



**Consolidated  
Sustainability Reporting  
2025**

Prepared in accordance with the  
EU VSME standard

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## Basic Module – General Information

[21., 22., 23.]

EuroTeleSites is a leading provider of passive telecommunications infrastructure in Central and Southeastern Europe. The company builds, operates, and manages a portfolio of greenfield and rooftop towers, enabling network operators to deliver high-quality connectivity. Headquartered in Vienna, EuroTeleSites operates across Austria, Bulgaria, Croatia, North Macedonia, Serbia, and Slovenia. As a neutral host, the company promotes infrastructure sharing, digital inclusion, and the efficient use of resources. EuroTeleSites is listed on the Vienna Stock Exchange.

### B1 – Basis of Reporting

[24.]

This report 2025 has been prepared by EuroTeleSites in accordance with Option A of the VSME standard – the Basic Module. The report is designed to provide transparency to our stakeholders and aims to progressively align with these frameworks as part of its long-term commitment to sustainability and corporate responsibility.

**a) Selection of reporting option:**

EuroTeleSites has selected Option A – Basic Module.

**b) Omission of classified or sensitive information:**

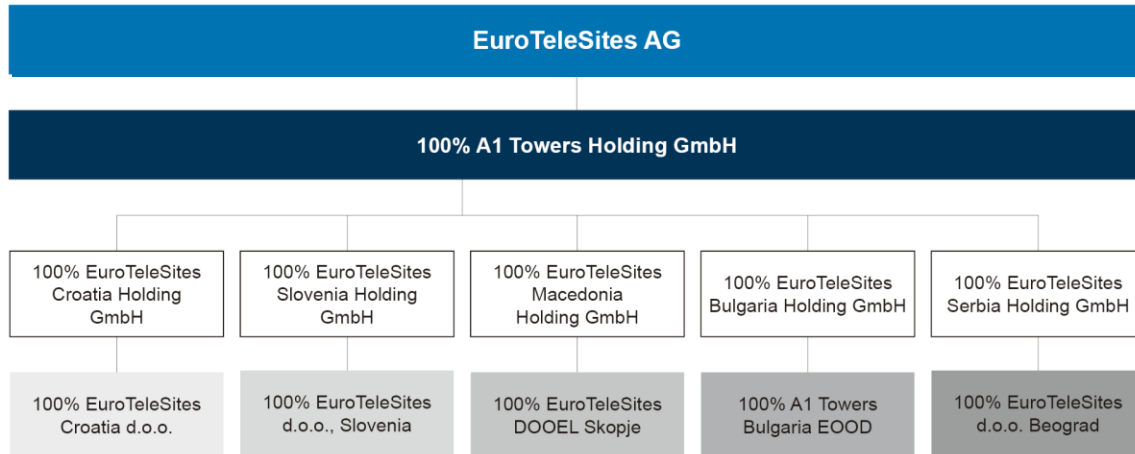
No information has been omitted due to classification or sensitivity concerns.

**c) Scope of the report:**

This report is prepared on a consolidated basis and includes sustainability-related information for EuroTeleSites and all of its subsidiaries.

**d) Subsidiaries covered:**

The following subsidiaries are included in this report:



**e) Legal entity information:**

1. **Legal form:** Public company, listed at Vienna Stock Exchange
2. **NACE sector classification code:** 61.20 – Wireless telecommunications activities
3. **Balance sheet total:** 2 099 mEUR (31 December 2025)
4. **Net turnover:** 280.2 mEUR (Full-year 2025)
5. **Number of employees:** 201 (Headcount)
6. **Country of primary operations:** Austria
7. **Significant asset locations:** Austria, Bulgaria, Croatia, North Macedonia, Serbia, Slovenia
8. **Geolocation of sites:** The Company operates 13,820 towers (as of 31 December 2025) across its six markets. A detailed geolocation table is available in the Investor Relations Databook at the homepage. (<https://eurotelesites.com/investor-relations/>)

31 December 2025	
[audited]	
<b>2.1 Number of Macro Sites</b>	
Numbers of Sites Austria	6 168
Numbers of Sites Bulgaria	2 806
Numbers of Sites Croatia	1 622
Numbers of Sites North Macedonia	605
Numbers of Sites Serbia	1 804
Numbers of Sites Slovenia	815
<b>Total Macro Sites</b>	<b>13 820</b>
Total Greenfields	6 254
Total Rooftop	7 566

With tenancy ratio of 1.25x, EuroTeleSites tower portfolio continues to offer additional co-location potential, supporting a more efficient use of infrastructure and resources in the spirit of the sharing economy.

