuries, illnesses, diseases, and incidents	A structured process is in place for reporting and investigating workplace accidents and incidents. After collecting investigation reports, incidents are carefully analysed to identify root causes, considering human factors, equipment, materials, procedures and the environment. The findings are reviewed during Safety Committee meetings, and lessons learned are shared with staff through OSH Briefing Packs, enhancing awareness and preventive measures.
OSH criteria integrated into procurement and contractual requirements	The Tender Review Team evaluates tenders, including assessing bidders' safety management system and appointing safety officers or supervisors. Regular contract review meetings scrutinise all project safety aspects. Contractors are mandated to provide a detailed and thorough safety plan within their contracts, the implementation of which is reviewed during these meetings.



## OSH Risk

We manage OSH risks by systematically assessing hazard items and documenting control practices and procedures in the Master Process Hazard Summary and Line Process Hazard Summary. The Master Process Hazard Summary, periodically reviewed by our Safety Committee, provides detailed specifications of control measures for each hazard and identifies the safety rules and regulations applicable to our operations. Newly identified hazards are thoroughly evaluated and managed to ensure risks are mitigated to an acceptable level.

Following any accidents or incidents, we conduct comprehensive risk assessments and review existing control measures to identify areas for improvement. At the departmental level, line managers develop the Line Process Hazard Summary based on the Master Process Hazard Summary, ensuring that safety practices are tailored to specific operational contexts.

Safe working procedures, method statements and permit-to-work systems have been developed and communicated to relevant personnel by line managers and supervisors. To further mitigate OSH risks, effective control measures are implemented, including in-house safety protocols and the provision of appropriate personal protective equipment. These efforts collectively contribute to a safer and more secure work environment across all operations.

OSH Risk Management	Corresponding Actions	
Hazard identification and risk assessment	Our hazard management process ensures the continuous identification of workplace hazards, enabling timely development of effective risk mitigation and prevention measures. Through our risk assessment process, we evaluate the relative importance of each hazard and analyse the nature and impact of associated risks. Beyond identifying new hazards, we also review existing risk assessments after any workplace incidents.	
Prioritisation and integration of action plans with quantifiable targets to address identified risks	Risk management actions are determined by the severity of the risk:	
	Unacceptable Risk	Requires thorough research and strategic planning by senior management
	High Risk	Demands attention at the senior management level
	Significant Risk	Calls for clear allocation of management responsibilities
	Low Risk	Addressed through routine procedures
	Negligible Risk	Considered acceptable with periodic review
Assessment of progress in decreasing/averting health issues/risks compared to targets	Findings from initial hazard analysis and recommendations are deliberated within the Safety Committee, which reviews the analysis and offers suggestions to line managers. OSH objectives and targets are established annually.	

Example of OSH Risk Identified	Corresponding Preventive Measures
Heat stroke in hot weather/environment	<ul style="list-style-type: none"> <li>• Designating a qualified individual to carry out heat stroke risk assessment to evaluate heat stress risk factors for employees during work</li> <li>• Implementing appropriate preventive and control measures based on identified risk factors, such as adjusting work schedules, installing shading structures, offering ventilation and cooling equipment and reminding employees to stay hydrated and take timely breaks</li> </ul>
Fall from height	<ul style="list-style-type: none"> <li>• Minimising work at heights whenever feasible by supplying and utilising specialised hand tools that enable safe ground-level work</li> <li>• Offering appropriate working platforms or step platforms for tasks at elevated levels</li> <li>• Ensuring the provision and upkeep of safe and adequate means of access to and exit from all work areas</li> </ul>
Work in confined space	<ul style="list-style-type: none"> <li>• Appointing a competent person to perform risk assessment</li> <li>• Permitting entry only for certified workers with appropriate training and experience</li> <li>• Avoiding solitary work within confined spaces; assigning a stand-by person stationed outside</li> <li>• Implement a permit-to-work system</li> </ul>
Electrocution risks during electrical wiring work	<ul style="list-style-type: none"> <li>• Ensuring the electrical work is only conducted by or under the supervision of a registered electrical worker of appropriate grade</li> <li>• Ensuring that all electrical installations are properly earthed</li> <li>• Supplying and ensuring the use of appropriate personal protective equipment</li> </ul>

## OSH Training

To foster a strong OSH culture, the Group offers diverse training and support tailored to staff needs. Regular training sessions were held focus on specific tasks to improve OSH performance and reduce incidents. Our safety management systems and communication strategies have been recognised for their effectiveness. Notable training courses include:

- Safety Training Course for Venue Management Personnel (Confined Spaces Operation)
- Construction Industry Safety Climate Index Survey Workshop
- Safety Training Course for Competent Persons of Confined Spaces Operation
- Application of Automated External Defibrillator and Cardio Pulmonary Resuscitation Course
- Certificate of Competence in Display Screen Equipment Assessment Course
- Safety Training Course for Certified Workers of Confined Space Operation
- Standard First Aid Certificate Course
- Working at Height Safety Course

### 3.4.4 Ensuring Employee Well-being

Employee well-being is one of our key priorities in human capital management. To this end, the Group has launched a suite of benefits and initiatives catered to our staff well-being, including:

- A wide range of sports interest groups such as badminton, golf, runners, table tennis, dragon boat, basketball, soccer, dart, lawn bowling, snooker, volleyball and other activities
- Access to sports facilities including a gymnasium, badminton court, table tennis court, squash court, and other recreational facilities including a BBQ area
- Employee benefits such as concert staff tickets, staff discounts on The Club, DrGo, Now TV, telecommunications services plans and handsets, and discounted price tickets to enjoy events in the city
- Employee Assistance Programme to provide free professional counselling services, covering work or personal life consultation
- Special leave arrangements such as birthday leave, volunteer leave, examination leave and 14 weeks of maternity leave
- Free influenza vaccines for all staff and their dependants under the Group medical scheme
- Group and team building activities such as festival parties, team building workshops, an annual dinner and a Family Carnival
- Participation in the Inter-Hong competition to promote teamwork and camaraderie within sports and recreational teams
- Financial talks to enhance employees' financial literacy and well-being
- Over 78,600 share awards to the employees under the Share Award Scheme







# 4 Enhancing Environmental Stewardship

As a leading telecommunications provider in Hong Kong, we recognise our responsibility to drive sustainable change and minimise our environmental impact. By offering green solutions, we empower our customers and communities to use our products more sustainably.

Within our organisations, we strive to optimise energy efficiency, reduce GHG emissions, promote the responsible use of resources and preserve biodiversity and natural resources. We have also bolstered our climate resilience by proactively identifying, evaluating and managing climate-related risks and opportunities.

Through continuous improvement of our environmental performance and collaboration with stakeholders, we are committed to shaping a sustainable future.

Committing to Environmental Management	Offering Green Solutions
<ul style="list-style-type: none"><li>Enhanced energy efficiency across facilities through the adoption of innovation and technology</li><li>Upgraded operational systems and equipment for better energy efficiency management</li></ul>	<ul style="list-style-type: none"><li>Implemented various measures for sustainable data centre operation</li><li>Engaged with customers on sustainable living solutions through a series of targeted campaigns</li></ul>

## UNSDGs:



# 4.1 Committing to Environmental Management

The Group is committed to minimising adverse environmental impact across our operations and complying with the applicable environmental laws and regulations. These include the Energy Efficiency (Labelling of Products) Ordinance (Cap. 598), Product Eco-responsibility Ordinance (Cap. 603), Product Eco-responsibility (Regulated Electrical Equipment) Regulation (Cap. 603B) and Buildings Energy Efficiency Ordinance (Cap. 610).

As an industry leader, we continue to go beyond compliance in our environmental stewardship. We have established internal standards such as the Energy and Water Management Policy and Guidelines and Gas Emission Reduction Policy to set forth procedures and programmes to promote the proper use of resources. They serve as a framework to guide our departments and subsidiaries in developing environmental management strategies and systems that align with their operations, which are periodically reviewed and updated to ensure relevance to the evolving external factors.

