

SUSTAINABILITY REPORT 2024

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About the report

This 2024 Sustainability Report marks Vivacom’s 8th non-financial report and outlines our continued commitment to ethical, environmental, and socially responsible business practices.

This report is prepared on a voluntary basis and follows internationally recognized good practices and reporting standards. In this context, the report has been prepared with reference to¹ the GRI Standards, as part of our efforts to improve transparency and provide consistent, well-structured disclosures.

The information covered in this document refers to the reporting period from January 1 to December 31, 2024, and includes both qualitative and quantitative indicators across the Environmental, Social, and Governance (ESG) topics. The reporting boundary encompasses all Vivacom subsidiaries* that had activities and contributed to the organization’s environmental, social, and economic impacts during the reporting period, regardless of their acquisition or divestment status at the end of 2024.

As a member of United Group, Vivacom aligns its sustainability governance and disclosure practices with group-level frameworks and policies.

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¹ Organizations may choose to report either “with reference” or “in accordance” with the GRI Standards. Reporting “with reference” allows the preparation of a GRI Sustainability Report under specific conditions without the need to meet all requirements, offering greater flexibility while still maintaining alignment with the Standards. In contrast, reporting “in accordance” requires full compliance with all GRI requirements. This Report has not been verified by an independent third party.

* Scope of Financial and ESG Data

Note on scope of financial data :
The consolidated financial data presented in this report covers Vivacom and its subsidiaries. Certain financial indicators (e.g., revenue and income statement items) related to the activities carved out into United Fiber Bulgaria are partially reflected, based on the effective date of its spin-off from Vivacom. However, United Fiber Bulgaria assets are not included in the consolidated balance sheet as of year-end. The financial results of Bulsatcom are partially included, aligned with the timing of its merger into Vivacom.

Note on ESG data coverage:
The (ESG) data of United Fiber Bulgaria are included in this report, reflecting the company’s operational and strategic alignment with Vivacom throughout 2024. Although United Fiber Bulgaria underwent a spin-off during the year, its activities remained closely integrated with Vivacom’s operations for the majority of the reporting period. As such, the ESG performance of United Fiber Bulgaria is fully represented in this report. The social and governance data related to Bulsatcom are included in this report. However, environmental data for Bulsatcom for the reporting year 2024 are not reflected due to ongoing recalculation processes of carbon emissions across United Group, following the merger of Bulsatcom into Vivacom.

Letter from our CEO

Dear colleagues, partners, and friends,

The past year, 2024, was marked by significant achievements and bold steps for Vivacom – a year in which we proved that sustainable growth and technological progress go hand in hand. Together with United Group, we demonstrated that we can shape the future of a connected society while supporting people, protecting the environment, and delivering strong financial results.

With the acquisition of Bulsatcom, we expanded our capabilities and enriched our portfolio, providing customers with broader TV content, faster and more reliable internet, and improved customer service. This is part of our ambition to be more than a telecommunications operator – to be a true partner in people’s digital lives.

We proved that, we placed our customers at the heart of everything we do. Through enhanced digital channels, personalized services, and faster response times, we elevated the customer experience to new heights. Our Net Promoter Score reached its highest level to date, reflecting the trust and satisfaction of our users. These achievements reaffirm our commitment to delivering not only cutting-edge technology, but also meaningful, human-centered experiences that empower and connect.

Vivacom positioned itself among the global technology pioneers by becoming the first operator in Bulgaria – and one of the first in the world – to test next-generation 5.5G technology. This innovation is not just about faster speeds, it paves the way for new horizons: artificial intelligence applications, industrial automation, and digital services that once seemed distant but are now within reach.

Our investments in fiber infrastructure create the backbone of the connected society. Through United Fiber, we are part of the largest fiber network in Southeast Europe, and in Bulgaria we are working hard to reach more households. We believe that access to high-speed internet is a right for everyone, which is why we are extending our coverage to smaller towns and rural areas, providing equal opportunities for all.

At the same time, we are progressing toward a greener future. Today, Vivacom already uses renewable energy, and in the near future we will introduce additional capacity and energy storage systems. This is our contribution to reducing greenhouse gas emissions and to the sustainable development of the entire sector.

We are proud of our people – our most valuable asset. Their engagement, ideas, and talent are the foundation of our success. The recognition we received during the year – from leadership awards to honors for innovation, social responsibility, and talent development – is proof that we are moving in the right direction.

Our financial results – with 12% revenue growth – confirm that sustainable practices and innovation are not an obstacle to growth but a powerful driver of it. When a business is built on a clear vision, courage, and responsibility, success follows naturally.

We look to the future with confidence. We will continue to invest in new technologies, in artificial intelligence, and in solutions that create value for society while supporting business growth. Our ambition is clear – for Vivacom and United Group to be a driver of digital transformation in Bulgaria and across the region, a trusted partner for people, and a symbol of reliability and sustainability.

I would like to thank all employees, partners, and customers for their trust, joint efforts, and successes throughout 2024. You can learn more about all material topics for our sustainable development in the pages of this report. Enjoy the read!

Asen Velikov
Chief Executive Officer
Vivacom



VIVACOM

Vivacom at a glance

01



SUSTAINABILITY
REPORT 2024

Vivacom at a glance

Our business

Vivacom is Bulgaria’s largest fully integrated telecommunications operator, offering mobile, fixed-line, broadband, satellite, and pay-TV services to both residential and business customers. Headquartered in Sofia, it maintains a workforce of almost 5,200 employees and operates nearly 200 branded retail outlets.

The company offers an extensive portfolio of telecommunications solutions for both individual and business customers – including mobile and fixed voice services, high-speed fiber-optic internet, next-generation satellite and interactive TV, as well as comprehensive solutions for corporate clients. Vivacom also develops a wide range of innovative services in the fields of the Internet of Things (IoT) and smart cities. As a trusted partner of local governments, the company supports the digital transformation and modernization of more than 130 municipalities across Bulgaria through its smart technology solutions.

Since 2020, Vivacom has been part of United Group – the leading telecom and media operator in Southeast Europe. Being part of the Group allows the company to benefit from shared infrastructure, technology platforms, and regional expertise.



and generating annual revenues of €2.995 billion. Key infrastructure as-

United Group² is the leading telecommunications and media group in Southeast Europe, operating in eight countries with more than 14,000 employees

sets are consolidated under the United Fiber brand, including in Bulgaria, while advanced technology solutions are provided by United Cloud, the Group’s in-house R&D and innovation center, and Mainstream, a regional cloud services provider partnering with Microsoft Azure, AWS, and Google Cloud.

The Group’s media division, United Media, is a regional leader, including Nova Broadcasting Group, radio stations and print media in Bulgaria.

² More information about United Group and its sustainability practices can be found in the [2024 Sustainability Report](#).

Infrastructure and assets

The telecommunications sector requires robust and scalable infrastructure. At Vivacom, our operations rely on a broad range of fixed and mobile assets to deliver high-quality connectivity and digital services across Bulgaria. These include telecom towers, fiber-optic and copper networks, active network equipment, data centers, switching facilities, retail and technical sites, and specialized warehouses.

The core components of our telecom infrastructure include:

- **Base Telecommunications Stations installed on Cell Towers:** Enable mobile connectivity by transmitting and receiving signals to and from user devices such as smartphones, tablets, and IoT devices.
- **Transmission Lines:** A combination of underground and above-ground fiber-optic and copper cables, along with wireless backhaul solutions, that transport data and voice traffic between network nodes and facilities.
- **Switching, Data Centers and Technical sites:** Route and manage network traffic, interconnect users with the global internet, host various digital services and house critical infrastructure ensuring network reliability.
- **Digital Services:** The systems and platforms that deliver voice, data, TV, cloud, and IoT services to end users.
- **Retail Sites:** A nationwide networkd of customer service centers that provide convenient access to products, services and support.

Mission

Our mission is to provide our customers with high-quality telecommunications services and the best possible customer experience.

Vision

Our vision is to be the preferred telecommunications provider in Bulgaria. We deliver strong results today and make the right decisions for the future.

Values

Efficient

Inspired

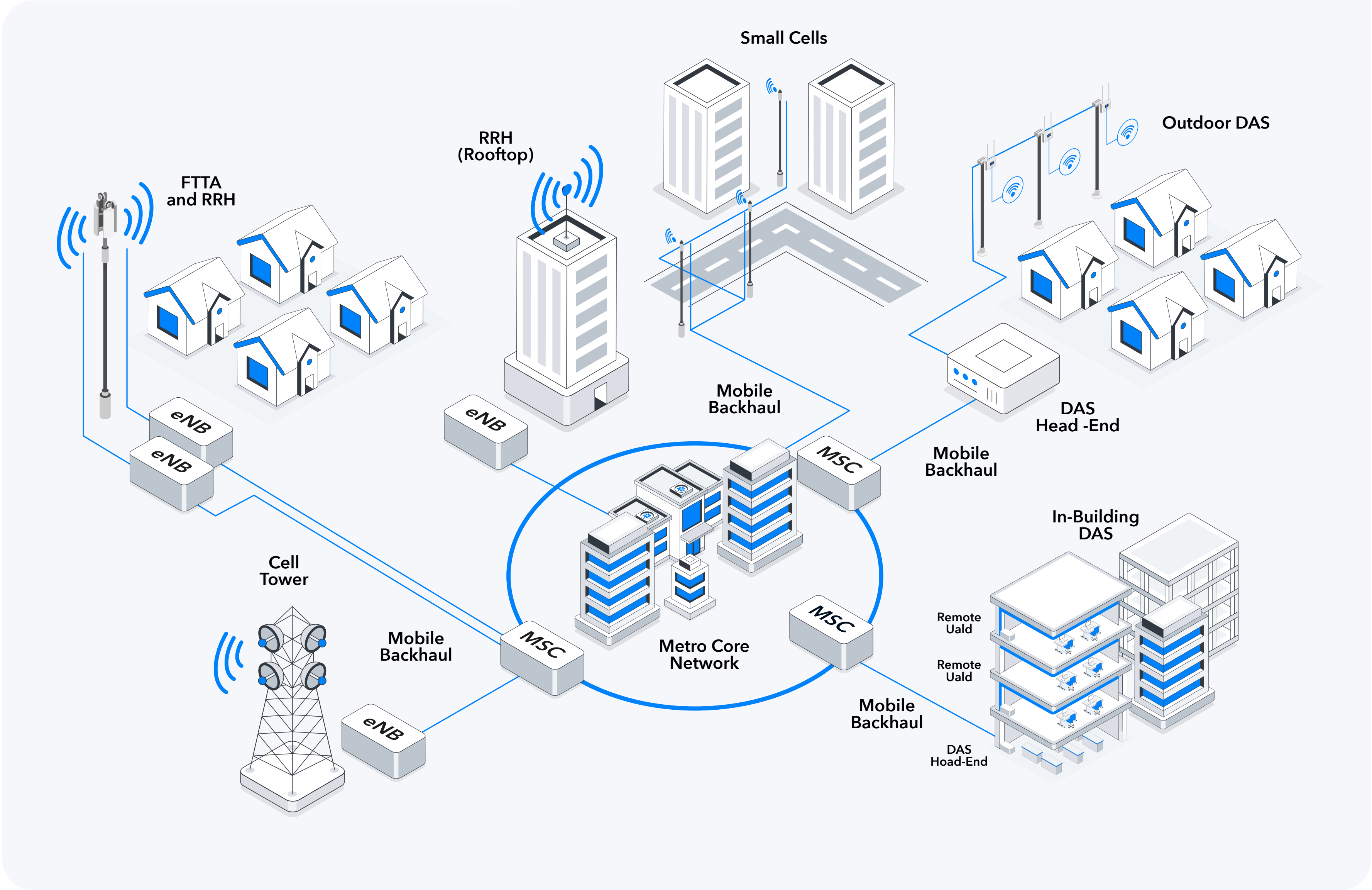
Innovative

Honest

Dynamic

Responsible

Telecommunications system:



Some infrastructure assets in our telecommunication system, such as fixed duct and fiber networks, are managed by specialized entities. This setup enables more efficient asset management, optimized utilization, and better alignment with United Group’s long-term infrastructure strategy across the region.

- Fixed-line (fiber) network and associated operations:** These have been carved-out to a separate legal entity – United Fiber Bulgaria responsible for managing and developing the fixed infrastructure in the country.

Services and capabilities



Mobile network

enabling mobile voice, data, and internet services via cellular technologies

5G Network:

- ✓ 91.1% coverage of the Bulgarian population

4G (LTE Advanced):

- ✓ 97.6% population coverage

Vivacom was the first operator in Bulgaria to launch a **commercial 5G network across all 27 regional cities** back in 2020. In 2024 it operates the 5G network with the widest coverage in the country according to the publicly available information.

Coverage percentages are based on standardized signal strength thresholds used in internal network performance assessments.



Fixed network

delivering high-speed internet, television and other telecommunications services

Used Fiber optic network:

- ✓ Over 38,000 km
- ✓ 2,100,000 passed homes³

Provides **high-speed connectivity**, incl. FTTB (Active ethernet), GPON (Gigabit Passive Optical Network), XGSPON (10 Gigabit Symmetrical Passive Optical Network), FTTC (Fiber-to-the-cabinet).

Own copper cable network:

- ✓ 22,300 km
- ✓ Over 222,750 users

Provides **fixed telephony and fixed broadband**, incl. ADSL (Asymmetric Digital Subscriber Line), VDSL (Veryhigh-bit-rate Digital Subscriber Line), POTS (Plain Old Telephone Service).

TV services:

- ✓ EON interactive TV platform – over 30,000 VOD titles, with total coverage of 1,561,548 households
- ✓ DTH satellite TV – almost 200,000 antennas upgraded and total 515,754 subscribers

Provides **interactive and satellite television services**, incl. national SD/HD channels, extensive video-on-demand libraries, and advanced interactive features such as Watch Offline, Skip Intro, and personalized recommendations, ensuring reliable nationwide coverage.

Vivacom has deployed Bulgaria’s first 10 GIGA network - an advanced fiber-optic infrastructure offering internet speeds up to ten times higher than previously available on the market.

³ The 2024 figure includes both FTTx + LANOPs HP and FTTC households.



Growth and achievements



In February 2024, Vivacom completed the acquisition of Bulsatcom, a direct-to-home satellite television and broadband internet provider in Bulgaria. The acquisition is part of United Group’s long-term strategy to expand and strengthen its market presence in the region and to foster innovation towards a digital and connected society. This marks a significant improvement in service quality for Bulsatcom customers, including enhanced TV service with more HD channels, as well as faster and more reliable internet with improved download and upload speeds. In 2024, the physical integration of customer service locations was carried out smoothly to ensure better, faster, and more seamless customer support.



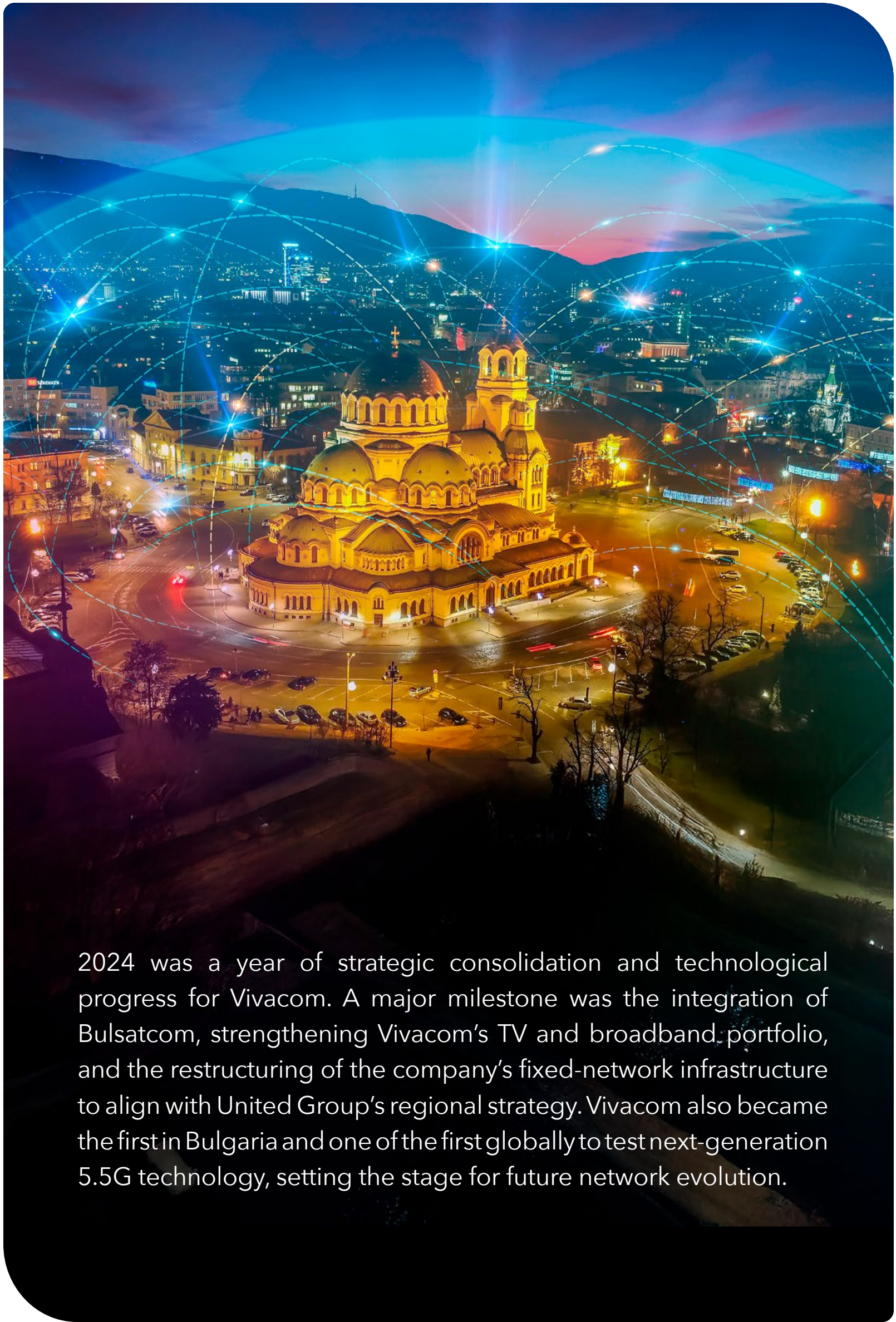
Vivacom’s fiber infrastructure was spun off into a new entity called United Fiber Bulgaria, in line with United Group’s strategy to consolidate its fixed network assets under the United Fiber brand. This strategic move reflects the Group’s focus on the expansion and development of fiber-optic networks and infrastructure across the region. Through United Fiber, United Group has consolidated over 60,000 km of optical network across Southeast Europe (incl. Bulgaria, Greece, Croatia and Slovenia), reaching approximately 3.6 million homes. In Bulgaria alone, the network currently covers around 50% of households, with a target to increase coverage to 67% by 2028.

5.5G

In May 2024, Vivacom became the first operator in Bulgaria (and one of the first globally) to test the latest generation of 5.5G technology. This innovation marks the next major step in the evolution of 5G and is based on the latest mobile network standard, 5G Advanced (Release 18). The 5.5G lab test results were impressive, achieving average download speeds exceeding 10 Gbps and upload speeds over 1 Gbps. These results confirm a tenfold increase in network capacity compared to the initial 5G standard, enabling up to 10 times faster data transmission and supporting a significantly higher number of connected devices. For both businesses and end users, 5.5G is expected to deliver substantially higher performance, greater efficiency, and even lower latency, unlocking new possibilities for digital services and next-generation connectivity.



