Sustainability Report

Bulgaria 2024

Yettel.

Table of Contents

Foreword from the CEO

In 2024, Yettel Bulgaria made substantial progress in delivering on its sustainability commitments – the result of consistency, focused efforts and strategic investments. As part of e& PPF Telecom Group, we are proud to contribute to the Group's climate goals, now officially validated by the Science Based Targets initiative (SBTi).

For the first time, our annual report has been prepared in line with the new Corporate Sustainability Reporting Directive (CSRD), even before the company formally falls within its scope. This proactive approach allows us to be better prepared for the evolving requirements, ensuring greater transparency and comparability of our data.

At Yettel, we believe that telecommunications can be a powerful driver of environmental and social transformation. That is why we continue our efforts to decarbonize the sector and support the transition towards a more sustainable, low-carbon economy. The first full year of our Power Purchase Agreement (PPA) for renewable electricity with Electrohold, in partnership with CETIN Bulgaria, is clear proof of this commitment. Thanks to it and our own solar generation and more efficient energy use, **we achieved a 60% reduction in Scope 1 and Scope 2 carbon emissions compared to our baseline year 2022**.

Effective resource use and waste management is another essential part of our strategy. We aim to support customers at every stage of their device lifecycle – from extending product use through diagnostics and repairs in our repair center to creating accessible solutions for recycling. Furthermore, with our awareness campaigns on e-waste, Yettel's Recycler, in 2024 we reached over 218,000 people across Sofia and Plovdiv. **Once again, we reported year-on-year growth in the volume of devices prevented from ending up in landfills – 46,855 kg. in 2024 alone**. We are also proud of our new buyback service for our business clients. It enables them to responsibly return functional devices and recover their residual value.

The credit for everything we have achieved belongs to our people. We are proud that for the second consecutive year, we received the Top Employer certification – a high recognition for our employer practices and corporate culture, where sustainability is strongly embedded. In 2024, we dedicated 1,082 hours of volunteering, supporting people in need and protecting nature. With our Online Safety and Digital Literacy program – one of Yettel's most impactful social initiatives, **we reached over 58,000 children on the topic of digital safety and equipped nearly 24,000 people with essential digital skills**.

Jason King
CEO, Yettel Bulgaria

This year, we deepened our collaboration with suppliers, as we believe change must encompass the entire value chain. The first stage of our risk assessment highlighted strengths and weaknesses and laid the foundation for open dialogue and idea exchange. Our next step is already underway: to transform this dialogue into joint actions through meetings, events and initiatives that will lead to a long-term impact.

Finally, I want to highlight our ambitions and strong progress in digital transformation – reshaping how we create value for our customers. The digital economy is no longer a distant future, it is a present opportunity that we are actively developing. I am confident **that our network, honored for the eighth consecutive year with the prestigious Best in Test certification** by the independent organization umlaut, part of Accenture, provides the solid foundation on which we are building the next generation of digital experiences.

2024 Performance Highlights

🏬	Retail network of **181** stores
👤	Number of active mobile users: **3.378 mln.**[1]
%	Market share (%, mobile-service-revenue-based): **36.6%**
♻	Achieved **3.5%** reduction in **Scope 1, 82%** reduction in **Scope 2** and **44%** reduction in **Scope 3** greenhouse gas (GHG) emissions since 2022
⟲	Prevented **46,855 kg. of e-waste** from going to landfills
🤝	Launched first **supplier engagement campaign**
💝	Implemented local **DEI Policy** and launched **Unconscious Bias Training** for all employees at our headquarters

[1]This definition includes mobile customers, M2M, hybrid fix and FWA (excluding TV).

Network Coverage

■ 2023 □ 2024

	Total network coverage 4G and above (% of population covered)	Total network coverage 5G and above (% of population covered)	Total network coverage 4G and above (geographic coverage)	Total network coverage 5G and above (geographic coverage)
2023	99.67%	71.36%	90.10%	23.38%
2024	99.74%	81.75%	90.92%	42.77%
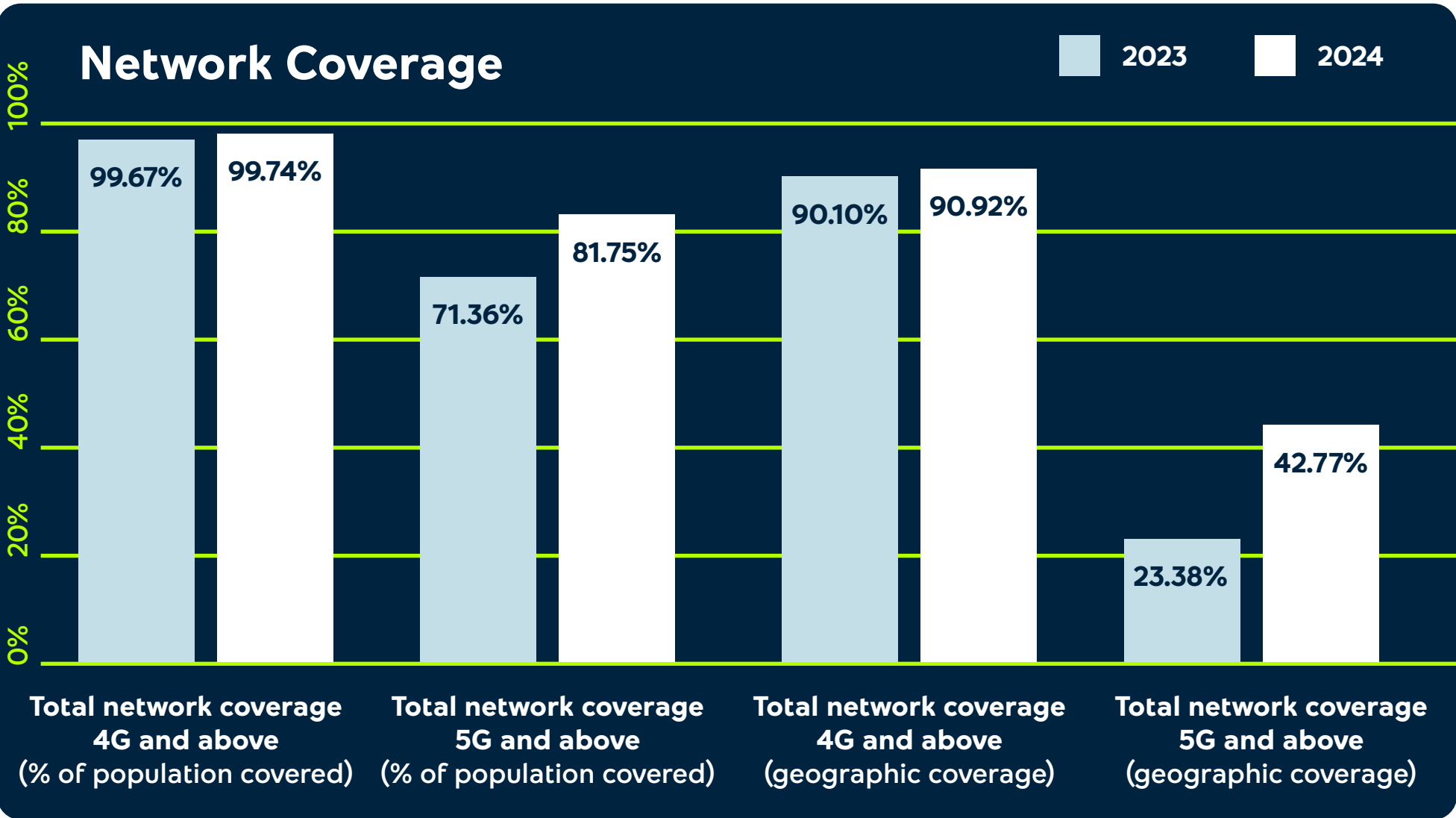
General Information

Creating transparency and fostering sustainable development are central to Yettel Bulgaria's business activities. As Yettel Bulgaria (hereon referred to as the "company", "Yettel" and "we") presents the company's 2024 Sustainability Report, we reference the **Corporate Sustainability Reporting Directive (CSRD)** and the accompanying **European Sustainability Reporting Standards (ESRS)**, while simultaneously reporting in accordance with the **Global Reporting Initiative's Standards (GRI)**. While this report is not fully compliant with the CSRD and ESRS requirements, we have embraced elements of these frameworks to enhance the depth and specificity of our sustainability disclosures beyond the company's previous GRI reports.

The report has been **prepared on a voluntary basis**, as Yettel Bulgaria falls out of scope of the CSRD for the reporting year 2024. Nevertheless, by voluntarily aligning with both ESRS principles and the GRI Standards, Yettel Bulgaria reinforces its commitment to international methodologies for non-financial reporting, ensuring the disclosed information remains accurate, traceable and comparable.

Moreover, our support for strategic coherence with the **United Nations' Sustainable Development Goals (SDGs)** underscores our efforts to address and contribute positively to the global challenges.

This report represents Yettel Bulgaria's continued dedication to integrating sustainability into our business strategy, as outlined in our **Sustainability Strategy 2028**. Through in-depth materiality assessments, we have gained a clearer understanding of our environmental and social impact. As a result, we were able to identify the most relevant ESG (environmental, social and governance) risks, opportunities and priorities that shape our operations and guide our strategic decisions. This 2024 report, covering the period from **1st January 2024** to **31st December 2024**, aligns with our financial reporting cycle and includes data from all business operations: retail locations, corporate offices, warehouse, central administrative building, repair centre and direct suppliers in our supply chain.

The Executive Leadership Team of Yettel Bulgaria has reviewed the contents of this Sustainability Report to ensure its adherence to our internal standards and the international frameworks. Though not externally audited, the report reflects our integrity and transparency in sustainability reporting. Prepared in both English and Bulgarian, the report is available on our corporate website as of **25 September 2025**.

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

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.

General Basis for Preparation of the Sustainability Statement

This Sustainability Report for the financial year 2024 has been prepared on an individual and voluntary basis.

This sustainability statement covers the company's own operations and upstream and downstream value chain. The entire value chain was considered in our materiality assessment to identify impacts, risks and opportunities (IROs). The materiality assessment, on which this report is based, was prepared for the 2024 financial year in accordance with the ESRS, showcasing our commitment towards future full compliance with the CSRD.

Our policies, actions and targets cover the material impacts, risks and opportunities along the entire value chain, unless stated otherwise.
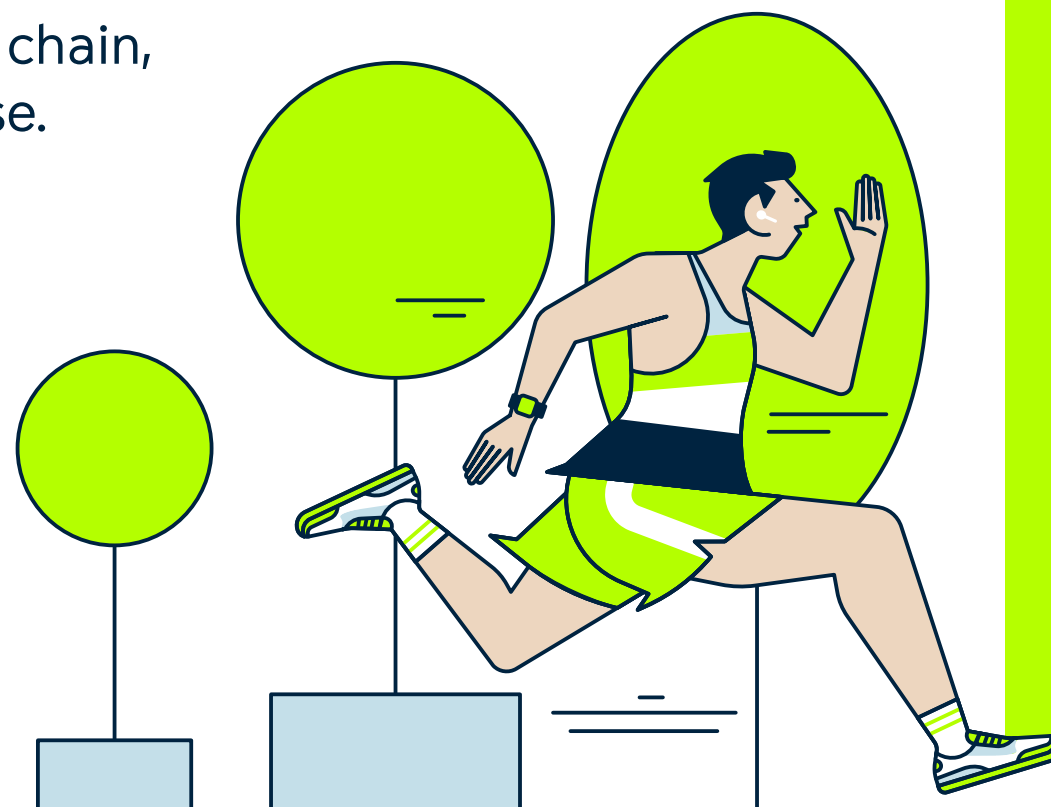
Disclosures in Relation to Specific Circumstances

Time horizons

The time horizons used in this Sustainability Report are the same as the ones recommended and listed in ESRS 1_6.4, corresponding to the following time periods:

Short-term

The reporting period following the current reporting period
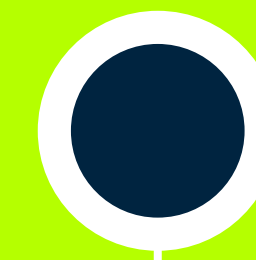
Between 0-1 years from the start date of the 2024 reporting period (i.e., by the end date of the 2024 reporting period)

Medium-term

The reporting period from the end of the short-term reporting period up to the fifth reporting period
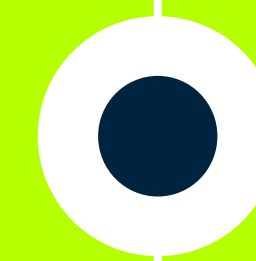
Between 1-5 years from the 2024 reporting period (i.e., from the start date of 2025 reporting period up until the end date of the 2029 reporting period)

Long-term

The reporting period of more than five years up to the tenth year after the current reporting period
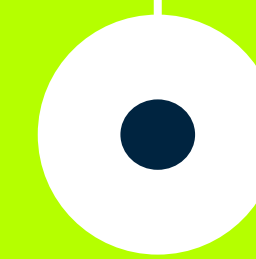
Above 5 years from the 2024 reporting period (i.e., from the start date of 2030 reporting period onward)

**Sources of
Estimation
and Outcome
Uncertainty**

Topic	Disclosure Requirement	Metric	Description and Cause of Uncertainty
ESRS E1 Climate Change	E1-6-44	Total greenhouse gas emissions, measured in metric tons of CO2 equivalent, for Scope 3 categories	For the calculation of our Scope 3 emissions, we relied on estimates due to insufficient primary data, especially in the supply chain, and a shortage of product-specific emissions factors.
ESRS E5 Resource Use and Circular Economy	E5-6	Waste generated in operations, treatment of general waste	For the calculation of the total waste generated by the company and its split into categories, where information was not directly provided by the third-party treating the waste, we used both weight estimation using average values by device type and site-level estimates using proxy data for determining overall waste volume, and the EU statistics to estimate waste treatment methods.

Changes in Preparation or Presentation of Sustainability Information

Specific information on the differences in the ways we calculate certain metrics can be found in sections **"Climate Change"**, sub-section **"Energy and GHG Emissions Metrics",** (page 31) and **"Own Workforce"**, sub-section **"Diversity, Inclusion and Equity – Diversity Metrics",** (page 47).

Reporting Errors in Prior Periods

In our 2023 Sustainability Report we have stated 1,400 5G C-Band base stations in section 4.1 "Tackling the digital divide by providing reliable connections to all", while in reality we had 1,400 5G base stations, the majority of which operate on the C-band frequency.

Disclosures Stemming from Other Legislation or Generally Accepted Sustainability Reporting Pronouncements

In this report, we have incorporated several disclosures based on the **GRI standards**, to ensure that all sustainability information relevant for Yettel has been included. For more information, see **Appendix A** (page 74).

Business Model, Strategy and Value Chain

Our Business Model

Yettel Bulgaria EAD, a wholly owned subsidiary of **e& PPF Telecom Group** (hereon referred to as "the Group"), is a leading mobile telecommunication service provider in Bulgaria, ranking first by revenue and third by subscriber market share, serving over three million customers. Yettel offers a comprehensive range of telecommunication services, including mobile voice, data and text messaging, as well as television, fixed broadband and fixed voice services utilizing its mobile network. We also provide corporate data network solutions and content services for both postpaid and prepaid customers.

In 2024, we have been busy **developing exciting services and offering new products to our customers**. We pride ourselves on delivering high-quality voice and data connectivity through our advanced 4G and 5G networks, equipped with VoLTE technology. Building on this strong foundation and following the success of our Yettel TV service introduced in mid-2023, we've rolled out three more innovative offerings.

We were proud to introduce **Smartphone Diagnostic**, a service customers can access through our Yettel app, designed to simplify the process of identifying smartphone issues, potentially extending their lifespan and supporting sustainable use of electronic devices.

Working together with CETIN, we have developed a state-of-the-art **Software-Defined Wide Area Network (SD-WAN)** service for our business customers. Using Fortinet technology, we are helping companies improve their network flexibility, reliability and efficiency.

We have also expanded our entertainment options by teaming up with **SkyShowtime**, one of Europe's newest streaming platforms. Our subscribers can now enjoy a wide range of high-quality content, either as part of selected mobile plans, or as a standalone service.

By offering a diverse array of services, we aim to connect our customers with people, devices and businesses, solidifying our position as the leading telecommunications provider on the Bulgarian market.

Yettel maintains a robust commercial presence throughout Bulgaria, which is backed up by our numbers – **in 2024, our revenue came to above 535 million euros**. Yettel also has an extensive network of **181 stores** nationwide, supported by **16 corporate offices**. This widespread retail presence ensures that our products and services are easily accessible throughout the country. Our operations are anchored by a headquarters in Sofia, the capital of Bulgaria, along with a dedicated repair center and warehouse facility.

In 2024 we had 1,946 employees who contributed to ensure the satisfaction of our customers and the smooth operation of our services across Bulgaria.

In addition to its physical locations, Yettel has embraced digital channels to enhance customer accessibility. A majority of our services are available through **our company website and our user-friendly smartphone app**, available for both Android and iOS devices.

Our commitment to innovation has been demonstrated by our technological leadership over the past two decades. We launched Bulgaria's first commercial 4G network in 2015, followed by the introduction of a 5G network in 2021. This track record shows our dedication to maintaining our position as leaders in technological advancement. Our efforts have not gone unnoticed, as we have consistently been awarded the prestigious **Best in Test certificate for network quality**. We have received this recognition for several consecutive years and once again in 2024, further solidifying our position as a frontrunner in providing high-quality, reliable telecommunications services to our customers.

Moving forward, Yettel remains dedicated to the role of a technology leader, continuously providing cutting-edge yet accessible mobile and fixed telecommunications solutions. We strive to anticipate and meet our customers' evolving needs while driving continued progress in Bulgaria's telecommunications sector.

►CETIN

CETIN Bulgaria, part of the CETIN Group within the e& PPF Telecom Group, is **responsible for managing the infrastructure and wholesale activities that support Yettel's connectivity services**. This strategic partnership allows Yettel to concentrate on enhancing its products and services, while CETIN oversees the telecommunication and IT infrastructure.

As one of Bulgaria's largest electronic communications network operators, CETIN Bulgaria provides an impressive coverage of over 98% of the country's highways and first- and second-class roads. In areas with 5G availability, the network offers download speeds of up to 1 Gbps. The company's infrastructure includes a nationwide fiber optic network featuring two optical rings, ensuring reliable connectivity between all points of presence.

In Sofia, CETIN Bulgaria operates its own optical network, providing extensive coverage of the city and its surrounding areas. The company's data services are delivered via a DWDM network, while optical transborder connections to Serbia and Greece extend the reach of the domestic network. Furthermore, CETIN owns and runs two Data Centres, located in Sofia and Plovdiv.

CETIN Bulgaria's capabilities extend beyond national borders. Through partnerships with international entities, the company offers international leased lines, including both Layer 2 and Layer 3 services. This comprehensive infrastructure and service portfolio positions CETIN Bulgaria as a crucial player in the country's telecommunications landscape, supporting Yettel's ability to deliver high-quality connectivity services to its customers.

Our Values

At Yettel, we believe that technology should make life easier for everyone. This belief forms the foundation of our mission: to be a trusted partner for our customers as they explore the digital world. We recognize that building trust in our company begins from within, which is why we prioritize the creation of a supportive work environment. **Our core values - being simple, helpful, fast and responsible** - serve as guiding principles in our efforts to foster a more interconnected society. We strive to ensure that our technological solutions benefit all our stakeholders, including customers, employees and partners.

Our commitment to responsibility is particularly reflected in our approach to sustainability. We are dedicated to doing business in a responsible manner, ensuring that the products and services we offer are safe, environmentally friendly and socially conscious. This commitment extends to minimizing any potential harm to both people and the environment.

By adhering to these principles, we aim to create a positive impact that extends beyond our immediate business operations, contributing to a more sustainable and connected world.

Simple

Fast

Responsible

Helpful
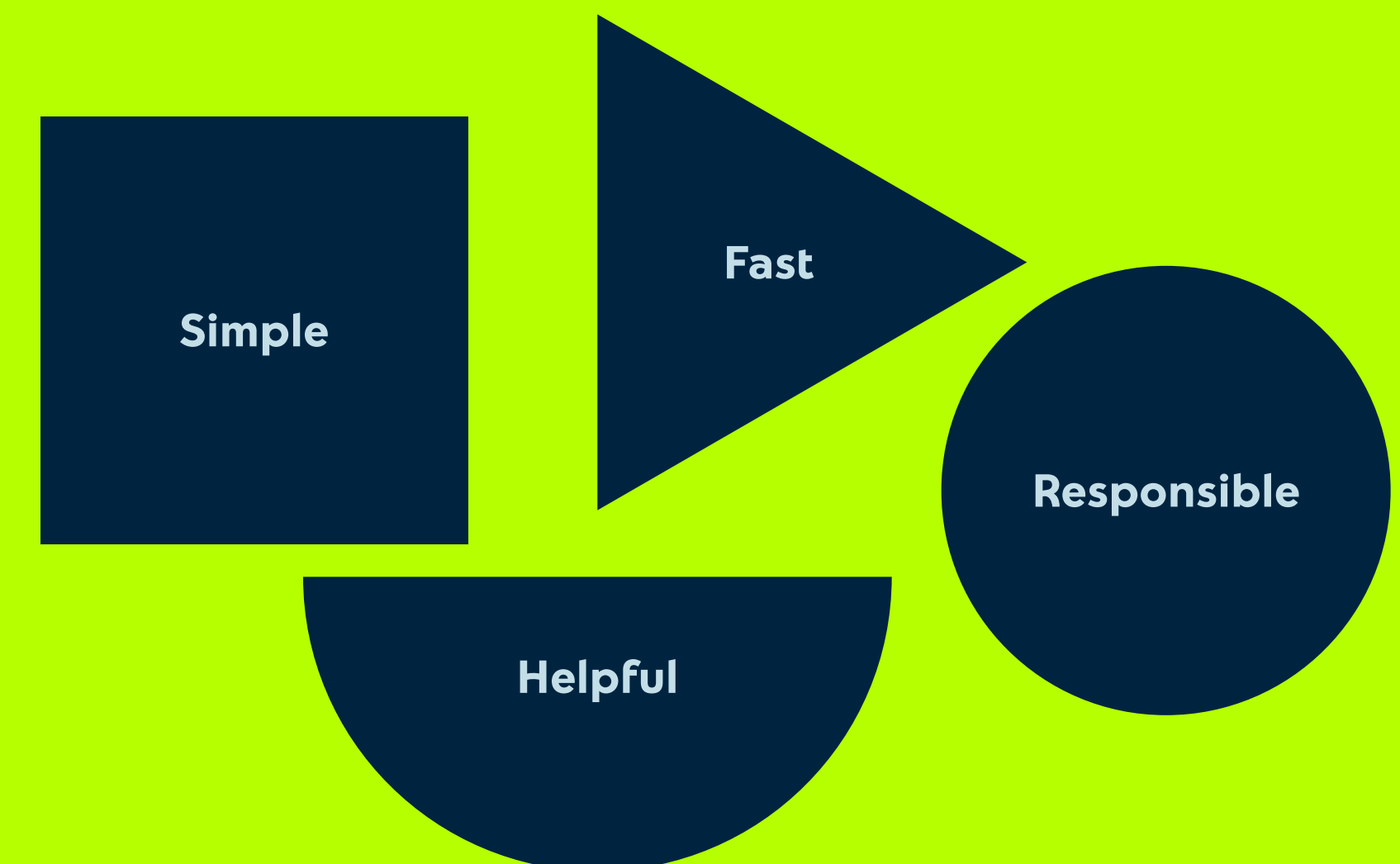
Our Sustainability Strategy 2028

Yettel Bulgaria is actively working towards a sustainable future, **guided by the e& PPF Telecom Group's shared Sustainability Strategy**. We played a key role in identifying the most important sustainability issues for the entire Group, forming the basis of our own localized strategy. Our **local strategy** received full endorsement from Yettel Bulgaria's senior and executive management, demonstrating strong leadership commitment to driving sustainability within the company. While making decisions about our local strategy, Yettel's management always considers our company's material impacts, risks and opportunities.

Our strategy includes specific policies, actions and SMART[1] targets, focusing on how the telecommunications industry can effectively address current economic, social and environmental challenges. These sustainability efforts are **designed to work hand in hand with our broader business objectives**.

At Yettel Bulgaria, we believe that integrating sustainability into our core operations allows us to use our industry position to make a real difference. This is why we systematically assess the current and anticipated effects of our material impacts, risks and opportunities, integrating them into our strategic planning to mitigate negative impacts, amplify positive ones, minimize risks and capitalize on opportunities across our business model, value chain and decision-making processes. This strategic approach enables us to pursue our business goals while simultaneously contributing to a better society and improved environmental conditions.

[1] SMART targets are Specific, Measurable, Achievable, Relevant and Time-Bound

Environment

Reduce our CO$_2$ emissions* in Scope 1, 2, 3

Collect 127,000 kg. e-waste and prevent it from going to landfill

40% less packaging waste in our operations

People

40% women in our technology division

At least 1,000 volunteering hours spent by our employees annually helping others and the planet

2,500,000 people reached out on sustainable living every year

Tech for Sustainable Future

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

1 new solution every year, supporting businesses and society in Bulgaria towards sustainability

Engage 40,000 children on online safety and **equip 10,000 people** with digital skills every year

Resilient cybersecurity & personal data protection

Acting with Integrity

Train 100% of senior management & 50% employees on sustainability by end of 2023

Develop a supplier engagement plan on sustainability by the end of 2024

* e& PPF Telecom Group's GHG emission reduction targets, aligned with the Science Based Targets initiative's target-setting criteria, have been validated in early 2025. The group is now working on detailed Climate Transition Plan, which will determine the individual contributions of each Group member.

Environment

Protecting the environment and its resources is fundamental to Yettel's values. We are dedicated to minimizing our environmental footprint across our operations and entire value chain through our stringent policies, including our **Climate Change Policy**, **Circular Economy Policy**, **Sustainability Policy**, **Sustainable Sourcing Policy**, as well as our **Environmental and Energy Efficiency Policy**. This involves reducing our energy and fuel consumption, increasing our use of renewable energy and improving the management of both the materials we use and the waste we generate. We are committed to leveraging the latest technologies to help us achieve these important environmental objectives.

Environmental targets, part of our 2028 Sustainability Strategy:

Reduce our CO$_2$ emissions in Scope 1, 2, 3

Prevent 127,000 kg. e-waste from going to landfill

40% less packaging waste from our own operations

We are on the path to achieving these targets by developing a dedicated program to reduce our greenhouse gas emissions, integrate circular economy principles into our operations and maintain and improve our sustainable packaging practices.

People

At Yettel, we believe that positive change happens when people work together towards shared goals. We are dedicated to creating an inclusive and equitable workplace where every employee feels supported in their personal and professional growth. We encourage our employees to participate in volunteering programs focused on social and environmental responsibility. We also work to educate our customers about sustainable living. This reflects our commitment to promoting growth, community engagement and environmental consciousness, both within Yettel and throughout the wider community.

Social targets, part of our 2028 Sustainability Strategy:

40% women in our technology division

At least 1,000 volunteering hours spent by our employees annually helping others and the planet

2,500,000 people reached out on sustainable living every year

We plan on meeting these targets through the following actions:

How We Will Achieve Our Goals

Initiatives for our internal stakeholders

Training opportunities for all employees

Career change and progression

Initiatives for our external stakeholders

Educational campaigns and campaigns on sustainable living

For all stakeholders

Inclusion programs

Engaging our employees in volunteering initiatives for external beneficiaries

Uniting our employees in ESG Crews that supports the transition of colleagues towards more sustainable lifestyle, which also benefits the society

Technology for Sustainable Future

Yettel is dedicated to using technology to build a more sustainable future. We aim to contribute to the digital economy by providing inclusive and secure connectivity, and by continually developing solutions that benefit businesses, individuals and the environment.

**Technological targets, part of our
2028 Sustainability Strategy:**

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

Introduce **1 new solution every year**, supporting businesses and society in Bulgaria towards sustainability

Engage 40,000 children on online safety and **equip 10,000 people** with digital skills every year

Ensure resilient cybersecurity & personal data protection

When it comes to achieving these targets, our key focus areas include expanding and enhancing connectivity, promoting digital literacy and creating innovative solutions for all our stakeholders.

Acting with Integrity and Transparency

We aim to integrate our Sustainability Strategy more effectively into our business operations by raising awareness and building a culture of support among both employees and suppliers. Their understanding and engagement are key to achieving our sustainability goals.

**Governance targets, part of our
2028 Sustainability Strategy:**

Continue **training our senior management & employees on sustainability**

Continue expanding our **supplier engagement program on sustainability**

To achieve these sustainability goals, we are focusing on two key areas: providing sustainability-related training for all employees, including senior management, and actively engaging with our suppliers through a dedicated engagement plan.

Our Value Chain

At Yettel Bulgaria, we recognize the importance of understanding our value chain to enhance our performance and assess our impact across various operational stages. This process, known as value chain mapping, is especially significant in our industry due to its complexity and the wide range of stakeholders involved.

Our sector's environmental footprint is diverse, spanning from raw material extraction to the devices' end-of-life. It includes the production and assembly of electronic equipment, packaging, transportation and the energy consumed by networks and devices. Additionally, our value chain encompasses social aspects such as protecting human rights and providing access to digital services.

We recognize the importance of operating responsibly and transparently, in full compliance with applicable laws and regulations. This approach has far-reaching effects on both environmental and social outcomes. Our overall impact is shaped by our activities and relationships with various stakeholders.
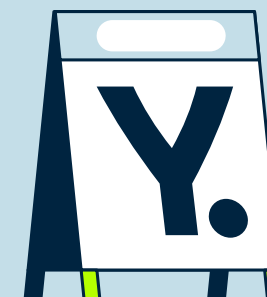
Assessment of ESG IROs is done in collation with multiple stakeholders including Yettel's Risk Manager, ensuring that our sustainability-related IROs are thoroughly evaluated and integrated into our strategic planning.

Upstream Value chain
Sourcing of products and services

Own operations
Our internal processes

Downstream Value Chain
Distribution, use and disposal of products and services

Our upstream value chain is particularly important, as we source a broad range of products and services (from electronic devices to network equipment) from large multinational companies. These items are either sold directly to our customers or used in Yettel's network and business operations. The production process involves several key stages: mineral extraction and refinement, component manufacturing, product assembly, testing, packaging and distribution, each carrying potential risks and impacts on environmental and human factors.

Mobile telecommunications are Yettel's primary service offering. As technology evolves, we continually upgrade our products and services, with a particular focus on 5G technology. This allows for improved data transfer volumes and overall efficiency. We ensure that the products and services we offer are made available through both our physical retail network and online platforms, supported by various communication channels. Acknowledging the importance of our marketing practices, we use the opportunity provided by various communications channels to not only present information related to Yettel's offers for customers but also raise awareness about important sustainability topics. Across all our operations, including retail and infrastructure, we prioritize data protection and privacy services for our customers.

Our responsibility extends beyond the point of sale. We strive to educate customers about proper usage and maintenance of electronic devices, operating our own repair center to help extend the lifespan of devices. We have prioritized responsible e-waste management, focusing on increasing recovery, reuse and recycling of end-of-life mobile phones and other electronic devices through different services (e.g., Recycle and Save, e-waste collection points in the store network, etc.) and awareness initiatives aimed at the general population such as the Yettel Recycler.

Interests and Views of Stakeholders

At Yettel, we acknowledge the critical role of stakeholder engagement in understanding our organization's broad impact on the economy, environment and society. We strive to recognize and address the diverse needs and expectations of our stakeholders through a process of identification, mapping and prioritization of different stakeholder groups. Although we already have well-established channels for information exchange and feedback that ensure stakeholder voices are heard and considered, we continue being open to introducing new ways in which we can communicate and gather helpful information. This approach not only helps us identify the most significant issues facing our company but also allows us to make improvements in areas that matter most to our stakeholders.

By maintaining open lines of communication and actively listening to stakeholders, we build trust and respect, which ultimately strengthen our long-term relationships. Through continuous engagement, we ensure our strategies are closely aligned with stakeholder expectations and that our decisions are informed and beneficial to both the company and the communities we support.

