

Environmental Policy

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Created by: ESG Manager

Approved by: VP Business Operations

Telefónica Tech UK & I, herein referred to as 'Telefónica Tech' recognises that it has a responsibility to the environment beyond legal and regulatory requirements. We are committed to understanding and reducing our environmental impact, including prevention of pollution, and strive to continually improve our environmental performance as an integral part of our business strategy and operating methods. This policy lays out our objectives, targets and actions regarding the environment and ensuring that our internal management systems meet the requirements of ISO14001, where applicable.

Responsibility

Chris Brookes, VP of Business Operations and Janice Phayre, ESG Manager are responsible for ensuring that this Environmental Policy is implemented. However, all employees have a responsibility in their area to ensure that the aims and objectives of this policy are met.

Objectives

Our core environmental objectives are:

1. Reduce the impact we have on the environment arising from our offices, data centres and employee activities.
2. Develop, promote, and use sustainable technologies including circular IT services.
3. Enable our customers to understand the impact of our products and services on the environment.
4. Enable the Telefónica Tech employees to understand the impact their work has on their environment, nature and their communities and enable and embolden them to have a positive impact.

Targets

At a company level, to continue Telefónica S.A.'s progress toward achieving Net Zero, Telefónica Tech has produced a Carbon Reduction Plan [\[LINK\]](#) and adopted the following carbon reduction targets:

- To reduce overall company baseline scope 1 and 2 emissions by 90% or less by 2040.
- To reduce overall company baseline scope 3 emissions by 90% (value to be determined) by 2050.
- To achieve Net Zero status for scopes 1 and 2 by 2040 and scope 3 by 2050.
- To produce zero waste to landfill from all our facilities by 2040.
- To review supply chain (scope 3) emissions by 2030.
- Increase employee awareness by working with our Sustainability Steering Committee, ensuring that our policies and aims are communicated to all employees, continuing our employee lunch and learn educational programmes and providing information locally for all recycling.

Actions

2022 was the first year where we had a detailed GHG inventory. We acquired business applications, and data and AI business, which increased our headcount by more than 40%. In 2023, we increased the scope to include these additional Telefónica Tech entities and also increased the scope of emission categories included within our carbon account. As such, our

2023 carbon account is much more complete and will now be used as the base year. In 2024 we increased the scope to include overseas entities. In 2025, we set up a Climate Impact Working Group, to focus on climate risks and we continue to work on improving the data collection. We have a Carbon Reduction Plan which is signed by the VP of Business Operations and agreed by the executive board. You can see our Carbon Reduction Plan [here](#) and you will find it on the Telefónica Tech website.

Monitoring and Improvement

Telefónica Tech endeavours to review and continually improve environmental performance, by monitoring and reporting on progress against targets and objectives on a regular basis, to ensure our Environmental Management System (EMS) achieves its intended outcomes.

The Executive Board are committed to the continuous improvement of the EMS and provide the necessary resources to ensure we maintain an outstanding level of Environmental management, and our EMS continues to meet the requirements of our stakeholders and fulfil our legislative and compliance obligations.

The Executive Board are committed to promoting the use of a process approach and risk-based thinking. This approach assists us in identifying and addressing our risks and opportunities accordingly.

Ultimate responsibility of the execution of this policy resides with the VP Business Operations. The ESG Manager and the Operational Governance Team are responsible for the day-to-day management of the EMS. Team Leads are responsible for ensuring that their employees adhere to policies and procedures. We will ensure that persons under our organisations control are aware of this policy and the EMS that implements it, our objectives, and their individual role in the success of our EMS. The consequences of non-conformance are set out in the HR disciplinary policy.

We will review and, where necessary, update this policy at least once annually in consultation with employees and other stakeholders.

Signed:



Chris Brookes

Position: VP of Business Operations

Date: 11th May 2026