

Consolidated Non-Financial Information Statement and **Sustainability** Information

MasOrange Group 2025

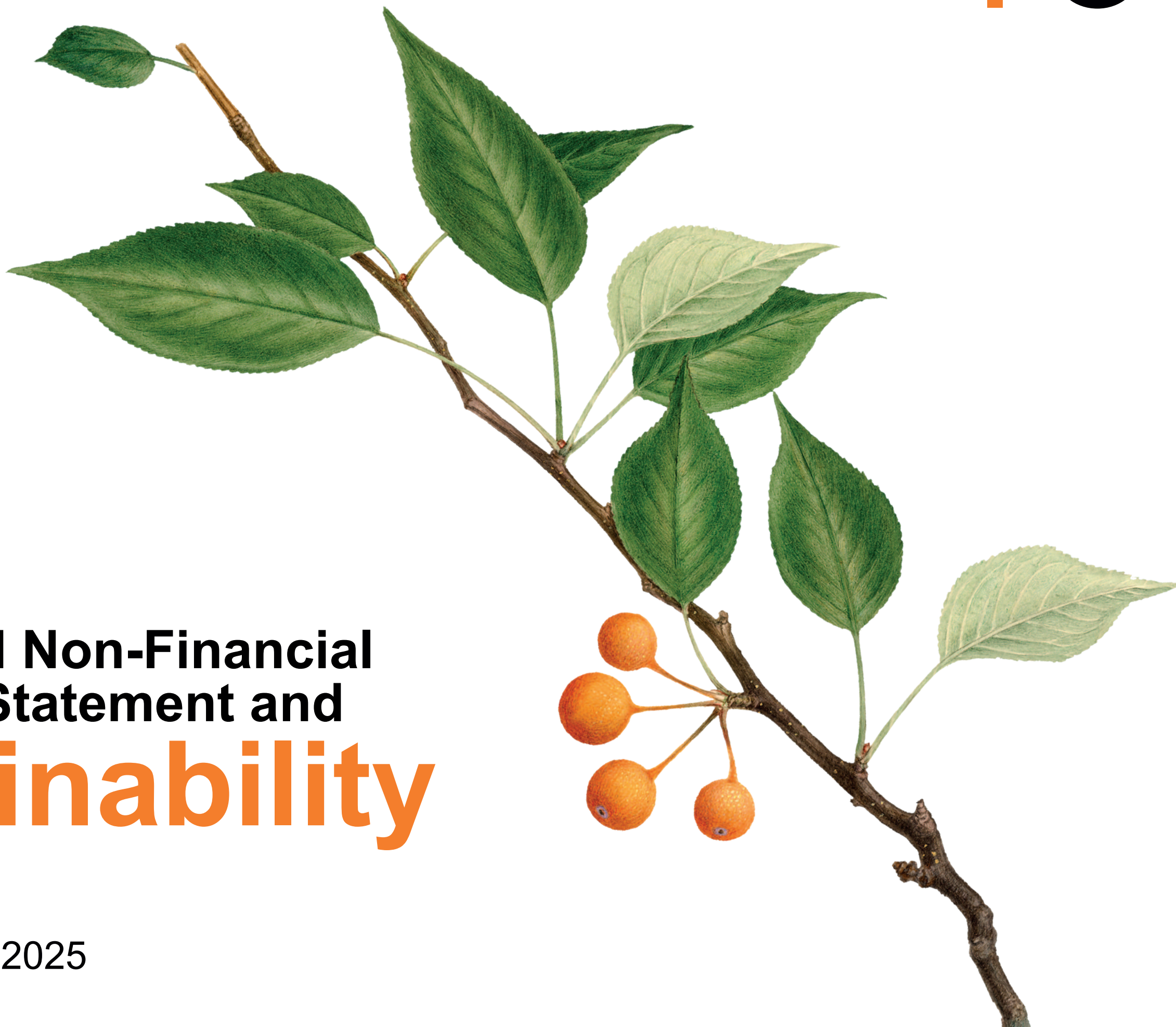


Table of Contents

Executive summary	4
1. General disclosures	7
General disclosures (ESRS 2)	7
Basis for preparation	7
Governance	11
Strategy	28
Impact, risk and opportunity management	53
2. Environmental information	67
European Union Taxonomy	67
Climate change (ESRS E1)	81
Resource use and circular economy (ESRS E5)	104
3. Social information	114
Own workforce (ESRS S1)	114
Workers in the value chain (ESRS S2)	147
Consumers and end-users (ESRS S4)	159
4. Information on governance	192
Business conduct (ESRS G1)	192
Appendix	214
Appendix I. Information on the data points covered in this Report	215
Appendix II. Table of contents Law 11/2018 and ESRS	233
Appendix III. Certifications	239
External Assurance	243



Executive summary

Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
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Executive summary

At MasOrange, 2025 has been a decisive year. A year that marks a before and after following the integration of Orange and MASMOVIL and confirms that our belief that leading with values, a long-term vision, and a customer focus is not only compatible with success, but is the foundation of sustainable growth. We have not only met the commitments made from day one; we have transformed them into results, tangible progress, and a different way of doing business, always offering the best experience to our customers. From day one, we assumed a set of clear priorities that continue to guide our decision-making and our way of growing. We summarize them into five major commitments — **Revenue, Investment, Innovation, Integration, and Impact** — which reflect our conviction that economic performance, social responsibility, and care for the environment must advance inseparably.

Today we can proudly affirm that these five commitments were not just a declaration of intent, but a reality that runs through our business, our culture, and our contribution to society.

We have demonstrated that it is possible to **generate revenue sustainably** in a context of intense competitive pressure and profound sector transformation. In 2025 we have continued to grow in customer base, revenue, and profitability consistently, consolidating ourselves as the operator with the largest customer base in Spain and the fastest-growing in Europe. These results are the product of the trust of our customers and partners, teamwork, rigorous execution, and a long-term vision that integrates economic growth and corporate responsibility.

This performance is also supported by **solid and sustained industrial investment**. We have allocated unprecedented resources to the deployment and improvement of our networks and services, convinced that secure and quality connectivity is essential for the economic and social development of the country. Our network strategy is also based on **efficiency and intelligent infrastructure sharing**, a strategic commitment that in 2025 materialized in the creation of PremiumFiber, the largest FiberCo in Europe in terms of customers.

This model allows us to maximize the impact of investment, reduce redundancies, and advance environmental sustainability. The expansion of 5G, the advance of fiber, and the exploration of new technological frontiers strengthen our capacity to anticipate the future and support customers, companies, and administrations in their own transformation.

Innovation has been another of the great drivers of the year. We have expanded our value proposition beyond connectivity, developing new services and businesses that respond to the real needs of our customers and society. Energy, Insurance, Alarms, and digital services and solutions that go beyond connectivity are already part of an ecosystem that allows us to diversify, generate new sources of growth and reinforce our resilience as a company.

In this area, the integration of artificial intelligence at the heart of our business and its pioneering use, supported by the most advanced analytics and the largest customer base in the Spanish market, has become a great competitive advantage for MasOrange.

All this has been built on a key element: **integration**. In 2025 we have advanced decisively in building a common culture based on collaboration, trust, and commitment. The signing of the Group's first labor agreement, the strengthening of the labor relations framework, and progress in cultural integration following the merger have been fundamental milestones to consolidate a shared project capable of driving operational excellence and innovation through people.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

As it could not be otherwise since it is part of our corporate DNA, our focus on customers has remained a priority. We have continued to improve their experience and satisfaction, raising levels of quality, reliability, and security in an increasingly demanding market. Because leading is not just growing in size, but doing so by offering excellent and close service every day.

In the **environmental** sphere, we have strengthened our commitment to climate action through the 2024–2040 Decarbonization Plan, aligned with the scientific criteria of the Science Based Targets initiative. The consolidation of 100% renewable electricity use in our operations, emission neutrality in our direct scopes, and progress in reducing emissions in the value chain reflect a climate ambition integrated into business management.

From the **social** dimension, we place people at the center of our growth model. We promote a safe, diverse, and inclusive work environment, supported by policies on equality, work-life balance, health, well-being, and talent development. At the same time, we drive **digital equality** as a motor of social cohesion, helping to reduce the digital divide and broaden access to opportunities in the digital environment, especially among groups and territories with greater difficulties.

These advances reflect responsible management based on solid, ethical, and transparent governance. Sustainability is part of our way of making decisions and creating long-term value, aligned with the main European regulatory frameworks and the Sustainable Development Goals.

All these achievements make us look to the future with ambition and responsibility. We want to keep growing, investing, and innovating, driving technological transformation — including artificial intelligence — and expanding our **positive impact** on the economy, society, and the environment. Because what we build today is not just a stronger company, but a business prepared to generate progress, opportunities, and trust in the long term.

That is the commitment we share and the footprint we want to leave.

Meinrad Spenger

CEO of the MasOrange Group

General disclosures





1. General disclosures

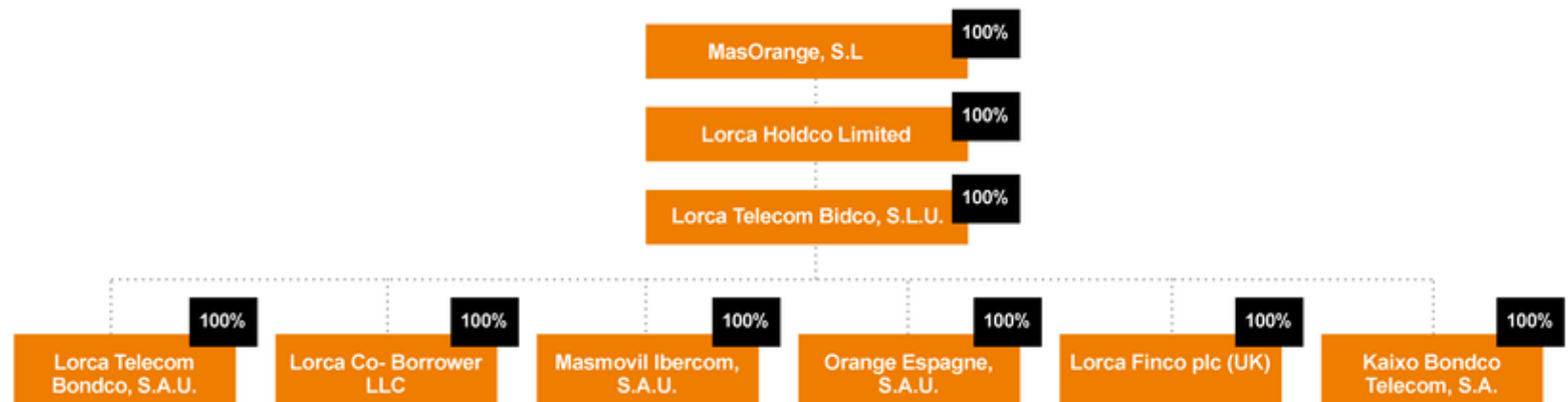
General disclosures (ESRS 2)

Basis for preparation

General basis for preparation of sustainability statements (BP-1)

MasOrange, S.L. is a sole-shareholder limited liability company (“sociedad limitada unipersonal”) with registered office in Pozuelo de Alarcón, Madrid (Spain). Its corporate purpose consists of providing telecommunications and information and communication technology services, among other activities. It is the parent company of the MasOrange Group in Spain as a result of the 2024 merger of two leading national telecommunications operators, Orange and MASMOVIL.

The purpose of this **Consolidated Non-Financial Information Statement and Sustainability Information** (the Report) is to provide a comprehensive, consolidated overview of the relevant environmental, social and governance matters of all the companies forming the MasOrange Group (MasOrange, the Group or the Company). The Report's scope matches the scope¹ of the Company's Financial Statements. For further information, see Appendix I to the Consolidated Annual Accounts (CAA). MasOrange's corporate structure, included in the scope of consolidation of this Report using the full consolidation method, is presented below:



¹ Under Law 11/2018, the subsidiaries of the MasOrange Group are exempt from preparing a Non-Financial Information Statement, as the information is included in this Sustainability Report.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
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MasOrange Group companies	% shareholding	XFERA MÓVILES, S.A.U. investee companies	
ORANGE ESPAGNE S.A.U. investee companies		Pepeworld, S.L.U.	100%
Masbusiness Infraestructuras, S.L.U.	100%	Embou Nuevas Tecnologías, S.L.U.	100%
Orange Espagne Distribución, S.A.U.	100%	Xtra Telecom, S.A.U.	100%
Orange España Virtual, S.L.U.	100%	Masbusiness FTTH, S.L.U.	100%
Suma Operador de Telecomunicaciones, S.L.U.	100%	Franquicia Tarifa, S.L.	100%
Orange España Servicios de Telemarketing, S.A.U.	100%	Masmovil Broadband, S.A.U.	100%
Jazzplat Colombia, S.A.S	100%	Spotting Bands Technologies, S.L.U.	100%
Jazzplat España, S.L.U.	100%	The Bymovil Spain, S.L.U.	100%
Orange Mediación de Seguros, S.L.U.	100%	Comlocal, S.L.	100%
PremiumFiber TopCo	59%	Masbusiness Advertising, S.L.U.	100%
MASMOVIL IBERCOM, S.A.U. investee companies		Masbusiness Digital Tech, S.L.U.	100%
Xfera Móviles, S.A.U.	100%	Masbusiness Scoring, S.L.U.	100%
Kaixo Telecom, S.A.U.	100%	Senior Telecomunicaciones y Servicios Avanzados, S.L.	82%
		Guuk Telecom, S.A.U.	100%
		Energía Colectiva, S.L.U.	100%
		Masmovil Mediación de Seguros, S.L.	100%
		Pepemobile, S.L.	10%
		Kaixo Telecom, S.A.U. investee companies	
		Euskaltel, S.A.U.	100%
		Masbusinessinnovations, S.L.	100%
		R Cable y Telecable Telecomunicaciones, S.A.U.	100%

This Report has been prepared in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council on Corporate Sustainability Reporting (CSRD) and Commission Delegated Regulation (EU) 2023/2772, which supplements Directive 2013/34/EU and contains the European Sustainability Reporting Standards (ESRS). It also meets the requirements of Law 11/2018 amending the Spanish Code of Commerce, the Consolidated Text of the Spanish Companies Act introduced under Royal Decree-Law 1/2010 of 2 July and the Audit Act in relation to non-financial information and diversity. In addition, the Report complies with Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 and related implementing regulations.

In line with the purpose of the regulations concerning transparency and reliability in sustainability, MasOrange's Report encompasses not only its own operations but also the upstream and downstream phases of its value chain. The structure established by the ESRS has been used to aid understanding of the content.

Disclosures in relation to specific circumstances (BP-2)

Time horizons

To prepare this Report and to identify impacts, risks and opportunities, MasOrange has used the time horizons defined by the ESRS, based on the following classification: short term (<1 year), medium term (between 1 and 5 years) and long term (>5 years).

The Group has also undertaken a climate risk analysis and a decarbonisation plan across the following time horizons:

Time horizons	Short term	Medium term	Long term
Decarbonisation plan	2030	2034	2040
Climate risk analysis	2030	2040	2050

Disclosure of estimated quantitative data

As regards the quantitative information reported, both on its own operations and for the upstream and downstream phases of the value chain, the Company has estimated the following requirements:

- **Power consumption:** To ensure the completeness and consistency of the annual information, in cases where the electricity bills for the final months of the financial year are not available, MasOrange has made an estimate at the Report issuance date based on historical consumption. This approach provides an accurate, seamless overview of energy performance for all 12 months of the year.
- **Fuel consumption:** Similarly, as fuel bills are not available at the year-end, consumption for these periods has been estimated using verified prior-year data. This methodology facilitates comprehensive, consistent full-year reporting while ensuring the traceability and quality of energy data.

Referenced data

Information referring to the Consolidated Annual Accounts (CAA) has also been included, in line with the disclosure requirements described below:

- ESRS 2 IRO-1 of E1 (data point RA 15) related to the financial implications of climate risks.
- E1-3 (data point RD 29c) related to the European Union Taxonomy.

It should be noted that the Group presents comparative information for 2024 where required by Law 11/2018 on non-financial information and diversity, which also requires the disclosure of information not covered by ESRS, which MasOrange includes in this Report.

The Report also contains details that must be disclosed under other applicable EU regulations. The list of data points included in the Report and the topics arising from other EU legislation can be consulted in Appendix I.

Additionally, this Report covers all mandatory standards shown to be material to the Company based on its Double Materiality analysis, with the exception of the following Disclosure requirements: E1-9: Anticipated financial effects of material physical and transition risks and potential opportunities related to climate change; E5-6: Anticipated financial effects of material risks and opportunities related to resource use and the circular economy; and S1-7:



Characteristics of non-employee workers in the company's own workforce, with the exemptions set out in Appendix C of ESRS 1 for companies with fewer than 750 employees not being applicable.

Methodological adjustments made with respect to the previous period

MasOrange has adjusted the Scope 3 figure for the 2024 financial year due to the update of emission factors and a scope change in category 1 of that scope. For further information, see the section "Gross scopes 1, 2, 3 and total GHG emissions (E1-6)".

Resources devoted to actions

MasOrange boosts its environmental, social and governance pledge by earmarking financial resources and organisational capabilities to foster actions in each material area identified. As described in the relevant chapters, these actions are implemented following corporate policies and management systems that ensure alignment with the European Sustainability Reporting Standards (ESRS). Bearing in mind the financial materiality threshold analysis defined by the financial team responsible for the CAA audit, this Report will only include investments and expenses (CapEx and OpEx) that individually exceed the established thresholds, on the understanding that lower amounts do not have a material financial effect for CSRD purposes.

For non-financial resources, MasOrange has specialised teams that lead the ongoing management of material topics and dialogue actively with stakeholders. These areas oversee deployment of initiatives, assess progress and ensure consistency between corporate commitments, identified risks and opportunities, and the Group's strategic objectives. Their work is key to ensuring robust implementation and compliance with European sustainability standards, particularly in governance, impact management and indicator monitoring.



Governance

The role of governing bodies (GOV-1)

The Company's main governing bodies are the General Shareholders' Meeting, the supreme decision-making body representing all its shareholders, and the Board of Directors, the body responsible for managing and representing the Company.

Composition of the Board of Directors and Board committees

At 31 December 2025, MasOrange's Board of Directors² comprises 8 members and a non-voting secretary, as shown below:

Board director	Type
Meinrad Spenger	Executive (CEO)
Laurent Vincent Joseph Martínez	Nominee Non-Executive Chair
Mari-Noëlle Jégo-Laveissière	Nominee
Ignacio de Orúe Sabau	Nominee
Miguel Juan Segura Martínez	Nominee
Iñaki Cobo Bachiller	Nominee
Robert Sudo	Nominee
Matthieu Bouchery	Nominee
Alberto Castañeda González	Non-voting Secretary

In 2025, 1 executive Board member (12.5%) and 7 non-executive Board members (87.5%) were nominee directors for MasOrange. The Board of Directors currently includes no independent directors.

The Board's composition changed twice in 2025 to fill vacancies following the resignation of María Berta Durán Pérez from her office as nominee director on 23 January 2025, replaced by Ignacio de Orúe Sabau, and of Jean-François Fallacher from his office as nominee director and non-executive chairman on 14 May 2025, replaced by Matthieu Bouchery and Laurent Vincent Joseph Martínez, respectively.

In 2025, MasOrange's Board of Directors met 16 times (including 5 times in writing without a meeting) to discuss various matters related to the Group's organisation and internal functioning, strategy and objectives, corporate operations, approval of the budget and business plan, internal control and risk management policy, among other Board-specific aspects.

² MasOrange's administrative, management and supervisory bodies have no members directly representing the Group's employees.



The members of MasOrange's Board of Directors have solid, proven experience in the telecommunications industry, among other sectors.

Directorship types

- **Executive director:** a Board member who, besides director duties, is involved in the Company's daily activities, performing senior management tasks, or is a Company or Group employee.
- **Nominee director:** a Board member due to being a Company shareholder or holding a significant interest in share capital. They may sit on the board directly or through a representative.
- **Independent director:** a Board member who must carry out his or her duties without being influenced by any relationship with the Company's management team or controlling shareholders. They are chosen on the basis of personal and professional circumstances. An independent director's mission is essentially to defend the interests of all shareholders and particularly minority shareholders that have no access to a position on the Board.

Appointment, requirements and term of office

MasOrange's Bylaws state that the power to appoint directors lies with the General Meeting, with no exceptions other than those laid down by law. Directors' appointments will take effect as soon as they accept and must be entered in the Commercial Register.

Shareholder status is not necessary to be appointed as a director. If a legal entity is appointed as a director, it must designate a single natural person to permanently perform the duties of office. Representative status cannot be revoked by the legal entity director until it designates a replacement.

The Company's directors hold office for an open-ended period and may be removed from office at any time by the General Meeting, even if it is not on the agenda.

Board experience

The members of MasOrange's Board of Directors have solid, proven experience in the telecommunications industry, among other sectors. This specialised knowledge assures an in-depth understanding of both the functioning of the market and the particularities associated with the Group's various products and services. The experience gained throughout their professional careers is essential when making appropriate strategic and operational decisions in the Company's competitive, changing environment.

This experience spans the geographic locations where the Company operates, both nationally and internationally, bringing a global, integrative vision to ensure that MasOrange's strategy is specifically adapted to the market.

To properly perform their duties in all areas required by the current business environment, MasOrange's Board members have a solid knowledge base in sustainability. This knowledge allows directors to adapt to the challenges and demands of environmental, social and governance matters, which are fundamental in the telecommunications sector and key to the Company's strategic development and contribution to the development of the digital world.

The directors also have permanent access to relevant, up-to-date information on environmental, social and governance aspects, both internally (specific training, communiqués and information sessions organised by the Company itself) and externally (conferences, seminars and industry events). This approach enables Board members to constantly refresh their sustainability training, thus ensuring appropriate decision-making and compliance with best practices in this area.

**Auditor's attendance at Board and Audit and Risk Committee meetings**

The auditor was asked to attend 1 Board meeting in 2025. It was also invited to and attended 4 meetings of the Audit and Risk Committee.

Board Committee composition

MasOrange has the following two Board committees:

- 1. Audit and Risk Committee**, the advisory committee responsible for supervising:
 - a. The quality, accuracy and integrity of the financial reports of the Company and its subsidiaries, and the adequacy of related information;
 - b. Compliance by the Company and its subsidiaries with internal control and risk management policies and procedures, including the adequacy and effectiveness of such controls, policies, procedures and programmes, taking into account applicable legislation and business risks, and ensuring that they are effective and comply with international standards, considering suitability for the Company and its size, risks and business activity, and spanning both financial and non-financial risks;
 - c. Internal and external audit functions;
 - d. Examination of sustainability matters affecting the business model and strategy of the Company and its subsidiaries;
 - e. Systems for monitoring the sustainability management and performance of the Company and its subsidiaries, in accordance with applicable law, regulations, regulatory requirements and international standards;
 - f. Review of mergers, acquisitions and investment operations;
 - g. Investigations into infringements of ESG laws or regulations reported by the Chief Compliance Officer, together with ESG standards and/or policies, management systems and plans.
 - h. The Audit and Risk Committee is formed by the following Board members: Mari-Noëlle Jégo-Laveissière, Robert Sudo, Iñaki Cobo Bachiller, Matthieu Bouchery and Alberto Castañeda González (Non-Voting Secretary). Eight meetings were held in 2025 (2 in writing without meeting).
- 2. Remuneration Committee**, the advisory committee responsible for:
 - a. Adopting or modifying compensation policies for the Chief Executive Officer and members of the management team;
 - b. Material conditions of employment of the persons appointed to the management team; and
 - c. Changes to the material conditions of employment (including compensation) and pension plans or lay-off proceedings (ERE) to be applied to the Company and its subsidiaries.

The Remuneration Committee is made up of the following Board members: Laurent Vicent Joseph Martínez, Robert Sudo, Miguel Juan Segura Martín, Ignacio de Orúe Sabau and Alberto Castañeda González (Non-Voting Secretary). It met 6 times in 2025.

[Executive summary](#)[General disclosures](#)[Environmental information](#)[Social information](#)[Information on governance](#)[Appendix](#)

MasOrange's ESG Governance

Governance Bodies

Supervision
Execution

Annual Review Cycle
by Board of Directors/
Committee

Quarterly Review
by CEO and ESG
Committee

25
ESG Policies
approved by
the Board of
Directors

Sustainability Strategy

- Bylaws that recognize triple impact.
- Double materiality: positive and negative impacts, risks and opportunities (IROs).
- 360° ESG Strategy based on six material business pillars
- ESG Plan with Objectives and Key Results.

Management of Environmental, Social and Governance Risks

- Climate risks and Adaptation plan.
- Resilience and Business continuity.
- Cybersecurity and Data Privacy.
- Human Rights and Due diligence along the Supply chain.

Transparency and Sustainability Reporting

- Non-Financial Information Report / Sustainability Report (Law 11/2018, ESRS and Taxonomy).
- Internal Control over Sustainability Reporting (ICSR).
- External verification.
- Positive Impact Measurement Report.
- ESG ratings assessment.

Stakeholder Alignment

- Dialogue with stakeholders.
- Purpose, values, culture and ESG training.
- Incentives linked to ESG performance.
- Commitments to stakeholders: clients, suppliers, employees, administrations, civil society, etc.
- ESG goals linked to the SDGs.

Strategic pillars

Secure connectivity and
Customer experienceDigital
EqualityEnergy and
Climate ChangeCircular
EconomyCulture
and TalentGovernance and
Business Ethics

**Diversity on the Board of Directors and Board committee**

The gender, age range and nationality of the Board and committee members are set out below:

Gender diversity		
	Men (%)	Women (%)
Board of Directors	87.5%	12.5%
Audit and Risk Committee	75.0%	25.0%
Remuneration Committee	100.0%	—%

Age range diversity			
	Over 50 (%)	30 to 50 (%)	Below 30 (%)
Board members	62.5%	37.5%	—%

Diversity of nationalities				
	Spain (%)	France (%)	Germany (%)	Austria (%)
Board members	37.5%	37.5%	12.5%	12.5%



Management Committee composition

MasOrange's main management and administration body is the Management Committee, which is responsible for defining and guiding the Company's overall strategy, and for ensuring that strategic objectives are met and are consistent with the corporate mission, vision and values. Its main functions include approving infrastructure investments, evaluating and arranging commercial and technological partnerships, and overseeing performance in each area. It also ensures the coordination and alignment of actions across all units, promoting efficient, robust business execution while continuing to contribute to an inclusive, sustainable connected future.

The Management Committee has the following members:

Member	Area
Meinrad Spenger	Chief Executive Officer
Ludovic Pech	Chief Financial Officer
Germán López	Chief Operating Officer
Miguel Santos	Chief Technology Officer
Mónica Sala	Chief Network Officer
Mireia Vidal	Chief People Officer
Julio Gómez	General Manager, Strategy and Wholesale
Antonio García	General Manager, Legal and Assurance
Luz Usamentiaga	General Manager, Regulation, Public Affairs and Sustainability
Miguel Ángel Suárez	General Manager, Customer experience - Cockpit
Pablo Freire	General Manager, Corporate Development and Transformation
Joaquín Colino	General Manager, B2B
Ravín Dhalani	General Manager, IT
Víctor del Pozo	General Manager, Innovation, Partnerships and New Services
Jacobo Gálvez	General Manager, Marketing and TV
Ignacio López	General Manager, Customer Operations
José Carlos López-Tello	General Manager, Sales and Distribution
Manuel Sánchez	General Manager, Financial Transactions
Javier Serra	General Manager, Customer Strategy and Analysis
Patricia Alonso	General Manager, Logistics, Last Mile and Migrations



Information provided to and sustainability matters addressed by the undertaking's governing bodies (GOV-2)

Responsible management approach

MasOrange understands sustainability as a fundamental, inseparable aspect of its business activity. The Company therefore focuses on creating long-term sustainable value, prioritising environmental protection, social development and business ethics, all under the principles of transparency and good corporate governance, led by the **Board of Directors**.

The **Bylaws**, approved by the General Shareholders' Meeting in March 2024, explicitly establish in Article 2 the Company's commitment to generate a positive social impact.

"In pursuing its corporate purpose, the Company will ensure the creation of sustainable value and generation of a positive social impact for itself by engaging in the activities included in the said corporate purpose, taking into consideration the other stakeholders related to its business activity and institutional reality, the people linked to it, the environment and good governance and corporate governance practices."

MasOrange has various bodies responsible for sustainability, with functions that vary depending on their nature and scope of action.

Areas responsible for sustainability reporting to the Board

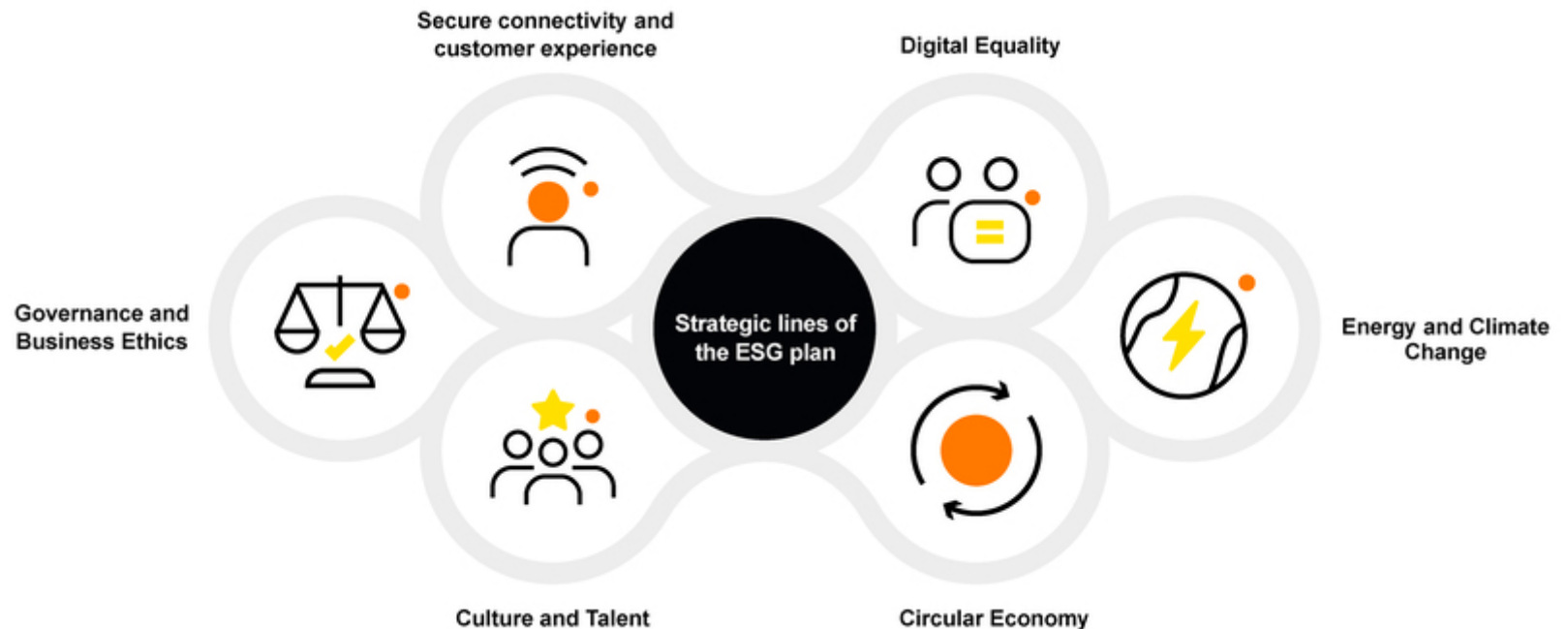
Under the Group's **ESG (Environmental, Social and Governance) Policy**, reviewed by the Audit and Risk Committee and approved by the Board of Directors in October 2024, ultimate responsibility for this matter lies with the **Board of Directors** itself and MasOrange's **CEO**, who acts as the ESG Board director. The **Audit and Risk Committee** performs a supervisory function, delegated by the Board of Directors, as laid down in Article 5.2 of the Committee Regulations.

The Board receives regular reports from the **Regulation, Public Affairs and Sustainability Department** on environmental, social and governance matters. At least once a year, the Board analyses and reviews environmental, social and governance aspects, such as the ESG Policy and Strategy, as well as preparing and presenting the Sustainability Report for the previous financial year, together with the Company's annual financial statements. Board directors also receive periodic training and information on ESG matters and their own responsibilities, including regular monitoring of environmental indicators. The Board evaluates the outcomes and effectiveness of the policies, actions, targets and metrics arising from the responsible management process required by the European Sustainability Reporting Standards, thereby bolstering oversight of the Company's ESG performance.

The Articles of Association explicitly set out the Company's commitment to generating a positive social impact for all stakeholders.



The CEO leads ESG management, following the guidelines of the **ESG Strategic Plan** presented to the Board in October 2024 and reviewed annually. This plan defines the Group's pledge to create sustainable value, reduce risk and ensure positive impacts. It includes specific actions, metrics and targets that are communicated transparently. In the event of an update, the most relevant targets and metrics are reviewed and reported, in line with the Group's strategic pillars:



Integration of impacts, risks and opportunities into oversight and decision-making by governing bodies

Responsibility for ESG management within MasOrange is integrated across the entire organisation and the various business lines under the supervision of the Board of Directors and the management of the Chief Executive Officer, while the Audit and Risk Committee is responsible for control. MasOrange also has a robust, well-defined **governance model** in place that provides specific mechanisms and controls to identify, manage and monitor sustainability matters, paying particular attention to material risks, opportunities and impacts (IROs).



MasOrange has an ESG Committee chaired by the CEO and formed by Management Committee members. It meets quarterly to make key decisions, oversee ESG strategy and evaluate outcomes. The CEO chairs the Group's ESG Committee to ensure his direct involvement in the management and monitoring of strategic sustainability issues. In 2024, the double materiality analysis was presented to the Committee, including input from the CEO, CFO and other members of the management team. This process provided a comprehensive view of the material impacts, risks and opportunities for the Group and was the basis for defining and updating the ESG Strategy. For further information, see the section "Material impacts, risks and opportunities and their interaction with strategy and business model(s) (SBM-3)" in this chapter.

MasOrange conducts an annual review of material topics, the findings of which are reported to the Management Committee through the ESG Committee. The ESG Strategy goals are also assessed on a regular basis using the findings of the double materiality analysis updated in 2025 as a reference.

A key, distinctive aspect of MasOrange's management approach is the existence of the **ESG Community**. This multidisciplinary community, coordinated by the ESG area, is made up of specialists from different areas of the Company, such as People, B2B and B2C Business, Customer Service, Technology, Networks, Logistics, Innovation, Legal, Compliance and Finance, among others. Its main objective is to identify and manage economic, social and environmental aspects that affect the entire organisation in an agile, cross-cutting way.

The members of the ESG Community act as drivers of change, promoting the transition to an organisational culture focused on sustainable impact. They are responsible for leading strategic projects, gathering relevant data and reporting key indicators for the preparation of the Sustainability Report, thus ensuring compliance with strategic sustainability objectives.

At the operational level, each impact, risk or opportunity is managed by the departments represented on the ESG Committee, as well as by the ESG Community leaders, who are experts in the matters identified as priorities through the double materiality analysis.

Finally, the ESG, Sustainability and Foundations Department is responsible for leading and coordinating the organisation's environmental, social and governance initiatives, ensuring the effective embedding of sustainable practices into operational activities, ongoing dialogue with stakeholders, leadership in impact measurement and preparation of the Sustainability Report.

Integration of sustainability-related performance in incentive schemes (GOV-3)

Directors' remuneration policy

The Board of Directors recognises transparency in all its actions, including directors' remuneration, as one of the key elements of the corporate governance strategy.

Article 25 of the Bylaws states that a directorship is not remunerated, although directors who are appointed as chief executive officers or assigned executive functions by any other means will be entitled to receive remuneration for the performance of their executive functions.

Incentive systems

MasOrange has an annual incentive scheme for employees and promotes corporate objectives, aligning management bodies and teams with the business strategy and long-term sustainable value creation.

The approval process begins with a proposal drawn up by the CEO together with the Management Committee, which is then ratified by the Board through the **Remuneration Committee**.

In 2025, sustainability-linked targets accounted for 20% of variable compensation and were therefore taken into account as benchmarks for the Company's performance. Targets include metrics related to the continuous improvement of our customers' experience, consolidation of the corporate culture and findings of assessments by international ESG rating agencies, which evaluate achievements and goals in environmental, social and governance matters:

- **Environmental impact:** carbon emissions, energy efficiency, resource use and impact on biodiversity.
- **Social responsibility:** working conditions, diversity and inclusion, connectivity, customer satisfaction, cybersecurity, data security, social development and responsible production.
- **Corporate governance:** governance approach, transparency, ethical standards, risk management and remuneration policy.

The Company also has a long-term incentive system in which 20% of the objectives are tied to ESG performance.

Statement on due diligence (GOV-4)

MasOrange has a continuous due diligence process based on its ESG Strategic Plan, which was built on the double materiality analysis³. This approach allows it to identify, prevent, reduce, eliminate, mitigate and remedy the current and potential adverse impacts and risks that its operations may represent for society and the environment.

This process is aligned with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, providing a solid framework for assessing sustainability impacts, risks and opportunities.

Although the ESRS do not establish specific behaviours, they do require disclosure of how the undertaking embeds due diligence in its governance, strategy, business model, stakeholder relations, impact management and assessment of the effectiveness of measures adopted, in accordance with the General disclosures standard (ESRS 2) and the other thematic standards.

The following table provides cross-references to other disclosure requirements in the Report, which expand on key aspects of the due diligence process in the environmental, social and governance areas.

³ For further information, see the section "Strategy, business model and value chain (SBM-1)"



Essential elements of due diligence	Report sections
a) Embedding due diligence in governance, strategy and the business model	- Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies (ESRS 2 GOV-2). - Integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3). - Material impacts, risks and opportunities and their interaction with strategy and business model(s) (ESRS SBM-3).
b) Engaging with affected stakeholders in all key steps of the due diligence	- Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies (ESRS 2 GOV-2). - Interests and views of stakeholders (ESRS 2 SBM-2). - Description of the processes to identify and assess material impacts, risks and opportunities (ESRS 2 IRO-1). - Corporate policies (ESRS 2 MDR-P). - The thematic ESRS reflect the different stages and objectives of collaboration with stakeholders throughout the due diligence process.
c) Identifying and assessing adverse impacts	- Description of the processes to identify and assess material impacts, risks and opportunities (ESRS 2 IRO-1). - Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS SBM-3).
d) Taking actions to address those adverse impacts	- Actions (ESRS 2 MDR-A). - The thematic ESRS reflect the range of actions and include action plans to address material impacts.
e) Tracking the effectiveness of these efforts and communicating	- Metrics (ESRS 2 MDR-M). - Targets (ESRS 2 MDR- T). - The thematic ESRS reflect the corresponding metrics and targets.



Risk management and internal controls over sustainability reporting (GOV-5)

MasOrange considers it essential to stay up to date and comply with the guidelines of the authorities that regulate and supervise its operations. So the Group has various internal control and risk management mechanisms in place to ensure the Company's integrity and security. It also has an Internal Control over Sustainability Reporting (ICSR) system guaranteeing the quality, traceability and reliability of the information reported.

Internal control and risk management systems

Lines of defence

As laid down in the Spanish Companies Act, the Board's non-delegable functions include “determining the risk control and management policy, including tax risks, and overseeing the internal information and control systems”.

The Group's Board of Directors relies not only on committees but also on a three-lines-of-defence approach. A clear, efficient system that optimises internal communication on risk management and control is implemented by accurately defining roles and responsibilities so as to ensure the continued success of initiatives in this area.

First line of defence

The first line of defence comprises the functions responsible for processes that involve risk-taking. These areas include Finance, IT, Network and the Business Units, which are responsible for:

- Nurturing an environment that allows activities or events that could trigger potential risks to be identified, along with their main features, such as impact and probability.
- Developing activities and mechanisms to control and mitigate the risks identified.
- Putting the appropriate devices in place to track and monitor the risks identified.
- Establishing communication mechanisms with senior management and the second line of defence.

Second line of defence

The second line consists of assurance areas such as Internal Control, Risk and Compliance; Legal; Data Protection Office; Competition Compliance; Physical Security and BCM; Cybersecurity; Fraud Prevention; and Revenue Assurance, among others. The main functions of this second line of defence are:

- Establishing MasOrange's risk management and control policy and regulatory framework.
- Monitoring and ensuring proper risk management and control in all the operating areas.
- Promoting a risk culture in the Group.



- Reporting to senior management and the Board, through the Audit and Risk Committee, on the status of the various risks identified by the Company, as well as the mitigating measures taken to manage them.

Third line of defence (Internal Audit function)

The Internal Audit Department, reporting to the Audit and Risk Committee, performs an independent, objective review of the first two lines of defence to detect any control weaknesses and offer improvement recommendations.

The Internal Audit Department's functions include:

- Preparing an annual risk-based internal audit plan, taking account of contributions made by the Audit and Risk Committee and senior management.
- Discussing, reviewing and approving the plan with the Audit and Risk Committee and senior management.
- Adjusting the audit plan in response to changes in the MasOrange Group's business, risks and operations.
- Ensuring that internal audit work is carried out in accordance with the Global Internal Audit Standards.
- Monitoring and confirming the implementation of recommendations, reporting outcomes to the Audit and Risk Committee and senior management.
- Ensuring that the audit team has the necessary competencies by means of a quality assurance and improvement programme.
- Identifying emerging trends that may affect the Group and reporting them to management.
- Reporting on any impediments to the department's independence.

Direct reporting to the Board of Directors and Board committees

The three-lines-of-defence approach includes various functions that report directly to both the Board of Directors and the Board Committees. They are the Internal Control and Risk Director, the Data Protection Officer (DPO) and the Internal Audit Director. This allows direct, effective reporting of risks faced by the Group and of the corrective action plans and mitigating measures implemented.

Risk management

MasOrange's Board of Directors is ultimately responsible for risk management. To promote oversight in this area, in 2024 the Board approved the Group's Risk Control and Management Policy, thanks to which all actions to control and mitigate risks identified at a given time are determined. These actions are implemented through a Comprehensive Risk Control and Management System based on the COSO (Committee of Sponsoring Organisations of the Treadway Commission) model, enhancing the Company's ability to manage scenarios of uncertainty, as a continuous cycle consisting of the following five phases:

**Identification of risks in line with the Group's strategies****Risk assessment and quantification****Design and implementation of the risk management system****Continuous monitoring / updating of the Risk Map****Reporting to the Audit Committee / Board of Directors**

The Group's activities expose it to risks inherent to the industry, the macroeconomic environment, the regulatory framework and operations that have to be identified and controlled through the risk management systems established by the Company. The Company is generally subject to financial and credit, compliance, strategic, operational and technological risk factors.

In general, significant risks are those that have a medium-high impact and probability of occurrence, or any internal or external contingency that, if it materialises, would prevent or hinder the achievement of the Group's strategic objectives.

MasOrange's risk control and management approach is based on the continuous review and updating of the corporate risk map, which has been designed in line with the Group's strategies. Once the risks have been identified and quantified, the necessary action plans to mitigate them are drawn up, approved and assigned. The Risk Control and Management Policy states that the Internal Control, Risk and Compliance Department is responsible for updating the Risk Map at least once a year and arranging the necessary action plans, as described below, assigning a "risk owner" in each case.

Main risks identified and strategies implemented

- Cybersecurity risks. They have been mitigated by obtaining ISO 27001 and National Security Scheme certifications, and by continuously improving detection and prevention mechanisms, among other measures.
- Business continuity risks, which have been mitigated by obtaining ISO 22301 certification thanks to a new business continuity governance approach, a crisis committee and the unification of the various incident resolution processes.
- Risks of penalties and reputational damage due to non-compliance with privacy regulations. They have been mitigated by obtaining ISO 27701 certification and implementing a robust data governance system.

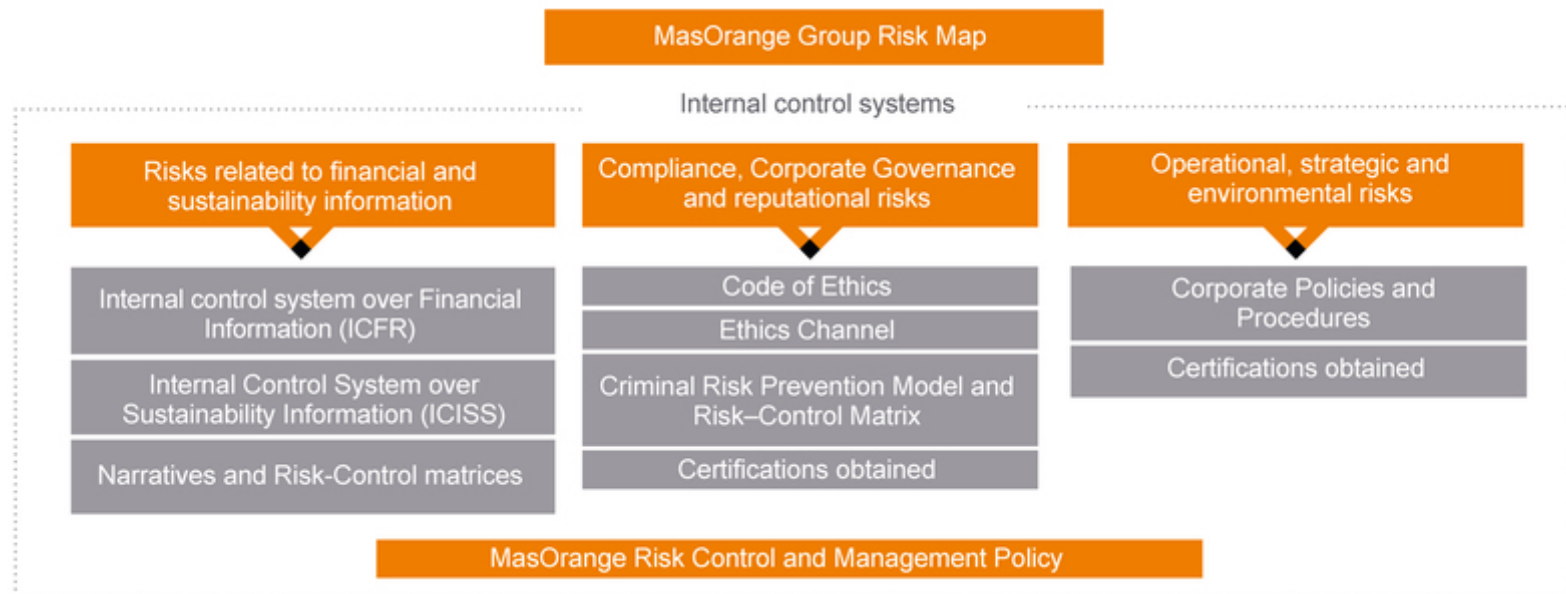


- Risks arising from the dispersion of IT systems, which have been mitigated using information aggregators for consolidation processes and through the system unification project, among other measures.
- ESG-related operational and reputational risks. These risks have mainly been mitigated by means of the regulatory compliance GAP analysis, as well as obtaining various certifications and defining the ESG governance model. The Internal Control area is responsible for both designing and overseeing implementation of the Internal Control System, supported by all the other areas of the Group. The Internal Control function, in collaboration with the other second- and third-line functions, will ensure the effectiveness of the Internal Control System.

It should be noted that although many of these risks could have a significant impact on the Group's operations, probability of occurrence is considered medium/low thanks to the control mechanisms implemented by MasOrange, as well as the mitigation measures put in place, which have kept the impact and probability of occurrence within the Board-approved tolerance levels.

One of the system's main objectives is to ensure the proper flow of information and reporting on corporate risks to the bodies responsible for controlling them: the Audit and Risk Committee and the Board of Directors. So, once the annual risk identification and assessment process and risk map updating has been completed, the work carried out, including the risk map and the mitigation measures implemented, is presented to the Audit and Risk Committee and the Board.

The **internal control system** is described below:





Internal Control over Sustainability Reporting (ICSR) system

In 2025, MasOrange undertook a process to implement the ICSR, which guarantees the reliability, integrity and transparency of sustainability reporting. It is based on the COSO (Committee of Sponsoring Organisations of the Treadway Commission) conceptual framework and has synergies with the Internal Control over Financial Reporting (ICFR) system.

The ICSR system encompasses five key components: control environment, risk assessment, control activities, information and reporting, and oversight, applied specifically to the sustainability context. Its scope spans all processes related to the collection, preparation and reporting of ESG information.

This system also addresses the risks associated with sustainability information, which are understood to be events that may affect the integrity, accuracy and completeness of the sustainability data set out in this Report.

The risk assessment and prioritisation methodology employed in the ICSR system entails identifying the risks inherent in the processes of generating, consolidating and reporting sustainability information, assessing them based on criteria of probability and impact on information quality and, as a result, prioritising them so as to define effective controls. This approach is aligned with the COSO best practices and with the assertions of the Spanish National Securities Market Commission (CNMV) (existence, completeness, accuracy, presentation and disclosures), and includes design, implementation, monitoring and periodic updating of the Risk Map phases, as well as regular reporting to the bodies responsible for control.

The risks identified and the measures implemented to mitigate them are described below:

1. Misinterpretation of sustainability regulations: To mitigate this risk, ongoing training has been provided, policies have been updated in line with regulatory changes (CSRD and ESRS) and reviews have been carried out by legal and sustainability experts.
2. Use of incorrect variables or incomplete information: Automatic and manual review controls are applied to information sources, coupled with periodic reconciliations and traceability in ITGC (information technology general control) systems to ensure data reliability.
3. Inaccurate calculations in indicators: This is controlled by automating calculations, standardising definitions of variables and metrics, and establishing detective or data validation controls in the Workiva system prior to reporting.
4. Absence of adequate controls or insufficient segregation of **duties**: Preventive and detective controls, segregation of functions in information systems and continuous monitoring of access and privileges are in place.
5. Technological or cybersecurity risks: They are managed through ITGC controls (security, backup, access and recovery), system audits and the protection of data integrity and confidentiality.
6. Misalignment between financial and sustainability information: This risk is mitigated by means of joint review processes performed by the Finance and Sustainability Departments, consistency and reconciliation controls, and oversight by the Board of Directors to ensure consistency and transparency.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
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The results of the ICSR risk assessment are directly integrated into the sustainability information disclosure process, ensuring that reports reflect reliable, complete, consistent data. The findings and weaknesses identified in the assessment allow policies, indicators and controls to be adjusted, ensuring that the most relevant aspects are correctly reflected in this Report. Recommendations and action plans are also integrated into continuous improvement processes, enhancing the quality and traceability of the information published. This approach allows management and the Audit Committee to rely on the effectiveness of internal control and thereby ensure that the information published complies with applicable regulations and sustainability standards.

The regular reporting of risk assessment findings in the ICSR takes the form of reports prepared by the Internal Control, Risks & Compliance Department, as indicated in the annual review plan. These reports include the review results, findings identified, risk assessments (high, medium or low) and recommendations and action plans proposed by the areas responsible.

Relevant conclusions and deficiencies are formally communicated to senior management and the Audit Committee for awareness and monitoring. In parallel, the status of recommendations and action plans is permanently monitored. This process ensures that the risks identified are properly managed and that the Internal Control over Sustainability Reporting system remains effective and reliable over time.



Leaders in customers, with 43 million fixed, mobile, and M2M lines

Strategy

Strategy, business model and value chain (SBM-1)

MasOrange Group's business model

MasOrange is the leading operator in the Spanish telecommunications market in terms of customer numbers and satisfaction, resulting from the joint venture between Orange Spain and MASMOVIL completed in 2024. The Group provides fixed and mobile telecommunications, broadband, television, interconnection and roaming services, as well as complementary digital services, such as energy, insurance, cybersecurity, health, consumer finance, retail media and cloud solutions, IoT and artificial intelligence, serving all market segments through a multi-brand strategy with eight national and five regional brands.

MasOrange has also promoted a 100% green energy line that it offers to customers, in line with its commitment to reduce greenhouse gas emissions.

MasOrange's business model is based on an extensive fixed and mobile network infrastructure enabling a high-quality connectivity offering throughout the country. The Company serves 43 million customers⁴, including over 32 million marketable households through fibre optics, covering 99% of Spain's population with its 4G mobile network and 93% with the new 5G technology, connecting more than 4,000 municipalities throughout Spain.

The corporate strategy has a clear purpose —(Re)connecting people by leveraging technology in the interests of the best possible experience— and a vision of leading the field in customer satisfaction, talent and positive impact. This strategic orientation is driven by a set of corporate values that guide decision-making: customer first, positive attitude, pragmatism and collaboration.

From the get-go, MasOrange has defined a long-term strategic roadmap to consolidate industrial leadership and social impact, based on three main vectors:

1) Leadership in digital infrastructure and customer experience

- Sustained investment in next-generation networks (FTTH, 5G SA) and new services, with €1.2 billion allocated to innovation, enhanced coverage and connectivity.
- Multi-brand strategy to serve all segments: premium, price, international, digital and rural.
- Incorporation of digital solutions to heighten competitiveness, operational efficiency, security and data protection, as well as high-value-added services such as energy, cybersecurity, alarms, health, insurance and advertising, boosting the value proposition for businesses.

