June 2025

Sustainability report 2024

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Introduction

About this report

This report contains a detailed review of Hi3G Denmark ApS's *(hereafter 3)* Corporate Social Responsibility and Data Ethics. It forms part of the Management's review in *3's* Annual Report. With this report, *3* (which includes OiSTER and Flexii) aims to continually reflect and improve the approach to sustainability and respond to the interests of its stakeholders.

Reporting period
This sustainability report covers the period 1st of January 2024 to 31st of December 2024 with the inclusion of developments, since the last reporting period, considered significant.

Reporting scope
This report covers the activities of *3*.

Reporting frameworks
3 applies the same framework and calculation methods as our majority owners, CK Hutchison Holdings Limited (hereafter CKHH). For more information on the calculation methods and emission factors applied, please read the reporting criteria from CK Hutchison Group Telecom (hereafter CKHGT).

About 3

3 was launched in Denmark in 2003. As a new and smaller player in a mature market, we took on a role as a challenger driven by innovation. By breaking the conventions and constantly keeping customers in focus, *3* entered the position as the 3rd largest telecommunications company in the Danish market in 2022.

We have built our own 3G-, 4G- and lately 5G-network covering all of Denmark. *3's* core business is mobile services and data connections, and it is based on our investment in building a mobile network, which we continue to expand and upgrade. We also offer our customers a range of additional services and hardware (telephones, routers, and accessories) as well as qualified support and advice to both private and business customers through our customer service. In recent years, 3Insights has been a growing business area that provides valuable tools for mapping and analysing mobility data.

By looking at the population's anonymized travel and movement patterns, companies and society can get valuable insight into how infrastructure is optimized to benefit both citizens and society.

3 is headquartered in Copenhagen and runs sales to customers via www.3.dk, stores across Denmark and our customer service. Additionally, *3* owns and operates the telco brands OiSTER and Flexii, which also offer mobile services and data connections via www.oister.dk and www.flexii.dk.

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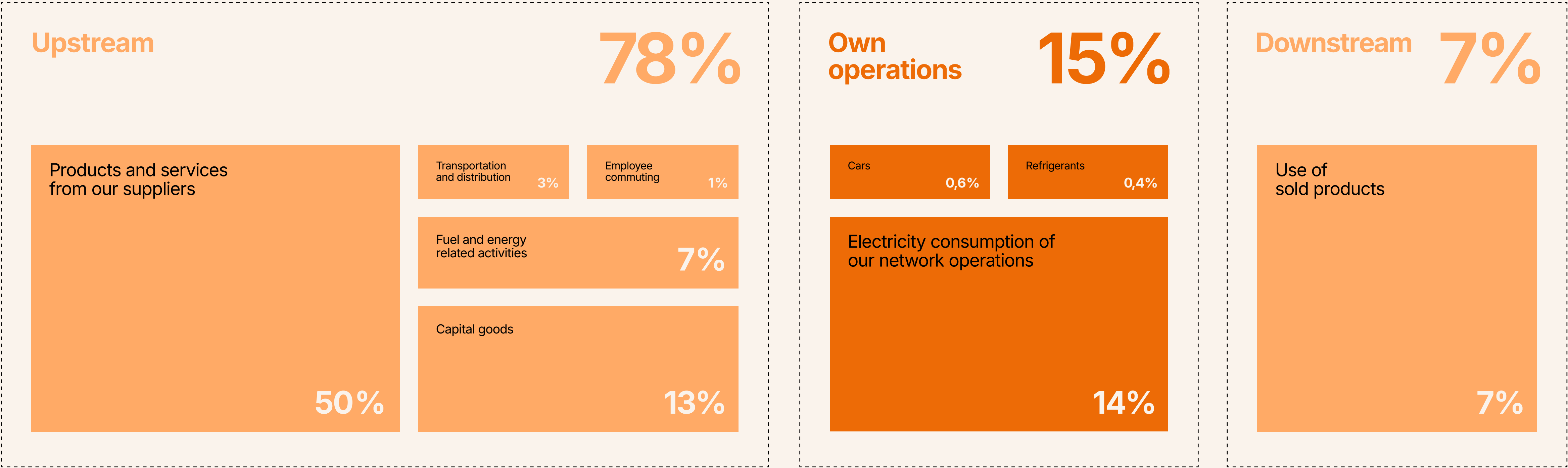
Emissions share per category

We calculate our emissions based on the *GHG*-protocol, structuring categories along the value chain in upstream, own operations and downstream. Along our value chain, the following three categories have the biggest impact:

Purchased products and services within the upstream part of our value chain, our network's electricity consumption in our own operations, and the use of sold products in the downstream part of our value chain. In 2024, we have commenced the journey of supplier engagement via the *CDP* supply chain tool, and will further progress in this area. 3 is strengthening its network to improve energy efficiency, stability, and performance. By mid-2025, we will complete the modernization of all existing 3G and 4G sites. In parallel, we plan to build around 400 new

4G and 5G sites in the coming years to boost coverage and capacity. This transformation supports the ongoing industry shift from 3G to advanced technologies, with our 3G network scheduled to shut down by the end of 2025. These strategic investments will meet growing demand for high-speed mobile data and deliver a more reliable, future-ready network for our customers. We have further secured Renewable Energy Certificated (RECs) covering our annual electricity consumption since 2022. Our core business includes mobile and broadband services

to consumers and companies. As the sole mobile-only company, *3* provides critical infrastructure and plays a central role in the development of the digital society, e.g. with our IoT solutions and data insights which contribute to developing innovative solutions. We are actively working on reducing the amount of waste, especially Waste from Electrical and Electronic Equipment (WEEE). We address this both among our customers ('Byt til nyt') and internally through repair, resale of devices, and recycling of old and decommissioned network equipment.