[25.] **Certifications:** EuroTeleSites has not obtained any external sustainability-related certifications or eco-labels.

## B2 – Practices, Policies and Future Initiatives for Transitioning Towards a More Sustainable Economy

[26.] EuroTeleSites is committed to contributing to a more sustainable and digital society in Austria and Central and Eastern Europe. The following sustainability practices, policies and initiatives – concerning environmental responsibility, responsible business, conduct well-being of its workforce – are either in place or in preparation:

### a) Existing Practices

- **Circular Resource Use:** Prioritization of recycling and reuse when upgrading or decommissioning sites. In addition, steel components from dismantled towers are recycled, ensuring that materials re-enter the value chain instead of being disposed of as waste.
- **On-site Renewable Electricity:** At certain tower sites, we already produce electricity directly on site, which is used to power the mobile network equipment.
- **Workforce Well-being:** Ongoing initiatives to improve employee work-life balance and internal mobility across countries, complemented by employee-focused initiatives such as home office options, team-building events, and additional leave days to foster engagement and well-being.
- **Employee satisfaction:** Twice a year, all colleagues participate in a satisfaction survey, and the overall results have been improving continuously.

### b) Policies

EuroTeleSites has adopted internal policies that reflect its commitment to sustainability across environmental, social, and governance dimensions. These policies are embedded in daily operations and provide guidance for environmental protection, responsible energy use, and ethical conduct. While not all policies are publicly available, key elements such as the Code of Conduct and Corporate Governance Practices are disclosed and aligned with the Austrian Code of Corporate Governance.

EuroTeleSites has adopted following guiding policies on:

- AI Policy
- Code of Conduct
- Partner & Supplier Code of Conduct
- Capital Market Compliance
- Anti-bribery, anti-corruption and conflicts of interest
- Purchasing Guideline
- Supplier IT-Security Policy
- Whistleblowing Policy
- Occupational health and safety
- Information Security Policy

### c) Future Initiatives

- Fleet Transition: steadily modernizing our fleet towards more sustainable mobility solutions
- “Tower of the future” / sustainable Construction Standards: Development of sustainability standards for newly built tower sites (e.g., lower emission construction materials, biodiversity-neutral site design).

### d) Targets

- **Climate & Energy**
  - Reduce CO2 emissions through the change of the company fleet
  - Further development of the “Tower of the future”, with the clear target to build a new tower with less resources in comparison to the standard tower today
- **Workforce**
  - Ensuring zero workplace accidents through continued focus on health & safety protocols
  - Monitoring and improving employee satisfaction through regular bi-annual engagement surveys.

Sustainability Issue	Do you have existing practices / policies / initiatives?	Are they publicly available? [YES/NO]	Do the policies have any targets? [YES/NO]
Climate Change	steadily modernizing our fleet towards more sustainable mobility solutions	Yes	Yes
Circular Economy	Recycling/reuse of tower infrastructure components in case the tower is dismantled	No	No
Own Workforce	Occupational health & safety, employee sustainability training, diversity targets	No	Yes – zero accidents, satisfaction monitoring
Workers in the Value Chain	Supplier Code of Conduct, Purchasing Guideline	No	No
Business Conduct	Code of Conduct, Anti-corruption & business ethics, Capital Market Guidance	Partly (governance disclosures)	Yes – compliance targets, annual audits

[27.]

## B3 – Basic Module – Environmental Metrics

EuroTeleSites energy consumption is primarily driven by its operation of over 13,820 mobile telecommunications towers across six countries. The electricity reported refers to power used for passive infrastructure, such as lighting, ventilation, security, and climate control at tower sites, as well as electricity consumption at the company’s office locations (back office).

