SUSTAINABILITY
REPORT 2023–24

EMPOWERING TOMORROW RESPONSIBLY ESG,
EVOLVED: PTCL ELEVATING ESG LOCALLY

| ABOUT THIS REPORT

Prepared in reference to GRI Standards (2021), this report marks PTCL Group's first structured sustainability disclosure serving as a foundational step toward refined ESG disclosures.

MESSAGE FROM THE P&GCEO

At PTCL Group, we believe that sustainability is not just a responsibility but an opportunity to shape a future that is inclusive, resilient, and purpose-driven. The year 2025 will mark a defining moment in our sustainability journey, one in which we lay the foundation for long-term ESG goals, particularly our 2030 vision. This vision is underpinned by the development of a self-driven, independent sustainability management system that will embed accountability, innovation, and continuous improvement across all levels of our organization.

We are also deeply committed to aligning our practices with evolving regulatory requirements for sustainability reporting, ensuring transparency, integrity, and a steadfast commitment to both local and global standards. Our goal is clear, not only to comply, but to lead in Pakistan's sustainability landscape, setting an example through responsible governance.

This report for 2023–2024 reflects our continued progress across the ESG spectrum, highlighting the tangible impact of our efforts on both society and business transformation. On the social front, initiatives like the Dil Se Ba-Ikhtiar Program have empowered underprivileged women through targeted support and capacity building. In parallel, we are driving digital transformation across our business functions, including the digitalization of our supply chain management, ensuring greater efficiency, resilience, and transparency.

Our commitment to sustainability extends into every aspect of our operations. We have transitioned from basic regulatory compliance to a robust Ethics & Compliance (E&C) program, grounded in a risk-based governance framework aligned with global best practices.

Recognizing the urgency of climate action, we continue to invest in solutions such as solar energy and AI integration to reduce our environmental footprint and accelerate the shift toward a low-carbon future. At the heart of our progress are our people, and our diversity and inclusion initiatives remain key to building a culture that celebrates differences and fosters a sense of belonging.

We are proud of the progress we have made, yet we know this is only the beginning. The years ahead will demand even greater collaboration, innovation, and a relentless focus on delivering impact. Together, we will continue to push boundaries, raise the bar, and redefine what it means to be a responsible corporate citizen in today's rapidly changing world.

HATEM BAMATRAF
President & Group CEO

MESSAGE FROM THE GROUP CHIEF PEOPLE OFFICER

PEOPLE-POWERED SUSTAINABILITY AT PTCL GROUP

At PTCL Group, our people are at the heart of our sustainable growth. We are committed to building a resilient, inclusive, and future-ready workforce empowered by well-being, continuous learning, and a winning culture deeply rooted in our Group Corporate Values.

We are fostering sustainability in our culture and operations through ongoing initiatives like Green Friday, where our people work from home every Friday to reduce energy consumption and lower our carbon footprint. Alongside this, our shift to a paperless environment and ongoing awareness campaigns are driving more sustainable practices across the organization.

Inclusion remains a key priority. Through initiatives like the Justuju Trainee Program for Persons with Disabilities, we support diverse talent across all backgrounds. We are also focused on increasing women's representation at all levels to help more women thrive professionally and achieve financial independence.

Our expanded well-being programs provide broader healthcare support, mental health awareness, and flexible work arrangements that foster balance and productivity. Meanwhile, our robust learning ecosystem drives continuous growth through advanced digital training, leadership development, and building future-critical capabilities. We also prioritize employee voices, fostering regular engagement and transparent communication to stay agile, accountable, and aligned with our teams' evolving needs.

As we progress, our People & Organization strategy will drive purposeful growth and embed sustainability across every employee experience. Rooted in PTCL Group's core values, **"Be Resilient, Think Big, Win Every Battle, and Value Success"**, we empower our people to champion a winning culture and deliver lasting impact for PTCL Group and beyond.

UMER FARID
Group Cheif People Officer

IN CONVERSATION WITH GROUP VP CORPORATE HSE & SUSTAINABILITY

Q1: Sustainability has been a part of PTCL Group's agenda for years, but this report mentions a major shift in how it is being approached. What changed?

Sustainability has always been a part of PTCL Group's ethos. Various departments have undertaken meaningful initiatives over the years. But what changed in this reporting cycle is that we finally put structure around those efforts. For the first time, we launched a formal data collection process across the organization, guided by globally recognized standards. It wasn't easy, it required intense coordination, and it took time, but it was a tiring yet transformative milestone.

We also developed KPI matrices for each material topic, which was something entirely new for the organization. To ensure alignment, we conducted one-on-one sessions with each domain's VP or Director, walking them through the expectations and helping them understand the reporting structure specific to their area. So yes, a lot has been done before but this year, we set the framework and discipline that future ESG reporting can now build on.

Q2: You mentioned laying the foundation. What do you see as the next step now that the base has been set?

Now that the structure is in place, our focus is to ensure that sustainability becomes a part of the system not something dependent on individuals. We are currently working on developing a proper sustainability management system, something that is process-driven, self-sustaining, and integrated into our operational governance.

MUHAMMAD TAIMOOR KHAN
Group Vice President Corporate HSE & Sustainability

This shift from people-dependency to process-dependency is what will make ESG a permanent pillar of our business.

Q3: This report highlights 2025 as a turning point. Why is this year so significant?

Because 2025 is where several strategic developments converge. We are in the process of defining our long-term sustainability goals for 2030, structured around six key pillars. At the same time, we're preparing ourselves for the regulatory requirements coming into play in Pakistan, and we've initiated alignment with IFRS sustainability disclosure standards. This year is not just about reporting what we've done, it's about building what comes next.

Q4: PTCL Group is part of a larger entity under e & Group. How does that influence your sustainability direction?

Being part of the e& Group definitely brings strategic guidance and a roadmap that all operating companies are expected to align with. From 2025 onward, we anticipate more focused ESG directives from the Group especially around waste management, circularity, water consumption, and environmental compliance. It's a welcome challenge because it pushes us to raise our own standards and helps us mature as an ESG-conscious company, not just within Pakistan, but as part of a global ecosystem.

Q5: For organizations still early in their ESG journey, what's one lesson you'd share based on PTCL Group's experience?

Start with structure even if it's simple. In our case, aligning with recognized standards like GRI, developing department-level KPIs, and building internal understanding were the game changers. Once you create a common language around ESG internally, momentum follows. You can't manage what you don't define, and you can't report what you don't measure.

ABOUT PTCL GROUP

Pakistan Telecommunication Company Limited (PTCL) stands as Pakistan's premier integrated Information and Communication Technology (ICT) service provider. With a legacy spanning decades, PTCL Group has been instrumental in shaping the nation's digital landscape, offering a diverse portfolio that includes fixed-line telephony, broadband internet, digital television, and advanced ICT solutions.

Guided by its vision "To be the leading and most admired Telecom and ICT provider in and for Pakistan," PTCL Group is committed to delivering innovative services that cater to the evolving needs of its customers. The company's mission emphasizes becoming the partner of choice for customers, fostering the development of its people, and delivering value to shareholders.

PTCL Group's brand philosophy, encapsulated in the slogan "Hello to the Future," reflects its dedication to embracing change and driving digital transformation across the country. This forward-looking approach is underpinned by core values such as innovation, customer-centricity, and a commitment to excellence.

In recognition of its strategic initiatives and commitment to excellence, PTCL Group was honored with the 'Best Business Strategy and Expansion' award at the SAMENA LEAD Awards 2024. This accolade underscores the company's effective strategies in navigating the dynamic telecom landscape and its efforts in expanding its market presence.

Furthermore, PTCL Group's dedication to fostering an inclusive workplace has been acknowledged through the 'Diamond Award' for commitment to Women Empowerment and Gender Equality, as well as the 'Disability Inclusion Excellence Award' for 2023–2024. These honors reflect the company's ongoing efforts to promote diversity and inclusion within its organizational culture.

As PTCL Group continues to evolve, it remains steadfast in its commitment to driving sustainable growth, enhancing customer experiences, and contributing positively to Pakistan's socio-economic development.
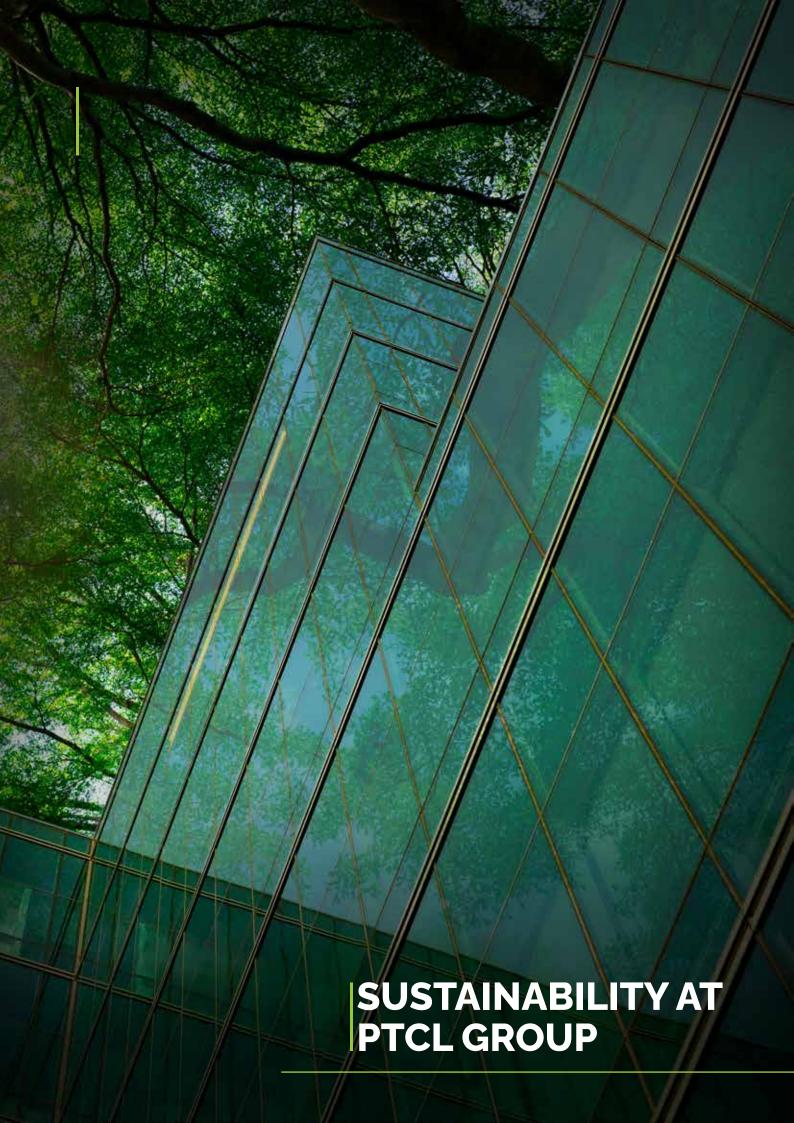
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SUSTAINABILITY AT PTCL GROUP

At PTCL Group, sustainability is steadily evolving from a set of standalone initiatives into a more structured and organization-wide commitment. While our journey is still in its early stages, we are consciously moving toward maturity, learning, adapting, and building the internal capacity required to embed sustainability into our business decisions and stakeholder engagements.