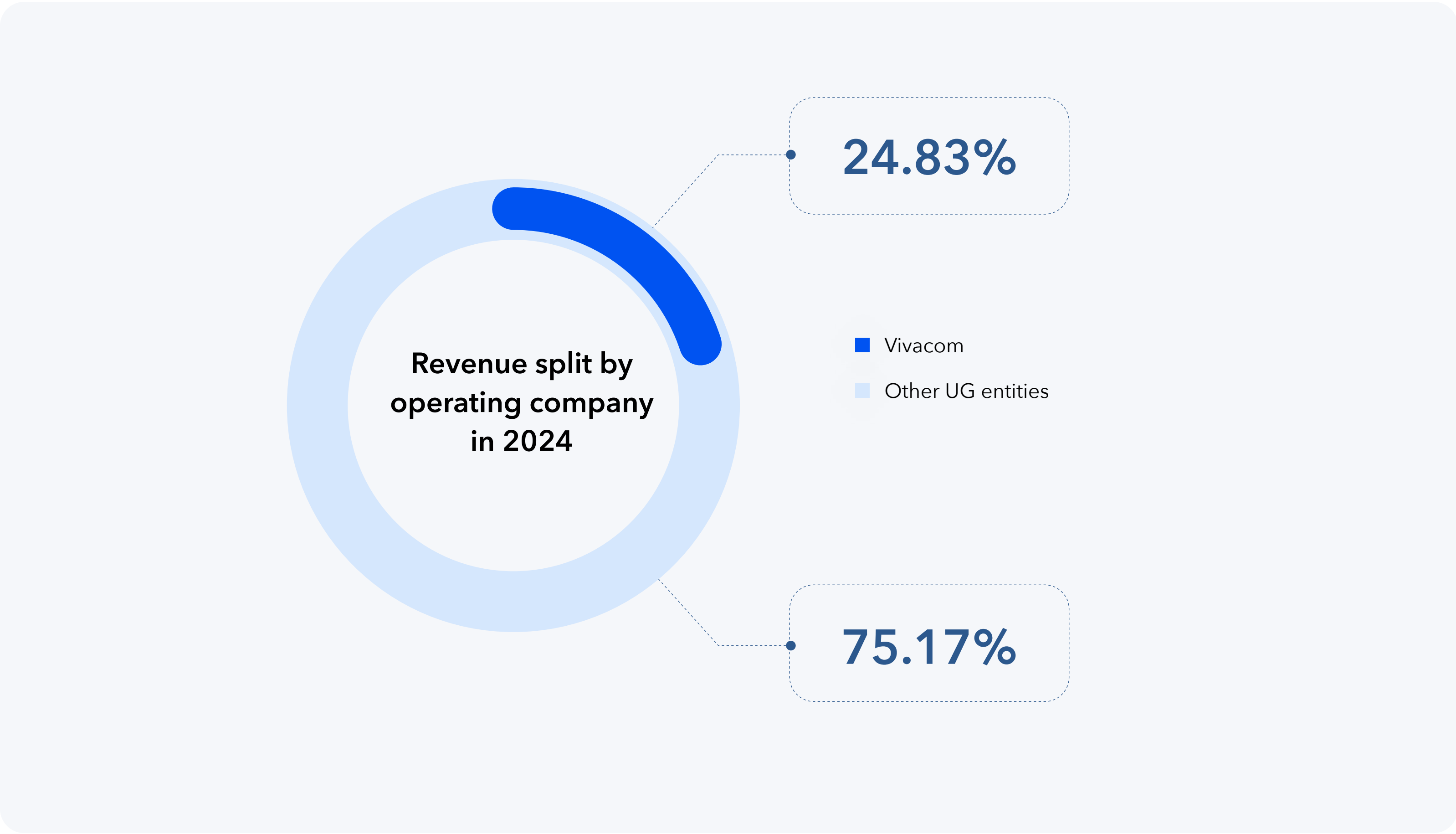
In 2024, Vivacom began migrating its satellite TV service to a new satellite (Hot Bird 13°E) which required the reorientation of customer satellite dishes. This transition aims to improve the quality and reliability of the TV service, enabling more HD channels, better signal stability, and an overall enhanced viewing experience. The process was carried out smoothly, with technical support provided to customers as needed.



2024 was a year of strategic consolidation and technological progress for Vivacom. A major milestone was the integration of Bulsatcom, strengthening Vivacom’s TV and broadband portfolio, and the restructuring of the company’s fixed-network infrastructure to align with United Group’s regional strategy. Vivacom also became the first in Bulgaria and one of the first globally to test next-generation 5.5G technology, setting the stage for future network evolution.

Growth and achievements

In 2024, Vivacom significantly improved its financial performance, reporting annual revenue growth of 12%.



Financial highlights for 2024⁴ (in thousand BGN)

REVENUE:	NET INCOME:
1,429,909	237,329
TOTAL ASSETS:	EBITDA:
2,845,750	744,025
CAPITAL INVESTMENTS:	COMMUNITY INVESTMENTS:
284,837	2,903
EU FUNDING RECEIVED FOR ONGOING PROJECTS:	RECEIVED STATE SUBSIDIES ⁵ :
5,258	5,138

⁴ Note on scope of financial data: The consolidated financial data presented in this report covers Vivacom and its subsidiaries. Certain financial indicators (e.g., revenue and income statement items) related to the activities carved out into United Fiber are partially reflected, based on the effective date of its spin-off from Vivacom. However, its assets are not included in the consolidated balance sheet as of year-end. The financial results of Bulsatcom are partially included, aligned with the timing of its merger into Vivacom.

⁵ The costs of electricity for all non-household consumers are compensated through decisions issued by the Council of Ministers – several such decisions were adopted in 2024.

Memberships and Awards

Memberships



Confederation of Employers and Industrialists of Bulgaria – KRIB



American Chamber of Commerce in Bulgaria - AmCham



Bulgarian Association of Information Technologies



British Bulgarian Chamber of Commerce



ICT Cluster - Varna



Bulgarian Donation Forum



Bulgarian Donation Forum



Bulgarian Business Leaders Forum



BULGARIAN ASSOCIATION
FOR PEOPLE MANAGEMENT

Bulgarian Association for People Management



Center for the study



Association or Global System for Mobile



Alliance of Technology Industry



Connect Europe*
/*United Group is the official member of the organization./



Bulgarian industrial capital association

Memberships and Awards

Awards



Bulgarian Business Leaders Forum

Vivacom ranked **first** in "Investor in Human Capital and Working Conditions" with its Summer Internship Program.



Career Show Awards

Vivacom **won two awards** at the prestigious Best Employer in Bulgaria awards. We **won silver** in the category "Training and Development Strategy" with the "Key Management Skills" program and **bronze** in the "Talent Attraction Strategy".



Leaders of Influence Awards 2024

Vivacom won the grand prize for the leadership, innovation and positive impact the company has on society through sustainable solutions, high-quality services and socially responsible initiatives.

In addition to the grand prize of Leader of the Year, Vivacom also won three awards for innovation in the categories – Innovation and Success, Strategy, Leadership and Success and Leading by Innovation. In the Innovation and Success category, Vivacom won first place, and for establishing itself as a leader and leading investor in the Bulgarian telecommunications market, Vivacom won second place in the Strategy, Leadership and Success category.

Memberships and Awards

Awards



"Golden Heart" Charity Awards



Vivacom **won three** Golden Heart awards. The company **won first place** in the **CSR Innovation and Sustainable Development** category with the **Vivacom Regional Grant**. The prize in the **Investor in Society** category was **awarded** for the **long-standing youth programs** with which Vivacom invests in the development of the future generation.

In the **Employee Social Responsibility** category, the long-standing sustainable payroll donation program **Viva Help** was honored.



Forbes HR & Employer Branding Awards



Vivacom received recognition at the prestigious Forbes HR & Employer Branding Awards.

We are winners in the Employee Engagement category and finalists in the Talent Acquisition category.



Teleport Awards for Excellence (World Teleport Assosiation)



Vivacom achieved a remarkable milestone by ranking in the Top 10 of the prestigious World Teleport Association (WTA) for the fourth consecutive year. The recognition is based on revenue growth in business services, and Vivacom remains the only Bulgarian company to earn this distinction.

This success reflects the company's strategic investments in high-quality products, advanced technologies, and regional infrastructure expansion, supported by United Group.

Highlights 2024



Environment

- ✓ **38% reduction** in Scope 1 & 2 emissions vs. 2020
- ✓ **34% reduction** in Scope 3 emissions vs. 2022
- ✓ **343 MWh of self-generated solar energy** + 82 GWh purchased via GOs
- ✓ **429 tons** of copper cables recycled by the **Copper Cables Scrap project**
- ✓ Maintained **100%** diversion of operational **waste** from landfill



Social

- ✓ Highest-ever **Customer Satisfaction Score - 86%**
- ✓ Invested around **€ 10 million** for **over 90,000+ households** who gained FTTH access in **23 new settlements**
- ✓ Vivacom was ranked in the **Top 10** of the prestigious **WTA** for the **4th consecutive year**
- ✓ **Won the Employee Engagement award** at the Forbes HR Awards
- ✓ Doubled funding and **record of 395** applications for the **Vivacom Regional Grant**
- ✓ **61%** of the targeted **DTH TV antennas** had been redirected on a large-scale project to improve DTH service quality, coverage and content access



Governance

- ✓ Certification process for **ISO 37001:2016** launched
- ✓ **1,265 third-party entities** screened for sanctions and adverse risks
- ✓ **201 managers** completed Key Management Skills program
- ✓ **5,648 employees** trained on data privacy topics (**5,701 training hours**)
- ✓ A **DE&I survey** in 2024 engaged **nearly 4,000 employees** to assess current practices and gather suggestions for improvement
- ✓ Nearly **40%** of our **managerial positions** are held by **women**.



Business & Market

- ✓ **+12%** revenue growth driven by strong organic performance and successful acquisitions
- ✓ **Successful integration of Bulsatcom and Networx**, incl. expanded content portfolio and customer base
- ✓ **First 5.5G test in Bulgaria**, among the first globally
- ✓ **91.1% 5G population coverage** with 156 new base stations
- ✓ **€15.7 million invested** in network expansion and upgrades

Our ESG framework

Strategic priorities

Vivacom aligns with United Group’s ESG priorities, drawing on its targets for net-zero emissions, renewable energy, circularity, diversity, equity and inclusion, and governance. These commitments are thoughtfully adapted to the Bulgarian context, with sustainability initiatives tailored to the local market, regulatory landscape, and customer needs. By embedding ESG goals into its business model, Vivacom transforms global ambitions into tangible, measurable outcomes. This localized approach ensures that sustainability efforts are both relevant and impactful at the national level. Environmental targets include data from Vivacom and United Fiber Bulgaria, but do not include Bulsatcom data for 2024.

⁶ The outlined targets reflect the group-level targets to which Vivacom is committed, with its contribution demonstrated through the activities carried out and the strategic decisions taken.

⁷ Operational waste does not include municipal waste.

⁸ The (ESG) data of United Fiber Bulgaria are included in this report, reflecting the company’s operational and strategic alignment with Vivacom throughout 2024. Although United Fiber Bulgaria underwent a spin-off during the year, its activities remained closely integrated with Vivacom’s operations for the majority of the reporting period. As such, the ESG performance of United Fiber Bulgaria is fully represented in this report. The social and governance data related to Bulsatcom are included in this report. However, environmental data for Bulsatcom for the reporting year 2024 are not reflected due to ongoing recalculation processes of carbon emissions across United Group, following the merger of Bulsatcom into Vivacom.

ESG sustainability targets ⁶		Vivacom’s performance
E	Reaching net-zero greenhouse gas emissions across the value chain by 2040	Ongoing
E	Reducing absolute scope 1 and 2 GHG emissions 90% by 2030 from a 2020 base year	38%
E	Reducing scope 3 GHG emissions covering purchased goods and services, capital goods, fuel- and energy-related activities and business travel 40% by 2030 from a 2022 base year	34%
E	Transitioning to 100% renewable electricity in operations by 2027	49%
E	Divert 100% of operational waste from the landfill by optimizing resource use and promoting recycling initiatives ⁷	Maintained 100%
S	Promoting gender equality, aiming for 40% women in management roles by 2030	Achieved - 42% ⁸
S	Ensure that all managers undergo training in recognizing unconscious bias and adopting inclusive recruitment practices by 2026	Employees trained in “Key Management Skills” in 2024 – total of 201 participants ⁸
S	Roll out an annual voluntary Diversity and Inclusion Survey to better tailor the DEI strategy and corrective action plan	Conducted a DEI survey in 2024, covering nearly 4,000 employees
S	Providing an average of 25 hours of learning and development per employee per year	39.55 ⁸
G	Ensuring strong ethics and compliance through 100% annual Code of Conduct training	Achieved
G	Maintaining a Compliance Management System aligned with international best practices and securing external certification ensuring proactive adherence to evolving regulatory standards	Achieved

Strategic priorities

Our progress supports the SDGs in three core areas

E

Empowering a Sustainable Future through Environmental Stewardship



Supported by: Renewable energy, reducing carbon footprint, climate action, waste reduction, circular economy, promoting sustainable practices across our operations

S

Promoting Social Well-being through Connectivity



Supported by: digital inclusion, sustainable and resilient infrastructure, access to technology and connectivity, gender equality, innovation, reduced inequalities, quality education

G

Ethical governance & growth



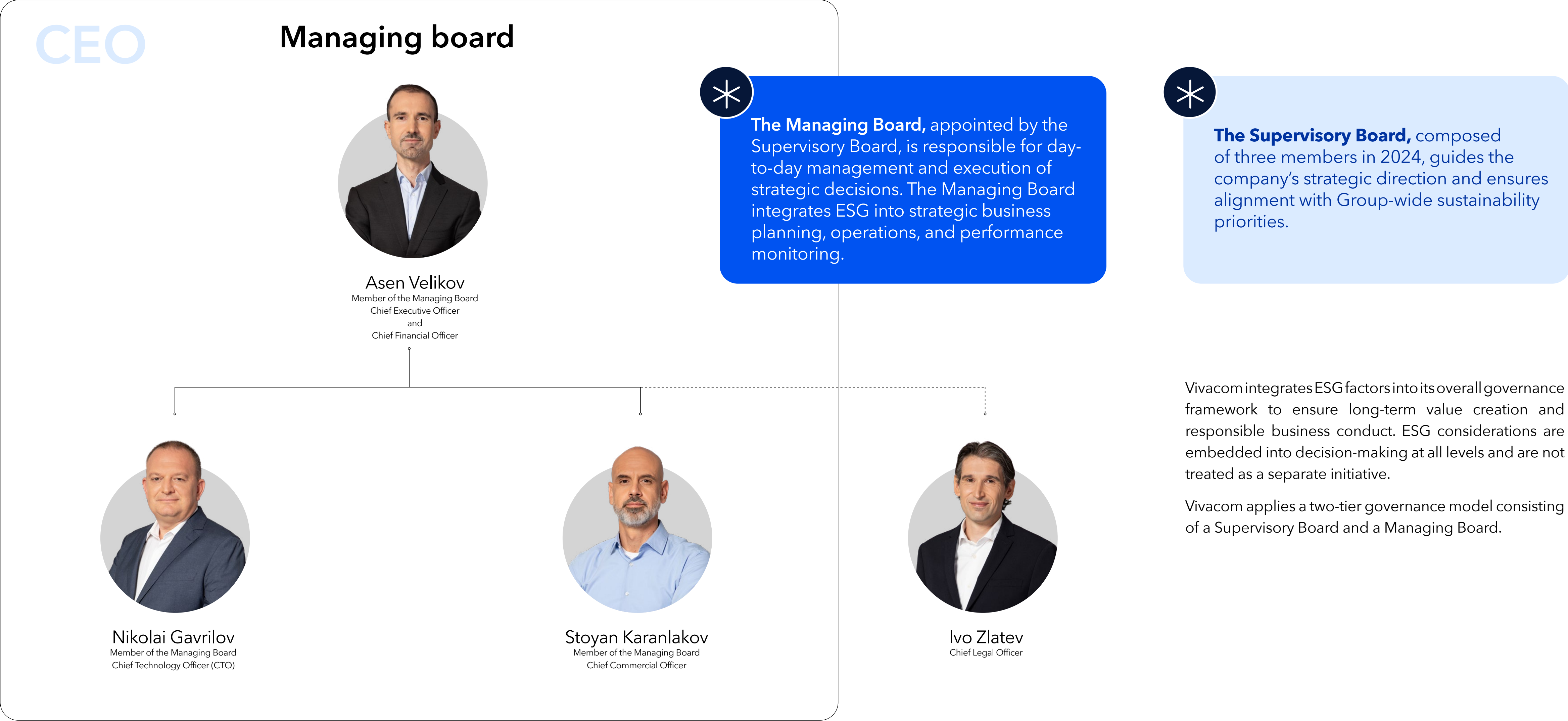
Supported by: fair labor practices, promoting employees well-being and diversity, transparency, compliance, partnerships for impact



As a member of the UN Global Compact⁹, Vivacom places strong emphasis on aligning its business practices with the United Nations Sustainable Development Goals (SDGs), recognizing their role in addressing global challenges and fostering positive change. By embedding these goals into our strategy, Vivacom ensures that local actions in Bulgaria contribute to the collective effort for a more sustainable and inclusive world.

⁹ The outlined targets reflect the group-level targets to which Vivacom is committed, with its contribution demonstrated through the activities carried out and the strategic decisions taken.

Governance approach



Governance approach

Building on this structure, Vivacom has established a dedicated ESG governance framework that ensures both strategic oversight and operational execution of sustainability initiatives. This framework is anchored by a cross-functional ESG Committee and a Local ESG Management Team, which work together to embed sustainability across all business units.



The Local ESG Management Team supports implementation across the business, with each subsidiary having a designated ESG Manager to promote accountability and operational integration.

The launch of the “Keep the Future” internal program in 2023 laid the foundation for a cross-functional sustainability culture, engaging all managerial levels and preparing the organization to fully embed ESG principles. Regular ESG sessions are integrated into Vivacom’s operational management processes, with ESG committee members together with top leadership present and analyse annual progress updates to ensuring continuous oversight and impact monitoring.



✱ The ESG Committee brings together leaders from across functions to track ESG progress, analyze outcomes, and report directly to the CEO and the Boards.



ESG Committee activities in 2024:

- ✓ Reviewed Vivacom’s environmental performance for 2023 and reaffirmed the company’s commitment to carbon footprint reduction, while identifying material topics through internal discussions and evaluations.
- ✓ Approved an increased volume of Guarantees of Origin (GOs) to address Scope 2 emissions from electricity consumption.
- ✓ Initiated the development of Vivacom’s Waste Management Plan to support the Group’s goal of zero waste to landfill by 2030 and advance circular economy objectives.
- ✓ Acknowledged the importance of obtaining ISO 50001:2018(Energy Management Systems), providing a structured framework for improving energy performance and reducing environmental impact.
- ✓ Emphasized the importance of maintaining ISO 37001 (Anti-Bribery Management Systems), helping safeguard the organization against bribery risks and promoting a culture of integrity across all levels of operation.

ESG topics

As part of its ongoing reporting process, Vivacom undertook a structured review of relevant ESG topics in line with its strategic priorities and evolving business context. The aim of this reassessment was to ensure an accurate and objective evaluation of material topics, reflecting their significance in the context of the company’s operations.

The assessment and review process included the following steps:

- A comprehensive reassessment of all topics evaluated in 2023, alongside the identification of additional ESG topics with actual and potential, negative and positive impacts on the economy, environment, and people, in line with good materiality assessment practices. The process included an in-depth analysis of ESG topics, taking into account:
 - o Market and regulatory developments
 - o Stakeholder expectations
 - o Legal and compliance requirements
 - o ESG impacts relevant to the telecommunications sector in general
 - o The local context in Bulgaria.
- Identification of material topics through internal discussion and evaluation, involving the company’s governance structures and ESG Committee. The final list of material topics was validated by the top management and Group-level representatives to ensure alignment with United Group’s overarching ESG priorities.

Compared to the previous year, the scope of assessed topics was expanded to better reflect both actual and potential impacts related to Vivacom’s business. Topics identified as material are actively managed by the company through clearly defined objectives, performance indicators, and monitoring mechanisms.



ESG topics and their scope covered by the materiality assessment

ESG	Topic	Scope	Assessed as material
E	Climate and energy	• Management of greenhouse gas emissions from operations • Energy efficiency measures • Electricity from renewable sources • Emissions management in the supply chain	✓
E	Circular economy and waste	• Waste management from operations (own operations) and proper treatment • Management of waste from electrical and electronic equipment. • Waste reduction, preparation for reuse and recycling.	✓
E	Pollution	• Water, air, soil pollution	✗
E	Biodiversity	• Conservation of biological species and habitats at the place of operation of the business • Changes in land use	✗
E	Water	• Water consumption (offices, store network) • Provision of good quality water for hygiene and domestic needs (offices, store network)	✗
S	Network coverage and reliability	• Connectivity, ensuring network coverage • Quality and reliability of services	✓
S	Quality services	• Variety of services and introduction of new services to the market • Customer satisfaction and customer service	✓
S	Cyber security	• Protecting computer systems and networks from cyberattacks and unauthorized access. • Assessment and management of information security risks. • Development of strategies for incident response and data recovery. • Training employees to recognize threats and prevent incidents.	✓
S	Data privacy	• Protecting customers' personal information. • Compliance with data protection regulations and standards (e.g. GDPR). • Transparency in data processing practices and information for users.	✓
S	Digital inclusion	• Digital connectivity • Accessibility of mobile and fixed services, incl. equal access to technologies and affordable prices • Providing affordable and reliable internet	✓

ESG topics and their scope covered by the materiality assessment			
ESG	Topic	Scope	Assessed as material
S	Smart solutions and innovations	- Support for municipalities and other partners to implement smart solutions in urban areas - AI solutions	✓
S	Human capital	- Recruiting new employees and new talents - Employee well-being and social benefits - Employee professional and personal development, trainings - Engagement and motivation - Employee appraisal process - Internship programs	✓
S	Community investment	- CSR - Donation programs, sponsorships - Investments in educational programs and environmental protection	✗
S	Health and safety	- Ensuring health and safety for employees, incl. conducting training and briefings - Health and safety risk assessment programs - Health and safety management system	✗
S	Diversity, equality and inclusion	- Promoting diversity, equality and inclusion - Equal treatment - Fair pay - Commitment to collective bargaining	✗
G	Business ethics	- Ethical business conduct in relations with partners, customers and other stakeholders - Ensuring compliance with legislative requirements - Mechanisms for submitting and addressing signals - Combating corruption and bribery, fraud, theft, conflict of interest - Compliance with ethical standards by suppliers - Environmental and social requirements in the supply chain	✓
G	Risk management	- Business risk management - Climate change risk management - Compliance with international standards and implementation of good practices	✓

To ensure transparency, this report includes not only topics classified as material, but also others that are actively managed due to their relevance for key stakeholders or alignment with the company’s sustainability commitments.

