

Yettel Bulgaria

2025 Sustainability Report

Yettel.

Everything connected to you



Table of Contents

Introduction	3	Health and Safety	43
From the CEO	3	Diversity, Equity and Inclusion	45
2025 Performance Highlights	4	Training and Skill Development	49
General Basis for Preparation of this Report	6	Workers in the Value Chain	53
Business Model, Strategy and Value chain	7	Accelerating Technology for a Sustainable Future	56
The Role of the Administrative, Management and Supervisory Bodies	14	Consumers and End-Users	56
Interests and Views of Stakeholders	17	Reliable Connectivity and Digital Skills Improvement	56
Risk Management and Internal Controls over Sustainability Reporting	19	Network Safety and Public Health	59
Material Impacts, Risks and Opportunities	20	Smart Solutions that Benefit People and the Environment	61
Reducing Our Environmental Footprint	22	Safeguarding Personal Data	63
Climate Change	22	Entity Specific Topic: Cybersecurity	65
Resource Use and Circular Economy	28	Acting with Integrity and Transparency	68
Putting People at the Center of Everything We Do	35	Business Conduct	68
Own Workforce	35	Appendix A: ESG Data Disclosures	71
Working Conditions	35	Appendix B: GRI and ESRS Disclosures Mapping Index Table	76



Bogdan Uzelac
Chief Executive Officer

From the CEO

2025 marked an important point in Yettel Bulgaria's sustainability journey. We **achieved three of our long-term strategic goals ahead of schedule** - reducing Scope 1 and 2 carbon emissions beyond the target set for 2030, surpassing our target for preventing devices and accessories from becoming electronic waste and extending 5G coverage beyond the level originally planned for 2026. For me, this is strong evidence that sustainability creates the greatest value when it is embedded in business decisions, investments and the way we operate every day.

Our energy transition stands as a powerful testament to this progress. Today, **100% of the electricity used by Yettel comes from renewable sources**, helping us reduce Scope 2 emissions by 99% compared to 2022. At the same time, our **network is carrying significantly more data without a corresponding increase in energy consumption**. This is the direction we want to follow - growing our business while continuously improving the efficiency and resilience of the infrastructure behind it.

Our role, however, goes beyond reducing our own footprint. As a technology company, we can create broader impact by giving people and businesses access to better connectivity, digital skills and more sustainable solutions. In 2025, **our 5G network reached 86.59% of Bulgaria's population**, while our **Online Safety and Digital Literacy Program** continued to engage tens of thousands of children, teachers and parents. We also introduced Bulgaria's first **devices buy-back service for business customers** offered by a telecom, aiming to help extend the lifecycle of devices and use technology more efficiently.

Long-term progress also depends on the ecosystem around us. This is why we are increasingly **integrating ESG principles into how we work with suppliers and how we develop our own people**. From introducing ESG assessment at the very start of the supplier selection process to having 90% of our employees complete an AI training program, our focus is on building the capabilities and partnerships that will support the next stage of Yettel's development.

The results in this report give us confidence that we are moving in the right direction. More importantly, they raise the bar for what comes next and challenge us to turn today's achievements into even greater impact tomorrow.

2025 Performance Highlights

Business Performance



- Retail network of **182 stores** across **102 cities**, home to over **66% of Bulgarian population**
- **3.441 mln¹ active mobile users**
- **36.5% market share** by mobile service revenue, **ranking first in Bulgaria**

Climate



- We **reduced our absolute Scope 1 and 2** market-based emissions by **74%** compared with the 2022 base year, surpassing our Group's target of a 42% reduction by 2030
- Together with CETIN, we carried **27% more network traffic** while keeping energy use stable leading to a **20% decrease in the power to traffic ratio**, from 0.12 GWh/PB in 2024 to 0.09 GWh/PB² in 2025

Circular Economy



- Since 2022 we **have prevented 159 662 kg. of e-waste from going to landfill** exceeding our 2028 cumulative target of 127 000 kg. ahead of schedule
- **70%** of our generated waste in 2025 was **recycled or reused**

Our People



- We retained our **Top Employer certification** for a **second consecutive year**
- We provided employees with over **70 000 hours of training**. We **upskilled more than 80% of our people leaders** through the Growth Mindset program and **reached a 90% average completion rate for our AI Training Program**

¹ Including private users and business customers using mobile voice & data, machine-to-machine (M2M), hybrid fix and fixed wireless access (FWA), excluding TV, in line with Yettel Bulgaria's own sustainability reporting over past years

² PB stands for petabytes, equal to 1 000 terabytes (TB)

2025 Performance Highlights

Our Customers



- Our network has been awarded the **Best in Test** certificate for **the 9th consecutive time** with best rated reliability, latency and broadband coverage in Bulgaria
- Our **5G population coverage reached 86.59%**, exceeding our target to provide 5G access to at least 85% of the Bulgarian population ahead of the original 2026 deadline

Cybersecurity



- **0 non-conformities** related to cybersecurity
- **100% compliance** with information security requirements, surpassing the target level of above 85%
- **89% incident management performance**, surpassing our target of above 85%

Supply Chain



- We conducted our **2nd supplier engagement** campaign to assess ESG risks in our value chain with **73% of invited suppliers registered on our platform**, compared to 63% in 2024



Business Conduct



- **0 confirmed** corruption **incidents or substantiated** bribery cases
- **0 outstanding legal proceedings for late payments**

General Basis for Preparation of this Report

This Sustainability Report covers the financial year **from January 1, 2025 to December 31, 2025**, in line with our financial reporting cycle. It has been prepared on an individual and voluntary basis. The report includes data from Yettel Bulgaria's (hereon referred to as the "company", "Yettel" and "we") business operations, including retail locations, corporate offices, warehouse, central administrative building and repair center. It also covers relevant information across our upstream and downstream value chain.

We have largely aligned our disclosure practices with the European Sustainability Reporting Standards (ESRS) and the EU Corporate Sustainability Reporting Directive (CSRD), while also incorporating selected disclosures based on the Global Reporting Initiative (GRI) standards. While CSRD requirements continue to evolve and Yettel is not required to report as an individual entity under the CSRD framework, we are aligning with leading sustainability reporting frameworks to support transparency and contribute to e& PPF Group's (also referred to as "the Group") preparation for CSRD reporting in 2028 for financial year 2027.



For ease of navigation throughout the document, a clickable banner is found at the top of the page.

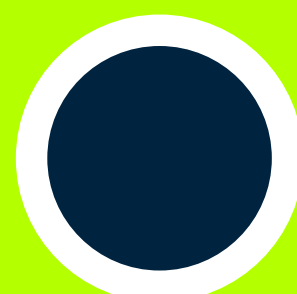


More information on the specific disclosure requirements covered is available in Appendix B on page 76.



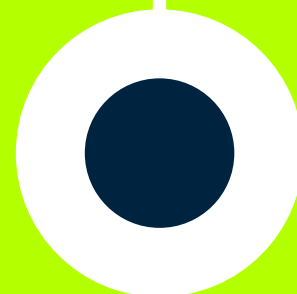
Time Horizons

Unless stated otherwise, the time horizons used in this Sustainability Report are aligned with the ESRS definitions and correspond to the following periods:



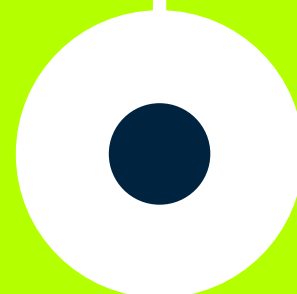
Short-term

Up to 1 year after the end of the current reporting period



Medium-term

Between 1 and 5 years after the end of the current reporting period



Long-term

More than 5 years after the end of the current reporting period

Contact Information

Though not externally audited, the report reflects our integrity and transparency in sustainability reporting. Prepared in English, the report is available on our corporate website as of 30th September 2026. As Yettel Bulgaria advances towards more sustainable practices, we remain committed to providing insightful and transparent disclosures that reflect our impact on the environment and society.



For additional inquiries or feedback regarding this report, stakeholders are encouraged to contact us via email at **esg@yettel.bg**.

Business Model, Strategy and Value Chain

Our Business

Yettel Bulgaria's connectivity services are supported by CETIN Bulgaria, which manages the infrastructure and wholesale activities behind these services. This partnership allows Yettel to focus on developing its products and customer services, while CETIN oversees the telecommunications and IT infrastructure.



► CETIN

Construction and maintenance of the physical infrastructure needed to provide telecom services



Towers, antennas & base stations

Rooftop antennas & small cells

Technical site, power & backup

Data center & network operations

Transmission links

Yettel.

Provision of digital services and customer care

- Mobile, internet, TV, insurance and other digital services
- Sales and maintenance of devices
- Customer support and billing: B2C and B2B



Yettel stores

Yettel offices

Homes

Businesses

State-owned entities

Together, Yettel and CETIN provide the physical and digital infrastructure that modern life depends on. From everyday communication and remote work to payments, healthcare and education, we keep people connected, businesses running and economies functioning in an increasingly digital world.

Yettel.

Yettel Bulgaria EAD, a wholly owned subsidiary of e& PPF Telecom Group, hereinafter referred to as “the Group”, is a leading telecommunications service provider in Bulgaria, ranking first by revenue and third by subscriber market share, and serving over three million customers. The company provides a comprehensive range of telecommunications and digital services to individual, business and public-sector customers, including mobile voice, data and text messaging, television, fixed broadband and fixed voice services delivered through the mobile network.

Beyond core connectivity, we offer a growing range of digital and value-added services that help customers manage everyday needs and business operations. Our business customers can benefit from smart solutions that support financial management, customer relationship management and document storage. Our wider portfolio also includes cybersecurity and digital protection services, content services, device sales and maintenance, and, more recently, insurance services. Through our retail stores, online channels and business support teams, Yettel helps customers choose, access and manage the services and devices they need in their daily lives and operations. This customer-facing role is central to our ambition to be a trusted digital partner: not only by offering useful services, but also by making them accessible, secure and easy to understand.

▶ CETIN

As one of Bulgaria’s largest electronic communications network operators, CETIN Bulgaria, part of the CETIN Group within e& PPF Telecom Group, provides the infrastructure that supports Yettel’s connectivity services. CETIN’s network covers more than 98% of Bulgaria’s highways and first- and second-class roads. In areas with 5G availability, it supports download speeds of up to 1 Gbps. The company also operates a nationwide fiber optic network, cross-border connections to Serbia and Greece, and two data centers located in Sofia and Plovdiv, Bulgaria. Its data services are delivered through a high-capacity optical transmission network using Dense Wavelength Division Multiplexing (DWDM), a technology that allows large volumes of data to be carried efficiently through fiber infrastructure.

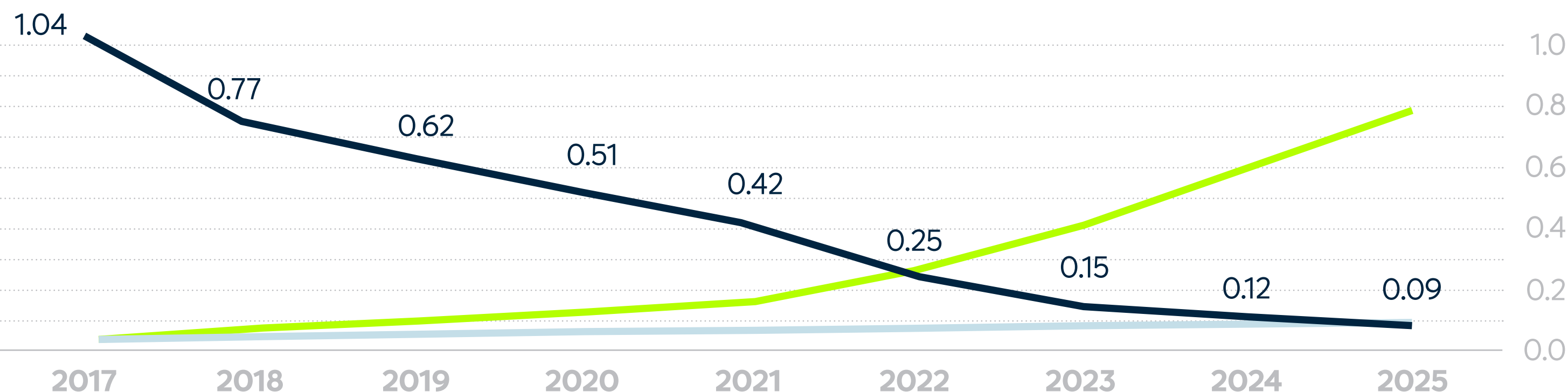
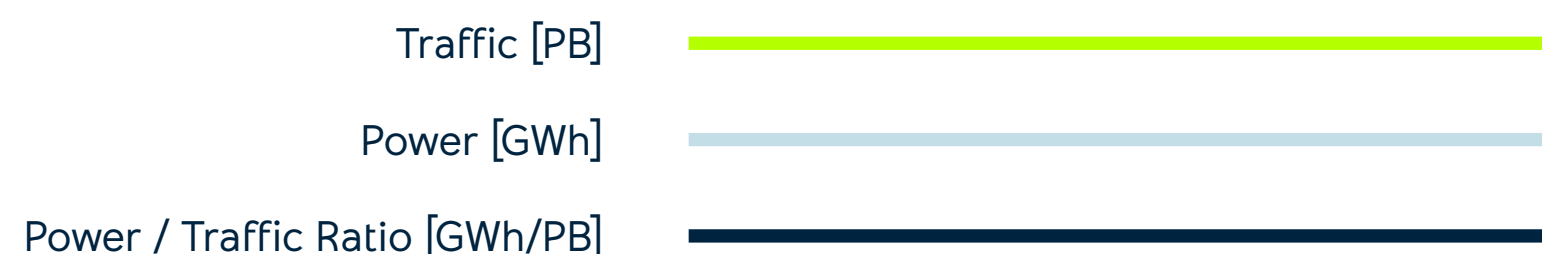
This extensive network allows CETIN to provide reliable wholesale connectivity and infrastructure services that support mobile, fixed and business telecommunications services across the country.



Yettel and CETIN closely cooperate to improve the efficiency and resilience of the network. This year CETIN achieved a strong improvement in network energy efficiency: data traffic increased by 27%, compared to 2024, while electricity consumption remained almost unchanged. This progress was achieved through equipment modernization, further development of 5G infrastructure, server virtualization, automation and remote management tools.

Figure 1

Power to traffic ratio performance: network energy intensity per petabyte of traffic, 2017-2025 (GWh/PB)



As a result, our network carried significantly more traffic with nearly the same energy use, improving the power to traffic ratio by 20%, from 0.12 GWh/PB in 2024 to 0.09 GWh/PB in 2025, showing that greater network capacity can be delivered more efficiently.



Our Values

At Yettel, we believe technology should make life easier and more accessible for everyone. This shapes how we work and make decisions as we provide safe, reliable and accessible digital services, designed with consideration for people and the environment.

Our values guide our everyday actions, the way we work together and how we serve our customers¹.



Be Customer-Obsessed

Customers are at the center of everything we do. We address their needs, use research and insights to understand how these needs are changing and apply what we learn to improve our products, services and customer experience.



Unite as One

We work together across teams, support each other and take shared responsibility for achieving common goals. By building trust and sharing knowledge and resources, we strengthen collaboration and help everyone contribute to their full potential.



Dare to be Bold

We encourage people to propose new ideas, experiment and look for better ways of working. We invest in technology and innovation to develop future-ready products and services, while taking responsibility for our decisions and acting with integrity.

¹ Although this report covers FY 2025, at the time of writing Yettel's Sustainability Report in 2026, the company's corporate values have been updated under the new Code of Conduct, released in March 2026. We have chosen to present the newly updated values to reflect the Yettel's current strategic direction.

Our Sustainability Strategy 2028

Our approach reflects a simple principle: strong business performance matters, but how we achieve it matters just as much. Telecommunications and digital services play an important role in addressing economic, social and environmental challenges by enabling instant communication, access to information and internet services that people, businesses and society rely on.

We contributed to identifying the most important sustainability topics for the Group, which formed the basis for our local Sustainability Strategy 2028. The strategy has been endorsed by Yettel's senior and executive management, reflecting clear leadership commitment to embedding sustainability across the company. In decision-making, management considers our material impacts, risks and opportunities (IROs), including how they affect our business model, value chain and stakeholders. Our strategy includes specific policies, actions and SMART targets, aligned with our business objectives.

Our long-term success depends on providing useful and reliable digital services responsibly, which is why our Sustainability Strategy 2028 focuses on 4 connected priorities: managing our environmental impacts, supporting our people and communities, helping customers use digital services safely and effectively, and maintaining high standards of integrity across our business and value chain.

1

Environment

As a telecommunications company we rely on energy, devices and materials, which create environmental impacts across our operations and value chain. Our approach focuses on reducing our own emissions and energy use in our own operations, increasing renewable electricity use and working with suppliers and partners to better manage value chain impacts.

We also focus on the devices and packaging linked to our business. By supporting responsible sourcing, longer product lifecycles, repair, reuse, recycling and proper end-of-life treatment, we aim to reduce waste and recover more value from the materials already in use.

Environmental targets, part of our Sustainability Strategy 2028:

-  **Minimize Scope 1, 2 and 3 GHG (Greenhouse gas) emissions in line with the e& PPF Telecom Group target to reduce absolute Scope 1 and 2 emissions by 42% and absolute Scope 3 emissions by 25% by 2030, compared with a 2022 base year**
-  **Prevent 127 000 kg of e-waste from going to landfill by 2028**
-  **Reduce packaging waste from our own operations by 40% by 2028 compared to 2021**

As shown in this report, we are on track to achieve these targets and, in some areas, are already performing ahead of the expected pathway.



2

People

Our ability to serve customers, develop relevant digital services and adapt to change depends on the people running our business. We therefore focus on fair and safe working conditions, employee well-being, skills development, inclusion, rights protection and opportunities for people to contribute and grow.

Our social impact also extends beyond our workforce. Through volunteering, sustainable living campaigns and community initiatives, we support people and causes linked to our business, our expertise and the communities in which we operate.

Social targets, part of our Sustainability Strategy 2028:



Reach 40% women in our Technology division by 2028



At least 1 000 employee volunteering hours annually to support people and the environment



Reach 2 500 000 people on sustainable living topics every year



3

Tech for Sustainable Future

Being a digital partner means more than giving customers access to digital services. Our focus is to expand access to high-speed connectivity, help people use technology safely and confidently, improve digital literacy, protect personal data and develop practical solutions that make everyday life easier and help businesses operate more efficiently.

Technological targets, part of our Sustainability Strategy 2028:



Make 5G connectivity available to at least 85% of the Bulgarian population by 2026



Introduce 1 new solution every year, that supports businesses and society in Bulgaria towards sustainability



Improve the digital skills of 50 000 people annually



Ensure resilient cybersecurity & personal data protection



4

Acting with Integrity and Transparency

Responsible business conduct defines how the other three pillars are put into practice. It means making decisions transparently, protecting trust, setting clear expectations for employees and suppliers and ensuring that commercial results are achieved in line with our ethical and compliance standards. This includes training senior management and employees on sustainability, including ethical governance and compliance standards, and working with suppliers to improve alignment with our expectations on responsible business conduct.

Governance targets, part of our Sustainability Strategy 2028:



Conduct annual ESG trainings, aiming to reach 50% of employees and 100% of senior management



Organize an annual supplier engagement campaign on sustainability



How we achieve our goals together with our stakeholders

Initiatives for internal stakeholders

Training and career development

ESG Crew, well-being and health and safety initiatives

Initiatives for external stakeholders

Digital literacy and online safety programs

Accessible services for vulnerable groups

Smart digital solutions for customers and businesses

Network coverage and reliable connectivity

For all stakeholders

Sustainable living campaigns for employees, customers and the public

Volunteering initiatives that support social and environmental causes

Inclusion and accessibility actions for employees and customers, including support for people with disabilities

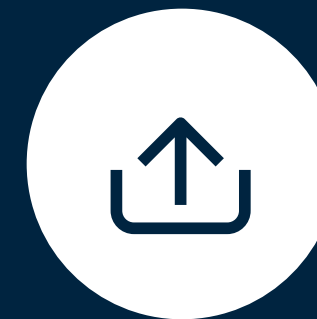
Our Value Chain

Our value chain analysis helped identify impacts, risks and opportunities as part of the double materiality assessment, covering not only our own operations but also relevant upstream and downstream activities.

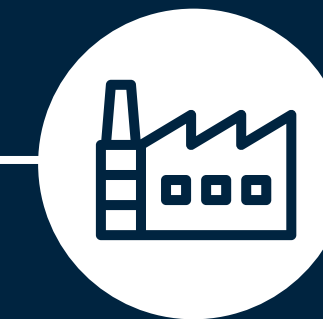
Upstream



Our upstream value chain includes the sourcing, manufacturing, packaging and transportation of the materials, devices and equipment needed to provide telecom services. The operation and maintenance of network infrastructure, carried out by CETIN, which provides the wholesale infrastructure and connectivity services that support our operations, is also considered part of our upstream value chain.



Extraction of raw materials



Manufacturing of devices and network equipment



Packaging and transportation



Network infrastructure, operation and maintenance

Own Operations



In our own operations, we design, sell and manage telecom and digital services for private and business customers. This includes our retail and digital channels, customer care, billing, device-related services and the corporate functions that support our daily work.

Yettel.



Service design and commercial offers



Retail stores, website and digital channels



Customer care and billing



Device sales, servicing and maintenance

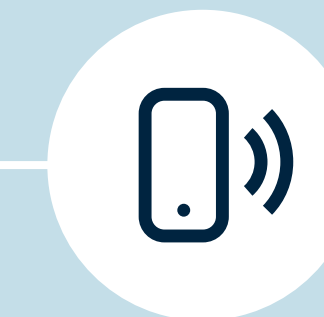


Corporate offices and support functions

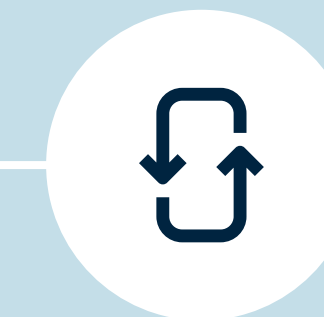
Downstream



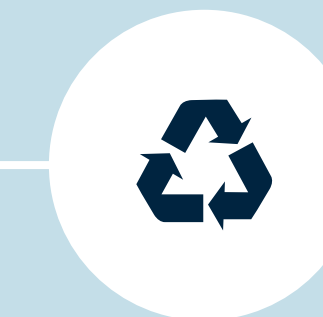
Our downstream value chain covers how customers use our services and devices in their everyday lives and business operations. It also includes the collection, reuse, refurbishment, recycling or treatment of consumer waste at end of life.



Use of services and devices by customers



Take-back, recycling and reuse of devices



Waste and end of life

The Role of the Administrative, Management and Supervisory Bodies

Governance Roles and Responsibilities

Yettel Bulgaria's Executive Leadership Team (ELT) is the highest governing body responsible for the company's strategy, operational performance and decision-making. The ELT oversees the management of material impacts, risks and opportunities and ensures that sustainability-related matters are considered in business planning and resource allocation.

Executive leadership defines business objectives, monitors progress and assigns responsibilities to ensure alignment with the operational and financial targets set by e& PPF Telecom Group, as well as with the commercial, financial and regulatory context in which Yettel operates.

The CEO and other C-suite executives oversee the company's sustainability targets, review significant impacts on stakeholders and consider stakeholder views and interests through regular management discussions and stakeholder engagement.



Bogdan Uzelac
Chief Executive Officer



Vladimir Hristov
Acting Chief Commercial Officer



Nikola Petreski
Chief Financial Officer



Hristo Tsvetkov
Chief Strategy Officer



Galina Chuleva
Chief Human Resources Officer



Frederic Nin
Chief Technology and Information Officer



Michaela Kalajieva
Chief Corporate Affairs Officer

Sustainability Governance Structure

Sustainability oversight is shared across the management team, including the CEO, Chief Corporate Affairs Officer (CCAO), ESG Manager, Core Sustainability Team, ESG Target Owners and ESG Data Owners. Material impacts, risks and opportunities are reviewed by the CCAO and Chief Financial Officer (CFO) and approved by the management team. When changes to the IROs are identified, the management team decides how they should be addressed, including any required updates to actions, responsibilities or reporting.

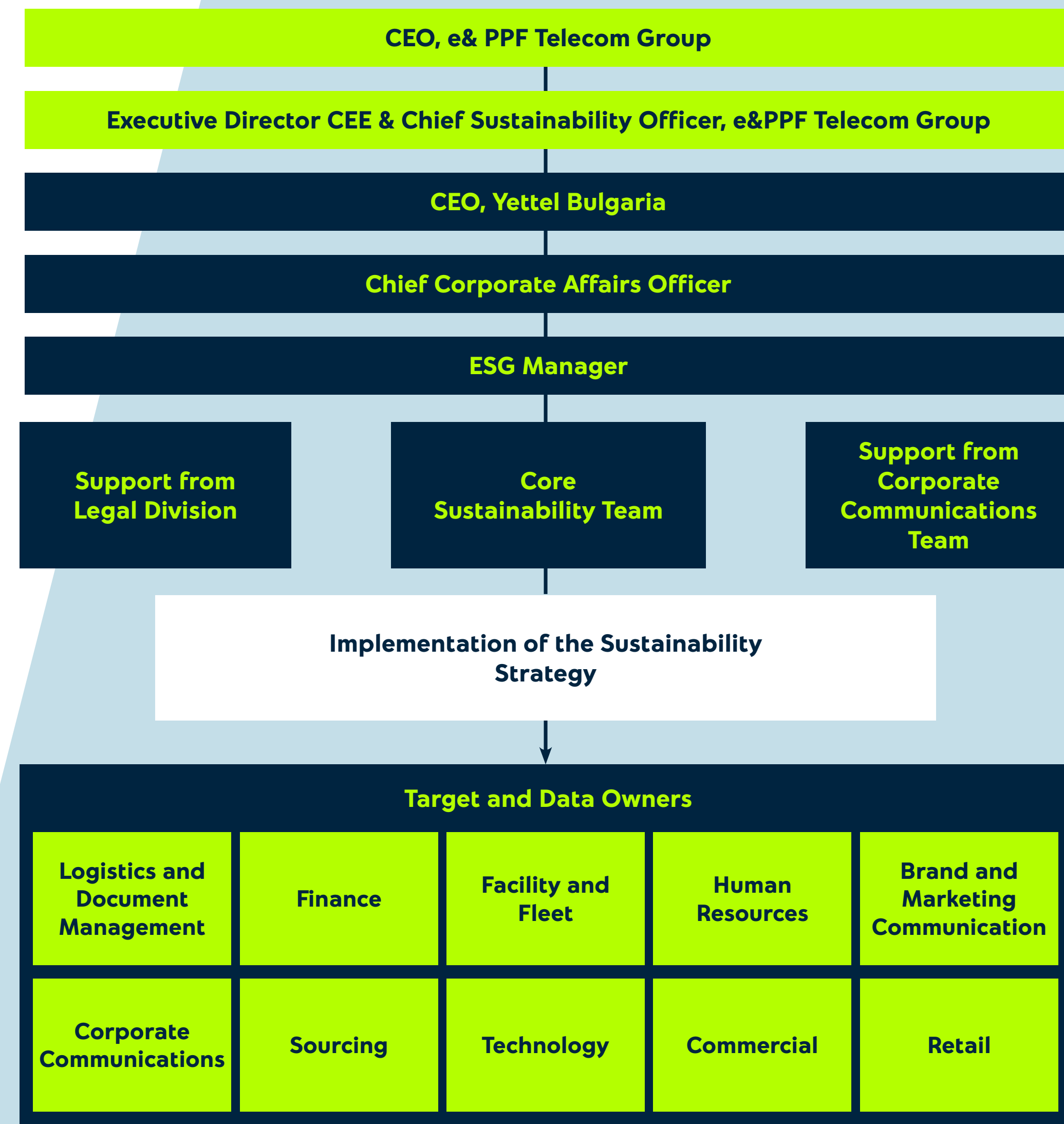
The **ESG Manager** coordinates local ESG activities and participates in strategic ESG initiatives led by e& PPF Telecom Group. The ESG Manager also oversees the sustainability data collection process, reviews and signs off the final datasets before reporting and provides relevant data to the Group ESG Manager to support alignment with Group-level requirements.