Engagement of Primary Stakeholder Groups

Stakeholder group	Mode of communication	Purpose of stakeholder engagement	Stakeholder expectations	Initiatives and responses
Employees	• Digital Office application - a company application where employees can read about news and important policies and participate in short surveys • Intranet SharePoint - storage for useful information and policies • Specific engagement portal for customer-facing employees • Monthly employee engagement surveys • Internal trainings and webinars • Internal initiatives run by Yettel	We strive to ensure that all our employees are aware of the changes in the organization, both in terms of sustainability governance and in respect to wider policy amendments. We make sure that they are informed about their employment details, including benefits and conditions. We also build employee morale by announcing Yettel's achievements and prizes. We engage employees on sustainability issues regularly, aiming to educate them on the topic, to create a strong community and obtain wider agreement about our measures. To that end, we give them the opportunity to share their ideas by participating in the ESG Crew or through specifically designed feedback forms. In addition, we engage with employees to understand the material topics of our enterprise. Employee engagement is regularly measured in our Monthly engagement surveys. Employees can openly and anonymously share their feedback and proposals for improvement which are reviewed by the responsible people and corrective/ improvement measures are taken. In addition to that, we follow a comprehensive employee engagement and well-being strategy that spans across various stages of the employee lifecycle - from the recruiting and onboarding stage, through retention and finally to transition and offboarding. Through all these phases we aim to gather feedback from our employees on their satisfaction, engagement, needs and expectations to meet these in the best possible way.	• Career security and development • Competitive compensation and benefits • Work-life balance • Respect and fair treatment • Health, safety and well-being in the workplace	• Uphold Yettel's Code of Conduct • Establish human resources policies and procedures in accordance with applicable laws and enforce through regular training • Promote good workplace behaviours, diversity, equity and inclusion among team members through policies and internal communication • Provide career path development and competitive salary and benefits • Develop and implement talent management programmes • Perform employee engagement surveys and performance assessments. Provide channels for employees to safely voice their concerns • Organize corporate social responsibility (CSR) activities to foster social responsibility and build relationships between employees

Stakeholder group	Mode of communication	Purpose of stakeholder engagement	Stakeholder expectations	Initiatives and responses
Relatives and other employees' family members	• Internal initiatives run by Yettel • Yettel Family Day • "Second Shift" career guidance program • Internal volunteering programs	We engage employees' family members – especially children, through various initiatives aiming to promote Yettel as an inclusive, hospitable employer with a supportive and welcoming corporate culture.	Initiatives that involve employees' children and family members help foster a supportive work environment, boosting employee satisfaction, engagement and their overall connection to the company	• The initiatives are mostly focused on educating children on the topics of sustainability, the world of technology and online safety, career guidance and others • Relatives and family members of all ages are also welcome to join a variety of Yettel Bulgaria's volunteering initiatives, organized throughout the year
Customers (incl. private customers and business customers)	• Our website and social media channels • Customer satisfaction surveys for mobile services customers • Feedback forms distributed through our application • Retail stores and call center	We aim to receive regular feedback from our clients, covering a variety of topics such as the quality of our services, their perception about our brand and how we rank against our competitors. We want to understand more about their attitudes toward our sustainability initiatives and their perception of our brand in regard to sustainability. We discuss ESG topics during our meetings with business clients, actively seeking their feedback and exploring opportunities for partnerships that can enhance our sustainability aspirations. We have an open grievance procedure available to our clients and we thoroughly review each complaint we receive.	• Product quality (e.g., design, function, convenience) • Service quality (e.g., 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, procedures and customer offers
Suppliers (incl. contractors)	Due diligence procedures	We engage our suppliers to ensure they comply with the applicable laws and adhere to the principles adopted in Yettel's Ethics and Compliance Policy and e& PPF Telecom Group Supplier Code of Conduct. We further engage on social and environmental issues, working together with them to assist in assessing the impact of their operations on various ESG topics and sharing best practices and know-how.	• Equal and fair supplier 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	• Surveys supporting the definition of relevant IROs for Yettel Bulgaria • Discussions on ESG topics	We always seek feedback from government and regulatory bodies when it comes to defining and confirming relevant IROs for Yettel Bulgaria. Additionally, to encourage the sharing of best practices on various ESG topics, Yettel proactively engages with regulators by discussing relevant issues and exchanging experiences and insights.	• 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 as applicable

Engagement of Secondary Stakeholder Groups

Stakeholder group	Mode of communication	Purpose of stakeholder engagement	Stakeholder expectations	Initiatives and responses
General population	• Brand tracker surveys • Research focusing on attitudes toward sustainable living	We center our brand around people, so we gather feedback on our products and services and research public attitudes in Bulgaria to better understand our audience. By identifying gaps in awareness and adoption of sustainable practices, we strive to provide solutions that empower individuals to make environmentally responsible choices, contributing to a greener future for Bulgaria.	• 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 business support locally • Encourage and support local community-related projects, partnerships, CSR programs and campaigns
Non-governmental organizations (NGOs)	• Partnerships • Internal and external events	We recognize NGOs as essential partners in driving positive environmental and social impact. Through regular dialogue and joint initiatives, we align on shared sustainability goals and co-develop projects that address key ESG challenges.	NGOs expect Yettel to continue participating in local initiatives and demonstrating social responsibility, upholding transparency and engaging in meaningful collaboration on shared societal and environmental goals.	Our volunteering programs offer Yettel Bulgaria's employees the opportunity to contribute directly to causes that matter, while open sessions facilitate knowledge sharing, fostering deeper collaboration and collective action toward a more sustainable Bulgaria
Media outlets	• Events • Press releases • Interviews • ESG reports and surveys	Transparency and accountability are key pillars of our Sustainability Strategy. Engaging media outlets serves several strategic purposes, including increasing public awareness of our initiatives, services and values and positioning the company as a leader in technology, innovation and sustainability. By responsible reporting on ESG topics, we contribute to raising awareness, inspiring action within the broader community and building trust among our stakeholders.	Media outlets typically have specific expectations centered around access, accuracy, timeliness and credibility of information	Through proactive communication with media outlets, we ensure that stakeholders have access to accurate and timely information about our sustainability commitments, progress and challenges

In our ongoing commitment to stakeholder engagement and sustainability, we have implemented several key initiatives over the past year:

ESG Connect on the Topic of Diversity, Equity and Inclusion (DEI)

In November 2023, we hosted our first ESG Connect business breakfast at our headquarters. This event brought together diverse companies and experts, creating a platform for sharing experiences and best practices in integrating sustainability principles into business operations.

Building on this success, we expanded our ESG Connect series in 2024. In June, we organized our second ESG Connect event, centered on the theme of "The Diversity that Connects Us." This event aligned with our 2024 key ESG focus: Diversity, Equity and Inclusion (DEI). We brought together our business clients and partners to exchange good practices in the field of DEI, fostering a collaborative environment for learning and growth.

B2B Customer Engagement

To better understand and address our B2B customers' needs, we've implemented regular surveys. These are complemented by our ESG Connect series, exploring crucial topics such as developing sustainability strategies, integrating ESG solutions into business operations and creating environments that support diversity, equity and inclusion.

Supplier Engagement Campaign

Throughout 2024, we took significant steps to enhance our sustainability efforts and stakeholder engagement. We launched our first supplier engagement campaign, actively driving the completion of self-assessment questionnaires by vendors and enforcing our Group-wide Supplier Code of Conduct. This initiative marks an important step in ensuring our supply chain aligns with the company's sustainability values.

Social Research on ESG Attitudes

We have also deepened our understanding of consumer attitudes towards sustainability through our annual sustainability social research. This comprehensive survey covers various topics, including attitudes towards e-waste recycling, awareness of mobile operator offerings related to recycling and general knowledge of ESG terms and other key sustainability topics.

Social Research Regarding Online Safety and Internet Use of Children and Their Parents

Recognizing the importance of digital safety, especially for younger generations, we conducted our **annual survey "The Digital Life of Children and Their Parents"**. This research, covering children aged 7-12, teenagers aged 13-19 and their parents, provides valuable insights into Internet usage, online threats and the digital skills development needs of both children and adults.

Stakeholder input plays a key role in keeping the company relevant and responsive. For example, feedback from B2B clients directly influenced the expansion of device return services, aligning with growing demand for circular solutions. At the same time, insights from digital literacy surveys revealed that children prefer to learn about online safety at home and in response, we broadened the educational outreach to better support and empower parents as digital mentors.

The Role of the Administrative, Management and Supervisory Bodies

Yettel Bulgaria's Executive Leadership Team (ELT) serves as the top governing body, holding the primary responsibility for directing the company's business strategy, making decisions and supervising the organization's impacts related to economic, environmental and social matters. The ELT consists of seven members, two women and five men, reflecting a gender diversity ratio of 0.28.

The ELT defines objectives, monitors progress, manages resources and distributes responsibilities to ensure the operational and financial targets set by e& PPF Telecom Group are met, while taking into account the commercial, financial and regulatory factors that affect Yettel's operations. Management also plays a crucial role in business conduct by establishing, promoting and maintaining high standards of social and environmental sustainability, as well as business ethics throughout the value chain, as evidenced by their commitment to the Supplier Code of Conduct and the Ethics and Compliance Policy.

The Executive Leadership Team's expertise in corporate governance is showcased through their extensive experience within the telecommunications industry in Bulgaria and the wider CEE region. They manage risks, promote ethical awareness and build a culture of integrity supported by training sessions on anti-corruption and informational sessions on bribery, ethics, privacy and security. The ELT's expertise in overseeing Yettel's sustainability impacts, risks and opportunities, is also backed up by training sessions in various ESG matters.

Yettel Bulgaria prioritizes responsible governance and sustainable development, with accountability spread across the organization. The oversight of sustainability-related impacts, risks and opportunities is the responsibility of the management team, including the CEO, Chief Corporate Affairs Officer (CCAO), ESG Manager, the Core Sustainability Team and Target Owners. The responsibilities of each of the teams and individuals, related to sustainability impacts, risks, opportunities and targets, are outlined in our Sustainability Policy, which we developed and implemented in 2025.

Jason King
Chief Executive Officer

Bogdan Uzelac
Chief Commercial Officer

Nikola Petreski
Chief Financial Officer

Hristo Tsvetkov
Chief Strategy Officer

Galina Chuleva
Chief Human Resources Officer

Spas Velinov
Chief Technology Officer

Michaela Kalaijieva
Chief Corporate Affairs Officer

Our management oversees sustainability aspects related to climate change, environment, circular economy, social issues, corporate governance and cybersecurity. To fulfil this responsibility, our Sustainability Strategy is under continuous monitoring in line with best practices and new insights with the aim of maintaining alignment with organizational direction – these actions were also embedded in our Sustainability Policy. Moreover, our management supervises sustainability-related risks, opportunities and impacts, policies, targets, action plans and dedicated resources through the ESG Manager, the Core Sustainability Team and our Target Owners.

We are committed to taking concrete steps to deliver on Yettel's Sustainability Strategy and ensure they align with our business model and goals, and the management team's knowledge and skills in handling the company's sustainability impacts contributes to that. The team's extensive knowledge on the topic of sustainability is based on numerous successfully completed learning opportunities. To date, two of our C-level executives have completed their studies at the ESG Academy, in collaboration with Sofia University. Our management team has also successfully completed a focused one-day ESG training session with PricewaterhouseCoopers (PwC), tailored to fit the specific needs and duties of the team members. Additionally, a session on unconscious bias was conducted for the senior management in 2023.

In 2024, we set out to build on this foundation by having our entire management team complete an extensive online training program focused on ESG topics. The program consisted of five modules and every member of the management team successfully finished the entire course.

> The successful completion of these training programs showcases the extensive expertise in the field of sustainability which our management team has acquired over the years. Their proficiency spans across various specialized areas and encompasses knowledge of key sustainability issues, such as climate change mitigation, circular economy principles, social responsibility practices, effective corporate governance and cybersecurity. The focus on these areas is strategically aligned with our organization's significant impacts, potential risks and emerging opportunities. This collective knowledge and experience enable the Executive Leadership Team to effectively guide and oversee the company's sustainability initiatives and strategies.

The CEO and other C-suite executives actively **engage in strategic sustainability matters and manage the organization's impacts** on the environment, the people and the economy, as well as the company's sustainability targets. They ensure transparency by maintaining consistent stakeholder engagement with different stakeholder groups. The management team holds regular meetings to address significant issues related to the company's potential and actual adverse effects on stakeholders and about the views and interests of stakeholders. Meanwhile, we continuously keep key stakeholders updated, striving for transparency and contributing towards our sustainability efforts.

Yettel Bulgaria's commitment to sustainability is built on a **robust framework of roles and responsibilities**, ensuring effective implementation and coordination of our Sustainability Strategy. The **ESG Manager** plays a pivotal role in this structure, serving not only as the coordinator of local ESG activities across the company but also participating actively in strategic ESG initiatives led by e& PPF Telecom Group. A key responsibility includes providing relevant ESG reporting data to the Group's ESG Manager, ensuring that local efforts align with the broader strategic vision.

To maintain accuracy and cohesiveness in our reporting, the ESG Manager is tasked with overseeing the entire organizational data collection process, conducting thorough reviews and signing off on the final datasets. This role ensures the accuracy and precision of sustainability data that is shared both internally and externally, bridging communication with e& PPF Telecom Group.

Working alongside the ESG Manager, the ESG Team, also known as the **Core Sustainability Team**, is instrumental in enhancing visibility of our sustainability progress. We have delegated the monitoring, management and oversight of our impacts, risks, opportunities and sustainability targets to the Core Sustainability Team. The oversight over this team is carried out through monthly updates provided to ESG Manager, the CxOs and the CEO. Reporting lines to our administrative, management and supervisory bodies are designed to ensure cross-departmental cohesion and supervision by **Target Owners** for respective departments.

The ESG Manager and the Core Sustainability Team play a crucial role in ensuring cohesion across departments and monitoring progress towards sustainability goals. They communicate directly with our ESG Target Owners in key departments. While the ESG Manager coordinates the overall sustainability agenda, the individual Target Owners are tasked with overseeing and executing specific goals of the Sustainability Strategy within their areas of expertise. Every target in the Sustainability Strategy is assigned to a Target Owner and has a sponsor from the CxO team. At present, Target Owners are positioned within the following departments: Logistics and Document Management, Finance, Facility and Fleet, Human Resources, Brand and Marketing Communication, Corporate Communications, Sourcing, Technology, as well as Commercial and Retail teams, each responsible for their department's objectives. The Legal Division provides supportive functions in this process. Monthly updates are communicated by the Target Owners to the Core Sustainability Team and the ESG Manager to ensure the consistency of efforts towards achieving our Sustainability Strategy targets.

CEO, e& PPF Telecom Group

Executive Director CEE & Chief Sustainability Officer, e&PPF Telecom Group

CEO, Yettel Bulgaria

Chief Corporate Affairs Officer

ESG Manager

Support Legal

Core Sustainability Team

Support Corporate Communications

Implementation Sustainability Strategy

Target Owners

Logistics and Document Management

Finance

Facility and Fleet

Human Resources

Brand and Marketing Communication

Corporate Communications

Sourcing

Technology

Commercial

Retail

We prioritize **sustainability education** not only for our management, but also **for everyone** else contributing to the efforts of achieving our Sustainability Strategy. Our comprehensive ESG Academy provides foundational training for our Core Sustainability Team members and Target Owners. Additional specialized, topic-specific trainings are offered internally or through external opportunities. We also provide upskilling programs to ensure our team stays informed about emerging ESG topics, building a knowledgeable and adaptable workforce ready to address sustainability challenges.

Crucial to our data integrity are the **ESG Data Owners** who uphold standards of accuracy and regulatory compliance. They ensure that the data inputs align with industry guidelines and reporting frameworks such as GRI and ESRS. By implementing rigorous data governance measures, including validation, audit trails and confidentiality safeguards, they guarantee the reliability of our ESG reporting. They also provide evidence of data accuracy and completeness through documentation like invoices and spreadsheets, reinforcing our commitment to transparency.

Impacts, Risks and Opportunities (IROs) are reviewed thoroughly by the CCAO and CFO and approved by the whole management team. When changes in the IROs occur, decision on how we would proceed with the given topic is also taken from the whole team.

Yettel's ESG Crew, a group of 20 dedicated volunteers from various departments across the company, also plays a vital role in **internal engagement on sustainability**. These employees, united by their passion for sustainability, work together to raise awareness about environmental, social and governance themes among their colleagues. The group organizes a variety of internal initiatives such as:

The primary goal of the ESG Crew is to engage fellow employees in sustainability initiatives, encouraging them to take steps towards a more sustainable lifestyle. By organizing activities and sharing information, they help bridge the gap between the company's sustainability goals and individual actions. This grassroots approach not only enhances internal communication about sustainability but also fosters a culture of environmental and social responsibility within Yettel. The ESG Crew's efforts contribute significantly to making sustainability a part of everyday conversations and decisions across the organization, regardless of an employee's role or department.

Yettel's **E-waste Collection Challenge** aimed at collecting electronic waste for recycling and raising awareness about the need for proper disposal of old electronic devices

Yettel Hanger which incentivizes employees to swap used clothes, shoes, accessories, books and hobby items and thus supports the circular economy principles

Recycling initiatives, incl. quizzes and information materials to educate employees about the proper way of recycling waste

Statement on Due Diligence

Sustainability Due Diligence (SDD) is a comprehensive process employed by our company to identify, prevent, mitigate and report on actual and potential negative impacts our activities may have on the environment and people. This practice extends to cover changes in the company's operational strategy, business model, activities and business relationships, including scenarios involving acquisitions or divestments. The cornerstone of SDD is a methodical approach to recognizing and quantifying negative impacts that stem from, or could potentially arise from, operations directly connected to the company's activities, products, services and business relationships throughout the entire value chain.

More information on our due diligence efforts and the way we govern them can be found in the following sections:

Risk Management and Internal Controls over Sustainability Reporting
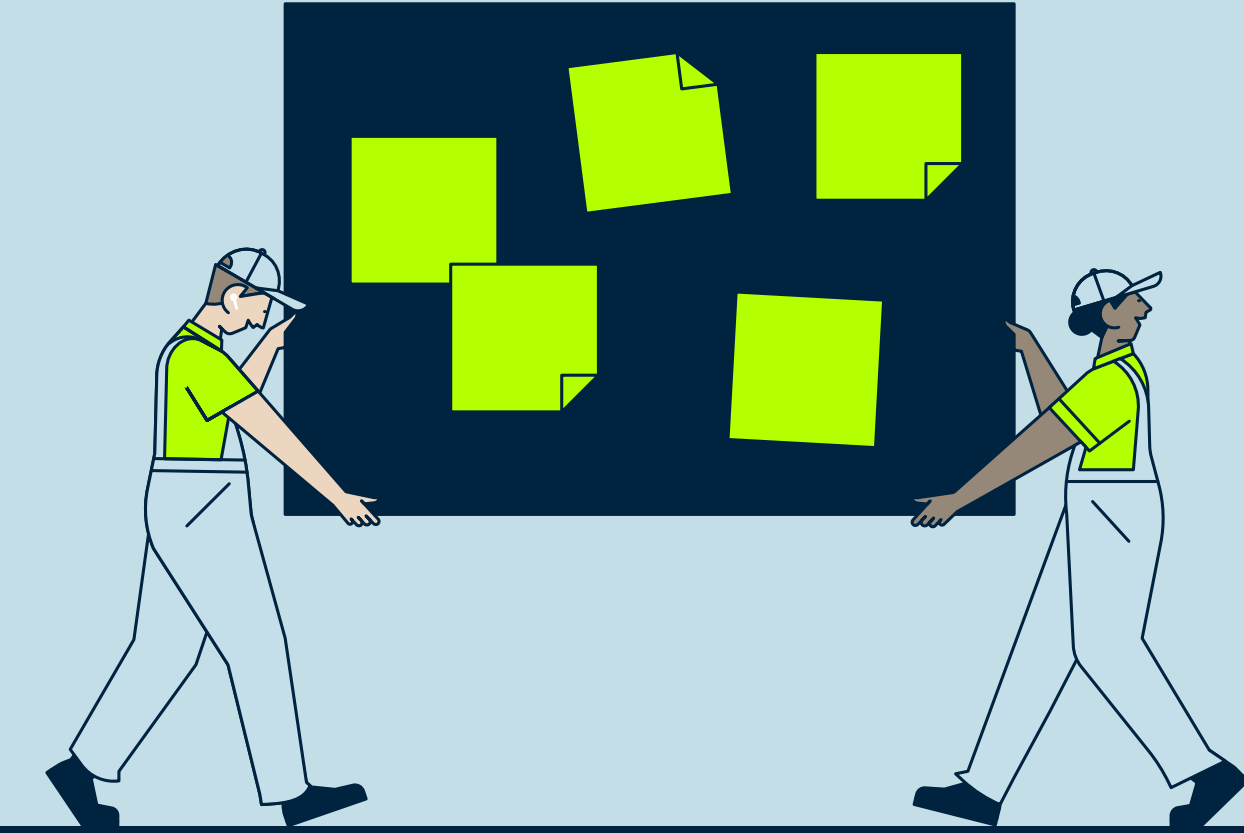
Risk Management Systems

Yettel has implemented comprehensive risk management procedures across all key operational areas to ensure business continuity and effective emergency responses. We continuously identify uncertainties and risks, evaluating the potential financial impacts and their likelihood. Significant risks are regularly monitored and preventive measures are applied to effectively limit their impact or likelihood, with management periodically reviewing the effectiveness of these measures.

To oversee risk management, Yettel Bulgaria has established a comprehensive **Risk Management Policy** that outlines the company's approach to Enterprise Risk Management (ERM). This policy is complemented by a detailed **climate-related risk analysis**, demonstrating the company's commitment to addressing both general and sustainability-related risks. The scope of the policy covers all levels of the organization, from individual employees to the CEO and shareholders. It emphasizes that risk management should be a practical tool for managers at all levels, with all employees responsible for managing risks within their areas of responsibility.

Our risk management system has a cross-functional and multi-disciplinary focus, recognizing that risks may cut across business activities or organizational boundaries. It is designed to be an integral part of decision-making processes, including strategy formulation, performance management, investment processes, mergers and acquisitions and major projects.

The main features of our risk management control process include risk identification, assessment and response. We use a risk matrix to define impact categories and measure risks relative to both financial and non-financial categories. This matrix includes scales for likelihood and impact, covering areas such as regulatory impact, brand/reputation and Health, Safety and Environment (HSE).

Our Risk Management Policy also outlines **roles and responsibilities for risk management**. Our CEO is the approver of the policy, while the CFO is the policy owner. The CEO plays a crucial role in risk response, particularly for significant threats. They are responsible for implementing actions to bring company threats to an acceptable risk level and for escalating risk response decisions to Yettel's shareholders. On the other hand, the policy owner's responsibilities include oversight of the risk management processes in the company with an aim to ensure that risks are identified, assessed and treated in a timely manner. There is also a designated Risk Manager (also our policy manager), who is responsible for providing support and guidance to the company with regards to risk management. Line managers are responsible for embedding risk management in day-to-day business processes.

Our CEO and Executive Leadership Team (ELT) **review** strategic risks and discuss risk matters at least once per quarter, deciding on appropriate actions based on inputs from middle management, the Risk Manager and subject matter experts. The CEO reports the strategic risk picture to the shareholders on a quarterly basis, ensuring regular communication of significant risks and mitigation strategies. Additionally, when significant threats to the company are identified, these are reported to the CEO without undue delay, with the shareholders being notified of such risks and responses, facilitating timely escalation of critical risk information to the highest levels of management and oversight.

Sustainability related risks and mitigation strategies

Specific information on how we aim to mitigate the negative effects related to our impacts and risks can be found in the following sections:

"Climate Change", sub-section **"Climate Transition Plan and Risk Analysis",** page 27

"Safeguarding Personal Data", sub-sections **"Policies",** page 63 and **"Actions",** page 64

"Cybersecurity", sub-sections **"Policies"** and **"Actions"** page 67

Climate risk analysis

Complete information on our climate risk analysis can be found in section

"Climate Change", sub-section **"Climate Transition Plan and Risk Analysis"**, page 27
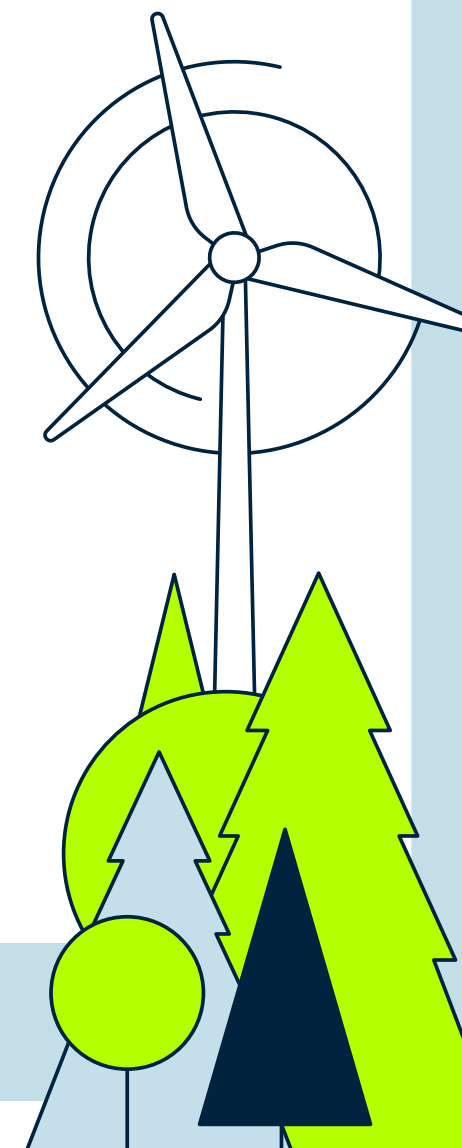
Risks related to sustainability reporting

We acknowledge the risks associated with incomplete or inconsistent sustainability reporting, including risks of greenwashing. Additionally, there are risks related to the accuracy of data inputs and manual errors during the aggregation of data from multiple systems into the corporate disclosure management system. To mitigate these risks, in 2025, we established comprehensive controls over our sustainability reporting process, which we plan to continue strengthening. This includes implementing review controls for both quantitative and qualitative data in the sustainability statements by business areas and company functions.

Material Impacts, Risks and Opportunities

Description of Yettel's process to identify and assess material impacts, risks and opportunities

In 2024, Yettel initiated steps to align its materiality assessment with the ESRS, aiming to classify impacts, risks and opportunities according to ESRS topics, sub-topics and sub-sub-topics. We updated our **materiality assessment** of sustainability issues in line with GRI 2021 guidelines and the final version of the ESRS. However, Yettel acknowledges that some specific risks and opportunities for 2024 require further analysis and the 2024 materiality assessment should be considered a pilot version inspired by ESRS. It is anticipated that as we refine our analysis, additional material impacts, risks and opportunities may be identified and reported.

Yettel's approach began with an **impact assessment** (inside-out) to evaluate environmental and societal impacts, building on previous assessments across operations and value chain. We also conducted a high-level **financial assessment** (outside-in) to identify sustainability-related business risks. Where possible, Yettel quantified these impacts and risks, supplementing with qualitative assessments.

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

| 1. Context Analysis	2. Identification of Topics, Sub-topics, and Impacts, Risks and Opportunities (IROs)	3. Assessment of Potentially Material IROs	4. Determination of Material Sustainability Matters	5. Oversight and Validation of Materiality
We began by examining internal and external sustainability factors, considering our business model, value chain and stakeholders. This involved reviewing relevant internal documents and engaging with key stakeholders from critical business areas.	Building on the contextual analysis and insights from previous assessments, we compiled a preliminary list of potentially material topics and sub-topics. For impact materiality, we identified associated potential and actual, positive and negative impacts on people or the environment through our own operations, as well as the upstream and downstream value chain, considering factors such as the company's business model, operations, industry landscape, business relationships, geographic presence and stakeholders. For financial materiality, we identified risks and opportunities derived from dependencies on natural and social resources throughout the value chain, that may potentially trigger financial effects. All sub and sub-sub-topics, as presented in ESRS 2 AR 16, as well as potential additional entity specific topics were taken into account when considering Yettel's IROs.	We evaluated the identified IROs from both impact and financial perspectives. To manage the extensive ESRS assessment requirements, we streamlined the process by engaging internal and external subject matter experts and leveraging feedback from customers, employees and other partners. In evaluating the materiality of identified negative impacts, both potential and actual, we employed a comprehensive scoring system. This system considered three key factors: scale, scope and irremediability, each rated on a scale of 1 to 5. The combined scores of these factors determined the overall severity. In the case of potential impacts, we assessed materiality by considering both their likelihood and severity. When it came to risks and opportunities, we used a similar approach. Each identified risk or opportunity was rated on a scale of 1 to 5 for both its likelihood of occurrence and the potential magnitude of its financial effects. This assessment followed the matrix provided by EFRAG, which ensured a standardized evaluation process for existing and future impacts, risks and opportunities.	Each IRO was evaluated against pre-defined materiality thresholds, including a GRI-based threshold for impact materiality. IROs surpassing these thresholds were categorized as material. We anticipate that we will have to adjust these thresholds when a more thorough materiality assessment is conducted.	As a last step, Yettel conducted a validation of all findings with various experts, managers and involved parties on a local level. The results were then reviewed and endorsed by Yettel's senior management to ensure alignment with the company's strategy and priorities.
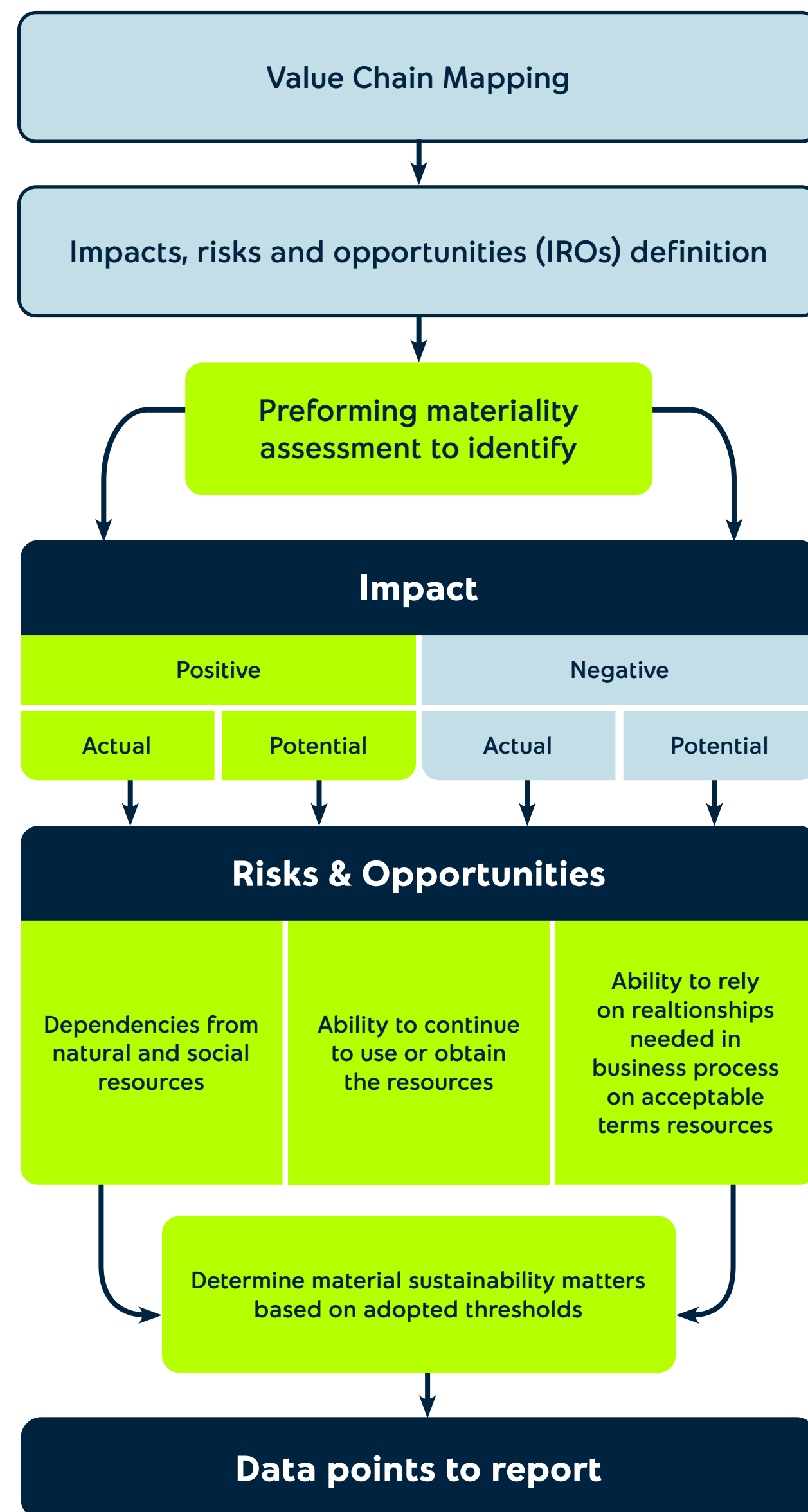
Material Impacts, Risks and Opportunities and Their Alignment With Yettel's Strategy and Business Model

Yettel has conducted comprehensive assessments to identify its significant environmental and societal impacts (impact materiality assessment) and to evaluate sustainability-related risks and opportunities affecting the business (financial materiality assessment).

