SUNeVision Holdings Ltd.

新意網集團有限公司

(Incorporated in the Cayman Islands with limited liability)

Stock Code : 1686

2025/26

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

The technology arm of Sun Hung Kai Properties Limited

CONTENTS

OUR BUSINESS

SUNeVision Holdings Ltd. ("SUNeVision" or the "Company") (Stock Code: 1686) and its subsidiaries (collectively, the "Group") is the technology arm of Sun Hung Kai Properties Limited (Stock Code: 0016) and the largest data centre provider in Hong Kong. As a leading digital infrastructure provider, the Group delivers industry-leading carrier- and cloud-neutral data centre services, underpinned by Asia's premier connectivity platform, supporting the growing demand for secure, reliable and scalable digital infrastructure across Hong Kong and the region.

The Group's integrated data centre ecosystem connects telecommunications carriers, cloud service providers, Internet service providers ("ISPs"), content delivery networks ("CDNs"), over-the-top ("OTT") service providers and enterprises from Hong Kong, Chinese Mainland and around the world. Through its highly connected infrastructure, SUNeVision enables seamless interconnection, low-latency connectivity and direct access to major cloud platforms and digital ecosystems, supporting customers' mission-critical operations and digital transformation.

At the heart of the Group's digital infrastructure is MEGA Campus, its flagship data centre ecosystem comprising MEGA-i, MEGA Gateway, MEGA IDC, MEGA Plus and MEGA Two. These facilities are interconnected through a dedicated dark fibre network and approximately 15,000 cross-connects, providing customers with resilient, high-performance connectivity solutions. Together with the City Points of Presence ("City PoPs") of major submarine cable systems hosted within the Group's facilities, MEGA Campus enables direct connections to multiple cloud platforms and cloud exchanges, reinforcing Hong Kong's position as a leading regional connectivity hub.

OUR BUSINESS

The Group continues to strengthen its digital infrastructure through the addition of the HKIS-1 submarine cable landing station, providing a comprehensive one-stop solution for submarine cable owners and users. These strategic assets further enhance the Group's connectivity ecosystem and reinforce its position as one of Asia's leading connectivity hubs, while supporting Hong Kong's development as an international information hub and a strategic gateway to Chinese Mainland.

SUNeVision operates through three principal business entities that provide complementary digital infrastructure services:

- iAdvantage Limited ("iAdvantage"), which provides carrier- and cloud-neutral data centre services;
- SUNeVision Super e-Technology Services Limited ("Super e-Technology"), which specialises in extra-low voltage ("ELV") systems solutions; and
- SUNeVision Super e-Network Limited ("Super e-Network"), which provides intelligent building network solutions.

Together, these businesses enable the Group to deliver comprehensive, resilient and future-ready digital infrastructure solutions that meet the evolving needs of customers across diverse industries.

As a recognised leader in sustainable business practices, SUNeVision is proud to be a constituent of the Hang Seng Corporate Sustainability Benchmark Index and to have maintained an MSCI ESG Rating of Grade A, reflecting the Group's ongoing commitment to responsible corporate governance, sustainable business practices, and long-term value creation. For more information about the Group and its businesses, please visit www.sunevision.com.

Hang Seng Corporate Sustainability Index Series Member 2025-2026

MSCI ESG RATINGS A

CCC | B | BB | BBB | A | AA | AAA

AWARDS AND RECOGNITIONS

- 2025 Technology Team of the Year (Infrastructure) – Gold Award, 2025 Stevie® Awards for Technology Excellence (The Stevie® Awards)
- Top 100 Data Centre Companies Worldwide, 2025 (Data Centre Magazine)
- Renewable Energy Contribution Award, CLP Smart Energy Award 2025 (CLP Power)
- Sustainable Organisation Merit Award, UNSDG Achievement Awards Hong Kong 2025 (Green Council)
- Recognised Project Award, UNSDG Achievement Awards Hong Kong 2025 (Green Council)
- 2025 China IDC Industry Innovative Development Award (IDCC)
- 2025 Excellence in Overseas Expansion Award (IDCC)
- Outstanding Award for Green and Sustainable Loan Issuer (Data Centre Provider), Hong Kong Green and Sustainable Finance Awards 2025 (Hong Kong Quality Assurance Agency)

OUR REPORTING APPROACH

This Environmental, Social and Governance Report (the "ESG Report" or the "Report") presents SUNeVision's approach, commitments, management practices and performance in relation to environmental, social and governance ("ESG") matters. It demonstrates the Group's ongoing commitment to integrating sustainability into its business strategy and operations while creating long-term value for shareholders, customers, employees, business partners and the wider community.

This Report provides stakeholders with a balanced overview of the Group's sustainability governance, policies, initiatives, performance and future direction during the reporting period. It also illustrates how the Group manages material ESG-related risks and opportunities, including climate-related matters, in support of its long-term business resilience and sustainable development.

REPORTING SCOPE

Unless otherwise stated, this Report covers the Group's environmental and social performance, material ESG topics and sustainability initiatives for the financial year from 1 July 2025 to 30 June 2026 (the "reporting period", or "FY2025/26").

The Report covers the Group's principal business operations in Hong Kong, including its data centre facilities and supporting business functions that are under the Group's operational control, including iAdvantage data centres (MEGA-i, MEGA Gateway, MEGA IDC, MEGA Plus, MEGA Two, MEGA Fanling, JUMBO, ONE, and our first submarine cable landing station, HKIS-1), together with the Group's other subsidiaries, Super e-Technology and Super e-Network. The HKIS-2 is under development, thus, it is not covered in this year's report.

These operations represent the principal sources of the Group's environmental and social impacts and form the basis of the ESG disclosures contained in this Report.

The scope of reporting remains consistent with that of the previous reporting period unless otherwise specified. Where there have been any significant changes to the reporting boundary arising from acquisitions, disposals, new facilities or changes in operational control, these are disclosed in the relevant sections of this Report.

REPORTING FRAMEWORK

This Report has been prepared in accordance with the Environmental, Social and Governance Reporting Code ("ESG Reporting Code") set out in Appendix C2 to the Main Board Listing Rules of the HKEX, including the enhanced climate-related disclosure requirements applicable to the reporting period.

In preparing this Report, the Group has also made reference to the United Nations Sustainable Development Goals ("UNSDGs") and identified those goals that are most relevant to its business operations and sustainability strategy. The Group will continue to support the achievement of the UNSDGs through the implementation of responsible business practices and continuous improvement in ESG performance.

REPORTING PRINCIPLES

This Report has been prepared in accordance with the four reporting principles prescribed under the HKEX ESG Reporting Code, namely Materiality, Quantitative, Balance and Consistency.

MATERIALITY

The Group conducts an annual materiality assessment to identify and prioritise ESG issues that are most significant to its business operations and stakeholders. The assessment takes into consideration stakeholder engagement, industry developments, regulatory requirements, peer benchmarking and enterprise risk assessment. The Board reviews and validates the material ESG issues identified, which form the basis of the disclosures presented in this Report.

QUANTITATIVE

The Group discloses quantitative environmental and social key performance indicators ("KPIs") together with the methodologies, standards, assumptions, calculation tools and conversion factors adopted, where applicable. Comparative data are presented where appropriate to facilitate meaningful assessment of the Group's ESG performance over time.

BALANCE

This Report presents an objective, balanced and transparent account of the Group's sustainability performance during the Reporting Period by disclosing both achievements and areas requiring further improvement. The Board has reviewed and approved this Report and confirms that, to the best of its knowledge, it presents the Group's material ESG matters and performance during the reporting period.

CONSISTENCY

The Group adopts a consistent reporting methodology to facilitate meaningful comparison of ESG performance across reporting periods. Where there are any changes to the reporting scope, methodologies, assumptions, calculation methods or presentation of KPIs that may materially affect comparability, appropriate explanations are provided in the relevant sections of this Report.

FEEDBACK COLLECTION

The Group values the views of its stakeholders and welcomes comments and suggestions on this Report and its sustainability performance. Stakeholders are encouraged to share their feedback through esg@sunevision.com to support the continuous enhancement of the Group's sustainability practices and disclosures.

OUR APPROACH TO SUSTAINABILITY GOVERNANCE

SUSTAINABILITY GOVERNANCE

Sustainability is integral to the Group's long-term business resilience, operational excellence and value creation. As a leading data centre operator, the Group recognises that responsible ESG management is fundamental to maintaining the reliability of its critical digital infrastructure, strengthening stakeholder confidence and supporting sustainable business growth.

The Group is committed to embedding ESG considerations into its corporate strategy, business planning, investment decisions and day-to-day operations. Through a robust governance framework, the Group seeks to identify and manage ESG-related risks and opportunities, enhance operational resilience and create long-term value for customers, shareholders, employees, business partners and the wider community.

The Group has established an ESG governance framework that is aligned with the requirements of the HKEX ESG Reporting Code and supports the principles of sound corporate governance. The framework provides clear accountability for ESG oversight, facilitates effective collaboration between the Board, Board committees and management, and promotes the integration of sustainability considerations into strategic planning, enterprise risk management and operational decision-making across the Group.

ESG GOVERNANCE STRUCTURE

The Group has adopted a three-tier ESG governance structure comprising the Board of Directors (the "Board"), the Corporate Governance Committee and the ESG Working Group.

The Board retains ultimate accountability for the Group's ESG governance, sustainability strategy and sustainability performance. To support the effective discharge of its responsibilities, the Board has delegated oversight of ESG matters to the Corporate Governance Committee.

Acting under authority delegated by the Board, the Corporate Governance Committee serves as the principal governance body responsible for overseeing the Group's ESG strategy, performance, risk management and disclosures. The Committee receives regular reports and recommendations from the ESG Working Group, reviews management's implementation of ESG initiatives and provides recommendations to the Board for endorsement or approval, as appropriate.

The ESG Working Group, comprising senior management and representatives from key business functions, is responsible for implementing the Group's ESG strategy, coordinating sustainability initiatives across the organisation and reporting ESG performance to the Corporate Governance Committee.

This governance framework enables effective oversight, promotes accountability at all levels of the organisation and ensures ESG considerations are systematically integrated into strategic planning, enterprise risk management, operational decision-making and business performance management.

Board Oversight

The Board has ultimate accountability for the Group's ESG governance and sustainability performance. In fulfilling its responsibilities, the Board focuses on strategic direction, governance oversight and major decision-making, while delegating detailed oversight and monitoring of ESG matters to the Corporate Governance Committee.

The Board is responsible for:

– approving the Group's sustainability vision, ESG strategy and long-term priorities;

– approving ESG-related policies, management approaches, objectives and targets following review and recommendation by the Corporate Governance Committee;

– approving significant ESG-related strategic initiatives and major investments relating to sustainability;

– overseeing the effectiveness of the Group's ESG governance framework, risk management and internal control systems;

– considering and approving recommendations from the Corporate Governance Committee regarding material ESG matters, including climate-related risks and opportunities; and

– approving the annual ESG Report.

The Board receives regular updates from the Corporate Governance Committee on ESG performance, material ESG matters, progress against sustainability objectives, climate-related developments and emerging regulatory requirements. This enables the Board to exercise effective oversight while maintaining ultimate accountability for the Group's ESG governance and sustainability performance.

Corporate Governance Committee

The Corporate Governance Committee operates under authority delegated by the Board and serves as the principal governance body responsible for overseeing the Group's ESG management framework, sustainability performance and ESG-related disclosures. The Committee assists the Board by reviewing ESG strategies, objectives, targets, performance and material ESG matters, and provides recommendations to the Board for endorsement or approval, as appropriate.

In accordance with its Terms of Reference, the Corporate Governance Committee is responsible for reviewing the Company's ESG strategy, targets and performance, as well as ESG-related disclosures. The Committee also oversees the Group's corporate governance practices and supports the Board in ensuring compliance with applicable corporate governance requirements.

In fulfilling its ESG oversight responsibilities, the Corporate Governance Committee reviews management's assessments, recommendations and progress updates prepared by the ESG Working Group. Where appropriate, the Committee considers technical analyses and professional advice developed with the support of an independent external sustainability consultant, including advice relating to ESG strategy development, target setting, materiality assessment, regulatory developments, sustainability reporting practices and market trends.

OUR APPROACH TO SUSTAINABILITY GOVERNANCE

The Corporate Governance Committee is responsible for:

- reviewing the Group's ESG strategy, management approach and implementation progress, and making recommendations to the Board;
- reviewing ESG objectives, targets, key performance indicators and sustainability performance, and recommending material changes to the Board for approval;
- reviewing management's progress in implementing ESG policies, programmes and strategic initiatives, and providing guidance where appropriate;
- reviewing material ESG matters, including ESG-related risks and opportunities that may affect the Group's operations, financial performance, reputation and long-term resilience;
- reviewing climate-related risks and opportunities, including management's assessment of physical and transition risks, mitigation measures and resilience initiatives;
- reviewing the outcomes of the Group's annual materiality assessment and considering their implications for the Group's sustainability priorities, strategy and disclosures;
- reviewing emerging ESG regulations, stakeholder expectations, industry developments and sustainability best practices relevant to the Group;
- reviewing the effectiveness of the Group's ESG governance framework, ESG risk management processes and related internal control systems;
- reviewing the Group's annual ESG Report and ESG-related disclosures, including the appropriateness, completeness and consistency of reported information, before recommending submission to the Board for approval; and
- reviewing the ESG training and continuous professional development of Directors.

The Corporate Governance Committee receives regular updates from the ESG Working Group on ESG performance, implementation progress, material topics, climate-related matters and emerging sustainability developments. The Committee evaluates management's recommendations, provides strategic guidance where appropriate and escalates significant ESG matters to the Board for endorsement or approval.

Through this delegated oversight structure, the Corporate Governance Committee supports the Board in maintaining effective oversight of sustainability matters while ensuring that ESG considerations are appropriately integrated into the Group's strategic planning, risk management and business operations.

ESG Working Group

The ESG Working Group operates under the oversight of the Corporate Governance Committee and is responsible for implementing the Group's sustainability strategy and coordinating ESG management across the organisation.

The Working Group comprises senior management and representatives from key business functions, including facility management, operations, information security, human resources, finance, investor relations, procurement, legal and compliance, risk management and internal audit.

To support the continuous enhancement of the Group's sustainability performance and disclosures, the ESG Working Group works closely with an independent external sustainability consultant. The consultant provides technical advice and professional support on sustainability strategy development, ESG target review, materiality assessment, regulatory developments, ESG reporting and disclosure practices, while management retains responsibility for implementing ESG initiatives and recommendations. This collaboration enables the Group to align its sustainability management and disclosures with evolving regulatory requirements, recognised reporting frameworks and market best practices.

The ESG Working Group is responsible for:

- implementing the ESG strategy, policies and action plans approved by the Board and overseen by the Corporate Governance Committee;
- coordinating ESG initiatives across business units and monitoring implementation progress;
- identifying, assessing and monitoring material ESG-related risks and opportunities;
- monitoring emerging ESG regulations, market developments and industry best practices relevant to the data centre industry;
- coordinating stakeholder engagement activities and conducting the Group's annual materiality assessment, with technical support from the external sustainability consultant;
- reviewing the Group's sustainability strategy, ESG objectives and targets periodically, taking into account business developments, stakeholder expectations, regulatory requirements and professional advice from the external sustainability consultant;
- collecting, reviewing and verifying ESG performance data;
- monitoring progress against ESG objectives, targets and key performance indicators;
- coordinating the implementation of climate– related initiatives, including climate adaptation, resilience and decarbonisation measures;
- preparing the annual ESG Report and supporting ESG-related disclosures with reference to applicable reporting standards and external technical advice; and
- reporting ESG performance, material ESG matters and recommendations to the Corporate Governance Committee.

OUR APPROACH TO SUSTAINABILITY GOVERNANCE

The ESG Working Group reports regularly to the Corporate Governance Committee and provides timely updates on significant ESG developments and emerging risks. The Committee reviews management's reports, together with recommendations developed with the support of the external sustainability consultant where appropriate, provides strategic direction to management and escalates significant ESG matters to the Board for endorsement or approval.

BOARD COMPETENCIES AND CLIMATE-RELATED OVERSIGHT

The Board recognises that effective oversight of sustainability and climate-related matters requires directors to collectively possess an appropriate balance of knowledge, skills and experience in corporate governance, sustainability, climate governance, risk management and the data centre industry. Collectively, the Board draws upon expertise in finance, engineering, technology, infrastructure development, corporate governance and business operations to evaluate the potential impacts of ESG and climate-related matters on the Group's long-term resilience and value creation.

To support the Board in discharging its oversight responsibilities, the Corporate Governance Committee regularly reviews developments in sustainability and climate-related governance, monitors changes in regulatory requirements and market expectations, and considers whether the Board collectively maintains the competencies necessary to oversee the Group's sustainability strategy and climate resilience effectively.

The Group periodically reviews the Board's collective skills and competencies, taking into account the Group's business strategy, the evolving regulatory landscape and emerging sustainability developments. Directors are encouraged to participate in continuing professional development programmes, management briefings and external training covering sustainability, climate governance, ESG reporting and other relevant topics. Details of Directors' professional development are set out in the Corporate Governance Report.

Climate-related matters are incorporated into the regular agenda of the Corporate Governance Committee and are reported to the Board where appropriate. This enables the Board to consider climate-related risks and opportunities alongside strategic planning, enterprise risk management, capital investment and business resilience, while relying on the Committee's detailed review and recommendations.

The Group also considers sustainability and climate-related competencies as part of Board composition and succession planning. The Nomination Committee annually reviews the composition of the Board to ensure an appropriate balance of skills, experience, diversity and competencies relevant to sustainability and climate governance.

ESG RISK MANAGEMENT AND CLIMATE GOVERNANCE

The Group integrates ESG-related risks into its Enterprise Risk Management Framework to ensure sustainability considerations are embedded within strategic planning, investment decision-making and operational management.

The ESG Working Group regularly identifies, assesses and monitors ESG-related risks and opportunities that may affect the Group's operations, financial performance, reputation and long-term resilience. Particular attention is given to material ESG topics identified through the annual materiality assessment, together with risks identified through the Enterprise Risk Management Framework.

Climate-related risks and opportunities are assessed as an integral component of the Group's enterprise risk management process. The ESG Working Group supports management in evaluating both physical and transition climate-related risks, identifying opportunities arising from the transition to a lower-carbon economy, monitoring climate-related performance and implementing appropriate mitigation, adaptation and resilience measures.

The ESG Working Group reports material ESG and climate-related matters to the Corporate Governance Committee on a regular basis. The Committee reviews the effectiveness of the Group's ESG risk management framework, climate governance arrangements and related internal control systems, and evaluates whether management has implemented appropriate measures to manage material ESG and climate-related risks and opportunities.

Where significant ESG or climate-related matters arise, the Corporate Governance Committee reports its assessment and recommendations to the Board. The Board considers the Committee's recommendations in determining the Group's strategic direction, approving significant sustainability initiatives and overseeing the effectiveness of the Group's overall ESG governance framework.

Further details regarding the Group's climate-related governance, climate risk management and resilience are provided in the "**Climate Mitigation and Resilience**" section of this Report.

THE NODES FRAMEWORK: ALIGNING SUSTAINABILITY WITH IMPACT

During the reporting period, the Group introduced the NODES framework, a structured approach to guide the sustainability efforts across five strategic pillars: Nurturing People, Operating Sustainably, Delivering Responsible Services, Enabling Ethical Governance, and Supporting Communities. Each pillar is carefully mapped to the Group's relevant material topics, ensuring alignment with our key environmental, social, and governance priorities, while also contributing to the advancement of the United Nations Sustainable Development Goals (UNSDGs). This framework provides a clear and coherent structure for managing our sustainability initiatives, driving long-term value creation, and demonstrating our commitment to responsible business practices, stakeholder engagement, and societal impact.

OUR APPROACH TO SUSTAINABILITY GOVERNANCE

Pillar	Material Topics	Relevant UNSDGs
Nurturing People The Group cultivates a skilled, diverse, and resilient workforce by prioritising fair human capital practices, an inclusive culture, continuous learning, and a safe, supportive environment that empowers employees to thrive and contribute to the Group's success.	• Human capital management • Diversity, equity, and inclusion • Learning and development • Health, safety, and wellbeing	3 Good Health and Well-Being 4 Quality Education 5 Gender Equality 8 Decent Work and Economic Growth 10 Reduced Inequalities
Operating Sustainably The Group minimizes environmental impact and optimizes resource efficiency across our operations, ensuring sustainable energy use, waste management, and emissions control in line with industry best practices.	• Energy management and carbon emission • Climate mitigation and resilience • Waste management • Water management • Green finance	6 Clean Water and Sanitation 7 Affordable and Clean Energy 12 Responsible Consumption and Production 13 Climate Action 14 Life Below Water 15 Life on Land
Delivering Responsible Services The Group provides reliable, secure, and high-quality data centre services, underpinned by rigorous standards, innovation, and customer-focused solutions that build long-term trust.	• Service reliability and quality • Technological innovation • Cybersecurity and data privacy • Customer experience and complaint handling	9 Industry, Innovation and Infrastructure 12 Responsible Consumption and Production
Enabling Ethical Governance The Group upholds integrity, transparency, and accountability in all business activities, including supply chain management, risk oversight, and regulatory compliance, fostering responsible and sustainable growth.	• Business ethics and anti-corruption • Risk management • Supply chain management	8 Decent Work and Economic Growth 12 Responsible Consumption and Production 16 Peace, Justice and Strong Institutions
Supporting Communities The Group actively contribute to societal wellbeing through community investment, volunteering, and initiatives that enhance education, digital inclusion, and the resilience of the communities in which we operate.	• Community engagement and investment	4 Quality Education 10 Reduced Inequalities 11 Sustainable Cities and Communities 17 Partnerships for the Goals

MATERIALITY GOVERNANCE AND ASSESSMENT

SUNeVision recognises that understanding and managing sustainability-related impacts, risks and opportunities is fundamental to creating long-term value and maintaining the resilience of its business. In accordance with the HKEX ESG Reporting Code, the Group conducts an annual materiality assessment to identify, assess and prioritise the sustainability matters that have the greatest impacts on the economy, environment and people, and which are most relevant to the Group's long-term strategy, operational resilience and stakeholder expectations.