Over the past few years, our efforts have been exploratory, focused on developing a shared understanding of what sustainability means within the context of a telecom and ICT services provider in Pakistan. With each passing year, our clarity has improved and 2025 marks a pivotal point in this journey.

ESG AT PTCL GROUP

Sustainability governance at PTCL Group is currently evolving through a mix of dedicated roles, senior leadership involvement, and cross-functional collaboration. While a formal ESG governance framework is still under development, key structures are already in place to provide direction and oversight.

The HSE and Sustainability Department serves as the core unit responsible for driving sustainability initiatives. It is led by a Vice President (VP) who oversees both HSE and Sustainability domains. Under the sustainability function, a Senior Manager has been appointed to lead the portfolio independently, overseeing ESG reporting, data management, and stakeholder engagement across the organization.
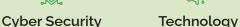
The VP reports directly to the Chief Human Resource Officer (CHRO), ensuring that sustainability remains aligned with broader people and culture strategies. At the strategic level, PTCL Group has established a Sustainability Steering Committee, chaired by the Group CEO (GCEO), which convenes on a quarterly basis to review progress, provide direction, and elevate sustainability within the Group's leadership agenda.

In 2025, PTCL Group formally initiated the development of a structured ESG governance framework, aimed at establishing clear roles, reporting lines, and processes that will further strengthen accountability and maturity in our sustainability   approach.

Corporate Functions (Enabling ESG Execution)

Various corporate departments play a key role in enabling ESG implementation across the organization, including:

Cyber Security

Technology

Procurement

Finance

Brands & Corporate Communication

People & Organization (P&O)

Corporate Compliance

Group Sustainability Function

The Group Sustainability Function operates under the HSE & Sustainability Department and is led by the Vice President, Sustainability. The function is supported by a Senior Manager, Sustainability, who independently manages the development and execution of the ESG strategy, ESG reporting, and cross-functional integration across PTCL Group. This team serves as the central coordinating hub for all sustainability-related initiatives.

Sustainability Steering Committee (SteerCo)

The Sustainability Steering Committee comprises all Chiefs across the PTCL Group, making it a cross-functional strategic body. It serves as a platform to align on key ESG priorities, gather feedback, and secure leadership buy-in for proposed initiatives. The Vice President, Sustainability reports directly to the committee on all sustainability-related progress and matters.

Group CEO (GCEO)

The Group CEO chairs the Sustainability Steering Committee, offering strategic guidance and oversight for PTCL Group's ESG agenda. This leadership role ensures that sustainability remains integrated into executive decision-making and is prioritized as a key driver in the Group's long-term vision and goals.

OUR APPROACH TO SUSTAINABILITY

At PTCL Group, we view sustainability as an evolving discipline-one that must continuously adapt to emerging risks, stakeholder expectations, and our role within the broader national and global landscape. Our approach is shaped by the belief that long-term value creation requires not just action, but structure, accountability, and cross-functional integration.

In recent years, we have taken meaningful steps toward institutionalizing sustainability as a core business priority. Rather than treating it as a collection of standalone initiatives, we are embedding it into how we plan, measure, and engage. This shift involves defining material topics more clearly, improving how we manage data, and building internal understanding across all levels of the organization.

To provide direction and long-term vision, we are introducing a unified sustainability framework anchored in seven strategic pillars, with defined goals and performance targets that will guide PTCL Group through to 2030. These pillars are being cascaded across relevant functions and business domains, ensuring ownership and operational alignment.

In parallel, we are strengthening our internal readiness to align with evolving regulatory expectations, including global frameworks such as the IFRS Sustainability Disclosure Standards (S1 and S2). These efforts reflect our intent to report with the same discipline we apply to financial disclosures, and to contribute meaningfully to Pakistan's sustainability transition.

OUR SUSTAINABILITY JOURNEY

2022

Initial awareness and scattered sustainability initiatives under HSE and CSR

2023

Sustainability grouped under HSE & Sustainability; VP Sustainability appointed; SteerCo concept introduced

2024

Senior Manager – Sustainability hired to independently lead ESG coordination

Launch of first structured, cross-functional data collection aligned with global standards

2025

• Definition of 7 Sustainability Pillars to anchor long-term ESG direction
• Initiation of 2030 ESG goals development across business functions
• Start of internal preparations for IFRS S1 & S2 alignment to meet future disclosure regulations

DEFINING WHAT MATTERS: OUR MATERIAL TOPICS

As part of this evolution, we also sought to identify the issues that matter most to our business and our stakeholders. We recognize that material topics form the backbone of responsible reporting, helping us focus on the areas where PTCL Group has the greatest impact and where expectations for action are highest.

Our initial materiality process was designed to be practical and inclusive. It brought together perspectives from multiple departments through structured questionnaires, aligning their insights with GRI topic areas. This approach helped us prioritize topics not just by compliance, but by relevance to our business performance, risk exposure, and stakeholder trust.

This materiality process served two purposes:
- It guided the selection of topics disclosed in this report, and
- It helped shape our internal sustainability roadmap for the coming years.

MATERIAL TOPICS: OUR FOCUS AREAS FOR SUSTAINABLE IMPACT

As part of our materiality assessment, PTCL Group has identified a focused set of sustainability topics that represent a blend of industry relevance, internal strategic priorities, and stakeholder interest. To bring structure and clarity to our ESG approach, we have grouped these topics under three overarching themes, each representing a core dimension of our sustainability impact. In doing so, we have also mapped each topic to the relevant United Nations Sustainable Development Goals (SDGs), reinforcing our alignment with global development priorities. The SDG alignment is visually represented in the accompanying infographic.

Managing Environmental Footprint	Creating Social Impact	Operating Responsibly
Energy	Occupational Health & Safety	Economic Performance
Emissions	Talent Attraction & Retention	Responsible Procurement Practices
Waste Management & Circularity	Training & Education	Anti-Corruption
	Diversity & Equal Opportunity	Cyber Security
	Community Engagement	Digital Access & Inclusion

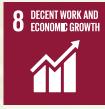| 7 AFFORDABLE AND CLEAN ENERGY	13 CLIMATE ACTION	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	11 SUSTAINABLE CITIES AND COMMUNITIES	3 GOOD HEALTH AND WELL-BEING
6 CLEAN WATER AND SANITATION	14 BELOW WATER	15 LIFE ON LAND	1 NO POVERTY	5 GENDER EQUALITY
4 QUALITY EDUCATION	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	8 DECENT WORK AND ECONOMIC GROWTH	6 PEACE, JUSTICE AND STRONG INSTITUTIONS	10 REDUCED INEQUALITES

MANAGING ENVIRONMENTAL FOOTPRINT

|ENERGY

Why is this topic material to PTCL Group?

As one of the largest telecom operators in Pakistan, PTCL Group's nationwide network infrastructure including data centres, exchanges, and mobile towers demands continuous and significant energy consumption. Energy is thus a material issue not only because of its operational importance but also due to its economic and environmental implications. Rising fuel and electricity prices, increased grid instability, and the mounting pressure to decarbonize have made efficient energy management critical to PTCL Group's long-term resilience.

Moreover, as sustainability expectations rise globally and within Pakistan, managing energy consumption responsibly contributes directly to reducing our environmental footprint. Under our broader environmental commitment, energy efficiency serves as a strategic lever to improve service reliability, cut emissions, and transition toward greener operations across both PTCL and Ufone networks.

Management Approach

Energy consumption at PTCL Group is managed collaboratively by the Strategy & Transformation and Network Operations teams. Annual budgeting incorporates fuel and electricity planning, while performance monitoring is gradually evolving to include efficiency benchmarks and project-level tracking of energy interventions. Growing investments in renewables and energy optimization systems reflect a clear shift toward structured and accountable energy management.

Advancing Renewable Energy & Smarter Consumption

In recent years, PTCL Group has accelerated efforts to integrate renewable energy across its operational footprint. These efforts are transforming the way energy is sourced, stored, and utilized particularly through solar energy systems paired with advanced battery storage and smart load management.

In 2024, PTCL Group deployed:

- 2.1 MW of large-scale solar capacity across 27 network sites.

- In parallel, an additional 368 kW of solar panels along with 20,000 Ah of lithium-ion battery storage were installed at 50 radio tower locations.

- These combined installations now contribute over 3.5 million kilowatt-hours annually, directly offsetting grid and diesel-based power usage.

Looking ahead to 2025, the Group plans to expand solar integration with an additional 2 MW capacity at eight major sites. A further rollout to 450 radio sites is underway, featuring solar arrays supported by 220,000 Ah of lithium battery systems. These steps reflect PTCL Group's growing ambition to reduce reliance on fossil fuels while improving operational stability in areas prone to load shedding.

Complementing these hardware upgrades, t has also adopted intelligent

software systems that shift energy load to off-peak times. These systems help manage power draw dynamically and avoid system stress, contributing to both cost efficiency and reduced carbon output.

Alignment with National Energy Priorities

PTCL Group's renewable energy journey is closely aligned with Pakistan's national sustainability agenda. With over nine hours of sunlight daily and recent hikes in grid electricity tariffs, solar energy is becoming an economically and environmentally sound solution. Pakistan has emerged among the world's top six countries in solar growth by early 2025. PTCL Group's investments in clean energy not only align with these trends but also position the company as a contributor to national energy resilience.

