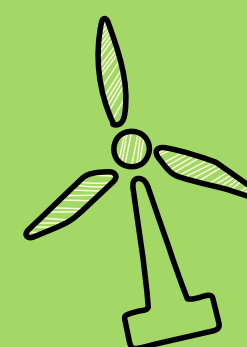
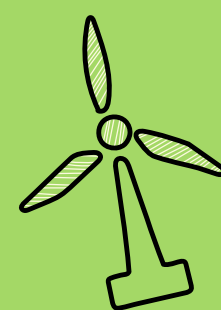
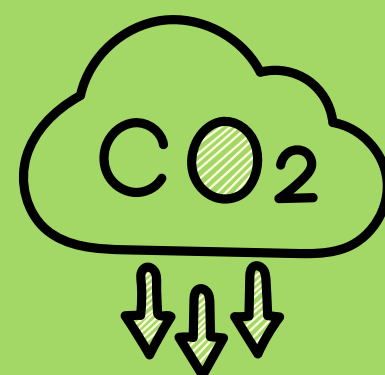
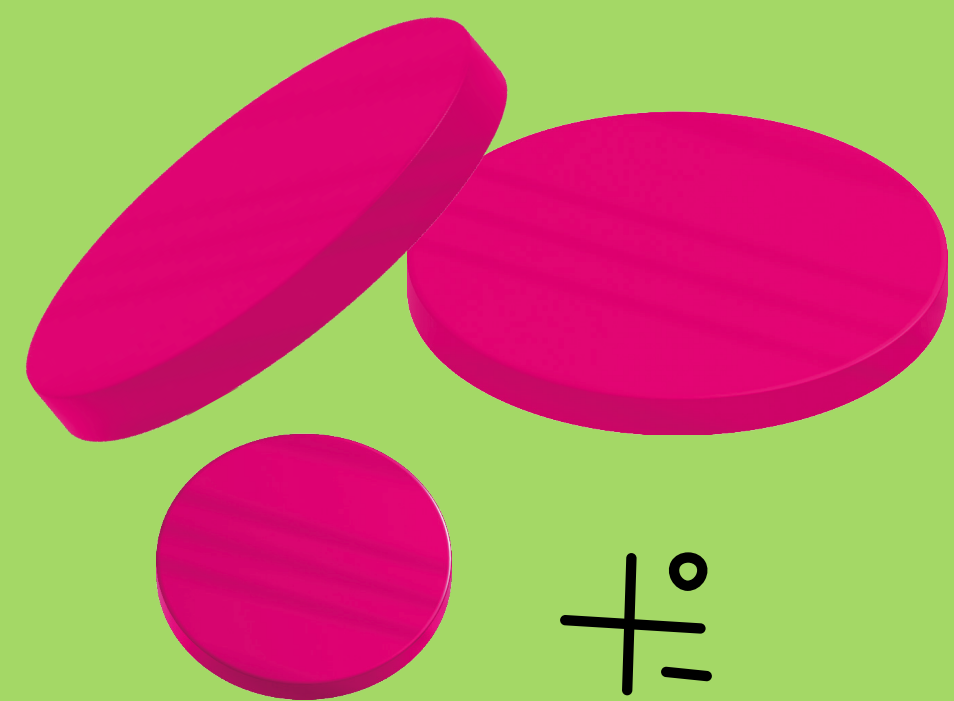
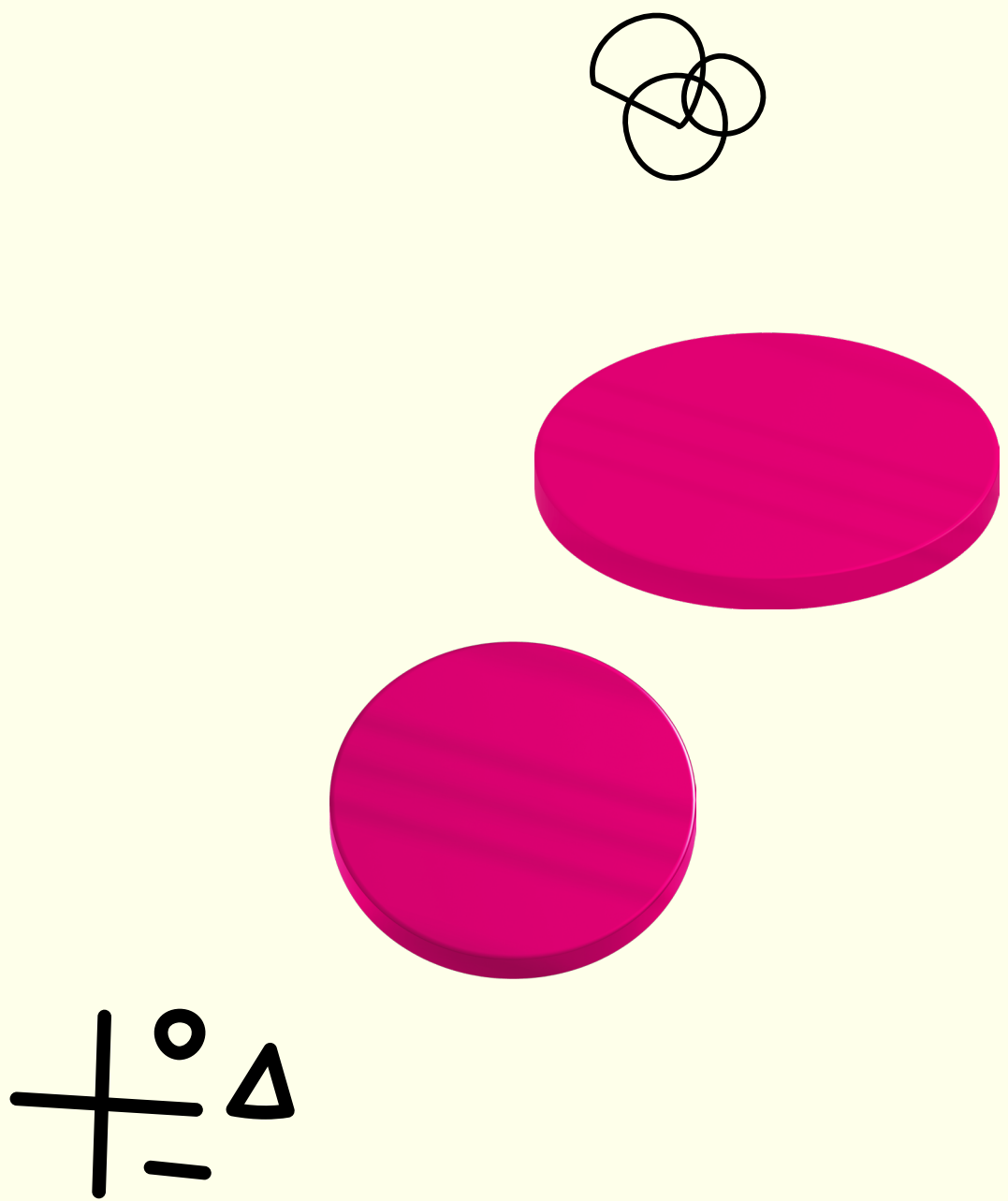


*CORPORATE
RESPONSIBILITY
REPORT
2024*





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*SUSTAINABLE AND
RESPONSIBLE BUSINESS
CONDUCT*

MESSAGE FROM THE CEO

At Hrvatski Telekom, sustainability means more than just a buzzword. It is the fundamental way we have learned to think and make decisions every day, whether in our business operations, our relationships with customers, colleagues, partners, or the community. For the past two decades, we have reported our results with complete transparency. This year, for the first time, our sustainability efforts are part of our Annual Report, as required by the new European Sustainability Reporting Standards (ESRS).

For us, this means yet another opportunity to be more open and act even more responsibly and decisively. Our goal is simple: we want everyone who uses our services or collaborates with us, as well as every single one of our over five thousand employees, to fully understand what we are doing for people, the environment, and society. Although sustainability is often measured in numbers, it is about making sustainable choices, what we consciously decide to do every single day, be it bold strides or small steps that collectively make all the difference. Big changes or small, what matters is that we keep moving forward systematically and deliver tangible results.

In 2024, we have remained focused on what we believe matters most: our customers, partners, shareholders, and employees. We aim to continue delivering the best customer experience on the market and to be a company where people genuinely want to work and are given every opportunity to develop professionally. This focus also defines our approach to sustainability because we believe that responsible business starts with the way we treat people. That is why we are especially proud to have been recognised once again this past year as a leader in corporate governance and business integrity, securing the Croatian Sustainability Index for the fourth consecutive year and, once again, being the only Croatian company listed among the World's Most Ethical Companies by Ethisphere. While awards and accolades are never the aim, whether they come from domestic or international authorities, they confirm that the tremendous effort behind all we do is being recognised and seen as an example of best practice.

At the same time, they remind us that everything we do carries weight and brings with it specific responsibilities. We treat them as motivation to do even better as we move forward. That is why, last year, we continued to invest more than anyone else on the market. Across the entire HT Group, we invested almost €243 million. We also achieved a record year in fibre optic network construction, increasing coverage to over 150,000 new households. Independent analyses have once again confirmed that we have the best mobile network in the country. We do all this to ensure that digital opportunities are within reach for everyone, no matter where they live or do business.

It is just as important to us that the network we are building is not only fast and reliable, but also energy-efficient, with the smallest possible environmental footprint.

Since 2021, all the electricity we use has come from renewable sources. And at the end of 2024, we took things a step further by starting to produce some of our green energy, through Croatia's very first virtual power purchase agreement. By switching off our 3G network, we have made room for even better and more energy-efficient 4G and 5G services. The innovative technologies provide our customers with a top-notch experience while also reducing our carbon footprint.

We are firm believers that real change does not happen overnight and that we make the most significant strides when everyone pulls together. We recycle all our business waste and encourage our customers to dispose of and recycle their old devices responsibly via our "A Call You Have to Take" platform. Last year alone, we collected over 39,000 old electronic devices, and the initiative was named the best European sustainability campaign.

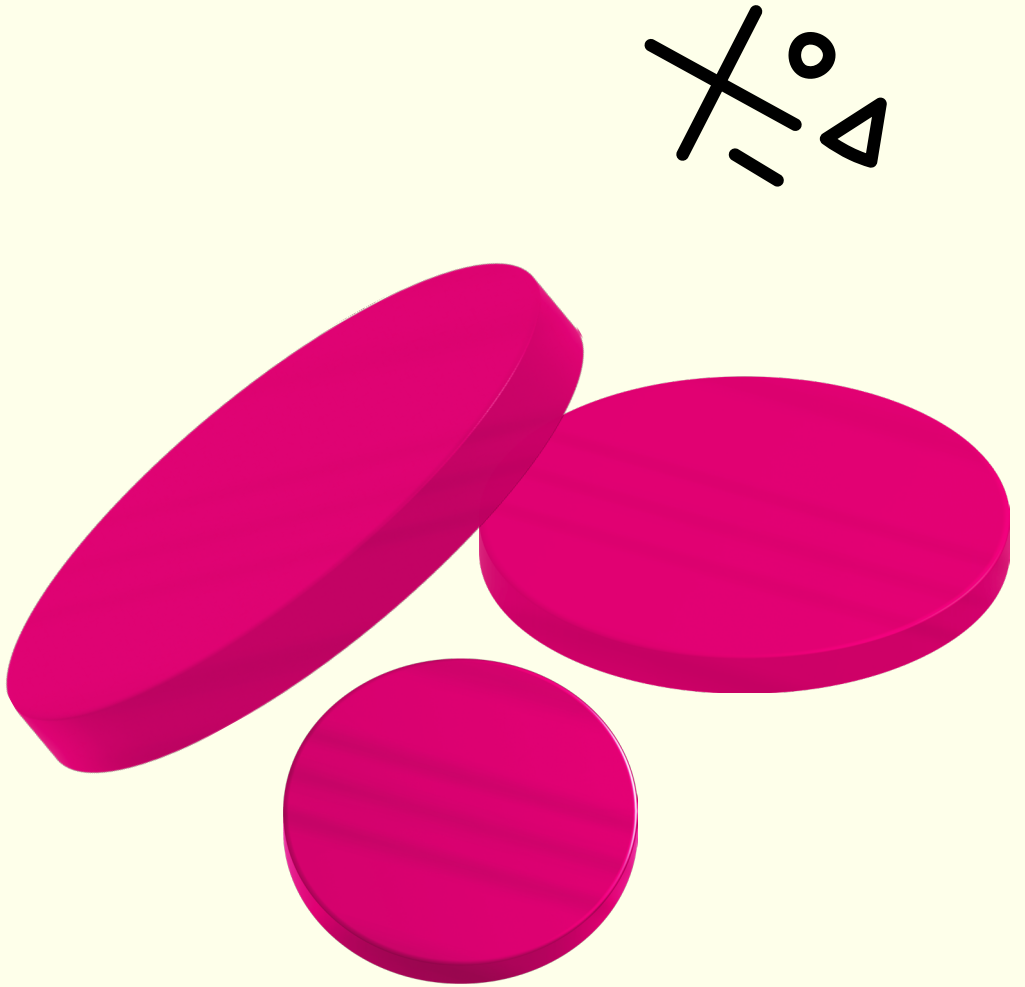
Quite simply, without our customers, we would not be here. That is why we recognise that part of our responsibility is to help ensure everyone can feel safe, informed, and prepared to navigate whatever the digital world may bring and to act responsibly. This is especially true for children and young people, the so-called digital natives. Through our educational programme, "Tools for Modern Times", we have reached more than 150 primary schools across 20 counties, with a clear aim: to equip every child with the knowledge and skills needed to behave more safely and responsibly online, while helping parents and teachers better understand the challenges of growing up in today's world.

While our customers are the reason we exist, our employees are the beating heart of this company. They are the driving force behind everything we do. They are the ones who build networks, develop services, solve customers' challenges, and achieve the results of which we are proud. Their dedication lies beneath every triumph we achieve. That is why we are proud that, at the beginning of last year, a new three-year collective agreement came into effect, the only one among telecoms in Croatia. We were also honoured to receive the Employer Partner recognition for the tenth year running, the Above and Beyond award for the third time, and once again, the Equal Pay Champion certificate.

Thank you all for being a part of our journey. We will continue to act responsibly and with dedication, always striving to do even better for our customers, our employees, our partners, and society.

Nataša Rapaić

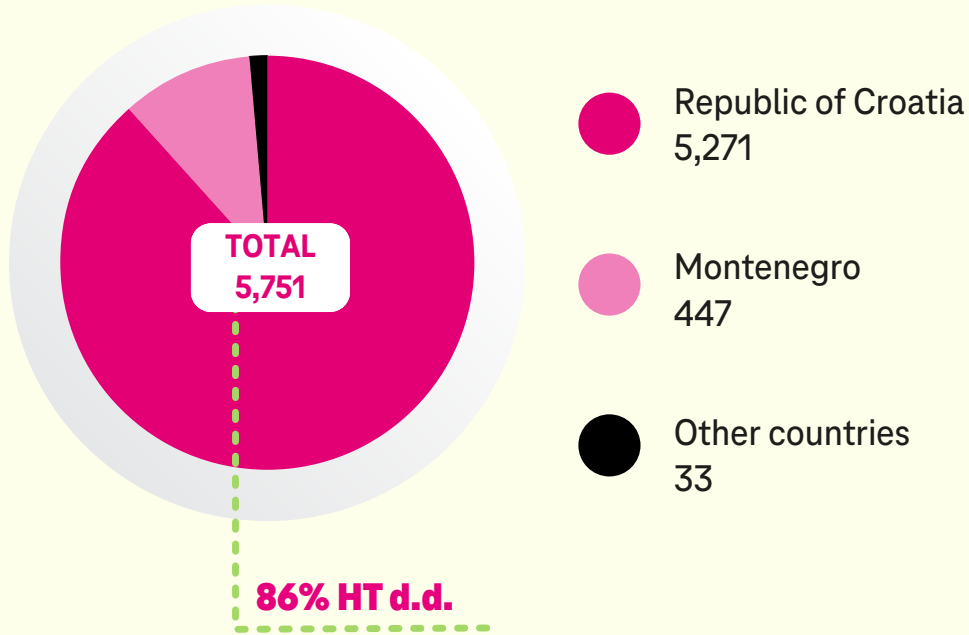
President of the Management Board, Hrvatski Telekom



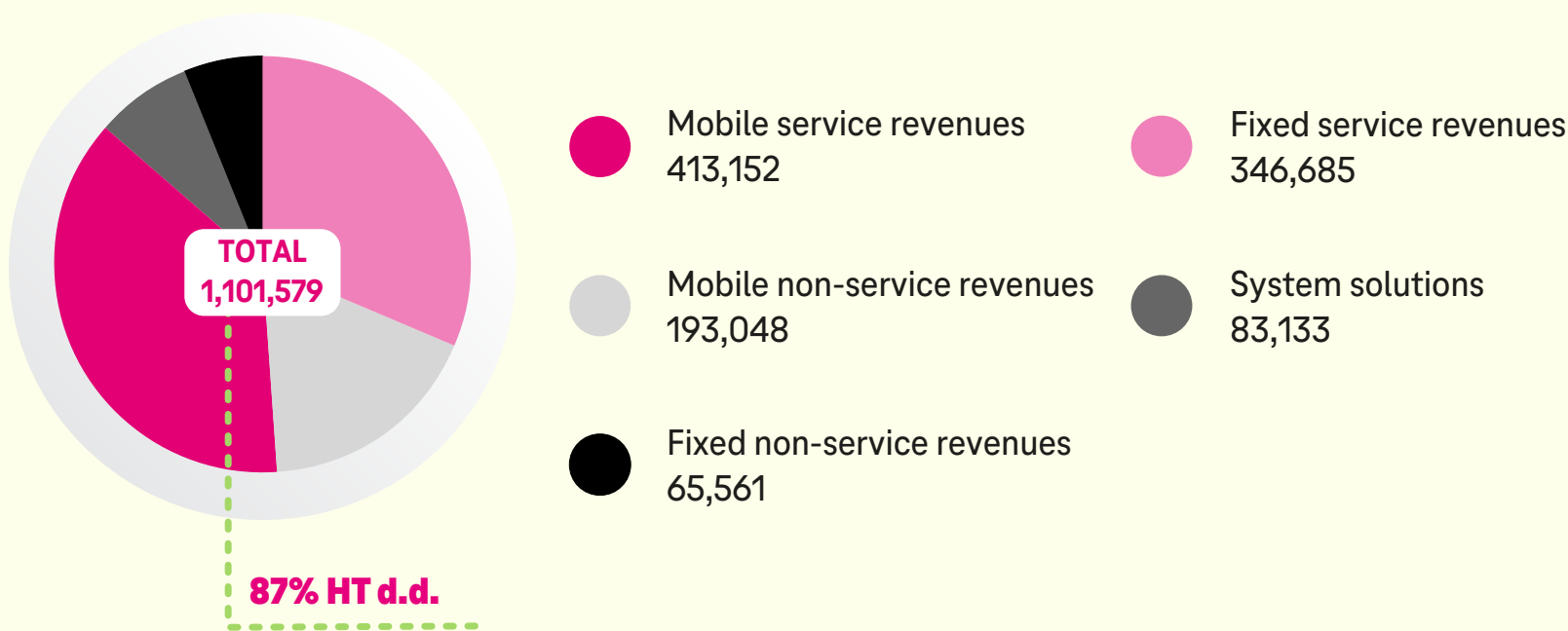
ABOUT US

The HT Group is the leading telecommunications services provider in the Republic of Croatia, offering fixed and mobile telephony, wholesale, and internet and data services. In Montenegro, the Group provides a full range of fixed and mobile telecommunications services (voice services, internet, TV, integrated services, leased lines, data networks, and ICT and cloud solutions). In 2024, the HT Group employed more than 5,700 people and generated revenues exceeding EUR 1.1 billion.

Number of HT Group employees by geographical area



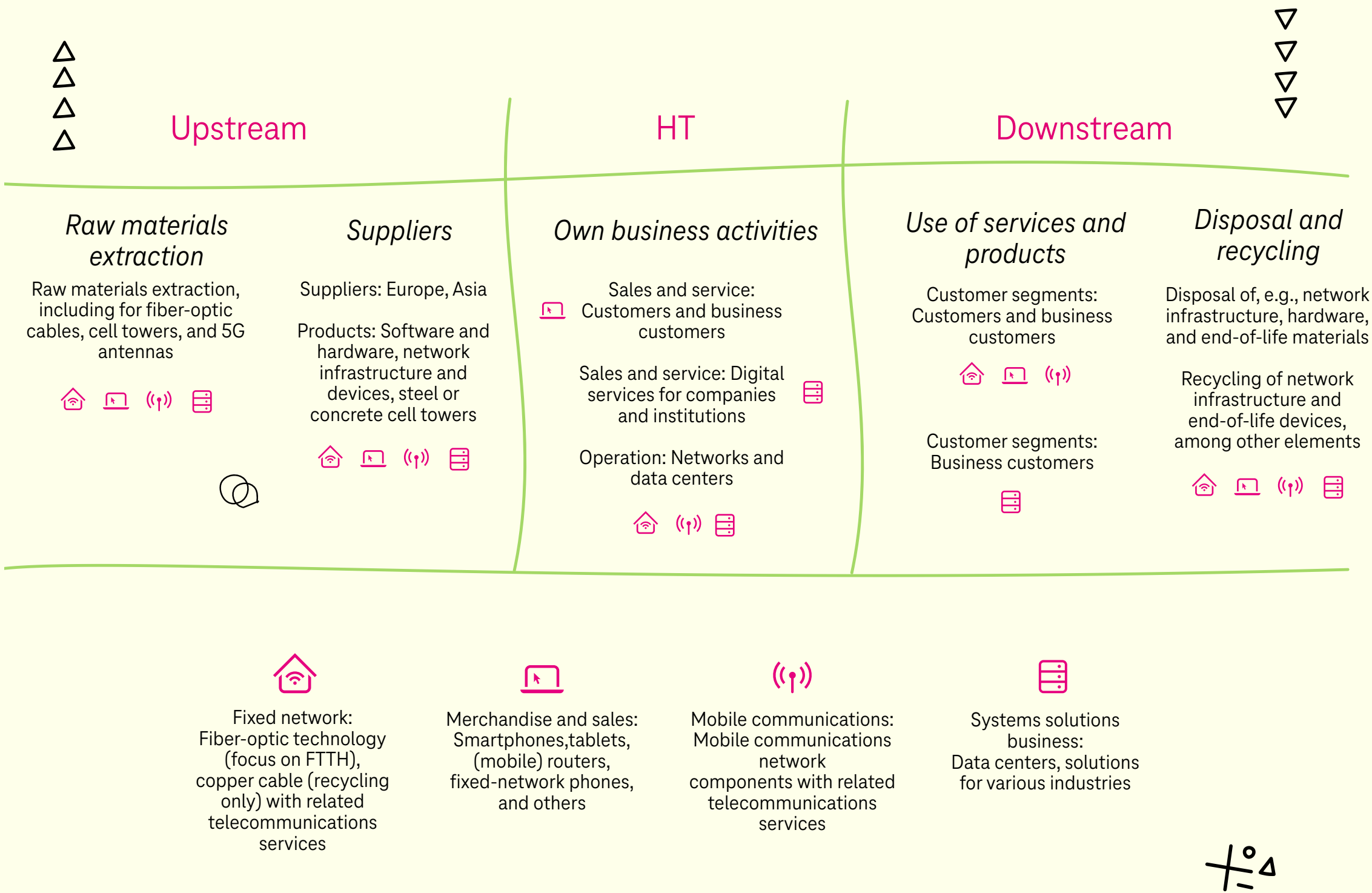
Total consolidated revenues of the HT Group per business segments in thousands of euros



More information on HT's business results and corporate profile is available in the [HT Group's Annual Report for 2024](#).

HT Group's value chain

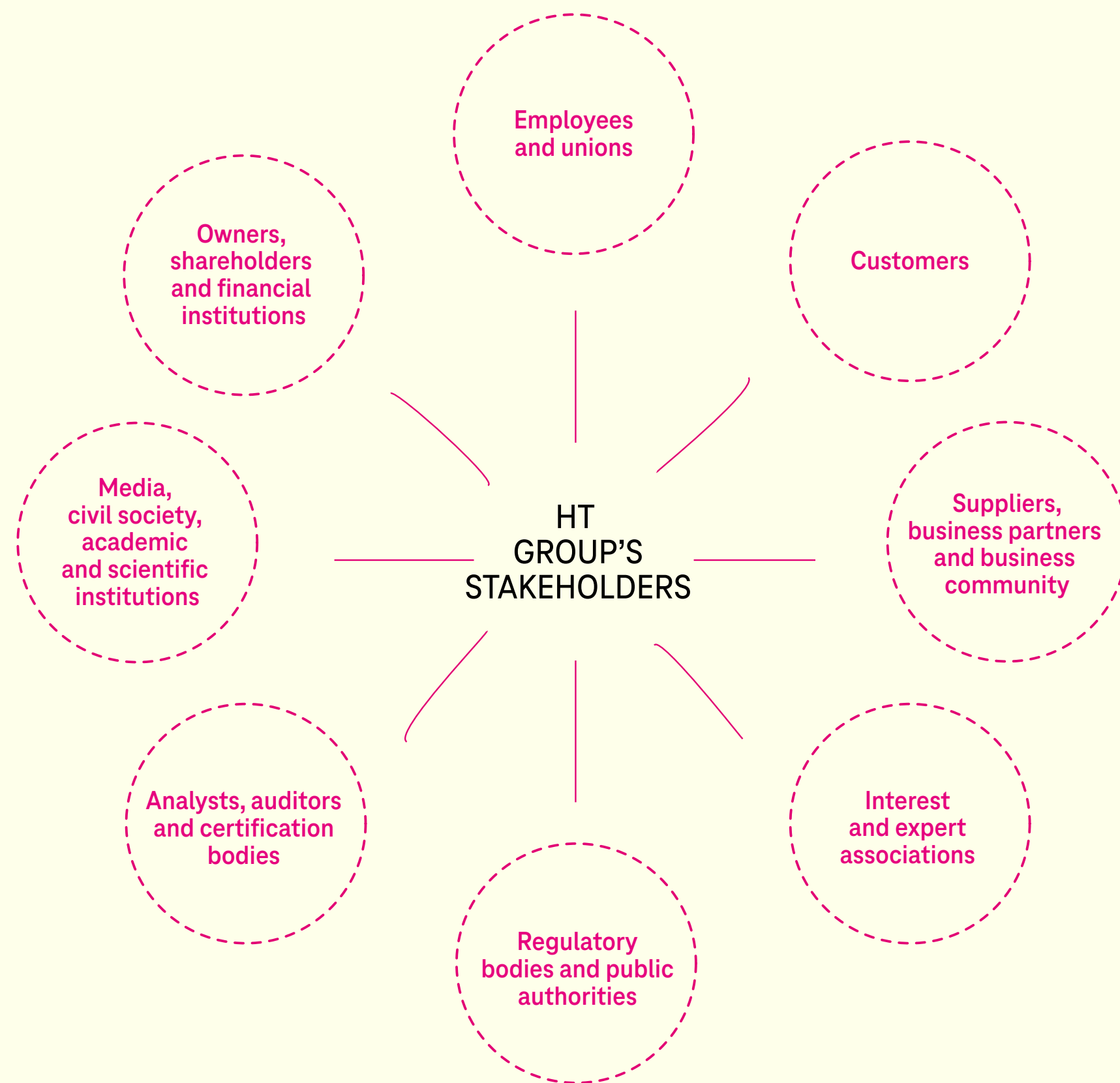
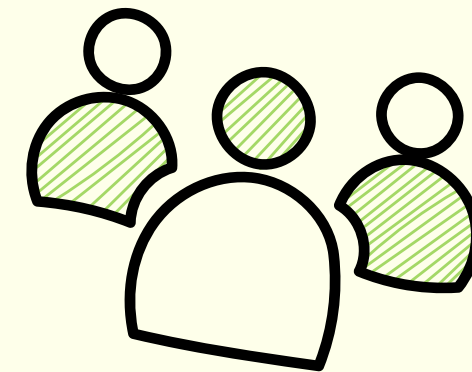
The HT Group is part of global value chains, and cooperation with domestic and international suppliers includes the procurement of telecommunications and infrastructure equipment and services, IT services, ICT integration services, delivery, implementation and maintenance of service platforms, mobile devices, media content, postal services, energy sources, electricity and facility maintenance services. Croatian suppliers account for 81% of the total suppliers and 53% of the total turnover.