The **Core Sustainability Team** supports the ESG Manager in coordinating implementation, monitoring progress and maintaining alignment between departments. Monthly updates are provided to the ESG Manager, C-level executives and the CEO.

ESG Target Owners are responsible for implementing specific Sustainability Strategy targets within their areas of responsibility. Each target has a Target Owner and C-level oversight. Target Owners are positioned across key functions, including Logistics and Document Management, Finance, Facility and Fleet, Human Resources, Brand and Marketing Communication, Corporate Communications, Sourcing, Technology, Commercial and Retail teams. The Legal Division provides support on compliance and regulatory matters.

ESG Data Owners are responsible for the quality of data inputs used in sustainability reporting. They support accuracy, completeness and traceability by maintaining evidence and documentation. Data Owners also help ensure that data is prepared in line with relevant reporting frameworks, including GRI and ESRS.

Our **ESG Crew** supports internal engagement on sustainability through 20 employee volunteers from different departments who raise awareness of ESG topics among colleagues. Through activities and information sharing, the ESG Crew helps employees understand Yettel's sustainability goals and how individual actions can support them in practice.



Sustainability Expertise and Skills



Executive leadership has extensive experience in the telecommunications sector in Bulgaria and the wider Central and Eastern Europe region. This supports its oversight of business strategy, regulation, risk management, technology development and operational performance.

The ELT also develops its sustainability-related expertise through training. Two C-level executives have completed the ESG Academy, delivered in cooperation with Sofia University. The management team has completed a focused one-day ESG training session, tailored to their roles and responsibilities, as well as a five-module online ESG training program. Senior management has also participated in unconscious bias training.

These trainings support management's ability to oversee Yettel's sustainability impacts, risks and opportunities, including topics such as climate change, circular economy, social responsibility, corporate governance and cybersecurity. Ethics and compliance knowledge is further supported through training and information sessions on anti-corruption, bribery, ethics, privacy and security.

Sustainability knowledge is developed beyond the management team. The ESG Academy provides foundational training for Core Sustainability Team members and Target Owners, while additional topic-specific trainings are delivered internally or through external programs. This helps the teams involved in implementing the Sustainability Strategy stay informed on relevant ESG topics and apply them in their areas of responsibility.

Interests and Views of Stakeholders

We engage with stakeholders to understand their expectations and the topics that require our attention. We identify, map and prioritize stakeholder groups, and use established channels to collect feedback and exchange information.

We continue to review and improve these channels so that stakeholder views are reflected in our decisions. This helps us identify material topics, respond to expectations and strengthen long-term relationships based on trust and transparency.

Engagement of primary stakeholder groups:

Stakeholder group	Purpose of engagement	Communication channels	Stakeholder expectations	Yettel initiatives and response
Employees	- Keep employees informed about organizational changes, sustainability governance updates, policy amendments, employment conditions and benefits - Share company achievements and recognition to improve internal awareness - Give employees opportunities to contribute ideas, take part in initiatives and share views on material topics - Collect feedback through monthly engagement surveys, where employees can share comments and proposals openly and anonymously - Review survey results and define corrective measures through the responsible teams	- Digital Office application - employees can read about news and policies and participate in short surveys - Intranet SharePoint - storage for useful information and policies - Engagement portal for customer-facing employees - Channels for raising concerns - Monthly employee engagement surveys - Internal trainings, webinars and initiatives	- Career security and development - Competitive compensation and benefits - Work-life balance - Health, safety and well-being in the workplace - Respect and fair treatment	- Uphold the Code of Conduct and apply HR policies and procedures in line with applicable laws - Support career development through talent management programs, performance reviews and learning opportunities - Provide competitive salary and benefits - Maintain channels to safely raise concerns - Provide regular training on workplace behavior, compliance and employee responsibilities - Promote diversity, equity and inclusion through policies, communication and initiatives - Organize volunteering and corporate social responsibility (CSR) activities
Relatives and other employees' family members	Engage employees' family members, especially children, through initiatives that promote Yettel as an inclusive and supportive employer	- Initiatives run by Yettel - Yettel Family Day "Second Shift" career guidance program - Volunteering programs	Initiatives that foster a supportive work environment and boost employee satisfaction and connection to the company	- Educate children on the topics of sustainability, the world of technology and online safety, career guidance and others - Volunteering initiatives organized by Yettel
Customers (including private users and business customers)	- Collect regular client feedback on service quality, brand perception and performance compared with competitors - Maintain an open grievance procedure, review complaints and take follow-up action where needed - Assess client views on our sustainability initiatives and how they affect Yettel's brand perception - Discuss ESG topics and potential partnership opportunities with business clients	- Website and social media channels - Customer satisfaction surveys for mobile services customers - Feedback forms distributed through our mobile application - Retail stores and call center - Meetings with business clients	- Product quality: design, function, convenience - Service quality: responsiveness, reliability, consistency - Value for money - Data protection and privacy	- Customer centricity training to ensure higher quality customer service - Develop new services and delivery channels and offer new products - Perform feedback surveys - Maintain high standards regarding cybersecurity and data privacy protection

Suppliers (including contractors)	- Engage suppliers to comply with applicable laws and our business conduct requirements - Discuss social and environmental topics and share best practices in managing impacts of their operations	- Due diligence procedures - Channels for raising concerns - Ad-hoc meetings	- Equal and fair treatment - Transparent procurement process - Long-term relationships - Productive cooperation and shared sustainability values	- Establish a sustainable supply chain - Review and improve procurement processes and communication to meet mutual needs
Government and regulators	- Seek feedback from government and regulatory bodies when defining and validating our IROs - Engage with regulators on relevant ESG topics to exchange experience, insights and good practices - Use feedback to improve our understanding of regulatory expectations and emerging sustainability topics	- Surveys on definition of relevant IROs for Yettel - Discussions on ESG topics	- Continuity of services - Regulatory compliance - Involvement in new public policies, government initiatives and sharing best practices - Participation in local or national government initiatives	- Share best practices and research - Participate in government initiatives

Engagement of secondary stakeholder groups:

Stakeholder group	Purpose of engagement	Communication channels	Stakeholder expectations	Yettel initiatives and response
General population	- Gather feedback on our products and services and research public attitudes to better understand our audience - Identify gaps in awareness and adoption of sustainable practices - Develop solutions and campaigns that help people make more environmentally responsible choices in their daily lives	- Brand tracker surveys - Research on attitudes toward sustainable living - Research on media literacy	- Job creation - Partnerships in community development for economic, social and environmental progress - Reduction of adverse social and environmental impacts - Regular communication with local communities	- Act as a responsible community member - Provide employment and support local business - Encourage and support local community projects, partnerships, CSR programs and campaigns, including donations and advocacy
Non-governmental organizations	- Align on shared sustainability goals - Co-develop projects that contribute to positive social and environmental impacts and address key challenges	- Partnerships - Internal and external events	Continue participating in social responsibility projects and collaborating on shared societal and environmental goals	Provide volunteering programs and facilitate open sessions that allow employees to contribute to shared causes
Media outlets	- Increase public awareness of our initiatives, services and values and position the company as a leader in technology, innovation and sustainability - Raise awareness on ESG topics, inspire action within the community and build trust with stakeholders	- Events - Press releases - Interviews - ESG reports and surveys	Access, accuracy, timeliness and credibility of information	Maintain proactive communication with media outlets so that stakeholders have access to accurate and timely information about our sustainability commitments, progress and challenges



Risk Management and Internal Controls over Sustainability Reporting

Risk Management Process

Our **Risk Management Policy** sets the framework for Enterprise Risk Management across the company. The policy applies at all organizational levels and is designed as a practical tool for managers and employees when identifying, assessing and managing risks within their areas of responsibility.

Risk management is integrated into key business processes, including strategy development, performance management, investment decisions, mergers and acquisitions and major projects. Because risks can affect several functions at the same time, our process is cross-functional and involves relevant managers, the Risk Manager and subject matter experts. Significant risks are regularly monitored, with management reviewing the effectiveness of mitigation actions.

The main stages of the risk management process are risk identification, assessment and response. We use a risk matrix to assess likelihood and impact across financial and non-financial categories, including regulatory impact, reputation, health and safety and environment.

Roles and responsibilities are clearly defined. The CEO approves the Risk Management Policy and is involved in the response to significant risks, including escalation to shareholders where needed. The CFO is the policy owner and ensures that risks are identified, assessed and addressed in a timely manner. The Risk Manager provides guidance and support across the company, while line managers are responsible for embedding risk management into day-to-day business processes.

The CEO and Executive Leadership Team review strategic risks at least quarterly and decide on appropriate actions based on input from middle management, the Risk Manager and subject matter experts. The CEO reports on the strategic risks to shareholders on a quarterly basis or when escalation is required.



Risks Related to Sustainability Reporting

We acknowledge the risks associated with incomplete or inconsistent sustainability reporting, including the risk of greenwashing. Data quality risks may also arise from inaccurate inputs, manual errors and the consolidation of information from multiple systems into the corporate disclosure management system. To address these risks, we have established controls over the sustainability reporting process since 2023 that include reviews of both quantitative and qualitative information by the relevant business areas and company functions before disclosure.

Material Impacts, Risks and Opportunities



Our Double Materiality Assessment Process

Our double materiality assessment is aligned with the ESRS and the GRI 2021 Standards. The analysis covers both **impact materiality**, including our impacts on people and the environment, and **financial materiality**, related to sustainability risks and opportunities that may affect our business. Where possible, impacts, risks and opportunities (IROs) were quantified and supported by qualitative assessment.

The full value chain was considered, including upstream activities, own operations and downstream activities. The assessment involved relevant internal stakeholders, including our Risk Manager, to ensure consistency with our risk management and strategic planning processes. As our assessment process develops, some IROs may require further analysis and additional IROs may be identified and reported.

The company followed a five-step process to evaluate the materiality of sustainability issues:

Context Analysis

We examined internal and external sustainability factors by considering Yettel's business model, value chain, industry context, business relationships, geographic presence and stakeholders. We reviewed relevant internal documents and engaged experts from key business areas.

Identification of Impacts, Risks, and Opportunities (IROs)

Building on the contextual analysis, we prepared a preliminary list of potentially material topics and sub-topics. For impact materiality, we identified actual and potential impacts on people and the environment, covering both positive and negative impacts across our own operations and value chain. For financial materiality, we identified risks and opportunities that may affect Yettel's financial position or performance. These included dependencies on natural and social resources, stakeholder expectations, regulatory developments and policy changes across the value chain.

Assessment of IROs

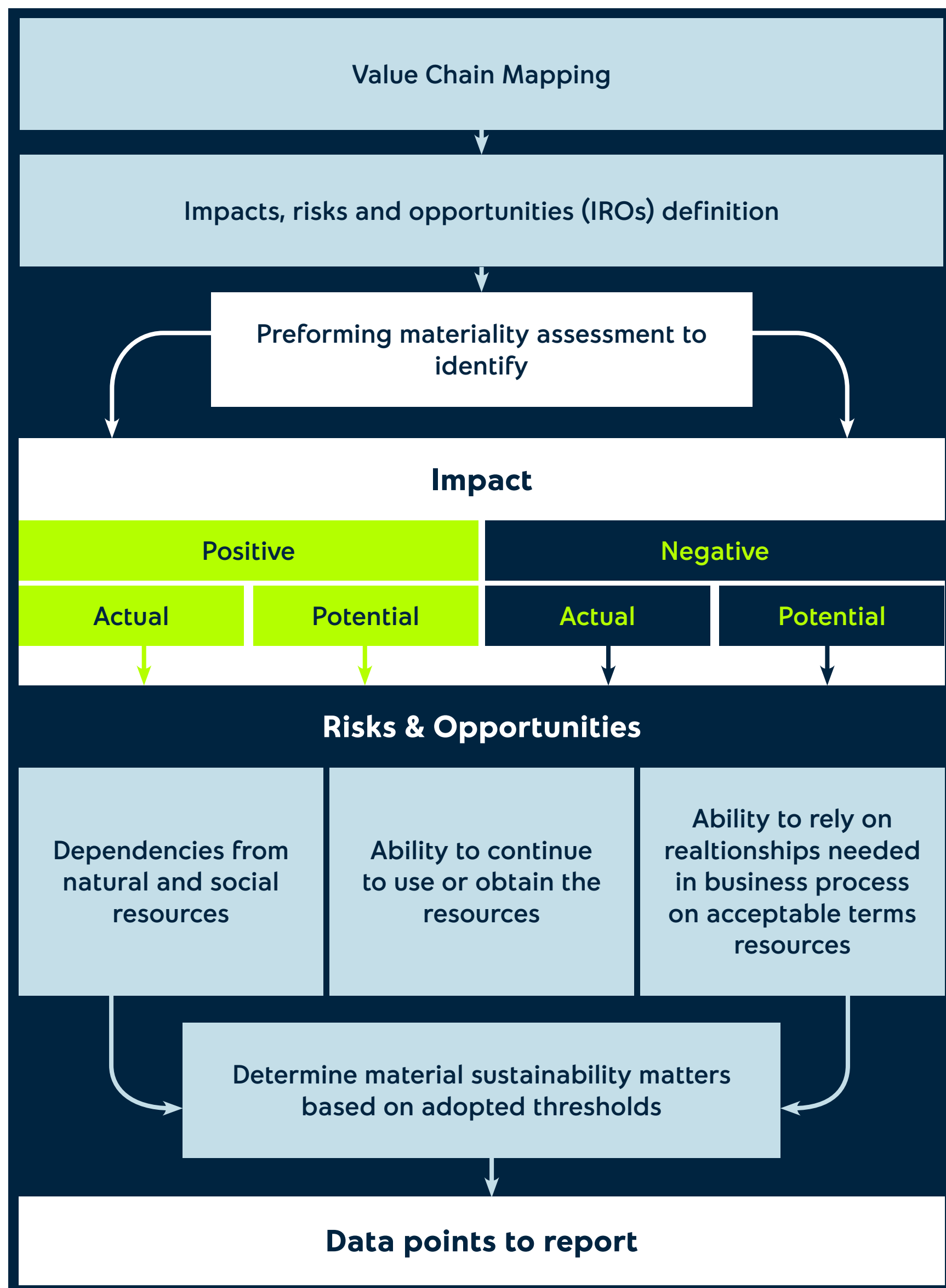
We evaluated the identified IROs from both impact and financial materiality perspectives. The assessment involved internal and external subject-matter experts and used feedback from customers, employees and other stakeholders. The analysis followed the ESRS methodology, including assessment of severity/magnitude and likelihood, to ensure a consistent and structured process.

Definition of a Materiality Threshold

Each IRO was assessed against predefined materiality thresholds. IROs above these thresholds were categorized as material. These thresholds may be adjusted in future assessments as our methodology develops further.

Validation with Management

The findings were validated with experts, managers and other involved parties locally. The results were then reviewed and endorsed by Yettel's senior management to ensure alignment with the company's strategy and priorities.



Alignment with Strategy and Business Model

Our double materiality assessment identified the following material sustainability topics:



ESRS E1
Climate Change



ESRS E5
Resource Use and Circular Economy



ESRS S1
Own Workforce



ESRS S2
Workers in the Value Chain



ESRS S4
Consumers and End-users



ESRS G1
Business Conduct



Entity - specific topic
Cybersecurity

These material topics and related IROs are linked to our strategy, business model and operations, with further information on this alignment provided in the “**Business Model, Strategy and Value Chain**” section and in the respective chapters for each material topic.

Yettel develops its 5-year Strategic Plan through a process involving all company functions. The plan considers stakeholder needs, market developments, the results of the double materiality assessment and other factors that may affect our company. As part of this process, key strategic risks are identified and mitigation measures are defined, reviewed with relevant stakeholders and approved by the Group. After the Strategic Plan is finalized, executive leadership reviews key risks and mitigation measures at least once per quarter.

Reducing Our Environmental Footprint

Climate Change

Governance and Strategy

Our climate change governance is structured around clear roles and responsibilities across management and operational levels. Overall accountability sits with the CEO, who approves our **Environmental and Energy Management Policy** and ensures that sufficient resources are allocated for their implementation. The Chief Corporate Affairs Officer supports this by aligning climate priorities with senior management and integrating them into business operations. Day-to-day coordination, monitoring and reporting are led by the ESG Manager, who tracks progress and works with different departments to ensure consistent implementation. At the operational level, teams are responsible for managing emissions across Scope 1, 2 and 3, while the broader ESG framework - covering the ESG team, target owners and data owners - supports execution, data collection and reporting. This structure ensures that climate considerations are embedded in decision-making, risk management and company strategy, supporting our ambition to reduce our carbon footprint while enabling people to stay connected.

Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
Purchased electricity and heat used to power network infrastructure and technology centers lead to upstream emissions	⊖ Negative impact	⬆️ Upstream	🕒 Short-term
Upstream GHG emissions generated from the procurement of purchased goods, network services and materials - including electronic devices, infrastructure equipment, cables, and construction inputs - due to energy-intensive extraction, manufacturing, transportation and supply chain processes, increase the company's overall carbon footprint	⊖ Negative impact	⬆️ Upstream	🕒 Short-term
The use phase and end-of-life treatment of sold products generate downstream GHG emissions	⊖ Negative impact	⬇️ Downstream	🕒 Short-term
Regulatory and target-related risk from fuel-related GHG emissions, including failure to meet emissions reduction targets or comply with climate regulations may lead to fines, penalties or legal action	⚠️ Risk	⬆️ Upstream	🕒 Short-term
Financial risk from higher operating costs linked to carbon taxes, cap-and-trade schemes and potential increases in energy prices or limitations in energy supply	⚠️ Risk	⬆️ Upstream ⚙️ Own operations	🕒 Short-term
Reputational risk if the company is perceived as contributing to climate change or not taking sufficient action to reduce emissions from its operations	⚠️ Risk	⬆️ Upstream	🕒 Short-term
Implementation of 5G solutions which are more energy efficient and can reduce the carbon footprint in the value chain	✅ Positive impact	⬆️ Upstream ⬇️ Downstream ⚙️ Own operations	🕒 Short-term

Policies

Our climate change approach is governed by the **Environmental and Energy Management Policy, Sustainability Policy** and **Climate Change Policy**. The **Sustainability Policy** sets the overall ESG framework and supports the company's commitment to reducing its environmental footprint. The **Climate Change Policy**, introduced in 2025, focuses on reducing GHG emissions, improving energy efficiency and strengthening resilience to climate-related risks. It applies to operations, products, services and value chain activities, covering Scope 1, 2 and 3 emissions.

Our **Environmental and Energy Management Policy** is aligned with relevant international standards, including **ISO 14001** for environmental management and **ISO 50001** for energy efficiency, which support monitoring, performance improvement and more effective management of environmental and energy-related impacts.

Actions

Climate Transition Plan

As part of e& PPF Telecom Group, Yettel supports the Group's climate transition plan, which aims to reduce GHG emissions, manage climate-related risks, and align business operations with the Paris Agreement and the EU climate neutrality objective for 2050. The Group's emissions reduction targets were validated by the **Science Based Targets initiative** in early Q1 2025, confirming that the transition plan is aligned with a 1.5°C pathway.

e& PPF Telecom Group's 2030 Reduction Goals

Absolute **Scope 1** and **Scope 2** emissions

by **42%**
compared with a 2022 base year



Absolute **Scope 3** emissions from purchased goods and services, capital goods and fuel- and energy-related activities

by **25%**
compared with a 2022 base year

Yettel is focused on improving the energy efficiency of operational assets, increasing the use of renewable electricity and supporting measures such as renewable energy certificates, direct renewable energy procurement, where feasible, and on-site renewable energy generation. Additional opportunities, including energy storage and fleet electrification, are also being assessed as part of the Group's decarbonization approach.

Beyond operational emissions, Yettel supports efforts to address value chain emissions, particularly those related to purchased goods and services, capital goods, electronic devices, network equipment and customer-facing products. Supplier engagement and the collection of supplier carbon footprint data help improve GHG emissions calculations and support more informed procurement decisions.

Through these actions, Yettel supports the Group's climate strategy and long-term decarbonization across its operations and the value chain. Our ambition is to reduce our carbon footprint while enabling people, businesses and society to stay connected.

Climate Risk Assessment

To support the development of the transition plan, the Group carried out a climate risk analysis of our operations and assets, including stores, warehouses, offices and headquarters. The assessment covered both physical risks and transition risks related to policy, legal, technology, market and reputational changes. We evaluated asset exposure and vulnerability using data on location, construction characteristics, energy consumption, emissions, asset value and business relevance. The time horizons were selected to reflect the expected technical and useful lifetime of assets, strategic planning cycles and capital allocation plans.

Physical Risks

For physical climate risks, the analysis covered two time horizons:

- medium term, from 2025 to 2030
- long term, from 2030 to 2050

We modelled three Representative Concentration Pathways (RCPs) combined with Shared Socioeconomic Pathways (SSPs): RCP2.6-SSP126 as the optimistic or low scenario, RCP4.5-SSP245 as the pessimistic or medium scenario, and RCP8.5-SSP585 as the no breakout or worst-case scenario.

RCP2.6-SSP126 assumes lower atmospheric carbon dioxide concentrations and stronger climate action. RCP4.5-SSP245 reflects a pathway with more limited climate policy action, while RCP8.5-SSP585 represents a high-emissions scenario that could occur without major regulatory measures and interventions.

In total, we evaluated **10 major climate hazards**, further broken down into **51 partial indicators** and **81 climate risk indicators**.

Transition risks

Transition risks were assessed across three time horizons and using two International Energy Agency scenarios: the Net Zero Emissions by 2050 Scenario, representing a pathway aligned with limiting global warming to 1.5°C, and the Stated Policies Scenario, which provides a more conservative benchmark based on existing and announced policies, without assuming that all government climate and energy targets will be achieved.

	Type	Aspect	Description
Physical risks	Acute	Drought and heat stress	The assessment shows increased exposure to drought conditions, particularly in future scenarios. This could affect cooling systems for network equipment and data centers, impacting operational efficiency and increasing energy costs. Heat stress was identified as the costliest climate hazard
	Acute	Flood	Some assets may be at risk of flooding, which could damage equipment and disrupt services. The analysis projects fluvial flooding costs in both the medium and long-term
	Acute	Extreme weather	Blizzards and strong wind gusts may damage towers and cables, causing local outages of mobile and internet services Yettel provides
	Chronic	Temperature	Rising average temperatures may lead to increased cooling demands for network infrastructure and facilities, potentially straining energy resources and increasing operational costs. Cooling requirements are expected to generate considerable costs in the medium and long-term
Transition risks	Policy and legal	Carbon pricing and emissions regulation	Climate policies and mechanisms such as the EU ETS can increase energy and materials costs. Although Yettel is not directly covered by the EU ETS, these cost pressures may indirectly affect our operations and long-term profitability as Europe continues its transition toward its net zero target
Opportunities	Resource efficiency	Energy-efficient infrastructure	We expect energy costs to rise alongside technological development. Energy efficiency measures (e.g. cooling systems and low-power network equipment and data centers at CETIN) could therefore deliver significant cost savings
	Products and services	Green digital services	If a climate-conscious scenario prevails, customers will become more sensitive to offerings with a lower environmental impact. Providing such products or services could increase our long-term revenue
	Markets	Access to green finance	Improving our ESG performance may qualify us for sustainability-linked loans or green bonds. As these typically offer more favorable conditions, this could lower our financing costs

The analysis helps us identify where preventive measures, investment or closer monitoring may be needed. To allow climate-related risks to be considered alongside other business risks, we plan to integrate the results of the assessment into the Group's enterprise risk management framework.

Our GHG Emissions Performance

Since 2022, we have calculated our GHG emissions to track energy use and emissions across our operations. Our methodology follows the GHG Protocol and is aligned with the European Sustainability Reporting Standards (ESRS). In 2025, as part of an e& PPF Telecom Group effort, we worked to strengthen data accuracy, transparency

and consistency. Where available, we used more specific emissions data, including product-level information declared by manufacturers for selected Scope 3 categories. Where supplier-specific data was not available, we applied recognized emission factors to ensure full coverage of relevant emissions sources.

Scope 1 & 2 Emissions

Our objectives follow the Group target to reduce Scope 1 and 2 emissions by 42% by 2030, compared with 2022 levels, and achieve carbon neutrality by 2050 or sooner. Scope 1 and 2 emissions account for around 0.6% of our total carbon footprint but reducing them remains an important part of our decarbonization efforts.

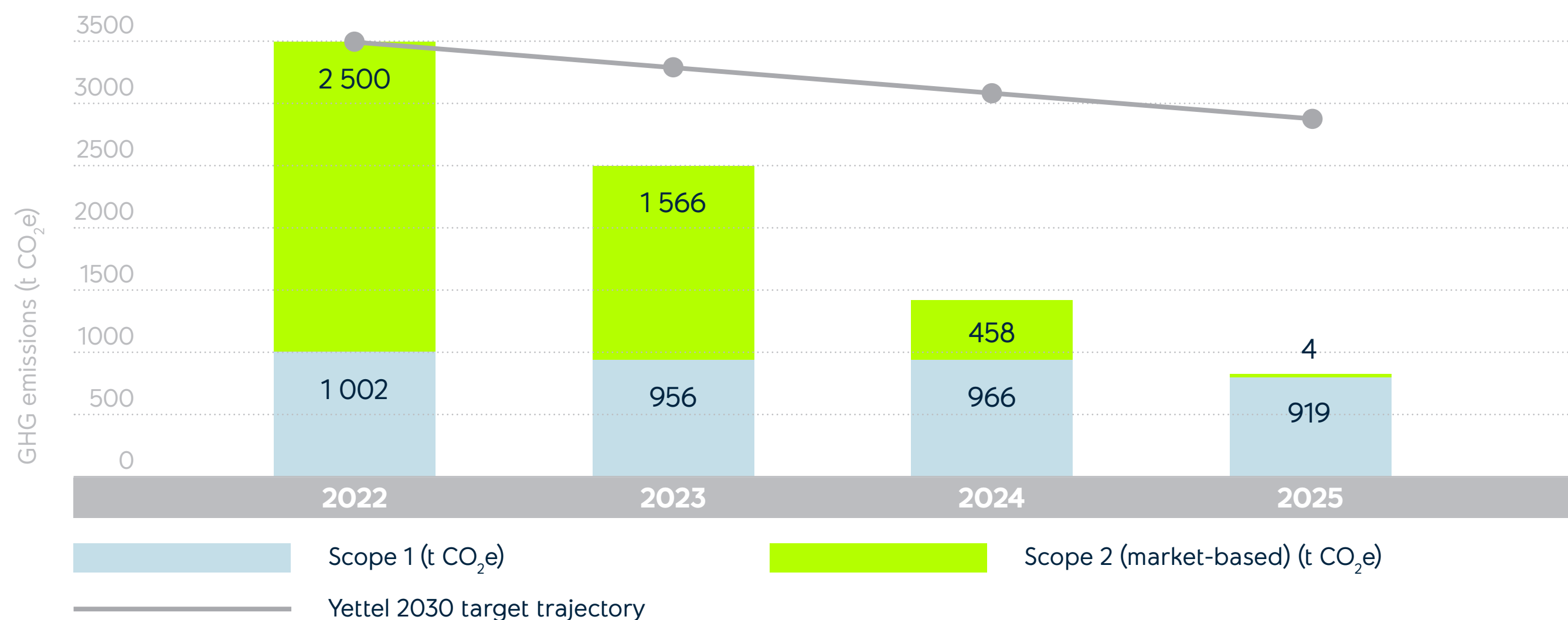


Figure 2

Scope 1 and 2 GHG emissions, alongside our 2030 target trajectory (market-based) (t CO₂e)



We reduced our absolute Scope 1 and 2 market-based emissions by 74% compared with the 2022 base year, surpassing our Group's target of a 42% reduction by 2030



We reduced Scope 2 emissions by 99% compared to our 2022 base year, as a result of renewable electricity sourced through our Power Purchase Agreement and the purchase of renewable energy certificates

We have been outperforming the Group's emissions reduction trajectory, with the main progress achieved in Scope 2 emissions. This has been driven primarily by the use of renewable electricity through our **10-year Power Purchase Agreement** which contributed to a 44% reduction in our Scope 1 and 2 emissions compared to 2022. During the reporting year, we also purchased **Guarantees of Origin**, reducing our market-based Scope 2 emissions from purchased electricity to zero.

