dstelecom

ESG Report

people are our greatest and most important asset

2025



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ESRS-2 BP-1 BP-2

CEO message

Dear stakeholders and friends,

At dstelecom, we continue to follow a steady and determined path towards sustainability. We have been strengthening our commitment to environmental, social and governance (ESG) practices, improving our performance and expanding the positive impact of our actions.

The year 2025 was marked by significant achievements: we achieved a **silver rating** in the **EcoVadis assessment**, placing dstelecom in the **top 15 per cent of organisations with the best ESG performance**, amongst more than 150,000 companies assessed worldwide.

We improved our **GRESB** rating, were recognised as one of the best places to work by **Great Place to Work**, and strengthened our environmental efforts by **promoting activities with local communities**.

Sustainability has become even more deeply rooted in our culture: we have been certified for Work-Life Balance through a Certificate of Compliance issued by EIC (International Certification Company).

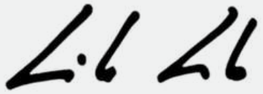
We believe that the digital motorways we build and operate play a transformative role in society. Through our multi-operator, open-access network, we promote fairer, more inclusive and more accessible connectivity, particularly in sparsely populated areas, thereby contributing to territorial cohesion and equal opportunities.

We firmly believe that innovation, sustainability and social responsibility go hand in hand in building a more resilient future. We therefore continue to align our strategies with the **Sustainable Development Goals** (SDGs), guided by our ethical and humanist values. The validation of our emissions reduction targets by the **Science Based Targets Initiative** confirms that we are on the right track to achieve carbon neutrality by 2030.

Our purpose remains unwavering: to connect people to a more innovative, inclusive and sustainable world. This mission inspires us to do more and do better – with ambition, responsibility and a sense of urgency.

With determination and confidence, we remain committed to creating lasting value for everyone who joins us on this journey.

Yours sincerely,



CEO | Ricardo Salgado

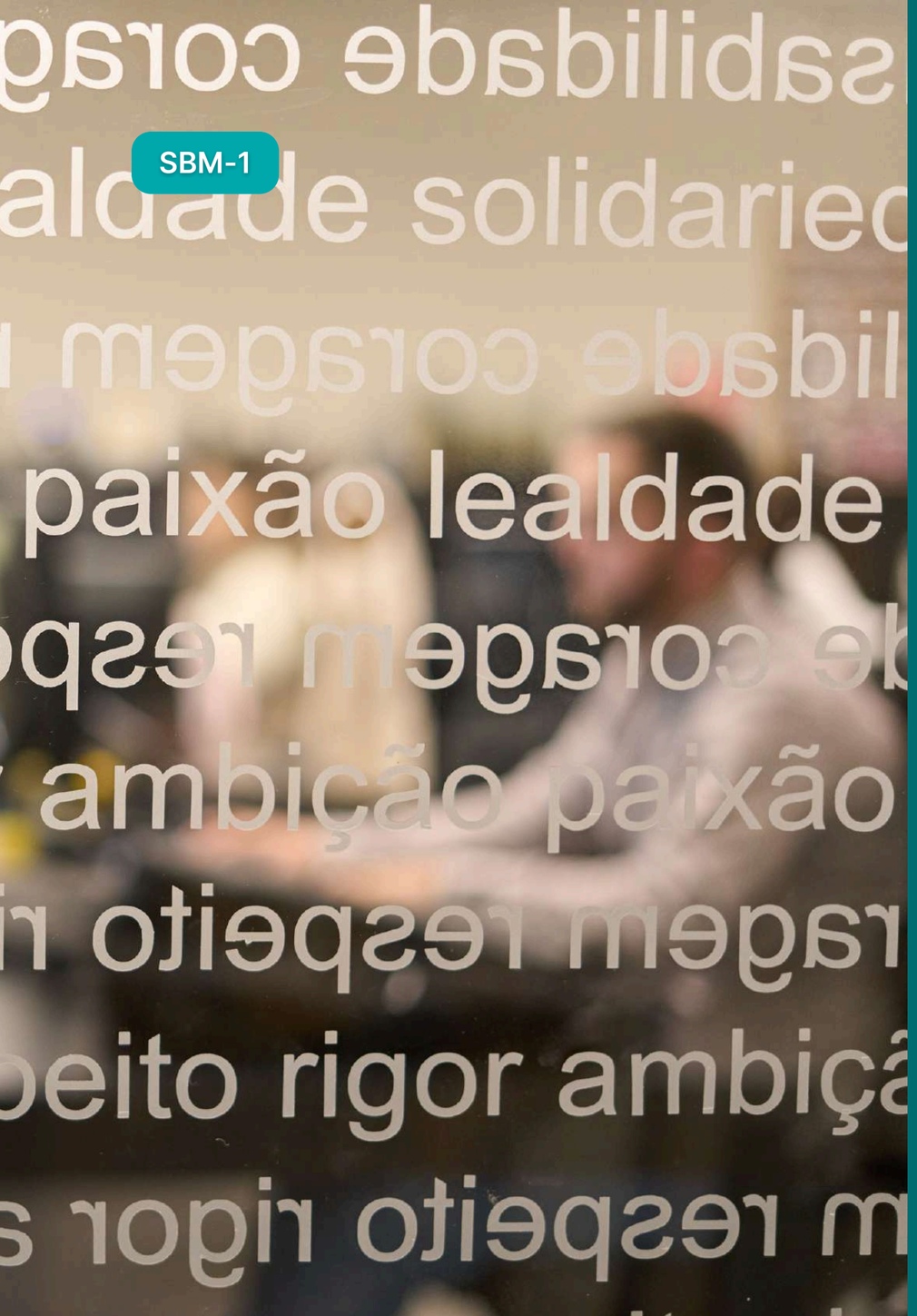
SBM-1

mission

Freeing people from geographical barriers, building a digital world.

Imagine a country where physical borders dissolve and distance is no longer an obstacle. Our mission is to connect every corner of the country, transcending all geographical barriers. We believe that communication and access to information should be free and unlimited for everyone. To this end, we are committed to building and operating an inclusive and neutral telecommunications network, accessible to all retail operators. This model offers end customers the chance to enjoy high quality telecoms services, with the freedom to choose from a wide range, at competitive prices, wherever they live or decide to live. We are dedicated to freeing people from geographical barriers, creating a digital world that brings everyone closer together and empowers them.





vision

Developing open communications networks in a sustainable way, especially in low population density areas.

We dream of a future where everyone, regardless of where they live, can enjoy the benefits of high-quality digital communications networks. With a firm focus on sustainability and inclusion, we are dedicated to building and expanding open communications networks, especially in sparsely populated regions. We believe that connectivity is a fundamental right that should be available to everyone. Our commitment is to turn this vision into reality, in a sustainable and equitable way. We want to develop open communications networks that not only connect, but also empower communities, bringing opportunities and progress to every corner of the country.

SBM-1

purpose

Improving people's quality of life, guaranteeing connectivity and therefore contributing to a better society.

Our purpose goes beyond being a simple provider of telecoms services: we want to be an agent of transformation that raises people's quality of life and strengthens society. We believe that connectivity is a key factor in human and social progress. By providing universal access to reliable, high-quality communications networks, we open doors to educational, economic and social opportunities that build a more inclusive and prosperous society. We are committed to ensuring that every person has the tools they need to reach their full potential, contributing to a better, more connected society.



SBM-1

our history

dstelecom, founded in 2008 as part of the dstgroup, initially aimed to build a fiber-optic network to connect 11 municipalities in northern Portugal. In 2010, the company won an international public tender from the Portuguese government to establish, manage, operate and maintain Next Generation Networks in 44 municipalities in the north and 35 in the Alentejo and Algarve, covering around 250,000 homes with an Open Access Fibre Optic Network.

In March 2018, Cube Infrastructure Managers became a shareholder in dstelecom, bringing not only investment capacity, but also experience and expertise in the infrastructure area.

By 2021, dstelecom's coverage had reached more than 600,000 homes in 110 municipalities. Today, after 16 years of growth and development, the company's network covers more than 900,000 homes in areas with the greatest digital deprivation, covering 149 municipalities in mainland Portugal.

From the outset, dstelecom stuck to its wholesale-only business model, avoiding competing directly with its customers. This approach has earned it the trust of operators and the respect of the market. The greatest distinction for dstelecom is the trust of the market, especially the telecoms operators in Portugal who use its network to provide their services, demonstrating the neutrality of the business model adopted.

dstelecom is committed to providing a world-class connectivity experience to the communities covered by the project, promoting the country's economic and social development and contributing significantly to the digital inclusion, competitiveness and well-being of the citizens benefiting from it.



2008

- Establishment of dstelecom as part of the dst group
- Creation of the companies Minhocom and Valicom (partnership with CIMs of Minho and Vale do Lima)

2010

- Awarding of the Next Generation Networks (RNG) to dstelecom

2011

- Innovation with Nexgen cable and OTDR with metric capillarity.

2013

- Completion of RNG construction
- 79 municipalities with fiber optic internet
- 250,000 homes covered

2014

- BLU, ONI and Vodafone are now on the dstelecom network
- Installation for the first customer on the dstelecom network
- Northern Logistics Center
- Recognition as Best Practice by the European Commission

2015

- NOS's entry into the dstelecom network
- EDP Distribuição's entry point into the dstelecom network.
- FTTH Council Europe Award

2016

- MEO's entry into the dstelecom network
- Fast Mover Award, by Exame Informática
- Start of Smart Cities services

2017

- 308,000 homes covered
- 60,000 families connected
- Minhocom + Valicom Merger
- Infrastructure development for 40 business parks
- ISO 9001:2015 Certification

2018

- 85 municipalities with fiber optic
- 318,000 homes covered
- 91,000 families connected
- ArTelecom's entry into the dstelecom network
- Cube Infrastructure Partners' entry as a shareholder.ISO 14001:2015 Certification

2019

- 96 municipalities with fiber optic
- 411,000 homes covered
- 120,000 families connected

2020

- 437,000 homes covered
- 151,000 families connected
- Entrada da NOWO na rede dstelecom
- AEROS (innovation)
- K2D (innovation)
- Netedge (innovation)
- Awarded the 2019 "Biggest in Portugal Technological Development" prize by Exame magazine

2021

- 110 municipalities with fiber optic
- 581,000 homes covered
- 194,000 families connected
- SmartGlow (innovation)
- Award for "The Biggest in Portugal Technological Development 2020," by Exame magazine
- ISO 45001:2015 Certification

2022

- 689,000 homes covered
- 237,000 families connected
- GetOn Launch
- Creation of the Higher Technical Course in Telecommunications
- Award for "The Biggest in Portugal Technological Development 2021," by Exame
- Healthy Workplaces Award

2023

- 145 municipalities with fiber optic
- 813,000 homes covered
- 286,000 families connected
- Southern Logistics Center
- New Space Portugal
- Award for "The Biggest in Portugal Technological Development 2022," by Exame magazine
- Great Place to Work Award
- Wellbeing distinction, by GPTW
- Top 5 GRESB
- BCSD Charter of Principles
- Science Based Target Iniciative

2024

- 910,000 homes covered
- 327,000 families connected
- Launch of the AEROS satellite
- 5G Rural (innovation)
- Award for "The Biggest in Portugal Technological Development 2023," by Exame magazine
- Great Place to Work Award
- Wellbeing distinction, by GPTW
- Healthy Workplaces Award
- Top 5 GRESB
- Implementation 4457:2021
- ISO 20400:2017 Certification

2025

- 151 municipalities with fiber optic internet.
- 963,000 homes covered
- 347,000 families connected
- Great Place to Work Award
- Wellbeing distinction, by GPTW
- Top 2 GRESB
- ISO 56001
- NP4552

SBM-2

stakeholders

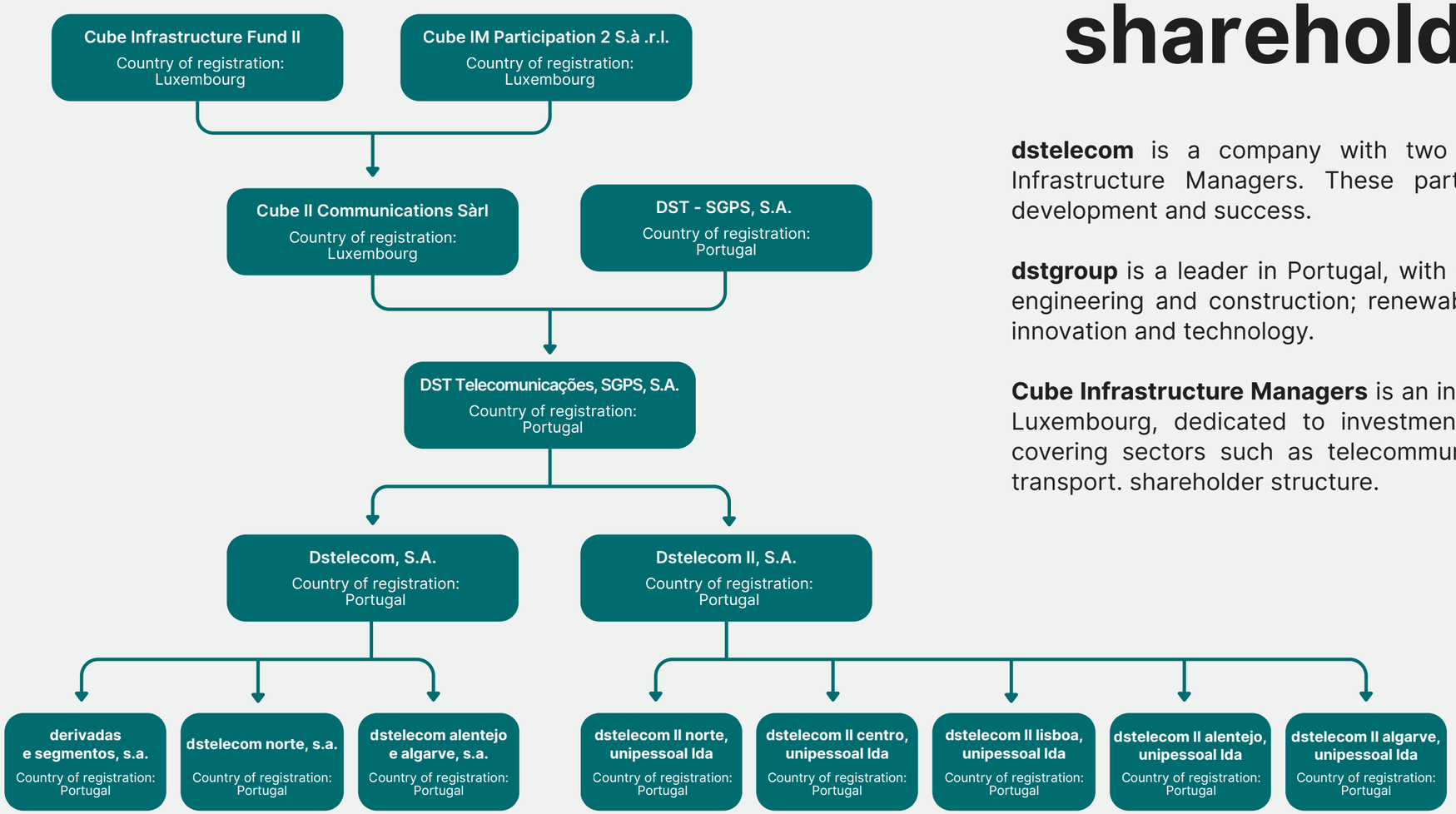
The ultimate purpose of an organisation is to generate value for its stakeholders.