ABOUT US

HT Group's stakeholders

To have an in-depth understanding of the business ecosystem across the value chain, we have identified more than 200 individual stakeholders or stakeholder sub-groups that are important for the sustainability of HT's business.



Membership in associations

The HT Group is active in various organisations that promote sustainable development at the national and international levels.

HT

- UN Global Compact (UNGC) initiative, which connects the business sector with UN agencies, governments and civil society in supporting fundamental social values in the fields of human rights, worker rights, environmental protection and the fight against corruption,
- Croatian Business Council for Sustainable Development (HR PSOR), a non-profit association which fosters sustainable development in the economy and advocates for business interests in sustainability matters; HT is represented in its Administrative Council,
- Croatian Employers' Association (HUP), a voluntary, non-profit and independent association. Within HUP, HT is represented in its Executive Board and in the work of its sectoral associations, such as the Association for Information Technology and Communication Activities,
- Croatian Artificial Intelligence Association (CroAI),
- Croatian Chamber of Economy (HGK), the Environmental Protection Community
- Foreign Investors Council (FIC), American Chamber of Commerce (AmCham) in Croatia and German-Croatian Chamber of Industry and Commerce (DKIHK),
- At the international level, HT is a member of electronic communications network operators' organisations – Connect Europe and GSMA – which advocate for the interests of the electronic communications operators' sector at the EU level, and ETIS – The Community for Telecom Professionals – a non-profit organisation bringing together major telecom service providers, where HT is represented in the ETIS Council.

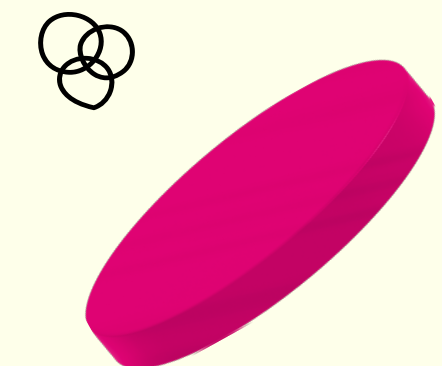


Combis

- Croatian Association of New Technology Distributors (HUDNT),
- Croatian Institute for Cyber Security (HIKS),
- Croatian Employers' Association (HUP).

CT

- Chamber of Economy of Montenegro,
- American Chamber of Commerce in Montenegro,
- Montenegrin Employers' Federation,
- Montenegrin Foreign Investors' Council,
- German Business Club.



RESPONSIBLE CORPORATE GOVERNANCE

Sustainability and responsibility are integral to HT's approach to corporate governance. The backbone of good corporate governance of the HT Group is implementing the highest business standards and exemplary corporate governance practices. Integrity, ethical conduct, compliance with the principles of data protection and safety, fostering an integral corporate compliance system and risk management, accepting key premises of digital responsibility, respect of human rights, creating sustainable procurement chains and transparent communication on activities concerning the environment and social corporate responsibility serve as the basic guidelines in HT's everyday business.

Ethical business conduct

The HT Group has zero tolerance towards any form of bribery and corruption in its business activities, whereby it confirms its commitment to ethical business practices. According to legislation, values and integrity of the HT Group, the desirable business conduct has been set out by the **Code of Conduct**, which was updated in 2024 as part of a regular procedure. The purpose of the Code of Conduct is to give clear guidance to employees, managers and related parties of the HT Group about lawful behaviour and acting with integrity in all business situations. It also provides business partners and suppliers with a clear and transparent overview of the HT Group's ethical, social and environmental commitments.

In 2024, the following documents were adopted at the HT Group level: the **Group Benefits Policy**, which regulates the giving and receiving usual and allowed benefits such as gifts, entertainment and presents at events between the HT Group employees and its business partners, the **Code of Human Rights**, aimed at promoting respect and human rights and care for the environment, and the **Diversity, Equity and Inclusion (DE&I) Policy**, which raises awareness of the importance of diversity in the business and social environment as a fundamental value of the modern society.

More information on HT's practices to ensure ethical business conduct is available under the "ESRS G1 – Business conduct" chapter of the **HT Group's Annual Report for 2024**. The above-mentioned policies are available at **HT's web page**.

HT implements various activities to raise employee awareness about the importance of anti-corruption, integrity and ethical conduct. Concerning the Group Benefits Policy, a self-assessment form was introduced in 2024 to guide employees in determining the (in) admissibility of actions related to giving and receiving benefits. Efforts to emphasize the importance of compliance-related training are continuously ongoing, and the International Anti-Corruption Day was traditionally marked. In 2024, it was done in collaboration with colleagues from CT, who participated in a themed quiz on compliance, anti-corruption and ethical behaviour.

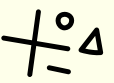
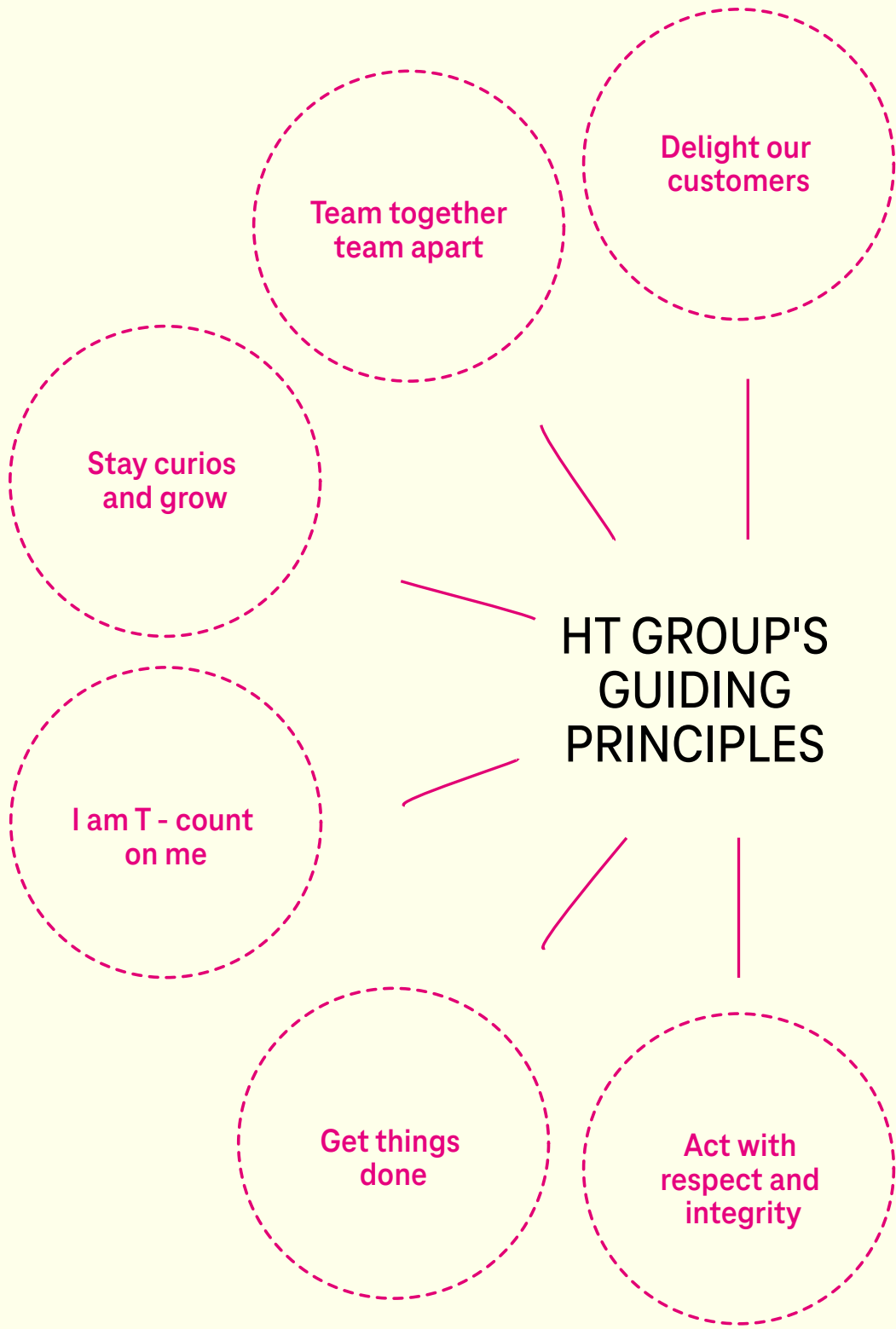
HT's experts actively participate in expert meetings and conferences on compliance and the fight against corruption. As in previous years, in 2024, HT actively participated in the yearly Investigation & Prevention Workshop, exchanging experiences and best practices concerning internal investigations across the DT Group. The Compliance Officer actively participated in expert conferences and panels on compliance and the fight against corruption.

In 2024, HT was declared one of the most ethical companies globally, according to the Ethisphere Institute, the global leader in defining and promoting standards of ethical business practices. This recognition is awarded for implementing the highest standards of ethical conduct, compliance and corporate governance in all business areas. HT is the only Croatian company ever to have received this recognition, and is one of three telecom companies globally to be included on the list. Also, HT received recognition by the Croatian Financial Services Supervisory Agency (HANFA) for applying the highest standards and achieving the most significant improvement in compliance with HANFA's Corporate Governance Code.



Strong corporate culture

The highest ethical standards have been built into HT's corporate culture. A strong corporate culture is also a business opportunity to increase the attractiveness of HT as an employer on a highly competitive labour market. Therefore, boosting HT's position as the most attractive employer on the market is one of HT's strategic priorities. The values incorporated in the six Guiding Principles of HT determine HT's approach to corporate responsibility and culture. All managers and employees should follow the Guiding Principles in their everyday work. HT's Guiding Principles are also included in evaluating HT's work efficiency as a responsible and sustainable company, and in assessing the performance of its employees.

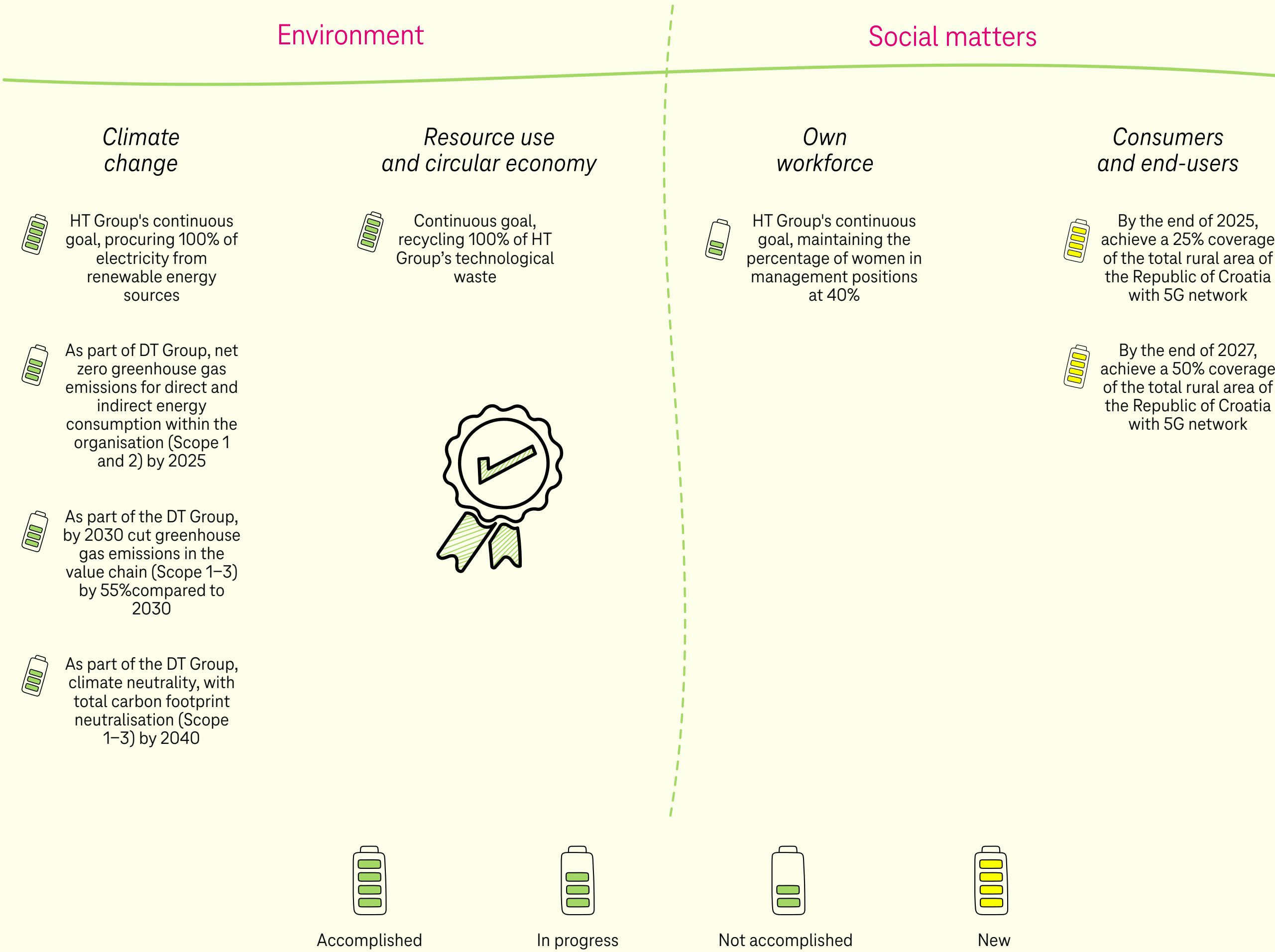
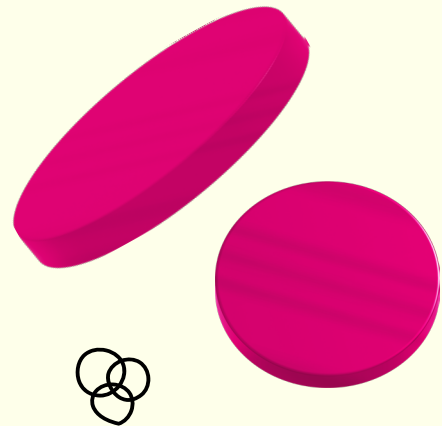


RESPONSIBLE CORPORATE GOVERNANCE

Sustainability strategy

HT’s Sustainability Strategy reflects the ambition of the entire HT Group to be a digital and sustainable telecommunications company, aimed at creating value for all its stakeholders – customers, employees, shareholders, partners, and society as a whole. Long-term sustainability is an integral part of HT’s business strategy, aimed at achieving sustainable and profitable growth by connecting everyone to the opportunities enabled by digitalisation. The HT Group’s sustainability approach is built around three key areas: climate change, resource efficiency and digital inclusion. We focus on efficiently using resources, reducing greenhouse gas emissions and creating a better future for all.

More information on HT’s strategy and sustainability goals is available under the “ESRS 2 – General disclosures” chapter of the [HT Group’s Annual Report for 2024](#).



RESPONSIBLE CORPORATE GOVERNANCE

Climate change

The consequences of climate change and the potentially increasingly unpredictable and devastating impacts of weather disasters connected with non-sustainable use and consumption of non-renewable energy sources have already been witnessed, posing a grave danger to ecosystems and humanity. They threaten to inflict physical infrastructure damage and harm the economy. Digitalisation has the potential to accelerate the necessary transition towards a low-carbon economy and change the course of events towards a more sustainable future. Having recognised the severity and urgency of the situation, HT's dedication to climate change mitigation is included in HT's corporate strategy. HT has set science-based goals for its GHG emission reduction, which all DT Group members have also adopted. The DT Group's climate goals reflect the direction of the European Green Deal and were approved by the Science Based Targets Initiative (SBTi), which confirms their alignment with the Paris Agreement goals.

Resource efficiency

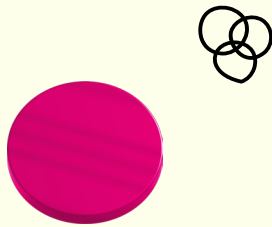
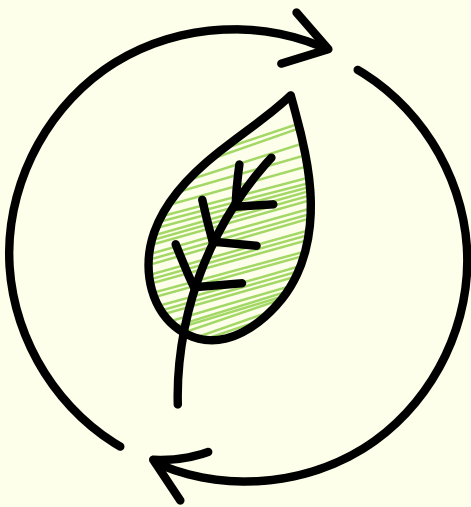
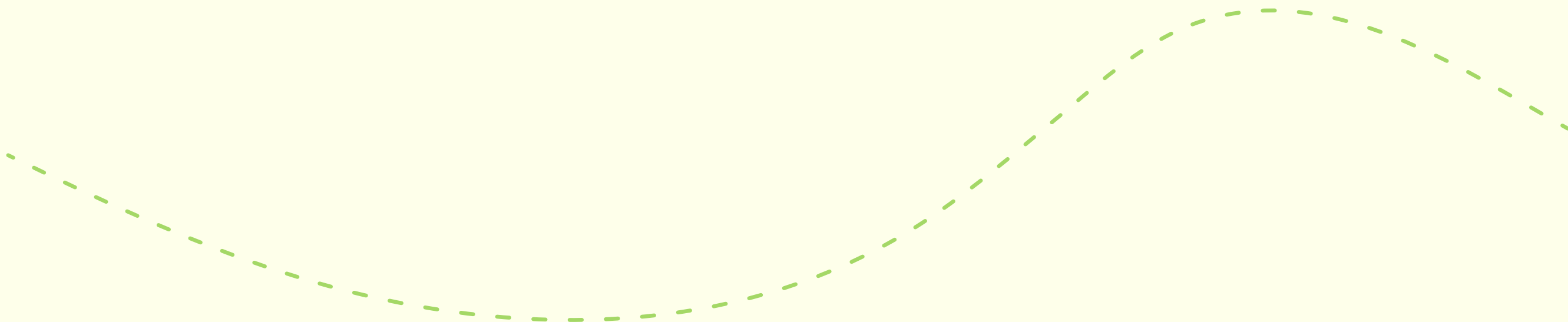
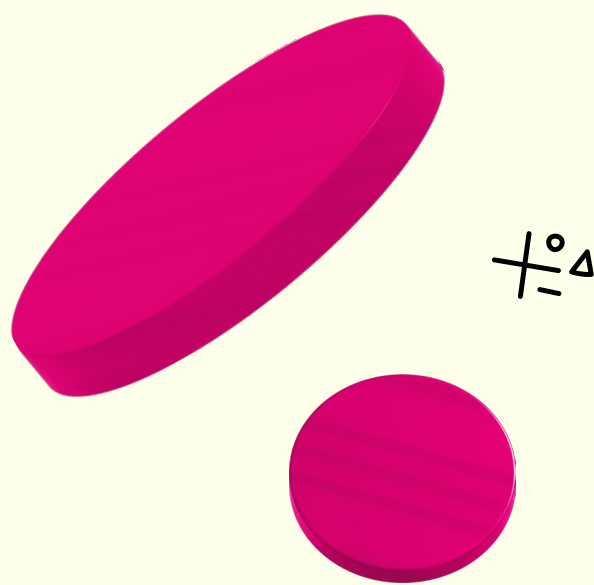
The linear economy model based on the singular use of materials has led to unsustainable levels of consumption of natural resources that, in addition to threatening the stability of ecosystems, create an increasing challenge for companies regarding the availability of raw materials. In response to this challenge, business models based on the circular economy principles, enabling a more sustainable approach to business, are increasingly being applied.

At the HT Group, we take a holistic approach to the responsible use of resources and implementing circular principles. Through strategic, proactive and preventive action, we strive to reduce waste generation by maintaining, repairing, and renovating equipment while reusing materials that can be used as valuable resources. In doing so, the HT Group recycles waste and materials in an environmentally responsible manner, mainly concerning waste generated during the construction, replacement and modernisation of network infrastructure.

The HT Group's ambition is to achieve full circularity of technology and devices across the entire value chain, enabling the reuse of materials. To this end, HT applies different approaches, introduces new offers and develops cooperation with various stakeholders, including HT's suppliers and customers to find joint opportunities and enable circular business models.

Inclusion, with a focus on digital inclusion

The social component of HT's Sustainability Strategy is focused on relationships among employees, relations with customers, suppliers and the community. HT strives to positively impact society, connecting everybody in Croatia with digitalisation opportunities, promoting equity, inclusion and diversity in building a better future. Digital inclusion reflects HT's belief in the power of digital technology to improve everyone's lives and be a catalyst for positive change. By fostering digital inclusion, HT wishes to empower individuals and groups and, by removing digital barriers such as the unavailability of technology, knowledge and skills, reduce the digital divide and create a more equal, connected and safer digital world for all.



RESPONSIBLE CORPORATE GOVERNANCE

Sustainability management
HT'S MANAGEMENT BOARD

NATAŠA RAPAČIĆ
President of the Management Board and
Chief Executive Officer (CEO)

MARIJANA BAČIĆ
Member of the Management Board and Chief
Operating Officer Business (COO Business)

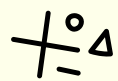
IVAN BARTULOVIĆ
Member of the Management Board and Chief
Operating Officer for Human Resources and
Customer Operations (COO)

BORIS DRILO
Member of the Management Board and
Chief Technical and Information Officer (CTIO)

SINIŠA ĐURANOVIĆ
Member of the Management Board
and Chief Corporate Affairs Officer (CCO)

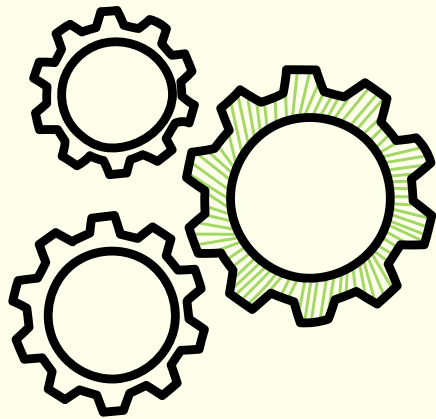
MATIJA KOVAČEVIĆ
Member of the Management Board
and Chief Financial Officer (CFO)

KREŠIMIR MADUNOVIĆ
Member of the Management Board
and Chief Operating Officer Residential
(COO Residential)



Areas of responsibility of the Members of HT's Management Board

ESG					
CEO					
Environment (E)			Society (S)		Governance (G)
Electricity	GHG emissions	Resource efficiency	Working environment	Digital inclusion	Corporate governance
CTIO	CFO	COO Residential / COO Business	COO	COO Residential / COO Business	CCO



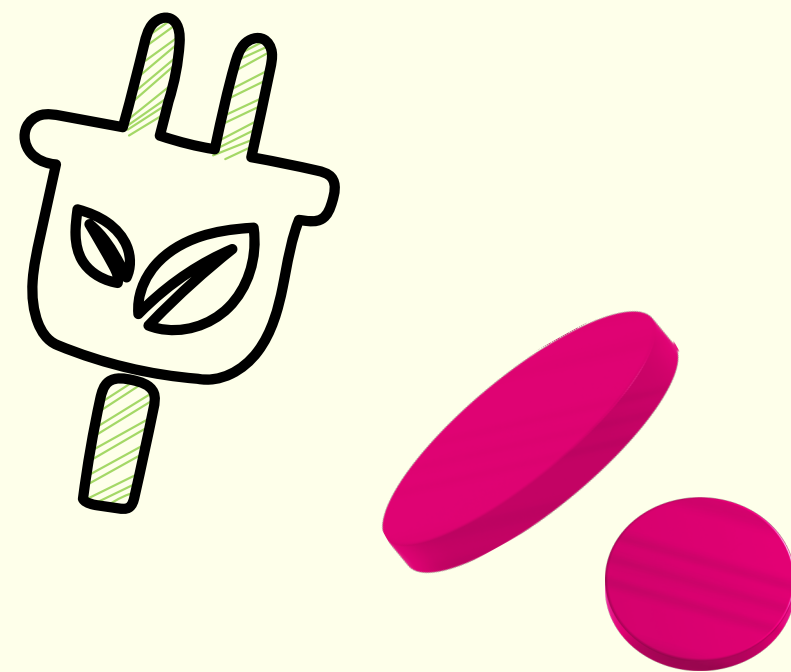
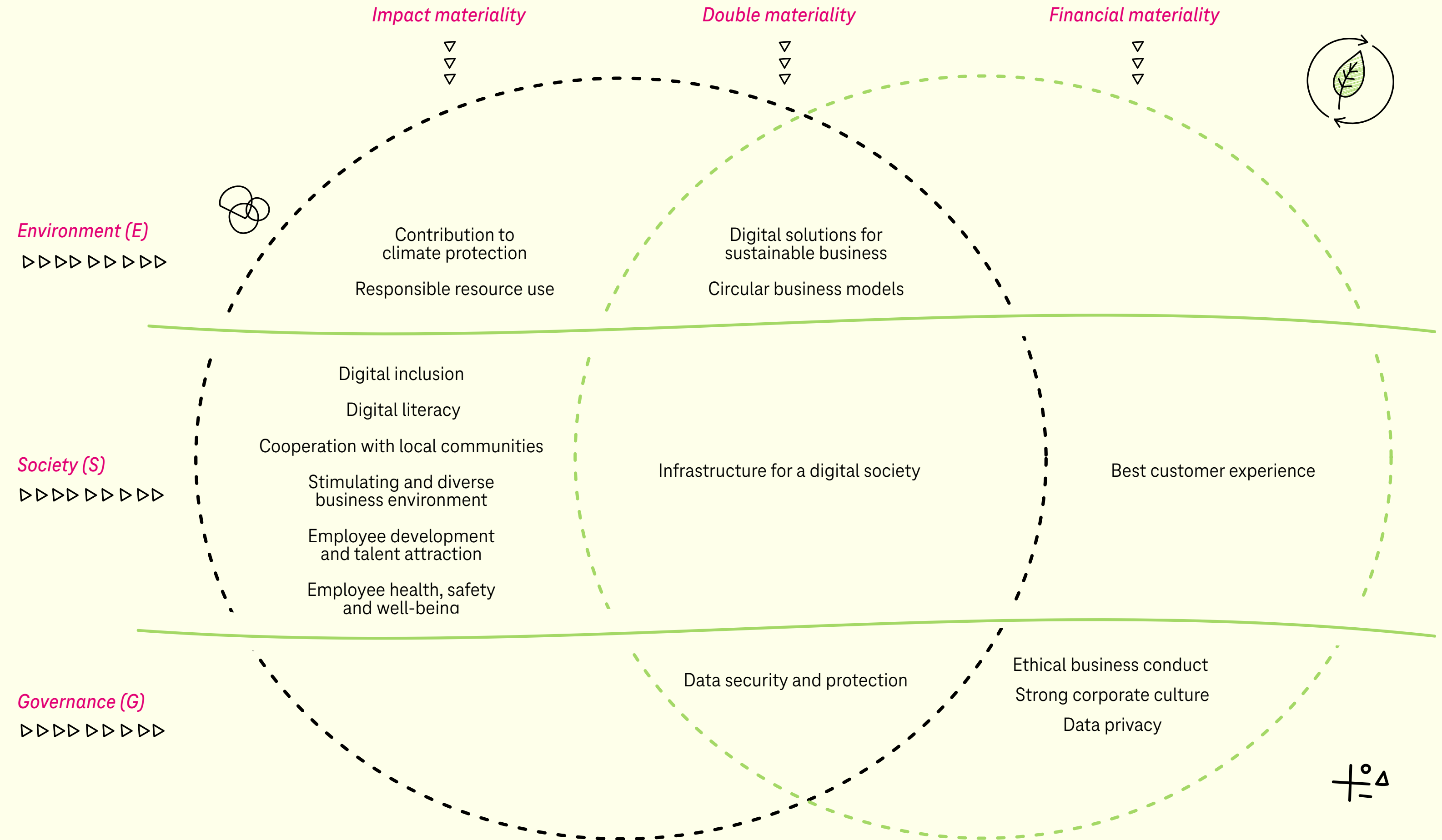
More information on HT's management of sustainability matters is available under the "ESRS 2 – General disclosures" chapter of the [HT Group's Annual Report for 2024](#).