Active transmission equipment (e.g., antennas and radio units) is owned and powered by the tenants, such as the anchor tenant and other mobile network operators.

Some sites utilize diesel-powered generators, particularly in rural or backup locations, while grid electricity remains the dominant source in urban areas.

## B3 – Energy and Greenhouse Gas Emissions

[29.]

### Energy Consumption

Energy Type	Renewable (kWh)	Non-renewable (kWh)	Total (kWh)
Electricity (utility billings)	534,050	22,097	556,147
Heating (gas/district)	0	102,056	102,056
Fuel (for company cars)	10,598	979,979	990,577
<b>Total Energy Consumption</b>	<b>544,648</b>	<b>1,104,132</b>	<b>1,648,780</b>

EuroTeleSites contributes to sustainability by generating approximately 230,000 kWh of renewable energy annually from photovoltaic panels and wind generators. This electricity is consumed directly at the respective sites where it is generated, predominantly by tenant telecommunications operators rather than by EuroTeleSites itself.

## Overview of company cars

Company Cars	Electric	Hybrid	Petrol & Diesel	Total
<b>Total Cars</b>	5	9	45	<b>59</b>

EuroTeleSites fleet comprises 59 vehicles across six countries, with a diverse mix of petrol, diesel, hybrid, and electric models. This reflects our ongoing transition toward more sustainable mobility solutions.

## Greenhouse Gas Emissions

[30.]

Emission Scope	2025 emissions in tCO <sub>2</sub> eq
Scope 1 (company fleet)	268
Scope 2 (location-based – purchased electricity and heating)	29
<b>Total GHG Emissions</b>	<b>297</b>

## GHG Intensity

[31.]

GHG Intensity (Scope 1+2): **1,01 t CO<sub>2</sub>e** per million EUR turnover (2025).

## B4 – Pollution of Air, Water and Soil

[32.]

EuroTeleSites operates a passive telecommunications infrastructure business, which generally entails low direct emissions of pollutants to air, water, or soil.

### Legal Reporting Requirements

As of 2025, EuroTeleSites is not subject to any mandatory pollutant emissions reporting schemes under national or EU regulations. No environmental permit violations or non-compliance cases were recorded during the reporting period.

## B5 – Biodiversity

[33., 34.]

### a) Number of sites in or near biodiversity-sensitive areas

EuroTeleSites operates a passive telecommunications infrastructure with very limited environmental footprint. Based on the nature of the assets (small tower footprints, no land-intensive

operations), the company assesses its overall biodiversity impact as low. Accordingly, the number of sites in or near biodiversity-sensitive areas is currently not systematically measured or tracked.

Permits for new tower builds are subject to a site-specific review and are typically granted only where no suitable existing tower is available in the surrounding area—supporting infrastructure sharing and avoiding unnecessary land take.

In Austria, the construction and operation of mobile radio towers are governed by a comprehensive legal framework combining telecommunications law, provincial building regulations, and nature conservation requirements. Permits are issued as formal decisions and include site-specific conditions addressing landscape protection, biodiversity, and visual integration.

In sensitive areas, additional nature protection approvals apply, prescribing measures such as landscape-adapted, non-reflective colour schemes, planting or replanting of vegetation, and wildlife protection measures. Local landscape assessments further ensure that towers are integrated responsibly into their surroundings.

In the event of dismantling, the authority's permit decision ("Bescheid") includes binding, site-specific conditions governing the decommissioning and restoration measures.

#### **b) Land use types**

EuroTeleSites distinguishes between the following land use categories:

- **Greenfield sites:**

For each Greenfield tower, a sealed land surface of approximately 4m x 4m = **16 m<sup>2</sup>** is assumed, covering the concrete foundation and access base. Based on **6.254 Greenfield towers (as of 31 December 2025)**, the total use of land amounts to **~10 ha**.

- **Rooftop sites:**

Rooftop installations do not result in additional land sealing and therefore have no direct land-use impact.

- **Restored/natural areas:**

Local restoration is performed where feasible; however, these areas are not yet systematically tracked.

