



HKT TRUST

*(A TRUST CONSTITUTED ON 7 NOVEMBER 2011 UNDER THE LAWS OF HONG KONG AND MANAGED
BY HKT MANAGEMENT LIMITED)*

AND

HKT LIMITED

*(INCORPORATED IN THE CAYMAN ISLANDS WITH LIMITED LIABILITY)
(STOCK CODE: 6823)*

Climate Change Policy

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DOCUMENT CHANGE RECORD

Version No.	Description of Changes	Modified by	Approved by	Release Date
2.0	<ul style="list-style-type: none"> Migrated energy-related policies to Climate Change Policy Revised the content based on the international standards and principles 	Facilities Management / Group Communications	RMCCC	December 2025

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1. INTRODUCTION

1.1 Purpose

This Climate Change Policy (the “Policy”) serves as a principle-based policy to affirm the commitment of HKT Trust and HKT Limited (“HKT”) and its subsidiaries in Hong Kong and internationally (collectively, the “Group”) to combating climate change, minimising the extent of adverse effects to the environment, and creating long-term value for our shareholders, customers, and society as a whole through effective energy management and Greenhouse Gas emissions (“GHG emissions”) reduction. The Policy is not exhaustive and more specific actions would be implemented beyond this Policy.

1.2 Scope

The Policy applies to all employees of the Group (“Employees”). Employees should ensure that all suppliers, contractors, subcontractors, service providers, agents, intermediaries and individuals acting in any capacity for or on behalf of the Group undertake to abide by this Policy.

All stakeholders in the supply chain of the Group’s business are encouraged to adopt this Policy as a form of best practice for their own respective businesses.

1.3 GHG Emissions

The Group recognises that climate change is one of the most pressing global challenges. The Group is committed to:

- *Principle:*
 - (a) complying with legal and regulatory requirements in the markets/countries where the Group is operating;
 - (b) adhering to other environmental conservation policy, including the water management policy issued by the Group;
 - (c) disclosing and mitigating Scope 1 & 2 emissions (in particular related to telecommunications networks and data centre operations) as well as the upstream and downstream Scope 3 emissions, including distribution and logistics;
 - (d) educating and raising awareness regarding climate change to the Employees through training; and
 - (e) building business resilience through climate adaptation, including but not limited to enhancing infrastructure resilience, implementing contingency plans and exploring low-carbon technologies.
- *Scope 1 emissions:*
 - (a) supporting the adoption of renewable energy;
 - (b) reducing the mobile combustion generated by vehicles owned or controlled by the Group; and
 - (c) minimising the usage of ozone depleting gases (relating to the use of synthetic halogenated chemicals, including chlorine or bromine) and high global warming potential gases (in particular the hydrofluorocarbons (HFCs) stated under the Kigali Amendment), and where possible substituting with alternatives that have a reduced to eliminated effect on the environment.
- *Scope 2 emissions:*
 - (a) ensuring all services and equipment operate at optimum efficiency (in particular by routine inspection and effective maintenance); and
 - (b) incorporating cleaner energy supplies and technology designed to reduce dependence on fossil fuel-based energy supplies.
- *Scope 3 emissions:*
 - (a) supporting appropriate energy conservation within the community;
 - (b) considering energy implications associated with products and services to be procured;
 - (c) supporting and encouraging suppliers to improve their decarbonisation progress; and
 - (d) not unnecessarily undertaking air travel, using vehicles or contributing to activities that may create carbon emissions.

1.4 Management and Monitoring

The Risk Management, Controls and Compliance Committee (“RMCCC”) is responsible for assisting the Board and/or the Audit Committee in the review of the effectiveness of the Group’s risk management and internal control systems on an ongoing basis, including the oversight of climate related risks and opportunities as well as the approval of relevant policies.

The Sustainability Committee, comprising senior management members, is responsible for monitoring the progress on climate change-related initiatives and its relevant goals and targets.

1.5 Changes

Changes to this Policy and any associated documents will occur from time to time. Any such changes will be communicated to all Employees via publication on the Group’s intranets.

The versions published on the Group’s Intranets at the time of the reference will be the authoritative versions of these documents, superseding any previously published versions of the same documents.