## 4.1.1 Enhancing Energy Efficiency



### Electricity Consumption

#### 2025 Target

Reduce absolute electricity consumption by **13.2%** from our 2018 baseline (2018: 381,123,439 kWh)

#### Performance in 2024

292,525,168 kWh

The Group integrates environmental considerations into various aspects of its business through the implementation of environmental and energy management systems. Recognising that our telecommunications network represents a significant portion of our energy consumption, we are committed to managing this effectively.

Several of our facilities have successfully adopted the ISO 50001 Energy Management System. We are also signatories to the Environment and Ecology Bureau's Energy Saving Charter and the Charter on External Lighting.



## Sustainable Energy Management Practices

Retro-commissioning and retrofitting	<ul style="list-style-type: none"> <li>Enhanced energy efficiency through advanced control systems and by raising default indoor temperatures, particularly in equipment areas</li> <li>Conserved energy at 24-hour operation centres by Implementing display monitor scheduling</li> <li>Maximised lighting efficiency with automated controls that adjust brightness in offices, staircases and carparks</li> <li>Reduced energy consumption by switching non-essential air-conditioners to cold stand-by mode and implementing on-demand cooling system tuning</li> <li>Boosted cooling effectiveness and reduced overall cooling load by strategically grouping equipment with similar environmental needs and modernising air-conditioning systems with free-cooling technologies</li> </ul>
Legacy equipment replacement and upgrade	<ul style="list-style-type: none"> <li>Modernised infrastructure by replacing aged and inefficient equipment, including air-conditioning units, network equipment and Uninterruptible Power Supply ("UPS") systems with more energy-efficient models</li> <li>Optimised UPS utilisation by consolidating multiple systems into one, reducing energy waste</li> <li>Enhanced lighting efficiency by replacing 7,300 traditional fluorescent tubes with Light Emitting Diode ("LED") tubes in exchange buildings, with ongoing replacements planned</li> <li>Minimised greenhouse gas emissions by limiting the duration of performance testing on station generators</li> </ul>
Mobile cell and sites	<ul style="list-style-type: none"> <li>Optimised cooling across approximately 600 sites between 2022 and 2024 by relocating equipment to rooftops and implementing negative pressure design in system rooms to enhance air circulation and reduce air-conditioning use</li> <li>Deployed over 900 energy-efficient dual-band Advanced Antenna Units between 2023 and 2024, integrating base band unit and radio units</li> <li>Leveraged smart power control systems that activate standby mode during periods of inactivity, accommodating peak speed requirements without compromising efficiency</li> <li>Enhanced operational effectiveness and minimised energy loss by integrating over 500 high-voltage power supply system rack cabinets for efficient power delivery</li> </ul>
Network	<ul style="list-style-type: none"> <li>Enhanced energy efficiency of high-speed broadband service by replacing 10G broadband network gateways with 100G models</li> <li>Reduced equipment and energy consumption by consolidating copper broadband digital subscriber lines, recovering over 6,000 DSL equipment cards</li> <li>Boosted data centre energy efficiency by Implementing a modular solution at four exchange buildings, which prioritises network equipment with energy management systems, automated in-row cooling options and remote monitoring and control functions and improves environmental condition regulation for critical equipment (e.g., data services for trading networks, banks and public services)</li> <li>Minimised power consumption for fixed network services by replacing existing 10G links with 100G and 400G links to meet increasing bandwidth demands while reducing overall equipment requirements</li> </ul>
Green energy	<ul style="list-style-type: none"> <li>A total of 121,925 kWh of renewable energy has been generated from solar power systems on four exchange buildings</li> </ul>
Environmental awareness	<ul style="list-style-type: none"> <li>Supported Earth Hour campaign to promote energy savings</li> <li>Conserved energy by limiting the frequency of performance testing on station generators</li> </ul>

## Leading the Future of Fixed-Line Communication with F5G-A Super Broadband

In 2023, the European Telecommunications Standards Institute introduced the F5G-A standard and set new expectations for fixed networks. As the first network provider in Hong Kong to achieve the F5G-A standard, HKT has redefined fixed-line broadband to meet the increasing demands of a digital future.

Our implementation of Green Agile Optical-network (“GAO”) reduces power consumption by over 50% compared to traditional copper networks, lowering operational costs and minimising environmental impact.

### 4.1.2 Reducing GHG Emissions



#### GHG Emissions

##### 2025 Target

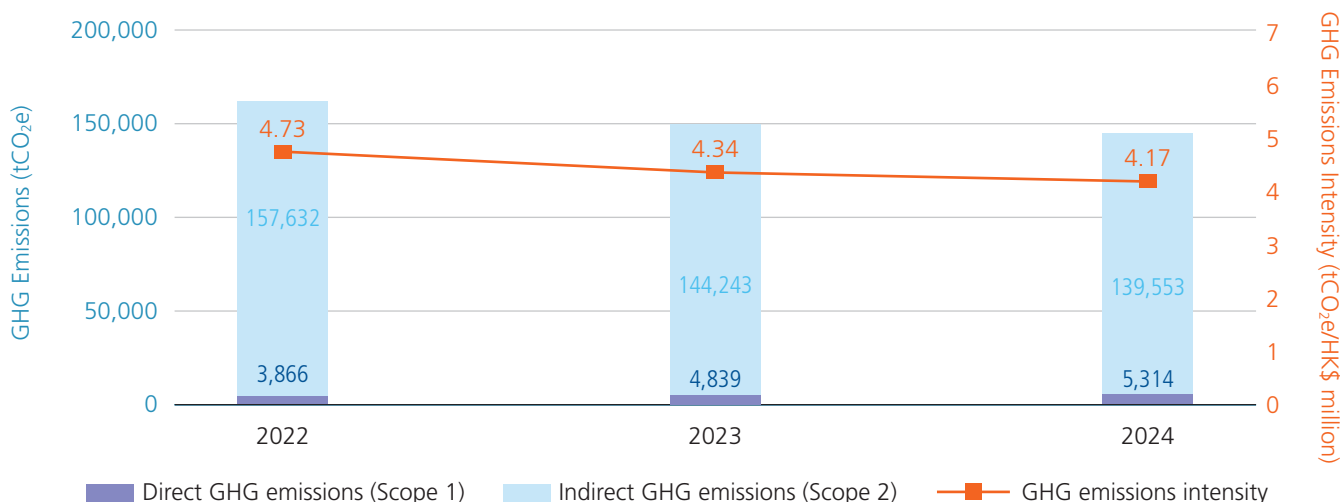
Reduce absolute Scope 1 and 2 GHG emissions by **34.0%** from our 2018 base year (2018: 241,560 tCO<sub>2</sub>e)

##### Performance in 2024

144,867 tCO<sub>2</sub>e

Recognising our corporate responsibility to manage and reduce GHG emissions, we are actively promoting sustainable practices aligned with the Hong Kong Government’s Climate Action Plan 2050. This underscores our dedication to strategic, solution-oriented actions in addressing climate change and supporting Hong Kong’s journey towards carbon neutrality.

Driven by our efforts to enhance energy efficiency and increase renewable energy adoption, in 2024, we achieved a reduction of 40.0%, thereby surpassing our 2025 goal of reducing our absolute Scope 1 and 2 emissions by 34.0% compared to the 2018 base year. For details of our energy efficiency measures and renewable energy adoption, please refer to the “Enhancing Energy Efficiency” section.



Building on our multi-year assessment of Scope 1 and 2 emissions footprints in accordance with the GHG Protocol, we made significant progress in 2024 by initiating an assessment of our Scope 3 emissions. This involved identifying the most material Scope 3 emission categories through internal engagement and desktop research, evaluating our data readiness and providing training to relevant departments to ensure effective data collection.

We conducted a preliminary assessment of specific categories with reliable and readily available data, estimating their emissions for the first year. Data collection for other material categories is underway. We aim to disclose the corresponding data in the coming year as it becomes more available.

### 4.1.3 Managing Waste Effectively



#### Waste

##### 2025 Target

Reduce absolute general waste by  
**16.2%** from our 2018 base year  
(2018: 770 tonnes)

##### Performance in 2024

684 tonnes

The Group maintains stringent waste management protocols, ensuring appropriate waste handling and disposal across our operations. We partner with professional waste-handling service providers to manage our hazardous and non-hazardous waste in compliance with local regulations.