2) Embedding sustainability in the corporate strategy

The ESG Policy embeds corporate responsibility in the business model and establishes a long-term commitment to creating positive impacts, sustainable value and risk reduction. The ESG Strategic Plan grounds the strategy in six priorities linked to the impacts, risks and opportunities identified in the double materiality analysis. They include:

- Commitment to full decarbonisation by 2040, after achieving Scope 1 and 2 neutrality in 2023, and consolidating the use of renewable energy.

⁴ MasOrange's customers may be broken down into 26.2 million mobile lines, 7.1 million fixed lines and 10.6 million M2M lines.



- Circular economy, maximising the useful life of equipment through reconditioning, reuse and eco-design.
- Secure, accessible connectivity, particularly in rural areas and for vulnerable groups.
- Ethical governance and responsible supply chain management.

3) Creating value for society and the environment

The Group's activities had a significant positive impact in 2025, measured using a methodology developed in association with Harvard University and aligned with ESG criteria. This analysis has become a strategic tool for guiding investment, innovation and deployment decisions, favouring the embedding of sustainability into corporate strategy. For the economic impact and further details on this analysis, see the MasOrange Group's Social and Environmental Impact Report.

Overall, MasOrange's strategy and business model seek to combine industrial leadership, excellence in customer experience, the ecological transition, inclusive digitalisation and positive impacts, ensuring business resilience and contributing to socially and environmentally sustainable development.

MasOrange's commercial activity takes the form of a multi-brand strategy designed to respond to the connectivity needs of Spanish society as a whole, structuring its portfolio into three main segments:

- **Residential segment (B2C):** Comprehensive coverage of the mass market through a diversified offering. This ranges from premium telecommunications⁵ services and high-value-added convergent solutions (5G+ connectivity, fibre optics and audiovisual content) to value-oriented segments and purely digital (low-cost) options, ensuring universal access to telecommunications.
- **Business segment (B2B):** Strategic partner for the business community and public administrations. MasOrange provides advanced solutions including managed connectivity, cybersecurity, cloud services, big data and the Internet of Things (IoT), and virtual private networks (VPNs), driving the digitalisation and competitiveness of freelancers, SMEs and large corporations. In addition, the incorporation of innovations such as Artificial Intelligence (AI) strengthens and diversifies the portfolio, positioning the business as a fundamental pillar for sustainable growth.
- **Wholesale market:** Optimisation and operation of proprietary network infrastructure by providing services to other operators, promoting a robust, efficient connectivity ecosystem at the national level.

Investment of
**1,200
million
euros**
in innovation,
coverage
improvement, and
connectivity

⁵ MasOrange has no products or services that are prohibited in the markets where the Group operates. The Company does not engage in activities related to fossil fuels, chemicals or controversial weapons.

Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
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MasOrange has **8 main national brands** (Orange, Yoigo, Jazztel, MASMOVIL, Simyo, Pepephone, Lebara and Lyca) and **5 regional brands** (Euskaltel, R, Telecable, Guuk and Embou) addressing all the needs of customers in Spain. MasOrange's brand portfolio is described below:



Orange, this is an approachable, committed brand that offers value and connects customers with what matters most to them. Orange targets the premium segment of the market, providing products and services for private customers and businesses, standing out for the quality of its fibre optic network, Fibra Orange Infinity (XGSPON up to 10 Gbps), excellent 5G and 5G+ connectivity, a wide range of devices and a comprehensive, varied entertainment offering, including all football matches, other sports, quality content and new entertainment experiences such as music and games. This is all accompanied by a premium experience and additional services such as insurance, energy and alarms for homes and businesses.



Yoigo, this brand provides mobile phone, internet and television services. It stands out for its competitive rates and commitment to simplicity and transparency. The offering includes comprehensive home insurance for customers based on Zurich insurance, an alarm system in collaboration with ADT and a natural gas tariff with carbon-neutral emissions, as the brand will offset customers' gas consumption emissions by reforesting a burned forest near Torimbia beach in Llanes, Asturias.



Jazztel, this brand is highly recognised in the market for a value-for-money approach targeting customers who prefer high-quality services, such as fibre optics, 5G and Jazztel TV, for example, at a reasonable price. Jazztel's offering stands out for its simplicity and the brand's distinctive features, such as excellent connectivity and an exceptional customer service.



MASMOVIL. This telecommunications brand provides mobile phone, internet and television services. It is recognised for its competitive rates and its commitment to customer satisfaction. In 2024, the energy services were expanded by bringing in a gas tariff to help customers reduce their bills. As a result, customers receive a permanent monthly discount on their telephone bill for each electricity and gas supply contract, which can be accumulated for a second home. In association with CASER Seguros, it offers payment protection insurance with exclusive advantages, such as competitive prices, comprehensive coverage and an easy claims process.



Pepephone provides mobile phone, internet connection, TV and energy supply services. Pepephone has earned a reputation for commitment to transparency, simplicity and excellent customer service. It is recognised for competitive rates and a flexible policy that avoids long-term contracts, thereby allowing users to change plans or providers without incurring penalties. In recent years, Pepephone has offered fibre and mobile services while expanding its portfolio of services to include TV, access to the leading streaming platforms and electricity and gas rates for households.



Simyo, this brand provides mobile phone and internet services. Simyo stands out for flexibility and personalisation, allowing customers to create rates that suit their needs. It is recognised for affordable prices and a policy that eliminates long-term contracts, making it easy for customers to change plans or providers without penalties. In line with its dedication to flexibility, Simyo also allows customers to purchase devices by choosing the term and instalments payable, plus interest-free financing.



Lebara offers mobile phone services, its main customer appeal being affordable international rates. It focuses on communication solutions for immigrants and expatriates, making them affordable for people who need to stay in touch with their families and friends abroad. Services also include prepaid plans and contracts without minimum contract periods, making it easy for customers to control expenses and change plans.



Lycamobile offers international calls at affordable prices. It operates in numerous countries worldwide and is mainly aimed at immigrants and expatriates who need to communicate regularly with their countries of origin. This includes prepaid plans and contracts with no minimum contract period, allowing users to manage their expenses and modify their plans according to their needs. It is recognised for its competitive rates and extensive international coverage.

MasOrange also has **5 regional brands**:



Euskaltel offers fixed and mobile telephone, internet and television services in the Basque Country and Navarre, standing out for an attentive customer service and strong local presence. The offering for homes and businesses is based on a fibre and cable network, expanded through wholesale agreements, and integrated connectivity and entertainment packages.



R provides fixed and mobile telephony, internet and television services, mainly in the Galicia region. R stands out for its strong local focus and high-quality customer service. It offers a wide range of services for both residential and business customers.



Telecable is the main telecommunications provider in Asturias, notable for a local focus, customer service and high-quality fibre optic network. It offers telephone, internet and television services for homes and businesses.



Guuk is a telecommunications brand focused on the Basque Country and Navarre, offering mobile telephony, internet and television services. It stands out for its simplicity, transparency, good customer service, competitive prices and services tailored to local needs.



Embou offers telephone, internet, television, alarm and energy services mainly in Aragon, standing out for its personalised service, flexibility and fair prices.

MasOrange carries on all its commercial operations in Spain and offers customer service from its centres in Guadalajara (Castilla-La Mancha), Oviedo (Asturias) and Bogotá (Colombia). It has 6,685 employees in Spain and 1,900 in Colombia.

Sustainability strategy

The Group's ESG Policy embeds corporate responsibility into the business model and overall strategy, fostering a culture focused on sustainable value creation and positive impact on society, including citizens, customers, suppliers, shareholders, public administrations, the environment and local communities.

ESG strategic plan

MasOrange's ESG Strategic Plan reflects a firm pledge to have a long-term positive impact, generate value and reduce risks, taking into account all its stakeholders.

The ESG strategy for the period 2024-2027 is built on three fundamental pillars: purpose, vision and values. These aspects have been key strategic levers when defining the elements that underpin the plan, as well as the performance indicators and specific actions that guide implementation in the short, medium and long term. For more information on the Company's purpose, vision and values, see the section "Corporate culture and business conduct (G1-1)".

The plan design was also boosted by the double materiality analysis, which actively involved both internal and external stakeholders. This approach made it possible to identify the most relevant sustainability priorities, thus reinforcing the Group's strategic lines and consolidating the foundations of a responsible, resilient business model.



ESG strategic plan



Secure connectivity and customer experience

We connect people and businesses with the most advanced technologies to deliver an exceptional, secure, and reliable experience.



Digital Equality

We work to ensure that the opportunities of the digital world reach everyone, offering accessible and affordable services, and improving their competencies to reduce the gap digital.



Energy and Climate Change

We are moving towards climate neutrality by 2040. We promote energy efficiency and strengthen the resilience of our infrastructures, preparing them for the risks arising from climate change.



Circular Economy

We extend the life of devices, equipment and materials, through repair, reuse, refurbishment and recycling.
We are committed to eco-design and circular business models



Culture and Talent

We foster a culture based on our values: collaboration, pragmatism, positive attitude, and customer service.



Governance and Business ethics

We act with the highest standards of integrity, transparency and ethics, guaranteeing a solid governance model and effective.

Each ESG pillar has objectives and performance indicators that allow its evolution to be measured and evaluated and to define short-, medium- and long-term actions to achieve the goals.



Strategic pillars and priorities

This strategy is supported by an action plan containing specific short- and medium-term measures to ensure an effective, measurable roll-out. So a series of key performance indicators (KPIs) were defined for each of these six elements, allowing the measurement and evaluation of progress in ESG aspects and the definition of actions to be taken in the short and medium term.

MasOrange has specific targets for each ESG priority, along with the main outcomes expected in the coming years until these objectives are achieved. Further details on these targets can be found in the "Metrics and Targets" sections of the Report chapters. It should also be noted that the corporate objectives defined by the Group have been embedded into MasOrange's incentive plan. The most relevant objectives set in the previous year are described below:

- The Company has committed to achieving total decarbonisation by 2040 through the progressive reduction of Scope 3 carbon emissions after having achieved Scope 1 and 2 emissions neutrality in 2023. The pledge to use renewable energy and continuously enhance the network's energy efficiency remains firm, driven by the implementation of 5G Stand-Alone (SA) technology and various specific projects.
- The Group has set out to expand coverage and ensure secure mobile and fixed connectivity throughout Spain, paying particular attention to rural areas. There are also plans to improve the customer experience and promote digital skills, particularly among vulnerable groups, including initiatives to protect minors in the digital environment.

As regards governance, MasOrange is still encouraging the highest standards of ethics and transparency, managing its supply chain responsibly and using technological innovation to nurture sustainable business models.

Operating approach

MasOrange's operating model integrates sustainability management around six key levers connecting the Group's Purpose, Vision and Values with the effective implementation of the ESG strategy. First, the Double Materiality Analysis identifies the most relevant impacts, risks and opportunities from a business and stakeholder perspective. Based on this analysis, the ESG Strategy is defined and updated, together with a framework of specific, measurable goals and objectives for each strategic pillar, ensuring consistency between the materiality assessment and the key outcomes to be achieved.

The approach is also backed up by the Priority ESG Plan and the continuous monitoring of indicators, allowing cross-cutting initiatives to be promoted to advance the commitments made and facilitate data-driven decision-making. The ESG Community is made up of multidisciplinary teams and acts as a driver of change to stimulate implementation, strengthen capabilities and ensure that ESG criteria are embedded in all areas of the Company.



This is complemented by a robust Reporting and Communication system underpinned by consolidation, verification and Sustainability Report preparation processes using quality and traceability criteria established in the Internal Control over Sustainability Reporting (ICSR) System, as well as by impact measurement. Finally, the Ratings and Certifications dimension boosts the credibility of ESG performance through the external evaluation of the management model and recognised ratings and seals.

All in all, this operating model ensures sound governance, consistent implementation and continuous improvement in ESG performance, aligned with the material challenges of the business and stakeholder expectations.





Social impact

In 2025, MasOrange updated its ESG Impact Measurement Report, showing a significant positive impact, reflecting its commitment to sustainability. As a leading operator in Spain, MasOrange seeks to innovate and invest in future networks to create value and ensure the sustainability of its operations, connecting people through technology.

MasOrange prepares this report to measure and quantify the ESG impact of its activities, reinforcing its commitment to sustainability along three pillars:

- Integrating ESG criteria into its strategy and business model, aligning with global commitments and enhancing its positive impact.
- Supporting decision-making by turning ESG analysis into a strategic tool adapted to a constantly evolving world.
- Communicating progress transparently, ensuring that the Company's actions address the most relevant environmental and social priorities and strengthen stakeholder trust.

The study has been designed following a rigorous methodological approach based on best practices and structured in three phases:

1. Value chain analysis to identify and prioritize impacts on social development, digital inclusion, environmental sustainability, and ethical leadership.
2. Economic assessment and quantification of each impact, applying the methodology of the International Foundation for Impact Valuation (IFVI) and other direct quantification approaches, using internal data benchmarked against the market, and employing recognized financial proxies.
3. Reporting: consolidation of the results obtained, both quantitative data and qualitative information, into an ESG Impact Report for communication and dissemination to the various stakeholder groups.

The full 2025 Positive Impact Measurement Report can be consulted on the [MasOrange website](#).



An expanding commitment

In line with its commitment to sustainability and its impact on the environment, MasOrange is involved in initiatives that extend beyond its own operations:

- **2030 Agenda and the United Nations Global Compact.** On 20 September 2015, the UN General Assembly approved the 2030 Agenda for Sustainable Development, a 15-year global action plan that seeks to promote well-being, the planet and prosperity, as well as enhancing peace and justice. This Agenda is expressed through 17 Sustainable Development Goals (SDGs) and 169 targets spanning economic, social and environmental dimensions.
- **MasOrange's adherence and pledge renewal.** In 2020, MasOrange adhered to the United Nations Global Compact, reflecting its commitment to sustainability and responsible growth, and reinforcing its pledge to have a positive social impact. In 2022, the Group renewed this commitment and published a progress report (COP) as an Advanced member. Since then, it has reported progress annually on the Global Compact's official platform.
- **Promotion of the Ten Principles and the SDGs.** MasOrange actively supports and promotes the Ten Principles of the Global Compact, which address human rights, labour rights, the environment and the fight against corruption. The Group is also committed to promoting the 2030 Agenda and the 17 SDGs, with a special emphasis on those most closely linked to its business activity.
- **Embedding Sustainable Development Goals (SDGs) into the business activity:** The Group is particularly focused on building resilient infrastructure and promoting sustainable industrialisation and innovation (SDG 9). It is also engaged in actions to ensure inclusive, fair, quality education and promote learning opportunities (SDG 4); make cities more inclusive, safe, resilient and sustainable (SDG 11); revitalise the Global Partnership for Sustainable Development (SDG 17), combat climate change (SDG 13), provide affordable, clean energy (SDG 7), promote responsible consumption and production (SDG 12), foster gender equality (SDG 5) and encourage health and well-being (SDG 3).



Key SDG goals



Contribute to the improvement of people's health and well-being

We promote work-life balance through a hybrid and flexible model, comprehensive health and wellness programs.

Conciliation measures, digital disconnection and social benefits.



Contribute to inclusive, equitable and quality education and promote learning opportunities

We recognize education as a driver of personal development, employability and technological advancement, promoting key skills in the digital environment and educational.

More than 150,000 hours of employee training.



Promoting societies where gender equality prevails

We promote diversity and inclusion through equitable selection processes and the Diversity Plan.

32.6% of manager positions are held by women.



Building resilient infrastructure, promoting sustainable industrialization, and fostering innovation

We offer fixed and mobile connectivity and innovative services (IT, Cybersecurity and Mobile Financial Institutions) to regions, companies, operators and individuals.

93% 5G coverage and 96.60% rural 4G coverage.



Reducing inequalities within and between countries

We offer access to technology and knowledge, supporting integration and empowerment, and promoting the Digital equality, diversity and equality of opportunities.

124,974 participants in digital equality programmes.



Promoting more inclusive, safe, resilient and sustainable cities

We connect people with the latest technologies to ensure an exceptional customer experience and trusted relationships, prioritizing security and data protection.

Innovation to dynamically manage smart services in the environment, communications, mobility and transport.



Establish sustainable consumption and production patterns

We integrate the circular economy into your processes and business models through eco-design, extension and lifecycle optimization and recycling.

30% of fixed equipment placed at new installed.



Take urgent action to combat climate change and its impacts

We improve energy efficiency, increase the use of renewables and develop solutions with the aim of neutrality by 2040.

100% direct electricity consumption from renewable sources and 100% of Scope 1 and 2 emissions offset.



Promoting peaceful and inclusive partnerships

We respect fundamental rights and privacy, taking an ethical approach with responsible purchasing and anti-corruption measures.

1,731 suppliers evaluated in social, environmental, compliance and financial matters.



Strengthening the implementation of the Global Partnership for Sustainable Development

We promote socio-economic development through essential services.

Active collaboration with institutions, administrations, development agencies, technology partners, entrepreneurs, associations and NGOs.





ESG Ratings Leaders

79 pts. Sustainable Fitch ESG Entity Rating

Sustainability ratings

In recent years, the Group companies have obtained a number of ratings that consolidate MasOrange's sustainability commitment:

- **Sustainable Fitch – ESG Entity Rating: 79 points, the leader in Europe**

In 2025, MasOrange scored 79/100 in the Sustainable Fitch rating, the highest score awarded to a European telecommunications company.

- **Clarity AI – ESG Rating: 82 points, the leader in Spain**

In June 2025, MasOrange obtained a new ESG rating from Clarity AI with a score of 82 points, making it the leader among telecommunications operators in Spain.

- **Carbon Disclosure Project, CDP: B**

In 2025, the Group took part in the CDP environmental data disclosure initiative, repeating a B rating and reaffirming its commitment to decarbonisation and climate transparency.

- **EcoVadis: 80 points, Gold medal for top 5% leaders worldwide**

In September 2025, MasOrange was awarded the Gold medal by the agency EcoVadis, certifying that the Group is among the top 5% of companies assessed on the platform worldwide. This spans aspects related to the environment, business ethics, labour practices, human rights and sustainable procurement.

- **B Corp - certified brands:** Yoigo, MASMOVIL, Pepephone, Embou, Lycamobile, Lebara, Euskaltel, R, Telecable and Cablemovil.

Since 2021, as part of its relentless commitment to positively impacting people and the planet, MASMOVIL has been a “B Corp” enterprise. This recognition certifies the Group’s achievement of the highest standards in social and environmental impact, governance, public transparency and legal responsibility. Certification extends to all the MASMOVIL Group's brands

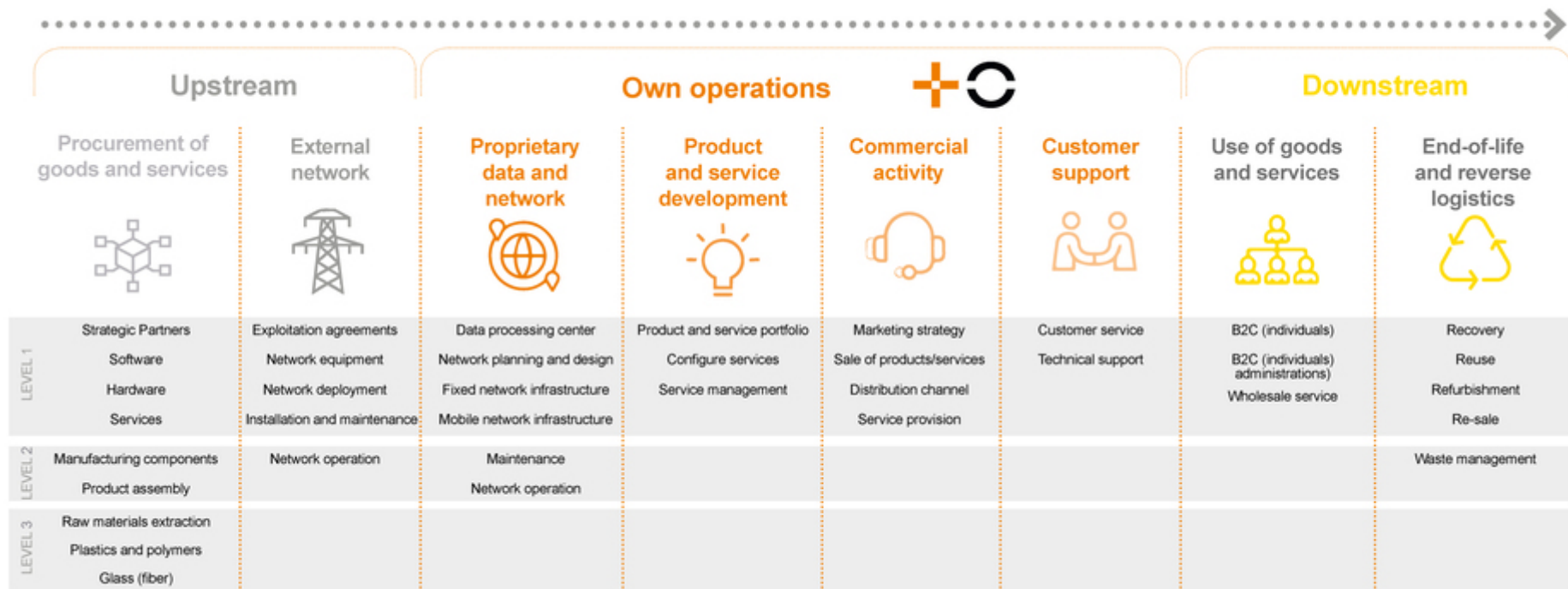
- **Standard & Poor’s Global Ratings:** A rating of 68/100 was issued to the Group company MASMOVIL in 2023, one point above the previous score.
- **Morningstar Sustainalytics: ESG Top Rated:** Since 2023, MASMOVIL has achieved a new milestone by obtaining an ESG Risk Rating from Morningstar Sustainalytics, with a “low-risk” rating and a score of 14.1. Thanks to this score, it joined the group of ESG Top-Rated undertakings in the telecommunications industry.



Value chain

MasOrange is aware that all the value created by its activity is possible thanks to the operational set-up throughout its value chain and the environment in which it operates. This spans all the components needed to develop the Group's value proposition, from initial conception to consumption through to the end of the useful life. Key inputs include the technology infrastructure, materials and components necessary for installation and maintenance, and mobile and fixed devices. It is managed through responsible supplier selection, efficient infrastructure maintenance and the optimised use of resources, ensuring service continuity and operational efficiency.

The Group defines its value chain as follows:



It has three main parts:

1. The **upstream phases** include procurement and external network infrastructure activities. These phases are in turn divided into tiers based on whether they are directly or indirectly related to the Company. In this part, the players in question intervene before the products or services reach MasOrange. Their involvement usually focuses on activities linked to the supply chain at numerous levels and is essential to get the operation going. For example, they include service providers, goods suppliers and strategic partners.



2. **Own operations** cover all the activities carried out directly by MasOrange, including all aspects related to its own data and network infrastructure, product and service development, commercial tasks and customer service. The main agents identified in this phase of the value chain engage in activities and manage relationships that are core to the marketing of the Company's products and services. This group mainly includes MasOrange's own personnel.
3. The **downstream phases** span all the activities that take place once MasOrange's products and services have been marketed. They include both the use of goods and services by customers and the management of products at the end of their useful life and in reverse logistics processes. In the downstream phases, the main players are customers and consumers, as well as those involved in the distribution, after-sales and product management phases, including both individuals and companies.

Interests and views of stakeholders (SBM-2)

In view of its leading position in the telecommunications industry, MasOrange seeks to establish relationships based on stakeholder trust and respect. To achieve this, it ensures continuous, fluid communication so as to be able to respond efficiently to their demands and ensure that stakeholder expectations are aligned with the Company's activity. With this in mind, the organisation adapts its policies and strategies, promoting harmony between its corporate identity and stakeholder interests.

I. Stakeholder relations

MasOrange believes that ongoing, constructive dialogue with its stakeholders is a fundamental pillar of the business strategy, so the potential impact its activities may have on each of them is taken into account.

Although the Company has ties to all its stakeholders, the levels of interaction and involvement differ. The frequency and depth of these relationships vary on the basis of operational relevance and proximity to the organisation.

To properly manage this relationship, MasOrange has specific dialogue channels for each group through which to encourage fluid, two-way communication. The overall aim is to strengthen ties, meet expectations and advance the Company's strategic objectives.

As part of its commitment to transparency and dialogue, MasOrange arranges quarterly meetings with shareholders to monitor the main ESG indicators. At least once a year, a meeting is held with investors to present the Group's progress in sustainability. In 2025, the main matters discussed were climate change, good governance and digital inclusion.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

The key stakeholders are set out below:

Stakeholders	Importance for MasOrange	Communication channels
Customers	They are the Group's raison d'être. MasOrange focuses on providing communications services for individuals and businesses, striving to facilitate access to technology through a close, trusting relationship.	▪ Social media and website. ▪ Customer service over the telephone, online or face-to-face. ▪ Customer surveys. ▪ Ethics Channel. ▪ Interviews during the dialogue with stakeholders. ▪ Direct contact. ▪ Face-to-face and virtual meetings.
Team	The people who make up the MasOrange team drive the Company to fulfil its mission.	▪ Working committees. ▪ Corporate intranet. ▪ Internal collaborative channels. ▪ Interviews during the dialogue with stakeholders.
Strategic partners	Suppliers and strategic business partners forming part of the Group's value chain.	▪ Consultation, evaluation and procurement processes. ▪ Interviews during the dialogue with stakeholders.
Workers in the value chain	Employees of suppliers and strategic partners forming part of the Group's value chain.	▪ Ethics Channel.
Society	MasOrange helps to build more prosperous communities through opportunities for access and connectivity that take into account users' expectations and needs.	▪ External communication actions. ▪ Social media and website. ▪ Interviews during the dialogue with stakeholders. ▪ Involvement in associations. ▪ Ethics Channel. ▪ I Think, Then I Act Platform (PLA).
Shareholders and investors	They provide support to achieve the growth and economic stability MasOrange needs to meet its commitments. The relationship is based on good corporate governance and transparency.	▪ Information and reporting channels. ▪ Ratings. ▪ Investor information requests. ▪ Meetings with investors.
Public entities	Public entities, from local to international, are important allies for MasOrange and are increasingly demanding in terms of ESG reporting regulations and the EU Taxonomy.	▪ Communication with public administrations: meetings and forums. ▪ Institutional sponsorships and industry associations. ▪ Forums, seminars and public consultations on regulation and related trends. ▪ Interviews during the dialogue with stakeholders.
Experts	Universities, non-profit organisations, foundations, professional, industry and other types of associations, entrepreneurial and impact communities, and other specialists.	▪ Forums, think tanks and events. ▪ Interviews during the dialogue with stakeholders.

Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	----------------------------	---------------------------	--------------------	---------------------------	----------

II. Interests and views of stakeholders

To gain insight into the expectations and needs of stakeholders, MasOrange undertook a double materiality analysis in 2024 involving both internal and external representatives. This process facilitated the inclusion of the most relevant sustainability issues in the Company's strategy and decision-making. Based on the analysis, the Group has implemented a management system through which its policies, actions, targets and metrics have been progressively aligned with the material topics that were identified, from a dual perspective:

- **Financial materiality:** risks and opportunities arising from matters relevant to MasOrange that may affect the Group's financial performance.
- **Impact materiality:** MasOrange's impacts on the environment and society through its value chain.

During the double materiality analysis, MasOrange established a proactive dialogue with its main stakeholders, actively involving them in the process so as to understand and consider their interests and opinions:

- **Identification phase:**

Area managers and/or subject matter experts were selected for this phase on the basis of technical knowledge in areas relevant to MasOrange and overall insight into the business. The main goal was to validate the initial list of impacts, risks and opportunities identified, as well as to detect any additional IROs. The preliminary list was distributed and specific work sessions were organised.

- **Assessment phase:**

During this phase, the scope was broadened to include both internal and external stakeholders of the MasOrange Group. A total of approximately 40 stakeholders participated in the process through two methods: focus groups for internal representation and interviews and panels for external representatives.

For internal representatives, various workshops were held on each sustainability aspect, including environmental, social and governance matters, differentiated as follows:

- Area managers and/or subject matter experts, as well as the workforce, were involved in the impact assessment.
- The ESG, Finance and Risk areas took part in the assessment of risks and opportunities, as well as area managers and/or subject matter experts.

For external representatives, the interests and views of B2B and B2C customers were taken into account through interviews and panels, respectively.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Stakeholder type	Impact assessment	Risk and opportunity assessment	Engagement type
Internal	- Area directors and/or experts - Workforce	- Area directors and/or experts - ESG and Compliance area	Focus groups
External	- B2B customers - B2C customers		- Interviews - Panels

▪ **Determination phase:**

In this final phase, after analysing the findings of the previous phase and setting a threshold, material topics and IROs were determined together with internal stakeholders, using the requirements described in this Report (see disclosure requirement “Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)”). These findings were included in the materiality analysis.

III. Considering stakeholder perspectives

MasOrange recognises the importance of considering the interests, concerns and suggestions of its stakeholders. So the Group has established the pillars of its ESG Strategic Plan based on the double materiality analysis findings, taking into account material topics and implementing the relevant adaptation or mitigation measures in its strategy and business model. For more information on this subject, please refer to the sections describing actions in the other Report chapters.

The pillars are:

Energy and climate change

Circular economy

Governance and business ethics

Culture and talent

Secure connectivity and customer experience

Digital inclusion



Consequently, MasOrange seeks to trigger positive impacts in local communities and leverage the opportunities identified during the double materiality analysis. It also aims to minimise or mitigate any adverse impacts it may have on its stakeholders, society and the environment, as well as managing the risks detected.

This integration has strengthened relationships with stakeholders by proactively addressing their main priorities and concerns, and ensuring that the Group's strategy remains aligned with their expectations.

IV. Reporting to governing bodies

To ensure transparency and the proper implementation of the double materiality process, MasOrange actively involved various areas responsible for the decision-making required during the analysis. The findings were subsequently shared with key members of the Management Committee.

MasOrange currently has a body specialising in the management of IROs: the ESG Committee, formed by various members of the Management Committee and chaired by the Chief Executive Officer. This committee meets quarterly and is responsible for making strategic decisions, allocating the budget, overseeing implementation of the ESG strategy and evaluating sustainability outcomes.

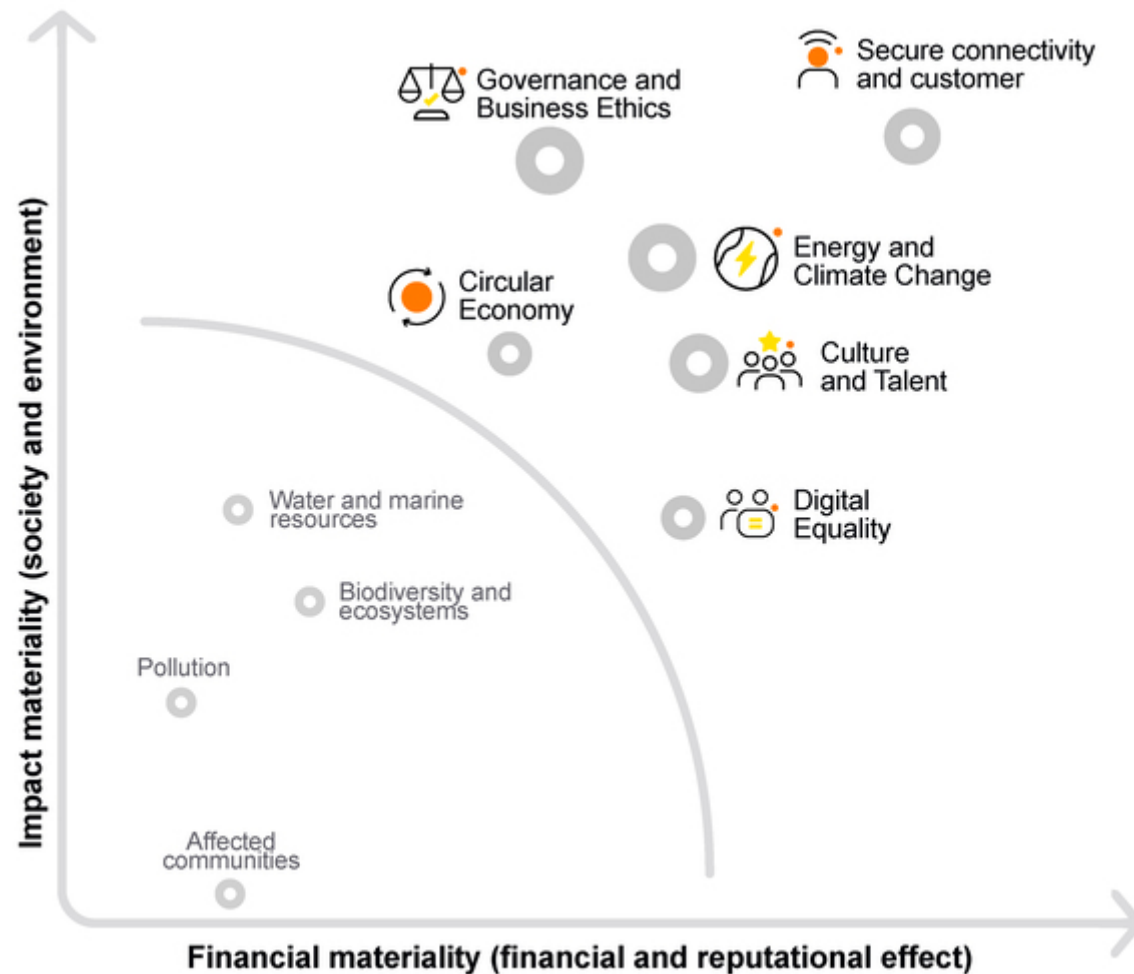
The ESG Community is also a fundamental component of the Group's management approach. It is a multidisciplinary community, led by the ESG area, comprising a group of experts from different divisions in the Company. Its objective is to identify and comprehensively manage the economic, social and environmental aspects that impact the Company.

ESG Community members drive change and the transition to a sustainable impact culture. Their responsibilities include leading key projects, collecting data and reporting on indicators related to the Sustainability Report, thus ensuring that MasOrange's ESG objectives are achieved.

The ESG team exists to implement the environmental, social and governance policies and actions that bring all of the above to fruition. This group ensures that sustainable practices are properly embedded in all operations, facilitates communication with stakeholders and leads the preparation of the Sustainability Report.



Material impacts, risks and opportunities and their interaction with strategy and business model(s) (SBM-3)



As previously indicated, in 2024 MasOrange undertook a double materiality analysis to identify the most relevant matters to be integrated into the Group's strategy and decision-making process. Through this exercise, the Company seeks to arrive at a clear view of the material impacts, risks and opportunities identified and explain how they influence its strategy and business model.

To ensure that this analysis continues to accurately reflect MasOrange's current reality, a review of material impacts, risks and opportunities was carried out in 2025. It included an analysis of the main industry trends, as well as confirmation that there have been no significant changes to the scope of consolidation, the Group's activity or its value chain that could affect the analysis findings. This revalidation confirmed that the initial analysis remains aligned with MasOrange's current reality. Finally, minor clarifications and specific segregations of some IROs were introduced to improve applicability and operational monitoring.

Findings of the double materiality analysis

During the identification phase, a total of 206 IROs were detected: 57 positive impacts, 53 negative impacts, 37 opportunities and 59 risks, arising from both the Group's own operations and the upstream and downstream phases of the value chain.

Following the assessment and materiality determination process, it was concluded that 6 of the 10 thematic ESRS were material to the Group, as they exceeded the established threshold. As regards these topics, 51 material IROs were identified: 34 positive impacts, 6 negative impacts, 8 opportunities and 3 risks.

The double materiality approach was tailored to the Company's specific reality by linking the material ESRS topics to its operational and strategic context and developing its own topics. For more information on the methodology employed in the double materiality analysis, see the disclosure requirement "Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)".



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	----------------------------	---------------------------	--------------------	---------------------------	----------

The following table provides further details on the topics listed⁶:

ESRS topics	ESRS sub-topics	ESRS sub-(sub-)topics
E1 Climate change	E1 Climate change adaptation	E1 Climate change adaptation
	E1 Energy	E1 Energy efficiency and renewables
	E1 Climate change mitigation	E1 Climate change mitigation (GHG)
E5 Resource use and circular economy	E5 Resource inflows, including resource use	E5 Repair, recycling and reuse of equipment and infrastructure
	E5 Waste	E5 Repair, recycling and reuse of equipment and infrastructure
S1 Own workforce	S1 Work-life balance	S1 Work-life balance
	S1 Secure employment	S1 Secure employment
	S1 Health and safety	S1 Health and safety
	S1 Diversity	S1 Diversity, gender equality and inclusion
	S1 Training and skills development	S1 Training and skills development
	S1 Gender equality and equal pay for work of equal value	S1 Diversity, gender equality and inclusion
S2 Workers in the value chain	S2 All sub-(sub-)topics	S2 Workers in the value chain

⁶ Please note that this table only lists the material topics.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

ESRS topics	ESRS sub-topics	ESRS sub-(sub-)topics
S4 Consumers and end-users	S4 Access to (quality) information	S4 Access to information and service quality
	S4 Personal safety	S4 Data security and privacy
	S4 Privacy	S4 Data security and privacy
	S4 Privacy	S4 Cybersecurity
	S4 Access to products and services	S4 Connectivity and socio-economic development
	S4 Access to products and services	S4 Affordable products and services
	S4 Access to products and services	S4 Innovation and sustainable new services
	S4 Non-discrimination	S4 Accessibility
	S4 Non-discrimination	S4 Digital skills development
	S4 Child protection	S4 Protection of children
	S4 Health and safety	S4 Health and safety
G1 Business conduct	G1 Corruption and bribery (prevention and detection, including training; case studies)	G1 Corruption and bribery
	G1 Corporate culture	G1 Corporate culture
	G1 Management of relationships with suppliers, including payment practices	G1 Supplier management

As a result of the process carried out, MasOrange grouped all the IROs into broad topics that were used to prepare the materiality matrix as the basis for defining the Company's six strategic pillars mentioned previously (Energy and climate change; Circular economy; Governance and business ethics; Culture and talent; Secure connectivity and customer experience; and Digital inclusion).



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	----------------------------	---------------------------	--------------------	---------------------------	----------

The main material impacts, risks and opportunities resulting from this analysis are summarised below:

ESG strategic lines	ESRS	+ Impacts	- Impacts	Opportunities	Risks
 Energy and climate change	E1	- Energy efficiency and use of renewable energies - Reduction in GHG emissions: own operations and value chain	- Energy consumption in devices and DPC - GHG emissions: Scopes 1, 2 and 3	Portfolio of sustainable solutions for climate change mitigation and adaptation	- The challenge of energy efficiency - Financial impacts of climate risk adaptation
 Circular economy	E5		E-waste management	Repair, recycling and reuse of equipment and infrastructure	
 Culture & Talent	S1	- Job security - Health and safety - Diversity, gender equality and inclusion - Life-work balance and digital disconnection - Training and skills development		Building a unified culture based on collaboration and customer service	
 Secure connectivity and customer experience	S4	- Service quality - Data privacy - Cybersecurity - Connectivity and socio-economic development		- Innovation and new sustainable services - Rural development	
 Digital inclusion	S4	- Affordable products and services - Accessibility - Digital skills development		Protection for minors	
 Governance and business ethics	G1 & S2	- Compliance: anti-corruption, anti-fraud and fraud prevention - Governance approach - ESG ratings and certifications - Supplier management - Workers in the value chain - Cultural integration			

Information on these material IROs is provided in the relevant ESRS topics. It includes a brief description of each IRO identified, its location in the value chain, the specific activity associated with it and the relevant time horizons. In the case of impacts, it is specified whether they affect society or the environment, indicating the link to the Group's strategy or business model.



Executive summary

General disclosures

Environmental information

Social information

Information on governance

Appendix

The Business Continuity Management System strengthens organizational resilience by protecting critical operations, reducing risks, and enabling their swift recovery in the event of disruptions.

Current financial effects of material risks and opportunities

No significant financial effects of the material risks and opportunities identified were observed in 2025, nor were any risks or opportunities detected that could lead to significant adjustments to MasOrange's Financial Statements. Should any such aspects materialise, the impact would be reflected in the Consolidated Annual Accounts (CAA), provided it exceeds the established materiality threshold.

Resilience of strategy and the business model

MasOrange is aware of the importance of a resilience plan in its strategy to ensure long-term success. This approach considers various aspects that may threaten the telecommunications sector and, specifically, the Group's operations, including climate change and its potential impacts. By identifying and addressing these risks, MasOrange commits to strengthening adaptability and promoting responsible development so as to ensure its assets are protected and contributions to society are positive.

Business Continuity Management System (BCMS)

MasOrange has a Business Continuity Management System (BCMS) that organises all the measures, processes and resources necessary to promote resilience, prevent disruptive events and guarantee the ability to respond to incidents, thereby ensuring the proper provision of its services to customers.

The system is based on processes and procedures enabling preparation, response and recovery in the event of operational interruptions. It also identifies potential threats that could compromise business continuity or trigger a crisis, so as to protect customers' interests and preserve the reputation and value of the Company and its brands.

By means of a risk analysis addressing impacts and probabilities, recovery levels are determined for critical activities in fixed, mobile and television communication services. Plans, controls and measures are defined and regularly tested through simulations and validation exercises, including post-mortem processes following actual incidents or crises, such as the torrential rains in Valencia (October 2024) or the national blackout (April 2025), which were overcome with flying colours.

MasOrange has implemented robust risk management, continuity and resilience processes so as to maintain operations and minimise the impact on services. It has mechanisms in place to protect people, secure critical infrastructure and quickly recover essential processes.

Key factors that strengthen adaptability include operational flexibility, diversification of services and channels, the use of advanced technology and a change-oriented organisational culture. These capabilities are backed up by quantitative indicators such as the average recovery time objective (RTO) for critical services, the annual frequency of continuity plan updates and a training level of over 90% for critical teams.

Business continuity risk analysis is carried out annually using methodologies validated by management, internal reviews, interviews with key managers, and evaluations of historical data, the results of which are managed by the Crisis Committee, which is ultimately responsible in the event of incidents.



This Committee has a dual function:

- In “peacetime”, it reviews and continuously improves the Continuity Management System.
- In “times of crisis”, it leads decision-making and initiatives to be taken to recover and get back to business as usual, reporting to the Executive Crisis Committee.

MasOrange's management leads and supports the BCMS, promoting continuous improvement and ensuring effectiveness. The system is certified under the ISO 22301 standard, guaranteeing compliance with the most stringent market standards.

In short, MasOrange's BCMS not only assures operational continuity in adverse scenarios but also actively contributes to the Group's sustainability and resilience, protecting the value of its business and the interests of all its stakeholders.

Climate resilience for sustainable performance

MasOrange also recognises the importance of adapting to climate change as a fundamental pillar for business continuity and responsibility. As extreme weather events become more frequent and intense, both communities and individuals have to adapt to reduce vulnerability and boost resilience.

In the case of MasOrange, this means embedding resilience into all phases of operations, including aspects ranging from infrastructure to cybersecurity, and involving all teams, from finance to technology, to assure business sustainability and security.

It is also essential to shift the focus from reactive crisis management to a proactive resilience plan. This change in focus not only brings benefits through a positive market perception and a pledge to social responsibility, but also prevents potential adverse impacts from a financial perspective.

To avoid interconnected risks and develop resilience that goes beyond climate change, concerns to be tackled include increasingly sophisticated cyber threats; growing geopolitical instability, which demands adaptive, agile responses; and digitalisation in the wake of the pandemic, posing new challenges and requiring the modernisation of infrastructure and processes to guarantee continuity and security in the face of adverse situations.

MasOrange recognises that building effective resilience to multiple environmental, social and governance risks requires a comprehensive, coordinated approach. The Company's ESG team plays a key role in various strategic actions.

Firstly, leadership and coordination are crucial to guiding and articulating resilience-related initiatives. The ESG team leads the preparation and implementation of a comprehensive framework integrating climate and sustainability considerations throughout the organisation, ensuring that all areas and levels work together in an aligned, proactive manner to tackle present and future challenges.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	----------------------------	---------------------------	--------------------	---------------------------	----------

Risk and impact assessment is critical to informed decision-making. The team systematically analyses the risks arising from climate change, as well as emerging threats in areas such as cybersecurity and geopolitical stability. This allows actions to be prioritised and strategies to be adapted in line with external developments, bolstering the Company's ability to anticipate and respond.

The definition and implementation of the ESG strategy within the MasOrange Group ensures that the policies and measures adopted are consistent, robust and geared towards creating sustainable value. This strategy spans both risk mitigation and the leveraging of opportunities so as to consolidate organisational resilience as a central pillar of the business.

Transparent reporting and active stakeholder engagement enable an open, constructive dialogue with customers, employees, regulators and investors. This communication strengthens trust and facilitates the alignment of objectives, as well as favouring accountability for progress with adaptation and resilience initiatives.

To ensure that resilience is embedded in the corporate culture, the ESG team promotes capacity-building and internal awareness programmes. Through training and awareness-raising, each employee is encouraged to understand their role in strengthening the organisation in the face of climate and social challenges.

Finally, MasOrange implements a rigorous system of monitoring, evaluation and continuous improvement. This cycle allows the effectiveness of the actions taken to be monitored, learning from experience and adjusting strategies as new scientific data become available and external conditions change. In this way, the Company assures a dynamic capacity for adaptation in the interests of sustainability and business continuity in an increasingly complex environment.

Impact, risk and opportunity management

In line with the Group's commitment to transparency, MasOrange presents below the information needed to understand the methodology followed to determine material impacts, risks and opportunities, and the information included in this Report as a result of double materiality.

Information on the materiality assessment process

Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1).

To identify material topics from the perspective of double materiality, MasOrange based its approach on the ESRS, implementing the 4-phase methodology described below:



Understanding phase

The understanding phase is crucial for a comprehensive, thorough understanding of the Group's operations and structure. This initial stage involves a rigorous analysis of the business model so as to gain a deep understanding of the various business lines and identify IROs linked to MasOrange's activity.

To identify these IROs, MasOrange carried out a detailed analysis of the value chain, this being the set of interdependent activities, resources and relationships linked to the business model and the external context in which the Company operates. The analysis was essential to obtain a full view of the business and its environment, particularly considering that many of the significant environmental, social and governance risks and opportunities originate outside the Group's direct operations.

The players involved in upstream activities in the value chain, such as suppliers, play a key role in providing both essential goods and services, and external network infrastructure. Those involved in downstream activities in the value chain make use of the goods and services offered by MasOrange, such as individuals, companies and wholesale services, or manage the Group's end-of-life products. This process of understanding the business allowed the Group's operations to be grouped into four blocks: activities related to its own data and network infrastructure, operations related to product and service development, commercial activity and, finally, customer service. See the disclosure requirement "Strategy, business model and value chain (SBM-1)" for a graphic representation of the value chain.

Another important aspect of this phase entailed identifying MasOrange's key stakeholders, which include all entities that affect or are affected by the Group's activities, as well as the experts who will play a role in the following phases of the analysis. Recognising these stakeholders is essential when designing strategies that are aligned with MasOrange's operational reality and are able to meet the stakeholder expectations. Further information on the stakeholders considered in the analysis can be found in the disclosure requirement "Interests and views of stakeholders (SBM-2)".

Identification phase

The aim in this phase is to identify the impacts that MasOrange generates both in its own operations and throughout the value chain, whether positive or negative. This phase also focuses on identifying the financial risks and opportunities associated with key industry factors and global sustainability trends.

MasOrange undertook the following analysis to identify the main impacts, risks and opportunities arising from its activity:

- **Understanding the MasOrange Group:** A detailed overview of the Group and its operations was obtained, enabling the identification of IROs directly linked to its activity.
- **Analysing the industry:** By reference to specialised industry publications, IROs were identified at the sector level, specifically for the Group's various business lines, such as GSMA and Ethno.



- **Analysing internal sources:** By means of internal sources such as sustainability reports, corporate policies and prior materiality analyses, among others, IROs related to the MasOrange Group's activity were identified.
- **Analysing external sources:** Academic publications, news and other external trends were used to identify IROs that impact the Group's operations.
- **Benchmarking:** Through the analysis of publicly available information on companies comparable to MasOrange, relevant IROs that are also applicable to its activity were identified.
- **Sustainability ratings:** Various ESG ratings (CDP, SASB, S&P) were analysed, identifying significant IROs linked to the Group's operations.
- **Corporate risk map:** Sustainability-related issues included in the corporate risk map (including the climate risk monitoring and analysis plan) were treated as key inputs for identifying risks within the double materiality framework.

Once internal and external sources had been analysed, the IROs were classified as follows:

Classification of impacts, risks and opportunities

Standards	Sector-agnostic, entity-specific.
Topics	ESRS topics, sub-topics, sub-sub-topics.
Business lines	Procurement of goods and services, external network infrastructure, data infrastructure and proprietary network, product/service development, commercial activity, customer service, use of goods and services, end-of-life and reverse logistics.
Value chain level	Upstream, own operations and downstream.
Activities	Business line activities represented in the value chain chart.
Description	Detailed description of the impact, risk or opportunity.

Classification of impacts

Type	Positive or negative.
Probability	Actual or potential.
Time horizons	Short term (<1 year), Medium term (1-5 years), Long term (>5 years).

Classification of risks and opportunities

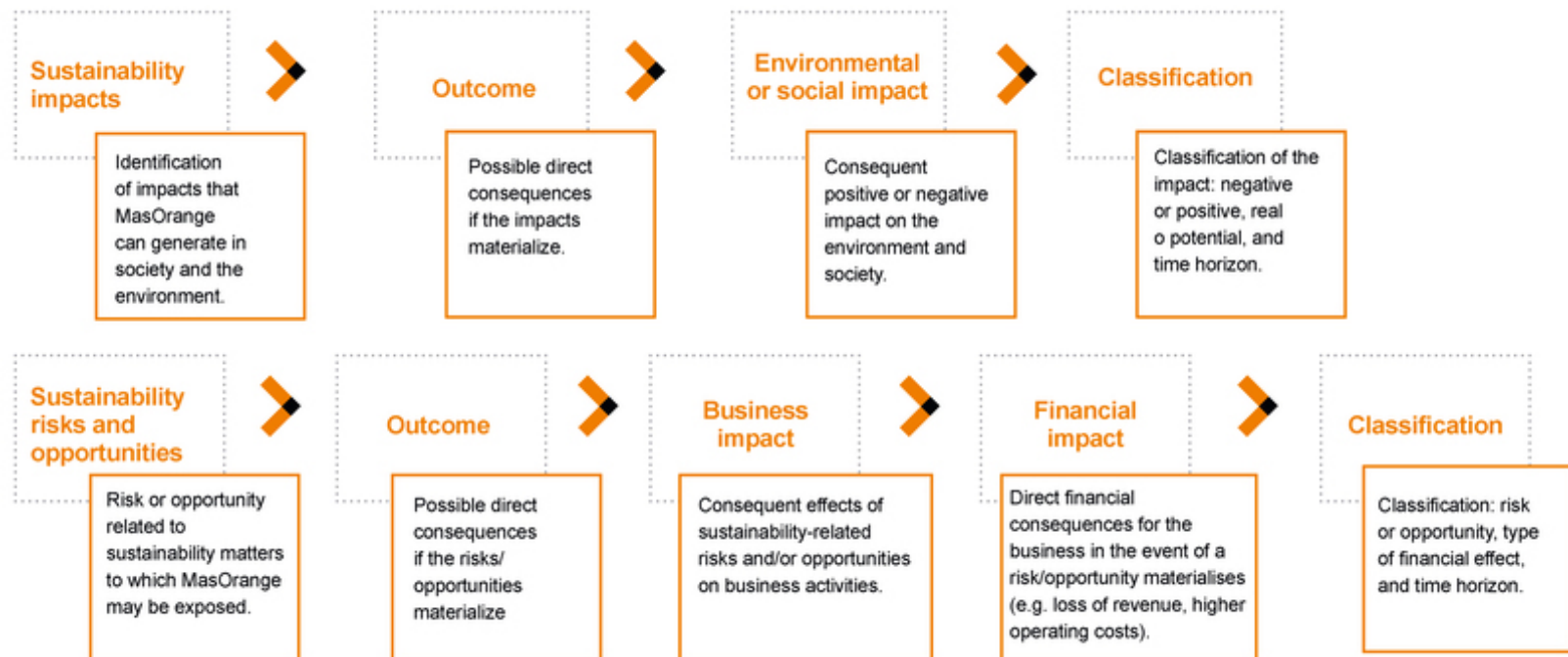
Type	Risk or opportunity.
Probability	Actual or potential.
Time horizons	Short term (<1 year), Medium term (1-5 years), Long term (>5 years).
Type of financial effect	Business performance, financial situation, cash flows, cost of capital or access to financing.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

MasOrange first identified the positive and negative impacts of its activity and, once it had drawn up an exhaustive list, the associated risks and opportunities were identified.