#### **c) Impacts on biodiversity**

EuroTeleSites operations have a relatively low biodiversity footprint, the expansion of greenfield tower sites may lead to land use changes and temporary disruption of local ecosystems. The most relevant potential impacts include:

- Disturbance of habitats during construction,
- Soil sealing and localized loss of vegetation,
- Proximity to protected areas with possible ecosystem sensitivities.

#### **d) Measures taken to protect biodiversity**

EuroTeleSites applies a precautionary approach through site planning to protect the biodiversity.



## B6 – Water

[35.]

EuroTeleSites operations are not water-intensive and do not involve significant water withdrawals, discharges, or consumption.

### **Total Water Withdrawal**

Water is used mainly for occasional activities such as:

#### **Sanitary use in office buildings**

EuroTeleSites total water withdrawal is not measured, as water use is minimal and not material to the company's operations.

#### **High Water-Stress Areas**

EuroTeleSites does not withdraw water for daily operation. Water is only needed for the construction of the radio towers at the Greenfield Sites.

### **Water Consumption**

[36.]

Since EuroTeleSites does not conduct industrial processes or cooling activities that result in significant water loss, water consumption (i.e. withdrawal minus discharge) is minimal and has not been quantified.

### **Pollution and Discharge**

The company does not discharge process water into natural bodies. Rainwater runoff from tower sites is typically minimal and directed into municipal or natural drainage systems. No regulated water discharge permits, or pollution incidents were reported in 2025.

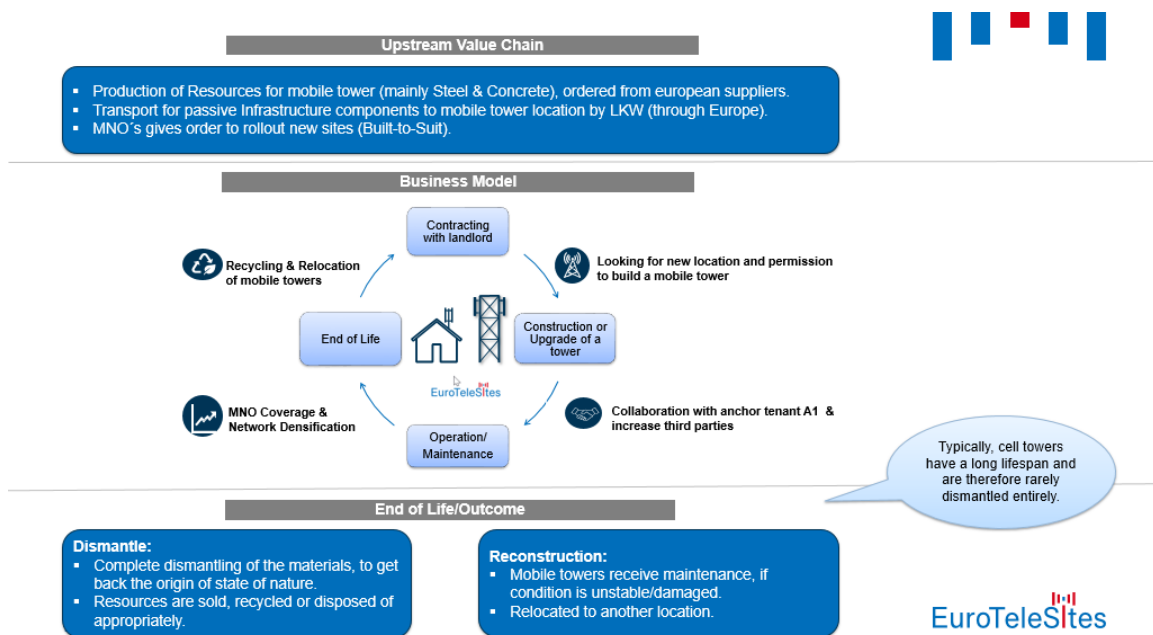
## B7 – Resource Use, Circular Economy and Waste Management

[37., 38.]

### Application of Circular Economy Principles

#### Re-use of components:

When tower sites are decommissioned, structural steel components such as tower segments are dismantled and prepared for recycling, primarily through integration into the steel recycling value chain. Reusable materials and equipment are removed and transferred to storage facilities, while obsolete components are professionally disposed of and recycled in compliance with applicable environmental standards by our local suppliers. Antennas and active equipment are returned to our customers as contractually agreed.