The results of these assessments were consolidated in accordance with the ESRS. This process highlighted several key areas as Yettel's most material sustainability issues, which are as follows:

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

For a more detailed understanding of how these material impacts, risks and opportunities align with Yettel's strategic objectives and business operations, as well as for detailed information on the resilience of Yettel's strategy relevant to each IRO, please refer to the sections **"Business Model, Strategy and Value Chain"** and **"Climate Transition Plan and Risk Analysis"**.

Yettel Bulgaria creates its 5-year Strategic Plan through a collaborative process involving all company functions. The plan considers stakeholder needs and market developments that could affect the company's strategic goals. As part of this planning, we identify key strategic risks and develop mitigation strategies, which are reviewed with stakeholders and approved by the Group. Since ESG goals are built into our overall strategy, we also create risk mitigation plans for these areas. Once the strategic plan is finalized, the ELT regularly reviews and updates the key risks and mitigation strategies during implementation - at least once every quarter.

Full list of our material sustainability impacts, risks and opportunities, identified through our double materiality assessment process, can be found in **Appendix B** of this report (page 82). All material IROs presented in the table were addressed by the highest governance body during the reporting period.

Information on the expected effects that Yettel will experience as a result of the identified material risks and impacts can be found in section **"Climate Change"**, sub-section **"Climate Transition Plan and Risk Analysis"** (page 27).

Flowchart (left sidebar)

- Value Chain Mapping
- Impacts, risks and opportunities (IROs) definition
- Preforming materiality assessment to identify
- **Impact**
  - Positive
    - Actual
    - Potential
  - Negative
    - Actual
    - Potential
- **Risks & Opportunities**
  - Dependencies from natural and social resources
  - Ability to continue to use or obtain the resources
  - Ability to rely on realtionships needed in business process on acceptable terms resources
- Determine material sustainability matters based on adopted thresholds
- **Data points to report**

Reducing Our Environmental Footprint

Climate Change

We are aware of the significance of climate change as a global challenge and we are committed to doing our part by finding new ways to reduce our environmental impact across our operations and value chain.

Our climate-related impacts, while varied, are inherent to our industry. We know that our services, especially data transmission and storage, use a lot of energy. This presents us with both challenges and opportunities to adopt sustainable practices and lead by example in our sector.

We have pinpointed several areas of our operations that are linked to climate impacts:

The consumption of **purchased electricity and heat** to power our networks and technology centers results in indirect greenhouse gas emissions.

The production of **electronic devices** we sell to customers (e.g., mobile phones and tablets), as well as our **network infrastructure equipment**, involves consumption of energy during the manufacturing, extraction, processing and transportation stages.

Additionally, the use and end-of-life treatment of the products we sell contributes to overall climate impact.

Given these challenges, we need to look for smarter ways to use energy. For example, we are excited about our energy-efficient 5G solutions, which have the potential to reduce carbon footprint across our entire value chain.

We are aware of the climate-related transition risks we face, especially in our upstream value chain. These include potential challenges to meet emissions targets or keep up with changing regulations, which could lead to fines or legal issues. We're also keeping an eye on energy prices and availability, and how carbon taxes might affect operation costs. Additionally, through our Climate Risk Analysis, we have identified several climate-related physical risks that could impact our operations. The main **physical risks** we have pinpointed are **droughts**, **floods** and **high temperatures**, which could potentially affect our infrastructure and service delivery.

These impacts, risks and opportunities have shaped our corporate strategy and business practices, and this is reflected in the way we implement our Sustainability Strategy 2028. We extend our commitment to addressing climate change to our employees and stakeholders through campaigns that raise awareness and encourage support for our environmental efforts. For us, addressing environmental concerns isn't just about being responsible - it's a key part of our business strategy. We are committed to being transparent in our reporting and always improving our environmental performance. As standards for sustainability continue to rise, we are aiming to meet and exceed them.
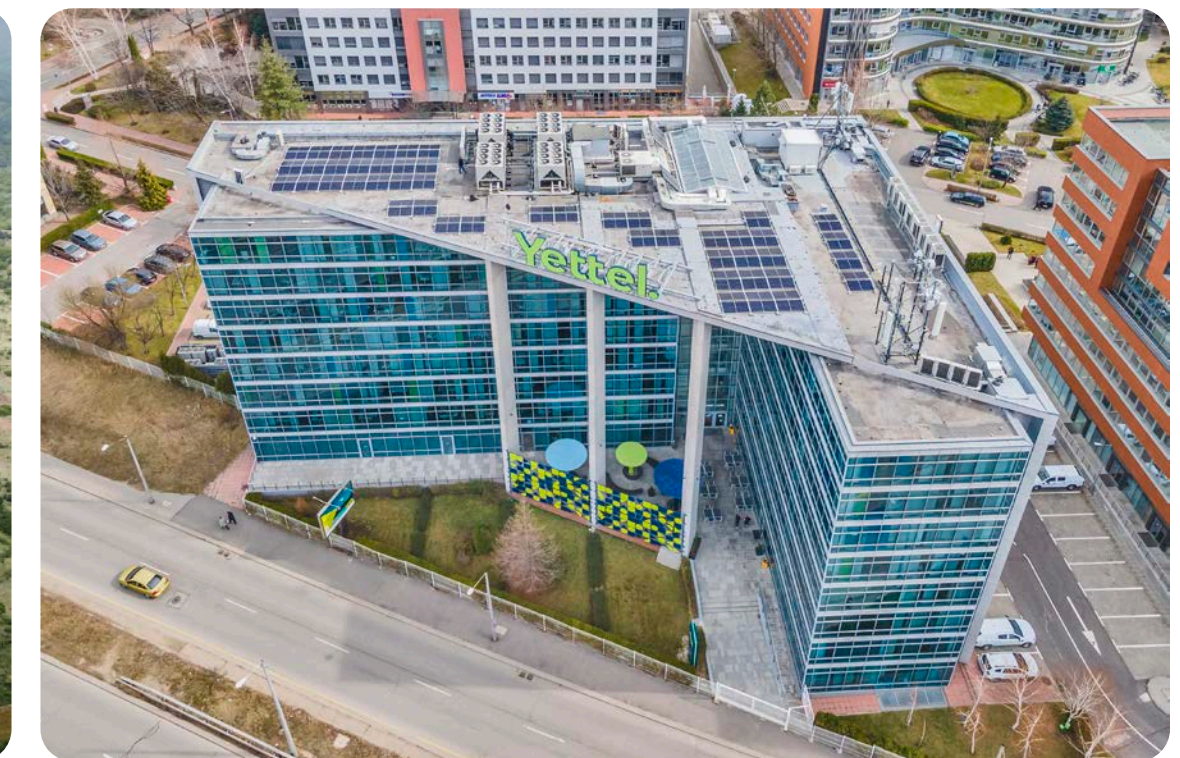
Policies

In response to the impacts and challenges that we face related to the topic of climate change, we have developed and implemented a comprehensive set of policies and initiatives. At the center of these efforts is our **Environmental and Energy Management Policy**. This policy emphasizes our dedication to assessing environmental impact and energy performance, setting specific and measurable targets and continuously improving our performance in these areas.

We are committed to reducing our environmental footprint, both in our own operations and throughout our value chain. We do this by improving our energy efficiency and reducing our energy consumption. We prioritize the purchase of energy-efficient products and services and support innovative design activities that boost energy efficiency. We also believe in empowering our employees and encouraging them to adopt more environmentally friendly lifestyles. Through these efforts, we contribute to both national and international goals for environmental protection and carbon footprint reduction.

To successfully manage the topics of climate change and energy consumption and achieve our goals, we have adopted the international standard **ISO 14001**. This framework helps us evaluate the success of our approaches, identify areas for improvement and hold ourselves accountable. Furthermore, in 2024, we took our commitment a step further by certifying our operations for **ISO 50001**. This certification specifically focuses on improving energy performance, efficiency and consumption, allowing us to optimize our energy use and reduce costs while minimizing our environmental impact.

Central to our climate change efforts is our new **Sustainability Policy**, which we developed and implemented in 2025. This policy aligns with several international standards and frameworks, including the United Nations' Sustainable Development Goals (SDGs), the Paris Agreement on Climate Change and the Task Force on Climate-related Financial Disclosures (TCFD). This policy works hand in hand with our Sustainability Strategy, which consists of four main pillars, one of which is specifically focused on the environment. Our Sustainability Policy also emphasizes the role of technology in addressing climate change and environmental challenges, as we recognize its transformative power.

Additionally, in 2025, we developed and implemented our **Climate Change Policy**, further solidifying our commitment to environmental stewardship. This policy aims to support the achievement of e& PPF Telecom Group's approved Science Based Targets Initiative (SBTi) targets for Scope 1, 2 and 3 emissions. It also focuses on strengthening our resilience to climate-related risks by integrating adaptation measures into our business planning and decision-making processes. The policy affirms our dedication to aligning our business

practices with the objectives of the Paris Agreement and enhancing transparency in our operations. It applies to all aspects of our organizational operations, including our products, services and value chain processes.

Both policies show our commitment to transparency and continuous improvement in environmental and energy management. We commit to regularly review and update our policies, set measurable targets and report on our progress through annual sustainability reports, which are prepared in accordance with regulatory standards and requirements, including the Greenhouse Gas Protocol for Scope 1, 2 and 3 emissions calculation and reporting. Our Climate Change Policy, in particular, adheres to multiple international standards including the CSRD and the supplementary ESRS, further enhancing our alignment with global best practices in sustainability reporting.

Climate Transition Plan and Risk Analysis

Transition Plan

At Yettel, we are committed to aligning our environmental efforts with global best practices. While we haven't yet formalized a specific Climate Transition Plan, we are proud that our parent Group has already secured approval for its Science-Based Targets initiative (SBTi) goals. We are excited to share that we will be developing and approving a detailed **Climate Transition Plan** in 2025, coupled with a climate change mitigation strategy, which will complement the Group-wide objectives. For more information on our SBTi targets, see section **"Climate Change"**, sub-section "Actions & Targets" (pages 29).

Climate Risk Analysis

We have conducted a comprehensive climate risk analysis on our own operations, which provides valuable insights into our company's expected exposure to climate-related risks. This analysis was based on a **Regional Climate Model (RCM) data**, as well as other local, regional and global data, which allowed for a precise assessment of the risks at each individual geographical location of Yettel's assets (e.g., individual stores, offices, warehouses, etc.) It covers a wide range of chronic and acute climate-related hazards in line with the ESRS and EU Taxonomy. The analysis considers various timeframes, with **projections for 2030 and 2050** under different climate scenarios. Specifically, we have modelled three **Representative Concentration Pathways (RCP) climate scenarios** - RCP2.6-SSP126 (Optimistic scenario), RCP4.5-SSP245 (Pessimistic scenario) and RCP8.5-SSP585 (No breakout scenario) in the short, medium (2030) and long-term (2050) time horizons. The climate risk assessment evaluates exposure, vulnerability and transition risks for the company's asset portfolio.

The climate risk analysis considered a wide range of factors, including:

Exposure

Asset name, type, relationship and GPS coordinates

Vulnerability

Surface area, material of construction, building age and lifetime, foundation type, energy consumption, seismic design level, asset value and content replacement value

Transition risks

Scope 1 and 2 emissions, annual revenue, number of employees, business inventory, power backup provisions and EU Taxonomy alignment

This detailed approach allowed us to identify and prioritize climate-related risks across our asset portfolio. We evaluated 10 major climate risk hazards-further broken down into 51 partial and 81 climate risk indicators - for medium-term (2025–2030) and long-term (2030–2050) time horizons. The time horizons used during the assessment are linked to expected technical and moral lifetime of its assets, strategic planning horizons and capital allocation plans.

The analysis of transition risks and opportunities is based on qualitative analysis of transition events within the **TCFD framework**:

| Policy and Legal | Technology | Market | Reputation |

Transition climate risks and opportunities were identified through literature review and engagement of internal and external subject matter experts. These risks and opportunities were then ranked based on their potential impact on the company using a consequence/likelihood scale.

To evaluate the potential effects of key transition risks and opportunities, we utilized two distinct scenarios. The first is the **International Energy Agency's Net Zero Emissions by 2050**, which aligns with efforts to limit global warming to 1.5°C. The second is the **Stated Policy Scenario**, offering a more cautious outlook. We examined these scenarios across three timeframes: near-term (1 year),, mid-term (up to 5 years) and long-term (by 2050). This approach allows us to consider both ambitious climate action and more moderate policy implementation, providing a comprehensive view of potential future outcomes.

Yettel's climate risk assessment has identified several key physical and transition risks that could impact the company's operations and assets. The analysis considers various climate hazards and their potential effects on the company's infrastructure and business continuity.

Physical Risks

Droughts and Heat Stress

The assessment indicates an increased exposure to drought conditions, particularly in future scenarios. This could potentially affect cooling systems for network equipment and data centers, impacting operational efficiency and increasing energy costs. The analysis reveals that heat stress is the costliest hazard.

Extreme Temperatures

Rising temperatures may lead to increased cooling demands for network infrastructure and facilities, potentially straining energy resources and increasing operational costs. The analysis shows that cooling requirements are expected to generate considerable costs in 2030 - and 2050 - time horizons.

Flooding

Some assets may be at risk of flooding, which could damage equipment and disrupt services. The analysis also projects fluvial flooding costs in both 2030- and 2050-time horizons.

Transition Risks

Regulatory Changes

Potential introduction of stricter emissions regulations or carbon pricing mechanisms could increase operational costs.

Technology Shifts

The need to invest in low-carbon technologies to reduce emissions and meet potential regulatory requirements.

Market Changes

Shifting customer preferences towards more sustainable products and services could impact demand.

The climate risk analysis also identified the most vulnerable assets, currently these being our headquarters and warehouse in Sofia.

We have integrated the results of the climate risk analysis, as well as all other risks identified during our materiality assessment process, into our overall risk management control system, ensuring that climate-related risks are considered alongside other business risks in decision-making processes. Regular monitoring and reporting mechanisms have been established to track the effectiveness of these mitigation strategies and to allow for timely adjustments as needed.

While the general Risk Management Policy provides a solid framework, the addition of the climate risk analysis significantly enhances Yettel's risk management capabilities. It offers specific insights into climate-related risks, their potential impacts on the company's assets and how these risks may evolve over time. This integrated approach demonstrates Yettel's commitment to a structured and forward-looking approach to identifying, assessing and managing risks across the organization, with a particular focus on climate-related challenges.

Actions & Targets

Our commitment to addressing climate change, reducing emissions and improving energy efficiency across our operations is reflected in our ambitious initiatives, which have seen significant progress in 2024.

A major milestone was achieved this year with the approval of the Science Based Targets initiative (SBTi) goals for the e& PPF Telecom Group. **The Group has set the following targets:**

> Reduce **Scope 1 and 2** emissions by **43%** by 2030, compared to 2022 levels

> Reduce **Scope 3** emissions* by **25%** by 2030, compared to 2022 levels

These targets guide us in our commitment to meaningful climate action and align with global efforts to limit temperature rise to 1.5°C above pre-industrial levels. In alignment with the Paris Agreement's Net Zero target, we have also adopted the following target:

> Achieve carbon neutrality by 2050 or sooner by reducing our carbon emissions in **Scope 1, 2 and 3**, and our emission intensity.

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

Additionally, we are committed to defining specific targets for all Business Units, part of the e& PPF Telecom Group by 2025. This process will further refine our approach to sustainability and ensure that each part of our organization contributes effectively to our overall climate goals.

To support these goals, we have been actively involved in mapping our greenhouse gas (GHG) emissions inventory since 2022. This ongoing process enhances our ability to measure and track energy consumption and emissions across all operations, providing valuable data to inform our decarbonization strategies. Our dedication to transparency in climate-related matters is further demonstrated by e& PPF Telecom Group's participation in the **CDP (Carbon Disclosure Project)**, where we have received "**A-**" **rating in 2024**. This shows our considerable development compared to 2023, when the Group received the commendable "B" rating. This progress is particularly attributed to the implementation of our Power Purchase Agreement (PPA).

One of our most impactful initiatives has been the implementation of a **Power Purchase Agreement (PPA) with Electrohold Trade**. Signed in 2023 by **Yettel and CETIN Bulgaria**, this 10-year agreement ensures the supply of electricity from renewable sources. In 2024, we completed our first full year under the PPA, resulting in a remarkable 60% reduction in our Scope 1 and 2 emissions and contributing to our Group's emission reduction efforts.

Complementing our PPA, we continue to generate **on-site renewable electricity** through the photovoltaic plant on the rooftop of Yettel's headquarters. In 2024, the installation managed to produce **40.554 MWh of green energy**. This has allowed us to increase our overall renewable energy consumption shares and subsequently reduce our emissions across our operations.

Our efforts extend beyond energy sourcing to encompass comprehensive energy efficiency programs. In close collaboration with CETIN Bulgaria, we are continuously optimizing our **network's energy efficiency**. This involves a range of initiatives, including:

1. Network equipment modernization

We are consistently upgrading and replacing network equipment to increase efficiency across our sites.

2. 5G infrastructure expansion

While 5G deployment may initially increase energy demand, these upgrades are expected to deliver greater energy efficiency in data transmission over time.

3. Software and automation

We're leveraging advanced technologies such as server virtualization and remote management applications to minimize power consumption.

These network optimization efforts have resulted in a **continual improvement in our power-to-traffic ratio**, enabling us to handle increasing data traffic while maintaining stable power consumption levels.

Power to traffic ratio

● Traffic (PB) ○ Power (GWh) ● Power/Traffic (GWh/PB)
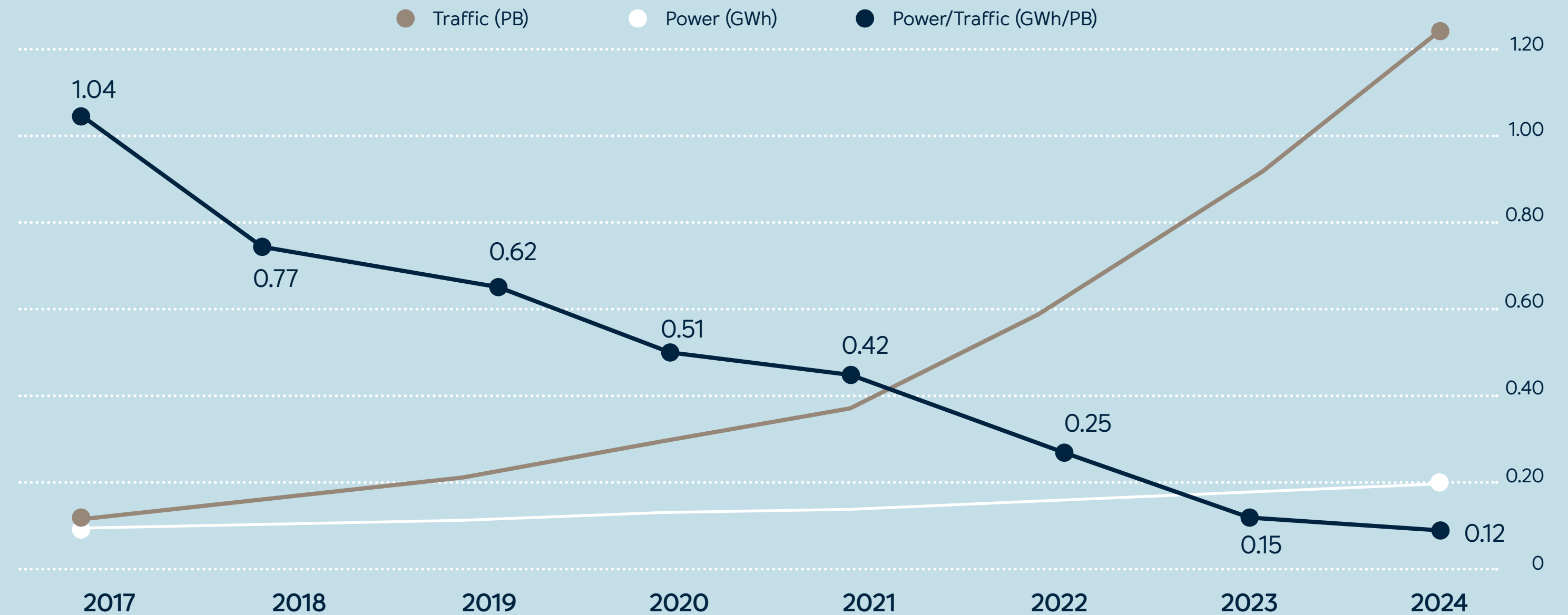
In our facilities, we maintain our commitment to energy efficiency through a range of comprehensive measures. We have introduced **LED lighting** across our stores, offices, warehouse, repair centre and headquarters. At Yettel's headquarters, we have installed a **Building Management System (BMS)** featuring smart controllers that allows for better control and monitoring of energy consumption. Besides that, we have installed an **energy-efficient cooling and heating system**. To further optimize our energy consumption, we **replaced chillers and refrigerants** in our central facility and installed more efficient air conditioning units.

Recognizing that our environmental impact extends beyond our direct operations, we actively participate in e& PPF Telecom Group's comprehensive supply chain engagement plan. This initiative is crucial for addressing Scope 3 emissions

and achieving our newly approved SBTi target of a 25% reduction by 2030. The plan will focus on collecting data on the carbon footprint of purchased products, integrating CO2 emissions into procurement criteria and adapting our product portfolio based on carbon intensity.

All proposed investments concerning climate change-related actions and efforts requiring sufficient resource allocation are reviewed by the relevant committee, depending on the nature and cost of the future investment. When evaluating investment proposals, the committee considers not only monetary value, but also savings related to GHG emissions and other sustainability factors.

Energy and GHG Emissions Metrics

In 2024, Yettel continued to build upon the solid foundation established in the previous years for calculating our greenhouse gas (GHG) emissions. We adhered to methodology, which aligns with the stringent requirements of the GHG Protocol standards, to accurately measure our emissions across Scopes 1, 2 and 3. This year, in collaboration with our parent company, e& PPF Telecom Group, we implemented several refinements to our GHG emissions calculation methodology, further enhancing the precision and comprehensiveness of our reporting. From 2024, **for certain categories** - such as purchased goods, capital goods, upstream transport, product use and end-of-life emissions - we rely, where possible, on **actual product emissions declared by manufacturers**. This enables greater alignment with the GHG Protocol, particularly for Scope 3 emissions. Where supplier-specific data is unavailable, we continue to apply a spend-based method using the most recent Exiobase emission factors specific to each country.

To ensure consistency and comparability of the 2024 GHG inventory with previous years— and in light of the changes and improvements described above, we have recalculated and restated the 2022 emissions data, in accordance with GHG Protocol requirements, in this sustainability report.
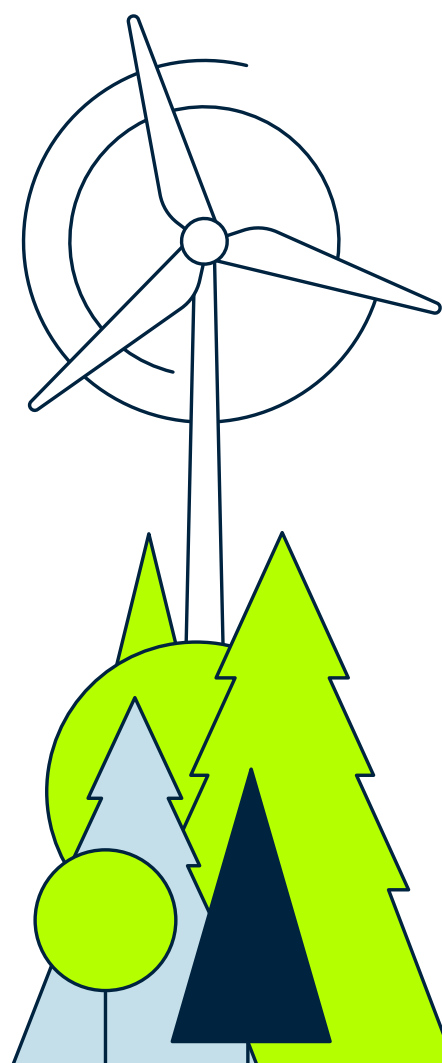
Our energy consumption

	2024
Fuel consumption from coal and coal products (MWh)	0.00
Fuel consumption from crude oil and petroleum products (MWh)	3,971.62
Fuel consumption from natural gas (MWh)	139.62
Fuel consumption from other fossil sources (MWh)	0.00
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	500.14
Total fossil energy consumption (MWh)	4,611.38
Share of fossil sources in total energy consumption (%)	49.51%
Consumption from nuclear sources (MWh)	488.69
Share of consumption from nuclear sources in total energy consumption (%)	5.25%
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	0.00
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	4,172.58
The consumption of self-generated non-fuel renewable energy (MWh)	40.55
Total renewable and low carbon energy consumption (MWh)	4,213.13
Share of renewable and low carbon sources in total energy consumption (%)	45.24%
Total energy consumption (MWh)	9,313.20

Energy intensity per net revenue

2023	2024	% Difference between 2023 and 2024
0.01851 MWh/1,000 EUR revenue	0.01744 MWh/1,000 EUR revenue	**5.76%**

The following table presents Yettel's total GHG emissions in 2024, disaggregated by Scopes 1 and 2 and significant Scope 3:

	Base Year (2022)	2023	2024	% Difference between 2024 and Base year
Scope 1 GHG Emissions				
Gross Scope 1 GHG emissions (tCO2eq)	1,002	956	966	-3.5%
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0%	0%	0%	n/a
Scope 2 GHG Emissions				
Gross location-based Scope 2 GHG emissions (tCO2eq)	2,380	1,707	1,750	-26%
Gross market-based Scope 2 GHG emissions (tCO2eq)	2,500	1,566	458	-82%
Significant Scope 3 GHG Emissions				
Purchased goods and services, excluding CETIN BG	54,805	38,165	42,355	-23%
CETIN BG emissions allocated to Yettel's Scope 3 (as purchased services)	81,598	54,799	28,368	-65%
Capital goods	9,194	19,778	7,189	-22%
Fuel and energy-related activities	1,246	876	444	-64%
Waste generated in operations	99	83	12	-88%
Business traveling	22	85	78	255%
Employee commuting	1,191	1,233	1,263	6%
Upstream transportation and distribution	777	908	386	-50%
Upstream leased assets	n/a	n/a	6	n/a
Use of sold products	3,038	1,897	2,864	-6%
End-of-life treatment of sold products	12	22	35	192%
Downstream leased assets	889	726	1,880	111%
Total Gross indirect (Scope 3) GHG emissions (tCO2eq)	152,871	118,572	84,880	-44%
Total GHG Emissions				
Total GHG emissions (location-based) (tCO2eq)	156,253	121,235	87,596	-44%
Total GHG emissions (market-based) (tCO2eq)	156,373	121,094	86,304	-45%

ⓘ Please note that we do not report Scope 3 GHG emissions for Downstream transportation, Processing of sold products, Investments or Franchises, as per the ESRS requirements, as these categories are not applicable to our business model.

The following table presents our GHG emissions intensity in total GHG emissions per net revenue and in metric tonnes of CO2eq.

	2023	2024	% Difference between 2023 and 2024
GHG intensity per net revenue (location-based) (tCO2eq/1,000 EUR revenue)	0.2413	0.1641	- 32.01%
GHG intensity per net revenue (market-based) (tCO2eq/1,000 EUR revenue)	0.2410	0.1616	- 32.94%

Greenhouse gasses and other air polluting emissions

Our **Scope 1** emissions encompass direct emissions within our control, including:

- Fuel consumption by company-owned or leased vehicles
- Fuel used for generators in remote areas or for backup power
- Natural gas and other heating fuels used in our premises
- Fugitive emissions from refrigerants or fire suppressants in our facilities

Scope 2 emissions cover the indirect emissions from purchased electricity and heat used to power our various operational sites, including offices, retail stores, commercial warehouse and repair center.

Our **Scope 3** emissions, while not under our direct control, represent areas where we can exert influence to reduce our overall environmental impact. These include:

- Emissions from our supply chain
- Emissions associated with network leasing
- Emissions resulting from the use of our products and services by customers

It is important to note that our Scope 3 emissions data is derived from a combination of sources. For purchased goods and services, as well as downstream leased assets, we utilize a mix of estimates, publicly available databases and data provided directly by our suppliers.

Resource Use and Circular Economy

Responsible use of resources and the topic of circular economy is central to our business. As a telecommunications company, we recognize our crucial role in addressing these issues. We are committed to tackling the environmental challenges inherent in our industry while seizing opportunities to create positive change.

Our approach to resource use and circular economy encompasses both the challenges we face and our dedication to exploring innovative solutions. We're focusing on key areas where we can make a significant difference, from reducing resource depletion to managing e-waste effectively.

During our materiality assessment, we have identified several key impacts in our own operations and upstream and downstream of our value chain:

Resource depletion and primary raw material use: We acknowledge that the production of new devices and equipment contributes to resource scarcity. The extraction and processing of primary raw materials for products we provide to customers have significant upstream impacts, depleting finite resources and potentially harming ecosystems. As a telecommunications company, our primary inflow resources include network infrastructure components, consumer electronics (such as smartphones and tablets) and various metals and plastics used in the manufacturing of these products and in the provision of our services. While we don't directly purchase metals used in mobile phones and electronics, we recognize our responsibility in the supply chain. We aim to align our efforts with regulations like the EU Conflict Minerals Regulation, striving to ensure that our products don't contribute to conflict or human rights abuses.

E-waste and hazardous waste management: The generation of e-waste and hazardous waste is a major downstream concern in our industry. We understand that improper disposal of electronic devices can lead to severe environmental consequences. It's important to note that the main type of waste generated by Yettel is electronic waste, which is composed of various materials including metals, plastic parts, glass and potentially hazardous components.

Microplastics pollution: Improper disposal and recycling of e-waste contribute to microplastics pollution, posing risks to both terrestrial and aquatic ecosystems. This downstream impact extends beyond our immediate operations, affecting broader environmental systems.

Packaging waste: The waste created by packaging materials, including pallets, is an ongoing issue both upstream and downstream in our value chain. This contributes to overall waste generation and resource consumption.

Accessory waste: Accessories sold with our products, such as phone cases, contribute to downstream waste generation, adding to the overall environmental impact of our product lifecycle.

These impacts constantly keep shaping the way we do business at Yettel. We understand that these challenges are all connected – this is why we keep reimagining our business strategy to align with circular economy principles. This shift isn't just about mitigating negative impacts, it's about creating value through responsible resource management and innovative waste reduction strategies. As we move forward, these impacts guide the way we develop and implement our policies.

Policies

Our commitment to environmental sustainability and responsible resource management is further extended by the development and implementation of multiple policies in 2025. The first is our new **Sustainability Policy**, which sets out our commitment to driving our 2028 Sustainability Strategy - with one of its key pillars focused on the environment. In that context, the policy addresses, amongst other topics, the responsible management of resource inputs and waste. The CEO, supported by the policy owner – the CCAO, together with the ESG Manager lead the policy's implementation and the company's ESG commitments.

Our second new policy, the **Sustainable Sourcing Policy**, also developed and implemented in 2025, integrates ESG criteria into our supplier selection process, extending our sustainability commitment along our supply chain. The Procurement Department will drive this policy, collaborating with the Legal Department for contract compliance and the ESG Team for developing and implementing supplier assessments. By requiring suppliers to meet our sustainability standards, including environmental protection, we encourage more sustainable practices and potential innovations in resource use and waste management throughout our supply chain.

Complementing these efforts, our **Circular Economy Policy**, also developed and implemented in 2025, establishes guidelines for embedding circular economy principles into our operations. This policy aims to minimize waste, optimize resource use, increase the use of secondary (recycled) resources and extend product lifecycles. Led by the ESG Manager, the policy fosters collaboration across various internal departments to integrate circular principles into their processes. It also emphasizes stakeholder engagement, promoting circularity commitments to key stakeholders in our value chain.

Actions

Addressing the Topic of E-waste

Compared to our findings in 2023, we have observed an increasing trend among consumers to use their devices for longer periods, effectively extending product lifecycles. Our research also indicates growing consumer awareness about mobile operators who offer collection and recycling services for old devices. We're encouraged by the positive trends, particularly the fact that 69% of our survey participants expressed willingness to start recycling non-working equipment in the future. Therefore, we at Yettel continue our commitment to tackling the complex issue of e-waste through focused initiatives and collaborative efforts. For 2024, we are excited to introduce the following new sustainability initiatives:

CPE Repair Program

After its launch in 2023, in 2024 we continued to successfully operate our innovative **Customer Premises Equipment (CPE) Repair Program**. This initiative aligns with our commitment to circular economy principles and waste reduction. The program works by renting CPE devices to customers, who return them at the end of their contract. We manage the entire process internally, with devices collected at our shops and returned to our warehouse. Repairs are carried out at our dedicated repair center, after which refurbished devices are repackaged and returned to stores, where they are provided to customers with no discernible difference from new devices.

From the beginning of the program until the end of 2024, we successfully repaired a total of 40,882 CPE devices. **Over 95% of returned CPEs have been repaired and put back into use**, with less than 5% of all CPEs that reached the repair center (including used and faulty devices) being in a condition that can't be repaired. These 5%, however, are not directly disposed – all products which cannot be repaired get properly recycled. This initiative significantly extends the lifespan of our CPE devices, reducing electronic waste and promoting resource efficiency.

