



Sustainability Statement

General information

Basis for preparation

This Sustainability Statement covers the financial year from 1 January 2025 to 31 December 2025, and is prepared on a consolidated basis for Odido Netherlands Holding B.V. The reporting boundary is consistent with that applied in the consolidated financial statements (see page 101). A detailed overview of the entities included in the consolidation scope is provided on page 109.

The content of this Sustainability Statement is informed by a materiality analysis, which identifies the sustainability topics that are most relevant to Odido's business model and its key stakeholders. This analysis guides both the selection of disclosed topics and the depth of related disclosures.

For climate-related information, greenhouse gas (GHG) emissions are calculated in accordance with the Greenhouse Gas Protocol. Emissions reduction targets are defined with reference to the Science Based Targets initiative (SBTi) framework. In addition, selected metrics from the Sustainability Accounting Standards Board (SASB) Telecommunications Services Standards, including those related to data privacy and data security, have been applied to enhance sector relevance and comparability within the telecommunications industry.

To support trend analysis, we primarily present performance data for 2025, with 2024 included as a comparative period. The availability of historical data varies by topic and reflects the evolving nature of internal data collection processes.

The Sustainability Statement focuses primarily on Odido's own operations. Coverage of upstream and downstream value-chain activities is included on a limited and topic-specific basis. The extent of value-chain disclosure depends on data availability and Odido's ability to obtain reliable and verifiable information from suppliers, partners, and other third parties. As data quality and systems continue to develop, Odido expects the scope and depth of value-chain reporting to expand over time.

Sustainability impacts, risks, and opportunities are assessed across three strategic time horizons, which are applied consistently throughout this report:

- **Short term:** the current reporting period (2025)
- **Medium term:** a three-year outlook
- **Long term:** a five-year strategic horizon

These time horizons are intended to support an integrated view of near-term performance, emerging trends, and longer-term strategic considerations, while recognizing the inherent uncertainty associated with forward-looking assessments.



Transition towards more structured sustainability reporting

This Sustainability Statement reflects Odido's current stage of development in sustainability reporting and its ongoing transition towards more structured and comprehensive disclosures.

Odido continues to advance its alignment with the European Sustainability Reporting Standards (ESRS) in preparation for the Corporate Sustainability Reporting Directive (CSRD). Although Odido is currently not within the scope of the CSRD, Odido has elected to voluntarily disclose selected metrics that are expected to be required under ESRS. While full ESRS compliance has not yet been achieved, Odido has proactively incorporated selected ESRS disclosure requirements and relevant international standards into its reporting framework to enhance transparency, internal consistency, and year-on-year comparability.

Given the evolving EU sustainability reporting landscape — including ongoing regulatory developments such as the Omnibus proposals, the continued refinement of ESRS requirements, and the fact that the CSRD has not yet been transposed into Dutch law — Odido does not currently claim full compliance with ESRS. The disclosures included in this report have therefore been prepared taking into account relevant ESRS guidance and will continue to evolve as the regulatory framework becomes finalised and applicable.

Unless otherwise indicated, disclosures provided on a voluntary basis have not been subject to external assurance. The only disclosures subject to limited assurance by our external auditor are Odido's Scope 1, Scope 2 and Scope 3 emissions (see page 60-62) and selected own workforce metrics on pages 79-82, with the exception of the metric on the percentage of employees covered by the Health & Safety Management System (HSMS).

The scope, depth and maturity of disclosures vary by topic and depend on factors such as data availability, methodological development, value-chain transparency and the degree of integration of sustainability considerations into internal systems and processes. As a result, not all topics include the same level of detail, quantification or forward-looking analysis.

In this context, Odido has prioritised the disclosure of material sustainability-related topics, existing policies and governance arrangements, actions implemented during the reporting period, and selected metrics and targets where these are currently available and reliable.

Where limitations exist, these are explained within the relevant sections of the Sustainability Statement.

Odido intends to continue strengthening its sustainability reporting in future reporting periods as part of its preparation for forthcoming regulatory requirements, including the Corporate Sustainability Reporting Directive (CSRD). This development will be informed by evolving regulatory guidance, stakeholder expectations and internal progress in data quality, systems and controls.

Changes in the preparation and presentation of sustainability information

During the 2025 reporting period, Odido continued to develop its sustainability reporting practices and enhance compliance as part of its transition towards more structured and comprehensive disclosures. As a result, selected changes were made to the preparation and presentation of sustainability information compared with previous years. These changes reflect improvements in data availability, methodology and internal processes rather than corrections of previously reported information.

Key developments include refinements in the calculation of greenhouse gas emissions, in particular for Scope 3, following the increased use of supplier-reported data (see page 60), the expansion of disclosures related to circular economy and resource use (see page 64), and the further development of supplier and human rights due diligence in the value chain (see page 44). In addition, the structure of the Sustainability Statement has been updated to provide clearer links between material topics, governance, actions, metrics and targets.

Limited Assurance Review

KPMG Accountants N.V. has performed a limited assurance review on selected sustainability information, specifically our 2025 GHG emissions and own workforce metrics with the exception of the metrics on the percentage of employees covered by the HSMS, number of fatalities resulting from work-related accidents or work-related ill health, number of days lost due to recordable work-related accidents or work-related ill health, number of cases of recordable work-related ill health. For further information, please refer to page 196.

Governance

The role of the Executive Board and Supervisory Board in relation to sustainability

We embed sustainability governance within Odido's overall governance framework to support long-term value creation and oversight of sustainability-related impacts, risks, and opportunities alongside financial performance. Responsibility for sustainability rests with the administrative, management and supervisory bodies, which provide strategic direction and oversee the integration of sustainability considerations into the Group's overall governance framework.

Strategic oversight of sustainability matters is exercised through the ESG Committee, chaired by the statutory ESG owner, the Chief Executive Officer (CEO). The Committee includes the Chief Financial Officer (CFO) and other members of the Executive Committee and is responsible for overseeing the development and implementation of the Company's ESG strategy, including the establishment and monitoring of ESG targets and performance. Day-to-day coordination of sustainability activities is delegated to the Chief Legal and Corporate Affairs Officer (CLCO). The ESG Committee meets quarterly with the full Executive Committee to review progress and ensure alignment with the Company's overall strategy. The ESG Working Group, led by the ESG Lead, supports the ESG Committee and is responsible for the operational implementation of the ESG strategy.



Further information on the composition of the Executive Board and Supervisory Board, including the proportion of independent members, gender composition, and other diversity considerations, is provided in the [Corporate Governance](#) section of the Management Board report (see page 34-39).

We seek to ensure that appropriate skills and expertise are available, or can be developed, to manage and oversee sustainability-related matters. This is supported through executive involvement, regular engagement on sustainability topics, and access to internal and external expertise where required.

The administrative, management, and supervisory bodies are increasingly incorporating sustainability-related impacts, risks, and opportunities (IRO) into their governance and oversight processes. As the identification of material IROs continues to evolve, sustainability considerations are regularly discussed at governance level, with approaches to assessing trade-offs developing progressively.

Integration of sustainability-related performance in incentive schemes

The variable remuneration of the Chief Financial Officer (CFO) includes an environment-related performance target. No other members of the administrative, management or supervisory bodies had sustainability-linked incentive components in their remuneration arrangements.

Due diligence

During the reporting period, we carried out a comprehensive assessment of human rights and environmental risks across our value chain. This assessment aimed to strengthen our existing due diligence approach by deepening our understanding of salient sustainability risks, supporting the identification and mitigation of potential adverse impacts, and further developing our risk management capabilities.

The risk assessment was conducted in alignment with the Corporate Sustainability Due Diligence Directive (CSDDD) and the OECD Guidelines for Multinational Enterprises, with external expertise provided through consultancy support and structured workshops. The assessment identified salient risks that occur predominantly at early stages of the value chain, where Odido is directly linked to potential impacts through business relationships rather than being the direct cause.

The assessment identified several salient human rights risks, mainly related to working conditions, child labour, and forced labour in raw material extraction and manufacturing of electronic components, as well as health and safety risks associated with inbound transportation. Climate change was also identified as a systemic risk across the value chain, driven by greenhouse gas emissions from resource extraction through to product use.

Based on the outcomes of the assessment, Odido has refined its prioritisation of ongoing and planned actions related to the prevention, mitigation, and remediation of salient human rights and environmental risks. The due diligence process supports the identification of areas where existing measures may be further strengthened and where additional actions may be considered over time. Current priority areas include sustainable procurement practices, supplier

engagement through structured dialogue and targeted ESG sessions, risk-based CSR audits conducted through Joint Alliance for CSR (JAC), participation in collaborative industry initiatives, and the operation of grievance mechanisms that enable stakeholders to raise concerns, including on an anonymous basis. Environmental risks identified through the assessment are considered within Odido’s climate change and circularity strategy (see [Good for the planet](#)).



The table below provides an overview of how the main steps of the due diligence process are reflected in this Sustainability Statement:

Sustainability due diligence step	How it is addressed at Odido	Where it is disclosed in the sustainability statement
Embedding due diligence in governance, strategy and business model	Due diligence principles are embedded through governance structures, risk management processes and policies, including the Integrity Policy Framework, Sustainable Procurement Policy, Supplier Code of Conduct and Human Rights Statement. Oversight of sustainability-related risks and impacts is integrated into existing management and committee structures.	Governance; Strategy; Business Conduct; Workers in the Value Chain
Engagement with affected stakeholders	Engagement with stakeholders takes place through a range of mechanisms, including employee surveys, supplier engagement, industry initiatives, customer feedback channels and collaboration with civil society organisations. Engagement approaches vary by topic and are not yet consolidated into a single due diligence framework.	Strategy – Interests and views of stakeholders; Own Workforce; Workers in the Value Chain; Consumers and End-users
Identification and assessment of negative impacts	Identification and assessment of potential and actual impacts on people and the environment are conducted through risk assessments, double materiality assessment, supplier risk screening, internal audits and participation in collaborative industry initiatives.	Double Materiality Assessment; Climate Change; Circular Economy; Workers in the Value Chain
Taking action to prevent, mitigate and remediate impacts	Actions include supplier audits and corrective action plans, policy requirements for suppliers, workforce-related programmes, grievance and whistleblowing mechanisms, and participation in collaborative initiatives aimed at addressing systemic risks in the value chain.	Own Workforce; Workers in the Value Chain; Business Conduct
Tracking effectiveness of due diligence actions	Effectiveness is tracked through a combination of audit follow-up, closure of corrective action plans, training completion rates, workforce metrics, selected environmental performance indicators and periodic management review. Outcome-based measurement is still developing for some topics.	Metrics sections across E, S and G topics
Communication on due diligence	Due diligence-related policies, processes and outcomes are communicated through this Sustainability Statement, internal training, intranet resources and stakeholder engagement.	Basis for Preparation; Governance; Sustainability Statement (overall)

Internal controls over sustainability reporting

During the reporting period, we continued to strengthen our internal control framework supporting the preparation of the Sustainability Statement. This framework is designed to enhance the reliability, completeness and integrity of sustainability-related information disclosed in this report. Our approach reflects evolving regulatory requirements and expectations for sustainability reporting, including the principles and structure of the European Sustainability Reporting Standards (ESRS).

Our sustainability reporting processes and related internal controls continue to develop and are not yet fully implemented across all reporting areas. While structured controls have been established over selected material sustainability information presented in this report, these controls are being progressively expanded and further formalised as the maturity of our reporting processes increases.



Current controls focus on key data streams and cover the end-to-end reporting process, including data identification, collection, consolidation, review and disclosure. Clear roles and responsibilities have been defined across relevant functions, and sustainability data is collected through defined and documented internal processes, supported by review and validation mechanisms prior to publication.

We remain committed to further strengthening our sustainability governance and internal control environment. As the scope, complexity and maturity of sustainability reporting continue to evolve, we will continue to enhance our processes and progressively align them with applicable regulatory frameworks and emerging best practices, including ESRS, to support transparency, comparability and accountability for stakeholders.

Strategy and business model

Business model, value chain and operating context

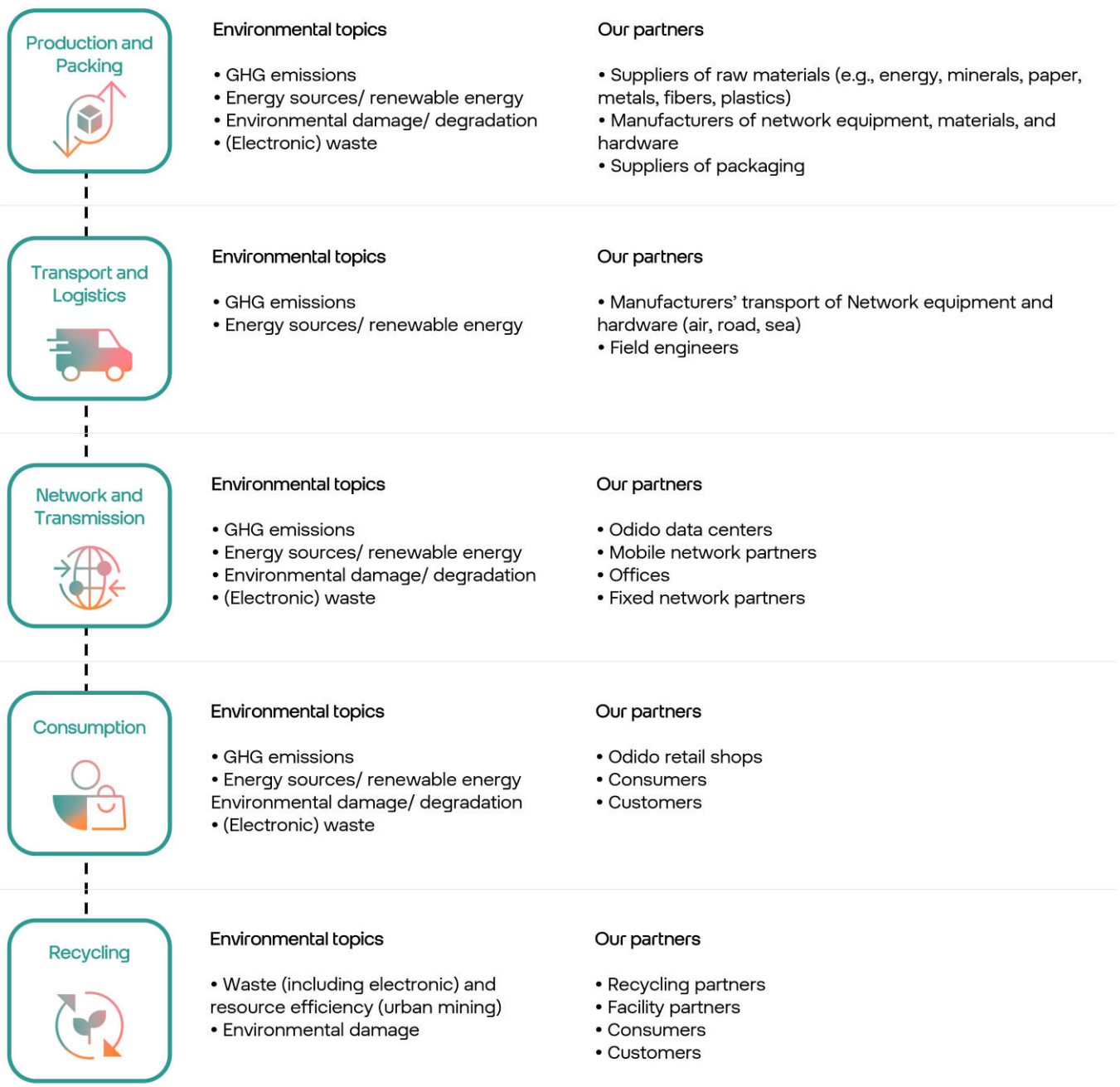
Odido operates in the Dutch telecommunications market, providing mobile and fixed-line communication services to consumer and business markets. The business model focuses on delivering reliable digital connectivity at scale, supported by investments in network infrastructure, technology platforms, and customer experience.

A detailed description of the business model, operating environment, and strategic priorities is provided in the [Business & Strategy](#) (see page 12-15). This Sustainability Statement does not replicate that analysis, but focuses on how sustainability-related considerations interact with the business model and strategy.

The value chain includes upstream suppliers of network equipment, devices, and technology services; Odido's own network operations, IT systems, and customer-facing activities; and downstream use of services by customers. While Odido does not directly extract raw materials or manufacture equipment, it is linked to environmental and social impacts in the upstream value chain through procurement activities.

Value creation within own operations is driven by network reliability, service quality, digital innovation, and operational efficiency. Sustainability-related considerations at this stage include energy consumption, network efficiency, data security, human capital resilience, and service continuity. Downstream use of services supports digital participation and economic activity, while also creating dependencies related to energy use and electronic devices.

An illustrative overview of the value chain and selected sustainability-related priorities is provided in the accompanying graphic. While this illustration focuses primarily on environmental aspects, the full scope of material sustainability topics, including social and governance matters, is reflected in the double materiality assessment and addressed throughout this Sustainability Statement. As disclosed in the [Double Materiality Assessment](#) section, the DMA will be further refined in 2026, including further consideration of how material sustainability matters are reflected across the value chain.



Interests and views of stakeholders

We engage with a broad range of stakeholders, including investors, customers, employees, suppliers and business partners, regulators, and the wider society in which we operate. Stakeholder engagement forms part of how we manage our business and sustainability-related topics.

Engagement takes place through a range of channels, including investor communications, customer feedback mechanisms, employee engagement processes, supplier interactions, regulatory dialogue, and participation in industry and community initiatives. These interactions provide insight into stakeholder expectations, emerging concerns, and areas where the business model may need to adapt.

Feedback commonly relates to service quality and reliability, data privacy and security, responsible use of technology, inclusivity and accessibility, and environmental and social impacts associated with network operations and supply chains. These perspectives are considered alongside strategic, operational, and financial factors in decision-making.

We recognise that stakeholder interests may differ and that trade-offs may be required. Stakeholder views are therefore considered as part of broader governance, strategy, and risk management discussions.