The methodology used to identify IROs is represented in the flowcharts below. The first shows the methodology followed to identify impacts, while the second illustrates the process followed to identify the associated risks and opportunities:





Finally, the preliminary list of IROs identified was shared with area directors and/or subject matter experts for validation. The identification process enabled MasOrange to clearly establish its sustainability priorities and ensure that its strategy remained aligned with emerging trends, industry challenges and the long-term global context.

Assessment phase

The aim of the assessment phase is to identify which topics are material to MasOrange and define a mechanism to assess impacts, risks and opportunities. The assessment scale established in the Group's corporate risk map was used and aligned with the ESRS approach.

In the process, MasOrange adopted the formula suggested by the ESRS, using the product of severity and probability to assess impact materiality, and the product of financial effect and probability to determine financial materiality.

The recommendations of the OECD Guidelines and the United Nations Guiding Principles on Human Rights, which state that when the severity of a negative impact exceeds the probability of occurrence, the severity criterion should prevail, were also taken into account. After analysing the findings, a total of 21 negative impacts related to human rights were identified. Although none of them reached the materiality threshold after applying the severity criterion, MasOrange maintained its pledge to continue analysing these impacts in line with its responsibility and commitment to human rights.

Impact assessment

Four variables were considered for the impact assessment: magnitude, scope and irremediability, which make up the severity concept, and probability. In addition, the assessment of impacts differs depending on whether they are positive or negative, and actual or potential. The variables employed are described below:

- **Magnitude:** refers to the intensity or size of the impact on the environment or society, and is measured on a scale of 1 to 5, where 1 is a slight impact and 5 is a very significant impact.
- **Scope:** refers to the extent of the impacts, both negative and positive. In the case of environmental impacts, magnitude may refer to the area of damage or a defined geographic boundary. For social impacts, it may refer to the number of people affected, either positively or negatively. Scope is assessed on a scale of 1 to 5, where 1 represents the minimum scope and 5 indicates a global scope.
- **Irremediability:** defined as the ease or difficulty of remedying a negative impact and the extent to which the environment can be restored or the previous status of the affected persons re-established. It is assessed on a scale of 1 to 5, with 1 representing a minimal need for remediation and 5 representing maximum difficulty of remediation.
- **Probability:** refers to the likelihood of an impact occurring, measured on a scale of 1 to 5, where 1 is unlikely and 5 is certain.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Severity		Probability	
Positive and negative impacts		Negative impacts	Potential impacts ⁷
Impact magnitude	Impact scope	Irremediability	Probability of occurrence
Low impact on the environment/society.	Minimum scope in the environment/society.	No corrective measures are needed to restore the prior situation.	The impact is highly unlikely to materialise.
Limited impact on the environment/society.	Limited scope in the environment/society.	Easy to restore a situation equivalent to the prior situation.	The impact is unlikely to materialise.
Significant impact on the environment/society.	Medium scope in the environment/society.	It is not easy to restore a situation equivalent to the prior situation.	The impact is likely to materialise.
Considerable impact on the environment/society.	Generalised scope in the environment/society.	Difficult to restore a situation equivalent to the prior situation.	The impact is highly likely to materialise.
Very considerable impact on the environment/society	Global scope in the environment/society.	It is very difficult to restore a situation equivalent to the prior situation.	The impact is certain or almost certain to materialise.

Risk and opportunity assessment

The assessment of risks and opportunities takes two main variables into consideration: financial effect and probability. These variables are defined below:

- **Financial effect:** defined as the effect of environmental, social or governance factors that may influence, either negatively (risk) or positively (opportunity), the undertaking's financial position, financial performance, cash flows, access to financing or cost of capital in the short, medium and long term. The financial effect is measured on a scale of 1 to 5, where 1 is slight and 5 is very considerable.
- **Probability:** refers to the likelihood of a risk or opportunity occurring, measured on a scale of 1 to 5, where 1 is unlikely and 5 is certain. Risks and opportunities are always potential, given their defined nature.

⁷ Actual impacts are always certain.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Financial effect	Probability
Risks and opportunities	Potential risks and opportunities
Potential magnitude of the financial effect ⁸	Probability of occurrence
<2 million €	The risk or opportunity is highly unlikely to materialise.
2 – 8 million €	The risk or opportunity is unlikely to materialise.
8 – 40 million €	The risk or opportunity is likely to materialise.
40 – 200 million €	The risk or opportunity is highly likely to materialise.
>200 million €	The risk or opportunity is certain or almost certain to materialise.

Finally, having established the assessment scales, the impacts, risks and opportunities were then assessed by a selected sample of MasOrange stakeholders. Focus groups were held with area directors and/or subject matter experts, the workforce and the Group's ESG and Risk areas, with the aim of ensuring appropriate engagement. Details of the scope of the interviews and questionnaires distributed can be found in disclosure requirement "SBM-2: Interests and views of stakeholders".

Determination phase

The determination phase seeks to establish which topics are material to the Group. Firstly, the assessments of internal and external stakeholders were examined. A weighting was then allocated to the IROs assessed, at 60% for the internal area assessments and 40% for the external stakeholder assessments.

MasOrange's ESG area also analysed the findings as subject matter experts and a consolidation process was carried out to establish a weighting of 50% for both their assessment and that of the internal (30%) and external (20%) stakeholders combined.

Based on this weighting and the analysis of the consolidated results, a materiality threshold was defined. This threshold was determined based on the maximum and minimum values obtained from both materiality assessments:

- **Impact materiality** showed a minimum value of 1.3 and a maximum value of 4.6, meaning that the results are scattered across the established topics⁹.
- **Financial materiality** showed a minimum value of 0.2 and a maximum value of 4. In this case, the results are concentrated in medium-low values, except for 5 risks and opportunities assessed with a high score, indicating low levels of risk for most of the topics.

⁸ The financial ranges were defined by MasOrange's risk area.

⁹ Possible maximum of $[(5 \times 5) = 25] / 5 = 5$ and minimum of $[(1 \times 1) = 1] / 5 = 0.2$.



Due to the variation in the assessments obtained for impacts and for risks and opportunities, two thresholds were set to identify the ESRS topics, sub-topics and sub-sub-topics that are material from an impact or financial perspective, or both:

- **Impact materiality:** The threshold selected is the 75th percentile, which is the data point that marks the upper limit of the third quartile of the assessment data distribution. The value of the 75th percentile for the assessments obtained is 3.7, implying that impacts above this threshold are considered material and those below are considered non-material.
- **Financial materiality:** The threshold selected is the 50th percentile, which is the data point that marks the mean value of the assessment data distribution. The value of the 50th percentile for the assessments obtained is 2.1, implying that risks and opportunities above this threshold are considered material and those below it are considered non-material.

A lower percentile was selected for financial materiality because the assessments obtained are lower on a scale of 1 to 5 than for impact materiality.

Finally, it should be noted that to ensure adequate stakeholder engagement when determining IROs, the material topics and IROs were validated with the Group's internal stakeholders based on the consolidated assessment results.

Disclosure requirements in ESRS covered by the undertaking's sustainability statement (IRO-2)

For information on the criteria adopted by MasOrange to ensure the transparency of this Report, see Appendix I. These criteria allow an understanding of the content included, as well as the topics excluded because they were not considered material during the assessment process. It should also be noted that, in the process of identifying IROs, MasOrange took into consideration the list of topics, sub-topics and sub-sub-topics defined in ESRS 1 AR 16.

Policies, actions, targets and metrics

Corporate policies (MDR-P)

All policies approved by the Board of Directors and/or the Chief Executive Officer are published on the Group's intranet (accessible to all employees) and on the corporate website; they apply to the entire MasOrange Group.

The Group has internal policies and processes in place to foster respect for labour rights and the avoidance of discriminatory practices. These commitments are essentially set out in the Group's Code of Ethics, which addresses the following aspects, among others: addictive substances; child labour and forced labour; freedom of association and collective bargaining; integrity; non-discrimination, equal opportunities and diversity; safety, health and well-being; and recruitment.



MasOrange also has the following policies and certifications endorsing the development of the Company's ESG strategy:

Policies

ESG Policy
Environment and Energy Policy
Anti-Corruption Policy
Conflict of Interest Policy
Gifts and Invitations Policy
Criminal Prevention Policy
Economic Sanctions Compliance and Trade Control Standards Policy
Information Security Policy
Internal Information System Policy – Ethics Channel
Quality Policy
Global Corporate Governance Policy
Supplier Code of Conduct
Internal Control Policy
Risk Control and Management Policy
Privacy and Data Protection Management Policy
Global Security Policy
Business Continuity Policy
Occupational Health, Safety and Well-being Policy
Equality Plans
Anti-Fraud Policy
Competition Policy
Tax Policy
Artificial Intelligence Use Policy
External Auditor Relationship Policy
Diversity, Equality and Inclusion Policy

10 certified brands



The Company makes sure its corporate policies are applied correctly by means of management system audits and certifications:

Management system certifications

B Corp certification for 10 brands Yoigo, MASMOVIL, Pepephone, Embou, Lycamobile, Lebara, Euskaltel, R, Telecable, and Cablemovil

ISO 9001: Quality Management System

ISO 14001: Environmental Management Systems

ISO 50001: Energy Management Systems

ISO 14064: Greenhouse Gas Certification

EMAS system: European Eco-Management and Audit Scheme

ISO 37001: Anti-Bribery Management Systems

UNE 19601: Criminal Compliance Management System

ISO 27701: Information Privacy Management

National Security Scheme (ENS), high-category certification

ISO 22301: Business Continuity Management Systems

EMAS system: Service Quality and Billing Quality

ISO 45001: Occupational Health and Safety Management Systems

ISO 45003: Psychological Risk Management

Details of these policies required by the minimum disclosure requirements (MDR-P) will be specified in the relevant thematic standards.

Policy implementation, preparation, approval and entry into force

Corporate policies are based on best practices, international frameworks (such as COSO) and policies previously approved by the governing bodies of MASMOVIL and Orange so as to implement the mechanisms needed to offer reasonable assurance of the reliability of the financial and non-financial information of the Company and its subsidiaries, as well as to establish principles and guidelines ensuring that risks to which the Group's strategies and obligations may be exposed are at all times identified, quantified, reported and, as far as possible, controlled within the risk appetite defined by the Board of Directors.

The Group's general policies and strategies are developed by the relevant areas and then reviewed by the Audit and Risk Committee for approval by the Board of Directors. Final approval lies with MasOrange's Board or, where applicable, the Chief Executive Officer, exercising delegated powers.

**Body responsible for overseeing policy compliance**

The Regulatory Compliance Director is responsible for adopting and/or coordinating the measures deemed appropriate to ensure proper compliance with the MasOrange Group's Anti-Corruption and Criminal Risk Management Model, and for managing the Ethics Channel, among other matters, as laid down in the Internal Compliance Function Charter. So this director is entrusted with the mission of overseeing compliance with the policies in force, assisted by all the area directors.

MasOrange also has an Ethics and Compliance Committee responsible for promoting and coordinating observance of the Code of Ethics, the Anti-Corruption Policy, the Criminal Prevention Policy and the Internal Information System Policy, formed by the following members: Regulatory Compliance Director, General Manager of Legal and Assurance, Chief Financial Officer, Chief People Officer, Internal Audit Director and the Compliance team.

Assessment of the proper application of social policies through internal and external audits

Internal and external audits are conducted to confirm the effectiveness and functioning of the risk management system which, among other aspects, verifies and evaluates implementation of the various policies.

To ensure observance of corporate policies, MasOrange applies the Three-Lines-of-Defence Model, structured as follows:

1. The functions responsible for processes that assume risks are the first line of defence. This line includes the Finance, IT and Network Departments, and the business units, among others.
2. The second line of defence comprises Internal Control, Risk and Compliance, and other areas of the Company that oversee effective risk control (Data Protection Officer (DPO), Cybersecurity, Telco and Non-Telco Fraud and Revenue Assurance, among others).
3. The third line of defence is Internal Audit, reporting to the Audit and Risk Committee, which in turn reports to the Board of Directors.

Besides those indicated, external auditors are responsible for independently verifying the internal control system as part of the audit of annual accounts and non-financial information.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Metrics (MDR-M)

The following sustainability milestones should be noted in relation to 2025:

Strategic pillar	Main 2025 milestones and indicators
Energy and climate change	Development of the Decarbonization Plan aligned with SBTi to achieve carbon neutrality by 2040
	Climate risk and adaptation plan analysis
	100% of direct GHG emissions offset (net zero scope 1 and 2 emissions)
	100% of direct electricity consumption from renewable sources
Circular economy	Eco-designed Wi-Fi 7: 100% recycled plastic, 5% less energy, 5% lower footprint
	30% of reconditioned equipment installed in its customers /792,000 devices)
	Equipment recovery rate above 96%
Culture and talent	Signing of the collective bargaining agreement
	8,585 people employed at the end of 2025, 99% of them on permanent contracts
	48% women in the workforce and 32.6% in leadership positions
	158,708 training hours
	7.1 Cultural integration index
Secure connectivity and customer experience	Leader in satisfaction and number of customers, with 33.4 million fixed and mobile lines (excluding M2M)
	Creation of PremiumFiber, the largest fiber-optic company in Spain
	€1.2 billion invested in FTTH/5G roll-outs and new services
	Pioneers in the deployment of 5G Advanced in 40 Spanish cities
	B2B partner of reference in innovation for both businesses and public administrations
	Expanded cybersecurity services portfolio for businesses
	32 million households and businesses connected with fiber-optic through own or third-party infrastructure
	>99% of population covered by 4G network
	93% 5G coverage
	11% reduction in customer strikes
Digital equality	Over 390,000 sustainable energy service customers and over 925,000 security customers
	125,000 people training in digital skills
	96.6% rural 4G network coverage
Governance and business ethics	25 Board-approved policies that implement the ESG strategy
	96% of the workforce trained in cybersecurity, compliance and information security
	Consolidated leadership in ESG ratings: 79 Sustainable Fitch, 82 Clarity AI, 80 EcoVadis Gold, 8 B Corp brands, CDP
	95% of European suppliers and 85% of Spanish suppliers
	98% of expenditure and 1,731 suppliers assessed for ESG, compliance and financial risks



Details of these metrics required by the minimum disclosure requirements (MDR-M) will be specified in the relevant thematic standards.

Actions (MDR-A)

Details of actions required by the minimum disclosure requirements (MDR-A) will be specified in the relevant thematic standards.

Targets (MDR-T)

Targets for 2027 are set out below:

Strategic pillar	Description of the target and aspiration for 2027
Energy and climate change	100% offset of direct GHG emissions
	100% renewable power v. total direct consumption
	Energy consumption (Gwh) <224
	96% renewable energy v. total energy
Circular economy	56% of fixed equipment reconditioned and installed
	70% of new devices eco-designed
Culture and talent	Implementation of transitional measures under the Collective Bargaining Agreement
	35% women in leadership positions
	30% women in technology positions
	Cultural integration index >8
Connectivity and customer experience	Consolidation of leadership in customer satisfaction and numbers
	Continued deployment of the best 5G SA and FFTH networks
	Further reduction in the number of strikes
	Increase in the number of customers of advanced digital solutions for businesses and public administrations
Digital inclusion	Increase in the number of green energy customers
	Continued improvement of rural coverage throughout the territory
	300,000 beneficiaries of digital training programmes in 2024-2027 ¹⁰
Governance and business ethics	Continued leadership in ESG ratings
	95% of expenditure on suppliers assessed for ethical, anti-corruption and sustainability risks
	0 Confirmed human rights incidents in the value chain
	75% of employees trained to use of ethical, reliable AI
	Ensure zero tolerance for corruption and influence peddling in all the Group's activities.

Details of targets required by the minimum disclosure requirements (MDR-T) will be specified in the relevant thematic standards.

¹⁰ Includes the "Everything to Learn" programme, in which MasOrange and the Orange Foundation participate.

Environmental information





2. Environmental information

European Union Taxonomy

Background

In 2019, the European Commission adopted, through the “**European Green Deal**”, an action plan to promote an environmental transition towards sustainability. This set of measures aims to achieve **climate neutrality in Europe by 2050**. The commitment includes the **EU Taxonomy** (“Taxonomy”), a common classification system setting out **specific technical criteria** to identify which economic activities are considered environmentally sustainable.

The Taxonomy fulfils key functions such as preventing **greenwashing**, i.e. stopping companies from labelling activities as sustainable when they are not. By establishing a set of harmonised technical standards, the Taxonomy enables investors or enterprises to identify which activities or products are truly sustainable, thereby contributing substantially to environmental objectives.

The obligation to report information aligned with the Taxonomy stems from the disclosure requirements set out in Articles 19a and 29a of Directive 2013/34, as amended by the CSRD, which require companies to publish sustainability information.

In this regard, the Taxonomy requires that activities comply with **Regulation (EU) 2020/852**, which lays down six key environmental goals:

Climate change mitigation

Climate change adaptation

Sustainable use and protection of water and marine resources

Transition to a circular economy

Pollution prevention and control

Protection and restoration of biodiversity and ecosystems



This Regulation was later supplemented by two Delegated Regulations. The first, **Delegated Regulation (EU) 2021/2139 of 4 June**, contains a list of economic activities that contribute substantially to climate change mitigation and adaptation and cause no significant harm to other environmental objectives. **Delegated Regulation (EU) 2021/2178 of 6 July** defined the **reporting methodology, disclosure format and key indicators** companies subject to non-financial reporting obligations must use to submit their Taxonomy-related data.

In 2023, this framework was again updated through two new regulations. **Delegated Regulation (EU) 2023/2485 of 27 June** expanded the catalogue of activities that can contribute substantially to climate change mitigation and adaptation, as well as revising certain pre-established technical criteria. The second, **Delegated Regulation (EU) 2023/2486 of 27 June**, sets out the technical selection criteria for activities that contribute substantially to four additional environmental objectives: sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems.

Finally, in 2026, **Delegated Regulation (EU) 2026/73 of 4 July** was approved, simplifying disclosures under **Article 8 of Delegated Regulation 2021/2178** and adjusting technical criteria to bring in thresholds of 10% materiality, exclusions and reduced reporting templates, as well as clarifying the generic criteria of “not causing significant harm”. MasOrange will apply the simplified reporting templates in the current fiscal year.

Reporting requirements

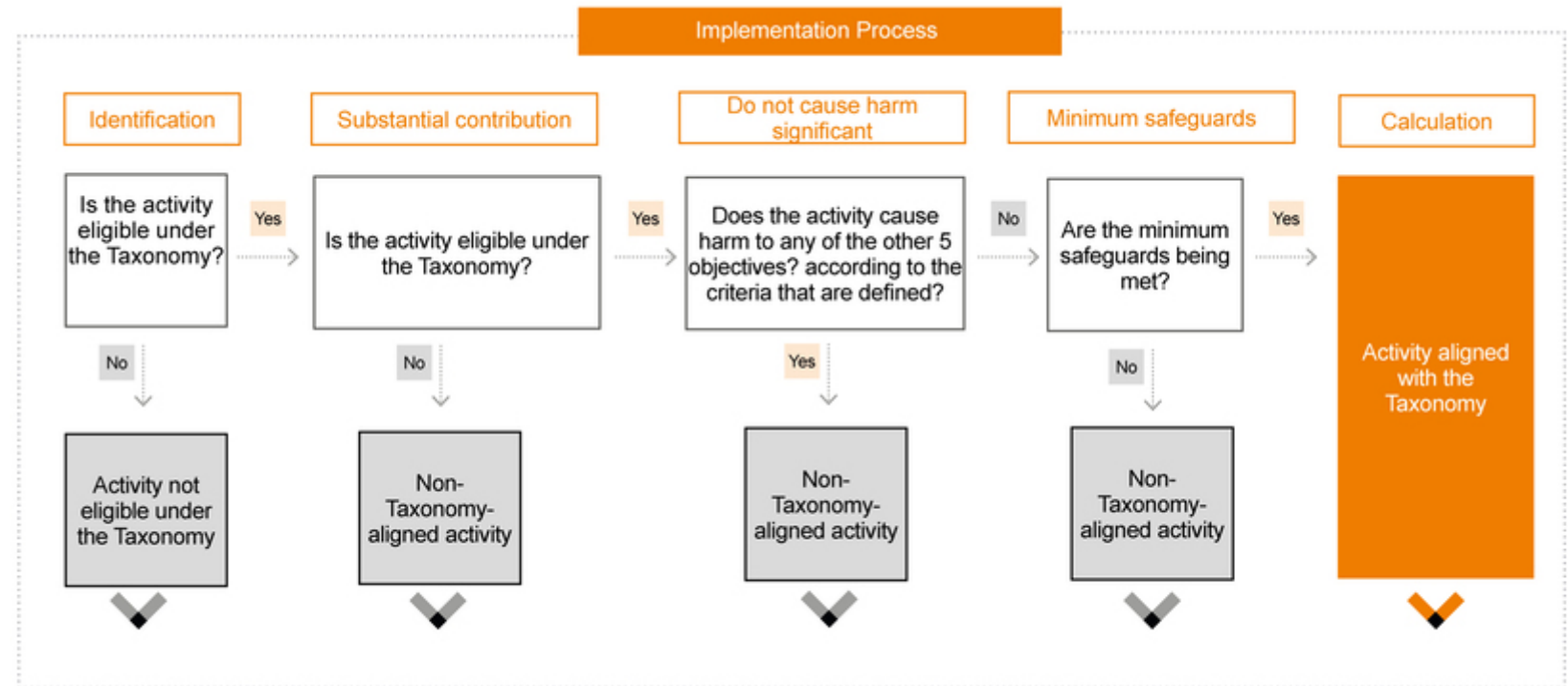
The Taxonomy requires undertakings to analyse, on an annual basis, whether their activities are eligible and aligned with sustainability criteria and to report the findings.

- **Eligible activities:** Activities that meet the description of one of the activities listed in any of the six annexes to the Regulations are deemed eligible: **Delegated Regulation 2021/2139 of 4 June 2021** or **Delegated Regulation 2023/2486 of 27 June 2023**. For an activity to be eligible, it must have the potential to be sustainable in accordance with the Taxonomy.
- **Aligned activities:** Activities that contribute substantially to the other environmental objectives defined by the Taxonomy are considered aligned. Certain substantial contribution criteria have to be observed, in addition to doing no significant harm (DNSH) to the other objectives, as well as minimum social safeguards.

Additionally, as mentioned above, **Regulation 2021/2178** establishes key performance indicators (KPIs) that must be disclosed, including: **turnover**, capital expenditure (**CapEx**) and operating expenditure (**OpEx**), presented as the proportion of eligible or aligned activities in relation to the undertaking's total turnover, CapEx and OpEx.



The Taxonomy analysis process is described below:



It should be noted that reporting requirements have not followed a linear path. In 2021, it became mandatory to report eligibility information based on environmental objectives for climate change mitigation and adaptation. In 2022, companies were also required to disclose information on their alignment with these same two objectives. In 2023, reporting was extended to eligibility for all objectives, and alignment with climate change mitigation and adaptation objectives. From 2024 onwards, it became mandatory to report eligibility and alignment with respect to all six environmental objectives.



Taxonomy scope

Eligibility analysis

Eligible economic activities

For 2025, this being the first report under the CSRD Directive and the ESRS, MasOrange analysed its eligible activities in coordination with the business areas, to ensure that they come under one of the six environmental objectives established by **Delegated Regulation 2021/2139 of 4 June** and **Delegated Regulation 2023/2486 of 27 June**.

Climate change mitigation annex activities

- **Activity 7.2 “Renovation of existing buildings”**. In 2025, MasOrange undertook a full refurbishment of one of its operational buildings in Extremadura, entailing the renovation of over 25% of the building's envelope. The investment made in this renovation contributed to determining the eligibility of this activity.
- **Activity 7.3 “Installation, maintenance and repair of energy efficiency equipment”**. In 2025, MasOrange implemented energy efficiency measures in its operational buildings, such as installing LED lighting and replacing air-conditioning and heating equipment with more efficient models. The investment made in installing LED lighting and replacing air-conditioning and heating equipment, helped to determine the eligibility of this activity.
- **Activity 7.6 “Installation, maintenance and repair of renewable energy technologies”**. In 2025, MasOrange made a major investment to install solar panels on its operational buildings so as to optimise energy consumption. This investment contributed to determining the eligibility of the activity.
- **Activity 8.1 “Data-processing, hosting and related activities”**. In 2025, MasOrange processed data through its own Data Processing Centres (DPCs) located in the buildings where business is conducted. The revenues obtained and the investment in procurement and rights of use contribute to the eligibility KPIs of this activity.

Transition to a circular economy annex activities

- **Activity 3.2: “Renovation of existing buildings”**. In 2025, MasOrange undertook a full refurbishment of one of its operational buildings in Extremadura, entailing the renovation of over 25% of the building's entire envelope. The investment made in this renovation contributed to determining the eligibility of this activity.
- **Activity 5.5 “Product-as-a-service and other circular use- and result-oriented service models”**. MasOrange identified two eligible business lines in 2025:
 - Service consisting of the delivery and commissioning of routers and decoders to customers during the subscription period and collection at contract expiration.
 - Transfer of the right to use mobile and fixed network infrastructure to third parties.

Both the revenue and investment from the transfer of the right to use fixed and mobile network infrastructure and the revenues and investments associated with the router and decoder delivery and collection service during the subscription period contribute to the eligibility KPIs of this activity under the criteria established by the regulations.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

		Turnover	CapEx
Climate Change Mitigation	7.2. Renovation of existing buildings		✓
	7.3. Installation, maintenance and repair of efficiency equipment Energy		✓
	7.6. Installation, maintenance and repair of energy technologies renewable		✓
	8.1. Data processing, hosting and related activities	✓	✓
Transition to an economy	3.2 Renovation of existing buildings		✓
	5.5. Product-as-a-service and other circular use- and result-oriented service models	✓	✓

✓ Eligible



Non-material economic activities

A series of economic activities have been identified that are considered non-material (referred to as “unassessed activities considered non-material” in the context of **Delegated Regulation 2026/73** “Omnibus”) in accordance with the Company's business model, as it is focused on the provision of services given that they do not involve significant maintenance or operating lease expenses (OpEx). These economic activities relate to the following activities categorised under the Taxonomy.

- **Activity 6.5 “Transport by motorbikes, passenger cars and light commercial vehicles”.** In 2025, MasOrange had a fleet of vehicles owned for corporate, commercial and technical purposes, all of which are leased. Operating lease expenditure have been incurred.
- **Activity 7.5 “Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling energy performance of buildings”.** In 2025, MasOrange incurred maintenance expenses associated with systems installed in previous financial years, such as the Building Management System (BMS) for centralised control and optimisation of power consumption, as well as presence detectors in meeting rooms, garages and basements.
- **Activity 7.7 “Acquisition and ownership of buildings”.** Although MasOrange made no new property acquisitions in 2025, acquisitions in previous financial years entailed the need to incur maintenance expenses associated with these assets.

Additionally, according to activities **CCM 7.3 “Installation, maintenance and repair of energy-efficiency equipment”** and **CCM 8.1 “Data processing, hosting and related activities”**, MasOrange reports the CapEx associated with CCM 7.3 and the revenues and CapEx associated with CCM 8.1 as material. In both activities, OpEx related to their operation and maintenance is also identified; however, given the nature of OpEx within the Taxonomy framework and its limited magnitude, these amounts are reported as immaterial.

Alignment analysis

Alignment takes place after analysing the eligibility of the various economic activities. It entails compliance with the substantial contribution, DNSH and minimum social safeguard criteria.

Analysis of compliance with substantial contribution criteria

Contribution to climate change

The technical criteria for substantial contribution to climate change are presented below, analysing compliance with the requirements set out in Annexes I and II of **Delegated Regulation (EU) 2021/2139 of 4 June**, which define the specific climate change mitigation requirements applicable to the activities assessed.

There follows a list of eligible activities whose alignment has been demonstrated:



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

- **Activity 7.3. "Installation, maintenance and repair of energy efficiency equipment"**. It was verified that only a part of the air-conditioning and heating equipment installation and maintenance projects meet the established technical requirements. To determine the amount considered to be aligned, a specific ratio was applied reflecting the proportion of projects whose equipment falls within the two highest energy-efficiency classes, thereby calculating the aligned amount of the total investments assessed.
- **Activity 7.6. "Installation, maintenance and repair of renewable energy technologies"**. It was verified that all associated CapEx items comply with at least one of the individual measures envisaged for this activity under the applicable selection criteria. The review performed confirms that the actions included relate to the categories considered and meet the requirements established to identify a substantial contribution to climate change mitigation.

The list of eligible activities whose alignment could not be demonstrated is set out below:

- **Activity 7.2. "Renovation of existing buildings"**. The technical complexity of the selection criteria associated with this activity makes it difficult to adequately demonstrate and verify within the scope of the analysis carried out, so it is classified as eligible but not aligned.
- **Activity 7.3. "Installation, maintenance and repair of energy efficiency equipment"**. As regards items classified as non-aligned within this activity, LED lights do not meet the required energy efficiency requirements, as they do not fall within the two required efficiency classes. In line with the previous analysis of aligned items, certain air-conditioning and heating equipment also failed to reach those limits. This equipment is therefore classified as non-aligned within this activity.
- **Activity 7.7. "Acquisition and ownership of buildings"**. This activity is reported as eligible but not aligned because, as in the 7.2 case, the complexity of verifying the required technical criteria exceeds the scope.
- **Activity 8.1. "Data-processing, hosting and related activities"**. In line with the above, this activity is reported as eligible but not aligned, as it has not been possible to fully verify compliance with the technical selection criteria due to the complexity involved in applying the required best practices, which must also be verified and audited every three years.

Transition to a circular economy

The technical criteria for substantial contribution to the transition to a circular economy are set out below, analysing compliance with the requirements of the relevant Annex to **Delegated Regulation (EU) 2023/2486 of 27 June** applicable to the activities assessed.

Alignment has been demonstrated for the following eligible activity:

- **Activity 5.5. "Product-as-a-service and other circular use- and result-oriented service models"**. It was verified that a proportion of the associated revenue and CapEx items meet the technical requirements for substantial contribution to the transition to a circular economy established for this activity. In particular, the contractual conditions set out in the first point of these technical requirements have been assessed; in addition, it has been confirmed that the evaluated operations extend the useful life of the devices analysed (routers and set-top boxes), as MasOrange is responsible for collecting and reusing these devices whenever feasible. It has also been verified that the packaging used for the delivery of these devices meets the requirements set out in point 3 of this substantial contribution criterion.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	----------------------------------	--------------------	---------------------------	----------

The list of eligible activities whose alignment could not be demonstrated is set out below:

- **Activity 3.2 “Renovation of existing buildings”**. The complexity of the technical selection criteria associated with this activity makes it difficult to demonstrate and verify, so it is classified as eligible but not aligned.
- **Activity 5.5. “Product-as-a-service and other circular use- and result-oriented service models”**. The activity also has a second aspect relating to the assignment of rights to use network infrastructure. This was not analysed for alignment, as the applicable technical criteria are particularly complex and there is insufficient evidence to demonstrate compliance with the technical requirements. So it is reported as eligible but not aligned.

Analysis of compliance with the do no significant harm (DNSH) criteria

To continue aligning the activities evaluated, MasOrange analysed compliance with the “do no significant harm” (DNSH) criteria, verifying that each economic activity does not have adverse impacts on other environmental objectives:

- **Activity 7.3. “Installation, maintenance and repair of energy efficiency equipment”**. Compliance with the requirements set out in Appendix A and Appendix C is necessary for this activity. MasOrange has verified that the associated CapEx items satisfy both appendices, confirming that they fulfil the applicable regulations.
- **Activity 7.5. “Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling energy performance of buildings”**. This activity has to comply with Appendix A. MasOrange has verified that the eligible OpEx items meet those requirements.
- **Activity 7.6. “Installation, maintenance and repair of renewable energy technologies”**. As with the previous activity, this entails meeting the provisions of Appendix A. MasOrange has verified that the eligible CapEx items satisfactorily comply with the conditions set out in that appendix.
- **Activity 5.5. “Product-as-a-service and other circular use- and result-oriented service models”**. All aspects of this activity must meet the requirements of Appendices A, B and C of **Delegated Regulation (EU) 2023/2486**, as well as the additional criterion that, when the activity involves on-site heat or cold generation, or cogeneration, direct GHG emissions must be below 270 gCO₂e/kWh (DNSH mitigation criterion).

Regarding Appendix A, MasOrange has carried out a physical climate risk assessment in line with the requirements of this Appendix A, as explained in the section “Description of the processes to identify and assess climate-related material impacts, risks and opportunities (ESRS 2 IRO-1)” (E1).

In the case of the delivery and collection of routers and decoders during the subscription period, MasOrange has confirmed that the associated eligible revenue and CapEx items are consistent with the requirements of Appendix C. Furthermore, Appendix B and the DNSH mitigation criterion are not applicable, given that MasOrange’s core business is the provision of telecommunications services, which does not involve energy generation of heating or cooling energy or show risks related to discharges or water stress.



Analysis of compliance with the minimum social safeguard criteria

While assessing alignment with the EU Taxonomy, MasOrange verified compliance with the minimum social safeguards set out in **Article 18 of Regulation (EU) 2020/852**. The analysis addressed four thematic blocks: Human rights, Corruption and bribery, Taxation and Fair competition.

■ Human rights

MasOrange embeds respect for human rights as a pillar of the governance and sustainability model. The **ESG strategy**, recognised by *Sustainable Fitch*, bolsters this commitment, focusing particularly on protecting vulnerable groups, especially children in the digital environment, and narrowing the digital divide through connectivity programmes. The Company provides its employees, suppliers and other stakeholders with a **Code of Ethics** containing principles of responsible conduct and respect for people, as well as a **Supplier Code of Conduct** to assess, oversee and monitor compliance with the UN Guiding Principles on Business and Human Rights, the International Labour Organisation (ILO) Declaration and the OECD Guidelines. This framework is implemented through ESG assessments that include regular audits and specific codes of conduct. Both are backed up by the **Ethics Channel**, an accessible, confidential mechanism allowing irregularities to be reported and ensuring these rights are protected in an environment of integrity and security.

Further information on this matter can be found in the sections on policies (S1-1, S2-1, S4-1) and processes to remedy negative impacts (S1-3, S2-3 and S4-3) in the chapters on Own workforce (S1), Workers in the value chain (S2) and Consumers and end-users (S4), as well as in the section on Corporate culture (G1-1) in the Business conduct chapter (G1).

■ Corruption and bribery

MasOrange applies a zero-tolerance approach to any form of bribery or influence peddling, as established in its Anti-Corruption Policy. This policy applies to employees and third parties linked to the Group, clearly defining prohibited conduct and fostering integrity and transparency in all activities, thereby reinforcing a corporate culture based on ethics and compliance. To boost this commitment, the Ethics Channel allows incidents and concerns to be reported confidentially, as mentioned above.

For further information, see the section on Prevention and detection of corruption and bribery (G1-3) in the Business conduct chapter (G1).

■ Taxes and taxation

MasOrange is firmly committed to full compliance with tax regulations, as set out in its Tax Policy. The Company bases tax management on responsibility and transparency, adopting best practices to prevent tax risks. Governance and supervision of the tax strategy are performed by the Group's administrative bodies, which integrate these principles into the internal ethics and control policies.

Further information on this matter can be found in the section on Corporate culture (G1-1) in the Business conduct chapter (G1).



- **Fair competition**

MasOrange, through its Competition Policy, focuses on ensuring strict compliance with competition law. The core objective is to prevent any infringement in this area and to promote honest, ethical, transparent professional conduct. Within this framework, the Company makes clear commitments to avoid illegal agreements, exchanges of sensitive information or any practice that could distort the market, thus consolidating an internal culture based on legality and integrity.

For further information on this matter, see the section on Corporate culture (G1-1) in the Business conduct chapter (G1).

Methodology and findings

On the basis of the eligibility and alignment analysis, MasOrange calculated the proportion of turnover, CapEx and OpEx pertaining to activities that meet the objectives of climate change mitigation and circular economy, in accordance with the provisions of **Delegated Regulation (EU) 2021/2178** and **Delegated Regulation (EU) 2023/2486 of 27 June**. Furthermore, in accordance with Annex I of **Delegated Regulation of 6 July 2021**, non-financial companies must disclose the percentage of turnover, capital expenditure (CapEx) and operating expenditure (OpEx) associated with eligible and aligned activities for all environmental goals during the 2025 financial year in a generic manner.

Proportion of turnover eligibility and alignment

Eligibility

The first indicator considered in the Taxonomy regulatory framework is turnover. Under section 1.1.1 of Annex I of **Delegated Act 2021/2178 of 6 July**, the numerator of this indicator is determined by the portion of net turnover from products or services, including intangibles, linked to economic activities that comply with the Taxonomy, while the denominator is revenue recognised in accordance with IAS ¹¹ 1, paragraph 82(a). Based on these definitions, the calculation was made as follows:

- **Numerator:** The revenue items linked to eligible economic activities were identified and calculated individually in accordance with the Taxonomy in order to arrive at the numerator. The eligibility indicator numerator was obtained by aggregating the eligible revenue from both activities.
- **Denominator:** MasOrange used the net revenue figure stated in the 2025 Consolidated Annual Accounts.

In 2025, MasOrange's revenue-generating activities were 8.1 "Data-processing, hosting and related activities" and CE 5.5 "Product-as-a-service and other circular use- and result-oriented service models". The eligibility percentage for the year was 3,05% (M€ 231).

¹¹ International accounting standard



Alignment

As indicated previously, the only aligned revenue-generating activity is CE 5.5, whose amounts relate to the router and decoder delivery and collection service. The alignment numerator includes only revenue from equipment that meets these applicable technical criteria. Aligned revenue therefore amounts to 0,74% (M€ 56).

Proportion of CapEx eligibility and alignment

Eligibility

The CapEx indicator is calculated following the EU Taxonomy criteria, based on investments in property, plant and equipment and intangible assets recognised during the financial year in accordance with applicable accounting standards (IFRS). This indicator reflects the proportion of investments linked to Taxonomy-eligible-or-aligned activities.

- **Numerator:** All investments related to Taxonomy-eligible economic activities were individually identified in order to calculate the numerator. So, the eligibility indicator numerator was determined by aggregating the CapEx relating to the investment items that meet the applicable technical criteria, only including additions that can be directly linked to those activities.
- **Denominator:** It includes all additions of property, plant and equipment and intangible assets recognised during the financial year, calculated before depreciation, amortisation and fair value changes, including additions as a result of the business combination, in line with: IAS 16 "Property, plant and equipment, paragraph 73.e); IAS 38 Intangible assets, paragraph 118.e); IAS 40 Investment property, paragraphs 76 and 79; IAS 41 Agriculture, paragraph 50; IFRS 16 Leases, paragraph 53.h).

As regards CapEx, MasOrange made investments in the following associated activities in 2025: CCM 7.2 / CE 3.2 "Renovation of existing buildings"; CCM 7.3 "Installation, maintenance and repair of energy efficiency equipment"; CCM 7.6 "Installation, maintenance and repair of renewable energy technologies"; CCM 8.1 "Data-processing, hosting and related activities"; and CE 5.5 "Product-as-a-service and other circular use- and result-oriented service models". Based on the investments identified in these activities and applying the EU Taxonomy criteria, the percentage of eligible CapEx for the year is 31,63% (M€ 608).

Alignment

As regards the breakdown by specific activity, the numerator includes, for activity CCM 7.3, aligned investments related to the installation or replacement of air-conditioning and heating equipment, although the amount was estimated because not all the models evaluated meet the technical selection criteria. For activity CCM 7.6, investments associated with the installation of solar panels are included in full, as all the equipment assessed meets the applicable criteria. Finally, in the case of activity CE 5.5, investments associated with routers and decoders for device management services are included in full, having verified that all of them meet the established technical criteria. In all cases, the absence of overlaps was verified so as to avoid any double counting. The CapEx alignment percentage for 2025 was 5,76% (M€ 110).



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Proportion of OpEx eligibility and alignment

The last Taxonomy indicator is OpEx. The total value of all economic activities linked to the Taxonomy does not reach the materiality threshold set out within that framework (**Delegated Regulation 2026/73** “Omnibus”). Similarly, due to the nature of this indicator and its lower significance compared to turnover and capital expenditure (CapEx) indicators, these expenses are classified as non-material and are therefore not disaggregated in this report.

FY 2025															
KPI	Total (M€)	Proportion of Taxonomy-eligible activities	Taxonomy-compliant activities (M€)	Proportion of Taxonomy-compliant activities	Breakdown of Taxonomy-compliant activities per environmental activity						Proportion of facilitating activities	Proportion transition activities	Unassessed activities considered to be non-material	Taxonomy-compliant activities (2024)	Proportion of Taxonomy-compliant activities (2024)
					Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity					
Turnover	7,599.25	3.05%	56.14	0.74%	—	—	—	0.74%	—	—	—	—	—	—	—
CapEx	1,924.43	31.63%	110.92	5.76%	—	—	—	5.76%	—	—	0.003%	—	—	—	—
OpEx	238.70	—	—	—	—	—	—	—	—	—	—	—	1.42%	—	—

Note: In accordance with the provisions of Delegated Regulation (EU) 2026/73, the Company does not present the simplified OpEx table, given that the taxonomy-eligible activities with associated OpEx do not individually exceed the 10% threshold set out in the regulation for requiring the disclosure of eligibility. The analysis conducted confirms that none of the activities included within the assessment perimeter reach this limit, which allows the entity to rely on the exemption provided for in the regulation. The alignment percentage for the financial year is 0%.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

KPI (turnover)													
FY 2025													
Economic activities	Code	Taxonomy-eligible KPI (proportion of Taxonomy-eligible turnover)	Taxonomy-compliant KPI (monetary value of turnover) (M€)	Taxonomy-compliant KPI (proportion of Taxonomy-compliant turnover)	Environmental objective of Taxonomy-compliant activities						Facilitating activity	Transition activity	Proportion of Taxonomy-eligible KPI that is Taxonomy-compliant
					Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity			
Data-processing, hosting and related activities	CCM 8.1	0.07%	—	—	—	—	—	—	—	—		T	—
Product-as-a-service and other circular use- and result-oriented service models	CE 5.5	2.98%	56.14	0.74%	—	—	—	—	0.74%	—			24.79%
Sum of alignment per objective					—	—	—	—	0.74%	—			
Total KPI (turnover)		3.05%	56.14	0.74%	—	—	—	—	0.74%	—	—	—	24.24%



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

KPI (CapEx)													
FY 2025													
Economic activities	Code	Taxonomy-eligible KPI (proportion of Taxonomy-eligible CapEx)	Taxonomy-compliant KPI (monetary value of CapEx) (M€)	Taxonomy-compliant KPI (proportion of Taxonomy-compliant CapEx)	Environmental objective of Taxonomy-compliant activities						Facilitating activity	Transition activity	Proportion of Taxonomy-eligible KPI that is Taxonomy-compliant
					Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity			
Renovation of existing buildings	CCM 7.2 / CE 3.2	0.04%	—	—	—	—	—	—	—	—		T	—
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0.03%	0.01	0.0003%	0.0003%	—	—	—	—	—	E		0.80%
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	0.002%	0.04	0.002%	0.002%	—	—	—	—	—	E		100.00%
Data-processing, hosting and related activities	CCM 8.1	0.05%	—	—	—	—	—	—	—	—		T	—
Product-as-a-service and other circular use- and result-oriented service models	CE 5.5	31.51%	110.87	5.76%	—	—	—	—	5.76%	—			18.29%
Sum of alignment per objective					0.003%	—	—	—	5.76%	—			
Total KPI (CapEx)		31.63%	110.92	5.76%	0.003%	—	—	—	5.76%	—	0,003%	—	18.22%



Climate change (ESRS E1)

MasOrange, as a company committed to sustainability, recognises that the fight against climate change has gained global attention and that, despite progress in agreements and regulatory measures, there is still a long way to go to reach a sustainable future. In this context, the Group understands the impact it has on the environment and the need to contribute to mitigating its effects. Although the telecommunications sector is not considered a high-climate-impact industry, it can play a key role in developing solutions that support a more sustainable economy.

So, aware of its responsibility in this area, MasOrange has strengthened its role in promoting digitalisation as a catalyst for the transition to a greener economy. Thanks to its ability to interconnect people, businesses and industries, the Group can help stimulate greater use of renewable energy, enhance energy efficiency and reduce the carbon footprint. Its position in the business environment also means the Company can be an essential facilitator for other undertakings to implement solutions that cut resource consumption, waste and emissions through connectivity and digitalisation.

Key indicators

Strategic pillar	Topics	2025 milestones
Energy and climate change	Climate change mitigation	Decarbonisation plan development
		100% of direct emissions offset
		100% of direct power consumption from renewables
	Climate change adaptation	Climate risk analysis
		ISO 14001: Environmental management systems
	Management system certifications	ISO 14064: Greenhouse Gas Certification
		ISO 50001: Energy Management Systems
		EMAS system: European Eco-Management and Audit Scheme



Governance

Integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3)

MasOrange embeds aspects of climate change and sustainability into its corporate culture in various ways, including the assignment of responsibilities within its governance structure, development of specific policies and procedures, and inclusion of ESG targets in employees' variable incentives. Further information on the responsible management model can be found in the section "The role of the administrative, management and supervisory bodies (GOV-1)".

As mentioned above, MasOrange's Board directors do not receive any remuneration or per diems for holding office.

Variable remuneration linked to climate change aspects

MasOrange had a short-term incentive scheme for 2025, applicable to the Group's entire workforce and favouring the achievement of corporate goals. The scheme was designed to make sure that the remuneration criteria for all members of the Group, including the governing bodies, are aligned with the business strategy, value creation and long-term interests and sustainability.

Specifically, one of the objectives linked to sustainability in this incentive scheme addresses the Group's environmental impact. This goal, compliance with which is verified by an external entity, includes aspects such as carbon emissions, energy efficiency, resource use and biodiversity impact.

Further details of the incentive scheme are provided in the section "Integration of sustainability-related performance in incentive systems (GOV-3)" in the General disclosures chapter (ESRS 2).



Strategy

Material impacts, risks and opportunities and their interaction with strategy and business model(s) (ESRS SBM-3).

In 2025, MasOrange undertook a resilience analysis to assess its ability to adjust and adapt strategy and the business model to climate change in the short, medium and long term. This approach allows a comprehensive assessment of the potential adverse and positive effects of climate change on the Company, as well as identifying adaptation and mitigation measures that minimise negative and maximise positive effects.

Both physical and transition risks and opportunities linked to climate change were evaluated:

- **Physical risks** are effects of climate change that can manifest themselves through extreme (acute) events or long-term (chronic) changes in weather patterns.
- **Transition risks** are impacts associated with the transformation of the economy and society towards a low-emission model, including regulatory, technological and market changes.

To identify these risks and opportunities, MasOrange consulted the list of climate threats and transition events included in Appendix A of the Taxonomy and ESRS 2 IRO-1 AR11 and AR12 of the CSRD. MasOrange's material risks and opportunities are set out below:

Type	Risk / Opportunity
Physical risk	Higher costs of repairing, maintaining and commissioning fixed network, mobile network and store network assets due to physical damage.
Transition risks	Changing expectations of business customers, lenders and shareholders regarding sustainability. Reputational risk due to the failure to meet GHG emission mitigation commitments. Reduction in operating costs through self-generation and energy efficiency in operations.
Transition opportunities	Development and marketing of products and services to decarbonise other industries. Development of products and solutions for climate crisis management and operational resilience.

Physical risks

MasOrange identified the potential impact of physical risks on its infrastructure, fixed network, mobile network and store network in the event of extreme weather conditions, which could push up repair, maintenance and asset replacement costs, since a large part of the network components are external and broadly distributed across the country, making them inherently exposed to weather conditions and adverse meteorological phenomena.



Transition risks and opportunities

Transition risks include, most notably, potential changes in the sustainability expectations of business customers, financiers and shareholders in a context in which regulatory and market priorities are constantly evolving. Also, the Company recognises reputational risk associated with meeting its GHG emission reduction commitments, particularly in relation to Scope 3, over which MasOrange has more limited control.

In parallel, MasOrange identified significant climate change-related opportunities. They include cutting operating costs through self-generation and enhancing energy efficiency in operations, leveraged by the initiatives defined in its Transition Plan.

The Company also sees potential in the development and marketing of technology solutions that help decarbonise other sectors. The deployment of 5G Stand-Alone technology will enable new use cases based on the integration of IoT, Artificial Intelligence and Edge Computing for environmental protection, such as real-time monitoring of carbon footprints, pollution measurement, smart traffic management and fire prevention and control using drones. Similarly, the Group is promoting the development of products and solutions aimed at climate crisis management and improvements in operational resilience, such as the ongoing project for early fire detection based on Artificial Intelligence and the Group's connectivity.

Business Continuity Management System

To boost the Group's operational and strategic resilience, MasOrange has a Business Continuity Management System (BCMS) geared towards cycle-by-cycle continuous improvement. The BCMS includes risk analyses, response plans and strategies, and resilience controls specifically addressing climate risks so as to prevent impacts and favour recovery when they occur.

The recent large-scale natural disasters (torrential rains in Valencia in October 2024 and forest fires in the summer of 2025) have shown that this approach will heighten the Company's preparedness and resilience in the face of extreme events. For further information, see the section "Material impacts, risks and opportunities and their interaction with strategy and business model(s) (SBM-3)" in the General disclosures chapter (ESRS 2).

The business continuity risk analysis took account of the most critical B2C and B2B services, essential customer journey processes and the most relevant support processes for the Group. Physical risks were not excluded from this analysis. The catalogue of risks assessed includes climate and natural disaster threats, for which control measures, strategies and continuity and recovery plans are proposed.

To carry out this analysis, MasOrange defined a Business Continuity Risk Management Methodology, as the official continuity risk management document. It defines the principles, processes and roles involved in identifying, analysing, assessing and treating risks that may affect the organisation's operational continuity. The methodology also includes criteria for assessing impact and probability, describes the governance and reporting model, and details response strategies (mitigation, acceptance, transfer or elimination) reflecting the acceptable risk level approved by management. Risk management is embedded in the corporate system and the ISO 22301 standard, ensuring coordination between areas and continuous improvement. This analysis is regularly updated to ensure objectivity and accuracy, thus reducing business uncertainties.

The most recent resilience risk analysis identified risks of various kinds, highlighting supply chain failures, cyberattacks, failures affecting network and system technology, vandalism and sabotage of infrastructure, as well as natural disasters. The unavailability of critical infrastructure and services due to disruptive events such as natural disasters, which could affect data centres or critical infrastructure, leaving customers without service, was also analysed.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

MasOrange recognises that climate change can affect a telecommunications company such as the Group in multiple ways. The most relevant phenomena include:

- **Damage to infrastructure** due to extreme weather events, such as torrential rain, flooding and storms, which impact telecommunications towers and essential infrastructure.
- **Power outages**, since networks depend on a constant flow of energy and prolonged blackouts compromise service continuity.
- **Increased operating costs** caused by the need to reinforce infrastructure and deploy resilience measures such as more robust technologies and backup power systems.
- **Impact on the supply chain** of disruptions in the production and transport of equipment and materials, delaying projects and maintenance.
- **Changes in demand for services**, with sudden increases in emergency situations that test the network's capacity.

Risks and opportunities identified in the double materiality analysis

In the double materiality analysis carried out in 2024, MasOrange already identified various material risks and opportunities associated with climate change, which are aligned with the key aspects identified in the climate risk analysis carried out in the current financial year.

The main risks include higher energy costs triggered by growing data traffic and heightened network demand, as well as exposure to natural disasters and the effects of climate change, which could lead to asset loss and a decline in productivity.

Opportunities include developing solutions based on 5G, IoT and Cloud technologies, which could enable customers to adapt to the effects of climate change while optimising the use of resources. Adopting more energy-efficient technologies could help to improve the corporate reputation by accelerating the achievement of GHG emission reduction targets and goals, as well as bringing down operating costs.



Impact, risk and opportunity management

Climate action plan for climate change mitigation (E1-1)

MasOrange has a Climate Action Plan that analyzes climate risks and describes how the Group is transitioning to a sustainable business model. In 2025, as part of this plan, MasOrange drew up a Decarbonisation Plan (2024-2040) defining the actions needed to meet the emission reduction targets set for 2030¹² and 2034, to reach net-zero greenhouse gas (GHG) emissions by 2040. The targets have been defined using the 2024 financial year as the baseline and the timeframes established by the SBTi. This Plan, which meets the CSRD requirements for a Transition Plan, was presented to the Management Committee at the ESG SteerCo and approved by the Board of Directors together with the preparation of this Report.

To define these targets, the Group used the approach established by the Science-Based Targets Initiative (SBTi) as a reference, ensuring short-term alignment with limiting global warming to 1.5 °C for Scope 1 and 2 emissions and with the WB2C (Well Below 2°C) pathway for Scope 3 emissions, in line with the Paris Agreement; and long-term compatibility with limiting global warming to 1.5 °C for the entire carbon footprint.