Careful management of relations with all stakeholders is essential to guarantee the sustainability and resilience of our company. By creating shared value and responding effectively to social, economic and environmental expectations, we contribute to a positive legacy that will last for generations to come.



BP-1 BP-2 SBM-1

shareholder structure



dstelecom is a company with two main shareholders: dstgroup and Cube Infrastructure Managers. These partners play key roles in the company's development and success.

dstgroup is a leader in Portugal, with vast experience in various areas, including engineering and construction; renewable energies; the environment; real estate; innovation and technology.

Cube Infrastructure Managers is an independent management company based in Luxembourg, dedicated to investments in the European infrastructure sector, covering sectors such as telecommunications, energy, smart cities and public transport. shareholder structure.

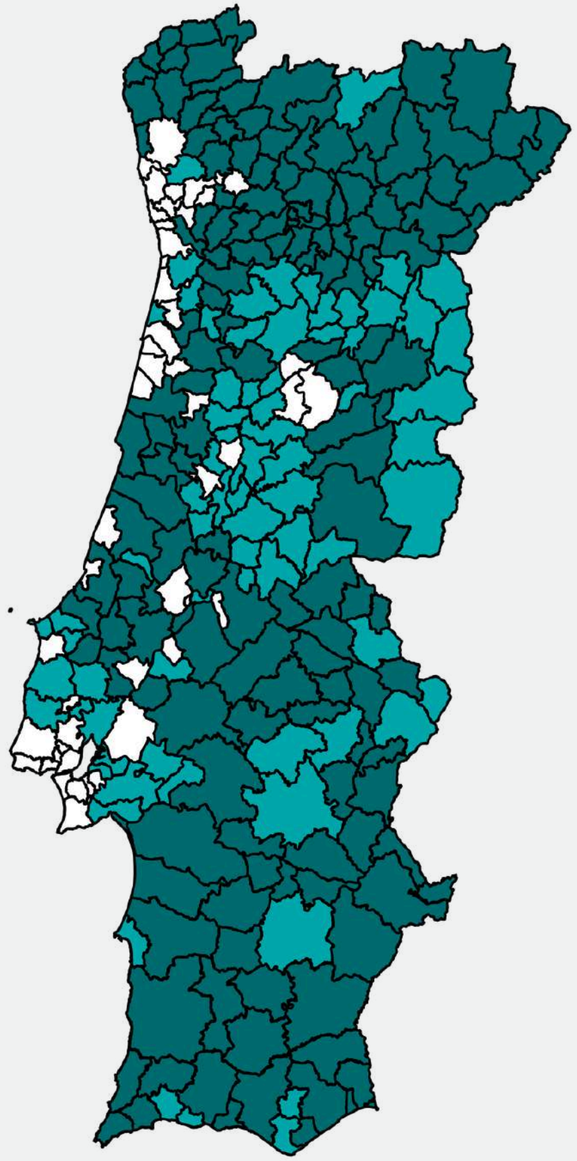
SBM-1

2025 in numbers



network coverage - 2025

- **2025** 1,000,000 connected houses > 153 municipalities
- **2024** 900,000 connected houses > 149 municipalities
- **2022** 668,000 connected houses > 121 municipalities
- **2020** 500,000 connected houses > 100 municipalities
- **2017** 350,000 connected houses > 82 municipalities
- **2013** 250,000 connected houses > 78 municipalities



municipalities in which we operate

Forecast of new municipalities to be covered under the ‘White Zones’ Project

GOV-1 GOV-2

sustainability governance

Executive Committee







At dstelecom, sustainability is a strategic pillar, reflected in our robust and multidisciplinary governance structure.
In addition to the Executive Committee, we have three specialised committees dedicated to critical issues.

- **Sustainability Committee:** has the mission of consolidating an internal culture of efficiency in the use of resources, promoting synergies between departments, fostering sustainable behaviour and strengthening economic and social cohesion in the communities where we operate.
- **Diversity, Equity and Inclusion Committee (DEI)**: works to create an inclusive environment, valuing diversity as a driver of innovation and equity.
- **Energy Management Committee**: focuses on optimising energy consumption, promoting practices that reduce environmental impact and ensuring
- operational efficiency.

GOV-1 GOV-2

sustainability committee

The Sustainability Committee plays a key role in integrating ESG practices into all areas of dstelecom.

This strategic body ensures that these practices are transversal to operations, promoting a balance between economic growth, environmental responsibility and positive social impact.



Main objectives:

- Implement an organisational culture focused on the efficient use of resources and reducing environmental impact;
- Develop and monitor strategies that align business objectives with global sustainability goals;
- Foster partnerships and initiatives that contribute to the sustainable development of the communities where dstelecom operates;
- Ensure transparency and effective communication of sustainability performance.



GOV-1 GOV-2

energy management committee

Specialising in energy efficiency and the transition to renewable sources, this committee's mission is to reduce the environmental footprint of operations while optimising energy costs.

Its work is essential to comply with the organisation's environmental and regulatory commitments.

Main objectives:

- Identify and implement solutions to reduce energy consumption;
- Promote the adoption of clean technologies and renewable energies;
- Develop monitoring systems to assess energy performance;
- Ensure compliance with applicable environmental standards and regulations.













GOV-1 GOV-2

DEI committee

This committee is dedicated to creating an equitable and inclusive working environment, recognising diversity as a driver of innovation and competitive advantage.

Its action is essential to building an organisational culture that values differences and promotes equal opportunities.

Main objectives:

- Develop policies and practices that guarantee fairness at all hierarchical levels;
- Promote awareness-raising and ongoing training on diversity and inclusion issues;
- Create mechanisms that ensure representativeness and respect for all dimensions of diversity;
- Establish metrics to monitor the progress and impact of DEI initiatives.















SBM-2 IRO-1

sustainability strategy

Materiality is a standard for the inclusion of information to be disclosed by companies to their stakeholders. It is an exercise in transparency in which we try to convey which sustainability topics are important to our stakeholders. Materiality will significantly influence and impact an organisation's assessments, decisions and actions in order to meet the expectations of all stakeholders.

With the adoption of the **Corporate Sustainability Reporting Directive**, companies that fulfil the non-financial reporting requirements in 2025 will also have to report on their dual materiality.

For dual materiality, we analyse sustainability topics financially and their potential for business growth or decline.



SBM-2 IRO-1

materiality definition process



List of subjects

Through benchmarking and other sources, we carried out an exhaustive survey of topics related to sustainability.



Prioritisation of topics by stakeholders

We listen to stakeholders through surveys to define the relative importance they attach to each topic.



Prioritisation of issues by the business

We assess the financial materiality of each issue internally through top management and department directors.



Materiality matrix

Using the results of points 2. and 3. we constructed the materiality matrix.



Sustainability strategy

We analysed the materiality matrix to determine the most important issues and prioritised the most important ones.

SBM-2 IRO-1

materiality



Caption	Environment
1	Climate change (E1)
2	Energy
3	Waste and the circular economy (E5)
4	Biodiversity (E4)
5	Water (E4)
6	Pollution (E2)
	Social
7	Health, safety and well-being
8	DEI
9	Retaining talent (S1)
10	Salaries and working conditions
11	Protection and customer service (S4)
12	Impact on communities (S3)
13	Human Rights (S2)
	Governance
14	Ethics and business conduct (G1)
15	Accessibility and quality of services
16	Governance and corporate culture
17	Sustainable supply and innovation
18	Reliability of the value chain (S2)
19	Security and privacy

sustainability structures, compliance and risk management

GOV-3

Incentives related to sustainability

dstelecom is in the process of gradually integrating ESG criteria into the incentive schemes applicable to management and directors. Currently, all decisions regarding new investments already incorporate the assessment of sustainability criteria, reflecting dstelecom's commitment to responsible practices in line with the best market trends.

Although there is not yet a fixed percentage of variable remuneration directly linked to sustainability objectives, some indicators linked to ESG targets have been created. These indicators are adjusted according to the strategic relevance of each topic for dstelecom.

GOV-4

Due diligence on sustainability information

We prepare financial, operational and sustainability reports, promoting the involvement of different stakeholders through open dialogues about our business and practices.

The information disclosed in sustainability reports is the result of a structured due diligence process, which includes identifying, assessing and managing ESG risks and impacts throughout dstelecom's operations and value chain.

This process is based on internal policies, such as the Responsible Purchasing Policy (ISO 20400), the supplier sustainability manual and codes of conduct, and on stakeholder communication channels, ensuring transparency, reliability and compliance with legal and regulatory obligations.

GOV-5

Risk management and internal controls

dstelecom has a risk management and internal control system geared towards sustainability, which identifies, assesses and monitors transition, reputational, market and technological risks.

This system is supported by an internal SWOT analysis, carried out regularly, to identify strengths, weaknesses, opportunities and threats, framing the management of risks and opportunities strategically.

The SWOT analysis is reviewed annually or whenever justified, ensuring that the organisation's risk profile is continually updated. The risks and opportunities identified are integrated into internal processes and sustainability reporting and are analysed. The results of these analyses are periodically communicated to management bodies, promoting transparency and informing strategic decision-making.

ESG & ODS

environment

environmental management

- Our environmental management system is certified to ISO 14001 and ISO 20400;
- We have equipped the plumbing system with taps with sensory activation and flow reducers, reducing, for example, the flushing capacity in our toilets by 50%;
- We have created a refurbishing process to reuse the materials we replace in the network;
- We work with our suppliers to find and develop more environmentally friendly solutions, both in products and packaging;
- We use existing infrastructures whenever possible;
- Development of 5G Neutral Host (multi-operator) infrastructure with a smaller footprint, less consumption of raw materials and reduced energy consumption;
- We have adopted hybrid working models, reducing the need to travel and helping to reduce the carbon footprint associated with labour mobility;
- We have incorporated sustainability criteria into the purchasing / supplier assessment process;
- We have increased the number of photovoltaic energy production plants;
- We have IoT networks, developed and supported by dstelecom's infrastructure, which allow us to monitor water quality.



ESG & ODS

environment

climate change

- Procurement of electric vehicles for use by staff on the campus where we are based, as well as car parks equipped with charging points;
- Use of LED lighting fitted with motion sensors in all office premises;
- A car-sharing platform, encouraging car-sharing for journeys;
- Regular review of network equipment configurations to adopt energy-saving practices;
- Replacement of active equipment on the dstelecom network with more energy-efficient alternatives;
- Replacement of air conditioning units at POPs with more efficient models;
- 100 per cent of the grid energy consumed at POPs is renewable, resulting in zero CO_2 emissions from the power supply to POPs;
- We have implemented a process to monitor and optimise the routes taken by technical teams with the aim of reducing travel distances;
- dstelecom’s rural networks ensure connectivity and the management of solar and wind farms located in remote areas;
- Clearing of invasive species in collaboration with local communities;
- Encouraging the avoidance of plastic and the use of reusable items, through the distribution of mugs and glass bottles to each employee.



ESG & ODS

environment

value chain

- We have implemented a responsible purchasing strategy;
- We have created a risk level matrix by purchasing category and geography;
- We prioritise the reuse of materials and equipment;
- We demand our quality standards from our suppliers and subcontractors;
- We include ESG criteria in our contracts;
- We are constantly looking for new waste recovery measures;
- We have started to calculate the life cycle of our products and services.



ESG & ODS

social

people management

- Growth in the representation of women in our workforce;
- We have maintained our recognition by GPTW Portugal;
- Regular performance appraisals;
- Creation of the Diversity, Equity and Inclusion Committee (DEI);
- We have an internal mobility programme to enhance the value of our employees;
- We have a mentoring programme that speeds up and facilitates the integration of new employees;
- We maintain a firm commitment to our human capital as our main asset;
- Provision of training rooms for people with disabilities (and internship opportunities) "PROJECT SEARCH";
- Provision of maternity kits for employees.



ESG & ODS

social

social contract
with the employees

- Establishment of the dstelecom Academy;
- Promotion of corporate skills development, with over 40 hours of training per employee;
- NP4552 certification – Work-Life Balance;
- Organisation of outdoor classes during lunch breaks;
- We maintain a firm commitment to our human capital as our main asset;
- We offer a range of benefits that promote employees' health and wellbeing: a health centre, hairdresser, nail salon, sports centre, communal laundry, arts and culture facilities, libraries and a nightclub;
- We provide internal communication channels for all employees (intranet, newsletter, news, ocionegócio);
- We offer the option of staggered working hours and a hybrid working model.