Interaction of material sustainability topics with strategy and business model

The material sustainability topics identified through the double materiality assessment are closely connected to Odido’s business model and strategic priorities. Sustainability considerations are informed by Odido’s strategic objective to become the Customer Champion and are integrated into existing strategic and operational frameworks where relevant to long-term performance, risk management, and regulatory compliance, rather than being addressed through a stand-alone sustainability strategy.

Guided by our strategic vision and the “Together for Better” approach, which is structured around three pillars - **Good for the planet**, **Everyone can participate**, and **Smart for society** - we have identified and prioritised the material sustainability topics that are most relevant to our business and key stakeholder groups. These topics are embedded in Odido’s business model and inform how Odido manages sustainability-related impacts, risks, and opportunities.

Environmental topics are primarily linked to network operations, infrastructure investments, and energy use. Social and human rights topics arise mainly in the upstream value chain, reflecting reliance on global suppliers for network equipment and devices.

Data privacy and data security are directly connected to customer trust, regulatory compliance, and the expansion of digital services. Workforce-related topics support the delivery of strategic priorities in network operations, IT transformation, and customer experience.

These topics may influence strategic decisions, operational priorities, and capital allocation across different time horizons. At the same time, the business model and strategy affect the nature and scale of sustainability-related impacts, risks, and opportunities.

Double materiality assessment

In 2023, we updated our materiality assessment and conducted our initial double materiality assessment (DMA) as part of alignment with the European Union's Corporate Sustainability Reporting Directive (CSRD). This assessment supports the further development of sustainability reporting and transparency.

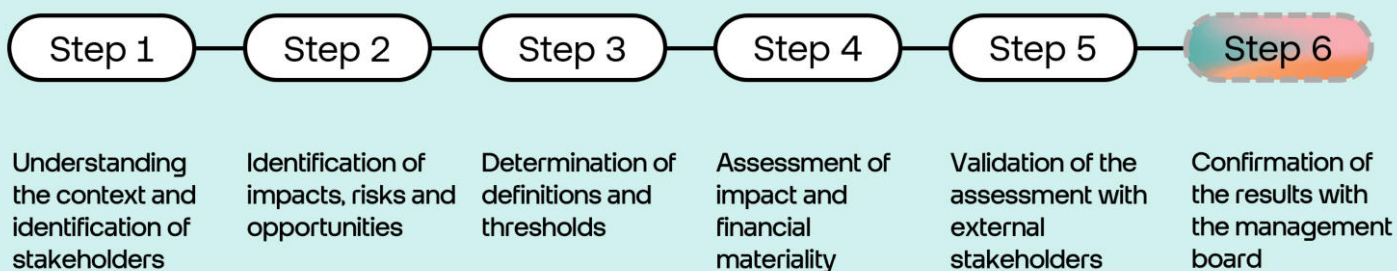
We reviewed the outcomes of the 2023 DMA and concluded that they remain relevant for the 2025 reporting period, as no significant changes were identified in business activities, operating environment, or applicable regulatory requirements. The DMA will be further refined in 2026, taking into account regulatory developments, methodological guidance, and changes in the business or operating environment.

Assessment approach

The DMA assesses sustainability matters from two perspectives:

- **Impact materiality:** How Odido's activities impact people and the environment
- **Financial materiality:** How sustainability-related matters may affect Odido's financial performance, position, or future prospects

This dual perspective supports a comprehensive identification and prioritisation of sustainability matters across the value chain.



The DMA followed a structured six-step process:

1. Context analysis and stakeholder mapping

We mapped our value chain and identified key stakeholder groups to establish a basis for engagement and assessment.

2. Identification of impacts, risks and opportunities

Industry benchmarking and expert screening were conducted to develop a mid-list of sustainability matters. This mid-list was evaluated against the sustainability matters set out in ESRS AR 16 to identify potential impacts, risks, and opportunities and their location within the value chain.

3. Determination of definitions and thresholds

Materiality was assessed using defined criteria and thresholds.

A sustainability matter is considered material from an impact perspective if it involves actual or potential positive or negative impacts on people or the environment over short-, medium-, or long-term horizons.

- Actual impacts are assessed based on severity
- Potential impacts are assessed based on severity and likelihood

Severity is assessed based on:

- Scale: seriousness of the impact on people or the environment
- Scope: extent of the impact, including the number of people or environmental area affected
- Irremediable character: the extent to which negative impacts can be reversed or mitigated

From a financial perspective, a matter is considered material if it triggers or could trigger significant financial effects on Odido. Financial materiality is assessed based on the potential magnitude and likelihood of financial impacts.

4. Assessment of impact and financial materiality

Internal surveys were conducted with stakeholders across departments to assess impact materiality. The results were reviewed with topic experts and the project team, followed by dialogue sessions with financial and risk experts to assess financial materiality.

5. Validation with external stakeholders

External stakeholders reviewed and challenged the outcomes of the assessment during a dedicated dialogue session.

6. Management Board confirmation

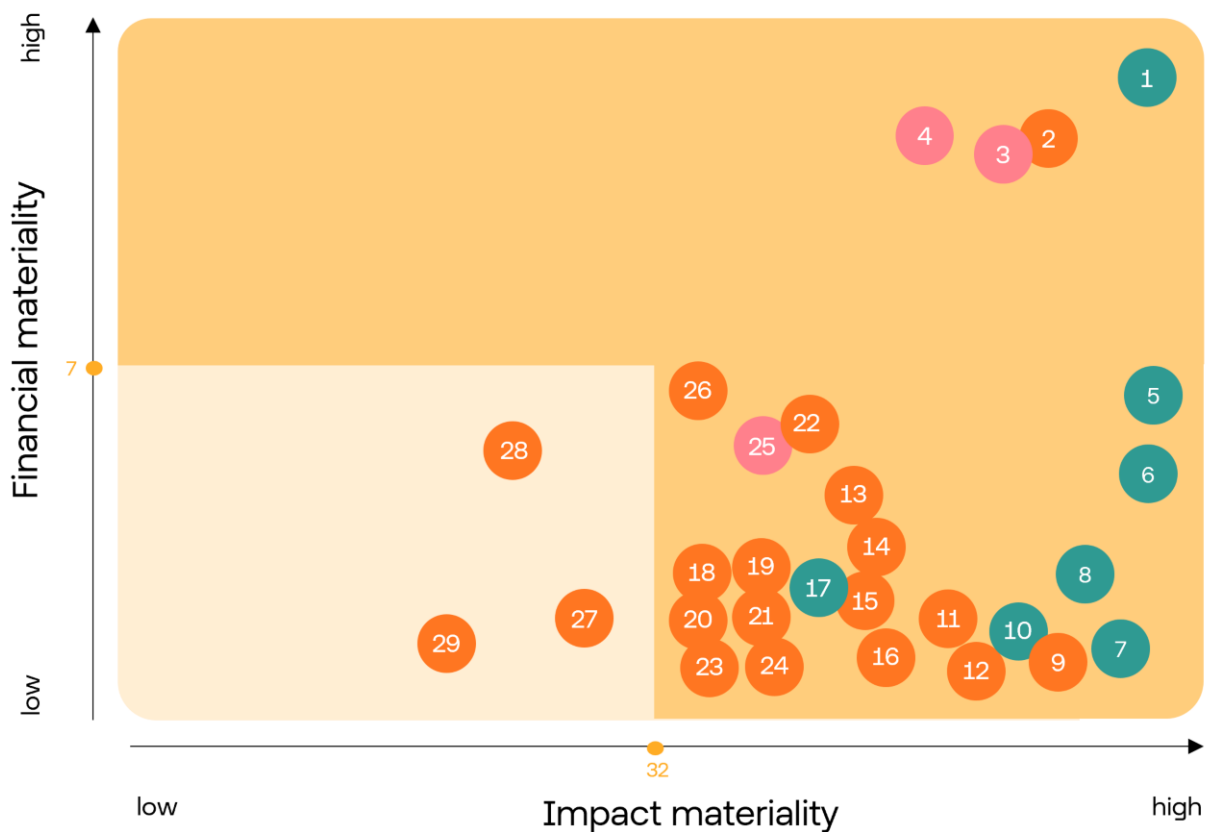
The final list of material sustainability matters was reviewed and confirmed by Odido's Management Board.

Results of the assessment

The double materiality assessment identified 29 material matters, comprising:

- 8 environmental matters
- 18 social matters
- 3 governance matters

In the materiality matrix all material matters are plotted based on their impact and financial materiality. The numbered material matters listed on the following page correspond to the numbering used in the double materiality matrix, and should be read together with it.



All 29 matters were identified as material from an impact perspective, with four also assessed as financially material. While access to products and services, access to (quality) information, and diversity in the workplace were assessed below the defined

thresholds, the Executive Committee considered them strategically important and included them as material topics. The outcomes of the DMA form the basis for the sustainability disclosures included in this Sustainability Statement.

Environment

Climate change

- Energy efficiency and consumption **(1)**
- GHG emission **(5)**
- Energy mix **(8)**

Resources and circular economy

- Resource inflows, including resource use **(6)**
- Resource outflows related to product and services **(7)**
- Plastic waste **(12)**
- Waste recycling **(17)**
- Waste (including hazardous and non-hazardous) **(10)**

Governance

Business conduct

- Cybersecurity, data & information protection **(3)**
- Sustainable innovation & technology **(4)**
- Corporate culture and business ethics **(25)**

Social

Own workforce

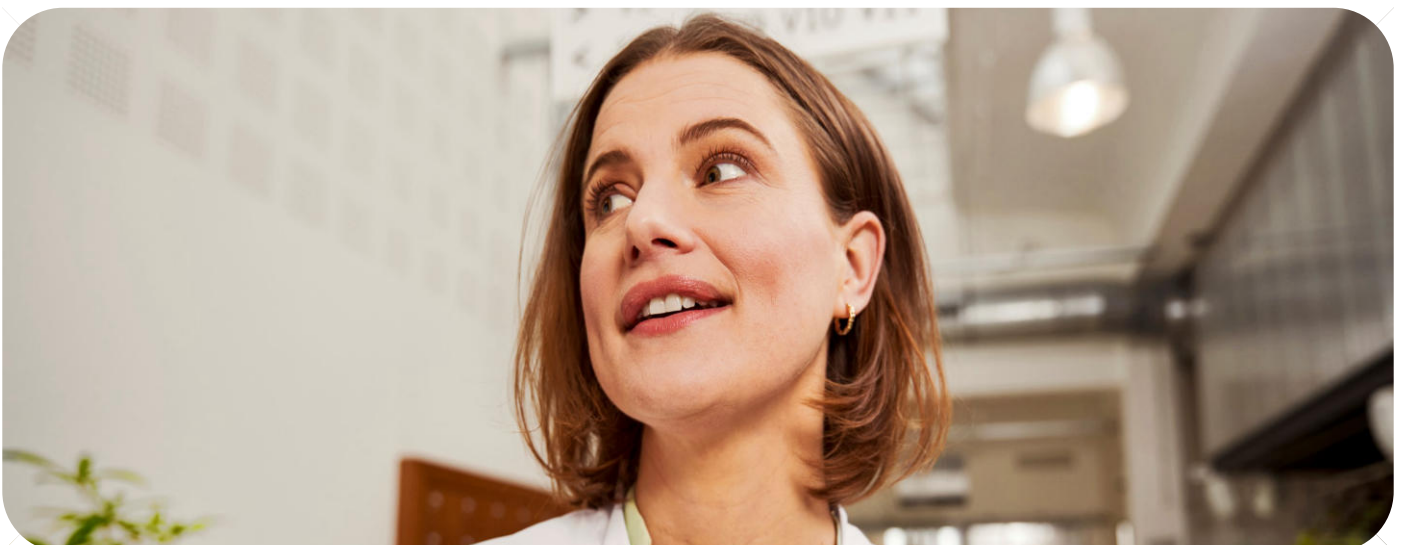
- Measures against violence and harassment in the workplace **(19)**
- Secure employment **(20)**
- Work-life balance **(21)**
- Privacy **(22)**
- Health and safety **(23)**
- Gender equality and equal pay for work equal value **(26)**
- Diversity in the workplace **(27)**

Workers in the value chain

- Child labour **(9)**
- Forced labour **(11)**
- Health and safety **(13)**
- Adequate wages **(14)**
- Measures against violence and harassment in the workplace **(15)**
- Secure employment **(16)**
- Working time **(18)**
- Freedom of association, inc. the existence of work councils **(24)**

Consumers & end-users

- Privacy for the company's consumers and end users **(2)**
- Access to products and services **(28)**
- Access to (quality) information **(29)**



Sustainability focus areas and selected targets

Together for Better - Our pillars

We group our material sustainability topics into three sustainability focus areas (pillars): Good for the planet, Everyone can participate, and Smart for society.

We have reviewed and refined these focus areas to align with the outcomes of the double materiality assessment and provide a framework for managing

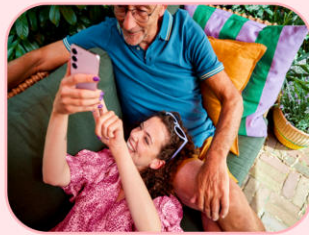
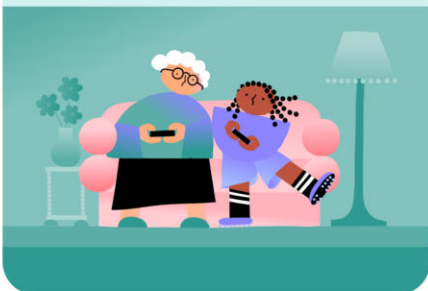
and communicating sustainability-related topics across the organisation.

The pillars reflect areas where sustainability considerations are closely linked to our business activities, value chain and stakeholder expectations, and provide a coherent way of presenting material environmental, social and governance topics.



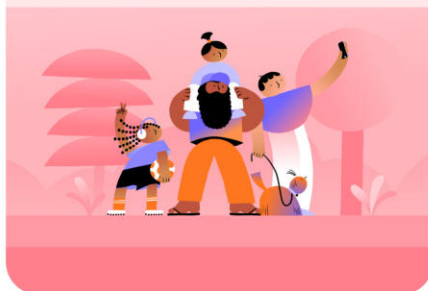
Good for the planet.

This pillar brings together environmental topics identified as material through the double materiality assessment and reflects our focus on managing environmental impacts associated with network operations and relevant upstream activities. It primarily relates to greenhouse gas emissions, energy use and efficiency, and waste and materials management.



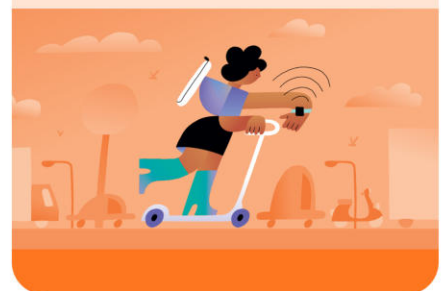
Everyone can participate.

This pillar covers social topics related to people affected by our activities, including employees, customers, and other stakeholders. It includes workforce-related matters, diversity and inclusion, well-being, and access-related considerations connected to digital participation.



Smart for Society.

This pillar addresses governance-related topics and the responsible use of technology. It includes data privacy and data security, ethical business conduct, integrity-related matters, and responsible innovation. These topics are closely linked to regulatory compliance and long-term business resilience.



Supporting the Sustainable Development Goals

We recognise the United Nations Sustainable Development Goals (SDGs) as a globally recognised reference framework for sustainable development. While our material sustainability topics are identified through our double materiality assessment, selected

SDGs are referenced to provide context for how our sustainability focus areas relate to broader societal objectives.

The mapping below illustrates areas of alignment between our sustainability focus areas and selected SDGs and should not be interpreted as a direct or measurable contribution to specific SDG targets.



SDG 5 Gender equality

Through our inclusion and diversity initiatives, we address topics related to equal opportunities and the development of women within the organisation.

SDG 7 Affordable and clean energy

This SDG is relevant to our energy use and efficiency considerations, including the integration of renewable energy sources in our operations where applicable. Initiatives such as investments in energy efficiency and the use of renewable electricity support the management of energy-related impacts associated with our activities.

SDG 8 Decent work and economic growth

Technological innovation supports productivity and service development within our business. Workforce-related initiatives, including diversity and inclusion practices and attention to safe working conditions, are linked to long-term organisational performance and employee well-being.

SDG 9 Industry, innovation and infrastructure

Our activities in developing and operating mobile networks and telecommunications services are linked to resilient digital infrastructure and innovation within the telecommunications sector.

SDG 10 Reduced inequalities

Diversity and inclusion initiatives focus on promoting equal opportunities within the organisation, including policies and practices designed to support an inclusive workplace.

SDG 12 Responsible consumption and production

This SDG is linked to energy use, materials management, waste reduction, and circularity considerations within our operations and relevant parts of the value chain.

SDG 13 Climate action

Climate-related topics addressed within our sustainability focus areas are linked to emissions management, energy efficiency, and network operations. These topics are further described in the [Climate change](#) section of this Sustainability Statement.

SDG 16 Peace, justice and strong institutions

Governance-related topics, including ethical conduct, compliance, transparency, and anti-corruption measures, are relevant to maintaining trust, regulatory compliance, and long-term business resilience.

SDG 17 Partnerships for the goals

Collaboration with external partners and participation in industry initiatives support the management of selected sustainability-related topics, particularly where collective action can complement internal governance and actions.

Sustainability Targets



Good for the planet.



Target	Material Topics	Metrics	2024 Actual	2025 Actual	Progress in 2025
Reach net-zero greenhouse gas emissions across the value chain by 2040	Climate change	Reduce absolute scope 1 and 2 (market-based) GHG emissions 95% by 2028 from a 2019 base year. (KtCO ₂ e)	1.488	1.293	- 13.1%
	Climate change	Reduce absolute scope 3 GHG emissions 25% by 2030 and 90% by 2040, from a 2022 base year (KtCO ₂ e)	322.910 ¹	297.449	- 7.9%
Increase the share of non-virgin or renewable materials in customer premises equipment to 55% by 2030	Circular Economy and Resource Use	Percentage of recycled, non-virgin or renewable materials used in CPEs for end-users	20%	33%	+ 65%
Recollect at least 12% of smartphones distributed to end users by 2030	Circular Economy and Resource Use	Recollection percentage of phones distributed to end users	1.1%	1.2%	+12.2%

1. The 2024 comparative figure has been revised to reflect updated methodologies applied in 2025.



Everyone can participate.