Upstream — 78%

Products and services from our suppliers — **50%**

Transportation and distribution — **3%**

Employee commuting — **1%**

Fuel and energy related activities — **7%**

Capital goods — **13%**

Own operations — 15%

Cars — **0,6%**

Refrigerants — **0,4%**

Electricity consumption of our network operations — **14%**

Downstream — 7%

Use of sold products — **7%**

Note: Percentages may not add up to 100, due to rounding.

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3's Approach to sustainability

Sustainability governance
Reporting to the CEO, the senior management of *3* is the highest-level executive decision-making body. *3's* upper management forms the highest executive level, followed by the GRC board, which is represented by executives. Since 2023, there is the sustainability council which represents each division ensuring embedment in the business.

Stakeholder engagement and materiality
In 2024, we completed our first double materiality analysis *(DMA)* both locally as *3*, as well as on group level together with CKHGT to identify the areas where we as a company have a material sustainability impact on the environment, and the sustainability-related risks and opportunities arising from our activities.

The *DMA* has been carried out as part of the preparation for compliance with the Corporate Sustainability Reporting Directive *(CSRD)*. The results of the local *DMA* can be found in the Climate Governance and Reporting section.

UN Global Compact
Since 2022, *3* has been part of the *UN* Global Compact *(UNGC)* and the local network in Denmark. The Strategy of *UNGC* is to drive business awareness and action in support of achieving the sustainable development goals *(SDGs)* by 2030. *UNGC's* mission is to mobilize a global movement of sustainable companies and stakeholders to create a better world.

Strategy setting
As a growing telecommunications company, we are continuously working to further develop our operations in a considerate manner and integrate responsible choices in customer offerings. We play an active role in building a digitally enabled society while supporting the creation of long-term value for our stakeholders. Based on the results of the *DMA*, we will set our strategic ambitions with key focus areas. As a subsidiary of CKHGT, we support their sustainability strategy, with the following goals: *"Operating responsibly and with integrity", "Creating a thriving digital economy"*, *"Promoting circular economy"*, *"Creating great places to work"*, and *"Taking action on climate change"*. In 2025, this strategy will be updated.

"In this fast-evolving landscape, innovation remains at the heart of our strategy."

Message from the CEO

In a rapidly evolving global landscape, *3*, like every other company, must navigate new and fast-changing conditions that impact our ability to continue developing our business and serve our customers. This requires a strong ability to balance sustainability, security, and innovation, navigating the complex intersection of geopolitical dynamics and regulatory shifts, as the international stage is increasingly shaped by heightened security concerns and the pressing need to protect critical infrastructure.

Protecting our customers' data and our infrastructure remains a top priority. As we continue to deploy advanced technologies—such as 5G, Artificial Intelligence (AI) and Internet of Things (IoT) solutions— the need to secure our network becomes increasingly critical to ensuring business continuity and service reliability. In line with the Network and Information Security (NIS) Directive, we are intensifying our focus on cybersecurity and operational resilience, continuously strengthening our protocols to safeguard our critical infrastructure and uphold the trust of our customers.

Our ongoing work to meet the Corporate Sustainability Reporting Directive *(CSRD)* represents a significant commitment to transparency and accountability in sustainability practices.

The *CSRD* will have profound implications on our reporting processes, requiring us to disclose detailed and standardized sustainability data. While we have made some progress, such as reducing our carbon intensity, there are still gaps to close. This includes not only reducing environmental impacts, but also embedding sustainability into our governance, risk management, and corporate strategies even further.

The work is substantial, but it is essential to ensure transparency, accountability and responsibility as one of the top three mobile operators in Denmark. In this fast-evolving landscape, innovation remains at the heart of our strategy. However, fostering innovation is not just about developing new products and services, it is also about building a culture that attracts and retains talent. We need to empower and upskill our employees, embrace diversity,

and promote an inclusive work culture. By doing so, we create the necessary conditions for innovation to thrive and for our teams to drive customer excellence. We further acknowledge that sustainable impact cannot be achieved in isolation. As such, we will continue the effort in actively working with our partners along our value chain, to ensure that they, too, adopt sustainable practices.

"While we are proud of the progress in advancing our sustainability agenda so far, we are mindful of the challenges that lie ahead. We remain steadfast in our commitment to achieving our emission reduction targets, contributing to cyber security efforts, and fostering a culture of inclusion and innovation."

By maintaining a focus on the interconnectedness of security and sustainability, I am confident that we will continue to create value for our stakeholders, protect our customers, and contribute to a sustainable future.