VIVACOM

Environmental performance

02

SUSTAINABILITY
REPORT 2024

Climate and energy



Highlights from 2024

- ✓ Reduced Scope 1 and Scope 2 (market-based) emissions by 38% compared to 2020, as a result of energy efficiency and renewable energy initiatives.
- ✓ Reduced Scope 3 emissions by 34% compared to the 2022 baseline through supply chain engagement and optimization measures.
- ✓ Achieved 16% annual improvement in the Network Efficiency Index of (from 31 to 26 MWh/PB) through measures to enhance the energy efficiency of fixed and mobile networks.
- ✓ Generated 343 MWh of renewable energy from company-owned solar panels.
- ✓ Improved energy management in data centers by installing and commissioning a new building management system (BMS).
- ✓ Secured 82 GWh of green electricity through Guarantees of Origin.
- ✓ Expanded sustainable mobility by adding 40 new electric vehicles and building 10 company-owned charging stations.
- ✓ More than 10% energy consumption savings achieved through network modernization and optimization.

“At Vivacom, we are fully committed to reducing our environmental impact across all aspects of our operations. From modernizing our infrastructure and implementing energy-efficient solutions in data centers to investing in renewable energy projects, every step we take is aimed at lowering our carbon footprint and supporting a sustainable future.”

Evgeniya Pavlova | Sustainability Manager



Greenhouse gas emissions

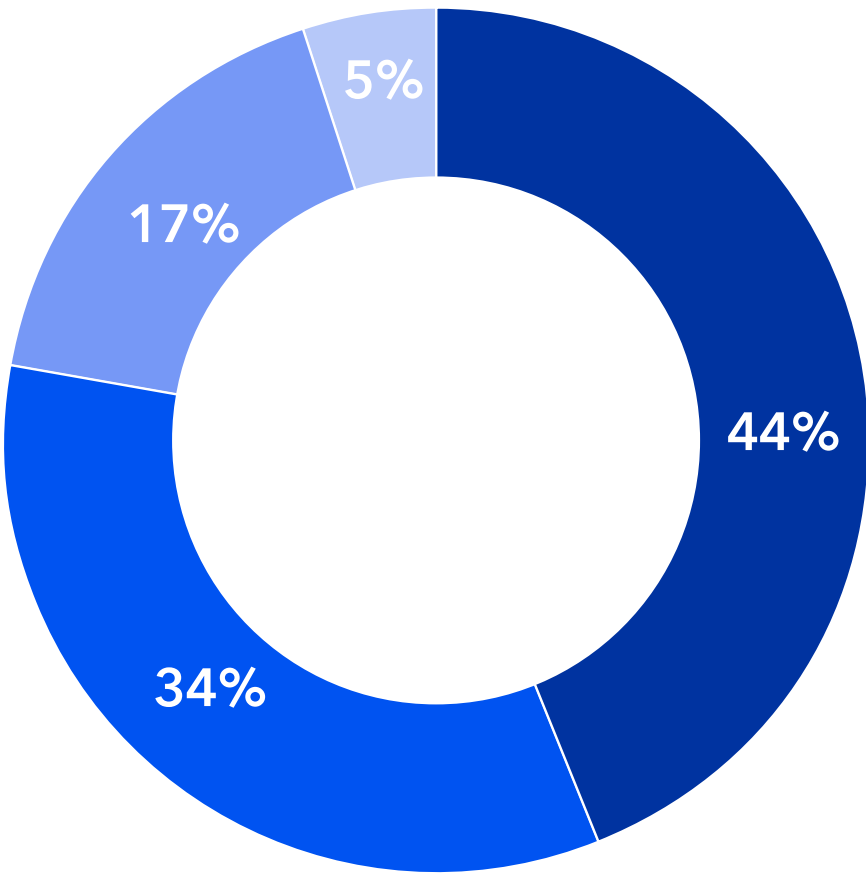


In line with United Group’s overarching goal of achieving netzero emissions across the value chain by 2040, Vivacom is implementing a comprehensive plan to improve energy efficiency and achieve decarbonization. Our initiatives include modernization and optimization of network infrastructure, the integration of electric vehicles and charging stations, the deployment of advanced building and data center energy management systems, and the increased use of renewable energy - through on-site photovoltaic installations, United Group large-scale energy project that includes 3 solar and 1 wind power plants in Bulgaria and the

purchase of Guarantees of Origin (GOs). Together, these measures enable more efficient use of resources and support the Group’s long-term climate targets. The impact of our initiatives is reflected in Vivacom’s measurable progress in reducing greenhouse gas emissions. By implementing targeted measures, the company achieved a 38% reduction in Scope 1 and 2 emissions¹⁰ compared to the 2020 baseline. Beyond our direct operations, a significant share of emissions arises across the value chain. The chart below illustrates the relative contribution of each segment, highlighting where the main impacts occur.

¹⁰ Taking into account Scope 2 market-based GHG emissions.

	SCOPE 1 & 2 (tCO2e)				
	2020	2021	2022	2023	2024
SCOPE 1	4,839	5,174	5,710	5,656	5,749
SCOPE 2 Market-based	57,667	63,671	81,389	57,777	32,939
SCOPE 2 Location-based	68,512	59,350	59,112	64,411	76,705
Total SCOPE 1 & 2 market - based	62,506	68,845	87,099	63,433	38,688



- 1 Our operations
- 2 Supply chain
- 3 Other upstream emissions
- 4 Downstream emissions

1

Our operations
Fuel and electricity use in our operations - electricity, natural gas, diesel, gasoline and liquefied petroleum gas (LPG).

2

Supply chain
Emission from purchased goods and services and capital goods: Expansion, maintenance, modernization of network and network equipment, software, licensing, hardware, mobile phones and other equipment.

3

Other upstream emissions
Emissions from upstream fuel and electricity, transportation, employee travel, waste, leased assets, software, licensing, hardware, mobile phones and other equipment.

4

Downstream emissions
Emissions from customer use, disposal of customers goods, and downstream leased assets.

Addressing value chain impacts is central to our climate strategy, which is why we place particular focus on Scope 3 emissions. These indirect greenhouse gas emissions stem from our upstream and downstream activities and, while outside our direct control, we understand their significant contribution to our overall environmental impact.

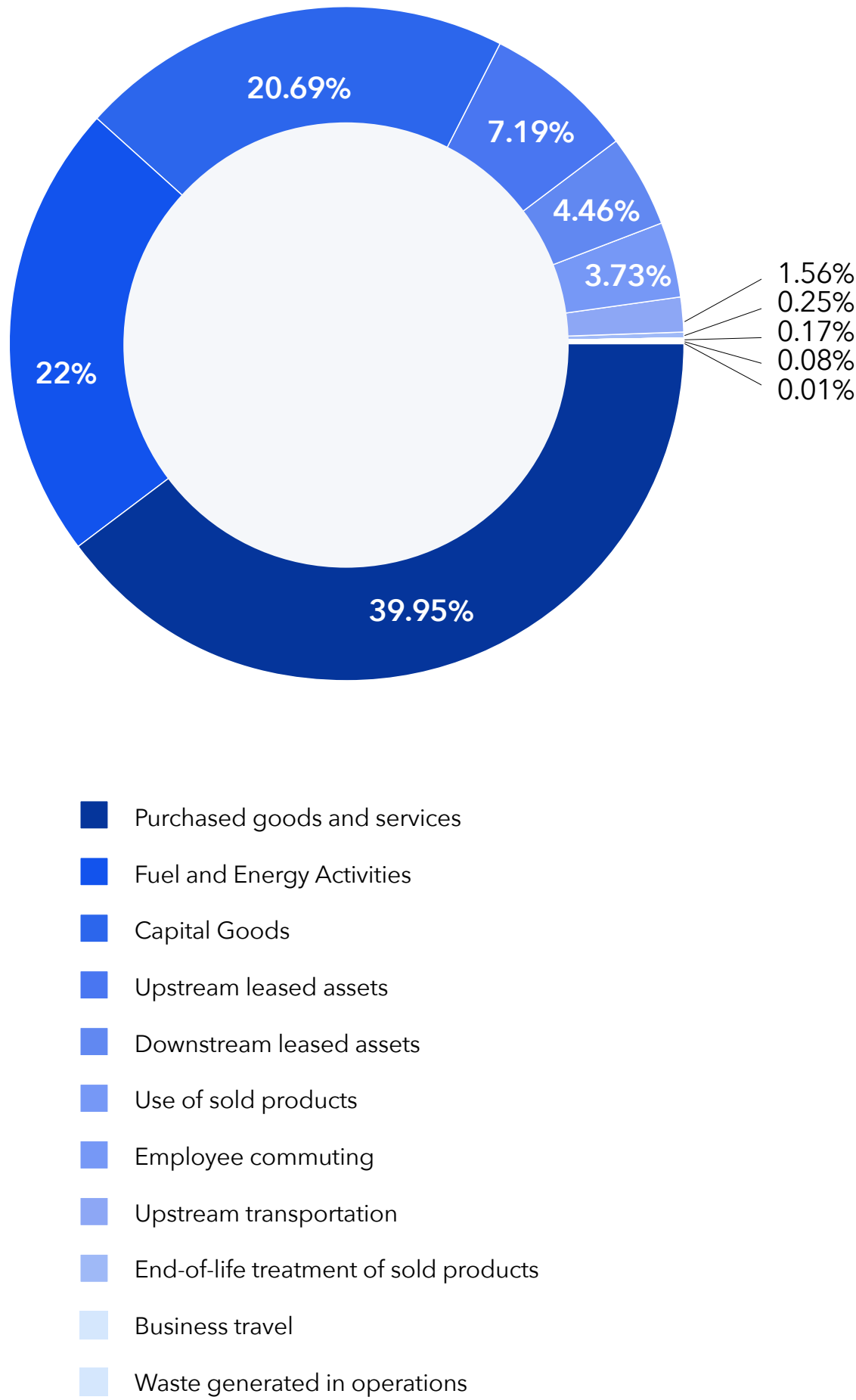
In 2024, Scope 3 emissions decreased by 34% compared to the 2022 baseline.

SCOPE 3 (tCO ₂ e)	2022	2023	2024
Purchased goods, capital goods and services	43,242	27,252	29,362
Fuel and Energy Activities	18,343	13,550	10,666
Upstream transportation	76	81	122
Waste generated in operations	320	52	7
Business travel	28	22	38
Employee commuting	2,024	1,784	755
Upstream leased assets	3,141	3,397	3,484
Use of sold products	1,633	1,193	1,810
End-of-life treatment of sold products	135	99	80
Downstream leased assets	4,572	4,575	2,161
Total emissions (tCO2e)	73,514	52,004	48,486

In 2024, we remained firmly committed to addressing Scope 3 emissions by expanding and refining our emissions inventory.

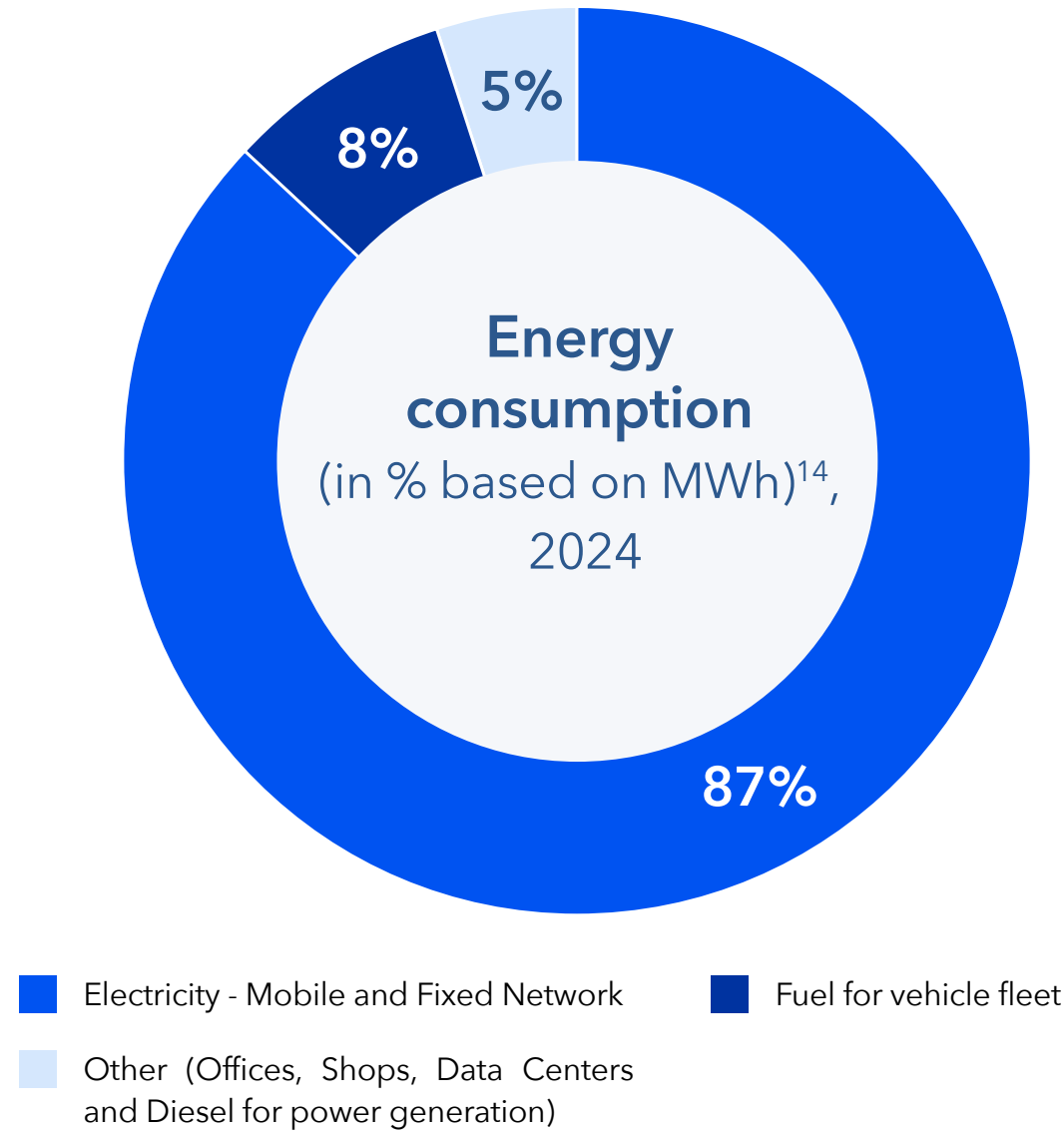
The primary sources of emissions in our value chain stem from the purchase of goods, capital assets, and services. Recognizing the complexity of this challenge, we have adopted a comprehensive approach that involves identifying, measuring, and reducing supplier-related emissions, as well as setting specific reduction targets for our partners.

Scope 3 emissions sources (tCO²e), 2024



Energy use and energy efficiency

Vivacom is committed to improving energy efficiency across its operations, with a focus on optimizing network performance, reducing consumption, and minimizing its environmental footprint. Vivacom’s total energy consumption in 2024 came primarily from electricity used in its technical infrastructure -including mobile and fixed networks, as well as data centers - complemented by fuel for the vehicle fleet and energy for offices, shops, and backup power generation.



* In 2024, nearly half of Vivacom’s network was modernized, introducing energy-efficient solutions such as dynamic shut down functionality that optimizes power use during off-peak hours. As a result, the company achieved energy savings of over 10%, equivalent to around 8,000 MWh for the year.

Mobility

Vivacom is the first telecom operator in Bulgaria to integrate electric vehicles into its operations. The company is starting its transition to e-mobility with 40 new vehicles and is building its own charging infrastructure – 10 stations located at the central office to ensure efficient use. The electric vehicles will serve employees from the B2B division, whose work involves frequent travel.



The initiative is a key element of Vivacom’s environmental strategy and aligns with our long-term commitment to achieving net zero emissions across the entire value chain by 2040, as well as the target of reducing absolute scope 1 and 2 GHG emissions 90% by 2030 from a 2020 base year



Efficiency in our data centers

In recent years, we have been implementing “cold zones” in Vivacom’s data centers as part of our efficient cooling strategy, which improves energy efficiency and reduces operational costs. These measures support our sustainability goals to lower our carbon footprint and comply with international energy efficiency standards.

In 2024, we implemented a new Contribute Building Operation system from Schneider Electric in our data centers. The system provides remote control of infrastructure equipment, temperature management for cold/ hot aisles, alerts for emergencies or temperature changes, individual client access to energy and temperature data for collocated equipment, and energy monitoring capabilities. It also helps identify equipment that needs replacement to improve energy efficiency. Thanks to temperature control and remote management of climate systems, we reduced cooling costs by approximately 2.5%, or 32,272 kWh, across both data centers in 2024.

During the same year, we prepared technical specifications and initiated replacement procedures for the UPS systems in the “West” data center, as well as for climate equipment in two server halls in the “East” data center.

Cold zones containment enables targeted cooling, reducing excess energy use and improving Power Usage Effectiveness (PUE). By separating hot and cold corridors, airflow is optimized, ensuring more efficient cooling, lower air conditioning costs, and reliable operation of heat-generating IT equipment.



Operational improvements

In 2024, we introduced additional measures to enhance energy efficiency, including replacing old lighting at 40 sites with 1,100 new LED fixtures and installing PIR motion sensors to optimize use in buildings with limited occupancy. We also upgraded 485.32 m² of old window frames in offices nationwide with new PVC profiles, which are four times more energy efficient.

Renewable energy

As part of our strategy to use 100% renewable electricity by 2027, in recent years we have focused on shifting towards green energy. In 2024 alone, we invested over BGN 331,000 in the construction of photovoltaic (PV) installations to support our business energy needs. During the year, we completed and commissioned two new rooftop PV installations, fully dedicated to our own consumption and covering part of our operations.



At the end of February, our **Plovdiv** solar installation began operation, featuring 366 panels (total installed capacity 161.04 kWp, 440 W each). During the spring-summer season, it generated 130,509 kWh of electricity.



Simultaneously, we launched our **Varna** solar project, with 174 panels (installed capacity 161.04 kWp, 450 W each), producing 61,144 kWh over the same period. In addition, in 2024 we purchased Guarantees of Origin for 82,000,000 kWh, further supporting our commitment to using clean energy and reducing our carbon footprint.



In addition to Vivacom’s own initiatives, in 2024, United Group inaugurated a photovoltaic power plant near the village of Mogila, Stara Zagora. With a capacity of 3 MW, the plant will provide green energy for Vivacom’s operations and significantly reducing the company’s carbon footprint. Fully financed by United Group, this is the first in a series of projects, with Vivacom positioned as the largest beneficiary in Bulgaria. The facility features 4,648 bifacial high-efficiency panels that capture both direct sunlight and reflected light, maximizing output. It is equipped with an automated real-time monitoring and remote-control system to ensure optimal performance and efficiency. The plant has an annual output of around 4,300 MWh - enough to cover the energy needs of nearly 1,500 households.



Looking ahead

- ✓ Certification under ISO 50001:2018 (Energy Management Systems).
- ✓ Increase of green electricity purchase through Guarantees of Origin
- ✓ Continue expanded sustainable mobility by adding new electric vehicles and building additional company-owned charging stations
- ✓ Implementation of the Recovery and Resilience Plan - execution of the announced tenders for supply and installation of PV systems on 27 base stations.

Circular economy and waste



Highlights from 2024

- ✓ Maintained 100% diversion of operational waste from landfill.
- ✓ Advanced the Copper Cable Scrap Project, dismantling and recycling over 429,000 kg of cables across eight regions in Bulgaria.
- ✓ Refurbished 168,000 customer premises equipment (CPEs).
- ✓ Decommissioned over 125,000 DTH & IPTV set-top boxes thanks to the growing adoption of the Smart TV app, reducing electronic waste.
- ✓ Extended the lifecycle of nearly 800 company computers through resale to employees, with non-reusable devices sent for recycling.