Targets	Material Topics	Metrics	2024 Actual	2025 Actual	Progress in 2025
By 2030, increased gender diversity to 37% woman in the total workforce, 30% in management, and 35% in top management	Own Workforce	Women in total workforce (%)	30%	29%	- 3.3%
	Own Workforce	Women in management (%)	21%	18%	- 14.3%
	Own Workforce	Women in top management (%)	44%	38%	- 13.6%
Ensure 100% health and safety management system coverage of the own workforce	Own Workforce	Health and safety management system coverage	74%	74%	-
Increase coverage of supplier spend with active third-party ESG ratings to 80% by 2030	Workers in the Value Chain	Supplier spend covered by active ESG ratings	63%	72%	+ 14.3%

Targets	Material Topics	Metrics	2024 Actual	2025 Actual	Progress in 2025
Audit 80% of suppliers classified as high-risk by 2030	Workers in the Value Chain	Audit coverage rate of high-risk suppliers	22%	44%	+ 100%
Implement five long-term human rights initiatives across the value chain by 2030	Workers in the Value Chain	Number of human rights mitigation mechanisms and initiatives	1	2	+ 100%
Expand fibre footprint in the Netherlands to 90.7% of households by 2030	Consumers and end-users	Fibre footprint percentage	85.5%	88.6%	+ 3.7%
Maintain 5G population coverage at 99.8% by 2030	Consumers and end-users	5G population coverage	93.4%	99.8%	+ 6.9%
Maintain fixed service availability at 99.9% by 2030	Consumers and end-users	Fixed service availability	99.9%	99.9%	-
Maintain mobile service availability at 99.7% by 2030	Consumers and end-users	Mobile service availability	99.7%	99.8%	+ 0.1%
Reach 25,000 people yearly through digital inclusion initiatives that support participation in a digitalising society	Consumers and end-users	Number of people reached through digital inclusion initiatives	58,945	1,940,860	+ 3,192.7%



Smart for society.

Targets	Material Topics	Metrics	2024 Actual	2025 Actual	Progress in 2025
Maintain 80% completion rate for anti-corruption and anti-bribery training among employees in elevated-risk functions	Business Conduct	Training coverage for functions-at-risk	N/A	88%	New / introduced in 2025
Maintain 80% coverage of Odido's workforce that has been trained on security & data protection	Cybersecurity, data & information protection	Percentage of workforce trained on security and data protection	84%	89%	+6%
Leverage our connectivity, knowledge, and expertise to foster sustainable innovation solutions that create lasting positive impact on society and the environment	Sustainable innovation & technology	Number of sustainable innovation initiatives actively supported ("gems")	5	5	-

Collaborations/partnership - stronger together

Carbon Disclosure Project (CDP)

An international non-profit organisation that supports companies in measuring and managing environmental impacts.

EcoVadis

EcoVadis is a global provider of business sustainability ratings, intelligence, and tools for improving performance across global supply chains. This platform allows us to benchmark our Environmental, Social and Governance (ESG) performance against global standards and to assess the sustainability performance of our suppliers.

Joint Alliance for CSR (JAC)

The association of telecom operators that aims to verify, assess and develop the CSR practices of suppliers. JAC enables us to collaboratively assess and improve practices in our supply chain.

Monet

The association that coordinates antenna placement with governments on behalf of network operators KPN, Vodafone and Odido. This coordination supports the deployment and optimisation of mobile network infrastructure while facilitating dialogue with public authorities and local communities.

NLconnect

NLconnect is the Dutch trade association for telecom, broadband and fibre providers. The association supports industry coordination and dialogue on topics related to the deployment and operation of fixed network infrastructure, including sector developments and sustainability-related topics.

Science Based Targets initiative (SBTi)

The corporate climate action organization that helps us set and achieve scientifically grounded emissions reduction targets, aligning its climate action with the latest climate science.

SER Diversiteit in Bedrijf

The knowledge platform that supports us in promoting a diverse workforce and an inclusive corporate culture regarding abilities, cultural diversity, gender, age and LGBTI+.

Stichting OPEN

The organisation responsible for the collection and recycling of e-waste on behalf of electrical appliance producers and retailers in the Netherlands.

Top Employers Institute

An organisation that certifies employers based on people and workplace practices.

UN Global Compact

The global network of organizations committed to the United Nations' Ten Principles on human rights, labour, the environment and anti-corruption, guiding us to operate with and meet fundamental responsibilities.

Join Us & MIND Us

Dutch foundations focused on supporting the well-being and development of young people, including social connection and mental health. JoinUs addresses loneliness and fosters social connections, while MIND Us helps youth build resilience and take control of their mental health.

Ookla, Umlaut & OpenSignal

Ookla, Umlaut and OpenSignal are independent platforms used to monitor and benchmark mobile and broadband network performance, including coverage, speed and user experience. These assessments provide insights that support monitoring and evaluation of network performance.



Sustainability highlights 2025

Good for the planet.



ISO14001 International standard for environmental management systems

Renewable electricity for network **100 %**

Increased use of recycled, non-virgin or renewable materials in CPEs by **+65%**

Total waste decreased by **50.7%**, following completion of the network swap

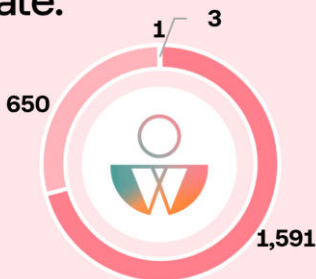
Achieved a **+12.2%** increase in phone recollection rate

CDP score **“A-”**

Reduced Scope 1 & 2 (market-based) emissions by **49.4% vs. baseline**

Everyone can participate.

- Men
- Woman
- Other
- Not disclosed



Identified high-risk supplier audit **44 %**

5G population coverage **99.8 %**

Beneficiaries reached through digital inclusion programs **1,940,860**

ISO45001 International standard for Occupational Health and Safety Management Systems

Supplier spend covered by an active global ESG ratings **72%**

Fiber footprint covering household **88.6 %**

Smart for society.



Employees trained on **security and data protection** **89%**

Training coverage for functions-at-risk **88%**

Participant in the **MANRS** global routing security initiative

Sustainable innovation initiative (“Gems”) actively supported **5**



Good for the planet

Climate change

Managing climate-related impacts

At Odido, climate change mitigation is addressed within the broader framework of Odido's Environmental Policy, which sets out general principles for managing environmental impacts arising from operations and activities. Within this framework, we focus on reducing greenhouse gas (GHG) emissions across our own operations and selected parts of the value chain through measures related to energy use, efficiency improvements, and operational practices.

This section describes the measures implemented during the reporting period and the resulting emission developments, providing context for changes observed across Scope 1, Scope 2, and Scope 3 emissions.



Scope 1: Emission developments driven by targeted operational measures

In 2025, Scope 1 emissions were 13.1% lower than in 2024. Emission developments were influenced by a combination of targeted emission-reduction measures and temporary operational constraints. A key driver of the decrease was the continued transition of the lease vehicle fleet to electric vehicles. By October 2025, 67% of the fleet was fully electric and powered by renewable electricity, reducing emissions associated with fuel combustion.

In parallel, we reduced reliance on natural gas across parts of our footprint:

- 35 of our 117 retail shops transitioned off natural gas.
- Alternative heating solutions were implemented at 14 of 23 main network locations (approximately 60%)

An additional operational measure was the introduction of company-wide practices to keep shop doors closed during periods of extreme temperatures, limiting heating and cooling losses.

These emission-reduction efforts were partly offset by an unplanned increase in gas consumption. Due to a technical failure of the thermal energy storage system (WKO) used for heating the headquarters, gas-based heating was temporarily required during the reporting period. This resulted in higher natural gas use and increased emissions from gas consumption, although total Scope 1 emissions decreased compared with 2024. Work has started on developing a new thermal well.

Within network operations, all event-related generators were switched to biodiesel, and maintenance protocols were enhanced to reduce refrigerant leakage from cooling systems, addressing emission sources with relatively high climate impact. Refrigerant leakages exceeded the target level, mainly due to a limited number of incidents. While the phase-out of high-GWP (Global Warming Potential) refrigerants is ongoing, its pace is not fully aligned with the linear GHG reduction target, as replacement is linked to technical and economic lifetimes.

Scope 2: Renewable electricity sourcing and energy efficiency

Odido continues to report zero market-based Scope 2 emissions through the use of 100% renewable electricity, supported by Guarantees of Origin (GoOs), to power antennas, retail shops, offices, network locations, and the lease vehicle fleet.

Alongside renewable electricity sourcing, we implemented several energy efficiency measures within network operations. These included optimisation of cooling systems at network locations, decommissioning of the 2G network, and the introduction of "sleep mode" functionality in parts of the radio network during night-time hours to reduce electricity consumption.

Despite these measures, total electricity consumption increased in 2025, driven by rising data usage and the operation of an additional 5G carrier. While the additional carrier was introduced in mid-2024, 2025 represents the first full year in which its impact on electricity consumption is reflected. However, due to changes in electricity emission factors and/or energy sourcing, location-based Scope 2 emissions decreased by 11.5% compared to 2024.

Scope 3: Methodological refinement and emission profile

Scope 3 emissions in 2025 were influenced by both underlying activity levels and changes in calculation methodology during the year (see Updates in Calculation Methodologies and Presentation). To improve the accuracy of reporting, the 2024 comparative figures were revised for purchased goods and services and capital goods, which also affected total upstream emissions and total Scope 3 emissions. On this revised basis, total Scope 3 emissions decreased by 7.9% compared to the prior year.

Purchased Goods and Services remained the largest contributing Scope 3 category, reflecting emissions associated with the production and delivery of procured materials and products. In particular, spend related to civil works (such as fibre roll-out) increased in absolute terms.

The second-largest category, Downstream Leased Assets, is primarily driven by electricity consumption from modems and TV boxes installed at customer premises. Emissions in this category increased in line with growth in the installed base of devices.

Climate transition plan for mitigation

Odido has established a climate transition plan for greenhouse gas mitigation, which sets out how Odido intends to reduce emissions across its operations and value chain over time and support alignment with the transition to a low-carbon economy. Given the internal nature and ongoing development of this plan, the information disclosed below represents a summary of its key elements rather than a full description of all underlying analyses, assumptions and implementation details.

Odido is included in EU Paris-Aligned Benchmarks, reflecting an external assessment that our activities are aligned with the objective of limiting global warming to 1.5°C in line with the Paris Agreement.

To support this alignment, we have adopted the Science Based Targets initiative (SBTi) methodology as the basis for defining our greenhouse gas emission reduction targets. These targets provide the central reference point for our transition efforts and are integrated into our operational decision-making.

The primary objectives guiding our climate transition efforts are:

- reducing greenhouse gas emissions across Scope 1, Scope 2 and Scope 3;
- improving energy efficiency in network infrastructure, offices and fleet operations;
- increasing the use of renewable electricity and reducing reliance on fossil fuels;
- strengthening resilience to climate-related risks to support continuity of services.



Decarbonisation is pursued through a combination of operational measures and value-chain engagement. Within our own operations, this includes electrification of the lease vehicle fleet, reductions in natural gas use, energy efficiency measures in network operations, and the sourcing of renewable electricity. In the value chain, we engage with suppliers to address emissions related to purchased goods and services, customer premises equipment, business travel and logistics, as described in the Scope 3 section.

Certain greenhouse gas emissions are linked to long-lived physical assets that are essential for reliable network operations. These include emissions associated with refrigerant leakage from cooling installations at network locations and the use of diesel-powered backup generators. These assets have long depreciation periods and contribute to so-called locked-in emissions. We take these constraints into account in our transition approach by prioritising efficiency improvements, maintenance practices and gradual replacement where technically and operationally feasible.

Governance of climate-related topics is embedded at both management and board levels. Responsibilities for climate change mitigation are assigned to members of the Executive Committee, including the Chief Executive Officer, Chief Financial Officer and Chief Network Officer, in line with the Environmental Policy. The climate transition approach, including targets and key measures, is reviewed and approved by the Chief Financial Officer and is integrated into broader strategy, risk management and financial planning processes.



Progress in implementing this transition approach is monitored through annual greenhouse gas emissions reporting, tracking of target achievement and qualitative assessment of implemented measures. Interim developments and actions are reflected in the Scope 1, Scope 2 and Scope 3 disclosures and in the targets presented in this section. As governance structures, data quality and planning processes continue to mature, Odido intends to further refine its climate transition approach over time.

Targets supporting climate change mitigation

Odido has defined greenhouse gas emission reduction targets that provide a reference framework for its climate change mitigation efforts. These targets reflect the current level of ambition and are subject to further refinement as governance, data quality, and transition planning continue to develop.

Odido has set the objective to reach net-zero greenhouse gas emissions across the value chain by 2040. This objective is supported by absolute emission

reduction targets covering Scope 1, Scope 2, and Scope 3 emissions.

For Scope 1 and Scope 2 (market-based) emissions, Odido aims to reduce absolute greenhouse gas emissions by 95% by 2028 compared to a 2019 base year, expressed in kilotonnes of CO₂ equivalents (ktCO₂e).

For Scope 3 emissions, Odido has set absolute reduction targets of 25% by 2030 and 90% by 2040 compared to a 2022 base year, expressed in kilotonnes of CO₂ equivalents (ktCO₂e). These targets reflect the material contribution of value chain emissions to the overall emissions profile and the longer time horizon required to address emissions outside direct operational control.

Odido has entered into a ten-year Power Purchase Agreement (PPA) with Wind Farm Willem Annapolder II to source approximately 30% of its electricity demand directly from the wind farm. In 2025, the first electricity generated by the four newly installed turbines was delivered to Odido, marking an important milestone in the partnership. While Odido already sources 100% renewable electricity, the PPA further strengthens the company's decarbonisation strategy by securing long-term access to additional renewable generation. Once fully operational, the wind farm is expected to generate approximately 58,000 MWh of electricity annually using highly efficient turbines. This collaboration supports Odido's ambition to reduce its Scope 1 and Scope 2 (market-based) greenhouse gas emissions by 95% by 2028.



In 2025, we prolonged a CDP Leadership Score by raising our **Climate score to "A-"**

Greenhouse Gas Emissions Measurement and Reporting

Greenhouse Gas Emissions Calculation Method

Odido calculates greenhouse gas emissions using an internal calculation manual based on the principles of the Greenhouse Gas Protocol (GHG Protocol), a globally recognised standard for emissions accounting and reporting. Emissions are reported in metric tonnes of CO₂ equivalents (CO₂e) and cover the period from 1 January to 31 December 2025, including all entities within Odido Netherlands Holding B.V.

Emissions calculations rely primarily on direct measurements, meter readings, and invoices, including third-party verified data where available.

The emissions data cover three scopes:

- Scope 1: Direct emissions from owned or controlled sources, including fuel used by the lease vehicle fleet, natural gas for heating, refrigerant leakage from cooling systems, and fuel used in backup generators
- Scope 2: Indirect emissions from purchased energy, including electricity used for fixed and mobile networks, data centres, offices, retail shops, and the lease vehicle fleet
- Scope 3: Indirect emissions from sources not owned or controlled by Odido, including the production, distribution, and use of smartphones, customer premises equipment (CPE), network construction and operation, and media-related marketing activities

For Scope 1 and Scope 2 emissions, an operational control approach is applied. Emissions are expressed in CO₂ equivalents (CO₂e), with carbon dioxide (CO₂) representing the most relevant greenhouse gas. Emission factors are sourced from CO₂emissiefactoren.nl.

For Scope 2 emissions, we report using both market-based (used for goal setting) and location-based methodologies. These calculations are based on well-to-wheel (WTW) CO₂e emission factors for renewable electricity, where the WTW emission values for renewable sources (wind, biomass, solar energy) are zero. CO₂e emissions from the well-to-tank (WTT) phase are included in our scope 3 emissions.

For Scope 3 emissions, two methodologies are applied:

1. Activity-based method: Uses quantity data such as the number of products sold or

kilowatt-hours of electricity consumed to calculate emissions. This approach is applied to business travel, employee commuting, handsets and CPE, roaming, upstream transportation, waste, interconnect, WTT fuel and energy, and the use of modems and TV boxes by customers and end-users.

2. Spend-based method: Uses supplier-reported spend-based emission factors (kg CO₂e/€), derived from suppliers' reported Scope 1, Scope 2, and relevant upstream Scope 3 emissions relative to revenue.

Where supplier-specific data are unavailable, average values are used. Energy consumption estimates for customer equipment are based on usage assumptions. During the reporting year, the assumption for set-top boxes was updated based on a European study (4 hours active use and 20 hours standby per day), while the assumption for modems remained unchanged (20 hours at maximum power and 4 hours in standby).

Emissions related to the use of CPE units are categorised under Scope 3 Category 13 (Downstream Leased Assets), while emissions related to the production of CPE units are categorised under Scope 3 Category 2 (Capital Goods), in line with industry practice and SBTi guidance.

Updates in Calculation Methodologies and Presentation

As part of ongoing efforts to improve data quality and transparency, we continue to refine emissions accounting and reporting processes. Methodological changes implemented during 2025 represent an incremental improvement and provide a more robust basis for understanding the current emissions profile.

Key changes include the refinement of the methodology for calculating Scope 3 emissions in the categories Purchased Goods and Services and Capital Goods. During 2025, we transitioned from industry-average emission factors based on environmentally extended input-output (EEIO) models to supplier-reported spend-based emission factors where available. This shift improves the accuracy and representativeness of Scope 3 emissions estimates.

This methodological improvement provides a more specific representation of suppliers' emission profiles and resulted in higher reported Scope 3 emissions due to the use of more detailed and comprehensive data.