In 2024, we conducted a comprehensive solid waste audit of our offices in PCCW Tower to identify areas for improvement in our waste management practices.

#### Hazardous Waste

In response to the Government’s Producer Responsibility Scheme for Waste Electrical and Electronic Equipment (“WEEE”), we continued to offer complimentary removal and recycling services for electronic wastes to customers during the year, processing nearly 3,000 pieces of WEEE in 2024.

We also continue our collaboration with the Hong Kong Battery Recycling Centre, recycling 261 tonnes of lead-acid batteries. To extend the product lifecycle of broadband modems and customer premise equipment, we collected and refurbished used units, with about 150,000 pieces refurbished in 2024.

Furthermore, we promoted the reuse and recycling of mobile phones through a customer trade-in programme, collecting over 3,500 old mobile phones.

#### Non-hazardous Waste

We adopted multiple initiatives to minimise waste generated in our operations. In terms of paper waste, we reduced paper consumption by over 86 million sheets through e-billing. We also prioritise the reuse of office furniture during relocations and renovations to reduce waste generation. Additionally, we encouraged waste segregation by removing individual desk-side bins and implementing centrally located collection points, increasing the recycling rate at our PCCW Tower offices to 16.8%.

Since 2022, we have recycled food waste from our staff canteen in Lai Chi Kok Exchange. In 2024, 13 tonnes of food waste have been collected and recycled. To further minimise waste, we began phasing out plastic takeaway boxes and tableware in all canteens, applying an additional charge for customers requesting them.

We also participated in the Natural Christmas Trees Recycling Programme and Peach Bloom Recycling Programme organised by the Environmental Protection Department.

### Our Recycling Effort

<b>Toner and ink cartridges</b> 1,116 pieces	<b>Scrap materials</b> 263,090 pieces	<b>Copper</b> 8.64 tonnes	<b>Iron and steel</b> 1.66 tonnes
<b>Paper</b> 83.47 tonnes	<b>Industrial batteries</b> 260.79 tonnes	<b>Food waste</b> 13 tonnes	<b>Christmas trees and peach blossoms</b> 11 pieces

## 4.1.4 Conserving Water



### Water

#### 2025 Target

Reduce water usage intensity (per employee) by **4.4%** from our 2019 base year. (2019: 29.38 m<sup>3</sup>/employee)

#### Performance in 2024

33.45 m<sup>3</sup>/employee

Our commitment to water conservation, reduction and reuse is guided by our Energy and Water Management Policy and Guidelines. We strive to minimise water consumption across our operations while promoting sustainable practices. These efforts have resulted in a 15% reduction in absolute water consumption compared to the 2019 base year, representing a savings of nearly 50,000 m<sup>3</sup>.

### Our Key Water Conservation Initiatives

<b>Installation of water-cooled condensers</b>	Reduced freshwater consumption by collecting wastewater for reuse in the flushing systems
<b>Installation of sensor-activated faucets</b>	Prevented unnecessary water usage
<b>Upgrade to water-efficient fixtures</b>	Replaced inefficient water taps with more efficient models to reduce water consumption without impacting functionality
<b>Maintenance of water-cooled air-conditioning systems</b>	Conducted regular reviews and maintenance to ensure operation efficiency and minimise water waste

### 4.1.5 Managing Climate-related Risks and Opportunities

The growing impacts of climate change are undeniable, with extreme weather events becoming more frequent and intense. This shift, coupled with the global transition to a low-carbon economy, presents both risks and opportunities for our business. Stricter policy requirements, evolving customer preferences and emerging technologies to reduce carbon emissions all contribute to this complex landscape.

We continually assess the impacts of climate-related risks and opportunities on our business, refining our approach as we deepen our understanding and capacity. Our goal is to comprehensively understand the resilience of our business model and value chain under various climate scenarios.

To strengthen our approach, we conducted an ESG Risk Management Training Workshop this year, focusing specifically on climate-related risks and opportunities. This workshop, designed for our first-line risk owners, provided updates on the latest developments in climate-related risk management and reinforced their understanding of climate-related risk assessments within our ERM model. Further details on our ERM can be found in the “Enterprise Risk Management” section.

We have identified a range of climate-related risks and opportunities that are material to our business and have qualitatively assessed their potential impacts. We are actively enhancing our climate resilience through innovation and implementing control measures to mitigate climate-related risks, ensuring the Group’s continued success. To further advance our understanding, we will conduct climate-related scenario analysis in the coming year and anticipate sharing the assessment results in our next report.

Type	Risk or Opportunity	Impact	Our Response
Physical risk – acute	Strong typhoon	Increasingly frequent and intense typhoons, with their associated high winds and rainfall, could damage our telecom infrastructure and disrupt operations.	We have installed IoT sensors in our flood alarm systems to monitor water levels in various locations, enabling timely response and remedial actions. Comprehensive emergency and contingency plans are in place to guide staff in responding to severe weather events.  We conducted training for Risk Officers in November to enhance their understanding of climate-related risks and opportunities impacting the Group.
	Floods	Intense typhoons and extreme rainfall may cause flooding in coastal or low-lying areas with inefficient drainage, potentially damaging telecom facilities and disrupting our services.	
Physical risk – chronic	Rising mean temperature	Chronic shifts in temperature could affect the performance of our infrastructure and facilities, potentially impacting service delivery and business continuity.	Our technical staff closely monitors the performance of network equipment and cooling systems to ensure operation efficiency, particularly during periods of increased temperatures.



Type	Risk or Opportunity	Impact	Our Response
Transition – technology	Transition to low-emission technology	Investment in new low-carbon technologies in telecommunication service delivery and property management may be required to meet evolving needs and expectations, such as using smart technologies to enhance energy savings. Existing technologies may become obsolete and need to be replaced.	We leverage digital solutions and intelligent technologies to optimise energy use across our facilities, improving efficiency, conserving resources and streamlining facility management. We have proactively integrated renewable energy sources into our operations and are actively encouraging the adoption of electric vehicles.
Transition – reputation	Increasing stakeholder concern	Failure to meet stakeholder expectations could negatively impact our reputation.	We actively engage with our customers, stakeholders and the public to understand their expectations regarding ESG and climate action. We are committed to improving our performance and the transparency of our disclosures to maintain stakeholder confidence.
Transition – market	Shift in consumer preference	Changing market demand for low-carbon telecommunications solutions could impact the competitiveness of the Group's products and offerings.	Through regular stakeholder engagement, we are building an understanding of market trends and requirements for low-carbon products in the telecommunications sector.
Opportunity	Development of low-emission goods and services	With higher demand for low-emission products and solutions, the Group's strength in IoT and automation may enhance its competitive edge and further expand its customer base.	The Group has proactively expanded and developed low-emission services to capture market opportunities and respond to changing consumer appetite. For more information on our low-emission products and services, please refer to the "Offering Green Solutions" section.

4.1.6 Managing Nature and Biodiversity Risk

Our contribution to impact mitigation and rehabilitation reflects our dedication to environmental stewardship and sustainable development. We are committed to conserving biodiversity and habitat by conducting environmental impact assessments and collaborating with external experts to develop tailored management plans for sites with high ecological risks. Across our new projects, we employ a mitigation hierarchy that prioritises avoidance, minimisation, restoration and offsetting of potential impacts. In line with our Corporate Social Responsibility Policy, the Group is taking measures to protect biodiversity and local ecosystem when developing and decommissioning infrastructure.

4.1.7 Leveraging Sustainable Finance Initiatives

We actively leverage sustainability-linked financial instruments to support our financial activities, benefitting from the incentives they provide and reinforcing our focus on achieving sustainability outcomes.