As a leading data centre operator supporting mission-critical digital infrastructure, the Group recognises that its operations have significant interactions with the environment, customers, employees, suppliers and the wider community. The materiality assessment therefore considers both the sustainability impacts arising from the Group's operations and value chain, as well as the sustainability-related risks and opportunities that may influence its long-term business performance and ability to create sustainable value.

Governance of the Materiality Assessment

The Board has overall responsibility for overseeing the Group's sustainability strategy, including the identification, assessment and management of sustainability-related risks and opportunities. The Board reviews and approves the material sustainability topics to ensure they remain aligned with the Group's strategic priorities, business developments and stakeholder expectations.

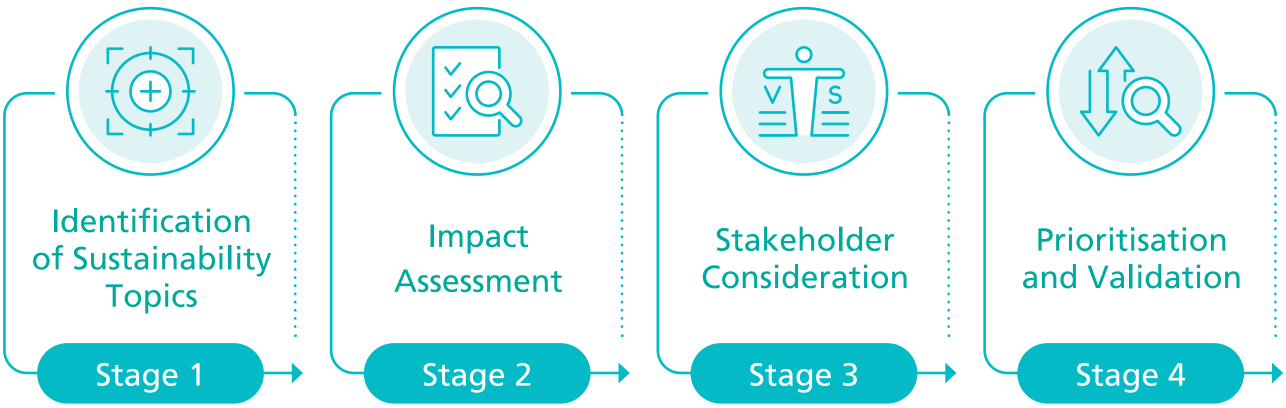
During the reporting period, the ESG Working Group coordinated the materiality assessment. The assessment results, together with the recommended updates to the material topics, were reviewed by senior management before being submitted to the Board for approval.

The materiality assessment is conducted annually to ensure that the Group's sustainability priorities remain responsive to changes in the operating environment, stakeholder expectations, regulatory developments and emerging sustainability trends.

Impact Materiality Assessment Approach

During the reporting period, the Group adopted an impact materiality assessment approach to evaluate the actual and potential impacts arising from its operations, products and services across the environmental, social and governance dimensions. The assessment was conducted with reference to the HKEX ESG Reporting Code and recognised international sustainability reporting practices.

The assessment comprised four key stages.



OUR APPROACH TO SUSTAINABILITY GOVERNANCE

Stage 1: Identification of Sustainability Topics

With the aid of the external consultant, the Group reviewed its existing material topics alongside emerging sustainability issues relevant to the data centre industry. The review considered:

– megatrends;

– the previous year's materiality assessment results;

– changes in regulatory requirements, including updates to the HKEX ESG Reporting Code;

– international sustainability developments and reporting practices;

– peer benchmarking within the data centre, technology and infrastructure sectors;

– the Group's strategic priorities and business developments; and

– emerging sustainability-related risks and opportunities, including green finance, technological innovation and evolving cybersecurity risks.

Stage 2: Impact Assessment

Each sustainability topic was evaluated based on the significance of its actual and potential impacts on the economy, environment and people across the Group's operations and value chain. The assessment considered a combination of factors, including the scale of the impact, the scope of potentially affected stakeholders, the likelihood of occurrence, the degree of irremediable harm where impacts occur, the severity of both actual and potential impacts, the expected time horizon over which impacts may arise, and the connection of the impacts to the Group's own operations, upstream suppliers and downstream customer relationships.

This approach enables the Group to identify those sustainability topics that may have the most significant impacts on the economy, environment and society, while also supporting the management of sustainability-related risks and opportunities that could influence the Group's long-term resilience and value creation.

Stage 3: Stakeholder Consideration

SUNeVision values the views and expectations of its stakeholders and maintains regular dialogue to better understand their concerns and priorities. Feedback collected through established engagement channels informs the Group's sustainability strategy, supports the identification of sustainability-related impacts, risks and opportunities, and serves as a key input to the annual materiality assessment.

Stakeholder Group	Key Engagement Channels
Customers	Customer satisfaction surveys, account management meetings, business reviews, customer support channels, industry events
Employees	Employee engagement and satisfaction surveys, town hall meetings, performance reviews, training programmes, internal communications
Shareholders and Investors	Annual General Meeting, annual and interim reports, ESG Report, investor meetings, corporate website, announcements
Suppliers and Contractors	Supplier assessments, supplier meetings, procurement processes, contract management, business reviews
Regulators and Government Authorities	Regulatory submissions, meetings, industry consultations
Business Partners	Partnership meetings, project collaboration, technical workshops, industry forums
Local Communities	Volunteer activities, community partnerships, ESG Report, corporate website

The Group reviews stakeholder feedback regularly and incorporates the outcomes into its management processes, including the annual materiality assessment, to ensure that its sustainability priorities remain responsive to evolving stakeholder expectations and business developments.

Stage 4: Prioritisation and Validation

Following the assessment, each sustainability topic was prioritised according to its significance to the Group's impacts on the economy, environment and people, together with its relevance to the Group's long-term business strategy and stakeholder expectations.

Topics assessed as having the highest impact severity and strategic relevance were classified as Tier One Material Topics, while topics with significant but comparatively lower impacts were classified as Tier Two Material Topics. The assessment results were reviewed by the ESG Working Group and subsequently endorsed by the Board.

Updates to Material Topics

Following the annual review, the Group refined its material topics to better reflect evolving business priorities, industry developments and stakeholder expectations. The key updates include the addition of Green Finance as a new material topic, the separation of Service Quality and Innovation into Service Reliability and Quality and Technological Innovation, and the renaming of several material topics to better align with current ESG practices and the Group's sustainability management framework.

These refinements strengthen the alignment between the Group's sustainability strategy, emerging industry developments and stakeholder expectations, while improving the clarity and consistency of ESG disclosures.

Material Topics and Level of Materiality

Based on the assessment results, the Group classified its material sustainability topics into two levels according to their significance.

OUR APPROACH TO SUSTAINABILITY GOVERNANCE

– **Tier One Material Topics** represent the sustainability matters with the greatest impacts on the Group's long-term value creation, operational resilience and stakeholder confidence. These topics receive enhanced management attention, Board oversight, dedicated management programmes, performance monitoring and, where appropriate, measurable targets.

– **Tier Two Material Topics** remain important sustainability matters that are actively managed through the Group's governance framework, operational policies and continuous improvement initiatives.

Level of Materiality	Material Topics / Report Section	Pillar of the NODES Framework
Tier One	Human Capital Management	Nurturing People
	Health, Safety, and Wellbeing	
	Energy Management and Carbon Emissions	Operating Sustainably
	Service Reliability and Quality	Delivering Responsible Services
	Technological Innovation	
	Cybersecurity and Data Privacy	
Tier Two	Diversity, Equity and Inclusion	Nurturing People
	Learning and Development	
	Climate Mitigation and Resilience	Operating Sustainably
	Waste Management	
	Water Management	
	Green Finance	
	Customer Experience and Complaint Handling	Delivering Responsible Services
	Business Ethics and Anti-corruption	Enabling Ethical Governance
	Risk Management	
	Supply Chain Management	
	Community Engagement and Investment	Supporting Communities

The Group's material topics form the foundation of its sustainability strategy and guide the development of management approaches, policies, performance indicators, targets and disclosures presented throughout this ESG Report. The assessment outcomes provide important insights for the review of the Group's enterprise risk management framework and are considered, where relevant, in identifying and managing sustainability-related risks and opportunities, supporting strategic decision-making, resource allocation and long-term business resilience.

The Group will continue to review its material topics on an annual basis to ensure they remain responsive to changes in its operating environment, stakeholder expectations, regulatory requirements and emerging sustainability issues.

NURTURING PEOPLE

SUNeVision's culture is rooted in its Vision, Mission, and Values, which emphasise collaboration, ownership, courage, and innovation, guiding how employees work together and contribute to the Group's success. The "Nurturing People" pillar reflects our commitment to a skilled, diverse, and resilient workforce, focusing on Human Capital Management, Diversity, Equity, and Inclusion, Learning and Development, and Health, Safety, and Wellbeing. These initiatives ensure fair recruitment, career progression, inclusive opportunities, continuous skill growth, and a safe, supportive environment, collectively fostering engagement, motivation, and long-term organisational performance.

Material topics

Human Capital Management | Diversity, Equity, and Inclusion | Learning and Development | Health, Safety, and Wellbeing

NURTURING PEOPLE

HUMAN CAPITAL MANAGEMENT

Attracting Talent

SUNeVision recognises that its long-term success is underpinned by the quality of its people. The Group has established a talent pipeline development strategy, explicitly aligned with its long-term business objectives and workforce planning priorities. This strategy is designed to ensure a sustainable pipeline of skilled and future-ready professionals to support business expansion, technological advancement, and operational continuity.

The Group adopts a proactive and multi-channel approach to talent acquisition, leveraging career exhibitions, campus outreach initiatives, university engagement activities, and government-led recruitment programmes to connect with high-potential candidates. Job applications can be submitted via email or through the Group's online application portal, providing accessible and flexible channels for prospective candidates. These efforts enable the Group to engage early with emerging talent, strengthening its succession pipeline and ensuring a steady inflow of capabilities required to deliver its long-term strategy.

Since 2021, the Employee Referral Programme further complements external sourcing strategies, encouraging internal networks to identify suitable candidates while reinforcing a culture of shared ownership in building high-performing teams.

To support our diversity ambitions, we have broadened our talent search beyond local markets by engaging mainland and international candidates, enriching perspectives and capabilities across the organisation. This global approach to recruitment enhances our ability to attract high-calibre talent while fostering a more culturally diverse and inclusive workforce aligned with our long-term growth ambitions.

Zero Tolerance for Child and Forced Labour

We maintain a strict zero-tolerance policy towards child and forced labour, and our operations strictly comply with all relevant laws and regulations designed to prevent such practices, including but not limited to the Employment Ordinance (Cap. 57). Our Recruitment Policy provides a comprehensive framework for the entire hiring process, ensuring that every step adheres to ethical and legal standards. Therefore, we do not have any child and forced labour cases.

As part of this framework, the identity and eligibility of all candidates are rigorously verified, including checks of official identity documents to prevent the engagement of underage or unauthorised personnel. Staff working hours and overtime practices are also regularly reviewed to ensure compliance with labour regulations and to mitigate any risk of coercive or exploitative conditions.

If any instance of child or forced labour is discovered, immediate corrective actions are taken, including the termination of the relevant staff, a review and enhancement of recruitment procedures, and targeted training for personnel involved in hiring to reinforce adherence to ethical labour standards. Through these measures, the Group ensures responsible employment practices and maintains a safe, fair and compliant workplace.

Diversity, Equity and Inclusion

We recognise that a diverse and inclusive workforce is fundamental to delivering resilient, innovative and sustainable data centre services. Accordingly, we continue to cultivate a working environment in which individuals from all backgrounds are respected, supported and empowered to realise their full potential. Our approach is grounded in the principle of equitable access to opportunities and the creation of a collaborative, high-performing culture.

The Group operates in full compliance with all applicable labour laws and regulations, including but not limited to the Sex Discrimination Ordinance (Cap. 480), the Disability Discrimination Ordinance (Cap. 487), the Family Status Discrimination Ordinance (Cap. 527), and the Race Discrimination Ordinance (Cap. 602). We maintain a zero-tolerance stance towards discrimination and harassment, supported by robust frameworks set out in our Recruitment Policy, Employment Policy, and Code of Conduct. These policies reinforce our expectation that all employees are treated with dignity and respect, irrespective of race, colour, religion, gender, national origin, marital status, age or disability. Our commitment to diversity, equity and inclusion is embedded in the way we operate day to day.

Redefining Tech: Advancing Gender Diversity in Operations

We recognise that diversity is a cornerstone of innovation and organisational resilience. Over the past year, the Group have been maintaining a well gender balanced level, particularly at senior levels. Women now hold 57% (FY2024/25: 63%) of our leadership and management positions, a testament to our commitment to inclusive leadership and merit-based advancement. Female leaders play a critical role in shaping our commercial strategy, with two senior executives driving key sales and business development initiatives that contribute directly to the Group's growth trajectory.

Beyond leadership, we actively expanding opportunities for women across all facets of the business, with a particular focus on technical operations. Women comprise 15% (FY2024/25: 15%) of our engineering and security teams, alongside 67% (FY2024/25: 65%) representation in non-technical roles. This progress underscores our commitment to fostering an inclusive environment where talent, skills, and expertise are valued equally, and where women are empowered to contribute fully to the Group's innovation and operational excellence.

While we acknowledge that there is more work to be done, these achievements mark meaningful progress towards a more balanced and inclusive workforce.

Female Representation - Performance

		Total Workforce FY2025/26	Total Workforce FY2024/25
Total (includes seconded employees)		500	525
Technical operation employees	Female	56 (15%)	63 (15%)
	Male	329 (85%)	348 (85%)
Non-technical employees	Female	77 (67%)	74 (65%)
	Male	38 (33%)	40 (35%)

Retaining Talent

SUNeVision remains committed to retaining talent by fostering a supportive and rewarding workplace that recognises and invests in its people. Central to this approach is a transparent, merit-based performance management framework, incorporating regular performance reviews to ensure fair evaluation, continuous feedback, and recognition of individual contributions. Career development is supported through clearly defined progression pathways and structured training programmes, with advancement opportunities closely aligned to the Group's remuneration structure, comprising a total rewards framework and comprehensive fringe benefits. This alignment ensures that employees' growth, performance, and contributions are directly reflected in their compensation and rewards, reinforcing motivation and accountability.

NURTURING PEOPLE

Wellbeing and engagement initiatives, complemented by clear bilateral communication channels, while integral, serve to support this broader framework by enhancing employee connection and overall job satisfaction. Collectively, these measures contribute to sustainable talent retention and organisational resilience.

Transparent, Merit-Based Performance Management Framework

The Group maintains a transparent and robust performance management framework designed to align individual contributions with organisational objectives. Annual performance appraisals and feedback processes are implemented for all permanent employees, incorporating structured performance reviews, goal setting, and periodic progress evaluations. These programmes support employee professional development by providing clear expectations, continuous feedback, and opportunities for improvement.

Annual performance reviews are further complemented by ongoing coaching and open dialogue throughout the year, fostering continuous improvement, enhancing employee engagement, and reinforcing a high-performance culture across the organisation.

The framework is governed by clearly defined guidelines and assessment criteria, ensuring consistency and objectivity across all levels of the organisation. Key performance indicators are established at the outset of each review cycle, providing employees with a clear understanding of expectations and measurable outcomes. The system also sets out structured pathways for both progression and, where necessary, performance improvement, with defined criteria guiding promotion and role adjustments. This comprehensive and transparent approach enhances accountability, builds trust in the evaluation process and ensures that decisions are made fairly and consistently.

This process enables the recognition of employee contributions, supports the development of individual growth plans and reinforces a high-performance culture across the organisation.

Delivering Competitive and Performance-Driven Rewards

We are committed to providing a fair, competitive and performance-driven remuneration framework. Compensation structures are regularly benchmarked against market standards to ensure competitiveness and equity. Employee remuneration is determined through a formal annual performance review process, with rewards linked to individual performance and contributions. We operate in full compliance with all applicable labour laws and regulations, including but not limited to the Employment Ordinance (Cap. 57), Employees' Compensation Ordinance (Cap. 282), the Mandatory Provident Fund Schemes Ordinance (Cap. 485), the Minimum Wage Ordinance (Cap. 608), ensuring fair and equitable employment practices across the operations.

The remuneration package offered by the Group applies to all employees across our operations, who have successfully completed their probation period and meet the relevant statutory requirements. It comprises base salary, performance-based bonuses and long-term incentives, complemented by a broad range of benefits. These include an enhanced Mandatory Provident Fund retirement scheme, medical and dental coverage, and diverse leave entitlements such as paid annual leave, full-paid sick leave, paid parental leave (including 14-week maternity and five-day paternity leave), birthday leave, study and examination leave, and family-related leave, including marriage and bereavement leave. Additional provisions, including overtime subsidies and study sponsorships, further support employees' financial and career development needs.

Beyond remuneration, the Group promotes a supportive and flexible working environment through initiatives such as a Casual Wear Policy, fostering a comfortable workplace culture. Practical support is also provided through complimentary staff shuttle bus services at various data centre sites, enabling shift duty employees to commute more conveniently and efficiently. Collectively, these measures form a holistic employee value proposition that enhances wellbeing, engagement and overall job satisfaction.

CASE STUDY

Building a One-Family Workplace that Cares for All

SUNeVision embraces a "one-family" culture, recognising that supporting employees' families is integral to enhancing overall wellbeing and fostering a sense of belonging. Comprehensive support for employees' families includes:

- **Medical and dental coverage** extended to eligible dependants, alongside preferential access to family health screening programmes.
- **Employee Assistance Programme** ("EAP") providing confidential counselling services through a 24-hour hotline, offering professional emotional and psychological support to employees and extending access to their family members.
- **Leave entitlements and thoughtful gestures** for life's important moments, including birthdays, marriage, the arrival of newborn children, and family bereavements.
- **Early leave arrangements** during key festive periods to encourage quality time with loved ones.
- **Scholarships and educational support** for employees' children to promote academic development and long-term opportunity. The "SHKP Group Undergraduate Scholarship Scheme", which provides financial assistance to eligible employees' children pursuing higher education.

Through these family-first initiatives, SUNeVision strengthens emotional connection and trust, creating a supportive environment where employees and their families feel cared for holistically. By promoting physical, emotional and financial wellbeing across different stages of life, the Group enhances employee wellbeing, engagement and long-term commitment to the organisation.

NURTURING PEOPLE

Multifaceted Open Communication Channels

We place strong emphasis on structured communication and active engagement to ensure that employees at all levels are informed, aligned and empowered to contribute to business success. A multi-channel communication approach is adopted, including annual performance reviews, annual employee satisfaction survey, full employee coverage staff intranet, parent company's group newsletters, social media (such as LinkedIn and wechat) posts, town hall sessions, senior management briefings, data centre site visits, focus group discussions, engagement activities, and formal feedback channels (including whistleblowing mechanisms and grievance policy). These mechanisms facilitate open dialogue, encourage the exchange of ideas, and provide employees with accessible avenues to share their perspectives.

In 2026, the annual employee satisfaction survey achieved a response rate of 97% (FY2024/25: 93%) and a satisfaction rate of 87% (FY2024/25: 85%), reflecting strong levels of engagement across the workforce.

Structured Grievance Handling Procedures

We maintain a formal and well-defined Grievance Policy, supported by robust internal reporting channels and established escalation procedures, enabling employees to report human resource-related grievances in a timely, confidential, and impartial manner. This mechanism ensures that all concerns, including those related to workplace conduct, employment practices, and employee relations, can be raised freely without fear of retaliation.

Employees may access multiple reporting channels, including email, telephone, and direct communication with line managers, with clearly defined escalation pathways to senior management and, where appropriate, designated oversight functions. All reported cases are documented, reviewed, and addressed by a dedicated leadership team in accordance with established procedures.

The Group is committed to handling all grievances with strict confidentiality, fairness, and transparency, with a target response timeframe of within 14 working days. This structured approach aligns with applicable ESG reporting requirements and reinforces a culture of accountability, ethical conduct, and effective risk management across the organisation.

Supporting Departing Employees and Succession Continuity

We adopt a supportive and transparent approach in managing employee transitions, ensuring that departing employees are treated with respect, openness and professionalism. Exit interviews are conducted to gather candid feedback, providing valuable insights to continuously enhance workforce practices, workplace culture and employee experience.

Knowledge transfer forms an integral part of the transition process, with structured arrangements in place to ensure that critical expertise and institutional knowledge are effectively shared with relevant teams. This transparent approach facilitates continuity while recognising the contributions of departing employees.

In parallel, a robust succession planning framework prepares key roles for transitions, safeguarding operational stability and sustaining a high-performance culture. Together, these practices reflect the Group's commitment to transparency, mutual respect and long-term organisational resilience.

Employee Engagement and Connection

Fostering a supportive and collaborative workplace culture remains a key priority for SUNeVision, underpinning our approach to employee engagement and organisational development. Through a range of ongoing engagement initiatives, we cultivate an inclusive and positive working environment that enhances employee morale, encourages cross-departmental collaboration and supports the Group's long-term success.