Morten Christiansen,
Regional CEO Austria, Denmark, and Sweden

Overview of achievements in 2024

Strategic pillar	Material impact area	Related SDGs				Efforts	Achievements
Taking action on climate change	Climate change. Energy.	SUSTAINABLE CITIES AND COMMUNITIES	CLIMATE ACTION			• Participation in climate scenario analysis project. • Refurbished device offerings. • Number of company cars reduced. • Network modernization continued.	**Total emission reduction of 55% compared to 2020 baseline.**
Creating great places to work	Employee development. Diversity, equity and inclusion.	QUALITY EDUCATION	GENDER EQUALITY	DECENT WORK AND ECONOMIC GROWTH		• Stakeholder engagement through our Coding Class project. • 128 participants in our 3Academy.	**47% female representation in senior leadership roles.**
Operating responsibly and with integrity	Privacy. Data protection. Cyber security.	RESPONSIBLE CONSUMPTION AND PRODUCTION	PEACE, JUSTICE AND STRONG INSTITUTIONS			• Supplier engagement through *CDP* supply chain tool. • Launch of e-learnings for employees. • Governance and practices for ethical procurement. • New compliance tool implemented. • Strengthened technological support to better integrate compliance efforts across departments.	**Unified risk management framework across shared IT and network in Scandinavia.**
Creating a thriving digital economy	Innovation.	GOOD HEALTH AND WELL-BEING	INDUSTRY, INNOVATION AND INFRASTRUCTURE	SUSTAINABLE CITIES AND COMMUNITIES	CLIMATE ACTION	• More than two pilot projects launched, testing advanced 5G technologies with a particular focus on network reliability and security in high-demand environments.	**More than 99% 5G coverage.**

This table shows our key achievements from 2024, mapped to CKHGT's strategic pillars and material impacts assessed. It also visualises which *SDGs* relate to the respective area.

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Taking action on climate change

Climate governance and reporting

At *3*, we are continuously assessing areas for improvement to increase automation and ensure higher quality data in relation to sustainability requirements. We are committed to ensuring the accuracy of our sustainability progress by establishing. Greenhouse gas *(GHG)* data for 2024 was calculated in accordance with the *GHG* Protocol and CKHGT GHG Reporting Criteria 2023. Increasing demands for sustainability reporting, such as the Corporate Sustainability Reporting Directive *(CSRD)* and *EU Taxonomy*, affect *3's* processes and organization. These include a formal reporting framework meeting current and future national and international requirements. During 2024, *3* completed a comprehensive

Double Materiality Analysis *(DMA)* in accordance with the *CSRD* locally, and started a *DMA* driven by CKHGT, involving engagement with different stakeholder groups through interviews and surveys. By informing the future development of the sustainability strategy, the *DMA* will help us prioritize relevant sustainability matters, get a solid understanding of *3's* sustainability impacts and serve as a foundation for reporting and disclosure purposes.

Areas of materiality will be addressed in a more structured manner, and the results of the *DMA* in accordance with the European Sustainability Reporting Standards *(ESRS)* will lead to a review of our current targets and KPIs to reflect the material areas of focus. Both *DMA's* reflect the status at that time, before new EFRAG guidelines were published, and the Omnibus package was proposed in 2025. This may be subject to change as we will continuously reassess and update the DMA as planned. The following table shows the materiality results from *3's DMA* conducted in 2024.

Table 2: Materiality results of 3's DMA 2024.

| | Double material | Financial material | Impact material |

E1 Climate Change	S1 Own Workforce	S4 Consumers and end-users
Climate change adaptation	Working conditions	Information-related impacts for consumers and/or end-users
Climate change mitigation		Personal safety of consumers and/or end-users
Energy		Social inclusion of consumers and/or end-users

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Science Based Targets initiative
As a subsidiary of CKHGT, *3* has committed to their near-term science-based targets, which were approved by the Science Based Targets initiative *(SBTi)* in 2022 and are consistent with a path to 1.5 degrees Celsius. CKHGT commits to reduce absolute Scope 1 and 2 *GHG*-emissions by 50% by 2030 from a 2020 base year. CKHGT also commits to reducing absolute Scope 3 emissions 42% within the same period. The *SBTi* drives ambitious climate action in the private sector by enabling organizations to set science-based emissions reduction targets.

Carbon Disclosure Project
As a subsidiary of CKHGT, *3* participates in reporting to the Carbon Disclosure Project *(CDP)* and gets the opportunity to track and benchmark our environmental performance, build trust through transparency, and respond to rising environmental concerns among our suppliers, customers, partners and, not least, the public.

Efforts in
2024

- Completion of the local business *DMA* in accordance with requirements of *CSRD*.

- Completion of the group wide *DMA* with CKHGT.

- Participation in climate scenario analysis project to help making strategic and risk management decisions under complex and uncertain future conditions such as climate change.

- Continued improvement of workflows, processes, and governance documents to equip *3* to meet complex external requirements as well as internal objectives.

Expectations for
2025

- Complete the development of a local sustainability strategy.

- Enhance the procedure document with details on the process for identifying and collecting the correct data, and thereby further improve data governance and data quality.

- Set short-term and long-term targets.

- Enhance reporting instructions, manuals, and guidelines.

- Implement further internal controls.