In addition, the **photovoltaic system (PV)** installed on the roof of our building managed to produce 37 MWh of renewable energy in 2025.

Group climate target

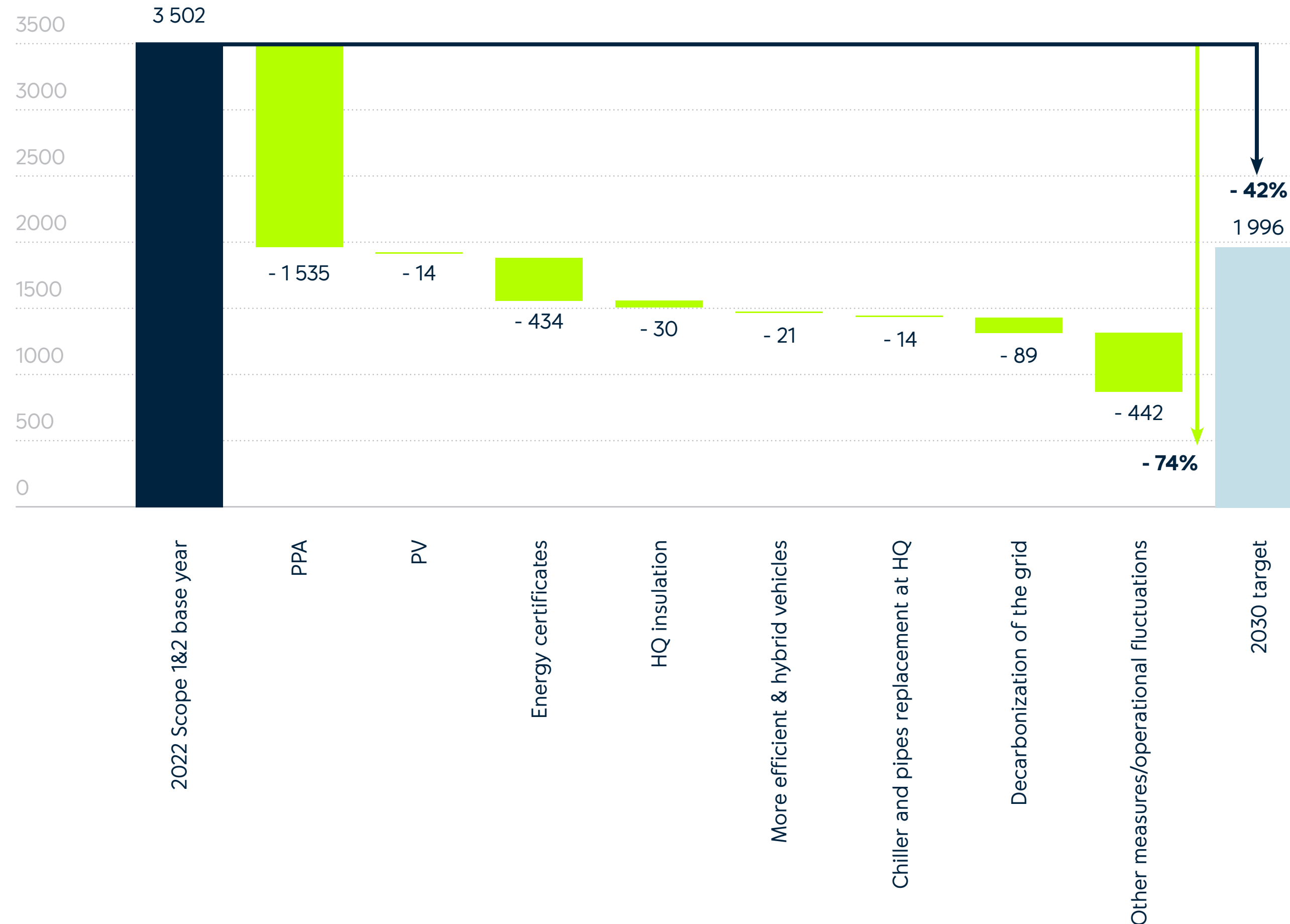


Figure 3

Yettel decarbonization levers and their contribution to achieve our Group-level GHG emission reduction target (t CO₂e)

Since 2022, we have been implementing a **continuous improvement process across our facilities to increase energy efficiency**.

We have introduced LED lighting in our stores, offices, warehouse, repair center and headquarters. We have also installed an energy-efficient cooling and heating system, replaced chillers and refrigerants in our central facility and introduced more efficient air conditioning units. At Yettel's headquarters, we operate a Building Management System with smart controllers, which enables better monitoring and control of energy consumption.

This year we implemented an additional energy efficiency measure at our headquarters by **installing specialized sun-proof insulation foil across the building's glass façade**. The project was based on a 2024 energy efficiency audit, which identified the building structure as a major source of energy loss. Instead of replacing the full façade, we selected a more cost-effective solution to reduce heat and sunlight penetration, improve thermal performance and lower electricity consumption from heating, ventilation and cooling systems. The project delivered energy savings of over 78 000¹ kWh equivalent to 30 t CO₂e, which are expected to double in 2026.

In the beginning of 2025, we officially acquired **ISO 50001 Energy Management System** across Yettel operations, including our headquarters, administrative offices, warehouse, repair center and retail stores. The system provides a framework for improving energy performance, monitoring consumption and supporting our decarbonization efforts.



Our progress is reflected in e& PPF Telecom Group's CDP rating, which improved from B in 2023 to A- in 2024 and remained at A- in 2025.

¹ This is a preliminary result based on five months of data and will require 12-24 months of monitoring to confirm full-year savings.

Scope 3 Emissions

As a telecommunications company, our largest climate impacts are in the value chain, with Scope 3 accounting for approximately 99% of total GHG emissions over the reporting period. Our Group target is to reduce Scope 3 emissions by 25% by 2030 compared with 2022 levels. This target covers emissions from Purchased Goods and Services, Capital Goods, and Fuel- and Energy-Related Activities, which together represent about 98% of total Scope 3 emissions of the Group.

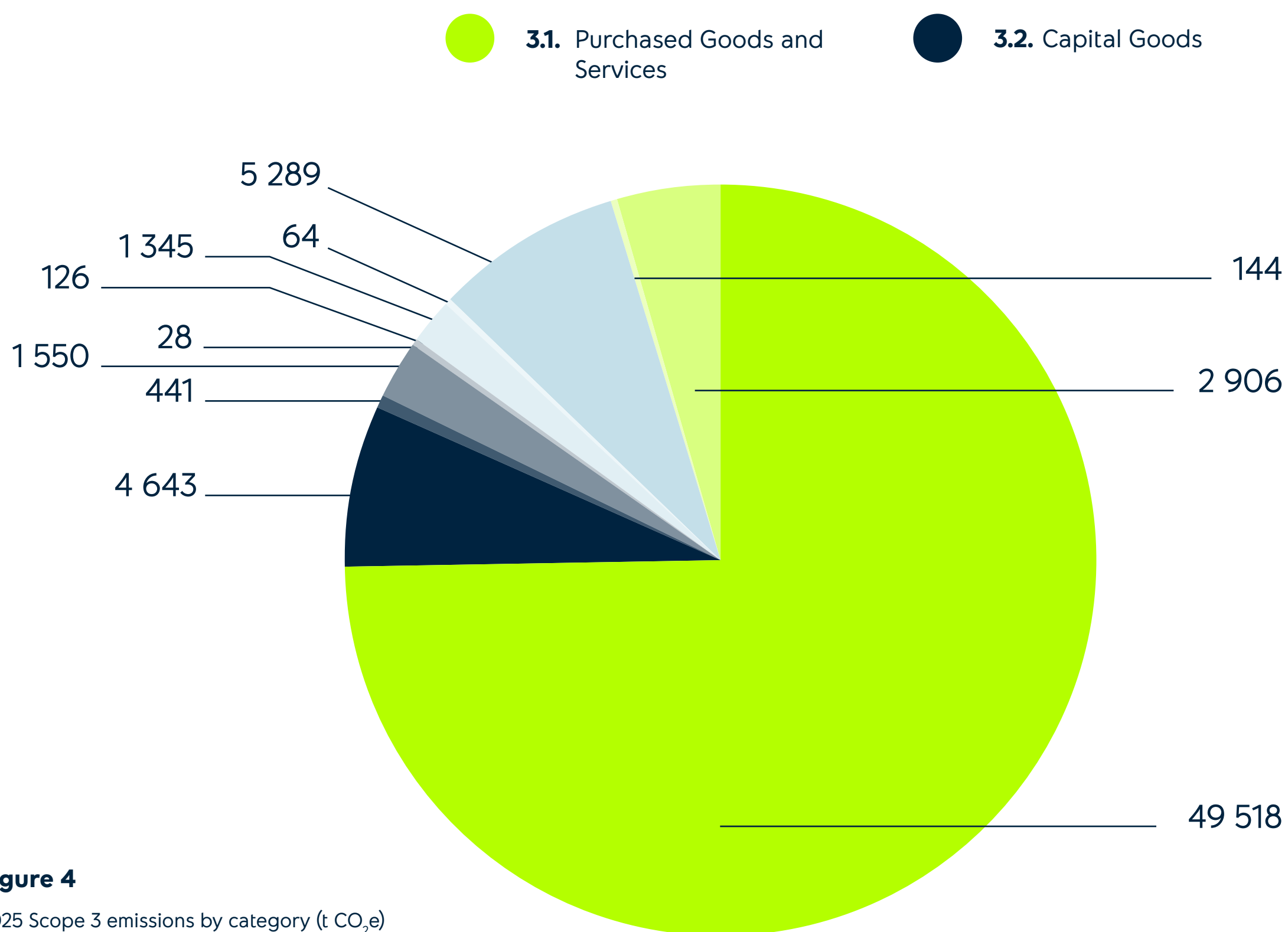
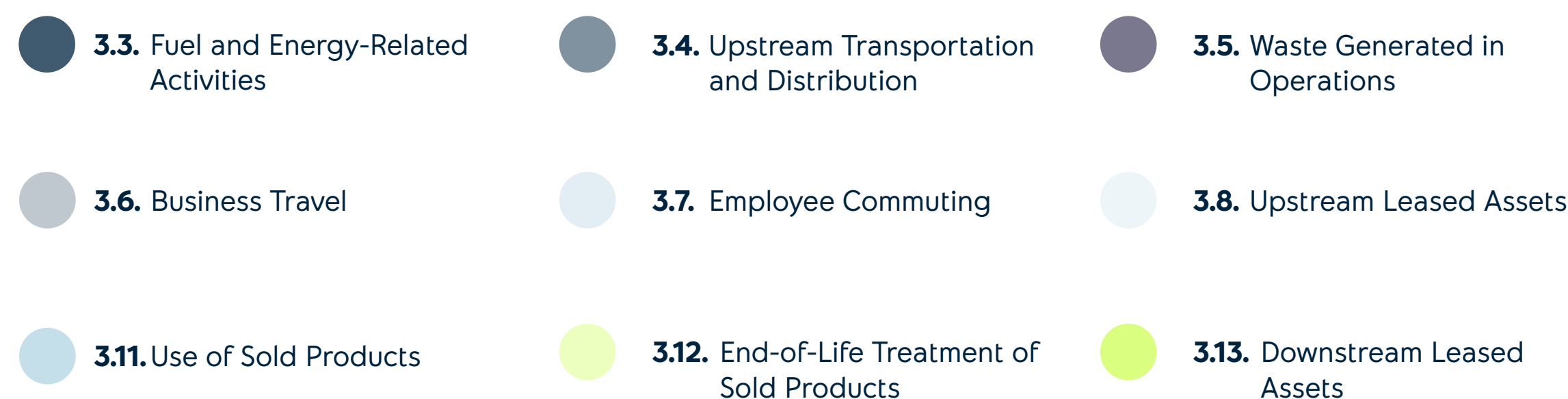


Figure 4

2025 Scope 3 emissions by category (t CO₂e)

Scope 3 emissions are mainly concentrated in **Purchased Goods and Services**, which account for approximately **75%** of total Scope 3 emissions. The next largest categories are **Use of Sold Products at 8%** and **Capital Goods at 7%**. All other Scope 3 categories have smaller shares, generally between 0% and 5%, showing that **most value chain emissions come from procurement-related activities and the use phase of sold products**.



We updated our Scope 3 calculation methodology this year to improve accuracy and better reflect actual products, suppliers and device characteristics. The main changes included a shift from spend-based calculations to product-based data, increased use of product and supplier-specific emission factors and more accurate power consumption data from sold products. As prior-year figures have not yet been recalculated using the updated methodology, **2025 Scope 3 emissions are not directly comparable with previous years**. In light of these methodological improvements, the Group plans to conduct a full re-baselining of its GHG inventory in 2026 and will then assess whether its SBTi targets need to be reset in accordance with SBTi's restatement criteria.

Resource Use and Circular Economy

Governance and Strategy

As a telecom company, Yettel's circular economy approach focuses on reducing waste, increasing reuse and recycling, extending product lifecycle and promoting more sustainable consumption by engagement with employees, customers and suppliers.

The CEO holds overall accountability for circular economy performance including approving the circular economy framework, setting expectations for its implementation, ensuring that relevant functions have the resources needed to deliver planned actions, and reviewing progress against targets.

The Chief Corporate Affairs Officer supports alignment with senior management and integration into business operations. The ESG Manager coordinates implementation, monitoring, reporting and cooperation with relevant teams.

Implementation is supported by ESG Target Owners and ESG Data Owners, who define action plans, manage projects, collect data and ensure reporting accuracy. Key teams involved include Device Value Chain, Fleet and Facility, Shop Evolution, Document Management and Logistics and Product Management.

Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
Raw material extraction for new products and devices contributes to natural resource depletion and increases reliance on primary materials	⊖ Negative impact	⬆ Upstream	🕒 Short-term
Generation of e-waste and hazardous waste, packaging materials, pallets and sold accessories, can contribute to pollution and resource depletion if not properly collected, treated, reused or recycled	⊖ Negative impact	⬆ Upstream ⚙ Own operations ⬇ Downstream	🕒 Short-term
Implementation of e-billing solutions helps reduce paper waste	⊕ Positive impact	⚙ Own operations ⬇ Downstream	🕒 Short-term

Policies

- Our **Sustainability Policy** sets the framework for our Sustainability Strategy 2028, including responsible resource use and waste management.
- Circular economy principles are further defined in our **Circular Economy Policy**, which focuses on waste reduction, resource efficiency, recycled and secondary materials, longer product lifecycles and initiatives that promote reuse, recycling and more sustainable consumption.
- Supplier-related impacts are addressed through our **Sustainable Sourcing Policy**, which integrates ESG criteria into supplier selection and promotes more sustainable practices across the supply chain, including resource use and waste management.



Actions

Promoting Longer Device Use

Digital services depend on physical devices, equipment and packaging, which require raw materials and eventually become waste. We focus on extending device lifecycles to reduce the need for new resources, repairing and refurbishing equipment for reuse and recycling devices that can no longer be used to recover valuable materials and ensure proper treatment of hazardous components. By keeping devices and equipment in use for longer, we help customers get more value from the products they purchase from us.



Through our initiatives, we help customers identify problems earlier, keep devices in use for longer and make more informed decisions about repair, replacement and end-of-life treatment.

Our **Smartphone Universe** initiative supports longer device lifecycle by offering a flexible extended warranty for smartphones, insurance options, access to certified repair services and the **Smartphone Diagnostic** service. Available through the Yettel app, this digital tool assesses smartphones and tablets and helps users keep their devices in good condition.

By offering an extended warranty of up to three or four years with select subscription plans, alongside professional repair services, we aim to prolong device lifespans. This reduces the demand for new devices and conserves valuable resources, including energy and more than 70 precious metals used in smartphone manufacturing.

To support reuse, we continued the **Customer Premises Equipment (CPE) repair program**, through which returned routers and set-top boxes are repaired and placed back into use.



New and favorably

- Smart offers
- Flexible payment
- Voucher for an accessory

Longer together

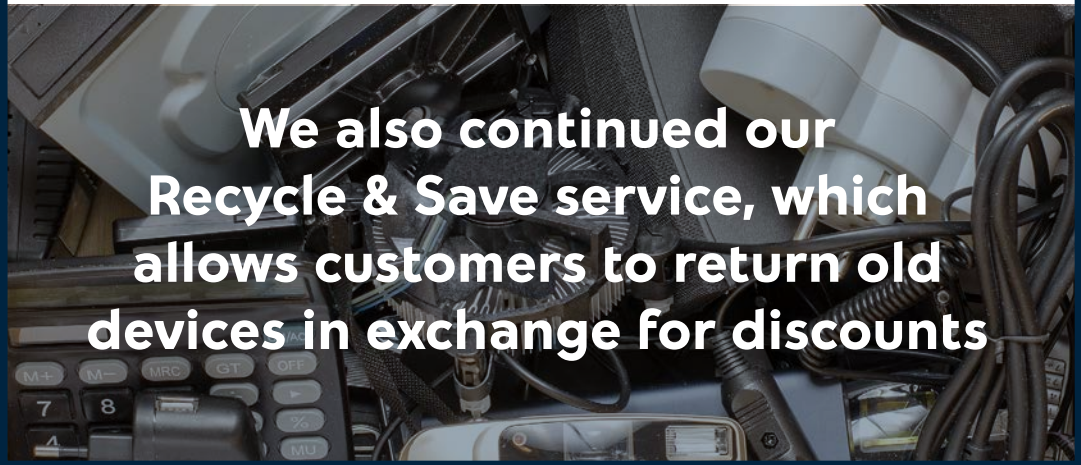
- Insurance Smartphone protect
- 4 years warranty
- Certified service

Time to change

- Recycle and Save
- Return and get a new one discount

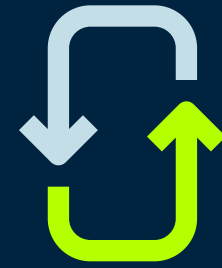
75 343

routers, modems and set-top boxes were refurbished and returned to use through the CPE repair program from 2022 to 2025



We also continued our Recycle & Save service, which allows customers to return old devices in exchange for discounts

B2B Devices Buy-Back program



To meet a clear need among corporate clients, we launched Bulgaria's first telecom-led B2B Device Buy-Back service to expand our circular reuse options. Internal research showed that **nearly half of businesses stored unused smartphones and tablets**, while only a small share recycled them.

Developed in partnership with Swipe.bg, the program gives business customers an easy way to return old devices for market valuation, refurbishment, reuse or responsible recycling, as we manage the process end to end, including logistics, coordination and customer support. The service helps companies recover value from unused assets and reduce e-waste, supporting their sustainability goals while making circular technology use part of Yettel's business offering.

Within the first months of the service, more than 400 devices were collected. Over 100 were returned for reuse and more than 300 were sent for recycling. Based on an indicative estimate, each processed device saves around 2.8 kg CO₂e.

Waste Management

This year we generated 184 tons of waste. Of these 129 tons **(70%) were diverted from disposal** mainly through recycling and reuse, while 55 tons (30%) were directed to disposal, primarily landfilled. The largest share was non-hazardous waste, at 153 tons or 83% of total waste, while hazardous waste accounted for 31 tons or 17%.

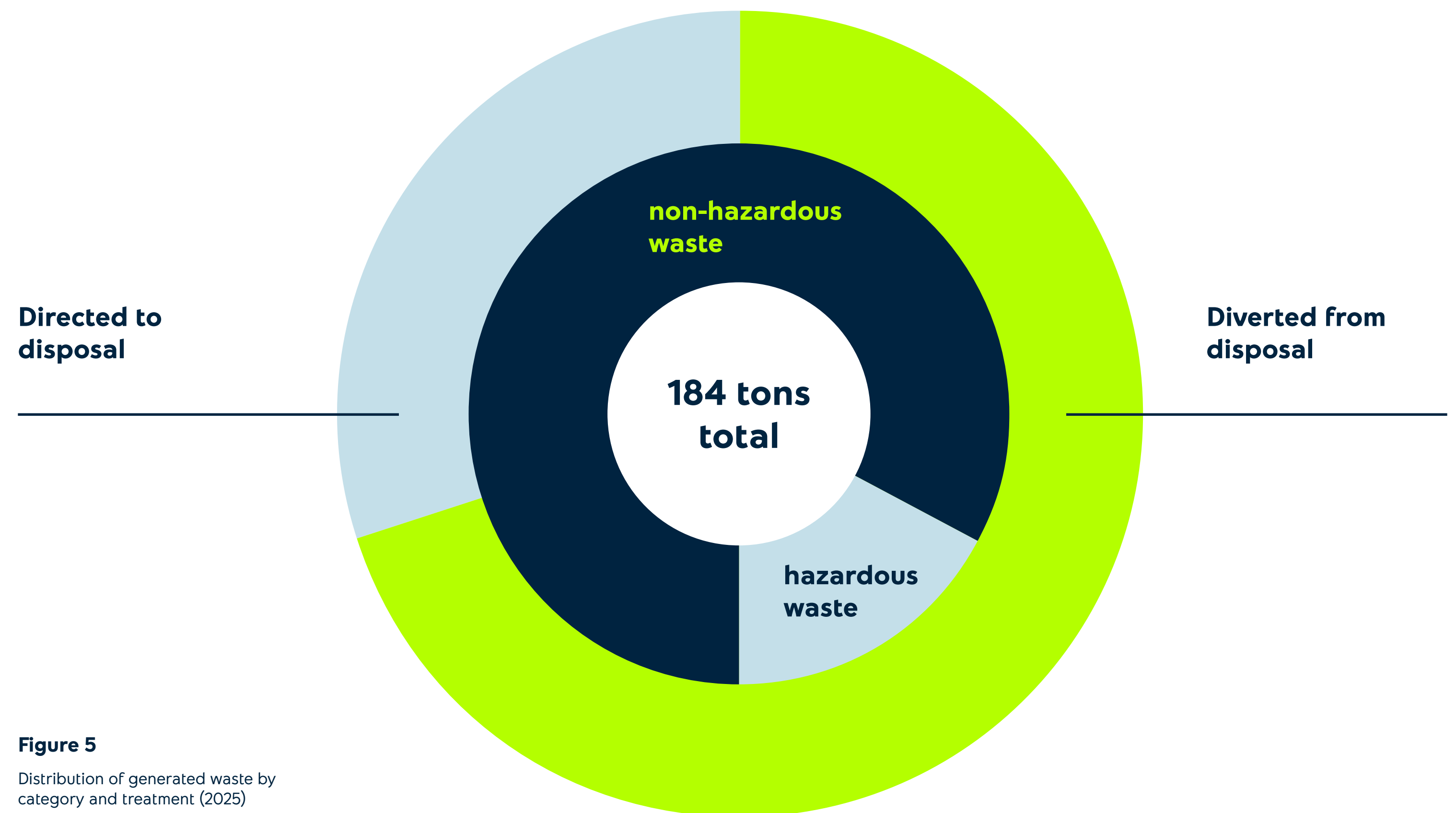


Figure 5

Distribution of generated waste by category and treatment (2025)

Reaching People on Sustainable Living

Collection services alone cannot address e-waste if people are unaware of how and where to return old devices. We therefore use campaigns, partnerships and educational initiatives to make responsible consumption and waste management easier to understand and apply in practice.

Let's Clean Bulgaria

This year we partnered with bTV's nationwide "Let's Clean Bulgaria" initiative to address the growing environmental impact of e-waste and further enhancing public awareness around recycling. Recognizing the initiative's strong media presence as an opportunity to reach a wider audience, we used the campaign to educate the public about responsible e-waste disposal and to encourage people to recycle old devices at Yettel stores. To strengthen the message, Yettel positioned its ESG manager at the forefront of the conversation through TV appearances, supported by TV and digital content, influencer participation, social media communication, in-store displays across Yettel shops and PR articles.

The campaign reached 2.7 million views nationwide through TV, digital, in-store and PR channels, exceeding our annual target of 2.5 million views achieved on sustainable living. This supports our 2028 strategic goal and helps raise awareness around proper waste management, while strengthening Yettel's role in helping society make more informed choices on topics directly linked to our business and expertise.



In 2025, we reached more than 2 700 000 views on sustainable living across our channels

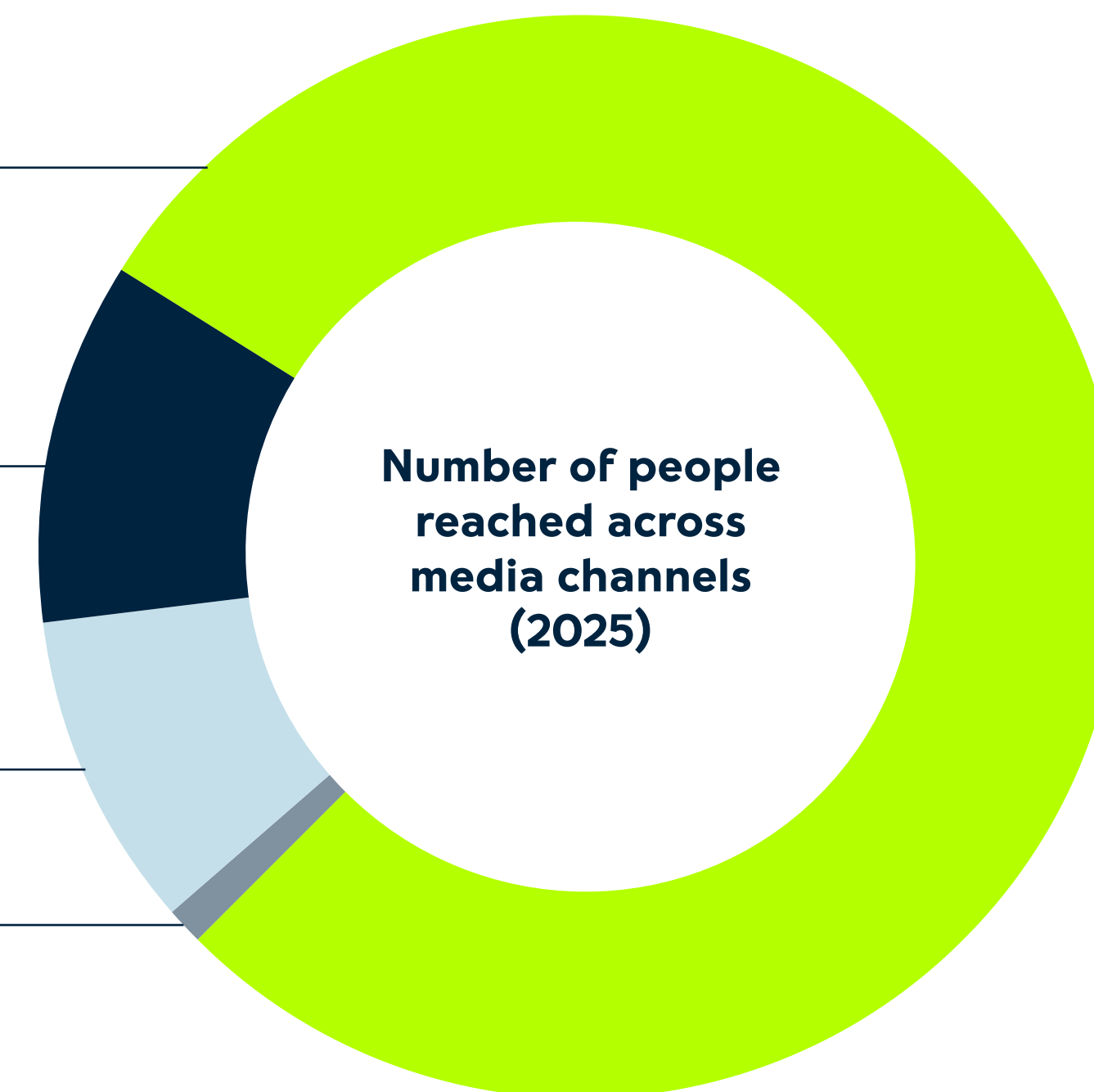


2,171,000

301,673

255,000

5,000



- Television
- In-Store Presence
- Public Relations
- Digital Channels

Figure 6
Amount of views achieved across media channels (2025)

Packaging Waste

As part of our efforts to reduce waste generation, we identified packaging waste as an area where our actions can make a difference. We therefore set a strategic target to reduce packaging waste from our own operations by 40% by 2028, compared with 2021, bringing quantities down to 8 605 kg.¹ in the last year of our target.

