



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)*

Sustainability Policy

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DOCUMENT CHANGE RECORD

Version No.	Description of Changes	Modified by	Approved by	Release Date
1.0-3.0	<i>Previous versions</i>	-	-	-
4.0	<ul style="list-style-type: none"> Refreshed the Sustainability Policy (previous name: Corporate Social Responsibility Policy) to align with market best practice and with reference to HKEX ESG Reporting Guide, ESG ratings' assessment or peer reference, over content including product quality assurance and tax compliance Removed content with reference to ISO 26000, mentioning of other Group's policies, and terms that are initiatives instead of principles 	Group Communications, Facilities Management, Group Human Resources, Group Purchasing and Supply, Corporate Secretariat, Product Assurance Teams, Consumer Business Group, Digital Ventures, Commercial Group	RMCCC	December 2025

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1. INTRODUCTION

1.1 Purpose

The purpose of this Sustainability Policy (the “Policy”) is to ensure that HKT Trust and HKT Limited (collectively “HKT” or the “Company”) and its subsidiaries, affiliates and associated companies, in Hong Kong and internationally (the “HKT Group” or the “Group”), consistently operate in a responsible manner. This Policy promotes socially responsible conduct by integrating sustainability management best practices and processes and outlining sustainability related risks within our daily operations.

1.2 Our Vision

Our vision is to embody the highest standards of social and environmental responsibility as we provide telecommunications, media and related services. The Group is dedicated to delivering an exceptional customer experience whilst actively establishing meaningful connections within and supporting the communities we serve.

1.3 Our Mission

Our mission is to utilise our services to empower, connect and transform communities and businesses by:

- helping to minimise the environmental impact of our business and our customers through our products and services;
- valuing and developing our talented team;
- promoting sustainability principles throughout our operations and supply chains;
- pioneering products and services that enable our communities and businesses to thrive; and
- addressing and responding to needs and concerns from the communities and businesses to drive progress.

1.4 Applicability

The Policy is applicable to all employees of the Group. All suppliers, contractors, subcontractors, service providers, agents, intermediaries, key business partners (e.g. non-managed operations, joint venture partners, licensees, outsourcing partners, etc.) acting in any capacity for or on behalf of the Group should be made aware of and are encouraged to adopt the Policy as best practice guidance for their own businesses with the aim of ensuring consistent sustainable operational practices.

2. SUSTAINABILITY AT HKT

The Policy, together with the Code of Conduct (“CoC”), which covers topics related to corporate governance, set out the Group’s strategies and objectives regarding Environmental, Social and Governance (“ESG”) issues. This section outlines our policies and approach in relation to these core areas and the relevant topics.

2.1 Our Sustainability Management Approach

The Group aims at achieving sustainability without creating adverse impact on our profitability. This requires recognising the seven principles of socially responsible behaviour: accountability, transparency, ethical behaviour, respect for stakeholder interests, respect for the rule of law, respect for international norms of behaviour and respect for human rights.

- *Sustainability governance*

The Group’s commitment to sustainability is championed by its Board of Directors (the “Board”). The Board is responsible for overseeing our sustainability strategy and acts as the final decision-making body.

The Risk Management, Control and Compliance Committee (“RMCCC”) assists 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 sustainability risks through the Group Enterprise Risk Management System according to the Group’s regulatory, fiscal and market mechanisms. It is also responsible for approving the Policy after Sustainability Committee revision.

The Sustainability Committee is a sub-committee under the Board chaired by the Head of Group Communications and Brand and comprising representatives of the Group functional unit heads. It is responsible for reviewing the Group’s sustainability strategy, principles and policies to ensure that the Group operates in a manner that enhances its positive contribution to society and the environment.

ESG team and departmental ESG representatives, together with the Environmental Advisory Group, serve as sustainability drivers to ensure the implementation and operation of sustainability initiatives across the Group.