Regular social and recreational activities – including sports events, festive celebrations, staff gatherings and themed engagement sessions – provide opportunities for employees to connect beyond their day-to-day roles. The "Surprise Friday" initiative, for example, a monthly staff engagement activity featuring curated refreshments, continues to be well received, with participation rates exceeding 90%.

Each month, we pause from our daily routines to enjoy our Monthly Special Treats, featuring a selection of pastries, local favourites, snacks, and occasional team lunches. Beyond sharing food, these gatherings foster conversation, laughter, and mutual support, strengthening camaraderie across teams. Simple yet meaningful, these moments nurture a positive and inclusive workplace, reflecting the SUNeVision spirit and our commitment to valuing and connecting colleagues.

Building on the foundation of the Staff Club, SUNeVision further expanded its employee engagement programmes during the year to include employee-led activities, volunteer opportunities, and knowledge-sharing sessions covering a wide range of topics.

CASE STUDY

Bowling Night: Strengthening Team Connections

To promote employee engagement and strengthen workplace connections, the Staff Club organised a Bowling Night during the reporting period. The event brought together colleagues from across the organisation in a relaxed setting, fostering teamwork, camaraderie and cross-functional interaction through friendly competition. Such activities support employee well-being, strengthen team cohesion and contribute to an inclusive workplace culture.

NURTURING PEOPLE

CASE STUDY

Recognising Dedication and Fostering Camaraderie Through the Annual Dinner

The 2026 Annual Dinner brought colleagues together to celebrate the Group's shared achievements and recognise the dedication and contributions of its employees over the year. The event fostered a strong sense of camaraderie and collective pride, beginning with a dynamic drum performance by the leadership team that symbolised strength and commitment.

Engagement continued with the interactive SUNe Quiz Game, which encouraged colleagues to connect and showcase their knowledge of the company's milestones, while talented employees captivated the audience with inspiring singing performances. The evening was further energised by multiple rounds of a Lucky Draw, providing moments of excitement and celebration.

Seasonal celebrations and signature annual events, such as the Annual Dinner, continue to foster team cohesion and reinforce a strong sense of community and shared achievement across the organisation. In recognition of long-term dedication and contributions, the Group also presents Long Service Awards and Retirement Awards, highlighting the value placed on employees' commitment and sustaining a culture of appreciation and mutual respect.

CASE STUDY

Fostering a Cohesive and Happy Workplace through Experiential Engagement

We continue to promote a collaborative and engaging workplace through meaningful team-building initiatives that bring employees together across functions. During the reporting period, the Group organised a large-scale team-building event at an indoor sports complex, providing colleagues with an opportunity to connect in a dynamic environment that reflects our core values of wellness, technology and teamwork.

Beyond recreation, the initiative strengthened cross-departmental relationships and reinforced a shared sense of purpose and belonging.

Through sustained investment in employee engagement and wellbeing, SUNeVision has strengthened workforce morale and cohesion. These efforts have contributed to a 4% reduction in employee turnover during the year, demonstrating the effectiveness of the Group's approach in fostering a positive, inclusive and supportive workplace. By continuing to prioritise its people, SUNeVision aims to enhance long-term employee satisfaction and reinforce its position as an employer of choice.

Learning and Development

Talent development remains a central pillar of the Group's people strategy, supporting both organisational growth and individual career progression. We provide clearly defined career pathways, supported by a structured training framework that offers a wide range of leadership programmes and skills training, alongside learning and education sponsorship to enable employees to pursue professional qualifications.

This framework is underpinned by a robust training needs identification mechanism, informed by annual performance reviews and ongoing feedback, ensuring that learning initiatives are aligned with individual development needs and business priorities. These efforts are complemented by tailored development initiatives, including stretch assignments, job rotations, and participation in strategic projects, enabling employees to realise their full potential, align personal growth with organisational objectives, and contribute meaningfully to the Group's sustainable success.

Training Need Identification Mechanism

Annual performance reviews serve as a key mechanism for identifying high-potential employees and informing the development of tailored learning and development plans. Through a structured and transparent evaluation process, employees receive clear feedback on their performance, strengths, and areas for improvement, forming the basis for customised development plans developed in collaboration with Department Heads. This approach ensures that individual learning pathways are aligned with both career aspirations and organisational priorities, enabling accelerated career progression.

In parallel, a robust succession planning framework ensures that critical roles are supported by a pipeline of capable and well-prepared talent, reinforcing organisational resilience and long-term sustainability.

Learning and Education Sponsorship

We support lifelong learning through comprehensive learning and education sponsorship schemes. Employees are encouraged to pursue professional qualifications and further education aligned with their roles and career ambitions, with financial support provided upon successful completion.

Additional provisions, including study and examination leave, enable employees to balance professional responsibilities with personal development. Dedicated programmes, such as sponsored diploma courses for technician apprentices, combine structured learning with mentorship and practical experience, reinforcing the Group's commitment to developing a skilled and adaptable workforce.

Structured Training Framework

We promote a culture of continuous learning through a structured training framework spanning leadership development, technical capability building and personal effectiveness. Training is delivered through diverse formats, including workshops, seminars, webinars and digital learning platforms, enabling flexible and accessible participation.

NURTURING PEOPLE

Induction Training Programme

The Group recognises that a strong start is key to employee engagement and long-term success. Our induction training programme provides new employees with a comprehensive introduction to the Group's Vision, Mission, Values, operations, and sustainability commitments, ensuring they quickly understand their role within the organisation. Through structured sessions covering company policies, workplace health and safety, technical knowledge, and corporate culture, newcomers are equipped with the tools and insights needed to contribute effectively from day one. The programme also fosters early connections across teams, reinforcing collaboration and a sense of belonging while laying the foundation for continuous learning and career progression.

Job Specific / Industry Related Training

Job-specific and industry-focused training is designed to strengthen employees' capabilities across a wide range of areas, including market trends, client engagement, health and safety, sustainability, data analytics, digital marketing, e-commerce, customer service, and business ethics. This is supported by a comprehensive skills and knowledge development training framework, in which employees at all levels are encouraged to participate.

Leadership development programmes further enhance managerial and interpersonal capabilities, reflecting the extent of managerial and leadership development training across the organisation. These programmes cover areas such as presentation skills, performance management, personal effectiveness, as well as communication and negotiation.

In recognition of the growing importance of artificial intelligence ("AI") in driving digital transformation and operational innovation, we encourage employees to stay abreast of emerging technologies and evolving industry trends. During the reporting period, AI-related training programmes organised by the parent company were made available to employees, aiming to enhance digital literacy, foster innovation capabilities, and equip employees to adapt confidently to the rapidly evolving technology landscape, thereby supporting the Group's long-term competitiveness as a leading data centre operator.

Structured on-the-job training also supports technical staff in attaining professional certifications, including Registered Electrical Worker qualifications. Collectively, these initiatives equip employees with the knowledge, technical expertise, and leadership capabilities required to adapt to evolving industry demands, while supporting sustainable organisational growth and high-performance standards.

Compliance Training

Regular training on business ethics and regulatory compliance is provided to ensure that all employees remain informed of evolving legislative and industry requirements. Where appropriate, the Group collaborates with the Hong Kong Independent Commission Against Corruption ("ICAC") on anti-corruption training and updates relating to relevant legislation.

Building a Future-Ready Talent Pipeline

As part of our formal talent pipeline development strategy, which is explicitly aligned with the Group's long-term business objectives and workforce planning priorities, structured recruitment programmes — including graduate traineeships, internships, and apprenticeship initiatives — form a key component of this approach. These programmes enable the early identification and development of high-potential talent in line with the Group's evolving workforce needs.

– Parent company's Group Management Trainee Programme: Our parent company's Group Management Trainee Programme is designed to cultivate future leaders through a structured five-stage development pathway over a two-year period. This programme offers participants a clear, accelerated career trajectory towards senior management roles, including progression to Functional Director level. Trainees benefit from rotational assignments across key business functions, cross-departmental attachments, formal classroom training, and dedicated coaching, enabling them to develop both functional expertise and leadership capabilities.

– Graduate Engineer Programme: We support the professional development of early-career engineers through a structured two-year Graduate Engineer Programme under the Hong Kong Institution of Engineers ("HKIE") accredited Scheme "A" Training. The programme is designed to nurture graduates towards achieving Chartered Engineer status with full professional recognition from HKIE. It provides comprehensive exposure through a combination of on-the-job training and rotational assignments across key functions, including facility management, project management, and engineering design secondments. Participants develop a well-rounded skill set through both technical and soft skills training, gaining technical expertise, commercial awareness, and leadership capabilities through involvement in a diverse range of projects and case studies. The programme is further strengthened by a dedicated mentorship framework, whereby Graduate Engineers are guided by experienced Engineering Supervisors and Training Tutors, ensuring continuous learning, professional growth, and progression towards recognised professional qualifications.

– Work-study Degree-led Programme: Partnering with the Technological and Higher Education Institute of Hong Kong ("THEi") to establish a work-study degree programme in Building Services Engineering, providing a structured pathway for practical and academic development.

– Apprenticeship Programme: Collaborating with the Vocational Training Council ("VTC") to develop a comprehensive apprenticeship programme, offering hands-on training and practical experience to nurture future talent and strengthen professional competencies.

NURTURING PEOPLE

Health, Safety, and Wellbeing

The Group places the highest priority on protecting the health and safety of its workforce, ensuring full compliance with all applicable laws and regulations, including the Occupational Safety and Health Ordinance (Cap. 509 of the Laws of Hong Kong) and the Code of Practice on Safety Management issued by the Labour Department of the HKSAR Government.

Driving a Robust Safety Management System

While our operations are not inherently high-risk, we adopt a proactive and precautionary approach to occupational health and safety, underpinned by four key pillars: governance, monitoring and risk management, capacity building, and provision of Personal Protective Equipment. This pillar-based comprehensive approach has contributed to a record of zero work-related fatalities over the past three years, During the reporting period, the Group recorded 470 lost workdays due to work-related injuries, primarily attributable to the extended recovery period associated with two work injury cases.

Governance

Oversight is maintained through a structured governance framework. The Group level Site Health and Safety Committee regularly reviews safety performance at each site and provides actionable feedback to improve standards. A dedicated Health and Safety Manager ensures that internal controls are robust and that compliance with established policies and regulatory requirements is consistently met.

Central to our approach is the Corporate Health and Safety Policy at the Group level, which establishes clear responsibilities, management approaches and best practices to promote a strong safety culture across all operations. Recognising that health and safety should never be compromised, the Policy aims to provide a safe working environment and protect our employees, contractors, customers, visitors and data centre premises from occupational hazards.

The Policy sets out a structured approach to managing occupational health and safety risks, including the identification and assessment of workplace hazards, implementation of appropriate risk mitigation measures, compliance with applicable laws and regulations, and adoption of relevant industry practices. It also establishes requirements for workplace inspections, incident reporting and investigation, emergency preparedness, fire drills, first aid training and health and safety awareness programmes to promote safe working practices among employees.

The implementation of the Policy is overseen by the Executive Directors, with support from the Human Resources Department and Facility Management Department. Designated representatives at each data centre monitor safety performance, conduct regular reviews and follow up on improvement measures. Safety performance, incident management and compliance status are regularly monitored and reported, while the Policy is periodically reviewed with the support of the Internal Audit Department to ensure continued effectiveness and alignment with evolving regulatory requirements and operational needs.

At the site level, a set of general safety rules has been developed and implemented across all facilities, translating Group-level requirements into practical, day-to-day operational controls.

Monitoring and Risk Management

Risk management processes are fully integrated into day-to-day operations. At the site level, a comprehensive risk register is maintained and regularly updated to identify, assess, and mitigate potential hazards. Routine safety inspections are conducted across all sites, supported by clear operational protocols. For high-risk activities – such as confined space entry or hot works in data centres – a formal permit-to-work system is enforced to guarantee procedural compliance and effective risk control.

Capacity Building

All employees and contractors engaged in construction-related activities are required to complete mandatory Construction Industry Safety Training. In addition, role-specific training programmes – including industrial safety and first aid certification – are provided to ensure staff are appropriately equipped to manage workplace risks.

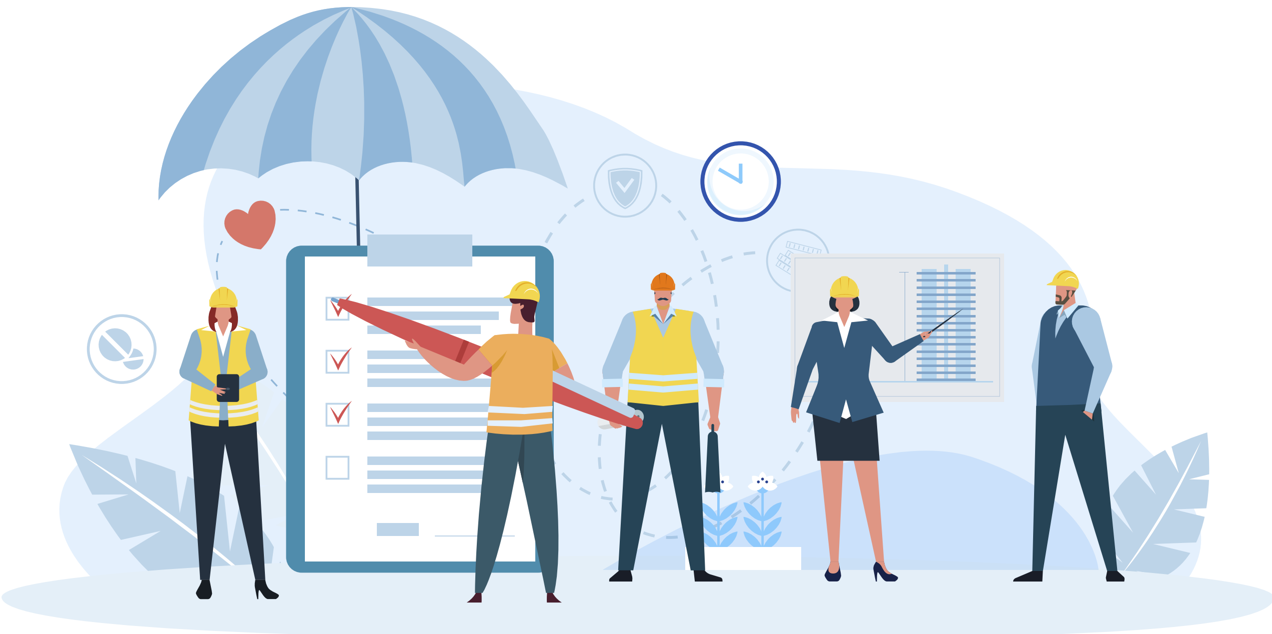
Targeted training initiatives further enhance safety awareness and technical competence, covering areas such as working at height, fire prevention, automated external defibrillator usage, unloading dock safety and permit-to-work systems. These programmes are designed to embed a culture of vigilance and accountability throughout the organisation.

CASE STUDY

Recognising Safety Excellence

During the reporting period, the Group continued its Safety Award Scheme to recognise employees who demonstrated exemplary commitment to occupational health and safety across our data centre facilities.

Award recipients consistently adhered to established safety procedures, actively supported the implementation of workplace safety measures and contributed constructive suggestions to further strengthen safety performance.



NURTURING PEOPLE

Provision of Personal Protective Equipment ("PPE")

PPE is provided to minimise exposure to workplace hazards, particularly in environments involving electrical systems and maintenance activities.

Appropriate PPE is deployed to protect personnel from electrical risks, including arc flashes, as well as from potential physical injuries. Key equipment includes arc-rated protective clothing, voltage-rated gloves, safety glasses or face shields, and safety footwear. In addition, bump caps are commonly utilised to provide effective head protection in operational environments.

Building Awareness of Health and Wellbeing

Employee wellbeing is safeguarded through a comprehensive Employment Policy, encompassing medical benefits, compassionate leave, flexible work arrangements during extreme weather conditions, and robust workplace health and safety provisions.

Health promotion remains a key focus, with initiatives including workshops under the Positive Health Series, complimentary health check-ups and seasonal influenza vaccinations, with comprehensive medical and dental coverage is provided as part of the remuneration package for employees.

CASE STUDY

Well-being Zone: Promoting a Healthy and Connected Workplace

The Group recognises that employee Health, Safety, and Wellbeing is integral to fostering a resilient, engaged and high-performing workplace. To further support a positive and balanced working environment, the Well-being Zone, a dedicated space designed to promote collaboration, wellness and social connection across the office community, was launched during the reporting period.

The thoughtfully curated space features a bicycle station, stretching and yoga area, as well as an interactive games hub, providing employees with opportunities to recharge, stay active and strengthen team connections throughout the working day.

Supporting Mental Health and Resilience

To further support mental health and resilience, the Group offers an Employee Assistance Programme ("EAP"), providing confidential counselling services via a 24-hour hotline for employees and their families. This initiative is designed to help individuals manage personal and professional challenges while maintaining a healthy work–life balance.

OPERATING SUSTAINABLY

Sustainability is integral to SUNeVision's approach to delivering resilient digital infrastructure and creating long-term value for stakeholders. As a leading data centre operator, the Group recognises the importance of managing its environmental impacts responsibly while supporting the continued growth of digital connectivity, cloud computing and emerging technologies.

Through its environmental management framework, the Group seeks to integrate sustainability considerations into its operations, infrastructure development and decision-making processes. Guided by its Environmental Policy and climate-related strategy, SUNeVision focuses on strengthening climate resilience, improving energy efficiency, managing resources responsibly and exploring opportunities to support the transition towards a lower-carbon economy.

This chapter outlines the Group's approach to addressing climate-related matters, managing energy consumption and carbon emissions, enhancing water and waste management practices, and adopting innovative solutions to improve operational efficiency. Through continual improvement, robust governance and responsible resource management, SUNeVision remains committed to operating its data centres in a reliable, resilient and environmentally responsible manner.

Material topics

Energy Management and Carbon Emission

Climate Mitigation and Resilience

Waste Management

Water Management

Green Finance

OPERATING SUSTAINABLY

CLIMATE MITIGATION AND RESILIENCE

Governance

The Group recognises that climate change presents evolving risks and opportunities for businesses, including the data centre industry. The Group recognises the importance of maintaining appropriate governance arrangements to oversee climate-related matters, support compliance with evolving regulatory requirements and enhance the long-term resilience of its operations.

Climate-related governance forms part of the Group's overall ESG governance framework as described in the "**Sustainability Governance**" section of this Report. The Board retains overall oversight of climate-related risks and opportunities, while the ESG Working Group supports the implementation of climate-related initiatives, monitors relevant climate-related developments and reports material climate-related matters to the Board where appropriate.

Managing Climate-related Matters

The Group's publicly accessible Environmental Policy establishes the overarching framework for managing environmental and climate-related matters across its operations.

The Group integrates climate-related considerations into its environmental management by:

– complying with applicable environmental laws and regulations;

– identifying, assessing and managing environmental impacts associated with its operations;

– promoting energy efficiency through environmentally responsible design, construction, operation and maintenance of data centres;

– conserving natural resources by adopting the principles of Reduce, Reuse, Recycle and Replace;

– reviewing environmental performance regularly and identifying opportunities for continual improvement;

– communicating environmental objectives and management strategies with stakeholders; and

– promoting environmental awareness among employees through education and engagement initiatives.

Climate-related matters identified by relevant business functions are coordinated through the Group's ESG governance framework and reported to the Corporate Governance Committee through ESG Working Group on a regular basis, where appropriate. This reporting mechanism enables the ESG Working Group and the Corporate Governance Committee to monitor the implementation of climate-related initiatives, review emerging climate-related developments and consider relevant regulatory changes when overseeing the Group's environmental management approach.

Supporting Climate Governance through International Standards

SUNeVision leverages internationally recognised environmental management systems and green building certification schemes to support its climate governance framework, strengthen environmental management practices and drive continual improvement across its data centre portfolio.

During the reporting period, MEGA IDC obtained ISO 14001:2015 certification, extending the application of certified Environmental Management Systems ("EMS") across the Group's major data centres, including MEGA-i, MEGA Plus, MEGA Two and MEGA Gateway. The ISO 14001-certified EMS provides a structured framework for identifying, assessing, managing and continually improving environmental aspects associated with the Group's operations, supporting effective environmental governance, regulatory compliance and continual performance improvement.

The Group also continues to strengthen the environmental performance of its facilities through internationally recognised green building certification schemes. These certifications demonstrate the Group's commitment to embedding sustainable design, resource efficiency and environmental stewardship into the planning, development and operation of its data centres, while reinforcing robust environmental governance and operational excellence.

Green building certifications	Certified portfolio
BEAM Plus Existing Buildings Version 2.0 Selective Scheme (Excellent)	MEGA-i, MEGA Plus, MEGA Two
LEED Gold certification for Building Design and Construction	MEGA Gateway, MEGA IDC
LEED Gold certification for Core and Shell Development	MEGA Plus

Through ongoing performance monitoring and the adoption of internationally recognised standards, SUNeVision continues to strengthen its governance over environmental and climate-related matters, enhance organisational accountability and promote continual improvement in environmental performance.

Strategy

Understanding Climate-related Risks and Opportunities

SUNeVision recognises that climate change presents evolving risks and opportunities that may influence the long-term development of the data centre industry. Accordingly, climate-related developments, including the increasing frequency and severity of extreme weather events, evolving climate-related regulations and growing customer expectations for sustainable digital infrastructure, may influence the Group's operational resilience, infrastructure planning and long-term competitiveness.

The Group recognises the importance of incorporating climate-related considerations into business planning and strategic decision-making where appropriate to support the sustainable development of its operations and maintain resilience against evolving climate-related developments.