ESG & ODS

social

social contract with the polis

- Agreements with training bodies, namely the dstelecom Chair programme with the University of Minho and the course designed with IPCA;
- Viva Learning available as a learning content platform for employees;
- The expansion of broadband networks in rural areas favours the settlement of the population and companies in the interior, reinforcing social cohesion and reducing regional disparities between the coast and the interior of the country;
- dstelecom maintains a permanent dialogue with local authorities to identify specific situations with a lack of coverage, which has led to the extension of our network in order to facilitate access to distance learning and teleworking;
- In addition, it helps industrial and agricultural companies to settle by facilitating access to connectivity and sensor services for agricultural land. social contract with polis



ESG & ODS

governance

business continuity

- We defined a responsible purchasing strategy;
- We created a contingency plan for business continuity (BCP);
- We increased the resilience of our network (batteries, GG);
- We created a passive network resilience report;
- We carried out external due diligence on suppliers;
- We held a biannual management meeting to share information and align objectives;
- We carried out and published a sustainability report. business continuity

ESG & ODS

governance

innovation

- We build and operate in areas of greatest digital deprivation, eliminating geographical barriers and promoting territorial cohesion through access to innovative, state-of-the-art services;
- We have an innovation box open to all our employees' ideas;
- We have an innovation department entirely dedicated to investigating new trends and ideas to be implemented within our scope of activity;
- Project K2D: sensorized submarine cable;
- Geothermal POP: use of the earth's temperature to cool our POPs;
- Project AEROS: launch of a satellite, in partnership with various institutions;
- Project 5G.RURAL: development of a scalable neutral host infrastructure, designed to integrate all the essential elements for creating smart communities, standing out for its artistic component and its ability to adapt harmoniously to the landscapes of the regions where it will be implemented.



ESG & ODS

governance

ethics

- We have a Code of Conduct for employees and suppliers;
- We have a Plan for the Prevention of Corruption and Related Offenses;
- We have a whistleblowing channel that is public and open to the outside world;
- We have carried out questionnaires and audits of suppliers to ensure ethical practices and responsible conduct;
- We have a cybersecurity policy and we guarantee continuous improvement in this area, in order to transmit confidence to our entire network ethics.

ESG & ODS

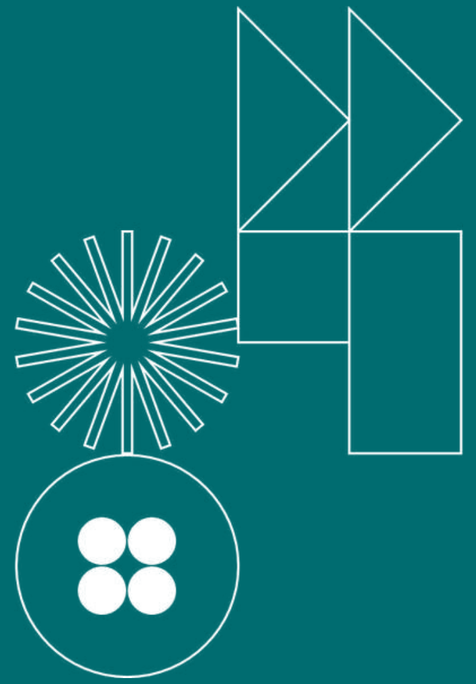
governance

public relations

- We carry out satisfaction surveys with our customers and suppliers;
- We were elected Great Place to Work in 2023, 2024, 2025 and we remain focused on maintaining this achievement;
- We received the Healthy Workplaces Award in 2023 and 2024;
- We report our ESG data annually to GRESB;
- We are recognized by our customers as a neutral telecommunications operator;
- We share both our network growth work and end-user testimonials through the media and digital channels (social networks).

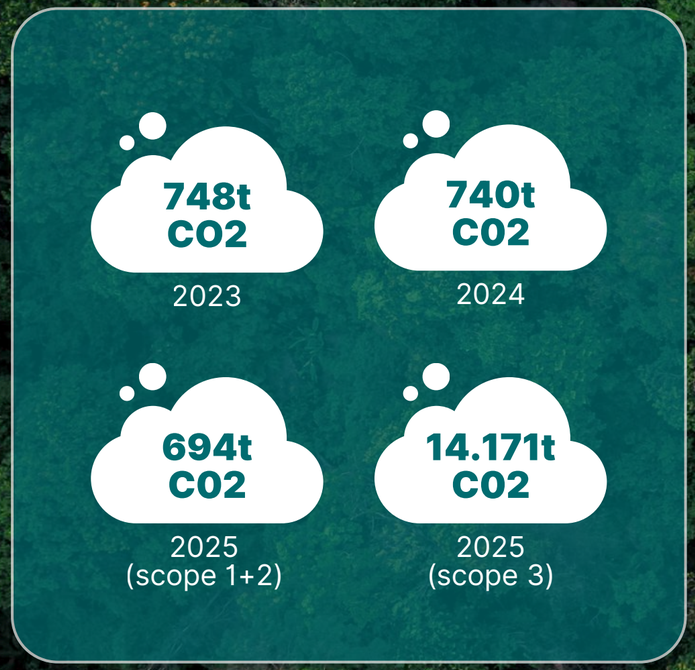


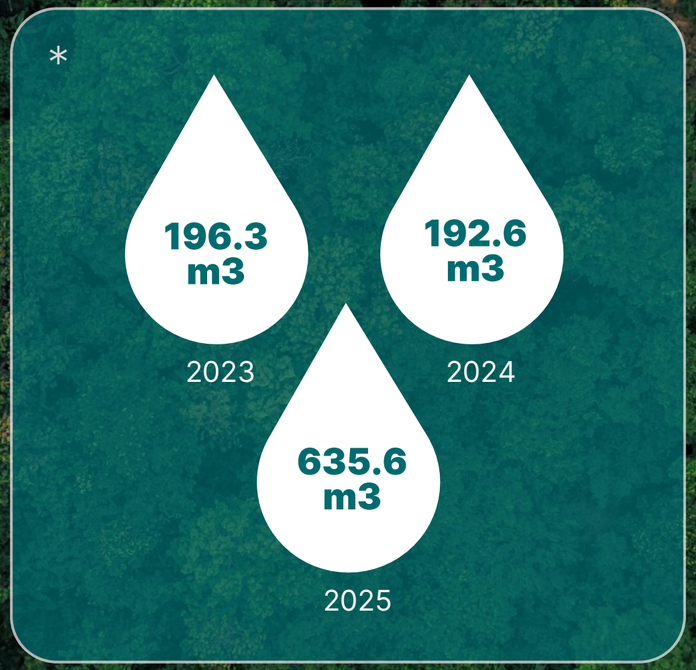
environment.



commitment to the planet

environmental performance







*Calculations based on estimates of consumption in dstelecom's own buildings, together with average consumption per dstgroup employee.

**Exceptional increase in waste production due to network expansion during 2024.

ESRS E4

environmental management

ESRS 2 IRO-1

Topic
Biodiversity

Materiality

●○○

Reduced

Ambition

- Development of a Biodiversity policy in line with IUCN principles.

Risks

- Loss of licences to operate/work stoppages;
- Increased operating costs: fines, customer disputes;
- Noise and visual pollution;
- GHG emissions (during construction).

ESRS E4

environmental management

E4-1 E4-2 E4-3 E4-4

At dstelecom, we prioritise environmental responsibility. We continually look for ways to minimise the environmental impact of our activity and study solutions in line with the circular economy and sustainability.

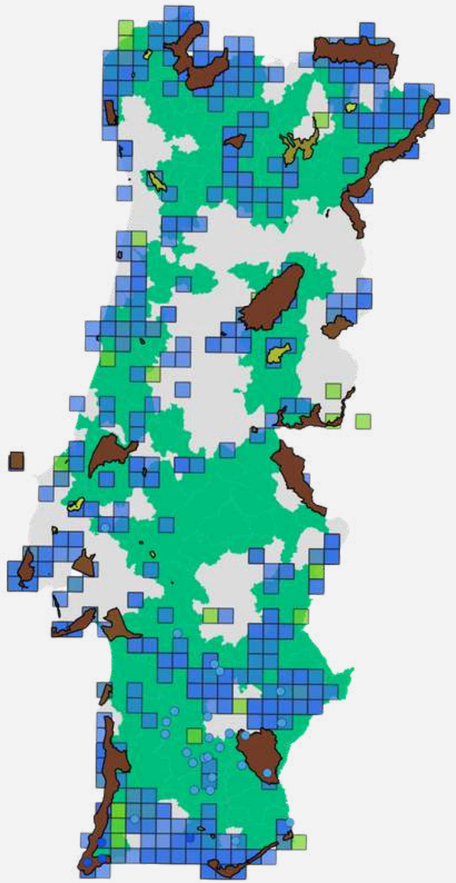
From reducing the consumption of raw materials, resources and energy, to valorising the waste from our operations, we are increasingly investing in clean energy production in order to be less dependent on fossil fuels. Through responsible construction and network management practices, we are committed to minimising our impact on local ecosystems and contributing to environmental sustainability.

Although our actions often go unnoticed, we believe that every little effort counts towards a greener and healthier future, and we are dedicated to playing our part in this journey. These actions make up, at their core, a concerted plan to protect our greatest legacy.



ESRS E4-5

environmental protection areas and dstelecom's areas of activity



Protected areas in Portugal
- National Park
- Nature Reserve
- Protected Landscape
- Natural Monument
- Regional Natural Park
- Local Nature Reserve
- Local Protected Landscape
- Regional Protected Landscape
- Private Protected Area

IUCN Redlist Fauna
- Triops baeticus (in danger)
- Triops vicentinus (in danger)

IUCN Redlist Flora
- Critically Endangered
- In Danger
- Insufficient Information
- Almost Threatened
- Vulnerable

Municipalities covered by dstelecom

Hectares of ground covered by dstelecom:
47793 ha

Percentage of the country covered by dstelecom:
53,59%

Protected areas covered by dstelecom:
35

Municipalities with endangered flora species:
149

Number of endangered flora species:
106

Number of critically endangered flora species:
49

Number of endangered fauna species:
2

Number of critically endangered fauna species:
0

E4-6

Recognising that all business activities have an impact on biodiversity, we maintain a constant concern for environmental protection and are always ready to act where necessary. This attitude reflects dstelecom's commitment to sustainable practices and the preservation of flora and fauna in the regions where we operate.

ESRS E4

environmental management tools

Recognising early on the importance of adopting a proactive role in protecting the environment, in 2018 we began implementing an **Environmental Management System** (EMS).

Over the years, this system has expanded and consolidated, implementing various measures to improve our environmental performance. We are pleased to highlight dstelecom's environmental and quality achievements in this sustainability report.
We are proud to say that we are ISO 14001 certified, which emphasises our commitment to operational excellence and environmental responsibility.

We remain focused on continuing our efforts towards sustainability, seeking innovations that benefit not only our company, but also the planet we all share. We thank all our stakeholders for their continued support in this journey towards a more sustainable future. environmental management tools



ISO 14001 certification demonstrates our commitment to responsible environmental management. We are committed to minimizing our impact on the environment by adopting sustainable practices in our production processes and daily operations. This achievement reflects our commitment to promoting environmental conservation and corporate responsibility.

Aware of global climate change, dstelecom is committed to minimizing the environmental impact of its business.

We recognize that our business activities affect society and the environment around us.

We aim to create a lasting future and ensure a positive impact for a more sustainable and prosperous world.



Our donkey called Hortelã.

ESRS E5

value chain

ESRS 2 IRO-1

Topic
Waste and the circular economy

Materiality
●●○
Moderate

Risks

- Increased operating costs due to material price rises and delays due to stock-outs;
- Reputational damage due to inefficient use of resources;
- Failure to meet commitments to clients;
- Increased costs due to fines related to waste treatment.

Ambition

- Development of a Circularity policy based on three principles: extensive analysis of the value chain, greater pressure for recycling and reuse and research into the Cradle to Cradle approach;
- Adoption of ESG criteria in the selection of suppliers;
- Development of a tool to manage plastic waste in a closed loop;
- Reinforcement of awareness campaigns to reduce printing and promote the use of recycled paper;
- Raising workers' awareness of the benefits of extending the life of everyday objects or second-hand markets;
- Introduction of mechanisms to review prices in contracts.

E5-1 E5-2

Sustainable supply chain management at dstelecom

At dstelecom, we recognise that the scarcity of resources and environmental pressures require an urgent transformation in business models. That's why we integrate circularity principles throughout our value chain, from supplier selection to materials and waste management.

Prioritization of recycled/reclaimed materials

- We require suppliers to demonstrate how they incorporate recycled or renewable materials into their products, reducing the extraction of virgin resources.
- Design for longevity and recyclability: we favour modular products that are easy to repair and have a high potential for reuse or recycling at the end of their useful life.
- Reverse logistics system: we implement mechanisms for recovering obsolete equipment, guaranteeing its proper dismantling or reintegration into new production cycles.

Fighting Resource Scarcity

- Efficiency in the use of raw materials: we work with suppliers who adopt optimized production processes, minimizing waste (e.g. reduction of packaging, reuse of by-products).
- Diversification of sustainable sources: we look for alternatives to critical materials or those with a high environmental impact, promoting substitution with renewable or abundant options.
- Partnerships for circular innovation: we collaborate with universities and research centers in the development of new materials and technologies that reduce dependence on non-renewable resources.

Certification and governance

As an ISO 20400-certified organisation, we formalise these commitments through:

- ESG contract clauses: mandatory criteria for suppliers on topics such as circular economy and resource management.
- Ongoing monitoring: periodic audits to check compliance with circularity principles.
- Supplier training: programmes to train partners in adopting circular practices.





