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Sustainability report 2025



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Introduction

About this report

Through this report, Hi3G Denmark ApS (“3”) – including the brands OiSTER and Flexii – seeks to transparently describe its approach to sustainability, reflect on progress, and continuously strengthen its practices in response to stakeholder expectations.

Reporting period

The sustainability report covers the period from 1 January 2025 to 31 December 2025. Significant developments occurring since the previous reporting period are included where relevant.

Reporting scope and assurance

The report covers the activities of 3 Denmark. The company is owned 60% by CK Hutchison Holdings Limited (CKHH) and 40% by Investor AB, Sweden’s largest listed investment company. As part of the CK Hutchison Group Telecom (CKHGT), 3 collaborates

closely with other Group operating companies in markets such as Italy, Austria, Sweden, the UK and Ireland to support the Group’s sustainability agenda. CKHGT has engaged KPMG LLP to perform a limited assurance review of the Group’s Greenhouse Gas (GHG) emissions across Scope 1, 2 and 3, which also includes 3. As the assurance process for 2025 had not been completed at the time of publication of this report, the reported figures may be subject to adjustment should material deviations be identified.

Reporting frameworks

3 applies the same reporting frameworks, methodologies and calculation principles as its majority owner, CKHH. Further information on applied methodologies and emission factors is available in the [reporting criteria 2024](#), published by CKHGT.





3 at a glance

Our history

Since its launch in 2003, 3 has operated with a challenger mindset, questioning established practices and continuously introducing new approaches to mobile connectivity and customer experience in the Danish market. With a strong focus on innovation and customer centric services, the company has continuously challenged established market practices. In 2025, 3 became the second largest telecommunications provider in Denmark, measured in number of customers.

Our purpose

By providing connectivity integrated into everyday life, work and public services, 3 enables participation in the digital economy and supports social and economic development, with more than 1.8 million active customers across Denmark. At the same time, operating critical digital infrastructure places a responsibility on 3 to ensure resilience, security, and long term reliability.

3 has built and operates its own nationwide 4G and 5G mobile network, with more than 99% 5G population coverage. Continuous investment in network modernisation is essential to meet growing demand for mobile data, support increased digitalisation, and ensure a resilient and future ready mobile infrastructure. At the end of 2025, 2,980 network sites were in operation. In line with the industry transition towards advanced network technologies, 3 completed the shutdown of its 3G network by the end of 2025. The modernisation of all existing 3G and 4G sites was completed during mid 2025, and approximately 400 new 4G and 5G sites are planned over the coming years to strengthen coverage and capacity. Together, these investments strengthen

coverage, capacity and reliability for consumers, businesses and public institutions and are intended to meet increasing demand for high speed mobile data and ensure a resilient and future ready network.

3 offers mobile and broadband services to both consumers and businesses, complemented by a range of devices, network equipment and value added services. As Denmark’s only mobile only operator, 3 plays a distinct role in the digital ecosystem, focusing solely on mobile technologies and driving innovation within areas such as IoT and data driven solutions.

Environmental considerations are integrated into both network operations and product offerings, reflecting a focus on resource efficiency across the value chain. Since 2022, 3 has secured Renewable Energy Certificates (RECs) covering annual electricity consumption. The company is also actively working to reduce waste, with a particular focus on waste from electrical and electronic equipment (WEEE), both through customer initiatives such as device trade in programmes and through internal processes for repair, reuse, resale and recycling of network equipment. These efforts contribute to reducing environmental impact while supporting long term operational efficiency.

3 is headquartered in Copenhagen and serves customers through 3.dk, a nationwide retail store network and customer service operations. In addition, 3 owns and operates the telecommunications brands OiSTER and Flexii, which provide mobile and data services through oister.dk and flexii.dk.



"People and leadership are another critical pillar of sustainability."

Message from the CEO



The world of today is one marked by global uncertainty and rapid technological change. More than ever, this calls for robust critical infrastructure that can uphold a digitalized society and economy. As one of the largest telco operators in Denmark, it is our task to provide this infrastructure sustainably. We welcome the expectations of sustainable conduct that society places on us, and every year, we make headway.

In 2025, we achieved a total emission reduction of 8 per cent compared to the previous year, and 59 per cent compared to our 2020 baseline. This reflects continued focus on energy efficiency, smarter network operations, and more sustainable ways of building and running our infrastructure.

People and leadership are another critical pillar of sustainability. Diverse leadership strengthens decision-making, supports a more inclusive workplace, and better reflects the customers and societies we serve. Hence, female representation in senior leadership roles is gradually progressing towards a more balanced leadership structure, reflecting continued focus on this area.

During the year, we also implemented a unified risk management framework across our shared IT and network operations in Scandinavia. This strengthens our ability to manage operational risks, protect data, and ensure stable connectivity for customers, businesses, and public services.

Finally, we continue to leverage innovation and partnerships to deliver impact beyond our own organization. In 2025, collaborations with partners enabled us to support reliable connectivity while also strengthening digital safety for customers and businesses.