RESPONSIBLE CORPORATE GOVERNANCE

Material topics in 2024

A double materiality assessment was conducted to determine HT's material impacts, risks and opportunities. On the one hand, the double materiality assessment aimed to identify any actual and potential impacts on society and the environment which are caused by the HT Group's business activities and relationships along the entire value chain. On the other, gaining an integral overview of the financial risks and opportunities for the HT Group that arise from managing our sustainability matters was also important.

More information on material impacts, risks and opportunities related to sustainability matters and their interaction with HT's strategy and business model is available in the „Sustainability Report“ included in the **HT Group's Annual Report for 2024**.



CONTRIBUTION TO THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

Through the 2030 Agenda for Sustainable Development (Agenda 2023), United Nations Member States have defined 17 universally and locally applicable Sustainable Development Goals (SDGs), reflecting priority areas of environmentally sustainable, carbon-neutral, resource-efficient, socially inclusive and equitable global development. The digital revolution has been recognised as one of six key transformations necessary to address the multiple crises related to climate change, excessive resource consumption and use, biodiversity loss and growing inequalities within and among countries.

As the leading telecommunications services provider, HT sees its opportunity to contribute to UN's SDGs in building high-quality reliable infrastructure, expanding high-quality and affordable broadband internet access and implementing activities aimed at creating digital opportunities, inclusion and safe environment for all. HT has identified its greatest impact in creating better economic, social and environmental conditions until 2023. HT will do so through the continued development of its network infrastructure and by fostering collaboration, innovation and business opportunities linked to digitalisation.



1. Business strategy



We provide excellent working conditions, support economic development through digitalisation and continuously work to make our value chain more sustainable.



We invest in building stable, secure and efficient network infrastructure, thereby laying the foundation for economic growth, knowledge sharing and development of a digital society.



Our innovative solutions and established network infrastructure help drive the transformation of cities into smart and liveable urban spaces.



We increase the share of innovative and sustainable products in our portfolio. In addition, we reduce the amount of waste we generate and recycle all generated waste.



We contribute to climate protection – within our organisation, by implementing measures to increase energy efficiency and by using renewable energy sources – and outside the organisation, by offering sustainable products and services.

2. Corporate responsibility



Our networks enable conditions for economic and social participation, thereby facilitating access to education, the lack of which is one of the main drivers of poverty.



We promote the health and well-being of our employees.



Through various programmes, we support the development of digital literacy across all age groups. We offer employees individual professional training and development programmes.



We promote equal opportunities and implement targeted measures to increase the proportion of women in leadership positions at HT and in STEM professions.



We increase the share of green energy in our total energy consumption and we use energy-efficient technology.



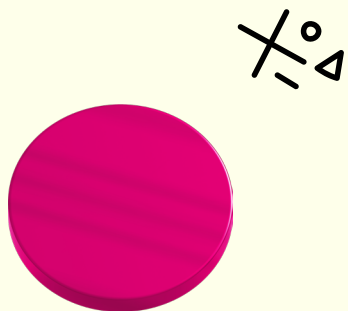
We promote diversity and support employees, regardless of gender, age, sexual orientation, disability, ethnic origin, religious beliefs or cultural background. We actively work to improve the living standards within our organisation, at our suppliers and in society at large.



We conduct business ethically and lawfully. We strengthen our internal information security, while our products and solutions ensure data protection and safeguard user privacy.

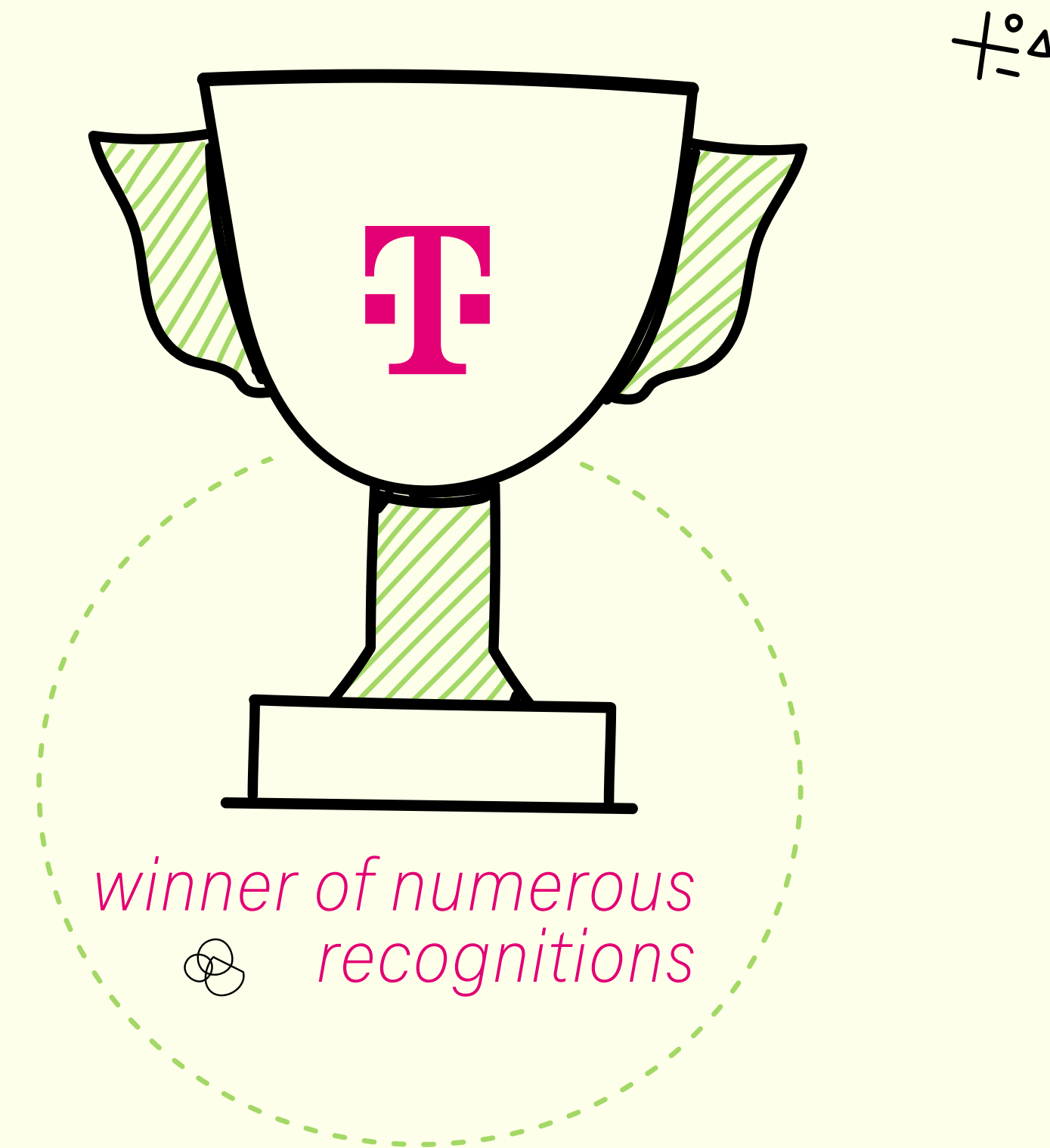
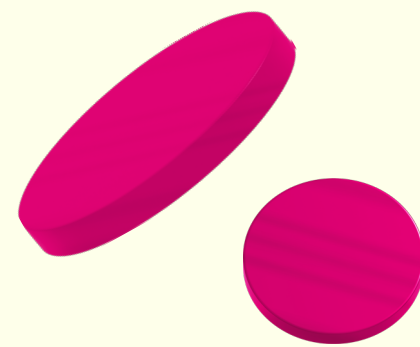


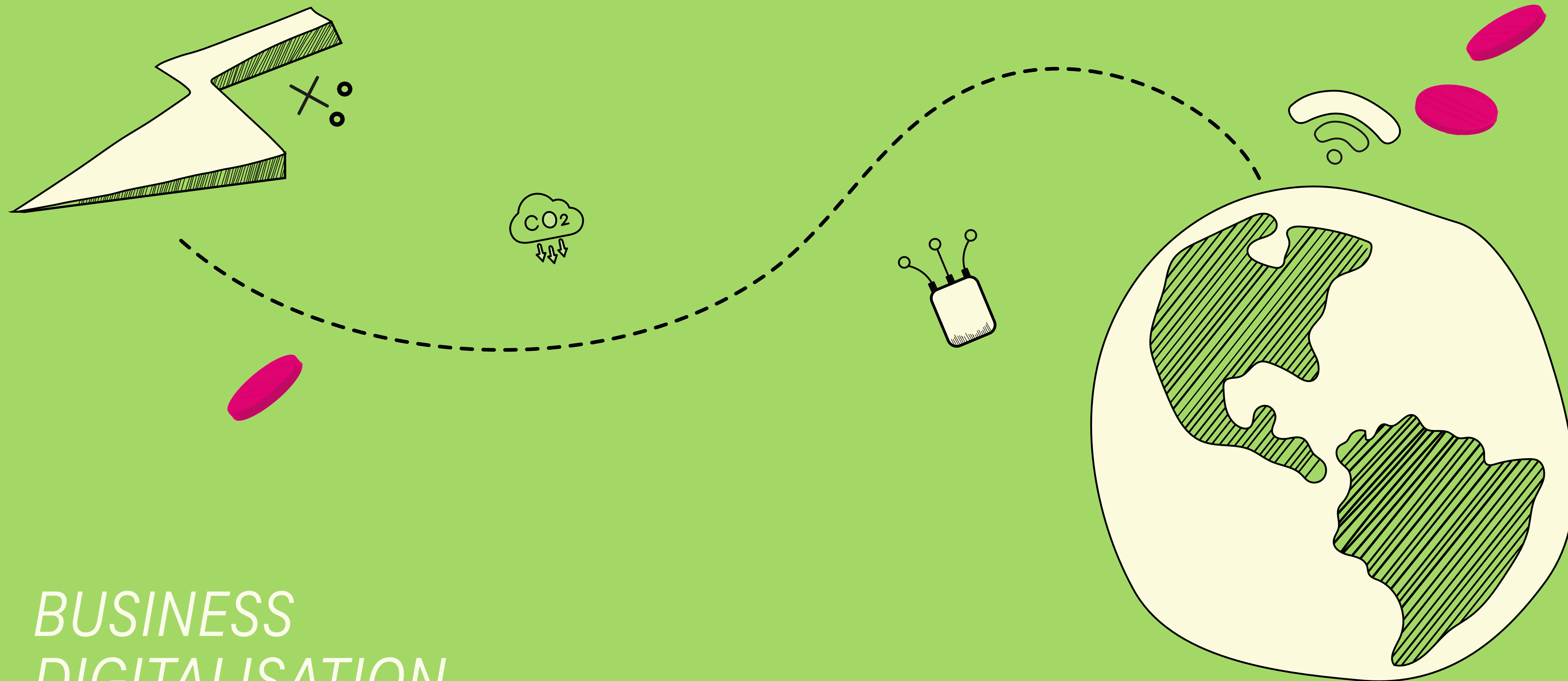
We collaborate with associations, institutions and companies at both national and international level.



INITIATIVES, AWARDS AND RECOGNITIONS

1. Best customer experience
- for both B2C and B2B,
2. #1 telecom brand on the market,
3. #1 mobile network – according to HAKOM, Ookla, umlaut and customers,
4. Leading fibre (FTTH) network – largest annual expansion, with more than 150,000 new customer units,
5. Leader across the entire Deutsche Telekom Europe:
- Cloudification: more than 90% of network functions,
- 57 business customers of the Security Operations Centre,
- Leading position in the chat communication share.
6. HT share value – the highest since 2010,
7. HANFA's recognition for corporate governance
- the greatest progress YoY,
8. The only Croatian company to make it to the list of the World's Most Ethical Companies – according to Ethisphere,
9. Winner of the Croatian Sustainability Index (HRIO) award – for the 4th year in a row,
10. Zagreb Stock Exchange Awards in the categories of “Share of the Year” and “Best Investor Relations”,
11. Call You Have to Take – the best international programme for corporate social responsibility and sustainability – winner of the Golden World Award and the European Excellence Award
12. Tools for Modern Times – the first scientifically based national programme for the prevention of risky online behaviour in children, with over 150 primary schools included – SABRE EMEA Awards for best programme in the “Telecommunications” category, HUOJ Grand Prix award for socially responsible business, and the third best project in the DT Group at DT Team Awards,
13. Equal Pay Champion – certificate for ensuring equal opportunities for all employees,
14. Employer Partner, Above & Beyond and Employer Brand Awards Adria – recognitions for the best human resources management practices,
15. Project Management Awards – award for the best medium-sized project (Rijeka Gateway).





*BUSINESS
DIGITALISATION*

DIGITAL SOLUTIONS FOR SUSTAINABLE BUSINESS

HT continuously develops digital solutions, integrating business efficiency with positive environmental and social impacts. ICT technologies offered by HT to B2B and B2G enable business processes' optimisation, cost decrease, energy efficiency increase, safety, and a reduction in resource consumption and GHG emissions.

More information on the business opportunities related to HT's ICT solutions is available in the [HT Group's Annual Report for 2024](#).

E-MOBILITY (EVC)

HT operates a network of electric vehicle charging stations comprising more than 620 connection points in the Republic of Croatia. Access to the network is enabled via the free espOTs mobile app, which provides users with seamless access to the world's largest publicly available EV charging network and facilitates electric vehicle charging payments through a user-friendly platform. By the end of 2024, the number of registered users of the espOTs mobile app reached 26,000, representing a 30% increase compared to the previous year. In 2024, HT's electric vehicle charging network saw a record-high electricity delivery of 3,664,472 kWh, a 45% increase compared to 2023. Considering that an electric vehicle consumes an average of 18 kWh of electricity per 100 kilometres, the electricity delivered by HT's charging stations in 2024 enabled more than 20 million "green kilometres" and prevented the emission of over 3.5 tonnes of CO₂.

Business optimisation solutions

HT's business optimisation solutions enable real-time data collection, improved decision-making, and streamlined business processes, all contributing to reduced energy consumption.

CLOUD-BASED FLEET MANAGEMENT

The cloud-based fleet management solution enables digital 24/7 tracking of vehicle locations, routes and status via HT's mobile network. Data is securely processed and stored in the cloud, i.e. in HT's data centres. At the same time, advanced analytics and detailed reports on vehicle usage, fuel consumption and driver behaviour support informed decision-making. Real-time access to vehicle usage data via mobile or desktop devices leads to improved utilisation, greater operational efficiency and reduced fleet greenhouse gas emissions. Traffic safety is further enhanced through features such as GPS geo-fencing and anomaly alerts. At the same time, additional functionalities like Travel Expenses and Roaming allow users to manage their entire fleet from a single point.

SMART FACTORY

HT's smart factory is a system that integrates an application hosted in HT's data centres with HT's fibre-optic and 5G network. The system leverages Internet of Things (IoT) technologies to connect with users' ERP systems, enabling real-time data collection on manufacturing and implementing automated systems

to optimise processes in manufacturing environments. By adopting this solution, customers can monitor every step of the manufacturing process in detail, log manufacturing cycle phases to facilitate product traceability, analyse the performance of machines and employees, and identify actions to boost manufacturing efficiency, improve process control and reduce downtime. In addition to shortening the manufacturing cycle, smart factories optimise business processes, leading to lower energy consumption and more efficient use of resources, thereby directly contributing to reducing GHG emissions.

COMENERGY

ComEnergy is an energy management solution that enables real-time energy monitoring. Tracking actual consumption provides detailed analytics and supports better energy use optimisation, resulting in cost savings. It can be integrated with existing business systems such as ERP and MES, facilitating implementation, ensuring seamless operation and enhancing decision-making.

SMART CONSUMPTION METERING

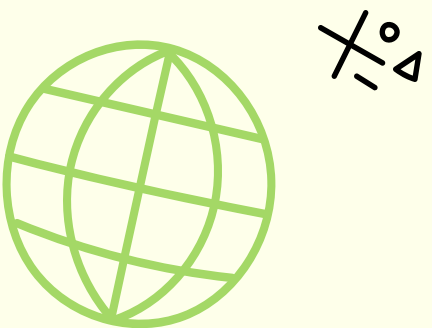
HT's smart consumption metering system uses NB-IoT technology to monitor water, electricity and gas consumption directly. Hosted in HT's data centres, the system provides real-time insights into resource usage, enabling efficient and secure management, losses prevention and seamless integration with existing business systems.

Services for a more efficient public administration

Digital platforms for public administration contribute to increased transparency, greater citizen trust in public institutions and improved quality of life in the community.

ONECITY APPLICATION

OneCity is a digital platform hosted in HT's cloud that integrates various existing municipal systems and platforms into a unified digital framework – a mobile app through which citizens can communicate with city services, access information, manage public utilities and receive real-time notifications. The OneCity mobile app allows users to manage and pay utility bills, offering a clear overview of all expenses and services in one place. In addition to simplifying access to public services, the platform enhances citizens' digital and physical safety. For municipal services, it enables more efficient service delivery at a lower cost, while strengthening public trust through greater transparency.



DIGITAL SOLUTIONS FOR SUSTAINABLE BUSINESS

SMART PARKING

The parking occupancy monitoring system enables quicker identification of available parking spaces, reducing traffic congestion and time spent on the road, thus directly lowering CO₂ emissions and air pollution, and improving the quality of life in urban areas. The system is based on magnetic radar detection and NB-IoT technology, allowing the monitoring of moving and stationary traffic. It is supported by HT's cloud, which can be easily integrated into existing infrastructure. In addition to speeding up the often frustrating search for a parking space, the system also enables users to pay for parking quickly and easily, while providing service operators with data insights on vehicle frequency, parking usage and payment patterns.

AIR QUALITY (AIRQ)

The AirQ solution uses advanced sensors to measure pollutants such as NO₂, CO and other particulate pollutants. Accurate, real-time air quality data is transmitted via NB-IoT technology to Croatian Telecom's cloud and made available to users, helping cities detect anomalies early, reducing health risks and keeping communities informed. AirQ devices are easy to install and feature extended battery life, enabling continuous air quality monitoring.

Business processes digitalisation

By digitalising business activities, users can accelerate and streamline processes, reduce costs and ensure uninterrupted operations within a secure digital environment.

IAAS / PAAS / SAAS (INFRASTRUCTURE, PLATFORM AND SOFTWARE AS A SERVICE)

Infrastructure, Platform and Software as a Service (IaaS, PaaS, and SaaS) in HT's data centre support secure, fast and efficient digital transformation by leveraging tools, methodologies and expert knowledge to enhance the productivity and performance of hardware and software infrastructure. They provide a stable infrastructure and security services essential for uninterrupted operations. This enables users to access advanced technologies for building professional solutions, simplifies device and data integration and management, and increases scalability and efficiency. IaaS, PaaS and SaaS reduce the need for users to maintain their own infrastructure, support faster development cycles, contribute to lower operational costs, reduced energy consumption and decreased electronic waste and CO₂ emissions.

EDI (ELECTRONIC DATA INTERCHANGE)

Electronic Data Interchange (EDI) helps users initiate business digitalisation by replacing paper-based document exchange with electronic communication. EDI can be integrated with ERP systems, enabling complete automation of business processes, faster data exchange and immediate availability. Data transmission via EDI is encrypted and carried out following the highest security standards and the system is hosted in HT's cloud. In addition to reducing equipment costs and depreciation, using EDI also contributes to lower paper consumption.

IoT solutions for better natural resources management

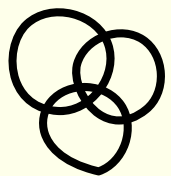
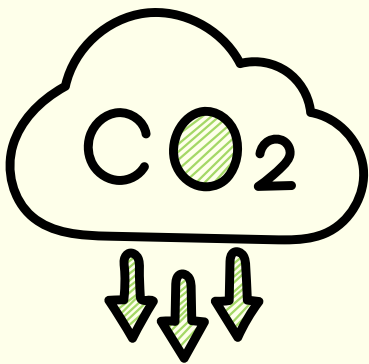
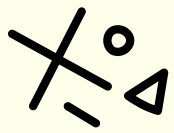
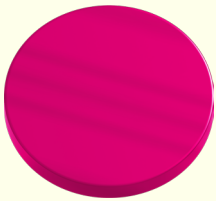
Increasingly unpredictable weather conditions and more severe natural disasters heighten business exposure and drive the need for accurate, real-time data on air, soil and land conditions. HT's IoT solutions enable real-time monitoring of key environmental parameters, supporting more informed decision-making and sustainable resource management.

SMART AGRICULTURE

AgriStick is a solution designed for agriculture and industry that uses sensors to measure air, soil, ground temperature and soil moisture. Measurement results are transmitted via HT's NB-IoT network to a mobile application, enabling monitoring, notifications and reporting parameters at sensor locations. The solution supports a wide range of advanced measurements tailored to diverse user needs, activation and configuration via smartphone, integrating multiple technologies for data visualisation, and improved management of production and vehicles, resulting in numerous potential environmental benefits. An integrated battery and intelligent control system ensure long sensor life and minimal maintenance.

AGRIBOX

AgriBox is a solution that uses a range of sensors to continuously measure air, soil, ground temperature, soil moisture and meteorological values such as wind speed, intensity and rainfall. It uses the NB-IoT network to transmit measurement data to a mobile application that enables monitoring, notifications and reporting on parameters and sensor locations.



INFRASTRUCTURE FOR A DIGITAL SOCIETY

Through continuous network expansion and accelerated modernisation, HT significantly promotes the digitalisation of society and improves internet availability in areas where access was previously limited or services failed to meet modern standards. Investments in network expansion help bridge the digital divide between urban and rural areas and between more affluent and less developed communities. Expanding connectivity in rural regions creates opportunities for individuals and entrepreneurs, improving living standards by providing access to the internet and digital services. This fosters the development of local economies by enabling small businesses to reach online markets and leverage tools to grow and promote their products and services.

In 2024, HT invested nearly EUR 242.9 million, an increase of almost 9.9% compared to the previous year. With these investments, HT reaffirms its strategy as a leader of Croatia’s digital transformation through continuous strengthening of core infrastructure and a strong focus on technological advancement. For end-users, network expansion means more reliable internet, access to digital tools for education, work and entertainment, and improved coverage across all regions of Croatia. In doing so, HT directly improves quality of life and builds a digitally inclusive society. At the same time, HT remains firmly committed to sustainability. The Company uses 100% electricity from renewable sources and, by gradually replacing 3G technology with more energy-efficient 4G and 5G solutions, further reduces its carbon footprint per unit of data transmitted.

Network expansion

The development of network infrastructure brings significant benefits to customers and the economy as a whole. Increased network availability enables business digitalisation, accelerates innovation and enhances competitiveness. Greater access to ultra-fast and reliable internet directly improves the quality of life for

local communities. It supports the development of new entrepreneurial initiatives, stimulates employment and increases the efficiency of public and private service delivery, thereby creating a sustainable foundation for digital and economic progress at the local level.

Alongside mobile network development, the performance of fixed infrastructure has also steadily improved. Average internet speeds have increased by around 25% annually, while data traffic has reached record levels. During the summer of 2024, HT customers generated over 70 million GB of data traffic per month, representing a 30% increase compared to the previous year.

To meet the increasingly complex market demands, HT has further strengthened the resilience and scalability of its network infrastructure by virtualising key functions and implementing automated resource management. This advancement enables faster rollout of new services, greater capacity development flexibility, and improved system availability and reliability. With this, HT is laying a strong foundation for the next phase of digital development, including advanced 5G applications and future 6G scenarios.

In mobile networks, HT has significantly enhanced the capacity and speed of its 5G network. The achieved Speed Score™ in independent testing confirms HT’s leading market position, as recognised by Ookla, umlaut, and HAKOM test results, making HT, for the sixth consecutive year, the holder of the award for the best and fastest network in Croatia.



More information on HT’s network expansion is available under the “ESRS S4 – Consumers and end-users” chapter of the [HT Group’s Annual Report for 2024](#).

Fixed network

HT’s continuous expansion of fibre access infrastructure has been ongoing for over a decade, with a strong focus on implementing Fibre-To-The-Home (FTTH) technology. This long-term, sustainable and scalable solution allows for future upgrades and multi-gigabit internet speeds in line with technological advancements and customer needs. It is important to note that HT is deploying fibre access networks not only in major urban centres, but across the entire territory of the Republic of Croatia, ensuring equal conditions and infrastructure potential for balanced regional development.

The expansion of the FTTH network is providing an increasing number of households with access to gigabit internet speeds – an essential foundation for digital transformation. Between 2022 and 2024, HT made significant progress in delivering on its strategic objectives, with 2024 marking the highest annual increase in fibre coverage of customer units to date – a 20% growth compared to the previous year. Through the systematic expansion of FTTH coverage, HT is nearing its strategic goal of providing gigabit internet access to over 1.1 million customer units in Croatia. As of the publication date of this report, HT’s fibre network spans 160 cities and municipalities across 20 Croatian counties. By extending fixed network coverage to towns and municipalities, HT ensures more balanced digital development and greater access to advanced technologies for nationwide customers.



INFRASTRUCTURE FOR A DIGITAL SOCIETY

Network expansion in rural areas

In addition to expanding its fibre access network through its investments, HT has secured access to fast internet (+40 Mbit/s) and ultra-fast internet (+100 Mbit/s symmetrical) for nearly 150,000 customer units as part of the so-called wave 1 of the EUBB Programme under the Public Call issued by the Ministry of Regional Development and EU Funds of the Republic of Croatia. This was achieved through 13 partnerships established under the structural rules of the National Framework Programme for the Development of Broadband Infrastructure. The programme was successfully implemented across all 13 projects in 10 Croatian counties, where there had previously been insufficient commercial interest in investment, including urban, municipal, suburban and rural areas. In 2024, the following projects were completed:

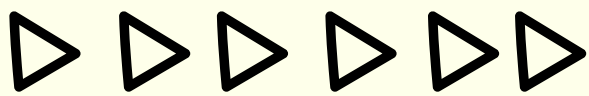
1. Construction of next-generation network infrastructure in the white areas of Osijek-Baranja County,
2. Development of broadband access infrastructure in Brod-Posavina County,
3. Development of broadband access infrastructure in the Dubrovnik area,
4. Development of broadband access infrastructure in the Vukovar area,
5. Development of broadband access infrastructure in the town of Ludbreg and the municipalities of Mali Bukovec, Martijanec, Sveti Đurđ and Veliki Bukovec,
6. Development of broadband access infrastructure in the town of Omiš and the municipalities of Dugi Rat, Podstrana and Zadvarje,
7. Development of broadband access infrastructure for the town of Poreč and the municipalities of Funtana, Kaštelir-Labinci, Sveti Lovreč, Tar-Vabriga, Višnjan, Vižinada, Vrsar and Tinjan,
8. Development of broadband access infrastructure for the area of the town of Sveta Nedelja, the town of Samobor and the municipality of Stupnik,

9. Development of broadband access infrastructure in the Rovinj area,
10. Development of broadband infrastructure for the municipality of Medulin, the municipality of Barban, the municipality of Ližnjan-Lisignano and the municipality of Marčana.

These projects are part of a broader strategy for the digital transformation of the Republic of Croatia and represent a tangible contribution to infrastructure development in less developed areas, supported by European Union funds.

By implementing these projects, HT has confirmed its role as a reliable partner to government institutions in expanding the availability of Next Generation Access (NGA) networks, with a focus on FTTH fibre infrastructure. The projects were carried out in areas not considered commercially viable by most operators, whereby HT contributed to reducing digital inequality. By the end of 2024, HT had completed 99.83% of the contracted projects, providing access to nearly all planned customer units. HT invested EUR 13.4 million in these NGA network construction projects.

In addition, the Ministry of the Sea, Transport and Infrastructure (MMPI) has issued a Public Call for the wave 2 of the EUBB programme, aimed at the development of Very High Capacity Networks (VHCN), co-financed through the National Recovery and Resilience Plan (NRRP) 2021 – 2026. As part of the NRRP, HT submitted 7 project proposals covering 54,000 customer units, continuing the development of broadband infrastructure across the Republic of Croatia. The competent Ministry evaluated HT's project proposals as part of the NRRP with a maximum of points awarded.