E5-3

dstelecom has defined a set of strategic objectives that promote the efficient use of resources and the transition to a circular economy, integrating these principles throughout its value chain. These objectives include encouraging an increase in circular design, through the development, acquisition and implementation of products and services designed to minimise environmental impact throughout their life cycle.

Whenever feasible and available on the market, dstelecom favours the selection of products that are recyclable, biodegradable, composed of circular materials and energy efficient, as well as those with a reduced carbon footprint. Waste management is treated as a priority and practices are adopted to minimise the use of primary raw materials.

E5-6

dstelecom calculates the cost of life of the core products used in its network. This quantitative and qualitative analysis makes it possible to identify, for example, the financial impacts of possible increases in the cost of raw materials, and to identify the potential financial effects of material risks and opportunities associated with the use of resources and circularity.

ESRS E3

water

In our campus

E3-1 E3-2 E3-3 E3-5

In our complex, our water management strategy is based on the principle of reducing consumption wherever possible. On this basis, we have replaced more than 90% of the taps in our facilities with more efficient ones, thanks to flow reducers and sensory activation. We have also reduced the capacity of the flushing toilets by 50%. With the support of our innovation point company, we have developed an intelligent system that only allows our grounds to be watered when strictly necessary, which has also led to a considerable reduction in water consumption.

In addition, permanent monitoring of our supply networks allows us to detect any signs of leakage as quickly as possible.

And because employees' proactivity and personal awareness are crucial, we have promoted several internal awareness campaigns on the importance of responsible water consumption management.

We have not yet assessed the potential financial effects of the risks and opportunities related to water and marine resources.

ESRS 2 IRO-1

Topic
Water

Materiality
●○○
Reduced

Ambition

Developing a water management policy that addresses the following points:

- Reducing consumption;
- Increasing the use of rainwater where possible;
- Increasing the reuse and recycling of water;
- Developing an internal water price;
- Monitoring indicators of the intensity of water consumption on site.

Risks

- Interruption/stoppage of work due to water shortages;
- Reputational damage due to inefficient use of water;
- Increase in operating costs due to rising water prices.

ESRS E1

GHG emissions/climate change

ESRS 2 IRO-1

Topic
GHG emissions

Materiality
●●○
Moderate

Topic
Energy efficiency

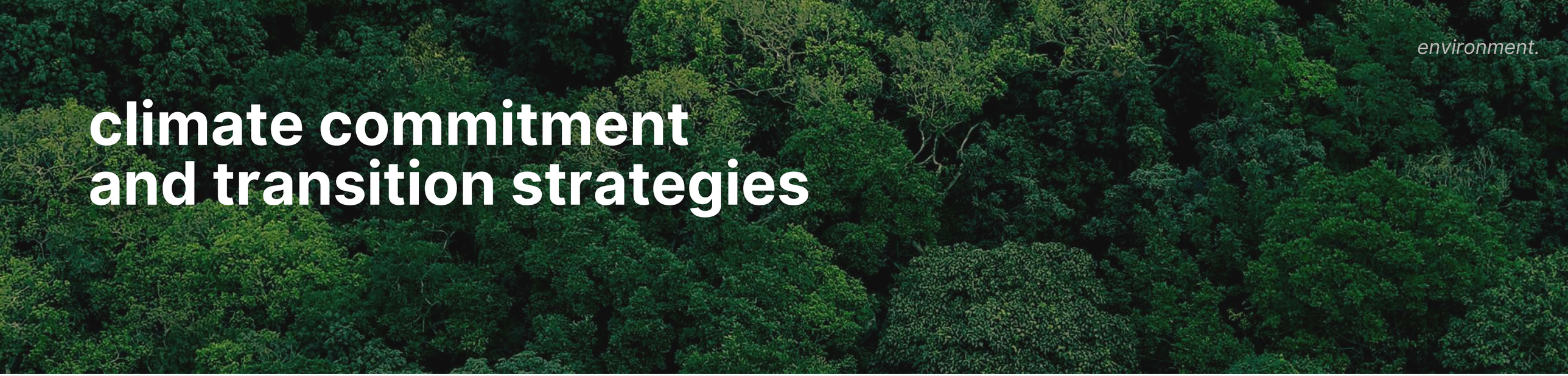
Materiality
●●○
Moderate

Ambition

- Development of a decarbonisation strategy and an internal carbon price;
- Energy self-sufficiency in our POPs;
- Development of internal office energy efficiency training;
- Increase in the number of electric vehicle charging stations on our campus;
- Study of climate-related risks in the project area;
- Use of waterproof/watertight materials that are resistant to high temperatures.

Risks

- Reduction in projects won due to failure to reduce GHG emissions in line with EU objectives (European Climate Law);
- Interruption of work due to damage to facilities and projects due to environmental disasters;
- Decrease in productivity due to extreme weather conditions;
- Increase in insurance costs, licences related to greenhouse gas emissions.



climate commitment and transition strategies

E1-1 E1-2

dstelecom, part of the dstgroup, shares and monitors the group's strategic actions in favour of energy sustainability. Since 2008, dstgroup has been at the forefront by participating and investing in the Alto Minho Wind Farm, at the time the largest in Europe.

Following this vision, dstelecom has been implementing aligned measures, such as the installation of photovoltaic panels to generate energy at its facilities and in its POPs; the purchase of 100% green energy; and the supervision and monitoring of the Energy Committee.

At the same time, innovative solutions have been adopted, such as applications that optimise the use of the car fleet, reducing kilometres travelled, and more efficient lighting and HVAC systems, helping to reduce the carbon footprint.

E1-3 E1-4

At dstelecom, we realise the urgency of combating climate change and have therefore been implementing proactive energy transition measures, even before they become regulatory requirements. Among these initiatives, we highlight efforts to reduce dependence on energy from non-renewable sources.

This year, we disclosed our scope 1 and 2 carbon emissions for the first time. We also disclosed our scope 3 carbon footprint for the year 2023 (due to delays in calculating it). Based on these results, we intend to develop an improvement plan with realistic targets and initiatives, ensuring consistent progress in line with our climate commitments.

We also recognise our role as agents of change and inspiration in the sector. We therefore share relevant information with our employees, customers and other stakeholders, raising awareness and promoting a collective commitment to sustainability.

production of clean energy

In 2025, dstelecom operated 55 installed photovoltaic plants, spread across 49 municipalities, amounting to a total installed capacity of 311.74 kW. These solutions are found in around 32% of the points of interest (POPs) with recorded consumption, highlighting the incorporation of renewable energy into the network's operations.

In that same year, solar production reached 241,700 kWh, while total consumption by POPs amounted to 4,127,436 kWh, which is roughly 5.9% of the grid's annual energy consumption.

By adhering to the previously utilized calculation methodology, this installed capacity signifies an estimated decrease of around 242 tons of CO_2 annually, which is comparable to the CO_2 absorption of approximately 1,575 trees.

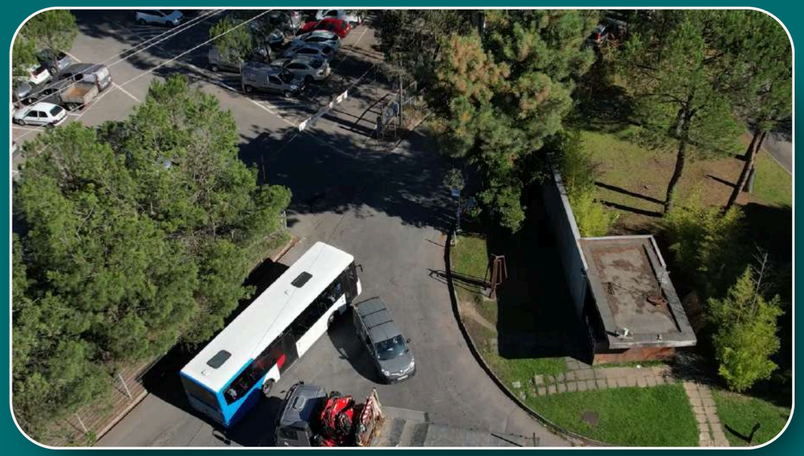




Carsharing

We've been using the dst CarSharing platform since 2017, an idea that emerged from a fruitful debate in our Innovation Box. Developed by innovationpoint, the group's R&D company, CarSharing dst consists of an application that allows employees to share professional or personal journeys.

The spirit of CarSharing dst proposes a paradigm shift: instead of ‘workers with a car’, vehicles are now at the service of workers.



Public transport route

In partnership with TUB (Transportes Urbanos de Braga), we have promoted and designed a bus route dedicated to meeting the needs of the people who work in our company, as well as in the dstgroup complex.

This route makes it easier for our employees, visitors and customers to access convenient and efficient public transport directly to our facilities. This initiative reflects our commitment to improving mobility and accessibility, ensuring that everyone can reach our complex easily and sustainably.

charter of principles

Signatories to the BCSD Charter of Principles Business Council for Sustainable Development Portugal

In 2023, dstelecom reinforced its commitment to sustainability by becoming a member of BCSD Portugal (Business Council for Sustainable Development) and subscribing to this organization's Charter of Principles. This document represents a milestone in the adoption of good business management practices, in line with the highest international standards.

This initiative aims to serve as a voluntary guide for companies of all sectors and sizes, promoting the adoption of sustainable management practices that go beyond mere legal compliance.Signatories to the BCSD Portugal Charter of Principles Business Council for Sustainable Development

The Charter is structured around **six fundamental pillars**:

- Legal Compliance & Ethical Conduct
- Human Rights
- Labor Rights
- Prevention, Health and Safety
- Environment
- Sustainable Management

These principles encourage companies to adopt internationally recognized standards, ensuring that their operations contribute to a fairer, more inclusive and environmentally responsible economy.
A Commitment that Inspires Action

By signing up to this Charter, dstelecom publicly commits to integrating sustainability into all its strategic decisions, reinforcing its mission to be an ethical, transparent and future-oriented company.

Find out more:
Members of BCSD Portugal
Charter of Principles BCSD Portugal

environmental performance indicators

In 2025, dstelecom maintained its commitment to energy sustainability, with renewable energy accounting for around 99.91 per cent of total energy consumption. Imported/purchased renewable electricity totalled 3,960.97 MWh, reflecting the company's continued commitment to cleaner energy sources.

Local energy production continued to be based entirely on renewable sources, namely solar energy, reaching 241.70 MWh in 2025. This figure represents around 5.86 per cent of total consumption at the POPs, demonstrating dstelecom's ongoing efforts to ensure clean and sustainable energy production.

Total consumption at the POPs and the head office was 4,202.67 MWh in 2025, of which 4,127.44 MWh was accounted for by the POPs and 75.24 MWh by the head office. Taking into account the electricity generated by generators, amounting to 3.59 MWh, the total energy recorded stands at 4,206.26 MWh. Even so, consumption of non-renewable energy was negligible, accounting for just 0.09 per cent of the total.

In summary, the 2025 figures reinforce dstelecom's commitment to energy sustainability, reflected in a high proportion of renewable energy consumed, the continued local production of solar energy and a very significant reduction in the use of non-renewable sources.

Imported/purchased energy

Metrics	Units	2023	2024	2025
Biofuels	MWh	0	0	0
Renewable hydrogen	MWh	0	0	0
Waste (non-biomass)	MWh	0	0	0
Renewable electricity	MWh	3 612,36	3588	3 960,97
Renewable steam, heating and cooling	MWh	0	0	0
Coal	MWh	0	0	0
Diesel	MWh	0	0	0
LPG, butane or propane	MWh	0	0	0
Gasoline for engines	MWh	8,50698	149	3,59
Natural gas	MWh	0	0	0
Non-renewable hydrogen	MWh	0	0	0
Non-renewable electricity	MWh	0	0	0
Non-renewable steam, heating and cooling	MWh	0	0	0
Total energy imported/purchased	MWh	3 373,96	3737	3 964,56
% Imported/Purchased Renewable Electricity	%	99,74	96	99,91

Energy produced from non-combustible sources

Metrics	Units	2023	2024	2025
Biofuels (produced locally)	MWh	0	0	0
Geothermal	MWh	0	0	0
Hydroelectric power plant	MWh	0	0	0
Solar	MWh	246,9	235,7	241,70
Wind	MWh	0	0	0
Nuclear	MWh	0	0	0
Total energy produced on site	MWh	246,9	235,7	241,70

Energy consumed (summary table)

Metrics	Units	2023	2024	2025
Renewable energy consumed	MWh	3 612,36	3588	4 202,67
Consumption of non-renewable energy	MWh	8,5	149	3,59
Total energy consumed	MWh	3 620,87	3972,7	4 206,26
% Renewable energy consumed	%	99,76	90,31641	99,91
Total energy produced	MWh	255,41	250,58	245,29

ESRS E2-4

Waste					
Read Code	**Description**	**Unit**	**2023**	**2024**	**2025**
160216 / 170411	Fiber optic cable	t	39,06	110	95,18
170101	Concrete	t	0,76	9,74	9,04
200138	Wood	t	2,92	0	0,92
170904	Mixtures of construction and demolition waste that do not contain mercury, PCBs, or hazardous substances.	t	0,38	0,003	0,271
160601	Batteries	t	0	1,26	0
200140	In the year	t	0	1,386	0
200101	Paper and Cardboard	t	0	1,235	0
160214	REE	t	0	0,085	0
150106	Plastic Waste	t	0	0,08	0,12

In 2025, dstelecom remained committed to responsible waste management and the prudent use of water, two essential pillars for the sustainability of the company and the dstgroup.

With regard to waste, a total volume of 105.53 tonnes was recorded, a reduction compared with the 124.11 tonnes recorded in 2024. The main waste stream continues to be fibre-optic cable, at 95.18 tonnes, sent for incineration, followed by concrete, at 9.04 tonnes, and wood, at 0.92 tonnes.

Trace quantities of other waste streams were also recorded, namely chlorofluorocarbons, HCFCs and HFCs, totalling 0.27 tonnes, and plastic, totalling 0.12 tonnes. In 2025, no waste was classified as hazardous, reinforcing the control and traceability of the waste streams generated by dstelecom's operations.