Climate-related risks and opportunities are considered alongside the Group's broader business strategy, capital planning and operational planning. This enables management to better understand potential impacts on the Group's assets, operations and future development, while supporting informed decision-making over the short, medium and long term.

OPERATING SUSTAINABLY

Assessing Climate Resilience through Scenario Analysis

To better understand the potential implications of climate change on its operations, the Group periodically conducts and reviews climate scenario analysis to assess the resilience of its business strategy under different plausible climate futures.

The climate scenario analysis was developed with reference to publicly available climate projections, including datasets published by the World Resources Institute ("WRI") and the National Aeronautics and Space Administration ("NASA"), to assess the potential implications of different climate futures. The assessment encompassed the Group's principal operating assets in Hong Kong, including its data centres, subsea cable landing stations and cable network infrastructure.

During the reporting period, the Group reviewed its climate scenario analysis. Consistent with the approach adopted by its parent company, two climate scenarios (the Turquoise Scenario and the Brown Scenario) were selected to evaluate potential climate-related impacts over the short- to medium-term (2030) and the medium- to long-term (2050).

	Turquoise Scenario	Brown Scenario
Associated Models Referenced	– RCP 2.6 – SSP 1 IEA SDS – NGFS Orderly pathways	– RCP 8.5 – SSP 5 IEA STEPS – NGFS Hot house world pathways
Associated Temperature Rise	1.5℃ to 2℃ above pre-industrial levels by 2100	3℃ above pre-industrial levels by 2100
Economic Development	Inclusive growth respecting environmental boundaries	Fossil fuel-driven growth and technological advancement
Energy Transition	Swift shift from fossil fuels to renewable energy	Continued reliance on fossil fuels
Corporate Behaviour	Dedicated to lower-carbon operations and climate action objectives	Profit-centric model valuing financial gains over environmental or social impacts
Policy Implementation	Stringent climate policies with detailed short-term targets	Lack of short-term action plans due to institutional, political, or economic challenges
Physical Risk	Low	High (worsening extreme weather events)
Transition Risk	High (structural economic transition challenges)	Low

The climate scenarios presented do not represent forecasts or guaranteed outcomes for the Group. The scenario analysis is based on assumptions and information available at the time of the assessment, which are subject to uncertainties and may not materialise as anticipated. Actual outcomes may differ due to changes in external conditions, emerging information or other factors beyond the assumptions applied in the analysis. Accordingly, the scenario analysis should not be regarded as a prediction or guarantee of the Group's future performance or climate-related impacts.

The assessment examined the potential impacts of climate-related hazards, including flooding, sea level rise, typhoons and extreme heat, together with transition-related developments such as evolving climate policies and regulations, changing market expectations and reputational considerations. The results indicate that while the Group's operations remain resilient under the assessed scenarios, certain physical and transition risks may become more pronounced over the medium and long term. The findings support management in evaluating infrastructure resilience, informing strategic planning and prioritising appropriate adaptation and mitigation measures.

Integrating Climate Considerations into Business Strategy

The Group incorporates climate-related considerations into the planning, development and operation of its data centre portfolio where appropriate. Insights derived from climate assessments support management in evaluating infrastructure resilience, operational continuity and opportunities to enhance environmental performance over different time horizons.

Climate-related considerations are also taken into account, where relevant, during the planning of facility upgrades, energy management initiatives and investments in resilient infrastructure. The Group continues to strengthen both climate adaptation and mitigation measures to enhance operational resilience, support sustainable business growth and respond to evolving regulatory and market expectations.

The key climate-related risks and opportunities identified by the Group, together with their potential business implications, anticipated financial effects and strategic responses, are summarised below.

Climate-related matter	Time horizon	Potential business implications	Potential financial effects	Strategic response
Physical Risks				
(Acute risk) **Extreme weather events (e.g. typhoons and flooding)**	Short to medium term	Damage to critical infrastructure, operational disruption and reduced service continuity	May increase expenditure on infrastructure resilience, preventive maintenance, emergency preparedness and asset protection over time	Enhance infrastructure resilience through flood gates, emergency response plans and regular adverse weather drills
(Acute risk) **Extreme heat**	Short to medium term	Increased cooling demand and pressure on facility performance	May increase operating expenditure associated with cooling systems, maintenance and electricity consumption	Deploy resilient facility equipment capable of operating under elevated temperatures and maintain N+1 backup chiller configuration
(Chronic risk) **Rising average temperatures**	Medium to long term	Higher baseline cooling demand, reduced cooling efficiency and increased pressure on critical cooling infrastructure	May increase long-term electricity consumption, operating expenditure and capital investment in cooling infrastructure and equipment upgrades	Continual optimisation of cooling systems, energy-efficient technologies, preventative maintenance and enhancement of facility design to improve thermal resilience
Transition Risks				
Climate-related policy and regulatory developments	Short to medium term	Increasing compliance obligations and evolving climate-related disclosure requirements	May require additional expenditure on regulatory compliance, environmental management and sustainability initiatives	Monitor regulatory developments, strengthen environmental management practices and procure Renewable Energy Certificates where appropriate
Opportunities				
Changing market expectations for sustainable digital infrastructure	Medium to long term	Growing demand for environmentally responsible data centre services	May strengthen customer relationships, support business growth and enhance long-term competitiveness	Continue improving environmental performance, sustainable facility design and green building certifications
Resource efficiency and technological innovation	Medium to long term	Improved operational efficiency and more effective utilisation of resources	May reduce operating costs over time and improve long-term operational efficiency	Adopt innovative technologies and continually optimise energy and resource efficiency

OPERATING SUSTAINABLY

The anticipated financial effects presented above are qualitative in nature. The Group continues to enhance its climate-related assessment methodology and will further evaluate potential quantitative financial impacts as its climate-related data maturity and analytical capabilities continue to develop.

Supporting Long-term Business Resilience

The climate scenario analysis indicates that physical climate hazards, may become more pronounced under both assessed climate scenarios over the medium and long term. Certain assets, particularly those located in Tseung Kwan O, may experience comparatively higher flood exposure, while sea level rise may increase flood risks for the Group's subsea cable landing station at Chung Hom Kok.

To enhance resilience against these evolving climate-related challenges, the Group has implemented a range of adaptation measures, including flood protection infrastructure, emergency response procedures, adverse weather drills and redundancy for critical cooling systems. These initiatives strengthen the resilience of the Group's mission-critical facilities and support business continuity during increasingly frequent extreme weather events.

CASE STUDY

Preparing for Climate-Related Risks Through Operational Drills

During the reporting period, the Group conducted a comprehensive adverse weather drill across its data centre campus to enhance preparedness for extreme climate-related events. The exercise simulated a range of realistic scenarios, including typhoons, heavy rainfall, potential flooding and power disruptions, enabling teams to evaluate the robustness of existing response and mitigation measures. Key components of the drill included detailed risk assessments of weather-related hazards, the refinement of emergency communication and evacuation procedures, and the reinforcement of mitigation protocols designed to safeguard critical infrastructure and maintain uninterrupted operations. The initiative also included facility-level preparedness measures, such as strengthening entry points and flood prevention systems. Through regular testing and continuous improvement of our response capabilities, the Group seeks to ensure operational continuity for clients' mission-critical infrastructure while enhancing resilience to increasingly severe weather conditions associated with climate change.

At the same time, the transition towards a lower-carbon economy presents opportunities for the Group to improve operational efficiency, strengthen customer confidence and enhance the competitiveness of its sustainable data centre services. The Group will continue to monitor climate-related developments and periodically review its climate scenario analysis to ensure that its climate strategy remains responsive to evolving scientific knowledge, regulatory developments and business circumstances.

The outcomes of the climate scenario analysis support the Group's understanding of the resilience of its business strategy under different climate futures and inform strategic planning, infrastructure development and long-term investment considerations where appropriate. The processes for identifying, assessing and managing climate-related risks are described in the "**Climate Risk Management**" section of this Report, while climate-related performance is presented in the "**Metrics and Targets**" section.

Risk Management

The Group incorporates climate-related considerations, where appropriate, into its enterprise risk management ("ERM") framework to support the ongoing identification, assessment, monitoring and management of climate-related risks and opportunities. Although climate change was not identified as a principal enterprise risk during the reporting period, the Group recognises that evolving climate-related developments may influence its operations and business environment over time.

Climate-related risks and opportunities are identified through a combination of climate scenario analysis, enterprise risk assessments, operational reviews and ongoing monitoring of external developments, including changes in climate-related regulations, market trends, technological developments and stakeholder expectations. Relevant business functions collaborate to evaluate potential climate-related matters that may affect the Group's operations and long-term business resilience.

Identified climate-related risks are assessed using the Group's established risk assessment methodology, taking into account factors such as the likelihood of occurrence, potential business impacts, time horizons and the effectiveness of existing controls. Both physical and transition risks, together with climate-related opportunities, are considered as part of the assessment. Where appropriate, climate-related considerations are evaluated alongside other business risks to determine whether additional management attention or mitigation measures are required.

The Group periodically reviews its climate-related risk assessments to reflect changes in its operating environment, scientific knowledge and regulatory developments. Climate-related matters are reported through the Group's established ESG governance framework, enabling management and the Board to consider emerging climate-related developments as part of the Group's broader risk management and strategic planning processes.

The Group also considers insights from stakeholder engagement, periodic materiality assessments and the broader ESG risk assessment process when reviewing climate-related risks and opportunities. These inputs support the timely identification of emerging climate-related developments and enable the Group to periodically reassess whether changes in its operating environment, regulatory landscape or stakeholder expectations warrant additional management attention or enhancements to its climate-related risk management approach.

Metrics and targets

The Group has established a long-term ambition to achieve carbon neutrality by 2050, aligning with the carbon neutrality target of the Hong Kong Special Administrative Region Government. To support this ambition, the Group has established an Environmental Policy, which provide the overarching framework for improving environmental performance, enhancing energy efficiency, conserving natural resources and reducing the environmental impacts associated with its operations.

Measuring Climate-related Performance

The Group is committed to measuring, monitoring and transparently disclosing climate-related performance to support effective environmental management and informed decision-making. Recognising that the operation of data centres is energy intensive, the Group monitors key climate-related metrics to evaluate the effectiveness of its environmental initiatives, identify opportunities to improve operational efficiency and support the management of climate-related risks and opportunities.

OPERATING SUSTAINABLY

The Group's climate-related disclosures include information on energy consumption, greenhouse gas ("GHG") emissions and other operational performance indicators relevant to its business. These metrics support management in evaluating progress towards the Group's environmental objectives and identifying opportunities for continual improvement.

GHG emissions are measured and reported in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) and the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011) (collectively, the "GHG Protocol"), using the operational control approach prescribed by the GHG Protocol.

Emission factors and global warming potential ("GWP") factors are primarily referenced from publicly available government publications, information published by electricity suppliers and other recognised sources. GHG emissions are calculated using the GWP values set out in the Intergovernmental Panel on Climate Change ("IPCC") Sixth Assessment Report (AR6). Scope 1 and Scope 2 emissions are primarily quantified using an activity-based methodology based on fuel consumption records, utility bills and other operational data. During the reporting period, the Group further enhanced its climate-related disclosures by expanding the assessment of relevant Scope 3 GHG emissions, providing a more comprehensive understanding of emissions across its value chain.

Climate-related performance data is collected from operational records and is subject to internal review prior to annual disclosure to support the completeness, consistency and reliability of reported information.

Monitoring Climate-related Metrics and Targets

The Group monitors climate-related metrics that are relevant to the management of climate-related risks and opportunities associated with its operations. These metrics also support the evaluation of environmental performance and progress towards the Group's climate-related objectives, in which climate-related targets are reviewed periodically having regard to the Group's operational requirements, technological developments and evolving business circumstances.

Climate-related metric	Purpose	Climate-related target
Chiller efficiency (Coefficient of Performance ("COP"))	Monitor cooling system efficiency	Achieve an overall chiller COP of 5 or above by 2030, with all newly procured water-cooled chillers and air-cooled chillers designed to achieve a COP of above 6 and above 3, respectively
Power Usage Effectiveness ("PUE")	Monitor overall data centre energy efficiency	Improve designed PUE by 3% by 2030, compared with the 2025 baseline
Renewable electricity procurement	Support the transition towards lower-carbon electricity consumption	Utilising of renewable electricity through Renewable Energy Certificates ("RECs") in support of the Group's long-term clean energy transition
Scope 3 GHG emissions	Improve understanding of value chain emissions	Continue enhancing emissions measurement and management

The Group recognises that improving energy efficiency is one of the most effective means of reducing greenhouse gas emissions from data centre operations, where electricity consumption represents the primary source of operational carbon emissions. Accordingly, SUNeVision currently monitors and sets performance targets for key operational efficiency indicators, including PUE and the COP of its cooling systems. While these metrics are not direct measures of greenhouse gas emissions, they serve as important indicators of energy performance. Improvements in PUE reflect a greater proportion of electricity being utilised to power customers' IT equipment rather than supporting infrastructure, while higher COP values indicate more efficient cooling system performance. Together, these improvements contribute to lower electricity consumption and, consequently, reduced Scope 2 greenhouse gas emissions associated with purchased electricity.

Recognising the evolving expectations of stakeholders and the increasing importance of climate-related performance management, the Group will continue to strengthen its carbon management approach by enhancing emissions data quality, evaluating decarbonisation opportunities, and assessing the feasibility of establishing science-informed greenhouse gas emissions reduction targets that are appropriate to its operational profile and business environment. As the Group's climate strategy continues to mature, it will review and refine its targets to support long-term carbon reduction while maintaining the resilience and reliability of its mission-critical data centre infrastructure.

Advancing the Clean Energy Transition and Clean Technology Innovation

SUNeVision recognizes the importance of transitioning towards lower-carbon energy sources as part of global climate action. However, the Group operates within a unique environment in Hong Kong, where the adoption of renewable energy is constrained by geographical, infrastructural and market conditions. As a provider of high-density, carrier- and cloud-neutral data centres in a densely populated urban setting, the Group has limited opportunities to deploy large-scale on-site renewable energy systems due to space constraints and the stringent technical, operational and reliability requirements of mission-critical infrastructure. Furthermore, Hong Kong's hot and humid subtropical climate results in significant cooling demand, while the carbon intensity of purchased electricity remains dependent on the local electricity grid and its ongoing decarbonisation.

Despite these constraints, the Group remains committed to reducing its carbon footprint through practical measures within its operational control. These include improving energy efficiency through advanced monitoring and analytics, optimising cooling system performance, enhancing Power Usage Effectiveness ("PUE"), deploying appropriate low-carbon technologies and evaluating renewable energy solutions where technically, operationally and commercially feasible. The Group also continues to monitor developments in renewable electricity products, grid decarbonisation and emerging technologies to identify opportunities to further reduce its Scope 2 GHG emissions while maintaining the resilience, security and reliability of its data centre operations.

Recognising that purchased electricity represents the principal source of the Group's operational GHG emissions, SUNeVision continues to advance the transition towards cleaner energy sources and innovative technologies as part of its long-term decarbonisation strategy. Supporting the Group's ambition to achieve carbon neutrality and 100% clean energy by 2050, SUNeVision adopts a multi-faceted approach that combines renewable electricity procurement, on-site renewable energy generation, energy-efficient infrastructure, electrification and clean technology innovation to reduce the carbon footprint of its operations while strengthening the competitiveness of its data centre business.

OPERATING SUSTAINABLY

Investing in Clean Energy

Recognising that decarbonising electricity consumption is fundamental to achieving its long-term climate ambitions, the Group continues to expand the use of renewable energy and cleaner technologies across its operations. Renewable electricity procurement forms an integral component of the Group's broader decarbonisation strategy by complementing ongoing energy efficiency improvements and supporting the transition towards lower-carbon operations.

A key milestone during the reporting period was the implementation of a six-year agreement with CLP Power Hong Kong Limited ("CLP Power") to procure 100% site-specific Renewable Energy Certificates ("RECs") generated by the solar farm at the restored South East New Territories Landfill in Tseung Kwan O. Developed in collaboration with Green Valley Landfill Limited, this initiative represents Hong Kong's first privately funded landfill solar farm to provide site-specific renewable electricity attributes through RECs. During the reporting period, SUNeVision was honoured to receive the Renewable Energy Contribution Award at the CLP Smart Energy Award 2025, recognising the Group's continued efforts to integrate renewable energy into its data centre operations.

Together with the procurement of International Renewable Energy Certificates ("iRECs") and electricity generated by on-site solar photovoltaic panels installed at MEGA Plus, these initiatives contribute to reducing the carbon footprint associated with the Group's electricity consumption while supporting Hong Kong's transition towards a cleaner electricity system.

A total of 500,000 kWh of site-specific RECs were procured for the period from 1 July 2025 to 31 December 2025. In addition, 558,692 kWh of site-specific RECs for the period from 1 January 2026 to 30 June 2026 had been billed. Together, these purchases represent 1,058,692 kWh of renewable electricity and are estimated to reduce emissions by approximately 360 tonnes of carbon dioxide equivalent (tCO_2e), comparable to the annual carbon sequestration of around 15,650 trees. By directly linking renewable electricity generation with the Group's electricity consumption, this closed-loop framework enhances the transparency and credibility of the Group's renewable energy procurement while supporting the increasing demand for sustainable digital infrastructure driven by AI, cloud computing and digital transformation.

The Group also continues to diversify its renewable energy portfolio. Solar photovoltaic panels installed at MEGA Plus generated approximately 25,459 kWh of renewable electricity during the reporting period, while approximately 9,300 MWh of hydroelectric power, together with the corresponding iRECs, were procured to offset electricity consumption associated with the Group's general building operations. These initiatives support the Group's long-term objective of progressively increasing the proportion of clean energy used across its operations.

Investing in Clean Technologies

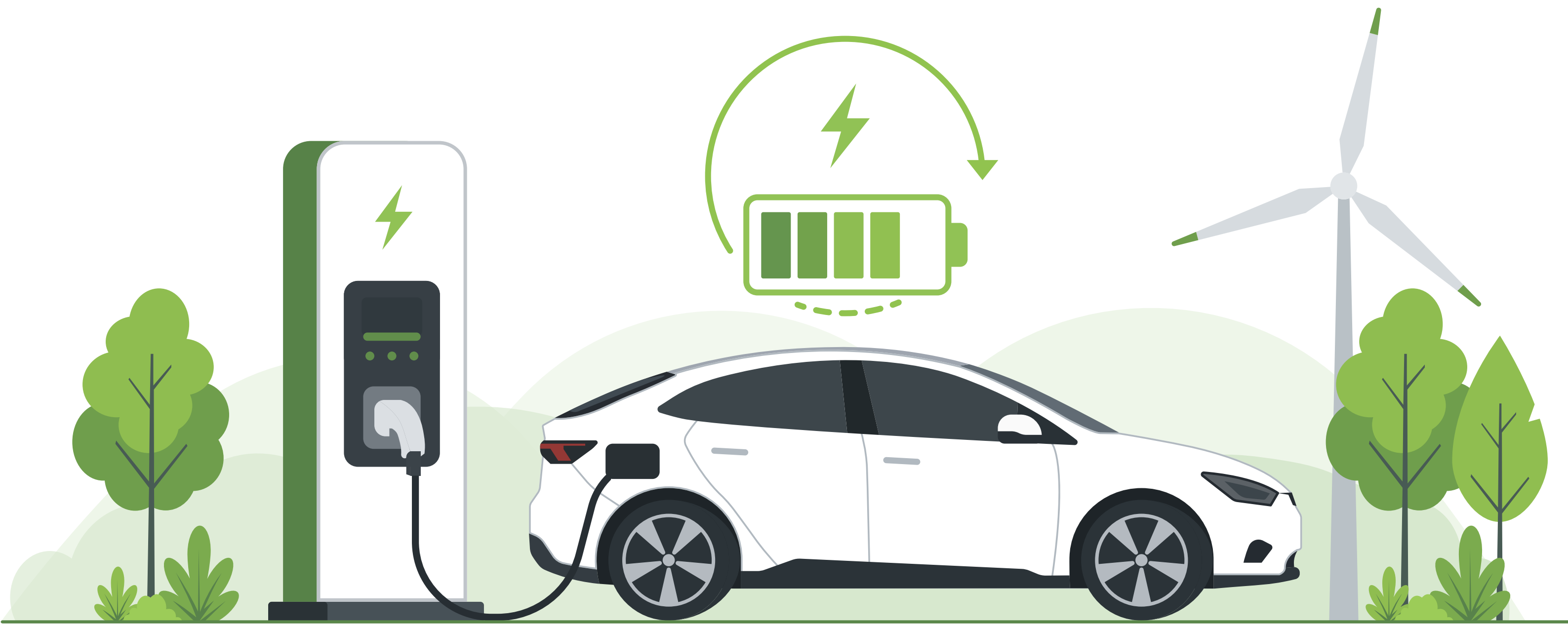
SUNeVision recognises the potential of clean technologies in enhancing operational efficiency, supporting resource optimisation and contributing to the long-term resilience of digital infrastructure. The Group continues to monitor developments in energy-efficient infrastructure, renewable energy solutions, advanced cooling technologies and other emerging technologies that may support more sustainable data centre operations.

To support Hong Kong's transition towards electric mobility, electric vehicle ("EV") charging facilities have been installed at MEGA Gateway and MEGA IDC.

The Group has also adopted lithium-ion battery technology in place of conventional valve-regulated lead-acid batteries for selected uninterruptible power supply ("UPS") systems. In addition to extending equipment lifespan and reducing maintenance requirements, lithium-ion batteries can improve energy efficiency by reducing power conversion losses and lowering lifecycle greenhouse gas emissions associated with battery replacement.