“At Vivacom, connectivity goes hand in hand with responsibility – turning outdated technologies and materials into resources for a more sustainable future.”

Evgeniya Pavlova | Sustainability Manager



Approach and management

In 2024, Vivacom continued to advance its approach to circular economy and waste management, focusing on diverting operational waste from landfill through optimized rource use and expanded recycling initiatives.

Throughout the year, Vivacom maintained a 100% recycling rate of generated waste and remained committed to effective separate collection and material processing. To further enhance its efforts, in 2024 Vivacom started developing a dedicated Waste Management Plan to enable more effective monitoring, collection, and recycling of waste streams.

The company tracks performance through annual data collection, reporting, and analysis, ensuring that all waste from operational and business activities is separately collected and fully recycled in line with its sustainability commitments.

In 2024, Vivacom generated a total of 915 tonnes of waste, all of which was sent for proper treatment and recycling through contracted partner organizations and recovery companies.

Generated and recycled waste in 2024 (tonnes)	
Batteries	155
Cables (copper and optic)	465
Electronic equipment	45
Paper and cardboard	48
Scrap metal	151
Plastic	6
Wood	3
Constuction waste	42
Total waste generated and recycled	915
Total percent of waste recycled	100%

Recycling and recovery initiatives

In 2024, Vivacom reinforced its commitment to the circular economy and sustainable waste management by implementing effective practices across key projects. These initiatives focused on recycling, proper treatment of waste and end-of-life electrical and electronic equipment, as well as the optimization of resource use. Together, they demonstrate how the company integrates environmental responsibility with technological modernization and operational efficiency.

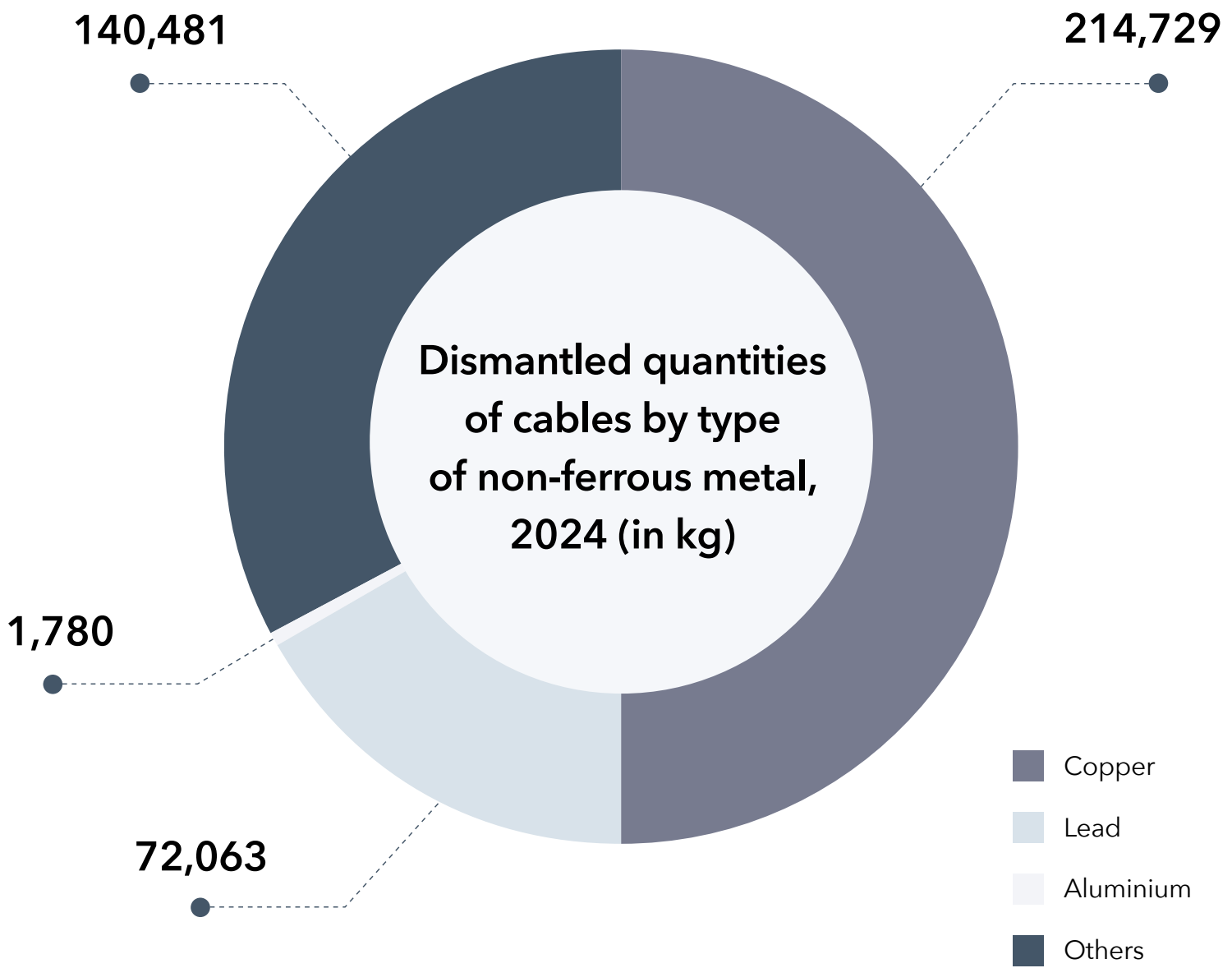
Copper Cable Scrap Project

A long-standing flagship initiative, the Copper Cable Scrap Project focuses on dismantling and recycling obsolete copper cables. This project combines technological modernization with ecological responsibility: freeing up underground network capacity, reducing losses from copper theft, and generating additional revenues from recycling valuable metals. Migration of services to the mobile network and the replacement of copper with optical cables are integral parts of this process.

This initiative delivers significant environmental benefits: reducing soil pollution, eliminating hazardous materials and plastics, saving resources, and enhancing energy efficiency.

In 2024, Vivacom:

- Inspected 238 km of intercity cables.
- Proposed optimization of 188 copper cable routes, 14 of which (13.5 km) were already optimized.
- Dismantled a total of 429 tonnes (429,053 kg) of non-ferrous metal cables across 8 regions in Bulgaria, with a combined length of 204 km (78% urban cable networks and 22% intercity).



Replacement and Recycling of Sector Antennas

The project is linked to the spectrum acquired at the end of 2023 in the 700 and 800 MHz frequency bands. These newly released bands were allocated specifically for the deployment of next-generation technologies such as 5G. Most of the antennas installed in previous years did not support these frequencies, which made their replacement necessary. In 2024 the old equipment was decommissioned and sent for proper treatment.

Performance data from the first 750 upgraded base stations in 2024 showed:

- 48% reduction in network load.
- 118% increase in traffic carried.
- 35% higher average speeds.
- 49% improvement in energy efficiency.



Decommissioning of Technology Premises

In 2024, Vivacom vacated all facilities in a Burgas technology building, optimizing its copper network and relocating active equipment to other sites. In Stara Zagora, Vivacom decommissioned a digital telephone exchange along with the associated technological equipment, including rooftop air-conditioning systems, as part of the broader network optimization process. All metals and electronic waste were sent for recycling in full alignment with the company's 100% waste recycling target. These measures reduced both space occupancy and energy demand for heating and cooling.

Battery Collection

Since 2023, Vivacom has provided dedicated containers in its retail stores for customers to return used batteries. In 2024, this initiative continued, with 2,275 kg of batteries collected and delivered for recovery.



Waste reduction and resource optimization

In 2024, Vivacom advanced its efforts to minimize waste generation and optimize resource use through a combination of customer-focused initiatives, infrastructure modernization, and sustainable product offerings. The company continued the active collection of electronic waste from customers and expanded its refurbishment of customer premises equipment, thereby extending device lifecycles and reducing e-waste. At the same time, a large-scale replacement of sector antennas improved spectrum efficiency and modernized the mobile infrastructure, while the expansion of the Smart TV app further reduced the reliance on physical equipment.

Eco Half SIM

Vivacom became the first telecom operator in Bulgaria to introduce Eco Half SIM cards, made from 100% recycled plastic and half the size of a standard SIM card. According to the manufacturer, these cards reduce carbon emissions by up to 18% compared to Half SIMs, and by up to 43% compared to standard SIMs.

From July 2024 more than 290 000 Eco Half SIM cards have been provided to customers.

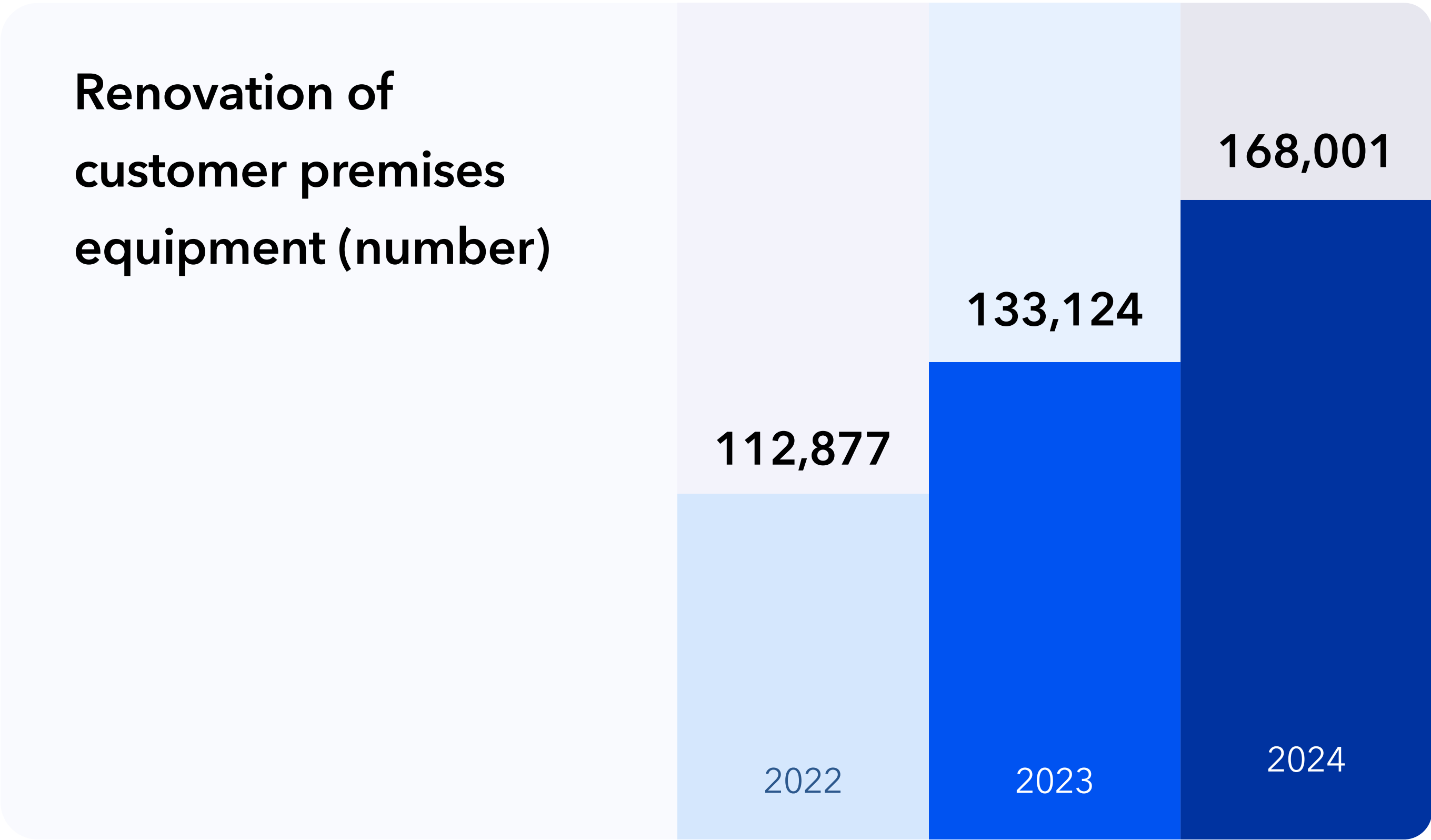
The launch builds on Vivacom’s pioneering introduction of Half SIM cards in November 2023, which already reduced plastic waste by 50% and carbon emissions by 30%. To date, more than 610,000 Half SIM cards have been provided to customers.

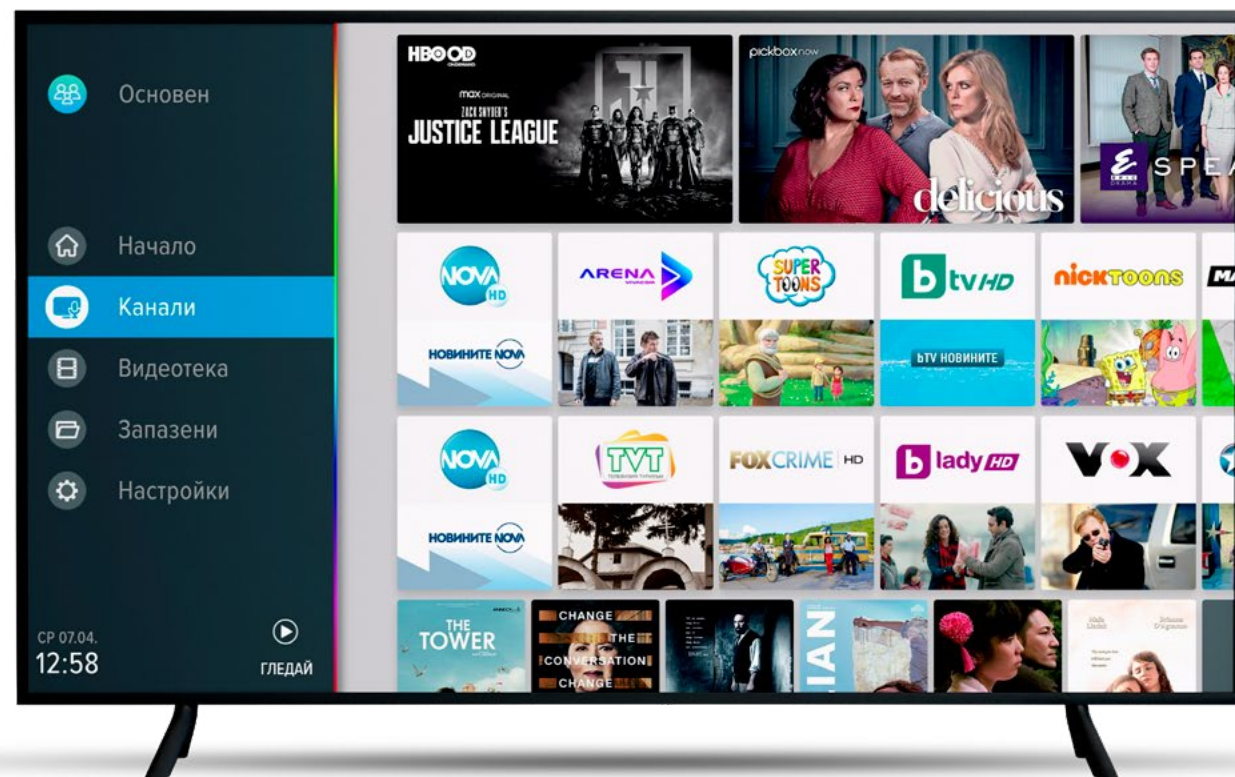


Refurbishment of Customer Premises Equipment (CPE)

Customer premises equipment (CPE), such as wi-fi routers, modems, switches and TV setup boxes, is essential for reliable connectivity. At the same time, these devices can become a considerable source of electronic waste once they reach the end of their lifecycle. To address this challenge, Vivacom applies circular economy principles by extending the lifespan of equipment through refurbishment, thereby reducing e-waste and promoting more sustainable use of resources.

In 2024 alone, 168,000 devices we’re refurbished and have a chance to be used again instead of being scrapped. Refurbished units per year increased with 21% compared with 2023 and 33% compared 2022.

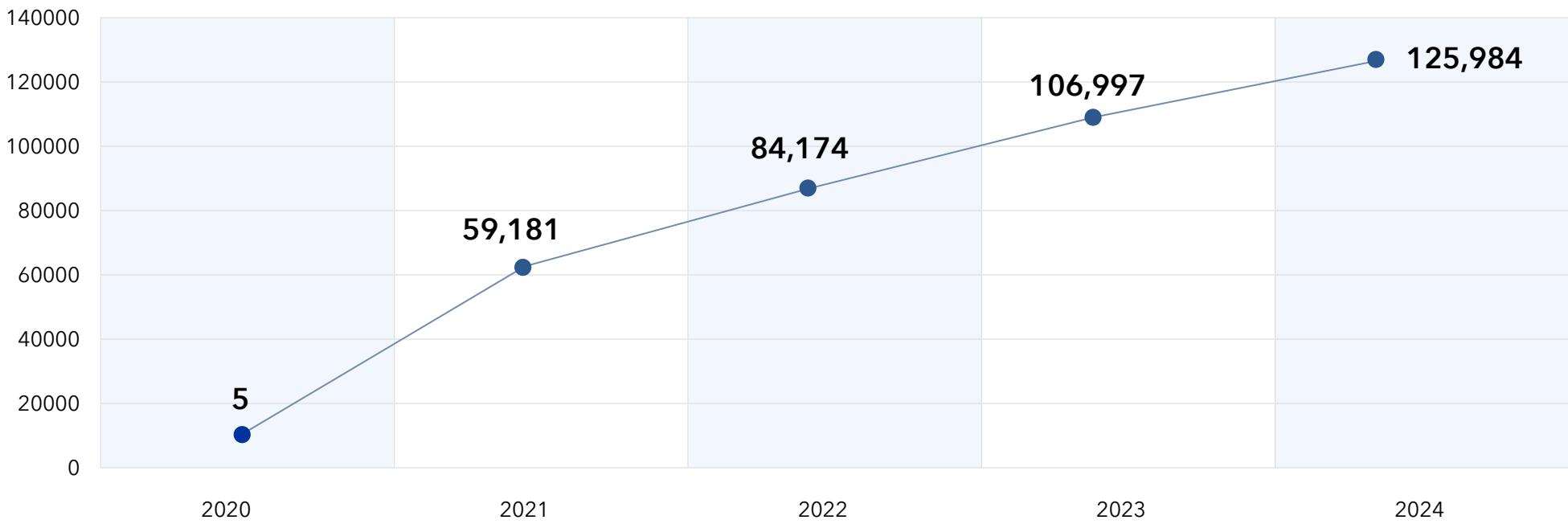




Reducing reliance on physical equipment

The Smart TV app provides direct access to the EON platform on customers’ Smart TVs, eliminating the need for a separate TV receiver and simplifying setup and usage. Meanwhile, the EON mobile app allows users to watch content anytime, anywhere, and on any device, offering maximum flexibility. Together, these apps reduce the reliance on physical equipment. Over the past few years, the number of customers using the Smart TV app has been increasing, leading to a reduction in the use of physical devices. In 2024, a total of 125,984 activations were recorded, which enabled the decommissioning or avoidance of more than 125,000 physical devices . This shift not only simplifies the customer experience but also contributes to reducing electronic waste and optimizing resource use.

Smart TV app activations over the years



Extending the lifecycle of company electronic equipment

Vivacom also continued its established practice of selling used company computers to employees, giving devices a second life and preventing unnecessary e-waste. In 2024, nearly 800 computers were reused in this way. An additional 153 devices that could not be repurposed were responsibly recycled. This initiative is part of Vivacom’s broader commitment to sustainable e-waste management.



Looking ahead

- ✓ Maintain the Group target of diverting 100% of operational waste from landfill by 2030.
- ✓ Launch a Trade-in program allowing customers to return old mobile devices in exchange for a voucher towards a new purchase.
- ✓ Develop and implement a comprehensive Waste Management Plan covering all waste generated from Vivacom’s operational and business activities.

VIVACOM

Social performance

03



**SUSTAINABILITY
REPORT 2024**

Network coverage and reliability

Highlights from 2024

- ✓ 156 new base station locations deployed.
- ✓ Nearly 50% of the mobile network modernized using new frequency bands.
- ✓ Coverage provided to over 1.3 million households with high-speed mobile internet.
- ✓ Over 90,000 households in 23 new settlements added to the FTTH network.
- ✓ Migration of over 52,000 fixed services to modern xPON optical infrastructure, improving quality and reducing costs.
- ✓ Large-scale antenna realignment project completed for 61% of targeted DTH TV antennas, improving coverage and picture quality.

// We are committed to building a future-ready network that provides reliable connectivity to every corner of Bulgaria - from large cities to remote villages. Ensuring seamless service and modern digital infrastructure is at the heart of Vivacom's mission.