ESRS E3-4

Water consumption (overall value dstgroup)	
Year	**m3**
2024	202,720
2025	635,650

With regard to water consumption, and given that dstelecom shares its offices with dstgroup, the figure recorded in 2025 was 635,650 m^3, compared with the 202,720 m^3 recorded in 2024.

This increase highlights the importance of continuing to monitor and optimise the use of this essential resource, promoting more efficient water management in shared spaces and in activities associated with the company's operations.

Waste — ESRS E5-5	Unit	2024	2025
Total volume of waste generated	t	**124,11**	**105,53**
Hazardous waste	t	**0**	**0**
Non-hazardous waste	t	**124,11**	**105,53**
Main waste streams			
Fibre optic cable	t	110	95,18
Concrete	t	9,74	9,04
Wood	t	0	0,92
Other waste	t	4,37	0,39
Waste treatment			
Sent for incineration (fibre optic)	t	**110**	**95,18**
└ with energy recovery	t	N/D	N/D
└ without energy recovery	t	N/D	N/D
Preparation for reuse	t	N/D	N/D
Recycling	t	N/D	N/D
Other recovery operations	t	N/D	N/D
Confinamento em aterro	t	0	0

Resource Inflows (ESRS E5-4)	Unit	2024	2025
Total fibre optic consumption	t	123	117
Total wood consumption	t	7	80
Total consumption of precast concrete products	t	285	206
Total consumption of ceramic products	t	0	0
Total consumption of metals	t	15	n/a
Total consumption of wood and wood-based products	t	7	n/a
Recycled materials	t	n/a	n/a
Production of recycled aggregates	t	0	0
Percentage of recycled aggregates incorporated	t	0	0

ESRS E2

poluição

ESRS 2 IRO-1

Topic
Waste

Materiality
●○○
Reduced

Ambition

- Development of a strategy for the efficient recycling of fiber optic cables, reducing the environmental impact and promoting the circular economy;
- Partnership with specialized companies for the reuse and recovery of fiber optic materials;
- Research into new technologies to increase the recycling rate and reduce electronic waste;
- Implementation of ESG criteria in the selection of suppliers that prioritize the recycling of materials.

Risks

- Difficulty in recycling due to the complex composition of fiber optic cables;
- High costs for advanced recycling processes;
- Possible impact on reputation if fiber optic waste is not managed correctly.

E2-1

We have been successfully implementing the ISO 14001 standard for over 5 years, integrating all aspects of environmental management into our management system. This structured approach allows us to ensure compliance with legislation and best environmental practices at all stages of our projects, from planning to the final phase.

Our system covers all aspects of pollution prevention, from fleet control to rigorous waste management and the circular economy. Each of these elements is formalized in our procedures, guaranteeing continuous improvement in line with the requirements of ISO 14001.

Our environmental policy, which has already been consolidated and is constantly being updated, reflects this commitment and is audited internally and verified by external entities, reinforcing the transparency and effectiveness of our actions.

2-2 E2-3

Over the years, we have done away with water bottles and jugs in our restaurants, a measure that has allowed us to reduce the amount of plastic waste produced by more than 1500 kg. To reinforce this commitment, all employees now use their own coffee cup and metal water bottle, promoting more sustainable habits in everyday life. Other targets and actions to be implemented to meet them will be included in our environmental policy and will cover air, waste and soil.

E2-6

In the Risks and Opportunities matrix, we have identified significant financial impacts arising from pollution-related risks and, as a mitigation measure, we have set up a monetary guarantee with the Portuguese Environment Agency to cover any environmental liabilities.

As part of our planned investments, we have planned to replace the gases used in the POP plants' air conditioning machines with alternatives that have a lower global warming potential, in line with best environmental practices and helping to reduce the associated environmental and financial impacts.

These actions reflect our commitment to proactively managing environmental risks, minimizing future operating costs and aligning our strategy with regulatory requirements and stakeholder expectations.



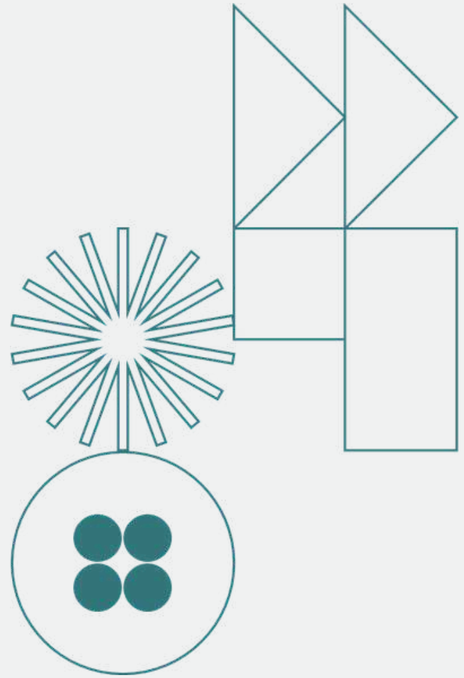


STBI's subscribers

Our commitment to the **Science Based Targets Initiative** (SBTI's) is reflected in our plan to reduce emissions from scopes 1 and 2 (direct emissions) by 46% by 2030, as well as aiming for a 90% reduction in emissions from scopes 1, 2 and 3 by 2050.

These targets not only reflect our determination to mitigate the environmental impacts of our operations, but also demonstrate our leadership in promoting sustainable and low-carbon business practices.

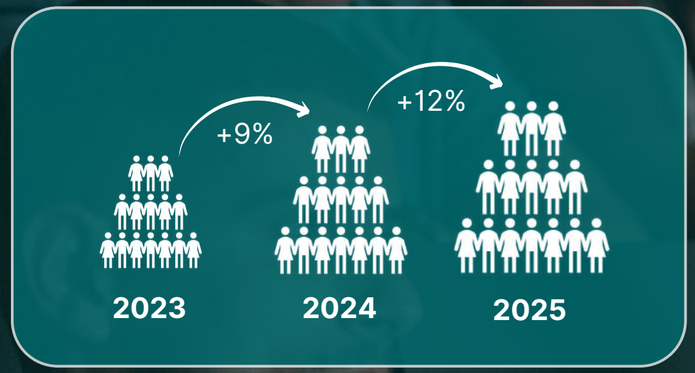
social.



the key to our success

social performance

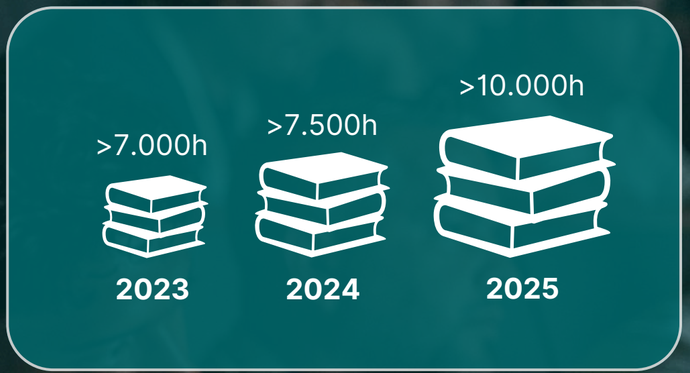
Número de trabalhadores



Fatalidades

2023	2024	2025
0	0	0

Horas de formação



In 2025, dstelecom continued to show positive progress in its social performance, recording a 12 per cent increase in the number of employees. This increase reflects the expansion of our operations and our ongoing commitment to creating stable, skilled jobs.

At the same time, we maintained an exemplary record in terms of workplace safety, with zero fatalities during the year, reinforcing the priority we place on the protection, prevention and wellbeing of our employees.

In terms of training, dstelecom exceeded 10,000 hours of training in 2025, demonstrating a consistent focus on skills development, team enhancement and preparation for the organisation's future challenges.

These results highlight dstelecom's commitment to responsible growth, where people, safety and skills continue to occupy a central place in its sustainable development strategy.

ESRS S1

social contract with employees

ESRS 2 IRO-1

Topic
Career Plan

Materiality
●●●
High

Topic
Remuneration and working conditions

Materiality
●●●
High

Topic
Impact on communities: activism and social activities

Materiality
●●○
Moderate

Topic
Benefits

Ambition

- Continuation of the career plan in order to retain the most talented workers through professional development, training and compensation policies;
- Development of a work-life balance policy;
- Adoption of LivingWage;
- Adaptation of recruitment processes to the company's identity;
- Creation of a childcare centre for employees' children and grandchildren.

Risks

- Increased costs related to non-compliance with commitments to clients (price, quality, deadline) caused by a lack of labour;
- Increased recruitment costs, more time spent searching for talent;
- Decreased ability to bid for projects/tenders;
- Increased costs of fines for legal non-compliance.

social contract with employees

S1-1 S1-15



career development plan

The career development plan is an essential tool for the company and its employees. By mapping out all the positions, the company makes it easier to place the right people in the right jobs. We also encourage internal mobility and incentivise training for all employees

Our priority of working on a career development plan helps to chart a path and thus manage expectations while avoiding negative feelings such as boredom, stagnation, frustration, stress and conformism.

At dstgroup our ambition is to complete the career development plan that we have already started with our employee assessments, mentoring programme and internal mobility vacancies.

S1-1 S1-8 S1-10 S1-11



remunerations

We believe that a necessary condition for improving our community and society is to increase wages.

We want to create a movement that will increase salaries at a faster rate than negotiated in social dialogue. We believe that this is the only way to improve people's lives and contribute to the first of the UN's Sustainable Development Goals: eradicating poverty.

S1-1



social activities

Our values are something we don't negotiate. It's essential that we all feel them. Social activities are a humanising factor in working relationships, they are a way of imprinting our values indelibly on everyone who takes part in them. They are also a way of integrating and feeling the community spirit that exists in our group.

The activities we promote range from sports tournaments to gatherings of classic cars, as well as larger get-togethers such as Christmas dinner, St John's Day, Magusto or Sunset.

We also have a nightclub, called Laboratório, on our campus for our employees to organise parties, and we take care of the catering and production.

S1-2 S1-3 S1-4



working conditions

We know that moments of extreme tension can arise in the workplace, but almost everything has a solution and it is therefore imperative that our relationships do not deteriorate.

Our relationships are governed by the 14 commandments of our Code of Conduct, which can be found here. In addition, we have communication channels so that all interested parties can make their voices heard.

Sometimes digital channels can't replace face-to-face conversations, which is why we created the ‘I Need to Talk to You’ spot on our campus. It's a place of co-operation and multi-sensory discussion where we'll stop to listen to each other's secrets and where we'll all win.

social contract with employees

ERS S1-13

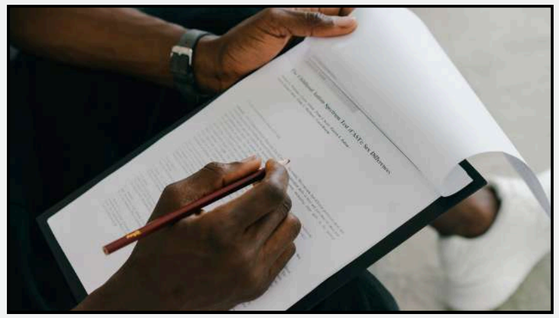
S1-1



social activism

Throughout our facilities there are mirrors that ask anyone who comes across them ‘Why not me?’. This is a question we want all our workers to keep in mind in their daily lives. We want everyone to feel capable of changing the world, their world and everyone else's world.

We continue to encourage reading habits through the ‘Furious Reading on Thursdays’ series, created in 2021. Every Thursday, Clarisse, our human development manager, and her faithful friend Leopoldo bring our employees excerpts from books, chronicles and articles suggested by the employees themselves to be discussed in a shared reading format. The main purpose is to enrich each person's critical spirit and, consequently, that of the group. Ultimately, we want everyone to feel co-responsible for their neighbour and for society.



regular performance evaluation

We adopt a fair performance appraisal system that recognises individual merit. Our assessment criteria are based on competences and contributions to the work team, ensuring that everyone is assessed in an impartial manner.

In addition, we provide constructive feedback to drive each member's continuous development. To ensure an even more balanced and transparent approach, we carry out 360º evaluations, promoting an environment of mutual improvement, open dialogue and greater alignment with the team's expectations.



gender equality

We are committed to promoting gender parity and equal opportunities in the workplace.

By analysing the results of the annual performance appraisal by gender, we monitor the professional development and recognition of employees in a transparent manner, monitoring any differences and promoting actions that ensure fair and balanced treatment, contributing to an inclusive organisational culture in line with ESG best practices.

Regular performance evaluation	2023	2024	2025
Female permanent employees subject to performance assessment	67	66	83
Average rating	75,04	77,99	n/a*
Male permanent employees subject to performance assessment	138	161	193
Average rating	80,46	81,27	n/a*

*Data not available.

benefits

It's impossible for us to fulfil our mission if our teams don't give their best. We know that people thrive when they feel more satisfied.

With that in mind, we offer a range of benefits to our employees so that they can live healthier, more active, more cultured, happier and less hurried lives. Our benefits programme is reviewed regularly to adapt to the needs of our employees.









active life

- Football pitches
- Tennis courts
- Paddle courts
- Fitness classes available on campus
- Free gym places
- Protocols with golf clubs

health and well-being

- Community garden
- Protocol with PROVE (baskets of vegetables produced by local producers)
- Manicure service
- Hairdressing services









benefits

education

Protocols with:

- Nurseries and public schools
- Programming technology schools for children and young people

ócio, lazer e cultura

- Disco lab on campus
- Holiday camps for our workers' children
- Book offer and library with thousands of books
- Tickets for shows at Theatro Circo
- Free access to the zet gallery
- Hundreds of works of art scattered around the campus
- Protocols with travel agencies, hotels and restaurants
- Protocols with bookshops
- Protocol with the Serralves FoundationCreches and public schools
- Programming technology schools for children and young people

ESRS S1-9

social performance indicators

In 2025, we took important steps towards building a safer and more inclusive working environment.