The Group will continue to assess the applicability of emerging clean technologies and sustainable solutions, taking into account technological maturity, operational requirements and business considerations, while maintaining the reliability and resilience of its data centre operations.

The Group believes that sustainability and innovation are increasingly becoming important drivers of customer demand and long-term value creation. By investing in renewable energy, clean technologies and innovative digital infrastructure, SUNeVision seeks to strengthen the environmental performance of its operations while enhancing the competitiveness of its products and services in a rapidly evolving digital economy.



OPERATING SUSTAINABLY

SUSTAINABLE FINANCE

As the first data centre provider in Hong Kong to secure Sustainability-Linked Loans ("SLLs"), the Group currently holds three facilities with a combined value of HK$9 billion, representing more than 65% of its total banking facilities. Structured in accordance with internationally recognised SLL Principles, these loans incorporate interest rate incentives tied to the achievement of predetermined ESG performance targets, including improvements in PUE, COP, and the attainment of green building certifications. Proceeds from the facilities support general corporate funding while reinforcing SUNeVision's commitment to advancing sustainable operations and long-term environmental performance.

During the reporting period, the Group made solid progress toward achieving these ESG-linked targets, further strengthening the integration of sustainability considerations into its financing framework and operational decision-making. These efforts were recognised at the Hong Kong Green and Sustainable Finance Awards 2025, where SUNeVision received the Outstanding Award for Green and Sustainable Loan Issuer (Data Centre Provider), reflecting the Group's dedication to accountability, transparency, and sustainable growth.

ENERGY MANAGEMENT AND CARBON EMISSION

Electricity consumption is the principal source of its operational GHG emissions. Amid growing demand for digital infrastructure driven by digitalisation, cloud computing and AI.

Guided by its Environmental Policy and Climate-related Strategy, the Group integrates energy efficiency considerations throughout the planning, design, construction, operation and continual enhancement of its data centre portfolio. Through the deployment of high-efficiency technologies, intelligent building management systems, renewable energy procurement and low-carbon engineering solutions, the Group seeks to improve environmental performance while delivering reliable and resilient digital infrastructure.

The Group regularly monitors energy consumption and key performance indicators across its data centre portfolio to identify optimisation opportunities, evaluate the effectiveness of energy efficiency initiatives and support continual improvement. Recognising that business growth and customer onboarding may increase absolute electricity consumption and GHG emissions, the Group places particular emphasis on improving operational efficiency and reducing emissions intensity. In addition to monitoring energy consumption and GHG emissions, the Group tracks Carbon Usage Effectiveness ("CUE") to assess carbon efficiency relative to customer IT electricity consumption and support informed operational decision-making.

		FY25/26	FY24/25	FY23/24
Total Energy Consumption	kWh	620,523,707	568,965,017	492,949,283
Total scope 1 and scope 2 GHG Emission	tCO_2e	232,661	233,473	216,095
Carbon Usage Effectiveness	kg CO_2e/IT kWh	0.602	0.663	0.696

During the reporting period, the Group's total electricity consumption intensity per revenue was 174.86 kWh per HK$ thousand (FY2024/25: 174.08 kWh per HK$ thousand), while total energy consumption intensity per revenue was 175.29 kWh per HK$ thousand (FY2024/25: 174.64 kWh per HK$ thousand). Adjusted revenue is used as the denominator for these intensity metrics to better reflect the scale of our power-related operations, and comprises all recurring data centre service revenue together with power-related cost recoveries.

Scope 3 GHG Emissions

Scope 3 GHG emissions comprise indirect emissions generated across the Group's value chain, excluding Scope 1 and Scope 2 emissions. For the Group's data centre operations, these emissions primarily arise from upstream procurement, capital investments, fuel- and energy-related activities and downstream leased assets.

During the reporting period, the Group assessed the applicability and significance of the Scope 3 emission categories with reference to the GHG Protocol, its operational profile, industry practices and data availability. Based on this assessment, the Group identified Category 1: Purchased Goods and Services, Category 2: Capital Goods, and Category 3: Fuel- and Energy-related Activities, as the relatively material categories.

OPERATING SUSTAINABLY

The Group has commenced the quantification of emissions from these material categories using available procurement, capital expenditure, energy consumption and operational data. Where primary data was unavailable, recognised estimation methodologies and third-party emission factors were applied. During the reporting period, the Group disclosed emissions for **Category 3: Fuel- and Energy-related Activities** as an initial step towards strengthening its Scope 3 GHG inventory.

Scope 3 category	Methodology	Emissions (tCO_2e)
Category 3 **Fuel- and energy-related activities** Upstream emissions from purchased fuel and electricity not covered under Scope 1 or Scope 2	Estimated based on energy consumption data and applicable upstream emission factors	110,733

Recognising that Scope 3 reporting is an evolving process, the Group will continue to enhance its data management processes, estimation methodologies and internal review mechanisms, while periodically reviewing the relevance of other Scope 3 categories in line with changes to its business activities, value chain, data availability and reporting requirements. The Group will also continue to engage with suppliers and business partners to support more robust emissions data collection and improve the completeness and transparency of its Scope 3 disclosures over time.

Improving Energy Efficiency

The Group continually invests in energy-efficient technologies and engineering innovations to optimise the environmental performance of its data centres while maintaining the high levels of reliability, resilience and operational availability expected of mission-critical digital infrastructure.

Optimising Cooling Performance

The Group continues to enhance cooling efficiency through advanced engineering design, intelligent operational controls and the deployment of high-efficiency cooling technologies.

High-efficiency water-cooled chiller systems operate at MEGA IDC and MEGA Gateway, contributing to lower electricity consumption for cooling.

MEGA IDC incorporates a high chilled water supply temperature chiller system together with an innovative catcher design, enabling chillers to operate at higher efficiency while maintaining system redundancy. At MEGA Gateway, chillers of different capacities are deployed according to operational loading requirements, allowing cooling capacity to be matched more efficiently with demand and reducing unnecessary electricity consumption during periods of lower utilisation.

To further optimise operational performance, automatic temperature control systems have been implemented at MEGA IDC, MEGA Gateway and MEGA Plus, while scheduled operation of fan coil units and variable refrigerant volume systems is employed where appropriate. Equipment room temperatures are continuously monitored and controlled to prevent overcooling while maintaining optimal operating conditions for critical infrastructure.

Water Leak Detection Systems have also been deployed across major data centres to promptly identify potential water leakage associated with chilled water systems. By enabling timely maintenance and reducing operational disruption, these systems support the efficient operation of cooling infrastructure and contribute to improved overall energy performance.

The Group periodically evaluates emerging cooling technologies, intelligent control systems and equipment upgrades to identify further opportunities to improve cooling efficiency while maintaining the resilience and reliability required for mission-critical operations.

In addition, the Group specifies non-chlorofluorocarbon refrigerants across its facilities. MEGA IDC utilises HCFO-R1233ZD, an ultra-low global warming potential refrigerant that helps minimise direct greenhouse gas emissions associated with refrigeration systems.

Enhancing Building Energy Performance

Energy efficiency considerations are embedded throughout the design and operation of the Group's facilities.

Building Management Systems ("BMS") continuously monitor and optimise the operation of major building services equipment to improve energy performance across data centre operations. LED lighting has been installed throughout the Group's major facilities, while occupancy sensors automatically regulate lighting usage in selected locations to minimise unnecessary electricity consumption.

To reduce solar heat gain, green roofs and vertical greening have been incorporated into MEGA Plus, MEGA Gateway and MEGA IDC, helping to improve building thermal performance and reduce cooling demand.

The Group has also adopted iPaint, an innovative high solar-reflectance coating on generator enclosures, chiller condensers and selected rooftop installations. By reflecting solar radiation and reducing surface temperatures, the coating lowers heat absorption and contributes to reducing cooling energy demand.

Environmentally preferable construction materials with low volatile organic compound ("VOC") emissions continue to be specified for new developments and refurbishment projects where applicable, supporting healthier indoor environments while contributing to sustainable building practices.

Promoting Energy-efficient Operations

Employees are encouraged to switch off idle electrical equipment to minimise unnecessary electricity consumption, while digital collaboration tools, video conferencing and conference calls are promoted to reduce unnecessary business travel and the associated carbon emissions.

These operational initiatives complement the Group's infrastructure investments and reinforce a culture of responsible energy management throughout the organisation.

OPERATING SUSTAINABLY

As demand for digital infrastructure continues to increase, the Group will continue to evaluate emerging technologies, optimise engineering systems and strengthen energy management practices to improve operational efficiency while supporting sustainable business growth.

WATER MANAGEMENT

Water is a critical resource for the efficient operation of the Group's cooling infrastructure, which is fundamental to maintaining the availability, reliability and thermal performance of its data centres. Although the Group does not encounter any significant issues in sourcing water for its operations, it recognises that responsible water stewardship is an integral component of sustainable data centre operations and remains committed to improving water efficiency through effective management practices, technological innovation and continual operational improvement.

Guided by its Environmental Policy, the Group monitors water consumption regularly to identify abnormal usage patterns, improve operational efficiency and optimise cooling system performance while maintaining the reliability of its critical digital infrastructure.

Optimising Water Efficiency

The Group continues to implement a range of water conservation initiatives across its facilities to improve water use efficiency and reduce unnecessary water consumption. Automatic sensor-operated faucets have been installed at MEGA Plus, MEGA IDC and MEGA Gateway to minimise unnecessary water use in daily operations.

To optimise the use of alternative water resources, rainwater harvesting systems have been installed to collect and reuse rainwater for water-cooled chillers where practicable, reducing reliance on potable water resources.

Chemical dosing treatment is conducted before cooling tower water is discharged at MEGA Plus, MEGA Fanling, MEGA IDC and MEGA Gateway, ensuring discharged water complies with applicable environmental requirements.

The Group also operates comprehensive Water Leak Detection Systems across its facilities. Installed within data halls, electrical rooms and other areas containing chilled water pipework, these systems continuously monitor for potential leaks and transmit real-time alerts to the Building Management System ("BMS"), enabling prompt investigation and corrective action to minimise water loss, protect critical equipment and enhance operational reliability.

Furthermore, pressure-compensated drip irrigation systems have been installed at MEGA Gateway, MEGA Plus and MEGA IDC to improve irrigation efficiency while reducing water consumption associated with landscape maintenance.

Strengthening Water Stewardship

Recognising that cooling systems represent one of the principal operational uses of water, the Group continues to monitor water consumption and identify opportunities to improve water use efficiency through operational optimisation and the effective management of its cooling systems, where practicable.

As the Group expands its data centre portfolio, future operational requirements may increase overall water demand. The Group will continue to review its water performance, taking into account operational needs, technological developments and business growth, and will consider appropriate measures to enhance water efficiency where feasible. Through the ongoing monitoring of water consumption, the Group seeks to support the reliable operation of its critical digital infrastructure while managing its environmental impacts responsibly.

WASTE MANAGEMENT

The Group is committed to minimising waste generation and promoting the efficient use of resources throughout its operations. Guided by its Environmental Policy and the principles of Reduce, Reuse, Recycle and Replace ("4R"), SUNeVision seeks to minimise waste at source, maximise resource recovery and ensure that unavoidable waste is managed responsibly in accordance with applicable environmental legislation and recognised industry practices.

Recognising that data centre operations generate comparatively limited operational waste, the Group nevertheless adopts a proactive approach to waste management by integrating resource efficiency and circular economy principles into its day-to-day operations and extending responsible waste management practices throughout its facilities and supply chain. Waste generation and recycling performance are monitored periodically to identify opportunities for continual improvement and support the Group's long-term environmental objectives.

Reducing Waste at Source

The Group continues to promote resource efficiency by reducing waste generation through digitalisation and sustainable procurement practices. A paperless working environment has been progressively implemented across offices and data centres through electronic leave management systems, digital procurement processes and electronic documentation, reducing paper consumption while improving operational efficiency.

Where paper consumption remains necessary, the Group gives preference to paper products sourced from responsibly managed forests and recycled or controlled sources wherever practicable.

To facilitate waste segregation and improve resource recovery, three-colour recycling bins are provided across the majority of the Group's data centres. Authorised cleaning contractors are engaged to collect recyclable materials and support the proper segregation and recycling of waste streams.

The Group also seeks to extend the useful life of information technology equipment wherever practicable through equipment reuse initiatives. Where equipment has reached the end of its operational life and is no longer suitable for reuse, retired computers and electronic equipment are collected and processed by ALBA IWS through WEEE · PARK, Hong Kong's Waste Electrical and Electronic Equipment ("WEEE") treatment and recycling facility, for proper recycling and resource recovery. These initiatives support the transition towards a circular economy by extending product life cycles, reducing electronic waste and promoting the responsible management of end-of-life equipment.

OPERATING SUSTAINABLY

Managing Waste Responsibly

Where waste generation cannot be avoided, the Group ensures that hazardous and non-hazardous waste is handled, transported and disposed of in accordance with applicable legal and regulatory requirements.

Hazardous waste arising from the Group's operations, including spent fluorescent tubes and valve-regulated lead-acid ("VRLA") batteries associated with UPS systems, is collected and treated by licensed waste contractors to minimise potential environmental impacts.

As part of its continual improvement initiatives, the Group has progressively adopted lithium-ion battery technology across the majority of its data centres. Compared with conventional VRLA batteries, lithium-ion batteries generally contain fewer hazardous materials, offer improved recyclability and have longer operational lifecycles, thereby reducing the frequency of battery replacement and supporting lower lifecycle waste generation. This transition contributes to more efficient resource utilisation while reducing the environmental impacts associated with battery disposal.

The Group also communicates its expectations on responsible waste management to contractors undertaking construction, renovation and maintenance activities. Construction waste generated during these activities is required to be properly segregated and disposed of at designated facilities in accordance with applicable environmental requirements and contractual obligations.

Looking ahead, the Group will continue to strengthen waste reduction and recycling practices by monitoring waste generation trends, promoting resource recovery and identifying opportunities to minimise waste at source. The Group also intends to further enhance waste management performance by evaluating additional recycling initiatives and progressively developing medium- and long-term waste reduction objectives as part of its continual improvement process.

DELIVERING RESPONSIBLE SERVICES

As a leading provider of carrier- and cloud-neutral data centre services, SUNeVision recognises that responsible service delivery is fundamental to maintaining customer trust, supporting business continuity and creating long-term value for stakeholders. Against a backdrop of accelerating digital transformation, AI adoption and increasing cyber threats, customers rely on resilient, secure and high-performance digital infrastructure to support their mission-critical operations.

Guided by its commitment to operational excellence, the Group integrates service quality, technological innovation, cyber resilience and customer-centric management into its day-to-day operations. Through continuous investment in resilient infrastructure, advanced digital technologies, internationally recognised management systems and robust governance practices, the Group seeks to deliver reliable, secure and future-ready digital infrastructure while continuously enhancing customer experience and service performance.

During the reporting period, the Group continued to strengthen its performance across four material topics – service reliability and quality, technological innovation, cybersecurity and data privacy, and customer experience and customer feedback handling. These priorities enable SUNeVision to enhance operational resilience, safeguard critical information assets, foster innovation and maintain responsive customer engagement, reinforcing its position as a trusted digital infrastructure partner in Hong Kong and the Asia-Pacific region.

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Material topics

- Climate Mitigation and Resilience
- Technological Innovation
- Cybersecurity and Data Privacy
- Customer Experience and Complaint Handling

DELIVERING RESPONSIBLE SERVICES

SERVICE RELIABILITY AND QUALITY

Maintaining highly available and resilient digital infrastructure is fundamental to SUNeVision's commitment to delivering dependable data centre services. Given the mission-critical nature of customers' IT environments, service reliability risks are managed as part of the Group's operational resilience framework and assessed alongside infrastructure, physical security, cyber security and business continuity risks.

The Group adopts a proactive approach to operational resilience through resilient infrastructure design, preventive maintenance, continuous monitoring and layered engineering controls. Critical facility systems and operational performance are monitored by experienced technical teams, enabling early identification of potential issues, timely corrective actions and continuous enhancement of service reliability.

Infrastructure Reliability and Business Continuity

SUNeVision's data centres are designed with multiple layers of redundancy and resilience to support high availability and minimise the risk of service disruption.

To maintain high uptime availability for customers, the Group's data centres incorporate multiple redundant power supply systems supported by UPS systems and backup power generators. These resilient power arrangements provide continuous protection against unexpected power interruptions and support the uninterrupted operation of customers' critical infrastructure.

Network resilience is further supported through professionally managed firewall services designed to protect customers' mission-critical systems from unauthorised access and evolving cyber threats. Firewall appliances are deployed and continuously monitored to maintain operational effectiveness and support the confidentiality, integrity and availability of customers' digital environments.

These infrastructure protection measures complement the Group's broader cyber security framework and contribute to the secure and reliable delivery of data centre services.

Operational Monitoring and Support

Recognising customers' dependence on continuous access to critical infrastructure, the Group maintains comprehensive operational monitoring and support capabilities.

Through its 24-hour, seven-day Remote Hand Support service, experienced technicians, Integrated Operation Centre personnel and engineers provide hands-on assistance for critical data centre management activities. This enables customers to address operational requirements efficiently, supports timely resolution of technical matters and enhances the availability of customers' IT infrastructure.

The Group's technical teams continuously monitor critical facility systems and operational conditions. Insights from infrastructure monitoring, operational reviews and service incidents are used to strengthen preventive measures, improve responsiveness and enhance operational resilience.

Physical Protection and Fire Safety

Protecting customers' critical infrastructure requires comprehensive physical security and asset protection measures. The Group has implemented multiple layers of physical security controls across its data centre portfolio to prevent unauthorised access, safeguard critical assets and maintain operational continuity.

Key physical security measures include:

- Access control systems restricting entry to authorised personnel and escorted visitors through controlled access cards;
- Dedicated security guard houses at MEGA IDC, MEGA Plus, MEGA Two and MEGA-i to verify authorised personnel and technicians;
- 24-hour CCTV surveillance with digital recording across common areas, plant rooms and equipment rooms;
- Comprehensive visitor management procedures supported by properly maintained visit logs;
- Electric perimeter fencing systems at MEGA IDC and MEGA Plus;
- Dedicated worker reception areas at MEGA-i and MEGA Gateway to segregate authorised vendor access from visitor access; and
- Circle-lock mantraps installed at MEGA-i, MEGA IDC, MEGA Plus and MEGA Gateway to prevent tailgating and unauthorised entry.

To minimise operational risks associated with fire incidents, the Group's data centres are equipped with comprehensive fire detection, protection and suppression systems, including gas-based FM-200 and Novec 1230 fire suppression systems, together with double interlock pre-action sprinkler systems.

These engineered safety systems are designed to identify potential fire hazards at an early stage, enable effective response and reduce the likelihood of damage to critical equipment and disruption to customer services.

Continuous Enhancement of Service Reliability

Service reliability performance is regularly reviewed by management as part of the Group's operational risk management and business continuity framework. Through infrastructure monitoring, service performance reviews, incident analysis and customer feedback, the Group identifies opportunities to strengthen resilience and enhance service quality.

DELIVERING RESPONSIBLE SERVICES

TECHNOLOGICAL INNOVATION

Innovation is central to the Group's strategy for delivering resilient, efficient and future-ready digital infrastructure. As digitalisation and AI continue to transform the regional economy, SUNeVision invests in advanced technologies, connectivity infrastructure and innovation partnerships to strengthen operational resilience, enhance customer experience and support the development of sustainable digital infrastructure across the Asia-Pacific region.

The Group launched **TKO Connect** in 2023, a purpose-built undersea fibre cable system connecting its connectivity hub MEGA-i with MEGA Plus and MEGA IDC. Spanning approximately three kilometres between MEGA-i and MEGA Plus, the system provides high-capacity, ultra-low-latency connectivity and access to an ecosystem of more than 300 networks, carriers, cloud service providers and subsea cable partners. Its resilient dark fibre infrastructure enhances redundancy and supports secure, scalable and reliable cross-border data transmission, meeting growing demand for subsea connectivity among enterprises, hyperscalers and telecom operators. By integrating advanced connectivity infrastructure with energy-efficient data centre operations, the Group supports the delivery of resilient, resource-efficient and future-ready digital infrastructure, creating long-term value for customers while contributing to the sustainable development of Hong Kong's digital economy.

Fostering Innovation through Strategic Collaboration

In addition to strengthening its internal technology capabilities, SUNeVision leverages its Startup Programme as an external innovation platform to foster collaboration with emerging technology companies across strategic sectors, including AI, GreenTech and Smart City solutions.

Through the Startup Programme, the Group provides participating startups with SUNeVision Credits ("SeV Credits"), enabling access to data centre colocation, cloud services, cybersecurity solutions, AI-enabled technologies and other digital infrastructure resources to accelerate technology development, testing and commercialisation.

By fostering collaboration with technology innovators, research partners and startups, the Group enhances its ability to identify and adopt emerging technologies, strengthen its innovation capabilities and accelerate the development of next-generation digital infrastructure.

CYBER SECURITY AND DATA PRIVACY

Cyber security and data privacy remain among SUNeVision's key sustainability and business resilience priorities, reflecting the critical role of digital infrastructure and the increasing sophistication of cyber threats globally.

The Group recognises that maintaining confidentiality, integrity and availability of information assets is essential to protecting customers' operations, safeguarding stakeholder trust and supporting long-term business resilience.

The Board maintains oversight of cyber security through regular reporting on the Group's cyber risk profile, emerging threats, key mitigation initiatives and significant cyber security incidents, where applicable. Cyber security and data privacy risks form part of the Group's enterprise risk management framework and are assessed alongside other principal business risks to ensure appropriate governance attention, resource allocation and continual improvement of mitigation measures.