Sustainability-linked Loans	Green and Sustainable Deposits
<p>Since raising our first sustainable financing in 2020, we have secured over US\$3.7 billion in sustainability-linked loan facilities from various financial institutions. Over 70% of our loan facilities are now sourced through sustainable financing.</p> <p>KPIs used to evaluate our sustainability performance include GHG emissions, energy consumption and waste management. To assess our environmental impacts and optimise financing terms, we closely track our performance data against the agreed environmental targets on an annual basis.</p>	<p>In 2024, we continued to invest our liquidity in green and sustainable deposits with financial institutions. This participation enables us to work with the financial community to support ESG-oriented projects and organisations, accelerating the transition to a low-carbon, climate-resilient and sustainable economy.</p>

## 4.2 Offering Green Solutions

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We are dedicated to minimising our environmental impact and empowering the wider community on their decarbonisation journey through effective and innovative solutions.

### Smart Energy Solutions for Data Centres

To address the evolving challenges in data centre infrastructure, we offer smart energy solutions that enable data centres to optimise energy consumption and ensure efficient power usage. These solutions integrate IoT sensors and AI-driven analytics for real-time monitoring and adjustments. We improve space efficiency and simplify deployment by incorporating advanced cooling systems and UPS directly into the infrastructure.

These systems provide scalable solutions that adapt to growing computational demands without compromising sustainability. AI-enhanced high-performance computing meets the increasing computational needs of AI workloads while optimising performance, accelerating data processing and significantly improving resource utilisation, supporting academic research and enterprise innovation.

### Smart Charge — One-Stop EV Charging Service

In 2024, Smart Charge continued to expand its EV charging network in Hong Kong. By the end of the year, Smart Charge was managing EV charging infrastructure in 41 residential car parks, encompassing nearly 10,000 parking bays.

### cs! and 1O1O Go Green Campaign

Our Go Green campaign for consumer brands cs! and 1O1O focus on minimising our environmental footprint, fostering community engagement and promoting sustainability education in green mobile and IoT products. Key initiatives include battery and mobile device recycling, offering eco-friendly mobile and IoT lifestyle products and accessories, providing educational workshops for customers and deploying Go Green Specialists at our retail locations to support direct consumer engagement.

We have sourced over 200 environmentally friendly products and assigned clear environmental attributes to the products to help customers make informed purchasing decisions.

### 5G Weather Station

In 2024, we supported the installation of 5G Weather Station in 12 schools in Hong Kong. These stations utilise 5G technology, the IoT and big data to enhance learning.

IoT smart devices transmit data to a cloud platform for analysis and processing, enabling timely notifications to be sent from the 5G Weather Station and allowing students and teachers to gain valuable insights into weather patterns and climate trends of the local area.

We provided training on using smart devices, data collection, automation and programming, along with generating initiatives on extreme weather and sustainable development. In addition to equipping participants with the skills to engage with the technology effectively, it fosters a deeper understanding of environmental issues among students and encourages them to take proactive steps to address climate change.

## 5 Assurance Report

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### VERIFICATION STATEMENT

#### Scope and Objective

Hong Kong Quality Assurance Agency (“HKQAA”) was commissioned by HKT Trust and HKT Limited (“HKT”) to conduct an independent verification for its Sustainability Disclosures (the “selected disclosures”) stated in its Environmental, Social and Governance Report 2024 (“the Report”). The selected disclosures covered the period from 1st January 2024 to 31st December 2024 and represented the sustainability performance of HKT.

The objective of this verification is to provide an independent opinion with a reasonable level of assurance on whether the selected disclosures are prepared in accordance with the following reporting criteria:

- the Environmental, Social and Governance Reporting Guide (“ESG Guide”) set out in Appendix C2 of the Listing Rules of The Stock Exchange of Hong Kong Limited (version effective from 31 December 2023, which remains applicable to annual reports for financial years commencing before 1 January 2025).

The verification team also review the disclosures in the Report by making reference to the following disclosure frameworks, as the Report has been prepared with references to:

- the Global Reporting Initiative’s Sustainability Reporting Standards (“GRI Standards”)

#### Level of Assurance and Methodology

HKQAA’s verification procedure has been conducted with reference to the International Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information (“ISAE 3000”) issued by the International Auditing and Assurance Standards Board. The evidence gathering process was designed to obtain a reasonable level of assurance as set out in the ISAE 3000 by using a risk-based approach.

Our verification procedure included, but not limited to:

- Sampling the sustainability information stated in the Report, e.g. claims and performance data for detail verification;
- Verifying the raw data and supporting information of the selected samples of the sustainability information;
- Interviewing responsible personnel; and
- Checking the internal control mechanism

## Roles and Responsibilities

HKT is responsible for the organization's information system, the development and maintenance of records and reporting procedures in accordance with the system, including the calculation and determination of sustainability information and performance. HKQAA verification team is responsible for providing an independent verification opinion on the selected disclosures provided by HKT for the reporting period. The verification was based on the verification scope, objectives and criteria as agreed between the HKT and HKQAA.

## Independence

HKQAA did not involve in collecting and calculating data or compiling the reporting contents. Our verification activities were entirely independent and there was no relationship between HKQAA and HKT that would affect the impartiality of the verification.

## Limitation and Exclusion

The following limitations and exclusions were applied to this verification due to the service scope, nature of verification criteria, and characteristics of the verification methodology.

- I. Our verification scope is limited to verifying the transcription/transformation of the raw data or information into the selected disclosures, e.g., Claims and Performance Data stated in the Report. The identified sustainability Information may be subject to inherent uncertainty because of incomplete scientific and technical knowledge.
- II. Evaluating the quality of execution and implementation effectiveness of the ESG practices, the appropriateness of the assumptions made, and the estimation techniques applied are outside the scope of our verification.
- III. The verification of raw data or information is based on the use of a sampling approach and reliance on the client's representation. As a result, errors or irregularities may occur and remain undetected.
- IV. Any information outside the established verification period has been excluded.

## Conclusion

1. The verification team reviewed the Report with reference to the GRI Standards and considered that the Report has been prepared by making reference to the contents or parts of the contents of the aforementioned disclosure frameworks.
2. Based on the evidence obtained and the results of the verification process, it is the opinion of the verification team that, with a reasonable level of assurance, the report has been prepared, in all material respects, in accordance with the ESG Guide set out in Appendix C2 of the Listing Rules of The Stock Exchange of Hong Kong Limited (former version, which remains applicable to annual reports for financial years commencing before 1 January 2025).

### Signed on behalf of Hong Kong Quality Assurance Agency



**Connie Sham**

*Head of Audit*

February 2025

Ref: 14945900-VER



## 6 External Charters and Membership

### External Charters

Name of Association	Name of Charter
Department of Health, Labour Department and the Occupational Safety and Health Council	Joyful@Healthy Workplace Charter
Environment and Ecology Bureau	Charter on External Lighting Energy Saving Charter 2024
Green Council	Sustainable Procurement Charter
Hong Kong Monetary Authority and the Hong Kong Association of Banks	Anti-Scam Consumer Protection Charter 2.0

### Memberships

Name of Association	Type of Membership
Asia Video Industry Association	Patron
BCI Central	Member
Business Environment Council	Council Member
Communications Association of Hong Kong	Full Member
eLearning Consortium	Executive Committee Member
Employers' Federation of Hong Kong	Member
Global Technology of Information Industry Association	Founding Member
Groupe Speciale Mobile Association	Contributor Member
GS1 Hong Kong	Industry Solution Partner
Hong Kong Association for Customer Service Excellence	Founding and Corporate Member
Hong Kong Association of Amusement Parks and Attractions	Gold Member
Hong Kong Association of Interactive Marketing	Corporate Member
Hong Kong China Network Security Association	Corporate Member
Hong Kong Computer Society	Corporate Member
Hong Kong Customer Contact Association	Member
Hong Kong E-vehicles Business General Association	Corporate Member
Hong Kong Information Technology Federation	Full Membership
Hong Kong Institute of Marketing	Corporate Member
Hong Kong Interior Design Association	Corporate Member
Hong Kong Investor Relations Association	Corporate (Listco) Member
Hong Kong Retail Technology Industry Association	Platinum Corporate Member
Hong Kong Wireless Technology Industry Association	Executive Committee Member
Intelligent Transportation Systems Hong Kong	Corporate Member

Name of Association	Type of Membership
Interactive Advertising Bureau Hong Kong	Corporate Member
Inter-Hong Games Association	General Committee
International Cable Protection Committee	Member
Joint Utilities Policy Group	Member
OSHC – Green Cross Group	Member
Smart Mobility Technology (C-V2X) Alliance	Member
Society of IATA Passenger Agents	Basic Member
The 3rd Generation Partnership Project	Individual Member
The Association of Accredited Advertising Agencies of Hong Kong	Affiliate Member
The Chinese Manufacturers' Association of Hong Kong	Associate Member
The Hong Kong Advertisers Association	Full Member
The Hong Kong Council of Social Service	Caring Company Patron's Club – Coral Member
The Hong Kong General Chamber of Commerce	Corporate Member
The Hong Kong Institute of Human Resource Management	Corporate Member
The Hong Kong Management Association	Charter Member
World Teleport Association	Regular Member – Medium Corporation
Wireless Broadband Alliance	Operator Member
World Broadband Association	Observer Member

## 7 Performance Data Summary

The tables below present a quantitative overview of the Group's sustainability performance for the year ended 31 December 2024, unless otherwise stated, and historical data is presented for comparison purpose.