Despite the high scores of all submissions, due to limited funding available from the Ministry, grants were allocated to only three of the 7 projects. In 2024, HT was awarded grants for the following projects.

- Development of broadband access infrastructure in the town of Novalja,
- Development of network infrastructure in the municipalities of Bebrina, Brodski Stupnik, Bukovlje, Oriovac, Podcrkavlje and Sibinj,
- Construction of broadband infrastructure for the town of Bjelovar and the municipalities of Rovišće, Zrinski Topolovac, Kapela, Veliko Trojstvo, Severin, Šandrovac and Nova Rača.

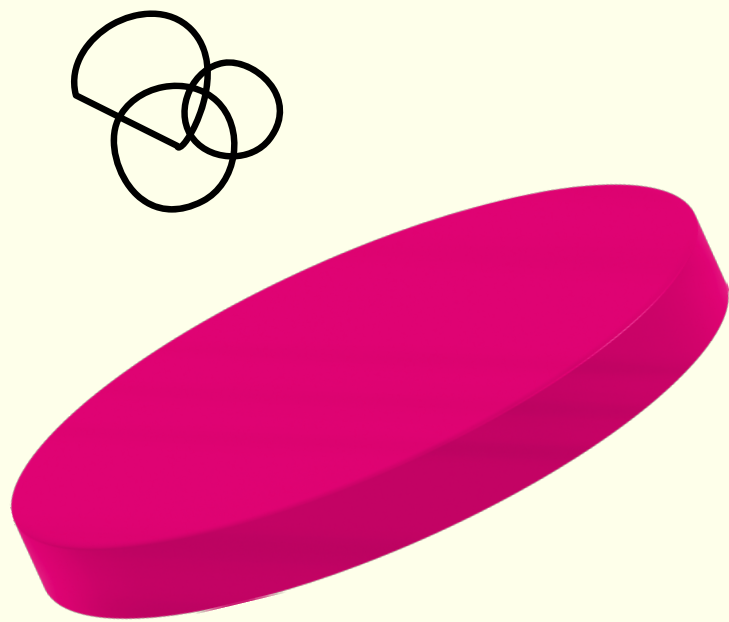
These three projects cover a total of 27,804 potential customers.

In 2024, as part of all seven submitted EUBB wave 2 projects, HT successfully conducted the most financially significant procurement procedures for designing and constructing FTTH networks. These activities were carried out within the tight project implementation time frame, which ends on 30 June 2026. This established a solid foundation for the timely implementation of FTTH network, both for the three projects that had been already awarded grants, and for the remaining four projects for which grant agreements were signed in April 2025. This ensures the connection of all 54,000 customer units planned within the seven approved project proposals.

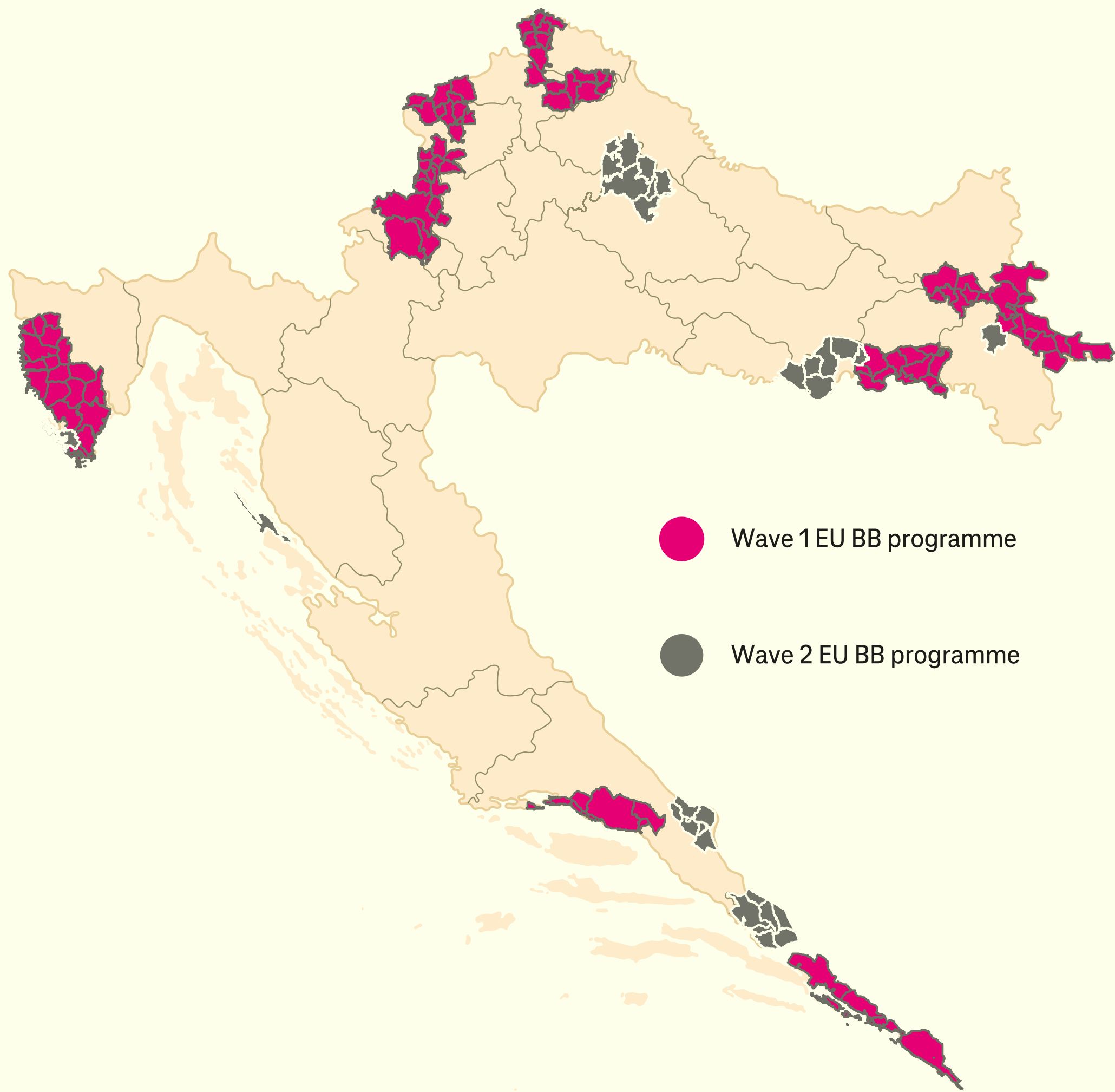
By implementing NGA and VHCN networks under the first and second waves of EUBB projects, HT is enabling residents of rural and suburban areas to access a wide range of information and communication services previously limited or unavailable due to the lack of adequate infrastructure. The new network

infrastructure provides stable internet access. It enables using key public digital services such as e-Citizens, e-Health, and e-Student Report Card ("e-Dnevnik"), while significantly improving access to remote work and education. Citizens can enjoy a wide array of digital content daily, from social media and music and video streaming services to IPTV and online gaming.

For business and public customers, the deployed networks unlock new opportunities. They range from remote work and cloud service use to the seamless transfer of large data volumes and the implementation of advanced digital solutions. High-speed, reliable connectivity forms the foundation for adopting AI tools and other technologies that will play a central role in business development and public service modernisation in the years to come.



INFRASTRUCTURE FOR A DIGITAL SOCIETY



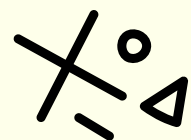
Mobile network

HT is systematically expanding the availability of its network solutions to ensure high-quality connectivity across all parts of Croatia, including less accessible rural areas. Today, HT's mobile network has achieved almost full population coverage. 4G coverage extends to 99% of Croatian residents and, in 2024, 5G network provided ultra-high speeds to over two million people with ongoing signal expansion.

Extending the network to rural areas improves local populations' living standards and connects public institutions (e.g. healthcare facilities), enabling access to the internet and digital services. This fosters the development of the local economy, allowing small businesses to reach online markets and leverage tools to grow and promote their products and services.

In 2024, HT further enhanced the capacity and coverage of its 5G network. Intensive network modernisation and the development of 5G infrastructure led to a significant increase in data speeds and improved user connectivity. The development of mobile communications at HT is

firmly focused on a future built on 5G technology, which enables gigabit speeds and paves the way for a new level of connectivity. In 2024, 5G high-speed network coverage reached 50% of the population, strongly focusing on implementing the 3.6 GHz spectrum layer. This has laid a solid foundation for the broader rollout of advanced services such as Fixed Wireless Access (FWA), which provides users with high-speed internet access, landline voice services and IPTV content. 5G technology offers numerous benefits, from faster internet access and lower latency to massive device connectivity, supporting millions of devices per square kilometre, which is essential for developing smart industrial solutions. As such, the 5G network represents a significant opportunity for transforming Croatia's economy. By the end of 2024, over two million residents were covered by ultra-high-speed 5G signal.



INFRASTRUCTURE FOR A DIGITAL SOCIETY

Implementation of the first private 5G campus network in Croatia

A practical example of 5G technology deployment is equipping the new Rijeka Gateway container terminal with state-of-the-art 5G infrastructure, an initiative for which HT received an award from the International Project Management Association. This is one of Croatia’s most important infrastructure projects and the region’s first container terminal to be remotely operated. The project aims to increase operational efficiency, optimise logistics, and ensure reliable communication among systems. The terminal will be a testing ground for a new network management model. It will migrate to an advanced 5G Standalone (SA) architecture, making the Rijeka Gateway the first industrial customer of Network Slicing in Croatia. With a 50-year concession, the Rijeka Gateway is becoming a key hub for container traffic to the European hinterland and a vital driver of local economic development.



Network modernisation

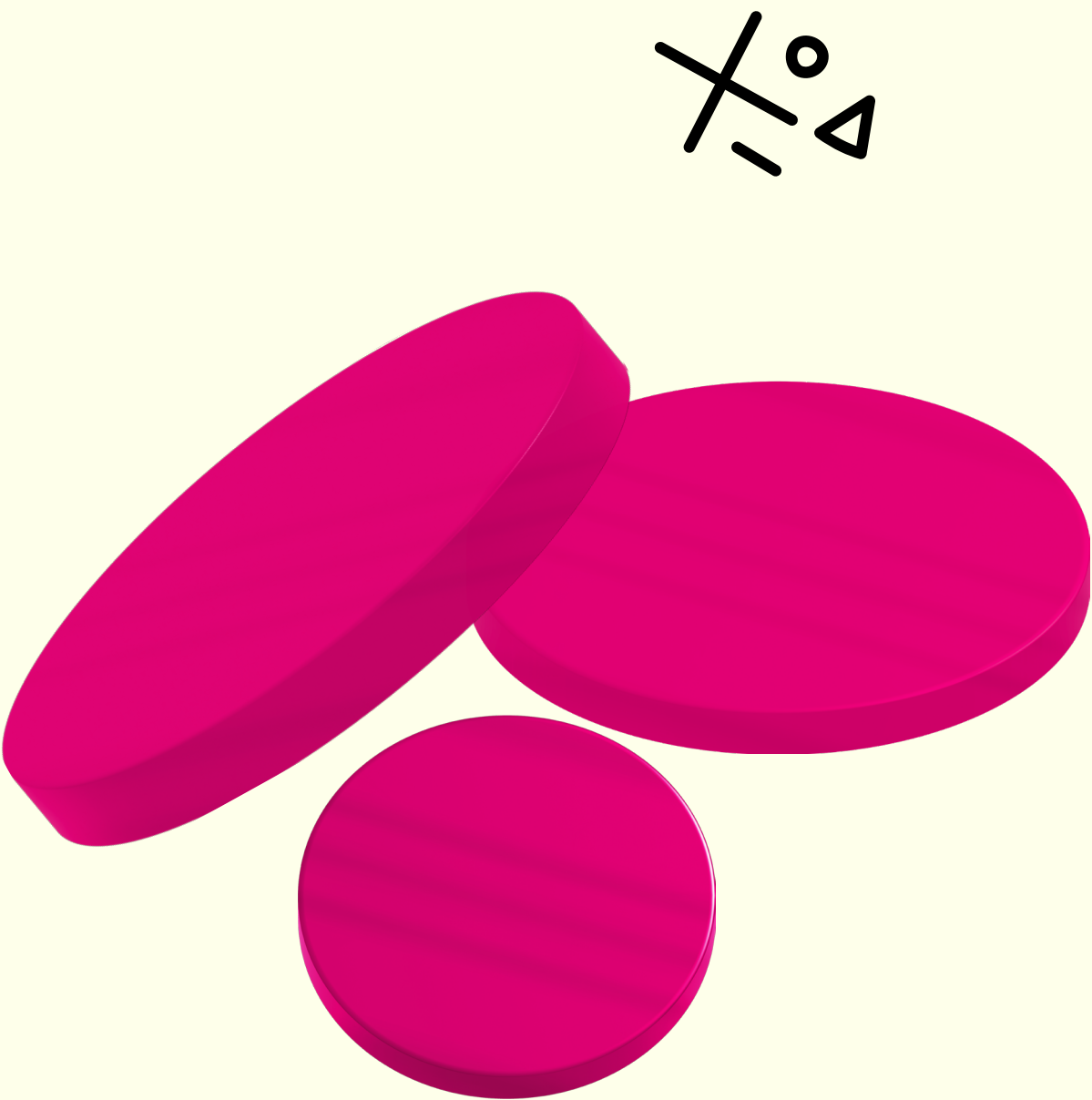
In 2024, HT carried out a series of key technical upgrades to improve its mobile network. These included cloud computing network functions through CaaS models, modernisation of data centres and voice platforms, and migrating services accompanied by the decommissioning of legacy systems. This laid the groundwork for the successful shutdown of the 3G network. The 3G phase-out, initiated in 2024, was completed in the first quarter of 2025. This step freed up critical resources for modern technologies, improved energy efficiency, and enhanced customer experience.

The retirement of the copper access network is also underway, and it is being replaced by a more energy-efficient and environmentally friendly

next-generation network. The key to a successful transition is the availability of modern fibre infrastructure and the encouragement of customers to migrate. Although some progress has been made, approximately two-thirds of users in Croatia still access the internet via copper, highlighting the ongoing need for education and incentive measures to support the transition to higher-performance, lower-cost technologies.

As part of the rollout of fibre-based Next Generation Access (NGA) networks, in 2024 HT continued decommissioning outdated broadband access nodes, migrating users to newer-generation nodes. This transition brought significant energy savings: while the old nodes consumed 0.51 GWh, the new ones consume just 0.03 GWh, resulting in a saving of 0.48 GWh and reaffirming HT’s commitment to more sustainable and environmentally responsible operations.

In November 2024, HT, in collaboration with the company Markoja, introduced the innovative Ecopol wooden telecommunications tower in Velika Gorica. This 40-metre self-standing conical structure is made of technologically treated wood. This new-generation material combines high elasticity and long-term durability with minimal environmental impact. Developed with a focus on sustainability and safety, Ecopol towers are fire-resistant and offer added protection for embedded cabling. Compared to conventional steel towers, Ecopol towers emit twice as little CO₂, and all materials are fully recyclable.



CONTRIBUTION TO CLIMATE PROTECTION

The growing effects of climate change and the increasingly unpredictable and destructive consequences of extreme weather events, driven by unsustainable resource consumption, pose a significant threat to ecosystems, infrastructure, and the global economy. Digitalisation holds the potential to accelerate the necessary shift to a low-carbon economy and steer society toward a more sustainable future. Recognising the urgency and seriousness of this challenge, climate action is fully integrated into HT Group's corporate strategy.

Emission reduction measures in our own operations

The HT Group is committed to implementing climate change mitigation measures to reduce its carbon footprint and offer solutions that help customers lower theirs.

Key measures to reduce Scope 1 and 2 emissions include:

- Procuring electricity exclusively from renewable sources,
- Improving energy efficiency by deploying newer technologies and phasing out legacy systems,
- Downsizing and modernising office space,
- Electrifying and reducing the vehicle fleet,
- Installing heat pumps.

100% electricity from renewable sources

The HT Group has been sourcing 100% of its electricity from renewable sources since 2021. HT ensures electricity from renewable sources through the following mechanisms:

- A ten-year virtual Power Purchase Agreement (vPPA),
- Procurement of green electricity with "ZelEn" certification from HEP Opskrba,
- Guarantees of Origin (GoO) from the international market for the rest of electricity consumed in properties leased from natural and business persons, for which, according to the information provided by HROTE (Croatian Energy Market Operator), it is impossible

to purchase certificates on the Croatian market.

2024 saw the beginning of electricity production and delivery under the ten-year virtual Power Purchase Agreement (vPPA) with Liburana d.o.o., signed by HT in 2023. Liburana is 100% owned by Professio Energia d.d. In the last quarter of 2024, this power plant delivered 14,500 MWh of electricity, accounting for 13% of HT's total yearly electricity consumption in 2024. HT's total yearly electricity consumption in 2024 was 111,757 MWh. Once the project reaches full production capacity, it will be supplying 50,000 MWh annually. This means the vPPA would cover approximately 45% of HT's annual electricity needs based on 2024 consumption levels.

In addition, HT continued to invest in installing heat pumps to reduce its reliance on fossil fuels and lower GHG emissions. In 2024, HT installed heat pumps at two business locations: Rijeka and Pazin.

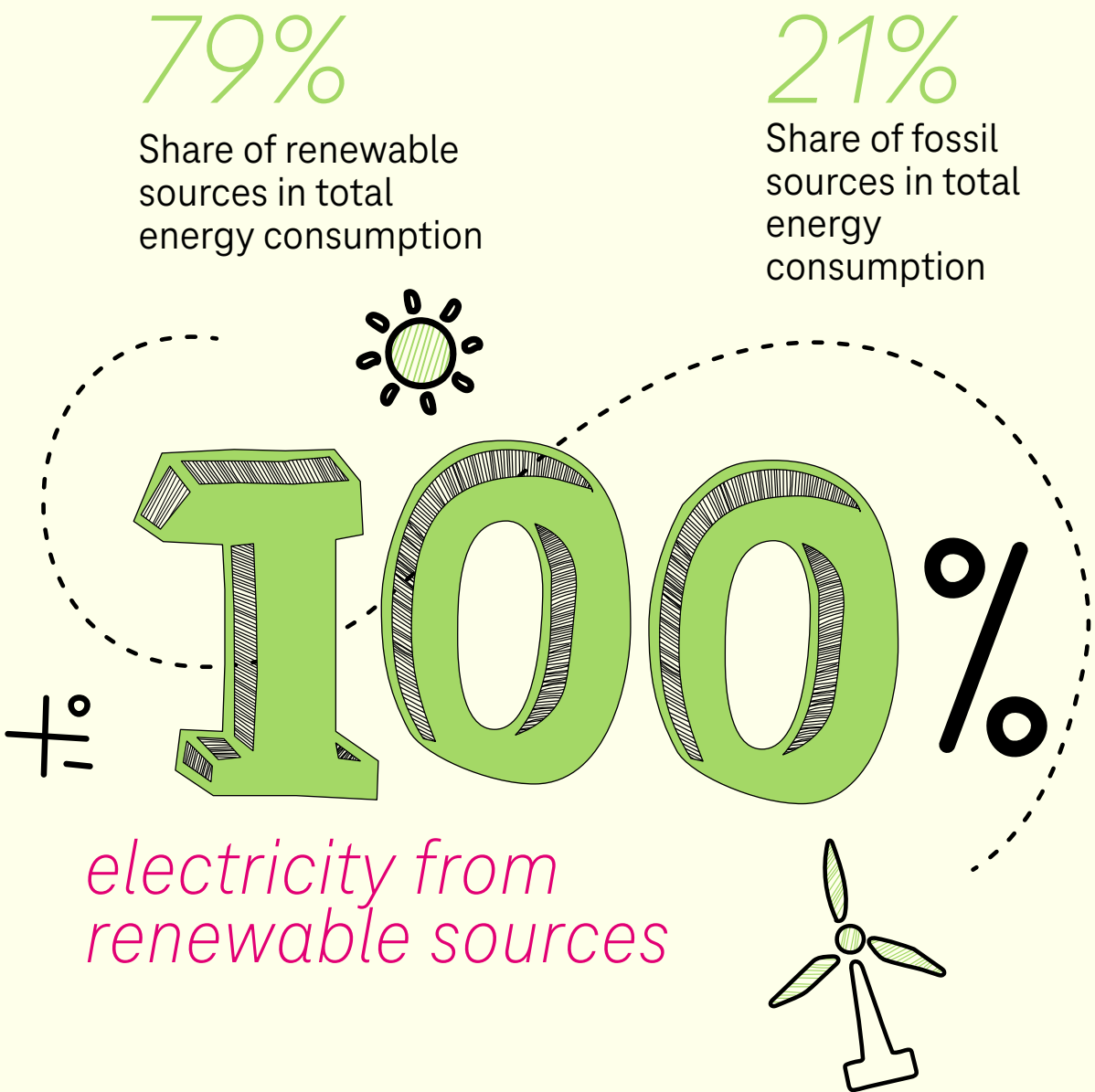
Increasing energy efficiency through modernisation

The HT Group takes a strategic approach to developing business processes related to data centres, which require constant investment in modernisation. HT is systematically modernising electro-energy and thermo-technical systems with energy-efficient equipment that aligns with global standards (according to Uptime Institute guidelines). In parallel, a data centre consolidation and modernisation strategy is being implemented, with the goal of optimising capacity and business processes across two production, two EDGE, and two B2B data centres with highly reliable infrastructure.

In 2024, activities continued in the cloudification of network functions, securing a leadership position within the DT Group with 92% of NT network functions implemented in a cloud environment. This strategic direction was further strengthened by the launch of the second-generation NT DC Cloud solution, based

on the Container as a Service (CaaS) model. A new CaaS environment was established in Rijeka, within which 5G core network functions were implemented. The solution enables significantly more efficient use of data centre hardware resources, specifically the servers running network functions. Such improvements result in a 20% increase in energy efficiency.

The data centre consolidation process has also commenced, with the aim of optimising infrastructure. At HT's data centre in Split, a new system room has been equipped with a system featuring advanced energy characteristics and the maximum data centre energy efficiency value (PUE), providing the prerequisites for introducing the CaaS platform at this location. Additionally, in 2024, a building permit was obtained, and construction on the modern DC Remete site began. It is scheduled to be completed by the end of 2025. The new data centre is being built to the highest industry standards, with a strong focus on energy efficiency and sustainability.

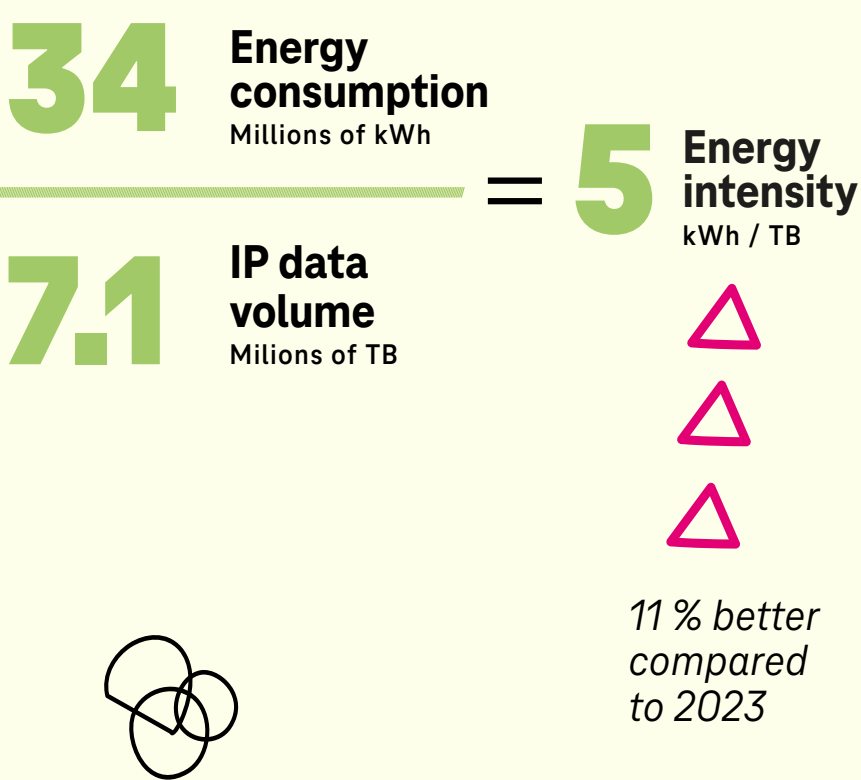


CONTRIBUTION TO CLIMATE PROTECTION

As part of further technological advancement, the introduction of AI tools for optimising cooling systems in data centres has begun. Artificial intelligence in this domain will lead to further reductions in electricity consumption, supporting the sustainability of the technological infrastructure. In 2024, the migration of the local TV platform to a centralised solution was also completed. This transition provided users with more advanced functionalities and improved user experience while retiring outdated, energy-inefficient equipment.

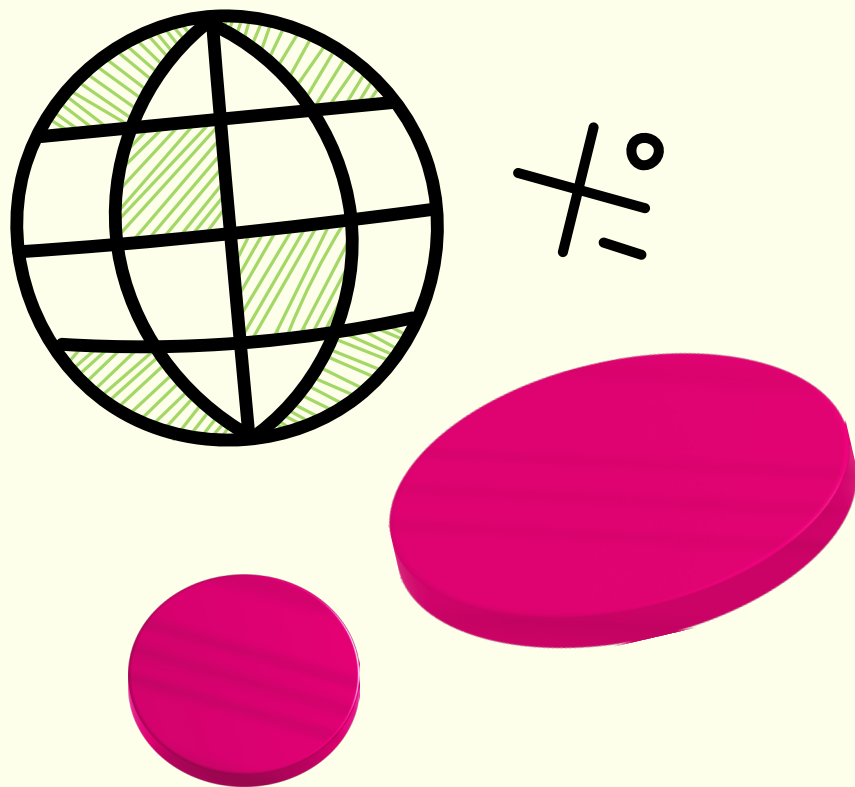
The construction and modernisation of the network in 2024, as described in the chapter Infrastructure for a Digital Society, contributed to an 11% improvement in the energy intensity of the fixed network, as measured by the ratio of energy consumption to data transmission volume and compared to 2023.