Recognising that cyber resilience extends beyond regulatory compliance, the Group adopts a defence-in-depth approach integrating governance, technology, people and operational processes throughout the cyber risk lifecycle. The Group's cyber security management framework is structured around five core elements:

- Risk identification;
- Protection;
- Detection;
- Incident response; and
- Recovery.

Through internationally recognised standards, regular assurance activities, continuous monitoring and employee awareness initiatives, the Group remains committed to strengthening its resilience against evolving cyber threats.

Information Security Governance and Management Approach

The Group has established an Information Security Management System ("ISMS") aligned with internationally recognised best practices.

During the reporting period, MEGA-i, MEGA Plus, MEGA Two, ONE, MEGA Fanling, MEGA Gateway and MEGA IDC continued to maintain ISO 27001 Information Security Management System certification, demonstrating the Group's commitment to systematic information security governance, structured risk management and continual improvement.

The Group regularly evaluates the effectiveness of its information security management practices and technical controls through:

- Annual ISO 27001 surveillance audits;
- Continuous vulnerability management activities;
- Independent external Red Team exercises; and
- Ongoing security monitoring.

Insights and findings from these assessments are used to strengthen security controls, address emerging risks and enhance overall cyber resilience.

To further enhance transparency and accountability, the Group maintains a publicly accessible Data Privacy and Security Policy applicable across all subsidiaries. The Policy sets out the Group's commitments to protecting personal data, preventing data leakage and maintaining robust information security practices.

The Policy is publicly available on the Group's corporate website and outlines:

- Data protection principles;
- Information security governance arrangements;
- Cyber security practices;
- Employee responsibilities; and
- Dedicated channels for privacy-related enquiries and requests.

DELIVERING RESPONSIBLE SERVICES

Cyber Security Risk Management and Operational Resilience

The Group employs a risk-based cyber security programme combining preventive, detective, responsive and recovery capabilities. Strategic partnerships with independent cyber security vendors support the deployment of advanced technologies and specialist expertise to strengthen the Group's ability to identify, mitigate and respond to sophisticated cyber threats.

Risk Identification and Assessment

The Group proactively identifies cyber risks through continuous vulnerability management covering the discovery, verification, remediation and testing of identified vulnerabilities using the latest technologies.

Regular vulnerability assessments enable the Group to identify weaknesses, implement remediation actions and validate the effectiveness of security improvements.

The Group also regularly engages external Red Team exercises to simulate sophisticated cyber attacks and evaluate the resilience of corporate networks and systems. These independent assessments provide insights into potential vulnerabilities and support proactive enhancement of cyber defence capabilities.

Protection of Infrastructure and Digital Assets

The Group adopts a layered defence approach to safeguard critical systems and digital assets by implementing multiple security controls across different access platforms.

Endpoint security measures include updated anti-virus, anti-spyware and Advanced Persistent Threat ("APT") prevention solutions. The cyber security team continuously monitors security events and provides timely incident management support.

To reduce the risk of information leakage and unauthorised disclosure, the Group implements Data Loss Prevention ("DLP") technologies, mobile application management solutions and industry-grade encryption across workstations and mobile devices to protect corporate emails, documents and collaboration platforms.

Threat Detection and Monitoring

The Group has adopted the National Institute of Standards and Technology ("NIST") Cybersecurity Framework, providing a structured approach to identifying, protecting against, detecting, responding to and recovering from cyber risks.

Threat detection capabilities are further enhanced through advanced monitoring technologies and intelligence platforms.

A specialised threat intelligence platform monitors potential leakage of confidential corporate information, including compromised credentials and company accounts appearing on illicit online marketplaces, enabling timely identification and mitigation of emerging risks.

The Group has also implemented Security Information and Event Management ("SIEM") technology to enhance real-time security monitoring, event correlation and threat detection. Referencing the MITRE ATT&CK framework, the solution improves visibility into emerging attack techniques and supports more effective investigation and incident response.

Incident Response and Preparedness

The Group maintains documented cyber security incident response procedures and communication protocols establishing clear escalation mechanisms, roles and responsibilities.

The incident response framework covers:

- Identification and assessment of potential cyber incidents;
- Containment and mitigation of threats;
- Investigation and root cause analysis;
- Recovery of affected systems and services; and
- Communication with relevant internal and external stakeholders, where appropriate.

Lessons learned from incidents and security events are incorporated into the continual enhancement of security controls, policies and operational resilience measures.

To strengthen organisational preparedness, cyber security awareness training was provided to employees during the reporting period, reinforcing cyber hygiene practices and enhancing employees' ability to identify and respond to evolving threats.

Business Continuity and Recovery

The Group continues to enhance cyber resilience through robust backup and recovery capabilities designed to minimise disruption arising from ransomware, cyber-attacks or other unforeseen events.

The Group has strengthened its backup infrastructure by encrypting secondary backup files stored on corporate servers. Cloud-based backup solutions have also been implemented to safeguard selected Microsoft 365 mailboxes and OneDrive data.

Critical on-premises data and digital assets are encrypted and securely stored on cloud platforms, providing additional resilience and supporting timely recovery of critical systems and information.

Data Privacy and Responsible Data Management

Protecting information assets, safeguarding personal data and maintaining the confidentiality, integrity and availability of information are fundamental to the Group's operations and the trust placed in it by customers and business partners. As a provider of carrier- and cloud-neutral data centre services, the Group recognises that robust data privacy and information security practices are essential to maintaining reliable digital infrastructure and supporting long-term business resilience.

The Group's publicly available Data Privacy and Security Policy establishes the overarching framework for managing data privacy, information security and the protection of personal data across the Group. The Policy affirms the Group's commitment to complying with applicable data protection laws and regulations, including the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong, and ensures that personal data is collected, used, stored, transferred, retained and disposed of responsibly, securely and only for legitimate business purposes.

The Policy sets out the Group's approach to protecting personal data through appropriate administrative, physical and technical safeguards. These include role-based access controls, secure handling and retention of personal data, recognised cybersecurity measures, encryption, secure data disposal procedures and physical security controls at the Group's ISO 27001-certified data centres, where access is restricted to authorised personnel and appropriate access records are maintained. Recognising that effective data protection depends on the awareness and conduct of its people, the Group also promotes a strong information security culture through regular data privacy and cybersecurity training for employees, with appropriate guidance provided to relevant contractors.

DELIVERING RESPONSIBLE SERVICES

The Group seeks to integrate privacy considerations into the design, implementation and enhancement of its digital platforms and information systems. Data protection principles, including data minimisation, encryption, access controls and secure data management practices, are embedded throughout the information lifecycle to support the application of privacy-by-design principles and reduce privacy risks before new systems or enhancements are introduced.

The Group obtains consent from registered users of the Company's website, customers and business partners before collecting personal information and does not collect personal data from third parties. Through Personal Information Collection Statements, individuals are informed of:

- the purposes of data collection;
- the intended use of personal information;
- the scope of transfer and disclosure arrangements; and
- their rights to access, correct and request deletion of personal data.

Access to personal data is restricted to authorised employees on a need-to-know basis. Personal data is retained only for as long as necessary to fulfil legitimate business purposes and applicable legal requirements and is securely disposed of in accordance with established retention and disposal procedures. The Group does not rent, sell or disclose personal data to third parties beyond the purposes specified in its Personal Information Collection Statements or as otherwise required by law.

During the reporting period, the Group recorded zero concluded legal cases relating to breaches of customer information handled by the Group or unauthorised access to customer-related data within its managed systems and services. The Group's customers remain responsible for the security and protection of data stored on their own equipment hosted within the Group's data centres.

SUPPLY CHAIN MANAGEMENT

The Group recognises that a responsible, resilient and sustainable supply chain is fundamental to delivering reliable mission-critical digital infrastructure and creating long-term value for stakeholders. Given the specialised nature of the data centre industry, the Group works closely with suppliers and contractors providing construction services, mechanical and electrical systems, cooling infrastructure, electrical equipment, information technology solutions and facility management services to support the safe, reliable and efficient operation of its facilities.

The Group is committed to integrating ESG considerations into its procurement activities, with the objective of promoting ethical business practices, managing supply chain risks and supporting sustainable development throughout its value chain.

Supply Chain Governance

Procurement activities are governed by the Group's Procurement Policy and Procedures, which establish a structured framework for supplier selection, tender evaluation, contract management and supplier performance monitoring. The Procurement Team oversees the implementation of the procurement framework, maintains the Group's approved supplier and contractor lists, and supports business units in conducting procurement activities in accordance with established policies and internal controls.

The Group expects all employees involved in procurement activities to conduct business with integrity, fairness and transparency, while complying with applicable laws, regulations and internal policies. The procurement framework also supports the implementation of the Group's Environmental Policy, Health and Safety Policy and Anti-corruption Policy by incorporating relevant environmental, occupational health and safety, and business integrity considerations into procurement and supplier management processes where appropriate.

Responsible Procurement

The Group seeks to incorporate sustainability considerations into procurement decisions wherever practicable. In addition to quality, technical capability, cost competitiveness and service reliability, suppliers are evaluated with reference to relevant environmental and social considerations appropriate to the nature of the goods or services procured.

The Group seeks to:

- promote the procurement of energy-efficient equipment and infrastructure for the design, construction and operation of its data centres;
- encourage the use of environmentally preferable materials and products where practicable;
- specify electrical equipment that complies with applicable industry standards and relevant environmental requirements;
- minimise the use of single-use disposable products by favouring reusable, recyclable or durable alternatives where operationally appropriate; and
- incorporate the principles of Reduce, Reuse, Recycle and Replace ("4R") into procurement and contractor management practices.

For major development and construction projects, environmental consultants are engaged where appropriate to review construction designs and materials to support compliance with applicable statutory, certification and environmental requirements.

Managing Supply Chain ESG Risks

The Group recognises that effective supplier management is essential to maintaining operational reliability while managing environmental and social risks across its value chain. As part of supplier selection and periodic performance reviews, the Group considers suppliers' performance in areas relevant to the goods or services provided, including compliance with applicable environmental legislation, occupational health and safety requirements, labour practices, business ethics and regulatory obligations, where appropriate.

The Procurement Team and Project Managers periodically review the performance of qualified suppliers and contractors, taking into account product and service quality, technical capability, delivery performance, responsiveness and compliance with contractual and procurement requirements. Environmental and social performance may also be considered where relevant. Suppliers that fail to meet the Group's standards may receive lower evaluation scores, which may be taken into account during future tender evaluations and procurement decisions.

Supporting Local Procurement

Where commercially and operationally appropriate, the Group seeks to procure goods and services from local suppliers to strengthen supply chain resilience, support the local economy and reduce transportation-related environmental impacts. During the reporting period, the Group engaged 426 suppliers, of which approximately 90% were located in Hong Kong.

Supply Chain Management **Number of suppliers by geographic location**		**FY25/26**	**FY24/25**
Hong Kong	no.	380	356
Other Regions	no.	46	2

DELIVERING RESPONSIBLE SERVICES

CUSTOMER EXPERIENCE AND CUSTOMER FEEDBACK HANDLING

SUNeVision recognises that understanding customers' evolving needs, responding effectively to feedback and maintaining transparent communication are essential to delivering service excellence and strengthening long-term customer relationships.

The Group is committed to providing reliable, responsive and customer-focused services through structured engagement mechanisms, effective feedback channels and continuous enhancement initiatives.

Customer Engagement and Feedback Mechanisms

The Group maintains regular communication channels with customers to understand operational requirements, service expectations and areas for enhancement.

Quarterly performance review meetings provide a structured platform for reviewing service performance, discussing operational matters, exchanging feedback and identifying improvement opportunities.

Feedback gathered through customer interactions, surveys and service engagements is systematically consolidated and reviewed by management to evaluate service effectiveness and inform improvement initiatives.

Customer Satisfaction Monitoring

SUNeVision understands that customers' engagement and feedback are important for our continuous improvement in service delivery. We also conducted an annual customer satisfaction survey during the reporting period to better capture the voices of our customers.

Customer feedback is actively reviewed to identify customer priorities, assess performance and implement appropriate improvement measures.

Complaint Handling Governance

SUNeVision has established a Complaint Handling Policy and supporting procedures to ensure customer concerns are managed consistently, fairly and effectively.

The complaint management framework establishes requirements for:

- Timely acknowledgement and investigation;
- Appropriate escalation and resolution;
- Effective communication throughout the complaint process; and
- Corrective and preventive actions to address root causes.

All customer concerns are handled promptly by trained personnel and supported by 24-hour, seven-day customer support services.

During the reporting period, seven confirmed cases relating to communication and data centre services were identified. All confirmed cases were investigated and handled in accordance with established procedures, with appropriate follow-up actions implemented where necessary. All cases were resolved during the reporting period, resulting in a resolution rate of 100%, with no outstanding cases remaining at the end of the reporting period.

Certified Complaint Management Systems

At iAdvantage, the Complaints Handling Management System has maintained ISO 10002:2018 certification since 2018, covering IT service management systems supporting data centre services, managed services and connectivity services across key facilities.

The certification is subject to surveillance audits to independently assess continued compliance. During the reporting period, certification coverage included ONE-iAdvantage, MEGA GATEWAY, MEGA TWO, MEGA PLUS, MEGA-iAdvantage, MEGA IDC and MEGA Fanling.

At Super e-Technology, customer complaints are managed in accordance with the ISO 9001 Quality Procedure Manual and Quality Manual, ensuring a structured and quality-focused complaint management approach.

Continuous Improvement

Complaint trends, service quality indicators and customer feedback are regularly reviewed by management to identify recurring issues and determine appropriate corrective and preventive actions.

Through structured customer engagement, internationally recognised management systems and continual improvement practices, SUNeVision remains committed to delivering secure, reliable and high-quality services while fostering long-term customer trust and satisfaction.

Delivering Trusted and Resilient Digital Infrastructure

SUNeVision's commitment to responsible service delivery is underpinned by an integrated approach combining operational resilience, cyber security, data protection and customer stewardship.

Through resilient infrastructure design, robust risk management practices, internationally recognised security and quality standards, and structured stakeholder engagement, the Group continues to strengthen its ability to provide trusted digital infrastructure solutions.

As technology and customer expectations continue to evolve, SUNeVision remains committed to enhancing its governance, operational capabilities and service excellence to support customers' digital transformation journeys and create sustainable long-term value for stakeholders.

ENABLING ETHICAL GOVERNANCE

The Group is committed to maintaining the highest standards of corporate governance, ethical business conduct and responsible supply chain management. Guided by a robust governance framework, the Group seeks to uphold transparency, accountability and integrity across its operations and value chain while safeguarding the interests of its stakeholders.

The Board retains overall responsibility for the Group's governance, risk management and internal control systems, including oversight of ethical business conduct, anti-corruption measures, supply chain governance and sustainability-related risks. Through delegated committees and management functions, the Board regularly reviews the effectiveness of the Group's policies, procedures and internal controls to ensure compliance with applicable laws, regulations and corporate governance requirements.

MATERIAL TOPICS

- Business Ethics and Anti-Corruption
- Risk Management
- Supply Chain Management

BUSINESS ETHICS AND ANTI-CORRUPTION

The Group adopts a zero-tolerance approach towards bribery, corruption, fraud, extortion, money laundering and all other forms of unethical business conduct.

Anti-corruption Governance Framework

The Group's anti-corruption management framework is supported by a suite of policies, procedures and internal controls designed to prevent, detect and respond to bribery, corruption, fraud, money laundering and other forms of unethical conduct. Key elements of the framework include the Code of Conduct, Procurement Policy and Procedures, Whistle-blowing Policy, conflict-of-interest declaration requirements, internal audit reviews, employee training programmes and compliance monitoring mechanisms.

These policies and controls apply to all employees and Directors and, where relevant, extend to suppliers, contractors and other business partners. The framework establishes standards of ethical behaviour, prohibits bribery and improper advantages, requires the declaration and management of conflicts of interest, promotes transparent procurement practices and provides confidential channels for reporting suspected misconduct.

The Board, through the Corporate Governance Committee and senior management, oversees the implementation and effectiveness of the Group's anti-corruption framework and regularly reviews related policies, controls and procedures to ensure their continued effectiveness and alignment with applicable legal and regulatory requirements.

The SUNeVision Anti-corruption Framework

Component	Purpose
Governance and Oversight	Board oversight through the Corporate Governance Committee, with regular review of ethical conduct, anti-corruption matters and compliance.
Policies and Standards	Establish standards of ethical conduct through the Group's Code of Conduct, the parent company's Code of Conduct, and the Procurement Policy and Procedures, including requirements relating to anti-bribery, anti-corruption, anti-money laundering and responsible business conduct.
Conflict-of-interest Management	Manage actual, potential or perceived conflicts of interest through conflict-of-interest declaration requirements and related procedures.
Whistle-blowing and Investigation Mechanism	Enable confidential reporting and investigation of suspected misconduct through the Whistle-blowing Policy and established investigation procedures.
Training and Awareness	Promote awareness of ethical conduct, anti-corruption and anti-money laundering requirements through regular training for Directors, employees, suppliers and contractors.
Monitoring and Assurance	Monitor compliance and the effectiveness of anti-corruption controls through the risk management and internal control framework, Internal Audit Programme, procurement audits, compliance reviews and remediation processes.

ENABLING ETHICAL GOVERNANCE

Ethical Governance and Business Conduct

The Group is committed to conducting its business with integrity, transparency and accountability. The Group's Code of Conduct and Procurement Policy and Procedures establish clear expectations for employees, suppliers, contractors and other business partners to conduct business ethically and in compliance with all applicable laws and regulations.

The Code of Conduct of the Group's parent company further reinforces requirements relating to the prevention of bribery, corruption, money laundering and other unethical business practices. Employees are expected to uphold the highest standards of professional conduct and are required to comply with the Group's policies on ethical behaviour, regulatory compliance and responsible business practices.

The Group prohibits all forms of bribery, facilitation payments, kickbacks, fraud, extortion and money laundering, whether conducted directly or indirectly through third parties acting on its behalf. To support the early identification and resolution of actual or suspected misconduct, the Group has established a Whistle-blowing Policy that provides a formal mechanism for employees and external stakeholders, including customers, suppliers, contractors and other business partners, to raise concerns regarding malpractice or impropriety. The Group regularly reviews and enhances its anti-corruption framework, internal controls and compliance monitoring mechanisms to ensure continued adherence to applicable legal and regulatory requirements and to uphold the highest standards of ethical business conduct.

Internal Controls and Fraud Prevention

The Group recognises that effective internal controls play an important role in preventing corruption, fraud and other forms of misconduct. Through its risk management and internal control framework, the Group implements monitoring, audit and compliance review processes to safeguard the integrity of its operations and procurement activities. Further details of the Group's risk management and internal control systems are set out in the "**Risk Management**" section of this Report.

To uphold ethical business practices and prevent corruption and fraud, reviews of internal operations and system controls are conducted throughout the year on a risk-based basis. Internal audits cover major operational cycles and are performed according to a rolling audit plan, with key operational areas generally reviewed at least once every three years.

As part of the internal control process carried out by the Internal Audit function, procurement audits are conducted at least once every three years to evaluate compliance with the Procurement Policy and Procedures, promote transparency and fairness in tendering processes, and verify adherence to conflict-of-interest declaration requirements. These reviews support transparent procurement practices and strengthen oversight of supplier engagement activities.

The Procurement Team is responsible for monitoring procurement activities and reporting any instances of non-compliance to management for review and follow-up actions. These measures help maintain accountability, mitigate corruption risks and uphold the integrity of the Group's supply chain.

Whistle-blowing and Reporting Mechanisms

The Whistle-blowing Policy is publicly available on the Group's corporate website and encourages the reporting of concerns in good faith. Reportable matters include, but are not limited to, suspected breaches of laws or regulations, fraud, bribery, corruption, financial misconduct, unethical behaviour, violations of the Group's policies and codes of conduct, and other activities that may adversely affect the Group's operations, reputation or stakeholders.

The Group maintains dedicated reporting channels through which concerns may be raised confidentially. Employees are encouraged to report concerns through their management channels where appropriate, while employees and external stakeholders may also submit reports directly to designated management representatives responsible for overseeing whistle-blowing matters. Where considered appropriate, reports may be escalated to the Audit Committee for independent review.

All reports received are treated confidentially and handled in accordance with established investigation procedures. Upon receipt of a report, an appropriate person will be designated to assess and investigate the matter. Investigation findings and recommendations are reported to senior management and, where appropriate, the Audit Committee. Subject to the nature and complexity of the matter, whistle-blowers may be informed of the outcome of the investigation and any follow-up actions taken.

The Group is committed to protecting whistle-blowers from retaliation, discrimination, harassment or any other form of detrimental treatment arising from a report made in good faith. All disclosures are handled in a confidential and sensitive manner to protect the identity of whistle-blowers and the parties involved.

The Vice Chairman, Director of Human Resources, Head of Internal Audit and General Counsel/Company Secretary are responsible for overseeing the implementation and effectiveness of the whistle-blowing mechanism and receive regular updates on reported cases and corresponding management actions. The Group regularly reviews its whistle-blowing arrangements to ensure that concerns can be raised and investigated effectively, thereby fostering a culture of accountability, transparency and ethical business conduct.

Conflict of Interest Management

To further mitigate corruption risks, employees are prohibited from receiving any compensation, commission or benefit from suppliers, contractors or other business partners beyond the remuneration and benefits provided under their employment arrangements with the Group.

Employees are also prohibited from soliciting or accepting gifts, entertainment or other advantages that may influence, or appear to influence, their professional judgement and objectivity.

Employees are required to disclose any actual, potential or perceived conflicts of interest in accordance with the Group's conflict-of-interest declaration procedures, and appropriate mitigation measures are implemented where necessary.