Although packaging waste peaked in 2023 due to improved data visibility, we have since reversed this increase, reducing waste to 11 878 kg. for the reporting year - 17% below the 2021 baseline and closer to our target pathway.

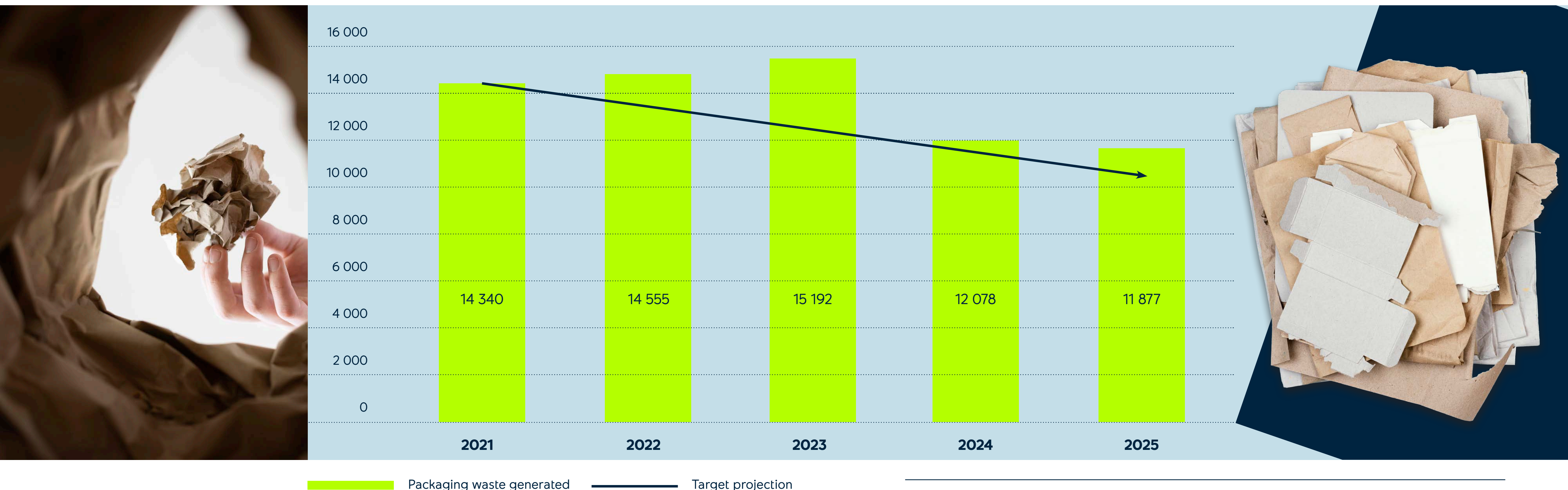


Figure 7

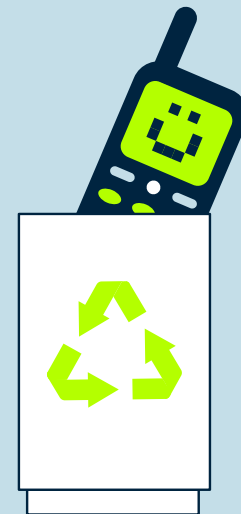
Annual packaging waste generation and target projection, 2021-2025 (kg.)

¹ Following an internal data audit, the 2021 baseline and historical data were restated to correct a methodological discrepancy. Packaging waste is now calculated based on materials issued and dispatched from warehouses, rather than materials received into inventory, resulting in a corrected 2021 baseline of 14 340 kg. Figures exclude e-shop shipping boxes, as data for this waste stream is still being finalized and will be included in future reporting to ensure complete coverage of packaging waste from our operations.

E-waste Collection Initiatives

To improve recycling, we maintained in-store e-waste collection bins, customer return programs and employee collection campaigns.

The top three cities by collected e-waste per capita during 2025 were Gotse Delchev, Novi Pazar and Balchik.



Between 2022 and 2025, Yettel prevented 159 662 kg. of devices, accessories and batteries from becoming waste, exceeding the strategic cumulative target of 127 000 kg. until 2028 ahead of schedule, overachieving by 32 662 kg.

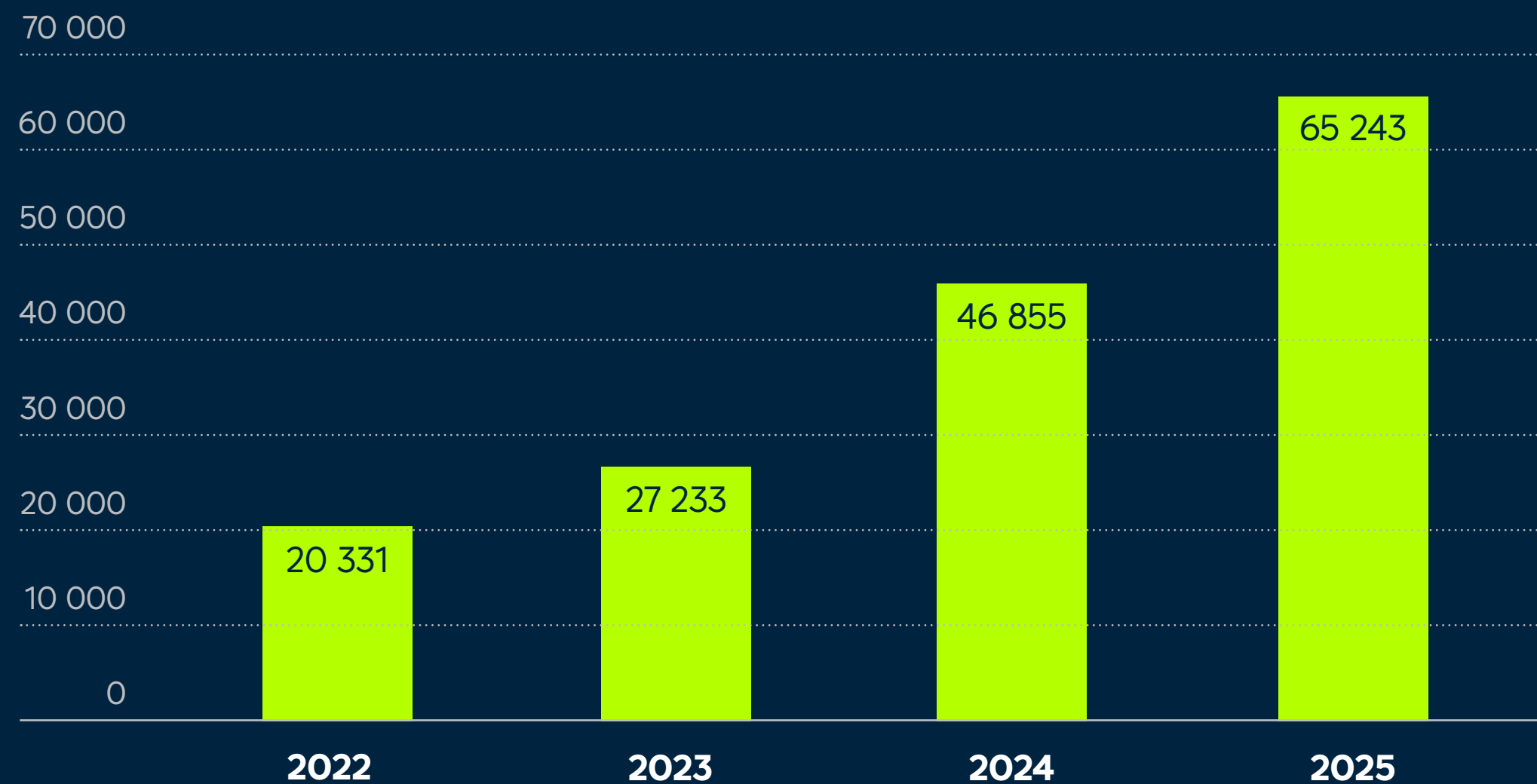
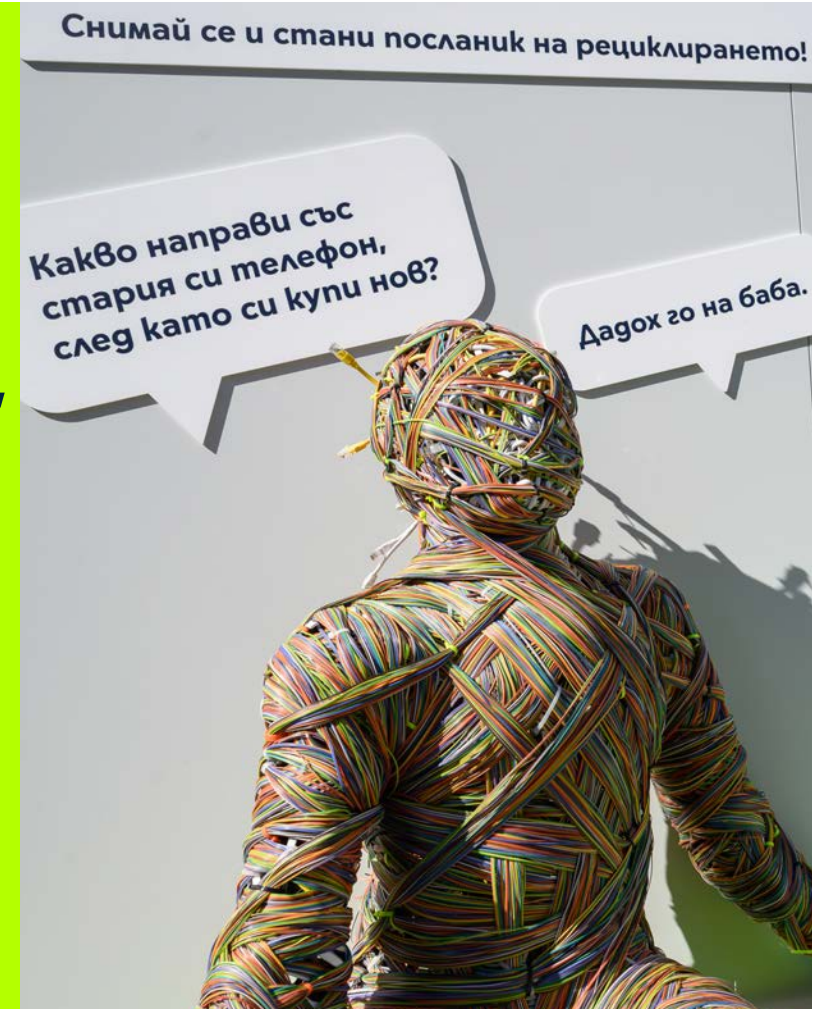


Figure 8

Annual amount of collected e-waste, 2022 - 2025 (kg.)

Yettel Recycler

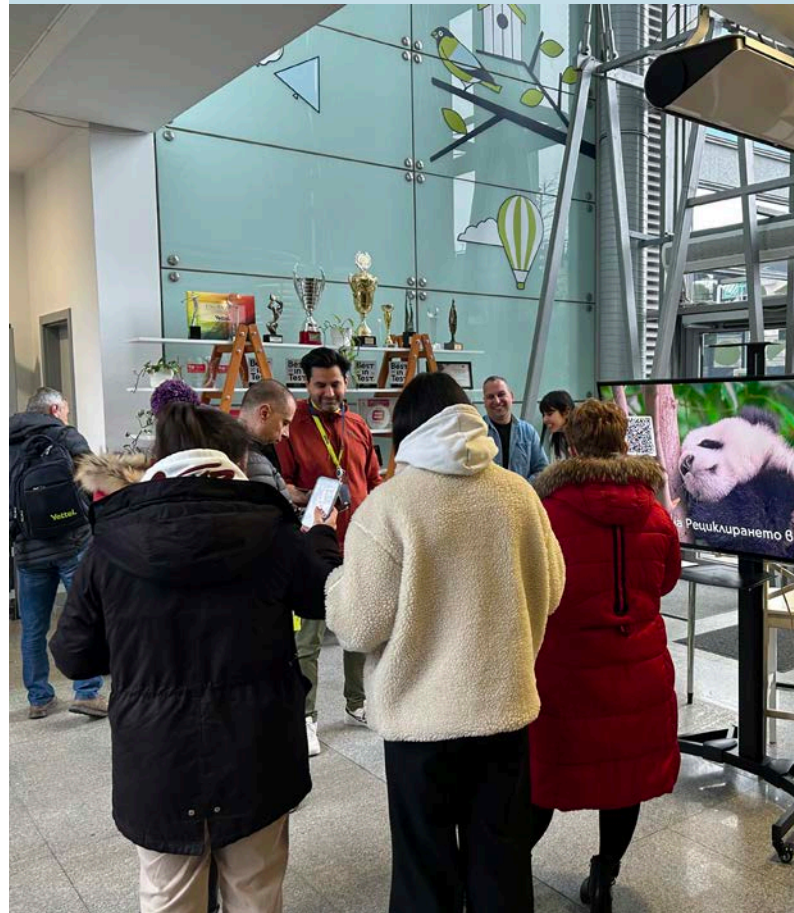
In 2025, we also used public awareness formats such as the Yettel Recycler, an interactive installation dedicated to e-waste, to make the topic more understandable and encourage people to return unused devices instead of keeping them at home or disposing of them incorrectly. Over the course of several months, the Recycler visited three Bulgarian cities: **Blagoevgrad, Gabrovo and Burgas**. At each stop, our team actively engaged with the public and collected old, unwanted electronic devices for proper disposal.



The 2025 Yettel Recycler tour reached **over 4 200 people** and collected **240 kg.** of e-waste.

We also research consumer attitudes through our annual **sustainability social survey**. It covers topics such as e-waste recycling, awareness of mobile operator recycling offers, understanding of ESG terms and other key sustainability topics. The results help us identify awareness gaps and shape future campaigns that are relevant to consumers. The need for our awareness activities was reinforced by insights from Yettel's research, presented during the **Re:Think Green Conference** this year. The research showed that many Bulgarian households keep unused mobile devices at home, even though these devices contain valuable materials such as gold, platinum, palladium, lithium and cobalt.

Recycling March



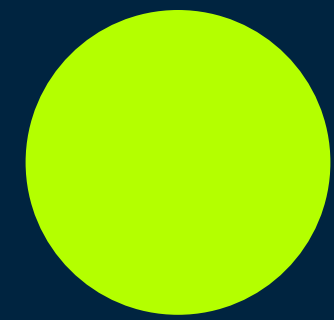
In March, Yettel's ESG Crew launched "Recycling March", a month-long educational campaign culminating around World Recycling Day. The initiative was kicked-off with an **online quiz**, covering the core principles of handling different types of waste, as well as an **educational material** on how to recycle different waste shared through our Intranet. The quiz was made available to employees via two in-person interactions at the Yettel headquarters and warehouse.



E-waste Collection Challenge

In May, we organized a company-wide "E-waste Collection Challenge" held over a period of four days at the Yettel headquarters and warehouse in Sofia. The efforts of Yettel employees led to collecting over 450 kg. of e-waste, demonstrating that our ESG strategy is not just a top-down mandate, but a shared value embraced by the entire Yettel team.

Internal employee initiatives collected **453 kg. of e-waste** and engaged **102 employees** in recycling education.



Putting People at the Center of Everything We Do

Own Workforce

Working Conditions

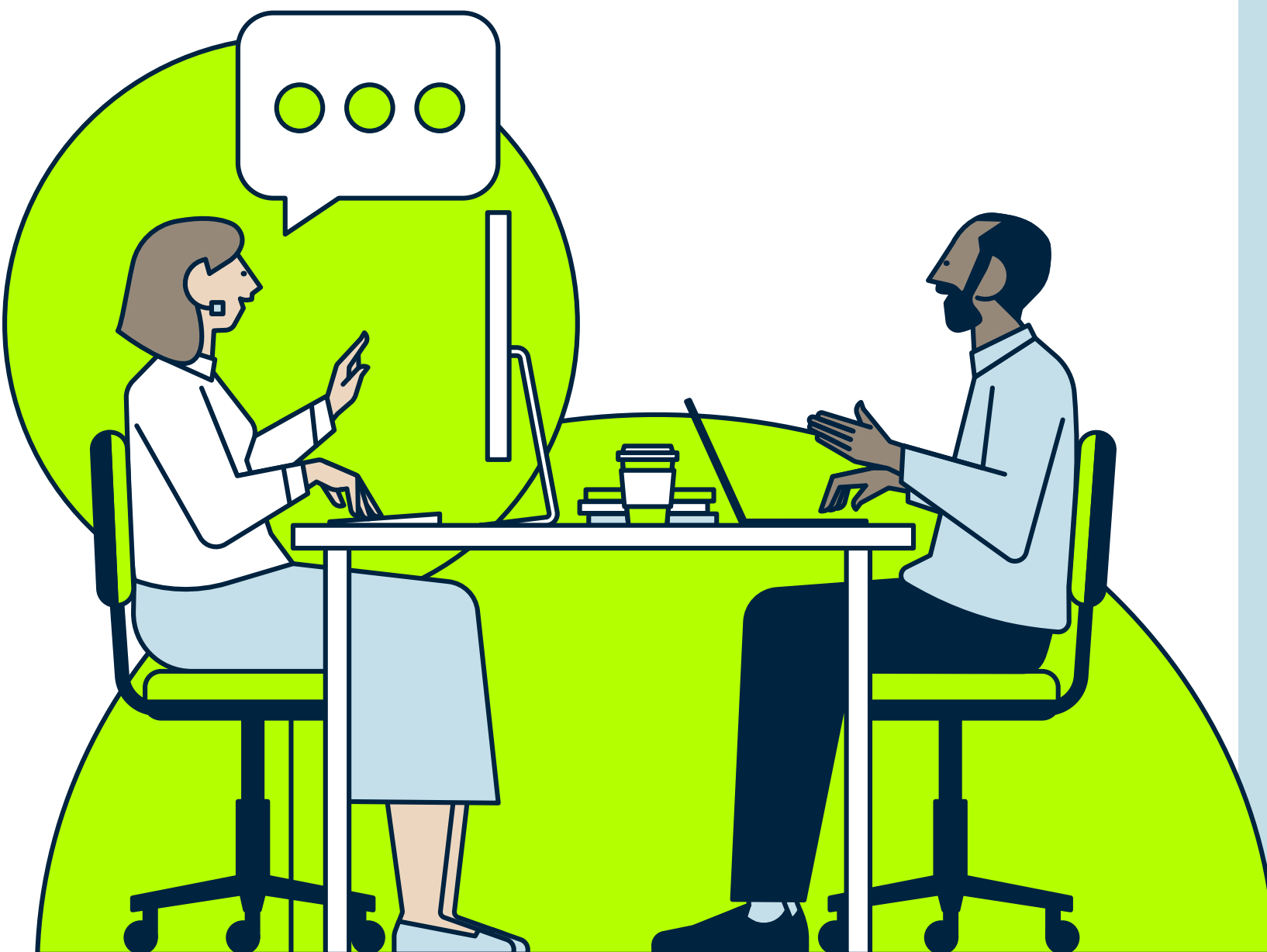
Governance and Strategy

At Yettel we lead our workforce through a clear structure of oversight, responsibility and continuous monitoring, ensuring that employee-related impacts, risks and opportunities are effectively identified, addressed and integrated into the company's broader sustainability and business agenda. Overall accountability rests with the Executive Leadership Team, including the CEO and C-suite executives, who are responsible for setting the direction for workforce-related priorities and ensuring alignment with Yettel's Sustainability Strategy, business model and long-term objectives.

Putting people at the center of everything we do is one of the four strategic priorities in our Sustainability Strategy 2028. We have set specific targets, each with a designated Target Owner responsible for actions, progress monitoring, policy implementation and follow-up on workforce-related plans.

The People and Culture function plays an important role in our day-to-day workforce management, bringing together teams that support different aspects of the employee lifecycle. They provide data, analysis, guidance and insights on key topics, including employee engagement, workforce planning, skills and capabilities, critical roles, people-related risks and opportunities and overall employee experience.

Significant workforce matters are regularly reviewed by the management team, including employee well-being, engagement, skills development, diversity and inclusion, organizational culture, leadership effectiveness and future workforce needs. The operational coordination of DEI topics is supported by the ESG Manager, who acts as a central point for ESG implementation within the company.



Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
Above market employee policies, including flexible working, mental health support and safety training, positively impact well-being by reducing stress and improving job satisfaction, supported by strong work-life balance measures like generous leave and parental flexibility for employees with young children	☑ Positive Impact	⚙️ Own operations	🕒 Short-term
Weaknesses in recruitment and employment practices create risks of child or forced labor leading to violations of human rights and negative impacts on children's development, education and well-being	⊗ Negative Impact	⚙️ Own operations	🕒 Short-term
Retaliation against whistleblowers who report concerns creates a culture of fear, discourages reporting of misconduct and undermines transparency, accountability and employee rights	⊗ Negative Impact	⚙️ Own operations	🕒 Short-term
Strong data protection policies and processes ensure secure handling of personal information and protect employee privacy	☑ Positive Impact	⚙️ Own operations	🕒 Short-term

Policies



During 2025, Yettel Bulgaria adopted a **People Policy**, which sets the framework for managing key workforce matters across the company, including employee planning, recruitment, onboarding, training and development, remuneration and benefits, work-life balance, employee engagement, performance management and offboarding. The policy applies to all employees, including full-time, part-time and temporary staff, and is aligned with international labor standards, national legislation and our Sustainability Strategy 2028. Its implementation is further supported by our **Internal Labor Regulations** which define the rules and processes for day-to-day workforce management.

Characteristics of Own Workforce



At the moment, female employees make up the majority of the workforce, accounting for 60% in 2025. Overall, the composition remains stable year over year, with only a slight increase in the share of male employees.

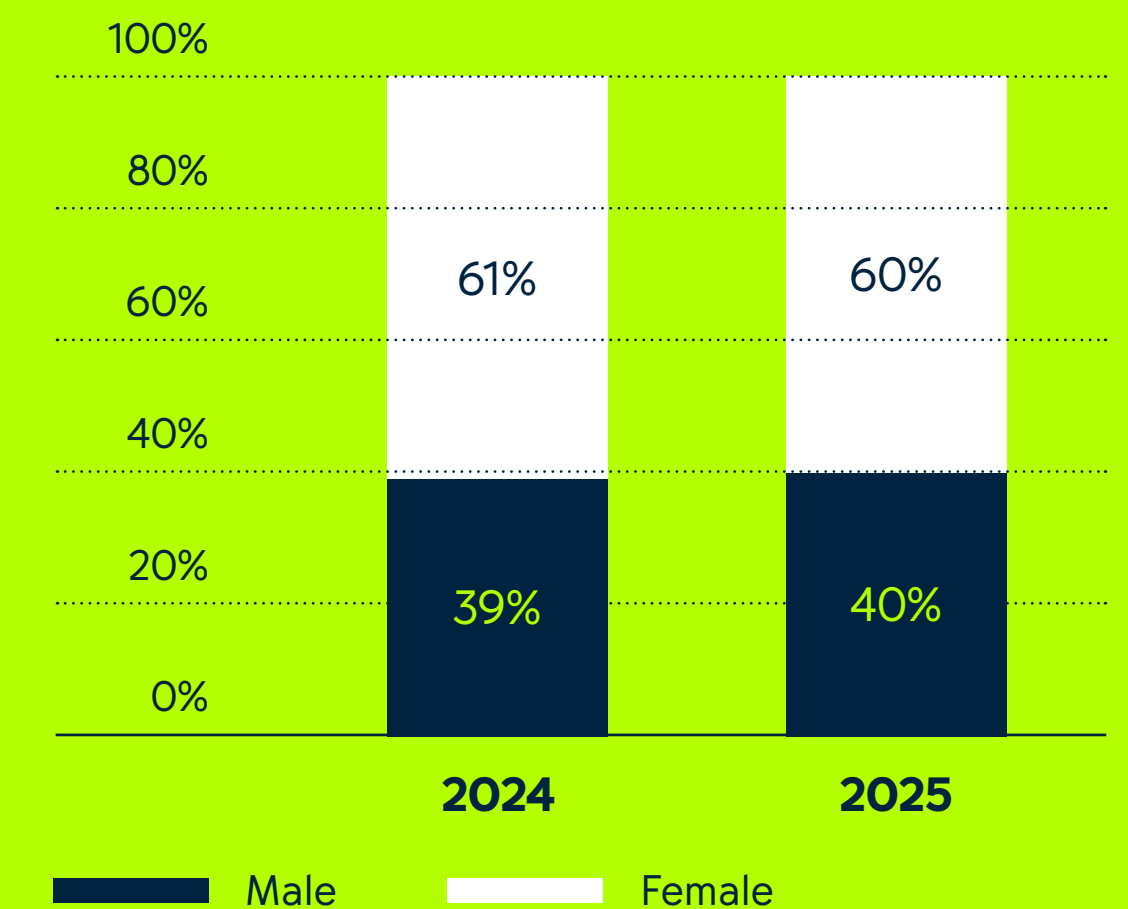


Figure 9

Proportion of all male and female employees (in active headcount) for 2024-2025

Actions

Strategic Workforce Planning

We apply a proactive Strategic Workforce Planning process, initiated during company strategy development or when planning strategic programs, with a 3-5 year horizon.

1

Our People and Culture Team Conducts:

- Baseline assessments
- Workforce supply and demand evaluations
- Gap analyses

2

Key Focus Areas Include:

- Resource adequacy for strategic ambitions
- Capability and skill gaps
- Cultural alignment
- Identification of critical roles
- People-related risks and opportunities



Based on these insights, we create clear action plans to fix gaps and use opportunities, making sure employee skills match changing business needs.

Adequate Wages

Our compensation policies strictly adhere to and exceed minimum wage requirements, guaranteeing no employee is paid below what is considered an adequate wage. Our remuneration system, which applies to everyone from new hires to senior management, has three main parts:

1

Basic Salary

Paid for fulfilling defined work tasks, obligations and responsibilities specific to each position. It is determined based on job evaluation and grading, along with other relevant factors, and is agreed upon in the personal labor contract.

2

Additional Remuneration

Includes mandatory payments as per the Labor Code, secondary legislation, statutory instruments, Internal Rules of Structure and Organization of Remuneration, and other normative deeds. It can be permanent or temporary and includes various types of remuneration such as compensation for work experience and professional length of service. All employees are also offered bonus schemes to motivate and retain employees who contribute to the company's performance - on a monthly or yearly basis, depending on the field of work and performance measures.

3

Other Remuneration

These are determined by normative deeds or individual labor contracts and are not included in the basic salary or additional remuneration categories. They include:

• Overtime work compensation:

50% increase for weekdays, 75% increase for weekends and 100% increase for official holidays, calculated based on the remuneration specified in the individual labor contract. Additionally, team members in the most senior positions, such as Senior Experts, Senior Advisors, Managers and Directors, are compensated with 5 more days of paid leave in lieu of their non-fixed working day assignment.