The Decarbonisation Plan is MasOrange's roadmap for reducing both direct and indirect emissions associated with the Group's value chain. The plan identifies the action areas and levers with associated actions.

¹² MasOrange has established an interim target within the SBTi pathway.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Scope	Decarbonisation levers	Actions
Fleet	Renewal of the vehicle fleet with low-emission technologies.	Increased electrification of the vehicle fleet. Refuelling with renewable fuels.
Network	Supply of low-emission energy to network sites.	Reduction in electricity consumption associated with the shutdown of MASMOVIL nodes to migrate customers to Orange. Use of renewable electricity by TowerCos.
Operations / Buildings	Purchase of network equipment ensuring a low life-cycle impact.	Purchase of network equipment applying low life-cycle impact criteria.
	Contracting of low-emission network services.	Inclusion of low-emission criteria in the contracting of services.
	Reduction in the global warming potential of refrigerants in air-conditioning systems.	Replacement of air-conditioning refrigerants with gases that have a low global warming potential in our own network and buildings.
Devices	Offering of more sustainable devices.	Put in place a device approval system that allows us to gradually shift our product catalogue towards a predominantly sustainable offering. Include reconditioned devices in our sales offering. Increase the ratio of reconditioned routers and decoders.
Procurement	Application of sustainability requirements for the purchase of low-emission goods and services.	Implementation of specifications for the purchase of equipment, supplies and consumables with low emissions throughout their life cycle and for the contracting of low-emission services.
	Promotion of carbon footprint reduction commitments by certain suppliers.	Suppliers' adherence to SBTi.
Logistics	Optimisation of customer delivery logistics.	Grouping of orders for in-store delivery. As a short-term goal, the Group has set a target for 2027 for the use of this delivery method by customers for mobile devices.
	Reduction of last-mile emissions.	Definition of sustainability specifications for logistics operators. Use of low-emission vehicles and renewable fuels, mainly in end-distribution light vehicles.

Besides the levers and actions described above, the Group remains committed to purchasing 100% of power consumed under a renewable origin guarantee.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

The following table shows emission reduction projections under the decarbonisation roadmap described above:

Projections	Base year (2024)	Short term (2030)		Intermediate (2034)		Long term (2040)	
	t CO ₂ e	t CO ₂ e	%	t CO ₂ e	%	t CO ₂ e	%
Scope 1 emissions	5,814	3,561	-41%	2,510	-59%	837	-90%
Scope 2 emissions	0	0	—%	0	—%	0	—%
Scope 3 emissions	653,025 ¹³	663,577	2%	496,460	-35%	213,928	-90%

(*) MasOrange's GHG emissions inventory was drawn up under the GHG Protocol.

(**) A base year (2024) was defined to enable objective measurement of the GHG reduction progress.

While developing the Decarbonisation Plan, MasOrange undertook an internal assessment of potential locked-in emissions, concluding that, as MasOrange's assets and the products it markets use electricity to operate, and considering that both the Company and the Spanish power system are moving towards a renewable energy matrix, the locked-in emissions associated with these key assets and products are insignificant and will not compromise the goal of achieving net-zero emissions by 2040.

This plan is embedded in and harmonised with MasOrange's general strategy¹⁴ and financing planning. MasOrange also applies ESG criteria in its procurement process and continues working to integrate the specific criteria established by the EU Taxonomy for sustainable investments into its financial decision-making process.

Finally, MasOrange has a Decarbonisation Plan and a roadmap to achieve Net Zero by 2040. For further information on the actions taken in 2025 and forward-looking climate change mitigation goals, see the sections "Actions and resources in relation to climate change policies (E1-3)" and "Targets related to climate change mitigation and adaptation (E1-4)".

¹³ The Scope 3 figure for 2024 was adjusted to reflect the update of emission factors and a scope change in Scope 3, category 1.

¹⁴ MasOrange does not engage in economic activities related to coal, oil or gas.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Description of the processes to identify and assess climate-related material impacts, risks and opportunities (ESRS 2 IRO-1)

As regards the process followed by MasOrange to identify material impacts, risks and opportunities, see the section “Description of the processes to identify and assess material impacts, risks and opportunities (ESRS 2 IRO-1)”, which describes the four phases of the double materiality analysis: understanding, identification, assessment and determination.

In the double materiality analysis carried out in 2024, MasOrange identified various material impacts, risks and opportunities related to climate change. The following chart indicated where in the value chain they originate, their effect and their link to the Group's strategy or business model:

Topic	Value chain	Brief description and effects of the IROs	Environmental effect	Link to strategy
Energy efficiency and renewables	Own operations	Actual short-term positive impact: MasOrange consumes 100% power from renewable energy sources.	Reduction of GHG emissions.	Alignment with the sustainability strategy
		Potential medium-term risk: MasOrange uses a 5G connection which, despite consuming less energy than other types of connection, could pose a risk due to increased energy costs as data traffic and network demand grow.	N/A	Costs associated with energy consumption in activities.
	Downstream phases	Actual short-term negative impact: MasOrange offers services that require a large amount of energy, in many cases on a constant basis.	High energy consumption.	Service offering intrinsic to MasOrange's activity
	Entire value chain	Actual short-term negative impacts: - The telecommunications industry consumes more and more energy due to new technologies (content, AI, etc.). - MasOrange and third parties with which it collaborates use data centres to power critical hardware and IT infrastructure, consuming a large amount of energy.	High energy consumption.	Service offering intrinsic to MasOrange's activity



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Topic	Value chain	Brief description and effects of the IROs	Environmental effect	Link to strategy
Climate change mitigation (GHG)	Own operations - Own data and network infrastructure	Actual short-term positive impacts: - MasOrange has a strategy to combat climate change and enhance energy efficiency based on the ESG Strategic Plan and the integrated environment and energy policy, among other aspects. - MasOrange is committed to combating climate change and has an energy efficiency strategy in place: network sharing with third parties, obsolescence and renewal plans for air-conditioning and heating equipment, power saving features, more efficient buildings, monitoring of network energy management and increased energy efficiency in Data Processing Centres, among other measures. - MasOrange is working on various strategic lines to reduce its emissions (Scopes 1, 2 and 3) through action plans that include: installing photovoltaic panels and smart configurations that turn off idle equipment, replacing refrigerant and extinguishing gases with lower-environmental-impact alternatives in Data Processing Centres, switching from B diesel to biodiesel and natural gas, and circular economy initiatives.	Reduction in energy demand and prevention of GHG emissions	Alignment with the sustainability strategy
	Own operations - Own data and network infrastructure	Actual short-term negative impact: MasOrange uses non-renewable energy in its own operations (diesel consumed in generators to guarantee the power supply in buildings, company vehicles, etc.), generating greenhouse gas emissions.	Generation of GHG emissions.	Energy consumption inherent to the Group's activity
Climate change mitigation (GHG)	Own operations - Own data and network infrastructure	Potential short-term opportunity: MasOrange could turn the development of solutions based on 5G/IoT/Cloud technologies that enable customers to adapt to or mitigate the effects of climate change and optimise the use of resources into an increase in revenue and business diversification.	N/A	Strategic focus of the Group's service offering
	Later phases - Use of goods and services	Actual short-term positive impact: MasOrange and the telecommunications industry play an active role in reducing the carbon footprint by facilitating teleworking for companies, administrations and workers, which minimises travel.	Prevention of GHG emissions by employees.	Consequences of the services offered by MasOrange
Climate change adaptation	Later phases - Use of goods and services	Actual short-term negative impact: The exponential growth in the use of products and services by MasOrange's consumers and end-users requires a large amount of energy, which generates GHG emissions.	Generation of GHG emissions.	Increased use by customers of the services offered by MasOrange
	Own operations - Own data and network infrastructure	Potential medium-term opportunity: MasOrange could leverage the use of more energy-efficient technologies to enhance its reputation by accelerating the achievement of GHG emission reduction targets and goals, as well as cutting operating costs.	N/A	Alignment with the sustainability strategy
	Own operations - Own data and network infrastructure	Potential medium-term risk: MasOrange's operations could be exposed to natural disasters and the effects of climate change, such as hurricanes or floods, which could damage infrastructure, causing the loss of assets and productivity, as well as higher repair costs and lower revenues due to interruptions.	N/A	Possible interruptions of the Group's normal activities



Climate risk analysis methodology¹⁵

MasOrange analysed its climate change management by identifying and assessing physical and transition risks, as well as opportunities. The analysis process was integrated using a 4-pillar methodology: risk identification, definition of time horizons and selection of climate scenarios, calculation of inherent risk considering exposure and vulnerability, and estimation of residual risk based on mitigation capacity in the case of transition risks, and adaptation capacity in the case of physical risks. MasOrange is currently continuing this analysis to further quantify the financial effects associated with the different climate scenarios and events, thus ensuring the integration of these impacts into strategic planning and risk management.

Three analysis time horizons were defined:

- **Short term:** 2030.
- **Medium term:** 2040.
- **Long term:** 2050.

These milestones enable the evolution of physical risks to be assessed under different climate scenarios and consistency with the Company's strategic objectives and with European and international regulatory frameworks to be assured. In this context, MasOrange has set itself the goal of net-zero emissions by 2040, in line with the industry's commitment, while 2050 is the horizon set by the European Union for achieving climate neutrality.

Physical climate risks

Two internationally recognised scenarios were used for the climate risk analysis:

- **RCP 2.6** (aligned with limiting global warming to 1.5 °C).
- **RCP 8.5** (high-emissions scenario).

Both are taken from the projections of the Intergovernmental Panel on Climate Change (IPCC) and are harmonised with the most advanced scientific information, ensuring consistency with the methodologies recommended by international organisations and European regulatory frameworks.

The RCP 2.6 scenario is usually presented as the lowest-emissions scenario, characterised by stable GHG emission levels until 2020, which subsequently decrease to become negative in 2100. Based on current trends in global GHG emissions, this path seems highly unlikely.

In contrast, the RCP 8.5 scenario represents a reasonable worst-case scenario and is widely used for climate risk assessment and stress testing. RCP 8.5 was specifically selected as a high-impact baseline scenario and was not intended to be presented as the most likely outcome of a "business as usual" scenario without policies.

As mentioned previously, **Taxonomy Appendix A and ESRS E1 AR11** were used as a reference to identify the hazards applicable to MasOrange, classifying them in the two established categories of acute and chronic. Assets that are critical from a business continuity viewpoint were considered, as

¹⁵ This analysis, which includes different scenarios and time horizons, was carried out using the "EY CAP" tool, which analyses the exposure of assets to climate events, assessing exposure to climate risk.



well as mobile and fixed network assets and the network of stores distributed throughout Spain, allowing for a solid, comprehensive representation of the risk by associating each hazard with the relevant asset type so as to differentiate the potential impacts assessed.

MasOrange has assessed the **exposure and vulnerability** of its assets to climate-related hazards over the different time horizons described and in the reference scenarios, combining climate data with specific information on the Company's assets, including location, operational features and economic relevance, as well as other variables such as energy consumption or energy prices associated with each type of asset, in order to calculate the financial impact, probability, magnitude and duration of these hazards. The hazards considered are the result of an in-depth study that includes geospatial coordinates to assess exposure and vulnerability. The expected useful life of assets takes account of the time horizons used, which are aligned with strategic and capital allocation plans. This consistency allows risk management and decision-making to be embedded throughout the useful life of the assets.

The spatial resolution used to calculate exposure was based on public information from sources such as Aqueduct and the European Soil Data Centre, among others, which provide consistent, high-resolution data on risk factors such as water stress. This approach makes it possible to ascertain how assets may be exposed or sensitive to various climate-related physical hazards, generating gross physical risk information for MasOrange. Vulnerability was assessed in line with corporate risk analysis parameters, addressing the various types of impact associated with climate hazards in a structured way. For each scenario and type of damage identified, **three main dimensions** were analysed:

- Revenue impact.
- Other causes having financial repercussions (such as repair costs or higher operating costs).
- Implications for business continuity, including the impact on customers and operations.

Climate transition risks

MasOrange assessed the transition risks and opportunities to which it is exposed by analysing the Group's main economic activities, specifically telecommunications services (fixed network, mobile network, products and services marketed, and goods and services purchased and acquired).

For transition risks and opportunities, the scenarios of the International Energy Agency were used as a reference. This scenario-based approach relies on the Global Energy and Climate Model (GEC) to examine future trends. The two scenarios used throughout the transition opportunities and risks analysis process are:

- **Stated Policies Scenario (STEPS)**, equivalent to SSP1 - 2.6.
- **Net-Zero Emissions 2050 (NZE)**, equivalent to SSP1 - 1.9.

For this analysis, the probability and magnitude of transition events are understood to be determined by the socio-economic variables extracted from the scenario.

Both scenarios are exploratory, not predictive, and are based on the latest scientific evidence from the IPCC and detailed energy modelling. STEPS reflects the evolution of the global energy system under current or announced policies, without incorporating aspirational climate targets that are not



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

backed by regulations. It acts as a realistic reference scenario, but one that is incompatible with the Paris Agreement, as it leads to an increase in global average temperature of around 2.5 °C by the end of the century.

For its part, NZE translates the goal of limiting global warming to 1.5 °C into a technically feasible pathway to climate neutrality by 2050. It calls for immediate, swift emission reductions, achieving a drop of approximately 50% by 2035 and net-zero emissions by 2050. The power industry is leading this transformation through a massive expansion of renewable energies, networks, storage and a more prominent role for nuclear and hydroelectric power.

In this context, the European Union is promoting a profound transformation of its energy system to meet ambitious climate targets, strengthen energy security and maintain competitiveness. The transition is based on electrification, accelerated deployment of renewables and enhanced energy efficiency, focusing particularly on industry and hard-to-abate sectors, in view of the 2035 and 2040 targets.

Although the International Energy Agency's scenarios provide a coherent, scientifically robust framework with high methodological traceability, they have limitations in terms of national granularity and sectoral specificity. For this reason, they were supplemented by internal modelling designed to more accurately reflect the reality of the Spanish energy system and the specific characteristics of the business. In any case, the effective materialisation of the trajectories described in each scenario is neither automatic nor guaranteed, but is decisively conditioned by the degree of ambition, coherence and stability of public policies, especially at the European Union level and, specifically, in Spain, as well as by the ability to implement the regulatory, investment and social acceptance frameworks necessary to sustain the energy transition.

ESRS E1 AR12 was taken as a reference to identify transition events applicable to MasOrange, classifying them according to the four established categories: policy and legislation, technology, market and reputation. The Group assessed the future evolution of current impacts and business activities, taking into account the parameters of probability, magnitude and duration of the events identified.

No assets or activities were identified that are incompatible with the transition to a carbon-neutral economy. As a telecommunications operator, the Company's industry plays a facilitating role in the climate transition, both through the continuous improvement of energy efficiency in its networks and through the development of digital services that help cut emissions in other economic sectors, as outlined in the opportunity analysis described above. Even so, the analysis of transition risks and opportunities allows MasOrange to anticipate adaptation needs and bolster the initiatives that support this process.

Finally, it should be noted that the climate scenarios used are compatible with the basic climate assumptions used in the CAA (see the CAA, section "1.10.3 Consideration of climate change risks").



Polices related to climate change mitigation and adaptation (E1-2)

MasOrange has various climate-change-related policies reflecting the Group's commitment to climate change mitigation and adaptation, energy efficiency and the use of renewable energy. With these policies, MasOrange manages all of its impacts, whether positive or negative, and material risks related to climate change. To ensure awareness of these policies and foster access to training and skill-building, the Company makes MasOrange Campus available to all employees.

ESG Policy

The ESG Policy sets out the fundamental principles and general framework for managing sustainability practices. It embeds social responsibility into MasOrange's business model and fosters sustainable value, respect for the environment, the fight against climate change through mitigation and adaptation, and the use of renewable energies. The policy also promotes responsible management of ESG impacts, risks and opportunities.

Approved by the Board of Directors, the policy is available on the Group's website and applies to all the Group companies.

Environment and Energy Policy

The Environment and Energy Policy lays down the framework for environmental management at MasOrange, in line with the ESG Strategic Plan. It also includes the principles of continuous improvement, energy efficiency, circular economy, biodiversity protection and regulatory compliance. This policy was approved by the Group's CEO and is available on the corporate website. It is applicable to all the Group companies and all the Company's activities and departments.

Business Continuity Policy

The Business Continuity Policy contains MasOrange's Business Continuity Management System guidelines, ensuring the availability and continuity of operations in the event of incidents or disasters. It describes the approach based on risk identification, assessment and management, including environmental, climate, technology, cybersecurity, physical and human health and safety threats. The policy was approved by the Group's CEO and is available on the corporate website, applying to all Group employees, certain suppliers, processes, technology systems and infrastructure.



Other relevant mechanisms

Environment and Energy Management System

The Environmental and Energy Management System reflects MasOrange's commitment to environmental management across all its undertakings. It is based on ISO 14001, ISO 14064, ISO 50001 and EMAS regulations, ensuring that the highest environmental standards and current legal regulations are observed. The system is also externally certified and audited annually to promote continuous improvement.

Registration in the Carbon Footprint Registry

The Group has obtained, for the 2024 Carbon Footprint, the “Calculate and Reduce” seal, an accreditation granted by the Spanish Office of Climate Change under the Ministry for Ecological Transition and the Demographic Challenge, for its subsidiaries Orange Espagne S.A.U. and Euskaltel, S.A.U. Likewise, R Cable and Telecable Telecomunicaciones, S.A.U. have also been certified with the “Calculate” seal. This certification scheme identifies three levels of participation on annual basis: carbon footprint calculation, reduction, and offsetting.

Actions and resources in relation to climate change policies (E1-3)

In 2025, MasOrange undertook numerous climate-change-related initiatives¹⁶ aimed at generating positive impacts and leveraging opportunities, as well as preventing negative impacts and implementing risk mitigation measures.

It is important to point out that MasOrange had already been working on climate change initiatives prior to the 2024-2040 Decarbonisation Plan. This plan now allows these initiatives to be structured, prioritised and accelerated, but many of the initiatives reported in 2025 originated in the Group's previous efforts in relation to energy efficiency, renewable energy, the circular economy and technological innovation.

The scope spans all phases of the value chain (upstream, own operations and downstream) and all the initiatives are aligned with the Group's corporate policies and contribute to its strategic objectives.

To ensure traceability to the actions listed in section E1-1 (Decarbonisation Plan), some of the measures included in the plan, though approved and planned in 2025, are scheduled to begin in 2026.

Infrastructure

MasOrange guarantees that 100% of the power consumed in its own supplies is from **renewable sources with a Guarantee of Origin (GO)**. The Group combines two mechanisms:

- Long-term power purchase agreements (PPAs), which ensure the traceability and stability of the renewable supply under certain contracts.
- Purchasing of certified renewable energy, backed by Guarantees of Origin issued by suppliers in all other cases.

¹⁶ The actions listed below will be included, where appropriate, in the relevant Taxonomy activities and related key performance indicators. This information can be found in the EU Taxonomy section (eligible and aligned activities).



The Group is streamlining its architecture to eliminate duplication and maximise the efficiency of existing resources.

This strategy boosts transparency, ensures supply continuity and reduces dependence on non-renewable sources, complying with decarbonisation commitments and traceability requirements under European regulations.

The Group is working to reduce Scope 3 emissions, having reached agreements with some suppliers so that 46% of power consumed will come from renewable sources by 2025, the aim being to reach 100% by 2040 throughout the upstream phases of the value chain.

Data processing buildings and centres

As regards cutting greenhouse gases, MasOrange has a programme for the renewal of technical air-conditioning and heating equipment, which consists of replacing equipment that is more than 15 years old in order to enhance energy efficiency and reduce Scope 1 emissions in its own operations.

The Group has also replaced fluorescent lighting with LED technology in its Derio offices to help bring down electricity consumption. This contributes to the optimisation of energy consumption in the office area and to heightened efficiency.

MasOrange has installed solar photovoltaic panels on rooftops for self-consumption in 23 buildings. This boosts self-consumption of renewable energy at the Group's sites, reduces the amount of grid energy consumed and enhances energy efficiency.

Network

MasOrange is also shutting down HFC nodes¹⁷ as part of the project to migrate fixed access to FTTH (Fibre to the Home)¹⁸. This technology is more resilient to climate factors such as humidity and electrical storms, meaning greater continuity and stability of communications services in adverse conditions, as well as cutting energy demand by eliminating duplicate networks and using more efficient equipment. In 2025, 501 power supplies have been deactivated.

MasOrange has also worked on optimising and consolidating the MMV mobile network infrastructure¹⁹, having shut down 4,652 nodes in 2024 and 2025. In doing so, the Group is streamlining its architecture to eliminate duplication and maximise efficiency in the use of existing resources. Simplifying the topology and integrating capabilities increases resilience and flexibility, and reduces operational and maintenance complexity. This speeds up deployment and improves network performance.

In terms of operational efficiency, MasOrange has deployed Open RAN-compatible equipment²⁰ so as to transform its network to allow upgrades without replacing the entire infrastructure. Modularity and interoperability between multiple suppliers increase resilience and flexibility and reduce dependence on a single manufacturer. This speeds up deployment and improves response times in the event of natural disasters and other emergencies.

¹⁷ HFC (Hybrid Fibre Coax) is a technology that combines fibre optics and television cable to bring high-speed internet, TV and telephony to the home.

¹⁸ FTTH is an access technology that brings fibre optics directly to the home to offer high-speed, low-latency internet.

¹⁹ The MMV network is MasOrange's mobile network that uses equipment from different manufacturers working together as a single, more efficient and reliable network.

²⁰ Open RAN-compatible equipment is mobile network equipment that uses open standards (public technical standards that anyone can use) to work together, even if they are from different manufacturers.



Mobile devices

As regards energy labels on the devices marketed by the Group, MasOrange has implemented [device identification and energy classification information](#). This is in line with current legislation, enabling the Group to provide clear information on the consumption of different devices, and allowing customers and users to understand and compare efficiency.

Logistics

In terms of mobile devices, MasOrange has a logistics efficiency strategy to reduce emissions associated with deliveries by promoting in-store collection rather than courier delivery.

This initiative entails consolidating stock at points of sale and digitalising logistics processes. Besides improving customer experience, this more environmentally friendly type of delivery reduces the number of individual shipments, optimises use of reusable bags and minimises the risk of fraud, thus benefiting consumers.

Metrics and targets

Targets related to climate change mitigation and adaptation (E1-4)

As mentioned previously, in MasOrange drew up its Decarbonisation Plan (2024-2040) in 2025. To ensure compatibility with limiting global warming to 1.5°C, the Group requested external validation of these targets by the SBTi²¹. The levers and the targets set by MasOrange are described in the section “**Transition plan for climate change mitigation (E1-1)**”. MasOrange also has short-term climate change mitigation targets:

Strategic pillar	Topics	Description of the target and aspiration for 2027-2040
Energy and climate change	Climate change mitigation	41% Scope 1 emissions reduction by 2030 90% Scopes 1, 2 and 3 emissions reduction by 2040 100% offset of GHG emissions (Scope 1) 100% renewable power v. total direct consumption Energy consumption (Gwh) <224 96% renewable energy v. total energy
	Climate change adaptation	Implementation of the Adaptation and Resilience Plan

²¹ So far, the targets had been set internally.



Energy consumption and mix (E1-5)

MasOrange's commitment to the environment plays a key role in the efficient use and consumption of power and fuel. The Group makes use of the environment and energy management system to systematise the measurement and assessment of activities carried out and identify improvement opportunities.

There follows information on MasOrange's energy consumption in its own operations, showing the sources: fossil, nuclear or renewable:

Total energy consumption (MWh) ²²	2025	2024	% variation
Total fossil energy consumption (MWh)	8,187.96	8,079.00	1.35%
Consumption of fuel from fossil sources (MWh)	8,058.38	7,947.00	1.40%
Natural gas consumption (MWh)	129.57	132.00	-1.84%
% proportion of fossil sources in total energy consumption	3.76%	3.61%	4.30%
Total nuclear energy consumption (MWh)	0.00	0.00	-
% proportion of nuclear sources in total energy consumption	—%	—%	-
Total renewable energy consumption (MWh)	209,481.85	215,924.00	-2.98%
Consumption of fuel from renewable sources such as biomass, biofuel, biogas, renewable hydrogen (MWh)	389.88	495.00	-21.24%
Consumption of power, heat, steam and cooling from renewable sources (MWh)	204,603.66	215,429.00	-5.03%
Consumption of self-generated renewable energy not used as fuel (MWh)	4,488.31	0.00	-
% proportion of renewable sources	96.24%	96.39%	-0.16%
Total energy consumption (MWh)	217,669.80	224,003.00	-2.83%

²² MasOrange operates in an industry considered not to have a high climate impact.

[Executive summary](#)[General disclosures](#)[Environmental information](#)[Social information](#)[Information on governance](#)[Appendix](#)

The following information refers to the energy produced by MasOrange:

Energy production (MWh)	2025
Renewable energy production (MWh)	4,488.31
Non-renewable energy production (MWh)	839.52
Total energy production (MWh)	5,327.83

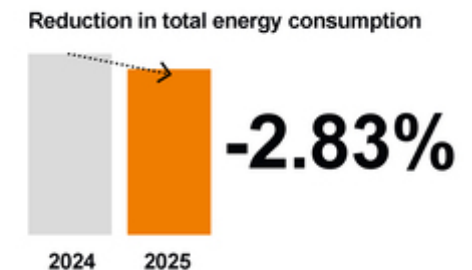
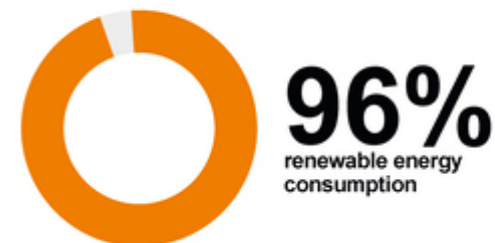
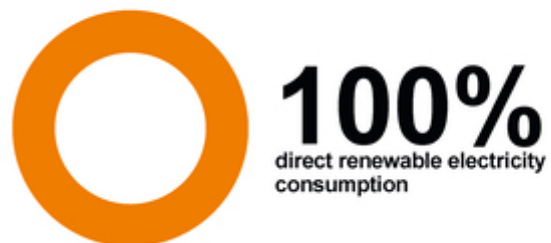
Calculation method and assumptions

Energy consumption is calculated based on power, natural gas and fuel consumption in fixed and mobile sources (for vehicles and generators), these being the emissions sources included in the GHG inventory related to energy.

In the case of electricity and natural gas, consumption in kWh is used based on utility bills. In the case of liquid fuels, the volume consumed (litres) is used and converted to energy (kWh) by applying the average fuel density and lower heating value (LHV), according to standard values.

Non-renewable energy production is based on the consumption of diesel fuel by generators.

Energy consumption





Gross scopes 1, 2 and 3 and total GHG emissions (E1-6)

MasOrange is aware that its activity is not greenhouse-gas-emission-intensive. But it recognises that reducing emissions is key to combating climate change and has therefore defined CO₂ emission cutting as a focal point of its environmental strategy. Scopes 1, 2 and 3 GHG²³ emissions are set out below:

GHG emissions (tCO ₂ e) ²⁴	Retrospective			Milestones and target year			Annual target % / base year
	2025	2024 (base year)	% variation	2030	2034	2040	
Scope 1²⁵	5,579	5,814	-4.04%	3,561	2,510	837	-4.04%
Location-based Scope 2²⁶	20,870	20,825	0.22%	n/a	n/a	n/a	-
Market-based Scope 2	0	0	-	0	0	0	-
Scope 3	696,623	653,025²⁷	6.68%	663,577	496,460	213,928	6.68%
1 Goods and services purchased	482,306	473,848	1.79%				n/a
2 Capital goods	53,001	50,316	5.34%				n/a
3 Activities related to fuel and energy (not included in Scopes 1 or 2)	517	534	-3.26%				n/a
4 Upstream transport and distribution	734	315	133.18%				n/a
5 Waste generated by operations	4	5	-20.00%				n/a
6 Business trips	510	443	15.07%				n/a
7 Employee travel	7,392	- ²⁸	-				n/a
11 Use of products sold	96,777	72,335	33.79%				n/a
12 End-of-life treatment of products sold	4	6	-35.16%				n/a
13 Assets leased downstream	55,378	55,223	0.28%				n/a
Total location-based emissions	723,072	679,664	6.39%	n/a	n/a	n/a	-
Total market-based emissions	702,203	658,839	6.58%	667,138	498,970	214,765	6.58%

Note: The data are estimates pending the publication of the 2025 emission factors by the Ministry for the Ecological Transition. Additionally, the energy consumption data are partially estimated as of the closing date of this Report. These emissions are subject to carbon footprint verification, scheduled for June 2026, in accordance with ISO 14064:2019, to be carried out by AENOR.

²³ Greenhouse gases include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃).

²⁴ MasOrange does not generate biogenic emissions and has no emissions from regulated emission trading schemes.

²⁵ The factors used to calculate Scope 1 and Scope 2 emissions were obtained from the Spanish Climate Change Office.

²⁶ PPAs and certificates of origin are arranged for power consumption.

²⁷ The Scope 3 figure for 2024 was adjusted to reflect the update of emission factors and a scope change in Scope 3, category 1.

²⁸ Category 7 emissions were not calculated in 2024.



The following table shows MasOrange's greenhouse gas emission intensity based on net revenue and by customer:

GHG emission intensity based on net revenue (tCO ₂ e / million €) ²⁹	2025	2024	% variation
Location-based GHG emission intensity (total GHG emissions per net revenue)	0.0001	0.0001	-22.08%
Market-based GHG emission intensity (total GHG emissions per net revenue)	0.0001	0.0001	-21.93%

The GHG intensity information based on both location and market is set out below, calculated according to the number of customers. For further details on customers and their distribution, see ESRS 2, section SBM-1.

GHG emission intensity by customer	2025	2024	% variation
Location-based GHG emission intensity (tCO ₂ e) (Scopes 1+2)	0.0006	0.0007	-11.90%
Market-based GHG emission intensity (tCO ₂ e) (Scopes 1+2)	0.0001	0.0001	-14.85%
Location-based GHG emission intensity (tCO ₂ e) (Scopes 1+2+3)	0.0165	0.0174	-5.60%
Market-based GHG emission intensity (tCO ₂ e) (Scopes 1+2+3)	0.0160	0.0169	-5.43%

²⁹ Revenue has been obtained from the 'Consolidated Income Statement' of the Consolidated Annual Accounts.



Calculation method and assumptions

The emissions included in the Report were calculated following an operational control approach, including emissions from facilities over which MasOrange exercises operational control. MasOrange followed the GHG Protocol recommendations.

The method employed by MasOrange to calculate tCO₂e emissions was applied using an internal automated calculation tool, based on the EMEP/EEA methodology³⁰ and in accordance with the ISO 14064 standard. This tool integrates activity data, such as consumption and distances, official and category-specific emission factors, prioritising those that minimise uncertainty, and validated calculation algorithms. The emissions calculation included the life-cycle analysis of fuels (WTT), taking account of losses during transport and distribution of electricity and gas sold.

The emission factors used to calculate Scope 1 and 2 emissions were obtained from the Spanish Ministry for the Ecological Transition and the Demographic Challenge's Climate Change Office.

As regards Scope 3 calculations, it should be noted that the emission factors used vary depending on the nature of each category and the type of data available (economic or physical). For the physical data, internationally recognised sources, frameworks and databases such as ADEME, GLEC, DEFRA and EMEP/EEA are taken into account. Economic data are compiled using the input-output methodology. Total Scope 3 emissions are included in ten of the fifteen categories reflected in the GHG Protocol methodology. The remaining five categories were ruled out after analysing MasOrange's business model.

GHG removals and GHG mitigation projects financed through carbon credits (E1-7)

In line with the precautionary principle, MasOrange has put measures in place to preserve the environment and deploy its network responsibly. MasOrange invests annually in emission mitigation projects that capture CO₂ equivalent to its direct carbon footprint, reflecting the Company's determination to urgently address climate change. In 2025, the Group continued to be involved in the “REDD+ Yuxibu” project, together with the Sylvestris Group and Canopée Gestão Ambiental e Forestal, conserving and recovering an area at extreme risk of deforestation in Sena Maureira (Acre-Brazil).

The total amount of emissions offset thanks to this project is shown below:

³⁰ This methodology is set out in the Air Pollutant Emissions Inventory Guidebook, a set of technical guidelines for estimating and reporting emissions published by the European Environment Agency (EEA), with technical content reviewed by the EMEP working group.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Carbon credits cancelled in the reporting year (tCO ₂ e)	2025	2024	% variation
Total GHG emissions from cancelled carbon credits (tCO₂e)	5,579.25	5,813.92	-4.04%
Proportion of elimination projects (%)	100.00%	100.00%	—%
Proportion of reduction projects (%)	—%	—%	-
Verra-recognised quality standard (%)	100.00%	100.00%	—%
Proportion of projects in the EU (%)	—%	—%	-
Proportion of carbon credits that can be considered corresponding adjustments (%)	n.a.	n.a.	-

MasOrange is currently defining the total amount of carbon credits it plans to cancel in the future.

It also participates in other emission absorption projects registered with the Ministry for the Ecological Transition and the Demographic Challenge:

- One of these projects is **Bosque Orange** (*Orange Forest*), for which the first five-year reports on reforestation efforts undertaken in previous years, together with the Sylvestris Group, in Monte La Umbría in Teruel, were completed and presented in 2025. The monitoring undertaken made it possible to progressively improve adaptation to the environment, so a favourable consolidation is envisaged in the coming years.
- MasOrange has also **reforested land in Asturias** thanks to Pepephone's “**Whoever has a friend has a tree**” campaign, which plants a tree every time a customer's friend signs up with Pepephone. For this initiative, MasOrange collaborates with Bosquia, a company specialising in CO₂ emission offset projects through reforestation in Spain.

Internal carbon pricing system (E1-8)

MasOrange does not currently have an internal carbon pricing mechanism, so the disclosure of information associated with this requirement is not applicable.

Potential financial effects from material physical and transition risks and potential climate-related opportunities (E1-9)

As laid down in ESRS 1 Annex C (list of phased-in reporting requirements), MasOrange avails itself of the exemption from disclosing, in the current financial year, the quantification of the forecast financial effects in monetary terms relating to physical and transition risks, as the Company may omit the information required by this disclosure requirement during the first year of Report preparation. Additionally, MasOrange may disclose only qualitative information during the first three years. Nor will it provide a description of the effects considered or the basic assumptions used to quantify the expected financial effects.



Resource use and circular economy (ESRS E5)

MasOrange remains firmly committed to reducing waste and encouraging recycling in all its operations. This pledge forms part of its Environment and Energy Policy, which promotes continuous improvement in environmental aspects, helping to minimise waste generation and favour the transition to a circular economy.

Key indicators

Strategic pillar	Topics	2025 milestones
Circular economy	Circular design	Eco-designed Wi-Fi 7: 100% recycled plastic, -5% energy, -5% footprint 30% of equipment reconditioned and installed (792,000 devices)
	Logistics	Equipment recovery rate over 96%
	Management system certifications	ISO 14001: Environmental Management Systems EMAS system: European Eco-Management and Audit Scheme

Impact, risk and opportunity management

Description of the processes to identify and assess material impacts, risks and opportunities related to resource use and circular economy (ESRS 2 IRO-1)

As regards the process followed by MasOrange to identify material impacts, risks and opportunities, see the section “Description of the processes to identify and assess material impacts, risks and opportunities (ESRS 2 IRO-1)”, which describes the four phases of the double materiality analysis: understanding, identification, assessment and determination.

The following table describes significant impacts and opportunities³¹, indicating the part of the value chain in which they originate, their effect on the environment or society, and their link to the Company's strategy or business model:

³¹ Bear in mind that no material risks have been identified.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	----------------------------------	--------------------	---------------------------	----------

Topic	Value chain	Brief description and effects of the IROs	Environmental effect	Link to strategy
E-waste management	Downstream phases	Actual short-term negative impact: Electronic devices designed for a linear life cycle increase resource extraction and consumption, generate higher volumes of electronic waste, release toxic substances and contribute to material scarcity.	Contribution to material scarcity and increased waste.	Waste inherent in the Group's activity
Repair, recycling and reuse of equipment and infrastructure	Own operations	Potential short-term opportunity: The implementation of additional eco-design and efficiency measures, such as equipment reuse, rational use of services and better waste management, could entail an opportunity to reduce environmental impacts, optimise costs and improve investor perception.	N/A	Alignment with the sustainability strategy and the circular economy pillar

MasOrange has no impact on vulnerable groups, local communities or human and labour rights, either through its own operations or throughout the value chain, so there was no need to consult those groups. For further information, see the explanation provided in disclosure requirement IRO-2 in the General disclosures section.

Policies related to resource use and circular economy (E5-1)

MasOrange has various policies related to the use of resources and the circular economy, reflecting the Group's pledge to cut material consumption, to reuse and to recycling. To ensure awareness of these policies and encourage access to training and skills development, the Company makes the MasOrange Campus available to all its employees.

ESG Policy

The ESG Policy sets out the fundamental principles and general framework for the responsible management of resource use and the transition to a circular economy. It embeds resource efficiency into MasOrange's business model and promotes sustainable value creation by reducing natural resource consumption, preventing and responsibly managing waste, and recycling and reusing materials. The policy also promotes responsible management of the impacts, risks and opportunities associated with resource use and the circular economy.

Approved by the Board of Directors, the policy is available on the Group's website and applies to all the Group companies.

Environment and Energy Policy

The Environment and Energy Policy lays down the framework for environmental management at MasOrange, in line with the ESG Strategic Plan. It also includes the principles of continuous improvement, energy efficiency, circular economy, biodiversity protection and regulatory compliance. This policy promotes the integration of circularity criteria into the Group's processes, encouraging the recovery and reuse of equipment, the eco-design of products and optimisation of the use of natural resources, in line with sustainability commitments and applicable regulations.



It was approved by the Group's CEO and is available on the corporate website, applying to all the Group companies.

Procurement Policy

The Procurement Policy sets out a comprehensive framework for risk management in the procurement of goods and services, ensuring efficient use of resources and compliance with internal policies. It prioritises suppliers that apply sustainable practices, such as the use of recyclable materials and responsible processes, in line with the principles of the circular economy. Further information can be found in the section "Policies related to value chain workers (S2-1)".

Supplier Code of Conduct

Commitment to the environment is a fundamental pillar all along the Group's supply chain. By accepting the Supplier Code of Conduct, suppliers pledge to minimise the adverse environmental impact of their activities. Where applicable, they must also implement a rigorous procedure for monitoring and controlling waste, including electronic waste. Further information can be found in the section "Policies related to value chain workers (S2-1)".

MasOrange also has a management system certified under **ISO 14001**, promoting responsible resource management and proper waste management throughout the entire operation.

With these policies, MasOrange manages all material impacts and opportunities related to resource use and the circular economy.

Actions and resources related to resource use and circular economy (E5-2)

MasOrange is aware of the key role played by the products it purchases in its value chain and in the ordinary course of business. It therefore has processes in place to ensure the proper management and control of these products. These processes are essential for the responsible management of the Group's operations, spanning all aspects, from supplier selection to end-of-life products.

In 2025, the Company undertook numerous actions to promote positive impacts and take advantage of material opportunities related to the repair, recycling and reuse of equipment and infrastructure, in line with its ESG strategy, as well as to prevent the negative impacts of electronic waste. The scope spans all phases of the value chain (upstream, downstream and own operations) and all the actions are aligned with the Group's corporate policies, as they favour the achievement of strategic objectives.

In line with the pledge to reduce waste and recycle at its facilities, MasOrange regularly runs recycling awareness campaigns targeting employees and customers. Actions include the following:

Circular design

MasOrange is aware of the need to reduce waste from its activities and to contribute to offsetting its carbon footprint. Although it is a service company and does not carry out production processes of its own to make equipment, the Company requires its suppliers to comply with eco-design standards and regulations. In this way, it promotes the use of sustainable and recycled materials in product design with the aim of minimising its environmental impact.



Eco-design of fixed devices

In 2024, MasOrange began to gradually roll out its new Wi-Fi 7 router, which offers faster, smoother browsing and increased energy savings. The device also has a casing made from 100% recycled plastics and features a design based on the Infinity Ecosystem (*Livebox Infinity* and *Infinity HomeBox*).

This new generation of sustainable fixed devices reinforces the commitment to the principles of the circular economy by addressing the proper management of electrical and electronic equipment life cycles through the design of a new generation of sustainable fixed devices. The eco-design of these devices lays the groundwork for MasOrange's sustainable commitment in this area, ensuring that all new designs:

- Improve the previous generation's carbon footprint indicator by at least 5%.
- Reduce energy consumption by at least 5% compared to the previous generation.
- Respond to a responsible supply chain through ethical trade in gold and other rare metals (tantalum, tin, tungsten). The manufacturer must provide auditable evidence of compliance with Section 1502 of the Dodd-Frank Act and Regulation (EU) 2017/821 of the European Parliament, ensuring that purchases of these materials have a positive impact on the environment, workers' health and human rights.

Mobile device recovery

Initiatives for employees

In 2025, MasOrange relaunched the Volunteer Store for Group employees so as to improve turnover of recovered and marketable equipment. The relaunch improved the store with new equipment, enabling the sale of recovered devices that cannot be sold through the Group's usual channels.

MasOrange also promoted campaigns for the recovery of mobile devices, encouraging Group employees to hand in their old mobile phones in exchange for a series of incentives in each case. In 2025, over 4,270 devices were recovered through mobile phone recovery campaigns targeting the Company's employees, the Madrid region and Madrid City Council.

Initiatives for the general public

MasOrange also launched the "We buy your mobile online" campaign. This allows users to upgrade their smartphones by handing in their old, broken or used mobiles and receiving a direct discount on a new phone. The online process is faster and more convenient for consumers.

All Orange brand stores also have a mobile phone recycling bin where citizens can drop off their old mobile phones, thus contributing to the recovery of raw materials and care for the environment.

As a sign of its commitment to the circular economy and responsible waste management, MasOrange strives to recover mobile phones discarded by its customers and feed them back into the production cycle.



Logistics

MasOrange promotes the reuse of equipment returned by customers when they cancel their service (mainly routers, TV equipment and Wi-Fi repeaters), including the reconditioning of equipment by specialised providers.

Item	2025
Reconditioned equipment installed in customers (units)	792,011
Equipment sent to customers (units)	2,609,222
% equipment reconditioned	30%

Such reuse is possible thanks to the refurbishment of fixed devices undertaken in 2025 by the Logistics Department, as one of its main activities. Through reverse logistics and industrialised reconditioning processes, a recovery rate of over 96% was achieved, with over 900,000 units refurbished, thereby avoiding disposal and allowing reuse in new life cycles.

This activity led to an estimated saving of €40 million on purchases of new equipment and contributed directly to MasOrange's environmental objectives.

Networks

In 2025, MasOrange began deploying Open RAN-ready equipment in the network, in a significant step towards a more sustainable, responsible use of resources in the telecommunications industry, 26.6% of the planned equipment having been installed. Its modular, interoperable architecture allows specific elements to be upgraded or replaced without having to replace the entire infrastructure, facilitating reuse and thus reducing the need to manufacture new equipment.

MasOrange also has an industrialised process for managing dismantled materials, allowing the reuse of network equipment. Through this project, the Group promotes the reuse of dismantled equipment in new deployments or maintenance tasks. For equipment that cannot be reused by MasOrange through the OSCAR initiative, external reuse is encouraged through sales to third parties.

Although MasOrange's priority is to reuse materials, recycling is the preferred option when reuse is not possible. These discarded materials are delivered to authorised waste managers as laid down in current legislation.

Finally, MasOrange is currently progressively shutting down HFC nodes, which entails dismantling cables with a high copper content. These cables are sold to a specialised company that recovers the copper for industrial reuse, thus promoting the use of secondary raw materials.

MasOrange has begun deploying “Open RAN-ready” equipment in the network.



Metrics and targets

Targets related to resource use and circular economy (E5-3)

MasOrange has set various targets in connection with the circular economy and effectiveness monitoring. With the current financial year as the base year, these targets are aligned with the aims and objectives of the Group's corporate policies:

Strategic pillar	Topic	Description of the target and aspiration for 2027
Circular economy	Circular design	70% of new devices with built-in eco-design requirements
	Logistics	56% of routers reconditioned

Circular design

Eco-design of fixed devices

MasOrange aims to include eco-design requirements in 70% of the Group's new devices by 2027, integrating aspects such as energy consumption and materials used. Work is currently underway on a new design using chipsets³² that guarantee lower energy consumption.

Mobile device recovery

MasOrange has various programmes, both inside and outside points of sale, focusing on the proper recovery of mobile devices for subsequent recycling and/or reconditioning.

The Group has also set an internal target to bring the sale of reconditioned equipment into its portfolio by 2027, thanks to the refurbishment operation currently in progress.

Logistics

For fixed devices, MasOrange has targeted 56% of routers installed in customers' homes following refurbishment by 2027.

Networks

As regards the deployment of "Open RAN ready" equipment, according to the project timeline the target for 2026 is a continuous increase in the number of devices installed.

By 2028, MasOrange plans to sell 100% of the uninstalled cable from the shutdown of the HFC network nodes.

³² A chipset is the main set of chips in a device, determining its functions, performance and energy consumption.



Resource inflows (E5-4)

As a service company, MasOrange does not have its own production processes for manufacturing equipment, so it does not directly consume raw materials. Most of the resources used come from the purchase of manufactured products, especially electronic equipment. The main resources are:

- Mobile devices.
- Equipment installed in customers' homes, such as routers and decoders.
- Network equipment, such as antennas and other devices linked to the telecommunications infrastructure, including cabling systems.
- Electronic equipment for offices.

So MasOrange will not report information on resource inflows under the ESRS.

Resource outflows (E5-5)

MasOrange deals responsibly with the waste generated in its operations, ensuring that it is treated exclusively by authorised waste managers. Waste forming part of the Company's carbon footprint includes Waste Electrical and Electronic Equipment (WEEE), the generation of which depends on equipment renewal policies and technological obsolescence, factors that can cause variations in the volumes produced each year.

All collection and treatment tasks comply with current regulations and are carried out using the best available technologies, which supports the Group's commitment to sustainable, responsible waste management.

The waste generated by MasOrange is broken down below by type of treatment:



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
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Waste generated (t)	2025	2024	% Variation
Total quantity disposal of which was avoided (t)	251.16	365.99	-31.37%
Total quantity of hazardous waste disposal of which was avoided	4.63	7.62	-39.24%
Preparation for reuse	0.00	0	-
Recycled	4.63	7.62	-39.24%
Other recovery operations	0.00	0	-
Total quantity of non-hazardous waste disposal of which was avoided	246.53	358.37	-31.21%
Preparation for reuse	0.00	0	-
Recycled	246.53	358.37	-31.21%
Other recovery operations	0.00	0	-
Total quantity sent for disposal (t)	0.00	0	-
Total quantity of hazardous waste sent for disposal	0.00	0	-
Incineration	0.00	0	-
Landfill	0.00	0	-
Other disposal operations	0.00	0	-
Total quantity of non-hazardous waste sent for disposal	0.00	0	-
Incineration	0.00	0	-
Landfill	0.00	0	-
Other disposal operations	0.00	0	-
Total quantity of waste generated (t)	251.16	365.99	-31.37%
Non-hazardous waste generated (t)	246.53	358.38	-31.21%
Waste electrical and electronic equipment (WEEE)	101.87	176.79	-42.38%
Cellulose waste from offices, stores and logistics operators	144.66	181.59	-20.33%
Hazardous waste generated (t)	4.63	7.62	-39.20%
Waste electrical and electronic equipment (WEEE)	3.26	5.98	-45.55%
Toner and batteries	1.37	1.64	-15.97%

Non-recycled waste	2025	2024	% variation
Total quantity of non-recycled waste (t)	0	0	-
Total quantity of non-recycled waste (%)	0	0	-



The most significant waste generated by the telecommunications industry is described below, together with the main materials it contains:

- WEEE: includes valuable metals such as gold, silver, platinum and copper, as well as plastics, glass and silicon, among others.
- Packaging: mainly comprises paper and various types of plastics.
- Toner: contains pigments and polymers.
- Batteries: comprises elements such as lithium and cadmium.

Calculation method and assumptions

Waste data is obtained from waste management companies, reflecting the weights and types of waste collected, so no additional calculation methods or assumptions are applied.

Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities (ESRS 2 E5-6)

As laid down in ESRS 1 Annex C (list of phased-in reporting requirements), MasOrange avails itself of the exemption from disclosing, in the current financial year, the quantification of the forecast financial effects in monetary terms relating to resource use and circular economy, as the Company may omit the information required by this disclosure requirement during the first year of Report preparation. Additionally, MasOrange may disclose only qualitative information during the first three years. Nor will it provide a description of the effects considered or the basic assumptions used to quantify the expected financial effects.

Social information





3. Social information

Own workforce (ESRS S1)

Strategy

MasOrange believes that its team is key to developing its business strategy and driving growth. When managing the workforce, the Company seeks to promote employee development and motivation by means of appropriate working conditions and an inclusive, safe, healthy work environment.

MasOrange has a direct impact through its own operations on its own employees, with whom it has a direct relationship (salaried employees). The operations also affect non-salaried workers, i.e. any self-employed workers and personnel from external companies who may perform their activities at Group sites.

The Company therefore strives to create an inclusive, motivating work environment through actions intended to favour its own staff and take advantage of potential opportunities. At the same time, it seeks to prevent risks and mitigate possible negative impacts that may affect both its salaried staff and non-salaried workers who collaborate on specific projects.

Key indicators

Strategic pillar	Topics	2025 milestones
Culture and talent	Employment	8,585 employees 48% women employees 99% indefinite contracts
	Social dialogue	100% employees represented Signed collective bargaining agreement
	Diversity, gender equality and inclusion	32.6% women in leadership positions 26.3% women in technology positions
	Training and talent development	158,708 training hours MasOrange Campus as a unique training and development ecosystem
	Culture	100% employees with 360° feedback 7.1 out of 10 in the cultural integration index survey
	Management system certifications	ISO 45001: Occupational Health and Safety Management Systems ISO 45003: Psychological Risk Management



Interests and views of stakeholders (ESRS 2 SBM-2)

MasOrange greatly values the role played by employees in its activities and recognises that each of its members is key to achieving its objectives.

In 2024, the Group defined its ESG Strategy based on the double materiality process, in which the most relevant matters were identified and prioritised. As mentioned previously, various stakeholders took part in this analysis, including the Group's own personnel, who gave their views on key issues such as working conditions, equality and human rights. The strategy also reflects a commitment to creating a long-term positive impact, building value and effectively managing potential risks.

So the interests, opinions and rights of MasOrange's staff formed the basis of the sustainability strategy.

The employees can access a number of communication channels thanks to which the Group can take their concerns and interests into account. Further details are provided in the section "Processes for engaging with own workers and workers' representatives about impacts (S1-2)" in this chapter.

Material impacts, risks and opportunities and their interaction with strategy and business model(s) (ESRS SBM-3).

As a result of MasOrange's double materiality analysis, various positive material impacts and an opportunity related to the Group's own staff were identified. The following table describes these impacts, indicating the part of the value chain in which they originate, their effect on the environment or society and their link to the Company's strategy or business model:

Topic	Value chain	Brief description of the impact	Effects on people	Link to strategy
Work-life balance	Own operations	Actual short-term positive impacts: - MasOrange has policies that prioritise well-being, such as flexible working hours, teleworking, mental health care, healthy food, physiotherapy, safety training, etc. - It believes in the responsible use of technology and promotes actions to raise awareness and encourage digital disconnection.	Improved well-being, health, productivity, work environment and talent retention.	Strategic focus on well-being, culture and talent retention.
Secure employment	Own operations	Actual short-term positive impact: MasOrange offers job stability; 99% indefinite contracts.	Financial security and talent retention.	Talent development as part of the ESG vision and plan.
Health and safety	Own operations	Actual short-term positive impact: MasOrange is committed to employee health and safety through occupational risk control and prevention systems (ISO 45001, ISO 45003, SIGOS, mandatory training).	Reducing accidents, protecting physical and mental well-being.	Integrating preventive management into Health and Safety.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
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Topic	Value chain	Brief description of the impact	Effects on people	Link to strategy
Diversity, gender equality and inclusion	Own operations	Actual short-term positive impacts: - MasOrange believes in equal treatment and rejects all forms of discrimination. - It promotes equal opportunities, gender equality and equal pay for work of equal value through the Equality Plan and the Diversity Policy and Plan.	Reducing bias, creating inclusive environments, advancing female talent in leadership and technology.	Aligned with the ESG Plan and 2027 targets (35% managers, 30% technology).
Training and skills development	Own operations	Actual short-term positive impact: MasOrange invests in training its employees, promoting their skills, professional development and leadership.	Improving capabilities, employability and internal mobility.	Key to digital transformation and the MasOrange culture.
Corporate culture and employee experience	Own operations	Potential short-term opportunity: MasOrange is striving to build a culture based on cooperation and excellent customer service so as to generate greater value, innovation and productivity.	Enhanced cohesion, motivation, productivity and innovation.	Direct lever of the customer-centric business model and an ESG pillar
Management of the 2024 lay-off proceedings	Own operations	Potential risk, materialised in 2024: Social risk arising from the restructuring process.	Potential negative impact on employees avoided through voluntary measures (82% of departures were voluntary) and improved terms and conditions.	Risk mitigated through social dialogue, negotiation and the new 2025 Collective Bargaining Agreement.