- *Stakeholder identification and engagement*

Our sphere of influence includes shareholders, employees, customers, the communities in which we primarily operate, suppliers, business partners, investors and regulators. When addressing the impact of our decisions and activities, we consider the political, contractual, economic and any other relationship through which the Group has the ability to influence the decisions or activities of individuals or organisations.

Our objectives to stakeholder engagement are to be transparent, accountable and collaborative, focusing on improving how we incorporate stakeholder viewpoints into business decisions. To ensure we meet these objectives, we:

- (a) take stakeholder viewpoints into consideration when making business decisions, which we may change according to the Group’s business priorities and sustainability focus areas;
- (b) communicate progress made with regard to our sustainability performance through open dialogue in a timely, accurate and verifiable manner; and
- (c) raise stakeholder awareness of sustainability topics through various training and programmes.

2.2 The Environment

The Group is committed to addressing environmental issues and reducing our environmental impacts through an effective environmental management mechanism and considering the whole value chain, which covers areas within our operations and business facilities, corporate processes, distribution, logistics and consumers. Our objectives are to assess, reduce and mitigate environmental risks and impact associated with our activities and to continuously improve the environmental performance of the Group. We also seek to utilise our products, services and expertise to assist in the development of solutions to environmental problems.

To meet our objectives, we:

- (a) develop, implement and review our environmentally related initiatives and performance through a set of policies and protocols covering water, climate change, waste and energy consumption;
- (b) uphold the waste management principles of reducing, recycling, repairing and reusing and encourage resource efficiency to minimise waste generation;
- (c) communicate our commitment to environmental responsibility by raising awareness and inspiring support for environmental efforts across the Group and our sphere of influence;
- (d) continually improve the Group's environmental performance by setting targets as well as monitoring, measuring and publicly reporting progress against those targets annually, and collecting stakeholders' opinion on environmental issues;
- (e) assess potential environmental impact before commencing a new activity or project and establish measures to minimise the potential impact;
- (f) ensure that the operations of all business and functional units comply with relevant environmental legislation and mandatory standards;
- (g) raise awareness of employees on the telecommunication industry's role in enhancing environmental sustainability, including addressing and mitigating climate change impact through providing low-carbon connectivity services;
- (h) identify and assess any potential adverse impact of our activities on the ecosystem; and
- (i) protect and conserve the surrounding biodiversity and ecosystems and take measures to prevent land degradation, contamination and deforestation in the process of developing and decommissioning infrastructure.

2.3 Employment and Labour

The Group is committed to providing a motivating, rewarding, safe, diverse and inclusive working environment that encourages collaboration and offers our employees opportunities to learn, grow and succeed at work and in life. Our Human Resources mission is to be an employer of choice and build a productive workplace that delivers high-level business performance.

To meet our objective, we:

- (a) develop, implement and review employment-related policies to ensure compliance to the local laws and regulations;
- (b) ensure employees are protected by a constructive employment relationship within an appropriate legal and institutional framework, or are legitimately employed of their own will and that no form of child or forced labour, slavery or human trafficking is taking place in any of part of our business;
- (c) provide employees with labour protection (i.e. in compliance with laws and regulations that govern work including wages, working hours, health and safety, trade-union freedom, freedom of association, freedom of speech, the right to industrial action and the right to collective bargaining, where applicable);
- (d) ensure remuneration to be determined based on performance, conduct and market standards, devoid of any bias related to gender, and ensure fair rewards for equal work;
- (e) provide employees with a safe and harassment-free working environment and continuously monitor the workplace conditions;
- (f) maintain and ensure a high standard of health and safety, including the implementation of a Safety Plan that aligned with the Code of Practice on Safety Management issued by the Labour Department of HKSAR;
- (g) attract, retain and develop our people to reach their full potential and provide a working environment that supports professional and personal development;
- (h) provide staff at various stages of their career with access to skills development and training for career advancement, on an equal and non-discriminatory basis; and
- (i) encourage communication with employees through various platforms and channels including but not limited to face-to-face meetings, forums, employee satisfaction survey, intranet, social media and online survey.