### Environmental Performance

Indicators	Unit	2022	2023	2024
<b>Energy consumption</b>				
Total energy consumption	<b>GJ</b>	1,169,348.00	1,101,300.00	1,062,627.69
	<b>kWh</b>	324,819,073.41	305,881,746.38	295,174,594.86
Energy consumption intensity <sup>9</sup>	<b>GJ/HK\$ million</b>	34.27	32.08	30.58
	<b>kWh/ HK\$ million</b>	9,518.51	8,910.04	8,493.50
<b>Indirect energy consumption</b>				
Electricity consumption	<b>kWh</b>	321,896,240.00	302,943,705.00	292,525,168.00
Electricity consumption intensity <sup>9</sup>	<b>GJ/HK\$ million</b>	33.96	31.77	30.30
	<b>kWh/ HK\$ million</b>	9,432.86	8,824.46	8,417.26
<b>Direct energy consumption</b>				
Petrol fuel	<b>L</b>	31,053.17	34,669.82	28,903.50
	<b>kWh</b>	300,947.63	335,997.91	280,114.34
Diesel fuel	<b>L</b>	244,961.80	243,107.94	221,363.98
	<b>kWh</b>	2,621,885.78	2,602,043.47	2,369,312.51
<b>Renewable energy generation</b>				
Solar energy	<b>kWh</b>	124,757.00	119,112.00	121,925.00

<sup>9</sup> The revenue of the Group is used as the basis for energy, electricity, GHG emissions, water and waste intensity calculations.

Indicators		Unit	2022	2023	2024
Waste management: Hazardous waste					
Total hazardous waste produced and recycled <sup>10</sup>					
Solid waste <sup>11</sup>	Produced	tonnes	217.86	330.13	264.83
	Recycled	%	100.00	100.00	100.00
Scrap materials <sup>12</sup>	Produced	pieces	206,696.00	263,184.00	263,090.00
	Recycled	%	100.00	100.00	100.00
Toner and ink cartridges	Produced	pieces	1,438.00	1,294.00	1,116.00
	Recycled	%	100.00	100.00	100.00
Electronic and IT equipment <sup>13</sup>	Produced	pieces	37,133.00	44,751.00	44,676.00
	Recycled	%	100.00	100.00	100.00
Equipment cables <sup>14</sup>	Produced	metres	100,846.00	91,796.00	89,840.00
	Recycled	%	100.00	100.00	100.00
Waste management: Non-hazardous waste					
Total non-hazardous waste produced		tonnes	1,292.05	1,007.72	982.46
• General waste <sup>15</sup>		tonnes	849.77	690.17	684.27
• Construction waste		tonnes	326.76	211.27	204.42
• Other non-hazardous waste <sup>16</sup>		tonnes	115.52	106.28	93.77
Non-hazardous waste intensity <sup>9</sup>		tonnes/ HK\$ million	0.04	0.03	0.03
Total non-hazardous waste recycled		tonnes	115.52	106.28	93.77
• Paper		tonnes	95.89	94.17	83.47
• Scrap metals <sup>17</sup>		tonnes	19.63	12.11	10.30
Material consumption: Packaging materials					
Shopping bags		tonnes	11.04	6.49	6.26
Air emission <sup>18</sup>					
Sulphur oxides (SOx)		kg	3.68	3.77	3.03
Nitrogen oxides (NOx)		kg	1,980.53	1,939.51	1,555.97
Particulate matter (PM)		kg	179.92	176.44	141.87

<sup>10</sup> All the hazardous waste generated by the Group are collected by licensed contractors for proper treatment. We are unable to disclose the total hazardous waste intensity as various types of hazardous waste are recorded in varying units. This has presented challenges for standardisation for precise and accurate reporting.

<sup>11</sup> Solid waste includes industrial batteries (valve-regulated lead-acid battery), office batteries, fluorescent tubes and etc.

<sup>12</sup> Scrap materials such as scrap cables, scrap telephones, obsolete devices and accessories, modems and routers, set-top boxes, WEEE and transmission equipment.

<sup>13</sup> It includes the WEEE under the Producer Responsibility Scheme. The figure does not include WEEE disposed by the Group on behalf of customers.

<sup>14</sup> Equipment cables are used in our broadband business for optical-fibre network coverage.

<sup>15</sup> General waste includes general office waste.

<sup>16</sup> Other non-hazardous waste mainly includes paper and scrap metals.

<sup>17</sup> Scrap metals include copper, metal and steel.

<sup>18</sup> Air emissions are generated from petrol and diesel fuel combustion in vehicles. The emission factors are adopted from "How to prepare an ESG Report – Appendix 2: Reporting Guidance on Environmental KPIs" published by HKEX.

Indicators	Unit	2022	2023	2024
<b>GHG emissions</b>				
Direct GHG emissions (Scope 1) <sup>19</sup>	tCO <sub>2</sub> e	3,866.00	4,839.00	5,314.40
Indirect GHG emissions (Scope 2) <sup>20</sup>	tCO <sub>2</sub> e	157,632.00	144,243.00	139,552.83
Other indirect GHG emissions (Scope 3) <sup>21</sup>	tCO <sub>2</sub> e	1,043.30	979.79	800.30
• Paper consumption	tCO <sub>2</sub> e	833.61	776.34	617.05
• Water consumption and sewage discharge <sup>22</sup>	tCO <sub>2</sub> e	209.69	203.45	183.26
GHG emissions (Scope 1 + 2)	tCO <sub>2</sub> e	161,498.00	149,082.00	144,867.23
GHG emissions (Scope 1 + 2 + 3)	tCO <sub>2</sub> e	162,542.00	150,062.00	145,667.53
GHG emissions intensity <sup>9</sup>	tCO <sub>2</sub> e/ HK\$ million	4.76	4.37	4.19
<b>Water consumption</b>				
Total water consumption <sup>23</sup>	m <sup>3</sup>	328,670.39	318,890.00	280,415.00
Water consumption intensity <sup>24, 9</sup>	m <sup>3</sup> /HK\$ million	9.63	9.29	8.07
	m <sup>3</sup> /employee	34.00	36.61	33.45

<sup>19</sup> Scope 1 emissions comprise HFC and PFC emissions from the use of refrigerants and emissions from our standby emergency generators and vehicle fleet that run on diesel as well as our other vehicle fleet that runs on petrol. The global warming potentials used for calculation are adopted from Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report.

<sup>20</sup> Scope 2 emissions are generated from the electricity consumed by the Group's major operations with individual metres. Emissions factors are adopted from the latest sustainability reports of local power companies.

<sup>21</sup> The figures on Scope 3 emissions are generated from office paper consumption, water consumption and sewage discharge.

<sup>22</sup> The emission factors for freshwater processing and sewage processing are adopted from the latest annual report of the Water Supplies Department and the sustainability report of the Drainage Services Department.

<sup>23</sup> Water consumption of the Group's major operations with individual metres.

<sup>24</sup> Consistent with that of the prior years, the Group has used the total number of full-time equivalent ("FTE") employees in Hong Kong as the basis for the intensity calculations of water consumption. In 2024, the FTE is 8,383.