• Nightwork compensation:

Additional remuneration for every hour or part of an hour worked between 22:00 and 06:00.

• Stand-by duty compensation:

Additional remuneration paid per hour or proportionally for part of an hour when an employee is on stand-by duty outside the company premises at an agreed location.



Benefit package

Over the past year, we offered a total of 23 employee benefits. Of these, 11 were categorized as market average, the remaining 12 benefits were classified as above market.

Hybrid type of work



Mix of on-site attendance and home office

Food vouchers



Digital food vouchers to support daily living costs

Transport funds



Additional funds for gas/public transport license

Car parking



Parking spaces available for Expert position and above

Additional health insurance



Additional medical support for employees. Discount price for additional medical support for family members

Sport cards on discount prices



Sport cards for employees and family members at discount prices

Learning opportunities



Access to learning platforms and certification options

Refer a friend program



Program to receive a bonus when referring a friend to an open position

Discount program



Employee discounts for selected vendors incl. health & beauty services, vehicle maintenance, household goods, etc.

Drinks on the Town



Monthly social gatherings after work with refreshments provided

One-time payment when having a baby



One-off payment for having a baby

Additional day paid leave for employee's birthday



Additional day of paid leave during the month when an employee has their birthday

Additional day paid leave for volunteering work



Additional day of paid leave when joining a Yettel-organized volunteering initiative

Additional 4 days paid leave



Additional days of paid leave when all vested paid leave days over the year are used

20 days paid sabbatical



Recharge program - 20 days paid leave every five years of employment with the company to prevent burnout

Vouchers for mobile devices



Set amount provided by the company every two years. The amount of the vouchers is dependent on each employee's expertise

Mobile and data plans for employees



Unlimited mobile and data plans for employees

Additional funds for digital services



Additional funds for digital services linked to mobile and fixed services

Discount fees for mobile plans & fixed services for family members



Mobile plans and fixed services on discount prices

Car allowance



Additional funds for Managers/Sr. Experts and above

Sport activities in the office



Sport classes such as conditional training, yoga, Pilates & etc.

Corporate psychologist



On demand consultations with certified psychologist

Financial consultations



On demand financial consultations



Benefits which exceed the market standards for Bulgaria are marked in blue.

Work-Life Balance

At Yettel, we want people to feel they can do their job well without losing balance in their personal lives. We try to support that through flexible ways of working, different initiatives and a real focus on people's health and everyday well-being.

Flexible ways of working and well-being support

We help employees manage work and personal responsibilities through:

- Flexible working arrangements
- Well-being programs
- Work-life balance support

These are part of our broader effort to support employees' physical and mental health.

Leave support

We offer family-related leave to all our employees.



Creating conditions for different employee needs

We aim to create a work environment that benefits all employees and provides for people with different needs, including:

employees with family responsibilities

employees from minority groups

employees with disabilities

Listening to employees

We use several mechanisms to understand how employees feel and where support is needed. These include:

Monthly engagement surveys

Focus groups

Health and safety committee

Employee-led initiatives

Feedback implementation

Digital Office App

Intranet SharePoint

The feedback we gather helps us respond to workplace needs and improve employees' work environment. The surveys cover topics such as:

Organizational climate and trust

Work environment

Employee happiness

Engagement and motivation

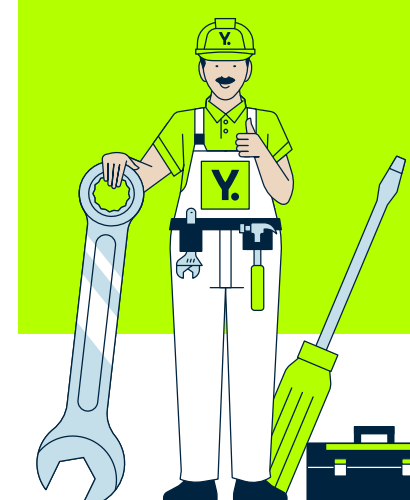
Well-being and psychological safety

Sustainability

Diversity, equity and inclusion

Addressing risks

We also recognize that employee burnout is a material risk. In addition, we track health and safety incidents and identify potential sanctions related to workplace accidents as part of our material risks.



Employee Engagement and Feedback Mechanisms

Employees are more likely to raise concerns and contribute ideas when they have clear channels for doing so and can see that feedback leads to action.

Monthly engagement surveys provide insights into organizational climate, leadership, well-being, motivation, sustainability and DEI. Over the course of the year, Yettel maintained high results across all indicators in the LutherOne platform used for employee engagement and satisfaction surveys, including topics related to well-being and psychological safety. Overall, **92% of employees were classified as “happy and engaged.”**

We engage employees through multiple structured channels to gather feedback, respond to workforce needs and continuously improve working conditions.



Engagement Method	Description	Key Actions
Monthly Engagement Surveys	Confidential assessments on engagement, satisfaction and employee net promoter score (eNPS)	Line managers and Executive Leadership Team (ELT) review and discuss results regularly
Focus Groups	In-depth discussions on DEI and other important topics	Direct interaction between employees, ELT and HR
Employee-led Initiatives	ESG Crew and Balance Crew - volunteer-based resource groups	Organizing employee activities to drive positive change and sustainable practices
	Project Management Community - an open community that brings together people involved in project management or those eager to learn more about it	Helps our employees find a common language, standardize project management practices and support colleagues at various stages of their project management journey
Feedback Implementation	Analysis of insights from surveys and focus groups	HR and ELT develop action plans and inform employees about outcomes
Grievance Mechanisms	Clear processes for reporting harassment or discrimination	Multiple reporting channels available; responsible personnel review feedback and implement improvement measures
Annual DEI Survey	Internal assessment to evaluate employee perceptions and experiences regarding diversity, equity and inclusion in the workplace	Gather feedback and actionable suggestions from employees to foster a more inclusive and supportive corporate environment
Performance Appraisals	Providing employees with regular reviews	Promoting employees' growth
Digital Office App	Company mobile application for internal communication, recognition, information on benefits, policies and short surveys	Employees get informed on news, access policies and participate in surveys
Internal Trainings	A structured learning system designed to build workforce capability, close skill gaps and future-proof employee competencies in line with evolving business needs	Providing employees with continuous access to curated knowledge resources and development pathways enabling their growth and sustained organizational performance
Intranet SharePoint	Channel for useful information and company policies	Providing employees with one-stop-shop for all company information, news and policies they might need
 The effectiveness of these actions is determined by indicators such as employee engagement scores, training hours per employee, gender diversity in leadership, health and safety incidents, and complaint resolution rates.		

Volunteering

Supporting local communities is part of Yettel's Sustainability Strategy under the People pillar. Through the employee volunteering program "Together for Good", the company supports causes in three main areas: environmental protection, vulnerable groups and stray animal care.

In 2025, Yettel supported **more than 20 socially significant causes**, with **over 600 employees** contributing **1 482 volunteering hours**. This exceeded the annual target of 1 000 hours for a second consecutive year and marked a **37% increase** compared to the previous year.

The program was delivered in partnership with nine organizations, including foundations, municipalities, social support groups and Vitosha Nature Park. Larger initiatives included the revitalization of emblematic locations in Kazanlak, clean-up and maintenance activities in Kleptuza Park in Velingrad and continued support for some of the most visited areas of Vitosha Nature Park.

Employees can suggest new causes and partner organizations, helping shape the program around topics that matter to them. Many activities also welcomed employees' relatives and families, turning volunteering into a shared experience and encouraging younger generations to participate.



Other Labor-Related Human Rights

We recognize the importance of **safeguarding employee rights** which includes maintaining clear recruitment and employment standards aligned with legal requirements and international labor principles, with a focus on preventing any risk related to **child or forced labor**. This approach applies not only to our direct employees but also extends to contractors and partners. We take care to ensure that work arrangements do not negatively affect access to education or fundamental rights, including **protection against forced labor**.

We continue to strengthen the **protection of employees who raise concerns** through established reporting channels, awareness activities and safeguards against retaliation. Employees are informed on how to report concerns safely and confidentially, helping support transparency and accountability while reducing the risk of retaliation or a culture of fear.

We also continue to improve our approach to **employee data protection**. Risks related to the leakage or misuse of private employee data are managed through internal policies, procedures, training and ongoing monitoring, so that employee data is handled securely and in line with regulatory requirements both in our operations and in relevant downstream activities.

Top Employer

In 2025, we retained our Top Employer certification for a second consecutive year. The independent audit recognized our strong performance across key HR areas, including DEI, employee engagement and well-being. Our results remain above the European telecom benchmark and we continue to work on further improvements in selected areas. We also implement a set of actions to support secure employment, workforce development, engagement and long-term retention.



We achieved the certification with a **score of 87.76%**, representing an **increase of over 2.88% over the previous year**.

We achieved a maximum score of **100% in four key areas**, including **"Purpose and Values"** and **"Ethics and Integrity"**, and improved our performance in several audited categories, including **Work environment (+8,59%)**, **Wellbeing (+7,09%)**, **Purpose and Values (9,89%)** and **DEI (+10,18%)**.



Health and Safety



Actions

Governance and Strategy

Our main framework for employee safety and well-being is our **Occupational Health and Safety Management System**, certified under **ISO 45001:2018**. Overall accountability sits with executive management, which integrates it into corporate decision-making and culture.

At governance level, the topic is owned by Chief HR Officer, while Health and Safety and People Relations Expert is responsible for coordinating the operational implementation of safety requirements, monitoring compliance and supporting risk prevention across the organization. Relevant HR roles, including the Manager People Relations, further support the alignment of health and safety practices with workforce policies and broader ESG commitments.

Health and Safety committee provide additional support by promoting awareness and strengthening employee participation in health and safety matters.

Policies

Our **Health and Safety Policy** is at the core of our Occupational Health and Safety Management System. It defines how we identify hazards, assess risks and prevent incidents, and applies to all employees. The policy is supported by a broader set of internal guidelines and procedures.

We regularly carry out risk assessments and implement measures to maintain high safety standards and comply with applicable legal requirements. Our occupational health services focus on prevention, health promotion and stress management. This approach is further supported by our **People Policy**, which aligns workforce management with international human rights and labor standards.

Preventive Safety Culture

Employees are encouraged to actively participate in maintaining a safe and supportive workplace by reporting risks and suggesting improvements, while ongoing training helps ensure that everyone stays informed about relevant safety practices. We also use surveys, focus groups and quarterly Health and Safety Committee meetings to better understand employee needs and concerns and to adapt our initiatives accordingly.



	IRO description	IRO category	Value chain	Time horizon
Material Impacts, Risks and Opportunities (IROs)	Insufficient health and safety awareness and coverage, combined with high workload pressures, can result in employee burnout, serious workplace incidents and lost working days due to health related issues	⊖ Negative Impact	⚙ Own operations	🕒 Short-term



100% of our employees are covered by our Occupational Health and Safety Management System

Well-Being Program

We continued the initiatives under our Well-Being Program which is built around four pillars: **physical, mental, social and financial well-being**. The program is supported by the **Balance Crew**, a group of employee volunteers who initiate, coordinate and facilitate activities focused on health, safety and sports, mental well-being and personal finance.

During the year, we worked under a strategic framework that brings together key well-being initiatives, including sports activities, psychological support and the Personal Finance Academy. We also introduced a **new Health Fund**, co-funded by employees and the company, and made the full range of programs available to all employees. We continued to provide preventive medical check-ups, while mental well-being was supported through access to a corporate psychologist.

Returning Employees Program



We maintained our long-standing **Re:Join program**, which helps employees returning from extended leave, such as parental leave or long-term illness.



Employees are also supported in cases of income loss linked to illness, work-related injury or disability, parental leave, retirement and other life circumstances.



In 2025, we exceeded our target of 40% participation in annual medical check-ups, with 43% of employees taking part. This represents a 7% increase compared to 2024.



In our 2025 Top Employer audit, our well-being program received a score of 84.66 – an increase of 2.17% over the previous year.



Balance Crew Calendar

This year we delivered a broad calendar of activities, including open sessions on personal finance, psychology and healthy habits, the Adventures League team competition, Health and Safety Month and sports initiatives such as marathons, tennis tournaments, step challenges and regular office workouts. Employees could also take part in yoga, pilates, Bulgarian folk dance, functional workouts and ski afternoons.

Our employee engagement in well-being activities increased over the year, with **1 597 enrolments recorded during the year** and a **5% rise in overall participation**. Although this reflects positive progress, it remained below our 10% growth target. The positive effect of our program is also reflected in our monthly engagement survey, where well-being received a high employee score of 89 out of 100.

Yettel. | Balance Crew. Calendar 2025

January Session for Reproductive Health Ski afternoon		February Personal Finance Month Bowling Tournament Ski afternoon		March Face Yoga Ski afternoon		April Health and Safety Month No Elevator Month	
May 10 000 Steps Football Tournament		June Adventures League Dragon Boats		July Water Sports at Pancharevo		August Water Sports at Pancharevo	
September Yettel Family Day Yettel Tennis Tournament		October 10 000 Steps Badminton Tournament		November Mental Health Month No Elevator Month		December Christmas and New Year	

Diversity, Equity and Inclusion

Governance and Strategy

Diversity and equal treatment at Yettel are governed through a defined structure set out in the **Diversity, Equity and Inclusion (DEI) Policy**. Overall ownership sits with the CEO as policy approver, while senior executives, including the Chief HR Officer and other C-level Officers, act as policy managers with accountability for implementation and oversight.

Our DEI principles are applied across the organization: leaders are expected to create an inclusive and non-discriminatory work environment, make decisions without bias and address inappropriate behavior. The People and Culture function supports policy application, reporting and guidance, while all employees are expected to follow equal treatment principles, avoid discrimination and harassment and report concerns through their manager, HR or compliance channels.



Progress is supported through defined DEI objectives and regular monitoring of results.

Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
Gender distribution is broadly balanced overall, however, structural imbalances in technical roles may contribute to unequal representation of women in specific areas and may drive gender pay gaps	⊖ Negative Impact	⚙️ Own operations	🕒 Short-term
Insufficient accessibility and a low representation of employees with disabilities restrict equal participation, despite efforts to build a more inclusive workplace beyond regulatory requirements	⊖ Negative Impact	⚙️ Own operations	🕒 Short-term
Enforcement of zero tolerance policies, reporting and training help prevent workplace violence and harassment and improve employee safety	✅ Positive Impact	⚙️ Own operations	🕒 Short-term
Weaknesses in recruitment may result in low diversity, although actions such as inclusive policies and targeted hiring help improve representation across groups	⊖ Negative Impact	⚙️ Own operations	🕒 Short-term
An inclusive work environment that actively values and supports individuals with disabilities strengthens equal participation, improves employee experience and goes beyond minimum legal requirements	✅ Positive Impact	⚙️ Own operations	🕒 Short-term

Policies

To guide our DEI efforts, we have developed a thorough policy framework, which includes our **Code of Conduct**, our **Ethics and Compliance Policy** and our **Group and Local DEI Policy**. The topic of DEI efforts and practices is also covered in our **People Policy**.

Our **Code of Conduct** firmly prohibits discrimination, while our **DEI Policy** outlines the principles and requirements we follow to ensure that everyone feels respected and welcomed in the community we create - this includes all our employees, but also goes beyond our own workforce, aiming to create positive impacts for all our vendors. To ensure accountability, we have established a grievance mechanism through our **Ethics and Compliance Policy** and **Local Whistleblowing Manual**, allowing any instances of discrimination to be reported and addressed.

We've designed our policies to cover all the actual and potential impacts on our workforce. They touch every part of our organization, from how we recruit and compensate our employees to how we approach professional development and engage with them. These policies apply to everyone in Yettel regardless of their position or type of contract.

Actions

Gender Equality

We continued our efforts to improve female representation, with a particular focus on technical roles where imbalances are more visible. These actions aim to support more balanced representation over time.

Currently **29% of our top management** (C-suite executives) **is comprised of women**.

The proportion of women in management roles (defined as everyone who leads a team or has at least one subordinate) **is 54%**.

In our technology workforce women represent 37% of all employees of the Technology division as of 2025, shortening the distance towards our 40% target by 2028. We will continue to increase female representation through development and retention initiatives focused on technology roles.

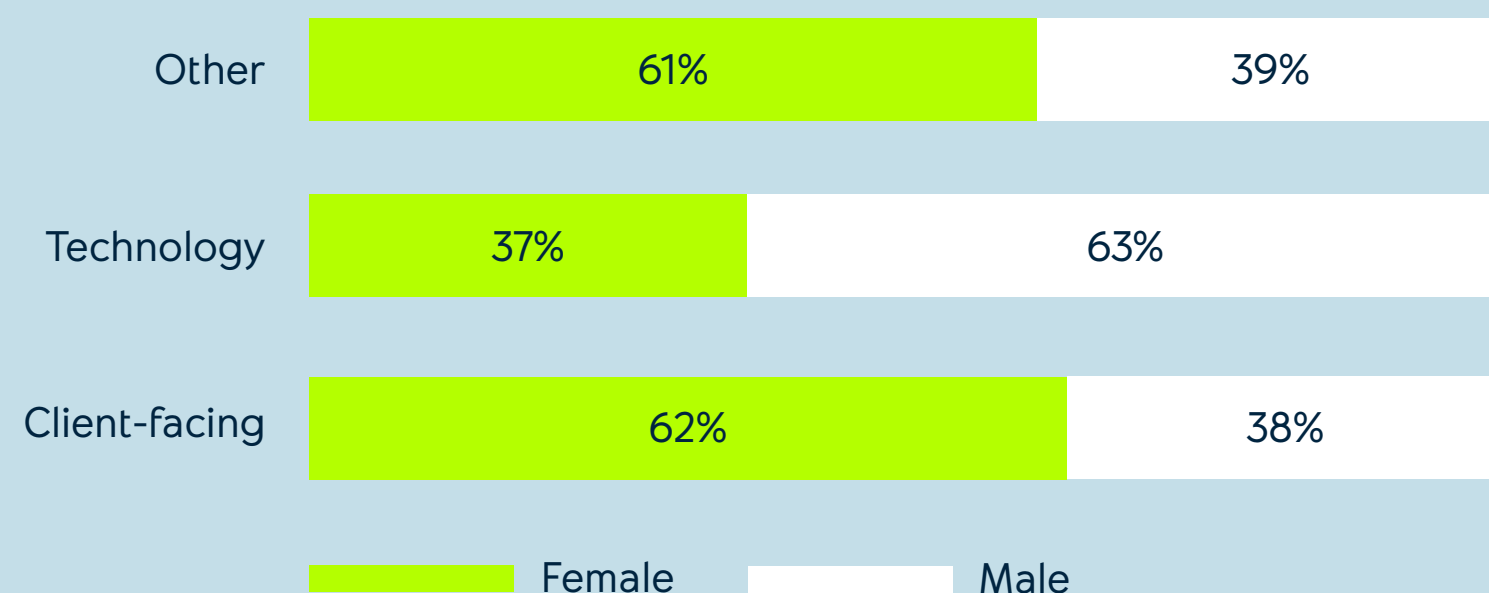


Figure 10
Proportion of male to female active headcount in different functions (2025)

We maintain gender-neutral compensation practices by using the same job descriptions and objective criteria for all employees, regardless of gender. Compensation decisions are based on the role, relevant responsibilities, experience, skills, performance and contribution, supporting our commitment to equal pay. Regular feedback channels help us monitor progress, understand employee expectations and identify areas where our DEI practices can be further improved.

We have a practice to assess employee confidence in our reporting systems through the **annual DEI survey**. This year 69% of participating employees fully agreed that Yettel has a procedure for submitting and reviewing reports related to Diversity, Equity and Inclusion in the workplace showing that employees are aware of the reporting procedures. Additionally, the survey revealed other significant highlights:



78% of employees believe that the culture of diversity equity and inclusion contributes to the company's success

82% confirm that equality is an important value within their team

Two cases related to discrimination and harassment were reviewed in line with the applicable internal procedures this year. Appropriate actions were taken in response regarding the concerned employees and relevant processes were reviewed and adapted to help minimize the risk of similar situations occurring in the future.

Disability Employment

We continued to implement established programs that promote inclusion, equal treatment and broader access to employment opportunities. Overall, employees with disabilities represented 4% of our workforce in 2025, reflecting our broader and long-term commitment to their sustainable inclusion and professional development.

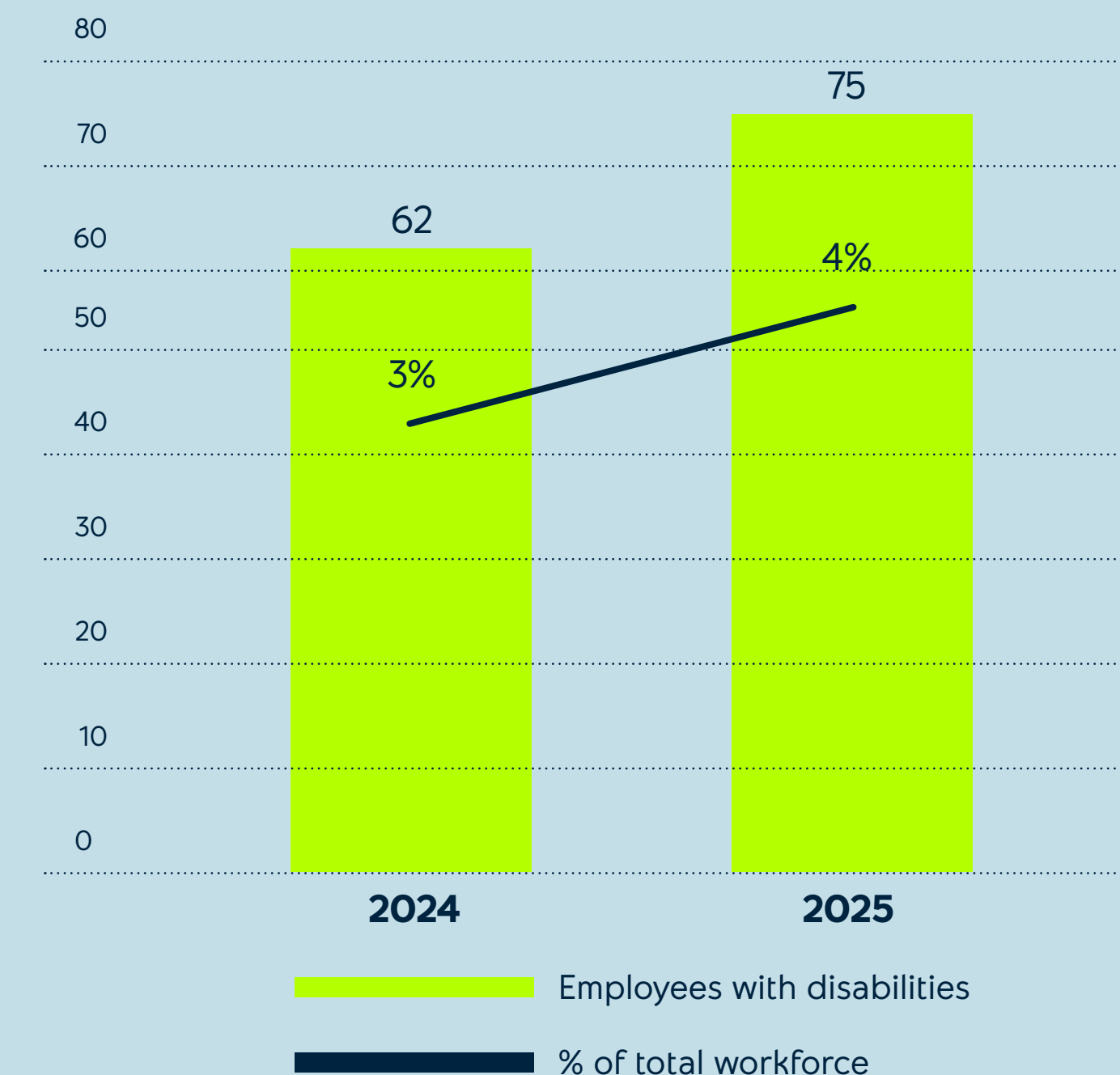


Figure 11
Total number of employees with disabilities and % of total workforce for 2024-2025



Side by Side Program

The Side by Side Program is just one part of our wider efforts to integrate employees with disabilities and create an accessible and supportive workplace. The program's eleventh edition was launched in December 2025 and during the year it **welcomed four new colleagues with disabilities**, offering them the opportunity to contribute to real projects, gain professional experience and become part of the company culture over a two-year period.

Beyond recruitment, the program also helped us strengthen the accessibility of our workplace for all participants. We reviewed the working environment and ensured that the necessary conditions were in place to support their full participation and inclusion from day one.

Family Support Initiatives

Throughout 2025, we continued to provide the children of our employees with the opportunity to go through a summer internship under the **Second Shift program**, giving teenagers the opportunity to gain valuable workplace experience across different teams. We also carried forward our **Yettel Teen Academy**, introducing adolescents to the workplace and relevant societal topics and the **Yettel Family Day**, engaging children through workplace visits focused on company culture and ESG. These programs are regularly reviewed to improve participation, relevance and overall impact.



Neurodiversity Audit

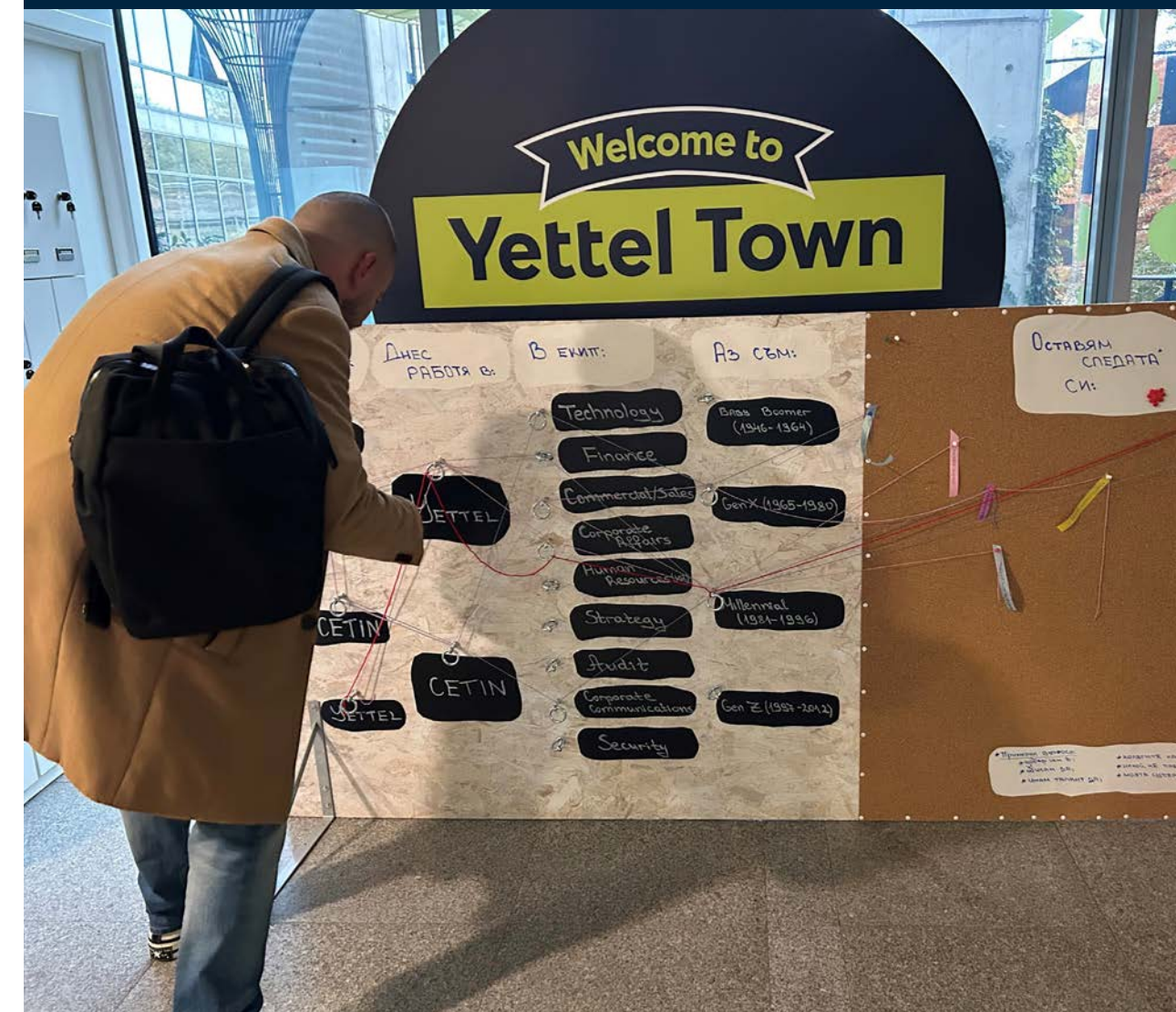
We conducted a comprehensive neurodiversity audit and became the first telecommunications company in Bulgaria to receive the Neuro Power Quality Seal for a neurodivergent-friendly workplace. The audit assessed the full employee experience - from recruitment, onboarding, learning and professional development to HR policies, organizational culture and the physical work environment - to determine how inclusive and responsive these areas are to neurodivergent employees. Recognized practices included our mentoring approach, individual consultations and open sessions with a corporate psychologist, dedicated focus rooms and adjustable lighting for employees with heightened sensory sensitivity. Building on Yettel's long-standing commitment to diversity, equity and inclusion, the certification broadens our focus to neurodivergent people, who represent an estimated 15-20% of the global population.