ENERGY PORTFOLIO:

Items				
	Purchased Electricity	Renewable Electricity (On Site Generation)	Fuel - Stationary (Petrol/Diesel)	Fuel - Mobile (Petrol/Diesel)
	kWh		Litres	
2024 PTCL	178,421,169	9,296,081	6,382,161	2,441,540
2024 Ufone	236,647,053	5,869,520	17,259,913	152,030
2024 Total	415,068,222	15,165,600	23,642,074	2,593,569
2023 PTCL	188,929,128	7,948,988	6,703,170	2,810,931
2023 Ufone	235,233,204	5,737,346	19,793,900	166,546
2023 Total	424,162,332	13,686,334	26,497,071	2,977,477
2022 PTCL	178,856,711	7,703,328	7,218,993	2,621,886
2022 Ufone	229,326,855	5,456,352	21,864,244	212,897
2022 Total	408,183,566	13,159,680	29,083,237	2,834,783

Between 2022 and 2024, PTCL Group recorded a gradual increase in renewable electricity generation, rising from 13.2 million kWh to 15.2 million kWh, reflecting continued investment in cleaner energy sources. Group also made measurable progress in reducing overall fuel consumption, with combined diesel and petrol use (both stationary and mobile) declining from 31.9 million Liters in 2022 to 26.2 million Liters in 2024. This reduction marks a positive shift toward energy efficiency and lower dependence on fossil fuels across both fixed and mobile operations.

GREEN HOUSE GAS EMISSIONS

Why is this topic material to PTCL Group?

Greenhouse gas (GHG) emissions are a critical driver of climate change, contributing to rising global temperatures, extreme weather events, and widespread environmental disruption. For Pakistan, a country ranked among the most climate-vulnerable nations despite contributing less than 1% to global emissions, the impact of unchecked carbon output is especially dire. From prolonged droughts to intensified floods, the climate crisis poses growing risks to both communities and infrastructure.

As a large telecom operator with a significant physical footprint, PTCL Group contributes to direct (Scope 1) and indirect (Scope 2) emissions, primarily through fuel combustion and electricity use. Reducing emissions is therefore a material responsibility, not only to mitigate environmental risks but also to align with national and global decarbonization efforts. Moreover, as investor and regulatory expectations intensify, emissions transparency has become a cornerstone of responsible business practice.

Management Approach

PTCL Group's approach to managing its carbon footprint is driven by a combination of internal initiatives and strategic alignment with the e& Group's broader climate goals. Monthly tracking of fuel and electricity consumption forms the basis of Scope 1 and 2 emissions monitoring, while insights are reported regularly as part of the Group's Climate Action reporting framework.

The carbon reduction agenda is operationalized through close collaboration between PTCL Group's Technology and Sustainability teams. The Technology team leads on emissions-reduction measures such as energy-efficient infrastructure upgrades and renewable energy deployments while the Sustainability function ensures alignment with reporting standards and long-term planning. All climate-related commitments are reviewed and approved through a formal governance structure, including validation by department-level CXOs, PTCL Group's internal Sustainability Committee, and the Group CEO.

e& Group's strong climate commitments act as a major catalyst for PTCL Group's emissions journey. As the parent organization, e& provides clear direction on environmental targets, data management, and capacity building across all OpCos. This top-down push has helped instill a growing sense of urgency and structure around climate action within PTCL Group.

Decarbonization Strategy: Energy-Led Emission Reduction

While PTCL Group has not yet announced public emissions-reduction targets, it has adopted a practical approach to decarbonization centered on two key levers: energy efficiency and renewable energy adoption. Upgrades to hardware and power systems, solar-based diversification, and digital tools for load management have all contributed to reducing reliance on diesel generators

and grid electricity, especially in off-grid or volatile power areas.

That said, there remains considerable opportunity to strengthen and diversify PTCL Group's decarbonization approach. Expanding to include formal emission baselines, target-setting, carbon accounting frameworks, and third-party validation will be critical to deepening climate accountability in the years ahead.

GHG Emissions Planning & Forward Roadmap

In collaboration with the e& Group, PTCL Group is now entering a more advanced phase of emissions management, laying the groundwork for structured GHG accounting, assurance, and reporting across the organization.

Key milestones of this roadmap include:

- GHG Re-Baselining (2022–2024): PTCL Group is actively contributing to the Group-wide effort to establish a refreshed baseline for Scope 1, Scope 2, and Scope 3 emissions across all OpCos. This exercise will help define a clear emissions footprint and support credible long-term target-setting.

- External Assurance for 2024: Preparations are underway to ensure that PTCL Group's Scope 1 and 2 emissions data for 2024 meet external assurance standards. This will significantly enhance transparency, boost stakeholder confidence, and align with international ESG reporting practices.

- GHG Data Reporting Tool Implementation: As part of e& Group's regional integration strategy, a new digital platform for emissions data reporting is under development. PTCL Group is currently in active coordination with e& to roll out this system, which will standardize emissions tracking, improve data integrity, and streamline future reporting cycles.

This forward-looking strategy represents a turning point in PTCL Group's environmental management maturity, moving beyond ad-hoc improvements toward a structured, data-driven emissions governance model.

GHG EMISSIONS OVERVIEW PTCL GROUP (2022–2024)

Emission Scope			
Scope 1	Scope 2	Scope 3	Total
tCO$_2$e			

Year		Scope 1	Scope 2	Scope 3	Total
2024	PTCL	41,320	70,601	204,775	316,696
	Ufone	53,472	93,641	99,967	247,080
	Total	94,792	164,242	304,742	563,777
2023	PTCL	38,607	74,230	298,086	410,924
	Ufone	61,085	92,423	133,274	286,782
	Total	99,693	166,653	431,360	697,706
2022	PTCL	34,435	70,273	183,628	288,335
	Ufone	67,101	90,103	66,282	223,486
	Total	101,536	160,375	249,910	511,821

Over the last three years, PTCL Group has made measurable progress in reducing its direct (Scope 1) emissions, reflecting a focused effort to cut fuel-related carbon output across the organization. While overall emissions fluctuated during this period, mainly due to changes in value chain-related (Scope 3) data, the Group maintained stable levels of indirect (Scope 2) emissions and continued to improve the accuracy of its reporting practices.

These trends highlight PTCL Group's growing emphasis on operational decarbonization and reinforce the importance of expanding its efforts to include value chain emissions. As data systems evolve and strategy matures, the Group remains committed to building a more transparent and accountable emissions profile.

WASTE MANAGEMENT AND CIRCULARITY

Why is this topic material to PTCL Group?

Responsible environmental stewardship is becoming increasingly significant across the telecom sector, especially as global expectations around circularity, biodiversity, and water management intensify. As part of the e& Group, PTCL Group acknowledges its role in contributing to the Group's overarching sustainability goals. While PTCL Group's operations have historically had limited exposure to waste generation processes, these areas are growing in relevance due to evolving global reporting standards and environmental risk considerations.

In this context, waste management has been identified as material topics to reflect PTCL Group's alignment with e& Group's long-term climate commitments and the importance of establishing foundational data and systems for future action.

Management Approach

In December 2024, e& Group announced a series of circularity and nature-related targets under its 2030 Climate Transition Plan. These include:

- Diverting 50% of operational waste from landfill

- Reducing e-waste by 20%

- Providing repair, recycling, and refurbishment services for customer devices

- Introducing OpCo-level KPIs for waste reuse and recycling

- Establishing water and biodiversity-related baselines

PTCL Group has begun aligning with these Group-wide ambitions by participating in the Circularity Baseline Assessment led by e&. PTCL Group submitted its first set of data on waste generation and disposal practices, which will inform the development of future KPIs and action plans. This includes contributing information on:

- Waste volumes and types (e.g., e-waste, general waste)

- End-of-life disposal methods (e.g., landfill, recycling)

- Existing practices related to repair, reuse, or inventory tracking

Simultaneously, PTCL Group has also initiated the process of sharing the data about potential biodiversity impacts, to support Group-level efforts in understanding environmental dependencies across all OpCos.

While PTCL Group is still in the early stages of action in these areas, this foundational work marks an important step toward long-term integration of circular economy principles and water stewardship into its operations.

CREATING
SOCIAL IMPACT

OCCUPATIONAL HEALTH AND SAFETY

Why is this topic material to PTCL Group?

Occupational Health and Safety (OHS) is of paramount importance to PTCL Group, as it ensures the well-being of employees, contractors, and other stakeholders who work in high-risk environments. Given PTCL's Group's extensive infrastructure across telecom networks, data centres, and field operations, OHS practices play a critical role in mitigating risks associated with work-related injuries, illnesses, and accidents. By prioritizing the health and safety of its workforce, PTCL Group not only ensures compliance with national and international health and safety regulations but also demonstrates its commitment to corporate responsibility. A robust OHS policy enhances employee morale and retention, reduces workplace accidents, and safeguards PTCL Group from potential legal and financial risks arising from workplace injuries or fatalities. Furthermore, the company's focus on OHS strengthens its reputation as a safe and reliable employer, which is increasingly important to both employees and external stakeholders.

Management Approach

PTCL Group has established a comprehensive OHS Policy that is enforced across its operations, ensuring a safe and healthy working environment for its employees. The management approach focuses on several key components:

1. Governance Structure

OHS within PTCL Group is led by the Corporate HSE and Sustainability Department. At the helm of this department is the Vice President, who reports directly to a CXO, ensuring executive-level oversight and alignment with PTCL Group's broader corporate strategy. Reporting to the Vice President is a structured team, including a Director, Zonal Heads (Senior Managers), Zonal Managers and Executives, who are responsible for implementing safety practices at the operational level. Functional Directors within each department also play a critical role in ensuring the operational integration of safety practices, providing liaison between their respective functions and the Corporate HSE team. This structured governance framework ensures that health and safety protocols are consistently enforced across all departments and that any issues or improvements are swiftly addressed at the appropriate level.

2. OHS Policy and Strategy

PTCL Group has a formal Health, Safety, and Environment (HSE) policy that outlines clear objectives and procedures for identifying and managing workplace risks. The policy is grounded in the principle that "HSE is everyone's responsibility and holds equal importance to all other business processes." It establishes accountability across all levels of the organization, including employees,

outsourced service providers, and contractors, by defining measurable goals and performance benchmarks for occupational health and safety.