Safety:
Zero fatalities: we have maintained our commitment to safety, recording zero fatalities, which demonstrates our focus on protecting our employees.

Commitment to wellbeing:
Lost time due to illness: despite a slight increase in the number of days lost due to illness, we are investing in health and wellbeing programmes to promote the health of our workers and reduce absenteeism.

Employees	2023	2024	2025
Total employees	226	247	276
Employees under 30 years old	74	65	74
Employees aged between 30 and 50	138	170	185
Employees over 50 years old	14	12	17
New employees	35	36	44
Employees who left the company	18	16	15
% of female employees	34%	32%	30%
% of male employees	66%	68%	70%
% of men in leadership positions	70%	70%	70%
% of women in leadership positions	30%	30%	30%

Employees				
Métricas	**Unidades**	**2023**	**2024**	**2025**
Fatalities	Número	0	0	0
Lost-time injuries	Número	7	9	9
Total recordable injuries	Número	8	16	16
Near-miss incidents	Número	4	1	1
Hours worked	Número	359506	471860	448299
Days lost due to occupational accidents (includin	Número	145	229	345
Sick leave days	Número	530	685	1117
Medical consultations	Número	152	166	206
Number of days lost due to unexcused absence	Número	0	0	0

We believe that the safety, diversity and well-being of our employees are fundamental pillars for the success of our company.
We will continue to invest in initiatives that promote a positive and inspiring work environment.

ESRS S1

people management

ESRS 2 IRO-1

Topic
Human rights

Materiality
●●○
Moderate

Topic
Attracting and retaining talent

Materiality
●●○
Moderate

Ambition

- Continued efforts to integrate young people into the job market through partnerships with universities;
- Development of a work-life balance policy.

Risks

- Reduced productivity due to absence of workers due to mental health;
- Increased absenteeism rate;
- Loss of innovation inherent in young people.

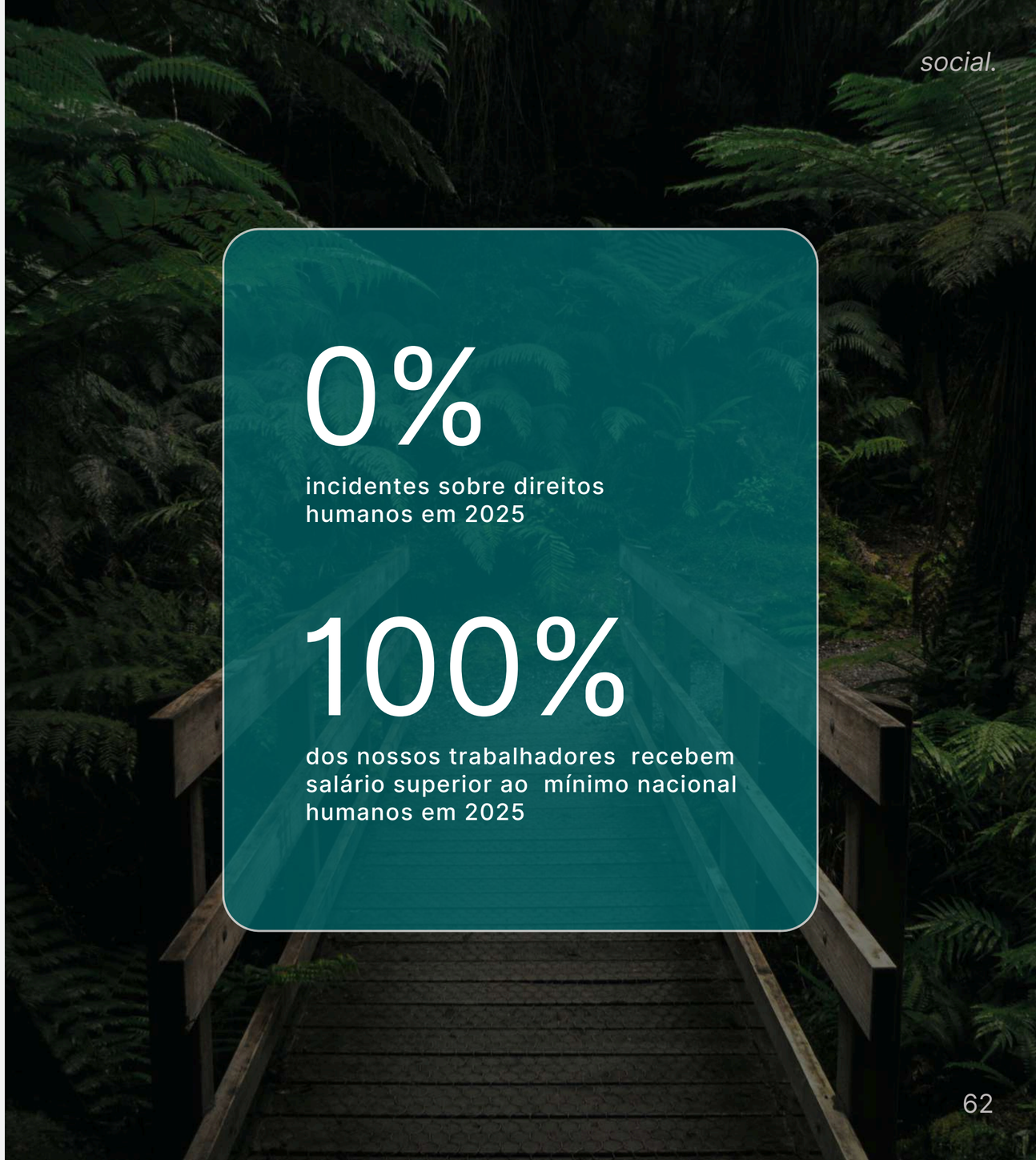
people management

The best thing we can do is invest in those who work with us. In fact, the success of any organisation depends on a clear and intelligent people management policy.

In today's highly volatile environment, we are committed to stable employment policies that give our workers security, favouring open-ended contracts. We want to ensure good financial conditions that allow us to improve the quality of life of our workers and their families - guaranteeing, first and foremost, that all our workers earn more than the national minimum wage. We have carried out questionnaires and audits of suppliers to ensure ethical practices and responsible behaviour.

S1-17

We did not record any incidents, complaints or serious human rights impacts and incidents in 2025.



0%

incidentes sobre direitos humanos em 2025

100%

dos nossos trabalhadores recebem salário superior ao mínimo nacional humanos em 2025

ESRS S3 S4

customer experience

ESRS 2 IRO-1

Topic
Protection and customer service

Materiality
●○○
Reduced

Ambition

- Being leaders in customer experience, offering a personalised and efficient service;
- Investing in advanced technologies to guarantee maximum protection for our customers data.

Risks

- The increase in cyber threats can jeopardise the security of customer data;
- Service failures can result in a loss of customer trust and loyalty;
- Not complying with regulations such as the GDPR.



customer experience

At dstelecom, protection and customer service are more than just responsibilities, they are fundamental pillars of our identity. We are committed to excellence in every interaction, always putting our customers' interests and security first. Although we are in the B2B business, we understand the importance of understanding the needs of both the end-user and the operators who are our customers, in order to promote fibre services and develop services that add value to everyone involved. That's why we consider ourselves to be in the B2BC (business-to-business-to-consumer) business. We invest in providing excellent service not only to our customers (operators), but also to our customers' customers (end-users). With the aim of mitigating digital illiteracy and aligning the interests of end-user customers with operators, we have set up a customer service and support for end-user customers, whether via the website, email or telephone, to clarify coverage doubts, support contact with operators or even help contract services with our customers.

We strive to offer exceptional service, trusting that with each advance we will strengthen our position as a reliable company in the market. With service levels of excellence, aligned with the values of ethics and transparency that guide dstelecom, we are creating value and an exceptional experience for the end-user.

ESRS S1

diversity, equality and inclusion

ESRS 2 IRO-1

Topic
Diversity, equality and inclusion

Materiality
●●○
Moderate

Ambition

- Continuous improvement of all the issues addressed by our DEI Committee.

Risks

- Increased costs with fines for legal non-compliance (pay gap, parity, human rights);
- Reputational damage for not adopting equality policies;
- Loss of competitiveness.

diversity, equality and inclusion

S1-1

dstelecom has Diversity, Equality and Inclusion (DEI) in its DNA. We believe in the power of diversity to strengthen the company and we promote equal opportunities, regardless of gender, race, religion, sexual orientation or physical limitations.

We value a heterogeneous work environment, where different life experiences enrich the team and drive innovation. This commitment is essential to attracting and retaining talent, ensuring that everyone is treated with respect, dignity and fairness. From the outset, dstelecom has fought discrimination and promoted an inclusive workplace where everyone can give their best. Our approach is based on three fundamental principles:

- **Diversity**: More than acceptance, we value each person as an individual with their own personality, experiences and culture. Our drive for innovation and success is driven by our ability to embrace diversity, different perspectives and approaches. We believe and advocate that everyone should feel free to have their say and be valued for their contributions.
- **Equality**: We promote equal opportunities, remove barriers, eliminate discrimination and guarantee equal access for all employees, regardless of race, gender or age.
- **Inclusion:** We create a work culture where differences are not merely accepted, but valued. Everyone has the opportunity to develop consistently and adhere to dstelecom's Values. Our goal is to be a company where people feel respected, valued, involved and connected to our success.

S1-6

Diversity and Inclusion	2024	2025
Total employees with disabilities	3	4
Proportion of employees with disabilities	1%	1%
New hires of employees with disabilities	0	1





health and safety

It is our constant concern that our employees feel safe and healthy in the workplace. In some of our business areas, this is an issue of particular importance due to the additional safety risk that the activity itself represents.

In accordance with the conventional and specific legal framework applicable to Safety, Hygiene and Health at Work, we have defined a prevention and protection policy that favours active attitudes towards identifying, analysing and assessing occupational safety and health conditions. To this end, the most foreseeable risk situations are analysed in advance and the corresponding preventive measures are implemented, with a focus on training and making all employees responsible. To this end, and in order to minimise accidents at work, Risk Prevention campaigns and training sessions are held frequently, with a special focus on identifying hazards and associated risks and on operational control measures relating to collective and individual protection. Various drills and internal awareness and educational campaigns are also organised.

As far as health is concerned, our focus is on promoting health and preventing illness for all our employees. To this end, we have a health centre, the ‘Centro de Saúde Vânia Xisto’, which offers full time monitoring by a doctor and a nurse in the field of curative medicine and general medicine, as well as dental medicine, completely free of charge for all employees, and nutrition and psychology consultations. Life insurance and health insurance are also provided for everyone.

At the same time, we also work on prevention, promoting physical exercise. For this reason, the group has signed protocols with gyms from the north to the south of the country (considering our displaced employees), as well as providing an aerobic maintenance circuit and free access to outdoor classes on our campus with a personal trainer.



Maria Ondina Braga Room

The breastfeeding room continues to provide the greatest comfort for mums. The room is equipped with a fridge, microwave, nappy changing station, television and armchairs.

With this intervention, we want to ensure that there are no barriers to breastfeeding, even after parental leave has ended.



“Toda a Saúde” campaign

The in-house campaign ‘Toda a Saúde’ runs for a month and, through various initiatives, seeks to make our employees aware of the need to take care of their health. This year we wanted to focus on mental health.

According to the WHO, more than 1 billion people in the world suffer from some kind of mental disorder. According to the same study, the number of people with depression and anxiety increased by more than 25 per cent during the first year of the pandemic. Treatment for mental illness is not only still stigmatised, it is also practically inaccessible for many. In Portugal, the average waiting time for a speciality consultation in the National Health Service is often more than 60 days.

Realising this, we brought in various specialists to talk to us about the symptoms, how to identify them, how to prevent them and how to act. Our concern for mental health doesn't end there, however. This year, we became members of the Portuguese Alliance for the Promotion of Mental Health in the Workplace and we also offer free psychology consultations at our Vânia Xisto health centre.

ESRS S1

training

Professional training is a key investment for business development. The performance of professionals with further training or experience is essential for an organisation to achieve its goals and is a critical factor in the success of knowledge-based businesses.

At dstelecom, we deeply value the continuous development of our employees. We believe that excellence in training is the basis for innovation and the quality of our services. We provide robust, personalised development programmes that not only enhance technical and management skills, but also promote personal growth and leadership.

>10.000h

formação aos nossos trabalhadores

ESRS 2 IRO-1

Topic
Training

Ambition

- Increasing the number of hours of training per employee;
- Promoting postgraduate training, vocational master's degrees, doctorates and CTeSPs among employees.

Risks

- Decreased ability to bid for projects/tenders;
- Increased costs related to non-compliance with commitments to clients (price, quality, deadline) caused by a lack of labour or unskilled labour.

partnerships with educational institutions

We foster a close relationship and close collaboration with the Academy, through which multidisciplinary teams are created that catalyse other projects in the organisation.

The partnership with the University of Minho, which dates back to 2017 with various initiatives to support research, is renewed annually with the presentation of challenges for research projects and the hosting of internships to integrate research into the real needs of day-to-day operations.

In addition, and with a long-term perspective, we have signed co-operation protocols with vocational education entities in order to strengthen the training offer with technical resources and know-how suited to the demands of the networks of the future, as well as other professional areas, such as the Moura School Association, Vila Viçosa School Association, Braga Vocational School and Amar Terra Verde Vocational School, where, in addition to hosting internships, the inclusion of training activities in the school calendar is considered.

In partnership with the Polytechnic Institute of Cávado and Ave, we created the Higher Professional Technical Course (CTeSP) in Network Management and Advanced Telecommunications, with content based on the dstelecom network architecture, but also capable of handling other fibre optic network architectures, which began its second edition in 2024.



training as a solution

We believe in the benefits of lifelong learning - not only of technical knowledge, but also of transversal skills that result in stimulating each employee's real abilities and, ultimately, their self-confidence.