The upstream value chain of EuroTeleSites focuses on the procurement and production of essential materials for the construction of radio towers, particularly steel and concrete. These materials require significant amounts of energy and resources in their production. The main raw materials are:

- Steel production: Iron ore as the primary raw material, with gas, oil, and diesel used as energy sources.
- Concrete production: Sand, gravel, cement, and a mixture of secondary raw materials.

In addition to steel and concrete, other components such as air conditioning units, containers, fences, and cable supplies are part of the passive infrastructure. These components are transported to the respective radio tower sites and are then installed.

To enhance durability and extend the service life of its towers, EuroTeleSites applies hot-dip galvanization as a standard corrosion protection measure. Galvanization significantly reduces the risk of rust and structural degradation, thereby preventing the need for frequent replacement or

major maintenance interventions. This supports resource efficiency by reducing material consumption and lowering lifecycle-related environmental impacts.

As galvanization involves the controlled use of chemical processes, it is subject to strict regulatory requirements and requires highly structured, carefully managed operating procedures. The galvanization of tower structures is performed by certified suppliers on behalf of EuroTeleSites. For Austria, Bulgaria, Croatia and Slovenia EU-based suppliers are engaged. In Austria, Croatia and Slovenia, operations are carried out in compliance with ISO 1461 standards. This ensures consistent quality, long-term corrosion protection, and compliance with recognised international specifications, supporting the sustainable and responsible development of mobile infrastructure.

#### **a) Annual Waste Generation in the office building**

EuroTeleSites does not systematically track or consolidate waste volumes (hazardous or non-hazardous) generated at its office building. Waste arising from office operations is professionally managed and disposed of by the landlord. As waste management is handled externally, no detailed or consolidated waste data are currently available.

#### **b) Waste Destination**

For the same reasons as in a), EuroTeleSites is not able to provide consolidated figures on waste treatment (e.g., recycling, reuse, landfill, or incineration).

#### **c) Material Flows**

While EuroTeleSites does not publish a full mass balance or material input-output model, the most relevant materials used in new tower construction (greenfield sites) include:

- **Steel** (tower structure): typically several tons per site
- **Concrete** (foundations): used for site anchoring and base stability
- **Cabling and aluminum** (infrastructure and EMF shielding)
- **Composite plastics** (equipment shelters and housing)

In 2025, a total of 255 new sites were constructed. For 2026, an expanded construction program is expected, with approximately 400 new sites planned. Key impact drivers include material sourcing, transportation to often remote areas.

## Basic Module – Social Metrics

### B8 – Workforce – General Characteristics

[39., 40.]

EuroTeleSites operates with a lean, international workforce across six countries in Central and Eastern Europe. The company promotes a diverse, inclusive, and agile working environment that supports regional coordination and local empowerment.

#### Employment Contract Types

Contract Type	2025 Number of Employees
Permanent	200
Temporary (fixed-term or limited)	1
<b>Total</b>	<b>201</b>

#### Gender Distribution

Gender	Number of Employees	Percentage (%)
Female	86	43%
Male	115	57%
<b>Total</b>	<b>201</b>	<b>100%</b>

## Geographic Distribution

EuroTeleSites maintains local teams in all six operating countries. The following table shows the distribution by country:

Country	Number of Employees
Holding	22
Austria	58
Bulgaria	36
Croatia	30
North Macedonia	18
Serbia	28
Slovenia	9
<b>Total</b>	<b>201</b>

This figure includes 1 employee on temporary contracts. Additionally, 8 temporary interns were engaged during the year; these interns are not included in the 201 headcount, as they are classified outside the permanent and temporary employment categories for reporting purposes.

## Employee Turnover

EuroTeleSites is still in an early phase of organizational development following its establishment as an independent entity, both voluntary and involuntary turnover are being monitored to identify emerging trends.

For the reporting period, the annual employee turnover rate is 17%, calculated as the number of employees who left the company (voluntarily or involuntarily) during the 2025 calendar year, divided by the average headcount over the same period.