Scope 1 emissions (ton CO₂e)

	2019 (Base Year)	2024	2025
Gas	462	282	316
Car-fleet	1,514	876	611
Diesel stationary	512	199	108
Coolants	66	132	259
Total	2,555	1,488	1,293
<i>percentage compared to base year (2019)</i>	<i>100%</i>	<i>58%</i>	<i>51%</i>

Scope 2 emissions

	2019 (Base Year)	2024	2025
Electricity (MWh)	131,900	203,921	221,517
GHG emissions market based (ton CO ₂ e)	0	0	0
GHG emissions location based (ton CO ₂ e)	75,447	55,059	48,734



Scope 3 emissions (ton CO₂e)

	2022 ¹ (Base Year)	2024	2025
Purchased goods and services ²	116,179	173,191	160,413
Capital goods ³	9,669	56,283	41,895
Fuel- and energy-related activities	1,214	420	272
Upstream transportation and distribution	10,517	11,429	4,918
Waste generated in operation	9	6	3
Business travel	321	203	301
Employee commuting	2,111	1,444	1,141
Upstream leased assets	-	-	-
Downstream transportation and distribution	1	2	2
Processing of sold products	-	-	-
Use of sold products	9,455	6,139	6,012
End-of-life treatment of sold products	510	483	190
Downstream leased assets	87,790	73,310	82,302
Franchises	-	-	-
Investments	-	-	-
Total⁴	237,777	322,910	297,449
<i>percentage compared to base year (2022)</i>	<i>100%</i>	<i>136%</i>	<i>125%</i>
Total upstream emissions⁵	140,021	242,975	208,943
Total downstream emissions	97,756	79,935	88,506

1 The 2022 base year figure has not been recalculated using the new supplier-reported spend-based methodology applied in 2025 for Purchased Goods and Services and Capital Goods, as this methodology was introduced in 2025 where maturity and availability of supplier-reported data increased, improving the accuracy and representativeness of Scope 3 emissions calculations.

2 The methodology for calculating emissions from purchased goods and services was updated in 2025 following the transition to a supplier-reported spend-based methodology. As a result, the 2024 comparative figure has been revised to 173,191 tCO₂e (previously reported: 83,915 tCO₂e).

3 The methodology for calculating emissions from capital goods was updated in 2025 following the transition to a supplier-reported, spend-based methodology. As a result, the 2024 comparative figure has been revised to 56,283 tCO₂e (previously reported: 60,890 tCO₂e).

4 The 2024 total Scope 3 emissions figure has been revised to reflect updated methodologies for calculating emissions from purchased goods and services and capital goods. As a result, the 2024 comparative figure has been revised to 322,910 tCO₂e (previously reported: 238,241 tCO₂e).

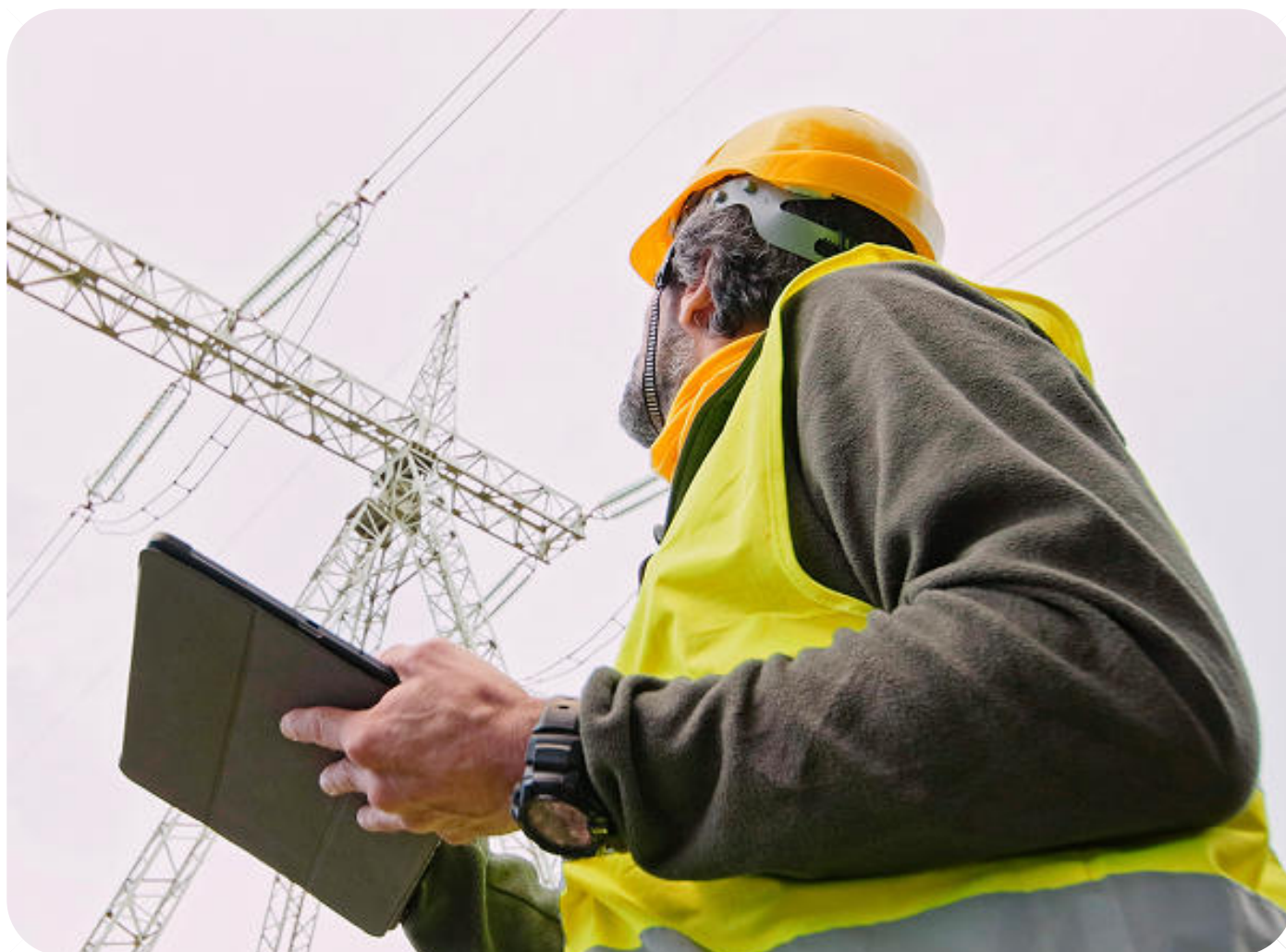
5 The 2024 total upstream emissions figure has been revised to reflect updated methodologies for calculating emissions from purchased goods and services and capital goods. As a result, the 2024 comparative figure has been revised to 242,975 tCO₂e (previously reported: 158,307 tCO₂e).



Energy consumption and mix

	2025	2024
Fuel consumption from crude oil and petroleum products (MWh)	2,933	4,254
Fuel consumption from natural gas (MWh)	1,562	1,394
Total fossil energy consumption (MWh)	4,495	5,648
Share of fossil sources in total energy consumption (%)	2%	2.7%
Fuel consumption from renewable sources, including biomass (MWh) ¹	934	300
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	221,517	203,921
Total renewable energy consumption (MWh)	222,450	204,221
Share of renewable sources in total energy consumption (%)	98%	97.3%
Total energy consumption (MWh)	226,945	209,869

¹ Fuel volumes (litres) were converted to energy (MWh) using the UK Government GHG Reporting Conversion Factors 2024 (DESNZ) and, for HVO100, EN 15940. The following factors were applied: petrol: 0.00878 MWh/l; diesel: 0.00994 MWh/l; HVO100: 0.00936 MWh/l.





Circular economy and resource use

Managing resource use and circularity

At Odido, our approach to resource use and circular economy is set out in the Environmental Policy and supported by the Sustainable Procurement Policy. Together, these policies provide the framework for managing material impacts, risks, and opportunities related to resource consumption, waste generation, and product lifecycles, while supporting a gradual transition towards more circular practices.

The Environmental Policy focuses on identifying and managing environmental impacts and risks, improving resource efficiency, promoting circular economy practices, and applying the EU Waste Hierarchy. The Sustainable Procurement Policy complements this approach by defining environmental, social, and governance criteria for supplier selection, requiring adherence to the Supplier Code of Conduct, and monitoring supplier performance on social and environmental topics, including through corporate social responsibility audits.

These policies apply to our own operations and to relevant parts of the upstream and downstream value chain. The scope includes the design, construction, and operation of fixed and mobile networks, as well as the physical product portfolio, including handsets, accessories, and customer premises equipment (CPE), together with warehousing and distribution activities. While operations are located in the Netherlands, sourcing of products and materials is global. Within this scope, the policies address the reduction of reliance on virgin resources by prioritising, where technically feasible and financially viable, the procurement of equipment containing recycled or renewable materials.

Governance of environmental and circular economy matters is assigned to the Chief Financial Officer, and the Head of Procurement and Wholesale. Accountability for the delivery of circular economy related targets are assigned to the relevant Executive Committee members, reflecting where the underlying impacts sit within the business. Under this governance, circular economy initiatives include applying lifecycle design principles to network equipment, encouraging customer returns of used equipment, and collaborating with manufacturers,

recyclers, and other industry stakeholders. In 2025, a circularity scorecard for requests for information (RFIs) and requests for proposal (RFPs) was developed. An Impact, Risk and Opportunity analysis is planned for 2026, after which relevant policies are expected to be reviewed and updated.

Actions implemented during the reporting period

During 2025, we implemented a number of actions related to circular economy practices. These included increased engagement with suppliers to expand the use of refurbished and remanufactured network equipment, resulting in the purchase of a first batch of remanufactured routers for B2B customers. In parallel, we piloted the placement of 15 dedicated smartphone recollection bins across selected retail shops and the head office in The Hague. A broader roll-out and related customer communication are planned for 2026, subject to evaluation of the pilot.

Additional actions in 2025 included the launch of a new Trade-In proposition to encourage customers to return used smartphones for reuse or responsible recycling, as well as started offering refurbished smartphones under the Ben brand in December 2025. These actions build on existing practices, including refurbishment of customer premises equipment for reuse, offering a boxless TV proposition via an app, and working with an external partner to support refurbishment, resale, or recycling of obsolete network equipment and customer premises equipment.

Following the material flow analyses (MFAs) conducted in 2023 and 2024, we further strengthened our efforts in 2025 to improve data availability and data quality related to resource inflows and outflows. These improvements are intended to support future reporting cycles and will be continued in 2026.

Targets supporting circular economy practices

To support progress over time, we have defined targets related to resource use and circular economy. These targets are based on internal assessments of operational scope, product portfolio, supplier engagement, and data availability, and take into account existing circular practices, expected developments in supplier offerings, and feasibility within current operational processes.

In defining interim milestones, consideration was given to the phased roll-out of circular initiatives,

anticipated improvements in data collection, and the gradual integration of circular requirements into procurement processes and customer propositions. Assumptions underlying the targets include the continued availability of refurbished and recycled materials, supplier participation, and customer engagement in return and trade-in schemes. Methodologies and assumptions may be refined over time as data quality improves and additional insights become available through planned assessments.

Use of non-virgin or renewable materials in Customer Premises Equipment

The first target aims to increase the share of non-virgin or renewable materials in Customer Premises Equipment to 55% by 2030. The scope includes indoor retail CPE provided to end-users, including modems, routers, TV set-top boxes, optical network terminals, WiFi points, and related accessories like power adapters and cables, but excluding packaging.

Progress is measured as the percentage, by weight, of recycled or renewable materials relative to the total weight of CPE placed on the market. The baseline year is 2023, with a baseline value of 0.5%. Performance will be assessed against the 2030 target.



Smartphone recollection

The second target aims to recollect at least 12% of smartphones distributed to end-users by 2030 through trade-in schemes and collection bins at offices and retail shops. Progress is measured as the recollection percentage of smartphones and tablets distributed, excluding returns of new devices.

The scope excludes smartwatches, Wi-Fi routers, modems or demo devices. The baseline year is 2023, with a baseline value of 0.50%. Performance will be assessed against the 2030 target.

Metrics related to resource use and circular economy

The metrics disclosed below provide insight into resource use and circular economy practices within Odido's operations and product portfolio. Some metrics are directly linked to the monitoring of defined targets, while others are disclosed to support transparency and the development of baseline information. Explanatory narrative is provided where relevant.

Waste (kg)	2025	2024
Waste diverted from disposal	589,261	1,363,230
Waste directed to disposal ¹	223,528	286,941
Total waste generated²	812,789	1,650,171
Hazardous waste	16,711	30,123
Non-hazardous waste	796,078	1,620,048

1 Non-recycled waste is equal to waste directed to disposal.

2 Total waste generated = waste diverted from disposal + waste directed to disposal. Total waste decreased as the majority of network swap was finalized mid-2025, resulting in less obsolete network equipment entering re-use and recycling/disposal streams.

Waste diverted from disposal	2025		2024	
	Hazardous waste (kg)	Non-hazardous waste (kg)	Hazardous waste (kg)	Non-hazardous waste (kg)
Recovery operation type				
Preparation for reuse	-	88,085	247	626,253
Recycling	14,462	454,798	25,395	711,336
Other recovery operations ¹	-	31,916	-	-
Subtotal by waste type	14,462	574,799	25,642	1,337,588
Total waste diverted from disposal	589,261		1,363,230	

1 Other recovery operations include the biological degradation of products used as raw materials, such as frying oil, coffee grounds, pruning waste, and other organic waste.

Waste directed to disposal	2025		2024	
	Hazardous waste (kg)	Non-hazardous waste (kg)	Hazardous waste (kg)	Non-hazardous waste (kg)
Waste treatment type				
Incineration	2,099	221,135	4,183	281,408
Landfill	150	144	299	1,051
Subtotal by waste type	2,249	221,279	4,481	282,460
Total waste directed to disposal	223,528		286,941	

	2025	2024
Percentage of recycled/non-virgin or renewable materials used in CPEs for end-users	33%	20%
Recollection percentage of phones distributed to end-users	1.2%	1.1%

Percentage of recycled, non-virgin or renewable materials used in CPEs for end-users

This metric measures the percentage, by weight, of recycled, non-virgin, or renewable materials used in Customer Premises Equipment provided to end-users. The scope includes indoor CPE and related accessories, excluding packaging, outdoor CPE, and CPE leased from fibre line providers. Data is obtained from CPE manufacturers and suppliers.

Recollection percentage of phones distributed to end-users

This metric measures the percentage of smartphones recollection through sales schemes and collection bins at Odido's own facilities compared to the total number of smartphones sold, excluding returns of new devices. The scope includes smartphones and excludes other devices. Data is based on internal sales and collection records.

EU taxonomy disclosures

Introduction

The EU Taxonomy Regulation (EU 2020/852), effective since 12 July 2020, establishes a classification system that identifies environmentally sustainable economic activities to help direct capital flows towards the EU's climate and environmental objectives. The regulation defines six environmental objectives:

- Climate Change Mitigation (CCM)
- Climate Change Adaptation (CCA)
- 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

While Odido's obligation to report under the EU Taxonomy will commence in 2028, in line with the CSRD requirements applicable for FY27, Odido has elected to conduct and disclose its EU Taxonomy analysis voluntarily for the 2025 reporting year. This early adoption supports our CSRD readiness and enables the further development of internal processes, data quality and governance frameworks ahead of mandatory compliance.

In this context, Odido assessed its economic activities to determine their eligibility under the EU Taxonomy framework and evaluated the proportion of Turnover, Capital Expenditure (CapEx) and Operating Expenditure (OpEx) associated with those activities. Where activities were identified as eligible, an assessment framework was applied to determine whether the technical screening criteria for alignment were met, including substantial contribution, do no significant harm (DNSH), and compliance with the applicable minimum safeguards.

The 2025 assessment builds on Odido's existing sustainability governance and reporting processes and reflects regulatory developments introduced through Commission Delegated Regulation (EU) 2021/2178 (the "Disclosures Delegated Act"), Commission Delegated Regulation (EU) 2021/2139 (the "Climate Delegated Act") and Commission Delegated Regulation (EU) 2023/2486 (the "Environmental Delegated Act"). For the 2025 reporting period, Odido applied the amendments to the EU Taxonomy Delegated Acts that entered into force in January 2026, including the



introduction of a quantitative materiality threshold for alignment assessment purposes.

As described in the Determination of Taxonomy Alignment section, all identified eligible activities for 2025 were below the applicable materiality threshold and, accordingly, no activities are reported as EU Taxonomy-aligned for the reporting period.

Odido notes that the current EU Taxonomy framework does not yet include certain core telecommunications activities within the scope of eligible economic activities. Odido also acknowledges the emerging divergence in practice within the telecommunications sector regarding the assessment of Taxonomy-eligible CapEx and OpEx, including in relation to electric and electronic equipment under category c) as purchases of output from Taxonomy-eligible activities. Accordingly, the reported Taxonomy-eligible and Taxonomy-aligned KPIs may not fully reflect the Company's broader sustainability initiatives and environmental performance. Odido has considered relevant interpretative guidance and current market practice in preparing these disclosures and will continue to monitor developments that may affect future assessments and disclosures.

Methodology

Methodological Update and Regulatory Developments

The EU Taxonomy assessment for the 2025 reporting period was performed in accordance with the regulatory framework applicable at the reporting date. Amendments entering into force in January 2026 introduced clarifications and updates to certain technical screening criteria, disclosure requirements and methodological interpretations. The current disclosure reflects the application of these updated provisions.

These regulatory developments did not result in changes to Odido's underlying economic activities. Instead, they led to refinements in the interpretation and methodological application of the EU Taxonomy framework. The reported results reflect the application of the updated regulatory guidance rather than changes in Odido's operations or business activities.

In line with the January 2026 amendments, a 10% quantitative materiality threshold was applied separately to the Turnover, CapEx, and OpEx KPIs, based on the cumulative contribution of the relevant aggregated economic activities to each KPI.

For the 2025 reporting period, all identified eligible activities were assessed to be significantly below this threshold relative to the respective KPI denominators.

As a result, a materiality-based validation approach was applied in accordance with the amended framework. Given the limited materiality of the identified activities, no detailed reassessment of the technical screening criteria for Taxonomy alignment was performed for the reporting period.