Smartphone Universe

Yettel's "Smartphone Universe" service package offers customers a range of benefits designed to **enhance their device experience and promote sustainable practices** such as:

An extended three-year warranty	Various insurance options	Access to certified repair services

A key component of this package is the **"Recycle and Save"** program, which encourages customers to return their old devices for recycling, promoting both cost savings and environmental responsibility.

In 2024, we further enhanced the "Smartphone Universe" package by integrating our new **"Smartphone Diagnostic"** service - a digital tool accessible through the Yettel app that conducts thorough assessments of smartphones and tablets, helping users maintain their devices in optimal condition and potentially extend their lifespan. Notably, in 2024 the Smartphone Diagnostic service was free to use by all mobile device users, regardless of whether they are Yettel clients or not. To access the service, users simply needed to download the Yettel app, making it a widely available tool for device maintenance and longevity.

Recycle & Save

Our "Recycle and Save" program remains a key part of our sustainability efforts in 2024. We continue to offer customers either a fixed discount on a new smartphone or the residual value of their returned device, applicable towards new purchases in our stores.

In 2024, our **advertising campaign focused on devices we keep tucked away at home** which are continuously losing value and encouraging clients and the wider community to recycle their old devices. In exchange for the old devices which are to be recycled, our clients receive discounts for future purchases from our stores.

Our **annual sustainability social research** continues to offer valuable insights into customer behavior regarding electronic waste. In 2024, we observed that **43% of customers are exploring alternative options for their old devices**, rather than keeping them as spares at home or disposing of them with the domestic waste. Encouragingly, we've seen a positive response to our e-waste collection initiatives, with our dedicated bins experiencing increased use.

We've also found that consumers are motivated not only by a desire to reduce environmental pollution but also by the prospect of financial incentives. In fact, nearly 84% of consumers who have handed over an old device for recycling through our programs report taking advantage of discounts on future purchases. The "Recycle and Save" initiative is designed to meet this demand, offering customers an opportunity to contribute to sustainability efforts while benefiting from economic incentives.

Prolonged Warranty on All Smartphones – More Time Together

3 year warranty

Not 2, but 3 years warranty for all smartphones

Longer together

We are committed to tackling the growing challenge of electronic waste with innovative solutions.

To achieve this goal, we continued our industry-leading initiative of offering a three-year free warranty on all smartphones in our portfolio. Our "More Time Together" campaign reflects our dedication to **extending device lifespans and reducing e-waste**. By offering this extended warranty, we're working towards prolonging device lifecycles and helping to conserve valuable natural resources, including electricity and over 70 precious metals required for new device manufacturing.

We cover the following aspects of waste management:

Reduce via repair service and "Smartphone Diagnostic"

Reuse via refurbishment of CPE's and STB's and equipment sold to third parties for further use

Recycle via proper waste management of e-waste through recycling, e.g., bins in stores, Yettel Recycler, "Recycle and Save" service

Targets

At Yettel, we understand the importance of tackling the growing challenge of electronic waste. That's why we have taken a big step forward in our commitment to reducing our environmental footprint and promoting sustainable waste management through our ambitious voluntary target:

We aim to prevent at least **127,000 kg. of e-waste** from going to landfill by 2028.

We're thrilled to report that in 2024, we made great strides towards this goal.

Thanks to our team's dedication and innovative initiatives, we successfully kept **46,855 kg. of e-waste** out of landfills.

This represents a 72% increase compared to the previous year. Since 2022, our cumulative efforts have diverted a total of 94,419 kg. of e-waste from landfills, marking significant progress towards our goal.

Metrics

We're delighted to report the following results regarding waste for 2024:

Information on total amount of waste from own operations	
The total amount of waste	95.29 tonnes
Total amount of hazardous waste diverted from disposal	18.70 tonnes
I. Hazardous waste prepared for reuse	3.92 tonnes
II. Hazardous waste recycled	14.78 tonnes
III. Hazardous waste - other recovery	0
Total amount of non-hazardous waste diverted from disposal	56.47 tonnes
I. Non-hazardous waste prepared for reuse	12.32 tonnes
II. Non-hazardous waste recycled	44.75 tonnes
III. Non-hazardous waste - other recovery	0
Total amount of hazardous waste directed to disposal	0
I. Hazardous waste directed to incineration	0
II. Hazardous waste directed to landfill	0
III. Hazardous waste directed to other disposal operations	0
Total amount of non-hazardous waste directed to disposal	20.12 tonnes
Total percentage of non-recycled waste (%)	21.11%

Putting People at the Center of Everything We Do

Own Workforce

At Yettel, we recognize that our business strategy and success are directly linked to how we manage and support our workforce. We understand that our employees are the key to meeting our customers' needs and driving our business growth. That's why employee care is a crucial part of our overall business approach. We are proud of each team member's achievements and know that their hard work and dedication are the foundation of our shared success. To support this, we invest significant effort in creating a workplace where everyone feels engaged, motivated and satisfied with their job.

In 2025, we developed and implemented a comprehensive **People Policy** that outlines our commitment to creating a positive and inclusive work environment. This policy focuses on several key areas:

Talent Acquisition and Development: We aim to attract, retain and develop top talent through fair recruitment practices, continuous learning opportunities and clear career progression paths.

Diversity, Equity and Inclusion (DEI): We strive to foster a diverse workforce and an inclusive culture where all employees feel valued and respected, regardless of their background or personal characteristics.

Employee Well-being: We prioritize the physical and mental health of our employees through various initiatives, including flexible working arrangements, wellness programs and work-life balance support.

Performance Management and Recognition: We have implemented a robust performance management system that encourages regular feedback, fair evaluations and appropriate recognition for employee contributions.

The policy's strategic objectives are designed to drive our people-centric approach forward. These objectives include maintaining a diverse and inclusive workforce, ensuring continuous employee development, enhancing employee satisfaction and retention and aligning our workforce management practices with ESRS requirements and human rights principles.

To measure the effectiveness of our People Policy and related initiatives, we track several **key performance indicators (KPIs)**. These include our employee engagement score, training hours per employee, gender diversity in leadership roles, health and safety incidents and complaint resolution rate. By monitoring these KPIs, we can assess our progress and make data-driven decisions to improve our workforce management strategies.

We actively incorporate the interests, views and rights of our workforce into our strategy and business model through various engagement mechanisms:

Engagement method	Description	Key actions
Monthly engagement surveys	Confidential assessments on engagement, satisfaction and eNPS	Line managers and company leaders review and discuss results regularly
Focus groups	In-depth discussions on DEI and other important topics	Direct interaction between employees, leadership and HR
Employee-led initiatives	• ESG Crew and Balance Crew – volunteer-based resource groups • Project Management Community (PM Community) - an open community that brings together people involved in project management or those eager to learn more about it	• Organizing employee activities to drive positive change and sustainable practices • Helps our members to find a common language, standardize project management practices and supports colleagues at various stages of their project management journey
Feedback implementation	Analysis of insights from surveys and focus groups	HR and leaders develop targeted 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
Performance appraisals	Providing HQ employees with annual performance reviews	Promoting employees' growth
Digital Office App	Company mobile application for internal communication, information on benefits, policies and short surveys	Employees get informed on news, access policies and participate in surveys
Internal trainings	Webinars, learning sessions and knowledge platforms for skill development	Providing employees with access to knowledge, required to grow
Intranet SharePoint	Channel for useful information and company policies	Providing employees with one-stop-shop for all company information and policies they might need

By engaging employees with **monthly surveys**, we strive to gather feedback and insights which help us respond to workplace needs and create conditions for employees which improve and enhance their work environment. These comprehensive surveys cover a wide range of topics, providing valuable insights into our organizational pulse. The topics include organizational climate and trust, perception of people leaders and work environment, employee happiness, engagement and motivation, well-being and psychological safety, sustainability and diversity, equity and inclusion (DEI). In 2024, Yettel has maintained high scores for all measured indicators in the LutherOne platform used for employee engagement and satisfaction surveys, with significant growth achieved in certain categories. The company was awarded with **two certificates** from LutherOne- **"Voice of employee Award 2024: Talent Management"** and **"Voice of employee Award 2024: Readiness for the future"** – where we achieved the highest results of the **Talent Management Score** and **Readiness Index** in 2024. The last results in 2024 are compared across LutherOne clients who are measuring the Talent Management Score and Readiness Index.

All of this also reflects on the overall feeling of employees at work:

90%

of respondents fall into the "happy and engaged" category, according to the annual results.

At Yettel, we demonstrate a proactive approach to adapting our workforce strategy through our **Strategic Workforce Planning** process. We initiate this process during our company strategy development or when planning strategic programs, focusing on our long-term workforce needs and development over a three to five-year horizon. Our Total Rewards and People Analytics team conducts comprehensive analyses, including baseline assessments, workforce supply and demand evaluations and gap analyses. We examine critical aspects such as our resource adequacy for strategic ambitions, capability and skill gaps, cultural alignment and identification of critical roles and people-related risks and opportunities. Based on these insights, we develop action plans to address identified gaps and leverage opportunities, ensuring our workforce strategy remains aligned with our evolving business needs and strategic objectives. This dynamic process allows us to continuously refine our approach to workforce management, responding effectively to identified impacts and future challenges.

Our main **positive impacts** stem from our inclusive work environment, flexible working policies, as well as our commitment to diversity, equity and inclusion (DEI) and female representation in the technology team. Through these positive impacts we aim to create a work environment which benefits all employees and provides sufficient working conditions for employees with different needs including, but not limited to, employees with family responsibilities, employees from minority groups, employees with disabilities and others across our operational sites.

Our **material risks** include potential sanctions related to workplace accidents, employee burnout and talent retention challenges. On the other hand, **opportunities** arise from our focus on diversity, skill enhancement and employee well-being, which contribute to innovation and improved business solutions.

As we further embed sustainability into our operations, we aim to keep helping our employees grow in their careers by providing support whenever there is need for advancing and expanding the horizons of their knowledge of specific ESG topics.

We recognize that certain groups within our workforce may be at greater risk, including those in specific operational roles or locations. Our efforts in the area of DEI aim to address potential disparities based on gender, age, disability, ethnicity and other personal characteristics. The implementation of our People Policy in 2025 further strengthens our commitment to addressing these challenges and creating a more equitable workplace for all.

At Yettel, we understand that the diverse aspects of the DEI area could impact different groups of people based on gender, age, disability, ethnicity and other personal characteristics. In this aspect we focus our DEI strategies to address challenges - for example colleagues with disabilities are potentially more susceptible to experiencing discrimination. We regularly conduct and collect internal feedback from colleagues. During the evaluation of out material impacts, we identified the following actual **positive outputs** for Yettel's employees:

> People are feeling respected and valued in the organization

> People believe that their teams are diverse in terms of experience, culture and perspectives

> People share they have equal opportunities for development and promotion compared to their colleagues

Together with the management team, we address potential discrimination based on gender, age, ethnicity and other personal characteristics. For our frontline staff in our shops, we aim to recruit people of diverse ages and genders and make conscious efforts to promote these career opportunities to various societal groups.

Health and Safety

At Yettel, we understand that the diverse aspects of our work can involve risks to our team's health, safety and well-being. We've made it our top priority to address these challenges head-on by developing a comprehensive approach that doesn't just meet industry standards - it exceeds them. Our aim is to foster a work environment that's not only safe but also supportive, where every member of our Yettel family can thrive. Our strategies include flexible working hours, mental health resources, regular safety training and generous time-off policies. While we acknowledge areas for improvement, such as enhancing our education programs, we are committed to continuously improving our practices to ensure the highest standards of health and safety for all our employees.
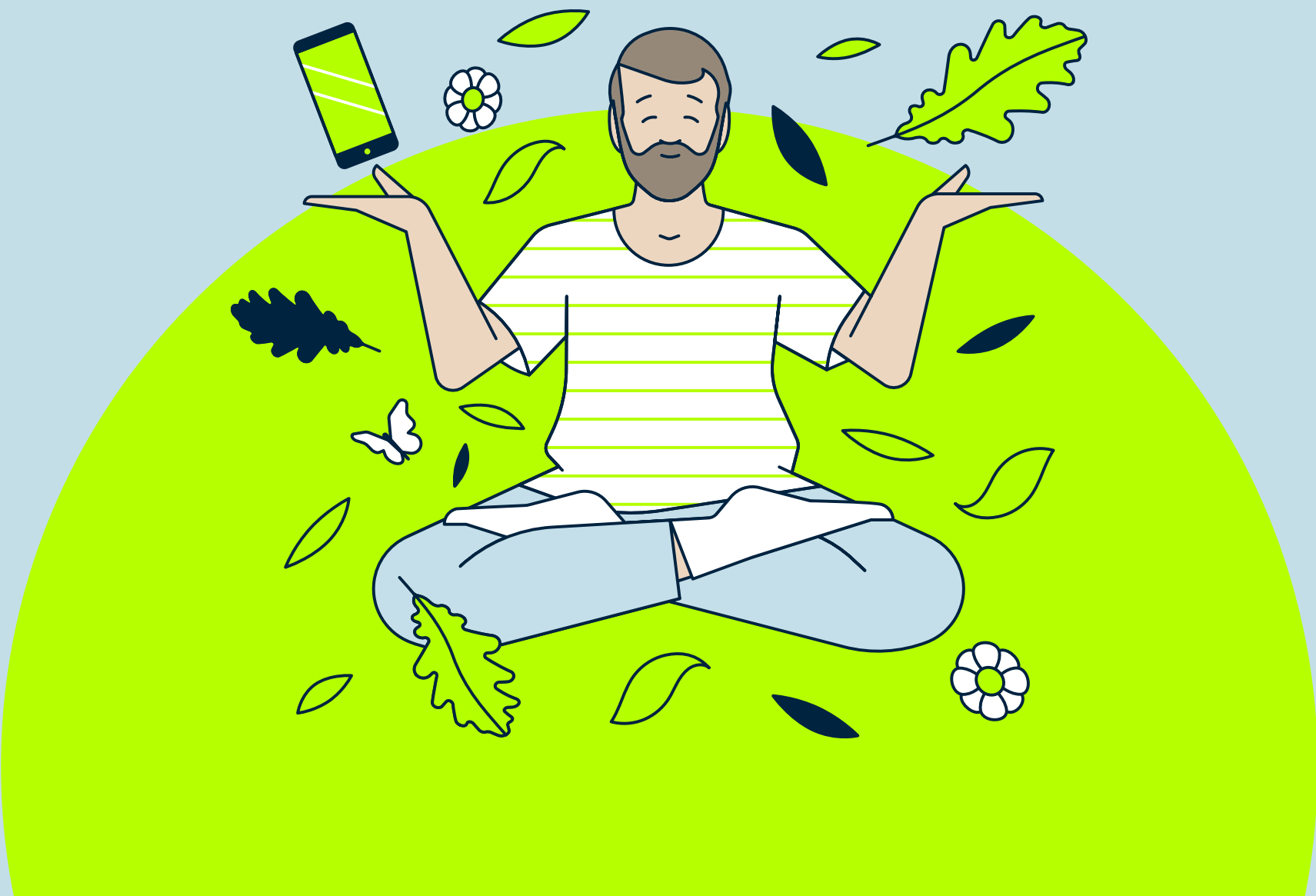
Policies

The main process, that allows us to prioritize the safety and well-being of our employees, is our comprehensive **Occupational Health and Safety Management System**, implemented in 2017 and certified to **ISO 45001 standard**.

The cornerstone of this system, our **Health and Safety Policy**, outlines the procedures for hazard identification, risk assessment and accident prevention. This policy applies to all employees without exception and consists of a broader framework of manuals and measures.

We regularly conduct hazard assessments and risk evaluations, implementing necessary measures to ensure compliance with the highest safety standards and legal requirements. Our occupational health services focus on prevention, health promotion and stress management, supported by regular medical check-ups for all employees.

Our management team and Occupational Health and Safety (OH&S) officer oversee all safety practices, while the Health and Safety Committee promotes a culture of safety awareness. We encourage employee participation through accessible channels for reporting risks and suggesting improvements. We provide ongoing training to ensure all employees are well informed about safety practices. Our commitment extends to strict compliance with all applicable occupational health and safety laws and regulations, including national regulations for the prevention of forced or child labor.

Our health, safety and well-being efforts are further strengthened by our People Policy, which aligns us with international human rights principles and labor standards.

Social Protection

To ensure our employees are taken care of, we follow the local regulations for social protection system that covers 100% of our workforce. We ensure our employees are protected against income loss due to various life events. This includes coverage for sickness, work-related injuries and disabilities, parental leave, retirement and other life events which could result in income loss.

Actions

In our commitment to comprehensive care, we once again provided the opportunity for all our employees to have preventive **medical check-ups** in 2024. Furthermore, our **Health Month** initiative in April offered a comprehensive approach to well-being across different life stages through various informative sessions. We are also proud of our **Re:Join Program** – a long-standing initiative we've developed to support employees returning from extended leave, such as parental leave or long-term illness.

Our well-being efforts encompass a variety of initiatives aiming to enhance health awareness and inspire positive lifestyle changes. Throughout the years, we have seen how these initiatives have boosted morale and enhanced overall performance across our organization. At the heart of all these efforts is our **Balance Crew** – a dedicated group of volunteers who initiate, coordinate and facilitate a diverse array of well-being activities, focused on three key topics: health, safety and sports; mental well-being; and personal finance.

We take mental health seriously, and that's why we've ensured that all our employees have **on-demand access to a corporate psychologist**. To stay in tune with our workforce's evolving needs, we regularly conduct well-being surveys and focus groups. Our quarterly Health and Safety Committee meetings provide another way for employees to voice their concerns.

Listening to our employees' feedback has helped us fine-tune our well-being approach in 2024 to better cater to different life stages – from those starting families to those approaching retirement. Our Balance Crew has played a key role in launching new and exciting initiatives that not only enhance well-being but also foster a strong team spirit and promote healthier lifestyles, all while supporting work-life balance.

We're pleased to share that we saw **strong engagement** in 2024: more than 200 employees participated in 13 open sessions covering crucial topics like personal finance, psychology and healthy habits.

Our **"Adventures League"**, an exciting team competition set in nature, brought together more than 100 colleagues.

April 2024 was our dedicated **Health and Safety month**, with 215 employees taking part in various initiatives.

We organized 17 sports activities, ranging from marathons and tennis tournaments to step-counting challenges, encouraging active participation from all employees.

Our **office workouts** have been a hit, consistently attracting over 30 participants. Activities cover a wide variety of sports, suitable for everyone to join including yoga, Pilates, Bulgarian folk dance, morning and evening functional workouts and ski afternoons.

We rely on close collaboration with internal teams to identify the most appropriate measures to implement. In particular, we work closely with colleagues from the Balance Crew and the Health and Safety Committee to ensure that the actions we take are relevant, effective and aligned with the real needs of our people. Their input is essential in shaping initiatives that support both well-being and a safe, inclusive working environment.

We apply a proactive approach to health and safety in our decision-making and the implementation of all activities that pose risks to employees' health and safety, in order to prevent injuries and ill health for all employees and others working for the company. Regular risk assessments of Yettel work premises are conducted along with annual internal and external audits.

Balance Crew Activities and Calendar

Regular activities

Monday	Tuesday	Wednesday	Thursday	Friday
Morning **"Improve Yourself"** Training Session	Morning **Pilates**	Morning **"Improve Yourself"** Training Session	Morning **"Improve Yourself"** Training Session	Morning **Pilates**
	Office Massages		After work **"Drinks on the town"** Every last Thursday of the month	
After work **Yoga**	After work **"Improve Yourself"** Training Session	After work **Folk dances**	After work **Yoga**	

Yettel. | **2024 Wellbeing Calendar**
Stay in balance with yourself every month

January
Personal finance session
And for a bit of movement – **a ski afternoon!**

February
Session with a corporate psychologist
And once again – **ski afternoons**

March
Personal finance month
Fingers crossed for snow in March – **one last ski before the season ends!**

April
Health and safety month
Why not combine it with **No Elevator Month?**

May
Yettel football tournament
And our favorite challenge – **10,000 steps**

June
Adventures League
We're hitting the court in the CETIN Tennis Tournament

July
Water sports at Pancharevo

August
Water sports at Pancharevo

September
Yettel tennis tournament

October
Session with a corporate psychologist
And for a healthy body – **an inter-team competition and 10,000 steps**

November
Personal finance session
Back in shape again with **No Elevator Month**

December
Christmas and New Year

Targets

We have developed a comprehensive set of health and safety targets for 2024, focusing on enhancing our workforce's well-being:

1

Employee Health Awareness

We are committed to hosting quarterly open sessions on diverse health and lifestyle topics such as alternative medicine, first aid, nutrition, active sitting, mindfulness and emotional well-being. We also create educational materials on health and safety, covering work-related and general health issues such as proper posture, first aid and heat stroke prevention. Additionally, we offer ongoing safe driving courses for our employees - 26 new team members successfully completed this training in 2024.

2

Crisis Response Readiness

We aim to conduct bi-annual evacuation drills and provide first aid training twice a year for all our employees. In 2024, we successfully carried out an evacuation exercise and conducted first aid training for 50 of our health and safety representatives, achieving 100% participation. We also held two defibrillator training sessions. Every two years, we offer fire extinguisher training for our health and safety (H&S) responsible employees, with our most recent session in 2023 seeing full participation.

3

Workplace Health and Safety Improvements

We regularly perform on-site and remote inspections to ensure H&S compliance. In 2024, we completed close to 150 store inspections and issued prescriptions for improvements where needed. We also hold quarterly meetings with our H&S representatives, providing a platform for feedback, issue identification and solution proposals.

4

Physical Activity Promotion

We offer our employees preferential sports card options, with two types currently available. Our "Bike to Work" initiative aims for 50% average usage of available bicycles during summer months. In 2024, we came close to this target by achieving 47% usage. We also organize various company-wide sports activities, including office yoga, Bulgarian folk dance lessons and different workouts, aiming for at least three activities weekly.

5

Stress Reduction

We conduct open sessions on mental health topics. In 2024, we held four specialist-led sessions, covering themes like interpersonal communication and burnout prevention. We also provide our employees with weekly access to a corporate psychologist.

6

Additional Health Services

We arrange annual preventive medical check-ups and provide additional accident and supplementary health insurance for all our employees.

These initiatives reflect our dedication to enhancing various aspects of employee health and safety, from raising awareness and improving crisis readiness to promoting physical activity and reducing stress.

Health and Safety targets and initiatives are elaborated in collaboration with Health and Safety committee members. Performance of the different programs and initiatives is regularly monitored during our quarterly Health and Safety Committee meetings.

As part of our continuous efforts to support employee well-being, we introduced in-office yoga sessions in 2024 to help address work-related stress. This addition complements our broader strategy to foster a healthier and more resilient work environment.

Health and Safety Metrics

	2024
Percentage of own workers who are covered by Health and Safety Management System based on legal requirements and (or) recognised standards or guidelines	100%
Number of fatalities in own workforce as result of work-related injuries	0
Number of fatalities in own workforce as result of work-related ill health	0
Number of recordable work-related accidents for own workforce	2
Number of cases of recordable work-related ill health of own workforce	0
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health	27

Work-Life Balance

As part of our commitment to help our employees maintain healthy work-life balance, we offer **family-related leave** to all our staff members. In 2024, 13.26% of female and 0.10% of male employees took advantage of this option.

Diversity, Equity and Inclusion - DEI

At Yettel, we recognize diversity, equity and inclusivity as fundamental pillars of our organizational culture and success. Our commitment to fostering an inclusive work environment where every employee feels valued and respected is reflected in our comprehensive approach to addressing these issues. Our initiatives span across various areas, including gender representation, pay equity, accessibility and ethnic and age diversity. We actively engage our employees through surveys, focus groups and employee-led initiatives to continuously improve our DEI practices. This commitment has been recognized externally, as evidenced by our Top Employer certification for the second consecutive year, particularly excelling in DEI with a score significantly above the industry average. Through these efforts, we strive to create a diverse and inclusive environment that not only benefits our employees but also enhances our business solutions and societal impact.

Policies

To guide our DEI efforts, we have developed a thorough policy framework, which includes our **Code of Ethics**, our **Ethics and Compliance Policy** and our **Group and Local DEI Policy**, which was introduced in 2024. The DEI efforts and practices are also covered in our newly developed **People Policy**, which we implemented in 2025.

Our Code of Ethics 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 it also goes way beyond our own workforce, aiming to create positive impacts for all our vendors. To ensure accountability, we've established a **grievance mechanism** through our Ethics and Compliance Policy, 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 our Yettel family, regardless of their position or type of contract.

Our **DEI Strategy** is rooted in our core values of being **"Helpful"** and **"Responsible"**. We actively work to eliminate discriminatory language and practices related to race, gender, age, religion, disability, sexual orientation and other protected characteristics.

We also invest in **DEI trainings and awareness programs**. Our primary focus is on addressing unconscious biases and preventing the potential mistreatment that may arise from these biases throughout various stages of the employee lifecycle. To achieve this, all our employees are required to pass our mandatory unconscious bias training, with particular emphasis placed on the DEI education of our people managers and recruiters.

Actions

Our dedication to DEI is not just a corporate priority – it is a shared value embraced by our workforce, with 87% of our employees recognizing its importance. This collective commitment fuels our wide-ranging DEI efforts and initiatives, from promoting gender equality and supporting individuals with different abilities to enhancing accessibility for our customers and nurturing young talent.

To lead our DEI initiatives and manage our material DEI impacts, we have established a **dedicated cross-functional team**. This interdisciplinary group is led by our **ESG Team** and includes representatives from **Human Resources**, **Retail Network Development**, **Brand and Marketing Communications** and **Corporate Communications** departments. The team is tasked with monitoring DEI impacts, developing solutions and tracking our performance in minimizing these impacts. Their work is structured around **three key DEI pillars: inclusive employer, inclusive brand and digital inclusion**. This interdisciplinary approach ensures that DEI considerations are integrated across all company departments.

In 2024, we continued some of our long-standing initiatives. The **"Side by Side" program**, celebrating its 10th anniversary in 2024, supports the integration of individuals with disabilities into the workforce. The **"Second Shift"** program offers teenagers, who are children or close relatives of employees, valuable work experience across various departments. **"Hub by Yettel"** provides young talent with hands-on experience in the telecommunications industry, boasting a strong retention rate. The **"Yettel Teen Academy"** offers adolescents insights into corporate operations and crucial societal topics. Lastly, the annual **Yettel Family Day** invites employees' children to the company headquarters, fostering a deeper understanding of the work environment and ESG commitments.

Top Employer

In 2025, Yettel received the Top Employer certification for a **second year in a row**, remaining the sole Bulgarian telecommunications provider to receive this esteemed recognition from the international Top Employers Institute. This accolade places us **among the top 60 telecommunications companies in Europe**.

The certification resulted from a six-month independent audit evaluating our human resource policies and practices in the year 2024 across six key areas and 20 crucial topics, including people strategy, work environment, talent acquisition, learning and development, organizational change, ethics and employee well-being.

We surpassed the average performance of certified European telecommunications companies in 10 out of 20 audited areas, specifically excelling in aligning people strategy with business goals, work environment, employer branding, employee engagement and sustainability. Notably, we achieved a **90.74% score in DEI** – 17% above the industry average.

We also excelled in the categories of purpose and values, where we scored a perfect 100% (14% above average), and in **employee well-being**, with a **score of 81.49%** (10.28% above average).

Unconscious Bias Training

In 2024 we also expanded our Unconscious Bias Training Program. Previously limited to senior managers, the training was successfully **extended to all employees at our headquarters** in 2024. Since then, 880 out of 1080 employees (**81%** of total employees), **have completed the training**, demonstrating a strong interest in contributing to an inclusive workplace culture. In 2025, we plan to roll out the training to all the rest of our employees.

We have identified the Unconscious Bias Training as the most appropriate initial step in our DEI program to prevent negative impacts related to discrimination. This decision is rooted in our understanding that many instances of favouritism and discrimination often stem from unconscious biases. By addressing these hidden biases first, we aim to lay a strong foundation for our broader DEI efforts.

Collaboration with the Emprove Foundation

Domestic violence is an issue that affects a significant portion of Bulgarian society. According to a study by NSI in 2021, approximately 1 in 10 Bulgarian women have experienced some form of domestic or workplace violence in their lifetime. This sobering reality underscores the need for action not just in homes, but also in workplaces.

In 2024, we took a proactive step by partnering with the Emprove Foundation, an organization dedicated to combating domestic violence. We are proud to have earned the **Emprove HERO Badge**, a recognition awarded to companies that meet rigorous standards for employee support and safety. By addressing domestic violence and its impact on our workforce, we are not only supporting our employees but also contributing to broader societal change.

Fighting Unconscious Bias at the Workspace

In 2023, we implemented Unconscious Bias Training Program starting with the HR department and extended management (including senior management at CxO and CxO - 1 level).

In 2024, we expanded our initiatives to include open discussions on topics directly related to women in the workplace, with a particular focus on women in technology roles. Through our Teen Academy program for employees' children, we're also working to inspire the next generation of female tech professionals by addressing gender-specific challenges and promoting inclusive practices in the tech industry.

Female Representation Actions

We're keenly aware of the growing importance of female representation in the workplace, which reflects broader societal conversations about equality and inclusion. We have noticed that this issue is particularly prominent in the ICT (Information and Communications Technology) sector, where global trends show a lower percentage of women in the workforce. We've also observed similar disparities in managerial roles across various industries.

Partnership with the LEAD Network

In 2024, we took another significant step towards fostering diversity and inclusion by partnering up with the LEAD Network (Leading Executives Advancing Diversity). The LEAD Network is a prominent organization dedicated to promoting diversity and inclusion, by providing valuable resources, mentoring programs and networking opportunities. Through this strategic partnership, we aim to **enhance our approach to diversity and inclusion by leveraging collective knowledge and industry-wide best practices**.

Our participation in the LEAD Network, although still in its early stages, is primarily focused on exchanging experiences and collaborating with other retailers to develop comprehensive DEI programs and transform the retail sector's approach to diversity, equity, and inclusion. We are actively involved in the Retailers Engagement group, which concentrates on sharing and creating standards for best practices in DEI within Bulgaria.

Inclusivity for All Our Customers

We are deeply committed to extending our DEI practices beyond our workforce, striving to create an **accessible environment for all our customers and visitors**. We're proud to say that we've successfully implemented comprehensive measures to ensure 100% accessibility at our physical locations for people with physical disabilities. All our retail stores are thoughtfully equipped with special ramps, including robot ramps and mobile ramps. In our central offices, we have adapted our facilities in ways that accommodate people with limited mobility. Recognizing the growing importance of **digital inclusion**, we are actively enhancing the accessibility of our website, mobile application and advertising communication. Our goal is to ensure a more inclusive experience across all our customer touchpoints.

Our initiatives and programs designed to foster an inclusive workplace have yielded tangible results. We're proud to report that 87% of our employees believe DEI contributes positively for the company success. Even more encouragingly, 88% of our team members feel a strong sense of inclusion within their immediate work groups.

Despite these positive results, we continue to seek opportunities to improve our DEI practices and efforts. We do this through multiple feedback channels, such as annual surveys, monthly questionnaires in the Luther One platform, our dedicated whistleblowing channel and through our HR Business Partners.

Targets

Diversity, Equity and Inclusion

We believe that people with disabilities can contribute to real positive change in the work environment, the labor market and attitudes in society. At Yettel we see their inclusion as a strategic opportunity for business growth and long-term sustainability in society.

Side by Side Program

As part of our long-standing initiative, Side by Side program, we established a target that we continue to build on annually:

To hire 5 FTE with disabilities in different roles and teams every year.

Every year we evaluate the inclusion and progress of hired colleagues and explore business opportunities to transition key performers to permanent roles. As part of our approach and successful career development of these people, we continue to build on the 10-year legacy of the program.

In 2024 we started our key partnership with the LEAD Network (Leading Executives Advancing Diversity), where collaboration and knowledge sharing gives us many opportunities to transform the retail sector's approach to diversity, equity and inclusion. Through this partnership, we are gaining insight into how we can extend our Side by Side program beyond our headquarters. This perspective allows us to explore ways of introducing employees with disabilities into our store network, broadening the scope of our inclusion efforts.

Female Representation

Recognizing our role in the important social dialogue regarding female representation in the ICT sector, we've taken a formal step to commit ourselves to achieving balanced gender representation across most positions and levels within our organization. As part of our Sustainability Strategy 2028, we have established a target that we continue to build upon annually:

To reach 40% female representation in our technology division by 2028.

This target is not static; each year, we evaluate our progress and implement new initiatives to ensure we are on track to meet and potentially exceed this goal, reflecting our ongoing commitment to gender equality in the tech industry. In 2024, we made significant strides towards our goal of increasing female representation in our organization.

Through our proactive approach and successful initiatives, we achieved notable progress, with women now occupying 36.4% of the positions in our technology division.

Diversity Metrics

In 2024, we updated our approach to reporting company headcount, which affected how we present our employee numbers. Previously, we reported FTEs (full-time equivalents) based on end-of-year figures. However, to provide a more accurate representation of our workforce throughout the year, we now calculate **Active Headcount figures**, using the average of monthly figures.

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. While this new method offers a more comprehensive view of our team's composition over time, it's worth noting that direct comparisons with previous years' data may not be entirely appropriate due to this methodological shift. We believe this change will ultimately provide our stakeholders with a clearer and more representative picture of our workforce dynamics.