MasOrange is continuously working to have a positive impact on its employees through training programmes, internal campaigns and policies that promote a good work environment, among other initiatives. Details of the actions carried out during the current financial year can be found in the section “Taking action on material impacts, risks and opportunities relating to own workforce (S1-4)”.

At present, the Group's own personnel are not affected by material negative impacts, including the potential effects of transition plans designed to mitigate environmental impacts.

As regards risks and opportunities, the potential risk of MasOrange initiating lay-off proceedings (ERE) materialised in 2024. But it should be noted that the lay-off plan was based mainly on voluntary participation and social dialogue, meaning that the vast majority of departures were voluntary and workers received severance pay in excess of the legal minimum, thereby mitigating the potential negative impact on the workforce. Additionally, in 2025, the negotiation process with employee representatives led to the signing of a new Collective Bargaining Agreement.



Although certain sub-topics of the S1 standard —such as adequate wages, working hours, social dialogue, freedom of association and collective bargaining, inclusion of persons with disabilities, and measures to combat violence and harassment— did not exceed the materiality threshold, they are all equally covered by the Group's regulatory framework and corporate policies. In line with the Code of Ethics, Equality Plans, Harassment Protocols, Occupational Health, Safety and Well-being Policy, and the set of labour measures in force, MasOrange guarantees proper management, supervision and compliance in all the Group companies. So, the fact that a topic is not material for ESRS disclosure purposes does not imply a lack of associated controls, actions or commitments, but rather that it continues to be managed in a structured way through the Group's labour, regulatory compliance and human rights processes.

Certain key social indicators, such as gender diversity in management positions or the culture and impact of training, form part of the set of ESG goals that are embedded in senior managers' variable remuneration, bolstering the alignment between social performance and leadership incentives.

Further information on the relationship between impacts, risks and opportunities and the strategy and business model can be found in the section "Strategy, business model and value chain (SBM-1)" in the General disclosures chapter.

Types of own workers

MasOrange workers (also salaried staff or employees) may benefit in whole or in part from the positive material impacts identified.

They are strategically segmented into three major areas of activity:

- **Offices:** telecommunications activity carried out in work centres located in various regions of Spain, providing national coverage for technical and operational functions.
- **Own stores:** located in different regions of Spain, providing national coverage for direct customer care.
- **Internal service platforms:** engaged primarily in providing technical support and customer care, located in both Spain and Colombia. This approach combines operational efficiency and proximity to the market, facilitating agile management tailored to different geographic contexts.

Among these workers, MasOrange identifies the Networks team working on-site as the own workers who are at greater risk of harm, in view of the type of activities they perform.

Non-salaried staff are self-employed workers and personnel from temporary employment agencies. They are hired to meet specific needs at specific times, so they are not limited to a single area or a concrete phase of the value chain.

The employment relationship established with non-salaried personnel is equivalent to that of workers in the value chain, so they are not considered to be affected by the IROs identified in the double materiality analysis.



Impact, risk and opportunity management

Policies related to own workforce (S1-1)

MasOrange has various policies, an employee code of ethics and other corporate plans and documents that form the basis of its relationship with its own workers. These policies reflect the Group's commitment to respect human and labour rights, as well as equality, professional development and work-life balance. MasOrange has various communication mechanisms in place to gather feedback from employees, as described in the section "Processes for engaging with own workers and workers' representatives about impacts (S1-2)" in this chapter, including the Cultural Integration survey.

To ensure awareness of these policies and encourage access to training and skills development, the MasOrange Campus is available to employees.

The Group's main policies in relation to its own workers are described below:

MasOrange Code of Ethics

The **Code of Ethics** sets out the professional conduct principles and guidelines that guarantee ethical, responsible behaviour by all MasOrange employees, regardless of their business line or level of responsibility. It also addresses the Group's commitments and action principles so as to ensure that actions are consistent with both current legislation and generally accepted ethical principles of social responsibility. The code includes aspects that underpin relations with stakeholders, such as customers, suppliers and shareholders, among others.

It has been approved by the Board of Directors and is available on the Group's website, applying to all the Group companies.

MasOrange's principles of action and conduct set out in this code are in line with fundamental principles and rights, such as the Universal Declaration of Human Rights, and those established by the International Labour Organisation and the OECD, as well as with the commitments made by the MasOrange Group, particularly in relation to ESG, as a United Nations Global Compact member organisation. These pledges include respect for labour rights, such as freedom of association, the right to collective bargaining, eradication of child and forced labour, and promotion of equal opportunities. MasOrange has an Ethics Channel for reporting, monitoring and redressing any negative impacts related to human rights.

Equality Plans

Equality Plans have been signed and implemented in various Group companies, as appropriate and in accordance with the scope of application defined in each case, so as to carry on building a diverse, equal, inclusive, equitable work environment.

They comprise a set of organised, assessed measures seeking to guarantee equal treatment and opportunities for men and women, eradicating any kind of gender-based discrimination. These plans also underscore the belief in professional and remuneration equality, prevention of and action against workplace harassment, sexual harassment and/or gender-based harassment, increased presence of women in positions of responsibility and technical areas, and promotion of a flexible environment that encourages shared responsibility. The plans are available on the corporate intranet and the related responsibility lies with MasOrange's Chief People Officer.



Diversity Policy and Plan

The **Diversity, Equality and Inclusion Policy** reflects MasOrange's commitment to equal opportunities, diversity and inclusion as strategic, cross-cutting principles, as well as its desire to foster diversity and prevent discrimination on the grounds of gender, functional diversity, age, religion, culture, ethnicity, identity and place of origin, among others. It sets out the principles guiding the organisational culture towards a fair, respectful work environment that can have a positive social impact. The Group's goals and pledges to comply with these principles are also defined.

The policy was approved by the Company's CEO, is available on the MasOrange website and applies to all the Group companies.

The Diversity Plan reflects MasOrange's commitment to diversity within and outside the Group. It is intended to guarantee equal opportunities for employees, promote a diverse workforce by identifying talent and removing barriers, and promote diversity beyond MasOrange in association with suppliers and public and private entities. A specific plan for each employee group (offices, own stores and internal platforms) is available on the corporate intranet.

In this way, the Group seeks to become a benchmark in the fight against gender-based discrimination, functional diversity, age, religion, culture, ethnicity, identity and origin, promoting non-discrimination and shared responsibility in family and social obligations to optimise the employees' potential.

The Diversity Plan, for which the Chief People Officer is responsible, establishes the Group's diversity policy goals until 2027. To meet these objectives, a specific action plan is drawn up annually, defining the specific actions to be taken.

MasOrange has adhered to various initiatives and alliances, consolidating its commitment to diversity and inclusion. In 2024, the Company joined the Diversity Charter, a European Commission initiative to promote equality, diversity and inclusion. This commitment has been reinforced by becoming involved with associations such as the Diversity Foundation, REDI (inter-company network for diversity and inclusion of LGBTI employees in Spain) and INTRAMA (network of companies committed to diversity and equality), and strengthened by the Group's CEO participating in the CEO Alliance for Diversity.

Compliance with the General Disability Law (LGD), as well as applying its alternative measures —such as contracting the services of Special Employment Centres, setting up work enclaves or making donations to entities that promote inclusion—, not only responds to a legal obligation for companies with more than 50 employees but also fosters a more fair, inclusive and respectful work environment. These actions enable the integration of persons with disabilities into the labour market, promote diversity, reinforce corporate social responsibility and have a positive impact on both organisational culture and society at large.



Harassment Protocols

The **Harassment Protocols** include measures to prevent, detect and respond to situations of harassment in the workplace, ensuring a safe, respectful work environment free from behaviour that undermines the dignity of MasOrange's employees. They also address aspects such as human and labour rights, equal opportunities and non-discrimination on the grounds of racial and ethnic origin, colour, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national ancestry or social origin, among others. All the Group companies have these protocols in place and they are available on the corporate intranet. MasOrange's Chief People Officer is responsible for the protocols.

Occupational Health, Safety and Well-being Policy

The **Occupational Health, Safety and Well-being Policy** lays down MasOrange's pledge to protect its own workers' fundamental right to health and safety at work. It applies to all Group employees, as well as to employees of companies with which it collaborates. The aim is to guarantee high levels of safety and health at work, addressing workplace diversity and managing psychosocial risks, with an emphasis on protecting particularly vulnerable individuals, and complying with legislation, internal regulations and international standards. This preventive approach adapts to new ways of working, whether in person, remotely or hybrid, to prevent new associated risks.

The policy also promotes consultation of and engagement by employees and their health and safety representatives in the interests of a work environment based on continuous improvement and occupational health, respecting dignity and cooperation. This document has been approved by MasOrange's CEO and is available on the corporate website.

The Joint Prevention Service was also set up in 2024 to guarantee the health and safety of the Group's own workers. MasOrange also has ISO 45001 (Occupational Health and Safety Management Systems) and ISO 45003 (Psychological Risk Management) certifications, besides others awarded by entities such as AENOR.

ESG Policy

The **ESG Policy** integrates social responsibility into the Group's business model and strategy to create sustainable value and manage impacts, risks and opportunities. MasOrange regards its employees as a strategic asset and is committed to respecting human and labour rights, guaranteeing equal opportunities, diversity, equity and non-discrimination, promoting talent development through training and promotion, and ensuring a safe, healthy work environment that fosters well-being and work-life balance, including measures such as flexible working.

This policy applies to all the Group companies, is available on the website and has been approved by MasOrange's Board of Directors, through the Audit and Risk Committee.

MasOrange applies these policies to manage all of its own workforce-related material IROs.



Processes for engaging with own workers and workers' representatives about impacts (S1-2)

MasOrange believes that its team members are the driving force behind the Company and enable it to fulfil its mission. Active communication and engagement with employees is encouraged, either directly or through their representatives, so as to gauge their interests and concerns.

The main channels for collaboration between the Group and its employees, besides direct contact and the corporate intranet, are described below:

- **Interviews during the dialogue with stakeholders.** Regular meetings are held with the employee representatives through specific forums and committees in order to foster social dialogue.
- **Ethics Channel.** This tool allows both internal and external parties to report incidents and concerns. Further details are provided in the section "Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)" in this chapter.
- **Cultural Integration Survey.** This survey is conducted biannually by MasOrange employees to identify challenges and opportunities to boost team cohesion and align the organisational culture with the Group's values.
- **360° Feedback.** 360° Feedback is an annual internal review in which employees receive feedback not only from their managers but also from their colleagues and team members. This allows each person to identify their strengths and improvement areas. In 2025, this evaluation was also applied to the Group's management.
- **Diversity and Equality Mailbox.** This mailbox is available on the corporate intranet, allowing all the Group's employees to submit queries or comments related to diversity and inclusion, the aim being to promote these principles in the workplace and facilitate resolution of any related incidents.
- **Legal forums.** These forums promote employee information, consultation and engagement through their representatives. There is a Works Committee, a Health and Safety Committee, which meets quarterly, and a Training Committee.
- **Meetings (face-to-face and virtual) and work committees.** These meetings are usually held on a monthly basis to address various matters relating to MasOrange employees. In 2025, they were held more frequently to examine a wide variety of topics, as they were part of the collective bargaining agreement negotiations.

Finally, all the above-mentioned collaboration processes are the responsibility of MasOrange's Chief People Office, with the exception of the Ethics Channel, which lies with the Chief Compliance Officer and the Ethics and Compliance Committee.

All the processes mentioned are included in the People Area's general budgets.



Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)

MasOrange has various channels in place to allow employees to express their concerns, so as to remedy any negative impacts on its own workforce.

Any cases related to equality, discrimination or behaviour contrary to the Company's values are handled through two complementary channels: the Equality forums and the Ethics Channel and suggestion mailbox.

Through the Equality Committees, specialised, participatory treatment is offered for matters related to equity, inclusion and non-discrimination, while the Ethics Channel and suggestion box allow Group employees to express their concerns and proposals.

The **Ethics Channel** is an external, confidential, secure tool for reporting breaches of the Group's internal regulations and policies, with retaliation prohibited. It is accessible from the corporate intranet, the Group's website and the websites of the various MasOrange brands, for Board directors, managers, employees and all the Group's collaborators.

The **suggestion box** is designed to receive communications from employees on improvement proposals, ideas, questions and comments related to the Company's internal processes and work environment. MasOrange employees can also make comments verbally or by contacting the Compliance Team directly.

Regardless of the channel used, all alerts are logged in the Ethics Channel tool so that the appropriate investigations are triggered. They are led by the Compliance Department, backed up by the Security Department when necessary.

The Ethics Channel management procedure is part of the Internal Information System Policy and regulates the complaints and queries received. MasOrange's Board has entrusted management of this system to the Chief Compliance Officer, who observes all applicable laws and regulations. In this way, and in coordination with the Ethics and Compliance Committee, whistleblower protection is ensured. All alerts are processed through the appropriate channels and, specifically, in the case of an alert related to a possible situation of discrimination, moral harassment or sexual and/or gender-related harassment, it is transferred to the Labour Relations Department to activate the established mechanisms.

Matters raised through this channel and follow-up actions are managed directly by the Ethics and Compliance Committee, which allows for specialised, agile, close attention to each case. This approach promotes the in-depth analysis of each case, consensus-based decision-making and specific actions, thus ensuring an effective response in line with MasOrange's principles of engagement, transparency and continuous improvement.

The system also precludes discrimination against any whistleblower who honestly reports facts contrary to the law or internal procedures, and guarantees the protection of anonymity and confidentiality, barring legal obligations. Anyone who becomes aware of a situation involving retaliation against a whistleblower must report it to the Chief Compliance Officer. Misuse of the system may lead to disciplinary or legal proceedings.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
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Finally, to ensure that employees and collaborators are familiar with the tools at their disposal and make use of them as a reporting mechanism, annual compliance training is provided, including, among other matters, the Ethics Channel. Regular communiqués are sent as a reminder and as backup information. In this way, the Group ensures awareness of the tool so that employees trust and use it.

Actions related to material impacts, risks and opportunities affecting own workers (S1-4)

In 2025, MasOrange took numerous actions to promote positive impacts and make the most of opportunities related to its own workforce, in line with its strategy, as well as to prevent possible negative impacts and mitigate related risks.

The Group implemented occupational health and safety measures that help prevent accidents and occupational illnesses, improve employee productivity and well-being, and thereby optimise operating costs. All these actions are aligned with the Group's corporate policies, contributing to the achievement of its objectives. Specifically, they were focused on the following aspects:

Well-being

MasOrange launches internal campaigns to continuously foster employee well-being and health, while also promoting the responsible use of technology and encouraging digital disconnection through specific programmes that support a work-life balance.

Policies are implemented that prioritise employee well-being, including aspects such as flexible working hours, teleworking, mental health resources, safety training, healthy food and physiotherapy services. These actions have a positive impact by nurturing a healthy, motivating, productive work environment.

Annual internal wage audits are conducted to promote pay equity in all the Group companies. They are carried out at the same time as salary increases. An internal tool is used to define salary bands (grading) and compare the salaries of equivalent positions to check alignment, the purpose being to use this analysis to correct any possible inequalities. The findings are first shared with Group management, which then shares it with lower-level positions.

Coverage of collective bargaining and social dialogue

Thanks to fluid, constructive social dialogue, a single Collective Bargaining Agreement for several MasOrange companies was signed in 2025 and will come into force on 1 January 2026, backed unanimously by the trade unions. This new agreement reflects progress in work-life balance measures and is a major boost for the unification of employment conditions in the companies within its scope, equal pay and standardised fringe benefits.

The leading role played by the employee representatives at MasOrange as spokespersons for collective needs is worthy of note, as all employees are protected in this way.



Attracting talent

In a context marked by the growing need for technological talent and constant workforce upskilling to keep up with the pace of change in the industry, MasOrange is able to meet the challenge of filling key positions so as not to limit its capacity for innovation. The Group implements specific initiatives to attract the best talent, comprising actions to attract, retain and develop the Group's people.

Talent attraction and selection

MasOrange has a specialised internal team that guarantees diverse, transparent, accessible selection processes. In 2025, strategic plans were promoted to bring in technological profiles (software and data engineering) and bolster the B2B Business area (sales, marketing, pre-sales and business development), in line with the Strategic Growth Plan.

The onboarding process is designed to facilitate the integration of these new hires and includes buddy support during the first six months, a welcome breakfast with the CEO, an information session with the Human Resources team, participation in the “Come closer” programme, allowing them to learn about different areas and activities of the business (stores, call centres, installation, etc.), and an online training itinerary providing key information about the Group.

Hiring managers have access to a diversity guide outlining the best practices for ensuring impartial, bias-free selection processes and promoting equal opportunities.

Internal vacancy and mobility publication

Vacancies are advertised internally, encouraging mobility and professional development within the organisation. The selection team interviews candidates, provides feedback and prioritises internal candidates.

MasOrange also has a confidential “We Connect Talent” channel through which employees can share their concerns, professional aspirations, experience and knowledge, facilitating a more personalised management of internal talent.

Young talent

MasOrange believes strongly in hiring young professionals and regularly brings in students and recent graduates. University Chairs, focused on research projects linked to innovation and technology, achieve a 100% post-internship hiring rate.

In 2025, MasOrange reinforced its strategy of attracting young talent by collaborating with new employment platforms and developing new communication channels aimed at this audience, promoting their engagement and active participation.

MasOrange has also updated its “Come On” scholarship programme aimed at promoting female talent in STEM disciplines, thereby helping to boost female employability and narrow the gender gap in the recruitment of technological profiles.

**Work-life balance**

Various measures have been implemented to promote well-being and work-life balance:

- **Flexible working hours:** for both start and finish times, and for lunch breaks at the office.
- **Digital disconnection:** awareness-raising initiatives to ensure that employees get adequate rest.
- **Hybrid working model:** possibility of two full days of teleworking per week and a further 12 days throughout the year.
- Other measures, such as intensive working hours in summer and every Friday, medical and physiotherapy services, a shuttle service, healthy food in the Company canteen, sports activities and initiatives, and discounts on training and leisure activities.

Health and safety

MasOrange has various controls in place and included in the Occupational Health and Safety Management System and the Prevention Plan, relating to occupational risk prevention (ORP) for employees.

The Group's workers are required to undergo health and safety training. There is general training for all employees and specific training for the positions that require it.

Risk assessments are also carried out for all posts, giving rise to preventive measures drawn up to deal with any risks. In this way, MasOrange identifies additional risks for specific posts requiring specific Personal Protective Equipment (PPE) (special footwear, harnesses or helmets).

An additional health monitoring procedure is conducted by an external prevention service. This assesses whether a worker is psychophysically fit for the job they perform, taking the necessary measures if an incompatibility is identified.

MasOrange undergoes health and safety audits every three years, the mandatory period being every four years, thus ensuring maximum compliance in this regard.

To carry out all these actions, the necessary resources are allocated and their use is planned and monitored in order to achieve effective, proactive management of safety, health and well-being at work.

Diversity, gender equality and inclusion

Various MasOrange companies send awareness-raising communiqués and engage in specific actions on the main international diversity days, including the following:

- International LGTBI Pride Day.
- International Day for the Elimination of Violence against Women.
- International Day of Persons with Disabilities.
- International Women's Day.



- International Day of Women and Girls in Science.
- International Autism Awareness Day.
- European Diversity Month.

In 2025, various workshops and talks were held around International Women's Day (8M) with the aim of highlighting MasOrange's commitment to equal opportunities. This is related to the corporate goal of 35% women in positions of responsibility in the Group, having reached 32.6% in 2025.

To promote professional development for women, the Employee Resource Group TechDivers@ was launched in 2025, a community of MasOrange employees united by the goal of encouraging female vocations in STEM disciplines, having reached 25.3% in 2025. This community is sponsored by the Chief Technology Officer.

Also in 2025, Impúlsate ("Go For It") was launched, as a space designed to accompany and promote female talent at MasOrange, in which more than 100 employees have already participated.

The Group also took part in the Professional Women Network group mentoring programme, in which 20 MasOrange employees participate annually. It also takes part in programmes to promote the advancement of women in management positions, such as "Promote, Progress" and "Women in Leadership and STEM". MasOrange received Top Diversity Company certification from INTRAMA in 2025.

MasOrange also has an HRBP (Human Resources Business Partner), Culture and Diversity Department within the People Department, which has drawn up and issued the Group's Diversity Policy, aligned with its vision and values. This department is responsible for applying an Annual Diversity Plan containing specific, measurable objectives, overseeing the effective implementation of measures and actions, leading and coordinating the Diversity Committee, and designing awareness-raising, training and communication actions on Diversity, Equity and Inclusion. The Group is also involved with various diversity associations, as indicated in the section "Policies related to own workforce (S1-1)".

Finally, MasOrange ensures the overall well-being of its employees, valuing each worker's experience and dedication, which is reflected in a long-serving workforce strongly committed to the Company.

Disability

MasOrange is sensitive to the integration of persons with disabilities. In this regard, all the Group companies comply with the General Disability Law (LGD), either through direct hiring or through alternative measures, previously approved by the public administration, such as contracting services of Special Employment Centres.

Training and talent development

MasOrange nurtures an environment of self-management and autonomy for acquiring and sharing knowledge, as well as for advancing personal and professional development. Training plans are designed by identifying the team's training needs, aligned with the strategic objectives of the Group and its areas. Needs are prioritised and annual training plans are drawn up and distributed within the Group as a training guide.

**Training**

MasOrange fosters continuous learning aligned with the Group's strategic needs and the professional development of our people. Through Campus +O, our corporate platform, we centralise all training content and facilitate diverse learning experiences that are accessible and adapted to the different business profiles and disciplines.

The training offering is structured around compulsory training courses —essential to ensure safety and compliance in the areas of cybersecurity, data protection, health and safety, compliance, AI passport and appropriate use of technology—, cross-disciplinary training to boost common skills, and specialised training for each discipline, designed to deepen technical, commercial, digital and functional knowledge.

The training ecosystem is complemented by summer, autumn, winter and spring schools, which offer lectures and sessions with experts in different subjects, and a set of schools aimed at specific groups. They include:

- B+B Estilo MasOrange, which consolidates key knowledge of the B2B environment and adds self-awareness and certification.
- Órbita, focused on intrapreneurship and the development of innovative projects that have a positive impact.
- Escuela Superior Técnica (Technical College), a postgraduate course in collaboration with the Madrid Polytechnic University (UPM), providing over 700 hours of training in technology and ICT management.
- School of Marketing and Sales, to boost commercial performance.

MasOrange professionals also have access to leading digital platforms such as Edflex, Coursera, Skillsoft, Codecademy, Pluralsight and Google Cloud Skills Boost. Campus +O has a specific Sustainability, Diversity and Inclusion area with content on gender equality, equal opportunities and digital equality.

The Group also promotes language skills through training programmes and nurtures its internal culture through the MasOrange Trainer Community, which offers resources, support and continuous updating. Quarterly course cycles are organised with expert speakers to refresh knowledge and cultivate learning.

Key initiatives were promoted in 2025, including:

- Training in Cybersecurity, Phishing and Information Security
- Update of Compliance linked to the Code of Ethics and the Compliance Management System
- Positive Future Programme, focused on developing ESG skills throughout the organisation
- Data UP, which promotes a data-driven culture, and Talent in Code, on technological reskilling
- MasOrange Leaders, to strengthen leadership
- AI Transformers, enhancing the role of change agents in the use of artificial intelligence.

New training programmes and resources are added each year, consolidating a dynamic, inclusive development environment aligned with MasOrange's ambition to mobilise capabilities in the interests of positive, innovative, sustainable impacts.



**The Positive
Future training
program develops
ESG competencies
and positive
impact across the
entire
organization.**

**Talent development**

MasOrange is committed to nurturing maximum potential in people by providing the right tools, challenging development and the pursuit of continuous growth through a combination of various initiatives:

- Aligning development actions with the MasOrange strategy, focusing on strategic groups.
- Fostering a mindset of growth and challenging development through the 70-20-10 Model.
- Nurturing a culture of continuous self-development through different experiences, support and learning pathways.

At MasOrange, employee development is continuously measured through a structured process that includes:

- **Management by objectives**, assessing team performance in relation to the Company's overall objectives through Objectives and Key Results (OKRs) and the Quarterly Business Review (QBR) process.
- Feedback 360°, which gathers feedback on the professional's key habits, comparing external evaluations and self-assessments. The resulting report highlights strengths and improvement areas, and encourages self-awareness.
- **Identifying potential**. Professional career type and supporting attributes. A distinction is made between specialised, versatile or balanced careers. This exercise ensures that subsequent development actions are aimed at maximising each individual's potential.
- **Development actions**. Based on the critical nature of the position, the talent review process and talent map positioning, development actions begin with a self-awareness exercise to explore the professional's strengths and improvement areas. They receive personalised feedback and take ownership of their development plan.
- **Contribution model**. Sharing and being transparent about the employee development model, recognising the contribution of all individuals to retain talent. This supports the internal mobility model as a lever for development and formal recognition, ensuring internal equity and external competitiveness in terms of compensation.
- **MOVERS**. Volunteer community engaged in spreading good practices. This initiative has three goals: to give opportunities to employees who are interested in teaching or outreach, to boost productivity, and to improve inter-area alignment and morale.



Corporate volunteering

MasOrange promoted various volunteer activities in 2025 to encourage employee engagement. The following initiatives are particularly noteworthy:

- Food collection.
- Toy collection.
- Solidarity market.
- Helping in soup kitchens.
- Volunteering as digital skill trainers.

The 14th +O Volunteering Awards were also held, recognising outstanding initiatives in the social and environmental fields for their positive impact. The total prize money amounted to €90,000 and was raised largely thanks to contributions from MasOrange employees through various initiatives such as solidarity markets and other social actions.

Metrics and targets

Targets related to managing material impacts, risks and opportunities on own workers (S1-5)

MasOrange has set a number of targets for the management of its material impacts and opportunities affecting its own workforce, as well as monitoring the effectiveness of all the actions implemented. The targets shown below are aligned with the aims and objectives of the Group's corporate policies:

Strategic pillar	Topics	Description of the target and aspiration for 2027
Culture and talent	Coverage of collective bargaining and social dialogue	Implementation of transitional measures under the Collective Bargaining Agreement
	Diversity, gender equality and inclusion	35% women in management positions
		30% women in technology positions
	Training and skills development	Satisfaction with training >8/10
	Culture	Cultural integration index >8

**Well-being**

MasOrange has set itself the target of unifying its remuneration policy by 2028, so that the same policy applies to all the Group's employees. This target has been defined internally by the People area, which in turn negotiated all aspects with the workers' unions. Over 15 companies are affected and would be unified in aspects such as pension plans, holiday entitlement and life and health insurance, among others.

The target was set in 2025, the aim being to begin work to achieve it in 2026.

Coverage of collective bargaining and social dialogue

After signing the single Collective Agreement for several MasOrange companies in 2025, in force as from 1 January 2026, implementation tasks are underway, defining processes and developing support systems. Information sessions are being held for the teams involved and content is being prepared for the corporate intranet, facilitating access for employees. Implementation will be gradual until it is consistently applied by 2028.

Health and safety

MasOrange aims to have over 50% of its employees undergo the required medical examinations in the coming years in the interests of health and safety.

There are also targets for field inspections for workers who, though not based at MasOrange's facilities, are part of its workforce.

Diversity, gender equality and inclusion

MasOrange has two targets for 2027: 35% women in leadership positions across the Group and 30% of technology positions to be held by women.

Training and skills development

The Group consolidated its learning and development model and launched MasOrange Campus as a comprehensive training ecosystem, with 72% of the workforce having completed at least one training course by 2025. It also has its own training effectiveness assessment system targeting an average score of 8/10. Following these achievements, MasOrange is focusing its next objectives on maintaining and boosting employee satisfaction through training, consolidating a learning experience aligned with the Company's strategy.

Corporate volunteering

MasOrange has set itself the target for 2026 of increasing employee engagement with volunteer activities undertaken during the year.



Characteristics of the undertaking's employees (S1-6)

There follow details of the key characteristics of MasOrange's salaried personnel:

Number of employees by gender ³³			2025	2024	% variation
	Men	Women	Total	Total	
Offices and own stores	2,790	1,887	4,677	4,664	0.28%
Spain	2,790	1,887	4,677	4,664	0.28%
Platforms	1,698	2,210	3,908	3,280	19.15%
Spain	764	1,244	2,008	1,901	5.63%
Colombia	934	966	1,900	1,379	37.78%
Total	4,488	4,097	8,585 ³⁴	7,944	8.07%

Note: In 2024, by gender, there were 3,785 female and 4,159 male employees.

Number of employees by country	2025	2024	% variation
Offices and own stores	4,677	4,664	0.3%
Spain	4,677	4,664	0.3%
Platforms	3,908	3,280	19.1%
Spain	2,008	1,901	5.6%
Colombia	1,900	1,379	37.8%
Total no. of employees in Spain	6,685	6,565	1.8%
Total no. of employees in Colombia	1,900	1,379	37.8%

8,585
employees,
of whom
48% are
women

³³ MasOrange does not currently have a system in place to categorise employees based on the requirements of the European Sustainability Reporting Standards. Work will be undertaken in the coming years to develop a system that will allow these categories to be classified appropriately.

³⁴ The 2025 figure for the number of employees is provided in Note 5 to the CAA.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

Number of employees by contract type	2025			2024			% variation
	Men	Women	Total	Men	Women	Total	
Indefinite or temporary contract ³⁵							
Number of indefinite employees	4,443	4,068	8,511	4,110	3,730	7,840	8.56%
Number of temporary employees	45	29	74	49	55	104	-28.85%
Full- or part-time contract							
Number of full-time employees	4,154	3,490	7,644	3,820	3,164	6,984	9.45%
Number of part-time employees	334	607	941	290	566	856	9.93%

There follow additional information on personnel-related matters:

Number of employees by professional category at the year-end	2025%		2024%		Variation
Senior management	240	2.80%	188	2.40%	27.66%
Management positions	532	6.20%	581	7.41%	-8.43%
Supervisors and specialised technicians	2,750	32.03%	2,697	34.40%	1.97%
Specialists and administrative workers	5,063	58.97%	4,374	55.79%	15.75%
Total	8,585	100%	7,840	100%	9.50%



³⁵ MasOrange has no employees hired on a non-guaranteed hours basis in Spain or Colombia.

[Executive summary](#)[General disclosures](#)[Environmental information](#)[Social information](#)[Information on governance](#)[Appendix](#)

Employees with indefinite contracts (annual average)	2025		2024		Variation	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
By gender						
Women	3,284.3	569.0	3,309.5	551.4	-0.76%	3.19%
Men	3,994.3	294.6	4,010.8	290.8	-0.41%	1.31%
By age						
< 30	1,294.0	158.3	1,069.8	145.9	20.96%	8.50%
30 to 50	4,010.2	524.8	4,322.9	550.6	-7.23%	-4.69%
> 50	1,974.4	180.5	1,927.6	145.8	2.43%	23.80%
By professional category						
Senior management	233.9	0	202.8	0.00	15.34%	-
Management positions	543.1	0	639.4	0.00	-15.06%	-
Supervisors and specialised technicians	2,730.3	0	2,903.3	0.00	-5.96%	-
Specialists and administrative workers	3,771.3	863.6	3,574.8	842.2	5.50%	2.54%
Total average full- or part-time contracts	7,278.6	863.6	7,320.3	842.2	-0.01%	0.03%
General total		8,142.20		8,162.5		-0.002%

Employee distribution by gender and age





Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

Employees with temporary contracts (annual average)	2025		2024		Variation	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
By gender						
Women	10.3	44.4	23.4	33.3	-55.98%	33.33%
Men	9.4	41.4	15.9	34.3	-40.88%	20.70%
By age						
< 30	8.5	44.5	14.1	31.8	-39.72%	39.94%
30 to 50	10.2	36.1	24.1	31.7	-57.68%	13.88%
> 50	1.0	5.3	2.0	4.8	-50.00%	10.42%
By professional category						
Senior management	0.0	0.0	0.0	0.0	-	-
Management positions	0.0	0.0	0.0	0.0	-	-
Supervisors and specialised technicians	3.0	0.0	1.3	0.0	130.77%	-
Specialists and administrative workers	16.7	85.8	38.3	67.7	-56.40%	26.74%
Total average full- or part-time contracts	19.7	85.8	39.3	67.7	-49.87%	26.74%

Finally, the following information relates to own worker departures:

Employees who left the Company	2025
No. of employees who left the Company ³⁶	1,348
Employee churn (%) ³⁷	16.31%

³⁶ The figures refer to all the employees who left the Company during the year, including voluntary departures, dismissals, retirements and/or deaths.

³⁷ The churn rate was calculated by dividing the number of leavers by the average number of employees for the year.



Number of lay-offs	2025	2024	% variation
By gender			
Women	127	388	-67.27%
Men	192	285	-32.63%
By age			
< 30	80	87	-8.05%
30 to 50	132	278	-52.52%
> 50	107	308	-65.26%
By professional category			
Senior management	17	17	—%
Management positions	27	71	-61.97%
Supervisors and specialised technicians	69	301	-77.08%
Specialists and administrative workers	206	284	-27.46%
Total	319	673	-52.60%

Methods and assumptions

To calculate data relating to the characteristics of the Group's employees, the methodology provided by the ESRS and Law 11/2018 were used, supplemented with best market practices to ensure consistency and comparability.

Characteristics of non-employee workers in the undertaking's own workforce (S1-7)

MasOrange is improving its internal systems to be able to classify and report full data on non-salaried personnel under the ESRS in future Sustainability Reports.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

Collective bargaining coverage and social dialogue (S1-8)

All the MasOrange Group's employees are covered by a collective bargaining agreement. For the MasOrange labour group, comprising most of the Group companies, the first MasOrange Labour Group Collective Agreement was signed in 2025 and came into force on 1 January 2026, providing coverage and unifying terms and conditions for the companies in question.

2025				2024			
Collective bargaining coverage		Social dialogue		Collective bargaining coverage		Social dialogue	
Coverage ratio	Employees - EEA	Employees - Non-EEA	Representation in the workplace (EEA only)	Coverage ratio	Employees - EEA	Employees - Non-EEA	Representation in the workplace (EEA only)
0-19%				0-19%			
20-39%				20-39%			
40-59%				40-59%			
60-79%				60-79%			
80-100%	Spain	Colombia	Spain	80-100%	Spain	Colombia	Spain

Diversity metrics (S1-9)

There follows information on the gender distribution of MasOrange's senior management, as well as the distribution of employees by age group and professional category:

Senior management gender distribution by number and percentage	2025		2024		% variation
	(No.)	%	(No.)	%	
Women	77	32%	47	25%	63.83%
Men	163	68%	141	75%	15.60%
Total no. of senior managers	240	100%	188	100%	27.66%



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

Distribution of employees by age group	2025	2024	% variation
< 30	1,767	1,359	30.02%
30 to 50	4,671	4,736	-1.37%
> 50	2,147	1,849	16.12%
Total no. of employees	8,585	7,944	8.07%

At MasOrange, we believe diversity to be a strategic driver of innovation and cohesion, which is why we explicitly embed multiple dimensions —gender, generation, culture, nationality and seniority— to build teams that reflect our internal plurality and guarantee a culture based on equity, representation and active inclusion.

Adequate wages (S1-10)

MasOrange confirms that 100% of its employees have an adequate wage, based on the reference indices used by the Company in each of the countries where it operates. In this case, the reference index used is the National Minimum Wage.

Social protection (S1-11)

All MasOrange employees have social protection coverage from the start of their employment relationship. This is guaranteed through public programmes and benefits provided by the Company, which cover loss of income resulting from significant life events, such as illness, unemployment, workplace accidents, acquired disability, parental leave and retirement, in line with current legislation.

Persons with disabilities (S1-12)

MasOrange promotes the inclusion of persons with disabilities in all its areas and activities. Currently, employees with disabilities account for 0.99% of the workforce (1.03% in 2024), of whom 0.55% are men and 0.44% are women. The Company is committed to integrating this group and all the Group companies comply with the General Disability Law (LGD), either through direct hiring or through the application of alternative measures authorised by the public administration, such as collaboration with Special Employment Centres.



Training and skills development metrics (S1-13)

There follows information on training and professional development for MasOrange's employees:

Percentage of employees who participated in performance and professional development assessments	2025		
	Men	Women	Total
Senior management	100%	100%	100%
Management positions	100%	100%	100%
Supervisors and specialised technicians	100%	100%	100%
Specialists and administrative workers	100%	100%	100%
Total	100%	100%	100%

Average no. of training hours per employee by gender and professional category	2025		
	Men	Women	Total
Senior management	18.17	36.80	23.24
Management positions	18.84	24.87	20.93
Supervisors and specialised technicians	19.86	19.98	19.91
Specialists and administrative workers	14.71	15.98	15.40
Total	16.97	17.59	17.27



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

Training hours	2025	2024	% variation
By gender			
Women	77,065	71,609	7.62%
Men	81,643	68,571	19.06%
By professional category			
Senior management	4,531	1,641	176.11%
Management positions	12,033	14,276	-15.71%
Supervisors and specialised technicians	55,008	40,976	34.24%
Specialists and administrative workers	87,136	83,287	4.62%
Total	158,708	140,180	13.22%

The Group's training process is audited annually by Aenor, as required by the ISO 9001 certification.

Methods and assumptions

To calculate the data on training and skills development, the methodology provided by the ESRS was used, supplemented with best market practices to ensure consistency and comparability.



Health and safety metrics (S1-14)

The following tables provide information on coverage of MasOrange's employees by the health and safety management system, as well as associated cases:

Health and safety	2025		
	(No.)	%	Rate
Employees covered by the Company's health and safety management system	—	100%	—
Employee deaths	0	—	—
Deaths of value chain workers based at the Group's facilities	0	—	—
Reportable occupational accidents involving employees ³⁸	49	—	3.30%
Employee work-related health issues	3	—	—
Employee days lost	77,234	—	—

³⁸ Any health issue or accident with sick leave, without sick leave or in transit that may have been recorded by the mutual insurance company.



Set out below is further information on hours of absenteeism, occupational illnesses and the number of occupational accidents, indicating frequency and severity:

Health and safety	2025	2024	Variation
Absenteeism (hours)	584,871.63	523,652.24	11.69% ³⁹
Occupational illnesses by gender	3	0	-
Women	3	0	-
Men	0	0	-
Accidents by gender	33	19	73.68%
Women	17	11	54.55%
Men	16	8	100.00%
Frequency ratio by gender	4.30	2.76	55.80%
Women	2.33	1.7	37.06%
Men	1.97	1.06	85.85%
Severity ratio by gender	0.10	0.07	42.86%
Women	0.08	0.05	60.00%
Men	0.02	0.02	—%

Methods and assumptions

To calculate the data on the health and safety of MasOrange's employees, the methodology provided by the ESRS was used, supplemented with best market practices to ensure consistency and comparability.

³⁹ The variation in hours of absenteeism is due to the increase in hours worked.



Work-life balance metrics (S1-15)

The following tables show work-life balance metrics for MasOrange's employees:

Percentage of employees entitled to take leave for family reasons	2025	2024	% variation
Employees entitled to take leave for family reasons	100%	100%	—%

Percentage of employees who have taken family leave by gender	2025	2024	% variation
Men	2.09%	1.75%	19.43%
Women	1.07%	1.06%	0.94%
Total	3.16%	2.81%	12%

Methods and assumptions

To calculate the work-life balance percentages, the methodology provided by the ESRS was used, supplemented with best market practices to ensure consistency and comparability.



Compensation metrics (pay gap and total compensation) (S1-16)

There follows information on the pay gap⁴⁰, compensation ratio and average compensation at MasOrange, together with the corresponding breakdowns:

Gap for office and own store employees

Gender pay gap and employee category	2025	2024	% variation
Senior management	22.41%	16.38%	36.79%
Management positions	5.68%	4.53%	25.41%
Supervisors and specialised technicians	5.64%	6.19%	-8.91%
Specialists and administrative workers	3.23%	2.82%	14.58%
Total pay gap	14.57%	15.04%	-3.12%

Gap for platform employees

Gender pay gap and employee category	2025	2024	% variation
Senior management	—%		-
Management positions	24.41%	25.38%	-3.82%
Supervisors and specialised technicians	-13.86%	-10.33%	34.18%
Specialists and administrative workers	-6.21%	-2.58%	140.54%
Total pay gap	-6.13%	-2.38%	157.65%

Total annual compensation ratio

The total annual compensation ratio is 20.39, calculated taking into account all the MasOrange Group's global employees. It is the ratio of total annual compensation (fixed remuneration plus target short-term variable remuneration) of the highest-paid person and the median total annual compensation (fixed remuneration plus target variable remuneration) of all employees, using annualised full-time remuneration and excluding the highest-paid person.

In view of the diversity of activities and geographies, the Company also monitors this same ratio for the office and store workforce (excluding platform personnel), resulting in 12.57 for the current financial year.

⁴⁰ The pay gap was calculated using average remuneration data due to the difficulty of compiling average hourly data.



Compensation for MasOrange's employees is set out below:

Compensation for office and own store employees

Average compensation (€)	2025	2024	% variation
By gender			
Women	€55,359.86	€55,639.85	3.21%
Men	€64,803.27	€63,137.51	2.64%
By age			
< 30	€37,557.29	€34,634.57	8.44%
30 to 50	€56,893.18	€54,467.23	4.45%
> 50	€70,947.32	€69,352.30	2.30%
By professional category			
Senior management	€163,192.06	€164,073.34	-0.54%
Management positions	€83,112.13	€84,148.44	-1.23%
Supervisors and specialised technicians	€57,818.21	€56,769.43	1.85%
Specialists and administrative workers	€40,542.46	€39,274.08	3.23%
Total	€60,993.20	€59,261.45	2.92%

Average senior manager compensation (€)	2025	2024	% variation
Female managers	€136,435.37	€143,084.67	-4.65%
Male managers	€175,831.73	€171,119.54	2.75%

MasOrange's Board directors do not receive any remuneration or per diems for holding office. The Chief Executive Officer is a member of MasOrange's Board of Directors and does not receive remuneration for holding office but as a Group executive.

**Compensation for platform employees**

Average compensation (€)	2025	2024	% variation
By gender			
Women	€12,907.25	€12,976.04	-0.53%
Men	€12,161.51	€12,674.62	-4.05%
By age			
< 30	€8,730.11	€8,846.27	-1.31%
30 to 50	€14,444.45	€14,508.58	-0.44%
> 50	€17,627.90	€17,161.43	2.72%
By professional category			
Management positions	€80,803.88	€77,762.51	3.91%
Supervisors and specialised technicians	€13,504.33	€14,002.62	-3.56%
Specialists and administrative workers	€12,401.14	€12,635.41	-1.85%
Total	€12,583.23	€12,846.93	-2.05%

Methods and assumptions

To calculate the data relating to compensation paid to the Group's employees, the methodology provided by the ESRS was used, supplemented with best market practices to ensure consistency and comparability.



Incidents, complaints and severe human rights impacts (S1-17)

The following table sets out the necessary information on cases of discrimination and incidents related to human rights:

Incidents, complaints and severe human rights impacts	2025	2024	% variation
Number of complaints submitted through channels for Company employees members to raise concerns related to human and labour rights	2	5	-60.00%
Number of confirmed cases of discrimination, including harassment, during the period of reference	0	1	-100.00%
Number of human rights violations (excluding cases of discrimination)	0	0	-
Amount of fines, penalties and damages resulting from the cases and claims indicated (€)	0	0	-

Methods and assumptions

Data from MasOrange's channels were used to compile and calculate indicators for serious incidents, complaints and impacts related to human rights, applying the methodology provided by the ESRS and best market practices to ensure consistency and comparability.

Workers in the value chain (ESRS S2)

Strategy

As a telecommunications company, MasOrange's business operates throughout its value chain, affecting employees beyond its own operations upstream and downstream from its internal activities, via commercial links and the provision of products and services. Within this framework, the Group has implemented various actions to continue fostering a favourable effect on these workers in terms of human and labour rights, as well as putting systems in place to anticipate or reduce any adverse consequences.

Key indicators

Strategic pillar	Topics	2025 milestones
Governance and business ethics	Supply chain risk prevention and management	Received Ecovadis Gold Top 5% Sustainability rating
		100% of the procurement team trained and certified in Corporate Social Responsibility
		95% of suppliers in the value chain are European and 85% are Spanish
	Health and safety	98% of expenditure and 1,731 suppliers assessed for ESG, compliance and financial risks
	Management system certifications	Over 30 audits and more than 10,000 occupational risk prevention actions ISO 45001: Occupational Health and Safety Management Systems ISO 45003: Psychological Risk Management

Interests and views of stakeholders (ESRS 2 SBM-2)

MasOrange recognises that workers in the value chain are a key group of affected stakeholders and is aware of the role its strategy and business model can play in mitigating, generating or exacerbating material impacts on their human and labour rights.

Since 2024, the Group's double materiality analysis has addressed the interests, opinions and rights of these workers, covering issues such as working conditions, equal opportunities and respect for human rights. This analysis has been decisive in informing and guiding the Company's strategy and business model.

As a result, MasOrange developed its **ESG Strategic Plan**, reflecting a firm pledge to build long-term positive impacts, generate value and mitigate risks. This strategy is reviewed and updated annually and is structured around six strategic pillars integrating the double materiality analysis findings and the



main concerns of workers in the value chain. Further details on how MasOrange manages its stakeholder relationships so as to take their views into consideration can be found in the disclosure requirement “Interests and views of stakeholders (SBM-2)” in the General disclosures chapter.

Material impacts, risks and opportunities and their interaction with strategy and business model(s) (ESRS SBM-3).

By means of the double materiality analysis, MasOrange identified a material positive impact relating to value chain workers, as described below:

Topic	Value chain	Brief description and effects of the IROs	Effect on people	Link to strategy
Workers in the value chain	Own operations	Actual short-term positive impact: MasOrange requires suppliers and partners to adhere to the Supplier Code of Conduct, bolstering its commitment to respecting human rights throughout the value chain.	Working conditions and human rights of workers in the value chain.	Partnerships and resilient business model.

The actions leading up to this positive impact are described in detail in the section “Actions related to workers in the value chain (S2-4)”. Further information on how MasOrange manages IROs in relation to its strategy and business model can be found in the section “Strategy, business model and value chain (SBM-1)” in the ESRS 2 General disclosures chapter.

Types of workers in the value chain

The main types of workers in the value chain who may be affected by MasOrange's activity are described below:

- Workers at the Group's facilities who are not part of its workforce.** These are workers who, though not employed by MasOrange, provide services at its facilities through contractors or auxiliary service companies.
- Upstream workers in the value chain:**
 - Suppliers of goods and services (software, hardware, services, manufacturing, assembly, raw material extraction).
 - External network infrastructure providers (equipment supply, network deployment, installation, maintenance and operation).
- Downstream workers in the value chain:**
 - Customers: MasOrange has both B2C (individual) and B2B (business) customers, as well as serving the wholesale market.
 - Reverse logistics and end-of-life product management companies: this group includes workers involved in activities such as recovery, reuse, reconditioning, product resale and waste management.



4. **Workers employed by companies in which MasOrange has a stake:** This relates to workers at PremiumFiber TopCo, Uclés InfraCo, S.L. and Data Center Euskadi, S.L.

Worker assessment and control systems

Workers at the Group's facilities who are not part of its own workforce

MasOrange looks out for the health and safety of workers in the value chain who carry out their activities at its facilities through a comprehensive occupational risk prevention system. Given the variety of functions performed by these workers, the Group has established specific risk assessment systems applying to both its own workforce and all subcontractor personnel.

Thanks to these procedures, risks associated with each post are identified and analysed before implementing the necessary preventive measures. Each worker's aptitude to perform their specific function is assessed, thus ensuring safe, appropriate working conditions for all.

MasOrange also recognises that certain job profiles in its supply chain, particularly those involving people with disabilities, may be more susceptible to negative impacts. The contractors are responsible for directly managing the risks to which these employees are exposed. To tighten coordination of business activities, suppliers sign a statement of responsibility as an additional control measure. In this context, MasOrange applies standard health and safety procedures, which already include risk assessment and the adaptation of workstations to individual requirements.

Workers in the value chain who are not based at the Company's sites

MasOrange has implemented various control mechanisms to ensure respect for labour and human rights throughout its value chain, including:

- Mandatory adherence to the Supplier Code of Ethics and Conduct by 100% of suppliers.
- Training programmes for the procurement team on Corporate Social Responsibility in Procurement.
- The collaboration with EcoVadis led to MasOrange obtaining a "Gold" rating in 2025, placing it among the top 5% of companies worldwide. This collaboration enhances the sustainable procurement process and promotes supplier evaluation in line with CSRD regulations.
- Prioritisation of Spanish or European suppliers.
- Regular supplier evaluations, including criteria related to social and environmental risks, regulatory compliance and financial standing.



Some suppliers in the value chain, such as mobile device manufacturers, operate in Asia and the Pacific (e.g. China and Vietnam), areas identified by the United States Bureau of International Labour Affairs, the ILO and UNICEF (United Nations Children's Fund) as potentially risky due to the existence of child labour and forced labour for the period 2024-2025.

MasOrange is aware of this and takes steps to make sure that these risks do not materialise by requiring EcoVadis supplier certification. This certification is one of the most internationally recognised corporate sustainability assessments, evaluating and rating companies' performance in sustainability and corporate social responsibility. For further information on this certification, see the section "Taking action on material impacts, risks and opportunities on value chain workers, and effectiveness of those actions (S2-4)" in this chapter.

Impact, risk and opportunity management

Policies related to value chain workers (S2-1)

MasOrange believes strongly in respecting human and labour rights, both in its own operations and throughout the entire value chain. To guarantee this pledge, the Group has various policies and codes of conduct that regulate relationships with collaborators and suppliers.

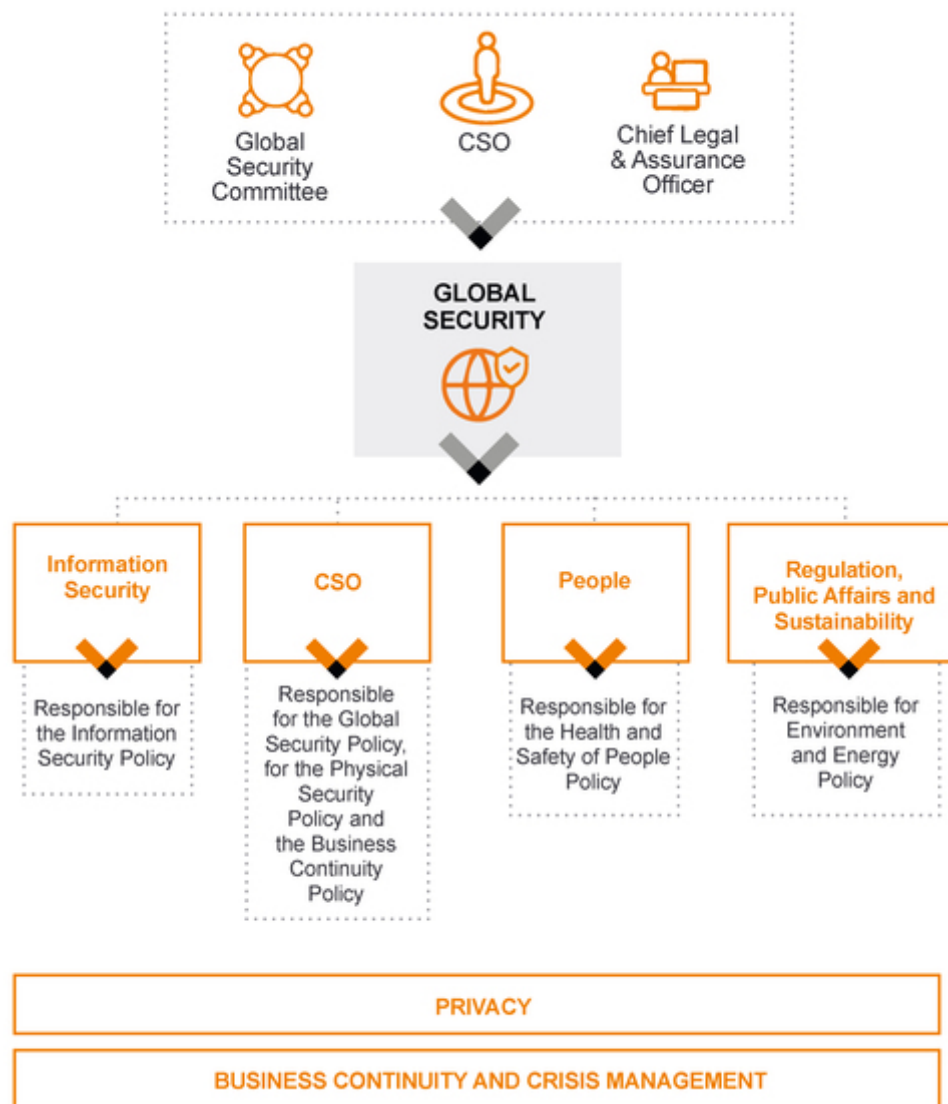
Supplier Code of Conduct

The Code of Conduct has to be signed by all third parties with which MasOrange has commercial relationships. The document, available on the corporate website, sets out the ethical and social responsibility principles required of suppliers, which must also promote the application of these principles in their own supply chains.