Together, these efforts reflect our ambition to contribute positively to society by building digital infrastructure that is sustainable, inclusive, and resilient both today and tomorrow.

Morten Christiansen,
CEO Denmark and Regional CEO Austria,
Denmark, and Sweden



Sustainability governance and reporting

Reporting to the CEO, the senior management of 3 constitutes the company’s highest executive decision making body. Overall responsibility for operational and strategic management rests with upper management, supported by the Governance, Risk and Compliance (GRC) Board, which is composed of executive representatives. This governance structure ensures that sustainability related risks, opportunities and performance are integrated into business decision making and internal control processes.

Sustainability performance-linked appraisal

In 2025, 3 adopted a set of Environmental, Social and Governance (ESG) targets as part of the short term incentive framework, developed at Group level by CKHGT. The targets cover a range of sustainability related focus areas, including implementation of supplier ESG assessments, female representation in leadership roles, employee training hours, scope 1 and 2 Greenhouse Gas (GHG) emissions reductions, and renewable electricity procurement. Linking incentive structures to ESG performance supports accountability and reinforces the integration of sustainability into management objectives.



Stakeholder engagement and materiality

3 recognises ongoing stakeholder engagement as essential to understanding stakeholder expectations, priorities and concerns, and to ensuring that sustainability efforts remain relevant and impactful. Insights from stakeholder dialogue inform both business decisions and sustainability priorities.

In 2025, preparations for expanded sustainability reporting requirements, including the Corporate Sustainability Reporting Directive (CSRD), were also influenced by the EU Omnibus agreement. The resulting two year delay has allowed preparatory activities—such as gap analyses, system support and enhanced stakeholder engagement—to be conducted more comprehensively.

During the year, CKHGT updated its double materiality assessment (DMA). The results of the refreshed 2025 DMA form the basis for identifying material sustainability topics across the Group and are presented in Table 1.

Strategy setting

As part of a Group wide project led by CKHGT, 3 updated its Sustainability Strategy in 2025. The original strategy, launched in 2022, remained broadly relevant; however, changes in the external sustainability landscape, regulatory expectations and internal business priorities made a strategic refresh timely.

The updated strategy strengthens clarity around objectives and introduces additional focus areas, with greater emphasis on the business value of sustainability and enhanced governance and internal controls. It has been aligned more closely with the CKHH Sustainability

Framework and adapted to reflect evolving commercial priorities, including digitalisation and the increasing role of artificial intelligence.

Climate transition has been made a more explicit strategic focus, alongside increased attention to regulatory developments related to sustainability reporting, value chains and due diligence. To support transparency and accountability, the strategy is complemented by supporting documentation, including defined targets, metrics and reporting guidance.

Highlights in 2025

- Updated the Group-wide double materiality assessment (DMA) and integrated results into the ERM framework.
- Refreshed the Sustainability Strategy to reflect regulatory developments, business priorities and investor expectations.
- Introduced ESG-linked short-term incentive targets to strengthen management accountability.
- Strengthened alignment with CKHH sustainability frameworks and internal governance structures.
- Advanced CSRD readiness through structured preparatory activities, including gap analysis and system support.
- Updated the sustainability reporting manual to support consistent and compliant reporting.

Table 1: Materiality results of CKHGTs refreshed DMA 2025

				Double material	Financial material	Impact material
E1 Climate Change	E5 Circular Economy	S1 Own Workforce	S2 Workers in the value chain	S4 Consumers and end-users	G1 Business conduct	
Climate change adaptation	Resource inflows, including resource use	Working conditions	Working conditions	Information-related impacts for consumers and/or end-users	Corporate culture	
Climate change mitigation	Resource outflows related to products and services	Equal treatment and opportunities for all	Other work-related rights	Personal safety of consumers and/or end-users	Management of relationships with suppliers including payment practices	
Energy	Waste			Social inclusion of consumers and/or end-users	Corruption and bribery	



Commitments and external sustainability frameworks

UN Global Compact

Since 2022, 3 has been a participant in the United Nations Global Compact (UNGC) and the Danish UNGC local network. UNGC aims to support business awareness and action towards achieving the UN Sustainable Development Goals (SDGs) by 2030. Through participation in UNGC, 3 aligns its business practices with widely recognised principles on human rights, labour, environment and anti corruption, and contributes to broader international efforts to promote sustainable and responsible business conduct.

Science Based Targets initiative

The Science Based Targets initiative (SBTi) promotes ambitious climate action in the private sector by enabling companies to set GHG emissions reduction targets aligned with climate science and the goals of the Paris Agreement.

As a subsidiary of CKHGT, 3 is covered by CKHGT’s approved science based targets, which include net zero, near term and long term ambitions:

- Overall net zero target: CKHGT commits to achieving net zero GHG emissions across the value chain by 2050.
- Near term targets: CKHGT commits to reducing absolute Scope 1 and 2 GHG emissions by 50% by 2030 from a 2020 base year, and to reducing absolute Scope 3 emissions by 42% over the same period.