3. Safety Performance & KPIs

PTCL Group monitors and evaluates its occupational health and safety performance through lagging indicators such as the Total Recordable Incident Rate (TRIR). TRIR in 2024 was 0.062, a 17% reduction from 2023 (0.075). PTCL Group is committed to continuous improvement and aims to further reduce these rates by strengthening preventive measures and fostering a culture of safety.

4. Employee Trainings & Engagement

PTCL Group is dedicated to embedding a strong culture of HSE awareness across all levels of the organization. Demonstrating this commitment, the company significantly increased its HSE training hours from 16,441 in 2023 to 44,307 in 2024. These efforts included a comprehensive range of activities such as safety observation tours, audits, inspections, surveys, digital training modules, and risk assessments. Each initiative is designed to enhance employee awareness, build capacity, and proactively mitigate workplace health and safety risks.

5. Incident Management & Emergency Response

PTCL Group has established comprehensive emergency procedures in line with ISO 45001 & ISO 14001 standards, ensuring a structured and effective response to potential emergencies. These protocols clearly define organizational roles and the sequence of actions to be taken, with the objective of minimizing human injury, safeguarding company assets, and preventing environmental degradation. This framework reflects PTCL Group's commitment to proactive Emergency Planning and Response as part of its integrated HSE management system.

INITIATIVES FOR ENHANCING SAFETY & EMPLOYEE WELL-BEING

In 2023 and 2024, PTCL Group undertook several key initiatives to enhance the safety and well-being of its employees, significantly contributing to its reputation and commitment to safety. Some notable initiatives include: both for employees and for external stakeholders.

1. Islamabad Traffic Police (ITP) - Defensive Driving Training:

Defensive Driving Training: PTCL Group collaborated with the Islamabad Traffic Police to conduct a Defensive Driving Training session for its employees. The session focused on road safety awareness and responsible driving behaviour, aiming to reduce the risk of traffic incidents. Key topics covered were safe driving techniques, hazard perception, traffic rules, the importance of seatbelt use, and speed management. The training involved practical demonstrations and interactive discussions, reinforcing PTCL Group's commitment to safer driving practices both on and off duty.

2. Atlas Honda Bike Simulation Training:

PTCL Group, partnering with Atlas Honda LTD, organized a Bike Simulation Training for employees who use motorcycles for official duties. The training utilized advanced simulation technology to enhance motorcycle riding competencies and promote road safety awareness. Key areas included safe riding practices, hazard perception, balance and control, adherence to traffic regulations, and emergency response techniques. This initiative aimed to minimize road-related risks, particularly for employees using motorcycles, and reinforced PTCL Group's safety culture across its workforce. PTCL Group continues to collaborate with external stakeholders, ensuring that its HSE practices remain aligned with the latest safety standards.

Through continuous collaboration, PTCL Group remains committed to advancing its HSE management and maintaining a culture of safety at every level of the organization.

AT A GLANCE

- **16,441 Hours** of safety training conducted in 2023

- **44,307 Hours** of safety training conducted in 2024

- **0.062 TRIR** (Total Recordable Incident Rate) for 2024

- **0.052 LTIR** (Lost Time Incident Rate) for 2024

MAJOR SAFETY INITIATIVES

- Defensive Driving Training with IST
- Atlas Honda Bike Simulation Training

Focus on reducing workplace incidents through continuous improvement

Our Performance	2022	2023	2024
Total number of health and safety training hours provided to employees.	22,384	16,441	44, 307
Number of recordable work-related injuries.	17	18	16

AWARDS AND RECOGNITION

PTCL Group earned top-level recognition at the 2023 Occupational Safety and Health (OSH) Awards, marking our second consecutive year of recognition. This achievement reflects our sustained commitment to fostering a safe, healthy, and resilient workplace anchored in strong HSE leadership, proactive risk management, and active employee participation across the organization. It stands as a collective accomplishment that reinforces PTCL Group's dedication to continuous improvement and operational excellence in health, safety, and sustainability.

Prioritizing Employee Health and Well-being

At PTCL Group, the well-being of our employees is not just a priority, it is a commitment. Our dedicated health initiative, Vitality Express, continues to serve as the cornerstone of workplace health engagement, enabling early detection, awareness, and education across the organization.

Vitality Drive: Health Risk Profiling (2023–2024)

Under the Vitality initiative, annual health profiling was conducted to screen employees for early indicators of non-communicable diseases. These assessments played a critical role in preventive healthcare, enabling timely interventions and promoting informed lifestyle choices.

Screening Reach

5,121
Employees Assessed in 2023

5,630
Employees Assessed in 2024

Cases		
Disease	**2023**	**2024**
Diabetes	370	518
Hypertension	391	719
Ischemic Heart Disease	23	45
Dyslipidemia	859	1,366

This data underscores the impact of routine checkups and highlights the increasing need for consistent health engagement, especially in combating lifestyle-related diseases.

Quarterly Awareness Themes

Each quarter of the year was structured around a focused health awareness theme, ensuring sustained engagement and education:

2023 Themes – "Healthy Heart" Series:

Q1: Healthy Heart & Exercise
Q2: Healthy Heart – Quit Tobacco
Q3: Healthy Heart & Diet
Q4: Healthy Heart – Manage Stress

2024 Themes – "Living with Diabetes" Series:

Q1: Diabetes & Diet
Q2: Understanding Pre-diabetes
Q3: Diabetes & Exercise
Q4: Life with Diabetes

These quarterly campaigns were carefully curated to address high-risk health areas identified through profiling. They equipped employees with practical tools, resources, and expert guidance to support proactive health management and informed decision-making.

Awareness Sessions and Participation

The awareness component of Vitality Express generated strong engagement across the organization through expert-led sessions, interactive discussions, and educational materials. This outreach reinforced the importance of regular health awareness, focusing on behaviour change, disease prevention, and early intervention.

Participation Overview:

Year	Sessions Conducted	Total Participants	Management	Non-Management
2023	621	9,927	1,799	8,128
2024	406	5,793	742	5,051

TALENT ATTRACTION AND RETENTION

Why is this topic material to PTCL Group?

At PTCL Group, we believe that attracting and retaining top talent is critical to delivering exceptional service, driving innovation, and achieving sustainable growth. As a leading telecom and ICT services provider, our ability to adapt and thrive depends on a motivated, engaged, and future-ready workforce. We are committed to creating an environment where employees feel valued, supported, and empowered to grow.

Management Approach

PTCL Group's employment policies emphasize long-term career growth and mobility, and ethical workplace practices. The company also prioritizes employee well-being through a comprehensive Health, Safety, and Environment (HSE) policy and benefits that exceed statutory requirements, fostering trust and loyalty.

Attraction and Onboarding

PTCL Group focuses on entry-level hirings reflecting our focus on inculcating youth an experienced professional from diverse educational and industry backgrounds. A structured onboarding program ensures that all new employees are integrated smoothly through knowledge-sharing sessions, formal orientation, and targeted training.

Employee Engagement

PTCL Group regularly engages its employees through several interventions and take their feedback via various channels, assessing and enhancing the employee experience through structured feedback channels such as the annual Employee Voices Survey. These surveys inform leadership decisions and culture-building efforts. PTCL Group's employee engagement score has shown consistent growth, reaching 74% in 2022 and 78% in both 2023 and 2024. To foster flexibility and work-life balance, PTCL Group introduced a Hybrid Work Model featuring "Green Fridays," where employees work from home once a week to reduce commute-related emissions.

Learning and Development

PTCL Group supports continuous employee development through regular capacity and capability of its employees. Average training hours per employee stood at: 6.11 hours in 2023, 6.15 hours in 2024. Employees benefit from both in-house training and leadership development initiatives, ensuring professional growth at all levels.

Employee-Centric Facilities

PTCL Group focuses on employee well-being through facilities such as:

- Transport services for employees to ease commuting

- Reserved parking spaces

- Extended Maternity & Paternity leaves reinforcing work-life balance

KPI	2022	2023	2024
Employee Headcount (#)	17,687	17,123	16,524
Employee Engagement Score (%)	74	78	78
Internal Talent Mobility Rate (%)	5	9	16
Avg. Learning Hours Per Employee	6.37	6.11	6.15
Management High Performer Retention Rate (%)	91	94	97
Post-Maternity Return Rate (%)	96	94	100

TRAINING & EDUCATION

Why is this topic material to PTCL Group?

PTCL Group recognizes capability building as a strategic imperative for sustaining long-term growth, elevating customer experience, and driving innovation. In an increasingly digital and fast-evolving landscape, continuous learning ensures the workforce remains future-ready with the skills, mindset, and capabilities required to address complex business challenges and contribute meaningfully to Pakistan's socio-economic progress.

Management Approach

PTCL Group has a structured Learning & Development Framework that guides all capability-building initiatives. It ensures employees at every level have access to strategically aligned development opportunities that enhance skills, performance, and leadership capacity. The framework emphasizes inclusive learning, robust processes, and continuous alignment with organizational goals.

Training Programs and Focus Areas

PTCL Group offers a diverse range of capability development initiatives encompassing both technical and non-technical skills. These include mandatory trainings, leadership programs, and functional and management interventions across the organization. The Group also maintains a strong focus on digital learning, complementing in-person development with scalable, on-demand learning opportunities. In parallel, structured HSE learning is delivered across business functions, supported by continuous HSE awareness through

multiple engagement channels.

introduced in 2023–2024 include:

Assessing Training Effectiveness

PTCL Group evaluates the effectiveness of its training programs through Learning Satisfaction Index (LSI) surveys and structured post-training feedback. Annual reviews and performance assessments ensure continuous alignment with evolving business needs and strategic priorities. Training completion records are systematically maintained to track participation and monitor progress across all learning initiatives.

Leadership Development & Key Initiatives

PTCL Group is committed to nurturing leadership capabilities and fostering a culture of innovation, inclusion, and continuous learning. Notable initiatives

Leadership Expectation Immersive Program

A high-impact, three-day, curated leadership development experience designed exclusively for PTCL Group's senior leaders. The program focuses on bringing PTCL Group's Leadership Expectations to life through immersive, insight-driven sessions centered on real behaviors, mindset shifts, and day-to-day leadership practices.

People Manager Toolkit

A two-day management development program aimed at empowering leaders with essential skills in talent acquisition, talent management, performance management, organizational design, and decision-making.