Age Break-Down by Function (2024)

Based on Active Heacount*	Leadership team	Management	Non-management	Grand total
Client-facing				
< 29	0.0	0.0	553.7	553.7
30-49	2.0	31.1	699.0	732.1
> 50	0.0	4.4	30.3	34.7
Others				
< 29	0.0	2.5	85.6	88.1
30-49	24.1	63.4	295.6	383.1
> 50	4.3	3.8	25.3	33.4
Technology				
< 29	0.0	0.0	21.6	21.6
30-49	4.9	5.0	75.0	84.9
> 50	2.1	2.0	10.8	14.8
GRAND TOTAL	**37.3**	**112.2**	**1796.8**	**1946.4**

*Due to the new calculation methodology described above FTE numbers are no longer a rounded number.

Employee headcount and proportion by gender

Female
1,182

Male
764

60.74%   39.26%

Total employees	1,946
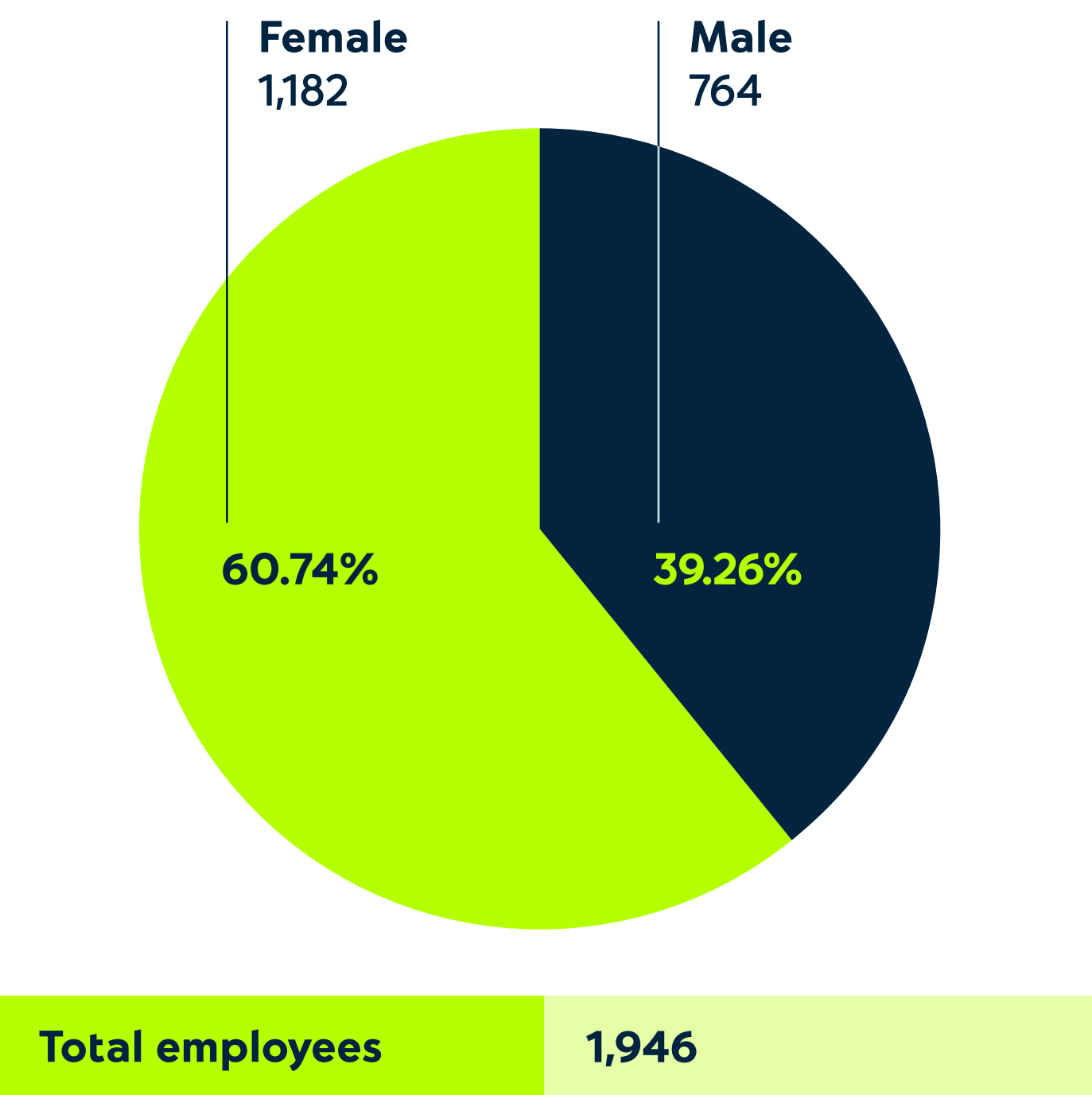
Breakdown by gender of the number of employees with disabilities, 2024

Gender	Employees with disabilities
Female	21
Male	41

The numbers are yearly averages of active employees with disabilities who were employed with Yettel in 2024.

Active Headcount of Men and Women across all Business Operations (2024)

Based on Active headcount	Female	Male	Grand total
Client-facing (all roles directly dealing with customers, e.g., shop staff, call center, business sales)	840	481	1,320
Technology (all roles in the technical division)	44	78	121
Other (all the rest, such as Finance, HR, Marketing, Legal, etc.)	299	206	505
Total	1,182	764	1,946

Proportion of men and women in management roles (leaders on levels CEO-1 and CEO-2, active headcount)

Female 65   44%   Male 84   56%

Total	149
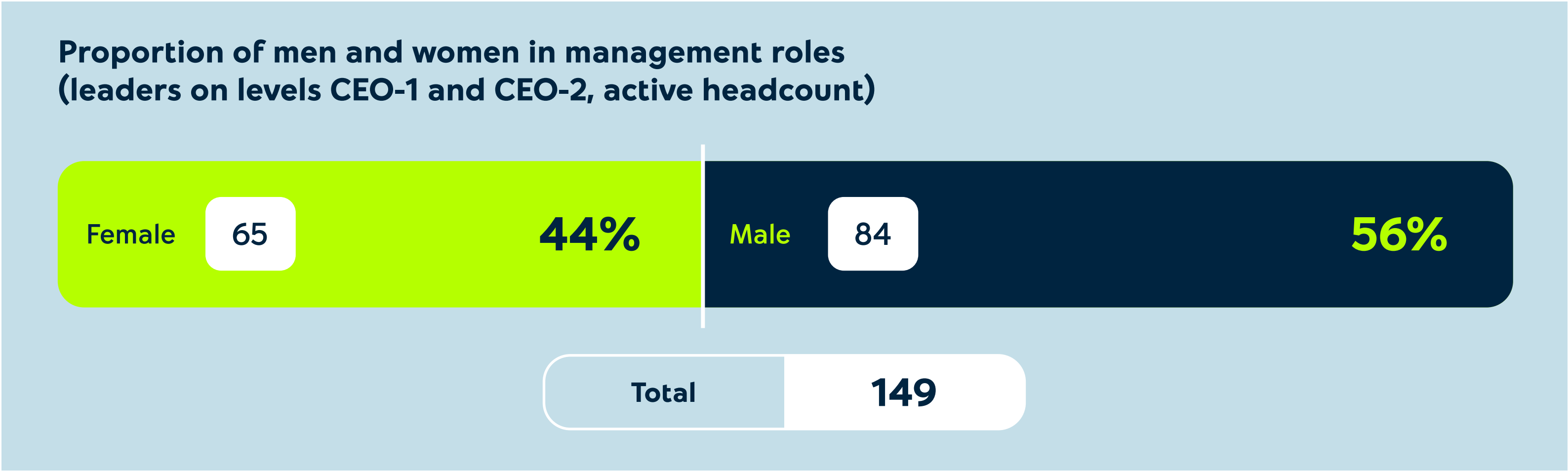
Additionally, in 2024, we thoroughly investigated all reported incidents and found **no substantiated cases of discrimination** within our workforce.

Training and Skill Development

At Yettel, we recognize that our employees are the key to our success and we are dedicated to helping them grow in their careers. Our approach to employee development isn't just about improving job skills – it is driven by our company goals and employees' career aspirations. From our thorough onboarding programs to specialized leadership training and mentoring initiatives, we have created an innovative learning ecosystem that supports continuous growth at all levels of our organization. By investing in our employees' professional growth and personal well-being, we not only enhance the company's performance but also contribute to a more fulfilling and sustainable future for our workers.
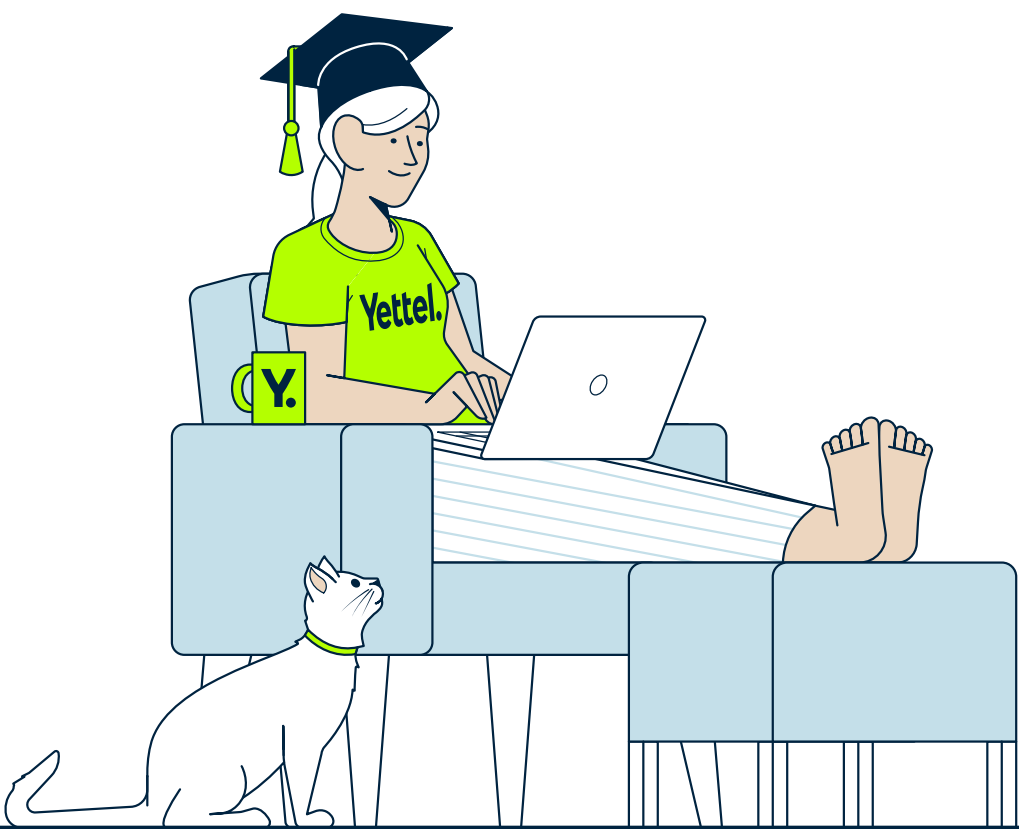
Policies

At Yettel, we demonstrate our commitment to responsible business practices through our **comprehensive training systems and programs**. These systems are designed to ensure we meet all regulatory requirements for employee training. We have established robust policies and procedures that govern our training initiatives, covering a wide range of topics relevant to our industry and employee roles.

We maintain a **catalog of trainings**, ensuring that employees receive up-to-date and relevant information on a wide variety of topics including but not limited to ESG, data privacy, information security, health and safety, ethics and compliance, and others. Our training process includes planning, preparation, assignment and monitoring, with regular reporting to our Chief Executive Officer. This systematic approach to training and development allows us to address material impacts, risks and opportunities related to our workforce effectively, while also ensuring compliance with applicable laws and internal rules.

Our commitment to employee development is exemplified in our **Local Manual "Training of Employees"**. This manual outlines our approach to providing employees with access to learning, development and training opportunities aligned with both our strategic objectives and individual employee needs. The **Chief Human Resources Officer** oversees the training manual, while the **Talent Development Department** coordinates most training activities. Our annual training program is developed through a comprehensive **Training Needs Analysis (TNA)**, involving collaboration between the Talent Development Department, HR Business Partners, directors and other relevant people leaders. This ensures that our training initiatives address performance improvement, future skills demands and individual development needs.

Our training process is highly structured, with clear procedures for requesting, approving and evaluating training programs. We place a strong emphasis on new **employee onboarding**, which includes mandatory e-learning on crucial topics such as Information Security, Data Privacy, ESG & DEI, and Health & Safety regulations. To measure the effectiveness of our training initiatives, we track key performance indicators including training satisfaction, participation rates, training hours per employee and training cost per employee. This data-driven approach allows us to continuously refine and improve our training programs to better serve our employees and business objectives.

Our efforts for providing employees with quality training and development opportunities, as well as our goals for talent acquisition and retention, are also reflected in our newly introduced **People Policy**.

Through these policies and practices, we aim to create a well-informed, skilled and ethically aware workforce, capable of navigating the complexities of our industry while upholding the highest standards of professional conduct.

By maintaining these structured training frameworks, we not only ensure compliance with regulatory standards but also reinforce our dedication to responsible corporate conduct. Our approach to training reflects our proactive stance in meeting both legal obligations and our own high standards for employee development and organizational integrity.

Actions

Furthermore, we implemented a **Local Training Strategy** that is designed to meet both organizational objectives and individual employee development needs. This comprehensive approach to learning and development is regularly refined through a biennial training needs assessment. To ensure the effectiveness of our training programs, we actively seek and analyze feedback from both employees and leadership. This input is crucial in shaping and improving our training initiatives.

Our training strategy places a strong emphasis on thorough **onboarding for new employees**. This includes educating them about company values, departmental functions and product/service knowledge. For those joining our retail teams, we provide specialized training focused on client interactions and data privacy protocols. We also recognize the unique needs of **newly appointed managers**, who receive targeted training to enhance their leadership skills, covering key areas such as people management, emotional intelligence and recognizing unconscious bias. This additional training is aimed at fostering fair decision-making processes and effective team leadership.

Our commitment to employee development is not just in words but also in substantial financial investment. **In 2024, we invested over 400,000 BGN into employee trainings**, demonstrating our dedication to nurturing talent and fostering growth within our organization.

In 2024 we continued to uphold a strong commitment to employee development and sustainability through various longstanding initiatives.

Training category	Trainings continued in 2024
ESG Trainings	• Our ESG Trainings program successfully introduced comprehensive e-learning modules, achieving high participation rates across the organization • The ESG Academy, in collaboration with Sofia University, offers in-depth modules on essential sustainability topics
Onboarding	• "Hop On Yettel" Days provide new employees with a holistic understanding of operations through a three-part onboarding program. The company offers specialized induction for store employees, including a dedicated Sustainability module
Upskilling	• Yettel provides annual interviewing skills training for managers to ensure effective and non-discriminatory practices. • A company-wide mentoring program fosters knowledge sharing and professional growth
Leadership Skills	• Targeted training programs focus on digital upskilling and leadership development • The Project Management Academy continues to develop skills for managing large-scale projects, utilizing internal expertise for the first time in 2024

Whistleblowing Training

In 2024, we took a big step forward in our commitment to ethical business practices by launching a whistleblowing training program. We designed this program to give all our employees the knowledge and confidence they need to speak up if they see something that doesn't seem right. Our new training covers key themes, from explaining why whistleblowing is important for our company's integrity, to helping everyone understand what kinds of issues they should report and how to do it following Yettel's policies.

We've made the training engaging and interactive, using a **mix of e-learning modules and during employee onboarding sessions**. We also made sure to address common worries about whistleblowing and explained the protections we have in place for those who come forward. With that in mind, we developed a comprehensive **Ethics and Compliance Training Program** (including multiple training modules) which will be rolled out to all employees by end of 2025.

Growth Mindset

Yettel is actively pursuing digital transformation with the goal of continuously digitizing its operations. This ambitious target requires a significant shift in corporate culture and mindset, which is the primary focus of the Growth Mindset program. The initiative aims to shape employee attitudes to better manage change, foster growth and successfully achieve organizational goals.

The program targets Yettel Bulgaria's employees, with a particular emphasis on senior management and people leaders at all levels and senior experts. These key groups are expected to serve as role models and ambassadors, while also raising awareness and cultivating a growth mindset throughout the organization.

Targets

At Yettel, we approach training and development with a tailored strategy. While we don't have overarching company-wide targets, **each of our training programs is designed with specific completion rate goals**, ensuring focused and effective skill development across various areas of our organization.

Training and Skills Development Metrics (2024)

Performance reviews and career development	Female	Male	Total
Number of regular performance and career development reviews provided to employees within the undertaking in the reporting year	3,701	2,204	**5,905**

Training	Female	Male	Total
Number of training hours on mandatory and statutory training offered to and completed by own employees	36,463.99	27,221.64	**63,685.63**
Number of training hours on career and skills development training offered to and completed by own employees	6,555.47	4,464.28	**11,019.75**
Total number of training hours offered to and completed by own employees	43,019.46	31,685.92	**74,705.38**
Average number of training hours per employee	36.97	40.65	**38.45**

Other Workforce Information

Adequate Wages and the Gender Pay Gap

At Yettel, our dedication to equality and inclusion is also reflected in our compensation policies using internationally recognized gender-neutral methodologies to ensure there are no gender-based wage gaps. It is our priority to make sure **our team members are rewarded purely based on their contributions to our objectives, regardless of gender**.

Our compensation system is designed with fairness in mind. We use identical job descriptions for all employees, regardless of gender, to determine salaries. When it comes to performance-based pay, we use a robust management system to ensure bonuses are awarded based on achieving agreed-upon targets. While we don't currently have collective bargaining agreements, we make sure our team's working conditions are well regulated through our own policies, including **Yettel's Internal Labor Regulations**.

Furthermore, we are committed to ensuring that all our employees receive an adequate wage. Our compensation policies strictly adhere to and often exceed minimum wage requirements, guaranteeing **no employee is paid below what is considered an adequate living wage**.

In 2024, **100% of our employees received at least one performance review**. Some of our departments, like Consumer Sales, have more frequent evaluations. For example, retail store team members have monthly tracking of performance.

Our remuneration system, which applies to everyone from new hires to senior management, has three main parts:

1.

Basic Salary

This is 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

This 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. We also offer bonus schemes to motivate and retain employees who contribute to the company's performance.

3.

Other Remunerations

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 personal labor contract. Additionally, team members in 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.
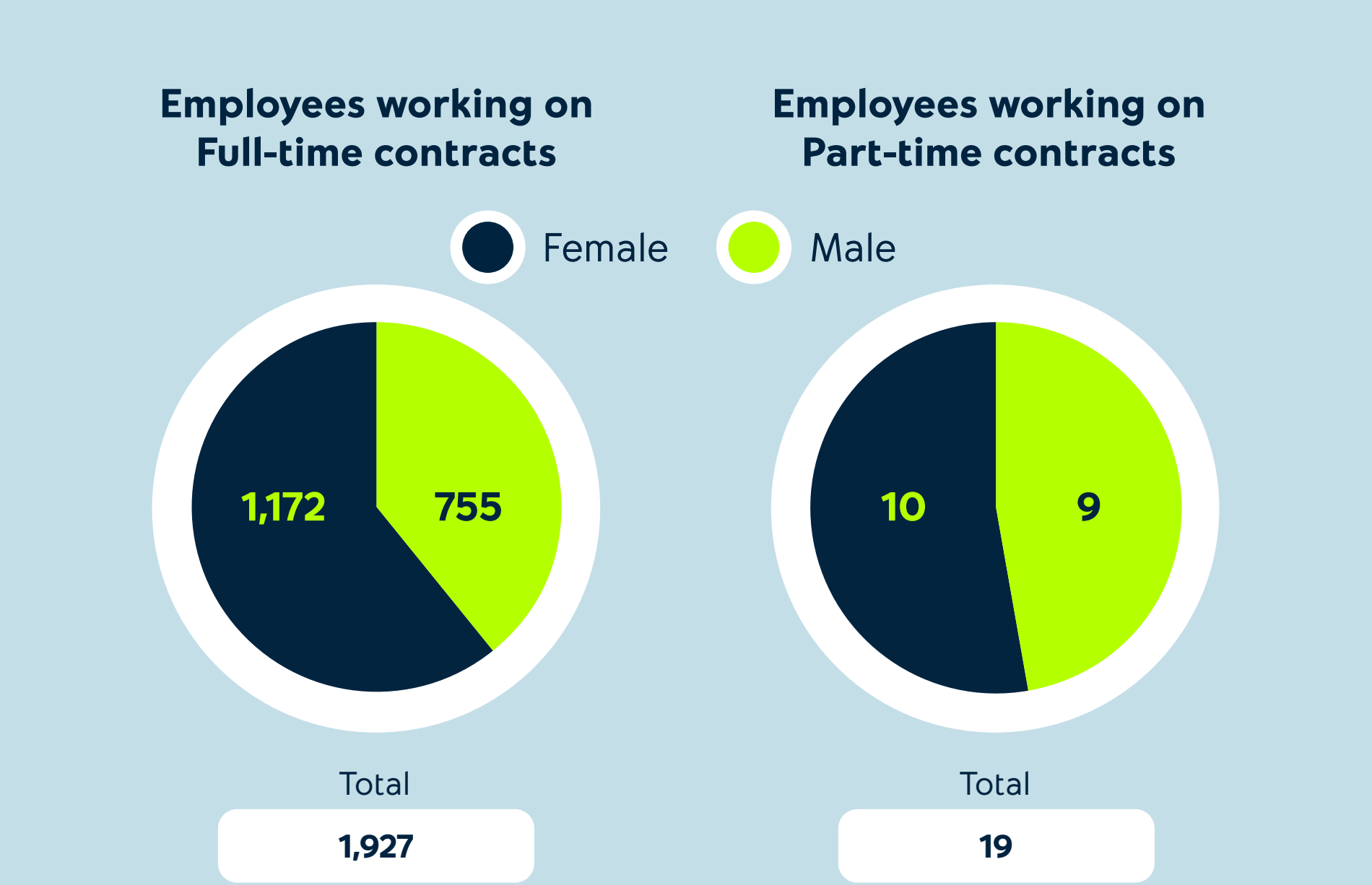
Additional Benefits

Going hand in hand with our competitive wages, we have developed a comprehensive benefits package as our way of expressing appreciation to our employees. While these include traditional options, such as food vouchers and additional health insurance, we've also taken steps to address an often overlooked but crucial aspect – mental health and well-being. We provide our staff with access to psychological support services, recognizing the importance of mental wellness in the workplace. Our benefits package includes several other valuable offerings, such as:

Hybrid type of work	**Food vouchers**	**Transport funds**	**Car parking**
Mix of on-site attendance and home office	Electronic funds for meals	Additional funds for fuel/public transport services	Parking slots for Expert position and above
Additional heath insurance	**Sport cards on discount prices**	**Learning opportunities**	**Refer a friend program**
Additional medical support for employees/discount price for additional medical support for family members	Sport cards for employees and family members at discount prices	Access to learning platforms and certification options	Employees receive a bonus when referring a friend/relative to an open position
Discount program	**Drinks on the Town**	**One-time payment when having a baby**	
Employee discounts for selected vendors incl. health & beauty services, vehicle maintenance, household goods, etc.	Monthly social gatherings after work with refreshments provided	One-off payment for having a baby	

Additional day paid leave for employee's birthday	**Additional day paid leave for volunteering work**	**Additional 4 days paid leave**	**20 days paid sabbatical**
Additional day of paid leave during the month when an employee has their birthday	Additional day of paid leave when joining a Yettel-organized volunteering initiative	Additional days of paid leave when all vested paid leave days over the year are used	Recharge program - 20 days paid leave every five years of employment with the company to prevent burnout
Vouchers for mobile devices	**Mobile and data plans for employees**	**Additional funds for digital services**	**Discount fees for mobile plans & fixed services for family members**
Set amount provided by the company every two years. The amount of the vouchers is dependent on each employee's expertise	Unlimited mobile and data plans for employees	Additional funds for digital services linked to mobile and fixed services	Mobile plans and fixed services on discount prices
Car allowance	**Sport activities in the office**	**Corporate psychologist**	**Financial consultations**
Additional funds for Managers/Sr. Experts and above	Sport classes such as conditional training, yoga, Pilates & etc.	On demand consultations with certified psychologist	On demand financial consultations

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

Employees Characteristics (2024)

Employees working on Full-time contracts

Employees working on Part-time contracts

● Female ● Male

1,172   755

Total
1,927

10   9

Total
19

Employee distribution by contract type, 2024, Active Headcount	Male	Female	Total
Number of employees	764	1,182	1,946
Number of permanent employees	700	1,106	1,806
Number of temporary employees	64	77	141

Workers in the Value Chain

As a telecommunications company, we recognize that our operations and business relationships can have far-reaching implications. Our strategy and business model inherently connect us to potential impacts on workers throughout our value chain. This is particularly due to our reliance on electronic devices and components, which ties us directly to the global electronics supply chain. We acknowledge that these connections can significantly impact the interests, views and rights of workers at various stages of production and distribution.

Our **material risks** primarily relate to specific groups of value chain workers, particularly those in mineral extraction and electronics manufacturing in developing countries. We have identified three material impacts, linked to these risks, that could affect our value chain workers, particularly in relation to aspects such as working conditions, equal treatment and opportunities for all, and other work-related rights:

1. Potential absence or deficiencies in our supplier management program could lead to **human rights breaches** for employees of our suppliers.

2. Potential use of **child or forced labor** in developing countries for **mining minerals** and **materials needed to create electronics**, stemming from our connection to the global electronics supply chain.

3. Potential use of **child or forced labor** in developing countries **for the manufacture of electronics**, also arising from our reliance on electronic devices and components.

We have adapted our strategy and business model to address these potential impacts by:

1.

Implementing a **comprehensive supplier management program**, including our Supplier Code of Conduct introduced in 2023, which establishes high standards of social sustainability and business ethics throughout our supply chain.

2.

Developing and incorporating a local **Sustainable Sourcing Policy** in 2025, aiming to ensure all our suppliers meet social and governance standards.

3.

Conducting **rigorous integrity checks**, including an obligatory Integrity Due Diligence (IDD) assessment for our main suppliers, which adhere to certain criteria (e.g., total spend, supplier category, etc.). As part of Yettel's ESG supplier engagement efforts, we inquire suppliers on their adherence to different standards:

▸ Anti-corruption and anti-bribery;

▸ Environmental protection;

▸ Human rights and labour;

▸ Health and safety;

▸ Supply chain responsibility;

▸ Carbon footprint;

▸ Adherence to the e& PPF Telecom Group Supplier Code of Conduct.

4.

Creating a **comprehensive engagement plan** to have meaningful dialogues with key suppliers on crucial issues outlined as engagement results. Efforts in this domain include providing suppliers with additional know-how and advice on how to implement or update company practices in areas such as ethics, health and safety, human rights and labor, etc.

The relationship between these material risks and our strategy is fundamental. Effectively managing these risks presents opportunities to strengthen our brand reputation, enhance stakeholder trust and ensure a more resilient and ethical supply chain. All value chain workers, including those who are likely to be materially impacted by our operations, products, services and business relationships, are included in the scope of our disclosure under ESRS 2.

Policies

The **e& PPF Telecom Group's Supplier Code of Conduct** is a cornerstone of our commitment to respecting human rights, including labor rights, across our value chain. It serves as a key tool to prevent and mitigate negative impacts on this affected stakeholder group.

The Supplier Code of Conduct mandates compliance with all applicable labor and human rights laws, explicitly prohibiting practices such as human trafficking, forced labor, child labor, bonded labor, indentured labor and prison labor throughout our supply chain.

We also place high importance on gender equality, diversity and inclusion. Our suppliers are expected to provide equal opportunities and prohibit discrimination based on various factors including gender, race, disability and other protected characteristics. Additionally, we require our suppliers to treat all workers with respect and dignity, prohibiting any form of abuse, harassment or intimidation in the workplace.

Regarding wages, our Supplier Code of Conduct stipulates that suppliers must compensate their employees and staff with wages and benefits that, at a minimum, meet the requirements established by applicable laws and any relevant collective agreements. These principles are crucial to fostering a fair, safe and inclusive work environment throughout our supply chain.

We have aligned our policies regarding value chain workers with internationally recognized instruments, including the **UN Guiding Principles on Business and Human Rights**. Our Supplier Code of Conduct specifically references compliance with the **International Bill of Human Rights** and the **ILO Declaration on Fundamental Principles and Rights at Work**, underscoring our commitment to upholding these global standards in our operations and throughout our value chain.

In our commitment to maintaining high standards and legal compliance, we've developed a collaborative approach with our stakeholders, including our valued suppliers and B2B customers. One of our key initiatives is **ESG Connect,** a series of engaging events designed to foster networking and share best practices. These gatherings primarily cater to our B2B customers and partners, but we also warmly welcome our suppliers, who have made up about 10% of attendees. The in-person sessions provide a wealth of information, insights and practical recommendations on various relevant topics, creating a platform for open dialogue and continuous improvement across our value chain. So far, we've hosted three editions, exploring important themes such as the initial steps in developing a sustainability strategy, integrating ESG solutions into business operations and creating an inclusive environment that supports diversity and equity.

We have also established measures to provide and enable remedy for human rights impacts. Suppliers who fail to meet our ESG standards are required to implement **corrective action plans**. Additionally, we have set up an online form accessible to both internal and external stakeholders to **raise concerns or report violations of laws or of our Code of Ethics**.

In 2025, we implemented a comprehensive **Sustainable Sourcing Policy** that covers all our upstream suppliers, vendors and service providers. This policy is designed to manage our material impacts, risks and opportunities related to value chain workers, applying to all such workers.

Actions

Our approach to managing material negative impacts on value chain workers involves **continuous monitoring and engagement with suppliers** to ensure adherence to ethical practices. In 2024, we expanded these engagement efforts through **ESG Due Diligence**, using IntegrityNext - an online platform for the collection, analysis and management of supplier sustainability data.

In 2024, we welcomed the **first wave of key suppliers** to participate in the assessment. We invited 110 suppliers, half of which completed the survey, while seven of the suppliers surveyed were identified as high-risk following the assessment. To address these concerns, we have committed to providing training and recommendations to the suppliers categorized as high-risk by 2025.

Moreover, our procurement practices are adapted to favor transparency, ensuring that all suppliers align with the standards set in our Code of Conduct.

This is designed to prevent the potential negative impacts associated with business pressures while maintaining a balanced commitment to ethical sourcing.

Overall, our commitment to these actions and continuous evaluation of their effectiveness demonstrates our dedication to managing material impacts, ultimately fostering a more sustainable and ethical value chain.

Remediation and Reporting of Concerns

We are committed to fostering an open and transparent dialogue with all our external stakeholders, including workers throughout our value chain. To facilitate this, 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. These dedicated communication pathways ensure that every stakeholder has a direct communication channel with us, reinforcing our commitment to accessible and responsive governance. 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**.

Accelerating Technology for a Sustainable Future

Consumers and End-Users

At Yettel, we recognize our role and impact on consumers and end-users, with our services playing a crucial role in social inclusion, privacy, education, employment and political engagement. Our strategy focuses on expanding network coverage, ensuring data privacy and cybersecurity, promoting online safety (especially for children), providing transparent product information and complying with EMF (Electromagnetic Fields) safety standards. We have identified key at-risk groups, including those vulnerable to data breaches and children susceptible to online harms. While we create positive impacts through improved connectivity, digital skills training and online safety tools, we also acknowledge potential widespread risks and work diligently to mitigate them. We see opportunities in becoming a leader in customer care and secure service provision, striving to create a secure, inclusive and empowering digital environment while navigating the unique telecommunications challenges.

Customer Engagement

At Yettel Bulgaria, we have set up a variety of ways for customers to connect with us, making sure we are there for them at every step of their journey. Our extensive network includes physical stores nationwide, a 24/7 Call Center, and various digital platforms such as our mobile app, website and a dedicated business portal for B2B clients. These channels facilitate interactions at every stage of the customer lifecycle, from initial offerings and contracting to ongoing service use and support.

To ensure seamless coordination across these touchpoints, we have centralized all customer interaction functions under the leadership of our Chief Commercial Officer (CCO). The CCO oversees key departments including General Consumer Sales, Business Sales and Support, Digital Sales and Marketing, and Customer Centricity initiatives.

In addition to providing multiple channels of engagement, **we actively seek feedback** through daily satisfaction surveys covering various aspects of the customer experience, including network performance, roaming services and interactions with our digital and physical channels. These surveys are complemented by monthly online panel surveys with a nationally representative sample, allowing us to benchmark our performance against competitors and continuously improve our services. By consistently gathering and analysing feedback, and adapting our services accordingly, we strive to stay ahead in the market while ensuring that all our adult customers (aged 18 and over) receive comprehensive and accessible services tailored to their specific needs.

We also pay special attention to the needs of **potentially vulnerable customers**. For customers with hearing and visual impairments, we offer specially tailored tariffs and unique disability-based discounts across our service portfolio. In addition, our Policy for customers aged 65 and above is reviewed on a bi-monthly basis. These initiatives reflect our commitment to addressing the needs of all customer groups fairly and efficiently.

All of the above-mentioned methods for engagement with customers and end-users are outlined in our **Stakeholder Engagement Policy** and its Annexes, which we developed and implemented in 2025.