- Long term targets: CKHGT commits to reducing absolute Scope 1 and 2 GHG emissions by 90% by 2050 from a 2020 base year, and to reducing absolute Scope 3 emissions by 90% within the same timeframe.

Carbon Disclosure Project

As part of CKHGT, 3 participates in reporting to the Carbon Disclosure Project (CDP). CDP reporting supports structured disclosure of environmental data and enables tracking and benchmarking of environmental performance over time. Participation contributes to transparency and helps address increasing expectations related to climate and environmental impacts from suppliers, customers, partners and other stakeholders.

Highlights in 2025

- Strengthened alignment with recognised international sustainability frameworks through participation in UN Global Compact, SBTi-approved climate targets via CKHGT, and CDP reporting.
- Committed to science-based climate action and transparent environmental disclosure as part of CKHGT’s net-zero pathway and value-chain emissions reduction targets.



Overview of achievements in 2025

This overview shows our key efforts and achievements from 2025, mapped to CKHGT’s updated strategy and material topics. Thereby, ‘Sustainability governance and reporting’ serves as a foundation for long-term success. It also visualises which SDGs relate to the respective area.

Strategic pillar	Material topics	Related SDGs	Efforts	Achievements
Environmental transition and resilience	- Climate change mitigation - Climate change adaptation - Energy management - Circular economy and waste	11 SUSTAINABLE CITIES AND COMMUNITIES 13 CLIMATE ACTION	- Commissioning of 3G completed - Enabling of network efficiency features continued	Total emission reduction of 8 % compared to previous year, and 59 % compared to 2020 baseline.
Workforce capabilities and communities	- Employee satisfaction and wellbeing - Learning and development Diversity and Inclusion	4 QUALITY EDUCATION 5 GENDER EQUALITY 8 DECENT WORK AND ECONOMIC GROWTH	114 participants in our 3Academy - Community engagement through our Coding Class project	Female representation in senior leadership* roles increased from 27% to 29%.
Responsible and resilient business	- Responsible AI - Supply chain responsibility - Data privacy - Cybersecurity - Business continuity and resilience	12 RESPONSIBLE CONSUMPTION AND PRODUCTION 16 PEACE, JUSTICE AND STRONG INSTITUTIONS	- Supplier engagement programme commenced - Mandatory e-learning courses for all employees progressed - Supplier due diligence framework launched - AI Committee set up - Information Security Governance Board established, covering information security and preparedness across the Scandinavian tech organisation	Unified risk management framework across shared IT and network in Scandinavia.
Digital solutions and impact	- Product and service impact - Digital responsibility - Customer responsibility	3 GOOD HEALTH AND WELL-BEING 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 11 SUSTAINABLE CITIES AND COMMUNITIES 13 CLIMATE ACTION	- Advanced connectivity solutions tested and deployed - New use cases for 5G explored - More flexible customer offerings introduced	Leveraged innovation and partnerships in 2025 to enable reliable connectivity and support digital safety for customers and businesses.

*The measured group includes Senior Management and two management levels below.

Environmental transition and resilience

GHG accounting

The information and communications technology (ICT) sector accounts for a growing share of global electricity consumption and Greenhouse Gas (GHG) emissions, driven by increasing digitalisation, data traffic and device usage. As data demand continues to rise across both consumer and business segments, the sector’s environmental footprint is expected to increase further. To take responsibility for its climate impact and respond to stakeholder expectations and regulatory developments, 3 began calculating its GHG emissions in 2018 in accordance with the GHG Protocol. A 2020 base year has been established, and emissions are tracked annually across scope 1, scope 2 and scope 3.

Table 2 illustrates the development of 3’s GHG emissions from the 2020 baseline through 2025.

Table 2: GHG emissions development 2020 – 2025 (tCO2e)

GHG Scope	2020	2021	2022	2023	2024	2025	% vs 2020	% vs 2024
Scope 1	448	266	405	297	239	171	-62%	-29%
Scope 2 - LB	7.940	4.597	6.648	7599	5.147	3.841	-52%	-25%
Scope 2 MB	22.050	18.912	383	971	249	239	-99%	-4%
Scope 3 - Total	48.196	67.480	59.010	42.818	31.237	28.927	-40%	-7%
Scope 1 + 2 + 3	70.693	86.759	59.798	44.087	31.725	29.336	-59%	-8%



GHG reduction strategy

Renewable electricity

The procurement of renewable electricity is a central element of 3’s climate transition strategy. Since 2022, 3 has matched 100% of its annual electricity consumption with Renewable Energy Certificates (RECs) sourced from Danish wind, supporting the reduction of market based scope 2 emissions.

Increasing energy efficiency of the network

During 2025, 3 continued to improve the energy efficiency of its mobile network. A key focus area has been the transition from free cooling to passive cooling solutions across network sites. While free cooling relies on mechanical ventilation to draw in external air, passive cooling primarily uses site design and natural ventilation to minimise the need for mechanical systems. Both approaches reduce electricity consumption and refrigerant use and can extend the operational lifetime of cooling equipment.