Scope and exemptions

The EU Taxonomy assessment has been prepared on a consolidated basis, consistent with the scope of the consolidated financial statements prepared in accordance with IFRS as adopted by the EU. The same financial reporting perimeter and accounting policies are applied for the calculation of the Taxonomy KPIs.

The assessment is based on Odido's interpretation of the EU Taxonomy Regulation and the applicable Delegated Acts, taking into account the nature of its business model, the accounting treatment applied, and the guidance available at the time of reporting. As the EU Taxonomy framework continues to evolve and further guidance or clarifications are issued by the European Commission or supervisory authorities, the scope, classification and alignment of activities may be subject to change in future reporting periods.

In line with the Delegated Act:

- Only revenue from contracts with customers is included in the Turnover KPI.
- The EU Taxonomy-defined OpEx denominator was assessed and determined to be not material relative to Odido's total operating expenditure. Accordingly, the OpEx KPI is not presented for the reporting period, in line with the exemption provided under Article 2(1)(c) of the Disclosures Delegated Act.

Identification of Taxonomy-Eligible Activities

Following a systematic review of our operations and procurement activities, the following economic activities were identified as Taxonomy-eligible under the Climate Delegated Act and the Environmental Delegated Act:

Climate Change Mitigation (CCM)

Taxonomy-eligible activity	Related KPI
CCM 6.5 Transport by motorbikes, passenger cars and light commercial vehicles	CapEx
CCM 7.3 Installation, maintenance and repair of energy efficiency equipment	CapEx
CCM 7.6 Installation, maintenance and repair of renewable energy technologies	CapEx

Environmental objective	Activity included in the EU taxonomy	Definition of the activity	Corresponding activity
Climate Change Mitigation	CCM 6.5 Transport by motorbikes, passenger cars and light commercial vehicles	Purchase, financing, renting, leasing and operation of vehicles	Odido operates a fleet of electric and fossil fuel vehicles that are leased and used for business purposes
	CCM 7.3 Installation, maintenance and repair of energy efficiency equipment	Individual renovation measures consisting in installation, maintenance or repair of energy efficiency equipment	Odido undertakes replacement of systems and equipment with more energy-efficient alternatives as part of ongoing facility and operational improvements (i.e. improving building insulation, replacing windows, and upgrading HVAC and water-heating systems)
	CCM 7.6 Installation, maintenance and repair of renewable energy technologies	Installation, maintenance and repair of renewable energy technologies, on-site	Odido undertakes the installation and replacement of renewable energy-based systems on-site, including technologies such as solar photovoltaic (PV) panels and heat-pump systems
Transition to a Circular Economy	CE 5.4 Sale of second-hand goods	Sale of second-hand goods that have been used for their intended purpose before by a customer (physical person or legal person), possibly after repair, refurbishment or remanufacturing	Odido engages in the resale of smartphones, used network equipment and customer-premises equipment (CPEs) as part of its circular economy initiatives
	CE 5.5 Product-as-a-service and other circular use- and result-oriented service models	Providing customers with access to products through service models, which are either use-oriented services, where the product is still central, but its ownership remains with the provider and the product is leased, shared, rented or pooled; or result-oriented, where the payment is pre-defined and the agreed result (i.e. pay per service unit) is delivered	Odido's Trade-in and Recycle Deal offering provides customers with smartphones under a contractual model in which product ownership remains with Odido for the duration of the contract

Determination of Taxonomy Alignment

Where activities were identified as eligible, Odido evaluated whether a detailed technical alignment assessment was required in accordance with the amended EU Taxonomy framework.

In line with the January 2026 amendments and the applied 10% quantitative materiality threshold, all

Transition to a circular economy (CE)

Taxonomy-eligible activity	Related KPI
CE 5.4 Sale of second-hand goods	Turnover
CE 5.5 Product-as-a-service and other circular use- and result-oriented service models	Turnover

These activities reflect our role as a telecom provider that relies on energy-efficient infrastructure, integrates on-site renewable energy, and manages devices and equipment through circular business models.

The overview of economic activities identified as eligible under the EU Taxonomy is presented below:

identified eligible activities were determined to be below the materiality threshold relative to the relevant KPI denominators.

Accordingly, a materiality-based validation approach was applied. The review was limited to confirming continued eligibility and assessing whether any material changes occurred that would affect prior-

year conclusions. No expanded reassessment of the technical screening criteria for substantial contribution and DNSH was performed for the reporting period.

As a result, no activities are reported as EU Taxonomy-aligned for the 2025 reporting period.

Minimum Safeguards

Minimum safeguards under Article 18 of Regulation (EU) 2020/852 are implemented at entity level and apply across all operations. Odido has established governance, risk management and compliance frameworks designed to promote alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs).

Human rights and responsible business conduct considerations are embedded within Odido's policies and procedures, including its Code of Conduct, Supplier Code of Conduct, anti-corruption framework and compliance policies. These frameworks set out expectations relating to labour standards, human rights, environmental protection, ethical conduct and responsible supply chain practices.

Odido applies a risk-based human rights due diligence approach. This includes periodic risk assessments to identify and evaluate actual and potential adverse impacts across operations and the supply chain. Supplier risk exposure is assessed through onboarding due diligence, contractual requirements, ESG performance monitoring and participation in industry initiatives such as the Joint Alliance for CSR (JAC),

which includes audit programs and corrective action follow-up processes where required.

Human rights and sustainability considerations are integrated into procurement and supplier management processes. Suppliers are required to adhere to the Supplier Code of Conduct and to accept mandatory contractual clauses addressing legal compliance, human rights and anti-corruption standards. Key suppliers may also be subject to ESG rating assessments and targeted engagement where elevated risks are identified.

Odido maintains accessible grievance and whistleblowing mechanisms available to employees, suppliers and external stakeholders. Reported concerns are assessed in accordance with established investigation procedures, and appropriate remedial actions are implemented where necessary. Oversight of ethics and compliance matters is maintained through internal governance structures.

As part of the continued development of Odido's EU Taxonomy reporting framework, documentation and evidencing procedures supporting the minimum safeguards assessment are being further enhanced. No activities are reported as EU Taxonomy-aligned for the 2025 reporting period.

Accounting principles: EU Taxonomy KPIs

Economic activities were identified and mapped to the EU Taxonomy based on the nature



of Odido's underlying business activities and the definitions provided in the EU Taxonomy Delegated Acts. Turnover, capital expenditure (CapEx) and operating expenditure (OpEx) amounts were allocated to the relevant economic activities using information derived from the consolidated financial statements, underlying accounting records and relevant operational information. To avoid double counting, each financial amount was attributed to a single economic activity and was not allocated to multiple activities or KPIs.

Turnover

The Turnover KPI reflects the proportion of Odido's revenue from contracts with customers that is associated with Taxonomy-eligible and Taxonomy-aligned economic activities. For 2025, revenue amounted to EUR 2,378.7 million, based on the consolidated financial statements (see [Note 16](#)).

Eligible turnover primarily relates to:

- Refurbished smartphone sales (CE 5.4): EUR 15.7 million
- Recycle Deal service revenue (CE 5.5): EUR 0.9 million

Together, these activities represent approximately 0.7% of total turnover and are significantly below the 10% materiality threshold (EUR 237.9 million).

Proceeds presented under Other operating income are excluded from the Turnover KPI denominator and numerator in accordance with Article 8 of the EU Taxonomy Delegated Act. All remaining revenues relate to activities that fall outside the scope of the Climate and Environmental Delegated Acts and are therefore classified as non-eligible for EU Taxonomy purposes.

Capital Expenditure (CapEx)

The CapEx KPI reflects investments made during the reporting year that are associated with Taxonomy-eligible and Taxonomy-aligned economic activities. For 2025, total capital expenditure amounted to EUR 305 million, comprising additions to property, plant and equipment, intangible assets and right-of-use assets recognised in the consolidated financial statements (see [Notes 8, 7 and 9](#)).

Taxonomy-aligned CapEx during the year is primarily driven by investments in renewable energy technologies (CCM 7.6), including the installation of on-site solar photovoltaic systems and heat pumps. Investments related to energy efficiency improvements (CCM 7.3) remain Taxonomy-eligible;

however, no additions were made to this activity during the reporting year.

For CCM 7.6, additions to installation, machinery and equipment include assets supporting both renewable and non-renewable installation activities. Due to limitations in asset-level classification, only the portion of capital expenditure that can be reasonably associated with renewable energy technologies is included in the Taxonomy CapEx KPI.

All remaining capital expenditure relates to activities that are not covered by the EU Taxonomy and is therefore classified as non-eligible.

All activities represent significantly less than 10% of the CapEx denominator. Accordingly, no expanded technical reassessment was required in 2025.

Operating expenditure (OpEx)

During the reporting period, Odido identified the operating expenditure categories falling within the definition of the EU Taxonomy OpEx denominator in accordance with Section 1.1.3.1 of Annex I to Commission Delegated Regulation (EU) 2021/2178. Based on its 2025 assessment, Odido concluded that no relevant non-capitalised research and development costs, building renovation measures or short-term lease expenses were incurred within the meaning of the Regulation. The only relevant category identified was maintenance and repair related to assets, resulting in a total EU Taxonomy OpEx denominator of approximately EUR 1 million.

Odido evaluated the materiality of this denominator by comparing the aggregate amount of Taxonomy-defined OpEx with Odido's total operating expenditure as presented in the financial statements and by considering the nature of Odido's business model. As the identified Taxonomy-defined OpEx represented only a very limited share of total operating expenditure, and as Odido's Taxonomy-eligible and Taxonomy-aligned activities are primarily capital expenditure-driven, Odido concluded that the EU Taxonomy OpEx denominator is not material.

Accordingly, in line with Article 2(1)(c) and Section 1.1.3.2 of Annex I to the Disclosures Delegated Act, Odido applies the OpEx exemption. The OpEx KPI is therefore not disclosed for the 2025 reporting period.

Odido will continue to monitor the relevance and materiality of these cost categories in future reporting periods. The summary of the KPIs and reported KPIs are provided in the following KPI tables:

Financial year 2025

KPI	Total (€m)	Proportion of Taxonomy eligible activities	Taxonomy aligned activities (€m)	Proportion of Taxonomy aligned activities	Breakdown by environmental objectives of Taxonomy-aligned activities						Proportion of enabling activities	Proportion of transitional activities	Not assessed activities considered non-material	Taxonomy aligned activities in previous financial year 2024 (€m)	Proportion of Taxonomy aligned activities in previous financial year 2024
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity					
Turnover	2,379	1%	-	0%	-	-	-	-	0%	-	-	-	1%	-	-
CapEx	305	2%	-	0%	0%	-	-	-	-	-	0%	0%	2%	-	-
OpEx	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Reported KPI (Turnover)

Financial year 2025

Economic Activities	Code	Taxonomy eligible KPI (Proportion of Taxonomy eligible Turnover/CapEx/OpEx)	Taxonomy aligned KPI (monetary value of Turnover/CapEx/OpEx) (€m)	Taxonomy aligned KPI (Proportion of Taxonomy aligned Turnover,CapEx,OpEx)	Environmental objective of Taxonomy-aligned activities						Enabling activity (E)	Transitional activity (T)	Proportion of Taxonomy aligned in Taxonomy eligible	
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity				
Sale of second-hand goods	CE 5.4	1%	0	0%	-	-	-	-	0%	-	-	-	-	0%
Product-as-a-service and other circular use- and result-oriented service models	CE 5.5	0%	0	0%	-	-	-	-	0%	-	-	-	-	0%
Sum of alignment per objective		-	-	-	-	-	-	-	0%	-	-	-	-	-
Total KPI (Turnover)		1%	0	0%										0%

Reported KPI (CapEx)

Financial year 2025

Economic Activities	Code	Taxonomy eligible KPI (Proportion of Taxonomy eligible Turnover/ CapEx/OpEx)	Taxonomy aligned KPI (monetary value of Turnover/ CapEx/OpEx) (€m)	Taxonomy aligned KPI (Proportion of Taxonomy aligned Turnover,CapEx,OpEx)	Environmental objective of Taxonomy-aligned activities						Enabling activity (E)	Transitional activity (T)	Proportion of Taxonomy aligned in Taxonomy eligible
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	2%	0	0%	0%	-	-	-	-	-	-	-	0%
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0%	0	0%	0%	-	-	-	-	-	-	-	0%
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	0%	0	0%	0%	-	-	-	-	-	-	-	0%
Sum of alignment per objective		-	-	-	0%	0%	0%	0%	0%	0%	-	-	-
Total KPI (CapEx)		2%	0	0%							-	-	0%

Everyone can participate

Own workforce

Managing workforce-related topics

At Odido, employees contribute to the delivery of our services and the company's long-term performance. Workforce-related topics are addressed through employment-related policies, practices, and programmes intended to support fair treatment, inclusion, well-being, and long-term employability across our workforce.

These policies and practices apply to employees across our operations and are structured to identify and manage workforce-related impacts and risks in the context of our activities. They reference respect for human rights and compliance with applicable labour laws and are informed by Odido's Human Rights Statement, which outlines our approach to human rights within our operations and business relationships. In line with this framework, trafficking in human

beings, forced or compulsory labour, and child labour are prohibited within our own workforce.

Employment practices, flexibility and benefits

Employment-related practices address workforce diversity and work-life balance across different life stages. These practices include flexible working arrangements, leave entitlements, and employee benefit schemes.

In addition to statutory leave entitlements, employees may request adjustments to their working hours, working schedules, and/or work location in accordance with the Dutch Flexible Working Act (*Wet flexibel werken*). Requests are submitted through a formal process and are assessed taking into account role requirements and operational considerations.



A hybrid working model is in place under which employees may work remotely within the Netherlands, where the nature of the role and operational requirements permit.

In addition, employees have access to paid parental leave and short-term care leave, as well as additional leave options such as long-term care leave, transition leave, sabbaticals, and unpaid parental leave, in line with applicable policies and legal requirements. These arrangements are intended to support care-giving responsibilities, personal development, and other significant life events, while ensuring continuity of operations.

We provide benefits intended to support financial security and long-term employability, including pension arrangements, insurance coverage related to incapacity for work, and benefits for surviving dependents. All employees also have access to discounts on selected Odido products and services and third-party offers through an employee benefits platform. To support ongoing development, all employees have access to an annual training budget of up to €1,000, and length of service is acknowledged through anniversary schemes.

Diversity, inclusion and equal opportunity

A Diversity and Inclusion Policy has been established to set out the framework for equal opportunity and for addressing risks related to unequal treatment within the workforce. Within this framework, diversity and inclusion are addressed as workforce-related topics relevant to organisational culture, workforce composition, and decision-making processes.

Recruitment practices are supported by structured processes designed to promote consistency and mitigate the risk of bias. Standardised intake forms are used for vacancy and candidate assessments to support objective evaluation, while allowing consideration of individual circumstances where relevant. Where appropriate, external recruitment partners are engaged to broaden access to talent pools, including for leadership and specialist roles.

Employee survey data is used to obtain insights into employee perceptions of inclusion and fairness. Diversity- and inclusion-related questions are incorporated into employee surveys, and responses are analysed, including gender-based analysis. The outcomes inform internal discussions and help identify areas that may require further attention.

In addition, practices are in place to support cultural and family inclusivity. These include the option to swap public holidays and the provision of additional post-birth leave for partners, including those in rainbow and multi-parent families, beyond statutory requirements.



Workforce engagement and raising concerns

Engagement with our workforce takes place through direct interaction, employee surveys, and ongoing dialogue between employees and management. These channels are used to gather insights on working conditions, inclusion, well-being, and overall employee experience. Feedback from these interactions is considered in workforce-related discussions and informs organisational and operational decision-making.

Employees may raise concerns through multiple internal reporting channels, depending on the nature of the issue. Concerns may be addressed directly through line management, through Human

Resources in cases of undesirable behaviour, or through Compliance in cases of suspected business misconduct.

In addition, Odido operates an independent Tell Me Portal, which functions as a whistleblower and escalation channel. The portal is accessible to all employees, external workers, and third parties who have or have had a relationship with Odido. Reports can be submitted confidentially and are handled in accordance with applicable laws and internal procedures.

Reported concerns are reviewed and addressed through established management and compliance processes. Where issues are identified, appropriate follow-up actions are taken in dialogue with the individuals involved, with the aim of maintaining a safe, inclusive, and transparent working environment.

Actions supporting the own workforce

Back to Work programme

The Back to Work programme addresses labour market participation for individuals with a distance to the labour market. In 2025, the programme was continued as part of our approach to social impact within our operations and value chain.

The programme is structured around employment, procurement, and skills development initiatives that support access to work opportunities and employability.

The Back to Work programme focuses on three areas:

- creating employment opportunities;
- strategic procurement with social considerations; and
- supporting youth potential.

Creating employment opportunities

This focus area targets individuals with a distance to the labour market. These include individuals registered in employment support schemes, such as recipients of welfare or unemployment benefits, people with chronic illnesses or disabilities, and individuals experiencing mental health-related challenges.

The programme also includes former elite athletes who have ended their professional sports careers and are transitioning into other forms of employment.

Through a multi-year partnership with NOC*NSF and Team NL@Work, structured programmes are offered that may include guidance, mentorship, and personal development components.

In addition, collaboration takes place with Employer Service Points (WerkgeversServicepunten, WSPs) and regional employment agencies to identify and reach candidates with unemployment or non-earning benefit backgrounds. These partnerships facilitate access to employment opportunities following periods outside the labour market.



During the reporting period, **29** internal hires and **6** external hires were made through the **Back to Work programme**.

Strategic procurement with social impact

Social considerations are incorporated into procurement processes. We engage suppliers certified under national social entrepreneurship frameworks, including the Prestatieladder Socialer Ondernemen (PSO). These certifications provide information on the extent to which organisations create employment opportunities for individuals with a distance to the labour market.

Through procurement from PSO-certified partners, social criteria are integrated into selected supply chain relationships, extending workforce-related considerations beyond our own operations.