The energy intensity of the fixed network in 2024

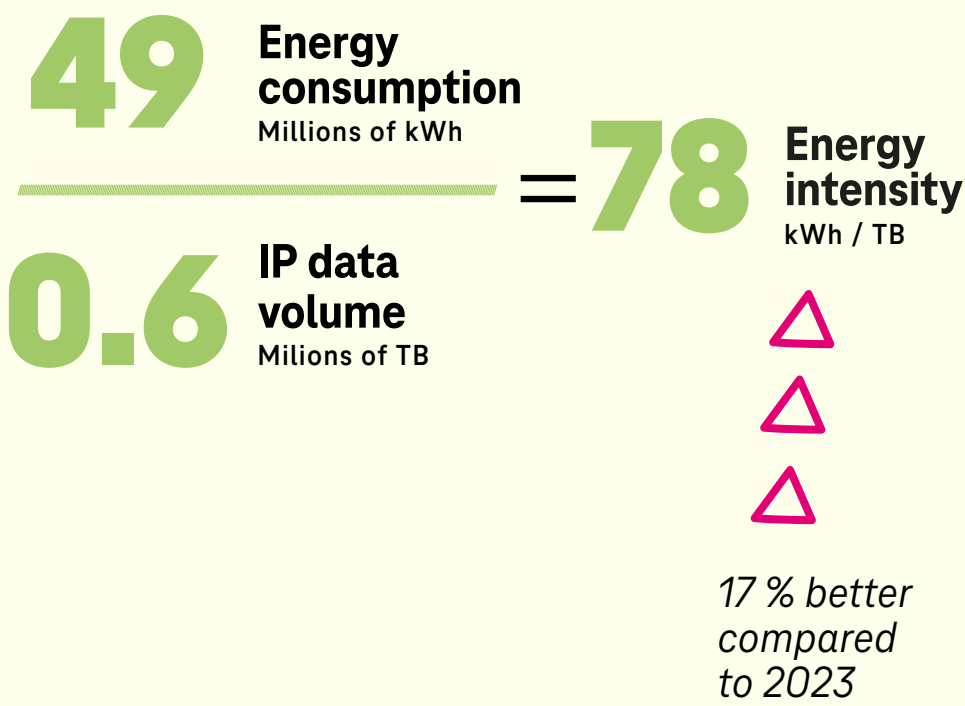


Complete 3G network shutdown

With the completion of the 3G network shutdown, HT modernised its infrastructure and significantly improved energy efficiency. Compared to 2023, the energy intensity of the mobile network was reduced by 17%, while data traffic increased by as much as 32%, confirming the efficiency of new technologies amid the growing digital demand. By releasing the 3G frequency spectrum and network capacity, 4G and 5G technologies were further enhanced, enabling users to access more advanced services and improving the overall user experience. Croatia’s 3G network shutdown project was carried out throughout 2024 and completed at the end of January 2025.



The energy intensity of the mobile network in 2024



Path to Net Zero

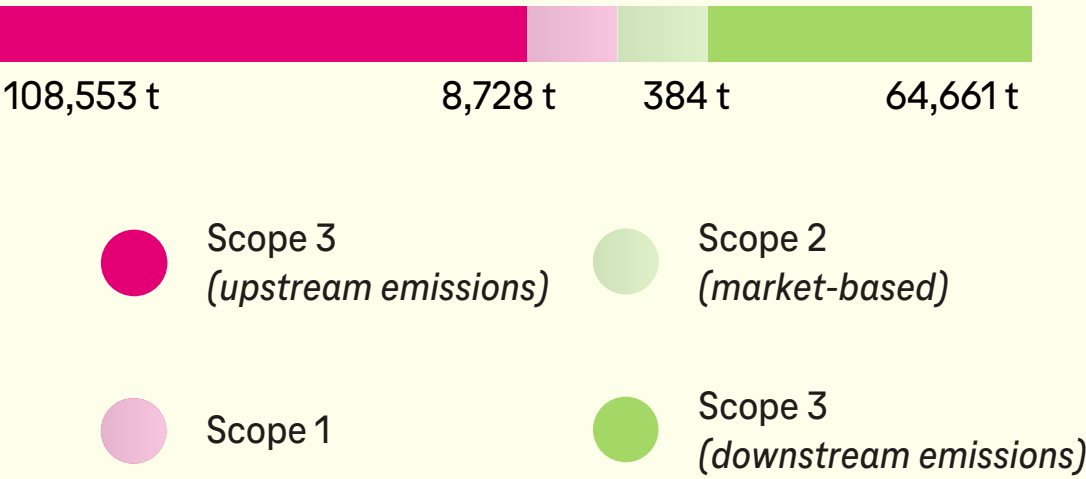
Fight against climate change is integrated into the HT Group’s corporate strategy through science-based GHG emission reduction targets across the entire value chain, adopted by all DT Group members. The climate targets of the HT Group, in which the HT Group actively participates, are aligned with the European Green Deal and have been approved by the Science Based Targets initiative (SBTi), confirming their alignment with the goals of the Paris Agreement. To ensure the achievement of its climate targets, DT has developed a climate transition plan, in whose implementation the HT Group will also participate, among others.

Scope 3 GHG emission reduction measures focus on extending product lifecycles, improving the energy efficiency of sold devices, and ensuring sustainable sourcing of materials and packaging.

The HT Group’s portfolio of ICT solutions for a low-carbon economy, such as smart factories and cloud-based operations, positively contributes to reducing the carbon footprint of business operations.

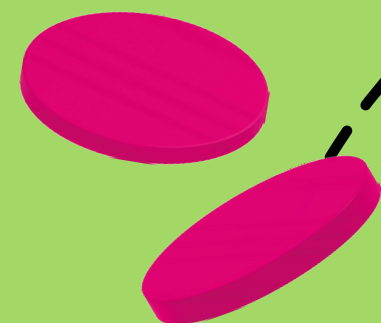
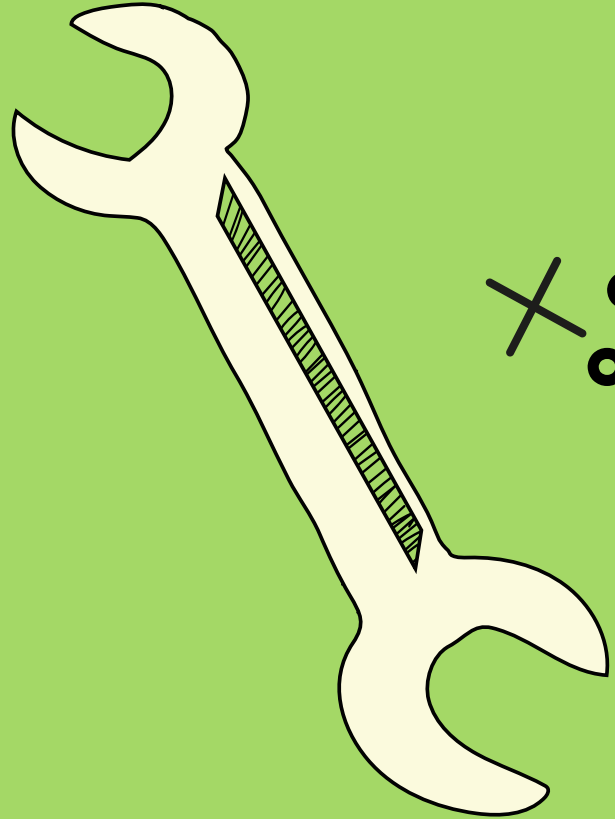
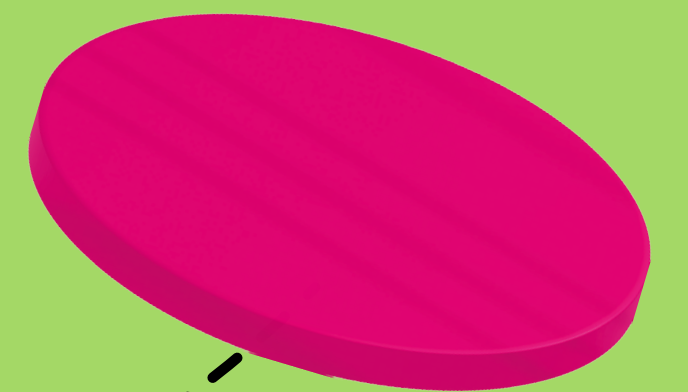
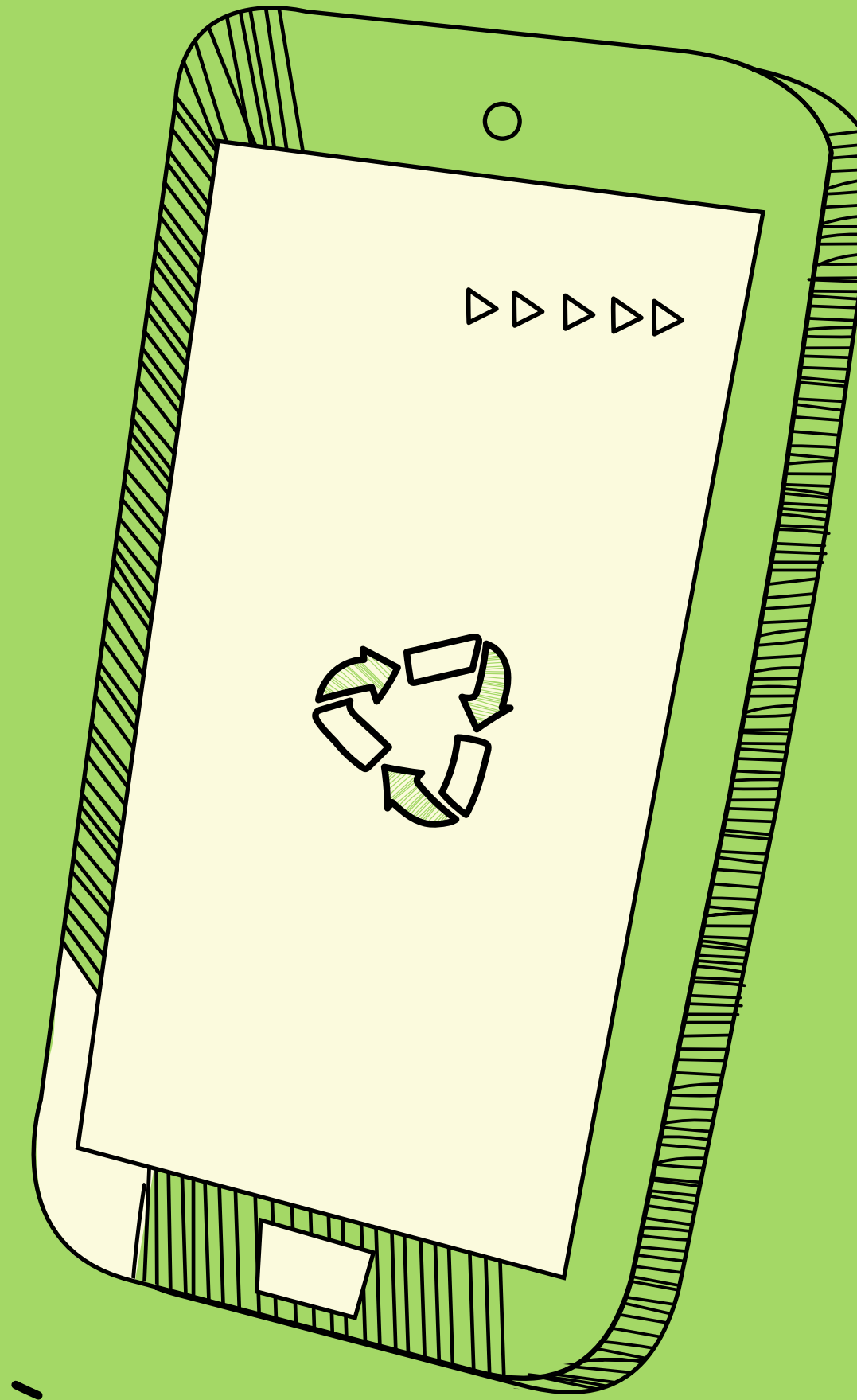
Energy-efficient hosting on HT’s infrastructure and optimising processes through online services, delivered and consumed via that infrastructure and its products, can save users energy.

Gross Scope 1, 2, and 3 GHG emissions



More information on HT’s GHG emissions reduction targets is available under the “ESRS E1 – Climate change” chapter of the HT Group’s Annual Report for 2024.





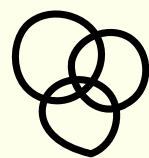
*RESOURCE-EFFICIENT
BUSINESS*

CIRCULAR BUSINESS MODELS

The linear economy model based on the singular use of materials has led to unsustainable levels of consumption of natural resources that, in addition to threatening the stability of ecosystems, pose an increasing challenge for companies regarding the availability of raw materials. In response to this challenge, business models based on the circular economy principles, enabling a more sustainable approach to business, are increasingly being applied. HT's ambition is to achieve full circularity of technology and devices along the entire value chain, enabling the reuse of materials. To this end, HT applies different approaches, introduces new offers and develops cooperation with various stakeholders, including HT's suppliers and customers, to find joint opportunities and enable circular business models. Besides preserving resources and avoiding consumption, the goal is to keep products and materials usable for as long as possible and reintroduce them into the cycle. Through extended use and reuse, multiple positive effects are achieved – saving resources and energy and reducing greenhouse gas emissions, contributing thus to climate protection.

Models enabling return and extension of service life of devices

By introducing circular business models, including support for out-of-warranty repairs, extended manufacturer warranties and refurbishment of used devices, HT, in collaboration with its customers and partners, contributes to extending the lifecycle of its devices. This reduces the amount of electronic waste and positively impacts environmental preservation and more efficient resource use. These results have been achieved through a series of initiatives and models, with a focus on those that embed circular economy principles at the point of sale:



TAKEBACK & RECYCLE

Take Back & Recycle is a model that enables customers to bring their old electronic equipment to a point of sale at any time. Launched in 2023, this initiative offers customers discounts on new devices through periodic campaigns. Returned equipment does not need to hold market value to be eligible, thereby encouraging participation from a wider range of customers. This initiative was launched in 2023.

TRADE IN

TradeIN is a model that offers customers a discount on a new device equal to the appraised value of their used, functional device, provided it has a minimum market value of one euro. The returned device is then refurbished and reintroduced to the market, extending its lifespan. This model was launched in 2024.

FORWARD TRADE IN – FTI

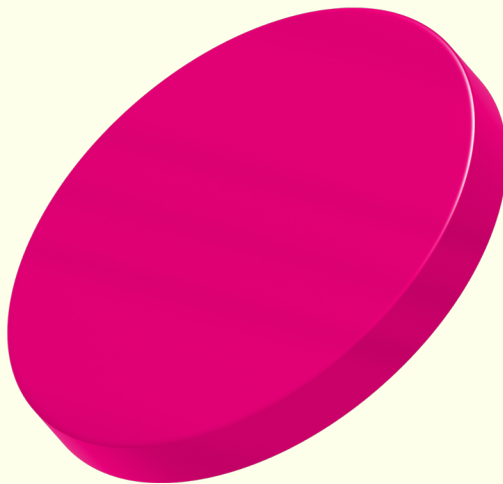
Launched in May 2024, the Forward TradeIN model introduced a novel approach to device procurement for our customers. Under this model, the customer pays the device's value, minus its residual value, either in 24 monthly instalments or upfront. If the customer chooses to keep the device, the remaining amount (the residual value) can be settled in a lump sum or through an additional 12 instalments. Also, the device can be returned after the expiry of the 24 months with no further obligation. The programme was launched in May 2024, and by the end of 2024, 13,000 devices had been sold. The first device returns under this model are expected in 2026.

DEVICES AS A SERVICE – DAAS

Since 2024, in collaboration with the global company Bolttech, HT has been offering the Device as a Service (DaaS) business model. This model enables business customers to use mobile phones and tablets for a fixed period under contractual obligation. The model includes a manufacturer's warranty for the entire contract period (12, 24 or 36 months), comprehensive support, regular repairs and device replacements as part of subscription package. The DaaS model enables better device traceability and lifecycle management, extending the device lifespan to up to five years and eliminating the need for customers to purchase new devices. This avoids negative environmental impacts, energy consumption and the use of primary raw materials in manufacturing new devices. Thanks to its transparency and emphasis on extending device service life, this business model achieves the highest device return rate. Also, it minimises the amount of electronic waste generated during replacement and supports systematic device recycling, reducing the number of devices that fall outside formal waste management systems.

HT BUSINESS GUARANTEE

The limited warranty period of 12 to 24 months does not cover the most common mobile device malfunctions, such as mechanical damage, exposure to moisture, theft or damage due to negligence. High out-of-warranty repair costs encourage customers to replace devices, increasing the volume of electronic waste. HT Business Warranty provides business customers an additional 12 months of factory warranty. It includes extended coverage for screen damage and comprehensive protection against mechanical damage, moisture-related damage, theft or negligent use. This level of security, offered in collaboration with the company Partum, extends device lifespan, reduces repair costs and contributes to reducing electronic waste.



RESPONSIBLE RESOURCE USE

At HT, we take a holistic approach to the responsible use of resources and implementing circular economy principles. Through strategic, proactive and preventive action, at the HT Group, we strive to reduce waste generation by maintaining, repairing and renovating equipment, while reusing materials that can be used as valuable resources. In doing so, the HT Group recycles waste and materials in an environmentally responsible manner, mainly referring to waste generated during the construction, replacement and modernisation of network infrastructure.

Most of the HT Group's waste is generated during modernising network infrastructure and regular business operations. To manage this waste effectively, the HT Group employs the “Prevent – Reduce – Reuse – Recycle” approach to minimise harmful impacts in the context of resource inflows and their use in network technology. Commitment to responsible waste management is a key part of HT’s operational practices, focusing on recycling technological waste.



More information on HT’s waste management practices is available under the “ESRS E5 – Resource use and circular economy” chapter of the [HT Group's Annual Report for 2024](#).

Collection and recycling of electronic waste

HT promotes circular economy principles through initiatives focused on collecting electronic waste and aims to raise public awareness about the importance of its proper disposal. HT focuses on activities that enable the extension of device lifespans, encourage responsible resource use and foster sustainable consumer habits. In 2024, HT further expanded its efforts related to the disposal of electronic equipment used by its business customers. Since July 2024, HT has been included in the Register of Waste Management Brokers, officially confirming its role in the responsible electronic waste management system. In cooperation with authorised partners, collection drives for old and unused equipment have been organised.

As early as 2021, HT set clear targets for increasing the annual return rate of mobile devices, aiming to foster a circular economy in the customer equipment segment. HT’s ambition is to continuously improve the ratio of returned to purchased devices to reduce environmental impact and extend device lifecycles.

The “Call You Have to Take” platform

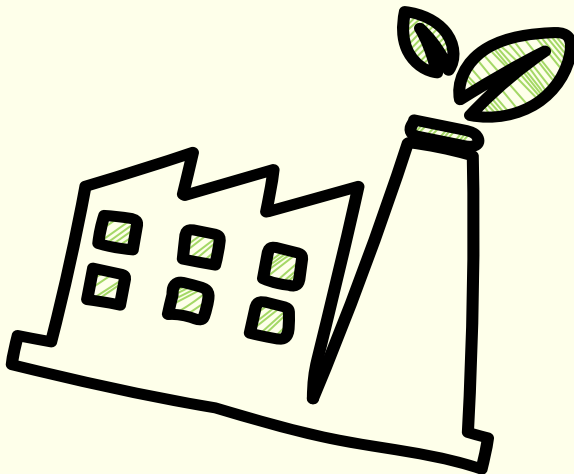
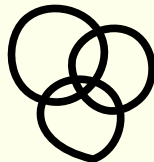
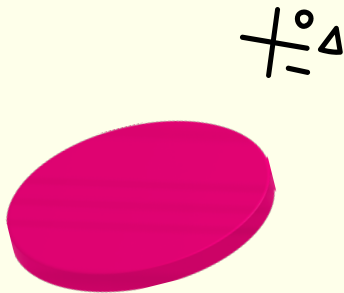
Electronic waste is the fastest-growing category of waste, with more than 5 billion phones discarded globally each year. Old devices severely pollute the environment, and toxins from e-waste remain in the human body for 7 to 11 years after inhalation. The „Call You Have to Take” platform, launched by HT in 2023, is a programme aimed at a more efficient use of natural resources, circular economy, more responsible management of electronic equipment and waste, particularly related to old

mobile devices. The programme aims to educate customers about the return and recycling of electronic equipment and encourage citizens and companies to participate in sustainability initiatives and contribute to positive social change, so that future generations can enjoy our planet equally.

Key facts about the positive impacts of recycling electronic devices include:

- Smartphones are made of numerous materials, over 80% of which can be reused,
- Producing a single phone requires approximately 12,000 litres of water, 1 GJ of electricity and 60 different metals,
- Each tonne of recycled waste reduces CO₂ emissions by two tonnes.

The “Call You Have to Take” has repeatedly been awarded for excellence, both nationally and internationally. In 2024, this platform was named the best European sustainability communication campaign and received the European Excellence Award 2024. The campaign also won two Golden World Awards 2024 from the International PR Association for the best global social responsibility and environmental protection campaigns. It ranked among the top five global campaigns in the “Purpose Award” and “Strategic Communications Award” categories and won gold for corporate social responsibility at the GrandPRix of the Croatian Public Relations Association.



RESPONSIBLE RESOURCE USE

In 2024, HT made considerable progress in the sustainable management of electronic equipment and in the successful return of mobile devices through circular business models. The targeted return rates for mobile devices, based on the number of units sold, are as follows:

- 2024.: 10 %
- 2025.: 13 %

The mobile device return target for 2024 was set at 10% of total devices sold in that year. This target was surpassed due to the effective implementation of circular business models, i.e. over 39,130 mobile devices were collected, representing 13% of total sales.

Mobile equipment collected through business models in 2024

Smartphones and mobile phones

Trade IN	3,676
Number of devices collected from customers for further processing	
TakeBack & Recycle	26,143
Number of devices collected from customers for recycling	
Total number of smartphones and mobile phones collected	29,819

Other equipment (tablets, mobile routers, chargers, headphones, smart watches)

TakeBack & Recycle	9,311
Number of devices collected from customers for recycling	

Total mobile equipment collected 39,130



The return process places the most significant emphasis on mobile phones, mobile routers and tablets, but other devices such as chargers, smart watches and headphones are also collected. Although collection is conducted through all available models, the largest volume comes from those that promote device lifespan extension and waste reduction starting at the point of sale. Through the previously described business models such as Trade IN, Forward Trade IN and DaaS, HT continuously develops solutions that enable responsible resource management, reduce electronic waste and improve the overall customer experience.

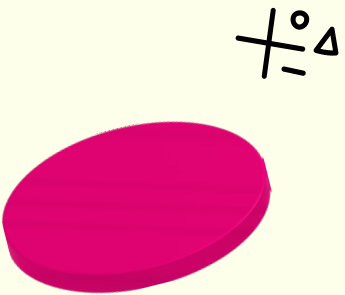
HT also continuously collects and refurbishes fixed equipment leased to customers. Since the fixed equipment remains under HT’s ownership, its collection and sustainable management are significantly simpler.

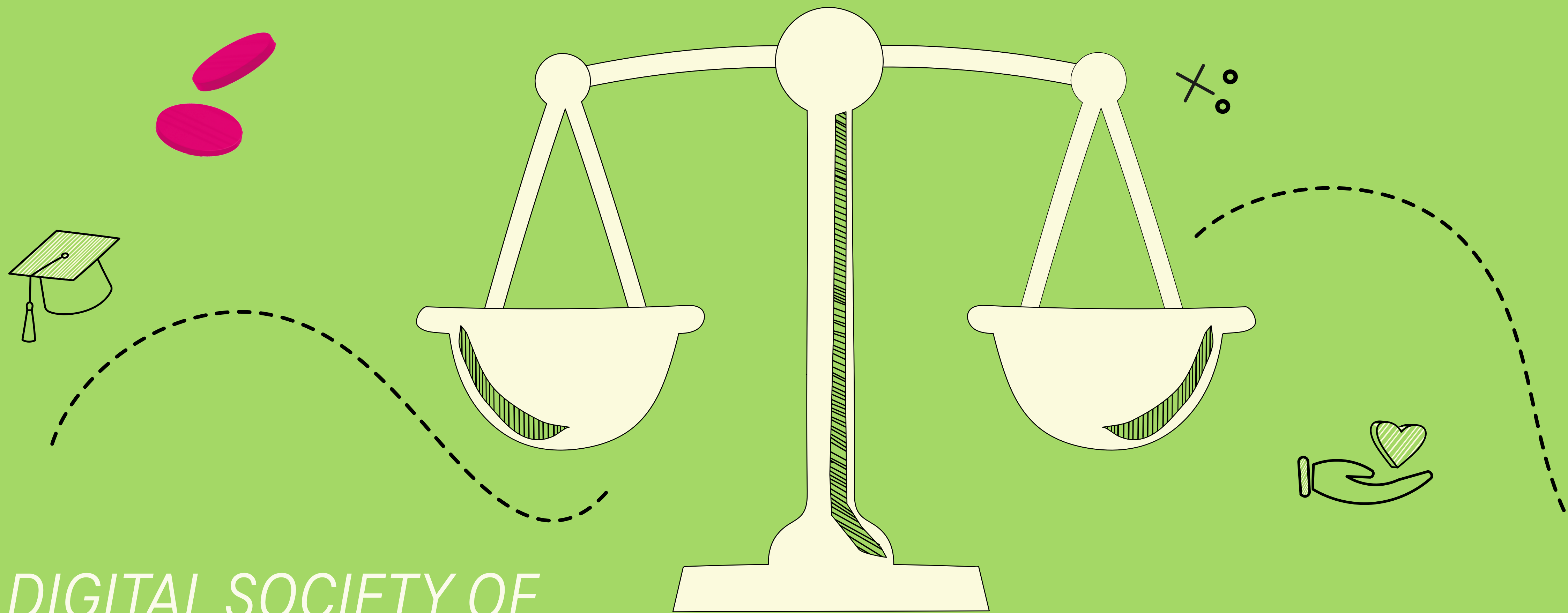
Fixed equipment collected and/or refurbished in 2024



E-bill

The share of HT customers opting for e-bills has been steadily increasing, with e-bills accounting for 65% of all invoices by the end of 2024. This figure comprises both natural persons, who account for 64%, and legal entities, whose share is 72%. The e-bill replaces the traditional paper invoice sent by post and is delivered digitally via the Moj Telekom app, email, or the Moj Telekom portal. Also, redesigning the invoice format in 2024 resulted in fewer pages per invoice. Aforementioned initiatives, e-bill and invoice redesign, HT avoided using 25 million sheets of paper for printing invoices and generating 2 thousand tonnes of waste. Additionally, the need for envelopes and transport was reduced, further reducing CO₂ emissions.





*DIGITAL SOCIETY OF
EQUAL OPPORTUNITIES*

DIGITAL INCLUSION

HT believes digital technologies can improve everyone's lives and drive positive change. Therefore, HT continuously develops accessible solutions to all stakeholders, enabling them equal opportunity to participate in the digital society. HT's ambition is to strive to connect everyone in Croatia with opportunities offered by digitalisation, promoting equality, inclusion and diversity to build a better future. Digitalisation can also bring risks concerning child safety, online abuse and hate speech and deepening digital inequality among people. In its digital transformation process, HT strives to remove digital barriers and ensure a safe and inclusive digital environment for everyone, especially vulnerable groups.

More information on HT's digital inclusion practices is available under the "ESRS S4 – Consumers and end-users" chapter of the [HT Group's Annual Report for 2024](#).

Tools for Modern Times

HT consistently reaffirms its commitment to socially responsible practices through its initiatives to create a safer and healthier digital environment for children and young people. Given the children's exposure to digital content and the growing risks such as hate speech, false information, social media addiction, online violence and contact with strangers in virtual spaces, HT has recognised its responsibility not only in developing technology but also in creating a safe framework for technology use.

In response to this challenge, in September 2023, HT launched its "Tools for Modern Times" programme, which HT continued developing and expanding in 2024. "Tools for Modern Times" is Croatia's first structured and science-based educational programme to prevent risky online behaviour among upper primary school students. The programme is based on a proactive approach that, rather than merely providing information, focuses on developing students' social and emotional skills while strengthening their responsibility and awareness of the risks in the digital world. The programme covers all relevant stakeholders – students, educational staff and parents – ensuring that its preventive impact is both comprehensive and sustainable.