The replacement programme remains ongoing, with more than 100 units still requiring conversion. In parallel, 3 has continued to deploy more energy efficient radio equipment and integrated antennas, reducing both transmission and cooling power requirements. Higher capacity, lower energy baseband units optimised for LTE and 5G traffic have been introduced, alongside network configuration improvements such as automated cell sleep modes during periods of low traffic.

Additional measures include the rollout of smaller local network sites and indoor solutions to improve coverage while reducing the load on larger sites, as well as the replacement of legacy cooling systems with high efficiency technologies. These initiatives have been implemented alongside the decommissioning of the 3G network, contributing to overall energy savings across the network.

Supplier engagement and scope 3 emissions
In 2025, 3 increased the use of supplier specific emission factors in its Scope 3 emissions calculations, replacing industry average factors where reliable supplier data was available. This enhances the accuracy and transparency of Scope 3 accounting and provides a more representative view of emissions across the value chain. By basing calculations on supplier specific data, 3 is better positioned to identify emissions hotspots, prioritise engagement efforts and monitor progress over time. This approach supports Scope 3 emissions reductions in line with CKHGT’s 2030 Science Based Targets.

Highlights in 2025

- Reduced total Scope 1, 2 and 3 GHG emissions by 59% compared to the 2020 baseline.
- Maintained 100% renewable electricity coverage through Renewable Energy Certificates for all electricity consumption.
- Improved network energy efficiency through cooling optimisation, energy-efficient equipment deployment and 3G network decommissioning.
- Enhanced Scope 3 emissions accuracy by increasing the use of supplier-specific emission factors across the value chain.



Circularity of devices and network equipment

Device take-back and trade-in

3 aims to reduce the environmental impact associated with devices by enabling reuse, refurbishment and responsible recycling. Since 2020, the company has operated a device trade in programme under the name *Byt til nyt*, allowing customers to return used mobile phones and wearables, such as smartwatches, in exchange for a discount on a new purchase. In 2024, the scope of circular offerings expanded with the launch of *3LikeNew*, enabling customers to purchase refurbished devices.

3 has partnered with Foxway for the handling, refurbishment and recycling of returned devices. Foxway provides detailed reporting on the treatment and final outcome of collected equipment. The breakdown of outcomes for returned mobile devices and wearables in 2025 is presented in Table 3.

Extending device lifecycles through insurance solutions

In 2025, 3 launched a new mobile insurance offer, *3Mobiltforsikring*, in collaboration with Tryg. The insurance is designed to support extended device lifecycles by offering coverage that follows the SIM card rather than a specific device. This includes coverage of used phones and tablets, enabling continued use of existing equipment without loss of insurance protection.

The insurance allows customers to choose between repair or replacement in the event of damage, offers unlimited claims, and includes optional theft protection. By enabling flexibility across devices and supporting repair as an alternative to replacement, the solution helps reduce premature device turnover and supports more circular consumption patterns.

Circular ownership models

Through the *3LikeNew* programme, 3 offers refurbished mobile phones to both private and business customers. Refurbished devices are supplied by Foxway, which also processes devices returned through the trade in programme. All refurbished phones are provided with warranties and classified as Grade B, meaning they may have minor cosmetic imperfections while retaining at least 80% of original battery capacity. The programme supports device reuse and provides an alternative to new device purchases.

Eco-design

3 continues to expand the availability of accessories designed with circularity considerations in mind, including products made from recycled materials. In 2025, this included the introduction of mobile accessories produced using recycled plastics, such as the PanzerGlass Matrix screen protection for the Samsung S24 series, which is made from 100% recycled plastic.

Table 3: Outcome of returned devices, 2025

	Received	Reused	Reused (%)	Recycled	Recycled (%)
Mobile Devices					
Mobiles	4008	3954	96.7	54	1.3
Tablets	129	124	96.1	5	3.9
Wearables					
Smartwatch	28	25	89.3	3	10.7
Consumer Electronics					
Dongles	375	349	93.1	26	6.9
Electronics	59	4	6.8	5.5	93.2

Highlights in 2025

- Expanded circular device offerings via refurbished phones, supported by warranties and quality standards.
- Enabled longer device lifecycles through SIM-based insurance solutions supporting repair, reuse and reduced premature replacement.
- Strengthened circular value-chain practices through structured refurbishment, recycling and reporting in partnership with Foxway.
- Integrated eco-design considerations into the product portfolio by introducing accessories made from recycled materials.



Workforce capabilities and communities

Talent attraction and retention

3 aims to attract and retain a diverse workforce by fostering inclusive workplaces that value different perspectives, backgrounds, and experience. This ambition is supported by an open feedback culture and by providing learning and development opportunities that enable employees to build skills, progress professionally, and adapt to changing business needs.