Support for Formal Education & Certification Programs

PTCL Group supports its employees in pursuing formal education and professional certifications, reinforcing the company's commitment to building a skilled and future-ready workforce. A total of 107 employees participated in formal education or certification programs, including:

- EMBA (LUMS) – Session 2021–2023: 6 participants

- MSc. (Thesis Completed): 29 participants (10 in 2023, 11 in 2024, 8 in 2025)

- FUEL Program (2021–2023): 32 participants

- Certifications – Emergency First Aid with CPR Training: 40 participants

This demonstrates PTCL's Group's commitment to advancing employee capabilities and supporting career growth across a range of disciplines.

LOOKING AHEAD: BUILDING A FUTURE-READY WORKFORCE

PTCL Group's approach to training and education is grounded in a belief that lifelong learning is critical for individual and organizational success. The company's inclusive and structured training framework ensures that employees at all levels are equipped with the skills needed to navigate industry challenges, embrace innovation, and deliver exceptional value to customers.

By fostering a culture of continuous learning, PTCL Group is not only strengthening its human capital but also contributing to the broader goal of building a resilient, future-ready workforce for Pakistan's digital future.

DIVERSITY & EQUAL OPPORTUNITY

Why is this topic material to PTCL Group?

At PTCL Group, DEI is not just a social responsibility but a highly strategic business imperative. Diversity is embedded in our DNA, reflected in our vast geographical presence and deeply varied customer base across Pakistan. This gives us both the opportunity and the responsibility to foster inclusion where every voice is heard and every individual is valued, respected and empowered with equal opportunities to learn, perform and grow. By integrating inclusion into our culture, leadership behaviours and people policies, we bring together diverse perspectives and lived experiences that strengthen our ability to fuel disruption, enhance collaboration and anticipate customer needs in a rapidly evolving digital landscape. DEI is therefore critical to PTCL Group's long-term sustainability, supporting our vision by building an inclusively resilient, future-ready organization that drives sustainable business growth.

Management Approach

PTCL Group upholds its commitment to DEI through a formal Diversity and Inclusion Charter and comprehensive policies on inclusion, anti-discrimination, and workplace harassment, ensuring fair and equitable access and opportunities for all employees. The Group systematically tracks DEI across multiple dimensions including, but not limited to, gender, age/generation, and persons with disabilities to strengthen representation, inform talent decisions, and guide targeted interventions. Through awareness and sensitization programs, leadership accountability, regular policy reviews, and continuous monitoring, we embed inclusion across the organization. Employees are actively engaged and provided with avenues to share their perspectives, ensuring every voice is heard, valued, and considered.

Diversity Profile at PTCL Group

PTCL Group's workforce reflects the organization's commitment to inclusion, with representation across various demographics:

- **Gender Diversity**

    a. Female employees make up 13.5% of the workforce. Gender balance is also maintained at leadership levels, with 196 female employees in positions L5 and above, underscoring efforts to promote equitable access to decision-making roles.

- **Persons with Disabilities (PWDs)**

    a. PTCL Group currently employees 92 persons with disability (PWDs), reflecting ongoing efforts to provide equitable opportunities and inclusive employment.

Key Diversity & Inclusion Initiatives:

PTCL Group has implemented several initiatives to drive diversity, equity, and inclusion across the organization, including:

Diversity and Inclusion Charter: A formal framework guiding PTCL Group's efforts to create a fair, inclusive, and equitable workplace.

JUSTUJU Internship Program: Our flagship internship program designed to provide career-launching opportunities for PWDs, promoting their social and economic inclusion through professional development, structured on-the-job training, and hands-on mentorship for career success.

Women Leadership Program: A program aimed at strengthening the female

leadership pipeline of PTCL Group, empowering women with opportunities to grow, lead, and shape the future of our business, our people, and our community.

DEI Sensitization Trainings: Conducted to raise awareness and deepen understanding of diversity, equity, and inclusion across the organization, and to enable employees to actively contribute to building a workplace where every individual feels valued, heard, and empowered.

Inclusive Hiring Practices: Gender-sensitive recruitment processes that address unconscious bias, with all job postings highlighting PTCL Group's commitment as an equal opportunity employer.

Daycare: Facility that provides a reliable, enriching, and inclusive childcare experience, supporting working mothers and promoting workplace inclusivity across PTCL Group.

Celebration of International Women's Day: Recognizing and honoring the contributions of women across the organization.

Women Returnship Program (Planned for 2025): Supporting women re-entering the workforce after career breaks.

Female Sales Trainee Program (Planned for 2025): Focused on empowering women in sales roles and promoting gender diversity in commercial functions.

Safeguarding Against Discrimination & Harassments

PTCL Group has implemented robust measures to prevent discrimination, harassment, and bias in the workplace, fostering a safe and respectful environment for all employees. Key measures include:

Anti-Harassment Awareness Sessions: Conducted regularly to educate employees on workplace ethics, appropriate conduct, and reporting mechanisms.

Meri Awaz Portal: A secure and confidential platform that allows employees to report incidents of discrimination or harassment without fear of retaliation.

Strict Policy Enforcement: PTCL Group maintains a zero-tolerance policy on harassment, ensuring that all complaints are addressed fairly, promptly, and transparently.

These measures underscore PTCL Group's commitment to upholding the highest standards of ethics, dignity, and respect across the organization.

Monitoring, Accountability, & Future Commitment

PTCL Group actively monitors and reports on the progress of its diversity and inclusion initiatives, with clear targets and goals in place to strengthen representation

and create a more equitable workplace. Looking ahead, PTCL Group remains committed to deepening its diversity and inclusion efforts, focusing on increasing the representation of women in leadership, enhancing accessibility for persons with disabilities, and fostering an environment where every employee feels valued, respected, and empowered to contribute their best.

KPI	2022	2023	2024
DEI Progress Index (%)	10	13	13.5
Women in Leadership (L5 & Above) (#)	172	180	196
Gender Pay Equity Ratio (%)	15	12	10
People of Determination (#)	99	99	92

COMMUNITY ENGAGEMENT

Why is this topic material to PTCL Group?

At PTCL Group, community engagement is more than philanthropy, it is a strategic pillar of our sustainability approach. With a nationwide presence, we recognize the responsibility to contribute meaningfully to the well-being of the communities we serve, especially in areas facing deep-rooted social and environmental challenges.

Through our social impact platform **Dil Se,** we focus on inclusive, scalable, and sustainable interventions that address critical issues such as access to clean water, gender equity, digital literacy, and disaster preparedness. These efforts go beyond short-term relief, they strengthen community resilience, promote social equity, and align with global sustainable development goals.

By investing in community-focused initiatives, PTCL Group not only supports national development priorities but also reinforces stakeholder trust and long-term business sustainability. Our commitment to uplifting communities reflects our belief that shared progress is the foundation of a connected and empowered Pakistan.

Dil Se Ba-Ikhtiar
Empowering Women Entrepreneurs for a Sustainable Tomorrow

As the flagship initiative under Tech4Inclusion, the Dil Se Ba-Ikhtiar Program reflects our vision for inclusive and sustainable socio economic development. Launched in Haripur in collaboration with the Pakistan Poverty Alleviation Fund (PPAF), the program equipped 100 semi-skilled women with digital tools, financial access, and entrepreneurial training to build home-based businesses. Participants received smartphones, free data access, e-commerce training, and mentorship, enabling them to sell products online and access microloans. Many have since scaled their businesses and gained national and international recognition. This initiative not only transformed individual livelihoods but also showcased a replicable model for digital and financial inclusion in underserved communities.

For details, check – Social Impact 2024

https://ptcl.com.pk/uploads/Social%20Impact%20Report%202024.pdf

Water Wells in Thar
Securing Basic Rights through Localized Water Solutions

Addressing one of the most critical sustainability challenges, access to clean water, we installed hand pumps across five underserved communities in Umerkot-Thar. These wells now provide safe drinking water to approximately 15,000 people, reducing the burden on women and children, enhancing school attendance, and enabling local economic activities. This intervention underscores our commitment to environmental justice and community well-being in water-stressed regions.

For details, check – Social Impact 2024

https://ptcl.com.pk/uploads/Social%20Impact%20Report%202024.pdf

E-Bikes for University Women
Advancing Gender Mobility and Climate Goals

To promote sustainable mobility and support female education, PTCL Group distributed e-bikes to women students at Rawalpindi Women's University. This initiative served dual purposes: enabling safe, independent commuting for young women and contributing to our green transport goals. It empowered recipients to overcome social and logistical mobility barriers, directly supporting gender equity and climate-conscious urban mobility.

For details, check – Social Impact 2024

https://ptcl.com.pk/uploads/Social%20Impact%20Report%202024.pdf

Safe Drinking Water for Flood-Affected Balochistan

In response to the devastating floods in Gwadar, we partnered with the Pakistan Red Crescent Society (PRCS) to deliver over 30,000 liters of clean water daily to displaced communities for nearly a month. The effort mitigated the risk of waterborne diseases and exemplified how public-private partnerships can build resilience during climate-induced disasters. Our intervention provided not only emergency relief but also reaffirmed our commitment to climate adaptation and health security in vulnerable areas.

For details, check – Social Impact 2024

https://ptcl.com.pk/uploads/Social%20Impact%20Report%202024.pdf

ConnectHear Program
Disaster Inclusion through AI-Powered Accessibility

In partnership with ConnectHear, we co-developed Pakistan's first AI-powered early warning system for the Deaf community. This groundbreaking initiative ensures that individuals with hearing impairments receive real-time emergency alerts in sign language, even in low-connectivity areas. It is a critical step toward inclusive climate resilience, addressing a major gap in disaster preparedness and accessibility for persons with disabilities.

For details, check – Social Impact 2024
https://ptcl.com.pk/uploads/Social%20Impact%20Report%202024.pdf

PAKISTAN'S FIRST AI POWERED EARLY WARNING SYSTEM FOR THE DEAF COMMUNITY

Blood Donation Drive
Fostering a Culture of Life-Saving Compassion

On World Blood Donor Day, PTCL Group organized its annual blood donation drive, with enthusiastic participation from employees nationwide. Beyond being a humanitarian gesture, the campaign reinforces our internal culture of empathy and social responsibility, encouraging collective action for public health outcomes.