## Social performance<sup>25</sup>

### Employee Workforce

Indicators	Unit	2022	2023	2024
Total workforce	number	16,015	14,153	13,342
Number of employees with disability		–	79	48
Total workforce by employment type				
Full-time	number (%)	14,588 (91.09%)	13,464 (95.13%)	13,099 (98.18%)
• Male	%	56.72%	57.96%	58.82%
• Female		43.28%	42.04%	41.18%
Part-time	number (%)	1,427 (8.91%)	689 (4.87%)	243 (1.82%)
• Male	%	34.41%	32.80%	27.57%
• Female		65.59%	67.20%	72.43%
Total workforce by contract type				
Permanent	number (%)	10,870 (67.87%)	10,255 (72.46%)	10,114 (75.81%)
Fixed term contract		5,145 (32.13%)	3,898 (27.54%)	3,285 (24.19%)
Total workforce by gender				
Male	number (%)	8,766 (54.74%)	8,030 (56.74%)	7,772 (58.25%)
Female		7,249 (45.26%)	6,123 (43.26%)	5,570 (41.75%)

<sup>25</sup> Data which marked with a symbol “–”, is not available in previous years and new data collection to correspond to the updated HKEX, GRI and other standards, in order to provide additional information on our sustainability performance to the audience.

Indicators	Unit	2022	2023	2024
<b>Total workforce by employment category</b>				
Senior management		664 (4.15%)	660 (4.66%)	684 (5.13%)
• Male		–	453 (68.64%)	474 (69.30%)
• Female		–	207 (31.36%)	210 (30.70%)
Middle management		4,163 (25.99%)	4,141 (29.26%)	4,279 (32.07%)
• Male	number (%)	–	2,730 (65.93%)	2,845 (66.49%)
• Female		–	1,411 (34.07%)	1,434 (33.51%)
Below middle management		11,188 (69.86%)	9,352 (66.08%)	8,379 (62.80%)
• Male		–	4,847 (51.83%)	4,453 (53.14%)
• Female		–	4,505 (48.17%)	3,926 (46.86%)
<b>Total workforce by age group</b>				
Age 30 or below		4,043 (25.24%)	3,272 (23.12%)	2,239 (16.78%)
Age between 31-50	number (%)	9,352 (58.40%)	8,321 (58.79%)	8,162 (61.18%)
Age 51 or above		2,620 (16.36%)	2,560 (18.09%)	2,941 (22.04%)
<b>Total workforce by geographical location</b>				
Hong Kong		10,650 (66.50%)	9,133 (64.53%)	8,524 (63.89%)
Mainland China		–	4,230 (29.89%)	3,904 (29.26%)
United States	number (%)	–	158 (1.11%)	171 (1.28%)
Others		5,365 (33.50%)	632 (4.47%)	743 (5.57%)

## New Hires

Indicators	Unit	2022	2023	2024
Total new hires <sup>26</sup>	number	1,909	2,888	1,455
New hires rate	%	17.56%	28.16%	14.39%
New hires by gender				
Male	number (%)	1,010 (52.91%)	1,550 (53.67%)	871 (59.86%)
Female		899 (47.09%)	1,338 (46.33%)	584 (40.41%)
New hires by age group				
Age 30 or below	number (%)	770 (40.34%)	1,328 (45.98%)	592 (40.69%)
Age between 31-50		999 (52.33%)	1,309 (45.33%)	756 (51.96%)
Age 51 or above		140 (7.33%)	251 (8.69%)	107 (7.35%)
New hires by geographical location				
Hong Kong	number	1,800	1,544	1,271
Others		109	1,344	184
New hires by management level				
Senior management	number (%)	–	57 (1.97%)	44 (3.02%)
Middle management		–	692 (23.96%)	536 (36.84%)
Below middle management		–	2,139 (74.07%)	875 (60.14%)

<sup>26</sup> Total new hires cover to permanent employees only.

## Employee Turnover

Indicators	Unit	2022	2023	2024
Total employee turnover	number	4,750	4,730	2,827
Total employee turnover rate <sup>27</sup>	%	–	38.39%	26.84%
Voluntary turnover rate <sup>28</sup>		32.75%	32.29%	20.76%
Employee turnover rate by gender				
Male	%	27.15%	27.78%	18.04%
Female		40.21%	38.06%	24.48%
Employee turnover rate by age group				
Age 30 or below	%	81.19%	66.74%	63.46%
Age between 31-50		23.43%	25.24%	14.09%
Age 51 or above		7.30%	11.65%	3.32%
Employee turnover rate by geographical location				
Hong Kong	%	27.77%	27.49%	17.76%
Others		52.49%	41.22%	26.04%
Employee turnover rate by management level				
Senior management	%	–	40.65%	26.82%
Middle management		–	16.01%	10.38%
Below middle management		–	9.44%	7.53%

<sup>27</sup> Total employee turnover rate is calculated by dividing the total number of permanent employees who left during the reporting year by the average number of permanent employees for that year, then multiplying the result by 100%.

<sup>28</sup> Voluntary turnover rate is calculated by dividing the total number of permanent employees who voluntarily left during the reporting year by the average number of permanent employees for that year, then multiplying the result by 100%.

## Occupational Health and Safety

Indicators	Unit	2022	2023	2024
Total number of hours worked	hours	19,332,000	17,422,000	16,766,000
<b>Work-related fatalities as a result of work-related injury</b>				
Work-related fatalities reported	number	0	0	0
Work-related fatality rate	%	0%	0%	0%
<b>Work-related injuries</b>				
Lost days due to work injuries	days	2,901	1,384	756
High-consequence work-related injuries (excluding fatalities)	number	0	0	0
High-consequence work-related injuries rate (excluding fatalities)	% (per 200,000 hours worked)	0%	0%	0%
Recordable work-related injuries	number	22	9	16
Rate of recordable work-related injuries	% (per 200,000 hours worked)	0.14%	0.10%	0.19%
<b>Work-related ill health</b>				
Work-related fatalities as a result of work-related ill health	number	0	0	0
Cases of recordable work-related ill health		0	0	0

## Employee Development and Training

Indicators	Unit	2022	2023	2024
Total training hours	hours	465,980	532,331	184,889
Average hours of training by gender				
Male	hours	25.53	29.95	14.08
Female		40.35	47.67	13.54
Average hours of training by employment category				
Senior management	hours	10.14	10.69	9.03
Middle management		7.04	10.67	11.62
Below middle management		44.01	51.44	15.39
Employees trained by gender				
Male	number (%)	6,575 (75.00%)	7,590 (94.52%)	7,214 (92.82%)
Female		6,722 (92.73%)	5,689 (92.91%)	5,072 (91.06%)
Employees trained by employment category				
Senior management	number (%)	526 (79.27%)	639 (96.82%)	628 (91.81%)
Middle management		2,486 (59.71%)	3,902 (94.23%)	4,137 (96.68%)
Below middle management		10,367 (92.66%)	8,738 (93.43%)	7,521 (89.76%)
Employees receiving regular performance reviews by gender				
Male	%	88.77%	91.23%	80.19%
Female		84.43%	86.20%	78.17%
Employees receiving regular performance reviews by employment category				
Senior management	%	96.97%	96.21%	89.04%
Middle management		94.15%	95.73%	83.17%
Below middle management		76.94%	85.60%	76.60%



## Supply Chain Management

Indicators	Unit	2022	2023	2024
Total number of suppliers	<b>number</b>	4,751	5,468	5,941
<b>number of suppliers by geographical region</b>				
Hong Kong	<b>number</b>	3,780	4,218	4,578
Mainland China		381	532	589
Others		590	718	774

## Community Investment

Indicators	Unit	2022	2023	2024
Total monetary and in-kind contributions	<b>HK\$'000</b>	114,896	17,414	15,536
Total volunteer hours	<b>hours</b>	2,659	4,423	2,500

## 8 Content Indexes

### HKEX ESG Reporting Guide Content Index

Mandatory Disclosure Requirements	Reference Chapters or Remarks
Governance Structure	Our Sustainability Governance and Oversight
Reporting Principles	About this Report
Reporting Boundary	About this Report