Any employee found to have breached the Group's Code of Conduct, anti-corruption requirements or other ethical standards may be subject to disciplinary actions in accordance with the Group's established policies and procedures, including termination of employment where appropriate.

Ethical Standards Training

The Group recognises that continuous education and awareness are essential to fostering a strong culture of integrity and ethical conduct. The Group therefore implements an annual programme of anti-corruption training and awareness initiatives for Directors and employees, with appropriate activities also extended to key contractors and suppliers. These initiatives may include classroom or online training, circulation of regulatory and anti-corruption updates, email reminders, awareness materials on topics such as the handling of festival gifts and entertainment, as well as other communications to reinforce awareness of corruption risks and ethical business practices. Where appropriate, the Group engages ICAC to provide relevant training, guidance and updates.

To promote responsible business conduct across its value chain, the Group also provided anti-corruption training and awareness materials to its tier-one key contractors and suppliers during the reporting period. These initiatives included online seminars, distribution of training materials and guidance notes, and awareness questionnaires.

ENABLING ETHICAL GOVERNANCE

To further promote responsible business conduct throughout its value chain, the Group provided anti-corruption training to its tier-one key contractors and suppliers through online seminar, distribution of training materials, guidance notes and awareness questionnaires during the reporting period. Through these initiatives, the Group seeks to strengthen stakeholders' understanding of ethical business practices and reinforce its commitment to maintaining a transparent, accountable and corruption-free operating environment.

Compliance Performance

During the reporting period, the Group complied with relevant laws and regulations that have a significant impact on its operations relating to bribery, extortion, fraud and money laundering, including, but not limited to, the Prevention of Bribery Ordinance (Cap. 201), the Anti-Money Laundering and Counter-Terrorist Financing Ordinance (Cap. 615), and other applicable laws and regulations in the jurisdictions where the Group operates.

The Group was not aware of any material non-compliance with such laws and regulations during the reporting period. Furthermore, there were no concluded legal cases regarding corrupt practices brought against the Group or its employees during the reporting period, and no confirmed incidents of corruption were identified within the Group.

RISK MANAGEMENT

The Group recognises that effective risk management is essential to safeguarding its assets, protecting shareholders' interests and supporting sustainable business growth. The Board has overall responsibility for maintaining sound and effective risk management and internal control systems, which encompass financial, operational, compliance and sustainability-related controls. The Board also oversees the integrity of the Group's accounting and financial reporting systems, reviews the effectiveness of risk management and internal control processes, monitors corporate governance and compliance practices, and evaluates the Group's approach to ESG matters, including climate-related risks and opportunities.

To support effective oversight, the Board is assisted by the Audit Committee, the Risk Management Taskforce ("RMTF") and senior management in monitoring significant risks and ensuring that appropriate mitigation measures are implemented. While the Group's risk management and internal control systems are designed to identify and manage risks effectively, they provide reasonable rather than absolute assurance against material misstatement, loss or failure to achieve business objectives.

Enterprise Risk Management Framework

The Group adopts an Enterprise Risk Management ("ERM") framework with reference to the Committee of Sponsoring Organizations of the Treadway Commission ("COSO") framework. Through a top-down approach, risks are identified, assessed, prioritised, managed and monitored across all business units to support informed decision-making and long-term value creation.

The Group's Risk Management Policy establishes a structured process for identifying, assessing, mitigating, reporting and monitoring key risks, including strategic, operational, financial, compliance and ESG-related risks. Sustainability considerations are integrated into the overall risk management framework to ensure that ESG-related risks and opportunities are evaluated alongside other material business risks. Rather than being managed as standalone risk categories, social and governance considerations are embedded across the Group's enterprise risks where relevant. For example, matters relating to occupational health and safety, employee wellbeing, cybersecurity, data privacy, business ethics and regulatory compliance are assessed as integral components of the corresponding operational and compliance risks. Environmental and climate-related risks and opportunities are similarly considered within the Group's risk assessment processes where relevant to its operations and long-term business resilience.

At least annually, the RMTF conducts a comprehensive assessment of existing and emerging risks that may affect the Group's ability to achieve its strategic and sustainability objectives. Risks are evaluated based on their potential impact and likelihood of occurrence, taking into account changes in the operating environment, regulatory developments, market trends and stakeholder expectations. Appropriate risk owners are assigned to significant risks, and mitigation measures are developed and monitored accordingly.

Management of Material Risks

During the reporting period, the Group assessed a range of material risks and uncertainties that could affect its operational performance, financial resilience and long-term sustainable development.

As a leading data centre operator, the Group closely monitors risks associated with the timely development and availability of data centre capacity to meet evolving customer requirements and market demand. To address these risks, the Group maintains robust project planning processes, monitors key development milestones and collaborates closely with contractors and business partners to support timely project delivery.

The Group also evaluates geopolitical developments that may affect regional economic conditions, customer demand, international connectivity infrastructure and business operations. Mitigation measures include maintaining a diversified customer portfolio, monitoring market developments and regularly reviewing business strategies to enhance resilience.

In addition, the Group actively manages liquidity and financing risks associated with its ongoing investment and expansion plans. Climate-related risks and opportunities are assessed as part of the Group's broader risk management framework, while social and governance considerations are incorporated into the assessment of relevant enterprise risks. This integrated approach enables the Group to manage sustainability-related matters holistically, strengthen operational resilience and support long-term value creation.

Monitoring and Continuous Improvement

Risk management is embedded within the Group's day-to-day operations through a framework of policies, procedures and internal controls designed to promote accountability, transparency and effective risk oversight. Management regularly reviews risk exposures and the effectiveness of mitigation measures, with significant matters reported to the RMTF, Audit Committee and Board as appropriate.

The Group's Internal Audit function performs annual audits and independent reviews of the effectiveness of the Group's operations, risk management and internal control systems. Deficiencies identified in the design or implementation of controls are reported to management together with recommendations for improvement, and appropriate follow-up actions are undertaken to strengthen the control environment.

During the reporting period, the Board reviewed the effectiveness of the Group's risk management and internal control systems, including the management of ESG-related risks and opportunities. Based on the review conducted, the Board considered these systems to be effective and adequate, and no significant deficiencies were identified that would materially affect the Group's operations, sustainability performance or reporting processes.

The Internal Audit function also conducts risk-based reviews of the Group's major ethical standard, procurement practices, operational processes and business functions on a rotational basis. These include reviews of areas such as procurement policies and other key operational processes, with the scope determined based on the Group's risk profile. The reviews and audits cover all major operational cycles at least once every three years and assess the effectiveness of internal controls, compliance with internal policies and procedures, and adherence to applicable legal and regulatory requirements.

For further information on the Group's governance structure, risk management and internal control framework, principal risks and uncertainties, and the roles and responsibilities of the Board and its committees, please refer to the Corporate Governance Report and the Report of the Directors contained in the Group's Annual Report.

SUPPORTING COMMUNITIES

The "Supporting Communities" pillar reflects SUNeVision's commitment to creating sustainable value for society by integrating business success with positive social and environmental outcomes. Guided by its Community Investment Policy, the Group strategically deploys its expertise, resources and partnerships to support initiatives that address community needs, contribute to environmental stewardship and create lasting benefits for the communities in which it operates. Through volunteer programmes and community engagement initiatives, our employees actively contribute their time, professional expertise and skills to support local communities, strengthening social connections and fostering a shared sense of purpose.

4 QUALITY EDUCATION | 10 REDUCED INEQUALITIES | 11 SUSTAINABLE CITIES AND COMMUNITIES | 17 PARTNERSHIPS FOR THE GOALS

MATERIAL TOPICS

Community Engagement and Investment

Our community investment strategy focuses on four priority areas that align with both our business strengths and broader sustainability ambitions: advancing industry knowledge and thought leadership, promoting digital awareness and inclusion, nurturing the next generation of startups, and contributing to our community. Building on these priorities, SUNeVision leverages its expertise as a leading digital infrastructure provider to advance industry knowledge and thought leadership, bridge the digital talent gap, nurture innovation and entrepreneurship, and support environmental education and stewardship. By integrating community investment into our broader sustainability strategy, we seek to contribute to sustainable development, promote innovation and economic progress, and create long-term value for society. During the reporting period, our employees contributed over 160 volunteer service hours (FY2024/25: 140 hours) to community initiatives.

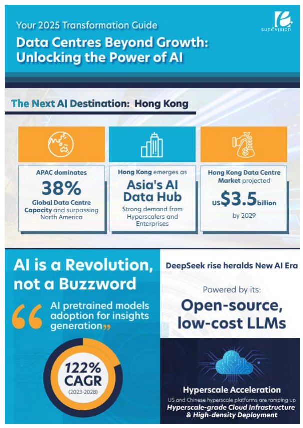
COMMUNITY INVESTMENT AND ENGAGEMENT

Advancing Industry Knowledge and Thought Leadership

SUNeVision is committed to supporting industry knowledge sharing and fostering informed dialogue on the future development of digital infrastructure. Through the sponsorship of independent research, publication of industry insights and active participation in industry forums, the Group seeks to facilitate knowledge exchange, promote market transparency and contribute to the sustainable development of Hong Kong's digital economy.

Publishing Market Trends and Industry Insights

Since 2022, the Group has sponsored the annual publication of *Data Centre Market Trends – Hong Kong: Asia's Connectivity Hub*, an independent research report prepared by a third-party industry research and consulting firm Structure Research. During the reporting period, the fourth edition of the report was released it highlights Hong Kong's strategic position as one of the region's leading connectivity hubs, supported by its extensive submarine cable network, advanced telecommunications infrastructure and role as a gateway connecting regional and international markets. The report also explores the implications of AI-driven workloads, interconnection requirements and future infrastructure needs on market growth and investment opportunities, providing stakeholders with valuable insights into the evolving digital infrastructure landscape.



The Group also publishes annual industry insights under its *Your Transformation Guide* series, which was launched in 2024 to help businesses navigate the rapidly evolving digital landscape. The 2025 edition examines the growing impact of AI and outlines how organisations must strategically adapt their infrastructure to capture the full value of AI-driven transformation.

SUPPORTING COMMUNITIES

Launching the AI Knowledge Hub Series

To support customers and industry stakeholders in navigating the rapidly evolving AI landscape, the Group launched the SUNeVision AI Knowledge Hub, a thought leadership series featuring expert interviews, executive briefings and educational content on AI adoption, infrastructure requirements and emerging technology trends.

Sharing Perspectives at the "Data Centre Leadership Dialogue"

During the reporting period, representatives of the Group participated in the *Data Centre Leadership Dialogue* hosted by CBRE Advisory. The event brought together industry leaders and market participants to discuss developments in the data centre sector and evolving customer requirements.

Contributing to Discussions at "Intelligent Computing Infrastructure Innovation Forum"

The Group was also invited to participate in the *Token Factory for Intelligent Future: 2026 Intelligent Computing Infrastructure Innovation Forum* held in Hangzhou, where industry experts, technology innovators and infrastructure providers gathered to discuss the future of intelligent computing.

Sharing Perspectives at the "20th China IDC Industry Annual Conference"

During the reporting period, the Group participated in the 20th China IDC Industry Annual Conference held in Beijing. Our representative contributed to discussions on the opportunities and challenges arising from the rapid growth of AI, exchanged views on infrastructure resilience, developments in Internet Exchange Points and investment strategies for digital infrastructure.

Through research sponsorships, industry publications and participation in professional forums, the Group provides stakeholders with continuous insights into market developments, technological trends and emerging opportunities. These initiatives support knowledge sharing, promote informed decision-making and contribute to the long-term development of Hong Kong's digital infrastructure ecosystem.

Promoting Digital Awareness and Inclusion

The Group recognises the growing importance of digital infrastructure in enabling connectivity, innovation and economic progress. Through the sponsorship of and participation in industry events, conferences and forums, the Group provides platforms for knowledge exchange and stakeholder engagement. These initiatives facilitate discussions on emerging technologies, digital transformation and infrastructure development, while fostering collaboration among market practitioners and supporting the sustainable growth of the digital economy.

Event	Organiser	Role and Sponsorship	Location
APRICOT 2026	Asia Pacific Network Operators Group (APNOG)	Exhibitor, Bronze Sponsor	Jakarta
CIS 2025 GCCM	Carrier Community	Participation	Almaty
Consensus Hong Kong 2026	CoinDesk	Participation	Hong Kong
HKNOG 14.0	Hong Kong Network Operators Group (HKNOG)	Exhibitor, Gold Sponsor	Hong Kong
Peering Asia 7.0	Philippine Network Operators Group (PhNOG), BBIX Inc., Digital Edge DC	Exhibitor, Platinum Sponsor	Manila
PTC'26 and SUNeVision-hosted Networking Event	Pacific Telecommunications Council	Participation	Honolulu
PhNOG 2025+ Week	The Philippine Network Operators Group	Exhibitor, Partner Sponsor	Manila
20th China IDC Industry Annual Ceremony	IDCC	Exhibitor, Gold Sponsor	Beijing
SGNOG12	Singapore Network Operators Group	Participation	Singapore
PTC'26	Pacific Telecommunications Council	Participation	Hawaii
Token Factory for Intelligent Future – 2026 Intelligent Computing Infrastructure Innovation Forum	Zhejiang University Institute of Computer Innovation, Zhejiang University Shanghai Advanced Research Institute	Speaking opportunity	Hangzhou

SUPPORTING COMMUNITIES

Nurturing the Next Generation of Startups

The Group is committed to supporting innovation, entrepreneurship and the development of Hong Kong's innovation and technology ecosystem. Through the annual SUNeVision Startup Programme, the Group provides emerging technology enterprises with access to industry expertise, digital infrastructure resources, mentorship and business networks to support their growth and innovation journey.

During the reporting period, the third edition of the programme was successfully completed, attracting close to 100 high-quality local start-ups. The programme continued its mission of empowering local entrepreneurs and innovators by providing opportunities to enhance technical capabilities, strengthen business models and accelerate market readiness. Participating start-ups represented a diverse range of technology sectors, including AI, smart city solutions, green technology, digital assets, education technology and immersive entertainment, reflecting the breadth and dynamism of Hong Kong's innovation ecosystem.

The programme recognised several outstanding start-ups whose solutions demonstrated strong innovation potential and practical applications. Award-winning enterprises included businesses specialising in maritime financial technology, AI-powered education, renewable energy generation and AI-enabled digital experiences.

Contributing to Our Community

The Group is committed to fostering resilient and inclusive communities through employee volunteering, charitable giving and community engagement initiatives. Guided by our community investment approach, we support programmes that address the needs of children, youth, the elderly and disadvantaged groups, while encouraging employees to contribute their time and skills to create positive social impact. The Staff Club plays an important role in mobilising employee participation and promoting a culture of volunteerism across the organisation.

Turning Every Marathon Mile into Positive Social Impact

During the reporting period, the Group participated in The Community Chest Sun Hung Kai Properties Corporate Challenge 2026, with employees taking part in both the Half Marathon and 10-kilometre race held at Sai Kung Country Park. The fundraising event brought together more than 1,000 participants from 63 organisations and raised over HK$6.89 million in support of charitable programmes serving individuals and families in need.

Supporting Communities Through Volunteer Action

The Group continued its partnership with Feeding Hong Kong through a volunteer initiative aimed at addressing food insecurity and reducing food waste. During the reporting period, employee volunteers assisted in sorting and packing surplus food, helping to prepare nutritious food parcels for distribution to individuals and families in need ahead of the Chinese New Year festive season.

Through volunteering, charitable fundraising and partnerships with community organisations, SUNeVision seeks to contribute to the well-being of local communities, promote social inclusion and support those facing social and economic challenges.

PERFORMANCE DATA SUMMARY

Environmental Performance			
	Unit	**FY2025/26**	**FY2024/25**
***Air Emissions*[1]**			
Nitrogen oxides	kg	5.16	–
Sulphur oxides	kg	0.10	–
Respirable suspended particles	kg	0.38	–
Greenhouse Gas (GHG) Emissions			
Direct GHG emissions (scope 1)	tCO_2e	4,958[2]	1,889
Indirect GHG emissions (scope 2) without applying international renewable energy certificates (iRECs) and RECs (Location-based method)	tCO_2e	231,541	236,347
Indirect GHG emissions (scope 2) with reduction through iRECs and RECs (Market-based method)	tCO_2e	227,702	231,573
Total GHG emissions (Market-based method)	tCO_2e	232,661	233,473
Indirect GHG emissions (scope 3) Category 3: Fuel- and energy-related activities	tCO_2e	110,733	–
Carbon Usage Effectiveness	kg CO_2e/IT kWh	0.602	0.663
***Energy Consumption*[3]**			
Total electricity consumption	kWh	618,990,380	567,143,624
Total diesel consumption[4]	kWh	1,533,327	1,821,392
Total energy consumption	kWh	620,523,707	568,965,017
Non-hazardous Waste			
Total non-hazardous waste generated	kg	171,835[5]	215,290
Total non-hazardous waste per revenue	kg/HK$ thousand	0.0551	0.0733

1 Air emissions continue to be assessed as non-material for the Group. Nonetheless, we have strengthened our disclosure practices and expanded the scope and granularity of air emission data reported in the current reporting period. Data for FY2024/25 are not available due to the enhancement of our data collection and reporting framework implemented thereafter.

2 Scope 1 emissions and hazardous waste increased in FY2025/26, mainly due to increased refrigerant refilling and replacement.

3 Electricity and energy consumption increased during FY2025/26 due to increased client information technology load.

4 Diesel consumption decreased in FY2025/26 as FY2024/25 included planned substation maintenance and project works that required extended generator use for load support and testing and commissioning.

5 The higher non-hazardous waste generated in FY2024/25 was attributable to renovation works and project activities during that period.

PERFORMANCE DATA SUMMARY

Environmental Performance			
	Unit	FY2025/26	FY2024/25
Hazardous Waste			
Hazardous waste produced (weight-based waste streams only)[6, 7]	kg	3,425[2]	928
Total hazardous waste recycled	%	100%	100%
Hazardous waste per revenue (weight-based waste streams only)	kg/HK$ thousand	0.067[6]	0
Water[8]			
Total water consumption	m^3	478,448	353,412
Total water consumption intensity per revenue	m^3/HK$ thousand	0.15	0.12

6 The hazardous waste figure presented in the table excludes batteries. Battery waste for FY2025/26 was 204,524 kg as compared to nil for FY2024/25. This increase in battery-related hazardous waste is primarily driven by our planned battery replacement cycle, under which a significant portion of installed batteries reached end-of-life and were replaced during the year.

7 Apart from the 3,425 kg of hazardous waste produced, our operations recorded three pieces of waste scrap equipment and parts during the reporting period, for which the weight is not available. We will strengthen our data collection mechanisms and strive to provide unified data for disclosure.

8 Water consumption increased in FY2025/26 mainly due to higher information technology load, which led to increased cooling demand and the operation of additional water-cooled chillers and cooling towers.

PERFORMANCE DATA SUMMARY

Social Performance			
	Unit	**FY2025/26**	**FY2024/25**
Employee Profile			
Total workforce (includes seconded employees)	no. of people	500	525
Total workforce by gender			
Technical Operation Employees			
Female	no. of people	56	63
% of female employee	%	15%	15%
Male	no. of people	329	348
% of male employee	%	85%	85%
Non-Technical Employees			
Female	no. of people	77	74
% of female employee	%	67%	65%
Male	no. of people	38	40
% of male employee	%	33%	35%
Total workforce by age group			
Under 30	no. of people	25	27
30–50	no. of people	310	323
Above 50	no. of people	165	175
Total workforce by employment type			
Full-time	no. of people	500	525
Part-time	no. of people	0	0
Total workforce by geographic region			
Hong Kong	no. of people	500	525
Employee Turnover			
Employee turnover rate	%	12%	16%
Employee turnover rate by gender[9]			
Female	%	11%	14%
Male	%	13%	17%
Employee turnover rate by age group[10]			
Under 30	%	20%	44%
30–50	%	11%	14%
Above 50	%	13%	15%

9 The turnover rate is calculated by dividing the number of female/male employees who left employment by the total number of female/male employees.

10 The turnover rate is calculated by dividing the number of employees under 30/30–50/above 50 who left employment by the total number of employees under 30/30–50/above 50.

PERFORMANCE DATA SUMMARY

Social Performance			
	Unit	FY2025/26	FY2024/25
Occupational Health and Safety			
No. of case of work injury	no. of case	7	4
Lost workdays due to work injury	days	470[11]	15
% of Lost workdays	%	0.35%[11]	0.01%
Development and Training[12]			
Total workforce trained	no. of people	488	490
Employees trained by employee category			
Executive	no. of people	19	20
% of executives trained	%	4%	4%
Manager	no. of people	116	116
% of managers trained	%	24%	24%
General Employee	no. of people	353	354
% of general employees trained	%	72%	72%
Employees trained by gender			
Female	no. of people	106	127
% of female employees trained	%	22%	26%
Male	no. of people	382	363
% of male employees trained	%	78%	74%
Average training hours per employee by employee category			
Executive	hours/employee	11.04	2.30
Manager	hours/employee	9.99	4.10
General Employees	hours/employee	7.68	7.30
Average training hours per employee by gender			
Female	hours/employee	7.18	5.80
Male	hours/employee	8.69	6.40

11 The increase in lost workdays during FY2025/26 was mainly due to longer recovery periods required for certain work-related injuries. The Group will continue to review and improve working conditions and standard operating procedures to minimize the likelihood and impact of future incidents.

12 Training metrics are calculated based on all employees trained, including those who subsequently left the organization.