For details, check – Social Impact 2024

https://ptcl.com.pk/uploads/Social%20Impact%20Report%202024.pdf

Pinktober

Breast Cancer Awareness and Employee Health Empowerment
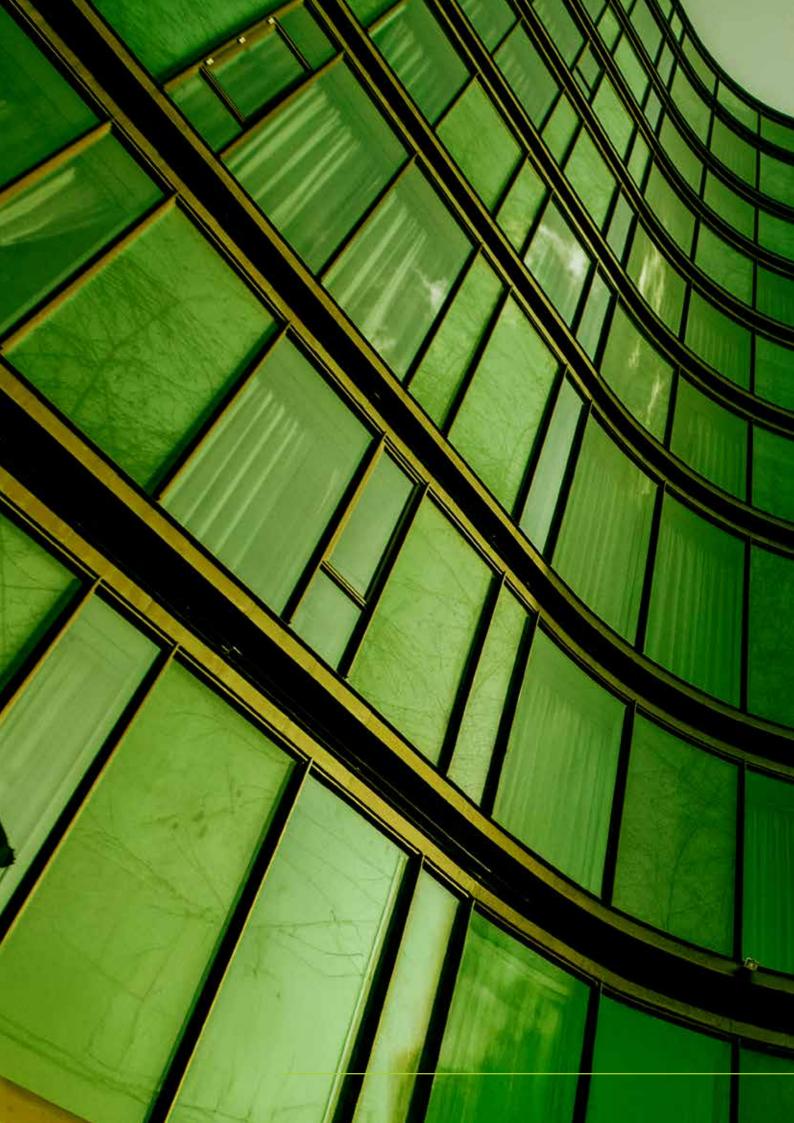
As part of Breast Cancer Awareness Month, we partnered with Pink Ribbon Pakistan and Shaukat Khanum Memorial Hospital to conduct digital awareness campaigns and in-house educational sessions for employees. The PTCL Group Tower was illuminated in pink as a symbol of solidarity. This initiative emphasized preventive health education and early detection a cornerstone of sustainable health outcomes in corporate communities.

For details, check – Social Impact 2024

https://ptcl.com.pk/uploads/Social%20Impact%20Report%202024.pdf

Initiative	Focus Area	Reach/Impact	SDG Link
Dil Se Ba-Ikhtiar	Women Empowerment	100 women trained & digitized	SDG 5, 8, 9
Water Wells – Thar	Access to Water	15,000 people	SDG 6
E-Bike Distribution	Gender Mobility	Female students at RWP University	SDG 5, 11, 13
Flood Relief Balochistan	Disaster Relief	30,000 liters/day clean water	SDG 3, 6, 13
ConnectHear AI Alerts	Inclusive Resilience	Deaf access to disaster warnings	SDG 10, 11, 13
Blood Donation Drive	Health & Solidarity	Annual employee-led initiative	SDG 3
Pinktober Campaign	Preventive Health	Awareness & early detection	SDG 3, 5

OPERATING RESPONSIBLY

ECONOMIC PERFORMANCE

Why is this topic material to PTCL Group?

Economic performance is at the core of PTCL Group's ability to create long-term value for its stakeholders, including shareholders, employees, customers, and the communities we serve. As Pakistan's leading ICT services provider, PTCL Group's financial health enables us to invest in cutting-edge technology, expand digital access, create jobs, and support national economic growth.

PTCL Group recognizes that sustainable economic performance is not only about delivering shareholder returns but also about building resilience, ensuring transparency, and aligning financial goals with broader ESG priorities.

Governance & Oversight of Economic Performance:

PTCL Group's economic performance is strategically managed by the Finance and Strategy teams under the oversight of senior leadership. These teams are responsible for developing, implementing, and monitoring the company's financial strategies.

Key governance structures include:

- **5-Year Business Plan:** Developed by the Finance and Strategy departments, this roadmap outlines PTCL Group's long-term strategic goals, financial forecasts, and investment priorities.

- **Budgeting & Resource Allocation:** Financial resources are allocated based on business priorities, strategic objectives, and evolving market conditions.

- **Business Review Meetings:** Regularly held throughout the year, these meetings assess financial performance against targets, using variance analysis and key performance indicators (KPIs) to drive accountability and informed decision-making.

Setting Measurable Financial Objectives

PTCL Group sets clear, measurable financial objectives to ensure alignment with business goals. These targets are reviewed and adjusted as part of the annual planning process, ensuring that financial performance remains responsive to market dynamics.

Key financial objectives include:

- Revenue growth
- Cost optimization
- Margin improvement
- Investment in network expansion & technology upgrades
- Long-term value creation for shareholders

Financial Resources and Investment Strategy

PTCL Group allocates financial resources strategically to support business continuity, innovation, and growth. Resource allocation is closely linked to the 5-year business plan, ensuring alignment between long-

term vision and short-term execution.
Areas prioritized for investment include:

- Network modernization and infrastructure development.
- Digital platforms and service innovation.
- Employee development and retention
- Community engagement and CSR programs.

Monitoring and Evaluation:

PTCL Group's financial performance is monitored continuously through internal reviews, performance dashboards, and formal evaluation mechanisms. Variance analysis and business reviews ensure that financial objectives are met, risks are identified early, and corrective actions are taken proactively.

Financial Data: See Annual Report

While this section outlines PTCL Group's economic performance framework, detailed financial data is published in the PTCL Group Annual Report, available on the company's website at

https://ptcl.com.pk/ This approach ensures transparency while maintaining clarity in the sustainability report.

Future Focus: Advancing ESG-Aligned Financial Reporting

Looking ahead, PTCL Group is committed to enhancing the depth and transparency of its economic reporting. Recognizing the global shift towards integrated sustainability and financial disclosures, PTCL Group has started aligning its data collection and reporting practices with the IFRS Sustainability Disclosure Standards (IFRS S1 and S2).

As part of this evolving approach, PTCL Group is working towards identifying, measuring, and reporting the financial impacts, risks, and opportunities arising from ESG factors, an area that has not yet been formally calculated or disclosed.

This forward-looking commitment underscores PTCL Group's dedication to embedding sustainability into the core of its financial strategy, ensuring long-term value creation for all stakeholders in a rapidly changing global economy.

RESPONSIBLE PROCUREMENT PRACTICES

Why is this topic material to PTCL Group?

As a large-scale organization with an extensive and complex supply chain, PTCL Group's procurement decisions have significant ripple effects, from economic impact and ethical responsibility to environmental footprint. Ensuring that procurement is carried out responsibly is critical not only for compliance and risk management, but also for meeting stakeholder expectations around transparency, local economic support, and ethical governance.

Management Approach

PTCL Group manages procurement through a formal policy framework that embeds ethical standards in supplier contracts and encourages local sourcing. Recent digital transformations including supplier onboarding, PO issuance, and sourcing have enhanced efficiency, minimized manual errors, and reduced environmental impact. These measures ensure transparency, accountability, and operational sustainability across the supply chain.

From Legacy to Leadership in Procurement

As one of the largest organizations in the country, PTCL Group recognizes the immense influence and responsibility it carries across its supply chain. With operations spanning diverse sectors and regions, our procurement system has traditionally relied on conventional methods. While these methods served their purpose in earlier phases, they often demanded significant resources and lacked the agility required for modern sustainability-driven operations.

Today, we are transitioning from these legacy approaches to a more structured, transparent, and sustainability-aligned procurement management system, one that not only meets current needs but also anticipates future expectations.

Ethical Standards Embedded in Supplier Engagement

PTCL Group ensures that ethical standards are not just a principle but a contractual obligation. All major procurement contracts include mandatory ethical procurement clauses, covering areas such as transparency, fair competition, and anti-corruption. Post-contract performance reviews evaluate compliance with these clauses, and in cases of violation, penalties and liquidated damages are enforced, reinforcing our commitment to integrity across the supply chain.

Prioritizing Local Economic Empowerment

PTCL Group maintains a strong commitment to nurturing local enterprises. 58% of our procurement spend currently supports local suppliers; a trend we aim to reinforce as our systems mature. While no rigid local sourcing targets are in place yet, preference is increasingly given to

domestic suppliers wherever feasible.

At a glance

- **Formal procurement policy in place**
- **Transitioning from conventional to structured systems**
- **58% procurement from local suppliers**
- **ISO certifications required for key vendors**
- **Penalties enforced for ethical non-compliance**

Certification & Quality Assurance

We require key vendors to hold internationally recognized certifications, such as ISO standards. These ensure that our supply chain partners meet globally accepted quality and sustainability benchmarks, contributing to overall risk mitigation and performance excellence.

Procurement Goes Digital: Smarter, Faster, Greener

At PTCL Group, we're not just modernizing processes, we're reimagining them. A series of bold digital initiatives are transforming our procurement landscape, replacing paper trails with seamless digital workflows. These enhancements are reducing paper use, boosting transparency, and empowering better decisions across the board.