About the "Tools for Modern Times" programme:

- It was implemented in 157 elementary schools in 20 counties, which is 31% higher than the initially planned scope of 120 schools in 18 counties. As of the end of 2024, more than 2,000 students have finished the programme successfully,
- A total of 5,655 students were covered in the programme and 355 facilitators were trained, which is 48% higher than the initially planned number of facilitators trained,

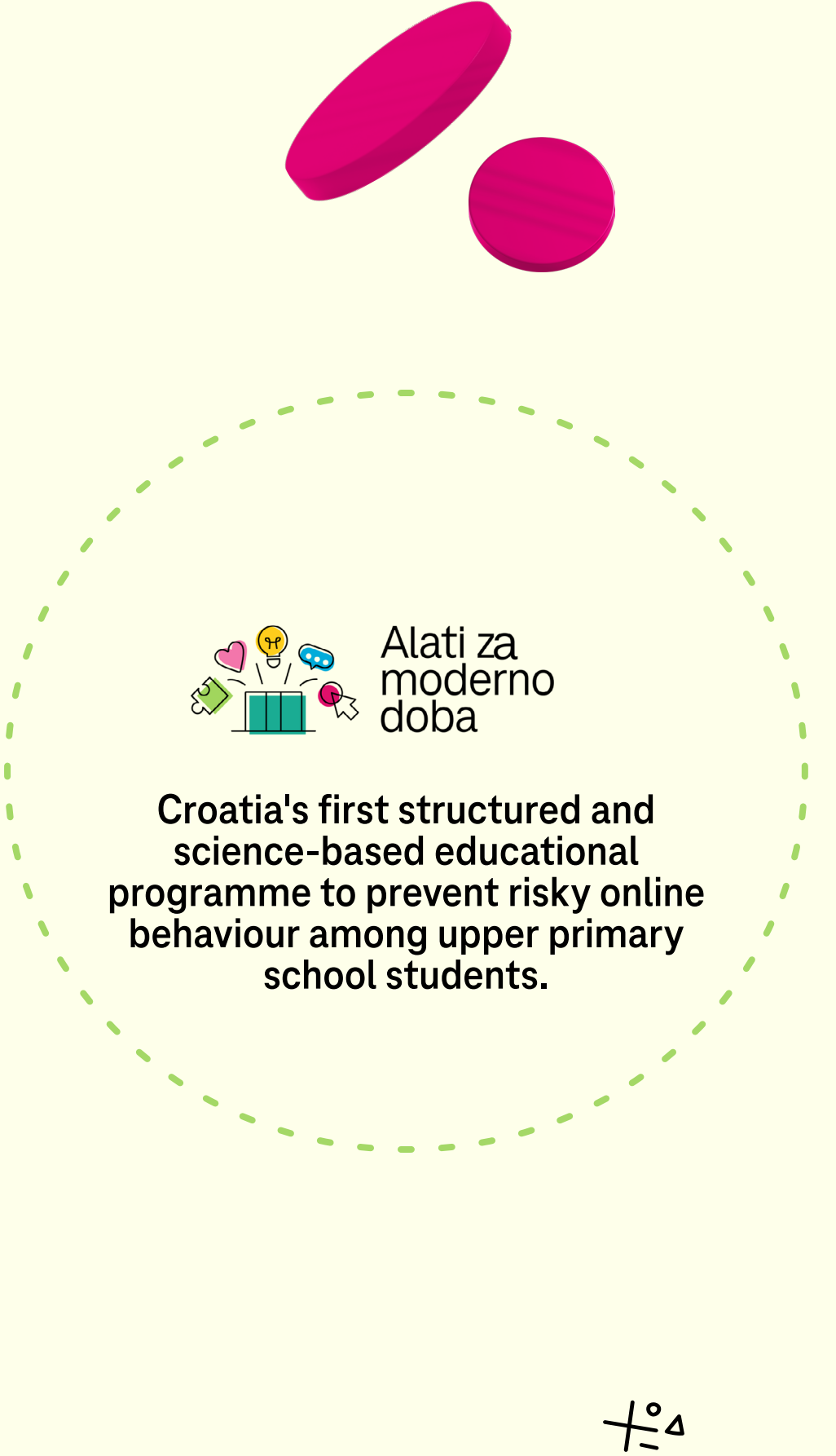
- During the programme implementation, all training groups were filled to 100% capacity, with interest exceeding the available capacity several times over (three times more interest and applications than the capacity of the training groups),
- The evaluation of the quality of the training delivered by facilitators resulted in an average score of 4.94 (on a scale of up to 5), exceeding the projected target value of 4.5.

The analysis of the programme shows its high effectiveness. After participating in the programme, as many as 50% of students reduced their excessive use of social media. Among those who had previously shown a tendency toward excessive video gaming, two-thirds reduced their gaming time by one to five hours per day.

Through a multi-component approach and several years of scientific evaluation, the "Tools for Modern Times" programme has proven to be a unique initiative that does not focus solely on the consequences of risky behaviours, but takes a primarily preventive approach, aiming to stop such behaviours from developing in the first place. In doing so, HT contributes to protecting the mental health of children and young people and lays the foundation for a more inclusive, safer and more responsible digital society.

The "Tools for Modern Times" programme has been recognised nationally and internationally as an example of excellence in corporate social responsibility and education. SABRE EMEA, one of the world's leading platforms for public relations, brand and reputation management, named "Tools for Modern Times" the best programme in the "Telecommunications" category, out of over 2,000 competing projects and campaigns. In addition, the Croatian Public Relations Association (HUOJ) awarded HT the Silver HUOJ Grand PRix Award for Corporate Social Responsibility. Within the DT Group, at the Team Awards competition that brings together the most successful initiatives from 55 countries, the programme won third place among 257 submitted projects.

These recognitions further confirm the programme's social relevance, as it directly contributes to the community's well-being and the safety of the youngest internet users.



DIGITAL INCLUSION

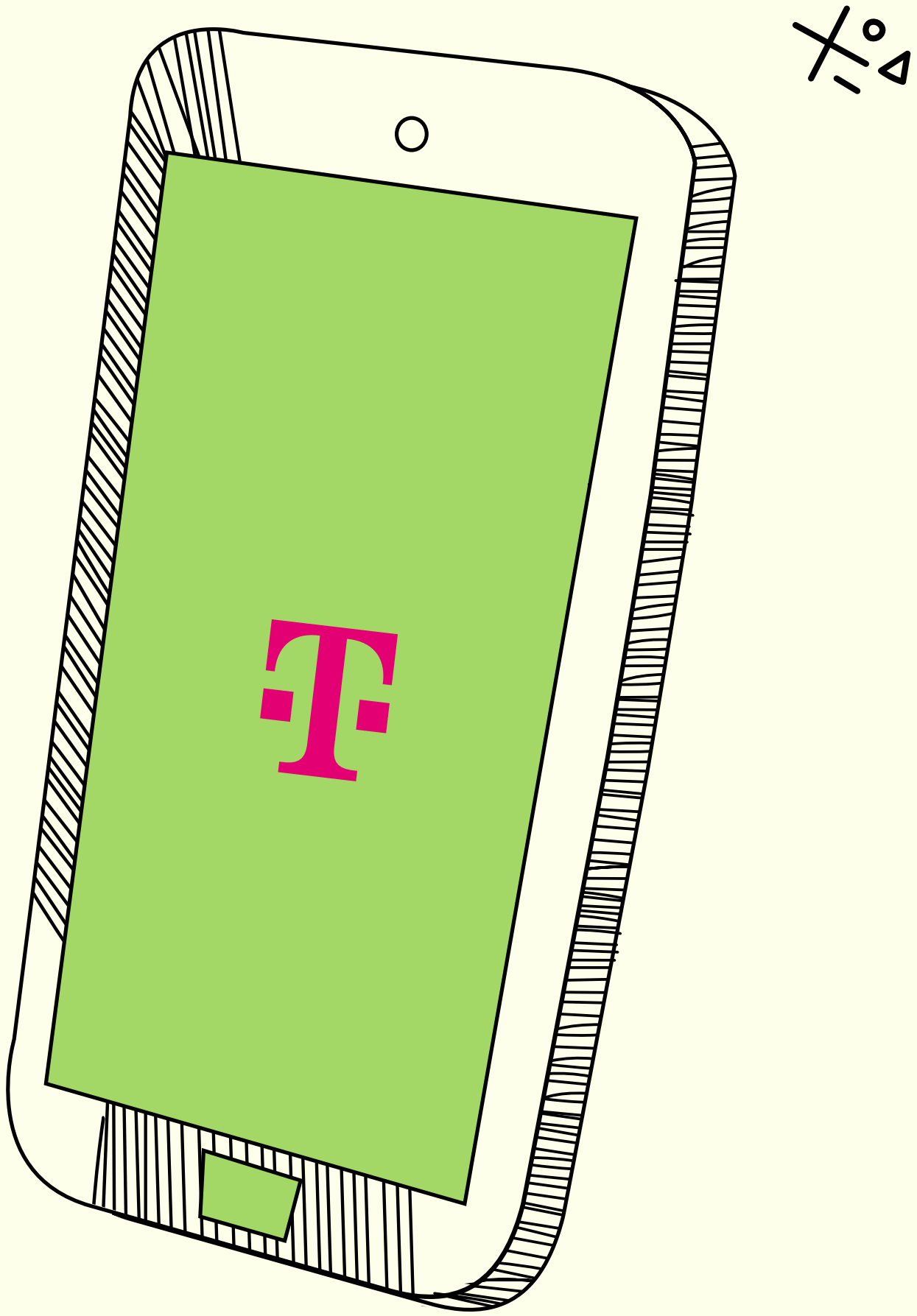
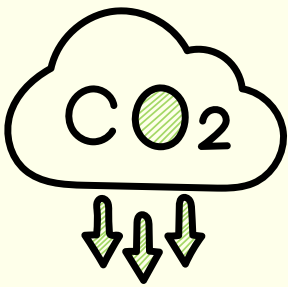
Generation NOW

In 2024, in partnership with the Institute for Youth Development and Innovation (IRIM), HT conducted the eighth generation of the Generation NOW programme with the topic “Smart Solutions for a Barrier-free World”. This programme aims to develop technology solutions to improve the quality of life of people with disabilities or difficulties. In 2024, more than 1,500 elementary and secondary school students were covered, and the total number of participants since the programme’s launch has been above 5,600. As many as 91 projects on how to implement technology to solve concrete challenges that people with disabilities face were submitted. This shows students’ commitment and creative contribution to this programme. It is expected that, by 2030, as many as 2.5 billion people globally will need at least one supporting technological solution. Among the solutions presented, notable examples include smart walking sticks for easier orientation of blind and visually impaired people, educational tools for children with developmental disabilities, communications devices for people on the autism spectrum, smart wheelchairs and digital solutions for people with limited mobility. In developing their solutions, students used Neuron, Arduino and Dasduino developer platforms and additional DFRobot components. All technical equipment was donated to schools included in the project, and HT provided free internet access for all participants. This enabled a smooth project implementation and digital inclusion of all schools, irrespective of their location or resources.



T Phone 2 and T Phone 2 Pro

High costs, such as those of 5G devices, remain a key barrier to accessing the benefits of connected technology. To tackle this challenge, in 2022, HT launched its branded product line to offer affordable devices to all, powered by a network of demonstrated superior performance. In 2024, HT introduced the next generation of the T smartphones in its offer: T Phone 2 and T Phone 2 Pro, with an even better price-to-performance ratio. The latest generation of T Phone 2 and T Phone Pro 2 is a significant leap forward in all technical aspects of the devices. The new devices represent an attractive package thanks to substantial improvements, including a powerful processor and larger memory, higher quality screens and cameras, and Dual-SIM and eSIM. As with the first T smartphone generation, the latest T Phone generation has also been designed to boost digital inclusion throughout Europe in the spirit of the “Connecting Your World” slogan. Along with affordable prices and performances, the new T smartphones now come in sustainable design to decrease CO₂ emissions and boost responsible resource use and recycling, and are offered in plastic-free packaging.



DIGITAL LITERACY

HT has been conducting and developing a series of programmes and initiatives offering a state-of-the-art training to people of all ages, ranging from elementary school students to the elderly. Thus, these groups have the opportunity to gain and develop the required digital skills and have access to the necessary equipment. HT's mission is to ensure that everyone has the same opportunity, is included in the digital society, and that no one is left behind. HT carefully monitors societal needs and demands, and designs various programmes and activities tailored to specific needs, thus increasing the number of people and organisations that benefit from HT's corporate social responsibility.

Generations Together

Within the national programme of enabling digital literacy of the elderly called "Generations Together", which has been continuously conducted since 2020, in 2024, HT organised 40 training workshops all over Croatia. In cooperation with the Zagreb Volunteer Centre, local citizens' associations and HT's volunteers, 350 people participated in the training organised in nine nursing homes for the elderly and disabled people (in Varaždin, Koprivnica, Čakovec, Dubrovnik, Korčula, Pelješac and Metković). The "Generations Together" programme is focused on boosting the digital competencies of the elderly to decrease the digital divide and foster an active inclusion of the elderly in modern society. The training included basic digital skills, such as using the internet, smartphones and tablets, and working on computers and portable devices. The participants gained concrete knowledge, such as how to make a video call via WhatsApp, which boosts connection with family and friends. Through continuous volunteer support, the "Generations Together" programme has systematically contributed to creating a society where the elderly remain active, connected and included in everyday life.

BOOMER

As a partner in the EU project BOOMER (Booming Digital Literacy Skills among Elderly Population), co-financed by the Erasmus+ programme, HT has also contributed to building a digitally literate society. This project aims to enhance digital literacy and promote digital inclusion of older people. The project was implemented from September 2022 to August 2024. Eight partners from five European countries (Belgium, Croatia, Italy, Germany and Spain) participated in this project. The research centre CREDO at the University of Dubrovnik coordinated the project. BOOMER aims to address the challenges of a fast digital transformation and bridge the intergenerational gap and social divides by educating and increasing the digital competencies of the elderly. Its education modules include basic digital skills, internet safety and safe communication, cooperation in the digital environment, personal finances management in the digital environment, responsible use of social networks and recognising and avoiding threats and misinformation on the internet. This project also resulted in developing an education platform tailored to the needs of the elderly – the Digital Boomer. Through its innovative approach, it offers a helping hand when it comes to enhancing the digital literacy of the older generation. Until today, more than 600 customers from Croatia and abroad have participated in in-person or online training within this project, with over 20 educational workshops held in 15 towns across Croatia in 2024.

Fairy tales in the digital world

As part of efforts to raise public awareness about IT security, Combis, in cooperation with the Center for Missing and Exploited Children Croatia, published the picture book "Hansel and Gretel" in 2024 - the fifth in the "Fairy Tales in the Digital World" series, which teaches children about online risks and dangers. The "Fairy Tales in the Digital World" picture book collection is part of a major educational campaign on online safety aimed at teaching younger age groups how to use the internet more safely and wisely. Each of the five books uniquely educates children about internet risks, online impersonation, and appropriate online behaviour. Through "Hansel and Gretel", the latest book in the series, young readers are introduced to the world of digital challenges that hide behind seemingly "sweet" offers and online impersonation.



COOPERATION WITH LOCAL COMMUNITIES

In today's unpredictable and dynamic world, companies' corporate social responsibility is becoming increasingly important alongside the traditional view of companies as the drivers of economic growth. Through supporting local initiatives, HT aims to enhance the quality of life within local communities and the society in which it operates. Through its involvement and active participation in community projects, HT addresses concrete social challenges, primarily focused on vulnerable groups. The collaboration between HT and local communities has led to tangible changes that promote social cohesion. At the same time, it enables HT to understand its operating environment better and build long-term and trust-based relationships.

Aiming to ease the sense of disconnection in an increasingly polarised world, HT launched its 2024 holiday campaign under the slogan "Connection Begins Where Barriers Disappear", grounded in the belief that unity can outweigh divisions in today's world by far. Within its 2024 Christmas campaign, HT continued its tradition of corporate philanthropy by supporting those in greatest need. After internal employee voting, five associations received donations totalling EUR 15,000: "Dječji dom Mestral" (Children's Home Maestral, Split), "SOS Dječje selo" (SOS Children's Village, Lekenik), "Novi Dan" association (New Day association, Osijek), "Nismo same" association (We Are Not Alone association, Zagreb) and "Vukovarski leptirići" (Vukovar Butterflies, Vukovar). This initiative is part of HT's broader strategic approach to promoting solidarity, inclusivity and connection.

Throughout 2024, the HT Group Volunteer Club carried out more than 25 field activities, involving over 250 employees who contributed nearly 1,000 volunteer hours to the community. Cooperation with the Volunteer Centre Zagreb within the "Generations Together" programme continued, and volunteer activities were further expanded through partnerships with numerous associations and institutions across Croatia.

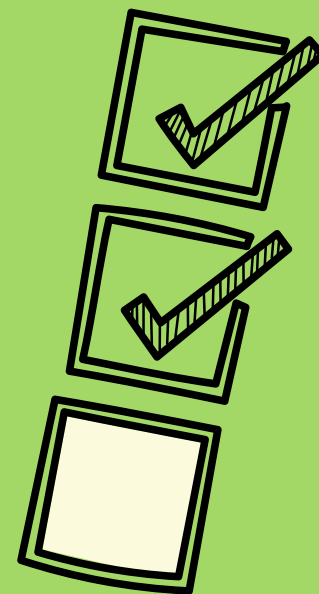
Six humanitarian initiatives were carried out in cooperation with the "Mali Zmaj" (Little Dragon) association, ranging from packing aid packages at their premises in Zagreb to an internal drive for collecting gifts for girls from the A. G. Matoš children's home and for Easter packages. HT's volunteers regularly visited the Ozana Association, which supports persons with disabilities, where they took part in renovating indoor and outdoor premises, planting greenery and organising creative workshops. They also supported the Alzheimer's awareness initiative by packaging crocheted forget-me-nots, participating in a symbolic walk with the association's beneficiaries, and enabling the sale of their handmade products at HT's business premises.

Particular attention was devoted to the care and welfare of animals. Volunteers visited animal shelters in Zagreb, Rijeka, Split and Osijek, where they took part in cleaning, donated food, blankets and supplies, and assisted in the daily care of abandoned animals. In cooperation with the "Krijesnica" (Firefly) association, an apartment for parents was renovated, and more than 80 books were collected for the Psychiatric Hospital for Children and Adolescents in Zagreb. In 2023 and 2024, several voluntary blood donation drives were organised with the Red Cross, involving more than 450 colleagues at HT. In November, HT joined a reforestation initiative cooperating with Hrvatske šume (Croatian Forests company), planting 1,000 pedunculate oak saplings. During the holiday season, traditional support was again extended to the Maestral Children's Home in Split by collecting food, toys and supplies based on children's needs.

As part of various humanitarian initiatives, HT also provided free telephone lines for organisations supporting the most vulnerable groups, such as the Ana Rukavina Foundation, the Paralympic Foundation, the Autonomous Women's House and "Hrabri telefon" (the Brave Phone) helpline, thereby enhancing their public visibility and accessibility.



By supporting local initiatives, HT aims to contribute to the quality of life of the communities and society in which it operates



*SECURE DIGITAL
ENVIRONMENT*

DATA SECURITY AND PROTECTION

Digital transformation creates an environment where more and more activities occur in the digital space, bringing significant challenges in the areas of cybersecurity, information security and data protection. In the business world, security means protecting a company’s most valuable assets – its people, tangible and intangible property – through robust systems and processes, as well as by fostering a security-focused corporate culture. Adequate security, data and information protection, data integrity, availability and confidentiality are of utmost importance and are ensured by implementing numerous security measures. Applying the HT Group Security Policy ensures high security standards for customers, employees, services, products, assets and business activities.

Alignment with the new legislative framework

In 2024, some key regulations on cybersecurity entered into force to keep boosting security standards and ensure compliance with the European Union’s regulatory framework. The Cybersecurity Act thus entered into force on 15 February, and the Cybersecurity Regulation entered into force on 30 November 2024. In addition, the Act on the Implementation of Regulation (EU) 2022/2554 on Digital Operational Resilience for the Financial Sector (DORA) was introduced, setting new requirements for the security and resilience of digital systems. Although operational activities related to this legislative framework were mainly launched at the beginning of 2025, the preparation for these activities, including updating internal policies and procedures to ensure HT Group’s compliance, was carried out during 2024.

Business continuity systems and information security systems

The backbone of HT’s security, data and information protection mechanisms consists of business continuity management systems in accordance with the ISO 22301:2019 standard, which ensures uninterrupted

business operations even in the event of adverse incidents, and information security management systems (ISMS – ISO/IEC 27001:2017), which include requirements for assessing and treating information security risks tailored to the organisational standards under which HT has been operating since 2009. Within the framework of the ISO/IEC 27001:2017 information security management system, the business units responsible for security continuously monitor and assess the state of security within their areas of responsibility, both at the operational and strategic levels. In 2024, the Information Security Management System (ISMS) was recertified, thereby renewing the ISO/IEC 27001 certification for a new cycle. The audit confirmed the effectiveness of the existing system and the organisation’s readiness to face new security challenges.

Security and privacy protection across all products and systems

In 2024, the PSA (Privacy and Security Assessment) procedure was updated – a systematic process that ensures compliance with the highest technical and organisational requirements for security, data protection and privacy. The PSA procedure ensures high and consistent levels of security across all products and systems and applies appropriate technical and organisational measures as standardised components of the development process. Every system or project implemented within HT undergoes the PSA procedure, during which the system is described and classified based on the sensitivity and volume of personal data. The PSA ensures that all relevant systems meet the security and regulatory standards of the HT Group and receive approval from security and privacy experts before being released into production.

Applying the PSA procedure ensures a “privacy by design” and “security by design” approach, meaning that all relevant personal data protection and security requirements are embedded in HT’s products and services.

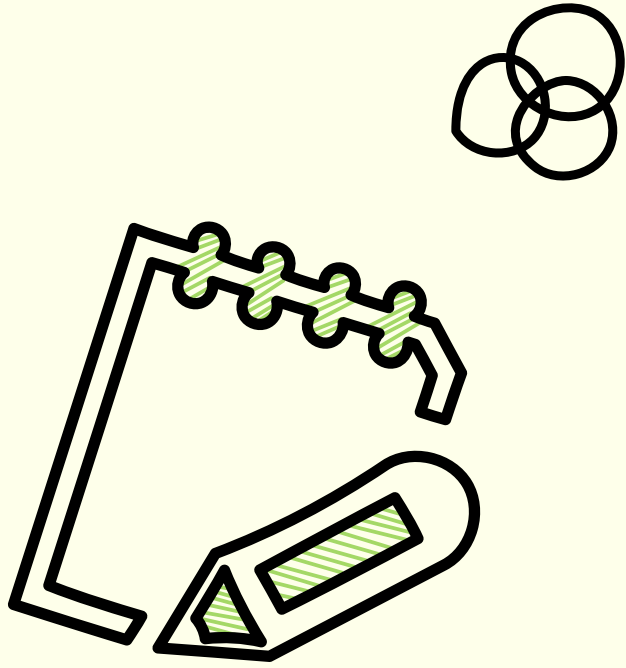
The requirements of the PSA procedure are aligned with the latest industry standards and best practices and specifically define technical and organisational measures/controls, depending on the type of data being processed and the technologies used to implement the system or project. This additionally ensures a high level of data protection throughout all phases of business processes.

Employee training

To effectively apply high security standards and protect people, assets and personal data, all employees must maintain a strong security awareness and adhere to security standards that are a prerequisite for achieving this goal. To raise security awareness and familiarise employees with security policies and procedures, mandatory training sessions are conducted for all employees. Employees complete online training and have a brochure on cyber, information and physical security at their disposal. In addition to mandatory internal training, supplementary programmes were implemented to enhance security awareness even more. Educational materials are regularly published internally, including the “Cyber AwareNessi” programme – educational workbooks and colouring books designed especially for the youngest audience. These materials cover a range of topics related to cybersecurity, physical security and best practices and many of them are publicly available on HT’s web site.

HT also conducts Security Parkour interactive training sessions on cyber threats, physical security, information classification, security policies and social engineering, providing employees with engaging and dynamic learning experiences. The topics covered by Security Parkour are those that people may encounter in everyday life.

HT actively participates in working groups that introduce new standards, regulations and policies at the EU level, such as the Cybersecurity Working Group of HUP, the “Information Security” and “CERT/SOC” working groups of the ETIS organisation, as well as other working groups in the field of cybersecurity and information security within the DT Group.



DATA PRIVACY

In an increasingly connected and digitalised world, data privacy is the cornerstone of the trust customers place in an organisation. Given the growing volume of data processed in everyday operations, safeguarding privacy is a regulatory obligation and a key element of responsible and sustainable business operations. Rising demands for transparency and growing customer expectations regarding how their data is collected, processed and stored additionally highlight the need for clearly defined internal rules, security standards and continuous employee training. Privacy protection is not a one-off activity but a continuous process integrated into developing products, systems and services. Such a process demonstrates the organisation's commitment to ethical and lawful data handling.

In 2024, HT updated its Binding Corporate Rules for Privacy (BCRP), further strengthening its personal data protection framework across the organisation. As several new products and services were launched, an initial privacy setup was developed for each case, including the definition of privacy rules and customer information in line with regulatory requirements and the PSA procedure. All systems, processes and supporting documentation are regularly reviewed, and HT's infrastructure is subject to ongoing compliance checks within the General Data Protection Regulation (GDPR). The review and alignment of all critical systems with GDPR provisions and strengthening employee awareness of the importance of personal data protection were key objectives concerning data privacy in 2024. A series of internal audits were also carried out, covering areas such as cybersecurity, business compliance, corporate security and risk management.



Customers privacy protection

To identify risks to customer privacy, particularly when there is a potentially high risk concerning the rights and freedoms of individuals, HT conducts a Privacy Impact Assessment (PIA) and a Data Protection Impact Assessment (DPIA). Following the initial risk identification, measures are considered to eliminate or at least significantly mitigate the risk. The risks are documented in the appropriate records, which list the measures for risk elimination or mitigation.

Particular attention is given to data access control and employees are trained about the importance of personal data protection, fostering a culture of responsibility and security in day-to-day operations. Employees are granted access only to the data necessary to perform their work tasks, and all access to users' personal data is logged. The criticality of systems was determined based on the volume and sensitivity of users' personal data processed within them, and all critical systems were included. To support continuous competence development, all employees must complete personal data protection training at least once every two years. Employees receive a certificate upon successful completion of the training. In addition to mandatory training, role-specific training sessions are also conducted.

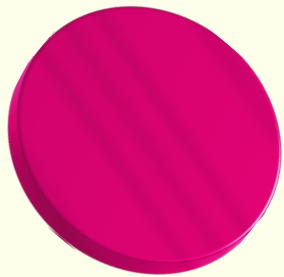
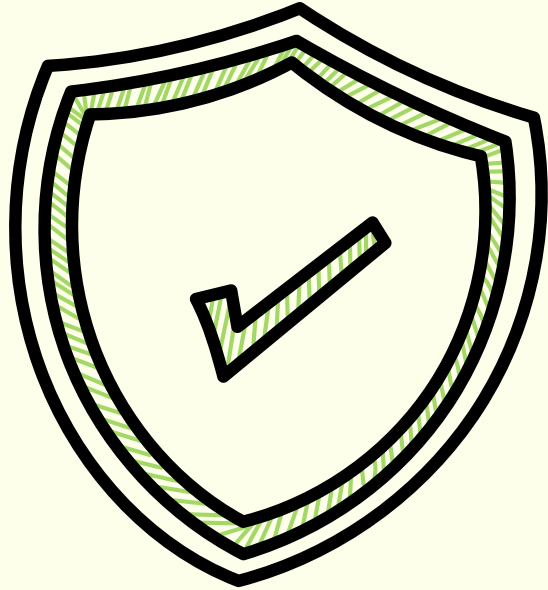
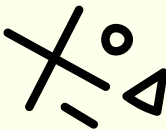
Furthermore, it is ensured that marketing campaigns are carried out exclusively based on validly obtained customer consents, which are verified before each activity. The "Do Not Call" registry, which contains info on which customers have expressed a wish not to be included in marketing activities, is also being checked.

HT has established an advanced system to ensure data subject rights are respected. This is done by providing a dedicated contact address for customers (osobni.podaci@t.ht.hr) for any questions or complaints that they may have. Specific data subject rights under the GDPR can also be exercised through other HT channels, such as HT's website www.hrvatskitelekom.hr and at the points of sale.

In 2024, 26 customer requests for access to their personal data were received, per Article 15 of the GDPR.

195 complaints/requests related to end-user personal data were recorded. Following user complaints, the Croatian Personal Data Protection Agency (AZOP) conducted 18 inspections. All complaints/requests were resolved promptly, with no further actions or additional requests from the users or AZOP. In 2024, there were no financial losses or legal proceedings related to complaints/requests concerning the processing of personal data. AZOP established a personal data breach in one case, but no monetary penalty was imposed.

More information on HT's privacy practices is available under the "ESRS S4 – Consumers and end-users" chapter of the [HT Group's Annual Report for 2024](#).