The Code has been approved by the Board of Directors and is structured around the following pillars:

- Compliance with current domestic and international law.
- Respect for the fundamental principles of the Universal Declaration of Human Rights, including dignity, privacy, prohibition of slavery and observance of International Labour Organisation (ILO) standards.
- Application of responsible labour practices, such as freedom of association, collective bargaining, prevention of child labour, diversity, inclusion, non-discrimination, prohibition of forced labour, remuneration conditions, control of working hours, and occupational health and safety.
- Commitment to combating climate change and protecting the environment.
- Prohibition of illegal or unethical business practices.
- Compliance with social, environmental and compliance audits and monitoring.
- Access to the Ethics Channel for reporting violations and unethical conduct.

MasOrange actively builds relationships with its suppliers based on trust, integrity and respect to ensure the best possible service for its customers. So suppliers are expected to embed the principles and values set out in the Group's [Code of Ethics](#), which also applies to directors, managers and employees, into their practices. Further information on this code is provided in the section "Policies related to own workforce (S1-1)".



All suppliers working with MasOrange must also sign a compliance clause guaranteeing respect for the Company's values and principles, as well as prohibiting non-compliance with laws, regulations and MasOrange's internal policies. The clause states that the Group has the right to terminate the commercial relationship in the event of an infringement.

Procurement Policy

The Procurement Policy lays down a comprehensive framework for risk management in the procurement of goods and services, ensuring both the efficient use of resources and compliance with other internal policies, such as the Code of Ethics and the Anti-Corruption Policy (for further information, see the section "Corporate culture and business conduct (G1-1)").

This policy promotes transparency throughout the procurement process and ensures adequate risk management in the selection of and relationships with suppliers. It applies to all kinds of purchases made from external suppliers and has been approved by the Group's Board of Directors.

The Procurement Department is responsible under the policy for maintaining an active relationship with suppliers and managing associated risks. In turn, the department requesting a good or service is responsible for overseeing compliance with the contractual terms and conditions and, where applicable, the service level agreements.

Occupational Health, Safety and Well-being Policy

The Occupational Health, Safety and Well-being Policy sets out the Group's pledge to protect the right to health and safety of its workers and external personnel. This policy has been approved by the Company's CEO and is available on the corporate website. It sets high occupational health and safety standards, adapting to different kinds of work and proactively managing the associated risks.

It also encourages employees to actively participate in prevention and continuous improvement measures in the working environment, nurturing an organisational culture based on the principles of dignity, respect and cooperation.

Commitment to Human Rights

MasOrange has a comprehensive evaluation, control and monitoring system that ensures compliance with the United Nations Guiding Principles on Business and Human



Rights, the International Labour Organisation (ILO) Declaration and the OECD Guidelines. It is implemented by means of ESG assessments, regular audits, codes of conduct and accessible, confidential whistleblower channels.

The Group believes strongly in respecting human and labour rights throughout its value chain, both directly and indirectly. In particular, it focuses on preventing rights violations that seriously affect workers, categorically rejecting child labour and forced or compulsory labour, and guaranteeing freedom of association and the right to collective bargaining.

No incidents or serious cases related to human rights were identified in the various phases of the value chain, either upstream nor downstream, in 2025.

MasOrange applies these policies to manage all value chain worker-related material IROs.

Processes for engaging with value chain workers about impacts (S2-2)

The views of stakeholders, including suppliers and workers in the value chain, are taken into account by the Company in areas such as policy development, implementation of measures, communication channels, etc.

Throughout MasOrange's professional relationship with suppliers, the Procurement Department is responsible for maintaining an active relationship and communication with them, as well as for ensuring control of associated risks.

The Group holds business review meetings with suppliers in which communication is two-way. They are held based on the status of specific projects, without a specific frequency. The meetings are attended by both the suppliers and the areas with which they have a commercial relationship. The Procurement Department only participates according to the need and reason for the meeting.

Processes to remediate negative impacts and channels for value chain workers to raise concerns (S2-3)

To promote a culture of integrity, transparency and responsibility, MasOrange has an [Ethics Channel](#) through which all parties related to the Group can express their concerns or report any breaches, irregularities or acts contrary to the law or the internal policies and regulations of the MasOrange companies.

This channel is available to Board directors, managers, employees, value chain partners (such as suppliers and subcontractor personnel), other stakeholders and society in general. Through the channel, it is possible to report, confidentially and, if desired, anonymously, conduct that may constitute:

- Legal infringements (such as corruption, influence peddling, fraud or conflicts of interest).
- Irregularities in relation to ethics, internal control, auditing or accounting.
- Violations of human rights or fundamental freedoms.
- Risks related to health, personal safety or the environment.
- Breaches of the Group's internal policies and procedures.

The Ethics Channel is managed through an external tool that guarantees the confidentiality of reports.

[Executive summary](#)[General disclosures](#)[Environmental information](#)[Social information](#)[Information on governance](#)[Appendix](#)

The Ethics Channel is managed by means of an external tool that guarantees confidentiality and is accessible via the corporate intranet, the MasOrange website, the websites of the Group's various commercial brands and the Supplier Portal in the procurement digital platform. Reports can be submitted using the tool, in writing or verbally. All reports received, regardless of the channel, are recorded in the tool.

Information on the Ethics Channel is permanently posted on the Supplier Portal, together with the general terms of business, which the supplier accepts on the platform. MasOrange suppliers' employees are informed of the existence of this channel both during training activities and through regular communiqués.

Although the Ethics Channel is external, the investigation is carried out internally provided that the complaint falls within MasOrange's area of competence. The work is undertaken by the Compliance Team, assisted by the Security Department. Once the investigation is closed, two reports are prepared: one by the Security Department describing the investigation findings and another by the Compliance Team, which includes recommendations based on the analysis carried out.

If the complainant is an employee of a subcontracted company, MasOrange's Compliance Team contacts the internal manager responsible for the relationship with the supplier to report the alert and request an investigation. Although the Group does not have the capacity to conduct direct investigations into employees of other companies, it requires the supplier to do so and follows up on the case until it is resolved and the alert is closed. MasOrange also requires the supplier to report on the findings and measures taken before the incident can be closed in the Ethics Channel. In 2025, two reports were received from value chain workers. In both cases, MasOrange carried out the relevant investigations, including the necessary reviews and audits of the suppliers; one case was dismissed and the other case is under investigation.

For further details on the channel and the reports received in the current financial year, see the section "Corporate culture and business conduct (G1-1)" in the Business conduct chapter (S1).



Policies related to value chain workers (S2-4)

In line with its strong belief in human rights and respect for workers throughout the value chain, MasOrange implements initiatives designed to generate positive impacts through control mechanisms over the third parties with which it collaborates. These actions include the collaboration with EcoVadis, participation in the Joint Alliance for CSR (JAC) and responsible management of its commercial relationships. The Group also works actively to prevent, mitigate and remedy any negative impact that may arise from its operations.

1. Collaboration with EcoVadis

The link with EcoVadis is intended to promote sustainable procurement and incentivise supplier ESG assessment, in line with the CSRD. MasOrange suppliers that exceed a certain turnover must obtain this certification through the EcoVadis online platform. It includes assessment criteria associated with issues such as child labour, forced labour and human trafficking, diversity, discrimination and harassment, and third-party human rights.

It is one of the most internationally recognised corporate sustainability assessments for both sustainability and corporate social responsibility (CSR), in which undertakings are analysed across four main pillars:

- **Environment:** policies, actions and outcomes related to environmental management (such as the efficient use of resources, emission reduction, waste management, energy consumption, biodiversity protection and climate change).
- **Labour practices and human rights:** respect for labour rights, safe and healthy working conditions, equal opportunities, diversity, training, prevention of child and forced labour, and respect for human rights throughout the supply chain.
- **Ethics:** business integrity, anti-corruption and bribery, transparency, fair competition and data protection.
- **Sustainable procurement:** how the undertaking embeds social and environmental criteria into supplier selection and management, including supply chain risk assessment and demanding responsible standards from business partners.

The EcoVadis methodology is based on international standards such as the Global Reporting Initiative (GRI), the United Nations Global Compact and ISO 26000. Following the assessment, the undertaking receives a score and a detailed report highlighting strengths and improvement areas, facilitating the management and communication of sustainability both internally and externally.

In 2025, a total of 295 suppliers were assessed for social, environmental, compliance and financial risks.

Finally, in the current financial year, MasOrange implemented a supplier scorecard based on the parameters of CDP, Science-Based Targets Initiative (SBTi) and EcoVadis, allowing suppliers to be classified according to their sustainability performance.

2. Alliance with JAC

JAC is an association of telecommunications operators that verifies and develops sustainability in the manufacturing centres of ICT (Information and Communication Technologies) industry suppliers. Its members share resources and best practices in the international supply chain and conduct supplier audits, assessing up to 146 aspects of sustainability, both face-to-face and remotely. MasOrange, through the Orange Group, also undergoes these assessments, ensuring the sustainable performance of its suppliers.



3. Supply chain risk prevention and management procedure

MasOrange has implemented a sustainability risk prevention and management procedure in its supply chain, in addition to price and market analyses.

Before engaging in negotiations, suppliers must register on the MyProc portal, accepting general terms of business addressing social, environmental and commercial responsibility practices. These terms and conditions were updated in 2025 and include unified requirements in terms of social, environmental, commercial, ethical and anti-corruption responsibility and supplier ethics, as well as the explicit prohibition of forced and child labour, as stipulated in the Modern Slavery Law. For suppliers with recurring annual expenditure above certain thresholds, a risk assessment is conducted covering financial, ethical and ESG aspects, including matters such as the environment, labour practices, human rights, ethics and supply chain, corporate ethics, social responsibility, energy and quality. 98% of supplier expenditure was assessed in 2025, as in the previous year.

The Procurement Department carries out the due diligence investigation into compliance and fraud (iDDfix), which, coupled with the due diligences undertaken by the Compliance team, amounts to 1,731 suppliers analysed in 2025.

In 2025, MasOrange continued to monitor the Corporate Social Responsibility risk index implemented in 2023, which associates each procurement category with an indicator, allowing the Group to monitor both the expenditure and the suppliers linked to that indicator.

Finally, 100% of the procurement team members are trained and certified in “Corporate Social Responsibility”, an internal ESG certification that has to be renewed every two years. An ESG risk classification has also been established per procurement category, allowing expenditure to be monitored based on the associated ESG risk level.

4. Occupational Risk Prevention

The Company has a comprehensive occupational health and safety system that applies to the personnel of subcontractors working at MasOrange sites.

Specifically, as regards workers from partner companies, the Group employs a Business Activity Coordination (CAE) system. It consists of the above-mentioned document control and monitoring, entailing the rigorous supervision of workers. MasOrange monitors this process through internal KPIs and meetings with suppliers, among other measures.

For construction work activities, the Company carries out Health and Safety Coordination actions for the workers of its partner companies. This procedure is similar to the CAE, but includes stricter aspects due to the application of Royal Decree 1627/1997, which imposes minimum health and safety provisions on construction sites.

The Company also undergoes frequent internal audits and mandatory external audits every three years, as well as offering specific training based on the type of work. It holds recognised certifications such as ISO 45001, ISO 45003 and others awarded by entities such as AENOR.

In 2025, over 30 audits and more than 10,000 actions were carried out in relation to occupational risk prevention for workers in the MasOrange value chain.

In the current financial year, no notifications were received relating to human rights issues upstream or downstream in the value chain, so MasOrange devoted no resources to manage them. See the section “Policies related to value chain workers (S2-1)” for further information.



Metrics and targets

Targets related to value chain workers (S2-5)

To effectively manage the material impact identified in relation to workers in the value chain and monitor the actions described above, MasOrange has defined specific targets for its partner companies to guide action plans and bolster its commitment to responsible relationship management. These targets were prepared by the Procurement and Occupational Risk Prevention areas, in direct contact with the workers' representatives through the established channels, allowing their progress to be assessed and new opportunities for improvement to be identified. The targets are aligned with and contribute to the corporate policy goals:

Strategic pillar	Topics	Description of the target and aspiration for 2026
Governance and business ethics	Supply chain risk prevention and management	70% of suppliers classed as low-risk thanks to the collaboration with EcoVadis and the alliance with JAC
		95% of expenditure on suppliers assessed for ethical, anti-corruption and sustainability risks
		Top 20 highest-business-volume suppliers audited using the sustainability scorecard (SBTi, EcoVadis and CDP)
		Expenditure on suppliers located in Spain >85%
		0 confirmed serious human rights incidents in the value chain

1. Collaboration with EcoVadis

As regards supplier assessment, MasOrange will continue its efforts to increase supplier engagement with the EcoVadis platform by analysing sustainability criteria. It will also seek to increase the number of suppliers assessed for social, environmental, compliance and financial criteria in the coming years.

2. Alliance with JAC

Along the same lines, Orange S.A. will carry on working with JAC, sharing resources and best practices in the ICT industry so as to further embed sustainability into the industry's supply chain.



3. Supply chain risk prevention and management procedure

In line with the impacts, risks and opportunities identified in the value chain, MasOrange has established specific targets to tighten protection of external workers' labour and human rights, as well as enhancing due diligence in social, ethical and sustainability matters. These targets were defined jointly by the Procurement and Occupational Risk Prevention areas in coordination with the third-party workers' representatives through the established channels, allowing progress to be evaluated and opportunities for improvement to be identified.

The Company has set the following targets for 2026:

- Assessing the ethical, anti-corruption and sustainability risks of 95% of total spending on suppliers, boosting the Group's ability to identify adverse impacts on working conditions in the upstream and downstream phases.
- Ensuring that 70% of supplier spending is classed as low-ESG-risk, based on the independent EcoVadis assessment, prioritising business relationships with third parties that demonstrate responsible labour practices and robust environmental management and business ethics systems.
- Allocating 85% of total spending to suppliers located in Spain, reducing exposure to regions identified as higher-risk for child labour, forced labour or other labour rights violations.
- Assessing the 20 suppliers with the highest turnover using the new sustainability scorecard, which integrates SBTi, EcoVadis and CDP criteria, focusing particularly on the pledge to cut CO₂ emissions and on social and labour outcomes.
- Continuously monitoring the Corporate Social Responsibility risk index implemented in 2023, which allows each procurement category to be linked to specific social and labour risk indicators, facilitating comprehensive oversight of suppliers and associated expenditure.

Taken as a whole, these goals enable MasOrange to set quantifiable, verifiable targets that are directly linked to the material risks identified in its value chain, ensuring continuous improvement of conditions for external workers who may be affected by the Group's activities.



Executive summary

General disclosures

Environmental information

Social information

Information on governance

Appendix

4. Occupational risk prevention

MasOrange seeks to ensure that, by 2026, at least half of its partners' employees undergo a medical examination to determine their suitability for the position they hold, in the interests of worker protection and well-being. To achieve this, the Occupational Risk Prevention management system adheres to ISO 45001, ISO 45003 and the SIGOS (Healthy Organisation Management System) framework, setting specific targets related to on-site reviews and the management of incidents and accidents at contractor companies.



Consumers and end-users (ESRS S4)

Strategy

MasOrange's mission is to provide the keys to a responsible digital world in a context of growing use of technologies. The Company believes that technology should serve people, facilitating their progress towards sustainable development and turning digital innovation into prosperity for all.

To meet the challenges of the future, one of the pillars of the Group's strategic plan means heightening excellence in customer experience. Operational efficiency, our solid networks, our multi-brand strategy, service quality and the latest innovations —such as artificial intelligence and advanced data analytics— are essential aspects to stand out and generate value, drive growth and consolidate trust in our customers.

As a telecommunications operator evolving from TelCo to TechCo, MasOrange directly influences consumers and end-users through the products and services it offers. In this context, the Group has launched various initiatives to expand its positive impact on an increasing number of people. These actions prioritise affordable, accessible services, guaranteeing the highest standards of privacy and cybersecurity, service quality and continuity, and the availability of effective customer care, complaint and redress mechanisms, thereby helping to mitigate any adverse effects.

Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

Key indicators

Strategic pillar	Topics	2025 milestones
Secure connectivity and customer experience	Connectivity and socio-economic development	93% 5G coverage Creation of PremiumFiber, Spain's largest fibre optics company Pioneers in deploying Advanced 5G in 40 Spanish cities Leader in customer satisfaction and numbers (33.4 million fixed and mobile lines, excluding M2M) B2B partner of reference in innovation for both businesses and public administrations
	Customer experience	11% cut in customer strikes ISO 9001: Quality Management System Expanded portfolio of cybersecurity services for businesses
	Cybersecurity	ISO 27001: Information Security Management Systems National Security Scheme (ENS) Certification
	Data privacy	ISO 27701: Information Privacy Management
	Digital equality	96.6% 4G coverage in rural areas 5,768 elderly people trained in digital skills 3,465 young people trained in 5G and AI 6,352 students trained thanks to the "All Connected" programme 3,379 beneficiaries of the "Rural Digital Challenge" programme

Interests and views of stakeholders (ESRS 2 SBM-2)

MasOrange recognises consumers and end-users as key and essential to the development of its business. Through its telecommunications operations and services, it prioritises a secure, accessible, high-quality experience, assuring transparency and effective customer service and complaint mechanisms.

In 2024, the Group defined its ESG Strategy based on the double materiality process, in which the most relevant aspects of ESG policies and actions were identified and prioritised. As mentioned previously, various stakeholders took part in this analysis, including the Group's customers, giving their views on key aspects such as connectivity and socio-economic development, access to information and service quality, affordable products and services, among others. MasOrange's ESG strategy also reflects a pledge to have a long-term positive impact, generating value and effectively managing potential risks.

MasOrange believes that technology should serve people in a responsible digital world. So excellence in customer relations is a strategic pillar underpinned by the Group's operations, networks, innovation, multi-brand strategy and services, building value and trust. MasOrange's mission includes providing the keys to a responsible digital world in which the use of technologies is growing.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

Material impacts, risks and opportunities and their interaction with strategy and business model(s) (ESRS SBM-3).

Through the double materiality analysis mentioned above, MasOrange identified several positive impacts and material opportunities in relation to its consumers and end-users. The following table presents these impacts, explaining where they originate in the value chain, their effect and their link to the strategy or business model:

Topic	Value chain	Brief description	Effect on society	Link to strategy
Connectivity and economic development	Own operations	Short-term positive impact: MasOrange, as a telecommunications company, has fostered access to information, allowing people to access a wide range of information sources and opinions.	Greater access to information in society.	Offering services that stimulate social progress at the individual and business levels
	Downstream phases	Short-term positive impact: In the awareness that connectivity and the efficient use of resources enable social progress, MasOrange promotes communication, teleworking, business development and quality of life throughout the country.	Facilitating economic development and improving quality of life nationwide.	
		Potential short-term opportunity: MasOrange could turn the development of rural telephone infrastructure projects into an opportunity by improving communication conditions in isolated areas.	Improved quality of life and economic development.	Aligned with the digital inclusion pillar of the sustainability strategy
	Entire value chain	Short-term positive impact: Through its coverage and expansion, MasOrange promotes employment and local business development both in its own operations and throughout the value chain.	Promoting employment and economic development.	Offering services that stimulate social progress at the individual and business levels



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

Topic	Value chain	Brief description	Effect on society	Link to strategy
Access to information and quality of service	Downstream phases	Short-term positive impacts: - Through its service portfolio, MasOrange provides B2C customers with access to the global information network, helping them to be better prepared to successfully carry out their daily personal activities. - MasOrange gives customers access to the global information network, offering a service and ensuring optimal customer experience and satisfaction. - Through its service portfolio, MasOrange provides B2B and wholesale customers with access to the global information network, helping them to be better prepared to successfully carry out their work.	Support and facilitation of activities for users and other undertakings.	Alignment with the connectivity and customer experience pillar of the sustainability strategy.
Cybersecurity	Own operations	Short-term positive impact: MasOrange is firmly committed to ensuring the cybersecurity of its business operations and the services it provides to its customers.	Enhanced digital security.	Strategic focus on protecting the activities and services offered by the Group
Data security and privacy	Own operations	Short-term positive impact: MasOrange believes strongly in protecting privacy, this being the aim of the privacy policy protecting both the Group's strategic information and the data of users of its products and services.	Protection of privacy and promotion of digital security.	Alignment with the sustainability strategy, ensuring a positive customer experience and good business ethics.
	Downstream phases	Short-term positive impact: Thanks to a range of technological products and coverage, MasOrange supports businesses and public entities during crisis situations, such as the implementation of a national emergency system.	Support for the development and security of businesses and public entities.	
Non-discrimination	Own operations	Short-term positive impacts: - MasOrange develops accessible, inclusive solutions for all kinds of customers. - It offers training and access to digital skills to Spanish society so as to guarantee equal opportunities for access to the digital world.	Contributing to digital inclusion and equal opportunities.	Strategic focus on developing accessible solutions.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

Topic	Value chain	Brief description	Effect on society	Link to strategy
Child protection	Own operations	Potential short-term opportunity: MasOrange could improve its reputation by offering internet safety education and awareness to minors.	Protecting minors on digital platforms.	Strategic focus on promoting digital education
Affordable products and services	Own operations	Short-term positive impact: MasOrange offers a portfolio of rates and offers tailored to all kinds of customers (social rate, solidarity gigas, subsidised devices, instalment sales, etc.).	Promoting equal access to digital media	Integrating all kinds of customers into the service offering
Innovation and new sustainable services	Own operations	Potential short-term opportunity: By leveraging artificial intelligence, connectivity technologies, smart perimeter and the Internet of Things (IoT), MasOrange strives to optimise resource management and production in various sectors (Smart Mobility, Smart Buildings and E-services), thus increasing revenue by winning customers.	Extending access to information and connectivity to a greater number of customers.	Strategic focus on innovation to add value to our offering.
	Downstream phases	Potential short-term opportunity: Through its investment in and development of 5G to provide high-speed internet connectivity, MasOrange works to facilitate access to advanced technologies for remote communities, including essential services such as telemedicine and remote education, which stimulate development and well-being.	Helping to improve social well-being.	

MasOrange continuously strives to have positive impacts and create value for consumers and end-users through initiatives related to socio-economic development in rural areas, affordable products, accessibility and care for vulnerable groups, encouragement of healthy digital habits and support for innovation and new services, among others. See details of the actions carried out in the current financial year in the section “Actions related to material impacts, risks and opportunities on consumers and end-users (S4-4)”.

All the material opportunities identified derive from the Group's positive material impacts. MasOrange is aware of the importance of energy, the availability of technology providers and consumer confidence to conduct its daily activities and operations and to be able to offer customers quality services, while also taking advantage of relevant opportunities.

For further information on the relationship between impacts, risks and opportunities and the strategy and business model, see the section “Strategy, business model and value chain (SBM-1)” in the General disclosures chapter.



Type of customers

The main categories of MasOrange customers that might be affected by the positive impacts and material opportunities identified are described below:

1. **Private consumers (B2C):** individuals and households that subscribe to mobile, home internet and TV content, among other MasOrange products and services for their daily lives, including offers tailored to different profiles and price levels.
2. **Businesses (B2B):** freelancers, SMEs, large corporations and public administrations. MasOrange provides companies with a comprehensive portfolio of solutions and expert support to help improve their operational efficiency.
3. **Wholesale market:** other operators that use the MasOrange network to provide services to their own customers. The Group provides them with access to infrastructure and collaboration agreements to expand coverage and offerings.

In the awareness that certain consumers or end-users may be exposed to a higher risk of harm, MasOrange has implemented a systematic risk management approach aimed at potentially vulnerable groups such as the elderly and minors. This approach is based on impact assessments, materiality analyses and ongoing stakeholder dialogue. The Company conducts regular human rights and privacy assessments, recognises the technological dependence of users such as people living in rural areas or the elderly, and implements specific measures for accessibility, specialised support, adapted communication and personalised services.

MasOrange has also reviewed its marketing practices to prevent negative impacts on groups with low digital literacy or minors, collaborates with expert entities and continuously monitors the customer experience through surveys, complaint management and proactive follow-up. Risk maps are updated regularly to anticipate and mitigate potential impacts, thereby ensuring a responsible, inclusive offering that is aligned with the Company's ethical standards.

MasOrange has also identified consumer and end-user profiles that may be affected by its products and services. These profiles are integrated into its due diligence processes and strategic design for the following reasons:

- **Consumers exposed to health risks arising from intensive use of technology:** The Company recognises possible indirect effects such as sedentary lifestyles, eye strain or digital stress in general for all its consumers and end-users, and promotes responsible use through awareness campaigns and usage time management features. The Group has identified children and adolescents as being particularly vulnerable to technology, through various lines of work and research carried out with associations and expert entities (such as Save the Children and UNICEF).
- **Users whose fundamental rights may be affected:** Given the scope of MasOrange's digital and connectivity services, and access to customer information, considerations relating to the right to privacy may arise. The Group reinforces protection of privacy, freedom of expression and non-discrimination through regulatory compliance (including the General Data Protection Regulation (GDPR)), impact assessments and data process transparency policies.
- **Consumers that require accurate, accessible information:** This group mainly includes children, rural residents and the elderly. MasOrange provides clear, multilingual documents that are reviewed regularly, as well as support tools which facilitate the understanding and safe use of complex services.



- **Consumers in vulnerable situations:** MasOrange pays specific attention to minors, the elderly, people with disabilities and rural communities, adopting ethical business practices and designing tailored solutions that reduce the digital divide through secure, affordable connectivity and digital skills training.

MasOrange cares deeply about consumer rights and embeds these principles into its business model and the ongoing social impact assessment.

Impact, risk and opportunity management

Policies related to consumers and end-users (S4-1)

In line with its commitment to consumers and end-users, MasOrange has a series of policies, protocols and other corporate documents for managing positive impacts and opportunities related to these groups. The policies reflect the Group's commitment to offering its customers an experience based on transparency, security and quality of service.

The Group's main policies in relation to its consumers and end-users are described below:

ESG Policy

The ESG Policy integrates social responsibility into the Group's business model and strategy, contributing, among other aspects, to the sustainable creation of value for society in general, including its customers. The policy also sets out customer action principles, ensuring that their needs and expectations are understood so as to offer sustainable solutions and increase their satisfaction, observing communication and marketing standards, protecting their health and safety, guaranteeing the privacy and confidentiality of their data, monitoring quality through surveys and customer care, and promoting accessibility and affordability to reduce the digital divide. Further information on this policy can be found in the section "Policies relating to own workforce (S1-1)".

MasOrange Code of Ethics

The Code of Ethics reflects the Group's commitment to its customers in terms of quality, respect and integrity. It also establishes MasOrange's customer action principles, constantly evaluating and improving products and services, the capacity for innovation and processes so as to simplify their experience. In relation to consumers and end-users, it includes, among other principles, respect for human rights, non-discrimination, responsible marketing and ethical customer service. Further information on this document can be found in the section "Policies relating to own workforce (S1-1)".

Privacy and Data Protection Management Policy

The **Privacy and Data Protection Management Policy** sets out the pillars and guidelines to be developed to ensure the proper processing of personal data, guaranteeing compliance with the General Data Protection Regulation (GDPR) and the protection of consumer and end-user privacy in a secure, trustworthy digital environment.

The policy was drawn up following the recommendations of the international standard ISO 27701, approved by MasOrange's Board and posted on the website. It also applies to all professionals related to the Group, whether they belong to the Group itself or to third-party partner companies.



Quality Policy

MasOrange's Quality Policy, applicable to all the Group companies, bolsters its commitment to continuously improving products, services and working methods so as to enhance customer satisfaction. This policy also embeds the principles of customer focus, process simplification and digitalisation, as well as a commitment to investing in communications services for the B2C and B2B segments. It applies to all MasOrange companies and activities, was approved by the Group's CEO and is available on its website.

Additionally, MasOrange has an ISO 9001-certified Quality Management System.

Global Security Policy

The **Global Security Policy** lays down security principles, objectives and governance for all MasOrange operations. It is the Group's frame of reference and promotes good security governance, risk management, personal safety, stakeholder asset and personal data protection, and compliance with applicable laws and regulations, fostering a culture of security aligned with the Company's values and ethical approach.

The policy applies to all the Group companies, was approved by MasOrange's CEO and is available on the Group's website.

Information Security Policy

The **Information Security Policy** is aligned with current legislation on personal data protection, network and information system security, e-commerce, cybersecurity and telecommunications, and with the principles and minimum requirements of the National Security Scheme (ENS). It is designed to ensure the continuity of critical services and protection of personal data so as to increase customer confidence and preserve confidentiality, integrity, availability, authenticity and traceability through controls and a focus on prevention, detection, response and recovery.

The policy was approved by the Board of Directors, which periodically evaluates its effectiveness, and is available on the Company's website. It applies to all the Group companies, covering all their activities, locations and sites.

MasOrange has two information security certifications endorsing the robustness of the controls applied to protect information. They are ISO 27001, an international standard that validates the systematic management of security risks through an Information Security Management System (ISMS); and the high-level ENS certificate, required by the Spanish public administration, guaranteeing that MasOrange complies with enhanced technical measures to ensure the confidentiality, integrity, availability and traceability of data handled in services linked to the public sector.

Digital Rights Charter

The Company demonstrates its commitment to digital inclusion by aligning with the principles of the Digital Rights Charter. This pledge ensures a secure, transparent digital environment that respects users' rights by promoting privacy, freedom of expression, accessibility and equity in the use of information and communication technologies.



Processes for engaging with consumers and end-users about impacts (S4-2)

MasOrange believes that consumers and end-users are the Company's *raison d'être* and the focus of its mission to offer the best experience. So the Group promotes close, continuous communication with customers through telephone, online and face-to-face customer care, social media and surveys in order to respond quickly to their needs and bring their perspectives into strategic and operational decisions, particularly when managing social, ethical and technological impacts.

This collaboration is channelled through direct and indirect participation mechanisms that enable the Company to anticipate risks, adapt its services to social expectations and reinforce its commitment to an ethical, inclusive, people-centred digital transformation. The process is overseen by senior management bodies, including the CEO, as the Board director responsible for ESG, the Audit and Risk Committee and the Ethics and Compliance Committee.

The **channels for collaboration** between the Company and its consumers and end-users are described below:

1. Proactive analysis of customer experience and surveys

MasOrange systematically collects opinions on and evidence of service quality, accessibility, privacy and ethical perception, supported by an integrated experience model that identifies and reduces issues ("strikes"). This approach allows continuous evaluation and improvement aimed at reducing incidents and increasing customer satisfaction. The Customer Experience Department leads this process on an ongoing basis, coordinating the business units and ensuring the consistent implementation of best practices across all the Group's brands.

2. Dialogue with representative associations and forums

The Group regularly dialogues with representative entities and industry forums to review customer service criteria, privacy safeguards and responsible marketing guidelines, ensuring that its policies are in line with social expectations and prevailing regulations. This dialogue is coordinated by the Regulation, Public Affairs and Sustainability Department, supported by the Privacy and Information Security functions and in line with the certified management systems mentioned previously.

3. Open innovation programmes and initiatives

MasOrange participates in open innovation initiatives enabling it to gather feedback from users and customers on new services and use cases, as well as positive-impact entrepreneurship programmes. These actions, which are specific to each project, are aimed at product development and improvement and early validation of solutions. The Corporate Development and Transformation Department coordinates these programmes in collaboration with technical and business areas.



4. Ethics Channel and complaints handling

The organisation has an Ethics Channel open to customers and society at large. It serves as a means of communication for reporting incidents and concerns. The channel is managed by the Chief Compliance Officer and the Ethics and Compliance Committee. For further details, see the section “Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)” in this chapter.

5. Collaboration with NGOs, social entities and vulnerable groups

MasOrange consults and collaborates with organisations and experts to assess the impact of technology on vulnerable groups in the digital environment, such as children, the elderly, rural communities and persons with disabilities. The purpose is to analyse how technology can support these groups and co-design specific solutions that bring their rights, needs and expectations into the design, evaluation and communication of services, while also promoting youth participation. Social and digital impact methodologies are used to guide decision-making on key issues such as parental control, responsible use and digital content.

For further information on these collaborations, see the section “Taking action on material impacts, risks and opportunities on consumers and end-users, and effectiveness of those actions (S4-4)”.

6. Focus groups and usability tests

The Company holds sessions with users and customers (both B2B and B2C) to validate accessibility, understanding of policies and service design, embedded in exercises such as the double materiality analysis and co-design projects. These activities, which are project-specific, are led by the Product, Marketing and Customer Experience units, supported by the ESG Community, and are intended to enhance service usability and security.

All these collaborations enable MasOrange to anticipate risks, adapt services to social expectations and bolster its commitment to an ethical, inclusive, people-centred digital transformation.

7. Collaboration with public administrations

MasOrange keeps up an ongoing dialogue with local and state administrations in order to listen to the needs of the beneficiaries of its services and respond with the highest possible quality.

The Company assesses the effectiveness of collaborations with customers through specific indicators addressed in greater detail in the section “Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)”.



Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

MasOrange has internal and external mechanisms in place to remediate, or contribute to the remediation of, material negative impacts on consumers and end-users. These processes are governed by the principles of due diligence, transparency and corporate responsibility.

Complaint channels

Ethics Channel

MasOrange has an Ethics Channel accessible to employees, customers, suppliers and any third party, allowing them to report, consult or request information about possible internal and external regulatory violations. Through this channel, the Group's consumers and end-users can report negative impacts, rights infringements or practices that conflict with the Code of Ethics and corporate policies, underlining the commitment to ethics and regulatory compliance.

Further details are provided in the section "Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)" in the Own workforce chapter.

Customer care channels

For incidents related to service provision, such as interruptions, billing errors or technical issues, MasOrange has specific customer service channels that are digital (accessible via the website, the WhatsApp app and WhatsApp chat), physical (stores) and telephone-based; the digital channels operate 24 hours a day and are available for each of the brands. The purpose of these channels is to facilitate direct remediation through compensation, service adjustments or technical resolution.

Complaint management begins by gathering all the information to identify the cause prior to triggering the defined resolution operations and procedures (such as processes for managing mass or technical incidents).

If it can be resolved online, procedures are adopted based on the type of incident identified. If appropriate, an adjustment or compensation is applied, according to the policies defined for each case and provided that escalation to a second level is not necessary.

If the complaint cannot be handled online, it is escalated to a second level through the CRM or ticketing tool, where all the information is encoded so that the second level, according to its competences, can process and regularise the situation (applying an adjustment or compensation, if applicable, in line with the policies defined for each case) and inform the customer.

If this second level does not have the means to resolve the issue, it is escalated to a third level and followed up until resolution is confirmed (applying, if applicable, an adjustment or compensation according to the policies defined for each case).

Responsibility for correctly managing complaints received through MasOrange's customer service channels lies with the Customer Operations Department.

**Channel for vulnerable groups**

There are specific channels for vulnerable groups integrated into the general channels detailed above. They offer specialised assistance for elderly people, persons with disabilities and those in vulnerable situations, and can be accessed by means of personalised assistance, accessible guides and adapted support.

The channels are overseen by specific areas of the Company (Compliance, Customer Service, CX Cockpit) and are regularly reviewed to ensure their effectiveness, accessibility and alignment with the principles of fair and proportionate remediation.

Complaints to regulatory bodies

MasOrange consumers and users may submit complaints to regulatory bodies in relation to telecommunications industry legislation. The Group provides the information and documents necessary to activate these external channels when appropriate.

Complaints**Complaint assessment and follow-up**

MasOrange tracks notifications received through its various channels. This monitoring is undertaken by recording each case in the systems to ensure traceability and classification, monitoring key KPIs and regularly reviewing outcomes in internal committees.

MasOrange also verifies the effectiveness of impact remediation through systematic monitoring of complaints and post-service surveys, using indicators of satisfaction, first-contact resolution and percentage of solution v. non-solution. This assessment is backed up by the Ethics Channel analysis, internal and external audits, and reviews by the ESG Committee and the Board, as well as consultation with social entities when appropriate. It is all integrated into a management approach that repairs the causes of reported incidents and prevents recurrences, prioritising first-contact resolution and follow-up to closure.

Finally, MasOrange confirms that its consumers are familiar with and trust its channels in view of the sustained use observed and the findings of post-service surveys. These surveys take representative samples and assess clarity, accessibility and trust, showing high customer satisfaction, particularly with regard to the personalised service. The evidence is endorsed by periodic Customer Experience studies, the Group's favourable position in industry rankings and active listening in forums with consumers and social entities.



Complaints during the year

The Group is audited quarterly in relation to volume, type and service level compliance in complaint resolution. In 2025, a total of 258,851 complaints were received, associated with customer invoice corrections, as laid down in the General Telecommunications Law, thanks to MasOrange's system for measuring and assuring service quality. Complaints relating to other matters were also received.

MasOrange publishes the invoice correction complaint indicator quarterly, subject to an annual audit, so as to fulfil its service quality obligations. The audit verifies compliance with the General Telecommunications Law and ensures that MasOrange has a system in place for measuring and assuring service quality. The audited data is sent to the Secretary of State for Telecommunications and published on the website of the Spanish Ministry for Digital Transformation and the Civil Service under "Monitoring reports" (mineco.gob.es). The quarterly reports reflect a considerable improvement in this indicator:

Service type	Orange	Yoigo	Jazztel	MASMOVIL	Pepephone	Simyo	T	K	R
									2025
Fixed service (%)	0.15	0.08	0.29	0.06	0.08	0.06		0.16	0.18
Mobile service (%)	0.18	0.03	0.27	0.03	0.08	0.06		0.04	0.02
									2024
Fixed service (%)	0.13	0.09	0.28	0.07	0.07	0.07	0	0.1	0.18
Mobile service (%)	0.27	0.03	0.31	0.03	0.07	0.11	0	0.02	0.02

Supplementing the above information, it should be noted that in 2025 there was a drop in the number of civil court oral proceedings initiated. The year-end data are as follows:

Service type	2025	2024
In progress	643	673
Closed	239	208
Additions during the year	107	153

For a more detailed breakdown of the number, type and level of compliance with customer complaints, the Group publishes a quarterly report audited by the Secretary of State:

- **Orange:** <https://www.orange.es/acercadeorange/calidad>



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

- **Yoigo:** https://storage.googleapis.com/yoigo-statics/files/conditions/Calidad_de_Servicio_Yoigo.pdf
- **Jazztel:** <https://www.jazztel.com/accesible/accesible-calidad>
- **MASMOVIL:** <https://www.masmovil.es/static/pdf/calidad-servicio-mm.pdf>
- **Pepephone:** <https://www.pepephone.com/calidad-del-servicio>
- **Euskaltel:** https://www.euskaltel.com/CanalOnline/microsites/calidad_servicio/index.jsp?idioma=esp
- **R:** <https://mundo-r.com/quienes-somos/calidad-de-servicio>
- **Telecable:** <https://web.telecable.es/calidad-servicio>

Actions related to consumers and end-users (S4-4)

MasOrange, a trusted operator with the largest FTTH⁴¹ coverage in Spain and one of the best mobile coverages (4G and 5G), seeks to connect people by putting technology at the service of the best experience. The Group's mission is to humanise technology to facilitate communication, accelerate access to innovative services and offer an easy, simple experience. It aspires to be the operator with the most satisfied customers, respecting people and the planet and working on the accessibility of technology for all.

In an extremely competitive market, the MasOrange Group focuses on its customers by offering a wide, comprehensive range of telecommunications products and services. Its offerings are tailored to the needs of all market segments: from those seeking high-quality products to those who are more price-sensitive, including low-income households that need good connectivity at an affordable cost.

Customer satisfaction and trust are the top strategic priorities for achieving a sustainable competitive advantage over time. MasOrange has a wide range of brands at both the national and regional levels.



For further details, see the disclosure requirement "Strategy, business model and value chain (SBM-1)" in the General disclosures section.

⁴¹ FTTH (Fibre To The Home) is a fibre optic network that reaches homes directly, offering fast, stable internet.



In 2025, the Company undertook numerous actions to build value and positive impacts for its customers and society in general through its products and services, and to make the most of opportunities related to consumers and end-users, in line with the strategy and purpose of creating value for them, as well as to prevent possible negative impacts and mitigate risks. The scope of these actions spans all value chain phases (upstream, downstream and own operations), focusing on the following areas:

Quality product and service offering

Innovation and new services

Connectivity and socio-economic development

Customer satisfaction

Cybersecurity

Affordable, accessible products and services

Responsible advertising and consumption

Data security and privacy

Society

Quality product and service offering

Private customers (B2C)

MasOrange has brands that target the B2C market, offering comprehensive connectivity, entertainment and additional services designed to meet the needs of individual customers:

Orange	- Orange's products and services target the highest segment of the market. - It offers a high-quality fibre network (up to 10 Gbps) and the best 5G and 5G+ connectivity. - Extensive range of devices, entertainment options, premium experience and value-added services (home insurance, energy, health).
Yoigo	- All rates include unlimited minutes and automatic browsing speed reduction when data is consumed. Consumption alerts are received until the data allowance limit is reached. - A significant proportion of customers have switched to unlimited data contracts, which offer greater predictability and transparency without consumption concerns.
Jazztel	- Jazztel offers high-quality telecommunications services (fibre, 5G and Jazztel TV) at a good price. - The offering combines simplicity and quality in connectivity with competitive prices and the best customer service.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

MASMOVIL	control their bills. ▪ The main focus is on helping customers save money by only contracting what they really need, without forcing them to take on other services they have not requested. ▪ If customers wish, they can sign up for other services such as television, alarms and home energy, among others, and are informed of the costs at all times. ▪ Committed to eradicating telephone fraud, it has communications (emails, SMS, push notifications, etc.) informing customers
Pepephone	▪ Strategy centred on loyalty and continuous improvement. Focus on improving rates for existing customers first. ▪ Pioneer in proactive resolution of potential incidents: for example, in case of fibre incidents, it automatically credits mobile gigabytes so that customers can carry on with their digital lives, teleworking or online education.
Euskaltel, R, Telecable	▪ When the data allowance is used up, customers have additional “More Megs” allowances or can choose to reduce their browsing speed. Notifications are received when 50% and 80% of the allowance is consumed. ▪ Roaming rates are reported by SMS when a customer leaves the EU agreement area.
Simyo	▪ Simyo provides mobile phone and internet services, offering flexibility and customisation to create rates that suit customers’ needs. ▪ Affordable prices and a policy that eliminates minimum contract periods, making it easy to change plans or providers without penalties.

Businesses that use MasOrange products and services (B2B)

MasOrange has solutions geared towards the B2B market, offering advanced connectivity and digital services designed to boost business efficiency and competitiveness. Thanks to the experience and portfolio of the Orange and MASMOVIL brands, the Group can offer freelancers, SMEs and large corporations a wide range of communications services, cloud services, security and artificial intelligence solutions, and digitalisation proposals, tailored to the specific needs of each business and sector:

- In order to target the highest market segment, the Company has developed a comprehensive range of B2B products and services. The Company stands out thanks to the quality of its fibre network, which offers speeds of up to 10 Gbps, as well as its excellent 5G and 5G+ connectivity. The brand provides solutions that include M2M connectivity⁴², cloud services, big data and IoT, 5G private networks, AI automation and optimisation, professional

⁴² M2M is automatic communication between devices without human intervention, using the mobile network or the internet.



services and tailored mobility solutions. All of this is supported by specialised sales teams that provide advice and comprehensive assistance to help our customers.

- MasOrange is a leader in the development and implementation of **5G Private Networks**, a solution aimed at companies and public administrations that guarantees a secure mobile connection with high capacity, low latency, and no network congestion. It adapts to each scenario, supports a large number of devices, and allows traffic prioritization (Network Slicing) in critical situations, optimizing business processes and offering, in addition, fast rollout with an agile and simple installation.
- In 2025, a **Femtocell** solution was also launched, small connected antennas that improve coverage in areas where the signal does not reach with quality, such as some indoor spaces in offices, shops, public bodies or rural environments. With this initiative, the Company helps to drive digitalisation, reduce the digital divide and facilitate teleworking and entrepreneurship in areas where connectivity is key.

Once these solutions consolidated, MasOrange has continued to expand its impact on key digitisation and security projects. Two particularly remarkable initiatives stand out:

- Firstly, the deployment of **connected V16 beacons**, emergency signalling devices with GPS and connection to the DGT 3.0⁴³ which, in 2026, will replace traditional emergency triangles in all vehicles.
- Secondly, the launch of the first **5G network dedicated to emergencies in Spain** through the Orange brand. This network was developed for Madrid City Council and was financed with NEXTGEN EU funds managed by the Ministry of Digital Transformation and Public Function. This state-of-the-art private 5G network will enable law enforcement and emergency services to communicate reliably, securely, and effectively, even during critical situations such as forest fires or natural disasters.

Both projects represent significant progress towards the modernisation of public services and the enhancement of public safety.

It should be noted that, while digital transformation has driven factors such as remote working, it has also blurred the traditional security perimeter of organizations and shifted it to any device connected to the network, the so-called endpoints, from laptops and smartphones to desktop equipment. In response to this new scenario, MasOrange's cybersecurity offering is structured around three very clear pillars: anticipating threats, ensuring business continuity, and working in a coordinated manner with partners, companies and public administrations.

Current threats are more organized and frequent, and affect SMEs, large corporations and public bodies alike. Therefore, protection is not only about having the right tools, but also about having robust processes and the necessary human capability to respond quickly to an incident.

In this regard, defensive artificial intelligence-based solutions have been incorporated, enabling the identification of anomalous behavior before it turns into an attack. Likewise, MasOrange closely monitors emerging technologies, such as quantum computing, which in the coming years will require the evolution of protection systems.

- The most notable milestones in 2025 included the launch of a comprehensive, competitive portfolio of **advanced cybersecurity solutions for SMEs**, probably one of the segments most vulnerable to cyberattacks, as they often lack robust defence systems, making them easier prey for cybercriminals

⁴³ DGT 3.0 is the Directorate General for Traffic's digital system. It receives and manages alerts and locations sent by connected devices to enhance traffic and emergency management.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	---------------------------	---------------------------	----------

and compromising financial and personal information, as well as business continuity. This catalogue includes solutions that are easy for SMEs to implement and manage, adapted from those already offered to large companies to protect them in two areas:

- Network Protection: perimeter security solutions that analyse and filter the flow of information entering and leaving a company so as to protect the network from any external threats. These solutions do not require software installation on devices.
- User Protection: users are the main entry point for cyberattacks, whether via email, internet browsing or the device itself. In 2025, more than 80% of all cyberattacks began with phishing emails. The protection of email, PCs, servers, tablets and smartphones provides advanced security that is far superior to that of traditional antivirus software.

Customer experience and satisfaction

MasOrange guarantees an exceptional customer experience, strengthening relationships based on trust.

Customer experience

In 2025, MasOrange launched a commercial strategy unprecedented in Europe. Through a new portfolio under the Orange brand, the Company boosted its leadership by offering over **1,000 new premium products** from the best brands in its stores, at the most competitive prices and with free financing for up to 48 months, including the best insurance coverage and on advantageous, personalised terms for customers. This offering, initially available to Orange brand customers, will be extended in the coming months to customers of the other MasOrange Group brands. The new initiative reflects the Company's commitment to making the best technology more accessible to everyone, heightening digital inclusion.

The Group has also implemented a process to **continuously enhance the Customer Journey**, led by the Customer Operations area, which comprehensively analyses customer processes across all brands and segments. The purpose is to detect friction and resolve it through tactical actions or organisational transformations by addressing the root cause so as to improve the experience and achieve the Company's strategic objectives.

Customer satisfaction

Customer satisfaction is a fundamental priority for MasOrange. To understand and improve user experience, the Company has a **comprehensive system** monitoring satisfaction through brief, non-intrusive surveys conducted at key moments in the customer relationship. This approach allows us to identify opportunities for improvement and tailor our services to user expectations, thereby bolstering MasOrange's commitment to excellence in customer service.



General, episodic and transactional studies are also undertaken for each brand to assess customer satisfaction at a general and specific level based on various aspects and at different points in their interaction with the Group, the aim being to identify improvement areas. They are conducted quarterly, analysing customers of each brand.

According to the 2025 study findings, all of MasOrange's historical brands still lead customer satisfaction in their segment, maintaining the high levels of previous years and even improving on them, in the main brands and in both segments.

Details of satisfaction assessment findings for the Group's historical brands in 2025 are as follows (according to data published by the consulting firm GFK in its Telecommunications Customer Satisfaction Study Report):

Customer Satisfaction Leaders

– Highest NPS

Services	Brand	2025	
		Satisfaction	% NPS improvement
Convergence	Orange	8.3	100%
	Yoigo	8.4	22%
	Jazztel	8.4	4%
	MASMOVIL	8.2	5%
	Pepephone	9.1	0
	Simyo	8.8	61%
Only mobile	Orange	8.5	100%
	Yoigo	8.5	-3%
	Jazztel	-	-
	MASMOVIL	8.7	2%
	Pepephone	9.2	16%
	Simyo	9.1	26%
Regional brands	Euskaltel	7.6	-
	R	8	-
	Telecable	7.6	-
	Guuk	8.7	-

The Group also continuously analyses customer calls using digital tools based on **advanced artificial intelligence**; findings are used to consolidate specific initiatives that drive satisfaction. MasOrange has a Quality Management System certified under ISO 9001, an international standard that defines the requirements for quality management systems, including a focus on processes, continuous improvement, customer satisfaction, leadership and risk management.



■ Complaints

MasOrange has a complaints management process led by Customer Operations and based on **three pillars**: resolving the customer's incident or concern as quickly as possible, identifying the root causes of problems and acting proactively to detect and prevent incidents so as to avoid new complaints.

Responsible advertising and consumption

In line with its values and faithful to the principles set out in its policies, the Group ensures **transparency** in its products and services. It applies this same principle to responsible advertising through a control procedure, **copyadvice**, performed by Autocontrol. In 2025, this entity awarded the annual Corporate Social Responsibility to Certificate to MasOrange for another year.

The filming of advertising spots for Orange, Yoigo and MASMOVIL includes processes to measure the carbon footprint generated during filming and related offset measures. This process is carried out by the consulting firm Creast and has contributed to the reforestation of the Amazon in collaboration with Saving the Amazon.

To evaluate the success of initiatives related to the health and safety aspects of the Group's services and devices, MasOrange measures the outcomes of their use and application through qualitative and quantitative indicators, built specifically on end-user acceptance and assessment levels. This ensures that all equipment and devices sold on the market comply with the relevant current requirements. 100% of fixed access equipment (routers and repeaters) installed in 2025 has been continuously evaluated and verified to ensure observance of the appropriate labelling and documentation procedures, as laid down in European guidelines, thereby ensuring that there are no negative impacts on consumer health and safety.

Initiatives are also underway in relation to the following aspects:

1. **Promoting the responsible use of technology:** The Group uses its social media channels on a daily basis to inform and educate customers and followers about the responsible use of apps and the benefits this brings to customers, while also helping to publicise campaigns launched by the Spanish Data Protection Agency (AEPD). This initiative has been disseminated across MasOrange's main media channels, such as its social media, blogs, stores, websites and internal and external communications targeting customers of the different brands.
2. **Dissemination of advice on the digital world and the use of technologies:** The Group's various brands offer advice on the digital world in different consumable formats through their social media and blogs, so that current and potential customers can learn about the advantages and risks, the purposes being to inform and educate them on the proper, safe use of technology.
3. **Control and Safety in Radio Emissions:** MasOrange continuously monitors the electromagnetic emissions from its activity and complies with permitted exposure levels. Radio measurements are obtained before building stations (certified under applicable legislation) and regular emission campaigns and measurements are carried out using innovative technology to reduce electromagnetic fields. The Reports of the Spanish Scientific Advisory Committee on Radio Frequencies and Health (CCARS)⁴⁴ state the following: "No adverse health effects have been observed from exposure to radio frequencies from mobile phone antennas, radio and TV transmission, or wireless systems (Wi-Fi) used at work, school or home. The exposure

⁴⁴ Consult further details in the following link: <https://ccars.org.es/publicaciones/documentos-elaborados-por-el-ccars>



levels observed in published studies remain hundreds or thousands of times lower than those considered safe by the ICNIRP, WHO, EU and RD 1066/2001”.