## Diversity, Inclusion & Mobility

EuroTeleSites fosters diversity in nationality, age, and background, particularly through cross-country assignments, flexible work structures, and support for internal transfers. These practices enhance cohesion and ensure knowledge transfer across regions.

## B9 – Workforce – Health and Safety

[41.]

EuroTeleSites considers health and safety (H&S) a fundamental aspect of its operational responsibility. While the company does not carry out high-risk construction activities directly, it oversees a broad range of contractors working on telecommunications infrastructure. Protecting both its employees and contractors is therefore a key element of the group’s risk management approach.

### Occupational Health & Safety System

- EuroTeleSites follows national occupational health and safety laws in each country of operation.
- EuroTeleSites cooperates with TELUS Health, providing employees with access to external well-being and mental health services such as 24/7 counseling, stress management resources, and digital wellbeing tools. Last year, this service was used by our employees 13 times.
- Tower climbers and field technicians are usually employed by contractors; their H&S performance is monitored through contract clauses and audits.
- The Management Board has a long-term ambition of “zero harm”, aiming for no injuries across the company. Progress is monitored using the Total Recordable Injuries Rate (TRIR) per 100 employees.

### Work-Related Accidents (Employees)

Indicator	2025 Value
Number of recordable work-related accidents	0
Rate of recordable work-related accidents (per 100 employees)	0
Number of fatalities (employees)	0

#### a) Work-Related Accidents (Own Workforce)

EuroTeleSites monitors health and safety incidents among its employees. In 2025, the following preliminary figures were recorded:

- Number of serious work-related accidents (employees): 0
- Number of employee fatalities: 0

Health & Safety remains a core priority, supported by preventive measures such as safety training, fitness checks for employees working at height, and regular compliance with national occupational safety regulations.

### **Key Safety Measures in 2025**

- Risk assessments for structural stability (*Statics*) are performed for all new tower construction sites as part of the construction and installation process.
- Mandatory safety induction trainings are provided for employees visiting operational sites.
- Regional project managers carry out on-site safety compliance checks to ensure that occupational safety rules are adhered to.

### **Well-being Initiatives**

- Flexible working arrangements (remote/hybrid).
- Ergonomic workstation assessments in headquarters.
- Employee Assistance Program “TELUS Health” for mental health support and counseling services was launched group-wide in June 2024.
- Employee satisfaction survey conducted twice a year for all employees.

EuroTeleSites aims to further embed health and safety into its core processes as it scales operations.

## **B10 – Workforce – Remuneration, Collective Bargaining and Training**

[42.]

EuroTeleSites is committed to ensuring fair compensation, social dialogue, and continuous learning across all six countries of operation. As a new company with a growing international footprint, aligning employee conditions with best practices is a key focus of the HR agenda.

### **a) Adequate Wages**

All employees of EuroTeleSites receive wages at or above the legal minimum in their respective countries. In several markets, the company offers remuneration packages above industry average, reflecting its position as a skilled infrastructure operator.

### **b) Gender Pay Gap**

The gender pay gap is calculated based on average gross hourly pay levels of male and female employees. The gender pay gap amounts to 15.4%.

### **c) Collective Bargaining Coverage**

EuroTeleSites considers all employees as covered under collective bargaining principles because legal minimum wages are stipulated in all operating countries. This ensures baseline protection equivalent to collective agreements.

Coverage by Country:

Country	Employees Covered by Collective Agreements
Austria	100%
Bulgaria	100%
Croatia	100%
North Macedonia	100%
Serbia	100%
Slovenia	100%
Group-wide average	100%

No labor disputes or strikes were reported in 2025.

#### **d) Training and Development**

EuroTeleSites is fostering a culture of professional growth and upskilling. In 2025, the following learning and development initiatives were implemented:

- Onboarding training programs for all new hires,
- Functional trainings in project management, procurement, and technical operations.

In addition, EuroTeleSites places strong emphasis on mandatory compliance and awareness training. Each employee is required to complete three core training modules annually, covering:

- Occupational health & safety,
- Compliance and Code of Conduct (incl. anti-corruption, business ethics),
- Data protection (GDPR).

The completion of mandatory training modules should reach 100% participation across the workforce in all countries.