Employee engagement and feedback

Employee engagement is supported through regular and structured dialogue across the organization. In 2025, 3 continued its quarterly employee satisfaction surveys, complemented by targeted feedback sessions and workshops to address areas identified for improvement. Ongoing engagement is further supported through staff briefings, employee forums and resource groups, as well as other internal communication channels that encourage participation and knowledge sharing.

As part of its efforts to support early career development, 3 was nominated for Apprenticeship of the Year by Roskilde Technical School in 2025, recognising the company's engagement in vocational education and training.





Promoting workplace diversity and inclusion

3 seeks to provide a respectful and inclusive working environment with equal opportunities for all employees. Expectations for responsible behaviour are clearly communicated through the Code of Conduct and mandatory conduct training for new employees, with regular refresher courses. The Code of Conduct includes principles related to equal opportunity and diversity and inclusion, aimed at preventing discrimination and fostering fair and respectful workplaces.

These commitments are supported by relevant policies, procedures and business unit practices, including recruitment, talent development and performance management processes.

Gender equality

To support progress towards gender balance, 3 has implemented action plans addressing policies, targeted communication and recruitment practices designed to reduce bias. Leadership development programmes are in place to support the progression of women into leadership roles.

Shortlists for leadership positions are required to include candidates from the underrepresented gender, and parental leave schemes are offered to support a more balanced distribution of caregiving responsibilities. In 2025, 3 adopted a new Gender Balance and Diversity Policy and updated both the Code of Conduct and the Whistleblower Policy to further strengthen its approach to gender equality. Awareness raising initiatives include mandatory unconscious bias training for leaders and recruitment panels.

In 2025, 3 introduced ESG linked bonus metrics to strengthen accountability for sustainability performance, including a target on gender balance in management. The target applies to Senior Management and two management levels below, where female representation increased from 27% in 2024 to 29% in 2025, reflecting a gradual progression towards a more balanced leadership structure.

Employee capabilities

Investing in leaders

3 invests in the development of current and future leaders through structured talent and leadership programmes. These initiatives include targeted leadership training for assistant store managers, supporting succession planning for store management roles and strengthening leadership capabilities across the organisation.

Sustainability training and engagement

In 2025, 3 launched a mandatory, annual ESG training course for all employees. The course forms part of a broader online learning programme and is designed to build company wide awareness and understanding of sustainability, ethical conduct and ESG priorities. The initiative supports consistent knowledge levels across the organisation and reinforces employee engagement with 3’s sustainability ambitions.



Being future-ready

3Academy



Kimmie Frandsen
Solutions Coordinator

Kimmie Frandsen joined 3 in January 2024, starting in Customer Service as a Customer Advisor. She quickly stepped into a trainee role in Customer Service Support, where she gained insight into key processes and contributed to optimising them. This experience led her to her current role in Solutions, where she works with customer complaints and data protection.

Since joining 3, Kimmie has combined hands-on experience with learning through 3Academy, completing courses in coaching, communication, social media, and project management. She uses these skills daily in customer dialogue and collaboration with colleagues.

What motivates Kimmie most is making a difference and helping others. She values the strong sense of community at 3 and the opportunity to grow while taking on responsibility.

“The opportunity to grow through practice and learning has meant that I don’t have to follow a traditional path to develop my career.”



Carla Marie Hansen
Channel Operations Supporter

Carla Marie Hansen started her journey at 3 as a sabbatical job in Customer Service in August 2023. But it didn’t take long before she saw new possibilities. Watching colleagues move across the organisation inspired her to explore her own path – and in March 2025, she stepped into a role as Retail Coordinator. Today, she works as a Channel Operations Supporter, supporting operations across multiple sales channels.

Carla thrives in a role where no two days are the same. She enjoys being in close dialogue with different teams and helping solve complex challenges that make a difference for her colleagues. Alongside her work, she is studying through 3Academy, where she finds it especially motivating to apply theory directly to real-life cases from her everyday work.

“3 is a place where you are seen, heard, and given the opportunity to grow.”



Mahamed Hayle Hassan
*Sales Manager,
3Butikken Østerbrogade*

Mahamed Hayle Hassan joined 3 in 2021 as a Retail Sales Consultant. Since then, he has steadily built his skills and taken on more responsibility along the way. Today, he works as Sales Manager. Alongside his role, he is studying Sales and Marketing through 3Academy in collaboration with Copenhagen Business Academy.

For Mahamed, the combination of theory and practice is key. The programme has strengthened his ability to work in a more structured and data-driven way, enabling him to make better and more informed decisions. It has also given him a stronger understanding of how strategy is translated into concrete sales results and long-term value.

In his daily work, Mahamed uses tools from his studies to analyse performance, set clear goals, and develop his team’s sales approach. What motivates him most is helping his team succeed and working towards shared goals.

“3 is an ambitious and competitive company that knows how to bring out the best in its people.”