Aspects, General Disclosure, KPIs	Description	Reference Chapters or Remarks
<b>A. Environmental</b>		
<b>Aspect A1: Emissions</b>		
General disclosure	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 generation of hazardous and non-hazardous waste.	Enhancing Environmental Stewardship
KPI A1.1	The types of emissions and respective emissions data.	Performance Data Summary
KPI A1.2	Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions (in tonnes) and, where appropriate, intensity.	Performance Data Summary
KPI A1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity.	Performance Data Summary
KPI A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity.	Performance Data Summary
KPI A1.5	Description of emission target(s) set and steps taken to achieve them.	Enhancing Environmental Stewardship
KPI A1.6	Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them.	Enhancing Environmental Stewardship

Aspects, General Disclosure, KPIs	Description	Reference Chapters or Remarks
<b>Aspect A2: Use of Resources</b>		
General disclosure	Policies on the efficient use of resources, including energy, water and other raw materials	Enhancing Environmental Stewardship
KPI A2.1	Direct and/or indirect energy consumption by type in total (kWh in '000s) and intensity.	Performance Data Summary
KPI A2.2	Water consumption in total and intensity	Performance Data Summary
KPI A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them.	Enhancing Environmental Stewardship
KPI A2.4	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.	Enhancing Environmental Stewardship
KPI A2.5	Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	Performance Data Summary
<b>Aspect A3: The Environment and Natural Resources</b>		
General disclosure	Policies on minimising the issuer's significant impact on the environment and natural resources.	Enhancing Environmental Stewardship
KPI A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	Enhancing Environmental Stewardship
<b>Aspect A4: Climate Change</b>		
General disclosure	Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.	Enhancing Environmental Stewardship
KPI A4.1	Description of the significant climate-related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.	Enhancing Environmental Stewardship

Aspects, General Disclosure, KPIs	Description	Reference Chapters or Remarks
<b>B. Social</b>		
<b>Employment and labour practices</b>		
<b>Aspect B1: Employment</b>		
General disclosure	<p>Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</p> <p>relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.</p>	Shared Societal Value
KPI B1.1	Total workforce by gender, employment type, age group and geographical region	Performance Data Summary
KPI B1.2	Employee turnover rate by gender, age group and geographical region.	Performance Data Summary
<b>Aspect B2: Health and Safety</b>		
General disclosure	<p>Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</p> <p>relating to providing a safe working environment and protecting employees from occupational hazards.</p>	Shared Societal Value
KPI B2.1	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year	Performance Data Summary
KPI B2.2	Lost days due to work injury.	Performance Data Summary
KPI B2.3	Description of occupational health and safety measures adopted, how they are implemented and monitored.	Shared Societal Value
<b>Aspect B3: Development and Training</b>		
General disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	Shared Societal Value
KPI B3.1	The percentage of employees trained by gender and employee category.	Performance Data Summary
KPI B3.2	The average training hours completed per employee by gender and employee category	Performance Data Summary

Aspects, General Disclosure, KPIs	Description	Reference Chapters or Remarks
<b>Aspect B4: Labour Standards</b>		
General disclosure	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.	Shared Societal Value
KPI B4.1	Description of measures to review employment practices to avoid child and forced labour.	Shared Societal Value
KPI B4.2	Description of steps taken to eliminate such practices when discovered.	Shared Societal Value
<b>Operating Practices</b>		
<b>Aspect B5: Supply Chain Management</b>		
General disclosure	Policies on managing environmental and social risks of the supply chain.	Managing Supply Chain in a Sustainable Manner
KPI B5.1	Number of suppliers by geographical region.	Managing Supply Chain in a Sustainable Manner
KPI B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, how they are implemented and monitored	Managing Supply Chain in a Sustainable Manner
KPI B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	Managing Supply Chain in a Sustainable Manner
KPI B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	Managing Supply Chain in a Sustainable Manner
<b>Aspect B6: Product responsibility</b>		
General disclosure	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	Shared Societal Value

Aspects, General Disclosure, KPIs	Description	Reference Chapters or Remarks
KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	Not a material topic to HKT since majority of business is about service provision.
KPI B6.2	Number of products and service related complaints received and how they are dealt with.	Shared Societal Value
KPI B6.3	Description of practices relating to observing and protecting intellectual property rights.	Shared Societal Value
KPI B6.4	Description of quality assurance process and recall procedures.	Not a material topic to HKT since majority of business is about service provision.
KPI B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored.	Shared Societal Value
<b>Aspect B7: Anti-corruption</b>		
General disclosure	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.	Driving Business Success with Strong Business Ethics
KPI B7.1	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.	Driving Business Success with Strong Business Ethics
KPI B7.2	Description of preventive measures and whistleblowing procedures, how they are implemented and monitored.	Driving Business Success with Strong Business Ethics
KPI B7.3	Description of anti-corruption training provided to directors and staff.	Driving Business Success with Strong Business Ethics
<b>Community</b>		
<b>Aspect B8: Community investment</b>		
General disclosure	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.	Shared Societal Value
KPI B8.1	Focus areas of contribution.	Shared Societal Value
KPI B8.2	Resources contributed to the focus area.	Shared Societal Value



## GRI Standards Content Index

GRI Disclosure	Reference Chapters or Remarks
<b>GRI 1: Foundation 2021</b>	
Statement of use	The Group has reported in accordance with the GRI Standards for the period from 1 January 2024 to 31 December 2024.
<b>GRI 2: General disclosure 2021</b>	
2-1 Organisational details	About HKT About this Report
2-2 Entities included in the organisation's sustainability reporting	About this Report
2-3 Reporting period, frequency and contact point	About this Report
2-4 Restatements of information	There is no restatement in this report.
2-5 External assurance	Assurance Report
2-6 Activities, value chain and other business relationships	About HKT About this Report Managing Supply Chain in a Sustainable Manner
2-7 Employees	Shared Societal Value Performance Data Summary
2-8 Workers who are not employees	This report does not capture this data.
2-9 Governance structure and composition	Sustainability at HKT — Our Sustainability Governance and Oversight
2-10 Nomination and selection of the highest governance body	Annual Report — Combined Corporate Governance Report
2-11 Chair of the highest governance body	Annual Report — Combined Corporate Governance Report
2-12 Role of the highest governance body in overseeing the management of impacts	Annual Report — Combined Corporate Governance Report Sustainability at HKT — Our Sustainability Governance and Oversight
2-13 Delegation of responsibility for managing impacts	Sustainability at HKT — Our Sustainability Governance and Oversight
2-14 Role of the highest governance body in sustainability reporting	Sustainability at HKT — Our Sustainability Governance and Oversight
2-15 Conflicts of interest	Annual Report — Combined Corporate Governance Report
2-16 Communication of critical concerns	Annual Report — Combined Corporate Governance Report Sustainability at HKT — Our Sustainability Governance and Oversight
2-17 Collective knowledge of the highest governance body	Annual Report — Combined Corporate Governance Report
2-18 Evaluation of the performance of the highest governance body	Annual Report — Combined Corporate Governance Report

GRI Disclosure	Reference Chapters or Remarks
2-19 Remuneration policies	Annual Report — Combined Corporate Governance Report
2-20 Process to determine remuneration	Annual Report — Combined Corporate Governance Report Annual Report — Notes to the Consolidated Financial Statements
2-21 Annual total compensation ratio	Annual Report — Financial information
2-22 Statement on sustainable development strategy	Group Managing Director's Message
2-23 Policy commitments	Driving Business Success with Strong Business Ethics
2-24 Embedding policy commitments	Driving Business Success with Strong Business Ethics
2-25 Processes to remediate negative impacts	Driving Business Success with Strong Business Ethics
2-26 Mechanisms for seeking advice and raising concerns	Driving Business Success with Strong Business Ethics
2-27 Compliance with laws and regulations	In 2024, we have not been subject to any significant fines or non-monetary sanctions due to non-compliance with relevant laws or regulations.
2-28 Membership associations	External Charters and Membership
2-29 Approach to stakeholder engagement	Engaging with Our Stakeholders
2-30 Collective bargaining agreements	HKT does not involve in any collective bargaining agreements.
<b>GRI 3: Material topics 2021</b>	
3-1 Process to determine material topics	Sustainability at HKT — Engaging with Our Stakeholders
3-2 List of material topics	Sustainability at HKT — Engaging with Our Stakeholders
3-3 Management of material topics	Sustainability at HKT — Engaging with Our Stakeholders
<b>GRI 201: Economic performance 2016</b>	
3-3 Management of material topics	Annual Report
201-1 Direct economic value generated and distributed	Annual Report
201-2 Financial implications and other risks and opportunities due to climate change	Sustainability at HKT — Enterprise Risk Management
201-3 Defined benefit plan obligations and other retirement plans	Shared Societal Value
201-4 Financial assistance received from government	We have not received significant financial assistance from government.