SAP Ariba SLP – Digital Onboarding, Delivered

Launched in August 2024, the SAP Ariba Supplier Lifecycle & Performance (SLP) platform has replaced manual vendor onboarding with a fully digital,

paperless process. This shift improves speed, accuracy, compliance, and real-time collaboration with vendors, while eliminating physical documentation and the inefficiencies that came with it. This initiative made the onboarding process completely paper-free.

Vendor Feedback Portal – Listening Smarter

Introduced in mid-2023, our Vendor Feedback Management system gives suppliers a direct voice via a dedicated online portal. By promoting two-way communication, we're not only building stronger partnerships but also fuelling continuous improvement across our procurement ecosystem.

PO Digitalization – Efficiency in Every Order

2025 is a year where PO Process is undergoing digital transformation. PTCL Group has started issuing POs digitally through SAP and emailed directly to vendors. POs are now faster, more accurate, and more transparent, reducing errors and ensuring timely, traceable communication.

Expanding SAP Ariba Sourcing – Strategy at Scale

After successful adoption in head office, SAP Ariba is now being rolled out to Regional Procurement. This will improve efficiency, enhance transparency, and enable fully paperless onboarding across all regions.

ANTI CORRUPTION

Why is this topic material to PTCL Group?

Integrity, ethical conduct, and strong anti-corruption practices are essential for PTCL Group's long-term success and stakeholder trust. As Pakistan's leading telecom company, PTCL Group operates in a dynamic regulatory environment where transparency and accountability are critical. Anti-corruption measures protect the company from legal and reputational risks while supporting fair competition and responsible business practices. PTCL Group's commitment to ethical leadership is a cornerstone of its governance framework and sustainability strategy.

Management Approach

PTCL Group maintains a formal Anti-Corruption Policy, accessible on the PC HUB under Compliance > Ethics & Compliance. The policy reflects our zero-tolerance stance on corruption, bribery, money laundering, and unethical practices, and is regularly reviewed to remain aligned with global best practices and evolving regulatory requirements.

Reporting Channels

PTCL Group ensures that employees can report concerns confidentially and without fear of retaliation through multiple channels:

Strengthening Governance & Ethical Leadership

Updated PTCL Group Code of Conduct: Aligns with global best practices, setting clear expectations for ethical behaviour, fair competition, anti-bribery, anti-money laundering, global sanctions, export controls, and the prevention of child and forced labour.

- **Ethics & Compliance Charter:** Defines the function's mandate, roles, and responsibilities, reinforcing ethical leadership across the Group.

- **Revised Ethics & Compliance Steering Committee Charter:** Expands focus from regulatory compliance to a broader ethics and compliance governance model.

The Ethics & Compliance team, in collaboration with Procurement, is implementing Dow Jones, a due diligence tool to assess risks related to third parties, including corruption risks.

Compliance Hotline
compliance@ptclgroup.com

Meri Awaz Portal
meriawaz@ptclgroup.com

Whistleblower Hotline
wb@ptclgroup.com

Awareness, Training, and Culture

PTCL Group invests in a comprehensive Anti-Corruption Training Module and engages employees through: Digital training, compliance workshops, multi-channel engagement campaigns, and targeted awareness programs, ensuring employees understand their compliance obligations. A 'tone from the top' approach reinforces ethical behaviour through direct communication from senior leadership, including the CEO and CXOs.

Automation & Innovation in Compliance

PTCL Group is leveraging technology and data-driven solutions to strengthen its anti-corruption framework:

- **Compliance Risk Management Automation:** Implemented structured compliance matrices covering telecom and non-telecom regulations to enhance risk mitigation.

- **Conflict of Interest (COI) Disclosure Management System:** Automated to enhance transparency, efficiency, and accountability in managing COI disclosures.

Monitoring and Audit/ Maturity Assessment

PTCL Group maintains a robust monitoring and audit framework to ensure compliance with anti-corruption standards. The Internal Audit Department is responsible for investigating reported cases of suspected corruption, unethical behaviour, or regulatory breaches. Annual Compliance Maturity Assessments are conducted by e& Compliance under ISO 37301 standards to evaluate the effectiveness of compliance practices. Every three years, an external assessor is appointed to conduct an independent Compliance Program Maturity Assessment for e& OpCos, ensuring global standards are met.

PTCL Group also conducts internal compliance reviews, as part of its continuous improvement process. This multi-layered monitoring system reinforces accountability, transparency, and the continuous enhancement of PTCL Group's anti-corruption framework.

Awards & Recognitions

PTCL Group's dedication to fostering a culture of integrity, transparency, and accountability has been acknowledged through prestigious industry awards and recognitions. In 2024, PTCL Group received recognition at the e& Ethics & Compliance Ceremony, celebrating its advancements in compliance excellence, ethical leadership, and best-in-class governance practices.

These accolades reflect the collective commitment of PTCL Group's employees and leadership to "Doing the Right Thing," upholding global standards, and setting new benchmarks for responsible and ethical business conduct.

2024 Achievements

- Recognition at the e& Ethics & Compliance Ceremony.
- Updated Compliance Frameworks & Governance Structures.
- Launch of Digital Compliance Platform.
- Strengthened Conflict of Interest Framework.
- Increased Compliance Awareness through campaigns and training.
- Enhanced third-party risk management and contract clauses.

Best Team of the Year

Most Improved Compliance Program

Our Performance	2022	2023	2024
Percentage of employees that the organisation's anti-corruption policies and procedures have been communicated to	100%	100%	100%
Percentage of employees who have attested to ethics and compliance policies	N/A	N/A	95%
Number of concerns brought to the whistleblowing line	49	63	76
Number of cases investigated	22	31	42
Number of substantiated cases	10	15	24
Compliance Maturity Assessment rating (ISO 37301). (Out of 5)	3.67 (73%)	3.99 (80%)	4.38 (88%)

CYBERSECURITY

Why is this topic material to PTCL Group?

At PTCL Group, cybersecurity is not just an IT concern, it is a strategic imperative that safeguards customer trust, operational continuity, and national digital infrastructure. As Pakistan's leading telecom operator, we handle vast volumes of sensitive data and critical communication systems. Any breach in cybersecurity could lead to service disruptions, reputational damage, or regulatory consequences. Therefore, protecting our digital assets is vital to ensuring business resilience, regulatory compliance, and stakeholder confidence in an increasingly connected world.

Management Approach

PTCL Group's cybersecurity management is anchored in a formal Information Security (IS) Policy, applicable across PTCL and Ufone operations. The policy governs all forms of information, physical and digital, and applies to people, processes, and technologies managing PTCL Group data. Aligned with the Etisalat Group Cyber Security Framework (EGCSF), the policy draws upon globally recognized standards including ISO and NIST.

Our security framework is built around five foundational principles: Confidentiality, Integrity, Availability, Authenticity, and Non-repudiation. These principles are embedded into our systems, processes, and response protocols to ensure secure and trusted operations.

Cybersecurity oversight is provided by the Information Security Steering Committee (ISSC), comprising executive leadership and senior IS professionals. Operational leadership rests with the Group Vice President Cybersecurity, reporting to the Group CTO, and supported by leads for Technology Governance, Cyber Operations, Business Continuity, and Business Intelligence.

Organizational Capabilities

PTCL Group's cybersecurity function operates through four core pillars: Security Operations, Offensive Security, Security Architecture, and Managed Security Services. Together, these units ensure end-to-end protection, from threat detection and monitoring to architecture design, policy implementation, and customer-focused services. These teams enable 24/7 incident monitoring, risk identification, and advanced analytics, while also ensuring that all new technologies and projects are assessed for security compliance.

This centralized yet specialized structure ensures that cybersecurity is integrated into both corporate infrastructure and customer touchpoints, maintaining resilience against evolving threats.

Cyber Risk Identification & Management

PTCL Group follows a structured and proactive risk management approach, aligned with e& Group guidelines. Cyber risks are categorized around the core domains of confidentiality, integrity, and availability, and are tracked in an enterprise-wide risk register.

Key risk categories include unauthorized access, malware attacks, phishing and social engineering, third-party vulnerabilities, legacy systems, and data leakage. These risks are continuously assessed through regular threat monitoring, intelligence analysis, internal audits, and penetration testing.

Our risk management process prioritizes threats based on potential impact, ensures alignment with international frameworks, and feeds directly into governance discussions at the ISSC level. This integrated approach allows us to respond swiftly to emerging risks and maintain operational continuity.

Monitoring, Audits, & Compliance

To ensure regulatory compliance and continuous improvement, PTCL Group conducts annual cybersecurity audits through internal teams and qualified external entities. These include the CTDISR audit by the PTA, third-party reviews, and PCI DSS assessments. Additionally, bi-annual vulnerability assessments are conducted based on a formal calendar.

These structured evaluations reinforce our controls and ensure alignment with both national regulations and global best practices.

Employee Awareness & Culture

Strengthening cybersecurity culture is a core objective at PTCL Group. All employees undergo quarterly e-learning modules on key information security topics, complemented by ongoing advisories, security awareness campaigns, and phishing simulations. These efforts ensure that employees are equipped to recognize threats and act responsibly. We conduct Phishing Simulations to test the awareness of employees pertaining to Social Engineering / Phishing Attacks. They are routed to a video training automatically after becoming a victim.

Performance Monitoring & Metrics

While PTCL Group tracks multiple operational indicators, eight Key Risk Indicators (KRIs) are formally monitored as part of the Etisalat Group oversight model. These include metrics related to vulnerability management, system breaches, patch coverage, incident response, and legacy system use. This data informs strategy and ensures that risks are mitigated proactively.

No substantiated complaints or breaches of customer data were reported during 2023–2024. PTCL Group remains committed to upholding the highest standards of data protection across all touchpoints.

KPIs	2024
Number of Data Breaches Involving Customer Data	0
Number of attempted cyber attacks	33,243
Number of actual cyber attacks	0

DIGITAL ACCESS & INCLUSION

Why is this topic material to PTCL Group?

At PTCL Group, digital inclusion is central to our mission of empowering lives through connectivity and innovation. As Pakistan undergoes rapid digital transformation, millions remain underserved due to geographic, socio-economic, or technological barriers. PTCL Group recognizes that access to high-speed internet and financial services are fundamental enablers of development unlocking opportunities in education, employment, healthcare, and entrepreneurship.