Responsible Marketing Practices

In 2025 we developed and implemented our **Responsible Marketing Policy** that makes sure our marketing is ethical, transparent and focused on our customers. This policy aligns with key standards and laws, including our Sustainability Strategy 2028. Through this policy we commit ourselves to being ethical, making sure what we say is true, clear and not misleading.

We are careful not to abuse vulnerable people and we strive to promote diversity. Being transparent is important to us, so we always aim to clearly explain our terms, conditions and prices in ways that are easy to understand. We take data protection seriously too, following GDPR and other laws. We promote sustainable products through our marketing practices and try to reduce the environmental impact of our marketing materials. We value the input of our customers and regularly communicate with them and with advocacy groups to make sure our marketing meets customer expectations.

Yettel is a telecom brand of choice for those who love technology and we see it as our mission to help our customers maximize the potential of the products and services which they use. **We act as partners in the digital world** and we aim to put people and their needs first. This philosophy is reflected in our product propositions, as well as in our communication. Our goal in our marketing campaigns is to remain close to our consumers, engaging with topics that matter to people of all ages, genders and backgrounds.

Tackling the Digital Divide: Reliable Connections and Digital Education for All

In today's interconnected world, closing the digital divide is crucial for ensuring equal opportunities and social inclusion. We recognize how important it is for everyone to have reliable Internet access. Our commitment to tackling the digital divide is reflected in our comprehensive strategy to enhance and expand our networks, with a focus on reaching even the most remote areas and providing innovative solutions for vulnerable customers.

5G

OUR GOAL:

Make 5G connectivity available to 85% of the Bulgarian population by the end of 2026.
We aim for our 5G network to deliver connectivity speed above 1Gbps.

Actions

Network Coverage

Yettel and CETIN initiated the deployment of their 5G network in Bulgaria during the second quarter of 2021, aiming to provide 5G connectivity to 85% of the country's population by end of 2026. Significant progress has been made with CETIN maintaining 3,250 base stations in total, of which 1,400 are 5G base stations. The majority of our 5G stations operate on the C-band frequency. Our 5G base stations and C-band frequency base stations have successfully provided coverage for over 80% of the population, offering mobile broadband service with impressive download speeds reaching up to 1.6 Gbps.

The majority of the 5G stations utilize C-band frequency, showcasing the network's advanced capabilities. To address the digital divide and ensure comprehensive connectivity, efforts are underway to extend 5G coverage to major roads, rural areas and indoor locations. This strategic approach aims to provide reliable connectivity across diverse environments.

Beyond mobile broadband, the 5G network serves as a foundation for additional services. It supports fixed wireless access (FWA) and television services, offering customers uncapped, high-speed data access with speeds of up to 300 Mbps. This multifaceted approach demonstrates the versatility and potential of the 5G infrastructure in meeting various connectivity needs.

		4G and above		5G	
Total network coverage		% of population covered	geographic coverage	% of population covered	geographic coverage
	2023	**99.67%**	**90.10%**	**71.36%**	**23.38%**
	2024	**99.74%**	**90.92%**	**81.75%**	**42.77%**

Best in Test

We are proud to share that our efforts in the realm of providing reliable connections for all have once again been recognized. For the 8th year in a row, Yettel's network has been awarded the Best in Test certificate in Bulgaria at the start of 2025. This recognition comes from **umlaut**, an independent benchmarking organization, which has deemed Yettel the most reliable network in the country. With an impressive **score of 958 out of 1,000 points** – which is a remarkable increase from our 2024 score – Yettel outperformed the other mobile operators in Bulgaria.

We excelled in four crucial subcategories: **stability, latency and broadband coverage**. This outstanding performance not only places Yettel at the top in Bulgaria but also positions our network among the highest-rated globally and in Europe.

The assessment highlighted that **Yettel's customers** benefited from extensive coverage and were **primarily served by advanced 4G or 5G technologies**.

## Promoting Digital Education and Safe Online Practices

The growing influence of technology in education and daily life has made digital literacy among Bulgarian youth an increasingly critical issue. A lack of digital skills in the younger generation can lead to significant disparities in educational opportunities and future career prospects. However, digital literacy extends beyond mere educational concerns.

Without proper education on digital awareness, young people and children face heightened exposure to potentially harmful online content and practices. They are also more vulnerable to cyberbullying and various online scams. The increased time children spend online in recent years has only amplified these risks.

The **annual survey** we conduct on this topic – **"Digital Lives of Children and Their Parents"** in Bulgaria, revealed alarming results.

Nine out of ten children and adolescents (ages 7-19) have a social media profile, with 75% creating one before turning 12, and 5% as early as before age 7. Moreover, 12% of children and 23% of teenagers are victims of online bullying - most often in the form of insults and mockery, as well as sharing content without consent. These findings underscore the urgent need for enhanced awareness about digital safety among both children and their parents.

Recognizing the gravity of this issue, we have dedicated significant resources to promoting online safety and digital education. Our campaigns and projects focus on **raising awareness and improving digital literacy**, equipping young people with essential skills to navigate the digital world safely and effectively while mitigating risks from increased online engagement. In that regard, we've also set a measurable target:
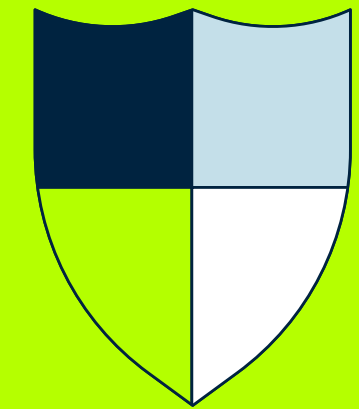
OUR GOAL:
Engage 40,000 children on online safety and equip 10,000 people with digital skills every year.

In 2024, we continued to build upon and expand our long-standing initiatives aimed at promoting digital literacy and online safety. Through our **"Online Safety and Digital Skills Development" program**, a cornerstone of Yettel's community engagement, we provided **online safety education to over 58,000 children** and young people while **enhancing digital skills for nearly 24,000 individuals**.

In partnership with **Safer Internet Center** and **Klett Bulgaria Publishing House** we developed free lessons on the iZZI platform covering essential topics like online communication etiquette and cyberbullying prevention, with new materials tailored for 5th to 7th graders. Additionally, we continued to support the **Digital Skills Academy on prepodavame.bg**, involving over 4,300 teachers in **webinars and courses on AI-enhanced classroom technology**, while also benefiting more than 16,800 children with insights into new technologies and AI-based content creation tools.

Our flagship **"Digital Scouts"** initiative leveraged gamification, partnering with beloved content creators who developed **fun yet educational challenges for young audiences**. This innovative approach effectively taught internet safety and cultivated positive digital habits. In our second edition, we transformed popular influencers into **comic book heroes**, bringing responsible online behavior to life through relatable narratives. These illustrated stories addressed crucial topics including **phishing scams**, **inappropriate content**, **data protection** and **gaming culture**, making complex safety concepts accessible. Across both editions, we successfully empowered nearly 32,000 children as digital scouts, equipping them with essential skills for the virtual world.

Digital Parenting

In 2024, Yettel expanded its Digital Safety program with the **"Digital Parenting" campaign** that focuses on supporting parents in navigating digital challenges with their children. This initiative features events and valuable content addressing children's internet consumption and online risks. We organized **meetings across several cities**, reaching over 700 parents in collaboration with the Safer Internet Center. These sessions provided practical guidance on building healthy online habits and conscious digital behavior in children, while experts emphasized strong parent-child communication and trust-building for enhanced online safety.

We also reached out to parents through content series on traditional media, plus a **Digital Literacy Dictionary**, offering useful tips and techniques for effective online guidance.

Digital Literacy Dictionary

Yettel. | safenet.bg

А Б В

Skills of the Future

A

Antivirus programs

In 2024, Yettel's program "Online Safety and Digital Skills Development" achieved the following results:

Engaged **58,226 children** on the topic of online safety topic

Enhanced digital skills of **24,524 individuals**

Mobile Telecommunication Technologies and Public Health

As mobile technology continues to grow and change, it is natural that people also raise questions about how it affects the public health. At Yettel, we take those concerns seriously. That's why we stick to strict international safety standards, keep things clear and open with our customers, and constantly look for new ways to make sure our innovations support both strong connections and well-being.

Actions

In our commitment to customer health and safety, we recognize that **Electromagnetic Fields (EMF)** from our mobile telecommunication technologies are a primary concern. We take this seriously and have thoroughly investigated the matter. Studies show that EMF from mobile technology does not pose health hazards when emissions remain below certain levels. These safe levels are defined by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), an independent advisory body collaborating with the World Health Organization (WHO).

We ensure that **all our base stations and mobile devices comply with ICNIRP guidelines**, which incorporate substantial safety margins for everyone's protection. This includes our new 5G devices, radio masts and small cells. Our rigorous compliance extends to all equipment we deploy and sell.

To maintain these standards, we implement a two-level control process for our infrastructure:

1. Before constructing any transceiver station, we implement a **preventive control process** at the design stage. This initial phase involves collaborating with local authorities to secure their approval for the project. Simultaneously, we undergo a **preliminary sanitary assessment** conducted by the Ministry of Health. This evaluation ensures that the planned parameters of the base station comply with regulatory requirements. Both the local authority approval and the Ministry of Health's sanitary clearance are essential prerequisites for obtaining authorization to proceed with the base station construction. This proactive approach helps us address potential issues early in the process and ensures compliance with all necessary regulations from the outset.

2. Once the station construction is finished, we initiate the **second level of control**, which is crucial for commissioning. This phase involves conducting **on-site measurements of electromagnetic radiation** at the newly built base station. The results of these measurements are documented in an EMF (Electromagnetic Field) protocol. If the measurements confirm that the radiation levels comply with regulatory standards and show no deviations, we proceed with putting the infrastructure into operation. This step ensures that the base station not only meets design specifications but also adheres to safety regulations in its actual operational environment before being activated for service.

We also **ensure that all mobile devices we offer undergo strict compliance tests before market launch**. Through these measures, we successfully mitigate potential negative impacts on our customers' health. In 2024, we maintained full compliance with all local and EU regulations regarding our products and services, reinforcing our commitment to customer safety. Mobile devices sold in our market are subject to rigorous health and safety standards set by national and EU regulations. Before any phone is introduced to consumers, manufacturers and importers must conduct comprehensive tests to ensure compliance with all EU directive requirements and limits.

While we currently don't perform additional assessments to enhance the health and safety impacts of our products and services, we maintain strict control over them.

It's worth noting that throughout 2024, we maintained a perfect compliance record, with no instances of non-compliance regarding our products and services in relation to local or EU regulations. This underscores our commitment to maintaining high standards of safety and regulatory adherence in our offerings and compliance with all local and EU regulations regarding our products and services, reinforcing our commitment to customer safety.

Incidents of non-compliance concerning the health and safety impacts of products and services for the reporting period: **0**

Smart Solutions that Benefit People and the Environment

At Yettel, we are excited to be at the heart of the rapidly evolving digital landscape. We are not just keeping up with the times - we are actively shaping the future through our cutting-edge solutions and sustainability-focused services. Through our initiatives we are embracing digital transformation and using innovation to bring value to our customers, stakeholders and the wider community.

Actions

In 2024 we continued to build upon and refine several innovative initiatives launched in previous years, aimed at enhancing various sectors and promoting sustainability. The **Smart Fleet Management** solution continues to provide real-time visualization of essential fleet data for the public transport sector, optimizing routes and reducing fuel consumption. For the second year in a row the **IoT Cold Chain Monitoring** service utilizes sensors to monitor temperature-sensitive environments, promoting responsible resource management and product safety in the supply chain. The digital tourism initiative, a collaboration with the Bulgarian Tourist Union, which digitized the **"Explore Bulgaria – 100 National Tourist Sites"** movement through the Yettel mobile app in 2023, offers free access to digital stamps, site profiles and multimedia content for various landmarks, with continued enhancements based on user feedback throughout 2024. We have also kept up our ongoing initiatives to reduce our environmental impact, including the use of eco-friendly receipt paper and offering electronic signature options for existing business clients, thanks to which over 40% of their documents are now signed electronically via Yettel's eSign platform.

When it comes to driving digital innovation and bringing our customers the latest and greatest in products and services, our Sustainability Strategy 2028 supports us in making a positive impact. Through this strategy we have set ourselves the following target:

Introduce 1 new solution every year, supporting businesses and society in Bulgaria towards sustainability.

It is our way of ensuring that as we grow and innovate, we are also contributing to a greener, more sustainable Bulgaria. In 2024, we expanded our portfolio and exceeded our annual goal by introducing **two new services** that support sustainability efforts in Bulgaria. These new solutions are designed to help businesses optimize their operations and reduce their environmental impact and prevent e-waste through improved lifecycle management of electronic devices. Our new offerings demonstrate our responsiveness to evolving market needs and our proactive approach to digital transformation.

smartphone diagnostic

Smartphone Diagnostic

Our newly introduced innovative Smartphone Diagnostic service is designed to assist Yettel app users in **maintaining their devices in optimal condition and extending their lifespan**. Smartphone Diagnostic conducts a series of tests on both software and hardware components of smartphones and tablets (incl. audio systems, cameras, display functionality, software status, sensors and physical buttons), providing users with a detailed assessment of their device's overall health and performance.

By enabling early detection of potential issues, we help Yettel app users to prevent minor problems from escalating into major defects, potentially reducing repair costs and extending the device's usable life. This proactive approach to device maintenance promotes sustainable consumption by significantly reducing electronic waste. Our efforts contribute to keeping devices functional for longer periods, which in turn decreases the frequency of replacements and helps minimize the overall environmental impact of electronic products.

SD-WAN

In 2024, Yettel and CETIN introduced a cutting-edge Software-Defined Wide Area Network (SD-WAN) service for businesses, using Fortinet technology. Our innovative solution allows companies to optimize their network resources by utilizing a combination of connectivity options, including Multiprotocol Label Switching (MPLS), LTE/4G, 5G, and broadband Internet services. SD-WAN allows for the connection of various company locations into a single infrastructure, enabling efficient traffic routing and supporting multiple connectivity points. SD-WAN offers numerous benefits for businesses, including:

SD-WAN

Increased flexibility
Network reliability
Efficiency in network operations

We offer **centralized management and real-time network monitoring**, enabling easy scalability and quick expansion. Security is prioritized through Internet Protocol Security (IPSec) encrypted tunnels and Fortinet's Next-Generation Firewall NGFW devices. SD-WAN thus optimizes costs by consolidating network products and improving infrastructure control. This service supports digital transformation with significant ESG benefits, reducing hardware and energy consumption while enhancing user experience and productivity. It strengthens business governance through centralized management and enhanced security measures. Additionally, the solution reduces operational expenses and supports business continuity through primary and backup connectivity options.

In order to develop new solutions, Yettel employs various methods including proof of concepts, attitude surveys and regular feedback from salespeople who interact with customers on a daily basis. Customer satisfaction data is analyzed to measure key performance indicators (KPIs) including brand preference, brand satisfaction and NPS. These metrics help understand Yettel's market position and consumer perception. Additionally, we employ diagnostics as a service for our general consumer base, providing valuable insights into their experiences and needs.

To drive improvements, Yettel monitors service usage and explores new applications and complementary functionalities. For example, **based on customer feedback, we decided to expand the scope of the Smart Accounts service with Smart CRM and Smart Drive**. Another example is our **video surveillance** service which we developed further to cover various other applications – such as **surveillance of sports facilities**, **cold storage rooms**, **etc**.

Yettel's structured approach to developing smart solutions involves preliminary research, analysis, execution and market launch, with cross-departmental collaboration (Sales, Marketing, Technical, Financial, PR, Procurement, Legal). Each new solution requires a business case to assess market potential, distribution and financial impact, focusing on increasing customers, revenue and profit. Effectiveness is measured by sales, activations, KPI achievement and feedback from our sales teams and bi-annual surveys.

Safeguarding Personal Data

At Yettel, we're committed to protecting our customers' data and privacy in today's digital world, seeing it as the foundation of our customer relationships. Our approach to data protection isn't just about ticking boxes, it's a comprehensive strategy that we've woven into every aspect of our operations. Through our carefully chosen actions and robust security measures, we are committed to creating a digital environment where our stakeholders can feel safe and confident.

Policies

We have implemented a comprehensive **Data Protection Program** aligned with the General Data Protection Regulation (GDPR) - Regulation (EU) 2016/679. Our program safeguards the processing and free movement of personal data. We have developed internal manuals that carefully address privacy considerations for handling personal data of our customers, job applicants, employees, contractors and visitors. These manuals cover key areas like privacy notices, consent management, data subject rights and complaint handling. To enhance data protection, we have adopted strong policies and implemented advanced security measures, including encryption, anonymization and pseudonymization for data in transit and at rest.

Our **Information Security and Privacy Policy** is central to data privacy and protection efforts. The policy ensures thorough risk identification and management, protects the integrity and confidentiality of our assets and information, maintains business continuity and adheres to all relevant legal requirements for personal data protection.

Our Executive Leadership Team (ELT) is fully committed to this policy. We address all information security and privacy management issues and are dedicated to identifying and controlling risks, maintaining information integrity and availability, protecting against unauthorized access and ensuring confidentiality. We have established clear risk assessment criteria, including acceptable risk levels and evaluations of potential threats to our assets and personal data.

We are committed to developing and implementing procedures supporting our policy. This includes **allocating necessary resources** and conducting **employee training** on information security and privacy management. We thoroughly investigate all breaches, with direct reporting to our Security Director and Data Protection Officer. We have also created and maintain robust **Business Continuity and Disaster Recovery Plans** for our IT and network operations.

Our **ISO 27701 certification** further demonstrates our commitment to data protection. This certification extends **ISO 27001 and ISO 27002 standards** to include privacy information management, showcasing our adherence to international best practices. It provides us with a framework for managing customer and employee personal information, enhancing our existing **Information Security Management System**.

Additionally, our **Local Security Policy** outlines further data protection and security measures. We focus on developing and maintaining controls that align with industry best practices and legal requirements. We have implemented a comprehensive security risk management process to address risks to our assets, business processes and third parties, including fraud prevention.

Finally, our commitment to privacy is reflected in our **Local Ethics and Compliance Policy**, which recognizes the privacy rights of employees and customers when raising concerns. Our investigations consider privacy in line with our **Code of Ethics** and relevant documents. We ensure minimal intrusion on individual privacy and conduct thorough assessments when conflicts arise between our interests and individual privacy.
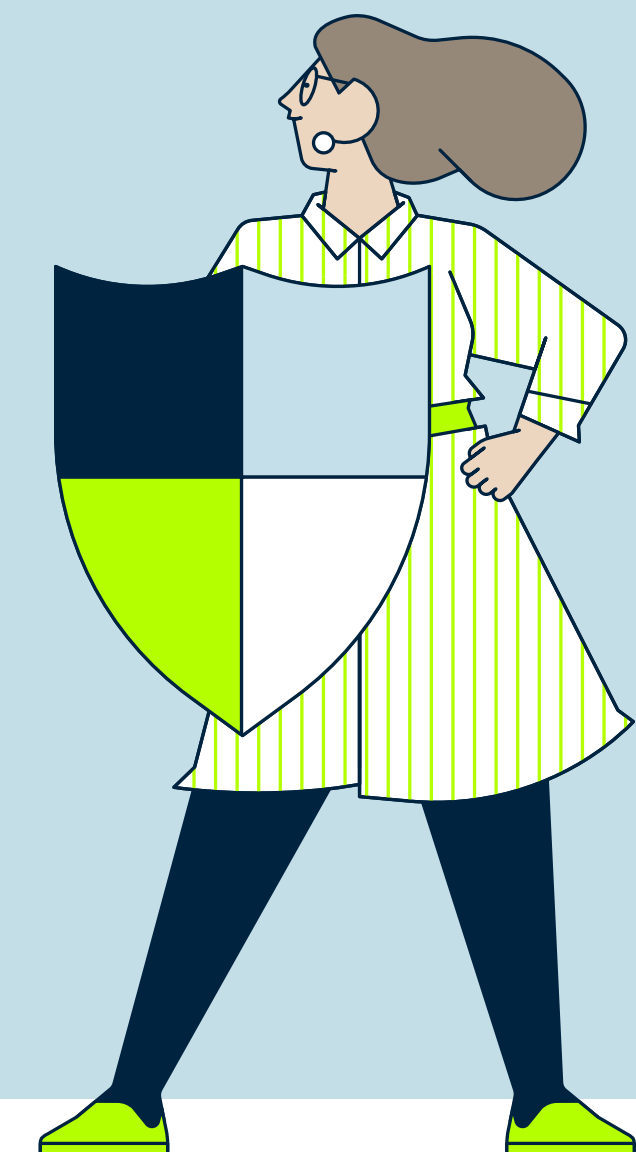
Actions

Yettel's Risk Management System has categorized data privacy as a significant threat, placing it in the high-impact area of our risk matrix. We therefore **maintain diligent documentation of data processing operations** through detailed logs, decision-making records and various assessments. This approach ensures easy and reliable traceability of all our activities. As a provider of publicly available electronic communication services, we **adhere to strict data retention laws beyond GDPR requirements**. Our carefully crafted retention schedule defines the lifespan of processed personal data, after which we either destroy or anonymize it.

Before making any changes to our data processing activities, we thoroughly evaluate their necessity. This helps us **minimize excessive data collection**, maintain the intended purpose of data usage and avoid handling inaccurate or outdated information.

To prevent data breaches and improve information security, we continuously **evaluate and implement technical and organizational measures** to protect employee and customer privacy, guided by a risk-based approach. These measures include enhanced identity verification processes, ad-hoc notifications for significant events, additional authentication for sensitive transactions, strict disciplinary actions for policy violations and ongoing monitoring of potential threats.

We track the effectiveness of our actions through a robust system of internal controls and independent assessments. As part of an ongoing surveillance and a 3-year recertification cycle, we undergo **regular internal and external audits** conducted by independent auditors. These include annual surveillance audits and certification reviews, which ensure that our policies, procedures and practices are consistently implemented and aligned with applicable standards. The audits provide objective evaluations of our performance and enable us to identify areas for improvement, ensuring the continuous effectiveness of our management systems.

We are committed to empowering our team with the knowledge and skills needed to uphold our data protection standards. In 2023 we introduced six new **comprehensive online training modules**:

Data Protection Fundamentals	Managing Privacy Consents
Privacy in HR and Recruitment	Cross-border Data Transfers
Vendor Management and Privacy	Data Breach Response Protocols

In 2024, we built up on that by launching trainings on three new topics:

Acceptable Use of Corporate Assets & Information	Cookies & Related Technologies	Profiling & Automated Decision-Making

These tailored courses provide our team with practical knowledge on various privacy aspects. In 2024, **our employees spent 1,001 hours on these courses**, demonstrating our collective commitment to continual learning and improvement. The substantial time our employees dedicate to these trainings reflects our shared commitment to continuous improvement. We also maintain readily accessible **privacy resources for all staff**, reinforcing our dedication to safeguarding customer information across every level of Yettel.

In **2024, we discovered one reportable personal data breach**, which we promptly reported to the Data Protection Commission and affected individuals. Following our thorough response and mitigation efforts, **the incident was ultimately classified as low severity by the Data Protection Commission**.

We also recognize the vital importance of **privacy compliance throughout our supply chain**. To address this, we have significantly enhanced our efforts in this area. **In 2024, our team conducted 84 vendor assessments**. Through this rigorous due diligence process, we ensure that our vendors and partners uphold the same high standards of data protection and privacy that we ourselves adhere to. This approach allows us to maintain the integrity of our privacy practices across our entire business ecosystem.

Tracking and evaluating the effectiveness of these actions and initiatives are part of Yettel Bulgaria's privacy management system, which is certified according to ISO 27701. In addition, we undergo annual audits (both internal and external), and in 2024 we also underwent recertification audits.

In order to maintain our ongoing efforts and commitments in the realm of data protection, Yettel Bulgaria has a **Data Privacy Protection Department** that deals with this. There are several committees (under ISO 27001, ISO 27701) for handling complaints and cases related to personal data.

Targets

Our approach is rooted in the understanding of the sensitive nature of personal data and the trust our customers, employees and partners place in us to protect their information. To uphold these standards, we have a set of data privacy targets, which we adhere to. Some of the themes covered by our data protection and privacy targets include:

- Obligations related to sharing, transfer and disclosure of PII (personally identifiable information)

- Internal organization and establishment of frameworks and processes

- Compliance with legal and contractual requirements

- Ensuring employee compliance with privacy-related responsibilities
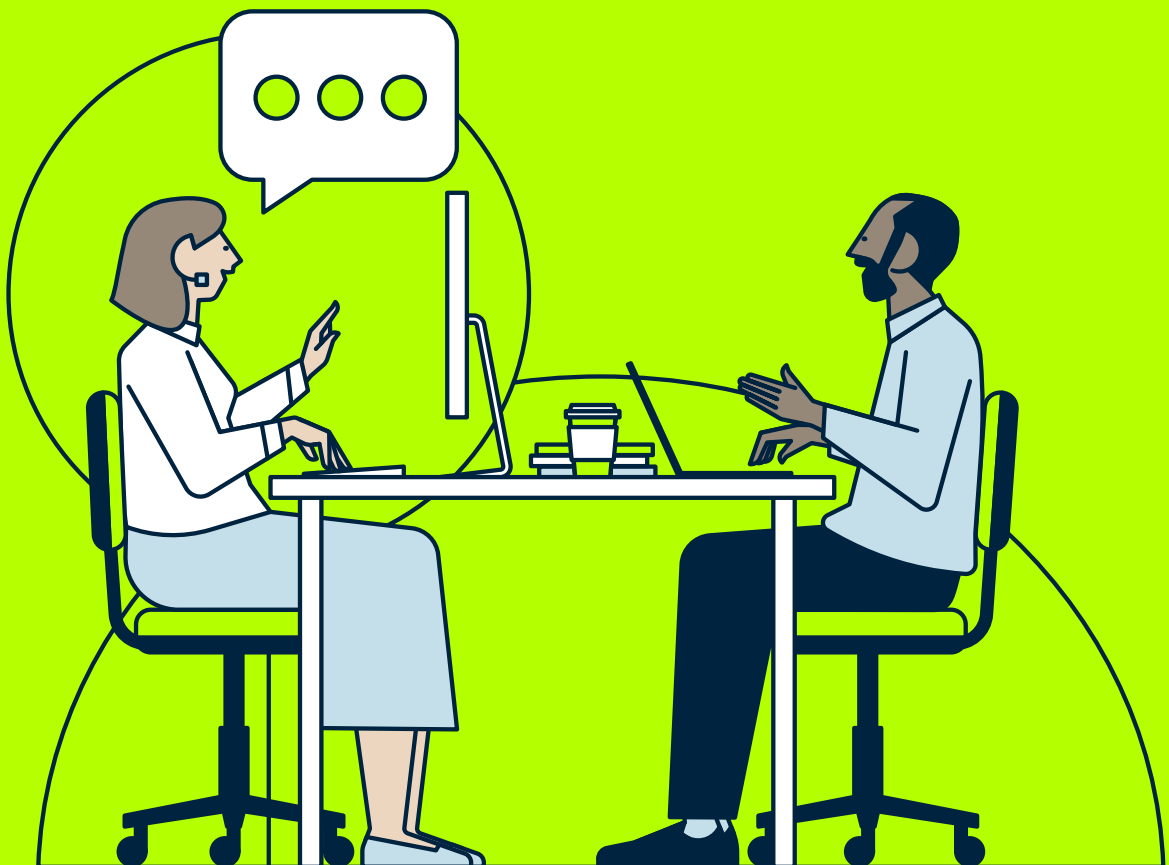
Remediation and Reporting of Concerns

We have established an efficient reporting system to address customer concerns about data privacy and other issues. Customers have access to **multiple channels to report problems or ask questions**, including our customer service center, social media platforms, email, website contact forms, phone calls to our service center and in-person complaints at our stores.

To ensure we handle customer feedback quickly and effectively, we have set reasonable time limits for responding to different types of communication.

To keep track of all reported issues, each one is assigned a unique identification number. We also have our special Customer Experience Team that deals with complex customer problems. This team aims to solve these issues within one to two days.

When it comes to protecting customer data, we have a clear process for reporting concerns. Any worries about data protection are sent to our Data Protection Team and Data Protection Officer. These experts then report to a senior leader within Yettel, who can bring important issues to the attention of our CEO if needed. Customers can also contact our Data Protection Officer directly through our customer service center or dedicated email address for quick help with data privacy matters.

We take all privacy complaints seriously and always try to improve our practices. To better understand and address customer concerns, we regularly conduct surveys and track customer satisfaction. This approach helps us stay responsive to our customers' needs and maintain high standards in protecting data and providing excellent customer service.

In 2024, we received a **total of 145 substantiated complaints regarding breaches of customer privacy**, the same as in 2023. Of these, 112 were filed by external parties, 12 were reported by regulatory bodies, and the remaining 21 were recorded through our internal channels.

When assessing the effectiveness of our channels for submitting complaints and signals related to personal data, we focus on key performance indicators that provide valuable insights. These include metrics related to privacy customer complaints and their resolution. By monitoring these areas, we aim to ensure that our responses to customer concerns are timely and satisfactory, reducing the need for escalation to external regulatory bodies.

Reporting channels for personal data concerns are enabled through the provision of contact information for Yettel Bulgaria's Data Privacy Officer, which is available in all our policies published on Yettel's external website. The website also has a contact form where complaints and reports related to personal data can be submitted – this is also one of the main channels through which such complaints are received (in addition to reports submitted in the store network).

Entity-Specific Topic: **Cybersecurity**

At Yettel, cybersecurity is a top priority to keep our systems and services secure and resilient. Our recent double materiality assessment highlighted that inadequate data security could potentially disrupt operations and service delivery, posing a risk to critical infrastructure and affecting significant portions of the country.

We recognize the potential implications of cybersecurity lapses, including financial liabilities, reputational harm and the erosion of trust with our customers. Conversely, robust cybersecurity measures provide a key opportunity to enhance trust and loyalty among our customer base.

In response to these identified risks and opportunities, Yettel is taking proactive steps to strengthen our cybersecurity framework. By doing so, we aim to not only safeguard our operations and infrastructure but also build stronger, trust-based relationships with our customers.

Cybersecurity governance within Yettel is structured to ensure robust oversight and accountability. The Security Officer as a management body representative and Security and Privacy Committee (SPC) chaired by the Information Security Manager oversee cybersecurity matters and conducts regular meetings to evaluate risks and implement necessary actions.

The management review of the Information Security Management System (ISMS) is conducted in accordance with established procedures, addressing all key agenda items, including follow-up actions from previous reviews and changes in relevant external and internal factors. The review evaluates ISMS performance through the analysis of non-conformities, the status of corrective actions, audit results (internal, external and supplier-related) and the achievement of information security objectives. It also incorporates feedback from interested parties, reviews risk assessment outcomes and monitors the progress of risk treatment plans. Opportunities for continual improvement are identified, including the adoption of new technologies, procedures and industry best practices to further enhance the ISMS.

Policies

In 2024 Yettel has implemented **comprehensive cybersecurity policies** aimed at addressing the identified impacts, risks and opportunities associated with safeguarding our digital infrastructure. We introduced a comprehensive **Information Security Policy** and we are currently working on improving it by adopting a hierarchy structure towards it.

This policy defines how the ISMS is established, managed, measured, reported and continually improved within Yettel. It defines the security principles and objectives, sets the security controls baselines, both general and topic-specific, describes the adopted security ICT standards and the practices and processes followed.

All documents and records, data processing facilities, hardware, networks, information systems, software applications and databases that contain and process valuable information and have a direct or indirect impact on products and services delivery to Yettel customers are in the scope of the ISMS.

To effectively manage the identified impacts such as operational disruptions, data breaches, and infrastructure risks, our policy outlines technological, organizational, people and physical security measures. In mitigating risks like legal liabilities and reputational damage, it incorporates specific cybersecurity strategies such as regular vulnerability assessments, incident response protocols and compliance with network and information security, and data protection regulations. Furthermore, our approach leverages the opportunity to enhance trust and loyalty among our customer base through measures like transparency, timely breach notifications, customer education on security best practices and demonstrating a strong commitment to data privacy.

Actions

In response to the identified impacts, risks and opportunities within the realm of cybersecurity, and based on our set priorities, Yettel has initiated a series of strategic actions and initiatives. These efforts are aimed at fortifying our digital security framework and ensuring robust protection for all stakeholders.

Our commitment to adhering to stringent guidelines and best practices is demonstrated by several key certifications, such as:

IT Service Management System, certified as per ISO/IEC 20000-1:2018	Information Security Management System, certified as per ISO/IEC 27001:2013	Privacy Information Management System, certified as per ISO/IEC 27701:2019

These certifications underscore our adherence to leading practices and our unwavering focus on maintaining high security standards.

Our **Information Security Management System** not only aligns with ISO 27002 but also encompasses all technological domains, providing comprehensive policies and technical controls. A critical component within this system is the **Local Security Manual**, which stipulates specific requirements for supplier management. This includes organizing remote access, setting organizational and technical security prerequisites, and ensuring compliance with our overarching supplier management policy.

All contractual engagements mandate the evaluation of applicable security measures and obligations. This includes adherence to international standards, such as ISO/IEC 27001 or similar, with the option for third-party validation. Furthermore, we reserve the right to perform or require security audits, conduct regular security tests and receive updates on vulnerability scan results.

Providers are obligated to monitor security and report findings regularly, facilitating thorough security oversight by Yettel and our partners. Consistent business continuity requirements are upheld in alignment with our strategic plans, where relevant.