Nikolai Gavrilov | Chief Technical Officer



Network coverage and expansion

Vivacom continues to provide one of the most extensive mobile network coverages in Bulgaria. In 2024, the company deployed 156 new base station locations, reinforcing its presence even in remote and underserved areas. Nearly 50% of the mobile network was modernized through the implementation of new frequency bands (800/900 MHz), which significantly enhanced both indoor and rural coverage.



From 2023 to 2024, Vivacom further strengthened its mobile network coverage, reaching nearly full population coverage for 4G LTE (Long Term Evolution) Advanced (97.6%), while expanding 5G NR (New Radio) availability to 91.1% of the population – marking a significant increase from 84.88% in 2023.

	Mobile network population coverage			
	2021	2022	2023	2024
4G LTE Advanced	97.62%	94.46%	96.87%	97.6%
5G	64.16%	77.34%	84.88%	91.1%

Mobile network subscriptions	2021	2022	2023	2024
	3,001,282	3,164,597	3,290,295	3,352,282

As part of its ongoing mobile network development, Vivacom expanded its 5G coverage using C-Band technology (advanced energy efficient wireless solutions) in areas without optical connectivity. In 2024, coverage was extended to over 70,000 additional households, enabling high-speed internet and interactive TV services via the mobile network. This brought the total to 1.3 million households with access to these services.

In 2024, Vivacom continued the expansion of its FTTH (Fiber to the Home) network, delivering coverage to more than 90,000 additional households and enabling high-speed internet and EON services in 23 new settlements. Network capacity was further upgraded for 12,000 households.

By the end of 2024, FTTH coverage reached 1,598,728 households across 68 settlements.

During the year, the company also designed technical plans to extend FTTH coverage to over 100,000 additional households, delivered technical solutions and completed installations for 1,918 business customers, and built optical connections to provide xPON network coverage in 514 newly constructed residential buildings.

The expansion of Vivacom’s FTTH network in 2024 also supports environmental sustainability by enabling energy-efficient broadband infrastructure with lower power consumption than legacy systems. By extending high-speed internet to underserved areas and newly built homes, we promote digital inclusion and long-term social development. These efforts contribute to a more resilient and connected society while reducing the environmental footprint of network operations.

In 2024, the company launched a large-scale project to reorient satellite antennas for DTH (Direct-To-Home) television customers, aiming to improve picture quality, ensure full national coverage, deliver a more stable signal less affected by weather conditions, expand the number of available SD (standard definition) and HD (high definition) channels, and provide access to more free TV content. By the end of 2024, 61% (almost 200,000 antennas) of the targeted antennas had been redirected. The project will continue in 2025 and 2026, including customers from the newly integrated Bulsatcom operations.

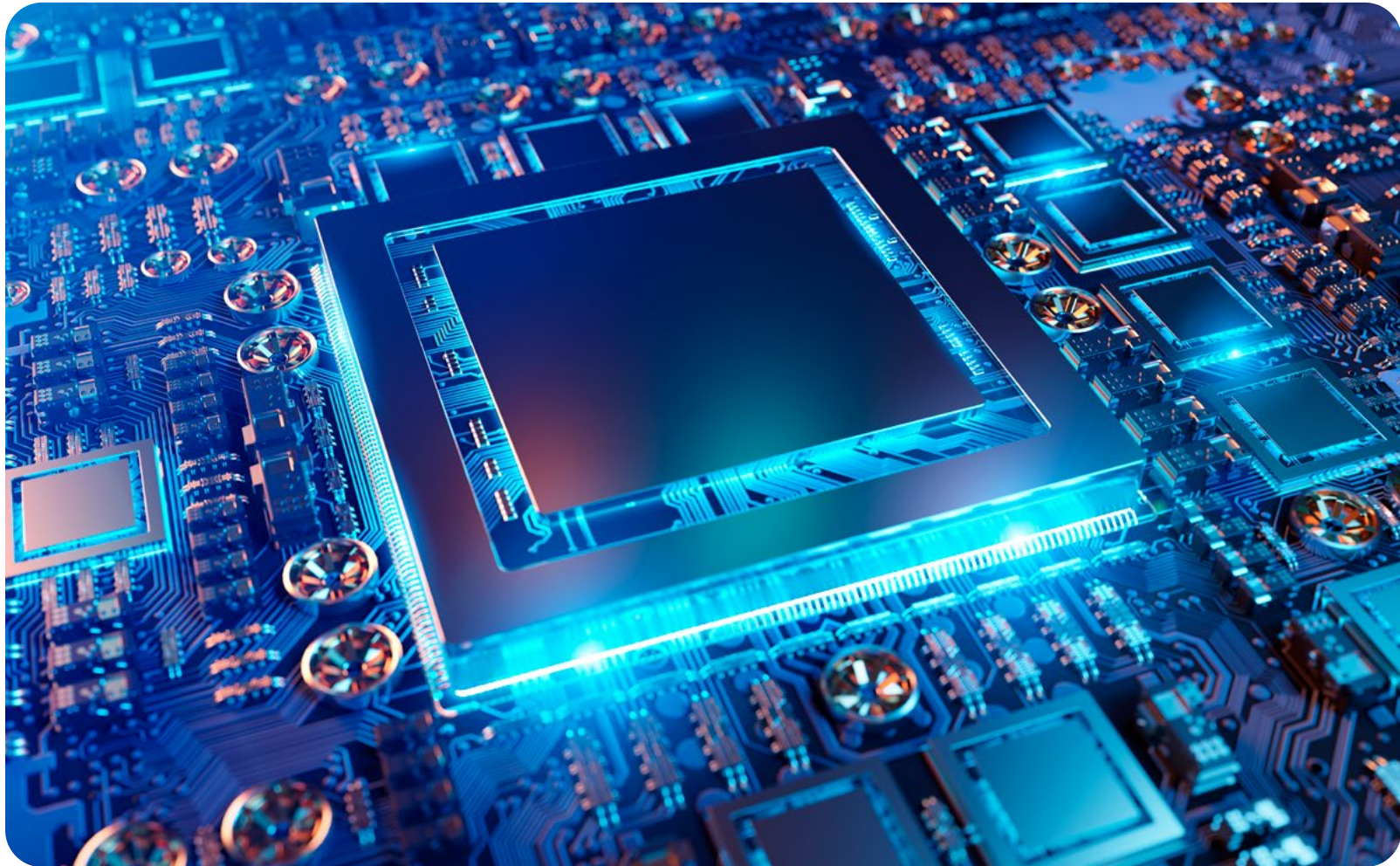


Network reliability and modernization



Nearly 50% of Vivacom’s network underwent modernization in 2024, with energy-saving features (dynamic shutdown) fully optimized to reduce power consumption during off-peak hours. These measures led to energy savings of more than 10% (around 8,000 MWh) throughout the year.

In its fixed network segment, Vivacom migrated over 52,000 services from acquired operators and legacy infrastructures, including ADSL (Asymmetric Digital Subscriber Line), VDSL (Very-high-bit-rate Digital Subscriber Line), and FTTB (Fiber To The Building) technologies, to its modern xPON optical network. This migration improved service quality and speed, reduced maintenance costs, and enabled the provision of advanced services such as 4K video, cloud applications, and smart home solutions.



As part of its backbone network modernization project, Vivacom partnered with Nokia to implement the latest cloud-based NFVi (Network Functions Virtualization Infrastructure) technology and cloud-native functions built on Kubernetes. This upgrade included the deployment of advanced technologies such as 5G Standalone Packet Core, modernized Subscriber Database Management, IP Multimedia Subsystem for higher-quality calls and lower latency, and a flexible cloud infrastructure replacing traditional physical network equipment. These improvements enhance network performance, enable faster, more reliable, and higher-quality services, increase network efficiency and scalability, and ensure compliance with EU requirements for the use of trusted, non-EU vendors. By shifting to virtualized and cloud-native infrastructure, Vivacom also reduced its energy consumption and hardware waste, contributing to a more sustainable and environmentally responsible network footprint.



Looking ahead

- ✓ Expand FTTH (Fiber To The Home) coverage to over 100,000 additional households.
- ✓ Finalize the remaining phases of the antenna realignment project, including legacy Bulsatcom clients.

In 2024, Vivacom invested 14.5 million euro in expanding and upgrading its FTTH (Fiber To The Home) network, 1 million euro in projects for business clients and residential buildings to enhance service coverage, and 510,000 euro in optical connectivity to support the expansion of its 5G network.

Quality services

Highlights from 2024

- ✓ Customer satisfaction (CSAT) reached 86%, the highest since the metric was introduced.
- ✓ Over 1,000 internal procedures and guidelines created or updated to ensure consistent service quality.
- ✓ New automated post-sales options and self-service TV add-ons introduced via My Vivacom.
- ✓ Enhanced mobile diagnostics and automated client notifications for faster issue resolution.
- ✓ Over 30,000 VOD titles available on the upgraded EON platform, with new libraries and features like Watch Offline.
- ✓ Successful integration of Bulsatcom and Networx, ensuring continuity and expanded service options.

“Quality is not an act, it is a habit – and for us, it’s a promise we keep to every customer, every day.

Stoyan Karanlakov | Chief Commercial Officer



Continuous service quality improvement

Vivacom’s commitment to service quality is built on an ongoing cycle of listening, analysing, and improving. Feedback is collected proactively across multiple channels – online, over the phone, and in writing, ensuring that customer insights directly influence decision-making. This approach drives improvements both in the technological dimension (signal quality, connection speed) and the operational dimension (service accessibility and ease of use).

Within the company, we use several approaches to gather feedback from our customers:

- Post-interaction surveys: After a customer engages with any of our touchpoints, we send a short survey to collect impressions about our employees’ performance and the overall perception of Vivacom.

- Annual feedback check: If a customer has not contacted us within 12 months, we send a brief survey to gather their views on Vivacom.
- Business customer interviews: For our business clients, we conduct additional phone surveys to obtain more detailed insights into their experience with us.

To track performance, Vivacom monitors key satisfaction indicators on a daily basis, enabling rapid response to both positive and negative changes.

Indicator		2024 results	
	Customer satisfaction and loyalty	tNPS /Transactional Net Promoter Score/	55.49 /based on over 260,000 customer responses/
	Satisfaction with a specific product, service, or interaction	CSAT /Customer Satisfaction Score/	86% /the highest since the indicator was introduced/
	Long-term loyalty and overall satisfaction with the Vivacom brand	rNPS /Relational Net Promoter Score/	8.27 /reflecting strong long-term loyalty/

Internal processes play a crucial role in maintaining these standards, encompassing procedures and guidelines that provide information on the quality of services delivered and the customer experience. In 2024 over 1,000 internal procedures and guidelines were created or updated to ensure employees have the most up-to-date information. These include:

- Enhanced checklists for regional managers and store managers that include specific requirements for acquired operators.
- Refined sales targeting and reporting mechanisms to boost efficiency and reward performance improvements.

Excellence in customer experience

Vivacom continuously enhances the customer journey by combining technology, process optimization, and employee development. We rely on several key elements to build an effective system for implementing improvements:

- **Customer feedback:** We primarily draw on the insights gathered from our clients.
- **Expert monitoring:** Our specialists perform daily monitoring of all indicators and parameters to identify areas that require change and development.
- **Industry trends:** We continuously track global trends in the sector and strive to adapt the best practices to our company.

In 2024, we introduced a series of initiatives aimed at enhancing our customer service experience. These improvements focused on automation, process optimization, employee training, and better access to services for our clients.

Key measures to enhance the customer experience in 2024	
Automated post-sales options	We added new automated options in the voice menu, allowing clients to request services independently and more quickly.
Enhanced mobile diagnostics	Processes for mobile service diagnostics were improved to collect more detailed information and ensure faster escalation to the relevant experts.
Automated client notifications	Additional automatic notifications were implemented for customers experiencing difficulties with fixed-line services, including options to manage on-site technical visits online.
Self-service TV add-ons	Clients can now request one-time additional TV service packages directly through the My Vivacom self-service portal.
Faster invoice notifications	Notifications for issued invoices are now sent more promptly to mobile service clients.
Automatic device limit updates	Purchase limits for devices are automatically updated when a customer returns a device.
Comprehensive client history access	All customer touchpoints that directly serve clients now have access to complete client history.
Employee training and store organization	Staff received training on services from newly acquired operators, and store organization was improved to increase efficiency, customer retention, and satisfaction.
Store relocation and expansion	Prior to merging with Networx and Bulsatcom, selected stores from acquired operators were relocated or expanded.
Enhanced in-store capacity	Additional workstations were added to stores to handle the increased customer load from acquired operators.
Staff reallocation	Sales staff were reassigned to stores with higher customer traffic to improve service levels and meet demand.

Innovating for better services

In 2024, Vivacom delivered a series of service enhancements and product innovations, all designed with customers’ evolving needs in mind. The introduction of Unlimited mobile plans brought double internet speeds, roaming in 13 non-EU countries, and flexible “speed boosters” available for weekends, single days, or week-long periods. New roaming bundles offered affordable options for destinations where previous alternatives were costly, while prepaid packages became even more accessible for tourists and customers preferring contract-free services.

Network capabilities expanded significantly, with wider 10GIGA and 5G coverage, including new 5G FWA (Fixed Wireless Access) sales points. The rollout of Wi-Fi 6 routers provided customers with stronger, more reliable home connectivity. Seasonal initiatives, such as free access to all TV channels and on-demand libraries during the Christmas campaign, enriched customer experiences.

A key milestone was the seamless integration of Bulsatcom and the fourth local competitor, Networx, into Vivacom’s systems, ensuring service continuity and giving customers the option to retain their existing contract terms. Alongside this, Vivacom streamlined its commercial portfolio, preventing sharp bill increases at the end of contracts and improving transparency.

2024 also marked significant progress on previously set goals. The EON platform was enhanced with VOD 2.0 – a completely redesigned video-on-demand experience offering features such as Watch Offline, Skip Intro, intelligent recommendations, and curated collections. The content catalogue grew to over 30,000 titles, complemented by two new thematic libraries: NOVA DOKU, featuring European documentaries, and Duck OD, a safe environment with educational content for children.

Vivacom also expanded its proprietary product line, launching the Vivacom 5G Pro smartphone with improved camera, larger memory, eSIM support, and sleek design. This was accompanied by stylish, durable Bluetooth earbuds and a children’s smartwatch, enabling safe real-time communication between kids and parents – an offering that blends innovation with accessibility.



Looking ahead

- ✓ Expand the EON service with more channels, richer content, and enhanced quality, incl.:
 - Increase the number of channels in all EON packages, including additional HD options,
 - Continuously refresh the content to offer new and inspiring titles,
 - Add specialized channels (such as Oh! Jazz), along with a dedicated video library curated for music lovers.
- ✓ Enrich the video-on-demand portfolio with new thematic libraries, incl.:
 - Anime – a world of Japanese animation, characters, and emotions,
 - Hunting & Fishing Club – for nature and adventure enthusiasts,
 - Viasat Kino – with carefully selected films for cinema lovers.
- ✓ Improve service accessibility on smartphones through the introduction of Real-Time Text (RTT) in collaboration with leading device manufacturers.

Cyber security



Highlights from 2024

- ✓ New group-wide cybersecurity policies
- ✓ Advanced endpoint & server protection (Endpoint Detection and Response (EDR), Advanced Web Application Firewall (AWAF), Network Detection and Response (NDR))
- ✓ Internet access filtering system
- ✓ Phishing simulations for employees
- ✓ Upgraded Data Loss Prevention (DLP) system
- ✓ Stricter external storage policies
- ✓ Zero major cybersecurity incidents in 2024

Cybersecurity is something we build every day – not just through technology, but through culture, awareness, and responsibility. Every employee plays a role in keeping data secure and earning our customers’ trust.

Dimitar Radev | Senior Manager



Cybersecurity approach

Data is at the core of our operations and is regarded as a key asset that requires the highest level of security and protection. We acknowledge both the legal and ethical responsibility to safeguard our customers’ information, and our goal is to preserve their trust through effective privacy and security measures.

Vivacom applies a comprehensive and multi-layered approach to cybersecurity, combining technical, administrative, physical, and organizational measures to protect its information assets. The company invests in advanced technologies and processes that ensure reliable protection against cyber threats, as well as in training and policies that raise employee awareness and responsibility. This framework ensures both resilience and compliance with best practices.

Key components of our approach include:

Technical measures

- Endpoint and server protection (EDR)
- Application-level firewalls for critical systems (AWAF)
- Malware detection and filtering (Antivirus/ Antispam, NDR)
- Data loss prevention (DLP)
- Network segmentation (SDN)
- Secure PKI system for SSL certificates
- Multifactor authentication for VPN access
- Identity and access management platform
- Web proxy filtering for employee internet access
- Document protection (AIP)
- Regular software updates for endpoints and servers
- Regularly tested data backups
- "Mail traffic protection"

Administrative measures

- Information and cybersecurity policies
- Access management processes
- Regular vulnerability assessments
- Employee training programs
- PCI DSS desertification

Physical and organizational measures

- Controlled physical access to critical infrastructure
- Monitoring and logging systems
- Established incident response procedures

The company has established a method to measure the effectiveness of selected control mechanisms, ensuring that security requirements are met. This allows evaluation of implemented controls, risk management, and the information security management system. The assessment relies on key indicators collected from incidents, audit reports, system logs, hardware failures, and other relevant sources.

Cybersecurity effectiveness is measured by:

- Classification of information based on regulatory requirements, value, criticality, and sensitivity.
- User authentication and access rights to systems.
- Inclusion of security requirements in supplier contracts.
- Clearly defined responsibilities and procedures for incident response.
- Average downtime and protection of assets during interruptions.
- Confidentiality and non-disclosure agreements, regularly reviewed and documented.
- Physical access control and protection against unauthorized entry.
- Protection against external threats and natural disasters.
- Clean desk and clean screen policy.
- Protection against power failures and other utility system disruptions.
- Endpoint protection.
- Malware control mechanisms, combined with user awareness.
- Regularly tested backups of data, software, and system images, in line with the backup policy.

Cybersecurity in action

Information security risks are managed through an annual assessment of potential threats, possible incidents, and their likelihood - both at the company and group level. Control measures are applied to avoid, reduce, and address risks, alongside mechanisms for monitoring and detecting incidents. A group-wide SIEM (Security Information and Event Management) implementation project is currently underway, supported by the development of incident response procedures and plans.

In 2024, Vivacom strengthened its cybersecurity posture by introducing new group-wide information and cybersecurity policies and implementing several key initiatives. These included a comprehensive protection system for endpoints and servers against cyberattacks, incorporating solutions such as EDR, AWAF, Antivirus/Antispam, and NDR. A new internet access filtering system was introduced for employees to enhance browsing security. Phishing simulation exercises were conducted to raise awareness and improve employee readiness to respond to such threats.

Other major achievements include a full review and upgrade of the Data Loss Prevention (DLP) system, along with the introduction of stricter policies governing the use of external data storage devices.

The company also continued to invest in employee awareness, delivering regular GDPR training and preparing to roll out group-wide cybersecurity training to foster a strong security culture.

Importantly, no major cybersecurity incidents were registered in 2024, confirming the effectiveness of the implemented measures.



Looking ahead

- ✓ Improvement of the data loss detection and prevention system.
- ✓ Implementation of a vulnerability management and assessment program.
- ✓ Regular penetration testing.
- ✓ Implementation of a Security Information and Event Management (SIEM) system.
- ✓ Planned implementation of a group-wide Privileged Access Management (PAM) solution.
- ✓ Regular information and cybersecurity training for all employees.



Data privacy



Highlights from 2024

- ✓ Established a company-wide network of privacy champions supporting daily data protection activities.
- ✓ Detected 112,591 fraudulent calls and blocked 15,188 malicious SIM cards, preventing 587 telephone fraud cases in cooperation with the Ministry of Interior.
- ✓ Delivered five data privacy training modules, reaching 5,648 employees and totaling 5,701 training hours.
- ✓ Strengthened risk management through continuous monitoring, clear incident response procedures, and effectiveness indicators.



We are strongly committed to personal data protection: innovative in approach and responsible in action.

Tsvetina Lungarova | Data Protection Officer



Data privacy management

Vivacom has implemented a robust and comprehensive framework of internal policies and procedures that govern the processing of personal data across all business operations. These internal controls are designed to ensure predictable and well-managed activities, support the principle of data minimization, and uphold full compliance with the General Data Protection Regulation (GDPR). They cover areas such as lawful basis for processing, retention periods, access controls, and risk mitigation measures, and are regularly reviewed to reflect changes in legislation and operational needs.

In addition to these internal mechanisms, Vivacom ensures transparency through the publication of its Data Protection Policy, which is available both online and in all retail locations. This policy serves as a key instrument for informing data subjects about the purposes of processing, categories of data collected, legal bases, data sharing practices, and their rights under the GDPR.