Supporting communities

Coding Class

To strengthen fraud awareness and innovation, 3 participated in a customer engagement initiative called Coding Class, which is a course for primary school children. Coding class has the overall goal of introducing coding and technology creation to children in the 6th grade. Two different groups of 6th graders are paired up with a company, which provides the students with a technical case. In 2025 the case focused on solving tele-fraud.

The course involves two 6th-grade classes, with approximately 60 students in total.

Highlights in 2025

- Maintained high employee engagement via regular satisfaction surveys, structured feedback processes and ongoing internal dialogue.
- Supported early-career development, recognised through nomination for Apprenticeship of the Year in 2025.
- Reinforced diversity and inclusion through updated policies, mandatory conduct and bias training, and fair recruitment practices.
- Increased female representation within Senior Management and two management levels below, from 27% in 2024 to 29% in 2025
- Invested in people leadership capabilities via targeted training for assistant store managers.
- Built organisation-wide sustainability awareness through the launch of a mandatory annual ESG training course for all employees.



Responsible and resilient business

Data governance and policies

Data ethics and -privacy

3’s Data Ethics Policy establishes principles and governance frameworks for the responsible, transparent and lawful use of data across the organisation. The policy applies to all employees and business units and is rooted in principles such as data minimisation, non discrimination, transparency, security and respect for human rights. Data ethical considerations are integrated into decision making related to new technologies, systems and partnerships, supported by clearly defined roles, oversight mechanisms and whistleblowing arrangements.

3 maintains a structured approach to data privacy, supported by policies governing the responsible treatment of personal data relating to customers, partners and employees. Personal data is processed only for defined and legitimate purposes, based on appropriate legal grounds, and limited to what is necessary. Clear roles and governance structures are in place, with oversight from the Governance, Risk & Compliance function and a designated Data Protection Officer. Requirements for data minimisation, retention, security and documentation are embedded in processes, alongside the application of privacy by design and default principles. Individuals’ rights, including access, correction and deletion, are respected, and procedures are in place for managing data breaches, risk assessments and third party data processing.

Regular training and awareness

3 applies an embedded and continuous approach to data privacy awareness. In addition to a monthly compliance newsletter, employees have direct access to privacy guidance from a dedicated Data Privacy and AI specialist. This is supported by quarterly meetings with compliance ambassadors, ad hoc training tailored to specific functions or risk areas, and ongoing dialogue through internal collaboration platforms. This model promotes the integration of privacy considerations into everyday decision-making, supported by periodic initiatives, including mandatory annual AI training.

Responsible use of AI

AI governance and policies

3 applies the Group Policy on Responsible and Ethical Use of AI, supplemented by local procedures governing the development, procurement and use of AI systems. An internal AI Committee reviews and approves AI use cases and oversees compliance with ethical principles and applicable regulations, including the EU AI Act. Key elements of the framework include human oversight, transparency, risk assessment and the ability for human intervention.

AI training and employee involvement

To support responsible AI adoption, 3 has established an AI Champions programme, providing specialised training to selected employees across business areas. This enables informed exploration of AI opportunities while maintaining a strong focus on ethical and compliant use. Employees are actively involved in shaping both value creating and responsible AI practices. An employee driven AI Taskforce facilitates knowledge sharing, identifies relevant use cases and promotes ethical application of AI throughout the organisation. This is complemented by a network of compliance ambassadors who strengthen local awareness of AI related compliance and data ethics and act as a link between business units and the Governance, Risk and Compliance (GRC) function.



Sustainable procurement and social supplier standards

With more than 800 local and international suppliers, 3 works systematically to ensure that suppliers meet appropriate social, ethical and governance standards. Supplier management includes screening procedures, defined requirements and ongoing risk based engagement. As a participant in the UNGC, 3 aligns its approach with internationally recognised standards on anti corruption, anti bribery and responsible business conduct. Policies, procedures and awareness initiatives are continuously reviewed and strengthened, particularly for high risk functions and supplier categories.

Supplier Due diligence

In 2025, 3 developed and launched a standardised ESG assessment for suppliers to strengthen transparency and governance across the value chain. The assessment applies a risk-based approach, categorizing suppliers based on their responses. Results are documented in the company’s compliance tool, providing a structured overview of supplier ESG risks and performance.

This enables consistent reporting, targeted follow up and data driven analysis to support responsible supplier management over time.

Highlights in 2025

- Strengthened data privacy and AI governance through clear policies, oversight structures and continuous employee engagement.
- Embedded responsible AI practices via structured governance, training programmes and employee-driven taskforces.
- Enhanced supplier oversight through more stringent, risk-based ESG assessments and categorisation.
- Increased engagement with key suppliers to improve Scope 3 emissions data quality using supplier-specific emission factors.





Cyber- and information security

Cyber security governance

As a provider of critical digital infrastructure, 3 operates in a regulatory environment with increasing requirements related to cyber security, resilience and service continuity. The company therefore continues to strengthen its cyber and information security governance to ensure robust protection of systems, data and services, while maintaining compliance with evolving legislation and regulatory frameworks.