ESG REPORTING CODE CONTENTS INDEX

PART B: MANDATORY DISCLOSURE REQUIREMENTS

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

Part C: "Comply or explain" Provisions

	Description	Reference and remarks
A. Environmental		
Aspect A1: Emissions		
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	Operating Sustainably During the reporting period, there were no confirmed incidents of non-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.
KPI A1.1	The types of emissions and respective emissions data	Operating Sustainably Performance Data Summary Given the nature of the Group's business operations, air pollutant emissions are not identified as a material ESG topic.
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	Operating Sustainably
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	Waste Management
Aspect A2: Use of Resources		
General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials	Operating Sustainably
KPI A2.1	Direct and/or indirect energy consumption by type in total (kWh in '000s) and intensity	Operating Sustainably 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	Operating Sustainably
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	Water Management The Group has not identified any issues in sourcing water that is fit for purpose.

ESG REPORTING CODE CONTENTS INDEX

	Description	Reference and remarks
KPI A2.5	Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced	Not applicable. The Group's business activities do not involve product manufacturing.
Aspect A3: The Environment and Natural Resources		
General Disclosure	Policies on minimising the issuer's significant impact on the environment and natural resources	Operating Sustainably
KPI A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them	Operating Sustainably
B. Social		
Aspect B1: Employment		
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 compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare	Nurturing People During the reporting period, there were no confirmed incidents of non-compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.
KPI B1.1	Total workforce by gender, employment type, age group and geographical region	Human capital management Performance Data Summary
KPI B1.2	Employee turnover rate by gender, age group and geographical region	Human capital management Performance Data Summary
Aspect B2: Health and Safety		
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 providing a safe working environment and protecting employees from occupational hazards	Health, safety, and wellbeing During the reporting period, there were no confirmed incidents of non-compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards.
KPI B2.1	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year	There were no work-related fatalities occurred in the past three years.
KPI B2.2	Lost days due to work injury	Health, safety, and wellbeing Performance Data Summary

ESG REPORTING CODE CONTENTS INDEX

	Description	Reference and remarks
KPI B2.3	Description of occupational health and safety measures adopted, how they are implemented and monitored	Health, safety, and wellbeing
Aspect B3: Development and Training		
General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities	Learning and development
KPI B3.1	The percentage of employees trained by gender and employee category	Learning and development Performance Data Summary
KPI B3.2	The average training hours completed per employee by gender and employee category	Learning and development Performance Data Summary
Aspect B4: Labour Standards		
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	Human capital management During the reporting period, there were no confirmed incidents of non-compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.
KPI B4.1	Description of measures to review employment practices to avoid child and forced labour	Human capital management
KPI B4.2	Description of steps taken to eliminate such practices when discovered	Human capital management
Aspect B5: Supply Chain Management		
General Disclosure	Policies on managing environmental and social risks of the supply chain	Supply chain management
KPI B5.1	Number of suppliers by geographical region	Supply chain management
KPI B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored	Supply chain management
KPI B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored	Supply chain management
KPI B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored	Supply chain management

ESG REPORTING CODE CONTENTS INDEX

	Description	Reference and remarks
Aspect B6: Product Responsibility		
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	Delivering Responsible Services During the reporting period, there were no incidents of non-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.
KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons	Not applicable. The Group's business activities do not involve product manufacturing.
KPI B6.2	Number of products and service related complaints received and how they are dealt with	Customer experience and complaint handling
KPI B6.3	Description of practices relating to observing and protecting intellectual property rights	The Group's operations are not reliant on the creation of intellectual property rights. However, the Group's Information Security Management System is audited yearly by external party, complying with the requirements of ISO/IEC 27001:2022, which ensures our customer's information, including intellectual property, is shielded against potential risks.
KPI B6.4	Description of quality assurance process and recall procedures	Service reliability and quality
KPI B6.5	Description of consumer data protection and privacy policies, and how they are implemented and monitored	Cybersecurity and data privacy

ESG REPORTING CODE CONTENTS INDEX

	Description	Reference and remarks
Aspect B7: Anti-corruption		
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	Business ethics and anticorruption During the reporting period, there were no incidents of non-compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering.
KPI B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees During the Year and the outcomes of the cases	Business ethics and anticorruption There was no legal case regarding corrupt practices concluded during the reporting period.
KPI B7.2	Description of preventive measures and whistleblowing procedures, and how they are implemented and monitored	Business ethics and anticorruption
KPI B7.3	Description of anti-corruption training provided to directors and staff	Business ethics and anticorruption
Aspect B8: Community Investment		
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	Supporting Communities
KPI B8.1	Focus areas of contribution	Supporting Communities
KPI B8.2	Resources contributed to the focus area	Supporting Communities

ESG REPORTING CODE CONTENTS INDEX

PART D: CLIMATE-RELATED DISCLOSURES

Reference Paragraph	Description	Reference and remarks
Governance		
19 IFRS S2 para. 6	An issuer shall disclose information about: (a) the governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) responsible for oversight of climate-related risks and opportunities. Specifically, the issuer shall identify that body(s) or individual(s) and disclose information about: (i) how the body(s) or individual(s) determines whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to climate-related risks and opportunities; (ii) how and how often the body(s) or individual(s) is informed about climate-related risks and opportunities; (iii) how the body(s) or individual(s) takes into account climate-related risks and opportunities when overseeing the issuer's strategy, its decisions on major transactions, and its risk management processes and related policies, including whether the body(s) or individual(s) has considered trade-offs associated with those risks and opportunities; (iv) how the body(s) or individual(s) oversees the setting of, and monitors progress towards, targets related to climate-related risks and opportunities (see paragraphs 37 to 40), including whether and how related performance metrics are included in remuneration policies (see paragraph 35); and	Sustainability Governance Climate mitigation and resilience
	(b) management's role in the governance processes, controls and procedures used to monitor, manage and oversee climate-related risks and opportunities, including information about: (i) whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee; and (ii) whether management uses controls and procedures to support the oversight of climate-related risks and opportunities and, if so, how these controls and procedures are integrated with other internal functions.	Sustainability Governance Climate mitigation and resilience

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
Strategy		
20 IFRS S2 para. 10	An issuer shall disclose information to enable an understanding of climate-related risks and opportunities that could reasonably be expected to affect the issuer's cash flows, its access to finance or cost of capital over the short, medium or long term. Specifically, the issuer shall:	
	(a) describe climate-related risks and opportunities that could reasonably be expected to affect the issuer's cash flows, its access to finance or cost of capital over the short, medium or long term;	Climate mitigation and resilience
	(b) explain, for each climate-related risk the issuer has identified, whether the issuer considers the risk to be a climate-related physical risk or climate-related transition risk;	Climate mitigation and resilience
	(c) specify, for each climate-related risk and opportunity the issuer has identified, over which time horizons – short, medium or long term – the effects of each climate-related risk and opportunity could reasonably be expected to occur; and	Climate mitigation and resilience
	(d) explain how the issuer defines 'short term', 'medium term' and 'long term' and how these definitions are linked to the planning horizons used by the issuer for strategic decision-making.	Climate mitigation and resilience
21 IFRS S2 para. 13	An issuer shall disclose information that enables an understanding of the current and anticipated effects of climate-related risks and opportunities on the issuer's business model and value chain. Specifically, the issuer shall disclose:	
	(a) a description of the current and anticipated effects of climate-related risks and opportunities on the issuer's business model and value chain; and	Climate mitigation and resilience
	(b) a description of where in the issuer's business model and value chain climate-related risks and opportunities are concentrated (for example, geographical areas, facilities and types of assets).	Climate mitigation and resilience

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
22 IFRS S2 para. 14	An issuer shall disclose information that enables an understanding of the effects of climate-related risks and opportunities on its strategy and decision-making. Specifically, the issuer shall disclose:	
	(a) information about how the issuer has responded to, and plans to respond to, climate-related risks and opportunities in its strategy and decision-making, including how the issuer plans to achieve any climate-related targets it has set and any targets it is required to meet by law or regulation. Specifically, the issuer shall disclose information about: (i) current and anticipated changes to the issuer's business model, including its resource allocation, to address climate-related risks and opportunities; (ii) current and anticipated adaptation and mitigation efforts (whether direct or indirect); (iii) any climate-related transition plan the issuer has (including information about key assumptions used in developing its transition plan, and dependencies on which the issuer's transition plan relies), or an appropriate negative statement where the issuer does not have a climate-related transition plan; and (iv) how the issuer plans to achieve any climate-related targets (including any greenhouse gas emissions targets (if any)), described in accordance with paragraphs 37 to 40; and	Climate mitigation and resilience
	(b) information about how the issuer is resourcing, and plans to resource, the activities disclosed in accordance with paragraph 22(a).	Climate mitigation and resilience
23 IFRS S2 para. 14	An issuer shall disclose information about the progress of plans disclosed in previous reporting years in accordance with paragraph 22(a).	Climate mitigation and resilience
24 IFRS S2 para. 16	An issuer shall disclose qualitative and quantitative information about:	
	(a) how climate-related risks and opportunities have affected its financial position, financial performance and cash flows for the reporting year; and	Climate mitigation and resilience
	(b) the climate-related risks and opportunities identified in paragraph 24(a) for which there is a significant risk of a material adjustment within the next annual reporting year to the carrying amounts of assets and liabilities reported in the related financial statements.	There is minimal risk of a substantial adjustment occurring in the upcoming annual reporting period.

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
25 IFRS S2 para. 16	The issuer shall provide qualitative and quantitative disclosures about:	
	(a) how the issuer expects its financial position to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities, taking into consideration: (i) its investment and disposal plans; and (ii) its planned sources of funding to implement its strategy; and	Climate mitigation and resilience The Group does not currently expect climate-related risks and opportunities to have a material impact on its financial position, financial performance or cash flows over the short, medium or long term. Looking ahead, we will consider the practicality and usefulness of undertaking more detailed quantification of the financial effects of climate-related factors, with a view to incorporating such analysis into future reporting where appropriate.
	(b) how the issuer expects its financial performance and cash flows to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities.	

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
26 IFRS S2 para. 22	An issuer shall disclose information that enables an understanding of the resilience of the issuer's strategy and business model to climate-related changes, developments and uncertainties, taking into consideration the issuer's identified climate-related risks and opportunities. An issuer shall use climate-related scenario analysis to assess its climate resilience using an approach that is commensurate with an issuer's circumstances. In providing quantitative information, the issuer may disclose a single amount or a range. Specifically, the issuer shall disclose:	
	(a) the issuer's assessment of its climate resilience as at the reporting date, which shall enable an understanding of: (i) the implications, if any, of the issuer's assessment for its strategy and business model, including how the issuer would need to respond to the effects identified in the climate-related scenario analysis; (ii) the significant areas of uncertainty considered in the issuer's assessment of its climate resilience; and (iii) the issuer's capacity to adjust, or adapt its strategy and business model to climate change over the short, medium or long term;	Climate mitigation and resilience

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
	(b) how and when the climate-related scenario analysis was carried out, including: (i) information about the inputs used, including: (1) which climate-related scenarios the issuer used for the analysis and the sources of such scenarios; (2) whether the analysis included a diverse range of climate-related scenarios; (3) whether the climate-related scenarios used for the analysis are associated with climate-related transition risks or climate-related physical risks; (4) whether the issuer used, among its scenarios, a climate-related scenario aligned with the latest international agreement on climate change; (5) why the issuer decided that its chosen climate-related scenarios are relevant to assessing its resilience to climate-related changes, developments or uncertainties; (6) time horizons the issuer used in the analysis; and (7) what scope of operations the issuer used in the analysis (for example, the operation, locations and business units used in the analysis); (ii) the key assumptions the issuer made in the analysis; and (iii) the reporting year in which the climate-related scenario analysis was carried out.	Climate mitigation and resilience

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
Risk Management		
27 IFRS S2 para. 25	An issuer shall disclose information about: (a) the processes and related policies it uses to identify, assess, prioritise and monitor climate-related risks, including information about: (i) the inputs and parameters the issuer uses (for example, information about data sources and the scope of operations covered in the processes); (ii) whether and how the issuer uses climate-related scenario analysis to inform its identification of climate-related risks; (iii) how the issuer assesses the nature, likelihood and magnitude of the effects of those risks (for example, whether the issuer considers qualitative factors, quantitative thresholds or other criteria); (iv) whether and how the issuer prioritises climate-related risks relative to other types of risks; (v) how the issuer monitors climate-related risks; and (vi) whether and how the issuer has changed the processes it uses compared with the previous reporting year;	Climate mitigation and resilience
	(b) the processes the issuer uses to identify, assess, prioritise and monitor climate-related opportunities (including information about whether and how the issuer uses climate-related scenario analysis to inform its identification of climate-related opportunities); and	Climate mitigation and resilience
	(c) the extent to which, and how, the processes for identifying, assessing, prioritising and monitoring climate-related risks and opportunities are integrated into and inform the issuer's overall risk management process.	Climate mitigation and resilience
Metrics and Targets		
28 IFRS S2 para. 29	An issuer shall disclose its absolute gross greenhouse gas emissions generated During the Year, expressed as metric tons of CO_2 equivalent, classified as:	
	(a) Scope 1 greenhouse gas emissions;	Climate mitigation and resilience Performance Data Summary
	(b) Scope 2 greenhouse gas emissions; and	
	(c) Scope 3 greenhouse gas emissions.	

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
29 IFRS S2 para. 29	An issuer shall:	
	(a) measure its greenhouse gas emissions in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) unless required by a jurisdictional authority or another exchange on which the issuer is listed to use a different method for measuring greenhouse gas emissions;	Climate mitigation and resilience Performance Data Summary
	(b) disclose the approach it uses to measure its greenhouse gas emissions including: (i) the measurement approach, inputs and assumptions the issuer uses to measure its greenhouse gas emissions; (ii) the reason why the issuer has chosen the measurement approach, inputs and assumptions it uses to measure its greenhouse gas emissions; and (iii) any changes the issuer made to the measurement approach, inputs and assumptions During the Year and the reasons for those changes;	Climate mitigation and resilience Performance Data Summary
	(c) for Scope 2 greenhouse gas emissions disclosed in accordance with paragraph 28(b), disclose its location-based Scope 2 greenhouse gas emissions, and provide information about any contractual instruments that is necessary to enable an understanding of the issuer's Scope 2 greenhouse gas emissions; and	Climate mitigation and resilience Performance Data Summary
	(d) for Scope 3 greenhouse gas emissions disclosed in accordance with paragraph 28(c), disclose the categories included within the issuer's measure of Scope 3 greenhouse gas emissions, in accordance with the Scope 3 categories described in the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011).	Climate mitigation and resilience

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
30 IFRS S2 para. 29	An issuer shall disclose the amount and percentage of assets or business activities vulnerable to climate-related transition risks.	Given the nature of the Group's business operations, climate change has been assessed as a non-material issue in relation to the Group's direct operations. Nevertheless, the Group continues to monitor climate-related risks and opportunities and considers their potential implications for its long-term business resilience and sustainability.
31 IFRS S2 para. 29	An issuer shall disclose the amount and percentage of assets or business activities vulnerable to climate-related physical risks.	Given the nature of the Group's business operations, climate change has been assessed as a non-material issue in relation to the Group's direct operations. Nevertheless, the Group continues to monitor climate-related risks and opportunities and considers their potential implications for its long-term business resilience and sustainability.
32 IFRS S2 para. 29	An issuer shall disclose the amount and percentage of assets or business activities aligned with climate-related opportunities.	Given the nature of the Group's business operations, climate change has been assessed as a non-material issue in relation to the Group's direct operations. Nevertheless, the Group continues to monitor climate-related risks and opportunities and considers their potential implications for its long-term business resilience and sustainability.

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
33 IFRS S2 para. 29	An issuer shall disclose the amount of capital expenditure, financing or investment deployed towards climate-related risks and opportunities.	Given the nature of the Group's business operations, climate change has been assessed as a non-material issue in relation to the Group's direct operations. Nevertheless, the Group continues to monitor climate-related risks and opportunities and considers their potential implications for its long-term business resilience and sustainability.
34 IFRS S2 para. 29	An issuer shall disclose:	
	(a) an explanation of whether and how the issuer is applying a carbon price in decision-making (for example, investment decisions, transfer pricing, and scenario analysis); and	The Group currently does not apply a carbon price in decision-making.
	(b) the price of each metric tonne of greenhouse gas emissions the issuer uses to assess the costs of its greenhouse gas emissions; or an appropriate negative statement that the issuer does not apply a carbon price in decision-making.	
35 IFRS S2 para. 29	An issuer shall disclose whether and how climate-related considerations are factored into remuneration policy, or an appropriate negative statement. This may form part of the disclosure under paragraph 19(a)(iv).	The Group currently does not factor climate-related considerations into remuneration policy. The Group will explore the feasibility of incorporating these considerations into our remuneration policy in future.
36 IFRS S2 para. 32	An issuer is encouraged to disclose industry-based metrics that are associated with one or more particular business models, activities or other common features that characterise participation in an industry. In determining the industry-based metrics that the issuer discloses, an issuer is encouraged to refer to and consider the applicability of the industry-based metrics associated with disclosure topics described in the IFRS S2 Industry-based Guidance on implementing Climate-related Disclosures and other industry-based disclosure requirements prescribed under other international ESG reporting frameworks.	The Group currently does not apply industry-based metrics in disclosure. The Group will keep assessing the necessity of industry-based metrics application for future reporting years.

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
37 IFRS S2 para. 33	An issuer shall disclose (a) the qualitative and quantitative climate-related targets the issuer has set to monitor progress towards achieving its strategic goals; and (b) any targets the issuer is required to meet by law or regulation, including any greenhouse gas emissions targets. For each target, the issuer shall disclose:	
	(a) the metric used to set the target;	Climate mitigation and resilience
	(b) the objective of the target (for example, mitigation, adaptation or conformance with science-based initiatives);	Climate mitigation and resilience
	(c) the part of the issuer to which the target applies (for example, whether the target applies to the issuer in its entirety or only a part of the issuer, such as a specific business unit or geographic region);	Climate mitigation and resilience
	(d) the period over which the target applies;	Climate mitigation and resilience
	(e) the base period from which progress is measured;	Climate mitigation and resilience
	(f) milestones or interim targets (if any);	Climate mitigation and resilience
	(g) if the target is quantitative, whether the target is an absolute target or an intensity target; and	Climate mitigation and resilience
	(h) how the latest international agreement on climate change, including jurisdictional commitments that arise from that agreement, has informed the target.	Climate mitigation and resilience
38 IFRS S2 para. 34	An issuer shall disclose information about its approach to setting and reviewing each target, and how it monitors progress against each target, including:	
	(a) whether the target and the methodology for setting the target has been validated by a third party;	The Group currently does not validate the target and the methodology for setting the target by a third party. We will evaluate the feasibility of third-party validation on targets and methodologies for future reporting years.
	(b) the issuer's processes for reviewing the target;	Climate mitigation and resilience
	(c) the metrics used to monitor progress towards reaching the target; and	Climate mitigation and resilience

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
	(d) any revisions to the target and an explanation for those revisions.	No major revisions have been made to climate-related targets during the reporting period.
39 IFRS S2 para. 35	An issuer shall disclose information about its performance against each climate-related target and an analysis of trends or changes in the issuer's performance.	Climate mitigation and resilience
40 IFRS S2 para. 36	For each greenhouse gas emissions target disclosed in accordance with paragraphs 37 to 39, an issuer shall disclose:	
	(a) which greenhouse gases are covered by the target;	Climate mitigation and resilience
	(b) whether Scope 1, Scope 2 or Scope 3 greenhouse gas emissions are covered by the target;	Climate mitigation and resilience Scope 3 greenhouse gas emissions are not covered by the target during the reporting period. We will keep assessing the necessity of target setting on scope 3 emissions for future reporting years.
	(c) whether the target is a gross greenhouse gas emissions target or a net greenhouse gas emissions target. If the issuer discloses a net greenhouse gas emissions target, the issuer is also required to separately disclose its associated gross greenhouse gas emissions target;	The Group consider our target as a gross GHG emissions target.
	(d) whether the target was derived using a sectoral decarbonisation approach; and	Targets are not derived using a sectoral decarbonization approach.

ESG REPORTING CODE CONTENTS INDEX

Reference Paragraph	Description	Reference and remarks
	(e) the issuer's planned use of carbon credits to offset greenhouse gas emissions to achieve any net greenhouse gas emissions target. In explaining its planned use of carbon credits, the issuer shall disclose: (i) the extent to which, and how, achieving any net greenhouse gas emissions target relies on the use of carbon credits; (ii) which third-party scheme(s) will verify or certify the carbon credits; (iii) the type of carbon credit, including whether the underlying offset will be nature-based or based on technological carbon removals, and whether the underlying offset is achieved through carbon reduction or removal; and (iv) any other factors necessary to enable an understanding of the credibility and integrity of the carbon credits the issuer plans to use (for example, assumptions regarding the permanence of the carbon offset).	The Group does not currently use carbon credits to offset greenhouse gas emissions. We are committed to optimizing energy efficiency and climate resilience in our business operation and will keep assessing the necessity of purchasing carbon credits in the future.
41 IFRS S2 para. 23, 37	In preparing disclosures to meet the requirements in paragraphs 21 to 26 and 37 to 38, an issuer shall refer to and consider the applicability of cross-industry metrics (see paragraphs 28 to 35) and (ii) industry-based metrics (see paragraph 36).	The Group currently does not apply cross-industry metrics and industry-based metrics in disclosure. We will keep assessing the necessity of cross-industry metrics and industry-based metrics application for future reporting years.

SUNeVision Holdings Ltd.
新意網集團有限公司

Unit 3110, 31/F, Standard Chartered Tower
Millennium City 1, 388 Kwun Tong Road
Kwun Tong, Kowloon, Hong Kong

www.sunevision.com