GHG-Footprint and emission performance

In 2020, the information and telecommunications (ICT) sector accounted for around 4% of global electricity consumption and approximately 1.4% of global CO_2e emissions*. This includes fixed and mobile networks, data centres, the manufacture and use of devices. This footprint is set to grow, as the amount of digitally enabled businesses and consumers continues to increase while data usage is expected to rise. Political involvement (e.g. the Paris Agreement) puts positive pressure on companies that must comply with continually increasing demands. It also entails risk and uncertainty for long-term planning and compliance. Furthermore, increased energy prices pose a financial risk, while increasing energy consumption presents an operational risk. In this context, it is imperative that *3* implements a GHG-reduction strategy, to meet the needs of customers in a sustainable and environmentally responsible way, now and in the future. Therefore, we started to calculate our *GHG*-emissions in 2018, following the *GHG*-protocol, with our baseline being 2020.

Climate targets
- Reduce absolute Scope 1 and 2 emissions by 50% by 2030 from a 2020 base year.
- Reduce absolute Scope 3 emissions 42% by 2030 from a 2020 base year.

Policies
- Environmental policy.

Efforts in
2024

- Procurement of Renewable Energy Certificates (RECs) to cover our electricity consumption.

- Supplier engagement to increase supplier specific emission factors and moving to a hybrid Scope 3 calculation method.

- Continued replacement of combustion engine cars with electrical vehicles.

- Continued modernization of our network.

- Launched the project of offering refurbished mobile phones for sale.

Expectations for
2025

- Completing Swap to 5G.

- Developing a climate transition plan with substantiate initiatives and make them measurable.

- Developing an extensive supplier engagement program to further increase supplier specific emission factors.

Figure 1:
Our CO$_2$e emissions [tCO$_2$e]; Total 2020 – 2024.

	2020	2021	2022	2023	2024
	70.693	86.759	59.798	44.087	31.727
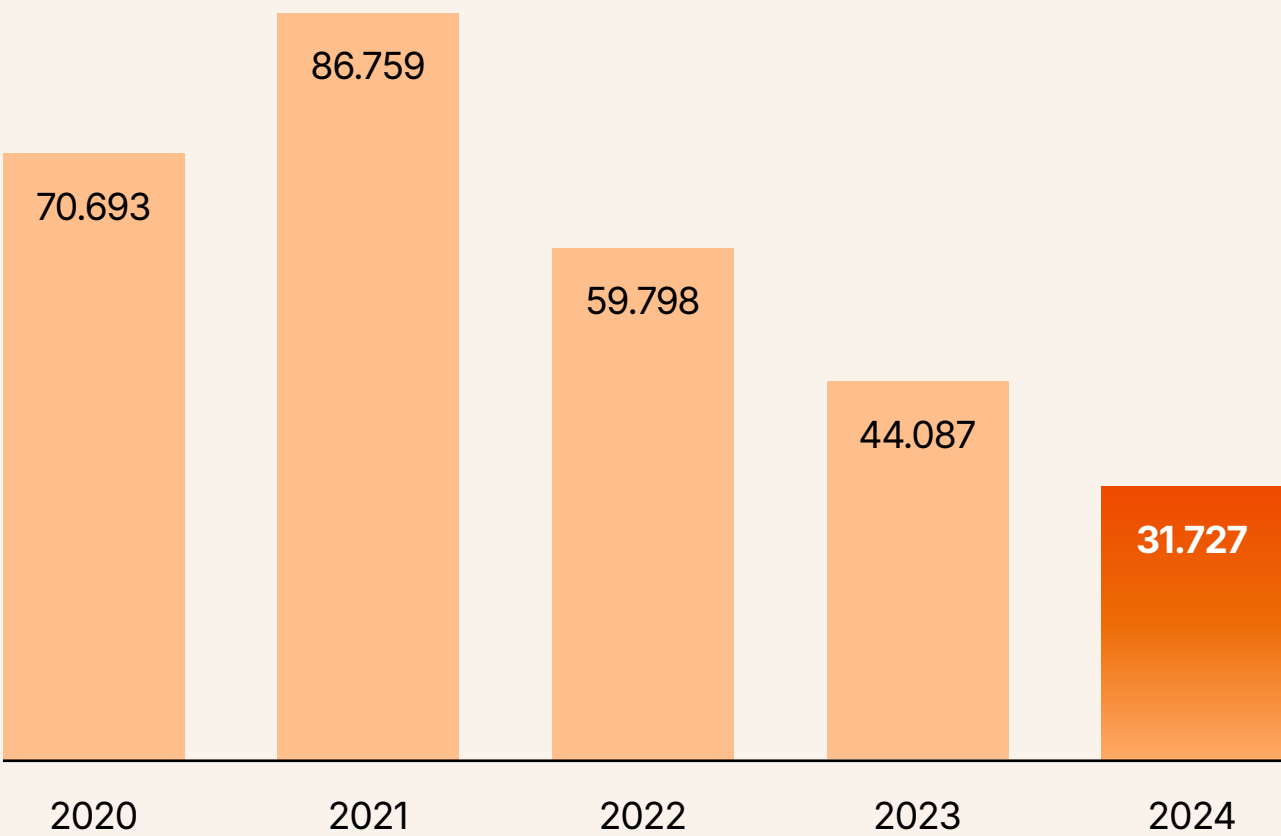
Figure 2:
Our CO$_2$e emissions [tCO$_2$e]; Scope 1, 2 and 3 2024.