GRI Disclosure	Reference Chapters or Remarks
<b>GRI 203: Indirect economic impacts 2016</b>	
3-3 Management of material topics	Driving Business Success with Strong Business Ethics
203-1 Infrastructure investments and services supported	Driving Business Success with Strong Business Ethics
203-2 Significant indirect economic impacts	Shared Societal Value
<b>GRI 204: Procurement practices 2016</b>	
3-3 Management of material topics	Managing Supply Chain in a Sustainable Manner
204-1 Proportion of spending on local suppliers	This report does not capture this data.
<b>GRI 205: Anti-corruption 2016</b>	
3-3 Management of material topics	Driving Business Success with Strong Business Ethics
205-1 Operations assessed for risks related to corruption	Driving Business Success with Strong Business Ethics
205-2 Communication and training about anti-corruption policies and procedures	Driving Business Success with Strong Business Ethics
205-3 Confirmed incidents of corruption and actions taken	Driving Business Success with Strong Business Ethics
<b>GRI 206: Anti-competitive behaviour 2016</b>	
3-3 Management of material topics	Annual Report — Combined Report of the Directors
206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	During 2024, there has been no legal action initiated against HKT under the Competition Ordinance or related regulations.
<b>GRI 301: Materials 2016</b>	
3-3 Management of material topics	Enhanced Environmental Stewardship
301-1 Materials used by weight or volume	Performance Data Summary
301-2 Recycled input materials used	This report does not capture this data.
301-3 Reclaimed products and their packaging materials	This report does not capture this data.
<b>GRI 302: Energy 2016</b>	
3-3 Management of material topics	Enhancing Environmental Stewardship
302-1 Energy consumption within the organisation	Performance Data Summary
302-2 Energy consumption outside of the organisation	Performance Data Summary
302-3 Energy intensity	Performance Data Summary
302-4 Reduction of energy consumption	Performance Data Summary
302-5 Reductions in energy requirements of products and services	Enhancing Environmental Stewardship

GRI Disclosure	Reference Chapters or Remarks
<b>GRI 305: Emissions 2016</b>	
3-3 Management of material topics	Enhancing Environmental Stewardship
305-1 Direct (Scope 1) GHG emissions	Performance Data Summary
305-2 Energy indirect (Scope 2) GHG emissions	Performance Data Summary
305-3 Other indirect (Scope 3) GHG emissions	Performance Data Summary
305-4 GHG emissions intensity	Performance Data Summary
305-5 Reduction of GHG emissions	Enhancing Environmental Stewardship
305-6 Emissions of ozone-depleting substances (ODS)	Performance Data Summary
305-7 Nitrogen oxides (NOx), sulphur oxides (SOx), and other significant air emissions	Performance Data Summary
<b>GRI 306: Waste 2020</b>	
3-3 Management of material topics	Enhancing Environmental Stewardship
306-1 Waste generation and significant waste-related impacts	Enhancing Environmental Stewardship
306-2 Management of significant waste-related impacts	Enhancing Environmental Stewardship
306-3 Waste generated	Performance Data Summary
306-4 Waste diverted from disposal	Performance Data Summary
306-5 Waste directed to disposal	Performance Data Summary
<b>GRI 308: Supplier environmental assessment 2016</b>	
3-3 Management of material topics	Managing Supply Chain in a Sustainable Manner
308-1 New suppliers that were screened using environmental criteria	Managing Supply Chain in a Sustainable Manner
308-2 Negative environmental impacts in the supply chain and actions taken	Managing Supply Chain in a Sustainable Manner
<b>GRI 401: Employment 2016</b>	
3-3 Management of material topics	Shared Societal Value
401-1 New employee hires and employee turnover	Shared Societal Value
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Life insurance, disability and invalidity coverage, share options would be available subject to different employment status.
401-3 Parental leave	Our human resources system captures but does not currently calculate the total number of employees who have taken parental leave and are still employed twelve months after their return to work from parental leave or the retention rates of these employees. We have various measures in place to provide job security as well as opportunities for further career development, including our employees returning from parental leave.

GRI Disclosure	Reference Chapters or Remarks
<b>GRI 403: Occupational health and safety 2018</b>	
3-3 Management of material topics	Shared Societal Value
403-1 Occupational health and safety management system	Shared Societal Value
403-2 Hazard identification, risk assessment, and incident investigation	Shared Societal Value
403-3 Occupational health services	Shared Societal Value
403-4 Worker participation, consultation, and communication on occupational health and safety	Shared Societal Value
403-5 Worker training on occupational health and safety	Shared Societal Value
403-6 Promotion of worker health	Shared Societal Value
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Shared Societal Value
403-8 Workers covered by an occupational health and safety management system	Performance Data Summary
403-9 Work-related injuries	Performance Data Summary
403-10 Work-related ill health	Performance Data Summary
<b>GRI 404: Training and education 2016</b>	
3-3 Management of material topics	Shared Societal Value
404-1 Average hours of training per year per employee	Shared Societal Value
404-2 Programmes for upgrading employee skills and transition assistance programmes	Shared Societal Value
404-3 Percentage of employees receiving regular performance and career development reviews	Performance Data Summary
<b>GRI 405: Diversity and equal opportunity 2016</b>	
3-3 Management of material topics	Shared Societal Value
405-1 Diversity of governance bodies and employees	Annual Report — Combined Corporate Governance Report
405-2 Ratio of basic salary and remuneration of women to men	The same policies for remuneration and benefits apply to all employees, irrespective of gender, religion, origin, age, disability or sexual orientation. Due to confidentiality consideration, the ratio of basic salary and remuneration of women to men is unavailable for disclosure.
<b>GRI 406: Non-discrimination 2016</b>	
3-3 Management of material topics	Shared Societal Value
406-1 Incidents of discrimination and corrective actions taken	Shared Societal Value

GRI Disclosure	Reference Chapters or Remarks
<b>GRI 409: Forced or compulsory labour 2016</b>	
3-3 Management of material topics	Shared Societal Value
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	Shared Societal Value
<b>GRI 413: Local communities 2016</b>	
3-3 Management of material topics	Shared Societal Value
413-1 Operations with local community engagement, impact assessments, and development programmes	Shared Societal Value
413-2 Operations with significant actual and potential negative impacts on local communities	Shared Societal Value
<b>GRI 414: Supplier social assessment 2016</b>	
3-3 Management of material topics	Managing Supply Chain in a Sustainable Manner
414-1 New suppliers that were screened using social criteria	Managing Supply Chain in a Sustainable Manner
414-2 Negative social impacts in the supply chain and actions taken	Managing Supply Chain in a Sustainable Manner
<b>GRI 415: Public policy 2016</b>	
3-3 Management of material topics	Sustainability at HKT — Engaging with Our Stakeholders
415-1 Political contributions	HKT is politically and denominationally neutral and does not financially support any parties, opinion or decision makers.
<b>GRI 416: Customer health and safety 2016</b>	
3-3 Management of material topics	Shared Societal Value
416-1 Assessment of the health and safety impacts of product and service categories	Shared Societal Value
416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	During 2024, there has been no incident of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services.
<b>GRI 418: Customer privacy 2016</b>	
3-3 Management of material topics	Shared Societal Value
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Shared Societal Value



**HKT Trust** (A trust constituted on 7 November 2011 under the laws of Hong Kong and managed by HKT Management Limited)  
and

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