The annual training plan, drawn up on the basis of a survey of employees' training needs, is the cornerstone of training management. The training solutions developed focus not only on hard skills, but also on soft skills:

- Postgraduate Diploma in Philosophy;
- Training in Neuroscience;
- Training in Leadership;
- Training in Mental Health.

Also as a way of fostering a culture of innovation and learning, within the scope of training and qualifications, we invest in training programmes in various areas of knowledge - finance, management, strategy and humanities - with the Porto Business School, the Portuguese Catholic University and the University of Minho's Executive School. In addition, we promote free access to specialised master's and doctoral programmes.

The feedback we get from our employees is very positive: they all agree that training is essential for better professional performance and, consequently, for expected career progression.



training indicators

At dstelecom, we believe that investing in the development of our staff is fundamental to our long-term success and sustainability.

During 2025, we implemented an extensive training programme that reflects our commitment to continuous learning and professional growth. Our training programme covered a wide range of topics, from health and safety at work and sector-specific technical skills to personal development and wellbeing.

Looking ahead, we will continue to evaluate and adapt our training programme to ensure that we are preparing our team for the constantly evolving challenges of our sector, always with the aim of promoting sustainable growth and shared success.

Type	Hours	Male	Female
Cultural	3815	2147	1668
Technical	2774,7	1486,75	1287,98
Safety Certification	1572	1554	18
Foreign Language	1426,8	891,75	535
Onboarding	899,3	721,08	178,25
Safety	445	271,5	173,5
Technical Certification	177	169	8
Total 2025	11109,8	7241,1	3868,7

Training	Type	Horas
dstelecom English	Foreign Language	1382,5
Philosophy for the New Century	Cultural	1368
Fundamental Philosophical Controversies	Cultural	1050
RC-SIRF Safety Renewal	Safety Certification	824
Welcome Aboard	Onboarding	756
Philosophy for the New Century 2024/25	Cultural	432
Compliance and Corruption Prevention	Technical	362
Sound Technician	Cultural	260
Oral and Written Communication Techniques	Technical	250
Intermediate Excel	Technical	225
Neuroscience: Understanding the Brain	Cultural	216
CS-SIRIRF Safety Certificate	Safety Certification	200
Electrical Risks and Workplace Safety	Safety Certification	196
Spreadsheets	Technical	150
Use of Ladders and Stepladders	Safety Certification	144
7th Edition Painting Course	Cultural	136
Stress and Conflict Management	Technical	128
ITED Renewal	Technical	120
HR Onboarding	Onboarding	109,5
Mental Health First Aid	Safety	105

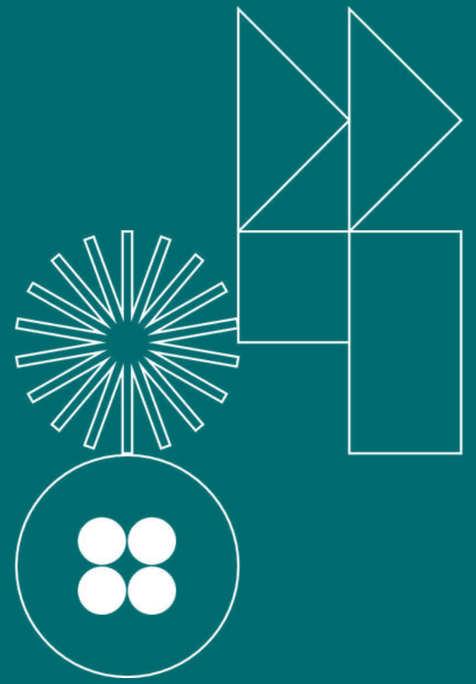
DEI Survey

With the aim of listening to, interpreting and rigorously valuing the contributions of dstelecom's staff, a framework study was carried out on the DEI questionnaire in relation to the requirements of ESRS S1-1 to S1-17. This study aims to provide a structured and transparent analysis of the results, identifying the most relevant findings regarding DEI policy, active listening, reporting channels, inclusion, diversity, development, remuneration, wellbeing and a 'speak-up' culture.

The study is based on a sample of 72 employees, always taking into account valid responses per metric and respecting the specific denominator for each indicator. Where the questionnaire does not collect direct data for certain requirements, the respective gaps in coverage have been highlighted and supplemented using appropriate internal sources. Full details of the mapping can be found **here**.



governance.



management beyond duty

ESRS G1

ethics and integrity

ESRS 2 IRO-1

Topic
Privacy and processing of personal data

Materiality
●●○
Moderate

Topic
Compliance with environmental and socio-economic legislation

Topic
Anti-corruption policies

Topic
Mechanisms against market manipulation

Topic
Cybersecurity

Topic
Accessibility and quality of services

Materiality
●●○
Moderate

Topic
Governance and corporate culture

Materiality
●○○
Reduced

Topic
Transparency and good governance

Ambition

- Training plan specifically related to ethics in order to prevent irregularities, especially corruption;
- Inclusion in insurance policies of cover against cyber-incidents;
- Training and awareness-raising plan on cybersecurity;
- Analysis of new markets;
- Development of a cybersecurity management model;
- Development of a medium/long-term ethics strategy;
- Creation of an internal channel for employees to raise their doubts and concerns, fostering an open culture;
- Creation of a day dedicated to ethics;
- Training in Corruption and ESG matters.

Risks

- Reduced business opportunities due to non-compliance with ethical and sustainability requirements;
- Reputational damage if confidential information is leaked that exposes business stakeholders;
- Increased costs of fines for non-compliance;
- Theft of know-how and/or intellectual/industrial property and/or confidential information due to cyber-attacks;
- Serious damage to corporate reputation due to compromised stakeholder privacy;
- Impact caused by fraud;
- Increased costs of ransomware and other attacks.



G1-1 G1-3

At dstelecom we place great value on honesty, integrity and transparency in the way we operate.

Every day we work to build relationships of trust and continuity with our stakeholders and all those with whom we interact.

We disapprove of any kind of illicit, immoral or incorrect behaviour, as well as actions and attitudes driven by purely personal interests and/or those of third parties.

We believe that ethics is a fundamental pillar for the sustainability of our business and that only by basing our actions on these principles will we be able to become a sustainable company that is recognised both nationally and internationally.

G1-1 G1-3 G1-4

privacy and processing of personal data

At dstelecom, we realise that the use of personal data requires trust. That is why we have defined a Personal Data Protection Policy. We are subject to the highest privacy standards and use personal data only for clearly identified purposes and in accordance with data protection rights.

The confidentiality and integrity of personal data is one of dstelecom's main concerns. Our Privacy Policy sets out and describes how we use the personal data of stakeholders and other interested parties.privacy and processing of personal data.

Cybersecurity

The presence of digital technologies in our lives has increased exponentially in recent decades. Today, practically every action we take depends on or communicates with a computer system. This scenario is highly prolific for cybercrime and cyberattacks, which are considered to be one of the top ten Risks facing our planet, both in the long and short term. Aware of this, we have defined a cybersecurity roadmap and will be implementing new Security Information and Event Management (SIEM) tools over the next few years. In parallel, we will continue to carry out tests for improper access to our infrastructures, both physical and in the cloud.

This year, we started social engineering actions (phishing simulation) via SMS or emails to create more defences for our employees against this type of attempted attack that can infiltrate our infrastructures.



Ethics provider

We have an Ethics Ombudsman who plays a fundamental role in defining our ethics strategy, as well as developing policies and initiatives that promote ethical behaviour among all our employees.

In addition, the Ethics Ombudsman also has the task of receiving, analysing and guiding all concerns and doubts that our employees may have on any ethical matter, safeguarding the anonymity and confidentiality of any communication.

Governance and corporate culture

At dstelecom, we stand out for our robust governance and exemplary corporate culture. Committed to ethics, transparency and innovation, we adopt management practices that promote sustainability and social responsibility. The active involvement of our employees and our continuous commitment to training and personal development are essential pillars that strengthen our position in the market.

In line with dstgroup's values, we reaffirm our commitment to the future, contributing to a fairer and more sustainable business environment.

Code of Ethics and Business Conduct

At dstelecom we strive to do good business and maintain great relationships with all our stakeholders. To this end, it is essential to always have in mind a set of strong principles that guide us in our professional relationships.

To this end, a Code of Ethics and Conduct has been drawn up, as part of the Supplier Sustainability Manual, which defines the set of business values, principles, practices and attitudes applicable to all dstelecom stakeholders in all their commercial and institutional relationships, whether internal or external.

A fundamental part of the process is that any attitude, behaviour or activity that is in conflict with the values and principles set out in the Code of Ethics can and should be reported as soon as possible, through the mechanisms set out in that document. We ensure that the content of communications received is examined with the utmost confidentiality at all stages of the investigation.

G1-1 G1-3

report of irregularities

dstelecom has set up a Whistleblowing Channel for reporting irregularities. This channel protects the identity of the whistleblower and allows them to contact the group anonymously if they so wish. Only the person responsible for managing the whistleblowing channel has access to the identity. None of the information is shared internally, except when the support of any department of the organisation is required as part of the investigation, in accordance with Law 93/2021. However, even in these cases, the information is shared anonymously.

Up until 2025, we had not received any complaints.



anti-corruption policies

Our corporate values, principles, practices and attitudes are based on the rigour and transparency we cultivate in all our interactions. It is our intention to encourage all our partners to share this sustainable development-orientated culture with us.

Our Plan for the Prevention of Risks of Corruption and Related Offences (PPR), which seeks to comply with the guidelines of Decree-Law 109-E/2021, is seen as an opportunity for internal reflection to improve existing practices. This document incorporates a risk management methodology and involves a special effort to implement and constantly update it.

The challenge we face on a daily basis is to publicise it and get all our employees, especially leaders, to identify with our thinking and our plan, becoming active agents in this risk prevention process. The same work of publicising and raising awareness is carried out with all those who work with us, be they suppliers, service providers or other partners.

ESRS G1-3 G1-4 G1-5 G1-6

Governance	2023	2024	2025
The organisation is subject to legal requirements regarding the protection of whistleblowers	Yes	Yes	Yes
Existence of policies to protect whistleblowers	Yes	Yes	Yes
Percentage of risk functions covered by training programmes	100%	100%	100%
Number of convictions for violating anti-corruption and anti-bribery laws	0	0	0
Amount of fines for violation of anti-corruption and anti-bribery legislation	0	0	0
Number of confirmed cases of corruption or bribery	0	0	0
Number of confirmed cases in which own employees were dismissed or subjected to disciplinary sanctions for acts of corruption or bribery	0	0	0
Number of confirmed incidents concerning contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	0	0	0
Financial political contributions made	0	0	0
Political contributions in kind made	0	0	0
Percentage of payments in line with the company's general payment conditions	100%	100%	100%
Legal proceedings currently underway for late payment	0	0	0

innovation

Within our strategic framework, strengthening our activity in the field of Innovation and Development has been a ubiquitous and essential mission to ensure sustainable and competitive growth.

We believe that innovation must be democratic and come from all our employees.

Topic
Sustainable and innovative offer

Materiality
●●○
Moderate

Ambition

- Continuous goal of creating added value that can guarantee business continuity in a sustainable and innovative way;
- Continue to innovate following the methodologies of the 2021 NP 457 standard in Research, Development and Innovation Management, which dstelecom has been certified in since 2024;
- Ensure that all employees actively participate in the company's innovation processes across the board.

Risks

- Not all innovation projects produce the expected results or are mature enough for immediate application in the business.

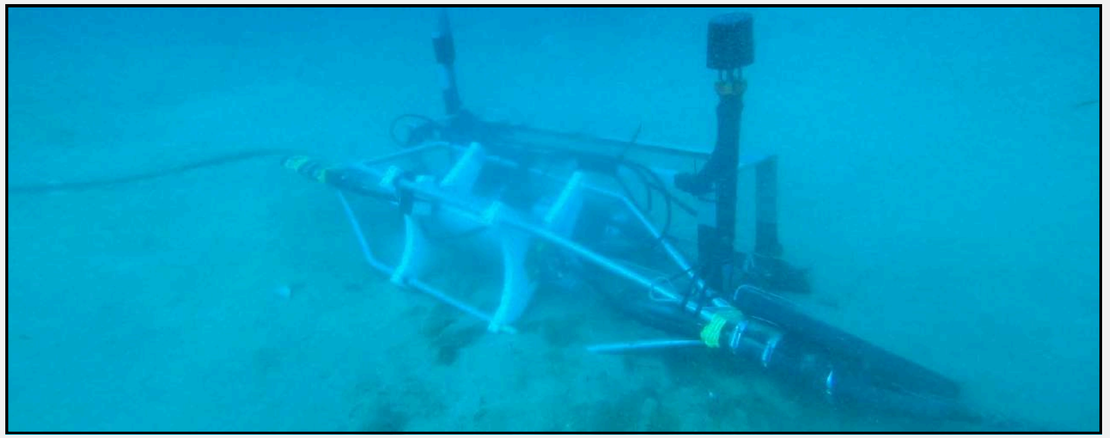
I&D projects

Culture of innovation

At dstelecom, innovation goes far beyond technology. It represents our dedication to being the technological reference that contributes most to the integral development of low-density population areas, promoting a future where connectivity is a universal right, accessible to all, regardless of their geographic location.

We recognize that the sustainability of our business is intrinsically linked to the ability to enhance the perceived value of our products, processes and services provided to our stakeholders. Our vision is to be a leading innovative company in anticipating and meeting stakeholder expectations, continuously developing and improving innovative, differentiated and customized solutions.

We adopt an innovation strategy that aligns with our global strategy, vision and mission, focusing on growth in different territories - land, sea, air and space - in any region of the planet.









energy



industry 4.0



circular economy



space and sea



digitization and IoT



productivity

public relations

Establishing close relationships with all our stakeholders is essential to the continuation of our activity and the growth of the value of our business.

In all our business areas and in all the initiatives in which we are involved, we are committed to making an impact and leaving a positive mark.