BEST CUSTOMER EXPERIENCE

In the digital age, where communication and technology are essential parts of everyday life, customers expect functionality, service quality, meaningful interaction, simplicity in communication with the brand and the highest level of efficiency in resolving problems. HT aims to connect everyone in Croatia and enable customers to take full advantage of modern technology. To achieve this, HT invests significant resources and attention in continuously improving its customer experience – from the most critical elements such as network speed and reliability, accessible, efficient customer support – to delivering innovative services, intuitive online platforms and apps as well as personalised solutions.

Ongoing customer experience improvement

To successfully create an outstanding customer experience, it is essential to keep closely tracking customer needs. HT regularly conducts customer experience and customer satisfaction surveys and implements programmes and projects to improve its customer experience.

In 2024, all customer experience improvement activities were intensified through the following measures:

- Continuously surveying customer experience, analysing its results and reporting on customer experience outcomes for various services across the Company,
- ongoing training for all HT Group employees on the “Customer Centricity” and “Voice of our Customers” (VoC) programmes,
- continuous workshops focused on survey results, in-depth analyses results, potential areas for improvement and measures to enhance the customer experience, and

- regular updates on the “Customer Centricity” programme activities via newsletters and articles on the intranet,
- through the campaign “Sincerely. Together”.

The “Sincerely. Together” campaign enabled customers to continuously receive transparent information about improvements based on their comments and suggestions. The campaign resulted in greater customer acceptance, visibility and engagement.

Customer experience improvement programmes and projects have led to a continuous upward trend in satisfaction among B2C and B2B customers over the past three years. HT’s engagement and achievements in customer experience have also been recognised at the DT Europe level. At the DT Top Leadership Team meeting, HT was awarded for its customer experience. Due to its leading position in the B2C and B2B segments, HT was recognised across the entire DT Group.

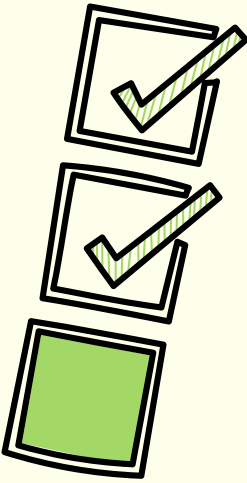
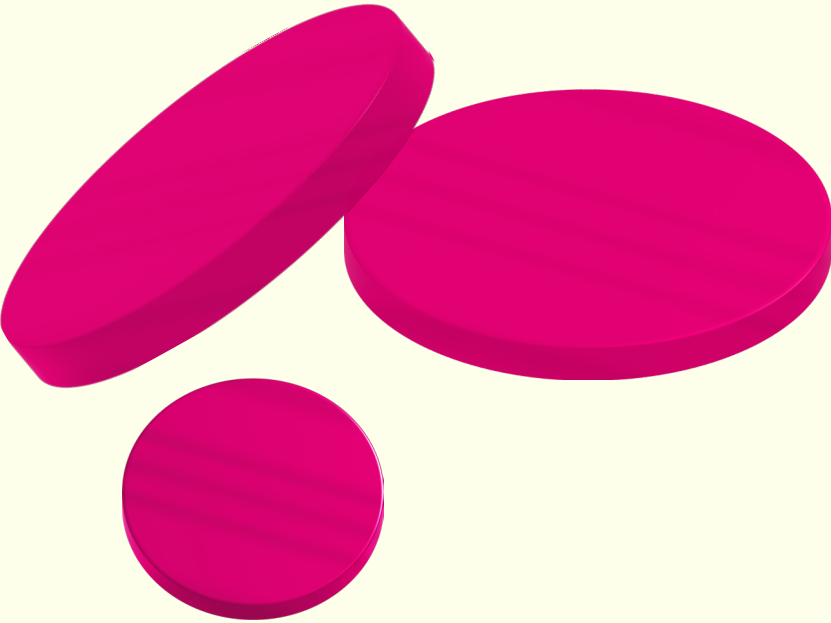
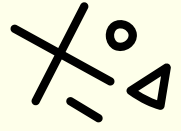
More information on HT’s practices on ensuring the best customer experience is available under the chapter “ESRS S4 – Consumers and end-users” of the [HT Group's Annual Report for 2024](#).

Efficient handling of complaints

Customer experience is regulated, and HT adheres to the highest standards in managing its customer experience. Throughout 2024, HT continued to implement programmes aimed at reducing the number of customer complaints through carefully planned actions, implemented daily to stay attuned to customer needs. All complaints are resolved in accordance with the law and with

a tailored-made approach, focusing on the quality of problem resolving and increasing customer satisfaction. Key performance indicators, such as service level and average complaint resolution time, are closely analysed to ensure continuous improvement. Through root-cause elimination initiatives, HT identifies the underlying causes of issues and takes appropriate steps to resolve them. Monitoring the legally defined complaint resolution deadlines is essential to ensuring timely and efficient service for our customers. Additionally, customer surveys are conducted to assess their satisfaction with the problem-solving process. The quality of complaint resolution remains at a very high level, as confirmed by the latest report on customer disputes in electronic communications for 2024 by the Croatian Regulatory Authority for Network Industries (HAKOM). This report shows that in over 70% of cases, HAKOM ruled to uphold HT’s decisions. This report highlights HT as the operator with the best ratio of positive to negative HAKOM decisions concerning customer complaints, confirming the correctness of the decisions made in the second-instance proceedings. Across all three levels (first instance, second instance and HAKOM ruling), HT has the lowest complaints per 10,000 customers among all operators.

More information on HT’s mechanisms for expressing concerns is available under the chapter “ESRS S4 – Consumers and end-users” of the [HT Group's Annual Report for 2024](#).

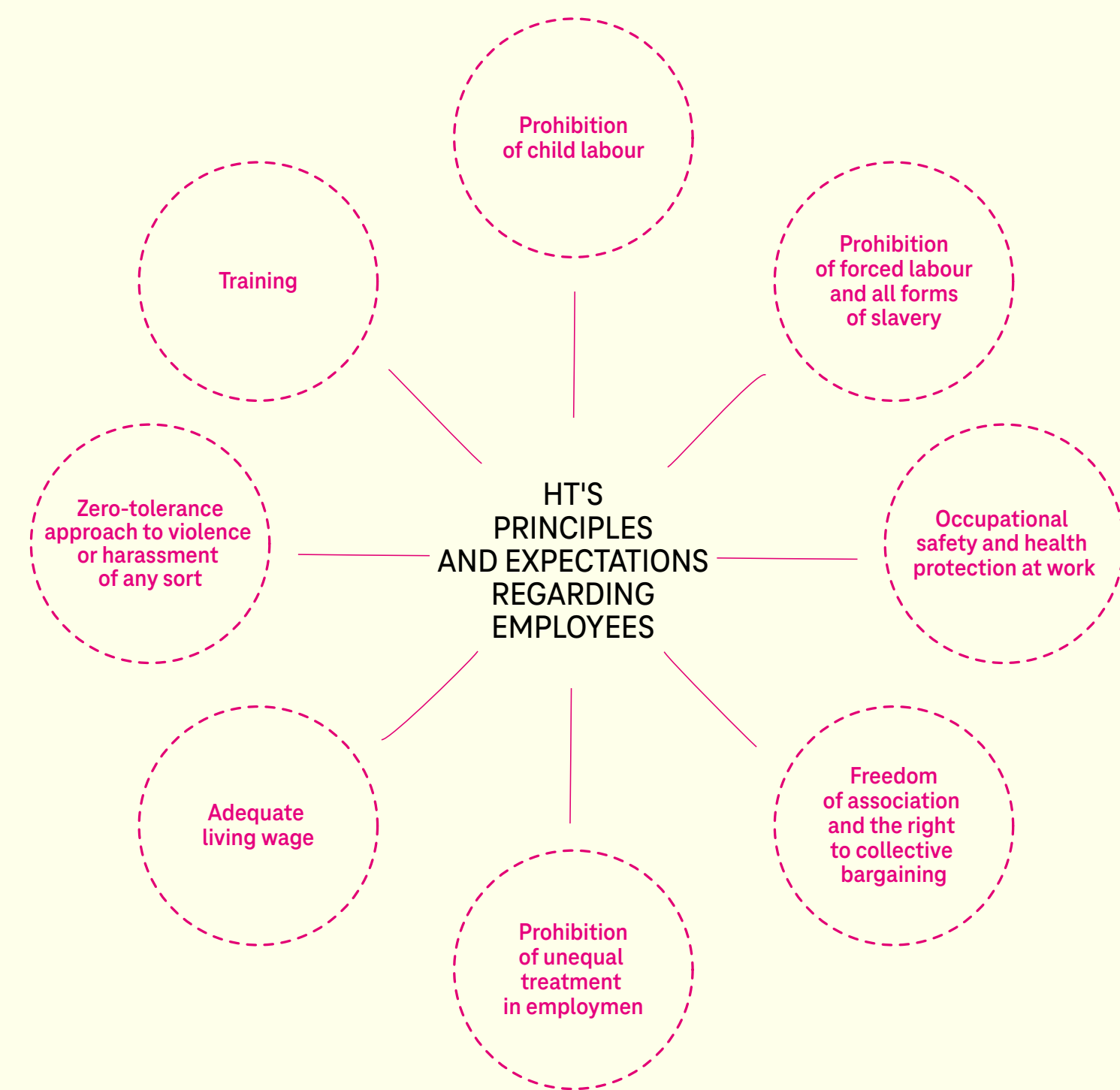




*THE MOST
DESIRABLE EMPLOYER*

STIMULATING AND DIVERSE BUSINESS ENVIRONMENT

HT is committed to creating a working environment where everyone can realise their full potential and is provided with equal opportunities. Such an environment harbours inclusiveness and intolerance of any form of discrimination. We acknowledge our commitment to this goal by implementing the HT Group’s Guiding Principles, a transparent recruitment and promotion process, working dynamics that enable flexible working hours, and various action protocols ensuring a high level of workers’ rights. HT recognises the importance of diversity in the corporate environment as a key value. Therefore, the Company’s strategic goal is to strive to increase diversity at all organisational levels.



More information on HT's diversity practices is available under the “ESRS S1 – Own workforce” chapter of the [HT Group's Annual Report for 2024](#).

Organisational culture

HT sees organisational culture as a key factor in driving organisational success, employee engagement and development. It directly influences employee motivation, satisfaction and productivity, while fostering a sense of belonging, rooted in shared values and organisational culture. In today’s dynamic and competitive business environment, a stimulating workplace culture helps attract and retain talent while encouraging collaboration, innovation and ethical behaviour. In short, a strong, supportive and positive culture has become a strategic advantage in modern business landscape. That is why HT implements a range of initiatives to encourage and reward the desired behaviours. HT educates employees on teamwork, collaboration and empathy, raising awareness of unconscious bias and fostering personal growth to enhance cooperation with others.

In 2024, HT advanced and strengthened its organisational culture through a series of initiatives that were implemented and recognised across the organisation:

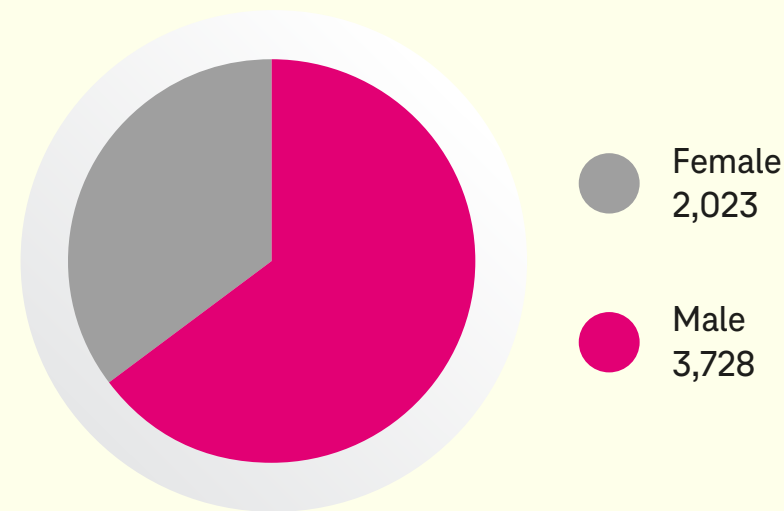
- Employee performance is monitored and measured through a set of behaviours described in the Guiding Principles. In this way, building and promoting the desired culture becomes an integral part of the employee evaluation process and a lever for rewards and career development,
- All developmental programmes at HT include the development of a skill set based on HT’s value system – the Guiding Principles,
- Seven top-rated projects that promote key Company values – teamwork, cross-functional collaboration, breaking down silos and the achievement of the Company’s goals – were recognised through the “Team Award” initiative,
- The “CX Stars” initiative identified and rewarded 40 employees distinguished by their strong customer orientation and high levels of expertise in customer service,
- HT’s Guiding Principles day was marked by the “Living Culture Day” event, where employees had the opportunity to share their views on HT’s Guiding Principles,
- The “Pride. Croatian Telecom.” campaign was named the world’s best PR campaign in the “Employee Engagement” category at the 2024 Platinum Awards organised by the PRCA. The programme celebrates and highlights the contributions of employees who help shape the organisational culture. HT’s campaign was recognised as an example of excellence among entries from 82 countries,
- The “Diversity, Equity and Inclusion” portal was updated. Employees can find comprehensive information on initiatives that promote an inclusive and diverse work environment and access resources to learn about unconscious bias and the importance of fostering workplace diversity.

STIMULATING AND DIVERSE BUSINESS ENVIRONMENT

Diversity and equal opportunities at all levels

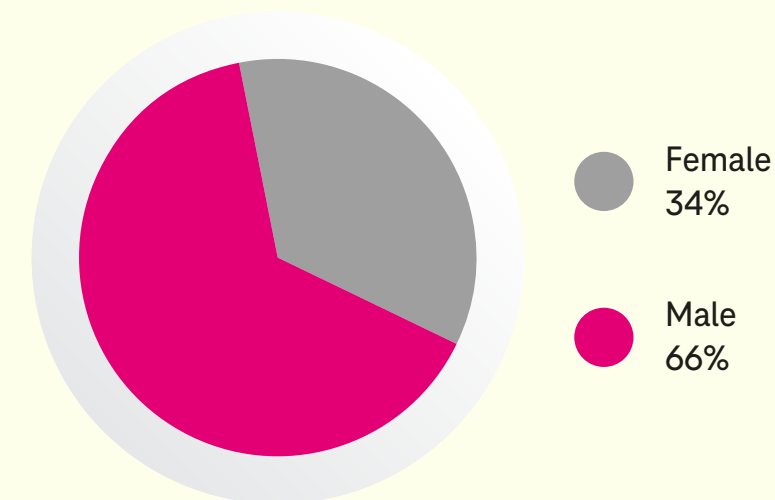
To ensure a diverse and inclusive environment is created in practice, HT pays close attention to diversity at all organisational levels. Currently, the HT Group employs people of all age groups and diverse professional backgrounds, including foreign nationals. In terms of gender representation, more than 2,000 women are employed, accounting for 35% of the total workforce.

Number of employees per gender in HT Group



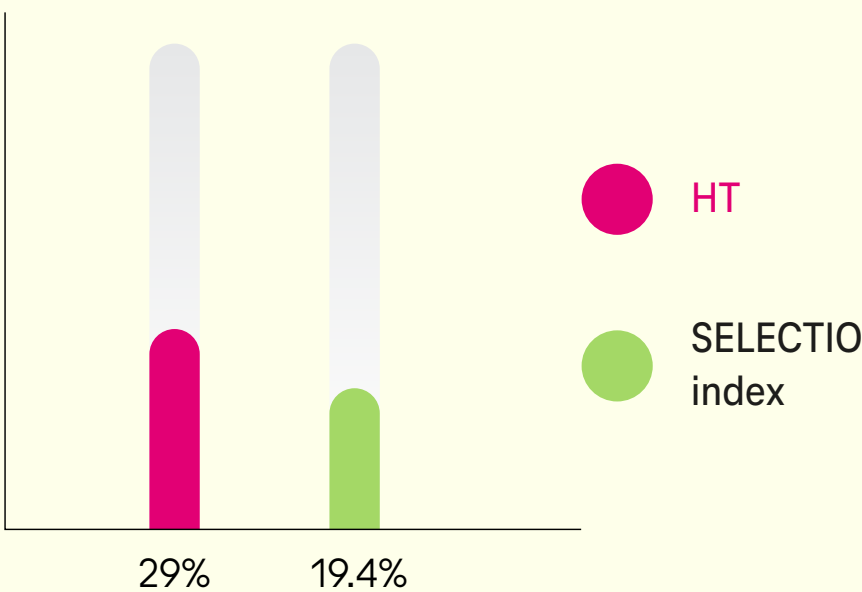
One of the goals of HT's Sustainability strategy is to maintain the percentage of women in management positions. In 2024, this percentage for the HT Group was 34%, and it was lower than in the preceding year due to the transfer of the company HT Services to the HT Group.

Gender distribution of managers in leading positions, without the Management Board



The gender distribution of women on the Management Board is 29%, and is above the SELECTIO women index level. SELECTIO is an index used to measure the proportion of women on the Management Boards of the CROBEX index companies for 20 years. The SELECTIO women index for 2024 was 19.4%.

Percentage of women in HT's Management Board

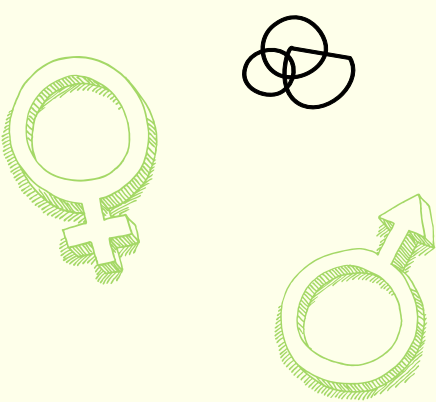
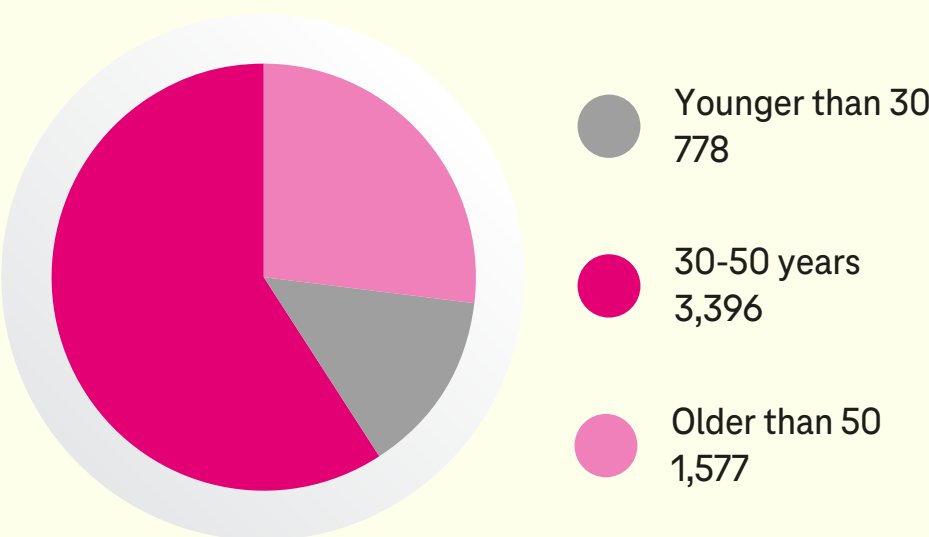


Additionally, HT demonstrates equality through equal pay for equal work for all employees regardless of gender, political, ethnic, religious or any other diversity. Job positions at HT are systematised and categorised into corresponding pay grades, based on the complexity of the tasks pertaining to these job positions. In 2024, the unadjusted gender pay gap in the HT Group was 3%, which is considerably below both the national which is 11% and the EU average which is 13%. HT's practices in ensuring gender pay equality are evidenced by the Equal Pay Champion certificate that was awarded to HT.



Besides gender equality, HT continuously monitors its employee distribution per age group and undertakes efforts to create opportunities for its young and more experienced employees.

Employee distribution per age groups in HT Group



Gender pay gap in the HT Group = 3%

The gender pay gap in Croatia stands at 11%, while the average pay gap across the European Union is 13%.

EMPLOYEE DEVELOPMENT AND TALENT ATTRACTION



The key to HT's success lies in the satisfaction and motivation of employees. Therefore, HT cultivates relationships with its employees based on mutual respect and responsibility, which contributes to excellent results in the long term. HT continuously listens to its employees' opinions and considers them. Employee needs are closely monitored to ensure high employee engagement, which positively reflects on HT's status as a highly desirable employer.

Data on HT's employee satisfaction and labour rights are regularly and actively collected through employee surveys, which verify the contribution to equal treatment and opportunities for all. The survey results for 2024 have shown that the satisfaction level is stable, with minor oscillations. Concerning diversity and non-discrimination, HT has been continuously achieving high scores. Most employees believe that, at HT, everybody has equal employment and career development opportunities, regardless of age, gender, gender identity, sexual orientation, physical and mental abilities, nationality, social and ethnic origin, political beliefs, religion, and world view. More than 90% of employees believe that HT provides a safe working environment for everyone, where inappropriate behaviour is unacceptable, irrespective of the categories above.

For its excellence in human resources management and the continuous improvement of work processes, HT received the Employer Partner certificate for the tenth time, awarded by the SELECTIO Group. For the third consecutive year, HT was also recognised with the Above and Beyond certificate, granted to the top 10% of employers in Croatia in human resource management.



When it comes to attracting new talent and retaining high-performing individuals motivated to go the extra mile, providing a stimulating and supportive work environment is essential. The Employer Brand Awards Adria confirmed HT's excellence in this area, which recognises the best HR initiatives for attracting and retaining talent.



Equal opportunities are key factors contributing to employee satisfaction and engagement. For this reason, HT strives to provide its people with a clear and accessible career development path. The achievement of this goal is evidenced by the following strong results: in 2024, 3,000 employees advanced along their career paths, as many as 72% of employees had a salary increase, and an equal number of men and women achieved either a promotion or a salary increase.



Employee education

The opportunity for employee development and the continuous sense of progression that HT strives to embed in the work environment largely depend on the availability of learning opportunities. In 2024, 85% of HT employees participated in training, with an average of 40 hours of learning per employee.

Management (training hours)		Employees (training hours)	
Average	Total	Average	Total
♂ 35	♂ 2,860	♂ 41	♂ 84,950
♀ 38	♀ 2,600	♀ 43	♀ 72,300

In 2024, 15 comprehensive development programmes were implemented, involving over 2,000 employees and confirming HT's ongoing commitment to strengthening competencies and maintaining a culture of lifelong learning and personal development.



EMPLOYEE DEVELOPMENT AND TALENT ATTRACTION

Below is a brief overview of development programmes implemented at HT in 2024:

- 3 programmes for managers and team leaders (including 500 managers and team leaders),
- 2 programmes supporting career development, which are part of the Career Path process,
- 5 programmes for the development of specific expert competences,
- More than 2,500 employees participated in individual internal and external short-term training sessions,
- An internal online learning system is available to all employees,
- A 30% increase in access to online learning systems was recorded.

Top-performing employees with high potential attended the following programmes:

Boosting High Potential and Grow Beyond programme

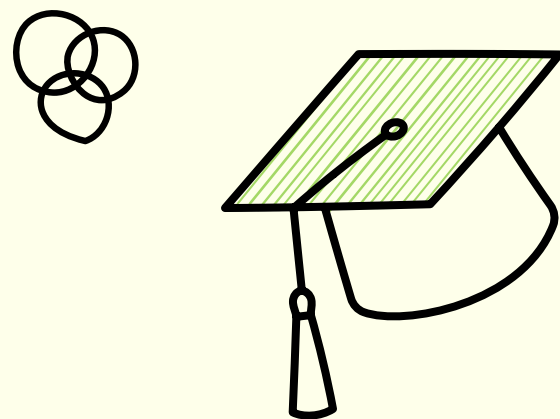
These programmes cover three areas of development – Leading Self, Leading Others, and Leading Business. The topics employees select are aligned with the predefined future skills already established in their development plans.

Compass

Training is designed to educate technical staff about various HT’s services and products, and to develop their technical and interpersonal skills. The training programme is implemented in cooperation with internal trainers and external providers, with 300 employees participating in the training.

Back2Core

This development programme covers engineering and information technology, tailored to developing personal effectiveness skills. The programme’s first phase included training for managers and team leaders in negotiation, presentation and finance skills. The development programme for 2024 and 2025 includes engineers who may optionally undertake training in interpersonal relations, presentation skills and negotiation skills. A total of 150 employees participated in the first and second phases of the programme.



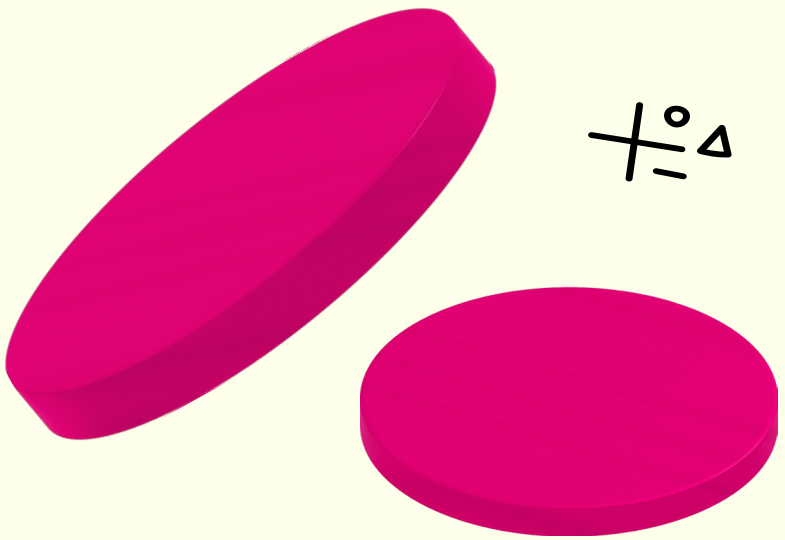
Artificial intelligence (AI)

The training initiatives to date have focused on raising awareness of the possibilities of artificial intelligence and developing prompt engineering skills, for which HT’s internal AI trainers have been educated. In the next phase, HT will launch an AI academy in collaboration with the American company Section, designed for 500 employees and bringing together renowned experts from OpenAI and other leading companies. The programme aims to integrate AI tools into specific business functions, emphasising practical application. An assessment of employees’ knowledge and skills in AI is currently underway, and the results will be used to tailor the academy’s content and define further activities.

The internal portal “Love AI – VolimAI” consolidates all in-house activities related to AI awareness and skills development. A dedicated AI section on the intranet allows employees to write, suggest training topics or watch AI-related podcasts. This project was awarded the HUOJ Silver Grand PRix for internal communication by the Croatian Public Relations Association (HUOJ).



HR Meetups is an initiative through which HT supports cultural transformation by promoting the concept of taking personal responsibility for one’s development and encouraging employee engagement. The topics focus on career management, personal development, and the opportunities HT offers to support individual growth. All employees were invited to HR Meetup events, and approximately 400 attended.



EMPLOYEE HEALTH, SAFETY AND WELL-BEING

The key to a productive employee lies in their health. The HT Group recognises the importance of its employees’ physical and mental well-being and the connection between well-being, individual productivity, and results achievement. Health and safety at work programmes within the HT Group lead to a sustainable, positive impact on employee health.

More information on HT's health and safety practices is available under the “ESRS S1 – Own workforce” chapter of the [HT Group's Annual Report for 2024](#).

Health and safety of employees

The occupational health and safety system covers all HT employees. After successfully participating in the national “Living Healthy” programme run by the Ministry of Health and the Croatian Institute of Public Health, HT was awarded the “Health-Friendly Company” recognition. Besides a proven contribution to environmental protection, biodiversity conservation and the preservation of natural resources, the “Health-Friendly Company” recognition confirms HT’s strong performance, practices and activities aimed at promoting healthy nutrition, physical activity and physical and mental well-being.



In 2024, numerous activities were carried out at HT to promote healthy lifestyle habits, disease prevention, and raise awareness of the importance of mental and physical well-being. Particular emphasis was placed on proactive measures ensuring employees access quality healthcare, education, and active participation in initiatives that contribute to their well-being. In September 2024, HT received recognition for its approach to employee care. HT was awarded the prestigious “Future Resilience” recognition, which is granted to organisations that systematically foster employee resilience and well-being through sustainable, inclusive and innovative practices.