Agreement on the Code of Ethics for good practices in telephone marketing: MasOrange applied the telecommunications industry's code of ethics, in force since 2021, heightening transparency and fair competition in telephone sales. Among the measures included, exhaustive control over the actions of distributors and call platforms, particularly those that could use deceptive, fraudulent or unfair means, is worthy of note. The agreement among operators allows increased supervision to prevent the improper collection of consumer data and responses that could be interpreted as forced acceptance of a change of operator. Restrictions were also placed on commercial calls during rest periods and compliance with the obligation not to contact users registered on the Robinson List has been reinforced, thus ensuring respect for the consumer's wishes. There have been no breaches of regulations or voluntary codes relating to marketing communications.

Innovation and new services

Orange stands out for its ongoing commitment to improvement and innovation so as to remain a leading operator in Spain and worldwide. This is why the Group expands its services and products every year in order to satisfy its customers' needs and offer useful, high-quality services that set it apart from competitors.

In 2025, the Company went for new value-added services that help customers in their daily lives and launched the following:

Insurance

In 2025, MasOrange took steps to unify the device insurance operation for all the Group's brands so as to extend the useful life of customers' equipment and reduce the environmental impact. This initiative, undertaken in 2025 and rolled out downstream in the value chain, responds to new customer needs and is aligned with the Group's diversification strategy.

Also in 2025, MasOrange unified its insurance value proposition under a single partner to improve governance, enhance efficiency and tighten process control. This was implemented through an agreement with the global insurer Zurich.

Energy

MasOrange entered into a partnership with Endesa for the marketing of energy and telecommunications in Spain. Both companies estimate that more than 1 million customers could benefit from personalised offers and high-value-added services, enjoying the best commercial proposals for energy and telecommunications.

Security

In 2025, the Group reached an agreement with Securitas Direct, improving its Home Security services by selecting a partner that meets the highest ESG standards, while increasing the sustainability of the offering and aligning it with the diversification strategy.

Retail media

In October 2025, MasOrange launched a “sustainable” advertising service for businesses based on end-customer consent and on responsible segmentation, making communication more relevant, efficient and non-intrusive. The initiative, aligned with the diversification strategy and deployed in the downstream value chain, entailed an investment of €2.5 million for the Group.



Innovation hub offering more advanced digital solutions for all businesses and public administrations

In 2025, MasOrange worked to develop new digital products and solutions to be launched in 2026. A total of 48 different products or solutions have been developed in the areas of Cloud, Business Apps, Cyber, Workplace, AI & Data and IoT⁴⁵, targeting the SME and Large Accounts market so as to offer improvements for business digitalisation.

Innovation

MasOrange promotes an innovation agenda aimed at generating social and environmental value through solutions based on state-of-the-art connectivity and responsible data use. Through this approach, the Company is working on the future implementation of actions to cut emissions, improve quality of life and strengthen its technological leadership:

- **Traffic optimisation and environmental impact reduction:**
 - The CRETA project, promoted by a consortium of several companies (MasOrange, Abertis, Cellnex, Indra, Opus RSE, Vines and Alpha Syltec Ingeniería), makes use of key technologies such as 5G, remote emissions measurement, advanced analytics and AI to control emissions and optimise traffic flow. The system is based on real-time communications, variable pricing according to environmental impact and autonomous emission monitoring.
 - 5G City Brain uses 5G and artificial intelligence to improve traffic and sustainability: with real-time data, it reduces congestion and emissions, allows better planning, and measures outcomes, such as less congestion, greater energy efficiency and lower CO₂ emissions.
- **Secure online multimedia distribution: Datairon** is an ecosystem that allows businesses to share data in a reliable, controlled way so as to enhance efficiency and service quality, measuring key indicators and reviewing regulatory compliance and the impact on user experience.
- **Fraud prevention and scoring: MasRisk** enables secure data sharing to detect fraud and improve scoring⁴⁶, ensuring protection, traceability and compliance with applicable regulations. It also measures data integrity and availability, validation times and detection effectiveness, assessing regulations and user confidence.
- **Sustainable urban mobility: M4M** integrates multi-sector data (IoT, LPR and mobile telephony) into a federated data space, monitoring environmental, connectivity and operational safety KPIs, combined with lessons learned on the replicability and scalability of the model in other European cities.
- **Autonomous and intelligent mobility: Mobilities for EU** deploys mobility solutions for people and goods based on 5G SA, automation and cooperative services (CCAM). It also measures environmental impact, connectivity and safety, and gathers insights to replicate and scale the model in other European cities.

Secure 5G architecture for automated mobility: EEA4CCAM develops advanced electrical and electronic architecture for Connected, Cooperative and Automated Mobility (CCAM), including remote updates via 5G SA and security and cybersecurity guarantees, documenting best practices for replication and international cooperation.

⁴⁵ The Internet of Things is a technology that allows everyday objects to be connected to the internet to send and receive data, enabling them to function more intelligently and automatically (e.g. smart watches, sensors, spotlights, etc.).

⁴⁶ Scoring refers to the risk of fraud for a person or transaction, calculated using various data, to decide whether to approve, review or block.



The Group has an organisational structure, a specialist team and the necessary tools in place for centralised security management.

MasOrange heightens care and safety for people through telecare, helping in homes through secure connections and in industry with automatic fire detection and response. The following projects are noteworthy:

- **Telemedicine and telecare: Mas4Care** uses 5G and edge computing to manage remote healthcare services, assessing network reliability and availability, response times and patient satisfaction, and analysing the social impact on healthcare access and the reduction of regional inequalities.
- **Automatic fire detection and response: 5G Sectorial – Incendios** detects fire risks and acts automatically. KPIs for latency, early detection, alerts and response times are measured, improving prevention in industrial plants and reducing human risks and material losses.
- **Transborder 5G corridor: Transborder 5G** creates a 5G corridor between Spain and France to manage commercial transport, using 5G SA, AI and IoT to optimise mobility and reduce emissions.

To increase digital trust, the Group is creating environments where different players share information securely and transparently, improving service quality and strengthening the fight against fraud in accordance with current regulations. In parallel, it is preparing solutions for more advanced mobility, with better coordinated transport and safer, more efficient vehicles.

These advances will be implemented progressively between 2026 and 2028.

In general, as these projects are undertaken to diversify MasOrange's activity and involve innovative actions for the Group, monitoring includes a weekly review by the Management Committee and a monthly review by the Executive Committee.

Cybersecurity

The current complex geopolitical context, greater risks associated with climate change and natural disasters, and heightened exposure to digital threats are driving an increasing need for security resources to protect the processes and services that MasOrange provides to its customers. To effectively tackle these challenges, the Group has an organisational structure, a specialised team and the necessary tools for centralised security management, applying the principles of MasOrange's Global Security Policy. Corporate security management is carried out by the Global Security Committee, the collegiate body ultimately responsible for security.

In 2025, MasOrange implemented cybersecurity tools and controls to tighten the protection of systems that host personal data and provide services to consumers and end-users. These tools include continuous monitoring, threat detection and prevention, vulnerability management and response to potential impacts, the aim being to ensure the confidentiality, integrity and availability of information, reduce the risk of breaches and comply with applicable data protection regulations.

The Group has also standardised the processes and tools used by its SOC, which is responsible for managing cybersecurity incidents to ensure a consistent, effective service. This integration, which automates and brings in AI, improves the identification, containment, correction and mitigation of incidents that may affect MasOrange customers, optimising detection and response times and coordination between teams.

Data security and privacy

The protection of personal data, i.e. customer privacy, is hugely important for the Group.

In 2025, MasOrange updated the privacy policies of its telecommunications brands to improve the transparency and clarity of consumer and end-user personal data processing. The update was implemented at Yoigo, Masmovil, Euskaltel and Simple, and is in progress at Orange, Jazztel and Simyo. The Spanish Data Protection Agency (AEPD) has reviewed this update and concluded that it complies with GDPR transparency requirements.

The Group also obtained **ISO 27701 certification** for Xfera, Euskaltel, R, Telecable, Orange and MasOrange itself. This milestone, achieved in 2025 after a year-long process, certifies that the Company's privacy management system meets the highest international standards. As a result of the certification audits, an action plan was defined to resolve the observations detected and reinforce continuous improvement. Also in 2025, Orange achieved ENS high-level recertification, which remains in force for Xfera, Euskaltel, R and Telecable.

MasOrange set up a Privacy Committee to bolster the governance system, which held its first meeting in 2025.

The Company also updated its **Data Protection Impact Assessment** for Telco services so as to identify, mitigate and manage the risks associated with personal data processing, ensuring regulatory compliance and information security.

Connectivity and socio-economic development

Thanks to **plans to roll out next-generation networks**, MasOrange continues to contribute to technological leadership in connectivity and digitalisation so that all Spaniards have access to the Internet wherever they live. The following actions were carried out in 2025:

- **Deployment of 5G and FTTH (fibre-to-the-home) networks⁴⁷:** MasOrange invested close to €500 million in this initiative, reaching **93% of Spain's population**, including over 3,000 rural municipalities. This improved connection speeds by up to 40% and guaranteed access to advanced digital services in traditionally excluded areas, helping to narrow the digital divide.
 - **Extension of state-of-the-art 5G to rural areas** through **UNICO Móvil⁴⁸**: With support from EU Recovery, Transformation and Resilience Plan funds, a total of 2,440 nodes were deployed in 2025 to reach 2,832 nodes in 1,444 municipalities with fewer than 10,000 inhabitants by 2026. This helped improve connectivity and enable advanced services by bringing data processing closer and creating “tailor-made networks” to digitise sectors such as agriculture and logistics.
 - **FTTH network expansion:** MasOrange has FTTH Network coverage of nearly 100% of the territory through its own deployment or agreements with third parties. Specifically, in rural areas, MasOrange's direct investment effort has been achieved thanks to the PEBA and UNICO plans.
- **Faster, more stable fibre optic deployment: XGSPON** offers greater speed and capacity, and reduces response time, making better use of the network. In 2025, MasOrange managed to reach 5.3 million homes that can be connected to this technology.
- **Expansion of the 5G network:** In 2025, MasOrange achieved **93% 5G population coverage**, offering faster, more stable connections.

⁴⁷ FTTH is an access technology that brings fibre optics directly to the home to offer high-speed, low-latency internet.

⁴⁸ UNICO-5G Active Networks Programme, funded by the European Union's Recovery Fund – NextGenerationEU within the framework of the Spanish Ministry for Digital Transformation and the Civil Service's Recovery, Transformation and Resilience Plan.



- **Creation of PremiumFiber** as the largest fibre optic company in Spain: Under a strategic agreement between MasOrange (58%), Vodafone Spain (17%) and the Singapore sovereign fund GIC (25%), this company was set up to consolidate and manage one of the most extensive, advanced FTTH fibre networks in the country, reaching approximately 12 million properties and serving some 5 million customers. PremiumFiber offers a high-quality FTTH network for homes and businesses using state-of-the-art technologies and enhanced efficiency in shared networks, while its energy-efficient design and FTTH help reduce the environmental impact.
- **Network management after the national blackout:** MasOrange immediately triggered contingency protocols and mobilised emergency teams to restore network operability, both voice and internet. Response plans were deployed, technical teams were coordinated and priority was given to the progressive restoration of service, managing to recover more than 90% of mobile and fibre services in a short period of time. Work continued until full restoration, while MasOrange apologised to its customers and thanked them for their patience. The rapid recovery was made possible by the phased restoration of electricity, the use of backup power systems (generators and batteries) and the activation of crisis committees and predefined protocols.

Affordable, accessible products and services

In 2025, MasOrange continued to offer rates and services that make connectivity and devices accessible to all consumers, providing special protection for minors while also supporting the elderly and vulnerable families. The following actions were taken:

- **Affordable comprehensive connectivity:** The **Orange Social Rate** is a convergent fibre and mobile data offering targeting families in situations of economic vulnerability and positioning MasOrange as the industry's leading operator with a comprehensive solution for this group, which helps narrow the digital divide.
- **Digital assistance for the elderly: Mayores Cuidados** is a support solution for the elderly based on a simple smartwatch with automatic fall detection and an SOS button that connects to a specialised 24/7 assistance centre. The device allows users to make and receive calls and, through an app, family members can check their location and activity (steps) and set reminders that are displayed on the watch. This initiative promotes independence, prolongs life at home and an active lifestyle, guarantees assistance in emergencies and gives families peace of mind.
- **Cyber protection service: Orange Cyberprotection** is a no-cost service to customers applying the brand's convergent rates. It blocks fraudulent websites on mobile and Wi-Fi networks and includes antivirus protection; 410,000 licences were reached in 2025.
- **Affordable internet for low-income households:** Euskaltel, R and Telecable launched **Internet Compromiso**, an initiative that offers low-income families a quality service at a reduced price by means of a social rate, helping to bridge the digital divide.
- **No-installation, on-demand internet: 5G at Home**, an Orange initiative, offers no-installation internet access via mobile networks, including mobility and an on/off function so you pay only when you use it. It targets households without fibre coverage or that do not want an installation, and for sporadic connectivity needs.
- **Enhanced mobile coverage indoors and in rural areas: Orange Maximum Coverage** is a service designed to improve signal strength in homes and businesses with insufficient coverage using **femtocells**⁴⁹ and thus facilitating connectivity and digital inclusion, especially in rural Spain. The initiative entered the testing phase in 2025 and the official launch is planned for 2026.

99%
population
coverage and
96.6%
rural coverage

⁴⁹ A femtocell is a mini indoor mobile antenna that, when connected to your internet, improves 4G/5G coverage at home or in the office for a few nearby mobile phones.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
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- **Affordable access to devices:** MasOrange offers a **varied range of devices** at very affordable prices thanks to subsidies on the manufacturer's price and instalment sales, facilitating access to terminals and connection for customers who need it most. 100% of devices are sold in instalments and customers can choose to buy refurbished equipment, maintaining quality at a lower price.

Society

Digital skills

In line with its pledge to develop and enhance digital skills in society, in 2025 MasOrange undertook the following initiatives with the aim of facilitating digital access for those who need it:

- Digital training **“Todo por Aprender” (“Everything to Learn”)**: In 2025, MasOrange continued to strengthen digital skills and bridge the digital divide with its Todo por Aprender project, subsidised by European Next-Generation funds. Together with the Orange Foundation, approximately €10 million was mobilised to train 50,000 people throughout Spain in 2025 and 2026, promoting technological inclusion and citizen empowerment.
- Free digital training for people over 60: **Mayores Conectados (Connected Seniors)** is a face-to-face programme managed by MasOrange to improve digital skills. Active from February 2025 to June 2026, the programme has reached 5,768 beneficiaries, with more than 800 courses completed throughout the country.
- 5G and AI upskilling for unemployed young people in Madrid: **5G-AI Training Pathways** is a programme managed by the Group to train Madrid residents, particularly jobless people under the age of 35, in 5G and artificial intelligence technologies, so as to improve their employability. The programme will run until May 2026 and 3,465 training actions were completed in 2025.
- **Training in digital skills applicable to everyday life: Todos Conectados (Everyone Connected)** brings digital training to the whole of Spain through face-to-face courses in basic digital subjects such as smartphone use and digital identity, among others. The programme is managed by the Orange Foundation and reached 6,325 beneficiaries in 2025.
- **Digital upskilling in rural areas: Reto Rural Digital (Digital Rural Challenge)** is an Orange Foundation project providing free training in digital skills, designed especially for the elderly, women, young people and the unemployed. Courses are taught in person in towns with fewer than 5,000 inhabitants. This programme has reached 3,379 beneficiaries and will run to March 2026.
- **Improving digital accessibility in the Group's channels:** MasOrange has applied **accessibility regulations in its digital environments** (commercial website, private customer area and app) through audits, consultancies and certifications to ensure access for people with disabilities and those facing cognitive barriers (such as the elderly). In this way, MasOrange seeks to contribute to the adaptation of websites and apps to accessibility criteria, facilitating their use by specific groups and, in general, by all citizens.
- **Accessibility in communications and point-of-sale materials:** MasOrange has applied **accessibility regulations to its customer communications**, point-of-sale materials and platform content through audits and consultancies, adapting them to legal criteria. The aim is to guarantee access and clarity for people with disabilities and cognitive barriers in physical and digital channels, aligning all communications from the Group's brands with accessibility standards and facilitating inclusive customer service.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
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- **Accessible communications guide:** MasOrange has begun developing a **guide setting out clear accessibility requirements** for creative agencies, media agencies and designers to ensure that all content meets these criteria and removes barriers for people with disabilities or cognitive difficulties. The project is applicable to all the Group's brands.
- **Internal training in digital accessibility: informative training on digital accessibility for internal technical profiles** (product owners, designers, layout designers) to improve their understanding and application of accessibility criteria in the digital channels of all the Group's brands. These sessions have heightened the technical team's awareness and specialisation in this area.

Entrepreneurship and social action

In 2025, MasOrange promoted various social impact initiatives to revitalise rural areas, facilitate solidarity, ensure connectivity in times of crisis and strengthen digital education and protection for adults and children:

- **Promoting start-ups to revitalise rural areas:** The Yoigo brand has continued the **¡QUÉ VIVAN LOS PUEBLOS! (LONG LIVE VILLAGES!)** initiative to promote start-ups that have a positive impact on rural communities, curbing the exodus to cities. MasOrange has developed a structured acceleration programme offering tools, guidance and support, comprising internal and external resources for selecting, evaluating, monitoring and backing start-ups. Since its launch in 2023, the programme has promoted numerous social and economic impact projects in rural areas.
- **Social action platform:** Yoigo has promoted the **“Pienso Luego Actúo” (“I think, then I act”)** platform, which gives a voice to people working to change the world and facilitates citizen collaboration with impactful causes. The platform brings together over 1,000 initiatives and allows easy participation through its search engine, amplifying its reach with digital campaigns. Outcomes are monitored with KPIs and brand tracking for evaluation and optimisation. It has triggered an increase in charitable acts and donations, enhancing the platform's ability to generate social impacts.
- **Connectivity in emergencies:** MasOrange has implemented the **“Communication during natural crises”** initiative to provide free connectivity for people affected by natural disasters or conflicts, including free mobile data and call vouchers, as well as free international calls and SMS to Ukraine. This initiative was available throughout 2025, increasing communications from MasOrange's Spanish lines to Ukrainian numbers and facilitating contact with family members and essential services in crisis situations.
- **Free mobile data allowances:** In July, August and December 2025, Jazztel and Simyo launched **Extra Mobile Data Allowances**, giving their customers additional data to facilitate connectivity during the holiday months and in areas with limited access.
- **Funding awareness projects:** MasOrange has reaffirmed its commitment to **scientific dissemination** and environmental awareness by premiering **'Hope'**, a docuseries directed by Javier Peña for which Orange was the main financier. The project documents the current state of our planet and focuses on real regenerative solutions, demonstrating that technology and human action can reverse environmental impact. By supporting this type of narrative, Orange is establishing itself as an active agent in the cultural change necessary for ecological transition. The Company is facilitating the dissemination of scientific knowledge to society in an engaging and inspiring way. The Company's involvement in 'Hope' highlights its firm belief that sustainability requires technical solutions and an informed, engaged citizenry.

**Protection of children and adolescents in digital environments**

MasOrange supports **Giga**, the global initiative by UNICEF and the ITU that seeks to connect all schools in the world to the Internet by 2030. Giga is working to close the educational digital divide through school mapping, infrastructure and open technology solutions. Through its partnership with UNICEF Spain, MasOrange is contributing to this international effort aimed at ensuring that millions of children have access to secure connectivity and better educational opportunities. MasOrange's employees have themselves contributed to this cause with their donations.

- The Group organised a **working day at the Spanish Senate** to address the protection of children and adolescents in digital environments. The purpose was to listen to children and adolescents, present protection measures promoted by MasOrange and other technology companies, and discuss regulatory needs with the main parliamentary groups. Held in February 2025, the workshop was attended by adolescents from La Pinza, industry companies, senators and MPs from various parties, and influencers.
- **TúYo** is a pioneering proposal designed to accompany families in introducing their children to their first mobile phone, facilitating responsible digital education. The rate includes control and support solutions —such as usage management, content supervision and security features— developed in collaboration with digital well-being specialists such as Empantallados⁵⁰. This approach has heightened collaboration with expert organisations and brought growing recognition among educational and social organisations, as well as a warm welcome from user families.
- **MasOrange is actively involved** in forums for dialogue and awareness-raising on children's digital rights, in many cases alongside UNICEF. Besides this collaboration, the Group works with organisations such as Save the Children and Empantallados on initiatives that promote the safe, responsible use of technology among children and families. MasOrange has also attended industry forums such as the Mobile World Congress, through the “For Good Connections” space, Orange's initiative aimed at promoting healthy digital habits and preventing risks such as hyperconnection, inappropriate content and cyberbullying. Through this set of actions, MasOrange is helping to raise social awareness of children's digital rights and enhancing its position as a leading player in this field.

Additionally, MasOrange, through the Orange Foundation and the Euskaltel Foundation, develops programs for Spanish society that create opportunities for groups in situations of vulnerability, offering training in digital skills and helping to reduce social and territorial gaps.

⁵⁰ A non-profit platform that helps families educate their children in the proper use of technology.



Sponsorships, donations and contributions to non-profit organisations

MasOrange has a fundamental social objective, which is to **contribute positively to society and the well-being of its local communities** by participating in national and international associations and initiatives to encourage digital transformation, innovation, competitiveness and fair and inclusive development.

In 2025, the Group continued to support football as Real Madrid's official telecommunications partner in Spain, as well as music through the Mad Cool festival. It also promoted the Euskaltel Euskadi cycling team's "orange tide" and Telecable Hockey in Asturias.

These sponsorships are part of the Group's identity, offering the best event experience thanks to the quality of its state-of-the-art networks and innovative actions that bring attendees closer in a unique, exclusive way.

The Group also **collaborates with non-profit organisations**, such as the Red Cross, Save The Children, Asociación Cultural Avanza ONG, CEOE, Cepyme, B Corp and the United Nations Global Compact, among others.

Social impact	2025	2024	% variation
Donations and sponsorships for foundations and non-profit associations	\$6,731,665	\$6,321,430	6.49% ⁵¹

⁵¹ The 2024 figure has been adjusted to include all donations and contributions to non-profit foundations and associations.



Metrics and targets

Targets related to managing material impacts, risks and opportunities on consumers and end-users (S4-5)

MasOrange has set a number of targets for the management of material impacts and opportunities related to its consumers and end-users, as well as monitoring the effectiveness of all the actions carried out. These targets, presented below, are aligned with the Group's objectives:

Strategic pillar	Topic	Description of the target and aspiration for 2027
Secure connectivity and customer experience	Customer experience	Maintain customer experience leadership 500,000 customers of sustainable services
	Cybersecurity	0 critical incidents Continue developing the Cybersecurity Master Plan Establish Data Champions*
	Data security and privacy	Update the legitimate interest balancing test under the new EDPB guidelines ⁵²
Digital equality	Society	Cumulative 50,000 beneficiaries of the “Todo por Aprender” programme Total of 300,000 beneficiaries of digital training programmes*

*Note: these targets have been set with a view to the coming year, 2026.

Customer experience and satisfaction

In terms of customer experience, MasOrange has set itself the recurring goal of continuously improving user satisfaction by reducing the percentage of incidents (“strikes”). Monitoring these indicators will enable corrective actions to be prioritised and improvements to be measured.

MasOrange's Customer Satisfaction area has set itself the goal of maintaining a high overall customer rating for all its brands. It performs quarterly measurements and continuous monitoring, guiding decisions and improvements that enhance positive impacts for consumers and end-users and ensure their satisfaction with the Group.

Innovation and new services

All of MasOrange's strategic lines of innovation and new services have the overall objective of increasing the customer base during the year, winning new users and stimulating satisfaction and loyalty.

MasOrange will also monitor the effectiveness of the new initiatives to be launched in the coming year, as described above in the section “Actions related to consumers and end-users (S4-4)” in this chapter.

⁵² European Data Protection Board (EDPB).



Cybersecurity

The Group has set itself the goal of raising and maintaining a high level of cybersecurity maturity, measured by means of a diagnosis against a predefined scale that assesses the evolution of the main processes and controls. This will enhance management of material risks and opportunities affecting consumers and end-users, and includes periodic assessments, definition of improvement plans and monitoring of implementation.

MasOrange also intends to assure zero critical cybersecurity incidents at all times.

The Group aims to continue developing the Cybersecurity Master Plan in the coming years, as well as training and awareness-raising activities in this area.

Data security and privacy

MasOrange has set a data privacy target for 2026 of establishing DataChampions in the Company to further embed the principle of diversity beginning with the design phase of operations.

The Group plans to update its legitimate interest balancing test models in 2026 under new guidelines from the European Data Protection Board.

Connectivity and socio-economic development

In rural areas, MasOrange maintains the permanent objective of expanding and adapting its offering to ensure connectivity and digital inclusion throughout the territory. The Group is working on this pledge through the roll-out of 5G (UNICO Móvil Project) and fibre optics (PEBA/UNICO plans), as well as other specific initiatives.



Society

MasOrange has set itself a series of digital skills targets to be met by mid-2026:

- Reach 12,000 beneficiaries of Mayores Conectados (Connected Seniors). This initiative, which was already implemented during 2025, aims to train citizens aged over 60 throughout Spain in digital skills through free face-to-face courses.
- Reach 18,387 beneficiaries of 5G-AI training programmes. The plan is to train residents of the Madrid region, preferably unemployed people under the age of 35, in the latest technological advances to help improve their chances of finding a job.
- Reach 13,600 beneficiaries of Todos Conectados (Everyone Connected). This initiative seeks to extend digital training throughout Spain through face-to-face courses in basic digital subjects.
- Reach 7,380 beneficiaries of Reto Rural Digital (Digital Rural Challenge), training the elderly, women, young people and jobless people in digital skills.

Information on governance





4. Information on governance

Business conduct (ESRS G1)

MasOrange reaffirms its belief in the values of transparency, ethics and responsible management, addressing matters including the fight against corruption and bribery, responsible supplier management, transparency in activities and commitments related to the exercise of political influence.

Key indicators

Strategic pillar	Topic	2025 milestones
Governance and business ethics	Transparency	Sustainable Fitch ESG Entity Rating: 79 points, the leader in Europe Clarity AI ESG Rating: 82 points, the leader in Spain 96% of employees trained in compliance, corruption, conflicts of interest and criminal prevention
	Corporate culture	96% of employees trained in cybersecurity 97% of employees trained in information security
	Data protection, AI and cybersecurity governance	AI system approval procedure
	Relationship with suppliers	95% of European suppliers and 85% of Spanish suppliers ISO 37001: Anti-Bribery Management Systems UNE 19601: Criminal Compliance Management System ISO 27001: Information Security Management Systems
	Management system certifications	ISO 27701: Information Privacy Management National Security Scheme (ENS), high-category certification ISO 22301: Business Continuity Management Systems EMAS system: Service Quality and Billing Quality



Governance

The role of governing bodies (ESRS 2 GOV-1)

MasOrange bases the execution of its control and management functions on **principles of transparency, ethics and responsible management** so as to promote a culture of integrity and responsibility in all its territories and operations, and with all the people who make up the organisation. The Group's **Corporate Governance Model** reflects a commitment to best practices in good governance, ethics and corporate responsibility in all areas of its activity.

The Group has a set of bodies, control mechanisms and internal rules forming the **Corporate Governance System**. Among others, objectives include managing and regulating the Group's organisation transparently and effectively while promoting the common interest and stakeholder interests, as reflected in its Corporate Governance Policy.

They ensure **good corporate conduct** as the basis for all the Group's activities. The main bodies are: the General Shareholders' Meeting, Board of Directors, Audit and Risk Committee, and Remuneration Committee. For its part, the Management Committee assumes collective responsibility for defining the Company's strategy, coordinating the organisation's areas, making key decisions on investments and projects, and overseeing fulfilment of objectives, ensuring the organisational culture is firmly focused on good governance.

The members of the Group's administrative, supervisory and management bodies (Board of Directors, Audit and Risk Committee, Remuneration Committee and Management Committee) have the **necessary experience in business conduct**, having been selected on the basis of their knowledge and track record within each body's specific remit. They all receive regular specialised training in compliance and business conduct, ensuring that they have up-to-date, sound knowledge of these aspects, which are essential to the Company. For further information, see the section "The role of the administrative, supervisory and management bodies (GOV-1)".



Impact, risk and opportunity management

Description of the processes to identify and assess material impacts, risks and opportunities (ESRS 2 IRO-1).

During the double materiality assessment, MasOrange analysed its context, strategy and business model to identify the factors that could influence business conduct. Set out below are the relevant material impacts⁵³ resulting from the analysis, indicating where in the value chain they originate, their effect, whether they affect the environment or society, and their link to the strategy or business model:

Topic	Value chain	Brief description	Effect on society	Link to strategy
Corruption and bribery	Own operations	Actual short-term positive impacts: - MasOrange has mechanisms and procedures in place to prevent money laundering and terrorist financing, such as the Anti-Corruption Policy, Criminal Prevention Policy, Conflict of Interest Policy and Gifts and Invitations Policy, as well as UNE 19601:2017 certification for criminal compliance management systems, having a positive impact on the fight against corruption and bribery. - MasOrange's stance against corruption and influence peddling remains firm through the Anti-Corruption Policy, promoting transparency, which has a positive anti-bribery effect.	Prevention of corruption and promotion of ethical business practices.	Basis for MasOrange's ordinary activities

⁵³ Bear in mind that no material negative impacts, risks or opportunities have been identified.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Topic	Value chain	Brief description	Effect on society	Link to strategy
		Actual short-term positive impacts: - MasOrange has a Global Corporate Governance Policy reflecting a firm commitment to good governance practices and transparency, which positive impacts the MasOrange Group's business conduct. - MasOrange has a tax policy geared towards regulatory compliance (in accordance with binding resolutions from the Administration and/or national and EU case-law) and good tax practices, which has a positive impact on good governance.	Contribution to good business, regulatory and tax practices.	Key to promoting business conduct committed to good practices
Corporate culture	Own operations	Actual short-term positive impacts: - MasOrange has a positive, inclusive, dynamic corporate culture that favourably impacts its employees through talent attraction and retention. - There is an anti-fraud policy reflecting its firm commitment to combat fraud, nurturing a corporate culture based on ethics and honesty, which has a positive impact on crime prevention. - MasOrange participates in environmental certifications and initiatives to publicise its environmental, social and good governance performance (CDP, S&P, Fitch, Sustainalytics or Clarity AI and 'B Corp' certification, EcoVadis, etc.), positively impacting good business conduct.	Social inclusion, talent retention and promotion of ethical business conduct.	Strategic approach in a positive corporate culture



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Topic	Value chain	Brief description	Effect on society	Link to strategy
Management of relationships with suppliers	Own operations	Actual short-term positive impact: MasOrange has a Supplier Code of Conduct requiring suppliers to observe a series of social, environmental and business ethics principles, which has a positive impact on crime prevention.	Promotion of sustainability and ethical conduct in the value chain, helping to mitigate risks for MasOrange.	Embedding of principles in supplier relationship management
		Actual short-term positive impact: MasOrange's suppliers have to adopt the principles and values reflected in the Group's Code of Ethics and Supplier Code of Conduct. They can also participate in the JAC alliance services and the EcoVadis platform for sustainability assessments, enhancing their business conduct and management, which has a positive impact on MasOrange's relationship with them.	Encouragement of transparency and ethics in business and in business relationships.	Key to MasOrange's activity through supplier relationships

Further information on the double materiality process undertaken to identify material impacts, risks and opportunities related to business conduct can be found in the disclosure requirement "Description of processes to determine and assess material impacts, risks and opportunities (IRO-1)" in the General disclosures chapter.



Corporate culture and business conduct (G1-1)



MasOrange nurtures a corporate culture based on solid values: customer focus, positive attitude, pragmatism and collaboration. These principles guide its pledge to becoming the leading company in talent, innovation and positive impact on society and the planet.

This approach is reflected in its purpose, vision and values, defined as follows:

Mission



Purpose: (Re)connect people with technology to assure the best experience.

- Humanise technology, facilitating communication between people and bringing them closer together wherever they are.
- Accelerate access to innovative services, collaborating with the world's best undertakings while protecting customers and their data.
- Offer customers an easy, simple, hassle-free experience.



Vision



Vision: To be the leading company in customer satisfaction, talent and positive impact.

- Create the company that has the best positive impact in Spain, thanks to its respect for people and the planet.
- Make technology accessible to all.
- Develop new services that are useful to our customers.
- Have the best talent: "good people, nice people".
- Contribute to society through technology and connectivity.

The Group's values



Customer first:

- Take care of each customer, avoiding problems.
- Offer innovative, quality solutions.
- Be the trusted company for customers and partners.



Positive attitude:

- Work with enthusiasm and optimism, sending out «good vibes».
- Keep an open mind and adapt to changes.
- Learn from mistakes and celebrate success together.



Pragmatism:

- Be practical and fast: seek simple solutions.
- Be doers: make decisions and implement them rigorously.
- Avoid bureaucracy. Focus on solutions, not on the process.

**Collaboration:**

- Work as a single team seeking the best for the Company.
- Be constructive and speak respectfully, face to face.
- Avoid egos: help each other with humility and empathy.

Policies related to corporate culture and good business conduct (MDR-P)

MasOrange's corporate policies, aligned with international reference frameworks such as COSO, are developed in accordance with approved internal guidelines to ensure the reliability of financial and non-financial information. They are also designed to identify, quantify, report and control risks that may affect the Group's strategies, always within the risk appetite defined by the Board of Directors.

As mentioned previously, all MasOrange's corporate policies are reviewed by the Audit and Risk Committee, which submits them to the Board of Directors for approval. Once approved, they are published on the Group's intranet, accessible to all employees, and on the corporate website, applying to the entire organisation.

The Group has specific good governance policies, including:

Policies	Brief description
Global Corporate Governance Policy	It sets out the fundamental aspects of corporate governance and the Company's commitments. The policy also provides the basic guidelines for developing MasOrange's internal regulations so as to foster orderly regulatory development. It was approved by the Group's Board of Directors and is available on the Group's website and corporate intranet. The policy applies internally to MasOrange.
Anti-Corruption Policy	It establishes the principle of zero tolerance for corruption and influence peddling in the Group's activities. The policy was approved by MasOrange's Board of Directors and is available on the corporate website. It applies to all MasOrange's Board directors, managers and employees, and all parties associated with the Company must comply with it.
Conflict of Interest Policy	It lays down the basic principles for identifying and preventing conflicts of interest, reinforcing ethical conduct in business, and applies to both the Board of Directors and the Group's managers and employees. The policy was approved by the Board of Directors and is available on the MasOrange website.
Gifts and Invitations Policy	It establishes guidelines for the acceptance and offering of gifts and invitations that apply to all the Group companies' Board directors, administrators, managers and employees. The policy was approved by the Company's CEO and is available on the MasOrange website.
Criminal Prevention Policy	It prohibits the commission of crimes and puts measures in place to prevent criminal risks in MasOrange's activities and in its relations with third parties. The policy was approved by the Board of Directors and is available on MasOrange's website. All the Group companies' Board directors, administrators, managers and employees must be familiar with, comply with and apply it.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Policies	Brief description
Economic Sanctions Compliance and Trade Control Standards Policy	It establishes a framework of principles in line with MasOrange's commitment to conducting its business with integrity. Measures are included to prevent non-compliance with economic sanctions and trade control regulations through awareness-raising and training, advice and information, the duty to report, due diligence procedures, oversight and documentation. It was approved by the Company's CEO and is available on the corporate website. The policy applies to the Group's Board directors, managers and employees.
Internal Control Policy	It lays down a framework for the management of the Internal Control System guaranteeing process efficiency and security. The policy was approved by the Company's Board of Directors and is available on the MasOrange website. It applies to all the Group's employees and managers, who must comply and take it into account in all their activities.
Risk Control and Management Policy	It establishes a framework of principles ensuring that risks that may affect MasOrange's strategies and activities are identified, quantified, communicated and controlled within the risk appetite defined by the Board of Directors. The policy was approved by the Company's Board of Directors and is available on the corporate website. It applies to all the Group's companies, divisions and departments.
External Auditor Relationship Policy	It ensures that MasOrange is audited by an independent firm with the necessary capabilities to carry out its work effectively and responsibly, and in accordance with applicable legislation and the Audit and Risk Committee Regulations. The policy was approved by the Board of Directors and is available on the corporate website. It applies to all the Group companies and their members.
Competition Policy	It states the Group's condemnation and zero tolerance of competition law infringements, fostering a corporate culture of honesty, integrity and transparency in all business activities. The policy was approved by the Board of Directors and is available on the corporate website. It applies to all MasOrange Board directors, administrators, managers and employees.
Tax Policy	It sets out the principles on which the Group's tax strategy is based, its commitment to comply with tax regulations and the application of good tax practices. The policy was approved by MasOrange's Board of Directors and is available on the corporate website. It applies to all the Group's members.
Internal Information System Policy	It establishes a system regulating the Ethics Channel, for the reporting of legal violations, internal policies and ethical standards within the Group. The policy's purpose is to enhance ethics and compliance, help detect and correct weaknesses, and reduce reputational and financial risks. The document describes the Ethics Channel management principles, such as accessibility, communication and confidentiality, as well as specific alert processing procedures. It also establishes a commitment to protecting whistleblowers, ensuring confidentiality and preventing retaliation, while managing alerts through clear procedures and ensuring compliance with data protection regulations. This policy was approved by the Board of Directors, is available on the Group's corporate website and applies to all Ethics Channel users, including MasOrange's own workforce.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Policies	Brief description
IA Use Policy	It sets out the general principles and guidelines that must be observed when using, designing, developing, providing and/or distributing Artificial Intelligence systems, as well as products or services that directly or indirectly use AI, in order to comply with the corresponding Regulatory Framework and mitigate the risks to the MasOrange Group, as well as those that the use of AI could entail for the rights and freedoms of individuals. This policy was approved by the Group's Board of Directors and is available on its website.
IA Usage Procedure	It describes the conditions of use of AI systems for Group employees and was approved by MasOrange's AI Committee.

There are other relevant policies which, though presented in different sections of the Report, are intrinsically related to the principles of good governance and responsible business conduct. These include the Code of Ethics, the Supplier Code of Conduct and the policies on Information Security, Privacy and Data Protection Management, and Global Security. Other notable policies include Business Continuity, Occupational Health and Safety, Procurement, ESG, Environment and Energy, and Quality. All these policies, from their respective areas, bolster the organisational commitment to ethics, transparency, sustainability and responsible management, demonstrating the cross-cutting nature of good governance throughout the corporate structure.

Thanks to these policies, MasOrange manages all of its material IROs related to Business Conduct.

Compliance

Although MasOrange does not consider non-compliance with the law to be a material risk, it should be noted that it takes the necessary steps to comply with legislation in the markets and territories in which it operates.

The Group's actions are grounded in a culture of compliance in which the Code of Ethics is the cornerstone, laying down the obligation to act in accordance with prevailing legislation at all times, as well as with our principles and values.

The Group has a number of tools at its disposal to enable compliance:

It has a system for monitoring regulatory changes through the Legal, Assurance and Regulation area, which monitors and reports on legislative changes internally to ensure awareness, so that any necessary internal processes can be modified.

The organisation undergoes internal and external audits to verify compliance. In some cases, these systems are supported by alerts reporting on new legislation. The organisation also has EMAS certification (under Order IET/1090/2014, on service and billing quality) and AENOR high-category certification under the National Security Scheme.



Criminal Compliance Management System

The Group's Board of Directors, in the Criminal Prevention Policy, expresses a firm condemnation and zero tolerance of any criminal offence, as well as any kind of act contrary to MasOrange's principles and values in all areas of business and in its relations with third parties, such acts not being justifiable because they benefit the organisation in any circumstances.

The Criminal Compliance Management System also defines a series of controls and responsibilities for implementation in order to ensure compliance with applicable legislation. Regular checks are carried out to make sure these controls have been implemented and are effective, thus limiting the risks associated with non-compliance.

MasOrange's priorities includes nurturing a strong corporate culture of regulatory compliance that stimulates honest, ethical, transparent professional conduct, where the Company's ethical principles and values are central to its activities and decision-making.

The Group's actions are intended to minimise the organisation's exposure to criminal risks, in line with the principle of due control, assuming compliance with the commitments described in this Policy and in the Criminal Compliance Management System, which can be summarised as follows:

- Prohibition on the commission of crimes.
- Identification, in the Criminal Prevention Manual, of activities in which crimes that must be prevented might be committed.
- Surveillance, prevention and punishment of criminal or fraudulent acts and conduct.
- Compliance with the law and internal regulations, both by the Company's employees, Board directors and managers and, where applicable, by third parties.
- Acceptance of internal control systems for financial and non-financial information as a way of preventing and controlling internal fraud.
- Establishment of a general framework for setting, defining, reviewing and achieving criminal compliance objectives that promotes effective control and communication mechanisms, as well as employee awareness, so as to prevent crimes and thus avoid fraud, corruption and bribery.
- Compliance with the requirements of the Criminal Compliance Management System and, should illegal conduct be detected, appropriate reaction and implementation of the relevant measures, whether disciplinary or, where appropriate, before the relevant authorities.

The Chief Compliance Officer is a key component of the criminal compliance management system, reporting directly to the Board of Directors through a direct reporting line via the Audit and Risk Committee, this being the Board committee in charge of overseeing the effectiveness of internal controls.

The Chief Compliance Officer reports to the Audit and Risk Committee and, where appropriate, to the Board at least once a year, on the most important aspects of the activities carried out during the previous period, as well as on plans and priorities for the following financial year. Additional specific reporting is also provided at the request of the Audit and Risk Committee or when the Chief Compliance Officer is asked to do so, as needed in certain circumstances or situations relevant to the Board of Directors or in the ordinary course of business.

Finally, in 2025, Aenor Confia, S.A.U. certified that MasOrange has a Criminal Compliance Management System in accordance with the UNE 19601:2017 standard and an Anti-Bribery Management System in line with the ISO 37001:2016 standard.



Ethics Channel

To ensure compliance with internal policies and the Code of Ethics, MasOrange has an Ethics Channel accessible to employees, managers, external collaborators and third parties via the corporate intranet and the Group's websites.

It allows confidential, anonymous reporting of any infringements related to the following matters:

- Corruption, conflicts of interest and fraud.
- Ethics.
- Accounting, internal control and auditing.
- Human rights and fundamental freedoms.
- Health and safety.
- Environment.
- Other infringements of laws and regulations.

Access to the channel can be gained via the external tool accessible from the corporate intranet, from MasOrange's corporate website (<https://masorange.integrityline.com/>) and from the websites of the various commercial brands managed by the Group.

The Group's Ethics Channel management procedure, set out in the Internal Information System Policy, regulates the receipt and processing of complaints and queries. They are managed by the Chief Compliance Officer under Board supervision and in accordance with current regulations. The system guarantees confidentiality and, when required, the whistleblower's anonymity, unless prevented by a legal obligation. It also protects against possible reprisals, in line with MasOrange's pledge not to apply discriminatory measures against those who report legal infringements or internal breaches in good faith. Any retaliation must be reported immediately to the Chief Compliance Officer to trigger the relevant protection mechanisms.

MasOrange's Ethics and Compliance Committee, an autonomous, independent internal body, comprises the Chief Compliance Officer, Chief People Office, Chief Financial Officer, General Manager of Legal and Assurance, Internal Audit Director and Compliance Manager. The committee's mission is to coordinate and promote compliance with the Code of Ethics and related policies among all stakeholders: employees, suppliers, customers and shareholders. Its main functions include managing and resolving alerts received, ensuring the confidentiality of the process; referring complaints to the relevant areas for investigation; and proposing improvements to the compliance approach, based on incidents detected, suggestions received or regulatory changes, thus ensuring it is continuously updated and adapted to the Group's reality.

In 2025, 322 reports were received through the Ethics Channel⁵⁴, most of which were unrelated to ethical issues (customer service complaints). Only 20 led to investigations by the Compliance Department, which were reported to the Ethics and Compliance Committee and the Audit and Risk Committee/ Board of Directors through the Annual Ethics and Compliance Report. No breaches of the Compliance Management System were identified during the

⁵⁴ The Compliance team monitors the number of alerts received through the Ethics Channel, as an indicator that this channel is known and trusted.



year, confirming the adequacy and effectiveness of the controls in place. So there was no need to activate specific action plans associated with situations of non-compliance.

Taxation

MasOrange's tax strategy is essential designed to ensure compliance with regulations based on a reasonable interpretation of the rules and taking account of binding resolutions from the Administration and/or national and EU case-law, coupled with a commitment to applying good tax practices.

These good practices refer to both compliance tasks and ongoing business advice, as well as participation in special projects and our relationship with the tax authorities. The overall goal is to avoid tax risks, seeking efficiency to support the Company's business strategy.

This tax policy is reflected in the payment of direct and indirect business taxes, which has a positive impact on long-term value creation and promotes the country's economic development.

There follows a breakdown of tax information by country related to the Group's activities:

€ thousand	2025		2024		% variation	
	Spain	Colombia	Spain	Colombia	Spain	Colombia
Net profit	-346,302	582	-582,911	94	-46.77%	519.15%
Corporate income tax	24,274	-348	112,824	-90	-88.72%	286.67%
Grants received	187,413	0	133,513	0	40.37%	-

**Actions related to corporate culture and good business conduct (MDR-A)****Corporate culture**

In 2025, the Group worked on implementing a single cultural model across all the MasOrange companies. The aim is to standardise the working conditions of all employees, which may show disparities following the 2024 merger.

To nurture cultural integration within the Group, MasOrange has a business conduct training policy and achieved the following milestones in 2025:

- 96% of employees trained in compliance, anti-corruption, conflicts of interest, gifts and invitations, and the Ethics Channel.
- 96% of employees trained in cybersecurity.
- 97% of employees trained in information security.

Data protection, AI and cybersecurity governance

The Company is aware of the importance of information security and the protection of personal data for all its stakeholders, and has a robust data protection governance model in place.

To ensure strict compliance with data protection obligations by all Group companies, the Group has a specific data protection approach.

This approach, together with the functions and obligations assigned to each individual within it, are internally established and developed, including the following roles or positions relating to the day-to-day management of all personal data processing-related matters:

The Group has a Data Protection Officer (DPO) who has been assigned the legally stipulated powers and can be contacted by email at dpo@masorange.es. The DPO's functions are as follows:

- Reporting and advising on the design of initiatives proposed organically within the MasOrange Group.
- Overseeing fulfilment of the GDPR on-site.
- Managing data protection risks.
- Controlling organisational functions, such as building a record of processing activities, reviewing processing operations and conducting impact assessments.
- Defining and regularly updating data protection policies.
- Carrying out investigative functions.
- Having access to the entire organisation to perform the advisory function.
- Coordinating and supervising awareness and training for personnel involved in processing operations, and the corresponding audits.
- Cooperating with the supervisory authority and acting as its point of contact for matters relating to personal data processing.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

The Spanish Data Protection Agency was notified of the appointment of the MasOrange companies' current DPO on 30 September 2024, the aim being to ensure consistency in policies, procedures and criteria. Under Article 39 of the GDPR, the DPO is assigned the functions envisaged in the GDPR itself and in applicable legislation, as well as any other functions entrusted to the office internally. These functions were approved by the Group's internal bodies and reported to the Company's Board of Directors, to which the DPO reports periodically.

The Privacy Office was also set up to provide the DPO with an organisational structure capable of meeting the Group's increasing data protection needs.

- **Privacy Office**

The Data Protection Officer will have a support office to carry out his or her duties, its main, but not its only, mission being to advise and inform the Group's companies on data protection matters, ensuring their effective compliance with data protection legislation, together with the Data Protection Officer.

- **Privacy Committee**

The Privacy Committee, which is part of the Global Security Committee, is responsible for making decisions that affect data protection, as well as for monitoring the Group's compliance with legislation in this area.

It was set up in 2025 and held its first meeting in November, when internal privacy procedures were approved and KPIs and risks relating to privacy were discussed.

- **Area data protection officer**

This role is an area point of contact with the Privacy Office, responsible for certain tasks assigned by law to the Data Controller, which may be delegated, but for which the Data Controller will always be responsible.

- **Resource manager**

This role is a point of contact with the Privacy Office for technical matters related to the systems that support data processing: functionalities, access, segregation of duties, authorisations and other security measures.

- **Personal data governance tool**

Since 2024, MasOrange has been using OneTrust as its privacy management tool, specifically for managing the record of processing activities and undertaking data protection impact assessments.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

- **Adherence to codes of conduct**

MasOrange remains adhered to the Autocontrol Code of Conduct for data processing in advertising activities and to the Code of Conduct under the terms of Article 40 of the GDPR, which have been applied since 2023 and 2024, respectively.

- **Artificial intelligence**

The use of artificial intelligence systems continued to grow in all areas of the Company during the current year. The Privacy Office, set up in 2024, integrates and coordinates the MasOrange Group's AI governance system, ensuring respect for the rights and freedoms of individuals in the development, use and marketing of these tools, from the design stage and by default.

Also in 2025, MasOrange implemented a procedure for approving AI systems so that the systems used, developed or distributed by the Group do not pose any risks to the Company or individuals.

This allows issues related to ethics and digital rights to be detected before implementing any AI model or system. As regards reporting and investigating issues, MasOrange will put mechanisms in place to monitor and audit approved systems and models throughout their useful life at MasOrange.

Corporate cybersecurity

In recent years, telecommunications operators have become the target of all kinds of external attackers, with motivations ranging from fraud and data theft to reputational damage or a simple desire for notoriety.

MasOrange's mission in relation to cybersecurity is to guarantee the day-to-day running of the business by means of policies, standards, procedures and tools, while protecting assets and services using appropriate security technologies and raising awareness among the MasOrange people. The Group's vision is to be the customer's trusted operator through the provision of responsible services and technologies.

Cybersecurity services are structured around a control model focused on the prevention, identification and resolution of any threat, using a three-line-of-defence approach to implement, govern and audit cybersecurity management in the Company.

Information security management is carried out by the **Cybersecurity Committee**, which acts as a collegiate body with ultimate responsibility for cybersecurity. There is also a Cybersecurity Department with specific functions and objectives underpinning the security of information and services from the design stage throughout the entire organisation.

Security implementation begins in the design stage itself, as a continuous process responding to the need to implement mechanisms, processes and culture that will assure security throughout the software life cycle, with an emphasis on the earliest stages, so as to avoid cost overruns and damage to the Company. In 2025, level 3 of the SLSA (Supply-Chain Levels for Software Artefacts) framework was reached, integrating formal controls into SDLC (Software Development Life Cycle) and continuing to implement measures to ensure the delivery of products and services that meet the required security standards.

To maintain protection of systems over time, MasOrange continuously monitors vulnerabilities. The Group applies standards such as CVSS (Common Vulnerability Scoring System) and monitors third-party notifications in order to keep systems up to date with new known security breaches.



To provide all employees with the necessary security knowledge that will enable them to carry out their tasks safely, an awareness plan has been defined and implemented in the organisation, consisting of awareness-raising activities based on phishing and social engineering simulations or information capsules.

Targets related to corporate culture and good business conduct (MDR-T)

Strategic pillar	Topics	Description of the target and aspiration for 2026
Governance and business ethics	Corporate culture	Cultural integration index > 8/10 ⁵⁵
	Artificial intelligence	Implementation of controls adapted to ISO 42001 in the AI governance system 75% of staff trained in the use of ethical, reliable AI

MasOrange has an internal cultural integration index measuring five equally-weighted dimensions through a survey conducted during the year: integration process, strategic alignment, degree of trust, emotional state and cultural assimilation. The Group has targeted a score of 8 out of 10 in the index in 2027, after obtaining a score of 7.1 in 2025.

As regards Artificial Intelligence and digital rights, MasOrange has set two internal targets for 2026:

- Implement controls in the governance system adapted to ISO 42001 for Artificial Intelligence Management Systems, which is certifiable and provides greater legal certainty for customers and other stakeholders.
- Bolster the AI training plan through specific training on ethics, governance and internal processes to ensure ethical and reliable use. The goal is to achieve at least 75% participation in training, promoting AI literacy and reducing risks of non-compliance with policies and procedures.

⁵⁵ Target proposed for 2027.



Management of relationships with suppliers (G1-2)

MasOrange is aware that its daily activity can only be carried out responsibly if it cooperates closely with all the players in its value chain. So it is considered essential to ensure that partners (suppliers, distributors and contractors) share the same ethical values and principles of social and environmental responsibility as the Company, and to convey this commitment transparently to customers and society.

Policies related to supplier management (MDR-P)

In their relationships with suppliers, Group companies have implemented robust, reliable systems to ensure compliance with agreed contractual terms, both with small- and medium-sized enterprises (SMEs) and with large accounts. These arrangements entail efficient, transparent management, avoiding payment delays and fostering commercial relationships based on trust and responsibility.

Specifically, the Company has developed a number of exceptional support measures for situations in which its suppliers are experiencing financial difficulties that could compromise business continuity, whether due to external causes such as a pandemic or internal factors. These measures include prepayments to give suppliers immediate liquidity. They are subsequently reimbursed under payment plans agreed jointly between the Group and the supplier, thus ensuring a balanced, sustainable solution.