Examples of suppliers include Hutten Catering, which provides catering services and employs individuals with a distance to the labour market, and Sign Language Coffee Bar, which offers employment and skills development opportunities to young people with hearing impairments.

These collaborations combine the delivery of goods and services with employment-related social objectives.

Supporting youth potential

In addition to employment-related initiatives, the Back to Work programme includes activities aimed at supporting skills development and well-being among young people.

In 2025, Odido employees contributed to training initiatives for young people seeking careers in digital marketing, including practical training sessions and workshops delivered as part of The Young Digitals programme.

We also support initiatives addressing youth mental health and social well-being, recognising the negative impact of factors such as the pandemic, high-performance pressure and digitalisation. We support initiatives such as Stichting Join Us, which combats youth loneliness, and Stichting MIND Us, which strengthens mental resilience. These collaborations involve multi-year partnerships, financial contributions, and knowledge sharing. As of 2025, this support also includes contributions to the digital platform *In je Bol*, which provides information, guidance, and early support related to youth mental health.



Targets supporting workforce diversity and well-being

To enhance transparency and enable consistent monitoring of selected workforce-related outcomes, Odido has defined a set of targets related to workforce composition, inclusion, and health and safety coverage. These targets are intended to support the implementation of existing employment-related policies and practices and to track progress on areas identified as relevant through internal assessments.

The targets apply to Odido's own workforce and are monitored using headcount-based metrics. Unless otherwise stated, 2024 is used as the base year for

assessing progress and progress is assessed through year-on-year changes in the reported metrics.

Gender representation in the workforce and leadership

Odido has set targets to increase the representation of women across different levels of the organisation. These targets address the total workforce, management, and top management, reflecting the importance of balanced representation at both operational and leadership levels. Odido expects to adjust the scope of these targets from 2026 to focus on the total workforce, sub-top management, and top management. This adjustment represents a definitional refinement only and does not indicate any change in ambition or commitment to gender diversity.

By 2030, Odido aims to achieve:

- 37% women in the total workforce
- 30% women in management
- 35% women in top management

Management is defined as employees with direct reports and responsibility for hiring and dismissal decisions. Top management refers to executive management roles, including the Chief Executive Officer and members of the Executive Committee.

Progress towards these targets is monitored through gender distribution metrics, expressed both as percentages and absolute headcount, covering:

- the total workforce,
- management level,
- top management level.

Health and safety management system coverage

To support workforce well-being and operational continuity, Odido has set a target related to occupational health and safety coverage.

Odido aims to maintain full coverage of its Health & Safety Management System (HSMS), with a target level of 100%, measured against the 2024 base year, with a baseline value of 74%.

Coverage refers to the proportion of the own workforce, including employees and non-employees, that is covered by a HSMS based on ISO 45001.

Progress is monitored on a headcount basis and is reported separately for employees and non-employees where relevant.

Occupational health, safety and well-being

Occupational health and safety forms part of our approach to workforce well-being and operational continuity. The focus of our health and safety management approach is the prevention of work-related accidents and ill health, alongside the gradual expansion and strengthening of the HSMS.

The HSMS is aligned with ISO 45001 principles and is certified for a defined part of operations. While coverage is not yet complete across all legal entities and locations, the system provides a structured framework for risk identification, incident monitoring, and management review processes.

The current scope includes employees and non-employees working on our sites, such as contractors and temporary workers, subject to defined exclusions.

As of the reporting period, HSMS coverage of our own workforce, calculated on a headcount basis, is as follows:

- Employee coverage: 74% (1,641 out of 2,220)
- Site coverage: 18% (26 sites out of 145 sites)

The current ISO 45001 certification scope excludes Odido Retail B.V. All workers within the certified entities, including contractors and temporary workers, fall within the HSMS scope.

A roadmap is in place to expand ISO 45001 alignment across all locations by 2027. This reflects a phased implementation approach rather than a completed state.

Supporting workforce well-being

Our health and safety activities are structured around several interconnected aspects of employee well-being:

- **Feel fit:** Workplace ergonomics and vision care support is provided through a programme delivered by a certified external ergonomist. The programme focuses on physical health and the prevention of work-related strain.
- **Feel balanced:** A mental health programme is available to employees experiencing high workload or challenges in balancing work and personal responsibilities.
- **Feel safe:** Workplace safety is addressed through incident monitoring, regular risk assessments, and preventive measures. In 2025, Emergency Response Team (ERT) activations increased from 18 to 21 incidents. ERT activations include precautionary

responses and minor incidents and do not necessarily involve injuries. During the same reporting period, one recordable minor work-related injury was reported.

- **Feel free:** Psychosocial safety is addressed through training delivered as part of the Odido Way of Working programme. The training covers awareness of undesirable behaviour and respectful workplace conduct. Overall training completion during the reporting period was 55% (2024: 79%). Completion gaps have been identified, particularly among non-employee groups, and follow-up actions are being implemented.

Odido Way of Working training completion rates:

- Overall: 55% (3,034 out of 5,520 active employees and non-employees)
- Employees: 89% (1,918 out of 2,162 active employees)
- Non-employees: 33% (1,116 out of 3,358 active non-employees)
- **Feel better:** Absenteeism management forms part of our broader workforce management approach. At the end of 2025, adjustments were made to the absence management process to strengthen oversight of long-term absenteeism from 2026 onward.



Metrics related to own-workforce

The metrics disclosed below provide insight into workforce composition, health and safety, and selected aspects of diversity. Some metrics are linked to defined targets, while others are disclosed to support transparency and baseline development. Explanatory narrative is provided where relevant.

Measurement methodology and reporting scope

Workforce categories

Workforce data is categorized into two main groups: **Employees** and **Non-Employees**.

The average number of employees and non-employees reported during the year is calculated as the average monthly number of individuals employed by Odido during the reporting period. Unless otherwise stated, workforce figures represent the number of individuals employed by Odido as at 31 December 2025.

Employees

Employees are individuals who have a direct employment contract with Odido. They are classified as follows:

- **Full-time employees** are individuals with a contractual working time of:
 - 38 hours per week for Retail employees employed by Odido Retail B.V.; and
 - 40 hours per week for employees of all other Group companies.
- **Part-time employees** are individuals with a contractual working time of:
 - Less than 38 hours per week for Retail employees employed by Odido Retail B.V.; and
 - Less than 40 hours per week for employees of all other Group companies.

Characteristics of the employees and non-employees

Employees and non-employees by gender	2025					2024			
	Female	Male	Other ¹	Not Disclosed	Total	Female	Male	Other ¹	Total
Employee number (year-end headcount)	650	1,591	1	3	2,245	620	1,412	1	2,033
Average number of employees	659	1,559	1	1	2,220	626	1,414	1	2,041
Average number of non-employees (Contractors and Temporary workers)	82	209	0	1	292	177	417	4	598

1. Gender as specified by the employees themselves

Employees are further classified by contract type as follows:

Permanent contracts: Employees with an employment contract of indefinite duration with Odido.

Temporary contracts: Employees with an employment contract for a fixed term or limited duration with Odido.

Non-employees

Non-employees are individuals who provide services to Odido but do not have a direct employment contract. They are classified as follows:

- **Temporary workers:** Individuals sourced through employment agencies and contracted via a temporary staffing agency rather than directly employed by the company. They are engaged to fulfil specific roles or assignments.
- **Contractors:** Independent professionals (e.g., freelancers, self-employed workers, interim professionals, or secondees) who provide services under contractual agreements for specific projects or assignments.

Management positions

- **Top management:** Top management includes individuals in executive management roles within Odido, consisting of the Chief Executive Officer (CEO) and members of the Executive Committee (ExCo).
- **Managers:** Managers are employees who have at least one direct report within the workforce.



Employees by contract type and gender (year-end headcount)	2025					2024			
	Female	Male	Other ¹	Not Disclosed	Total	Female	Male	Other ¹	Total
Employees with a permanent contract	515	1,233	1	1	1,750	522	1,199	1	1,722
Employees with a temporary contract	135	358	0	2	495	98	213	0	311
Total	650	1,591	1	3	2,245	620	1,412	1	2,033

1 Gender as specified by the employees themselves

Average number of employees by contract type and gender	2025					2024			
	Female	Male	Other ¹	Not Disclosed	Total	Female	Male	Other ¹	Total
Employees with a permanent contract	523	1,230	1	0	1,754	520	1,187	1	1,708
Employees with a temporary contract	135	330	0	1	466	105	228	0	333
Total	659	1,559	1	1	2,220	626	1,414	1	2,041

1 Gender as specified by the employees themselves

Average number of employees by employment type and gender	2025					2024			
	Female	Male	Other ¹	Not Disclosed	Total	Female	Male	Other ¹	Total
Full-time employees	267	996	0	1	1,263	261	997	0	1,258
Part-time employees	392	564	1	0	957	365	417	1	783
Total	659	1,559	1	1	2,220	626	1,414	1	2,041

1 Gender as specified by the employees themselves

	2025	2024
Number of employees who left the company	527	520
Employee turnover rate	24%	25%

Number of employees who left the company

The number of employees who left the company represents the total number of employees whose employment with Odido ended during the reporting period.

Employee turnover rate

The employee turnover rate represents the percentage of employees who leave Odido during the reporting period due to voluntary resignation, dismissal, retirement, or death in service, relative to the average number of employees during the same period.



Diversity metrics

Employees by age and gender (year-end headcount)	2025					2024			
	Female	Male	Other ¹	Not Disclosed	Total	Female	Male	Other ¹	Total
<30	231	507	0	2	740	191	331	0	522
30-50	339	775	0	0	1,114	352	791	0	1,143
>50	80	309	1	1	391	77	290	1	368
Total	650	1,591	1	3	2,245	620	1,412	1	2,033

1 Gender as specified by the employees themselves

Percentage of employees by age and gender (year-end headcount)	2025					2024			
	Female	Male	Other ¹	Not Disclosed	Total	Female	Male	Other ¹	Total
<30	31%	69%	0%	0%	100%	37%	63%	0%	100%
30-50	30%	70%	0%	0%	100%	31%	69%	0%	100%
>50	20%	79%	0%	0%	100%	21%	79%	0%	100%

1 Gender as specified by the employees themselves

Employees in management positions by gender (year-end headcount)	2025					2024			
	Female	Male	Other ¹	Not Disclosed	Total	Female	Male	Other ¹	Total
Number of employees in top management	3	5	0	0	8	4	5	0	9
Percentage of employees in top management	38%	63%	0%	0%	100%	44%	56%	0%	100%
Number of managers in the workforce	51	226	0	0	277	55	213	0	268
Percentage of managers in the workforce	18%	82%	0%	0%	100%	21%	79%	0%	100%

1 Gender as specified by the employees themselves

Work-life balance metrics

Family-related leave by gender	2025					2024			
	Female	Male	Other ¹	Not Disclosed	Total	Female	Male	Other ¹	Total
Number of employees who took family-related leave	96	165	1	0	262	119	154	0	273
Percentage of employees who are entitled to take family-related leave	100%	100%	100%	100%	100%	100%	100%	100%	100%

1 Gender as specified by the employees themselves

Number of employees who took family-related leave

The number of employees who took family-related leave during the reporting period. Family-related leave includes maternity leave, childbirth leave, extended childbirth leave, parental leave (paid and unpaid), adoption or foster care leave, short-term care leave, and long-term care leave.

Percentage of employees who are entitled to take family-related leave

All employees with a direct employment contract with Odido are entitled to take family-related leave.

Health and safety metrics

	2025	2024
Percentage of employees who are covered by the HSMS ¹	74%	74%
Number of recordable work-related accidents for own workforce	1	2
Rate of recordable work-related accidents for own workforce ²	0.3	0.6

1 Not within the scope of the limited assurance.

2 The methodology for calculating the rate of recordable work-related accidents was updated in 2025, including changes to the estimation of hours worked. As a result, the 2024 comparative figure has been revised (previously reported: 0.7).

Percentage of employees who are covered by the HSMS¹

The percentage of the own workforce covered by a Health and Safety Management System (HSMS) based on ISO 45001 during the reporting period.

Number of recordable work-related accidents for own workforce

The number of recordable work-related accidents represents the total number of work-related incidents involving employees and non-employees during the reporting period that result in any of the following: death, days away from work, restricted work, transfer to another job, medical treatment beyond first aid, loss of consciousness, or a significant injury or ill health diagnosed by a physician or other licensed healthcare professional.

Rate of recordable work-related accidents for own workforce

The rate of recordable work-related accidents represents the frequency of recordable work-related accidents relative to the total number of hours worked by the workforce during the reporting period. The rate is calculated as: $\text{Number of recordable work-related accidents} \div \text{total hours worked} \times 1,000,000$. Total hours worked are estimated based on potential working hours (average FTE \times 52 weeks \times 40 hours) adjusted for national holidays, vacation hours taken, and absence hours.

¹ Not within the scope of the limited assurance.





There were no fatalities resulting from work-related accidents or work-related ill health within our workforce or among other workers on our sites in 2025.

In addition, no days were lost due to recordable work-related accidents or work-related ill health, and no cases of recordable work-related ill health occurred in 2025.





Workers in the value chain

Managing value chain labour and human rights risks

Odido operates within a complex global value chain that includes the sourcing of network infrastructure, electronic equipment, logistics services, and outsourced activities across multiple geographies. Within this context, we recognise that workers in upstream and outsourced activities may be exposed to heightened human rights and labour-related risks, particularly in raw material extraction, manufacturing, and logistics.

Our approach to managing material impacts, risks, and opportunities related to workers in the value chain is supported by three interrelated policy instruments: the Sustainable Procurement Policy, the Supplier Code of Conduct, and the Human Rights Statement. Together, these instruments set expectations for suppliers and business partners and provide the foundation for due diligence, risk prioritisation, and engagement.

Policies and expectations for suppliers and business partners

The Sustainable Procurement Policy applies across all brands, product groups, and outsourced service partners. It integrates sustainability considerations into supplier selection and contract renewal processes alongside cost and quality criteria. Requests for Proposals include a sustainability weighting of 10–20% of the total evaluation score, depending on the ESG risk profile of the goods or services procured. This assessment is based on standardised and category-specific ESG criteria covering human rights, labour conditions, and environmental performance. Responsibility for implementation and oversight rests with the Head of Procurement & Wholesale.

The Supplier Code of Conduct establishes minimum requirements related to business ethics, environmental compliance, and social standards. It is aligned with internationally recognised frameworks, including the UN Global Compact, the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and ILO labour standards. The Code addresses, among other topics, the prohibition of child labour and forced or compulsory labour. Acceptance of the Code is mandatory for most suppliers, with

limited exceptions for specific categories such as public authorities, interconnect and roaming partners, landlords for antenna sites, and suppliers with equivalent codes of conduct aligned to the same standards.

In 2025, we introduced our Human Rights Statement, which articulates our commitment to respecting human rights in our operations and business relationships. The statement references the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. It applies to employees, contractors, and business partners and describes Odido's position regarding human rights while providing a comprehensive overview of how we incorporate human rights considerations into our decision-making processes, operations, and business relationships. In line with this framework, trafficking in human beings, forced or compulsory labour, and child labour are prohibited and not tolerated within our value chain. The operationalisation of these commitments across the value chain continues to develop.

Identifying and prioritising risks in the value chain

In 2025, we conducted a comprehensive value chain risk assessment aligned with the OECD Guidelines for Multinational Enterprises. This assessment identified salient human rights risks, including inadequate working conditions, child labour, forced labour, and environmental impacts affecting communities, particularly in raw material extraction and upstream manufacturing.

Product categories assessed as having higher upstream risk included smartphones, routers, fibre-optic cables, antennas, and data centre equipment. While Odido does not consider itself to have caused or contributed to these risks, we recognise our linkage to them through procurement activities and the responsibility to use available leverage to influence improvement.

Due diligence, audits and corrective actions

A central element of our due diligence approach is participation in the Joint Alliance for CSR (JAC), an industry initiative through which telecommunications operators collaborate to conduct supplier audits, share findings, and coordinate corrective actions.

In 2025, we conducted four ESG/CSR audits and reviewed one additional Responsible Business Alliance audit report through JAC. All members of JAC collectively conducted 151 audits and surveys across the shared supply chain, resulting in 794 corrective action plans. The majority of findings related to health and safety, working hours, environment, and business ethics. China, Vietnam and India were the top countries audited. Corrective actions are monitored through supplier follow-up processes coordinated within the JAC framework.

Based on the outcomes of the risk assessment, we plan to focus the 2026 JAC audit programme on selected higher-risk product categories, including optical fibre cables and customer-premises equipment.

In addition, Odido contributed in 2025 to the JAC Due Diligence Working Group, which aims to strengthen aligned due diligence practices across the sector by advancing risk assessment, enhancing the JAC audit process, strengthening supplier engagement and improving grievance and remediation mechanisms.



Collaborative initiatives addressing high-risk issues

Beyond audits and corrective action processes, we have begun to engage in longer-term initiatives aimed at addressing specific high-risk issues within the value chain. Since 2025, Odido has partnered with Save the Children Switzerland and The Centre for Child Rights and Business through the Child Rights Action Hub DRC, a multi-stakeholder initiative supporting children

and youth involved in artisanal and small-scale cobalt mining in the Democratic Republic of Congo.

Through this initiative, identified cases of child labour are referred to the Action Hub, where affected children receive support including living stipends, school fees, medical care, and psychosocial assistance. Odido has made a three-year commitment to financially support the project alongside other telecommunications companies as part of its duty of care in relation to child labour risks in its supply chain. Further information on the Child Rights Action Hub DRC is available on the initiative’s website.

Targets supporting responsible value chain practices

To strengthen oversight and transparency over time, Odido has set the following targets related to workers in the value chain:

- to increase coverage of supplier spend with active third-party ESG ratings to 80% by 2030, from a 2023 baseline of 53%, focusing on the top 300 suppliers by spend across network infrastructure and physical product categories;
- to audit 80% of suppliers identified as high-risk by 2030, from a 2024 baseline of 22%,

using recognised third-party frameworks such as JAC;

- to implement five long-term human rights initiatives across the value chain by 2030, with two initiatives in place as of 2025 and additional programmes under development, from a baseline of 1 initiative in 2024.