In 2024, 60% of employees participated in various health initiatives, such as the “Health Month” – a project that included more than 20 different health-related activities, ranging from expert lectures, public health campaigns, challenges and competitions to organised workouts and health indicator assessments. More than 800 employees actively participated in the Health Month activities, further confirming the importance of a comprehensive approach to health in the workplace.

Activities that marked the “Living Healthy” project within the Health Month included:

- The “Motivate a Colleague to Exercise and Collect Benefits” challenge – track and collect kilometres with the chance to win valuable prizes,
- “Health Sites” and health screenings organised at HT Group locations in Zagreb, Split, Rijeka and Osijek.
- Raising awareness of the importance of prevention and occupational health and safety.

In 2024, the HT Group further enhanced its supplementary health insurance package, enabling employees to access a broader range of specialist examinations in private clinics and practices at no additional cost. In addition to regular medical check-ups, numerous additional screenings are now available, contributing to early diagnosis and the preservation of health.

Additional support for HT Group employees and their families is provided through the Friend (“Prijatelj”) Foundation. In recent years, the Foundation has awarded several financial grants to employees and their close family members facing health challenges, life difficulties, consequences of natural disasters and other extraordinary circumstances.

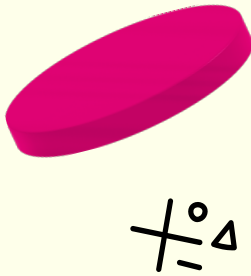
As part of a comprehensive approach to employee care, numerous training sessions in the field of occupational health and safety were conducted, including:

- Training for safe working practices, evacuation and rescue, and fire extinguishing,
- First aid training and the use of automated external defibrillators,
- Training sessions and campaigns on mental and physical health.

In 2024, 33 non-fatal injuries were recorded at HT Group.

Health and safety indicators

	Number of fatalities	Number of injuries	Lost Time to Injury Rate (LTIR)	Number of days lost
In the working process	0	24	2.45	1,067
Outside of the working process	0	9	0.92	280.5
Injuries at work total	0	33	3.37	1,347.5



EMPLOYEE HEALTH, SAFETY AND WELL-BEING

Work-life balance

HT strives to foster a culture that recognises the importance of balancing professional responsibilities and private life. Due to the awareness that employee satisfaction largely depends on the ability to spend quality time with family, more than 40 activities aimed at strengthening family bonds and supporting parenting were carried out in 2024.

One of the most joyful initiatives was Kids Day, which was dedicated to the young. On this day, employees' children could peek into their parents' world, participate in interactive workshops, and experience the work environment through play and learning. Both the children and parents met the event with great enthusiasm.

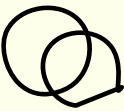
To help ensure a stress-free first day of school, HT once again granted a day off to parents of first-grade pupils, recognising the importance of being present at key moments in a child's development.

As part of the employee support programme, a workshop on children's emotional development was also held, offering valuable guidance to employees in understanding and responding to the emotional needs of their youngest family members.

As part of employee well-being initiatives, training sessions were held in two thematic modules: "Stress Awareness and Emotional Intelligence" and "Parenting and Child Rearing." The training sessions attracted significant interest, with 359 employees participating, highlighting the importance of supporting employees in personal and professional challenges.

Community and inclusion through sports and social activities

In 2024, as many as 60% of employees participated in sports activities that HT organised, such as the HT Group Olympics, B2B Run and Multisport. In 2024, the traditional HT Group Olympics saw a record number of participants. In addition to various sporting competitions, the event was further enriched by introducing Paralympic disciplines for the first time, with participation from employees with disabilities.

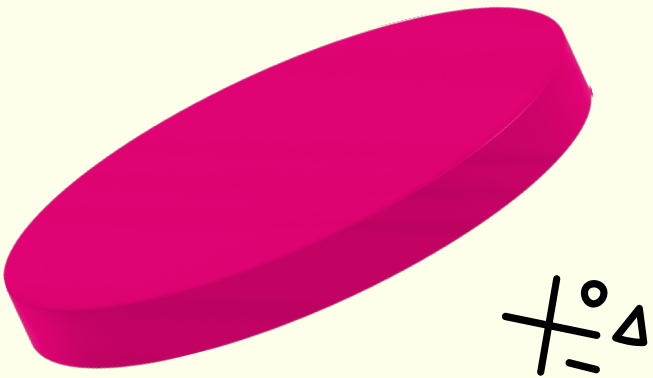


As part of the programme focused on strengthening interpersonal relations and personal development, a series of educational activities was also organised:

- A football pub quiz, combining fun with teamwork,
- A lecture by Nikša Ilović on the topic "Good Interpersonal Relations at Work," offering employees practical advice for improving communication and collaboration,
- An inspiring talk by Suzana Krstić, a former HT employee and expert in personal and professional development, who, through her story and the message #budidobro, encouraged employees to embrace authenticity, self-care and building meaningful relationships in all areas of life.

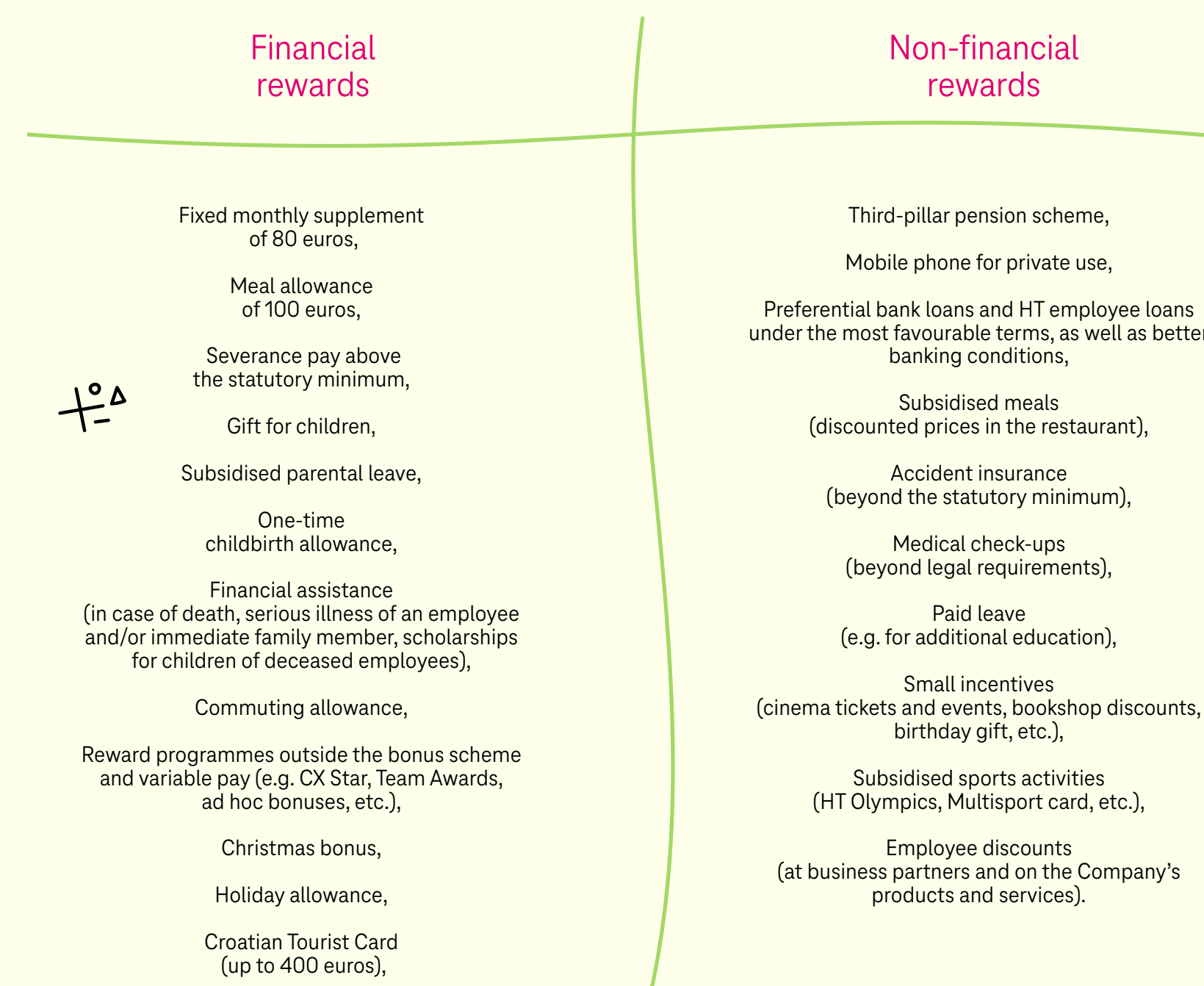
Employees' rights and benefits

The rights provided to employees vary depending on the company where they work and are appropriately adapted to the type of job and employee profile. HT strongly emphasises ensuring that its employees can exercise their collective bargaining rights. As many as 92% of all HT Group employees are covered by the respective collective bargaining agreements. In the Republic of Croatia, the Collective Agreement of HT is applied to employees of HT d.d., but not to HT's managers, while in Montenegro, the Collective Agreement of CT is in force, which applies to all employees. The Collective Agreement of HT only applies to HT d.d. and does not apply to other affiliated companies of the HT Group in the Republic of Croatia.

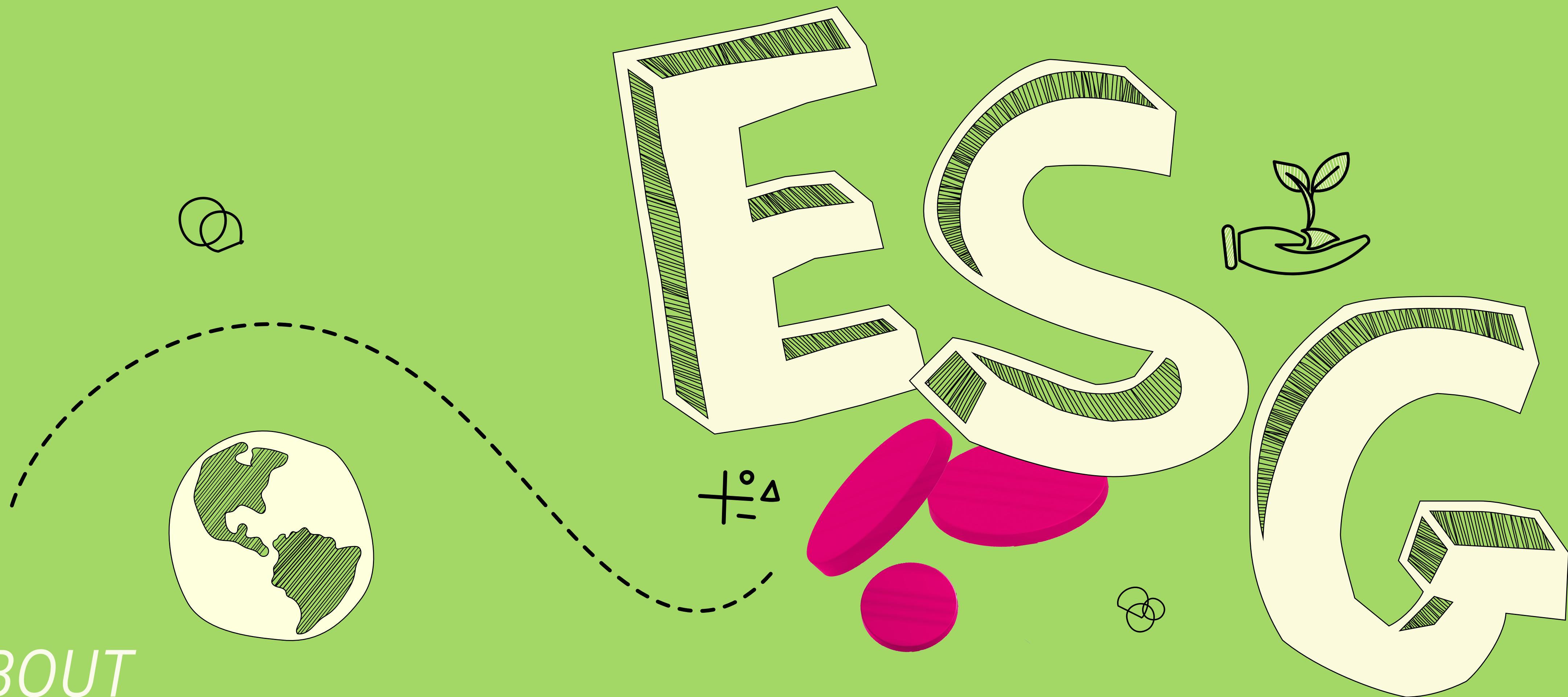


EMPLOYEE HEALTH, SAFETY AND WELL-BEING

In addition to the basic rights, HT strives to keep its employees motivated by offering a range of financial and non-financial rewards. Some financial benefits provided to employees include bonuses and salary supplements for various significant life events, such as childbirth assistance, parental leave subsidies, and severance payments exceeding the statutory minimum. The non-financial rewards include employee discounts, accident insurance, regular medical check-ups, a third-pillar pension scheme and many others.



*ABOUT
THE REPORT*

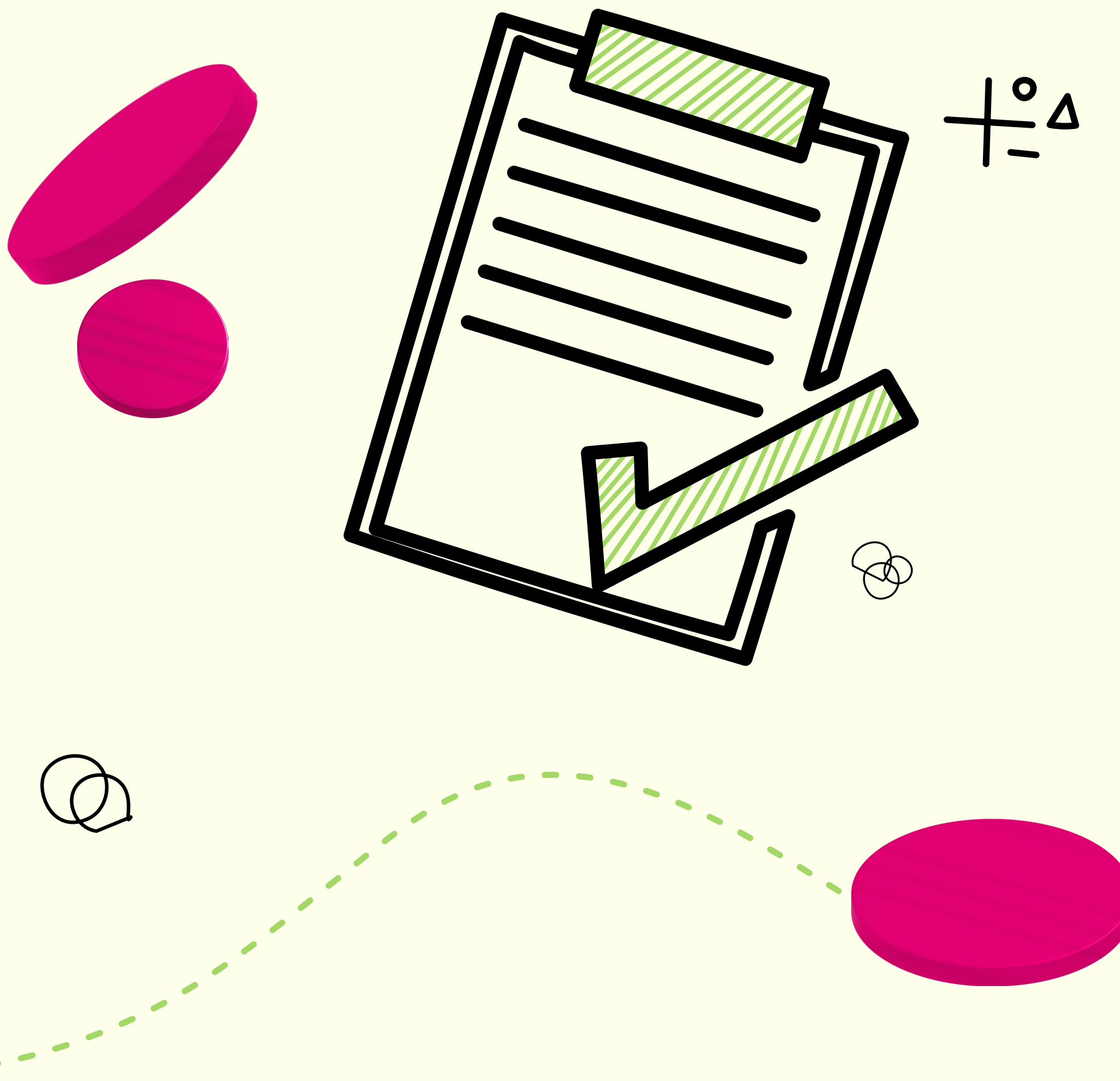


ABOUT THE REPORT

HT Group's Corporate Responsibility Report for 2024 has been prepared in accordance with the Global Reporting Initiative (GRI) standards. This report includes GRI disclosures on HT's impacts on people and the environment and serves as a supplement to the HT Group's Sustainability Report for 2024, published as part of the **HT Group's Annual Report for 2024** that covers the reporting period from 1 January to 31 December 2024, and includes consolidated data for all HT Group members covered by the HT Group's Annual Report for 2024.

HT Group regularly, transparently, and annually reports on its business practices. HT Group's Annual Report for 2024 includes detailed consolidated information on the business performance, financial position, and operations of HT Group and its affiliated companies. As part of the Management Report, the consolidated Sustainability Report is published in accordance with the European Sustainability Reporting Standards (ESRS). The information published in the HT Group's Sustainability Report for 2024 has been verified and confirmed by an Independent Limited Assurance Report, published within the HT Group's Annual Report for 2024.

All previous HT Group reports on sustainability, responsible business practices, and environmental protection are available on the HT Group website: <https://www.t.ht.hr/drustvena-odgovornost>. Stakeholders' views on corporate sustainability and responsibility help guide the Group's sustainability management. Any questions, comments, or suggestions regarding the content of this report can be sent by email to: drustvena.odgovornost@t.ht.hr.



GRI indicators

GRI standard	Disclosure	Page	Chapter
GRI 1: Foundation 2021.			
GRI 2: General Disclosures 2021			
GRI 2: General Disclosures 2021	2–1 Organizational details	5	Sustainable and responsible business conduct
	2–2 Entities included in the organization's sustainability reporting	45	About the report / HT Group's Annual Report for 2024
	2–3 Reporting period, frequency and contact point	45	About the report
	2–4 Restatements of information	/	
	2–5 External assurance	45	About the report / HT Group's Annual Report for 2024
Activities and workers			
GRI 2: General Disclosures 2021	2–6 Activities, value chain and other business relationships	5	Sustainable and responsible business conduct / HT Group's Annual Report for 2024
	2–7 Employees	5, 38	Sustainable and responsible business conduct / The most desirable employer / HT Group's Annual Report for 2024
	2–8 Workers who are not employees	/	HT Group's Annual Report for 2024
Governance			
GRI 2: General Disclosures 2021	2–9 Governance structure and composition	10	Sustainable and responsible business conduct / HT Group's Annual Report for 2024
	2–10 Nomination and selection of the highest governance body	/	HT Group's Annual Report for 2024
	2–11 Chair of the highest governance body	10	Sustainable and responsible business conduct / HT Group's Annual Report for 2024
	2–12 Role of the highest governance body in overseeing the management of impacts	/	HT Group's Annual Report for 2024
	2–13 Delegation of responsibility for managing impacts	/	HT Group's Annual Report for 2024
	2–14 Role of the highest governance body in sustainability reporting	/	HT Group's Annual Report for 2024
	2–15 Conflicts of interest	/	HT Group's Annual Report for 2024
	2–16 Communication of critical concerns	/	HT Group's Annual Report for 2024
	2–17 Collective knowledge of the highest governance body	/	HT Group's Annual Report for 2024
	2–18 Evaluation of the performance of the highest governance body	/	HT Group's Annual Report for 2024
	2–19 Remuneration policies	/	HT Group's Annual Report for 2024
	2–20 Process to determine remuneration	/	HT Group's Annual Report for 2024
	2–21 Annual total compensation ratio	/	HT Group's Annual Report for 2024
Strategy, policies and practices			
GRI 2: General Disclosures 2021	2–22 Statement on sustainable development strategy		Foreword from the President of the Management Board
	2–23 Policy commitments	/	HT Group's Annual Report for 2024
	2–24 Embedding policy commitments	12	Sustainable and responsible business conduct / HT Group's Annual Report for 2024
	2–25 Processes to remediate negative impacts	/	HT Group's Annual Report for 2024
	2–26 Mechanisms for seeking advice and raising concerns	/	HT Group's Annual Report for 2024
	2–27 Compliance with laws and regulations	/	HT Group's Annual Report for 2024
	2–28 Membership associations		Sustainable and responsible business conduct
Stakeholder engagement			
GRI 2: General Disclosures 2021	2–29 Approach to stakeholder engagement	/	HT Group's Annual Report for 2024
	2–30 Collective bargaining agreements	42	The most desirable employer / HT Group's Annual Report for 2024

GRI standard	Disclosure	Page	Chapter
GRI 3: Material Topics 2021	3–1 Process to determine material topics	11	Sustainable and responsible business conduct / HT Group's Annual Report for 2024
GRI 3: Material Topics 2021	3–2 List of material topics	11	Sustainable and responsible business conduct
Ethical business conduct			
GRI 3: Material Topics 2021	3–3 Management of material topics	7	Sustainable and responsible business conduct / HT Group's Annual Report for 2024
GRI 204: Procurement Practices 2016	204–1 Proportion of spending on local suppliers	5	Sustainable and responsible business conduct
GRI 205: Anti-Corruption 2016	205–1 Operations assessed for risks related to corruption	/	HT Group's Annual Report for 2024
	205–2 Communication and training about anti-corruption policies and procedures	7	Sustainable and responsible business conduct / HT Group's Annual Report for 2024
	205–3 Confirmed incidents of corruption and actions taken	/	HT Group's Annual Report for 2024
GRI 307: Environmental Compliance 2016	307–1 Non-compliance with environmental laws and regulations	/	HT Group's Annual Report for 2024
Strong corporate culture			
GRI 3: Material Topics 2021	3–3 Management of material topics	7	Sustainable and responsible business conduct / HT Group's Annual Report for 2024
Digital solutions for sustainable business			
GRI 3: Material Topics 2021	3–3 Management of material topics	15	Business digitalisation
Infrastructure for a digital society			
GRI 3: Material Topics 2021	3–3 Management of material topics	17	Business digitalisation / HT Group's Annual Report for 2024
GRI 201: Economic Performance 2016	201–4 Financial assistance received from government	18	Business digitalisation / HT Group's Annual Report for 2024
GRI 203: Significant Indirect Economic Impacts 2016	203–1 Infrastructure investments and services supported	17–20	Business digitalisation / HT Group's Annual Report for 2024
	203–2 Significant indirect economic impacts	17–20	Business digitalisation / HT Group's Annual Report for 2024
Contribution to climate protection			
GRI 3: Material Topics 2021	3–3 Management of material topics	21	Business digitalisation / HT Group's Annual Report for 2024
GRI 302: Energy 2016	302–1 Energy consumption within the organization	21	Business digitalisation / HT Group's Annual Report for 2024
	302–3 Energy intensity	22	Business digitalisation / HT Group's Annual Report for 2024
	302–4 Reduction of energy consumption	22	Business digitalisation / HT Group's Annual Report for 2024
GRI 305: Emissions 2016	305–1 Direct (Scope 1) GHG emissions	22	Business digitalisation / HT Group's Annual Report for 2024
	305–2 Energy indirect (Scope 2) GHG emissions	22	Business digitalisation / HT Group's Annual Report for 2024
	305–3 Other indirect (Scope 3) GHG emissions	22	Business digitalisation / HT Group's Annual Report for 2024
	305–4 GHG emissions intensity	/	HT Group's Annual Report for 2024
	305–5 Reduction of GHG emissions	/	HT Group's Annual Report for 2024
Circular business models			
GRI 3: Material Topics 2021	3–3 Management of material topics	24	Resource-efficient business
Responsible resource use			
GRI 3: Material Topics 2021	3–3 Management of material topics	25	Resource-efficient business / HT Group's Annual Report for 2024
GRI 301: Materials 2016	301–1 Materials used by weight or volume	/	HT Group's Annual Report for 2024
	301–3 Reclaimed products and their packaging materials	26	Resource-efficient business
GRI 306: Waste 2020	306–1 Waste generation and significant waste-related impacts	25	Resource-efficient business / HT Group's Annual Report for 2024
	306–2 Management of significant waste related impacts	25	Resource-efficient business / HT Group's Annual Report for 2024
	306–3 Waste generated	25	Resource-efficient business / HT Group's Annual Report for 2024
	306–4 Waste diverted from disposal	25	Resource-efficient business / HT Group's Annual Report for 2024
	306–5 Waste directed to disposal	25	Resource-efficient business / HT Group's Annual Report for 2024

Digital inclusion			
GRI 3: Material Topics 2021	3–3 Management of material topics	28	Digital society of equal opportunities / HT Group's Annual Report for 2024
Digital literacy			
GRI 3: Material Topics 2021	3–3 Management of material topics	30	Digital society of equal opportunities
Cooperation with local communities			
GRI 3: Material Topics 2021	3–3 Management of material topics	31	Digital society of equal opportunities
Data security and protection			
GRI 3: Material Topics 2021	3–3 Management of material topics	33	Secure digital environment
Data privacy			
GRI 3: Material Topics 2021	3–3 Management of material topics	34	Secure digital environment / HT Group's Annual Report for 2024
GRI 418: Customer Privacy 2016	418–1 Substantiated complaints concerning breaches of customer privacy and loss- es of customer data	34	Secure digital environment
Best customer experience			
GRI 3: Material Topics 2021	3–3 Management of material topics	35	Secure digital environment / HT Group's Annual Report for 2024
Stimulating and diverse business environment			
GRI 3: Material Topics 2021	3–3 Management of material topics	37	The most desirable employer / HT Group's Annual Report for 2024
GRI 401: Employment 2016	401–1 New employee hires and employee turnover	/	HT Group's Annual Report for 2024
GRI 405: Diversity and Equal Opportu- nity 2016	405–1 Diversity of governance bodies and employees	38	The most desirable employer / HT Group's Annual Report for 2024
	405–2 Ratio of basic salary and remuneration of women to men	38	The most desirable employer / HT Group's Annual Report for 2024
GRI 406: Non-discrimination 2016	406–1 Incidents of discrimination and corrective actions taken	/	HT Group's Annual Report for 2024
Employee development and talent attraction			
GRI 3: Material Topics 2021	3–3 Management of material topics	39	The most desirable employer
GRI 404: Training and Education 2016	404–1 Average hours of training per year per employee	39	The most desirable employer
	404–2 Programs for upgrading employee skills and transition assistance programs	40	The most desirable employer
Employee health, safety and well-being			
GRI 3: Material Topics 2021	3–3 Management of material topics	41	The most desirable employer / HT Group's Annual Report for 2024
GRI 403: GRI Occupational Health and Safety 2018	403–1 Occupational health and safety management system	41	The most desirable employer / HT Group's Annual Report for 2024
	403–2 Hazard identification, risk assessment, and incident investigation	/	HT Group's Annual Report for 2024
	403–3 Occupational health services	/	HT Group's Annual Report for 2024
	403–4 Worker participation, consultation, and communication on occupational health and safety	/	HT Group's Annual Report for 2024
	403–5 Worker training on occupational health and safety	/	HT Group's Annual Report for 2024
	403–6 Promotion of worker health	/	HT Group's Annual Report for 2024
	403–7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	/	HT Group's Annual Report for 2024
	403–8 Workers covered by an occupational health and safety management system	41	The most desirable employer / HT Group's Annual Report for 2024
	403–9 Work-related injuries	41	The most desirable employer / HT Group's Annual Report for 2024
	403–10 Work-related ill health	41	The most desirable employer / HT Group's Annual Report for 2024



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your world.

Hrvatski Telekom d.d.
Sustainability Governance
Radnička cesta 21
10000 Zagreb, Hrvatska
Tel: +385 1 4911 000
E-mail: drustvena.odgovornost@t.ht.hr
www.t.ht.hr