Awareness, Training and Partnerships

In November, Yettel marked the **International Day for Tolerance** by dedicating the month to initiatives promoting inclusion and understanding. Activities included a **Tolerance Wall**, where employees shared personal perspectives and experiences, an interactive **"How tolerant are we?" quiz** organized by the ESG Crew and an **open session on neurodiversity** delivered in partnership with **Catro**. Employee participation was strong, with over 250 employees taking part in the quiz and 30 employees attending the neurodiversity session.

We also continued expanding the unconscious bias training and related awareness activities, including discussions on women in the workplace and the technology sector. An **online training course on unconscious bias** was made available to employees, **with 70% of the workforce completing it**. These initiatives help employees recognize hidden biases and encourage more inclusive behavior in day-to-day work.



Our **collaboration with the Emprove Foundation** continued during 2025, supporting awareness and employee support related to domestic violence. We also started our engagement with the **LEAD Network**, a platform dedicated to advancing DEI in the retail and consumer goods sectors, focusing on knowledge exchange, collaboration and alignment with industry good practices in DEI.

Training and Skill Development

Governance and Strategy

Training and development are governed by the People and Culture Division, which oversees the function through its Talent Development team, HR Business Partners and close collaboration with managers and employees across the business. The Executive Leadership Team and CEO provide strategic oversight through regular reporting and alignment with organizational objectives.

Within the People and Culture Division, the Talent Development team owns the end-to-end training lifecycle for HQ employees: designing and maintaining the learning curriculum, coordinating rollout across departments, conducting Training Needs Analyses and tracking program effectiveness against defined KPIs. Training and development for retail employees is managed separately by the Frontline Development and Q&A, who develop program design and delivery to the specific needs of retail roles. The two functions align directly on AI upskilling and company-wide mandatory courses, ensuring consistency across HQ and retail on these priority areas, while each retains full ownership of its respective employee population's broader development needs. Both functions share a common objective: equipping employees with the skills required to execute the company's strategic priorities. HR Business Partners work directly with managers and directors across both HQ and retail to identify skill gaps at the team level, translate them into individual development plans and follow up on completion of required training.

Line managers are responsible for applying these practices day to day – ensuring training assignments stay relevant to each employee's role, performance objectives and development needs. Employees, in turn, are expected to complete mandatory, onboarding and role-specific training, and to actively pursue continuous learning aligned with evolving business requirements.

Delivery is structured across five channels: onboarding programs for new hires, mandatory e-learning modules, role-specific technical/functional training, continuous learning opportunities (webinars, internal sessions, knowledge platforms) and educational grants for external qualifications. Progress and impact are tracked through KPIs reported to leadership on a regular basis.

Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
The implementation of structured development programs positively impacts employee capabilities by strengthening skills, competencies and overall workforce performance	✓ Positive Impact	⚙️ Own operations	🕒 Short-term

Policies

Training and skill development at Yettel are governed through the **People Policy**, with overall accountability held by the CEO as policy approver and the Chief HR Officer as policy owner, supported by designated policy managers.

Training and employee development activities are further guided by Yettel's internal **"Training of Employees" framework**, which covers applicable legal, regulatory and internal requirements related to employee training. The framework helps ensure that employees receive relevant and

role-specific training, including also topics, such as ESG, data privacy, information security, health and safety and ethics and compliance.



Actions

Training and Employee Development

We support employee development through continuous learning and structured career management, including:

- Continuous learning opportunities
- Regular **performance appraisals** that promote employee growth
- **Internal training programs**, including webinars, learning sessions and knowledge platforms

100%

of our employees underwent performance and career development reviews

New employees are introduced to Yettel's values, operations, products and services through structured **onboarding**. ESG training is provided to all roles across the company. Managers and employees in different business areas also receive training tailored to their responsibilities and the specific requirements of their roles.



Training Category Trainings Conducted in 2025

ESG Trainings	• Our ESG Trainings Program successfully introduced comprehensive e-learning modules, achieving high participation rates across the organization
Onboarding	• "Hop On Yettel" Days provides new employees with a structured introduction to the company. The program covers Yettel's organizational structure, business divisions, key internal programs and initiatives, and includes a group-based business simulation built around a practical case. It also gives participants first-hand insight into frontline operations through a half-day store visit • The company offers specialized onboarding program for store employees, including a Sustainability module
Upskilling	• A company-wide mentoring program fosters knowledge sharing and professional growth • Edu Grants Program (2025 Transition): under the slogan "Specialize This", the Educational Grants program underwent a major strategic transition. Applications for the program officially open in January, transitioning to a year-round application process instead of a single, fixed annual window
Leadership Skills	• Training programs focus on digital upskilling and leadership development for all levels • New Managers Program – supports a smooth and more professional transition into management roles • The Project Management Academy – fully insourced, transitioning from external vendors to being facilitated entirely by internal experts from key business divisions (Strategy & Transformation, Commercial, Strategic Finance, Information Security, and Business Controlling)
AI Training Program	• The AI Training Program develops awareness, basic prompt techniques and the importance of human oversight when reviewing AI outputs

Key Training Programs in 2025



We provided our employees with over 70 000 hours of training this year

Yettel Superhero Journey

The Yettel Superhero Journey is an integrated training ecosystem for the retail network, combining digital learning, face-to-face training, coaching and mentoring. It supports onboarding for new hires, skill development for existing employees and advanced leadership development. Within six months of launch, the program created a digital library of more than 50 trainings for the retail network.

Key Results:

- **179** new employees completed in-person onboarding (average 29 hours/employee)
- **255** participants engaged with 58 digital courses (average 12 hours/employee)
- **157** participated in online sessions (average 4 hours/employee)
- **185** employees received on-the-job coaching in stores (average 32 hours/employee)

Super Leader

The Super Leader program continued to strengthen leadership capabilities in Yettel's retail network through a practical, coaching-based approach. Participants apply the learning directly in their daily work by managing real cases and tracking results within their teams, with a focus on engagement, efficiency and change management.



Growth Mindset

The Growth Mindset program continued this year with additional awareness sessions and practical tools to support cultural transformation, innovation and continuous improvement. During the year, we delivered interactive workshops and introduced two practical methodologies:

Pre-Mortem, used to identify risks early and define mitigation actions

Marginal Gains, which supports improvement through small, incremental changes

Six sessions were delivered for each methodology.

Key Results:

- People leaders trained in practical tools: **150**
- Employees participating in Growth Mindset awareness sessions: **300**
- Workshops delivered: **12**



We achieved our objective to upskill over 80% of our people leaders under the program.

AI Training Program

The AI Training Program was designed to build basic AI awareness across the workforce and provide a common understanding of responsible AI use. It introduced key AI and machine learning concepts, company rules on data protection and compliance, basic prompt techniques and the importance of human oversight when reviewing AI-generated outputs. Privacy considerations were also integrated into our training curriculum, to show our interdependence between privacy, data governance, and responsible AI. Additional new modules and refreshers are planned for 2026.

Key Results:

- Learning modules delivered: **5**
- Employees invited: **1 800**
- Employees completing the program: **1 620**
- Average completion rate: **90%**, surpassing our 85% target



Our Awards

We received several awards in 2025:

The National DEI Awards by Council of Women in Business in Bulgaria:

1st place: Inspiring communications campaign for raising awareness on DEI - awarded for the **“Look Around” interactive installation**. The unique mirror installation was placed in the center of Sofia to mark the 10th anniversary of our “Side by Side” program. Through its reflective surfaces, the project encouraged citizens to look past differences and foster deeper empathy and acceptance.



The Employer Branding Awards by b2b Media:

1st place: Employer Branding Project of the Year
2nd place: DEI Strategy

Career Show Awards - one of Bulgaria's largest career and employer branding events, attracting over 200 companies and more than 4 000 attendees annually. Yettel received the following recognition:

1st place: Best Employer (Telecommunications)
1st place: Strategy for Learning and Development
2nd place: Talent Acquisition Strategy
3rd place: Strategy for Engagement of Employees

The **BAPRA Bright Awards** for the **“Super People. Super Technologies”** employer branding campaign:

Gold: Internal Communications
Gold: PR Campaign Incorporating AI
Bronze: Employer Brand Campaign

Forbes HR & Employer Branding Awards 2025:
3rd place: Engagement of Employees



Workers in the Value Chain

Governance and Strategy

As a telecommunications provider, we recognize that our activities, products and business relationships can have impacts across the value chain. Our dependence on electronic equipment and infrastructure connects us to complex global supply chains, including upstream activities such as raw material extraction and manufacturing, which are associated with impacts on the working conditions, rights and well-being of workers involved in different stages of production and distribution.

At Yettel, topics related to workers in the value chain are governed through the cooperation of the Sourcing and ESG functions, with oversight from the ESG Manager and the Sourcing and Logistics Director. The Sourcing division is responsible for identifying vendors, initiating supplier engagement and collecting the information needed for ESG assessments. The ESG Manager and wider ESG team review supplier submissions, assess ESG-related risks and provide input on appropriate follow-ups where relevant.

Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
Deficiencies in supplier management may result in human rights breaches not being identified, prevented or addressed	⊖ Negative impact	⚙️ Upstream	🕒 Short-term 🕒 Medium-term 🕒 Long-term
Workers in electronics manufacturing may be exposed to child labour, forced labour or other human rights violations	⊖ Negative impact	⚙️ Upstream	🕒 Short-term 🕒 Medium-term 🕒 Long-term
Workers in mineral extraction for electronic equipment may be exposed to child labour, forced labour or other human rights violations	⊖ Negative impact	⚙️ Upstream	🕒 Short-term 🕒 Medium-term 🕒 Long-term

The ESG Manager and Sourcing and Logistics Director are responsible for overseeing the implementation and regular review of the sustainable sourcing process.



Policies

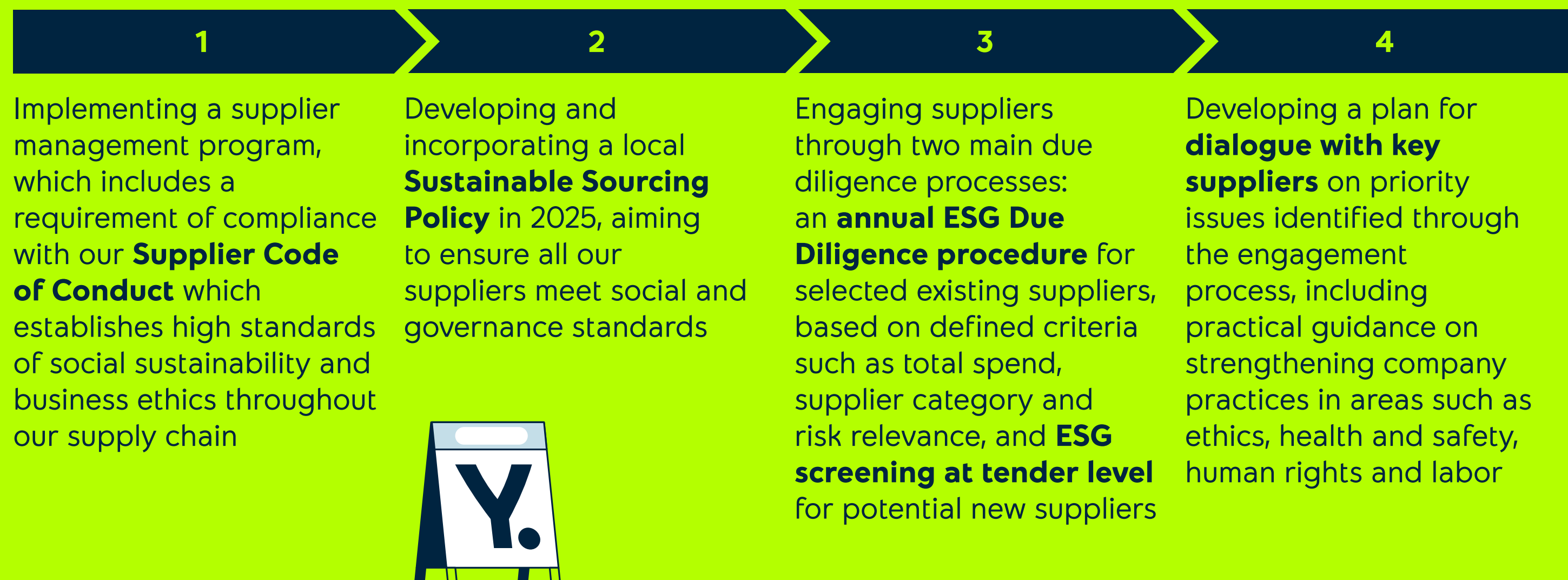
The e& PPF Telecom Group Supplier Code of Conduct is the main policy document guiding our approach to respecting human rights across the value chain. It is aligned with internationally recognized instruments, including the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The Code requires suppliers to comply with applicable labor and human rights laws and prohibits human trafficking, forced labor, child labor, bonded labor, indentured labor and prison labor

throughout our supply chain. It also sets expectations for fair, respectful and inclusive treatment of workers, including equal opportunities, non-discrimination, protection from abuse, harassment or intimidation, and wages and benefits that meet applicable legal requirements and relevant collective agreements.

In 2025, Yettel Bulgaria adopted a **Sustainable Sourcing Policy**, which sets a structured process for assessing, engaging and monitoring upstream suppliers, vendors and service providers on ESG topics, including human rights and labor practices.

Actions

We manage issues related to workers in the value chain by:



Our Supplier Due Diligence

During the reporting year we launched our second supplier engagement campaign to assess ESG risks in our value chain. Existing suppliers were selected based on pre-defined criteria (e.g. total spend, supplier category, assumed inherent risk) and invited to complete a **structured self-assessment covering six key sustainability topics**:

Human rights and labor	Health and safety
Anti-corruption and anti-bribery	Supply chain responsibility
Environmental protection	Carbon footprint

Suppliers are assigned a risk rating based on their industry, country of operations and responses. Those identified as medium or high risk are subject to additional checks. Progress is monitored by responsible teams and, in higher-risk cases, this may include participation in targeted engagement initiatives.

The results of the campaign show stronger supplier engagement and improved ESG performance. In the reporting period, 73% of invited suppliers registered on our platform, compared to 63% in 2024, and the completion rate also increased. The number of suppliers flagged as high risk also decreased from 7 in 2024 to 4 in 2025, indicating progress in the overall ESG maturity of our supply chain.

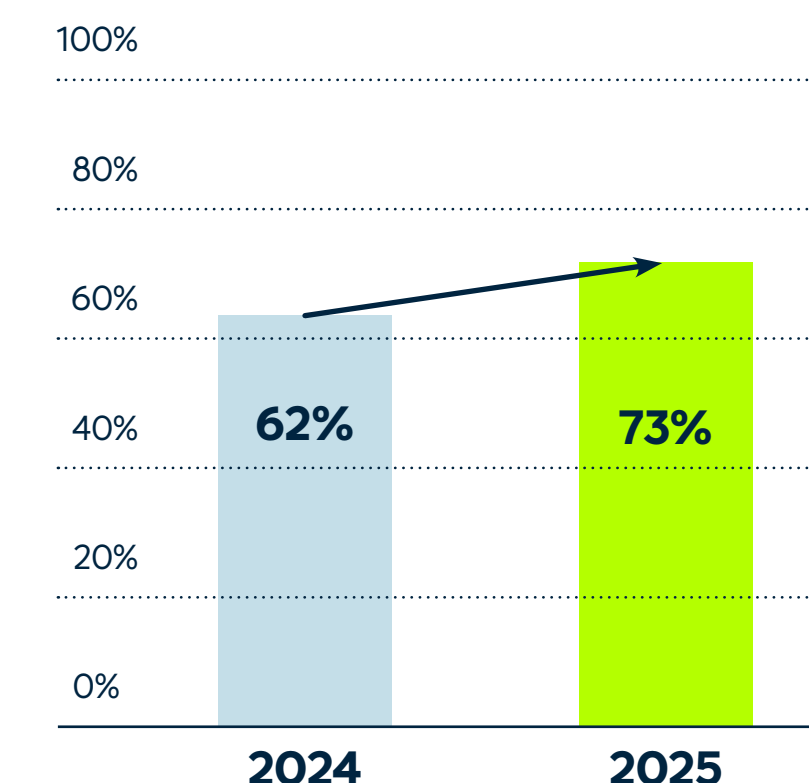


Figure 12
Percentage of registered suppliers from all suppliers invited to participate in our engagement campaigns in 2024-2025

ESG Screening at Tender-Level

In August 2025, we also introduced ESG screening at the start of the procurement process. All new suppliers participating in tenders are required to complete questionnaires, including ESG, compliance and data privacy topics. This process is supported by ESG, Sourcing, Compliance, Legal and Data Privacy teams.

The screening is performed before any business relationship is established and is used to identify risks early in the selection process. By the end of 2025, 230 ESG assessments were sent to potential suppliers, with 86 fully completed.

The combination of supplier screening at tender-level and our annual supplier engagement campaign allows us to manage risks across the full supplier lifecycle, from initial selection to ongoing monitoring.



Remediation and Reporting of Concerns

We have established secure and reliable channels through which individuals can voice their concerns, report needs or highlight any observed or suspected breaches of compliance to ensure that every stakeholder has a direct communication channel with us. Stakeholders can easily report issues via email at compliance@yettel.bg or by using the [online reporting form](#) available on Yettel Bulgaria's official website.

Supplier Initiatives

Supplier engagement is supported through initiatives such as **ESG Connect**, a series of in-person events focused on sustainability topics, exchange of good practices and practical recommendations. The initiative is primarily aimed at B2B customers and partners. So far, three editions have been held, covering topics such as the first steps in developing a sustainability strategy, integrating ESG solutions into business operations and creating an inclusive environment that supports diversity, equity and inclusion.



In 2025, Yettel expanded its ESG Connect initiative by hosting a regional discussion in Plovdiv focused on sustainable development and the integration of ESG principles into business operations. The event enabled local companies to exchange practical insights on aligning their daily operations with sustainable standards and navigating new regulatory requirements.



▶ Accelerating Technology for a Sustainable Future

Consumers and End-users

Reliable Connectivity and Digital Skills Improvement

Governance and Strategy

Yettel aims to be a trusted digital partner for our clients. Working with CETIN's network infrastructure, we enable communication, digital services and innovation across Bulgaria. For businesses, our solutions support continuity, productivity and growth by helping them manage teams, run operations, serve customers and adopt new technologies.

As part of our efforts related to our Sustainability Strategy 2028, under the pillar Tech for Sustainable Future, we focus on expanding 5G coverage, introducing digital solutions that support businesses and society, improving online safety and digital skills and maintaining resilient cybersecurity and personal data protection.

Customer-facing activities are coordinated under the Chief Commercial Officer, who oversees consumer sales, business sales and support, digital sales, and the implementation and regular review of our **Responsible Marketing Policy**.

Marketing and Corporate Communication teams ensure that Yettel's marketing, PR and public communication are clear, accurate, ethical and transparent. The Legal team supports this by monitoring compliance with legal and ethical standards.

Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
We use technologies and expertise to improve consumers' lives through raising awareness and strengthening their digital literacy	☑ Positive impact	▼ Downstream	⌚ Short-term Medium-term Long-term
We provide customers with accurate and high-quality information about offered product and services	☑ Positive impact	▼ Downstream	⌚ Short-term Medium-term Long-term
Customers may be negatively affected if their legitimate opinions, complaints or feedback are restricted, ignored or treated unfairly	⊖ Negative impact	▼ Downstream	⌚ Short-term Medium-term Long-term
Improved digital skills and internet safety awareness can help consumers use digital services safely and responsibly	☑ Positive impact	▼ Downstream	⌚ Short-term Medium-term Long-term
Children may face increased risks to their safety and well-being due to excessive time online and higher vulnerability to online harms	⊖ Negative impact	▼ Downstream	⌚ Short-term Medium-term Long-term

Policies

Yettel's work is supported by the **Local Stakeholder Engagement Policy** and its annex, developed in 2025. These documents describe how the company engages with all its stakeholders, including customers and end-users.

The **Responsible Marketing Policy**, also implemented during the reporting period, supports clear and transparent communication with customers. It requires Yettel to provide accurate information, avoid misleading claims and explain terms, conditions and prices in a way that customers can understand. The policy also promotes responsible and ethical marketing, public relations and corporate communications by ensuring that all customer-facing materials, media engagements and events are reviewed for compliance with legal and ethical standards. It encourages responsible media storytelling, diversity and inclusion in communications and the promotion of sustainable products, services and lifestyles.

We also apply internal rules for supporting specific customer groups, including customers with hearing and visual impairments and customers aged 65 and above.

Actions

Network Coverage

Our technological leadership over the past two decades includes the launch of Bulgaria's first commercial 4G network in 2015 and the introduction of our 5G network in 2021. Yettel and CETIN continued to expand the 5G network in Bulgaria as part of a large-scale network development program. The work included both the installation of new 5G sites and upgrades to existing infrastructure carried out in close cooperation between the two companies. In total, the program covered the planning and implementation of near 2200 geographic sites equipped with 5G technology across the country.



The wider 5G coverage gives more customers access to faster speeds, lower latency and a more reliable mobile experience. It also supports everyday digital needs such as remote work, learning, streaming, gaming and business connectivity.

In 2025, our 5G population coverage reached 86.59%, exceeding our target to provide 5G access to at least 85% of the Bulgarian population one year ahead of the original 2026 deadline.

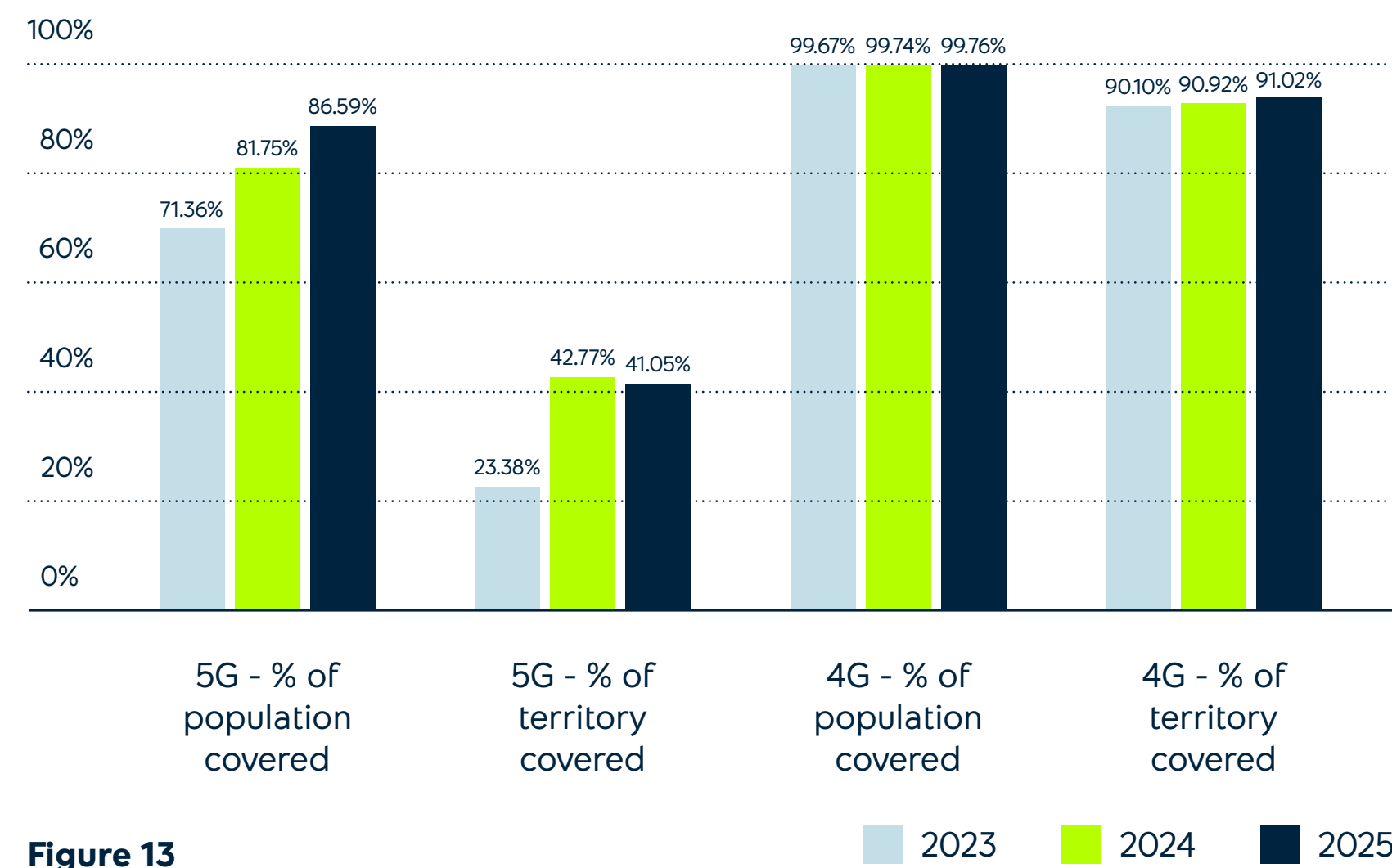


Figure 13

Yettel network coverage¹ in Bulgaria

¹ Due to a change in the methodology used to calculate territory coverage, the 2025 data is not directly comparable with data reported for previous years.

This year, Yettel's network received the **Best in Test** certificate for the **9th consecutive time**, scoring **922 out of 1 000 points** and achieving the highest result among the three telecom operators in Bulgaria. The recognition is based on **umlaut's independent mobile network benchmark**, which analyzed 119.3 million network samples collected from 12.1 thousand users over a 23 week period (July through December 2025), covering 95.8% of Bulgaria's built-up areas and 97.7% of its population areas. The assessment uses a crowdsourced methodology that measures real customer experience across key indicators such as coverage, data performance, latency, voice quality, reliability and network stability, based on anonymized data collected through a wide range of mobile applications.