Vivacom demonstrates its strong commitment to data privacy through robust governance practices and strict compliance with international standards. The company adheres to ISO 27001 (Information Security Management Systems), holds ISO 27018 (protection of PII in public clouds), ISO 27701 (privacy information management, extension of ISO 27001), and ISO/IEC 20000-1 (service management system requirements). These certifications confirm Vivacom’s systematic and globally aligned approach to information security and privacy.

In 2024, Vivacom continued to develop and reinforce its internal framework for safeguarding personal data. At its core stands the Data Protection Officer (DPO), who reports directly to the CEO, is registered with the Commission for Personal Data Protection (CPDP), and whose contact details are available in all privacy policies, ensuring transparency and accessibility. Vivacom provides the DPO with the necessary resources and direct involvement in operational processes, allowing privacy considerations to be integrated from the design stage of new initiatives.

To support the DPO’s work, in 2024 Vivacom established a network of so-called “privacy champions.” These are employees from various operational units who are directly involved in supporting the DPO in day-to-day activities. They act as a link between the central data protection function and individual teams, providing guidance, answering questions, and assisting in resolving cases related to the processing of personal data.

To facilitate the exercise of data subject rights, Vivacom has established clear and accessible procedures. Individuals may submit requests related to access, rectification, erasure, restriction, portability, or objection through multiple channels: in person at any Vivacom store, via email to the Data Protection Officer at dpo@vivacom.bg, or through designated digital platforms. These channels are designed to ensure that all requests are handled in a timely, secure, and compliant manner, in accordance with applicable legal obligations.

Employee training is another key element of Vivacom’s data protection strategy. Every employee undergoes at least one training session per year, which may be introductory, refresher, or specialized, depending on their role and needs. In 2024, special attention was given to the privacy champions, who received additional training tailored to their specific responsibilities. This not only enhanced their expertise but also strengthened the organization’s capacity to respond effectively and promptly to questions or risks related to personal data.

Building on this approach, in 2024 Vivacom delivered five distinct training modules covering key aspects of data protection. A total of 5,648 participants took part in these sessions, amounting to 5,701 training hours.

Breakdown of data protection trainings conducted in 2024		
Training topics	Participants	Total hours
Principles and legal basis for processing	27	54
Data subjects' rights & DPO role	26	52
Basic Data Protection (incl. self-assigned)	890	890
Specialized Data Protection	607	607
Refresher Training	4,098	4,098
Total	5,648	5,701

Customer data protection measures

Protecting customers’ personal data goes beyond compliance and employee training – Vivacom also implements practical measures to safeguard subscribers from security threats.

Since 2019, the company has been providing daily data to the General Directorate of the National Police on detected attempts of telephone fraud. In 2024, a total of 112,591 fraudulent calls were detected – more than 3.5 times the number reported in 2023 – and access to the Vivacom network was restricted for 15,188 Romanian SIM cards. As a result of this active cooperation with the Ministry of Interior, 587 telephone fraud cases were prevented in 2024.

Additional measures include strict procedures for SIM card (physical or eSIM) replacement, which can only be requested by the account holder or a legally authorized representative. Replacements are carried out exclusively in Vivacom stores upon presentation of a valid identity document, which is automatically verified through system integration with the relevant authorities. These controls help prevent unauthorized access to customer services and protect sensitive data.



Managing risks and ensuring effectiveness

Vivacom applies a set of technical and organizational measures to manage data protection risks. These include continuous monitoring, regular employee instructions, and direct support from privacy champions in daily operations.

When signals related to data security and privacy arise, a clearly defined process is followed. Each signal is carefully reviewed, and if confirmed, specific actions are taken in accordance with the nature of the risk and the applicable legal requirements. This ensures that the response is timely, appropriate, and aligned with the actual situation.

In 2024, Vivacom received 33 substantiated complaints concerning breaches of customer privacy from external parties, 5 substantiated complaints from regulatory bodies, and identified 9 data leaks (no thefts or losses were recorded). All cases were investigated and addressed in line with the company’s incident response procedures.

To track the effectiveness of the implemented measures, Vivacom follows a set of quantitative and qualitative indicators, including those defined by relevant standards and best practices. These indicators enable an objective assessment of performance and are periodically reviewed to ensure they remain aligned with current needs and emerging risks. This approach ensures flexibility and resilience in the data protection system, making it capable of adapting to a changing environment and evolving requirements.



Looking ahead

- ✓ Continue to strengthen data protection framework through regular review and update of personal data records to ensure accuracy, relevance, and necessity.
- ✓ Implement advanced tools for quantitative analysis of data protection activities to improve performance insights, risk assessment, and compliance monitoring.
- ✓ Reinforce privacy-by-design and privacy-by-default approach by embedding safeguards in product and service development, introducing Privacy Engineer role, and integrating additional controls through the data lifecycle.

Digital inclusion

Highlights from 2024

- ✓ Expansion of mobile and fixed network coverage in rural areas.
- ✓ Supported SMEs with connectivity and digital solutions
- ✓ Supported public sector digitalization, including the BG Alert emergency system.
- ✓ Implementing 5GEDGE4HEALTH project, deploying 5G and edge infrastructure for telemedicine.

// Access to reliable digital services is a fundamental right in today's society, and we are committed to ensuring that every community in Bulgaria - urban or rural - can benefit from it.

Janet Zaharieva | Chief Regulatory Advisor to the BoD



Expanding access and affordability

In 2024, Vivacom continued its mission to ensure equal digital opportunities across Bulgaria. A central element of this commitment is the expansion of 5G coverage, which reached 91.1% of the population by the end of the year – a notable increase compared to 2023. With 156 new base stations deployed, coverage was strengthened in rural and remote areas, supporting the goals of the National Recovery and Resilience Plan and contributing to the EU’s Digital Decade target.

In parallel, Vivacom invested in fixed broadband infrastructure, extending its FTTH network. During 2024 alone, over 90,000 households in 23 new settlements gained access to high-speed fibre, while more than 52,000 legacy services were migrated to modern xPON optical infrastructure. These upgrades not only improve service quality and reliability but also make advanced services – from cloud applications to smart home solutions – available to more communities.

National Recovery and Resilience Plan

Vivacom supports Bulgaria’s NRRP by expanding high-speed connectivity and deploying advanced digital infrastructure, helping modernize public services and enable economic growth, particularly in underserved areas.

EU’s Digital Decade target

Vivacom contributes to the EU’s Digital Decade goals by providing widespread gigabit-capable 5G networks, supporting digital skills development, and enabling businesses and public institutions to adopt innovative digital solutions.

In 2024, Vivacom continued to support service affordability by offering preferential tariffs and discount packages for vulnerable households, ensuring access to essential connectivity for all segments of society even amid economic pressures. The company also supports small and medium-sized enterprises (SMEs) by providing connectivity solutions such as FWA 5G and high-speed fiber packages (1 Gbps, 2Gbps and 10 Gbps), as well as digital solutions that enable cloud computing and hosting. Vivacom’s cloud platform offers IaaS (Infrastructure as a Service) services for computing power and data storage, and in 2024 it was used by more than 250 SME clients. Overall, the company provided connectivity and digital services to more than 109,000 SME customers across Bulgaria, helping them adopt new technologies, enhance competitiveness, and close the gap with larger businesses in the digital economy.

Building on this commitment to inclusivity, Vivacom also provides special social plans for disadvantaged individuals and those included in the national social assistance program. Customers who present official proof of eligibility can access a limited fixed voice plan at preferential terms. In addition, Vivacom offers tailored plans for customers with disabilities, including two mobile and three fixed voice packages. Individuals with visual, hearing, or other types of disabilities equal to or above 50% are entitled to conclude one contract for fixed services under these special plans. These initiatives¹¹ ensure that people in vulnerable groups have equal access to affordable communications and can stay connected.

Vivacom actively monitors its contribution to Bulgaria’s progress in the Digital Economy and Society Index, focusing on improving digital connectivity and access. Special attention is given to smaller towns and rural areas, where challenges in adopting new technologies remain significant.

¹¹ The terms and conditions for the [social plans](#) and [plans for people with disabilities](#) are available on Vivacom’s website.

Supporting digital future

Vivacom plays a leading role in advancing Bulgaria’s digital ecosystem. In close partnership with local municipalities, and state institutions, the company delivers tailored solutions that support the digitalization of public services.

A notable example is the BG Alert system of the Ministry of Interior, where Vivacom provided full technical support to ensure the reliable distribution of emergency messages to citizens nationwide.

Beyond this, the company has implemented a wide range of smart solutions in collaboration with municipalities and public institutions. These include a call center solution for the State Agency for Child Protection supporting the pan-European number 116 111, on-premise fleet management systems with enhanced data security for ministries and agencies, and CCTV (Closed-Circuit Television) systems for more than 30 municipalities. Vivacom has also deployed managed Wi-Fi solutions in over 400 schools, air quality monitoring systems in Blagoevgrad, Sofia (in partnership), and Targovishte, as well as smart waste management solutions in Sofia and Burgas. Further projects include smart parking systems introduced in municipalities, universities, and hospitals, enhancing the efficiency and digitalization of public services and urban infrastructure.



In 2024, Vivacom also invested in projects of both national and European significance. The company was selected as implementer of a project under the EU’s Connecting Europe Facility (CEF) programme -5G4HEALTH which holds strategic importance for local communities and the economy.

European digital project in 2024 with Vivacom as key partner

5GEDGE4HEALTH (CEF Digital)



Partners:

- | | |
|--------------------------|------------------------------------|
| • Vivacom Bulgaria | • Dr. Assen Zlatarov University |
| • Municipality of Burgas | • Southeast Digital Innovation Hub |

Objectives:

The project aims to implement high-capacity 5G and edge infrastructure in the Burgas region to enable innovative smart healthcare services. The project targets 34 remote settlements, focusing on pediatric telemedicine. It connects a new Telemedicine Centre at St. Anastasia Hospital in Burgas with 10 local health centers and provides 24 villages with 5G-equipped mobile medical units. Two pediatric use cases (remote consultations for health monitoring, periodic check-ups, and emergency care) will be developed and validated through the high-speed network and edge infrastructure. Edge computing will allow real-time processing and analysis of patient data, supporting faster, more informed diagnostic and treatment decisions.

Activities and results:

- Improving pediatric healthcare through telemedicine services.
- Deployment of new 5G sites and upgrade of existing ones using the 3.6 GHz band to provide high-capacity coverage in 34 settlements in the Burgas region.
- Implementation of a high-capacity 5G network architecture supporting innovative telemedicine functions.
- Infrastructure includes 5G base stations, fiber-optic (FO) cables for end-to-end protection and high availability, and equipment for data transmission and reception.

Looking ahead

Vivacom will continue investing in:

- ✓ Expanding 5G and FFTH coverage to underserved areas.
- ✓ Supporting affordability initiatives for vulnerable groups.
- ✓ Partnering with public institutions to accelerate the digitalization of services.

Vivacom was also selected as the contractor for another project of strategic importance under the EU Connecting Europe Facility (CEF) program - 5GTRACKS in a consortium with NOVA (Greece) and Bulgarian Road Infrastructure Agency (API).

Smart solutions and innovations

Highlights from 2024

- ✓ New waste management concept launched, supporting municipalities to increase separate collection rates.
- ✓ Vivacom Cloud platform expanded, serving over 300 business clients.
- ✓ RPA(RoboticProcessAutomation)solutionsdeployed, automating processes in private and public sectors.
- ✓ Technology contribution for industrial sensors and monitoring systems, enabling safe and efficient CO₂ storage and analysis.

// Innovation is at the core of our business, enabling us to provide smart solutions that make cities more sustainable and businesses more efficient.

Nikola Gechev | Corporate Sales Director



Smart solutions for municipalities and businesses

Vivacom actively develops and implements smart city and digital business solutions that enhance efficiency and sustainability. Over the years, the company has partnered with municipalities and technology companies to design and manage intelligent systems for monitoring and control in waste management, water management, air quality and other sectors.

In 2024, the company introduced a new waste management concept for municipalities. The system establishes an innovative approach to waste collection, designed to increase separate collection and recycling rates and strengthen monitoring and control. It has been developed in partnership with Vem Technology and Theoremus and is intended for use by municipal authorities and waste collection companies.

Municipal waste management projects in 2024		
Type of activity	Scope and coverage	Key features
Municipal waste collection	3 districts in Sofia 1,500 containers	Integration with collection trucks, passive sensors on all containers, web interface for municipal users. <i>Partner - Theoremus</i>
Separate waste collection	- Entire city of Burgas 2 districts in Sofia	Vivacom in-truck equipment, passive sensors on all containers. <i>Client - Ecopack</i>

Alongside municipal partnerships, Vivacom also supports corporate clients with smart digital solutions that combine innovation and measurable sustainability benefits.

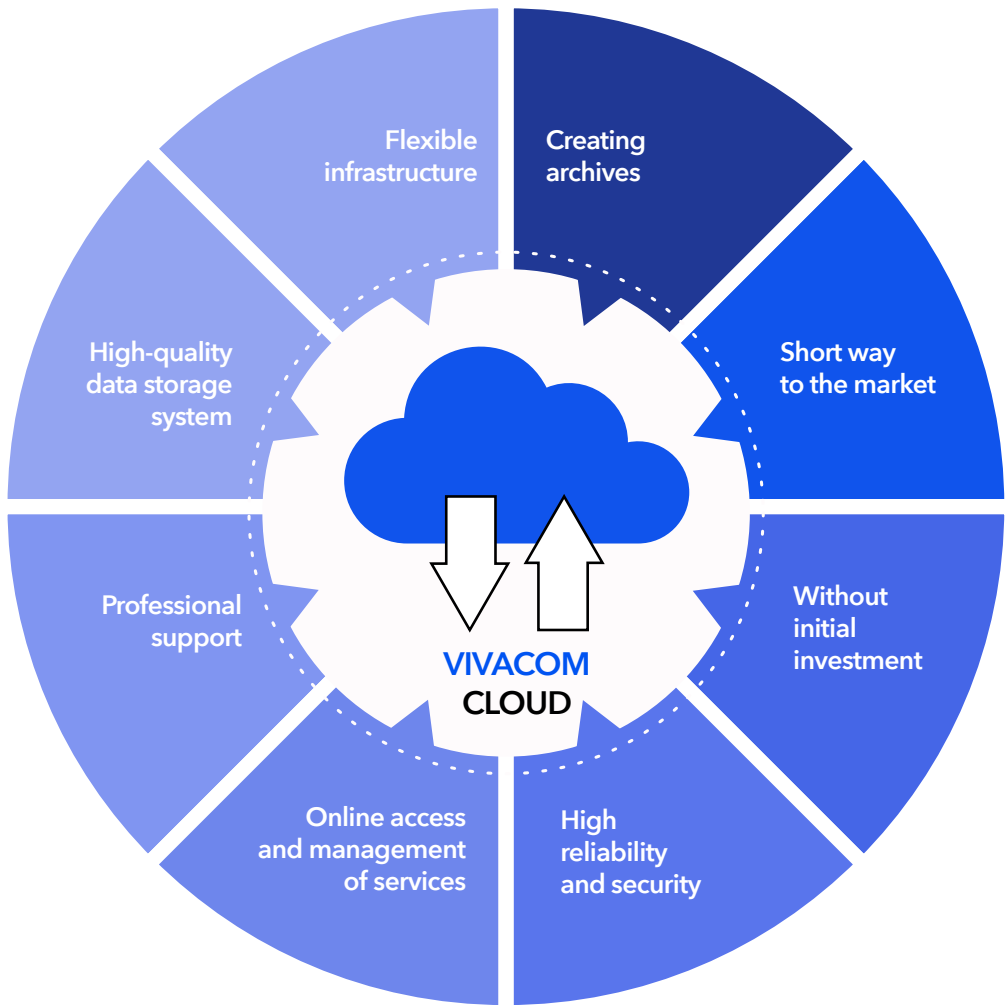
Pateplay Project (Cloud IaaS)

Pateplay Group, a Sofia-based software development company in the iGaming industry, relies on Vivacom’s flexible and secure Cloud IaaS solutions to support its global operations. By migrating from on-premise infrastructure to Vivacom’s cloud platform, Pateplay significantly optimized its energy use – saving approximately 52,000 kWh annually and reducing CO₂ emissions by around 15 tons. Cloud infrastructures are up to 80% more energy efficient due to resource sharing and modern data centers with low Power Usage Effectiveness (PUE). Through this collaboration, Pateplay benefits from reliable cloud infrastructure while achieving measurable reductions in energy use and emissions.

In 2024, the Vivacom Cloud platform continued to grow, now serving more than 300 corporate clients with scalable and secure virtual data centers. The service provides cloud-based computing infrastructure with shared resources tailored to the needs of business clients. In partnership with Mainstream, part of the UG group, Vivacom successfully implemented several new cloud infrastructure projects during the year, supporting companies across different industries with solutions for databases, SAP systems, e-commerce platforms, web and mail servers, containerization, and development IT environments.

Additionally, in 2024 Vivacom expanded its portfolio of RPA (robot process automation) solutions, introducing software robots that automate routine tasks and workflows in both the private and public sectors. These solutions enable organizations to streamline administrative processes, minimize human error, reduce operational costs, and enhance transparency and

efficiency. The RPA solutions implemented during the year were applied to projects such as automated calling, financial operations, customer service, supplier management, and process digitalization, supporting clients in achieving higher productivity and better service quality.



Investing in innovations and partnerships

In 2024, Vivacom also took part in Eastern Lights, a large-scale European project financed under Horizon Europe. The initiative focuses on developing infrastructure for CO₂ capture, transport, and storage in Eastern Europe. Vivacom contributes with its expertise in connectivity and monitoring solutions, supporting Europe’s decarbonization and climate goals.

 **Looking ahead**

Further development of smart and innovative solutions, with focus on:

- ✓ Integrating AI technologies into municipal and business services.
- ✓ Expanding smart city platforms for mobility, energy efficiency and environment.



Co-funded by
the European Union



European digital projects in 2024 with Vivacom as key partner

Eastern Lights (Horizon Europe)

Partners:

- The leading partner is Holcim Bulgaria. The initiative brings together 19 organizations from 8 countries, with the goal of supporting industrial decarbonization and contributing to the achievement of the EU’s climate objectives.

Project summary:

Eastern Lights is a pan-European initiative funded by Horizon Europe, bringing together 19 partners from 8 countries to develop safe and scalable CO₂ transport and storage solutions that support industrial decarbonization. Based in Northwest Bulgaria, the project aims to de-risk Carbon Capture, Utilization, and Storage (CCUS) by demonstrating robust industrial-scale capabilities.

The project will construct and test a short CO₂ transport pipeline fully integrated with a commercially operated storage site in saline aquifers, addressing key technical, operational, and safety challenges. Extensive geological and geophysical studies will ensure safe, long-term CO₂ injection while mitigating potential risks such as induced seismicity.

Eastern Lights will also validate critical process parameters and technical aspects for full-scale CCUS deployment, while tackling practical considerations such as land agreements and permitting requirements. The initiative emphasizes stakeholder engagement, cross-border collaboration, and cluster development, including the utilization of CO₂ from a Turkish industrial enterprise.

Vivacom’s contribution:

- Participation as a technology partner, providing secure communication infrastructure for CO₂ storage monitoring.
- Deployment of connectivity solutions for industrial sensors and monitoring of CO₂ transport systems.
- Support of communication infrastructure for data analysis platforms and ensuring the safety of CO₂ storage operations.

Community investment



Highlights from 2024

- ✓ Complete redesign of the Vivacom Regional Grant, with doubled funding and simplified processes.
- ✓ Record 395 applications for the Vivacom Regional Grant, 246 first-time applicants, nearly 1,200 participants, 213 educational and environmental initiatives across 22 locations.
- ✓ Technology partner of the first International AI Olympiad in Burgas, providing connectivity, financial support, and awards for top-performing students.

// We believe that community investments make the greatest impact when they combine long-term effect, innovation, and active engagement of local communities. Our role goes beyond providing funding - we strive to create real added value through knowledge, technology, and partnerships.

Elitsa Georgieva | Corporate Communications Director



Driving social impact

Vivacom takes a comprehensive and strategic approach to supporting social initiatives, investing resources, expertise, and technology in causes that have long-term societal significance. Our efforts are guided by a long-term vision to generate sustainable impact in education and environmental protection.

We focus on projects that offer meaningful contributions to communities by combining societal relevance with innovation and sustainability. Initiatives are selected based on their potential to address specific educational or environmental challenges, their use of new technologies including artificial intelligence, and their capacity for long-term development. We also prioritize projects where Vivacom can provide tangible support not only through financial contributions but also through technology, connectivity, and expertise. Collaboration with established NGOs and educational institutions ensures that supported projects are effectively implemented and achieve measurable impact.

Key initiatives include:

Grant funding for the civil sector through the Vivacom Regional Grant program – the company’s largest and longest-running social initiative, supporting organizations from Bulgaria’s biggest cities to its smallest villages. In 2024, the program was strengthened to provide greater impact and reach for local communities..