Additionally, we are actively engaged in further initiatives and actions, including implementation of a centralized identity management (IDM) system, security orchestration and automation and response (SOAR) technology, which are instrumental in advancing our cybersecurity objectives.

Metrics

At Yettel, we have established a set of relevant metrics to track the effectiveness of our cybersecurity actions. These metrics are crucial for assessing our strategies in maintaining a secure digital environment. Our key metrics include:

Overall effectiveness level of ISMS – a 10 domain / 50+ components metric demonstrating the overall performance of the Information Security Management System. It includes sub-metrics in organizational practices and capabilities, people security, remote access and user endpoint management, access control, acceptable use, asset management and physical security, operational procedures, network security, supplier relationship management, incident management, business continuity and compliance

Information security incidents management – a metric comprised of:
• Rate of registration of security incidents and events according to the approved rules
• Rate of reported incidents that are solved and closed within the Recovery Time Objective (RTO)
• Incidents which are not resolved within the RTO

Level of compliance - a multicomponent metric comprised of:
• Avoidance of breaches of legal, statutory, regulatory or contractual obligations related to information security
• Conducting at least one internal compliance evaluation of the ISMS for the revised period
• Compliance with **Acceptable Use of Corporate Information Assets and Resources** (for the period under review)
• Compliance with the **Code of Ethics and Business Conduct** (for the period under review)

To ensure accountability and drive enhancements, these metrics are regularly reviewed by the Information Security Department and presented to the Security and Privacy Committee. **Reviews occur on a yearly basis**, allowing for evaluations and adjustments to our security measures and practices.

This systematic approach to tracking and reviewing metrics reinforces our commitment to cybersecurity excellence, enabling Yettel to respond swiftly to challenges and capitalize on opportunities.

Targets

As part of our ongoing commitment to enhancing cybersecurity, Yettel has set ambitious targets that align with our strategic actions and metrics. These targets are designed to guide our efforts and provide benchmarks for success in safeguarding our digital infrastructure.

Our targets focus on achieving above satisfactory level in the key metrics:

Overall effectiveness **level of ISMS**: 85%+ score for the period under review, measured as the average of the averages of the included domains of metrics

Information security incidents management: 85%+ score for the period under review, measured as average of the included sub-metrics

Level of compliance: 85%+ score for the period under review, measured as average of the sub-metrics included

By setting time-bound measurable targets, we create a clear, goal-oriented approach that enhances accountability and drives improvement.

To ensure these targets translate into effective actions, they are **closely integrated with our comprehensive policies and regularly reviewed** alongside our metrics by the Information Security Division management and the Security and Privacy Committee.

In 2024, our ISMS demonstrated strong performance across key areas. The overall **effectiveness of our ISMS stands at 86.1%**, while our **information security incident management processes achieved a score of 86.7%**. Perhaps most notably, we have achieved **100% compliance with relevant standards and regulations**, with no non-conformities reported, underscoring our dedication to upholding the highest levels of information security practices.

Acting with Integrity and Transparency

Business Conduct

At Yettel, we recognize that responsible business conduct is fundamental to our long-term success and sustainability. Our approach to business conduct is shaped by a thorough assessment of our material impacts, risks and opportunities across our operations and value chain. This process considers various factors including our geographical locations, business activities, industry sector and the structure of our transactions.

We understand that a company culture that prioritizes ethics and transparency not only mitigates risks but also creates significant opportunities. By fostering a positive corporate culture, we aim to enhance employee morale, reduce turnover and create a work environment that attracts and retains top talent. Our commitment to ethical practices and transparent governance strengthens our market competitiveness, attracts investors and reduces legal and reputational risks.

We are also acutely aware of the potential negative impacts of poor business conduct. These range from creating a toxic work environment to making unethical decisions that could harm our stakeholders. To address these risks, we have implemented robust policies and procedures, including strong whistleblower protections, ethical supplier management practices (Supplier Code of Conduct) and stringent anti-bribery and corruption measures.

In the following sections, we will detail our policies, procedures and performance related to business conduct, demonstrating our commitment to operating with integrity and transparency in all aspects of our business.

Prevention and Detection of Corruption and Bribery

At Yettel, we place a high value on ethical conduct and integrity – it is why we are committed to preventing and detecting corruption and bribery in all aspects of our operations. Our comprehensive **Ethics and Compliance Policy**, anchored by our **Code of Ethics**, approved by our Board of Directors, guides how we work and serves as the foundation for interpreting all other internal regulations within Yettel and the e& PPF Telecom Group. This Code applies to all of us at Yettel, encouraging honest behavior and emphasizing zero tolerance for bribery and corrupt practices in our daily tasks.

Certain functions, such as Business Sales and Sourcing (Procurement), along with related business activities, are generally considered to carry a higher risk of fraud or corruption based on their nature. Therefore, to protect ourselves and ensure fair business practices, we've implemented several measures:

We carefully screen potential business partners in these high-risk categories through our **Integrity Due Diligence (IDD)** process before signing contracts, looking for signs of corruption, money laundering or links to organized crime.

Additionally, in 2024, we began preparing a **Sustainable Sourcing Policy** to be applied to our business partners in 2025, which will help ensure our suppliers meet our standards, including their anti-bribery and anti-corruption practices.

In relation to functions-at-risk covered by **training programs**, in 2024 we covered 50% of the at-risk functions by organizing a dedicated training held with the B2B Sales Management team. The specialized training for the Sourcing (Procurement) team took place in 2023.

We take compliance incidents seriously and have clear steps for internal investigations. Our **Ethics & Compliance Officer**, who operates independently from the management involved in any issues, leads these investigations to ensure fairness and objectivity. They **keep our CEO and e& PPF Chief Legal and Compliance Officer informed about significant compliance matters** and provide regular updates on our **Corporate Compliance Program**. To ensure everyone understands our commitment to ethics, we make our **Code of Ethics easily accessible to all employees** through our local intranet and other internal channels, in Bulgarian and English.

Our Executive Leadership Team (ELT) works hard to promote ethical awareness and create a culture of integrity in our company. To support this, we have put in place a robust **Ethics and Compliance Training Manual** that helps our team continuously grow in their understanding of ethical and compliance issues. We've tasked our Ethics & Compliance Officer with maintaining a catalog of trainings, determining the topics and target groups for necessary trainings, and monitoring the status of current and completed trainings. We use a web platform to assign trainings to team members and we rely on our line managers to ensure their teams complete the learning sessions on time.

We work closely with our Corporate Communications Division to **spread the word about trainings across our internal channels**. In 2024, we conducted **27 in-person training** sessions aimed at increasing awareness in the company about our anti-corruption policies and procedures.

Our **Ethics and Compliance Training Policy** covers a wide range of compliance areas, including anti-corruption, and it applies to everyone at Yettel, no matter their role or where they work. To keep us on track and always improving, our Ethics & Compliance Officer gives our CEO a yearly report. This report sums up our training activities, how many people completed them and suggests updates or new training we might need.

Thanks to all our efforts on anti-corruption and bribery practices, we are pleased to report that in 2024, **our Compliance Team didn't receive any signals for bribery cases**. Moreover, we had **zero confirmed incidents of corruption** and **no substantiated cases of bribery**.

Protection of Whistleblowers

The cornerstone of our efforts for ethical and accountable corporate culture is our **Local Whistleblowing Manual**. Through it, we have established a secure internal hotline, making it easy for anyone, including employees, interns, job applicants and suppliers, to raise concerns or report potential violations to our Compliance Team. We have ensured multiple ways for anyone to reach out to our Compliance Team: through email at **compliance@yettel.bg**, by phone or by arranging a personal meeting to raise concerns or report potential violations. Our comprehensive whistleblowing mechanism is in full compliance with the **Law on the Protection of Persons who Report or Publicly Disclose Information on Violations**, ensuring transparency, accountability and a safe and ethical work environment.

We actively **encourage all employees to speak up** if they suspect any breaches of our internal policies and rules, or of legal regulations. To make this process as accessible as possible, we have made the relevant contact information easily accessible on our intranet (Yettel Town) and our engagement app (Digital Office). We have also ensured that our reporting channel fully complies with whistleblower protection laws, with more details available on our corporate **website**. In 2024 we introduced a new web form that every employee or external party can use if they discover or suspect violations of laws or Yettel's Code of Ethics. To further strengthen our commitment, we have appointed a dedicated employee responsible for receiving, registering and reviewing whistleblowing reports, as well as maintaining a register of received reports and providing regular information to the Central External Reporting Authority and to our CEO.

We have also implemented a structured process for **managing and monitoring all reported concerns**. When a concern is raised, it is immediately recorded in a dedicated tracking sheet, allowing to carefully follow the progress of each case from start to finish. If an investigation confirms that a violation has occurred, the case is reported directly to our CEO and the relevant departments within our organization. This process ensures senior leadership is promptly informed and can collaborate on determining the most appropriate course of action.

We treat all complaints and concerns with the utmost confidentiality. We stand firmly against any form of retaliation towards those who report in good faith. We have implemented robust protection measures for whistleblowers and related persons (such as helpers, relatives and colleagues) to safeguard against various forms of retaliation, including dismissal, demotion, transfer, negative performance evaluations and discrimination. Whenever our investigation team confirms any violations of our policies and ethical standards, we take appropriate remedial actions, including contract terminations and disciplinary measures where necessary. To reinforce this commitment, we have integrated awareness of our whistleblowing channels into the trainings part of our standard induction process for all new team members.

Maintenance of a reporting channel is required by law according to the **Whistleblowing Directive in the EU**. In terms of ensuring business partners maintain reporting channels for whistleblowing, we have a certain threshold below which there's no requirement to have an internal channel for signals. Therefore, we do not employ this requirement for all business partners, rather only those above the threshold.

In 2024, we received **two whistleblower complaints cases** through the various available channels. Whenever the investigation team revealed, documented and proved internal policies and high ethics standards violations, respective remedy actions were taken, including contract termination and disciplinary sanctions.

At Yettel, we regularly assess employee **confidence in our reporting systems** through our annual DEI survey. The results demonstrate a **strong level of trust in our procedures**. Notably, 69% of employees fully support the statement that Yettel has a procedure for submitting and reviewing reports related to Diversity, Equity and Inclusion in the workplace. Furthermore, 70% of employees affirm that if they were subjected to discrimination or witnessed it, they would definitely report it through the established procedures. These findings indicate a high degree of employee confidence in our reporting systems and their willingness to use them when necessary.

Relationships with Suppliers

Yettel's **Local Sourcing Manual** outlines the company's structured approach to procurement. The document indicates that Yettel has established processes for vendor selection and evaluation, utilizing predefined criteria with specific weighing factors. These criteria encompass financial, technical, privacy and security aspects. The manual also emphasizes adherence to applicable Privacy and Information Security Policies throughout the sourcing process, demonstrating Yettel's commitment to responsible data management in supplier relationships.

At Yettel, we have developed a comprehensive guide that sets out **clear steps for how we handle invoices from receipt to payment**. We are committed to prompt payments, so we ask that invoices reach our Accounting Department within two business days of receipt or by the first working day of next month at the latest. To make things smoother, we encourage our partners to send invoices electronically. These practices aim to guide the way we conduct business with all our business partners.

Our approach to working with suppliers is centered around a well-structured process with **clear payment guidelines**. For additional vigilance, payment approvals have different levels of sign-off depending on the invoice amount. This thorough approach ensures our payments are accurate and in line with our financial controls, while still being processed in a timely manner. We plan to include specific practices related to small and medium-sized enterprises (SMEs) in the revision of the manual in 2025, aiming to create a more inclusive and supportive supply chain ecosystem that benefits both Yettel and its smaller suppliers.

As of the end of 2024, we are pleased to report that there were **zero outstanding legal proceedings against the company for late payments**, demonstrating our commitment to timely fulfilment of financial obligations.

Conflict of Interests

At Yettel, we strive to ensure that our professional decisions are based solely on objective criteria, without the influence of personal factors. We recognize that potential conflicts may arise from various sources, such as personal investments in external entities, familial ties or friendships with our suppliers. These situations could potentially compromise our objectivity and shift our focus away from Yettel's best interests.

To address such circumstances, **we emphasize the importance of transparency**. Employees are encouraged to proactively reach out to their supervisors or the Ethics & Compliance Officer for guidance, to voice concerns or to seek advice.

We take measures to assure that there are no personal or familial realtionships in hierarchial structures by placing emphasis on transparency and disclosure of personal relationships so that the company can take appropriate measures (e.g. move people to different teams, etc.)

In line with our corporate guidelines, any declarations of potential conflicts of interest are subject to thorough evaluation by both the Ethics & Compliance Officer and the relevant departmental director.

Our Ethics and Compliance Policy establishes a **clear decision-making hierarchy for conflicts of interest**, with Director-level employees handling initial assessments and the Board of Directors addressing the most complex cases, ensuring thorough oversight at all levels of the organization. Respectively, information on conflict of interests is disclosed to the relevant managerial level representative on a case-by-case basis.

Additional Company Information

Economic Performance

At Yettel, we are proud to be a socially responsible company that boosts Bulgaria's economy through our operations. Our business activities are more than just about profits, they are about driving national and regional growth. We're creating jobs, increasing incomes and contributing to the country's tax revenue. But we don't stop there – we are also investing in innovation and improving infrastructure across Bulgaria.

We are delighted that our positive influence reaches far beyond the areas where we directly operate. As an economic multiplier, we ensure that the value we create is shared fairly, not just in our local communities, but across the entire country.

Our commitment to corporate responsibility goes hand-in-hand with our dedication to legal compliance. We take our financial reporting and tax obligations very seriously, adhering to all relevant laws and regulations. This approach reflects our deep-rooted commitment to transparency and ethical business conduct.

The company's revenue in 2024 (in thousands EUR):
EUR 533,929

Direct Economic value generated and distributed (in thousands EUR):
EUR -31,700

Direct Economic Value Generated and Distributed in 2023 and 2024
(in thousands BGN)

	2023	2024
Economic value retained		
	66,130	-62,001
Breakdown		
Economic value generated	985,252	1,045,767
Net revenue	982,641	1,044, 274
Other operating revenue	2,611	1,493
Economic value distributed	919,122	1,099,931
To suppliers	682,552	736,070
To employees	71,103	77,641
To capital providers	87,947	230,000
To government	77,348	63,567
of which Spectrum licenses	53,498	31,349
To community	171	489

In 2024, Yettel Bulgaria continued its commitment to sustainable growth and community support by achieving impressive net revenues of 1.044 billion BGN and generating additional operating revenue of 1.493 million BGN. The company distributed a substantial economic value of nearly 1.100 billion BGN across its stakeholders, reflecting its dedication to fostering positive relationships and enhancing societal well-being. This includes significant investments in suppliers and employees, contributions to capital providers and the government, and meaningful support to local communities.

Financial Assistance Received From the Government

In 2024, we received financial assistance from the government to the amount of 121,282 BGN (VAT excluded).

Appendix A: GRI to ESRS disclosures mapping Index table

Material Topic (As named in Yettel's SR23)	**GRI Standards**	**GRI Disclosures**	**ESRS Disclosures which cover the GRI**	**Coverage by ESRS**	**GRI Disclosures NOT covered by the ESRS**
Mandatory Disclosures GRI 2	**GRI 2: General Disclosures 2021**	**GRI 2-1** Organizational details	Covered by Basis for Preparation	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-2 Entities included in the organization's sustainability reporting	**ESRS 1** 5.1; **ESRS 2** BP-1 5 (a) and (b) i	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-3 Reporting period, frequency and contact point	Covered by Basis for Preparation	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-4 Restatements of information	**ESRS 2** BP-2 §13, §14 (a) to (b)	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-5 External assurance	**ESRS 2** BP-2 §AR 2	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-6 Activities, value chain and other business relationships	**ESRS 2** SBM-1 §40 (a) i to (a) ii, (b) to (c), §42 (c)	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-7 Employees	**ESRS 2** SBM-1 §40 (a) iii; **ESRS S1** S1-6 §50 (a) to (b) and (d) to (e), §51 to §52	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-8 Workers who are not employees	**ESRS S1** S1-7 §55 to §56	Omitted in Yettel's Sustainability Report 2023.	-
		GRI 2-9 Governance structure and composition	Covered by the entire **ESRS 2** GOV-1	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-10 Nomination and selection of the highest governance body	Covered by the entire **ESRS 2** GOV-1	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-11 Chair of the highest governance body	Covered by the entire **ESRS 2** GOV-1	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-12 Role of the highest governance body in overseeing the management of impacts	**ESRS 2** GOV-1 §22 (c); GOV-2 §26 (a) to (b); SBM-2 §45 (d); **ESRS G1** §5 (a)	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-13 Delegation of responsibility for managing impacts	ESRS 2 GOV-1 §22 (c) i and ii; GOV2 §26 (a); **ESRS G1** G1-3 §18 (c)	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-14 Role of the highest governance body in sustainability reporting	**ESRS 2** GOV-1 §AR 3 (a) ii and iv; IRO-1 §53 (d)	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-15 Conflicts of interest	n/a	GRI disclosure is not covered by ESRS.	**a.** describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated; **b.** report whether conflicts of interest are disclosed to stakeholders, including, at a minimum, conflicts of interest relating to: **I.** cross-board membership; **II.** cross-shareholding with suppliers and other stakeholders; **III.** existence of controlling shareholders; **IV.** related parties, their relationships, transactions, and outstanding balances.

Material Topic (As named in Yettel's SR23)	GRI Standards	GRI Disclosures	ESRS Disclosures which cover the GRI	Coverage by ESRS	GRI Disclosures NOT covered by the ESRS
Mandatory Disclosures GRI 2	**GRI 2: General Disclosures 2021**	**GRI 2-16** Communication of critical concerns	**ESRS 2** GOV-2 §26 (a); **ESRS G1** G1-1 AR 1 (a); G1-3 §18 (c)	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-17 Collective knowledge of the highest governance body	**ESRS 2** GOV-1 §23	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-18 Evaluation of the performance of the highest governance body	n/a	Omitted in Yettel's Sustainability Report 2023.	-
		GRI 2-19 Remuneration policies	Covered by the entire **ESRS 2** GOV-3	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-20 Processes to determine remuneration	Covered by the entire **ESRS 2** GOV-3	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-21 Annual total compensation ratio	Only: GRI disclosures 2-21-a and 2-21-c are covered by: **ESRS S1** S1-16 §97 (b) to (c)	Omitted in Yettel's Sustainability Report 2023.	-
		GRI 2-22 Statement on sustainable development strategy	**ESRS 2** SBM-1 §40 (g)	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-23 Policy commitments	**ESRS 2** GOV-4; MDR-P §65 (b) to (c) and (f); **ESRS S1** S1-1 §19 to §21, §24 (c) and §AR 14; **ESRS S2** S2-1 §16 to §17, §19, and §AR 16; **ESRS S4** S4-1 §15 to §17, and §AR 13; **ESRS G1** G1-1 §7 and §AR 1 (b)	Omitted in Yettel's Sustainability Report 2023.	-
		GRI 2-24 Embedding policy commitments	**ESRS 2** GOV-2 §26 (b); MDR-P §65 (c); **ESRS S1** S1-4 §AR 35; **ESRS S2** S2-4 §AR 30; **ESRS S3** S3-4 §AR 27; **ESRS S4** S4-4 §AR 27; **ESRS G1** G1-1 §9 and §10 (g)	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-25 Processes to remediate negative impact	**ESRS S1** S1-1 §20 (c), §AR 17 (g); S1-3 §32 (a), (b) and (e), §AR 31; **ESRS S2** S2-1 §17 (c); S2-3 §27 (a), (b) and (e), §AR 26; S2-4 §33 (c); **ESRS S3** S3-1 §16 (c); S3-3 §27 (a), (b) and (e), §AR 23; S3-4 §33 (c); **ESRS S4** S4-1 §16 (c); S4-3 §25 (a), (b) and (e), §AR 23; S4-4 §32 (c)	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-26 Mechanisms for seeking advice and raising concerns	**ESRS S1** S1-3 §AR 32 (d); **ESRS S2** S2-3 §AR 27 (d); **ESRS S3** S3-3 §AR 24 (d); **ESRS S4** S4-3 §AR 24 (d); **ESRS G1** G1-1 §10 (a); G1-3 §18 (a)	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-27 Compliance with laws and regulations	**ESRS 2** SMB-3 §48 (d); **ESRS E2** E2- 4 §AR 25 (b); **ESRS S1** S1-17 §103 (c) to (d) and §104 (b); **ESRS G1** G1- 4 §24 (a)	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-28 Membership in associations	Covered by the entire G1 topic	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-29 Approach to stakeholder engagement	**ESRS 2** SMB-2 §45 (a) i to (a) iv; **ESRS S1** S1-1 §20 (b); S1-2 §27 (e) and §28; **ESRS S2** S2-1 §17 (b); S2-2 §22 (e) and §23; **ESRS S3** S3-1 §16 (b); S3-2 §21 (d) and §22; **ESRSS4 S4**-1 §16 (b); S4-2 §20 (d) and §21	GRI disclosure is entirely covered by ESRS.	-
		GRI 2-30 Collective bargaining agreements	**ESRS S1** S1-8 §60 (a) and §61	Omitted in Yettel's Sustainability Report 2023.	-

Material Topic (As named in Yettel's SR23)	GRI Standards	GRI Disclosures	ESRS Disclosures which cover the GRI	Coverage by ESRS	GRI Disclosures NOT covered by the ESRS
GRI 3	**GRI 3: Material Topics 2021**	**GRI 3-1** Process to determine material topics	**ESRS 2** BP-1 §AR 1 (a); IRO-1 §53 (b) ii to (b) iv	GRI disclosure is entirely covered by ESRS.	-
		GRI 3-2 List of material topics	**ESRS 2** SBM-3 §48 (a) and (g); BP-2 §17 (a)	GRI disclosure is entirely covered by ESRS.	-
		3-3 Topic Management	**ESRS 2** SBM-1 §40 (e); SBM-3 §48 (c) i and (c) iv; MDR-P §62, §65 (a); MDR-A §62, §68 (a) and (d); MDR-M §72, §75; MDR-T §72, §80 (b) and (j), §81 (a) to (b); BP-2 §17 (b) to (e); **ESRS S1** S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); **ESRS S2** S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); **ESRS S3** S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); **ESRS S4** S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)	GRI disclosure is entirely covered by ESRS.	-
	GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Only: GRI disclosure 201-1-a-i is covered by: **ESRS 2** SBM-1 §40 (b	GRI disclosure is partly covered by ESRS.	**a.** Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components: **II.** Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments; **III.** Economic value retained: 'direct economic value generated' less 'economic value distributed'. **b.** Where significant, report EVG&D separately at country, regional, or market levels, and the criteria used for defining significance. **Compilation requirements** 2.1 When compiling the information specified in Disclosure 201-1, the reporting organization shall, if applicable, compile the EVG&D from data in the organization's audited financial or profit and loss (P&L) statement, or its internally audited management accounts.
		201-2 Financial implications and other risks and opportunities due to climate change	**ESRS 2** SBM-3 §48 (a), and (d) to (e); **ESRS E1** §18; E1-3 §28; E1-9 §66 (a); §67 (a) and §69 (a)	Omitted in Yettel's Sustainability Report 2023.	-
		201-3 Defined benefit plan obligations and other retirement plans	n/a	GRI disclosure is not covered by ESRS.	**a.** If the plan's liabilities are met by the organization's general resources, the estimated value of those liabilities. **b.** If a separate fund exists to pay the plan's pension liabilities: **I.** the extent to which the scheme's liabilities are estimated to be covered by the assets that have been set aside to meet them; **II.** the basis on which that estimate has been arrived at; **III.** when that estimate was made. **c.** If a fund set up to pay the plan's pension liabilities is not fully covered, explain the strategy, if any, adopted by the employer to work towards full coverage, and the timescale, if any, by which the employer hopes to achieve full coverage.

Material Topic (As named in Yettel's SR23)	GRI Standards	GRI Disclosures	ESRS Disclosures which cover the GRI	Coverage by ESRS	GRI Disclosures NOT covered by the ESRS
GRI 3	**GRI 201: Economic Performance 2016**	201-3 Defined benefit plan obligations and other retirement plans	n/a	GRI disclosure is not covered by ESRS.	**d.** Percentage of salary contributed by employee or employer. **e.** Level of participation in retirement plans, such as participation in mandatory or voluntary schemes, regional, or country-based schemes, or those with financial impact.
		201-4 Financial assistance received from government	n/a	GRI disclosure is not covered by ESRS.	**a.** Total monetary value of financial assistance received by the organization from any government during the reporting period, including: **I.** tax relief and tax credits; **II.** subsidies; **III.** investment grants, research and development grants, and other relevant types of grant; **IV.** awards; **V.** royalty holidays; **VI.** financial assistance from Export Credit Agencies (ECAs); **VII.** financial incentives; **VIII.** other financial benefits received or receivable from any government for any operation. **b.** The information in 201-4-a by country. **c.** Whether, and the extent to which, any government is present in the shareholding structure. **Compilation requirements** 2.5 When compiling the information specified in Disclosure 201-4, the reporting organization shall identify the monetary value of financial assistance received from government through consistent application of generally accepted accounting principles.
Digital inclusion and coverage **Innovation, research and development**	**GRI 203: Indirect Economic Impacts 2016**	203-1 Infrastructure investments and services supported	**ESRS S3** S3-4 §AR 37	GRI disclosure is entirely covered by ESRS.	-
		203-2 Significant indirect economic impacts	**ESRS S1** S1-4 §AR 41; **ESRS S2** S2- 4 §AR 37; **ESRS S3** S3-4 §AR 36; **ESRS S4** S4-4 §AR 34	GRI disclosure is entirely covered by ESRS.	-
Corporate governance **Human Rights Protection**	**GRI 205: Anticorruption 2016**	3-3 Topic Management	**ESRS G1** G1-1 §7; G1-3 §18 (a); G1- 4 §24 (b)	GRI disclosure is entirely covered by ESRS.	-
		205-1 Operations assessed for risks related to corruption procedures	**ESRS G1** G1-3 §AR 5	GRI disclosure is entirely covered by ESRS.	-
		205-2 Communication and training about anti-corruption policies and procedures	**ESRS G1** G1-3 §20, §21 (b) and (c) and §AR 7 and 8	GRI disclosure is entirely covered by ESRS.	-
		205-3 Confirmed incidents of corruption and actions taken	**ESRS G1** G1-4 §25	GRI disclosure is entirely covered by ESRS.	-

Material Topic (As named in Yettel's SR23)	GRI Standards	GRI Disclosures	ESRS Disclosures which cover the GRI	Coverage by ESRS	GRI Disclosures NOT covered by the ESRS
Climate Change	**GRI 302: Energy 2016**	3-3 Topic Management	**ESRS E1** E1-2 §24 and §25 (c) to (d); E1-3 §28; E1-4 §32 and §33	GRI disclosure is entirely covered by ESRS.	-
		302-1 Energy consumption within the organization	Covered by the entire E1 topic	GRI disclosure is entirely covered by ESRS.	-
		302-2 Energy consumption outside the organization	Covered by the entire E1 topic	GRI disclosure is entirely covered by ESRS.	-
		302-3 Energy intensity	**ESRS E1** E1-5 §40	GRI disclosure is entirely covered by ESRS.	-
		302-4 Reduction of energy consumption	Covered by the entire E1 topic	GRI disclosure is entirely covered by ESRS.	-
		302-5 Reductions in energy requirements of products and services	Covered by the entire E1 topic	GRI disclosure is entirely covered by ESRS.	-
Climate Change	**GRI 305: Emissions 2016**	3-3 Topic Management	**ESRS E1** E1-2 §24; E1-3 §28; E1-4 §32, §33 and §34 (b); E1-7 §56 §58 (a); §59 (a); §61 (a) and (c); §AR 61; §AR 62 (b); **ESRS E2** §AR 9 (b); E2- 1 §14; E2-2 §18 and §19; E2-3 §22	GRI disclosure is entirely covered by ESRS.	-
		305-1 Direct (Scope 1) GHG Emissions	**ESRS E1** E1-4 §34 (c); E1-6 §44 (a); §46; §48 (a); §50; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 40; AR §43 (c) to (d)	GRI disclosure is entirely covered by ESRS.	-
		305-2 Energy Indirect (Scope 2) GHG Emissions	**ESRS E1** E1-4 §34 (c); E1-6 §44 (b); §46; §49; §50; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 40; §AR 45 (a), (c), (d), and (f)	GRI disclosure is entirely covered by ESRS.	-
		305-3 Other indirect (Scope 3) GHG Emissions	**ESRS E1** E1-4 §34 (c); E1-6 §44 (c); §51; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 46 (a) (i) to (k)	GRI disclosure is entirely covered by ESRS.	-
		305-4 GHG Emissions Intensity	**ESRS E1** E1-6 §53; §AR 39 (c)	GRI disclosure is entirely covered by ESRS.	-
		305-5 Reduction of GHG Emissions	**ESRS E1** E1-3 §29 (b); E1-4 §34 (a) to (c); §AR 25 (b) and (c); E1-7 §56 (b)	GRI disclosure is entirely covered by ESRS.	-
		305-6 Emissions of ozone-depleting substances (ODS)	Only: GRI disclosure 305-6-a is covered by: **ESRS E2** E2-5 §34	Omitted in Yettel's Sustainability Report 2023.	-
		305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	**ESRS E2** E2-4 §28 (a); §30 (b) and (c); §31; §AR 21	Omitted in Yettel's Sustainability Report 2023.	-

Material Topic (As named in Yettel's SR23)	GRI Standards	GRI Disclosures	ESRS Disclosures which cover the GRI	Coverage by ESRS	GRI Disclosures NOT covered by the ESRS
Waste and circular economy	**GRI 306: Waste 2020**	3-3 Topic Management	**ESRS E5** §AR 7 (a); E5-1 §14; E5-2 §19; E5-3 §23	GRI disclosure is entirely covered by ESRS.	-
		306-1 Waste generation and significant waste-related impacts	**ESRS 2** SBM-3 §48 (a), (c) ii and iv; **ESRS E5** §AR 7 (f); E5-4 §30	GRI disclosure is entirely covered by ESRS.	-
		306-2 Management of significant waste-related impacts	**ESRS E5** E5-2 §19 and §20 (e) and (f); E5-5 §40 and §AR 33 (c)	GRI disclosure is entirely covered by ESRS.	-
		306-3 Waste generated	**ESRS E5** E5-5 §37 (a), §38 to §40	GRI disclosure is entirely covered by ESRS.	-
		306-4 Waste diverted from disposal	**ESRS E5** E5-5 §37 (b), §38 and §40	GRI disclosure is entirely covered by ESRS.	-
		306-5 Waste directed to disposal	**ESRS E5** E5-5 §37 (b), §38 and §40	GRI disclosure is entirely covered by ESRS.	-
Occupational health & safety	**GRI 403: Occupational Health and Safety 2018**	3-3 Topic Management	**ESRS S1** S1-1 §19; §20 (c); S1-2 §27; S1-4 §37 to §39; §AR 33; §AR 40 (a); S1-5 §46; §47 (b) and (c); S1- 17 §104 (a); **ESRS S2** §11 (c); S2-1 §16; §17 (c); S2-2 §22; S2-4 §32; §33 (a) and (b); §36; §AR 33; §AR 36 (a); S2-5 §41, §42 (b) and (c)	GRI disclosure is entirely covered by ESRS.	-
		403-1 Occupational health and safety management system	**ESRS S1** S1-1 §23	GRI disclosure is entirely covered by ESRS.	-
		403-2 Hazard identification, risk assessment, and incident investigation	Covered by the entire **ESRS S1** S1-3	GRI disclosure is entirely covered by ESRS.	-
		403-3 Occupational health services	**ESRS S1** S1-1 §AR 17 (d)	GRI disclosure is entirely covered by ESRS.	-
		403-4 Worker participation, consultation, and communication on occupational health and safety	Covered by the entire S1 topic	GRI disclosure is entirely covered by ESRS.	-
		403-5 Worker training on occupational health and safety	Covered by the entire S1 topic	GRI disclosure is entirely covered by ESRS.	-
		403-6 Promotion of worker health	Covered by the entire S1 topic	GRI disclosure is entirely covered by ESRS.	-
		403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	**ESRS S2** S2-4 §32 (a)	GRI disclosure is entirely covered by ESRS.	-
		403-8 Workers covered by an occupational health and safety management system	**ESRS S1** S1-14 §88 (a); §90	GRI disclosure is entirely covered by ESRS.	-
		403-9 Work-related injuries	**ESRS S1** S1-4, §38 (a); S1-14 §88 (b) and (c); §AR 82	GRI disclosure is entirely covered by ESRS.	-
		403-10 Work-related ill health	**ESRS S1** S1-4, §38 (a); S1-14 §88 (b) and (d); §89; §AR 82	GRI disclosure is entirely covered by ESRS.	-

Material Topic (As named in Yettel's SR23)	GRI Standards	GRI Disclosures	ESRS Disclosures which cover the GRI	Coverage by ESRS	GRI Disclosures NOT covered by the ESRS
Employment & skills development	**GRI 404: Training and Education 2016 2020**	3-3 Topic Management	**ESRS S1** S1-1 §19; §20 (c); S1-2 §27; S1-4 §37 to §39; §AR 33; §AR 40 (a); S1-5 §46; §47 (b) and (c); S1- 17 §104 (a); **ESRS S2** §11 (c); S2-1 §16; §17 (c); S2-2 §22; S2-4 §32; §33 (a) and (b); §36; §AR 33; §AR 36 (a); S2-5 §41, §42 (b) and (c)	GRI disclosure is entirely covered by ESRS.	-
		404-1 Average hours of training per year per employee	**ESRS S1** S1-13 §83 (b) and §84	GRI disclosure is entirely covered by ESRS.	-
		404-2 Programs for upgrading employee skills and transition assistance programs	**ESRS S1** S1-1 §AR 17 (h)	GRI disclosure is entirely covered by ESRS.	-
		404-3 Percentage of employees receiving regular performance and career development reviews	**ESRS S1** S1-13 §83 (a) and §84	GRI disclosure is entirely covered by ESRS.	-
Diversity and Inclusion	**GRI 405: Diversity and Equal Opportunity 2016**	3-3 Topic Management	**ESRS S1** S1-1 §19; §20 (c); §24 (a); S1-2 §27; S1-4 §37 to §39; §AR 33; §AR 40 (a); S1-5 §46; §47 (b) and (c); S1- 17 §104 (a); **ESRS S2** §11 (c); S2-1 §16; §17 (c); S2-2 §22; S2-4 §32; §33 (a) and (b); §36; §AR 33; §AR 36 (a); S2-5 §41, §42 (b) and (c)	GRI disclosure is entirely covered by ESRS.	-
		405-1 Diversity of governance bodies and employees	**ESRS 2** GOV-1 §21 (d); **ESRS S1** S1-6 §50 (a); S1-9 §66 (a) to (b); S1- 12 §79	GRI disclosure is entirely covered by ESRS.	-
		405-2 Ratio of basic salary and remuneration of women to men	**ESRS S1** S1-16 §97 and §98	Omitted in Yettel's Sustainability Report 2023.	-
	GRI 406: Nondiscrimination 2016	3-3 Topic Management	**ESRS S1** S1-1 §19; §20 (c); §24 (a) and (d); S1-2 §27; S1-4 §37 to §39; §AR 33; §AR 40 (a); S1-5 §46; §47 (b) and (c); **ESRS S2** §11 (c); S2-1 §16; §17 (c); S2-2 §22; S2-4 §32; §33 (a) and (b); §36; §AR 33; §AR 36 (a); S2-5 §41, §42 (b) and (c); **ESRS S4** §10 (b); S4-1 §15; §16 (c); S4-2 §20; S4-4 §31; §32 (a) and (b); §35; §AR 30; §AR 33 (a); S4-5 §41; §41 (b) and (c)	GRI disclosure is entirely covered by ESRS.	-
		406-1 Incidents of discrimination and corrective actions taken	**ESRS S1** S1-17 §103 (a), §AR 103	Omitted in Yettel's Sustainability Report 2023.	-
Product and service accessibility, client responsibility	**GRI 416: Customer Health and Safety 2016**	3-3 Topic Management	Covered by the entire S4 topic	Omitted in Yettel's Sustainability Report 2023.	-
		416-1 Assessment of the health and safety impacts of product and service categories	Covered by the entire S4 topic	Omitted in Yettel's Sustainability Report 2023.	-
		416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	**ESRS S4** S4-4 §35	Omitted in Yettel's Sustainability Report 2023.	