Digital Education and Online Safety

Access to digital services is most useful when people also have the skills to use them safely and critically. Yettel continued its long-standing **Online Safety and Digital Skills Development Program** in 2025 which helps children, young people, parents and teachers use technology safely and responsibly. It focuses on improving digital literacy, raising awareness of online risks and providing practical tools for safer digital behavior. It is implemented in partnership with the **National Center for Safer Internet, Prepodavame.bg by Teach for Bulgaria, Klett Bulgaria Publishing House and the Center for Creative Training.**

Over the course of the year, we continued to support **digital safety education in schools** through our existing portfolio of educational materials and resources. During the year, we expanded this content with new classroom materials covering:

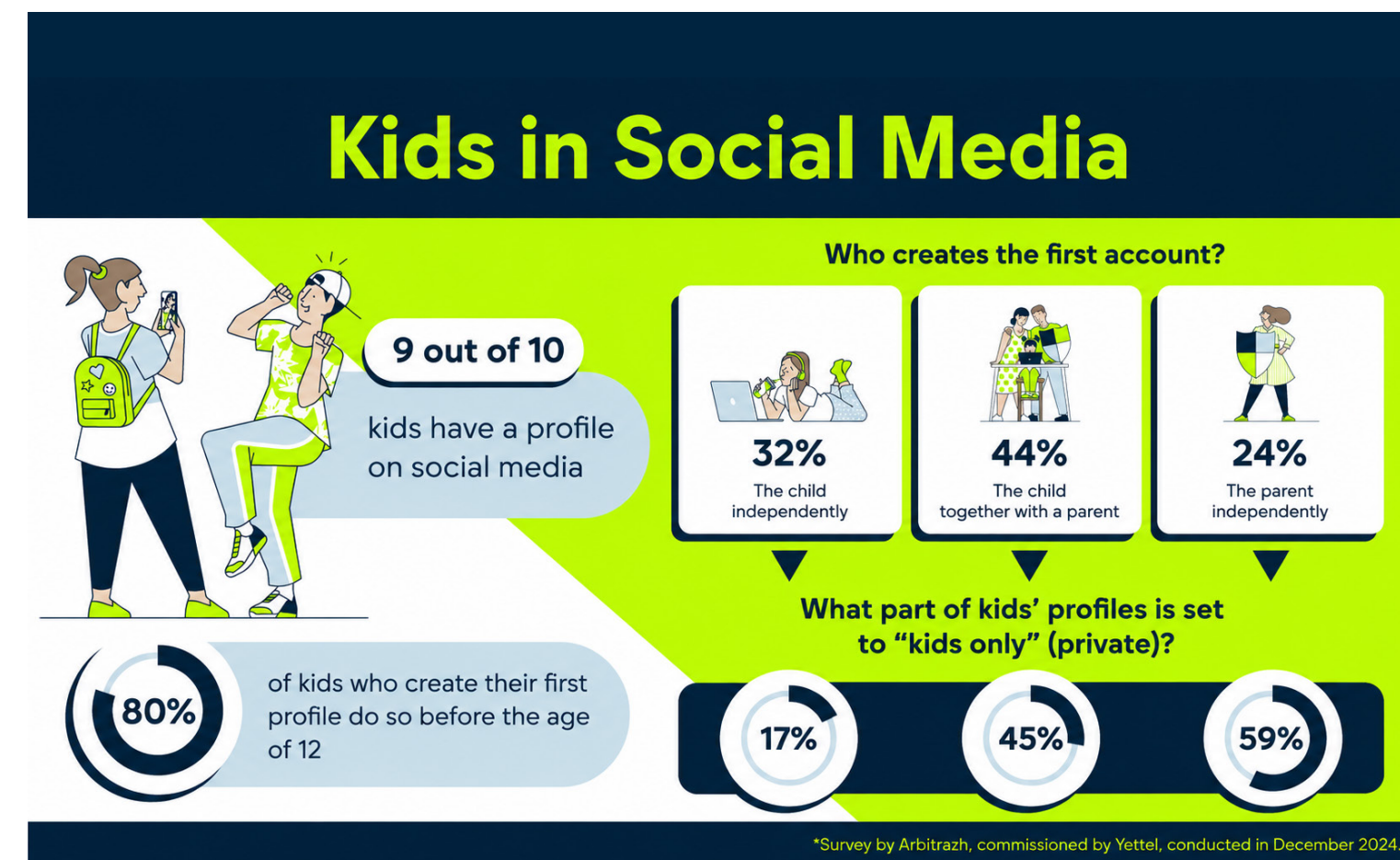
				
personal data protection	social media behavior	cyberbullying	fake news	online disinformation

The company also continued **practical online training for teachers** on digital and AI-based tools for education.

We also developed the **first Bulgarian digital skills self-assessment tool for students and teachers**, aligned with the EU DigComp framework. The tool helps users understand their digital competences and helps us identify key digital safety challenges and emerging risks. **Over 3 000 students and 3 000 teachers** completed the digital skills self-assessment tool.

To better reflect evolving societal needs and the broader reach of our programmes, we revised our target during 2025. We replaced the separate targets to engage 40 000 children on online safety and equip 10 000 adults with digital skills with a single annual target to reach 50 000 people. This combined target recognizes the increasingly interconnected needs of children, parents, teachers and other digital users.

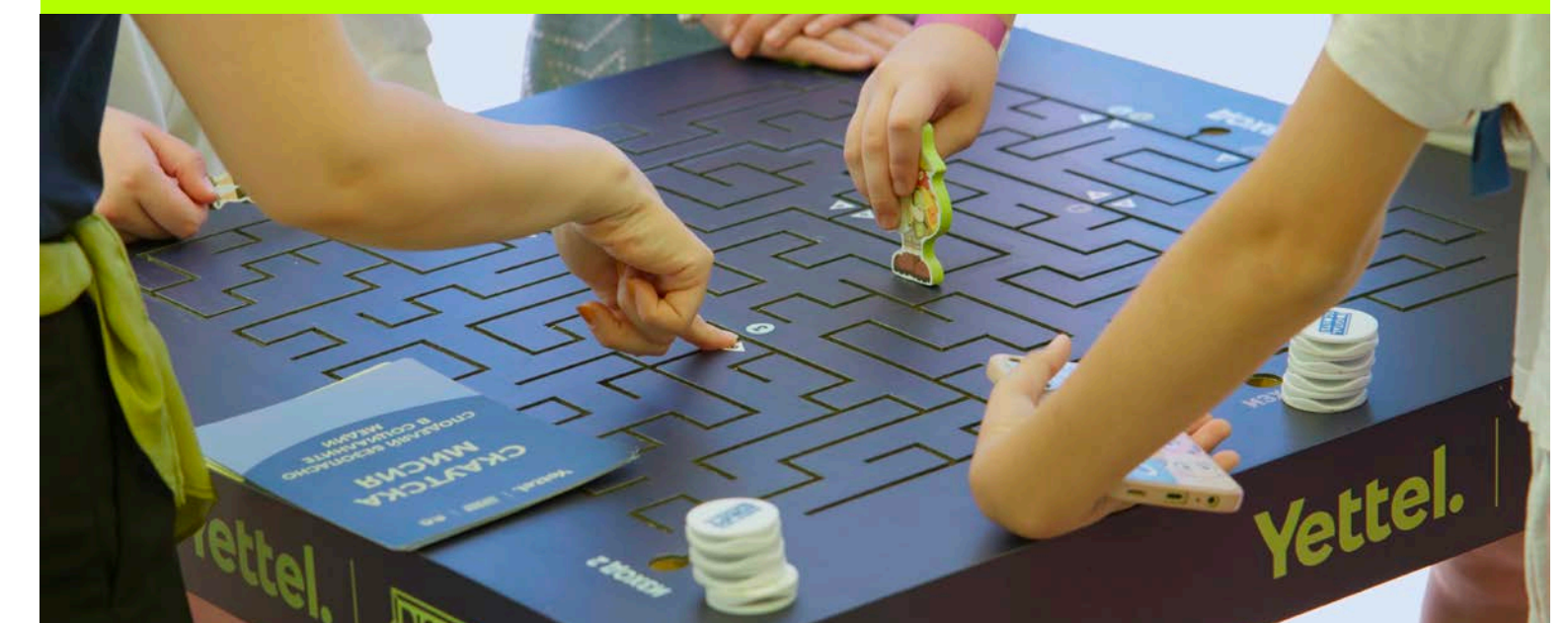
We engaged over 60 000 children and young people on online safety and responsible digital behavior during 2025, exceeding our annual target of 40 000.



Digital Scouts

This year we refreshed the Digital Scouts campaign with **new educational online games** for children and teenagers aged 7-13 and 14-18. The campaign uses interactive formats to make online safety easier to understand and more engaging for young people.

The Digital Scouts activities were also brought directly to children **offline** through **events** at five schools in Sofia, Pleven and Sliven, as well as four youth festivals. Through quizzes and interactive activities on digital safety, the traveling **Digital Scouts installations** engaged over 2 000 children.

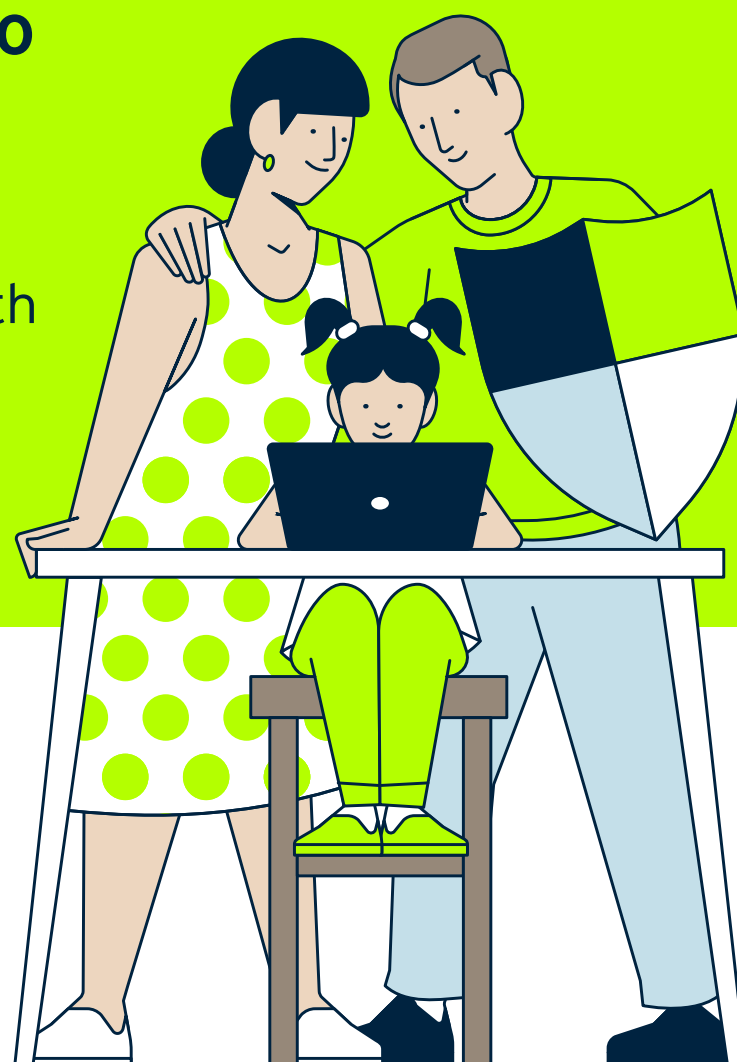


Digital Parenting

Yettel's annual survey among children and their parents highlights the important role that parents play in helping children navigate the digital world safely. Based on these insights, parents and teachers remain key target groups in our digital safety initiatives.

Through the Online Safety and Digital Skills Development Program, we actively engage and educate teachers and parents to better understand online risks and support children in developing safe and responsible digital habits. The annual survey also helps us identify emerging challenges and adapt our initiatives accordingly.

During 2025, over **12 000 people** improved their digital skills, exceeding our annual target to equip 10 000 people with digital skills.



Network Safety and Public Health

Governance and Strategy

We recognize that mobile networks and devices can raise questions about public health, especially in relation to electromagnetic fields.

Our approach is to comply with applicable safety standards, follow recognized international guidelines and ensure that our infrastructure and devices meet regulatory requirements before they are used by customers.

Responsibilities for this topic are shared across different functions within the company. The Device Value Chain team oversees compliance related to mobile devices offered to customers, while network-related topics are managed jointly by the technical teams of Yettel and CETIN, which are responsible for network planning, expansion and infrastructure deployment.

We also apply preventive controls before building new base stations and perform technical checks before putting them into operation.

Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
Consumers may experience harm to health or well-being due to the use of our products or services (e.g. addiction to technology, emissions of electromagnetic radiation)	⚠ Risk	⚙ Own operations ✓ Downstream	⌚ Short-term ⌚ Medium-term ⌚ Long-term

Policies

Yettel follows international and national safety requirements related to electromagnetic fields.

We apply the guidelines of the **International Commission on Non-Ionizing Radiation Protection**. These guidelines include safety margins and are used to assess exposure from mobile networks and devices. We also comply with applicable Bulgarian and EU requirements for base stations and mobile devices.

Actions

Customers should be able to use telecommunications services and devices with confidence that applicable health and safety requirements have been met.



Mobile Infrastructure Safety

The company applies a two-level control process for mobile infrastructure.

1

Control Before Construction

Before building a new transceiver station, we go through a preventive control process, which includes:

- approval from local authorities
- preliminary sanitary assessment by the Ministry of Health
- confirmation that the planned parameters meet regulatory requirements

These steps must be completed before construction can start.

2

Control Before Commissioning

After construction is completed, we conduct on-site electromagnetic field (EMF) measurements and document the results in an EMF protocol. A base station can be put into operation only if the measurements confirm compliance with safety limits. These limits are based on safe levels defined by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), an independent advisory body that collaborates with the World Health Organization (WHO).



Product Safety

We offer customers mobile devices that comply with applicable local and EU health and safety requirements. Before being placed on the market, devices must be tested by manufacturers and importers to confirm compliance with relevant EU directives and limits.

During the reporting year, we **maintained full compliance with health and safety requirements for our products, services and infrastructure, with 0 incidents of non-compliance reported.**

Customer Engagement

Yettel offers several customer contact channels:

- Physical stores across Bulgaria
- 24/7 call center
- Yettel mobile app
- Company website
- Social media
- Business customer portal

We collect customer satisfaction feedback on network performance, roaming, digital channels, stores and customer support. We also use monthly online panel surveys to compare performance with competitors and identify where services and customer experience can improve.

Yettel provides tailored tariffs and discounts for customers with any type of disability. We also regularly review our approach to customers aged 65 and above through our Privacy Forum. There is a Customer Experience Squad, dedicated to fast resolution of complex customer issues.

Smart Solutions that Benefit People and the Environment

Governance and Strategy

Yettel develops digital services that support customers, businesses and society. This is one of our core business roles and is embedded in daily operations across the organization, with oversight from the executive leadership team.

Our approach is linked to the Sustainability Strategy 2028, which includes a commitment to **introduce new digital solutions that support sustainability in Bulgaria.**

We focus on services that help customers and businesses:

- use resources more efficiently
- reduce environmental impact
- improve operations
- extend the life of devices
- digitalize processes
- strengthen cybersecurity and protect customer data

Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
Consumers may be excluded if products, services or information are not accessible, affordable or inclusive	⊖ Negative impact	⚙ Own operations ✓ Downstream	🕒 Short-term
Consumers may be negatively affected when marketing is not transparent, accurate or fair, as this can mislead them, create false expectations, or prevent them from making informed choices	⊖ Negative impact	⚙ Own operations ✓ Downstream	🕒 Short-term



Policies

The main framework that guides our actions is Yettel's Sustainability Strategy 2028, which guides the company's work on sustainable products and services.

Other relevant supporting policies help us ensure that new solutions are communicated clearly, designed responsibly and managed securely:

- Responsible Marketing Policy
- Stakeholder Engagement Policy
- Code of Ethics
- Sustainable Sourcing Policy and the e& PPF Supplier Code of Conduct
- Information Security Policy
- Privacy Policy
- Data Protection Rules and Vendor Assessment Procedures

Actions

Yettel's target is to introduce one new solution every year that supports businesses and society in Bulgaria on sustainability.

This year, we exceeded this target by introducing two new services:



Device Buy Back for B2B customers - enables business customers to return used mobile devices for resale, reuse or responsible recycling, while receiving financial value for eligible devices



Video surveillance - provides businesses with a security solution combining cameras, video storage, real-time remote access and centralized management across one or multiple locations



Safeguarding Personal Data

Governance and Strategy

Yettel treats personal data protection as a core part of customer trust. The Executive Leadership Team supports the implementation of **Information Security and Privacy Policy** and is responsible for ensuring that privacy and security risks are properly managed. The Data Privacy Protection Department manages the company's privacy framework, including internal procedures, risk assessments, documentation and the handling of personal data-related requests and incidents. The Data Privacy and Ethics Officer oversees compliance with data protection requirements, advises the business on privacy matters, and acts as a contact point for data subjects and supervisory authorities. Privacy and information security are also governed through internal committees under Yettel's **ISO 27001** and **ISO 27701** management systems. Controls are applied across the full data lifecycle, including collection, use, storage, transfer, retention and deletion.

Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
Improper handling or processing of user data can result in privacy violations, leading to identity theft, financial loss or other personal damages to consumers	⊖ Negative impact	⬆️ Upstream ⚙️ Own operations ⬇️ Downstream	🕒 Short-term
We strengthen customer data protection and increase network resilience to cyberattack and internet fraud	✅ Positive Impact	⬆️ Upstream ⚙️ Own operations ⬇️ Downstream	🕒 Short-term
Continuously supporting innovation in data security can protect a business from the legal consequences of data breach and improve its position with a secure environment	🎯 Opportunity	⬆️ Upstream ⚙️ Own operations ⬇️ Downstream	🕒 Short-term

Policies

Yettel's **Information Security Policy and Privacy Policy** sets the main framework for information security and data privacy. It covers:

risk identification and management	integrity and availability of information	legal compliance
confidentiality	business continuity	business continuity

The **Security Policy** complements this framework by setting additional controls to protect company assets, business processes and third parties. Privacy rights are also recognized in our **Ethics and Compliance Policy**, including when concerns or complaints are raised.

We have a **Data Protection Program** aligned with the **General Data Protection Regulation** with internal rules and manuals on:

privacy notices	complaint handling	vendor privacy assessments
consent management	retention periods	data transfers
data subject rights	data breach response	

We are certified under **ISO 27701**, which supports privacy information management, and we also apply **ISO 27001**-based information security controls.

Actions

Our privacy objectives focus on responsible handling of personally identifiable information, clear internal privacy processes, compliance with legal and contractual requirements, employee awareness of privacy responsibilities, effective complaint handling, timely response to privacy concerns, and continued certification and audit performance. **During 2025, we received and reviewed a total of 209 complaints.**

Data Security Measures

Yettel keeps records of its data processing activities, including logs, decisions and assessments. The company follows a defined retention schedule, so that personal data is no longer needed, it is deleted or anonymized. Before making changes to data processing activities, we review whether the change is necessary and whether it could lead to excessive or inaccurate data use.

We apply technical and organizational measures such as:

encryption	additional authentication for sensitive transactions
anonymization	monitoring security threats
pseudonymization	disciplinary measures for policy violations
stronger identity verification	internal and external audits

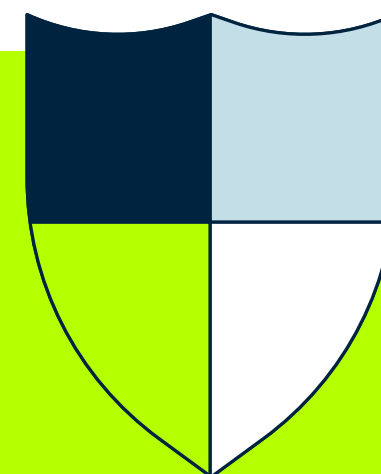
The company also maintains **Business Continuity and Disaster Recovery Plans** for IT and network operations.

1 160
hours

of privacy-related online training completed by our employees in the current reporting period

1 666
additional hours

of AI data protection-related training completed by employees in 2025, reflecting the growing link between privacy, data governance and responsible AI use



Complaints and Reporting Channels

Customers can report privacy concerns through several channels, including the customer service center, stores, social media, website contact forms, email, phone and direct contact with the Data Privacy and Ethics Officer.

Privacy-related concerns are reviewed by the relevant privacy and security teams. Where needed, cases are escalated and followed by corrective actions. Yettel monitors complaints and outcomes to improve its privacy controls and customer protection.

For the **124 substantiated cases regarding breaches of customer privacy identified over the year**, Yettel took corrective action. Disciplinary measures were pursued against 43 employees and 7 cases were referred for prosecution. Affected customers were compensated and any improper charges were reversed.

Vendor Assessments

We continued to assess privacy and security risks in our supply chain to ensure that organizations working with us follow standards that are consistent with our requirements.

78

privacy due diligence assessments of third-party vendors and partners were carried out during the reporting period

Entity Specific Topic: Cybersecurity

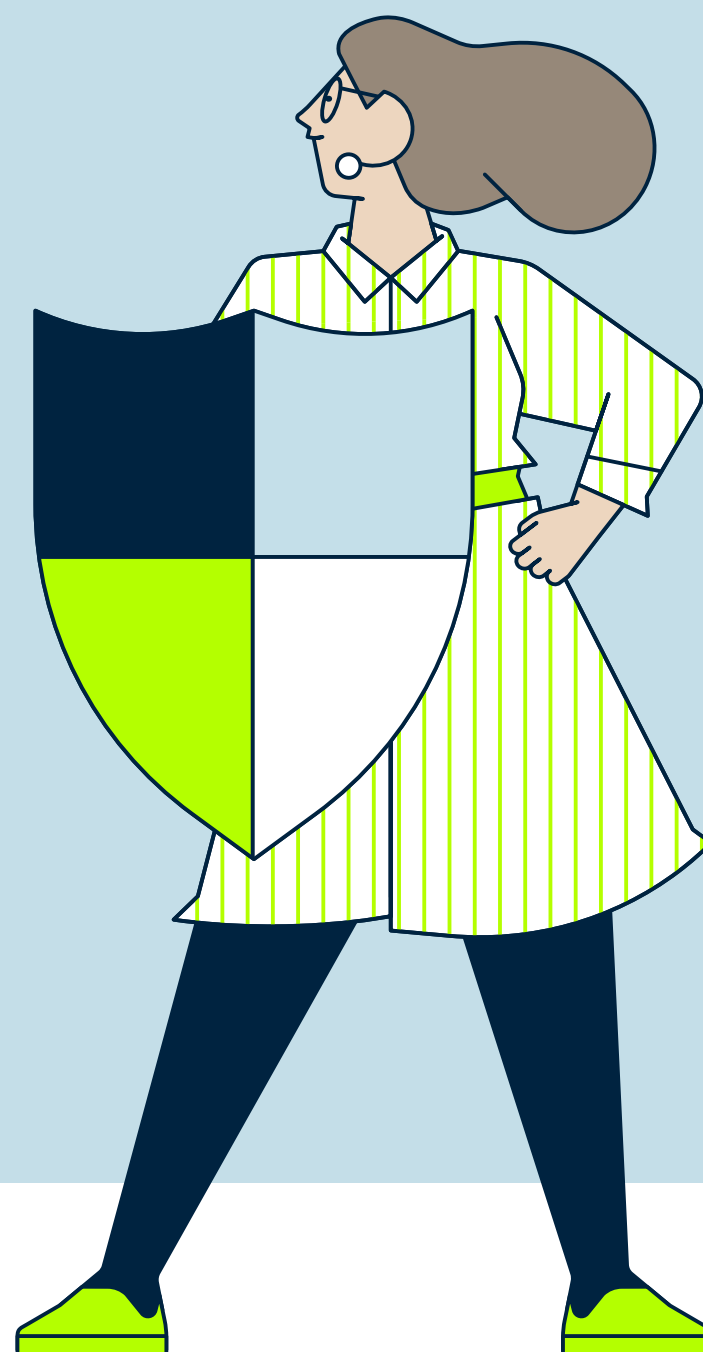
Governance and Strategy

Cybersecurity is essential for keeping our systems, networks and services secure and reliable. As a telecom operator, Yettel's infrastructure supports services used by many people and businesses, so disruptions could affect customers, operations and service delivery.

Cybersecurity is also part of our Sustainability Strategy 2028, under the pillar Tech for Sustainable Future, which includes the commitment to maintain resilient cybersecurity and personal data protection.

Our Security Officer acts as the management representative for security matters. The Security and Privacy Committee oversees cybersecurity and privacy topics, reviews risks and monitors the actions needed to address them, and tracks progress to targets.

We also carry out regular management reviews of our independently certified **Information Security Management System (ISMS)** by working on audit results, corrective actions, risk assessments, progress on risk treatment plans, security objectives, feedback from stakeholders and opportunities for improvement. This helps us keep our cybersecurity approach up to date with changing risks, technologies and best practices.



Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
Lack of data security may have a potential impact on operations and service delivery that could lead to crippling of critical infrastructure, affecting a significant part of the country	⊖ Negative impact	⬆️ Upstream ⚙️ Own operations ⬇️ Downstream	🕒 Short-term
If sensitive data are leaked or misused, it may expose the company to legal actions, leading to significant financial penalties and litigation costs	⚠️ Risk	⬆️ Upstream ⚙️ Own operations ⬇️ Downstream	🕒 Short-term
Cases of compromised personal data can result in negative publicity, diminishing trust among existing and potential customers and damaging our brand's reputation	⚠️ Risk	⬆️ Upstream ⚙️ Own operations ⬇️ Downstream	🕒 Short-term
Effective privacy protections can enhance trust between the company and its customers, fostering loyalty and potentially leading to a loyal end user/customer base	▶️ Opportunity	⬆️ Upstream ⚙️ Own operations ⬇️ Downstream	🕒 Short-term

Policies

Yettel's cybersecurity approach is guided by its **Information Security Policy**, which defines how Yettel ISMS is managed, monitored and improved. The policy sets the main security principles, objectives, controls and ICT standards used to protect Yettel's systems, networks, applications, databases and information assets. The policy also covers key areas such as vulnerability management, incident response, business continuity, third parties' and supply chain security, and compliance with information security and data protection requirements.

Supplier security is further supported by the **Organisational and Technological Security Controls Baselines** and **Third-Party Access Management** process, which set the rules and requirements for remote access, technical and organizational controls, contractual security obligations and the possibility to request audits, security tests or vulnerability scan results from suppliers.

Actions

Management Systems and Controls

Reliable digital services depend on systems that can withstand attacks, disruption and technical failure. Yettel maintains certified management systems that support cybersecurity, service continuity and privacy protection. These include certifications under **ISO/IEC 20000-1:2018, ISO/IEC 27001:2022 and ISO/IEC 27701:2019**.

We apply information security controls across key areas such as access management and remote access control, endpoint security, network security, asset management, supplier security, incident management, business continuity and overall compliance with the regulatory obligations and internal rules.



Incident Management and Supplier Security

Cybersecurity incidents are managed through approved internal procedures for registering, triage, tracking and resolving security events and incidents. We monitor whether reported incidents are closed within the defined Response/Recovery Time Objectives and review any cases the defined targets are not met. Incident management performance is regularly reviewed by the Information Security Department and reported to the Security and Privacy Committee, helping us improve response processes and strengthen service resilience.



89% incident management performance in 2025, surpassing our target of above 85%.

We include a mandatory contractual network and information security agreement in supplier contracts to ensure compliance with our organizational security rules and standards. Suppliers are required to maintain an appropriate information security management program aligned with recognized industry frameworks, participate in periodic security assessments and, where applicable, independent penetration testing, and implement formal vulnerability management and incident management processes to ensure the timely identification, remediation and verification of security issues.

Performance Tracking

We have set measurable cybersecurity performance targets and aim to achieve a score above 85% in each of our main cybersecurity metric areas. This threshold is an internal benchmark used to assess whether our security controls, incident handling and compliance processes are working effectively.

The overall effectiveness of our **Information Security Management System reached 87.5%**, exceeding our target of above 85%

0 non-conformities reported during the reviewed period

100% compliance* with relevant information security requirements, surpassing the target level of above 85%

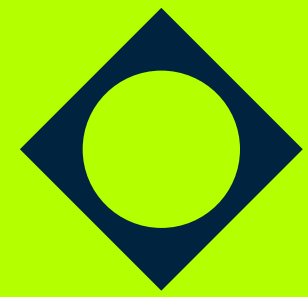
* This score reflects checks on legal, regulatory and contractual obligations, completion of internal compliance reviews and employee compliance with rules on acceptable use and business conduct.