2.4 Supply Chain Management

The Group upholds the highest ethical and professional standards when dealing with suppliers, contractors, subcontractors, service providers, agents and intermediaries (the “suppliers”). It is our objective to reduce environmental and social risks in our supply chain. The Group has in place supplier-related policies and Supplier Code of Conduct (“Supplier CoC”) to facilitate and communicate with our suppliers and contractors regarding their compliance with labour, health and safety, and environmental regulations.

To meet our objective, we:

- (a) share the Policy and Supplier CoC with the suppliers and encourage them to adopt sustainable initiatives aligned with these policies;
- (b) ensure that our goods and services are procured from environmentally and socially responsible suppliers and contractors as far as practicable, including through regular supplier screening and assessment;
- (c) identify and mitigate supply chain risks by conducting due diligence, especially to ensure that the basic rights of workers as set out in local and international guidelines are upheld and adhered to wherever possible in our supply chain;
- (d) adopt preventive measures that minimise any environmental impact derived from supplier activities;
- (e) raise awareness among suppliers of minimising potential environmental impact; and
- (f) monitor supplier performance and conduct performance reviews yearly, and communicate unsatisfactory ratings for rectification and improvement.

2.5 Customers and Marketplace

The Group adheres to applicable laws protecting individual privacy and commercially sensitive information, including those related to materials used in our products, advertising and labelling.

As our services and products are deeply embedded in the daily lives of our customers, we are committed to delivering them to the best of our ability by continually elevating our level of service. It is our objective to gain customer confidence in our products and services and to provide sufficient information for them to make informed choices.

To meet our objective, we:

- (a) continuously improve the customer experience by utilising our well-developed customer relationship management systems and ensuring that our products and services are safe, user-friendly and environmentally friendly;
- (b) ensure the safety and reliability of our products and services as well as those of our suppliers and manufacturers;
- (c) ensure effective quality assurance processes and efficient product recall procedures;
- (d) view privacy and security of personal data as a priority and adhere to the relevant policies set out by the Group;
- (e) are committed to promoting the responsible and ethical development and application of technologies including artificial intelligence (“AI”) and innovations; and
- (f) safeguard and protect intellectual property by maintaining relevant standards and protocols and by disclosing practices related to intellectual property rights to relevant stakeholders.

2.6 Community

The Group is in a position to enable and empower the communities in which we primarily operate that we believe are most relevant to our business and where we can make the most impact through our actions and expertise. It is our objectives to be a good corporate citizen to our communities and improve the quality of life.

To meet our objectives, we:

- (a) ensure compliance with all tax laws and regulations across each jurisdiction in which we run business;
- (b) ensure that the communities in which the Group primarily operate are informed in a timely manner of, and are involved in, any organisational developments which may affect them;
- (c) seek to communicate with representative community groups when determining priorities for social investment and community development activities;
- (d) enable the digital transformation and literacy of society as much as possible;
- (e) are respectful of vulnerable, marginalised, discriminated and under-represented groups and ensure our activities respect local and internationally recognised principles for community empowerment in a culturally and diversity sensitive manner;
- (f) partner with other organisations, including governments, businesses or NGOs to maximise synergies and make use of complementary resources, knowledge and skills;
- (g) prepare youth for the jobs of the future in the digital economy by equipping young people from economically challenged backgrounds to build a better future; and
- (h) promote and support education at various levels and engage in actions that improve the quality of and access to education.

3. CONTACT POINT FOR THE POLICY

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4. POLICY CHANGES

Changes to the Group policies and any associated documents will occur from time to time. Any changes to the policy documents and/or their associated documents will be communicated via publication on the Group website.

The versions published on the Group website at the time of reference will be the authoritative version of these documents and will supersede any previously published versions of the same documents.