## Basic Module – Governance Metrics

### B11 – Convictions and Fines for Corruption and Bribery

[43.]

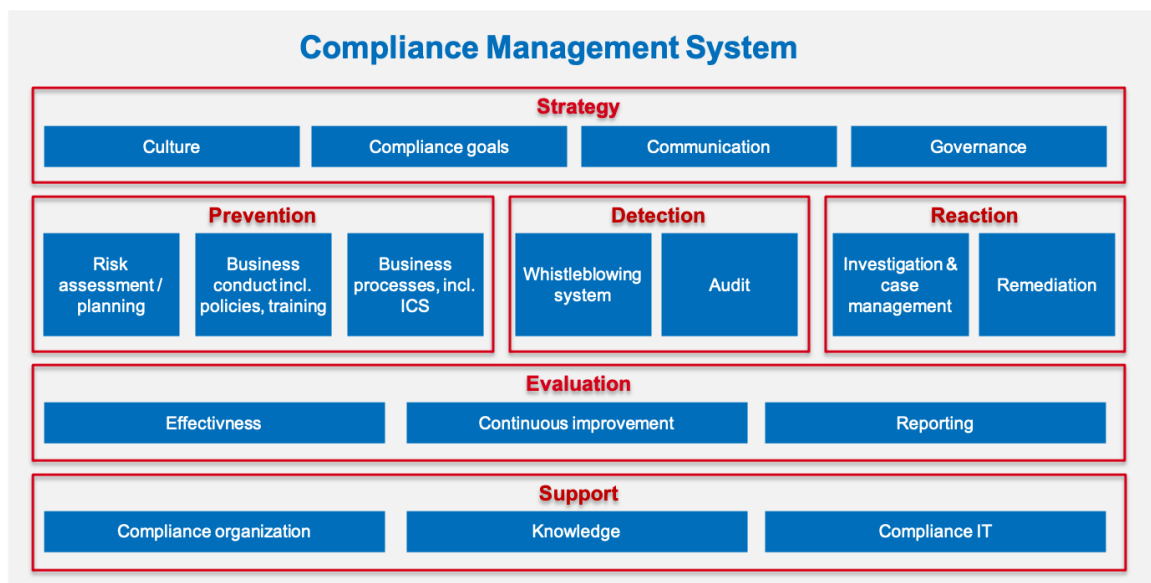
EuroTeleSites upholds a strict zero-tolerance policy toward corruption and bribery. Ethical conduct, legal compliance, and transparent governance are foundational pillars of the company’s business culture and risk management framework.

#### Anti-Corruption Policy and Controls

- EuroTeleSites applies its Code of Conduct, which includes provisions on anti-bribery, conflict of interest, and fair competition.
- Supporting guidelines include the Anti-Bribery, Anti-Corruption & Conflicts of Interest Guideline, the Capital Market Compliance Guideline, the Supplier & Partner Policy incl. Supplier Code of Conduct, and the Whistleblowing Policy.
- All employees complete annual compliance and Code of Conduct training (100% participation rate).
- A whistleblowing system (digital portal, compliance email, ombudsman) is in place and accessible to employees and external stakeholders.

#### Compliance Oversight

- The Compliance function is embedded within Group Finance & Risk, reporting to the CFO.
- Internal audits and compliance risk assessments are conducted annually.
- The Supervisory Board receives direct updates from the CFO at least once per year.



### Convictions and Fines

Indicator	2025	
	Value	Target
Number of confirmed convictions for corruption or bribery	0	0
Total amount of fines incurred (EUR)	0	0

### Preventive Actions

- Annual compliance risk assessments with targeted improvement measures.
- Additional risk-based compliance briefings for procurement staff and managers in high-risk functions.
- Ongoing revision of anti-corruption training to include market-specific case studies.

EuroTeleSites will continue enhancing its ethical governance controls in alignment with international best practices and internal compliance standards.

### Target

EuroTeleSites has set a clear target to maintain zero convictions and zero fines for corruption and bribery on a continuous basis. Preventive actions, such as mandatory compliance training for all employees (100% participation), annual compliance risk assessments, and the whistleblowing system, are designed to ensure that this target is consistently achieved.

**Imprint**

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