Scope 1	Scope 2	Scope 3
239	249	31.237
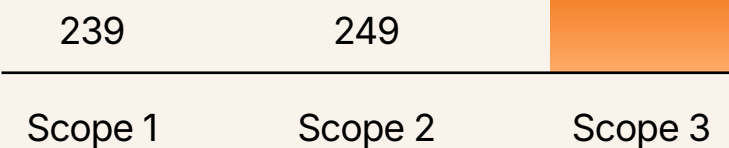
Emission performance in numbers

The foundation of pursuing this successfully is the mapping of our own emissions. Measuring our CO$_2$e emissions helps us to identify areas where we can reduce emissions and improve. The initial CO$_2$e reductions will entail optimizing energy efficiency, general energy savings and procurement of energy produced from renewable sources. Further, we will involve suppliers, customers and other partners to implement reduction initiatives related to our Scope 3 reduction target.

CKHGT has engaged KPMG LLP to carry out a limited assurance review of the Group's emissions in scope 1, 2 and 3, which also includes 3. As the review of the Group's emissions in 2024 has not been completed at the time of publication of 3's sustainability report, the reported outcome for the year in the table presented may be adjusted in the event of any deviations. Compared to our 2020 baseline, our total emissions reduced by 55%. Compared to 2023, our total emissions reduced by 28%, as shown in figure 1. The largest part of our emissions derives from our value chain, Scope 3, as shown in figure 2.

Emission intensities

Emission intensity is generally defined as the amount of CO$_2$e emissions released per unit of another variable, such as (service) revenue. By reducing our emissions since 2020, we have also reduced our emission intensity, which is visualised in table 3.

Table 3: Our CO$_2$e emissions intensity [tCO$_2$e/ mDKK Service Revenue], Scope 1, 2 and 3 for 2020, 2023 and 2024.

	2020	2023	2024
Scope 1 + 2	10,53	0,57	0,21
Scope 1 + 2 + 3	28,58	15,08	10,07

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Our circularity efforts

At *3*, we are committed to reducing the electronic waste that we generate. Since 2020, we have had our trade-in program called 'Byt til nyt', where customers can exchange e.g. used mobile devices, and in return receive a discount on their purchase. In 2024, we also launched the option to purchase used phones, called '3LikeNew'.

For our trade-in programme we have partnered with Foxway, who are preparing detailed reports on the treatment of returned devices. The table below shows the different outcomes for mobile devices and wearables for 2024.

Table 4: *Outcome of returned devices 2024.*

	Received	Reused	Reused (%)	Recycled	Recycled (%)
Mobile Devices					
Mobiles	5619	5539	98,6	80	1,4
Tablets	152	140	92,1	12	7,9
Wearables					
Smartwatches	64	55	85,9	9	14,1

Creating great places to work

Inclusion and diversity

At *3*, we aim to be a diverse and inclusive company with room for everyone, also to stay a preferred employer in the job market. As the attraction and retention of talent and future talent is one of the social risks *3* is aware of, this is a focus area of ours. Our Human Rights policy similarly addresses, among other things, the risk of mismanaged employee wellbeing and is formulated based on internationally recognized human rights principles, including those contained in the Universal Declaration of Human Rights, the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. The policy also embraces the UN Guiding Principles on Business and Human Rights.

To make sure all employees live up to our policy, we are developing clear guidelines and fostering a culture of accountability and continuous improvement. Furthermore, leadership commitment and transparent enforcement of disciplinary measures are crucial to maintain this standard. Due to our efforts, we had no incidents regarding human rights in the fiscal year 2024. To ensure equal access to vacancies for everyone, *3* has a special focus on systemic barriers, the support of individual development and on fostering an inclusive organizational culture. For example, job advertisements are adapted to motivate a diverse applicant pool. The content of the job advertisements is very descriptive in this respect and sheds light on the working day, the environment and *3's* values. We are ensuring a diverse hiring panel and setting clear, transparent criteria for promotions.

The telecommunications industry is characterized by a large turnover of employees. Therefore, we are particularly aware of potential dissatisfaction and of maintaining the open, innovative, and safe culture that we

Table 5: Gender equality targets.

	Target in %	Target year
Board of Directors	40/60	2032
Senior Management	40/60	2032
Next level management	40/60	2032

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have spent many years building. We continuously seek to have a diverse group of employees.

Below we list implemented policies and initiatives for improving the share of underrepresented genders in our management layers, and thus for meeting the 2032 targets, as well as planned measures for 2025.

Policies
- Whistleblower policy.
- Gender balance and diversity policy.
- Our Human Rights policy ensures clear guidelines and includes consequences - like employment sanctions - in connection with breaches.
- Employee handbook sets guidelines for e.g. working environment, employee benefits and maternity leave.
- Employee Code of Conduct.

Efforts in
2024

Gender balance
- Requirement that candidates from the underrepresented gender are always included in shortlists for leadership positions.

- Achievement of min. 40% female representation in Senior Management at end of year.

Employee engagement
- Implementation of quarterly employee satisfaction surveys with feedback sessions and practical initiatives (e.g. workshops) where survey results show the need.

- Annual performance review, including development plans received by ca 96% of FTEs.

Flexible working hours and remote work
- Provide flexibility work hours so career development can be combined with other responsibilities.

- Family-Friendly Policies: Expanded parental leave and paternity/co-parental leave schemes to promote a more equal distribution of caregiving responsibilities.

Expectations for
2025

Gender balance
- Development of a targeted recruitment and talent program to create an internal talent pipeline for underrepresented genders, including leadership training, and career development.
- Project for making our retail stores more attractive for all genders.