Financial and logistical support for educational and scientific projects, such as the long-term partnership with the Association of Olympiad Teams in Natural Sciences, providing donations, technological resources, promotion, and dedicated preparation spaces.

Support for innovative educational formats, including the first International Artificial Intelligence Olympiad, where Vivacom provided high-speed connectivity via its 5G network, financial awards, and participation as a technology partner.

Donations of services and resources to organizations working with vulnerable groups, including SOS Children’s Villages and Animus Foundation, ensuring access to communication services and technological solutions.

Partnerships with established educational organizations, such as Junior Achievement Bulgaria, to support programs that develop youth entrepreneurship and leadership skills.

Technological and infrastructure support, where Vivacom provides not only funding but also critical resources, including connectivity, devices, spaces, and digital solutions, facilitating the effective implementation of socially impactful projects.



Key initiatives and projects in 2024

Vivacom Regional Grant

In 2024, we fully revamped our flagship social initiative, the Vivacom Regional Grant, to make it even more effective for the civil sector.

Key changes included:

- Doubling the maximum grant for a single organization from BGN 5,000 to BGN 10,000.
- Increasing the total fund from BGN 60,000 to BGN 100,000.
- Simplifying the application process: organizations now submit a one-page concept instead of a full project proposal.
- Introducing an accelerator program, including three workshops with experts from the Bulgarian Center for Non-Profit Law, during which finalists transform their ideas into actionable projects and enhance their communication skills.

Achievements from 2024:

- 395 submissions, with 246 organizations applying for the first time.
- Nearly 1,200 participants across the country, including over 700 children and youth
- 213 educational and environmental initiatives
- 22 locations.

Projects raised awareness in local communities about critical environmental issues, including the importance of protecting endangered plant and animal species and preserving wildlife.

Participating organizations experimented with innovative approaches to address long-term educational challenges, such as supporting children with hearing impairments, teaching English to visually impaired learners, and introducing creative writing in schools.



Key initiatives and projects in 2024

First International AI Olympiad

In 2024, Vivacom became a partner of the world’s first International AI Olympiad, held in Burgas in August. Around 200 children and youth from nearly 40 countries collaborated over six days on innovative AI projects and solutions. Vivacom provided unlimited high-speed internet access to ensure the event ran smoothly and reliably. Participants used Bulgaria’s largest 5G network to develop, test, and refine AI technologies. Additionally, Vivacom contributed BGN 10,000 in financial support and awarded top-performing students with the latest wireless headphones, Nothing Ear 1.



Science Olympiad Teams

In 2024, we continued supporting the Association of Science Olympiad Teams with a new donation of BGN 30,000. The funds supported the preparation and participation of eight national teams in international competitions and Olympiads. During the year, Bulgarian Olympians won a total of 91 medals at prestigious contests worldwide. Beyond financial support, Vivacom actively promotes their achievements and mission.



Internship Initiative - Preserving Serdica’s Heritage

As part of Vivacom’s Summer Internship Program, 70 interns and mentors took part in a volunteer action to help preserve the ancient Roman ruins of Serdica in Sofia. The group dedicated over 280 volunteer hours to cleaning the protective wall of the site, in collaboration with archaeologists from the Regional History Museum as well as architects and engineers from the local administration (Sofia’s Oborishte district). This was one of Vivacom’s annual volunteer initiatives, which give young people the opportunity to engage in environmental and community projects. The activity not only supported the safeguarding of cultural heritage but also gave participants the chance to contribute to their community while learning more about Bulgaria’s history.



Additional support in 2024

Vivacom supported nearly 20 organizations, including:

- 10 NGOs finalists in the Vivacom Regional Grant
- Association of Olympic Science Teams in Bulgaria
- First International AI Olympiad
- Junior Achievement Bulgaria – Manager for one day initiative
- Bulgarian Christmas
- Animus Association Foundation
- SOS Children’s Villages
- Time Heroes Foundation

Vision for our initiatives

Vivacom continues to build on its established social impact programs, aiming to strengthen their effectiveness and expand their reach. Our short-term goals focus on enhancing existing initiatives, deepening strategic partnerships, and launching new programs that address pressing social and environmental challenges:

- Further development of the Vivacom Regional Grant through a partnership with New Bulgarian University. Students from the Advertising and Public Relations programs will participate by creating communication strategies for all NGOs - finalists in the program. This approach will help NGOs amplify the reach of their projects while providing students with hands-on experience in socially impactful initiatives.
- Ongoing partnership with the Association of Olympic Science Teams in Bulgaria, with an expanded scope of support:
 - o Establishment of a 3-year partnership agreement,
 - o Total donation of BGN 120,000 to support team preparation and participation in international competitions and international olympiads,
 - o Provision of essential technological resources, including high-speed connectivity and devices, to facilitate smooth preparation,
 - o Access to Vivacom spaces for training and educational sessions for national teams.
- Launch of Job Lab, a training program for 11th and 12th graders, delivered in partnership with established organizations, aimed at equipping young people with the soft & digital skills needed for the future workplace.



Looking ahead

- ✓ Continuously enhancing existing programs to increase their impact for the respective beneficiaries.
- ✓ Expanding existing partnerships through the provision of technological products and services.
- ✓ Further strengthen Vivacom’s position as a recognized leader in corporate social responsibility in Bulgaria.

Human Capital

Highlights from 2024

- ✓ Vivacom won the award for 'Employee Engagement' at the Forbes HR Awards, confirming its overall approach and commitment to team satisfaction.
 - ✓ In 2024, the company attracted over 900 new talents, demonstrating a successful recruitment strategy.
 - ✓ Vivacom trained 235 new mentors who support new employees in their development.
- ✓ The Summer Internship Program attracted over 1,400 students, of which 24 started on permanent roles after the internship.
 - ✓ An average of 44 training hours per employee in 2024.

// We believe that exceptional results are achieved when each team member is supported with a personalized development plan. Recognizing individual growth needs empowers our people to gain new skills, drive innovation, and take ownership of their professional journey.

Malina Chavdarova | Human Resources Director



Career start

In 2024, Vivacom was recognized at the Forbes HR&Employer Branding Awards as a finalist in the Talent Attraction category, highlighting our people-focused approach, innovative HR practices, and commitment to career development.

Last year, we welcomed over 900 new employees and recorded a significant increase in applications compared to 2023. We attract talent by highlighting the stability of our workforce (12 years average tenure), opportunities for development, flexible working hours, extensive learning opportunities, nationwide career prospects, and transparent recruitment.

Our recruitment strategy combines diverse channels – corporate website, job boards, university partnerships, social media, referral programs, and an internal job portal – to reach professionals in all fields needed.

New hires are welcomed on day one with a welcome email, access to online training, and participation in our Orientation Day (on-site or

online). They are paired with mentors and receive tailored onboarding programs. For customer-facing roles, standardized pre-work training ensures readiness before engaging with clients. We continuously improve the onboarding process through feedback surveys at the 7-day and 3-month marks, as well as individual follow-up meetings. Internal mobility is encouraged through a transparent job posting policy, ensuring 100% visibility of all open positions across the company.

In 2024 we continued to focus on our youth programs for talent attraction: Vivacom Summer Internship Program, Vivacom Technical Academy, Vivacom Practice Program, participation in various career forums and events, as well as partnerships with educational institutions. These initiatives enable young people to develop skills, gain practical experience, and contribute to innovation in the telecom sector, reinforcing Vivacom’s role in driving technological progress in the digital age.



Summer Internship Program
in 2024

1,400 applicants.
58 candidates selected.
24 transitioned into permanent
roles at Vivacom.

Technical Academy
in 2024

16 new participants.
40% transition into permanent
roles at Vivacom.

Practice Program
in 2024

3 new cities.
150 students.
15 high schools.

Vivacom's programs and initiatives for launching careers

Vivacom Summer Internship program



For the 21st consecutive year, Vivacom's Summer Internship Program attracted strong interest, with over 1,400 students applying in 2024 - 400 more than in 2023. Following a rigorous selection process, 58 talented candidates began their first job under a labor contract. Since its inception, more than 1,650 young professionals have successfully completed the program.

Over the course of three months, interns participated in intensive training, contributed to real business projects, and engaged in initiatives that reflect Vivacom's culture and values. A 360-degree departmental rotation gave them a comprehensive view of the organization, supported by dedicated mentors. Notably, 20% of Vivacom employees who started as interns have returned to the program as mentors themselves, fostering the next generation of talent.

The program has proven to be a launchpad for lasting careers - over 80 former interns now hold leadership or expert positions within the company, and in 2024 alone, 24 participants transitioned into permanent roles at Vivacom.

Vivacom Technical Academy



The Vivacom Technical Academy, the only program of its kind in Bulgaria, gives students the opportunity to deepen their technical knowledge under the guidance of experienced industry experts. Organized in partnership with the Technical University of Sofia, the Academy launched its 15th edition in 2024 with 16 new participants. Since its start, 326 students have taken part, with over 70 Vivacom lecturers sharing their expertise.

Spanning two academic semesters, the program combines solid theoretical preparation with hands-on practical experience. Students gain not only technical and strategic knowledge, but also managerial, communication, and presentation skills, preparing them for the real business environment of telecommunications. In the 2024-2025 academic year, the Academy will introduce a competitive hackathon format as an innovative learning method.

The program delivers tangible career opportunities - over 40% of participants have continued their professional journey at Vivacom in permanent roles.

Vivacom Practice program



Vivacom Practice Program is fully aligned with the needs of the new generations of youth who have an affinity for technology, making it unique. It offers young people the opportunity to develop work habits, gain professional skills, and acquire foundational knowledge in the world of telecommunications. The program also serves as a steppingstone for a future career at Vivacom.

In 2024, more than 150 students from 15 vocational high schools across the country took part in the fifth edition of the program. The focus was on 11th-grade students - those nearing graduation, with more specialized knowledge and a clearer vision for their professional path. Participants experienced the daily operations and work environment of Vivacom's key technical departments, including Network Operations, Dispatch, Fixed Access, Quality Assurance, IT, Site Maintenance, and the Network Operations Center. For the first time, training in the Call Center was included, offering an additional opportunity to strengthen communication skills. Over 64 academic hours, more than 80 Vivacom mentors and experts introduced students to real-life work processes and guided them through practical projects. In 2024, five new schools from three additional cities - Pernik, Pleven, and Shumen joined the existing network in Sofia, Plovdiv, Varna, Sliven, Burgas, and Stara Zagora.

So far, over 330 students have participated in the five editions of the Practice Program.

Manager for a Day



In 2024 Vivacom once again took part in "Manager for a Day" - one of the most significant and large-scale educational initiatives for career orientation in Bulgaria. The company welcomed young participants into five key departments: the Education Center, Information Technology, Customer Experience, Corporate Sales, and Network Operations Management. Five students had the opportunity to immerse themselves in a real working environment, gain insight into the roles of senior leaders, and practice their communication skills in a managerial context. They engaged in discussions with team members, learned about ongoing projects, took part in meetings, asked questions, and heard firsthand about both challenges and successes.

Talent development

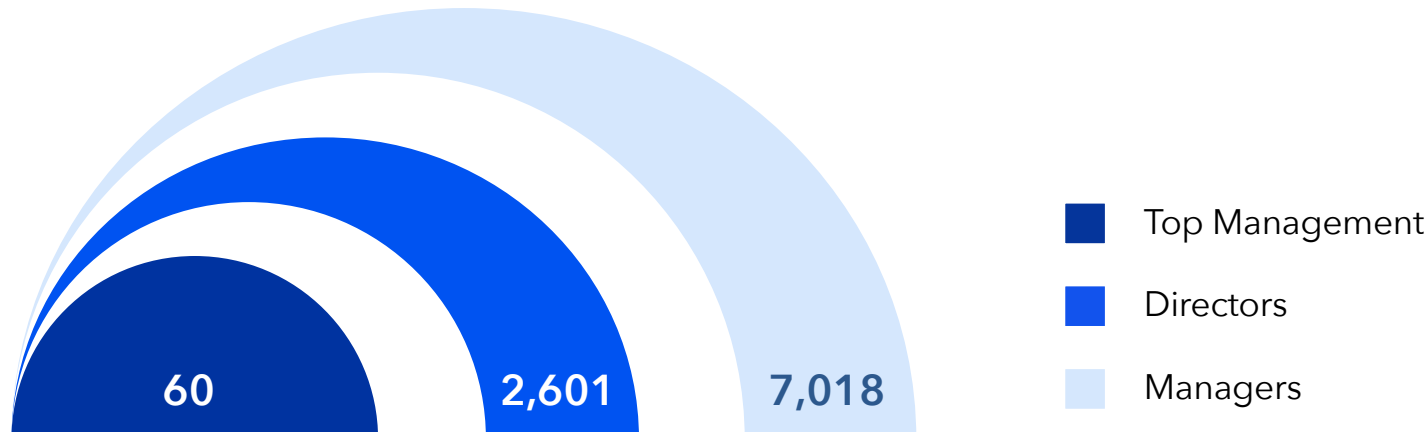
We continuously invest in the development of our people by offering a wide variety of training programs that enhance professional expertise, leadership skills, and personal effectiveness.

Our portfolio includes a wide variety of training programs tailored to different needs. We offer functional trainings focused on job-specific skills and internal courses related to our products, services, and systems. Statutory trainings address mandatory legal requirements such as health and safety and data protection. Management trainings cover essential and advanced programs designed to enhance team leadership and business performance, including the Key Management Skills course for both new and experienced managers. We also provide professional certification programs like ITIL, PMP, and SAFe through certified partners. For personal development, employees have access to elective e-learning courses and self-management programs via our LMS platform, encouraging continuous learning and growth.



We also provide support to the most of the management roles across the organization through various training initiatives. For senior leadership, we offer coaching and tailored programs to address their specific development needs. All new managers receive support through an interactive guide, "First-Time Manager," and participate in the in-person "Key Management Skills" training, delivered in two two-day modules. Experienced managers can also attend this training to refresh their skills. This program is designed to ease the transition into management roles and establish a standard for successful leadership behavior, based on a specially developed UG competency model and Vivacom's best practices. In 2024, 201 employees completed the "Key Management Skills" training.

Average training hours by leadership category, 2024



During the year, we trained 235 new mentors who support new employees in the company. We also continued our long-standing tradition with the Vivacom Summer School, held every summer from June to September. The program covers the development of soft and technical skills, as well as knowledge about Vivacom's products, services, and technologies. In 2024, 167 participants took part in the Vivacom Summer School.

We regularly collect feedback after trainings to better understand employee needs and improve our programs. Key evaluation criteria include the relevance of content, applicability of skills learned, adequacy of examples, and alignment with participant expectations.

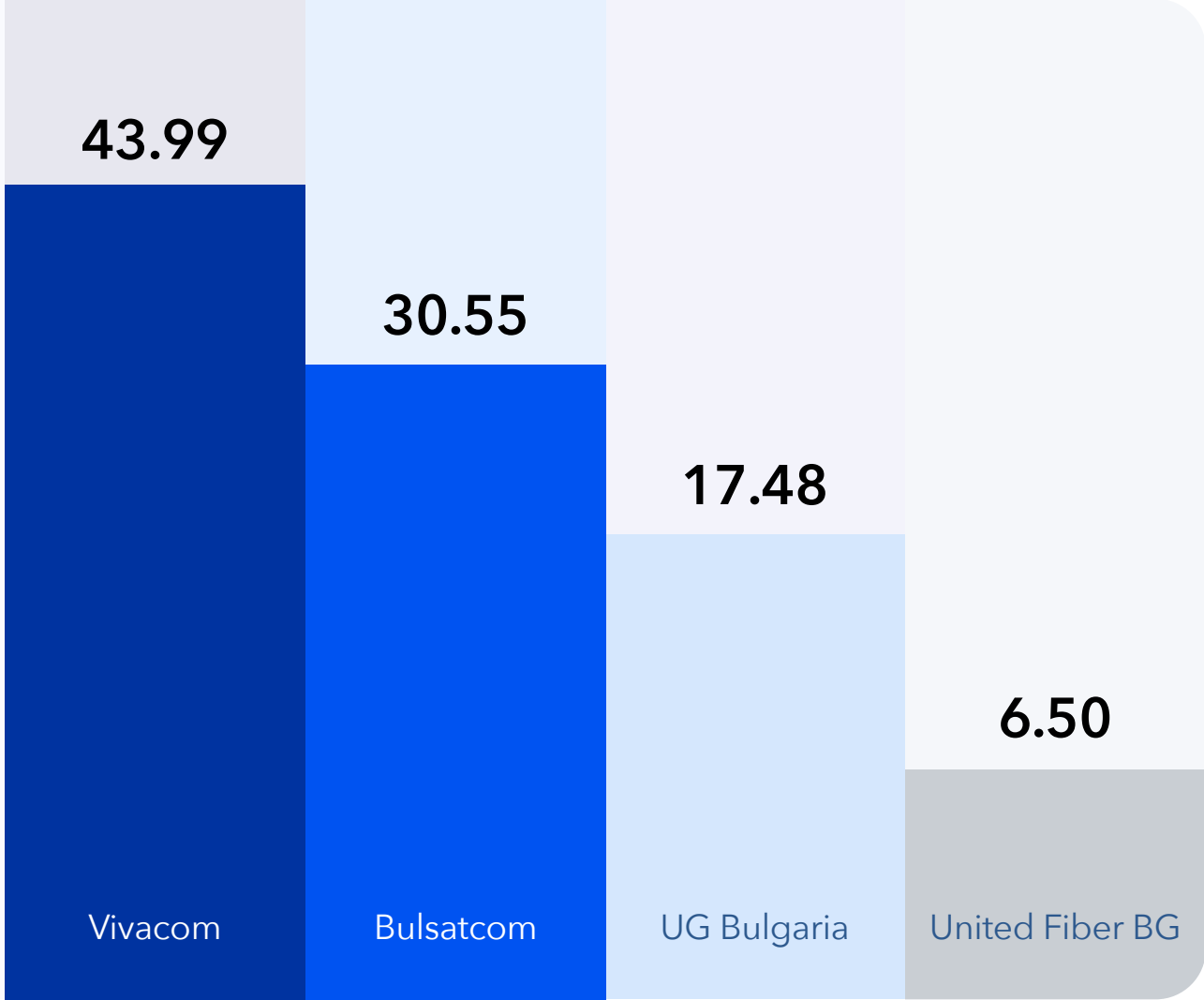
44 training hours
per employee on average

2,516 participants in
professional certifications

2,239 enrollments
in elective e-learning courses

43,226 enrollments in LMS
e-learning courses, a 13%
increase compared to 2023

Average training hours per employee in 2024



Motivation and engagement

Vivacom continuously invests in the development, retention, and motivation of its employees through a variety of tailored programs that support long-term growth and success. We are proud that the average length of employment at Vivacom is 12 years, which reflects the stability and commitment we foster within our workforce.

To support our employees' well-being and professional development, we offer a comprehensive benefits package covering life insurance, healthcare, disability coverage, food vouchers, sport cards, psychological care, additional paid leaves days, a day off for Birthday and other valuable corporate services. These benefits are complemented by diverse training opportunities and programs designed to meet the specific needs of different roles, all delivered with a clear focus on individualized support



In 2024, Vivacom was honored with the 'Employee Engagement' award at the Forbes HR & Employer Branding Awards. This recognition highlights our dedication to creating a positive employee experience through initiatives like the 3E program (Enhancing Employee Experience), launched in 2023. The program includes enhanced onboarding practices, regular CEO meetings with employees and extended sessions with senior management, as well as new benefits and interactive trainings aimed at both professional and personal growth. Additionally, the 3E program incorporates initiatives on diversity and ESG, expert recognition programs for retention and development, six mentoring programs, and an internal training program for new managers - which earned a silver award at the 2024 Career Show Awards for Best Employer in Bulgaria. In 2024, we have 6 expert programs (Corporate Sales Experts, Customer Service Experts, The Sales Experts, Push Channels Experts, Technical Experts, VIVACOM Experts) with 660 participants.

We regularly collect feedback on employee engagement and the effectiveness of our development initiatives through our annual eNPS (employee Net Promoter Score) survey.

Performance and continuous improvement

All Vivacom employees receive regular performance and career development reviews. In 2024, we updated the competency model, introducing six universal competencies applicable to all employees, along with an additional leadership competency tailored to managerial roles. These competencies were identified as essential for success across various functions, and efforts were made to embed them more effectively into performance assessments while aligning them closely with our learning and development initiatives. As a result of these focused efforts on development and performance management, 10% of employees were promoted in 2024, reflecting Vivacom’s commitment to recognizing and advancing internal talent.

To ensure consistency and clarity in applying the updated model, all participants in the performance review process received targeted training on competency definitions and the evaluation scale. This enhanced approach aims to foster a culture of continuous

improvement and make key competencies more visible and valued, both locally and at Group level.