Cybersecurity Training and Awareness



Building cybersecurity awareness among employees remains an important part of our security framework. Over the past year, **1 684 employees** completed cybersecurity training, representing **85.2% of all employees**. Together, they completed **2 252 hours of cybersecurity training**, supporting employees to identify and respond to cyber threats, strengthen security practices across the organization and support the company's overall cyber resilience.

2 252 total hours of cybersecurity training completed by employees in 2025



Acting with Integrity and Transparency

Business Conduct

Governance and Strategy

At Yettel, responsible business conduct is part of how we manage our operations, relationships and decision-making. Ethics, transparency and accountability help us maintain trust with employees, customers, suppliers, partners and other stakeholders, while supporting our role as a provider of reliable connectivity.

Our key governance areas include anti-bribery and anti-corruption, whistleblowing, supplier relationships, payment practices and conflict of interest management. The approach is anchored in **Yettel's Code of Conduct**, which is approved by the Board of Directors and applies across the organization. Yettel's Executive Leadership Team supports ethical awareness and a culture of integrity across the company.

The **Ethics and Compliance Policy** defines how potential conflicts of interest are disclosed, assessed and escalated. Declarations of potential conflicts of interest are reviewed by the Data Privacy and Ethics Officer and the relevant departmental director, while the Board of Directors reviews the most complex cases.

Oversight of the broader compliance framework is provided by the Data Privacy and Ethics Officer, who is responsible for compliance matters, internal investigations, training coordination and regular reporting on the Corporate Compliance Program. The Officer acts independently from any management involved in the matter, handles business ethics investigations and keeps the CEO and the e& PPF Chief Legal and Regulatory Officer informed of significant compliance issues.

Material Impacts, Risks and Opportunities (IROs)

IRO description	IRO category	Value chain	Time horizon
A company culture that tolerates or encourages unhealthy competition, discrimination or harassment can result in a toxic work environment, lower employee morale and higher turnover	⊖ Negative impact	⚙️ Own operations	🕒 Short-term
We strengthen stakeholder trust through transparent governance, integrity and ethical business conduct	⊕ Positive impact	⚙️ Own operations	🕒 Short-term
A culture that places profit above ethics may drive decisions that harm customers, the environment or other stakeholders	⊖ Negative impact	⬆️ Upstream ⚙️ Own operations ⬇️ Downstream	🕒 Short-term
Insufficient protection of whistleblowers may enable unethical business conduct and expose whistleblowers to retaliation	⊖ Negative impact	⬆️ Upstream ⚙️ Own operations ⬇️ Downstream	🕒 Short-term
Unethical lobbying activities and initiatives may improperly influence public policy, regulation and government decision-making related to the company's activities	⊖ Negative impact	⚙️ Own operations	🕒 Short-term
Weak policies, procedures and practices for managing supplier relationships, including payment practices, may lead to poor oversight of supplier selection, treatment and payment, which may undermine trust and long-term relationships with suppliers	⊖ Negative impact	⬆️ Upstream ⚙️ Own operations	🕒 Short-term
Insufficient policies, procedures and practices to prevent bribery and corruption may enable unethical behavior, such as offering, giving, receiving or requesting something of value to influence a person in a position of authority	⊖ Negative impact	⚙️ Own operations	🕒 Short-term

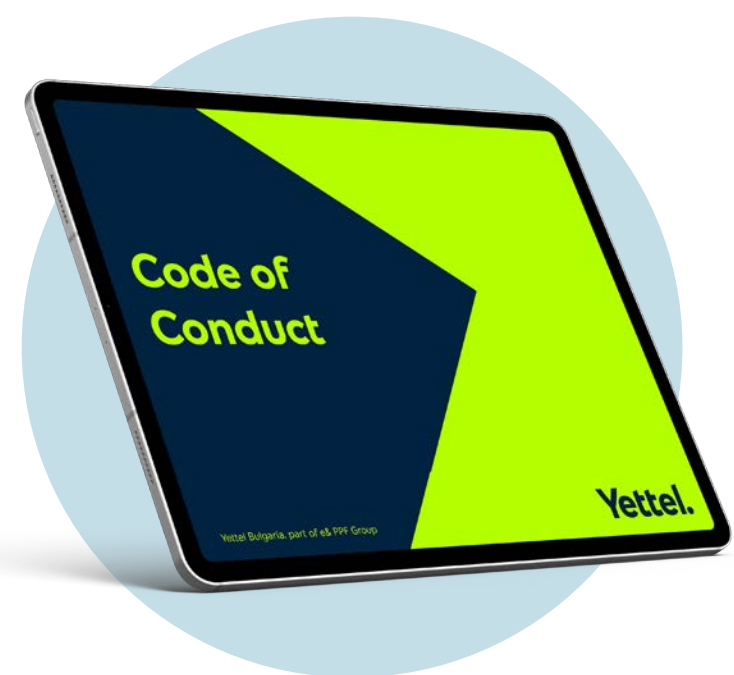
Policies

Yettel's business conduct framework is supported by internal policies, manuals and procedures that define expectations for ethical, responsible and transparent behavior across the company.

Our **Code of Ethics**¹ sets the main principles for employee conduct and serves as the foundation for integrity, honest behavior, compliance with internal rules and legal requirements, and zero tolerance for bribery and corruption.

The **Ethics and Compliance Policy** defines how compliance matters are managed within the company, including anti-corruption, internal investigations and reporting responsibilities. The policy demonstrates a high degree of consistency with international anti-corruption standards and **is assessed as aligned with the United Nations Convention against Corruption**. It is complemented by the **Ethics and Compliance Training Policy**, which sets the approach for assigning, monitoring and reporting training so that employees understand key business conduct expectations, including anti-corruption requirements. Yettel also applies conflict of interest rules, which provide guidance on identifying, disclosing and managing situations where personal interests or relationships could influence objective business decisions. Additionally, in the very beginning of the year, we adopted an **Ethics and Compliance Charter**, setting out the overarching standards and expectations that guide our organizational behavior.

The local **Whistleblowing Manual** establishes our internal reporting mechanism for raising concerns or reporting potential violations. It supports confidential reporting and protects individuals who report concerns in good faith from retaliation. This year we refreshed the Manual to incorporate updated rules of procedure for concerns or signals that fall outside the scope of the Whistleblowers Protection Act, ensuring a unified and transparent approach to all types of integrity related reporting



For our business partners, the **e& PPF Telecom Group Supplier Code of Conduct** sets expectations for responsible behavior, integrity, compliance and ethical conduct throughout the business relationship. Yettel's **Sourcing Manual** defines the procurement and supplier management process, including vendor selection, evaluation, sourcing requirements, payment practices and controls related to supplier relationships. These are further supported by the local **Sustainable Sourcing Policy**, which strengthens sustainability expectations toward business partners, including responsible sourcing and anti-bribery and anti-corruption practices.

¹ For clarity and transparency, at the time of writing Yettel's Sustainability Report 2025, the Code of Ethics has been replaced by a newly adopted Code of Conduct, active as of March 2026. Relevant information throughout this report has been updated to reflect the transition.

Actions

Prevention and Detection of Corruption and Bribery

Certain functions, such as Business Sales and Sourcing (Procurement), as well as related business activities, are generally considered to carry a higher risk of fraud or corruption due to their nature. To address these risks and support fair business practices, we have put several measures in place.

In 2025, we launched **online training** on the Code of Ethics, anti-corruption and corporate gifts and events for all employees. By year-end, **99% of employees had completed** at least one of the three courses. The Code of Ethics is also covered during **in-person onboarding for new employees** in both retail and headquarters roles. Each online course includes the relevant policy as reference material and requires employees to confirm that they have read and understood it.

The Data Privacy and Ethics Officer is responsible for maintaining the ethics and compliance training catalog, defining the necessary topics and target groups and monitoring training completion. Trainings are assigned through a web platform, while line managers are responsible for ensuring that their teams complete them on time. We also continue to work with the Corporate Communications Division to promote ethics and compliance training through internal channels, building on current efforts to strengthen employee awareness of anti-corruption policies and procedures.



There were 0 confirmed corruption incidents or substantiated bribery cases

Conflicts of Interest

At Yettel, we expect professional decisions to be based on objective criteria and aligned with the company's best interests. Potential conflicts of interest may arise when personal factors, such as investments in external entities, family relationships or close personal connections with suppliers, could influence or appear to influence business decisions.

Employees are encouraged to proactively contact their supervisor or the Data Privacy and Ethics Officer for guidance, to raise concerns or to seek advice on potential conflicts of interest. We place emphasis on transparency and disclosure of personal relationships, particularly where they may exist within hierarchical structures. This allows the company to assess the situation and take appropriate measures where needed, such as moving employees to different teams.

Supplier Payment Practices

At Yettel, invoice handling and payment approval follow clear internal procedures. To support timely processing, invoices should reach the Accounting Department within two business days of receipt or no later than the first working day of the following month, and partners are encouraged to submit them electronically.

Payment approvals are subject to different sign-off levels depending on invoice amount, helping ensure accuracy, compliance with financial controls and timely settlement. Specific practices related to SMEs are included in our **Sourcing Manual** to better reflect the needs of smaller suppliers.

As of the end of 2025, there were no outstanding legal proceedings against the company for late payments



Protection of Whistleblowers

We encourage all employees to speak up if they suspect breaches of internal policies, company rules or legal requirements. We make relevant contact details available through our intranet (Yettel Town) and engagement app (Digital Office), and we maintain a [web form](#) that can be used by both employees and external parties to report suspected violations of laws or Yettel's **Code of Conduct**. We also provide a secure internal hotline and offer multiple reporting channels, including email at **compliance@yettel.bg**, phone and personal meetings with the Compliance Team.

Our [whistleblowing mechanism](#) is **fully compliant with the Law on the Protection of Persons who Report or Publicly Disclose Information on Violations**. An appointed employee is responsible for receiving, registering and reviewing whistleblowing reports, maintaining the register of reports and providing regular information to the Central External Reporting Authority and to the CEO. If a violation is confirmed, the case is reported to the CEO and relevant internal functions so that appropriate action can be taken. All reports are handled confidentially and we do not tolerate retaliation against individuals who report in good faith.

Whistleblower protection measures also apply to related persons, such as helpers, relatives and colleagues, and may cover risks such as dismissal, demotion, transfer, negative performance evaluation or discrimination. Where our investigation team confirms violations of our policies or ethical standards, we take appropriate corrective action, including disciplinary measures or contract termination where necessary.

Appendix A: ESG Data Disclosures

Climate change

GHG Emissions

Indicator	Measurement unit	2025	2024
Scope 1 ¹	tCO ₂	919	966
Scope 2	tCO ₂	4	458
Location-based	tCO ₂	1 616	1 750
Market-based	tCO ₂	4	458
Scope 3	tCO ₂	66 053	83 892
3.1 Purchased Goods and Services ²	tCO ₂	49 518	69 959
3.2. Capital Goods	tCO ₂	4 643	6 963
3.3. Fuel and Energy-related Activities	tCO ₂	441	444
3.4. Upstream Transportation and Distribution	tCO ₂	1 550	386
3.5. Waste Generated in Operations	tCO ₂	28	12
3.6. Business Travel	tCO ₂	126	78
3.7. Employee Commuting	tCO ₂	1 345	1 264
3.8. Upstream Leased Assets	tCO ₂	64	6
3.11. Use of Sold Products ³	tCO ₂	5 289	2 864
3.12. End-of-life Treatment of Sold Products	tCO ₂	144	35
3.13. Downstream Leased Assets	tCO ₂	2 906	1 880

Energy consumption

Indicator	Measurement unit	2025	2024
Total energy consumption from fossil sources	MWh	3 867	4 611
Total energy consumption from nuclear sources	MWh	0	498
Total energy consumption from renewable sources	MWh	5 225	4 173
Non-renewable energy production	MWh	0	0
Renewable energy production	MWh	37	40.55
Total energy consumption	MWh	9 092	9 273

¹ As a telecom company our direct emissions do not fall under the EU Emissions Trading System.

² In 2025, as part of an update to our GHG emissions calculation methodology, we reassessed certain expenditure previously allocated to Category 3.1. Where appropriate, it was reallocated to Category 3.2 or excluded from the calculation, limiting comparability with previous years.

³ As part of the 2025 methodology update, the calculation for Category 3.11, Use of Sold Products, was revised to better reflect the number of products sold and their electricity consumption, limiting comparability with previous years.

Resource Use and Circular Economy

Waste

Indicator	2025		2024	
	tonnes	% from total	tonnes	% from total
Total weight of waste generated	183.78	100.00%	95.88	100.00%
Total amount diverted from disposal	129.14	70.27%	75.77	79.02%
Total amount directed to disposal	54.64	29.73%	20.11	20.98%
Hazardous waste	31.09	16.92%	18.70	19.50%
Prepared for reuse	15.90	8.65%	3.92	4.09%
Recycled	15.19	8.26%	14.78	15.41%
Other recovery operations	0.00	0.00%	0.00	0.00%
Total amount diverted from disposal	31.09	16.92%	18.70	19.50%
Incinerated	0.00	0.00%	0.00	0.00%
Landfilled	0.00	0.00%	0.00	0.00%
Other disposal operations	0.00	0.00%	0.00	0.00%
Total amount directed to disposal	0.00	0.00%	0.00	0.00%
Non-hazardous waste	152.69	83.08%	77.18	80.50%
Prepared for reuse	0.00	0.00%	12.32	12.85%
Recycled	94.37	51.35%	44.75	46.67%
Other recovery operations	3.68	2.00%	0.00	0.00%
Total amount diverted from disposal	98.05	53.35%	57.07	59.52%
Incinerated	2.35	1.28%	0.82	0.86%
Landfilled	52.29	28.45%	19.29	20.12%
Other disposal operations	0.00	0.00%	0.00	0.00%
Total amount directed to disposal	54.64	29.73%	20.11	20.97%

Resource inflows

Indicator	Measurement unit	2025	2024
Weight of key materials	Tonnes	222.239	138.757

E-waste

Indicator	Measurement unit	2025	2024
Total amount of e-waste prevented from landfill	kg	65 243	46 855

Own workforce

Characteristics of own workforce

Indicator	Measurement unit	2025			2024		
		Men	Women	Total	Men	Women	Total
Total number of employees	Headcount ¹	790	1199	1989	764	1182	1946
Permanent employees	Headcount	760	1147	1907	700	1106	1806
Temporary employees	Headcount	30	52	82	64	77	141
Employees with non-guaranteed working hours	Headcount			0			0
Employee turnover	%			35%			37%

Social protection

Indicator	Measurement unit	2025	2024
Employees with disabilities	Headcount	75	62
Share of employees with disabilities out of total workforce	%	4%	3%

Employee training and development

Indicator	Measurement unit	2025	2024
Employees who participated in regular performance and career development reviews	%	100%	100%
Average number of training hours per employee	Count	33	38

¹ Active headcount is a monthly average of all company employees excluding employees in off-registration status (such as maternity and paternity leave) and does not represent the full headcount of the company.

Health and safety

Indicator	Measurement unit	2025	2024
Employees covered by an occupational health and safety management system	%	100%	100%
Fatalities due to work-related injuries and ill health	Count	0	0
Fatalities as result of work-related injuries and ill health of other workers working on company's sites	Count	0	0
Recordable work-related accidents	Count	4	2
Rate of recordable work-related accidents ²	Rate	1.1	0.6
Number of cases of recordable work-related ill health, subject to legal restrictions on the collection of data	Count	0	0
Number of days lost to recordable work-related accidents and recordable work-related ill health	Count	90	27

Work-life balance

Indicator	Measurement unit	2025			2024		
		Men	Women	Total	Men	Women	Total
Employees entitled to family-related leave ³	Headcount	790	1367	2157	765	1363	2128
Employees entitled to family-related leave	%	100%	100%	100%	100%	100%	100%

² The frequency rate is calculated based on 1,000,000 hours worked.

³ Employees entitled to family-related leave are reported based on headcount rather than the e& PPF definition of FTE, which excludes employees who are on such leave. This results in a difference between the company's reported total number of female employees and the number of female employees entitled to family-related leave, as employees on maternity, paternity or other family-related leave remain included in this indicator.

Gender diversity in top management

Indicator	Measurement unit	2025			2024		
		Men	Women	Total	Men	Women	Total
Gender distribution at top management level ⁴	Headcount	5	2	7	5	2	7
Gender distribution at top management level	%	71%	29%	100%	71%	29%	100%

Human rights

Indicator	Measurement unit	2025	2024
Number of substantiated incidents of discrimination at work	Count	2	0
Amount of fines, penalties and compensation for damages recognised in the financial statements for incidents of discrimination and other human rights incidents	EUR	0	0
Number of substantiated human rights incidents connected to own workforce	Count	0	0

⁴ Top management level include our Executive Leadership Team (C-suite executives).

Consumers and end-users

Health and safety of products and services

Indicator	Measurement unit	2025	2024
Incidents of non-compliance concerning health and safety impacts of products and services	Count	0	0

Network coverage

Indicator	Measurement unit	2025	2024
5G population covered	%	86.59%	81.75%
5G territory covered	%	41.05%	42.77%
4G population covered	%	99.76%	99.74%
4G territory covered	%	91.02%	90.92%

Network infrastructure

Indicator	Measurement unit	2025	2024
Base stations maintained by CETIN	Count	Near 3870	Near 3250
5G base stations	Count	Near 2200	Near 1400

Digital skills and online safety

Indicator	Measurement unit	2025	2024
Children and young people engaged on online safety	Count	60 309	58 226
Teachers, parents and adolescents involved through digital skills training	Count	12 525	24 524

Innovative solutions

Indicator	Measurement unit	2025	2024
New sustainable solutions introduced	Count	2	2
Business documents signed electronically through Yettel eSign	%	65% as of December 2025	over 40% as of December 2024

Cybersecurity

Network coverage

Indicator	Measurement unit	2025	2024
Employee privacy training hours	Count	1 160	1 011
Vendor privacy assessments	Count	78	84
Reportable personal data breaches	Count	0	1
Severity of reported breach after authority review	Level	N/A	Low

Complaints regarding breaches of customer privacy

Indicator	Measurement unit	2025	2024
Received and reviewed complaints	Count	209	228
Substantiated complaints	Count	124	145
Complaints filed by external parties	Count	83	112
Complaints reported by regulatory bodies	Level	12	12
Complaints recorded through internal channels	Level	29	21

Security management system

Indicator	Measurement unit	2025	2024
Effectiveness of the Information Security Management System	%	87.5%	86%
Information security incident management performance	%	89%	87%
Level of compliance with information security requirements	%	100%	100%
Non-conformities reported	Count	0	0

Business conduct

Corruption and bribery

Indicator	Measurement unit	2025	2024
Number of convictions and sanctions for violation of anti-corruption and anti-bribery laws	Count	0	0
Amount of fines for violation of anti-corruption and anti-bribery laws	EUR	0	0

Political influence

Indicator	Measurement unit	2025	2024
Monetary value of financial and in-kind political contributions made directly and indirectly	EUR	0	0

Payment practices

Indicator	Measurement unit	2025	2024
Legal proceedings currently outstanding for late payments	Count	0	0

Appendix B: GRI and ESRS Disclosures Mapping Index Table

CSRD Disclosures	Corresponding GRI Disclosures	Page
ESRS 2: General disclosures		
BP-1 - General basis for preparation of the sustainability statements; Disclosures in relation to specific circumstances	GRI 2-2; GRI 2-3; GRI 3-1; GRI 2-4; GRI 3-2; GRI 3-3	page 6
GOV-1 - The role of the administrative, management and supervisory bodies	GRI 2-9; GRI 2-12; GRI 2-13; GRI 2-14; GRI 2-17; GRI 405-1	pages 14, 15, 16
GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	GRI 2-12; GRI 2-16; GRI 2-24	pages 10, 11, 12, 15, 21
GOV-4 - Statement on due diligence	GRI 2-23	page 53
GOV-5 - Risk management and internal controls over sustainability reporting	No direct GRI disclosure equivalent	pages 19, 23, 24
SBM-1 - Strategy, business model and value chain (value-creation process)	GRI 2-6; GRI 2-7; GRI 2-22; GRI 3-3; GRI 201-1	pages 7, 8, 9, 13
SBM-2 - Interests and views of stakeholders	GRI 2-12; GRI 2-29	pages 15, 17, 18
SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	GRI 2-27; GRI 3-2; GRI 3-3; GRI 201-2; GRI 306-1; GRI 308-2; GRI 413-2; GRI 414-2	pages 10, 11, 12, 13, 20, 21
IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities	GRI 2-14; GRI 3-1	pages 20, 21
IRO-2 - Disclosure requirements in ESRS covered by the undertaking's sustainability statement	GRI 3-2	This disclosure requirement is covered by this table, i. e. Appendix B
ESRS E1: Climate change		
SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	GRI 201-2	pages 22, 23, 24
IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities	GRI 3-1; GRI 201-2	pages 22, 23, 24
E1-1 - Transition plan for climate change mitigation	GRI 3-3; GRI 305-5	pages 23, 24
E1-2 - Policies related to climate change mitigation and adaptation	GRI 3-3; GRI 302 (Management of material topics); GRI 305 (Management of material topics)	page 23
E1-3 - Actions and resources in relation to climate change policies	GRI 3-3; GRI 201-2; GRI 302 (Management of material topics); GRI 305-5	pages 23, 24
E1-4 - Targets related to climate change mitigation and adaptation	GRI 3-3; GRI 302 (Management of material topics); GRI 305-1; GRI 305-2; GRI 305-3; GRI 305-5	pages 23, 24
E1-5 - Energy consumption and mix	GRI 302-1; GRI 302-3	pages 25, 26
E1-6 - Gross Scopes 1, 2, 3 and Total GHG emissions	GRI 305-1; GRI 305-2; GRI 305-3; GRI 305-4	pages 25, 26, 27
E1-9 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	GRI 201-2	pages 23, 24

CSRD Disclosures	Corresponding GRI Disclosures	Page
ESRS E5: Resource use and circular economy		
IRO-1 - Description of the processes to identify and assess material resource use and circular economy and marine related impacts, risks and opportunities	GRI 3-1; GRI 301 (Management of material topics); GRI 306 (Management of material topics)	pages 20, 21
E5-1 - Policies related to resource use and circular economy	GRI 3-3; GRI 301 (Management of material topics); GRI 306 (Management of material topics)	page 28
E5-2 - Actions and resources related to resource use and circular economy	GRI 3-3; GRI 301 (Management of material topics); GRI 306 (Management of material topics); GRI 306-2	pages 29, 30, 31, 32, 33, 34
E5-3 - Targets related to resource use and circular economy	GRI 3-3; GRI 301 (Management of material topics); GRI 306 (Management of material topics)	pages 32, 33
E5-4 - Resource inflows	GRI 301-1; GRI 301-2; GRI 306-1	page 29
E5-5 - Resource outflows	GRI 301-3; GRI 306-2; GRI 306-3; GRI 306-4; GRI 306-5	pages 32, 33, 34
S1 - Own workforce		
SBM-2 - Interests and views of stakeholders	GRI 2-29	pages 39, 40
SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	GRI 3-3; GRI 203-2	pages 36, 43, 45, 49
S1-1 - Policies related to own workforce	GRI 2-23; GRI 2-25; GRI 401/402/403/404/405/406/407/408/409 (Management of material topics); GRI 403-1; GRI 403-3; GRI 404-2	pages 36, 43, 45, 49
S1-2 - Processes for engaging with own workers and workers’ representatives about impacts	GRI 2-29; GRI 3-3	pages 37, 38, 39, 40, 41, 42, 43, 44, 46, 47, 48, 50, 51
S1-3 - Processes to remediate negative impacts and channels for own workers to raise concern	GRI 2-25; GRI 2-26; GRI 403-2	pages 40, 45, 46, 70
S1-4 - Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	GRI 2-24; GRI 3-3; GRI 203-2; GRI 403-9; GRI 403-10	pages 37, 38, 39, 40, 41, 42
S1-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	GRI 3-3	pages 35, 41, 44, 46, 50
S1-6 - Characteristics of the undertaking’s employees	GRI 2-7; GRI 401-1; GRI 405-1	page 36
S1-9 - Diversity metrics	GRI 405-1	page 46
S1-10 - Adequate wages	GRI 202-1	page 37
S1-11 - Social protection	GRI 401-2; GRI 403-6	pages 43, 44
S1-12 - Persons with disabilities	GRI 405-1	page 46
S1-13 - Training and skills development metrics	GRI 404-1; GRI 404-3	pages 49, 50, 51

CSRD Disclosures	Corresponding GRI Disclosures	Page
S1-14 - Health and safety metrics	GRI 403-8; GRI 403-9; GRI 403-10	pages 43, 44
S1-15 - Work-life balance metrics	GRI 401-3	This disclosure requirement is covered by the corresponding table in Appendix A
S1-17 - Incidents, complaints and severe human rights impacts	GRI 2-27; GRI 406-1	pages 43, 44
S2 - Workers in the value chain		
SBM-2 - Interests and views of stakeholders	GRI 2-29	pages 53, 54
SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	GRI 3-3; GRI 203-2	page 53
S2-1 - Policies related to value chain workers	GRI 2-23; GRI 2-25; GRI 401/402/403/404/405/406/407/408/409 (Management of material topics); GRI 408-1; GRI 409-1	page 54
S2-2 - Processes for engaging with value chain workers about impacts	GRI 2-29; GRI 3-3	pages 54, 55
S2-3 - Processes to remediate negative impacts and channels for value chain workers to raise concerns	GRI 2-25; GRI 2-26	page 55
S2-4 - Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	GRI 2-24; GRI 2-25; GRI 3-3; GRI 203-2; GRI 403-7	pages 54, 55
S4 - Consumers and end-users		
SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	GRI 3-3; GRI 406/416/417/418 (Management of material topics)	pages 56, 59, 61, 63, 65
S4-1 - Policies related to consumers and end-users	GRI 2-23; GRI 2-25; GRI 406/416/417/418 (Management of material topics)	pages 57, 60, 61, 63, 66
S4-2 - Processes for engaging with consumers and end-users about impacts	GRI 2-29; GRI 3-3	pages 58, 59, 64, 67
S4-3 - Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	GRI 2-25; GRI 2-26; GRI 418-1	pages 58, 59, 60, 63, 64, 66, 67
S4-4 - Taking action on material impacts on consumers and endusers, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	GRI 2-24; GRI 2-25; GRI 3-3; GRI 203-2; GRI 406-1; GRI 416-2; GRI 417-2; GRI 417-3; GRI 418-1	pages 57, 58, 59, 60, 61, 62, 63, 64, 66, 67
S4-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (consumers and end-users)	GRI 3-3; GRI 416/417/418 (Management of material topics)	pages 56, 57, 58, 63, 64, 67

CSRD Disclosures	Corresponding GRI Disclosures	Page
G1 - Business conduct		
GOV-1 - The role of the administrative, supervisory and management bodies	GRI 2-9; GRI 2-12	pages 14, 15, 16
IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities	GRI 3-1	page 68
G1-1 - Business conduct policies and corporate culture	GRI 2-16; GRI 2-23; GRI 2-24; GRI 2-26; GRI 205 (Management of material topics)	pages 9, 69
G1-2 - Management of relationships with suppliers	GRI 204 (Management of material topics); GRI 308 (Management of material topics); GRI 308-1; GRI 414 (Management of material topics); GRI 414-1	page 70
G1-3 - Prevention and detection of corruption and bribery	GRI 2-13; GRI 2-16; GRI 2-26; GRI 205-1; GRI 205-2	page 69
G1-4 - Incidents of corruption or bribery	GRI 2-27; GRI 205 (Management of material topics); GRI 205-3	page 69
G1-6 - Payment practices	No direct GRI disclosure equivalent	page 70