Changing company culture
- Awareness Training, including mandatory unconscious bias training for leaders and recruitment panels.

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We have set target and are disclosing gender compositions for all management levels, starting from the highest (Board of Directors). At the end of the fiscal year 2024, we reached our gender distribution goal of min. 40% women within Senior Management, but not in the other areas, thus we will continue our work in this area consciously.

Table 5: Gender Distribution and Diversity Performance (%).

	2021		2022		2023		2024	
	F	M	F	M	F	M	F	M
Board of Directors	0	100	0	100	0	100	0	100
Senior management	37	67	33	67	43	57	43	57
Next level management	31	69	33	67	17	83	20	80
All management levels	–	–	–	–	–	–	24	76

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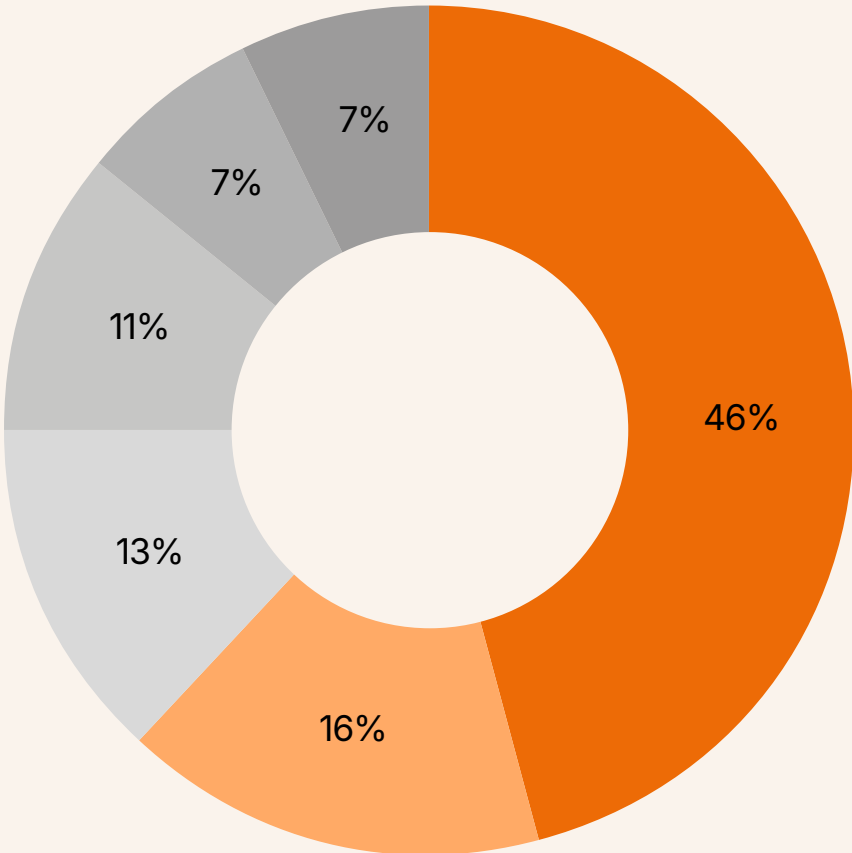# Employee learning and development

3Academy

At *3*, employees are our most valuable asset. We invest in our employees by offering educational programs to all employees to enhance their professional skills.

Our Academy Profession program, 3Academy, offers ECTS-accredited specialized training courses, continued education, and management training.

The program is offered to all employees at *3* but is especially popular among Customer Service, Shop and Sales employees, as it helps to obtain an Academy Profession degree of up to 60 ECTS-credits, while building work experience relevant to the degree.
As part of the 3Academy program, all candidates who apply to attend 3Academy are offered a career interview, where we create a career plan, where a 3Academy subject may be included in the plan. In 2024, we had 128 participants, and the most popular subjects were Sales and Sales Psychology, Project Management in practice, Project management, Marketing and business development, Financial management in practice and Commercial law. Following we will present three examples of 3Academy participants:

Figure 3: Share of subjects of 3Academy participants.

- Sales and Sales Psychology
- Management in practice
- Project management
- Marketing and business development
- Financial management in practice
- Commercial law

46%
16%
13%
11%
7%
7%

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Hibo Hussein
Operations Coordinator

"The ability to grow professionally without having to compromise other parts of life has been valuable."

Hibo joined *3* in 2022 and currently works as an Operations Coordinator for the entire Customer Service department. She began her journey at *3* as a Customer Advisor during her gap year and was quickly drawn to the strong company culture and the many opportunities for both personal and professional development.

One initiative that stood out to her was 3Academy, where she completed the course Communication in Practice. This course has contributed to the strengthening of both her personal and professional skills. Although Hibo is currently focused on her full-time role, she appreciates having the opportunity to continue learning and growing alongside her daily responsibilities. For her, *3* is a workplace that supports development, regardless of where you are in your career journey.

Oliver Joe Agergaard
Store Manager

"Writing assignments about 3 has given me an entirely new understanding of the company."

Oliver has been part of the *3* family for more than five years. He started as a sales assistant and had since progressed to the role of Store Manager – a position he has held for the past three years.

Through 3Academy, Oliver is currently studying an Academy Profession degree in Leadership. Balancing full-time work with education has equipped him with a wide range of new skills, which he actively applies in his day-to-day role. Becoming a manager was not originally part of his plan, but over time, he discovered a passion for motivating others.