Material Topic (As named in Yettel's SR23)	GRI Standards	GRI Disclosures	ESRS Disclosures which cover the GRI	Coverage by ESRS	GRI Disclosures NOT covered by the ESRS
Cybersecurity & privacy	**GRI 418: Customer Privacy 2016**	3-3 Topic Management	**ESRS S4** §10 (b); S4-1 §15 and §16 (c); S4-2 §20; S4-4 §31, §32 (a) and (b), §35, §AR 30, §AR 33 (a); S4-5 §41, §41 (b) and (c)	GRI disclosure is entirely covered by ESRS.	-
		418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	**ESRS S4** S4-3 §AR 23; S4-4 §35	GRI disclosure is entirely covered by ESRS.	-
		Entity specifc: Cybersecurity (focused on protection from cyber attacks; not related to data privacy)	n/a	GRI disclosure is not covered by ESRS.	-
Critical Infrastructure New topic for Yettel	**Entity specific**	3-3 Topic Management	n/a	GRI disclosure is not covered by ESRS.	-
Local communities	**Entity specific**	3-3 Topic Management	As per Yettel's DMA, the topic of local communities is mapped to **ESRS S4** End-users and consumers.	GRI disclosure is entirely covered by ESRS.	-
Sustainable Supply Chains	**Entity specific**	3-3 Topic Management	As per Yettel's DMA, the topic of Sustainable Supply Chain is mapped to **ESRS S2**. The topic will also be refered to in other topical ESRS standards through the mandatory disclosure requirements regarding the company's value chain.	GRI disclosure is entirely covered by ESRS.	-

Appendix B: Material Impacts, Risks and Opportunities

List of material sustainability impacts, risks, and opportunities

Sustainability matter	Material Sub- and Sub-sub-topics	Impacts description	Risk and Opportunities description	Value chain	Time horizons
E1 - Climate change	**Climate change mitigation**	Consumption of electricity and heat purchased by infrastructure provider to power networks and technology centres. The release of greenhouse gas emissions into the atmosphere is one of the catalysts of global warming and its consequential climate change. The company inadvertently exacerbates this climate change via the emissions of greenhouse gas discharges that are associated with their upstream. This results in a negative actual impact on climate change.	There is a PPA in place, therefore, we expect some cost savings.	Upstream	Short-term Medium-term Long-term
		Production of emissions from purchased goods such as electronic devices (mobile phones, tablets, etc.), that consume large amounts of energy during production/extraction/processing/transportation. Release of greenhouse gas emissions into the atmosphere is one of the catalysts of global warming and its consequential climate change. The company inadvertently exacerbates this climate change via the emissions of greenhouse gas discharges that are associated with their upstream. This results in a negative actual impact on climate change.	n/a	Upstream	Short-term Medium-term Long-term
		Production of emissions from purchased network services and goods used where such as infrastructure equipment, telecommunication cable and construction material that consume large amounts of energy during production/extraction/processing/transportation. Release of greenhouse gas emissions into the atmosphere is one of the catalysts of global warming and its consequential climate change. The company inadvertently exacerbates this climate change via the emissions of greenhouse gas discharges that are associated with their upstream. This results in a negative actual impact on climate change.	n/a	Upstream	Short-term Medium-term Long-term
		Production of emissions linked to the use of sold products, including end-of-life treatment of sold products. Release of greenhouse gas emissions into the atmosphere is one of the catalysts of global warming and its consequential climate change. The company inadvertently exacerbates this climate change via the emissions of greenhouse gas discharges that are associated with their downstream. This results in a negative actual impact on climate change.	n/a	Downstream	Short-term Medium-term Long-term

		n/a	Inadvertent exacerbation of climate change via the emissions of greenhouse gas discharges associated with purchased fuel for business operations can lead to:
			  - failure to meet emissions reduction targets or to comply with governmental regulations and can result in fines or legal action
			  - risks arising from the increased price or availability of sufficient electricity supply
			  - carbon tax or cap-and-trade policies and may thus increase operating costs
			  - reputational risks if the company is seen as contributing to environmental degradation (or not doing enough to address the issue of climate change.)
				Upstream	Short-term Medium-term Long-term

Sustainability matter	Material Sub- and Sub-sub-topics	Impacts description	Risk and Opportunities description	Value chain	Time horizons
E1 - Climate change	Energy	Implementation of 5G solutions which are more energy efficient and can reduce the carbon footprint in the value chain.	n/a	Upstream Own operation Downstream	Short-term Medium-term Long-term
E5 - Resource use and circular economy	Resource inflows, including resource use	Resource depletion from resource gain for production of new products/devices contributes to resource scarcity and use of primary raw materials.	n/a	Upstream	Short-term Medium-term Long-term
E5 - Resource use and circular economy	Waste	Production of e-waste and hazardous waste	n/a	Downstream	Short-term Medium-term Long-term
		Improper disposal and recycling of e-waste might lead to microplastics pollution.	n/a	Downstream	Short-term Medium-term Long-term
		Production of waste from packaging materials from purchased and sold goods (including pallets).	n/a	Upstream Downstream	Short-term Medium-term Long-term
		Production of waste from sold accessories (e.g., phone cases).	n/a	Downstream	Short-term Medium-term Long-term
		Implementation of e-billing solutions to reduce paper waste	n/a	Own operation Downstream	Short-term Medium-term Long-term
S1 - Own workforce	Working conditions	Inadequate employee protection system No option to take family-related leave (maternity/paternity/parental or carers' leave)	n/a	Own operation	Short-term Medium-term Long-term
		Implementing policies above market standards that prioritize employee well-being, such as flexible working hours, mental health resources, and regular safety trainings, can foster a supportive environment that reduces stress and enhances overall job satisfaction. Considerable work-life balance benefits including generous time off, offer of flexible working hours for employees after maternity/paternity/parental leave and/ or with very small child	n/a	Own operation	Short-term Medium-term Long-term
		Deficiencies in prevention and education of employees in H&S system Low coverage of employees by H&S system Overloaded or burnt-out employees Recorded fatal and life- altering injuries/ accidents Work days lost due to work-related ill health	n/a	Own operation	Short-term Medium-term Long-term
	Equal treatment and opportunities for all	Unequal % of women in the workforce and high gender pay gap in own workforce (discrimination in hiring and promotion against women can reduce the company's access to qualified labour and harm its reputation).	n/a	Own operation	Short-term Medium-term Long-term
		Unequal % of women in the workforce due to the nature of technical positions	n/a	Own operation	Short-term Medium-term Long-term

Sustainability matter	Material Sub- and Sub-sub-topics	Impacts description	Risk and Opportunities description	Value chain	Time horizons
S1 - Own workforce	Equal treatment and opportunities for all	Nearly even split between males and females, reducing the male-female wage gap	n/a	Own operation	Short-term Medium-term Long-term
		Absence of structured programs and initiatives aimed at enhancing the knowledge, competencies, and abilities of employees, enabling them to perform their roles effectively and to adapt to changing job requirements or career advancements. Low amount and unequal distribution of training Low % of employees with regular performance and development reviews	n/a	Own operation	Short-term Medium-term Long-term
		Implementation of structured programs and initiatives geared towards enhancing the knowledge, competencies, and abilities of employees ensures their effective performance in current roles and facilitates seamless adaptation to changing job requirements or career advancements, fostering a dynamic and empowered workforce	n/a	Own operation	Short-term Medium-term Long-term
		Failing to provide accessibility features in the workplace, such as ramps, elevators, or tools for differently abled employees, restricts the full participation and opportunities available to those individuals. No or ineffective accessibility measures for employees with disabilities Low % of employees with disabilities	n/a	Own operation	Short-term Medium-term Long-term
		Inclusive work environment that acknowledges and values the skills and perspectives of individuals with disabilities over and above the obligation from the Government	n/a	Own operation	Short-term Medium-term Long-term
		Occurrence of violence and harassment in the workplace: can lead to psychological disorders and other forms of harm and human rights; Number of cases reported and investigated	n/a	Own operation	Short-term Medium-term Long-term
		Enforcement of zero tolerance policies for violence and harassment at workplace, improving complaint mechanisms, increasing sanctions against violence and harassment, providing training for prevention to management	n/a	Own operation	Short-term Medium-term Long-term
		Weaknesses in recruitment and employment policy. No or low representation of ethnic groups, age groups and/or minorities in own workforce	n/a	Own operation	Short-term Medium-term Long-term
		Equal representation of ethnic groups, age groups and/or minorities in own workforce. Implementation of policy for inclusiveness, training on diversity and inclusion, targeted recruitment of underrepresented groups	n/a	Upstream Own operation Downstream	Short-term Medium-term Long-term

Sustainability matter	Material Sub- and Sub-sub-topics	Impacts description	Risk and Opportunities description	Value chain	Time horizons
S1 – Own workforce	**Other work-related rights**	Weaknesses in recruitment and employment policy - use of child labour or forced labour. Not only for own employees but also for contractors, e.g. cleaning services etc. Such work interferes with a child's development, e.g., by preventing schooling or restricting human rights if forced.	n/a	Own operation	Short-term Medium-term Long-term
		Leakage of private employee data Retaliation against whistleblowers. If employees who raise concerns about unethical or illegal activities within the company face retaliation, it infringes on their rights and creates a culture of fear, inhibiting transparency and accountability.	n/a	Own operation	Short-term Medium-term Long-term
		Ensuring data protection and privacy by having strong policies and processes in place.	n/a	Own operation Downstream	Short-term Medium-term Long-term
S2 – Workers in the value chain	**Working conditions** **Equal treatment and opportunities for all** **Other work-related rights**	Absence or deficiencies in supplier management programme that would prevent breaches in human rights of its employees	n/a	Upstream	Short-term Medium-term Long-term
		Mining of minerals / materials needed to create electronics may use child or forced labour in developing countries.	n/a	Upstream	Short-term Medium-term Long-term
		Manufacture of electronics may use child or forced labour in developing countries.	n/a	Upstream	Short-term Medium-term Long-term
S4 – Consumers and end-users	**Information-related impacts for consumers and/or end-users**	Improper handling or processing of user data can result in privacy violations, leading to identity theft, financial loss, or other personal damages to consumers.	n/a	Upstream Own operation Downstream	Short-term Medium-term Long-term
		Strengthening customer data protection and increasing network resilience to cyberattacks and internet fraud	Continuously supporting innovation in data security can protect a business from the legal consequences of a data breach and improve its position with a secure environment	Upstream Own operation Downstream	Short-term Medium-term Long-term
		Using technologies and expertise to improve consumers' lives through raising awareness and improving their digital literacy.	n/a	Own operation Downstream	Short-term Medium-term Long-term
		Dissemination of inaccurate or low-quality information can lead consumers/end-users to make ill-informed decisions, potentially causing harm or unintended consequences.	n/a	Own operation Downstream	Short-term Medium-term Long-term
		Providing customers with accurate and high-quality information about offered products and services.	n/a	Own operation Downstream	Short-term Medium-term Long-term
		Consumers or end-users experience harm to health or well-being due to a company's products or services (e.g. addiction to technology, emissions of electromagnetic radiation) Insufficient policies, procedures, and practices implemented to prevent physical and mental harm to consumers/ end-users of products and services.	n/a	Own operation Downstream	Short-term Medium-term Long-term
		Training people in digital skills and internet safety.	n/a	Own operation Downstream	Short-term Medium-term Long-term

Sustainability matter	Material Sub- and Sub-sub-topics	Impacts description	Risk and Opportunities description	Value chain	Time horizons
S4 - Consumers and end-users	**Information-related impacts for consumers and/or end-users**	Children spend a significant amount of time online and excessively use mobile technologies. At the same time children are more vulnerable and exposed to greater online harms than adults.	n/a	Upstream Own operation Downstream	Short-term Medium-term Long-term
		Supporting parents and children with online safety educational tools, deploying parental control tools and backing wider initiatives such as child helplines	n/a	Upstream Own operation Downstream	Short-term Medium-term Long-term
		Insufficient procedures, and practices implemented to allow all individuals or communities to easily and affordably obtain and use goods, services, or information without barriers or discrimination. Failure to consider diverse consumer needs can lead to products or services that exclude specific user groups.	n/a	Own operation Downstream	Short-term Medium-term Long-term
		Insufficient policies, procedures, and practices implemented to ensure transparent promotion of products or services, ensuring that the information presented is accurate, fair, and non-deceptive, and that it respects the rights, culture, and well-being of the target audience. Failure to ensure that all policies and procedures are always followed.	n/a	Own operation Downstream	Short-term Medium-term Long-term
G1 - Business conduct	**Corporate culture**	A company culture that tolerates or encourages unhealthy competition, discrimination or harassment can result in a toxic working environment, lower employee morale and higher turnover	n/a	Own operation	Short-term Medium-term Long-term
		A responsible company with transparent governance, integrity, and ethical foundations	n/a	Own operation	Short-term Medium-term Long-term
		If the prevailing culture prioritises profit over ethics, this unethical decision-making may lead to decisions that harm customers, the environment or other stakeholders	n/a	Upstream Own operation Downstream	Short-term Medium-term Long-term
	Protection of whistleblowers	Insufficient protection of whistleblowers may lead to unethical business conduct and retaliation against whistleblowers	n/a	Upstream Own operation Downstream	Short-term Medium-term Long-term
	Political engagement	Unethical lobbying activities and initiatives by companies may lead or influence public policy, regulation and government decisions concerning their activities	n/a	Own operation	Short-term Medium-term Long-term
	Management of relationships with suppliers including payment practices	Insufficient policies, procedures, and practices implemented with regards to management of relationships with suppliers (including payment practices), in the context of business conduct, refers to the strategies, policies, and practices a business adopts to interact with, evaluate, and remunerate its suppliers, ensuring ethical, timely, and transparent transactions.	n/a	Upstream Own operation	Short-term Medium-term Long-term
	Corruption and bribery	Insufficient policies, procedures, and practices implemented to prevent unethical practices involving the offering, giving, receiving, or soliciting of any item of value to influence the actions of an individual in a position of authority.	n/a	Own operation	Short-term Medium-term Long-term

Sustainability matter	Material Sub- and Sub-sub-topics	Impacts description	Risk and Opportunities description	Value chain	Time horizons
Company specific	**Cybersecurity**	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	**Litigation and Financial Costs:** If sensitive data are leaked or misused, it may expose the company to legal actions, leading to significant financial penalties and litigation costs. **Reputational Damage:** Cases of compromised personal data can result in negative publicity, diminishing trust among existing and potential customers and damaging the brand's reputation. Increased **Trust and Loyalty:** Effective privacy protections can enhance trust between the company and its costumers/end users, fostering loyalty and potentially leading to a loyal end user/customer base.	Upstream Own operation Downstream	Short-term Medium-term Long-term

Appendix C: Disclosure requirement in ESRS covered by Yettel's sustainability statement

CSRD Disclosures	Corresponding GRI Disclosures	Page
ESRS 2: General disclosures		
BP-1 General basis for preparation of the sustainability statements	GRI 2-1 Organizational details GRI 2-2 Entities included in the organization's sustainability reporting GRI 2-3 Reporting period, frequency and contact point GRI 3-1 Process to determine material topics	page 5
BP-2 Disclosures in relation to specific circumstances	GRI 2-1 Organizational details GRI 2-3 Reporting period, frequency and contact point GRI 2-4 Restatements of information GRI 2-5 External assurance GRI 3-2 List of material topics GRI 3-3 Topic Management	pages 5 and 6
GOV-1 The role of the administrative, management and supervisory bodies	GRI 2-9 Governance structure and composition GRI 2-10 Nomination and selection of the highest governance body GRI 2-11 Chair of the highest governance body GRI 2-12 Role of the highest governance body in overseeing the management of impacts GRI 2-13 Delegation of responsibility for managing impacts GRI 2-14 Role of the highest governance body in sustainability reporting GRI 2-17 Collective knowledge of the highest governance body GRI 405-1 Diversity of governance bodies and employees	pages 17, 18, 19, 20

CSRD Disclosures	Corresponding GRI Disclosures	Page
GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	GRI 2-12 Role of the highest governance body in overseeing the management of impacts GRI 2-16 Communication of critical concerns GRI 2-24 Embedding policy commitments	pages 9, 10, 11, 19, 24
GOV-3 Integration of sustainability-related performance in incentive schemes	GRI 2-13 Delegation of responsibility for managing impacts GRI 2-19 Remuneration policies GRI 2-20 Processes to determine remuneration	n/a
GOV-4 Statement on due diligence	GRI 2-23 Policy commitments	pages 17, 18, 19, 20
GOV-5 Risk management and internal controls over sustainability reporting	-	pages 21, 22, 27, 28, 29
SBM-1 Strategy, business model and value chain (value-creation process)	GRI 2-6 Activities, value chain and other business relationships GRI 2-7 Employees GRI 2-22 Statement on sustainable development strategy GRI 3-3 Topic Management	pages 21, 22, 27, 28, 29
SBM-2 Interests and views of stakeholders	GRI 2-12 Role of the highest governance body in overseeing the management of impacts GRI 2-29 Approach to stakeholder engagement	pages 13, 14, 15, 16, 18
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	GRI 2-27 Compliance with laws and regulations GRI 3-2 List of material topics GRI 3-3 Topic Management; 201-2 Financial implications and other risks and opportunities due to climate change GRI 306-1 Waste generation and significant waste-related impacts	pages 9, 10, 11, 12, 24
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	GRI 2-14 Role of the highest governance body in sustainability reporting GRI 3-1 Process to determine material topics	pages 23 and 24
IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement	-	this disclosure requirement is covered by this table, i.e. Appendix C

CSRD Disclosures	Corresponding GRI Disclosures	Page
ESRS E1: Climate change		
GOV-3 Integration of sustainability-related performance in incentive schemes	-	n/a
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	GRI 201-2 Financial implications and other risks and opportunities due to climate change	pages 25, 27, 28, 29
IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	-	pages 27, 28, 29
E1-1 Transition plan for climate change mitigation	GRI 302-4 Reduction of energy consumption GRI 302-5 Reductions in energy requirements of products and services	pages 27, 28, 29
E1-2 Policies related to climate change mitigation and adaptation	GRI 3-3 Topic Management	page 26
E1-3 Actions and resources in relation to climate change policies	GRI 201-2 Financial implications and other risks and opportunities due to climate change GRI 3-3 Topic GRI 305-5 Reduction of GHG Emissions	pages 29 and 30
E1-4 Targets related to climate change mitigation and adaptation	GRI 3-3 Topic Management GRI 305-1 Direct (Scope 1) GHG Emissions GRI 305-2 Energy Indirect (Scope 2) GHG Emissions GRI 305-3 Other indirect (Scope 3) GHG Emissions GRI 305-5 Reduction of GHG Emissions	pages 29 and 30
E1-5 Energy consumption and mix	GRI 302-1 Energy consumption within the organization GRI 302-2 Energy consumption outside the organization GRI 302-3 Energy intensity GRI 302-4 Reduction of energy consumption GRI 302-5 Reductions in energy requirements of products and services	pages 27, 31, 32
E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	GRI 305-1 Direct (Scope 1) GHG Emissions GRI 305-2 Energy Indirect (Scope 2) GHG Emissions GRI 305-3 Other indirect (Scope 3) GHG Emissions GRI 305-4 GHG Emissions Intensity	pages 27, 31, 32
E1-7 GHG removals and GHG mitigation projects financed through carbon credits	GRI 3-3 Topic Management GRI 305-5 Reduction of GHG Emissions	n/a
E1-8 Internal carbon pricing	-	n/a
E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	GRI 201-2 Financial implications and other risks and opportunities due to climate change	n/a

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	-	pages 23, 24, 33
E5-1 Policies related to resource use and circular economy	GRI 3-3 Topic Management	page 34
E5-2 Actions and resources related to resource use and circular economy	GRI 3-3 Topic Management GRI 306-2 Management of significant waste-related impacts	pages 34, 35, 36
E5-3 Targets related to resource use and circular economy	GRI 3-3 Topic Management	page 36
E5-4 Resource inflows	-	pages 33 and 36
E5-5 Resource outflows	GRI 306-1 Waste generation and significant waste-related impacts GRI 306-2 Management of significant waste-related impacts GRI 306-3 Waste generated GRI 306-4 Waste diverted from disposal GRI 306-5 Waste directed to disposal	pages 33 and 36
E5-6 Potential financial effects from resource use and circular economy-related impacts, risks and opportunities	-	n/a
ESRS S1: Own workforce		
SBM-2 Interests and views of stakeholders	GRI 403-4 Worker participation, consultation, and communication on occupational health and safety GRI 403-5 Worker training on occupational health and safety GRI 403-6 Promotion of worker health	page 38
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	GRI 403-4 Worker participation, consultation, and communication on occupational health and safety GRI 403-5 Worker training on occupational health and safety GRI 403-6 Promotion of worker health	pages 37, 38, 39, 43
S1-1 Policies related to own workforce	GRI 2-23 Policy commitments; GRI 2-25 Processes to remediate negative impact GRI 2-29 Approach to stakeholder engagement GRI 3-3 Topic Management GRI 403-1 Occupational health and safety management system GRI 403-3 Occupational health services GRI 403-4 Worker participation, consultation, and communication on occupational health and safety GRI 403-5 Worker training on occupational health and safety GRI 403-6 Promotion of worker health GRI 404-2 Programs for upgrading employee skills and transition assistance programs	pages 37, 38, 39, 43

CSRD Disclosures	Corresponding GRI Disclosures	Page
S1-2 Processes for engaging with own workers and workers' representatives about impacts	GRI 2-29 Approach to stakeholder engagement GRI 3-3 Topic Management GRI 403-4 Worker participation, consultation, and communication on occupational health and safety GRI 403-5 Worker training on occupational health and safety GRI 403-6 Promotion of worker health	page 38
S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns	GRI 2-25 Processes to remediate negative impact GRI 2-26 Mechanisms for seeking advice and raising concerns GRI 403-2 Hazard identification, risk assessment, and incident investigation GRI 403-4 Worker participation, consultation, and communication on occupational health and safety GRI 403-5 Worker training on occupational health and safety GRI 403-6 Promotion of worker health	page 71
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 Embedding policy commitments GRI 3-3 Topic Management GRI 203-2 Significant indirect economic impacts GRI 403-4 Worker participation, consultation, and communication on occupational health and safety GRI 403-5 Worker training on occupational health and safety GRI 403-6 Promotion of worker health GRI 403-9 Work-related injuries GRI 403-10 Work-related ill health	pages 40, 41, 44, 45, 46, 47, 50, 51, 52, 53
S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	GRI 3-3 Topic Management GRI 403-4 Worker participation, consultation, and communication on occupational health and safety GRI 403-5 Worker training on occupational health and safety GRI 403-6 Promotion of worker health	pages 42, 46, 47, 51
S1-6 Characteristics of the undertaking's employees	GRI 2-7 Employees GRI 405-1 Diversity of governance bodies and employees	page 53
S1-7 Characteristics of non-employees in undertaking's own workforce	GRI 2-8 Workers who are not employees	n/a
S1-8 Collective bargaining coverage and social dialogue	GRI 2-30 Collective bargaining agreements	n/a
S1-9 Diversity metrics	GRI 405-1 Diversity of governance bodies and employees	pages 47 and 48
S1-10 Adequate wages	-	page 52
S1-11 Social protection	-	page 40

CSRD Disclosures	Corresponding GRI Disclosures	Page
S1-12 Persons with disabilities	GRI 405-1 Diversity of governance bodies and employees	pages 47 and 48
S1-13 Training and skills development metrics	GRI 403-5 Worker training on occupational health and safety GRI 404-1 Average hours of training per year per employee GRI 404-3 Percentage of employees receiving regular performance and career development reviews	page 51
S1-14 Health and safety metrics	GRI 403-4 Worker participation, consultation, and communication on occupational health and safety GRI 403-5 Worker training on occupational health and safety GRI 403-6 Promotion of worker health GRI 403-8 Workers covered by an occupational health and safety management system GRI 403-9 Work-related injuries GRI 403-10 Work-related ill health	page 43
S1-15 Work-life balance metrics	-	page 43
S1-16 Remuneration metrics (pay gap and total remuneration)	GRI 2-21 Annual total compensation ratio GRI 405-2 Ratio of basic salary and remuneration of women to men	page 52
S1-17 Incidents, complaints and severe human rights impacts	GRI 2-27 Compliance with laws and regulations GRI 3-3 Topic Management GRI 406-1 Incidents of discrimination and corrective actions taken	page 48
ESRS S2: Workers in the value chain		
SBM-2 Interests and views of stakeholders	Entity specific GRI topic: Sustainable Supply Chains	page 54
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	GRI 3-3 Topic Management; Entity specific GRI topic: Sustainable Supply Chains	page 54
S2-1 Policies related to value chain workers	GRI 2-23 Policy commitments GRI 2-25 Processes to remediate negative impact GRI 2-29 Approach to stakeholder engagement GRI 3-3 Topic Management; Entity specific GRI topic: Sustainable Supply Chains	page 55
S2-2 Processes for engaging with value chain workers about impacts	GRI 2-29 Approach to stakeholder engagement GRI 3-3 Topic Management Entity specific GRI topic: Sustainable Supply Chains	n/a
S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns	GRI 2-25 Processes to remediate negative impact GRI 2-26 Mechanisms for seeking advice and raising concerns Entity specific GRI topic: Sustainable Supply Chains	page 55

CSRD Disclosures	Corresponding GRI Disclosures	Page
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 Embedding policy commitments GRI 2-25 Processes to remediate negative impact GRI 3-3 Topic Management GRI 203-2 Significant indirect economic impacts GRI 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships Entity specific GRI topic: Sustainable Supply Chains	page 55
S2-5 Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities	GRI 3-3 Topic Management Entity specific GRI topic: Sustainable Supply Chains	n/a
ESRS S4: Consumers and end-users		
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	GRI 3-3 Topic Management GRI 416-1 Assessment of the health and safety impacts of product and service categories Entity specific GRI topic: Local communities	page 56
S4-1 Policies related to consumers and end-users	GRI 2-23 Policy commitments GRI 2-25 Processes to remediate negative impact GRI 2-29 Approach to stakeholder engagement GRI 3-3 Topic Management GRI 416-1 Assessment of the health and safety impacts of product and service categories Entity specific GRI topic: Local communities	page 56
S4-2 Processes for engaging with consumers and end-users about impacts	GRI 2-29 Approach to stakeholder engagement GRI 3-3 Topic Management GRI 416-1 Assessment of the health and safety impacts of product and service categories Entity specific GRI topic: Local communities	page 56
S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	GRI 2-25 Processes to remediate negative impact GRI 2-26 Mechanisms for seeking advice and raising concerns GRI 416-1 Assessment of the health and safety impacts of product and service categories GRI 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data Entity specific GRI topic: Local communities	page 65
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 Embedding policy commitments GRI 2-25 Processes to remediate negative impact GRI 203-2 Significant indirect economic impacts GRI 3-3 Topic Management GRI 416-1 Assessment of the health and safety impacts of product and service categories GRI 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services GRI 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data Entity specific GRI topic: Local communities	pages 57, 58, 59, 60, 61, 62, 64, 65
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 Topic Management GRI 416-1 Assessment of the health and safety impacts of product and service categories Entity specific GRI topic: Local communities	pages 57, 58, 61, 65

CSRD Disclosures	Corresponding GRI Disclosures	Page
ESRS G1: Business conduct		
GOV-1 The role of the administrative, supervisory and management bodies	GRI 2-12 Role of the highest governance body in overseeing the management of impacts GRI 2-28 Membership in associations	pages 17, 18, 19, 20
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	GRI 2-28 Membership in associations	page 69
G1-1 Business conduct policies and corporate culture	GRI 2-16 Communication of critical concerns GRI 2-23 Policy commitments GRI 2-24 Embedding policy commitments GRI 2-26 Mechanisms for seeking advice and raising concerns GRI 2-28 Membership in associations GRI 3-3 Topic Management	pages 69, 70, 71
G1-2 Management of relationships with suppliers	GRI 2-28 Membership in associations	pages 69, 70, 72
G1-3 Prevention and detection of corruption and bribery	GRI 2-13 Delegation of responsibility for managing impacts GRI 2-16 Communication of critical concerns GRI 2-28 Membership in associations GRI 3-3 Topic Management GRI 205-1 Operations assessed for risks related to corruption procedures GRI 205-2 Communication and training about anti-corruption policies and procedures	pages 69, 70, 71
G1-4 Incidents of corruption or bribery	GRI 2-27 Compliance with laws and regulations GRI 2-28 Membership in associations GRI 3-3 Topic Management GRI 205-3 Confirmed incidents of corruption and actions taken	page 70
G1-5 Political influence and lobbying activities	GRI 2-28 Membership in associations	n/a
G1-6 Payment practices	GRI 2-28 Membership in associations	page 72

CSRD Disclosures	Corresponding GRI Disclosures	Page
	Other	
-	GRI 2-15 Conflicts of interest	page 72
-	GRI 2-18 Evaluation of the performance of the highest governance body	n/a
-	GRI 201-1 Direct economic value generated and distributed	page 73
-	GRI 201-3 Defined benefit plan obligations and other retirement plans	page 53
-	GRI 201-4 Financial assistance received from government	page 73
-	GRI 203-1 Infrastructure investments and services supported	pages 57, 58, 59
-	GRI 305-6 Emissions of ozone-depleting substances (ODS)	n/a
-	GRI 305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	n/a
Entity specific topic: Cybersecurity	Cybersecurity (and Critical infrastrucure)	pages 66, 67, 68

Sources of estimation and outcome uncertainty

Our approach to calculating and reporting sustainability metrics is outlined in the relevant sections of this report. These metrics are gathered from our local data collection systems, drawing from sources such as direct measurements and calculations, or estimations. Robust controls ensure the completeness and accuracy of the reported information.

When presenting quantitative indicators, estimates and assumptions were used in cases where directly measurable data was not available. As a result, some indicators may be subject to certain degrees of measurement uncertainty. Yettel Bulgaria will continue to make every effort in the coming periods to establish reliable methods for obtaining this information.

We regularly review and update our estimates and underlying assumptions in response to operational experience, evolving ESG reporting standards, and improved supplier data. We apply changes in the reporting period in which they occur and explain them in the notes for the relevant metrics. Methodologies used for estimates are described in the respective chapters of this report.