Given our nationwide footprint, we are uniquely positioned to bridge these gaps. Through robust investments in fiber broadband infrastructure and our financial services subsidiary, U Microfinance Bank, we are advancing equitable digital and financial access for communities across Pakistan. These efforts are aligned with national development agendas and global goals such as SDG 9 (Industry, Innovation and Infrastructure) and SDG 10 (Reduced Inequalities).

Management Approach

PTCL Group adopts a multi-dimensional strategy to drive inclusive access, focusing on digital infrastructure expansion and financial empowerment in underserved regions.

Broadband Infrastructure Expansion

In 2024, PTCL Group's fixed broadband segment achieved an outstanding 20% year-over-year growth, with Flash Fiber experiencing an exceptional 104% increase. The company now serves over 650,000 Fiber-to-the-Home (FTTH) subscribers, and more than 1.5 million homes are Flash Fiber ready, reflecting our commitment to advancing Pakistan's high-speed internet infrastructure.

This continued network expansion is not only transforming the digital landscape in urban centers, but also laying the groundwork for future outreach into peri-urban and remote areas.

Financial Inclusion through U Microfinance Bank

In a country where 70% of the population remains unbanked, PTCL Group is championing financial inclusion through U Microfinance Bank (U Bank), a wholly owned subsidiary of the Group. With over 300 branches, primarily in rural regions, U Bank is actively supporting Pakistan's National Financial Inclusion Strategy, which aims to integrate 50% of the adult population into the formal banking system.

U Bank's impact is both deep and broad. Its loan portfolio has grown fivefold in five years, and it now serves over five million depositors and 400,000 loan clients. By offering microloans and essential banking services, U Bank is dismantling financial barriers and promoting economic participation among marginalized communities.

This strategic focus not only empowers individuals but contributes to national economic resilience, reinforcing PTCL Group's commitment to inclusive and sustainable development through financial innovation.

LOOKING AHEAD:
OUR JOURNEY CONTINUES

PTCL Group continues its sustainability journey, we remain committed to evolving our practices in alignment with global standards and national priorities. This report marks a significant step toward greater transparency, accountability, and long-term value creation for our stakeholders. With strong governance, measurable goals, and a growing culture of responsibility, we are confident in our ability to build a more inclusive, resilient, and sustainable future for Pakistan.

This report reflects not just where we stand today but where we're determined to go. With our sustainability foundations now firmly established, PTCL Group is moving ahead with purpose. We will keep listening, learning, and leading with integrity as we shape solutions that create shared value for our people, our planet, and our economy.

APPENDIX A
REPORT SCOPE & BOUNDARIES

Completeness and aspect boundaries	PTCL has attempted to make this report as complete as possible. This report covers major activities from the PTCL-Departments, and include activities undertaken by its branches.
Materiality	PTCL believes this report covers the most material issues to PTCL and its stakeholders. In alignment with the principles of the GRI standards, PTCL's materiality assessment consists of four steps: 1) identifying relevant topics; 2) prioritising topics according to impact on PTCL and its stakeholders; 3) validating the prioritised topics through reviews and evaluations; 4) review its materiality matrix on an annual basis.
Stakeholder inclusiveness	PTCL has identified and considered all key stakeholders and has outlined ways that the company engages with them to identify their needs and priorities.
Sustainability context	PTCL has considered regional trends in sustainability that affect its activities.
Reporting cycle	This report covers the calendar year for 2020.
Balance	This report seeks to demonstrate transparency, presenting our performance in economic, social, and environmental topics in a balanced way.
Comparability	Comparisons are made throughout the report against 2018 and 2019.
Accuracy and reliability	To the best of PTCL's ability, all the information presented in this report is accurate and represents the best data available to the company and its stakeholders.
Clarity	This report targets a wide audience with varying degrees of understanding of telecommunications and technology. Therefore, PTCL strived to ensure this report is easily understandable to all anticipated readers.
Assurance	The report has not been externally audited or assured.

GRI INDEX
2023-2024

GRI Standard (2021)	Disclosure Number	Disclosure Title	Response
GRI 101: Foundation	Does not include any disclosures		
GRI 102: General Disclosures	102-1	Organizational details a. Legal name b. Nature of ownership and legal form c. Location of headquarters d. Country of operation	 Pakistan Telecommunication Company Limited (PTCL) Public limited Islamabad Pakistan
	102-2	Entities included in the report	p. 8
	102-3	Reporting period, frequency, contact	p. 2
	102-4	Restatements of information	Not applicable (first-time report)

	102-5	External assurance	Not assured
	102-6	Activities, value chain, relationships	p. 8; p. 14
	102-7	Employees	p. 50–53
	102-9	Governance structure and composition	p. 34–39
	102-10	Nomination and selection of the highest governance body	p. 34
	102-11	Chair of the highest governance body	p. 2; p. 34
	102-12	Highest governance body role in sustainability	p. 36–37
	102-13	Delegation of responsibility	p. 14
	102-15	Conflicts of interest	p. 40
	102-16	Critical concerns communication	p. 42
	102-22	Sustainability strategy	p. 2-3

	102-26	Mechanisms for reporting concerns	p. 42
	102-27	Compliance	p. 40–43
	102-28	Memberships & initiatives	p. 14
	102-29	Approach to stakeholder engagement	p. 12
GRI 3: Material Topics	3-1	Determining material topics	p. 10–12
	3-2	List of material topics	p. 14
Economic Performance 2016			
GRI 103: Management Approach 2016	103-1	Explanation of the Material Topic and its Boundary	p. 30–33
	103-2	The Management Approach and its Components	p. 30–33
	103-3	Evaluation of the Management Approach	p. 30–33
GRI 201: Economic Performance 2016	201-1	Direct economic value generated and distributed	p. 30–33 For financial details, consult our annual report.

	201-2	Financial implications and other risks and opportunities due to climate change	p. 30–33
	201-3	Defined benefit plan obligations and other retirement plans	p. 30–33
	201-4	Financial assistance received from government	p. 30–33
Procurement Practices 2016			
GRI 103: Management Approach 2016	103-1	Explanation of the Material Topic and its Boundary	p. 44–47
	103-2	The Management Approach and its Components	p. 44–47
	103-3	Evaluation of the Management Approach	p. 44–47
GRI 204: Procurement 2016	204-1	Proportion of spending on local suppliers	p. 44–47
Anti-corruption 2016			
GRI 103: Management Approach 2016	103-1		p. 40–43

	103-2	The Management Approach and its Components	p. 40–43
	103-3	Evaluation of the Management Approach	p. 40–43
GRI 205: Anti-Corruption 2016	205-1	Operations assessed for risks related to corruption	p. 40–43
	205-2	Communication and training about anti-corruption policies and procedures	p. 40–43
	205-3	Confirmed incidents of corruption and actions taken	p. 40–43
Energy 2016			
GRI 103: Management Approach 2016	103-1	Explanation of the Material Topic and its Boundary	p. 44
	103-2	The Management Approach and its Components	p. 44
	103-3	Evaluation of the Management Approach	p. 44

GRI 302: Energy 2016	302-1	Energy consumption within the organization	p. 44
	302-4	Reduction of energy consumption	p. 44
Emissions 2016			
GRI 103: Management Approach 2016	103-1	Explanation of the Material Topic and its Boundary	p. 64
	103-2	The Management Approach and its Components	p. 64
	103-3	Evaluation of the Management Approach	p. 64
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	p. 64
	305-2	Energy indirect (Scope 2) GHG emissions	p. 64
	305-3	Other indirect (Scope 3) GHG emissions	p. 64
Waste 2020			
	103-1	Explanation of the Material Topic and its Boundary	p. 64

	103-2	The Management Approach and its Components	p. 64
	103-3	Evaluation of the Management Approach	p. 64
GRI 306: Waste 2020	306-2	Management of significant waste-related impacts	p. 64
Occupational Health & Safety 2018			
GRI 103: Management Approach 2016	103-1	Explanation of the Material Topic and its Boundary	p. 44
	103-2	The Management Approach and its Components	p. 44
	103-3	Evaluation of the Management Approach	p. 44
GRI 403: Occupational Health & Safety 2018	403-1	Occupational health and safety management system	p. 44
	403-2	Hazard identification, risk	p. 44
	403-3	Occupational health services	p. 44

	403-4	Worker participation, consultation, and communication on OHS	p. 44
	403-5	Worker training on occupational health and safety	p. 44
	403-6	Promotion of worker health	p. 44
	403-7	Prevention and mitigation of OHS impacts directly linked by business relationships	p. 44
	403-8	Workers covered by an OHS management system	p. 44
	403-9	Work-related injuries	p. 44
Training & Education 2016			
GRI 103: Management Approach 2016	103-1	Explanation of the Material Topic and its Boundary	p. 50–55
	103-2	The Management Approach and its Components	p. 50–55

	103-3	Evaluation of the Management Approach	p. 50–55
GRI 404: Training & Education 2016	404-1	Average hours of training per year per employee	p. 50–55
	404-2	Programs for upgrading employee skills and transition assistance programs	p. 50–55
	404-3	Percentage of employees receiving regular performance and career development reviews	p. 50–55
Diversity 2016			
GRI 103: Management Approach 2016	103-1	Explanation of the Material Topic and its Boundary	p. 50–53
	103-2	The Management Approach and its Components	p. 50–53

	103-3	Evaluation of the Management Approach	p. 50–53
GRI 405: Diversity 2016	405-1	Diversity of governance bodies and employees	p. 50–53
Local Communities 2016			
GRI 103: Management Approach 2016	103-1	Explanation of the Material Topic and its Boundary	p. 64
	103-2	The Management Approach and its Components	p. 64
	103-3	Evaluation of the Management Approach	p. 64
GRI 413: Local Communities 2016	413-1	Operations with local community engagement, impact assessments, and development programs	p. 64

Customer Privacy 2016			
GRI 103: Management Approach 2016	103-1	Explanation of the Material Topic and its Boundary	p. 20–23
	103-2	The Management Approach and its Components	p. 20–23
	103-3	Evaluation of the Management Approach	p. 20–23
GRI 418: Customer Privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	p. 20–23
Additional Topics Beyond GRI Standards			
Sector-specific: Telecom	-	Digital inclusion	p. 14–19
Sector-specific	-	Well-being	p. 50–55

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