Metrics related to workers in the value chain

The metrics disclosed below provide insight into Odido’s supplier base, risk exposure and due diligence activities related to workers in the value chain. They reflect the current focus of Odido’s supplier due diligence approach, which is primarily based on risk identification, audit coverage and corrective action processes.

Some metrics are linked to defined targets, while others are disclosed to support transparency and the development of baselines over time. Where relevant, limitations and methodological assumptions are described. As data availability and systems continue to develop, Odido expects to further refine the scope and consistency of these metrics in future reporting periods.

	2025	2024
Number of suppliers and partners that Odido had a direct spend with in the reporting year	2,316	2,450
Percentage of Odido's total spend to suppliers with an active global ESG rating	72%	63%
Number of high risk suppliers identified in internal risk assessment	9	9
Percentage of identified high risk suppliers audited by Odido	44%	22%
Total number of self-conducted ESG audits by Odido	4	3
Number of CAPs coming from ESG audits	23	24
Percentage of CAPs closed from that audit year which are closed or not overdue > 12 months	100%	100%
Ongoing number of mitigation mechanisms or initiatives to improve human rights in the value chain	2	1

Supplier spend covered by active ESG ratings

This metric measures the percentage of Odido’s total supplier spend that is covered by an active third-party ESG rating. The calculation is based on spend with the top 300 suppliers by value, which represents 95% of total procurement spend.

An “active ESG rating” refers to suppliers that proactively participate in a recognised ESG assessment process by completing an ESG questionnaire. Currently, applicable rating providers include EcoVadis and the Corporate Sustainability Assessment (CSA) of S&P Global. Additional rating

providers may be included in the future, with any changes disclosed transparently.

The metric reflects coverage rather than performance: the actual ESG rating score is not considered. The supplier list and spend composition may change year-to-year due to supplier on-boarding, off-boarding and changes in spend patterns.

Auditing of high-risk suppliers

This metric measures the percentage of suppliers classified as high-risk that have undergone ESG audit conducted by Odido, primarily through participation



in the Joint Alliance for CSR (JAC). The percentage is calculated as the number of identified high-risk suppliers audited during the reporting period divided by the total number of identified high-risk suppliers during the same period.

High-risk suppliers are identified through internal risk assessments that consider factors such as product category, geographic location and industry risk profiles. The population of high-risk suppliers may change over time due to updates in risk assessments, changes in the supplier base and shifts in procurement volumes.

Audits focus on identifying non-conformities related to labour conditions, health and safety, human rights and environmental management. Findings are addressed through corrective action plans (CAP) that are monitored through follow-up processes coordinated within the JAC framework.

Human rights mitigation mechanisms and initiatives

This metric tracks the number of ongoing mitigation mechanisms or initiatives aimed at improving human rights conditions within Odido's value chain.

These initiatives typically operate over multiple years and are designed to address structural risks rather than isolated incidents.

Mechanisms and initiatives may take different forms, including ESG audit programmes, supplier engagement and capacity-building, collaboration with non-governmental organisations, grievance and whistleblower mechanisms, and participation in industry-wide initiatives. Some initiatives are implemented directly by Odido, while others are conducted collaboratively through sector partnerships. Current initiatives include participation in the JAC audit programme and collaboration with Save the Children Switzerland and The Centre for Child Rights and Business through the Child Rights Action Hub DRC.

The metric reflects the existence and continuation of initiatives rather than their outcomes. Effectiveness is monitored through qualitative assessments, audit findings and engagement outcomes, recognising that measurable impact may only become visible over longer time horizons.

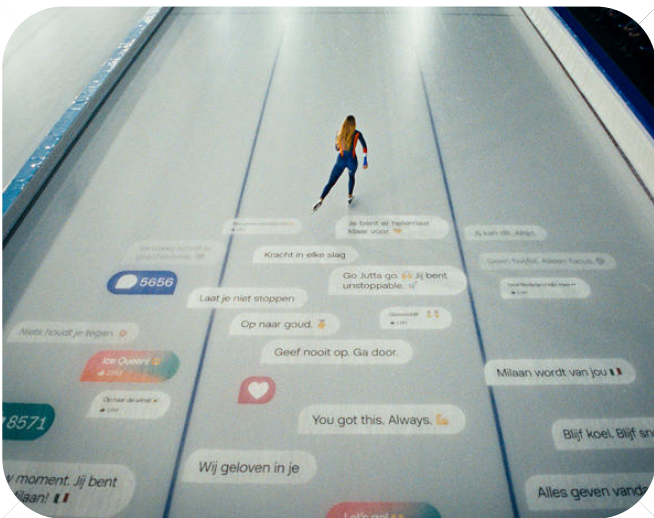


Consumers and end-users

Managing consumer and end-user-related topics

Odido's approach to consumers and end-users is embedded in its core business operations and service delivery processes. As a provider of regulated telecommunications services in the Netherlands, Odido operates within a sector-specific regulatory framework addressing service continuity, access, consumer protection, data protection and transparency.

Consumer- and end-user-related considerations are incorporated into operational frameworks, contractual arrangements, internal procedures, and network and service management processes, rather than being governed by a stand-alone policy.



Customer satisfaction is monitored across consumer and business segments using the Net Promoter Score (NPS), complemented by customer feedback mechanisms and research activities. These inputs are reviewed as part of product, service, and customer journey management processes.

Access to connectivity and digital participation

Odido's consumer offering focuses on providing nationwide access to mobile and fixed connectivity in

the Netherlands. Network investments support Odido's ambition to enable broad participation in a digitalising society and are directed at coverage, capacity and quality. This includes the continued roll-out of 5G and the operation and maintenance of fixed and mobile networks across urban and rural areas.

Network development is an ongoing process, influenced by increasing data usage and the growing number of connected devices. Investments in network upgrades, resilience and coverage expansion are therefore made to maintain service reliability and availability for consumers and end-users over time.

Network quality, availability and customer experience

Network performance is assessed through a combination of internal monitoring systems and external benchmarking. External assessments provide independent reference points regarding network quality, speed, and customer experience at a specific point in time.

In 2025, external assessments included the following outcomes:

- Outstanding Fixed Line Network Test in the Netherlands (Umlaut, February 2025)
- Best 5G network in the Netherlands (Opensignal, March 2025)
- Fastest Mobile Network in the Netherlands (Ookla, March 2025)
- Winner of the Telecompaper Customer Choice Award 2025 – Broadband (Customer Choice Award, June 2025)

These outcomes reflect performance at a specific point in time and do not remove the need for continued investment and improvement. Odido therefore focuses on maintaining high levels of service availability and quality through ongoing network monitoring, maintenance and capacity planning.

Digital inclusion and customer well-being initiatives

In addition to infrastructure investments, Odido implements selected initiatives aimed at supporting digital inclusion and promoting safe and responsible use of digital technologies. These initiatives, delivered in partnership with external organisations, focus on awareness, guidance and access and form part of Odido's approach to addressing potential negative societal impacts associated with digitalisation.

In 2025, key initiatives included:

- **Use your voice against loneliness:** In partnership with MIND Us and Join Us, Odido supported a public awareness campaign during Mental Health Awareness Week (2–8 June 2025). The campaign encouraged dialogue on loneliness among young people and directed audiences to partner-developed tools providing information on recognising early signs of mental health issues and ways to seek or offer support. The campaign was delivered across multiple media channels and remains accessible via a dedicated website.
- **Start slim:** Together with the non-profit organisation Internet Matters, Odido contributed to the development of an online platform providing parents with guidance on screen time, online behaviour and digital risks. The initiative supports age-appropriate conversations between parents and children and promotes safer and more informed digital use.
- **Inclusive sport initiatives:** As part of broader engagement in inclusive sports, Odido supported initiatives aimed at increasing access to sports for children with physical disabilities or chronic illnesses. These included the annual Esther Vergeer Sports Camp and the TeamNL Paralympic Talent Days, which focus on participation, development and talent identification.

These initiatives form part of Odido’s broader engagement with consumers and end-users beyond the provision of connectivity. Odido continues to assess how such initiatives can complement its core services while remaining aligned with its operational focus.

Targets supporting access, availability and inclusion

To support reliable access to connectivity and digital participation, Odido has defined a set of targets related to network coverage, service availability and digital inclusion. These targets apply to Odido’s customer services in the Netherlands and are monitored using technical performance indicators and programme reach metrics.

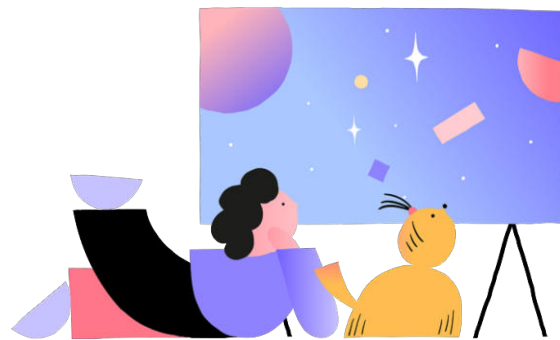
Network coverage and availability targets

Odido has set the following targets related to infrastructure coverage and service reliability:

- Expand fibre footprint in the Netherlands to 90.7% of households by 2030 (base year: 2024)

- Maintain 5G population coverage at 99.8% by 2030 (base year: 2024)
- Maintain fixed service availability at 99.9% by 2030 (base year: 2024)
- Maintain mobile service availability at 99.7% by 2030 (base year: 2024)

These targets reflect the importance of service continuity and network resilience for consumers and end-users and are aligned with operational performance management processes.



Digital inclusion target

In addition to network-related targets, Odido aims to reach 25,000 people yearly through digital inclusion initiatives that support participation in a digitalising society. This target relates to initiatives focused on access, awareness and well-being.

Progress is monitored based on the estimated number of people reached through initiatives supported or implemented by Odido. Methodologies may evolve over time as data collection and impact measurement practices develop.

Metrics related to consumers and end-users

The metrics disclosed below provide insight into network coverage, service availability, performance quality and the reach of selected digital inclusion initiatives. Some metrics are directly linked to defined targets, while others are disclosed to support transparency and year-on-year comparability. As data systems and methodologies continue to develop, Odido expects to further refine these metrics over time.

	2025	2024
Network availability Mobile Dutch population (%)	99.8%	99.7%
Network availability Fixed Dutch population (%)	99.9%	99.9%
Fiber footprint percentage (%)	88.6%	85.45%
5G population coverage (%)	99.8%	93.4%
Service availability fixed (%)	99.9%	99.9%
Service availability mobile (%)	99.8%	99.7%
Ookla Mobile speed test score (Mbits) ¹	76.3	193
Ookla Fixed speed test score (Mbits) ¹	72.2	255
Umlaut grade - mobile	987	987
Umlaut grade - fixed	981	964
Number of people reached with our digital inclusion initiatives ²	1,940,860	58,945

1 In 2025, Ookla updated its Speed Score methodology to include latency and a normalized global scoring model (0–100 scale); therefore, scores are not directly comparable with previous years and lower values reflect the methodology change rather than a decline in performance.

2 The significant increase in the number of people reached with digital inclusion initiatives in 2025 (1,940,860 compared with 58,945 in 2024) is primarily attributable to the Use your voice against loneliness campaign.

Fibre footprint percentage

This metric measures the percentage of households in the Netherlands that Odido can supply with fibre-based fixed connectivity. Coverage is determined based on network availability and access through owned or wholesale infrastructure. The metric reflects potential availability rather than actual customer take-up.

Fixed service availability

This metric measures the percentage of time that Odido’s fixed network services are operational and available to consumers over the reporting period. Availability is calculated based on network uptime data and reflects service continuity, taking into account both planned and unplanned interruptions.



5G population coverage

This metric measures the percentage of the Dutch population that has access to Odido’s 5G mobile network, based on network coverage modelling. It reflects geographic and population coverage and does not imply guaranteed indoor coverage or service quality at individual locations.

Mobile service availability

This metric measures the percentage of time that Odido’s mobile network services are operational and available to consumers over the reporting period. Availability is determined based on the uptime of radio network elements and core network components and reflects overall service reliability rather than individual user experience.

People reached through digital inclusion initiatives

This metric measures the estimated number of individuals reached through digital inclusion and well-being initiatives supported or implemented by Odido. It includes participants and audiences reached through campaigns, platforms or activities aimed at supporting digital participation, awareness or social well-being.

The metric reflects reach rather than outcomes. Methodologies are based on partner reporting and campaign estimates and may evolve as impact measurement practices develop.

Smart for society

Business conduct

Managing business conduct and corporate culture

At Odido, responsible business conduct is an integral part of how the organisation operates and makes decisions. Our approach to business conduct is anchored in a value-based corporate culture that emphasises integrity, trust, accountability and compliance with applicable laws and regulations. These principles support long-term value creation, protect our reputation and guide behaviour across the organisation.

Our approach is formalised through an Integrity Policy Framework, with the Code of Conduct as its central element. The Code of Conduct sets expectations for ethical behaviour and applies to employees, members of the administrative, management and supervisory bodies, external hires, and other relevant third parties. It is supported by a set of topic-specific policies covering areas such as anti-corruption and bribery, conflicts of interest, whistleblower protection, diversity and inclusion, environmental responsibility and compliance with laws and regulations.

Information on business conduct policies, training and reporting channels is made accessible to employees through a dedicated compliance page on the internal intranet platform (Odido Wereld).

Governance and oversight of business conduct

Oversight of business conduct, integrity and compliance-related matters is embedded within Odido's governance structure. The administrative, management and supervisory bodies receive regular updates on compliance-related topics, including significant risks, incidents and mitigation measures. While the Management Board remains end-responsible, operational responsibility for the implementation and monitoring of business conduct policies lies with the Governance, Risk & Compliance (GRC) function, working in close cooperation with



Human Resources, Legal & Regulatory and relevant business functions.

Business conduct risks are identified and assessed as part of Odido's broader risk management and internal control processes.

Policies related to business conduct

Odido maintains policies designed to prevent, detect and address unethical behaviour, including corruption, bribery and conflicts of interest. The Integrity Policy Framework includes, among others, the Code of Conduct, the Policy on Avoiding Corruption and Other Conflicts of Interest, and supporting policies addressing whistleblower protection, fair competition and responsible business practices. These policies are aligned with applicable Dutch legislation, such as the Dutch Criminal Code and whistleblower protection laws, and reference internationally recognised standards, including the United Nations Convention Against Corruption (UNCAC).

Particular attention is given to functions that may be exposed to higher corruption and bribery risks, such as procurement, enterprise sales, legal and governance functions. Policies applicable to these areas include enhanced internal controls, risk-based due diligence and monitoring activities.

Odido prohibits the offering, promising or granting of improper benefits to public officials or private sector decision-makers, as well as the acceptance of benefits that could influence business decisions. The company also adheres to rules on fair competition, public procurement, trade controls, embargoes, transparent financial reporting and anti-money laundering. Sponsorships and donations are subject to internal approval processes and must deliver a clear business-related purpose. Political contributions are only permitted within the boundaries of applicable laws.

Actions and implementation

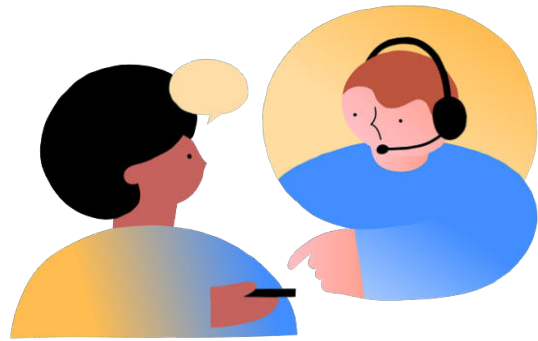
The implementation of business conduct policies is supported by a combination of preventive and detective measures.

A core element is the Odido Way of Working training programme, which is mandatory for employees and contractors. The programme covers topics including the Code of Conduct, cybersecurity, data protection, privacy and diversity and inclusion.

Training is completed during on-boarding and followed by annual recertification. Completion rates are monitored through internal dashboards and reported on a regular basis to management.

Odido has also established reporting channels to enable employees and external stakeholders to raise concerns or seek guidance. These include:

- the "Ask Me!" inbox, which provides a central contact point for compliance-related questions; and
- the "Tell Me!" whistleblower portal, which allows confidential or anonymous reporting of suspected misconduct or violations of internal policies or legal obligations. Matters in scope include, but are not limited to: ethical and legal violations, safety and environmental risks, misuse of resources, and information integrity issues.



Reports submitted through the whistleblower portal are subject to a structured handling process, including a plausibility assessment and, where required, a formal investigation conducted independently from line management. Investigations are supported by trained personnel and may involve the GRC function, Human Resources and Legal & Regulatory. Measures are in place to protect reporters against retaliation, in line with applicable whistleblower protection legislation. Reporters are informed of the status and outcome of investigations where legally permissible.

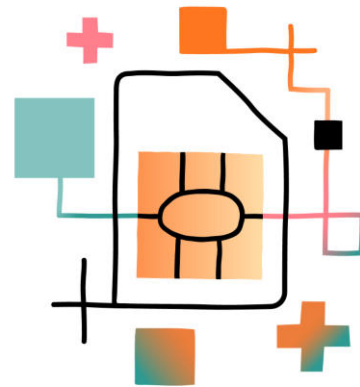
Transparency and oversight are integral to the handling of reported concerns. Outcomes from investigations, including identified issues and corrective measures where applicable, are documented and reported through Odido's regular compliance reporting processes. Relevant information is shared with the administrative, management and supervisory bodies via quarterly compliance reports and discussed in appropriate governance forums, including compliance- and audit-related meetings. This supports oversight of business conduct risks and the consistent application of corrective actions.



Metrics and targets related to business conduct

To support monitoring of key preventive measures, Odido discloses selected metrics related to training coverage and incidents of corruption or bribery.

Odido has set a target to ensure that at least 80% of employees in functions identified as having elevated corruption and bribery risk complete anti-corruption and anti-bribery training. Functions-at-risk include procurement, enterprise sales, contract management, legal and governance functions, as well as members of the administrative, management and supervisory bodies. Progress against this target is monitored through the Learning Management System and reviewed periodically to identify gaps in coverage.