Cyber security risk management frameworks and standards

In 2025, Tre Sverige and 3 initiated an ISO 27001 certification project for 3Kontakt, a cloud based business communication and call management solution for business customers. The project includes the establishment of an information security management system in line with the ISO27001 standard, as well as company wide processes and procedures for information security management, strengthening systematic and structured risk management, documentation and internal controls in line with recognised international standards.

Strengthening cyber security resilience

In line with other Group operating companies, 3 established a local Security Operations Centre (SOC) to support continuous, real time monitoring and response. The SOC uses advanced analytics and automation to detect and respond to cyber threats across systems and networks.

Cyber security capabilities were further strengthened through enhanced operational controls and stricter management of access to critical systems, including the introduction of a new tool for managing privileged user access. Annual security reviews across key risk areas were conducted, complemented by ongoing vulnerability assessments. In parallel, the rollout of a new customer management system is expected to further strengthen the protection of customer information.

Managing third-party cyber security risk

To manage cyber security risks in the supply chain, 3 has established a structured supplier assessment process supported by internal risk evaluations. Information security requirements are embedded in contracts to ensure consistent standards across third-party suppliers and partners.

Employee training and awareness

3 continued its cyber security awareness programme for all employees, with a focus on privacy, information security, artificial intelligence and IT security. Training was supported by ongoing awareness initiatives, including phishing simulations, aimed at strengthening employee resilience and the organisation’s overall security culture. As part of Cyber Security Awareness Month, 3 published a practical cybersecurity guide for business customers, with a particular focus on small and medium sized enterprises. The guide addresses common digital threats and provides concrete, actionable advice to support data protection, operational continuity and a resilient security culture. In collaboration with Tryg, 3 also developed a set of practical recommendations covering areas such as data backups, access controls, employee training and incident response planning.

Responding to data breaches and cyber attacks

3 has strengthened processes and controls to detect, respond to and recover from data breaches and cyber-attacks. These include endpoint detection and response tools, data backup and recovery strategies, and defined incident response plans. During 2025, monitoring and detection capabilities were further enhanced, supported by local procedures enabling engagement of external specialists and intelligence sharing. Additional enhancements are planned to improve analytical capabilities, escalation processes and overall operational readiness to respond effectively to emerging cyber threats.

Highlights in 2025

- Strengthened cyber security governance and resilience through enhanced monitoring, access controls and incident response capabilities.
- Advanced information security management through initiation of ISO 27001 certification for a core business communication platform.
- Improved third-party cyber security risk management through standardised supplier assessments and contractual controls.
- Supported customer and employee cyber resilience through awareness initiatives, practical guidance and targeted engagement activities.
- Evolved the information security strategy to align with emerging regulatory requirements, including NIS2 and the EU AI Act.



Ethical operations

Anti-corruption and bribery

Aligned with CK Hutchison Holdings Limited (CKHH), 3 applies a zero tolerance approach to fraud, bribery and corruption. This commitment is grounded in compliance with applicable laws and regulations, sound governance practices and a strong focus on business integrity. To support this approach, 3 has implemented mandatory training, due diligence processes and a whistleblowing mechanism. During 2025, 3 was subject to an audit by its minority owner focusing on anti bribery and anti corruption controls.

Whistleblowing

3 maintains a confidential whistleblowing system that enables employees and external stakeholders, including customers, suppliers and creditors, to report suspected misconduct or malpractice. The reporting channel are accessible via 3’s website and dedicated reporting portals, supporting early detection, transparency and appropriate follow up.

Business continuity planning

Integrated operational resilience

3 maintains an integrated operational resilience framework supported by business continuity, contingency and crisis management processes. The framework is based on business impact analyses and mapping of critical processes and dependencies to assess potential impacts, define recovery requirements and improve preparedness for key risk scenarios. Responsibility for IT systems and disaster recovery is anchored within the technical organisation, ensuring alignment between operational needs, recovery capabilities and resilience planning.

Highlights in 2025

- Maintained a zero-tolerance approach to bribery and corruption, supported by mandatory training, due diligence processes and oversight mechanisms.
- Strengthened transparency and integrity through a confidential whistleblowing system accessible to employees and external stakeholders.
- Reinforced operational resilience through an integrated business continuity framework covering critical processes, dependencies and recovery planning.
- Completed an anti-bribery and corruption audit conducted by the minority owner during 2025.



Digital solutions and impact

Connectivity and digital solutions

Innovation is a key enabler of how 3 develops and applies new technologies, partnerships and solutions to meet evolving customer needs and operational requirements. In 2025, innovation efforts focused on testing and deploying advanced connectivity solutions, exploring new 5G use cases, and introducing more flexible and scalable offerings. The examples below illustrate how innovation is applied across network infrastructure, partnerships and services.