Today, it is his team's development that drives him. He is committed to fostering a workplace culture that supports both well-being and robust performance.
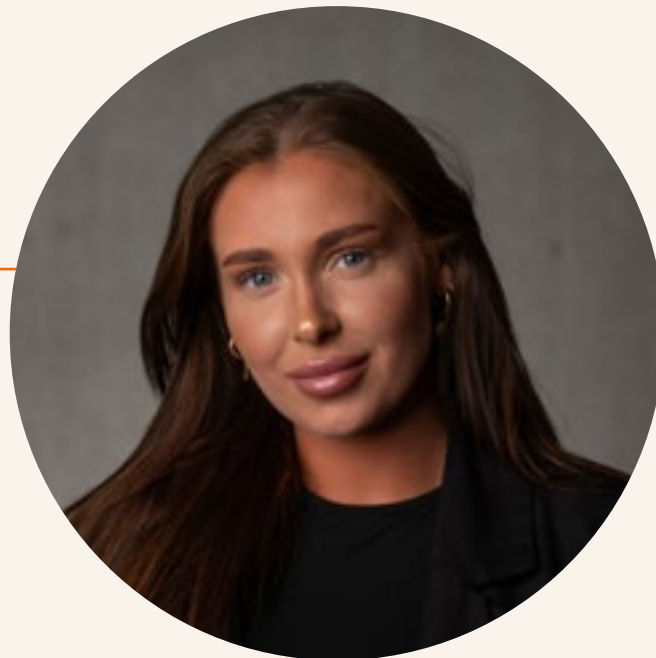
Anne-Kathrine Carstensen
Project Coordinator/2nd Brands

"The combination of professional growth, responsibility, and great colleagues makes every day work both motivating and enjoyable."

Anne-Kathrine works as a Project Coordinator and has been part of *3* for four years. What began as a temporary position during her gap year quickly evolved into a long-term career path. Over time, she has taken on new roles within the company and is currently pursuing an Academy Profession degree in Sales and Marketing through 3Academy.

Throughout her journey, Anne-Kathrine has built a solid set of skills that she applies in her daily work. For her, it is the combination of academic learning and practical, hands-on experience that makes professional development at *3* unique. She was positively surprised by how quickly things can move and how much responsibility you can be entrusted with, even early in your career.

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Community engagement

The Coding Class project has been running via Copenhagen Municipality for several years, connecting public schools with businesses to teach pupils about technology, coding and working life. Two separate groups of 6th graders are paired up with a company. The company will provide the students with a technical case, and the students, who are divided into smaller groups, will creative a prototype solution for the case.

2024 was the first time *3* participated. There were two classes of 6th graders with approx. 20 students each. One was Øster Farimagsgade Skole in the city, and the other one was Gerbrand Skolen on Amager. The two classes got the same assignment. In 2024, the task was to shorten the food queue in Parken stadium, using 5G technology. After working out a concept the students go through an initial round of feedback from representatives of *3* (a few colleagues with technical expertise and two

colleagues from Public Relations). Following, the pupils are invited to *3's* HQ to present their solutions through illustration they developed with an educational 3D-based programming tool. Afterwards, the group of students get a tour of the house, whereafter the winning group is announced.

The winning groups are then invited to *3's* Skybox in Parken to watch a Super League game, catering included. More about the Coding Class project can be read in this article.

Health and safety

Various training opportunities to ensure that safety principles are well understood and shared by all levels of employees. For example, topics such as fire safety, first aid training, awareness raising activities on personal security, health and safety, and the environment, are offered regularly.

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Operating responsibly and with integrity

Responsible procurement

With more than 800 local and international suppliers, we must ensure they meet appropriate maturity levels in line with what we consider acceptable. Therefore, we work purposefully with supplier management, which includes screening of suppliers and requirements imposed. Further, we focus on the ongoing implementation and revision of policies and procedures as well as awareness efforts among high-risk functions. Being a member of the *UN* Global Compact means that we hold international corporate Anti-Corruption and -Bribery *UN* standards in observance and that we always work within our definitions of good governance.

Policies
- The Supplier Code of Conduct entails several minimum requirements based on national legislation and international standards, such as the 10 *UNGC* principles.
- Whistleblower policy governing a speak up channel for both employees and external partners.

Efforts in
2024

- Engagement with relevant suppliers through *CDP* supply chain tool to increase supplier specific emission factors for Scope 3 emission calculations.

Expectations for
2025

- Categorization of suppliers/ business areas in the procurement process to achieve better oversight and enable targeted supplier engagement.
- Continually improve documentation of current efforts by implementing more stringent and risk-based supplier management.

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Anti-Corruption
and -Bribery

We define corruption as the misuse of one's position or power for one's own or others' gain, which includes bribery, extortion, embezzlement, and fraud.

Corruption also includes employee behaviour that is unjustifiably intended solely to give *3* a gain. Due to our efforts in the Anti-Corruption and -Bribery work, there were no incidents in the fiscal year 2024.

Policies
- Our Anti-Corruption and -Bribery policy ensures clear guidelines and includes consequences - like employment sanctions - in connection with breaches. It also refers to *3's* whistle-blower scheme and control bodies.