Topic
Value chain reliability: customer satisfaction, positive external image and good relations with stakeholders.

Materiality
●○○
Reduced

Ambition

- Submission of the ESG strategy and report to rating indices in the area;
- Collection of feedback/satisfaction surveys from stakeholders.

Risks

- Reduction in business opportunities due to weak relationships with customers, investors and academies.

Customer satisfaction

One of the objectives of our management policy is the satisfaction of our customers. From commercial performance, to the quality of materials, compliance with deadlines and environmental, health and safety requirements, we are interested in our customers feeling satisfied at every stage of a project in which we are involved. In order to measure our performance, as soon as we have completed our intervention in projects, we ask our customers to respond to a satisfaction survey where they can explain the positive and negative aspects of their experience with us.

Positive external image

Our good reputation is a guarantee of the rigor with which we apply our vision every day. We like to be recognized as a cultured, cosmopolitan and cool company. This image that we project creates a feeling of admiration and trust abroad. However, more important than this feeling, this image is a driving force for a paradigm shift in the business world.

Good relations with stakeholders

Just like our relationships with our employees, our relationships with other stakeholders are also guided by the 14 commandments of our Code of Ethics and Conduct. We believe in dialogue and want to hear what everyone we interact with has to say. In addition to the Materiality consultation, we have open communication channels such as contact forms on our websites, email or social media.



dstelecom achieves a score of 99% in the GRESB and strengthens its position amongst Europe's most sustainable operators

dstelecom has just been ranked in the Global Real Estate Sustainability Benchmark (GRESB) 2025 as the second most sustainable fibre network operator in Europe, with a score of 99 per cent and the maximum 5-star rating.

The company also took first place in the Performance Score (out of 651 organisations), a result that assesses the practical impact of the ESG measures implemented.

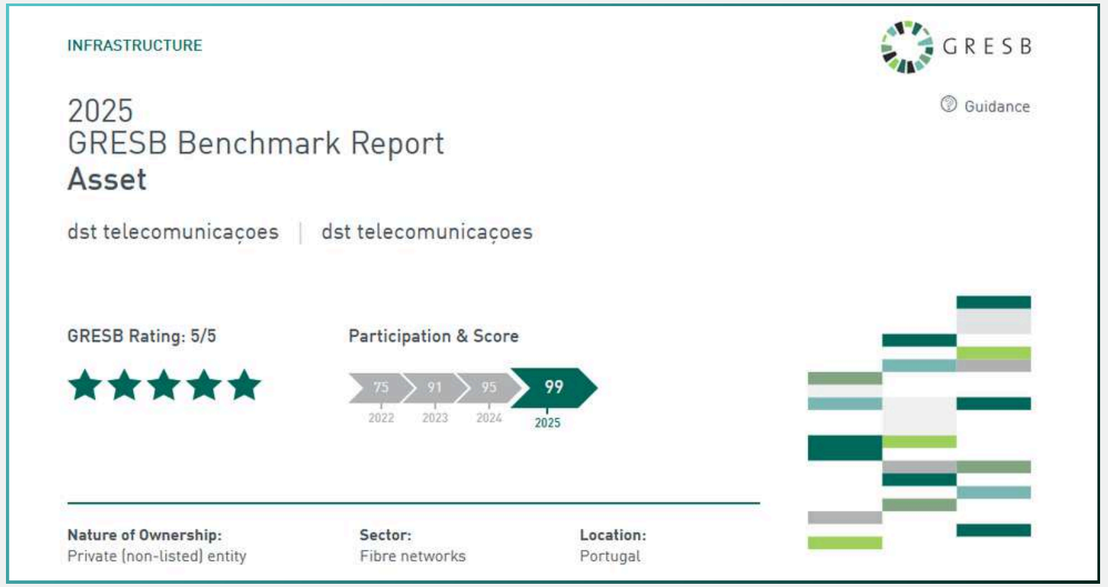
An internationally recognised achievement

GRESB is an international organisation which, since 2009, has been providing standardised and validated data on Environmental, Social and Governance (ESG) criteria to the financial markets. Its assessments have become a global benchmark for sustainability, analysing thousands of companies across different sectors every year. dstelecom voluntarily underwent this assessment, reinforcing its commitment to transparency and the continuous improvement of its practices.

The methodology assesses aspects such as energy efficiency, the reduction of greenhouse gas emissions, resource management, diversity and inclusion, health and wellbeing at work, as well as transparency and good governance practices. Achieving 99 per cent in this global benchmark means being aligned with the highest international standards, positioning dstelecom as a European example of good sustainability practices.

Sustainability as a strategic commitment

At dstelecom, sustainability is an integral part of our business strategy. It is present at every level of the organisation, from the way we manage our resources to the way we value our people and ensure transparency in our practices. This integrated approach ensures that the company grows responsibly, creating value for the sector, for society and for the environment.



Pedro Neves



ESG & Compliance Specialist

2025 marked another step forward in the evolution of dstelecom's ESG strategy. Following a period characterised by the consolidation of processes and commitments, this was a year of deepening our approach: we sought to integrate sustainability ever more closely into the way we assess risks, make decisions and plan for the organisation's future.

Throughout the year, we continued to strengthen our actions across the various ESG dimensions, closely monitoring our performance, identifying opportunities for improvement and seeking to respond in an increasingly structured manner to the expectations of our stakeholders. Rather than merely meeting requirements, the aim has been to build a consistent, measurable approach capable of generating long-term value.

This journey was also reflected in external recognition of the work carried out. Progress in sustainability assessments, the strengthening of sustainable procurement practices and ongoing work on environmental, social and governance (ESG) issues, as well as diversity and inclusion, demonstrate an organisation that is increasingly well-prepared to respond to the challenges facing the sector and society.

At the same time, 2025 was also a year of preparation for an increasingly demanding regulatory and business environment. We continued to align our approach with international best practices and benchmarks, enhancing the quality of information, our monitoring capabilities and the involvement of the organisation's various departments. Sustainability is, increasingly, a shared responsibility that cuts across the whole of dstelecom.

None of this progress would be possible without the contribution of the people who, day in, day out, turn commitments into action. I would like to express my gratitude to everyone who participated, challenged the status quo, collaborated and helped to bring about improvements. We enter the next cycle aware that there is still much to be done, but also confident that we are building an increasingly solid foundation for a more sustainable, resilient and future-ready dstelecom.

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people are our greatest
and most important asset

dstelecom

Page	Code	Topic	Overview
3	ESRS 2 – BP-1 / BP-2	CEO Message	ESG commitment, first Sustainability Report, GRESB, Great Place to Work, reforestation, Energy Management Committee, ISO 20400, SDGs and SBTi.
4	SBM-1	Mission	Eliminating geographical barriers and building a digital world.
5	SBM-1	Vision	Developing open communications networks sustainably, particularly in low population density areas.
6	SBM-1	Purpose	Improving quality of life, ensuring connectivity and contributing to a better society.
7	SBM-1	Our History	Foundation, network expansion, growth and business model.
8	SBM-1	2025 in Numbers	Key indicators for the year, presented in a summary format.
9	SBM-2	Stakeholders	Identification of stakeholders and value creation approach.
10	BP-1 / BP-2 / SBM-1	Shareholder Structure	Shareholder structure and corporate framework.
11	SBM-1	2025 in Numbers	Revenue, employees and training hours.
12	SBM-1	Network Coverage	Evolution of network coverage and projections.
13	GOV-1 / GOV-2	Sustainability Governance	ESG structure comprising the Executive Committee and three committees: Sustainability, DEI and Energy.
14	GOV-1 / GOV-2	Sustainability Committee	Role, composition and objectives of the committee.
15	GOV-1 / GOV-2	Energy Management Committee	Mission and objectives of the Energy Management Committee.
16	GOV-1 / GOV-2	DEI Committee	Mission and objectives of the Diversity, Equity and Inclusion Committee.
17	SBM-2 / IRO-1	Sustainability Strategy	Materiality and double materiality.
18	SBM-2 / IRO-1	Materiality Assessment Process	Five-step process for defining material topics.
19	SBM-2 / IRO-1	Materiality	Materiality matrix and list of the 19 material topics.

Page	Code	Topic	Overview
20	GOV-3 / GOV-4 / GOV-5	Sustainability, Compliance and Risk Management Structures	Sustainability-linked incentives, due diligence in reporting, risk management and internal controls.
21	ESG & ODS	General Initiatives	Cross-cutting environmental and sustainability initiatives.
33	ESRS E4 / ESRS 2 IRO-1	Environmental Management	Biodiversity, reduced materiality, ambition and associated risks.
34	ESRS E4	Environmental Management	Overall environmental approach, circularity, resource reduction and clean energy.
35	ESRS E4 / E4-5 / E4-6	Environmental Protection Areas and dstelecom's Areas of Activity	Protected areas, operational footprint, species, biodiversity, and flora and fauna protection.
36	ESRS E4	Environmental Management Tools	Environmental Management System and ISO 14001 certification.
37	ESRS E1	Climate Transition Context	Overview of the climate transition and decarbonisation measures.
38	ESRS E5 / ESRS 2 IRO-1	Value Chain / Circular Economy	Circular economy, risks, ambition and circularity principles.
39	E5-1 / E5-2	Sustainable Supply Chain Management	Recycled/reclaimed materials, circularity, suppliers and supply chain governance.
40	E5-3 / E5-6	Circularity Objectives / Life Cycle Cost	Strategic circularity objectives and life cycle cost of core products.
41	ESRS E3 / ESRS 2 IRO-1	Water	Water management on campus, consumption, reuse, efficiency and risks.
42	ESRS E1 / ESRS 2 IRO-1	Greenhouse Gas Emissions / Climate Change	Emissions, energy efficiency, climate ambition, and physical and transition risks.
43	E1-1 / E1-2 / E1-3 / E1-4	Climate Commitment and Transition Strategies	Transition measures, self-consumption, green energy, fleet and decarbonisation roadmap.
44	ESRS E1	Renewable Energy	Solar energy and local clean energy production.
45	ESRS E1	Mobility	Sustainable mobility and transport solutions.

Page	Code	Topic	Overview
46	ESRS E1	BCSD Charter of Principles	Charter of principles and sustainability commitments.
47	ESRS E1	Environmental Indicators	Energy and environmental performance indicators.
48	ESRS E2-4 / ESRS E3-4	Waste / Water	Waste and water consumption tables with data from 2023 to 2025.
49	ESRS E5-5 / ESRS E5-4	Waste Generation / Resource Inflows	Waste generation, resource consumption and recycled materials.
50	ESRS E2 / ESRS 2 IRO-1	Pollution	Waste-related topics, recycling ambitions and pollution risks.
51	E2-1 / E2-2 / E2-3 / E2-6	Pollution Prevention	ISO 14001, pollution prevention, plastic reduction, financial guarantee and gas replacement.
54	Social	Opening of the Social Section	Introduction to the social section.
55	ESRS S1 / ESRS 2 IRO-1	Social Contract with Employees	Career development, remuneration, working conditions, community impact and benefits.
56	S1-1 / S1-15 / S1-8 / S1-10 / S1-11 / S1-2 / S1-3 / S1-4	Social Contract with Employees	Career development, remuneration, social activities and working conditions.
57	S1-13 e S1-1	Social Contract with Employees	Social activism, regular performance assessment and gender equality.
58	ESRS S1	Benefits	Employee benefits.
59	ESRS S1	Social Section Support	Transition page / visual support.
60	ESRS S1-9	Social Performance Indicators	Social indicators: employees, accidents, absenteeism, gender and leadership.
61	ESRS S1 / ESRS 2 IRO-1	People Management	Human rights, talent attraction and retention, ambition and risks.
62	S1-17	People Management	Human rights, salaries above the minimum wage and absence of incidents.
63	ESRS S3 / ESRS S4 / ESRS 2 IRO-1	Customer Experience	Customer protection and service, cyber threats, trust and regulatory compliance.

Page	Code	Topic	Overview
64	Social	Transition Page	Continuation of the social section.
65	ESRS S1 / ESRS 2 IRO-1	Diversity, Equity and Inclusion	DEI, ambition and associated risks.
66	S1-1 / S1-6	Diversity, Equity and Inclusion	DEI principles and diversity and inclusion metrics, including employees with disabilities.
67	ESRS S1	Health and Safety	Introduction to the health and safety topic.
68	ESRS S1	Health and Safety	Continuation of the health and safety topic.
69	ESRS S1	Training	Transition page for the training section.
70	ESRS S1 / ESRS 2 IRO-1	Training	Professional training, training hours, postgraduate programmes and associated risks.
71	ESRS S1	Partnerships with Educational Institutions	Partnerships with universities, vocational schools and CTeSP programmes.
72	ESRS S1	Training as a Solution	Continuous learning, annual training plan, and technical and behavioural development.
73	ESRS S1	Training Indicators	Training indicators and metrics.
76	ESRS G1	Ethics and Integrity	Privacy, accessibility, compliance, anti-corruption and cybersecurity.
77	G1-1 / G1-3 / G1-4	Privacy and Personal Data Processing	Privacy policy, confidentiality and responsible data processing.
78	G1-1 / G1-3 / G1-4	Cybersecurity	Cybersecurity roadmap, SIEM, unauthorised access testing and phishing simulations.
79	ESRS G1	Reporting Irregularities	Whistleblowing channel.
80	G1-1 / G1-3	Reporting Irregularities	Whistleblowing channel, whistleblower protection, anonymity and absence of complaints received
81	ESRS G1-3 / G1-4 / G1-5 / G1-6	Anti-Corruption Policies	Corruption and related offences risk prevention plan, training, auditing and compliance indicators
82	ESRS G1	Innovation	Introduction to the innovation topic.
84	ESRS G1	R&D Projects / Public Relations	R&D projects, innovation culture, satisfaction, reputation and external communication.
86	ESRS G1	GRESB Score	GRESB result / score.
87	ESRS G1	Message from the ESG Manager	Closing message of the governance section.