Training coverage for functions-at-risk is disclosed annually. The training programme was not yet in place in prior years and was introduced during the reporting period. By the end of 2025, training coverage for the target group reached 88%. This metric represents the percentage of employees in functions identified as having elevated exposure to corruption and bribery risks who have completed the anti-corruption and anti-bribery training during the reporting period. Training completion is tracked through the Learning Management System.

Odido also discloses information on confirmed incidents of corruption and bribery. During the reporting period and the comparative periods presented, no convictions for violations of anti-corruption or anti-bribery laws were recorded, and no fines or penalties were imposed.

Cybersecurity, data & information protection

Managing cybersecurity, data and information protection

Cybersecurity, data and information protection are managed within Odido's enterprise risk management framework and are considered relevant to business continuity, regulatory compliance and stakeholder trust. Oversight of security- and privacy-related risks is exercised by the Executive Committee (ExCo) and supported by the Risk Management Committee, which is chaired by the Chief Financial Officer and supported by the Head of Governance, Risk and Compliance as secretary.

The Governance, Risk & Compliance (GRC) function supports these bodies by coordinating risk management activities related to cybersecurity, privacy and data protection. This includes risk identification, assessment, monitoring and reporting. The Management Board oversees the implementation of relevant policies and the allocation of resources in response to identified risks.

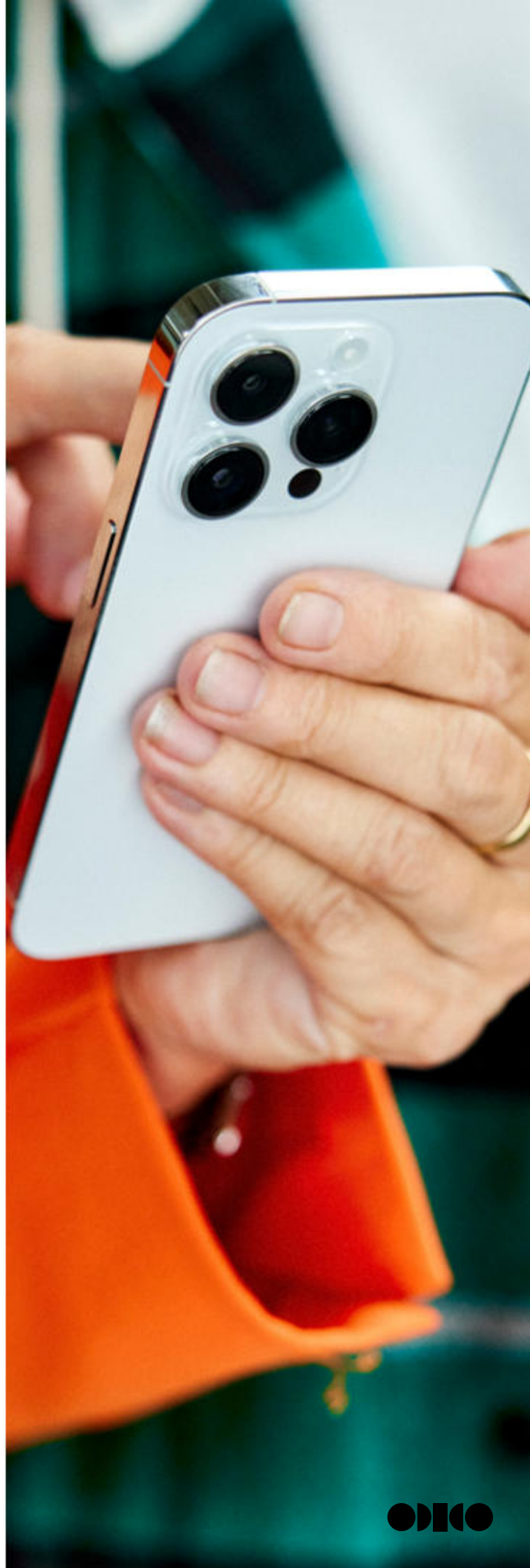
Responsibilities are distributed across the organisation. Employees are expected to comply with security and data protection principles and to report identified risks or incidents. Managers are responsible for integrating security and privacy considerations into business processes and operational decision-making.

Risk management and oversight

Cybersecurity and privacy risks are managed through a structured risk management process that includes risk identification, analysis, evaluation and mitigation. Risks may be identified through internal audits, incident reporting, risk workshops and management interviews.

Risks assessed as higher priority are included in the Risk Report and reviewed quarterly by the Risk Management Committee. The committee monitors mitigation progress and approves material changes to mitigation plans. The Risk Report is subsequently shared with the Executive Committee and discussed with the Audit Committee and the Steering Committee as part of broader governance and assurance processes.

Privacy-related risks primarily relate to the non-compliant processing of personal data, which may



result in harm to individuals, regulatory scrutiny or reputational impact. These risks are managed through a Data Protection Policy Framework and supporting activities, including data protection impact assessments, maintenance of Records of Processing Activities, monitoring of data breaches and engagement with the Dutch Data Protection Authority where applicable. Oversight is supported by the Data Protection Officer in cooperation with the GRC function.

Policies and standards

Cybersecurity and information protection are supported by an Information Security Policy Framework, which defines requirements for protecting information assets and references recognised standards and regulatory requirements, including ISO/IEC 27001, NIST 800-53 and GDPR.

The policy framework applies to Odido's own operations and is extended to suppliers and business partners through contractual arrangements, including security requirements, data processing agreements and audit rights. Documented exclusions apply to non-critical legacy systems that are in the process of being decommissioned.

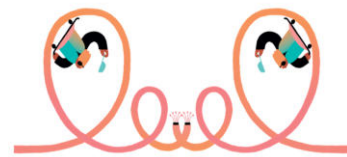
Actions to manage cybersecurity and data protection risks

Cybersecurity, data and information protection risks are addressed through structured risk mitigation plans. Where mitigation is required, actions are defined, assigned to an owner and monitored by designated risk officers. Oversight of significant risks and mitigation actions is maintained through the Risk Management Committee.

Actions implemented during the reporting period focused on maintaining and strengthening existing controls, procedures and monitoring mechanisms within the Information Security Policy Framework and the Data Protection Policy Framework. These actions were implemented through existing operational processes and resources, supported by the Governance, Risk and Compliance function.

Training and awareness form a recurring element of the approach. Employees are required to complete mandatory security and data protection training, including annual refresher training. Training content is reviewed annually to ensure alignment with applicable standards and regulatory requirements.

In addition, during the reporting period, Odido registered as a participant of the Mutually Agreed Norms for Routing Security (MANRS) initiative. MANRS is a global, industry-led programme aimed at reducing common routing threats that affect the stability and security of the core infrastructure of the internet. Participation reflects Odido's commitment to contributing to collective efforts to strengthen internet routing security beyond its own network boundaries.



Targets related to cybersecurity and data protection

Odido has defined a target related to security and data protection training coverage. The target supports the objectives of the Information Security Policy Framework and the Data Protection Framework and was developed with input from relevant internal functions.

Odido aims to maintain at least 80% of its workforce involved in its operations completing the Odido Way of Working e-learning on security and data protection each year through to 2030, from a 2024 baseline of 84%.

For other aspects of cybersecurity and data protection where formal targets have not been defined, effectiveness is monitored through risk assessments, internal audits and incident reporting.

Metrics related to cybersecurity, data and information protection

The metrics disclosed below provide insight into selected aspects of Odido's cybersecurity and data protection practices. In defining these metrics, Odido has applied selected indicators from the Sustainability Accounting Standards Board (SASB) standards relevant to the telecommunications sector, reflecting their focus on financially material risks related to data security and customer privacy. The metrics focus on workforce awareness and control effectiveness rather than on incident volumes or financial exposure.

SASB Topic	SASB Code	Metric	2025	2024
Data Security	TC-TL-230a.1	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of customers affected	0	0
Data Privacy	TC-TL-220a.2	Number of customers whose information is used for secondary purposes	The use of customer data is specified in our Privacy Statement on https://www.odido.nl/privacy	The use of customer data is specified in our Privacy Statement on https://www.odido.nl/privacy
Data Privacy	TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	EUR 1,518,750 ¹	EUR 175,000 ²
Data Privacy	TC-TL-220a.4	(1) Number of law enforcement requests for customer information, (2) number of customers whose information was requested, (3) percentage resulting in disclosure	Odido handles law enforcement requests under Dutch Law, in specific telecommunications law and Besluit beveiliging gegevens telecommunicatie (Telecommunications Data Security Decree). Odido is not at liberty to disclose or share information about these requests.	Odido handles law enforcement requests under Dutch Law, in specific telecommunications law and Besluit beveiliging gegevens telecommunicatie (Telecommunications Data Security Decree). Odido is not at liberty to disclose or share information about these requests.

1 In 2025, the Netherlands Authority for Digital Infrastructure (RDI) imposed a fine of EUR 1,518,750 on Odido following an investigation into the security of its lawful interception system, which found that certain security features did not fully meet legal requirements. Measures have since been implemented to address the risks of unauthorized access.

2 The Rijksinspectie Digitale Infrastructuur (RDI) has imposed a fine of EUR 175,000 on Odido for the internal processing of traffic data in a manner that did not comply with the Telecommunicatiewet (Telecommunications Act). This processing was part of a collaborative project with the Centraal Bureau voor de Statistiek (CBS) aimed at developing an algorithm to provide information on the movement of large groups of people. No raw traffic data was shared with CBS, the violation occurred from early 2018 to late 2019, and the violation did not result in serious consequences or realized risks. The collaborative project with CBS ended in early 2020.

Following the reporting period end, a cybersecurity incident occurred in February 2026. For further information on the nature, magnitude and mitigating actions undertaken refer to risks relating to data privacy as disclosed in the [Risk and Opportunity Management](#) section (see page 26).

Ongoing improvements to the data protection and security environment were implemented during 2025 in response to identified risks, operational experience and regulatory developments. These improvements are reflected in updates to controls, processes and monitoring activities within the existing cybersecurity and data protection framework.

	2025	2024
Percentage of Odido workforce trained on security & data protection (Odido's Way of Working training)	89	84

Percentage of workforce trained on security and data protection

This metric measures the proportion of Odido's workforce that completed mandatory security and data protection training during the reporting period. The training is delivered through the Odido Way

of Working e-learning module and covers topics including the Code of Conduct, cybersecurity, data protection, privacy, and diversity and inclusion.

The metric is calculated as the percentage of assigned internal employees who completed the training, based on Learning Management System records as at year-end.



Sustainable innovation & technology

Managing sustainable innovation and technology initiatives

As part of its broader responsible business approach, Odido participates in a focused set of initiatives related to technology-based solutions addressing societal and environmental topics. These activities are grouped under Sustainable Innovation and Technology and reflect Odido's role as a connectivity and technology partner in collaborative initiatives.

Odido's involvement in these initiatives is primarily enabling in nature. The company does not generally develop, own, or commercialise the underlying technologies. Support may include the provision of connectivity services, selected technological capabilities, technical or strategic expertise, and visibility through existing communication channels.

Governance arrangements are established to provide oversight and structured decision-making. A cross-functional group prepares the bi-monthly Steering Committee, ensuring initiatives are assessed and that relevant input from across the business is incorporated. The Steering Committee, chaired by the CFO and attended by the CCO Enterprise, reviews initiatives and decides whether and how to support them. Progress and key developments are reported to the ESG Committee.

Scope and nature of engagement

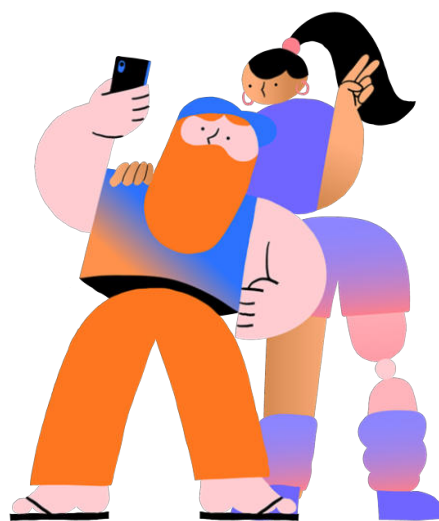
The initiatives supported under Sustainable Innovation and Technology are partner-led and typically address themes such as inclusion, accessibility, renewable energy, sustainable mobility, and resource efficiency. Odido's role is primarily enabling in nature rather than outcome-driven. Societal and environmental impacts are generated through the partners' technologies and activities, while Odido contributes through the provision of connectivity, technological capabilities, or expertise.

Engagement focuses on initiatives that align with selected sustainability themes and where network and technology capabilities are relevant to the partner's objectives. Support is assessed on a case-by-case basis.

Given the enabling role and limited operational control, impact management is proportionate

and predominantly qualitative. Monitoring centres on the type of support provided, thematic alignment, governance oversight, and ongoing partner engagement, rather than on quantified societal or environmental outcomes or financial return indicators.

These engagements also provide insight into practical applications of connectivity and digital technologies, which may inform internal knowledge development and future considerations.



Actions during the reporting period

During 2025, Odido supported nine sustainable innovation initiatives reflecting different applications of connectivity and technology in societal and environmental contexts. These initiatives included solutions aimed at:

- improving mobility and independence for people with physical disabilities;
- advancing renewable energy generation;
- enabling low-emission logistics in remote areas;
- exploring autonomous systems for cleaner urban environments;
- supporting modular robotics designed to lower barriers to automation;
- improving mobile connectivity for mission-critical communications; and
- enhancing digital adoption in hospitals and care facilities.

These initiatives illustrate the range of engagements undertaken as part of Sustainable Innovation and Technology initiatives during the reporting period.

They represent selected examples of partner-led projects supported in 2025 and do not constitute a comprehensive portfolio or a commitment to address all sustainability-related topics.

For 2025, we have prioritized five gems to actively support:

Yumen Bionics: Empowering people with disabilities through inclusive technology

Yumen Bionics is transforming mobility solutions with wearable robotic technology designed to empower individuals with physical disabilities. Their cutting-edge assistive devices enhance independence, restoring dignity and quality of life.

To learn more, visit <https://www.odido.nl/zakelijk/oplossingen/5g/yumen>

Weco energy: Pioneering renewable power solutions

Weco Energy is revolutionizing sustainable energy by harnessing ocean waves to generate 100% renewable power. Their innovative approach supports the transition to cleaner energy systems worldwide.

To learn more, visit <https://www.odido.nl/zakelijk/oplossingen/5g/weco>

Drone delivery services: Shaping green logistics through drone technology

Drone Delivery Services is developing innovative, sustainable drone solutions to improve accessibility in sparsely populated areas of the Netherlands. By delivering urgent medical supplies and reducing reliance on traditional transport, their technology lowers emissions, eases traffic, and enhances quality of life, demonstrating how technological innovation can drive both environmental and societal impact.

To learn more, visit <https://www.odido.nl/zakelijk/oplossingen/5g/drone-delivery-services>

Roboat: Autonomous vessels for cleaner, smarter cities

Roboat is developing autonomous vessels that address urban mobility challenges, from waste collection and package delivery to dynamic infrastructure solutions. By unlocking the potential of city waterways, Roboat is pioneering a smarter, more sustainable approach to urban transport. Beyond transportation, its applications include waste collection to reduce pollution, monitoring water quality to promote sustainability, and even serving as a dynamic infrastructure solution for flood prone areas.

To learn more, visit <https://www.odido.nl/zakelijk/oplossingen/5g/roboat>

Avular: Redefining robotics for a smarter, more connected world

Avular is redefining robotics by developing modular, user-friendly robotic systems for industries such as agriculture, logistics, and industrial automation. Their cutting-edge platforms enable businesses to integrate robotics efficiently without requiring extensive expertise.

To learn more, visit <https://www.odido.nl/zakelijk/oplossingen/5g/avular>

Targets supporting sustainable innovation and technology

To support transparency and consistency over time, Odido has defined a limited activity-based target for Sustainable Innovation and Technology. The target is intended to provide insight into the scale and characteristics of Odido's engagement rather than to quantify downstream societal or environmental outcomes.

Odido aims to scale its portfolio of sustainable innovation initiatives by leveraging its connectivity, knowledge and expertise to support partner-led solutions that address societal and environmental challenges. Using 2024 as the base year, with a baseline of 5 initiatives, Odido targets 15 initiatives by 2030. This target is cumulative in nature: by 2030, a total of 15 different initiatives will have been supported for at least one year since the 2024 baseline year. Progress is tracked through a defined subset of initiatives internally classified as "gems".

Metrics related to sustainable innovation and technology

The metrics disclosed below provide insight into the number and characteristics of sustainable innovation initiatives supported by Odido. They are designed to reflect the scale and focus of Odido’s involvement rather than to measure the societal or environmental

outcomes of partner-led activities. Methodologies, scope definitions and assumptions are documented to support consistency and verifiability.

	2025	2024
Number of sustainability innovation initiatives involved (inspiring pioneers)	9	25
Number of sustainability innovation initiatives that Odido actively support (gems)	5	5

Number of sustainable innovation initiatives actively supported (“gems”)

This metric measures the number of sustainable innovation initiatives that Odido has actively supported through access to connectivity, technology, products, exposure, knowledge sharing and/or in-house expertise since 2024 for at least one year.

Initiatives counted under this metric:

- serve as a proof point of the relevance and value of Odido’s network and expertise for key stakeholders, including employees, customers, business partners and (potential) investors; and
- are formally identified as “gems” by the Sustainable Innovation SteerCo.

Each year, the Sustainable Innovation SteerCo selects a subset of standout initiatives from the broader pool of supported initiatives. Selection is based on a qualitative scoring framework assessing:

1. alignment with Odido’s sustainability themes;
2. the contribution of Odido’s network technology to the initiative;
3. the level of actual or potential impact addressed by the initiative; and
4. the initiative’s ability to generate broader awareness and visibility.

The metric reflects active support and selection status rather than outcomes delivered by the initiative. The composition of “gems” may change year-on-year as initiatives progress, conclude or are replaced by new engagements. The reported target, however, is cumulative including “gems” which have been supported in past years for at least a year.