MasOrange also has a [Procurement Policy](#) to ensure a sustainable procurement process, enhancing its commitment to environmental protection, public health, conservation of natural resources and reduction of CO₂ emissions. The policy sets out a global framework for managing the risks associated with the acquisition of equipment and materials, as well as the contracting of services. It states that the Procurement Department must have an active relationship with suppliers, as well as assuming risk management, while the areas requesting products or services are responsible for ensuring compliance with contractual conditions, among other aspects.

The Group also has a [Supplier Code of Conduct](#) whereby suppliers commit to upholding the principles and values of the Group's Code of Ethics. It establishes specific human rights criteria such as the rejection of forced and child labour, non-discrimination, freedom of expression and the defence of collective bargaining.

For further information, see the section “Policies related to value chain workers (S2-1)”.

MasOrange believes in continuously evaluating and monitoring its supply chain to ensure respect for human and labour rights. The Group recognises the importance of its suppliers complying with the Supplier Code of Conduct, which sets rigorous standards in environmental, social and sustainable procurement matters.

All MasOrange suppliers are required to include in their contracts the provisions of the Code of Conduct and environmental requirements regarded as good practice. If a supplier does not adhere to the MasOrange Code of Conduct, it must guarantee that its own code is equivalent and contains the same principles. Any breach of this code allows the Group to immediately cancel existing agreements and not enter into new contracts with that supplier.

MasOrange also ensures that its suppliers are well informed about various corporate policies, such as those related to ESG and Energy Management, thus ensuring proper implementation. To achieve this, the Group fosters awareness through regular communications in which it shares sustainability progress and achievements, and provides support to both suppliers and franchisees so as to foster a long-term sustainable impact.

**Actions related to supplier management (MDR-A)**

MasOrange understands that relationships with suppliers are strategic in ensuring the sustainability and resilience of its supply chain. So it works with suppliers who share the same values and commitments, making sustainability and social commitment an integral part of its supplier approval and selection process. With this in mind, MasOrange embeds the following social and environmental criteria into the process:

- **Environmental criteria:** Priority is given to suppliers who implement sustainable practices, promoting the use of recyclable materials and responsible production processes, and monitoring their own supply chains.
- **Social criteria:** commercial relationships that contribute to socio-economic development in our local communities are promoted.
- **ESG assessment:** ESG risk assessments are carried out both when a supplier is registered and on a recurring basis, particularly when certain annual expenditure thresholds are reached.
- **General terms of business and assessments:** Acceptance of these terms implies acceptance of clauses on sustainability, ethics and anti-corruption.

This management of supplier relationships and assessment is carried out centrally by the procurement team, which conducts regular risk assessments (financial, dependency, ESG, ethical and anti-corruption) to identify and mitigate risks such as contractual breaches, price fluctuations, excessive dependency, and reputational or cybersecurity risks. Digital tools such as the Procurement Platform and the Supplier Portal are used to facilitate process monitoring and control assuring traceability and transparency.

MasOrange also undertakes numerous actions to promote sustainable and ethical purchasing practices. These actions are described above in the section “Actions related to value chain workers (S2-4)”.

Targets related to supplier management (MDR-T)

In line with the commitment to sustainability throughout its value chain, MasOrange has set a number of targets relating to supplier contracting. The targets are described above in the section “Targets related to value chain workers (S2-5)”.



Prevention and detection of corruption or bribery (G1-3)

The MasOrange Group has a zero-tolerance policy for corruption and any form of influence peddling in its operations. The Board fosters a culture of

Policies related to corruption and bribery (MDR-P)

The MasOrange Group has an **Anti-Corruption Policy** approved by its Board of Directors on 27 June 2024, setting out a clear framework of principles, prohibited conduct and rules of conduct in the fight against corruption and influence peddling. The policy is mandatory for all the Group's Board directors, managers and employees and is publicly available on the corporate website.

The policy was designed to align with the highest international standards, including:

- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997).
- United Nations Convention against Corruption (2003).
- United States Foreign Corrupt Practices Act (FCPA).
- United Kingdom Bribery Act (2010).

Compliance with these regulations extends to all parties involved in MasOrange's activities, including partner companies, subcontractors, associates, advisors and intermediaries acting on its behalf.

The Group's Chief Compliance Officer is responsible for implementing and coordinating the necessary actions to ensure observance of the Criminal Compliance Management System, as well as managing the Ethics Channel, in line with the provisions of the Internal Compliance Function Charter. Investigations following reports of possible cases of corruption or bribery received through the Ethics Channel are carried out by independent teams with no direct connection to the events under investigation.

The Group prepares an annual Ethics and Compliance Report, which is submitted to the Audit Committee, the Ethics Committee and the Management Committee prior to approval by the Board of Directors.

The Ethics Channel plays an essential role in the Group's compliance system, as it enables the prevention, detection and tackling of any irregular conduct in relation to corruption or bribery. Further information on how it works can be found in the section "Corporate culture and Business Conduct Policies (G1-1)".

All the MasOrange Group's employees adhere to the Code of Ethics and the Anti-Corruption Policy, receiving specific training from the moment they join the Company. They also regularly attend training programmes on the Criminal Compliance Management System, with a special focus on the use of the Ethics Channel, the Gifts and Invitations Policy, and the Conflict of Interest Policy.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

The Group strictly applies the provisions of its Supplier Code of Conduct, which states that any clear breach relating to corruption or influence peddling empowers the Group to immediately suspend or terminate all existing contracts with the non-compliant party.

In cases in which a conflict of interest is detected or may exist on the part of an employee during a procurement process, the employee is required to report the situation using the forms provided by the Group and to refrain from participating in, influencing or accessing information related to the process in question.

MasOrange also conducts an annual analysis of criminal, corruption and bribery risks to identify the most exposed positions and areas, and thus bolster the control and prevention mechanisms in place in the compliance system. Risk positions identified are those that have relationships with third parties: customers, suppliers or the public administration. Currently, 100% of the positions identified as risky are covered by the training programmes.

Actions related to corruption and bribery (MDR-A)

MasOrange implemented various key actions in 2025 for the prevention of corruption and bribery.

Firstly, 96% of employees received corruption, conflict of interest and criminal prevention training. This annual mandatory training, conducted in collaboration with an external company, spans the Anti-Corruption Policy, Conflict of Interest Policy, Criminal Prevention Policy and Ethics Channel. The Compliance Department also issues regular communications to back up this content.

The Group updated its criminal risk map to bolster regulatory compliance and prevent possible infringements within the Company. Due diligence procedures are also in place, carried out by third parties, as well as compliance audits.

MasOrange has included compliance clauses in all supplier contracts, enhancing its commitment to fight corruption.

In addition, the Group has developed a tool designed to increase gift and invitation statements by 5% compared to 2024, as required by the Gifts and Invitations Policy.

The Conflict of Interest Policy ensures an increase in the number of mandatory conflict of interest statements. Under this policy, employees in management or executive positions must submit a mandatory annual statement.

Targets related to corruption and bribery (MDR- T)

MasOrange's main target is to maintain a principle of zero-tolerance for corruption and influence peddling in all activities undertaken within the Group.



Metrics and targets

Confirmed incidents of corruption or bribery (G1-4)

MasOrange's Ethics Channel is available to the Group's Board directors, managers and employees, as well as to all parties with whom we are associated, including society in general.

MasOrange received no convictions or penalties for violating anti-corruption and bribery laws in 2025 or 2024.

Payment practices (G1-6)

MasOrange works with a large number of suppliers from 170 countries, of which around 85% are Spanish.

In 2025, the average payment period was 36.80 days⁵⁶, which was an improvement on the 42.22 days recorded in the previous year. 85% of invoices were settled within the usual payment periods and there are no outstanding legal proceedings for late payment.

The Group's standard payment terms are 60 days from receipt of invoice, although in some cases they may be 30 days or cash on delivery. In certain contracts, the term is calculated from order acceptance or invoice issuance, reducing the payment period. In Spain, the payment terms are uniform, while in Colombia (where Jazzplat Colombia operates), the law establishes a maximum of 45 days, with exceptions of up to 60 days, and the standard term is 30 days for external suppliers.

MasOrange also carries out financial risk assessments on suppliers showing high annual spending.

⁵⁶ The average payment period to suppliers in days for the Group's companies in Spain is included in the Annual Accounts and is audited and verified by the auditors in their annual report.

Appendix





Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Appendix I. Information on the data points covered in this Report

Topics excluded from the double materiality analysis

The IRO analysis focused primarily on the matters described in the ESRS 1 AR 16 list, which allowed a more specific, in-depth approach to these topics. The topics included in this analysis are listed below. Further information on the procedure followed to assess these topics can be found in disclosure requirement IRO-1.



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Topic	Sub-(sub-)topics	Explanation
E2 Pollution	Contamination of living organisms and food resources	Neither MasOrange nor any member of its value chain is involved in the contamination of living organisms and food resources, as its activities do not involve processes that release chemical contaminants into sensitive ecosystems or affect food production.
E3 Water and marine resources	Water withdrawals	MasOrange's activity does not involve the direct withdrawal of water resources, but is limited to the consumption of water from the public network in the various locations where it has a direct presence, as well as throughout the value chain. Withdrawal is therefore already included in water consumption and discharge.
	Water discharges into the oceans	Neither MasOrange's activity nor that of its value chain members generate direct discharges into the oceans, but rather into the local water resources of the areas where they operate (discharges into the public network and/or rivers).
	Extraction and use of marine resources	Neither MasOrange's activity nor that of its value chain members is related to the extraction and/or use of marine resources.
E4 Biodiversity and ecosystems	Climate change	Neither MasOrange's activity nor that of its value chain members is located in areas of high biological diversity where climate change could drive biodiversity loss due to their activity.
	Land use change, freshwater use change and marine use change	Neither MasOrange's activities nor those of its value chain members have an impact on changes in land use, freshwater use or marine use. The telecommunications industry's activities require network deployment that does not occupy large areas of land and the installation of fibre optics in the oceans does not entail changes in marine or ocean use.
	Invasive alien species	Neither MasOrange nor the members of its value chain work with species whose introduction and/or spread by human action outside their natural habitat could threaten biological diversity, food security and human health and well-being.
	Risk of species extinction on a global scale	Neither MasOrange's activity nor that of the members of its value chain has an impact on local species, and does not represent a risk of extinction for any species on a global scale.
	Incidents affecting ecosystem services and dependencies	Neither MasOrange's activity nor that of the members of its value chain influences the benefits that people obtain from ecosystems.
S1 Own workforce	Adequate housing	MasOrange complies with the Labour Statute and Royal Decree 231/2020 on the minimum interprofessional wage, which must guarantee access to adequate housing.
S4 Consumers and end-users	Freedom of expression	MasOrange's products and services do not affect or influence the freedom of expression of consumers and end-users, nor do they impact the activities of members of its value chain, as its operations are not linked to communication restrictions or practices that in any way limit the free exchange of ideas and views.
G1 Business conduct	Animal welfare	Neither MasOrange's activities nor those of its value chain members harm or influence animal welfare, as their activities are not related to the livestock or pharmaceutical sectors, nor to animals in human care.



Non-material topics

The following impacts, risks and opportunities analysed in relation to the following topics and sub-(sub-)topics described by the ESRS were found to be non-material for the Group:

Topics

E2 Pollution

E3 Water and marine resources

E4 Biodiversity and ecosystems

S3 Affected communities

The environmental topics (E2, E3 and E4) were evaluated but were found to be non-material, given that MasOrange's operations do not have a significant direct impact on pollution, water or biodiversity, compared to their contribution to climate change and the use of resources necessary to do business.

Sub-(sub-)topics

E5 Resource outflows related to products and services

S1 Working time

S1 Social dialogue

S1 Freedom of association, the existence of works councils and the information, consultation and participation rights of workers

S1 Collective bargaining, including the rate of workers covered by collective agreements

S1 Employment and inclusion of persons with disabilities

S1 Measures against violence and harassment in the workplace

S1 Other work-related rights

S4 Health and safety

S4 Responsible marketing practices

G1 Protection of whistleblowers

G1 Political influence and lobbying activities



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

To determine which topics should be considered material and what information should be disclosed about the relevant IROs, MasOrange set a materiality threshold, as described in disclosure requirement IRO-1. Based on this threshold, material topics and associated IROs were identified, assisted by internal stakeholders to ensure the consistency and robustness of the process.

Disclosure requirements met in the Report:

As a result of the above-mentioned process and the material topics for the Group, the table below presents the disclosure requirements met in this Report:

Disclosure requirement		Report section	Pages
General disclosures– ESRS 2			
1. Basis for the general disclosures	General basis for preparation of sustainability statements (BP-1)	Basis for preparation	7
	Disclosures in relation to specific circumstances (BP-2)	Basis for preparation	9
2. Governance	The role of governing bodies (GOV-1)	Governance	11
	Information provided to and sustainability matters addressed by the undertaking's governing bodies (GOV-2)	Governance	17
	Integration of sustainability-related performance in incentive schemes (GOV-3)	Governance	19
	Statement on due diligence (GOV-4)	Governance	20
	Risk management and internal controls over sustainability reporting (GOV-5)	Governance	22
3. Strategy	Strategy, business model and value chain (SBM-1)	Strategy	28
	Interests and views of stakeholders (SBM-2)	Strategy	42
	Material impacts, risks and opportunities and their interaction with strategy and business model(s) (SBM-3)	Strategy	47



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement		Report section	Pages
4. Impact, risk and opportunity management	Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1).	Impact, risk and opportunity management	53
	Disclosure requirements in ESRS covered by the undertaking's sustainability statement (IRO-2)	Impact, risk and opportunity management	60
	Policies adopted to manage material sustainability matters (MDR-P)	Policies, actions, targets and metrics	60
	Actions and resources in relation to material sustainability matters (MDR-A)	Policies, actions, targets and metrics	65
5. Metrics and targets	Metrics in relation to material sustainability matters (MDR-M)	Policies, actions, targets and metrics	64
	Tracking effectiveness of policies and actions through targets (MDR-T)	Policies, actions, targets and metrics	65

Environmental information

European Union Taxonomy

Background	-	European Union Taxonomy	67
Reporting requirements	-	European Union Taxonomy	68
Taxonomy scope	-	European Union Taxonomy	70
Methodology and findings	-	European Union Taxonomy	76

Climate change (E1)

1. Governance	Integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3)	Climate change (ESRS E1)	82
2. Strategy	Climate action plan for climate change mitigation (E1-1)	Climate change (ESRS E1)	86
	Material impacts, risks and opportunities and their interaction with strategy and business model(s) (ESRS SBM-3).	Climate change (ESRS E1)	83



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement		Report section	Pages
3. Impact, risk and opportunity management	Description of the processes to identify and assess climate-related material impacts, risks and opportunities (ESRS 2 IRO-1)	Climate change (ESRS E1)	88
	Policies related to climate change mitigation and adaptation (E1-2)	Climate change (ESRS E1)	94
	Actions and resources in relation to climate change policies (E1-3)	Climate change (ESRS E1)	95
4. Metrics and targets	Targets related to climate change mitigation and adaptation (E1-4)	Climate change (ESRS E1)	97
	Energy consumption and mix (E1-5)	Climate change (ESRS E1)	98
	Gross scopes 1, 2 and 3 and total GHG emissions (E1-6)	Climate change (ESRS E1)	100
	GHG removals and GHG mitigation projects financed through carbon credits (E1-7)	Climate change (ESRS E1)	102
	Internal carbon pricing system (E1-8)	Climate change (ESRS E1)	103
	Potential financial effects from material physical and transition risks and potential climate-related opportunities (E1-9)	Climate change (ESRS E1)	103
Resource use and circular economy (E5)			
1. Impact, risk and opportunity management	Description of the processes to identify and assess material impacts, risks and opportunities related to resource use and circular economy (ESRS 2 IRO-1)	Resource use and circular economy (ESRS E5)	104
	Policies related to resource use and circular economy (E5-1)	Resource use and circular economy (ESRS E5)	105
	Actions and resources related to resource use and circular economy (E5-2)	Resource use and circular economy (ESRS E5)	106



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement		Report section	Pages
2. Metrics and targets	Targets related to resource use and circular economy (E5-3)	Resource use and circular economy (ESRS E5)	109
	Resource inflows (E5-4)	Resource use and circular economy (ESRS E5)	110
	Resource outflows (E5-5)	Resource use and circular economy (ESRS E5)	110
	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities (ESRS 2 E5-6)	Resource use and circular economy (ESRS E5)	112
Social information			
Own workforce (S1)			
1. Strategy	Interests and views of stakeholders (ESRS 2 SBM-2)	Own workforce (ESRS S1)	115
	Material impacts, risks and opportunities and their interaction with strategy and business model(s) (ESRS SBM-3).	Own workforce (ESRS S1)	115
2. Impact, risk and opportunity management	Policies related to own workforce (S1-1)	Own workforce (ESRS S1)	118
	Processes for engaging with own workers and workers' representatives about impacts (S1-2)	Own workforce (ESRS S1)	121
	Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)	Own workforce (ESRS S1)	122
	Actions related to material impacts, risks and opportunities affecting own workers (S1-4)	Own workforce (ESRS S1)	123



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement		Report section	Pages
	Targets related to managing material impacts, risks and opportunities on own workers (S1-5)	Own workforce (ESRS S1)	129
	Characteristics of the undertaking's employees (S1-6)	Own workforce (ESRS S1)	131
	Characteristics of non-employee workers in the undertaking's own workforce (S1-7)	Own workforce (ESRS S1)	135
	Collective bargaining coverage and social dialogue (S1-8)	Own workforce (ESRS S1)	136
	Diversity metrics (S1-9)	Own workforce (ESRS S1)	136
	Adequate wages (S1-10)	Own workforce (ESRS S1)	137
3. Metrics and targets	Social protection (S1-11)	Own workforce (ESRS S1)	137
	Persons with disabilities (S1-12)	Own workforce (ESRS S1)	137
	Training and skills development metrics (S1-13)	Own workforce (ESRS S1)	138
	Health and safety metrics (S1-14)	Own workforce (ESRS S1)	140
	Work-life balance metrics (S1-15)	Own workforce (ESRS S1)	143
	Compensation metrics (pay gap and total compensation) (S1-16)	Own workforce (ESRS S1)	143
	Incidents, complaints and severe human rights impacts (S1-17)	Own workforce (ESRS S1)	146
Workers in the value chain (S2)			
1. Strategy	Interests and views of stakeholders (ESRS 2 SBM-2)	Workers in the value chain (ESRS S2)	147
	Material impacts, risks and opportunities and their interaction with strategy and business model(s) (ESRS SBM-3).	Workers in the value chain (ESRS S2)	148



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement		Report section	Pages
2. Impact, risk and opportunity management	Policies related to value chain workers (S2-1)	Workers in the value chain (ESRS S2)	150
	Processes for engaging with value chain workers about impacts (S2-2)	Workers in the value chain (ESRS S2)	152
	Processes to remediate negative impacts and channels for value chain workers to raise concerns (S2-3)	Workers in the value chain (ESRS S2)	152
	Policies related to value chain workers (S2-4)	Workers in the value chain (ESRS S2)	154
3. Metrics and targets	Targets related to value chain workers (S2-5)	Workers in the value chain (ESRS S2)	156
Consumers and end-users (S4)			
1. Strategy	Interests and views of stakeholders (ESRS 2 SBM-2)	Consumers and end-users (ESRS S4)	160
	Material impacts, risks and opportunities and their interaction with strategy and business model(s) (ESRS SBM-3).	Consumers and end-users (ESRS S4)	161
2. Impact, risk and opportunity management	Policies related to consumers and end-users (S4-1)	Consumers and end-users (ESRS S4)	165
	Processes for engaging with consumers and end-users about impacts (S4-2)	Consumers and end-users (ESRS S4)	167
	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)	Consumers and end-users (ESRS S4)	169
	Actions related to consumers and end-users (S4-4)	Consumers and end-users (ESRS S4)	172
3. Metrics and targets	Targets related to managing material impacts, risks and opportunities on consumers and end-users (S4-5)	Consumers and end-users (ESRS S4)	188
Governance information			
Business conduct (ESRS G1)			
1. Governance	The role of governing bodies (ESRS 2 GOV-1)	Business conduct (ESRS G1)	193

Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement		Report section	Pages
2. Impact, risk and opportunity management	Description of the processes to identify and assess material impacts, risks and opportunities (ESRS 2 IRO-1).	Business conduct (ESRS G1)	194
	Corporate culture and business conduct (G1-1)	Business conduct (ESRS G1)	197
	Management of relationships with suppliers (G1-2)	Business conduct (ESRS G1)	209
	Prevention and detection of corruption or bribery (G1-3)	Business conduct (ESRS G1)	211
3. Metrics and targets	Confirmed incidents of corruption or bribery (G1-4)	Business conduct (ESRS G1)	213
	Payment practices (G1-6)	Business conduct (ESRS G1)	213

The following transitional and non-material requirements have been voluntarily met:

Disclosure requirement	Type
Social protection (S1-11)	Transitional provision
Training and skills development metrics (S1-13)	Transitional provision
Health and safety metrics (S1-14)	Transitional provision
Work-life balance metrics (S1-15)	Transitional provision
Collective bargaining coverage and social dialogue (S1-8)	Non-material
Adequate wages (S1-10)	Non-material
Persons with disabilities (S1-12)	Non-material



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Data points envisaged in other EU legislation

Additionally, there follows a detailed table showing the data points covered by the ESRS that derive from other European Union legislation:

Disclosure requirement and related data point	Reference to the Regulation on the disclosure of sustainability-related information in the financial services sector	Reference to Pillar 3	Reference to the Regulation on benchmarks	Reference to European climate legislation
ESRS 2 GOV-1 Gender diversity on the board of directors, paragraph 21, letter d)	Indicator no. 13 in appendix 1, table 1		Commission Delegated Regulation (EU) 2020/1816 (5), annex II	
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 e)			Commission Delegated Regulation (EU) 2020/1816 (5), annex II	
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Indicator no. 10 in appendix 1, table 3			
ESRS 2 SBM-1 Involvement in activities related to fossil fuels, paragraph 40, letter d), indent i)	Indicator no. 4 in appendix 1, table 1	Article 449a of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453 (6), table 1: Qualitative information on environmental risk and table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, annex II	
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40, letter d), indent ii)	Indicator no. 9 in appendix 1, table 2		Delegated Regulation (EU) 2020/1816, annex II	
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40, letter d), indent iii)	Indicator no. 14 in appendix 1, table 1		Delegated Regulation (EU) 2020/1818 (7), Article 12, paragraph 1 Delegated Regulation (EU) 2020/1816, annex II	
ESRS 2 SBM-1 Involvement in activities related to tobacco cultivation and production, paragraph 40, letter d), indent iv)			Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1 Delegated Regulation (EU) 2020/1816, annex II	



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement and related data point	Reference to the Regulation on the disclosure of sustainability-related information in the financial services sector	Reference to Pillar 3	Reference to the Regulation on benchmarks	Reference to European climate legislation
ESRS E1-1 Transition plan to achieve carbon neutrality by 2050, section 14				Regulation (EU) 2021/1119, Article 2, paragraph 1
ESRS E1-1 Undertakings excluded from Paris-aligned benchmarks, paragraph 16, letter g)		Article 449a of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453 (6), template 1: Banking portfolio – Transition risk linked to climate change: credit quality of exposures by sector, issues and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1, letters d) to g), and Article 12, paragraph 2	
ESRS E1-4 GHG emission reduction targets, paragraph 34	Indicator no. 4 in appendix 1, table 2	Article 449a of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453 (6), template 3: Banking portfolio – Transition risk linked to climate change: harmonisation metrics	Delegated Regulation (EU) 2020/1818, Article 6	
ESRS E1-5 Consumption of energy from non-renewable fossil sources, disaggregated by source (only high-climate-impact sectors), paragraph 38	Indicator no. 5 of table 1 and indicator no. 5 of table 2 in appendix 1			
ESRS E1-5 Energy consumption and mix, paragraph 37	Indicator no. 5 in appendix 1, table 1			
ESRS E1-5 Energy intensity associated with activities in high-climate-impact sectors, paragraphs 40 to 43	Indicator no. 6 in appendix 1, table 1			



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement and related data point	Reference to the Regulation on the disclosure of sustainability-related information in the financial services sector	Reference to Pillar 3	Reference to the Regulation on benchmarks	Reference to European climate legislation
ESRS E1-6 Gross scopes 1, 2 and 3 and total GHG emissions, paragraph 44	Indicators no. 1 and 2 in appendix 1, table 1	Article 449a of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 1: Banking portfolio – Transition risk linked to climate change: credit quality of exposures by sector, issues and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5, paragraph 1 and Articles 6 and 8, paragraph 1	
ESRS E1-6 Intensity of gross GHG emissions, paragraphs 53 to 55	Indicator no. 3 in appendix 1, table 1	Article 449a of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Banking portfolio – Transition risk linked to climate change: harmonisation metrics	Delegated Regulation (EU) 2020/1818, Article 8, paragraph 1	
ESRS E1-7 GHG removals and carbon credits, paragraph 56				Regulation (EU) 2021/1119, Article 2, paragraph 1
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66			Delegated Regulation (EU) 2020/1818, annex II Delegated Regulation (EU) 2020/1816, annex II	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risks, paragraph 66, latter a) ESRS E1-9 Location of significant assets at material physical risk, paragraph 66, letter c).		Article 449a of Regulation (EU) no. 75/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47, template 5 Banking portfolio – Physical risk linked to climate change: exposures subject to physical risk		



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement and related data point	Reference to the Regulation on the disclosure of sustainability-related information in the financial services sector	Reference to Pillar 3	Reference to the Regulation on benchmarks	Reference to European climate legislation
ESRS E1-9 Breakdown of the carrying value of real estate assets by energy efficiency classes, paragraph 67, letter c).		Article 449a of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34, template 2 Banking portfolio – Transition risk linked to climate change: loans secured by real estate collateral – Energy efficiency of collateral		
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Delegated Regulation (EU) 2020/1818, annex II	
ESRS E2-4 Quantity of each pollutant listed in Annex II of the European PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator no. 8 in appendix 1, table 1; indicator no. 2 in appendix 1, table 2; indicator no. 1 in appendix 1, table 2; indicator no. 3 in appendix 1, table 2			
ESRS E3-1 Water and marine resources, paragraph 9	Indicator no. 7 in appendix 1, table 2			
ESRS E3-1 Specific policies, paragraph 13	Indicator no. 8 in appendix 1, table 2			
ESRS E3-1 Sustainable management of oceans and seas, paragraph 14	Indicator no. 12 in appendix 1, table 2			
ESRS E3-4 Total water recycled and reused, paragraph 28, letter c)	Indicator no. 6.2 in appendix 1, table 2			
ESRS E3-4 Total water consumption in own operations in m3 per net revenue, paragraph 28	Indicator no. 6.1 in appendix 1, table 2			
ESRS 2 - SBM-3 - E4 paragraph 16, letter a), indent i)	Indicator no. 7 in appendix 1, table 1			
ESRS 2 - SBM-3 - E4 paragraph 16, letter b)	Indicator no. 10 in appendix 1, table 2			



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement and related data point	Reference to the Regulation on the disclosure of sustainability-related information in the financial services sector	Reference to Pillar 3	Reference to the Regulation on benchmarks	Reference to European climate legislation
ESRS 2 - SBM-3 - E4 paragraph 16, letter c)	Indicator no. 14 in appendix 1, table 2			
ESRS E4-2 Sustainable agricultural or land use practices or policies, paragraph 24, letter b)	Indicator no. 11 in appendix 1, table 2			
ESRS E4-2 Sustainable marine or ocean practices or policies, paragraph 24, letter c)	Indicator no. 12 in appendix 1, table 2			
ESRS E4-2 Policies to address deforestation, paragraph 24, letter d)	Indicator no. 15 in appendix 1, table 2			
ESRS E5-5 Non-recycled waste, paragraph 37, letter d)	Indicator no. 13 in appendix 1, table 2			
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Indicator no. 9 in appendix 1, table 1			
ESRS 2 - SBM3 - S1 Risk of forced labour cases, paragraph 14, letter f)	Indicator no. 13 in appendix 1, table 3			
ESRS 2 - SBM3 - S1 Risk of incidents of forced labour, paragraph 14, letter g)	Indicator no. 12 in appendix 1, table 3			
ESRS S1-1 Human rights policy commitments, paragraph 20	Indicator no. 9 in appendix 1 table 3 and no. 11 of table 1			
ESRS S1-1 Due diligence policies on issues addressed by fundamental International Labour Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, annex II	
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	Indicator no. 11 in appendix 1, table 3			
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	Indicator no. 1 in appendix 1, table 3			
ESRS S1-3 Complaint or grievance management mechanisms, paragraph 32, letter c)	Indicator no. 5 in appendix 1, table 3			



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement and related data point	Reference to the Regulation on the disclosure of sustainability-related information in the financial services sector	Reference to Pillar 3	Reference to the Regulation on benchmarks	Reference to European climate legislation
ESRS S1-14 Number of fatalities and number and rate of work-related accidents	Indicator no. 2 in appendix 1, table 3		Delegated Regulation (EU) 2020/1816, annex II	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness	Indicator no. 3 in appendix 1, table 3			
ESRS S1-16 Unadjusted gender pay gap, paragraph 97, letter a)	Indicator no. 12 in appendix 1, table 1		Delegated Regulation (EU) 2020/1816, annex II	
ESRS S1-16 Excessive CEO pay ratio, paragraph 97, letter b)	Indicator no. 8 in appendix 1, table 3			
ESRS S1-17 Incidents of discrimination, paragraph 103, letter a)	Indicator no. 7 in appendix 1, table 3			
ESRS S1-17 Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 104, letter a)	Indicator no. 10 in appendix 3 table 1 and no. 14 of table 1		Delegated Regulation (EU) 2020/1816, annex II Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1	
ESRS 2 - SBM3 - S2 Significant risk of child labour or forced labour in the value chain, paragraph 11, letter b)	Indicators no. 12 and 13 in appendix 1, table 3			
ESRS S2-1 Human rights policy commitments, paragraph 17	Indicator no. 9 in appendix 1 table 3 and no. 11 of table 1			
ESRS S2-1 Policies related to value chain workers, paragraph 18	Indicators no. 11 and 4 in appendix 1, table 3			
ESRS S1-1 Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 19	Indicator no. 10 in appendix 1, table 1		Delegated Regulation (EU) 2020/1816, annex II Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1	



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement and related data point	Reference to the Regulation on the disclosure of sustainability-related information in the financial services sector	Reference to Pillar 3	Reference to the Regulation on benchmarks	Reference to European climate legislation
ESRS S2-1 Due diligence policies on issues addressed by fundamental International Labour Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, annex II	
ESRS S2-4 Human rights issues and incidents connected to the upstream and downstream value chain, paragraph 36	Indicator no. 14 in appendix 1, table 3			
ESRS S3-1 Human rights policy commitments, paragraph 16	Indicator no. 9 in appendix 1 table 3 and no. 11 of table 1			
ESRS S3-1 Non-compliance with the United Nations Guiding Principles on Business and Human Rights, ILO principles or OECD Guidelines, paragraph 17	Indicator no. 10 in appendix 1, table 1		Delegated Regulation (EU) 2020/1816, annex II Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1	
ESRS S3-4 Human rights issues and incidents, paragraph 36	Indicator no. 14 in appendix 1, table 3			
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Indicator no. 9 in appendix 1 table 3 and no. 11 of table 1			
ESRS S4-1 Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 17	Indicator no. 10 in appendix 1, table 1		Delegated Regulation (EU) 2020/1816, annex II Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1	
ESRS S4-4 Human rights issues and incidents, paragraph 35	Indicator no. 14 in appendix 1, table 3			
ESRS G1-1 United Nations Convention against Corruption, paragraph 10, letter b)	Indicator no. 15 in appendix 1, table 3			
ESRS G1-1 Protection of whistleblowers, paragraph 10, letter d)	Indicator no. 6 in appendix 1, table 3			



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Disclosure requirement and related data point	Reference to the Regulation on the disclosure of sustainability-related information in the financial services sector	Reference to Pillar 3	Reference to the Regulation on benchmarks	Reference to European climate legislation
ESRS G1-4 Fines issued for the violation of anti-corruption and anti-bribery laws, paragraph 24, letter a)	Indicator no. 17 in appendix 1, table 3		Delegated Regulation (EU) 2020/1816, annex II	
ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24, letter b)	Indicator no. 16 in appendix 1, table 3			



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Appendix II. Table of contents Law 11/2018 and ESRS

Information requested by Law 11/2018	Reporting criterion	Location	Page
General disclosures			
Business model			
		General disclosures (ESRS 2)	7 - 65
		Climate change (ESRS E1)	94 - 95; 97
Business context	ESRS 2		
Organisation and structure	ESRS E1-2; E1-4		
Markets in which it operates	ESRS E5-1; E5-3	Resource use and circular economy (ESRS E5)	94 - 106; 109
Objectives and strategies	ESRS S1-1; S1-5	Own workforce (ESRS S1)	118 - 120;
Main factors and trends that may affect future development	ESRS S2-1; S2-5		129 - 130
Main policies applicable to the Group	ESRS S4-1; S4-5	Workers in the value chain (ESRS S2)	150 - 152;
	ESRS G1-1		156 - 158
		Consumers and end-users (ESRS S4)	165 - 167;
			188 - 190
		Business conduct (ESRS G1)	197 - 208
Main risks and impacts identified			
Internal Control and Risk Management System	ESRS 2 GOV 5		22
Analysis of risks and impacts related to key matters	ESRS 2 IRO-1	General disclosures (ESRS 2)	53
	ESRS 2 SBM-3		47
Environmental matters			
On current and foreseeable effects of the undertaking's activities on the environment and, if applicable, on health and safety	ESRS 2 GOV 5		22
	ESRS 2 IRO-1	General disclosures (ESRS 2)	53
	ESRS 2 SBM-3		47
On environmental assessment or certification procedures	ESRS E1-1	Climate change (ESRS E1)	86 - 88
On resources devoted to preventing environmental risks	ESRS E1-3	Climate change (ESRS E1)	95 - 97
	ESRS E1-2	Climate change (ESRS E1)	94 - 95
On the application of the precautionary principle	ESRS E2-1	Contamination (ESRS E2)	Non-material
	ESRS E3-1	Water and marine resources (ESRS E3)	Non-material
	ESRS E5-1	Resource use and circular economy (ESRS E5)	105 - 106



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Information requested by Law 11/2018	Reporting criterion	Location	Page
On the amount of provisions and guarantees for environmental risks	ESRS E1-3; ESRS E1-2 ESRS E3-2 ESRS E5-2	Climate change (ESRS E1)	94 - 95
		Water and marine resources (ESRS E3)	95 - 97
		Resource use and circular economy (ESRS E5)	Non-material 106 - 108
Pollution			
Measures to prevent, reduce or repair emissions that seriously impact the environment, taking into account any form of atmospheric pollution by an activity, including noise and light pollution	Non-material		
Circular economy and waste prevention and management			
Prevention measures, recycling, reuse, other forms of recovery and waste disposal; actions to combat food waste	ESRS E5-2	Resource use and circular economy (ESRS E5)	106 - 108
Sustainable use of resources			
Water consumption and water supply in accordance with local constraints	Non-material		
Consumption of raw materials and measures taken to improve efficiency of use	ESRS E5-4	Resource use and circular economy (ESRS E5)	110
Direct and indirect energy consumption	ESRS E1-5	Climate change (ESRS E1)	98 - 99
Measure taken to improve energy efficiency	ESRS E1-3	Climate change (ESRS E1)	95 - 97
Use of renewable energies	ESRS E1-5	Climate change (ESRS E1)	98 - 99
Climate change			
Significant aspects of the greenhouse gas emissions generated by the undertaking's activities, including the use of the goods and services produced	ESRS E1-4; ESRS E1-6	Climate change (ESRS E1)	97 ; 100 - 102
Measures to adapt to the consequences of climate change	ESRS E1-3	Climate change (ESRS E1)	95 - 97
Medium- and long-term reduction targets set voluntarily to reduce greenhouse gas emissions and the means used to achieve them	ESRS E1-4	Climate change (ESRS E1)	97
Protection of biodiversity			
Measures taken to preserve or restore biodiversity	Non-material		
Impacts of activities or operations on protected areas	Non-material		



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Information requested by Law 11/2018	Reporting criterion	Location	Page
Social and personnel-related matters			
Employment			
Total number and distribution of employees according to criteria representative of diversity (gender, age, country, etc.)	ESRS S1-6	Own workforce (ESRS S1)	131 - 135
Total number and distribution of employment contract types, annual average indefinite contracts, temporary contracts and part-time contracts by gender, age and professional category	ESRS S1-6	Own workforce (ESRS S1)	131 - 136
Number of lay-offs by gender, age and professional category	ESRS S1-6	Own workforce (ESRS S1)	131 - 136
Average compensation and trends by gender, age, professional category or equal value	ESRS S1-16	Own workforce (ESRS S1)	143 - 145
Pay gap, equal pay for equal work or average remuneration	ESRS S1-16	Own workforce (ESRS S1)	143 - 145
Average remuneration of Board directors and managers, including variable remuneration, per diems, indemnities, payments to long-term savings schemes and any other payments, broken down by gender	ESRS S1-16	Own workforce (ESRS S1)	143 - 145
Implementation of right to disconnect policies	ESRS S1-1	Own workforce (ESRS S1)	118 - 120
Employees with disabilities	ESRS S1-12	Own workforce (ESRS S1)	137
Work organisation			
Organisation of working time	ESRS S1-1	Own workforce (ESRS S1)	118 - 120
Number of hours of absenteeism	GRI 403-9	Own workforce (ESRS S1)	140 - 141
Measures to facilitate a work-life balance and encourage the co-responsibility of both parents	ESRS S1-15	Own workforce (ESRS S1)	142
Health and safety			
Occupational health and safety conditions	ESRS S1-11	Own workforce (ESRS S1)	137
Occupational accidents, particularly frequency and severity, and occupational illnesses, broken down by gender	ESRS S1-14	Own workforce (ESRS S1)	140 - 141
Social relationships			
Organisation of social dialogue, including procedures to inform, consult and negotiate with personnel	ESRS S1-2	Own workforce (ESRS S1)	121



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Information requested by Law 11/2018	Reporting criterion	Location	Page
Percentage of employees covered by collective bargaining agreements by country	ESRS S1-8	Own workforce (ESRS S1)	136
Main content of collective bargaining agreements, particularly in relation to occupational health and safety.	ESRS S1-1	Own workforce (ESRS S1)	118 - 120
Mechanisms and procedures in place in the undertaking to promote employee involvement in management, in terms of information, consultation and participation.	ESRS S1-2	Own workforce (ESRS S1)	121
Training			
Training policies implemented	ESRS S1-2	Own workforce (ESRS S1)	121
Total training hours by professional category	ESRS S1-13	Own workforce (ESRS S1)	138 - 139
Universal accessibility for persons with disabilities			
Universal accessibility for persons with disabilities	ESRS S1-12	Own workforce (ESRS S1)	137
Equality			
Measures adopted to promote equal treatment and opportunities for women and men	ESRS S1-4; ESRS S1-9	Own workforce (ESRS S1)	123 - 129; 136 - 137
Equality plans (Chapter III of Organic Law 3/2007 of 22 March on the effective equality of women and men), measures taken to promote employment, sexual and gender harassment protocols, integration and universal accessibility for persons with disabilities	ESRS S1-1; ESRS S1-4; ESRS S1-9; ESRS S1-12	Own workforce (ESRS S1)	118 - 120; 123 - 129; 136 - 137; 137
Policy on all kinds of discrimination and, if applicable, on diversity management	ESRS S1-1	Own workforce (ESRS S1)	118 - 120
Respect for human rights			
Application of due diligence procedures in relation to human rights; prevention of risks of infringement of human rights and, if applicable, measures to mitigate, manage and redress any abuses committed	ESRS 2 GOV 4 ESRS S1-4 ESRS S2-4 ESRS S4-4	General disclosures (ESRS 2) Own workforce (ESRS S1) Workers in the value chain (ESRS S2) Consumers and end-users (ESRS S4)	20 - 21 123 - 129 154 - 156 172 - 187
Reports of human rights violations	ESRS S1-17	Own workforce (ESRS S1)	146



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Information requested by Law 11/2018	Reporting criterion	Location	Page
Promotion and enforcement of the provisions of the fundamental conventions of the International Labour Organisation relating to respect for freedom of association and the right to collective bargaining; elimination of discrimination in employment and occupation; elimination of forced or compulsory labour; effective abolition of child labour	ESRS S1-1 ESRS S2-1	Own workforce (ESRS S1)	118 - 120; 150 - 152
Combating corruption and bribery			
Measures taken to prevent corruption and bribery	ESRS G1-3	Business conduct (ESRS G1)	211 - 212
Measures to combat money laundering	ESRS G1-3	Business conduct (ESRS G1)	211 - 212
Contributions to foundations and non-profit entities	Non-material		
Society			
Undertaking's sustainable development commitments			
The impact of the Company's business on employment and local development	ESRS 2 SBM 3	General disclosures (ESRS 2)	7 - 65
		Own workforce (ESRS S1)	115 - 117
		Consumers and end-users (ESRS S4)	161 - 165
The impact of the Company's business on local populations and on the territory	ESRS 2 SBM 3	General disclosures (ESRS 2)	7 - 65
		Own workforce (ESRS S1)	115 - 117
		Consumers and end-users (ESRS S4)	161 - 165
Relations and modes of dialogue with members of local communities	Criteria of society	Consumers and end-users (ESRS S4)	159 - 190
Associations or sponsorships	Criteria of society	Consumers and end-users (ESRS S4)	187
Subcontracting and suppliers			
Inclusion in the procurement policy of social, gender equality and environmental matters.	ESRS S2-1	Workers in the value chain (ESRS S2)	150 - 152
Consideration of the social and environmental responsibility of suppliers and subcontractors	ESRS S2-2		152;
	ESRS S2-3	Workers in the value chain (ESRS S2)	152 - 153;
	ESRS S2-4		154 - 156
Oversight systems, audits and related findings	ESRS G1-2	Business conduct (ESRS G1)	209 - 210
	ESRS S2-2		152;
	ESRS S2-3	Workers in the value chain (ESRS S2)	152 - 153;
	ESRS S2-4		154 - 156
	ESRS G1-2	Business conduct (ESRS G1)	209 - 210
Consumers			



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Information requested by Law 11/2018	Reporting criterion	Location	Page
Consumer health and safety measures	ESRS S4-1; ESRS S4-4	Consumers and end-users (ESRS S4)	165 - 167; 172 - 187
Complaints systems, complaints received and resolution	ESRS S4-3; ESRS S4-5	Consumers and end-users (ESRS S4)	169 - 172; 188 - 190
Tax information			
Profits obtained, country by country	GRI 207-4	Business conduct (ESRS G1)	204
Income taxes paid	GRI 207-4	Business conduct (ESRS G1)	204
Government grants received	GRI 201-4	Business conduct (ESRS G1)	204
EU Taxonomy			
EU Taxonomy	Own methodology based on compliance with Regulation (EU) 2020/852 ESRS E1	Environmental information	67 - 80

Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------

Appendix III. Certifications



Executive summary

General disclosures

Environmental information

Social information

Information on governance

Appendix



Executive summary

General disclosures

Environmental information

Social information

Information on governance

Appendix





Executive summary

General disclosures

Environmental information

Social information

Information on governance

Appendix



External Assurance



KPMG Auditores, S.L.
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28046 Madrid

Limited Assurance Report Issued by an Assurance Provider
on the Consolidated Non-Financial Information Statement and
Sustainability Reporting of MasOrange, S.L. and subsidiaries
for 2025

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

To the Shareholders of MasOrange, S.L.:

Limited Assurance Conclusion

Pursuant to article 49 of the Spanish Code of Commerce, we have performed a limited assurance review of the Consolidated Non-Financial Information Statement (hereinafter NFIS) of MasOrange, S.L. (hereinafter the Entity) and its subsidiaries (hereinafter the Group) for the year ended 31 December 2025, which forms part of the consolidated Directors' Report of the Group.

The content of the NFIS includes additional information to that required by prevailing mercantile legislation concerning non-financial information, specifically including the sustainability reporting prepared by the Group for the year ended 31 December 2025 (hereinafter the sustainability reporting) in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 as regards corporate sustainability reporting (CSRD). This sustainability reporting has also been subject to limited assurance review.

Based on the procedures conducted and the evidence we have obtained, no issues have come to our attention that would lead us to believe that:

- a) the Group's Non-Financial Information Statement for the year ended 31 December 2025 has not been prepared, in all material respects, in accordance with the contents included in prevailing mercantile legislation and with the European Sustainability Reporting Standards (ESRS) or other criteria in accordance with each subject area in the "Appendix II. Table of contents Law 11/2018 and ESRS" of the aforementioned statement;
- b) the sustainability reporting as a whole has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in the accompanying note "General basis for preparation of sustainability statements (BP-17)", including:
- That the description provided of the process to identify the sustainability reporting included in note "Impact, risk and opportunity management" is consistent with the process in place and that it identifies the material information to be disclosed in accordance with the requirements of the ESRS.
 - Compliance with the ESRS.
 - Compliance of the disclosure requirements, included in subsection "European Union Taxonomy" of the environmental section of the sustainability reporting with article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment

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Eng. Appl. Artif. Intell., 7, 11 (1993), P. 66, Dec. 93, 66-80 (1993), Number 9
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Basis for Conclusion

We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Revised Guidelines 47 and 56 issued by the Spanish Institute of Registered Auditors on assurance engagements on non-financial information and considering the content of the note published by the ICAC on 18 December 2024 (hereinafter generally accepted professional standards).

The procedures applied in a limited assurance engagement are less extensive compared to those required in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the level of assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those standards are described in more detail in the Responsibilities of the assurance provider section of our report.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) of the International Ethics Standards Board for Accountants (IESBA Code of Ethics), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management 1 (ISQM 1), which requires a quality management system to be designed, implemented and operated that includes policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Directors' Responsibilities

The preparation of the NFIS included in the consolidated directors' report of the Group, and the content thereof, is the responsibility of the Directors of MasOrange, S.L. The NFIS has been prepared in accordance with prevailing mercantile legislation and the selected ERSR and other criteria described in accordance with each subject matter in the "Appendix II. Table of contents Law 11/2018 and ERSR" of the aforementioned statement.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the NFIS is free from material misstatement, whether due to fraud or error.

The Directors of MasOrange, S.L. are also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the NFIS was obtained.

In relation to sustainability reporting, the entity's Directors are responsible for developing and implementing a process to identify the information to be included in sustainability reporting in accordance with the CSRD, the ERSR and article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 and for disclosing information about this process in the sustainability disclosures themselves in note "Impact, risk and opportunity management". This responsibility includes:

Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------



3

- Understanding the context in which the Group's business activities and relationships are conducted, and its stakeholders, in relation to the Group's impact on people and the environment.
- Identifying actual and potential impacts (both negative and positive), and any risks and opportunities that might affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing and the cost of capital in the short, medium or long term.
- Evaluating the materiality of the impacts, risks and opportunities identified.
- Making assumptions and estimates that are reasonable in the circumstances.

The Directors are also responsible for the preparation of sustainability reporting, including the information identified by the process, in accordance with the sustainability reporting framework applied, including compliance with the CSRD, compliance with the ESRS and compliance with the disclosure requirements included in subsection "European Union Taxonomy" of the environmental section of the sustainability reporting with article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- Designing, implementing and maintaining such internal control as the Directors determine is relevant to enable the preparation of sustainability reporting that is free from material misstatement, whether due to fraud or error.
- Selecting and applying appropriate methods for sustainability reporting and making assumptions and estimates that are reasonable in the circumstances for specific disclosures.

Inherent Limitations in the Preparation of the Information

In accordance with the ESRS, the entity's Directors are required to prepare prospective information based on assumptions, which are to be included in the sustainability reporting, about events that may occur in the future, as well as possible future actions, if any, that the Group may take. The actual outcome may differ significantly from the estimate, as it refers to the future and future events often do not occur as expected.

In determining sustainability disclosures, an entity's management interprets legal and other terms that are not clearly defined and may be interpreted differently by other people, including the legal conformity of such interpretations, and are therefore subject to uncertainty.

Responsibilities of the Assurance Provider

Our objectives are to plan and perform the assurance engagement in order to obtain limited assurance about whether the NFIS and sustainability reporting is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report containing our conclusions thereon. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we apply our professional judgement and maintain an attitude of professional scepticism throughout the engagement. We also:



4

- Design and implement procedures to assess whether the process for identifying the information to be included in both the NFIS and sustainability reporting is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of material information to be disclosed in accordance with the requirements of the ESRS.
- Apply risk-based procedures, including obtaining an understanding of internal controls relevant to the engagement in order to identify the disclosures in which it is most likely that material misstatements arise, whether due to fraud or error, but not for the purpose of providing a conclusion about the effectiveness of the Group's internal control.
- Design and implement procedures that respond to disclosures in both the NFIS and sustainability reporting in which material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the Work Carried Out

A limited assurance engagement includes performing procedures to obtain evidence to support our conclusions. The nature, timing and extent of the procedures selected depend on professional judgement, including an identification of the disclosures in which material misstatements, whether due to fraud or error, are likely to arise in the NFIS and sustainability reporting.

Our work has consisted of making inquiries of management, as well as of the different units and components of the Group that have participated in the preparation of the NFIS, reviewing the processes for compiling and validating the information presented in the NFIS and sustainability reporting and applying certain analytical procedures and sample review tests, which are described below:

In relation to the NFIS assurance review process:

- Meetings with the Group's personnel to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the NFIS for 2025 based on the materiality analysis performed by the Group and described in section "Impact, risk and opportunity management" considering the content required by prevailing mercantile legislation.
- Analysis of the processes for compiling and validating the data presented in the NFIS for 2025.
- Review of the information related to the risks, policies and management approaches applied in relation to the material aspects presented in the NFIS for 2025.
- Corroboration, through sample testing, of the information relative to the content of the NFIS for 2025 and whether it has been adequately compiled based on data provided by the information sources. En relación con el proceso de verificación de la información sobre sostenibilidad:

In relation to the assurance on sustainability reporting process:

- Making inquiries of Group personnel:



Executive summary	General disclosures	Environmental information	Social information	Information on governance	Appendix
-------------------	---------------------	---------------------------	--------------------	---------------------------	----------



5

- To gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
- To understand the source of information used by management (e.g. stakeholder interaction, business plans and strategy documents); and the review of the Group's internal documentation on its process.
- Gaining, through inquiries with Group personnel, an understanding of the entity's processes for collecting, validating and presenting information relevant to the preparation of its sustainability reporting.
- Assessing the consistency of the evidence obtained from our procedures on the Group-implemented process to determine the information to be included in sustainability reporting with the description of the process included in such disclosures, and assessing whether the Group-implemented process identifies the material information to be disclosed in accordance with the requirements of the ESRS.
- Assessing whether all the information identified in the Group-implemented process to determine the information to be included in sustainability reporting is effectively included.
- Assessing the consistency of the structure and presentation of sustainability reporting with the provisions of the ESRS and the rest of the sustainability reporting framework applied by the Group.
- Conducting inquiries of relevant personnel and analytical procedures on information disclosed in the sustainability reporting, considering information in which material misstatements are likely to arise, whether due to fraud or error.
- Performing, where appropriate, substantive sampling procedures on the information disclosed in the selected sustainability reporting, considering information in which material misstatements are likely to arise, whether due to fraud or error.
- Procuring, where applicable, the reports issued by accredited independent third parties accompanying the consolidated Directors' Report in compliance with EU regulations and, in relation to the information to which they refer and in accordance with generally accepted professional standards, confirming, exclusively, the accreditation of the assurance provider and that the scope of the report issued complies with EU regulations.
- Procuring, where appropriate, the documents containing the information included by reference, the reports issued by auditors or assurance providers of such documents and, in accordance with generally accepted professional standards, confirming, exclusively, that, as regards the document to which the information included by reference, the conditions described in the ESRS for including information by reference in the sustainability reporting are met.
- Procuring a representation letter from the Directors and management regarding the NPTIS and sustainability reporting.

Other Information

The directors of MasOrange, S.L. are responsible for the other information. The other information comprises the consolidated annual accounts and other information included in the consolidated Directors' Report but does not include either the auditor's report on the consolidated annual accounts



6

or the assurance reports issued by accredited independent third parties required by EU law on specific disclosures contained in the sustainability reporting and accompanying the consolidated Directors' Report.

Our assurance report does not cover the other information, and we do not express any assurance conclusions about it.

In connection with our assurance engagement on the sustainability reporting, our responsibility consists of reading the other information identified above and, in doing so, consider whether there is a material inconsistency between the other information and the sustainability reporting or the knowledge we have obtained during the assurance engagement that could be indicative of material misstatements in the sustainability reporting.

KPMG Auditores, S.L.

(Signed on original in Spanish)

Marta Contreras Hernández