5G connectivity in geographically challenging areas
In 2025, 3 deployed enhanced 5G connectivity solutions on selected Danish islands, leveraging 5G millimetre wave (mmWave) technology to deliver high speed and stable connectivity in geographically challenging environments. The pilot demonstrated how next generation mobile

infrastructure can support both local communities and tourism, while reducing the need for expansion of fixed infrastructure.

5G-enabled live broadcasting with TV 2
3 continued its collaboration with TV 2 to enable live broadcasting over 5G. Multiple pilots, including large scale events and live productions, used 5G Standalone and high capacity spectrum solutions to deliver reliable, low latency video transmission. The initiatives demonstrate how mobile networks can support professional grade media production and reduce reliance on traditional satellite and fibre based solutions.

Dedicated 5G Standalone pilots in high-density environments
Innovation was further explored through dedicated 5G Standalone network configurations, including pilots in Tivoli. Localised network setups were tested to ensure guaranteed performance and secure connectivity in high density environments. The pilots highlight the potential of tailored 5G networks to support applications requiring high reliability and predictable quality of service.



Digital responsibility

Products and services for digital safety and security

Device insurance supporting extended use

In 2025, 3 partnered with Tryg to launch a new mobile insurance product, *3Mobile Insurance*, replacing the previous *3Insurance* offering. Unlike the former device specific model, the new insurance follows the SIM card and therefore covers the mobile phone or tablet in which the SIM is inserted, including used devices. This allows customers to switch devices or continue using older equipment without losing coverage.

The insurance offers repair or replacement in the event of damage, unlimited claims and optional theft protection. By supporting flexibility across devices and enabling repair rather than replacement, the solution contributes to extended device lifecycles and more sustainable consumption patterns.

Strengthening cyber security for businesses

As cyber threats facing Danish businesses continue to increase, 3 Denmark established a strategic partnership with Arctic Wolf, a global cyber security provider. The partnership provides business customers with access to services such as Managed Detection and Response (MDR), AI based monitoring, cyber threat intelligence and a dedicated Security Operations Centre (SOC), complemented by security awareness training and advisory services.

Together, these solutions support early threat detection, strengthen protection of digital and cloud based infrastructures, and help businesses operate securely in hybrid and remote working environments.

mmWave FWA Evaluation and Deployment Plan

In connection with licence requirements for the 26 GHz band, additional tests were conducted to evaluate the potential of a mmWave based FWA product that could be used as either a fibre backup solution or a broadband offload option, primarily for customers using the C band. The tests showed that device availability remains limited, although increasing. When devices are available and deployed, good throughput is achieved; however, performance depends on clear line of sight between endpoints, as even minor obstructions such as trees or bushes can block the signal. Licence requirements mandate deployment of 100 locations by May 2027. Ericsson has been selected as supplier, and planning has commenced. Approximately 75% of the locations are planned for deployment in 2026, with the remaining sites scheduled for spring 2027.





Digital safety of customers and communities

As a provider of everyday digital connectivity used by families, children and communities, 3 has a responsibility not only to enable access, but also to contribute to healthy and responsible technology use.

Digital habits and their impact on social interaction

A nationwide survey conducted by YouGov on behalf of 3 highlights growing concerns about how mobile phone use affects every day social interactions. More than eight in ten respondents report that mobile phones disrupt presence and attention during conversations, meals and shared moments with family and friends. While mobile devices remain an integral part of daily life, the findings underline increasing awareness of the importance of conscious and responsible technology use to support digital well being and meaningful social interaction. The findings are used as a basis for public dialogue and awareness raising initiatives on digital presence and digital wellbeing, contributing to broader reflection on how technology is used in everyday social interactions¹.

Industry collaboration on children's digital well being

In 2025, a broad alliance of public authorities, civil society organisations and industry actors, including Danish telecommunications providers such as 3, entered into a national agreement to strengthen digital safety for children and young people. The initiative aims to better equip parents with guidance when children receive their first digital device, including information on age appropriate devices, settings and alternatives to smartphones. Through participation in the agreement,

3 supports parents directly at the point of purchase by providing guidance on age appropriate devices, alternatives to smartphones and safe device setup².

Digital inclusion and access

In 2025, 3 received the Best Social Media Experience award at the Danish Digital Awards for its Tour de Dækning TikTok campaign. The initiative actively involved users in testing mobile coverage across Denmark by inviting them to suggest locations, fostering dialogue, transparency and trust. The campaign contributed to increased engagement, improved brand perception and stronger awareness of 3's 5G coverage, particularly among younger audiences.

Highlights in 2025

- Delivered advanced 5G connectivity solutions in remote, high-density and complex environments through targeted pilots and deployments.
- Validated 5G Standalone and mmWave capabilities for low-latency, professional-grade media production and critical connectivity use cases.
- Strengthened cyber resilience for business customers through managed detection, continuous monitoring and expert advisory services.
- Advanced digital well-being and inclusion through national collaboration, research-based insights and awareness initiatives.



1. YouGov survey commissioned by 3, 2025

2. Danish Ministry of Digitalisation, 2025