Efforts in
2024

- Continued compliance with our Anti-Corruption and -Bribery policies.

- New recurrent Anti-Corruption and –Bribery e-learning refresher training launched.

Expectations for
2025

- Initiatives to strengthen awareness, like ongoing implementation/revision of necessary policies and procedures as well as training efforts among high-risk functions (e.g. Sales and Procurement).

- Strengthened risk framework on compliance and potential misconduct to be implemented.

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Data ethics

This section describes our Data ethics policy, cf. section 99d of the Danish Financial Statements.

Our Data ethics policy covers the due considerations that must be weighed as we increasingly work more efficiently, develop smarter products, and make use of innovative technologies when processing data. In *3*, we interpret data ethics as considerations and standards that go beyond applicable data privacy and data protection regulation. Therefore, we make sure that our Data ethics policy is known by all our employees.

Policies
- The Data ethics policy sets out principles for data ethical considerations, including ensuring that data processing is transparent, and that we ensure that consequences and risks are weighed and documented, for example in relation to the use of special types of data and innovative technologies.
- Furthermore, ethically business conduct and considerations are supported by our new policy on use of artificial intelligence (AI) covering reasonable procurement, implementation and data ethical principles.

Efforts in
2024

- Initiation of a strengthened and integrated compliance program, including better technology support, to manage and document governance, data processing activities and compliance.

- Implementation of governance and practices for ethical procurement, implementation, and use of AI.

Expectations for
2025

- Improved governance across processes and documentation are being refined. The work will continue in 2025.

- Continued work on awareness-raising initiatives as part of a need for a stronger anchoring of data ethical considerations in the business divisions.

- Continued focus on utilizing the full capabilities in the compliance systems to support our compliance program initiatives and policy implementation.

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Privacy, Cyber- and Information security

3 provides critical digital infrastructure and is responsible for substantial amounts of personal data and other business-critical information. We are increasingly facing new and more restrictive legislation to protect our critical infrastructure and increase the security of services.

Policies
- Privacy, Information security and data protection policies according to governance standards and rules.

Efforts in
2024

- A unified risk management and compliance framework was implemented across Scandinavian IT and network operations, strengthening governance and regulatory alignment.

- A reinforced compliance program was introduced to support our Information Security Management System and enhance governance, risk, and compliance integration.

- Readiness for emerging regulations was enhanced, including the EU AI Act and NIS2 directive, through targeted initiatives and improved policy frameworks.

- An integrated awareness and e-learning program covering data privacy, information security, AI, and IT security was launched for all employees.

Expectations for
2025

- Evolve our information security strategy to ensure continued alignment with business priorities and upcoming regulatory requirements, including the EU AI Act and NIS2 directive.

- Further develop our Information Security Management System through increased automation, monitoring, and strengthened risk management processes.

- Enhance supply chain resilience and third-party risk governance in response to a dynamic threat and regulatory landscape.

- Deepen our security culture by expanding scenario-based training and targeted awareness initiatives across the organization.

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Innovation

Network & Identity pilots 2024
In 2024, more than two pilot projects were conducted to test advanced 5G technologies with a particular focus on network reliability and security in high-demand environments:

Roskilde Festival pilot
A dedicated 5G Standalone (SA) solution was tested during Roskilde Festival. The solution provided the festival's operational teams with stable, secure, and prioritized network connectivity for selected devices such as smartphones, laptops, payment terminals, and IoT units throughout the entire event.

By separating traffic and ensuring controlled access, the solution minimized the risk of network congestion, cyberattacks, and unauthorized access — a key element in securing critical festival operations and digital infrastructure.

Parken pilot
A pilot project tested 5G millimetre wave (mmWave) technology at Parken Stadium, delivering ultra-high capacity and bandwidth in a dense environment. The solution also demonstrated how segmented, high-security network zones could be established to protect sensitive communication and digital transactions during major events. More about this project can be found in this [article].

These pilots highlight how dedicated and secure 5G network solutions can support not only large-scale events but also be applied to public safety, emergency response, and critical infrastructure protection.

The technology has the potential to be developed into a commercial product, ensuring that both private and public sectors can access resilient, high-security network infrastructure when needed. These solutions also demonstrated potential societal value beyond events, particularly in supporting emergency services and critical infrastructure.

Mobile Identity
A pilot project for a Mobile Identity solution is currently in the preparatory phase, led by *3* in collaboration with other Danish operators, and CKHGT's branch focusing on innovation development (IOD).

The pilot aims to establish a real-time verification system that links citizens' mobile phone numbers to a central database maintained by most of the Danish operators. This would ensure that critical service communications are always sent to the correct and most up-to-date mobile number, even when users change numbers.

We expect that a full-scale pilot could be realized in 2025 or 2026, pending regulatory and legal clarifications.

The initiative has received positive recognition from the financial sector, who has expressed interest in using the Mobile Identity solution, provided that outstanding legal questions around data usage and privacy can be resolved. The need for a solution like Mobile Identity is underscored by the increasing number of fraud cases in Denmark.

According to the Danish National Police (Rigspolitiet), reports of digital fraud have risen by over 30 % in recent years, with thousands of citizens affected annually.

Mobile Identity has the potential to contribute to reducing these numbers by improving the accuracy of digital identity verification — provided that the necessary legal framework is established to support the solution.

More about this initiative can be read in this [article].