The Personal Development Plan is a key element of performance management. Managers are encouraged to discuss development needs with each of their employees at least once a year. To support this process, we delivered specialized performance appraisal training for new managers, offered individual consultations, and provided electronic resources, including guides and an e-learning course on setting SMART goals.

Recognizing the importance of professional growth, Vivacom has also developed the Career Paths guide, offering employees clear insights into opportunities for advancement that match their interests and aspirations. Each employee is responsible for driving their own career development, supported by their managers and HR specialists.



Looking ahead

- ✓ Organize cross-functional team meetings on the topic of ESG: Teamwork for a Sustainable Future for all employees in the company.
- ✓ Continuation and enhancement of retention and development programs.
- ✓ Upgrading the employee benefits package based on their feedback.
- ✓ Improving communication between employees and top management



Health and safety

Highlights from 2024

- ✓ 84.13% of employees underwent preventive examinations – above the industry average.
- ✓ More than 2,000 participants trained in key safety areas like electrical work, working at heights, and first aid.
- ✓ Every reported incident is investigated and used to improve safety practices across the company.

Workplace health and safety is not just a list of duties. It is a daily concern – to recognize the risk, to react in time, to know that you are not alone. At Vivacom, we believe that safety starts with awareness and is built with action – by everyone, for everyone.

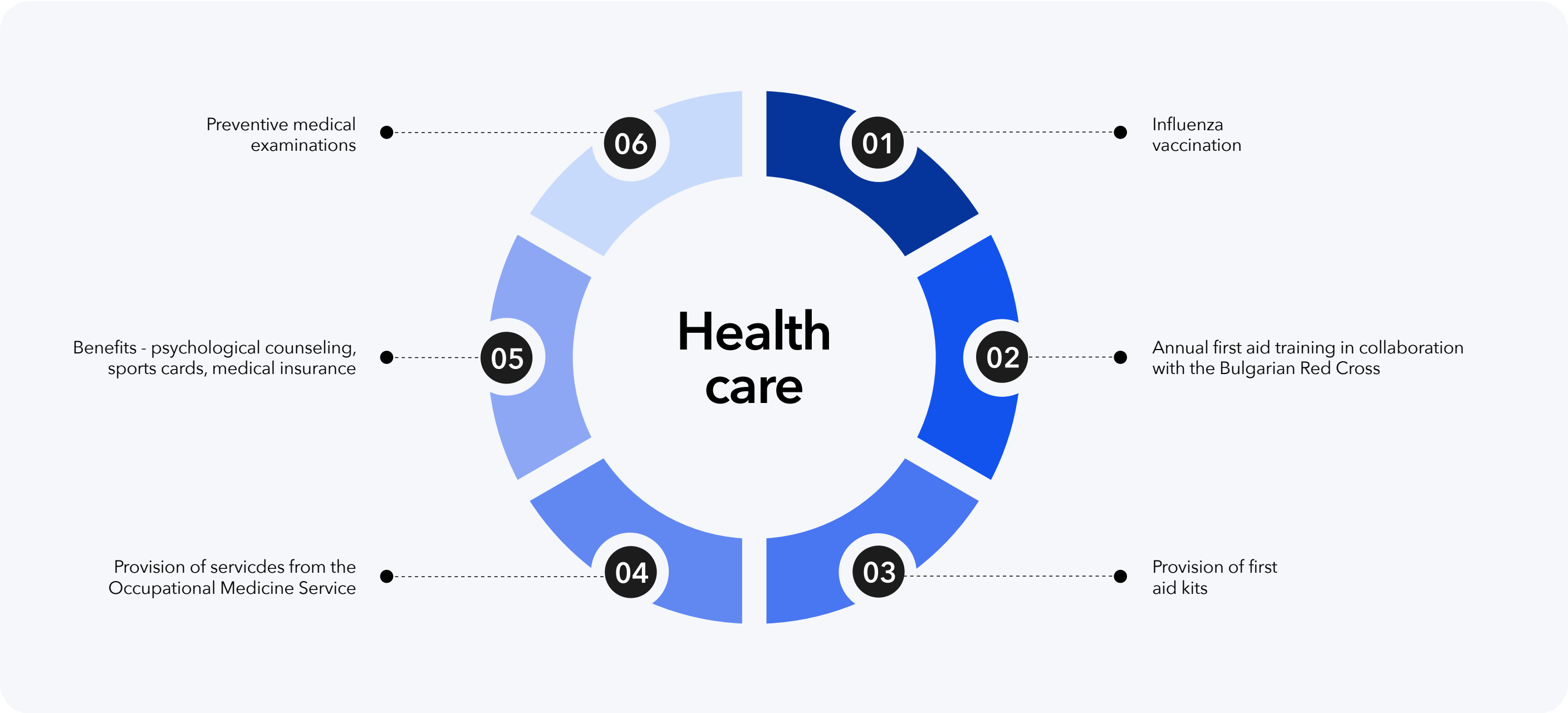
Ana Vazheva | Manager



Health and safety management

Since 2013, we have implemented a health and safety management system that is certified according to ISO 45001 (formerly OHSAS). Since then, we successfully confirm our certification every year.

Our occupational health and safety management system is built on risk assessment and a corresponding prevention program. These assessments follow a systematic approach, including classification of work activities, identification of hazards, exposure evaluation, and documentation of risk elements.



A formalized system for incident reporting and analysis is firmly established. Employees are required to report work-related risks and hazardous situations, as outlined in the Collective Labour Agreement. They must promptly inform their direct supervisor and the Health and Safety at Work (HSW) department. We provide multiple channels for reporting, and all safety reports are addressed quickly and efficiently. Investigation committees include managers, the HSW department, the employer, and other relevant parties depending on the situation.

Likewise, employees have the legal right to remove themselves from work situations they believe could cause injury or illness, following the same reporting procedures.

The measures we take to ensure safe working conditions at Vivacom are in accordance with current legislation and established best practices in the field of health and safety at work.

Responsibility at every level

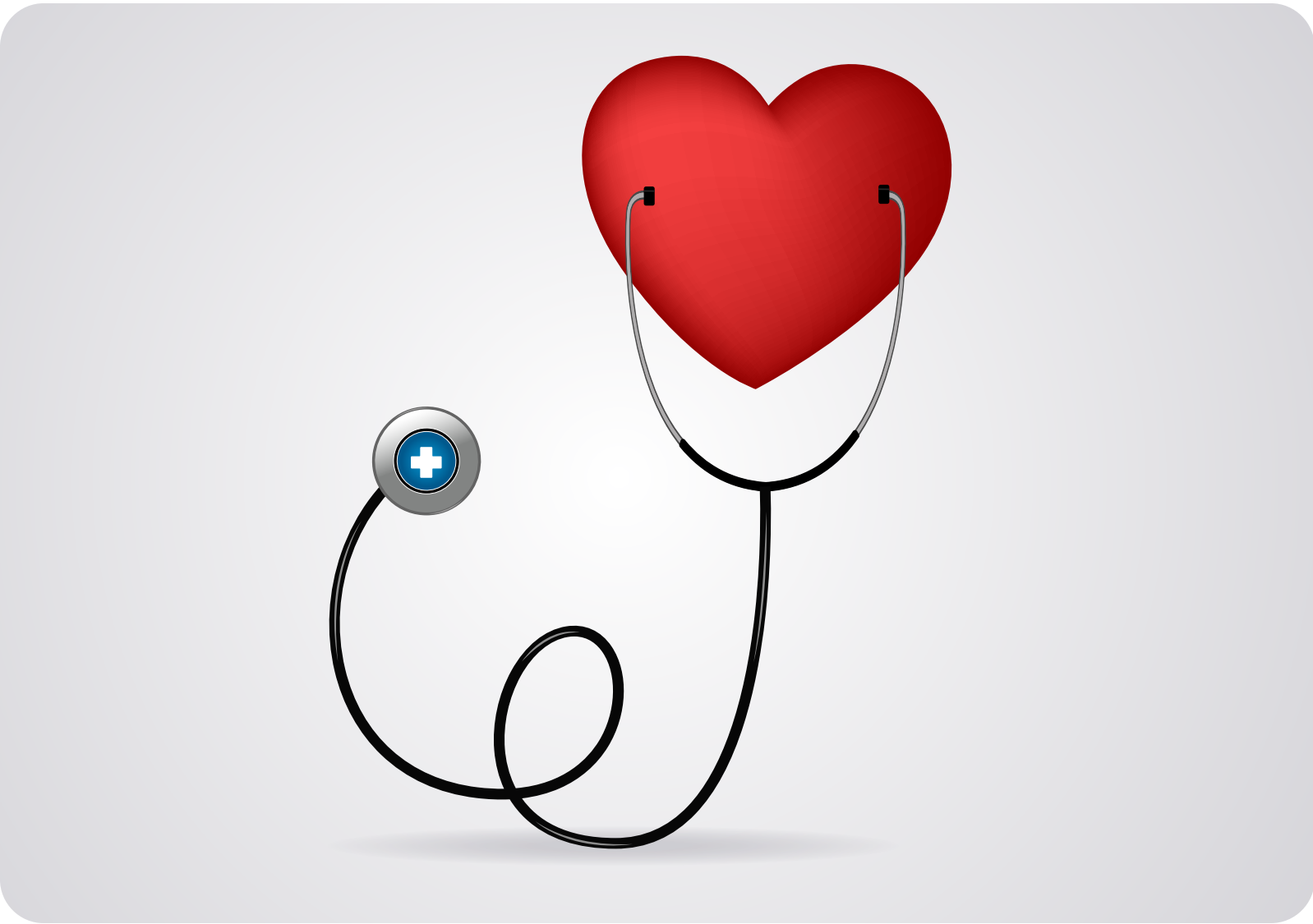
At Vivacom, a clear and structured approach has been established to ensure the effective implementation and maintenance of the Occupational Health and Safety (OHS) Policy. Each organizational level has defined responsibilities, with designated individuals accountable for their execution.

Senior leadership plays a key role in endorsing the policy and ensuring it is well understood both internally and externally. At the functional level, directors oversee the consistent application of the policy across their respective departments. Operational management is responsible for the day-to-day execution, which includes identifying hazards, assessing risks, and planning the necessary resources – ranging from qualified personnel to training and expert consultation.

At the same time, every employee is personally responsible for contributing to a safe working environment by adhering to established procedures and looking after their own safety, as well as that of their colleagues and customers.

Promoting health, safety and active living

In 2024, Vivacom continued to actively invest in the health and safety of its employees. We conducted preventive medical examinations for 2,565 employees, with an 84.13% participation rate – significantly above the average for similar campaigns, according to our health insurance provider. Our medical check-up package goes beyond legal requirements, including additional screenings aimed at early diagnosis of socially significant conditions (such as diabetes, oncological diseases, and others). Vivacom also provides supplementary health insurance for all employees and extends this coverage to their immediate family members. To further support employee health, we offered influenza vaccinations to all employees and their family members.



Vivacom maintains a well-prepared workforce in first aid, with trained personnel present in every building where employees work. For locations without designated first aid responders, we have established a First Aid Instruction manual, approved by the Bulgarian Red Cross, to guide employees in providing initial assistance. Moreover, all company sites are equipped with fully stocked first aid kits to ensure timely support in case of emergencies.

To ensure continuous safety awareness, over 350 employees receive annual training to act as safety instructors, supporting the ongoing delivery of safety briefings and instruction activities throughout the company. We also provide appropriate workwear and personal protective equipment to nearly 1,400 users. Any changes to the protective gear are carefully discussed and agreed upon with the end-users to maximize both safety and satisfaction.

We also conduct practical training, including evacuation drills and fire and emergency simulations, at various company sites. All trainings are tailored to the

specific risks of the work environment and are supported by clear instructions and accessible materials to ensure that every employee knows how to respond when necessary.

All safety briefings at Vivacom are conducted in full compliance with the applicable national legislation. Every employee undergoes both initial and regular safety instructions tailored to their role and work environment. Depending on the level of risk associated with their duties, periodic briefings are held either annually or quarterly. In addition, special briefings are organized in response to extraordinary or emergency situations, ensuring that all staff remain informed and prepared at all times.

In 2024 we also organized numerous training courses to ensure healthy and safe working conditions.

Type of training	Participants
Electrical Safety	1,212
Training on Safety in the Construction and Maintenance of Aerial Optical Cable Networks	279
Safe Work at Heights	84
First Aid	57
Safe Off-Road Driving	20
Training on Occupational Health and Safety for all instructors, labor process managers, and representatives of the Occupational Health and Safety Committee	368

Promoting health activities among our employees

At Vivacom, we believe that a healthy and active lifestyle is an essential part of employee wellbeing and productivity. Beyond occupational health and safety measures, we promote a strong sports culture through company-wide initiatives, volunteer campaigns, and dedicated teams. These activities are part of Vivacom’s broader Health & Active Lifestyle program, which empowers employees to combine personal wellbeing with teamwork, social causes, and community engagement.

No Elevator Day

A campaign at our headquarters encouraging employees to take the stairs instead of elevators, with every floor branded with motivational and humorous messages about healthy habits, workplace wellbeing, and positive communication.



Day of the Sneaker

A company-wide sports challenge promoting running, cycling, and football. For every workout recorded, Vivacom donated BGN 1 to the Cedar Foundation to support hydrotherapy for children and young people with disabilities.

Vivacom Sports Teams

Our colleagues actively participate in national races and tournaments, including Vitosha 100, Sofia Marathon, Pancharevo Trail Run and others. We proudly support two football teams, a running group, and a cycling team, who not only strengthen team spirit but also achieve remarkable results in competitions.



Looking ahead

- ✓ Affirmation of a preventive approach and practices for health and safety by initiating, developing, implementing, and communicating corporate health and safety rules and procedures.
- ✓ Identifying health and safety risks, hazardous behaviors, and unsafe practices.
- ✓ Consulting and training functional managers on compliance with regulations and best practices in occupational health and safety.
- ✓ Monitoring and analyzing health and safety activities, including overseeing the implementation of procedures, rules, and practices.
- ✓ Maintaining low levels of workplace injuries.
- ✓ Increasing participation in annual preventive medical check-ups.

Diversity, equality and inclusion

Highlights from 2024

- ✓ ADEI survey in 2024 engaged nearly 4,000 employees to assess current practices and gather suggestions for improvement.
- ✓ Nearly 40% of our managerial positions are held by women.
- ✓ Vivacom hired 952 new employees, primarily aged 20-30, with 438 of them being women, highlighting the focus on gender balance.

“ At Vivacom, we believe that embracing diversity isn't just a checkbox - it's about creating a workplace where every individual, regardless of gender, age, or background, feels valued and empowered. By fostering an inclusive environment, we not only enhance our effectiveness but also contribute to a more equitable society. Our commitment to gender balance and equal opportunities reflects our dedication to ensuring that everyone has a fair chance to thrive.

Malina Chavdarova | Human Resources Director



Commitments through policies and practices

Vivacom is committed to promoting diversity, equality and inclusion (DE&I) as key principles for creating a sustainable and innovative workplace. The company ensures that every voice is heard and valued by integrating DE&I into its processes and solutions, with the aim of improving the employee experience and serving its diverse customer base.

In 2023, we signed the Bulgarian Diversity Charter, reaffirming our commitment to social inclusion, equal opportunities, and a workplace culture that embraces diversity through inclusive practices.

To further advance our DEI culture, we conducted a company-wide DEI survey covering nearly 4,000 employees, gathering feedback on existing practices and ideas for improvement.

Our training initiatives in 2024 included the “First Steps in Diversity and Inclusion” program for 10 colleagues in key positions responsible for driving DEI practices, as well as the launch of an optional online course, Dialogue Between Generations – The Path of the Leader, aimed at helping managers effectively lead teams spanning multiple generations.



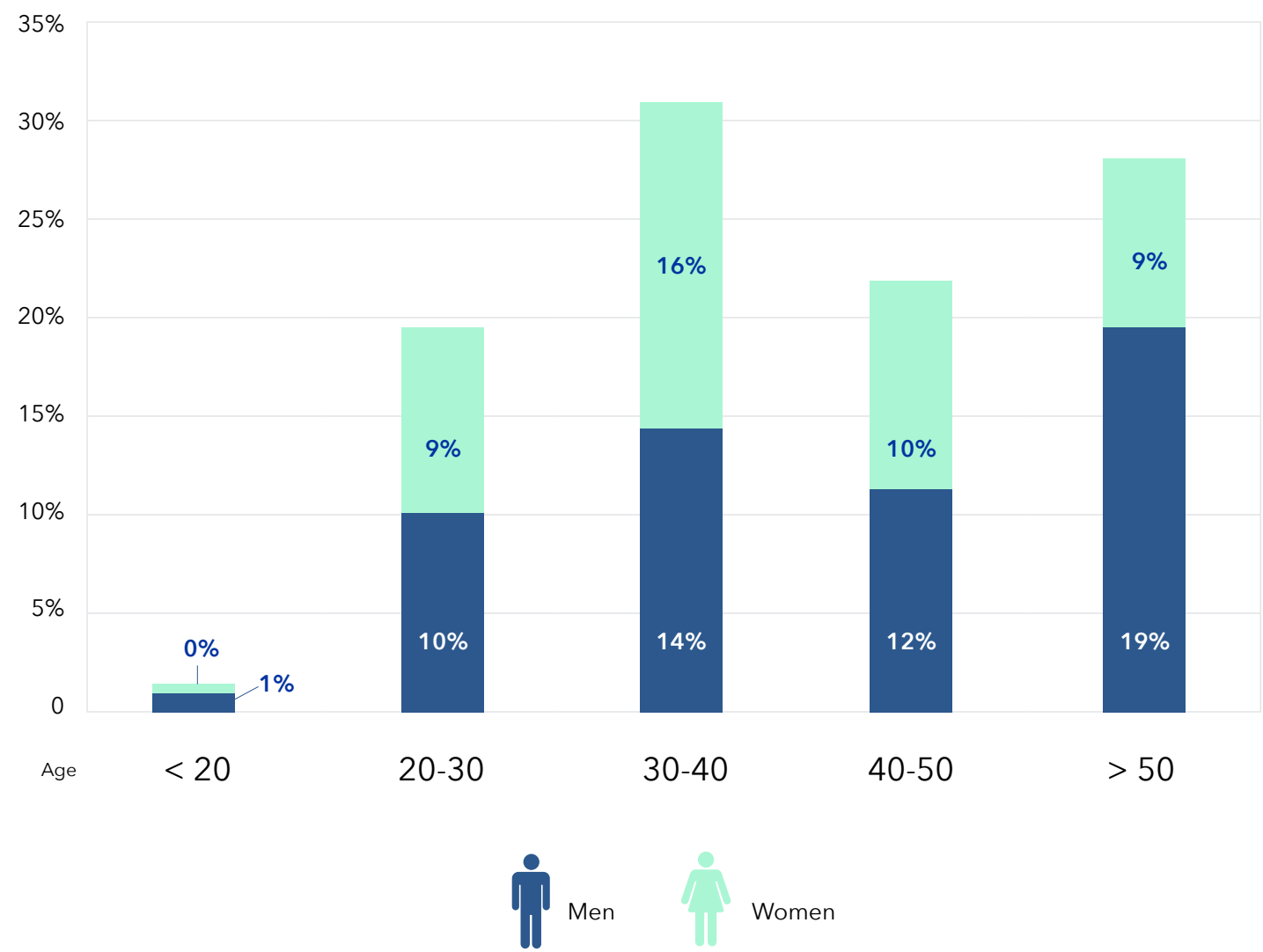
DEI in our workforce

Vivacom follows an inclusive approach that strengthens our workforce, supports future growth, and fosters an equitable, fair, and motivating work environment for all employees. Over the years, we have developed a range of effective practices, policies, and initiatives that have helped us build a strong and engaged team in a supportive and dynamic workplace.

Our commitment to diversity, equality and inclusion is reflected in multiple dimensions:

- **Gender balance:** In a technology-driven sector, nearly 40% of our managerial positions are held by women.
- **Disability inclusion:** People with disabilities make up over 3% of our workforce (122 employees). We ensure equal treatment and actively discuss with each of them how to make participation in company initiatives more accessible. For example, online training opportunities are provided, resulting in 95% of employees with disabilities completing at least one training course in 2024.
- **Generational diversity:** We maintain a healthy generational balance. Over 50% of our employees are aged between 30 and 50, providing stability and expertise. Nearly 20% are under 30, bringing fresh perspectives and energy, while almost one-third are over 50, playing a key role in knowledge transfer and sustainable development.
- **Fair remuneration:** Salaries are determined based on the position, qualifications, and performance, ensuring objectivity and equity.
- **Collective bargaining:** All employees are covered by a collective labour agreement, with over 400 members of trade unions.
- **Employee tenure:** Close to 40% of our people have been with Vivacom for over 15 years, and about half of them have been part of our company for more than 25 years - a testament to our culture of continuity and loyalty.

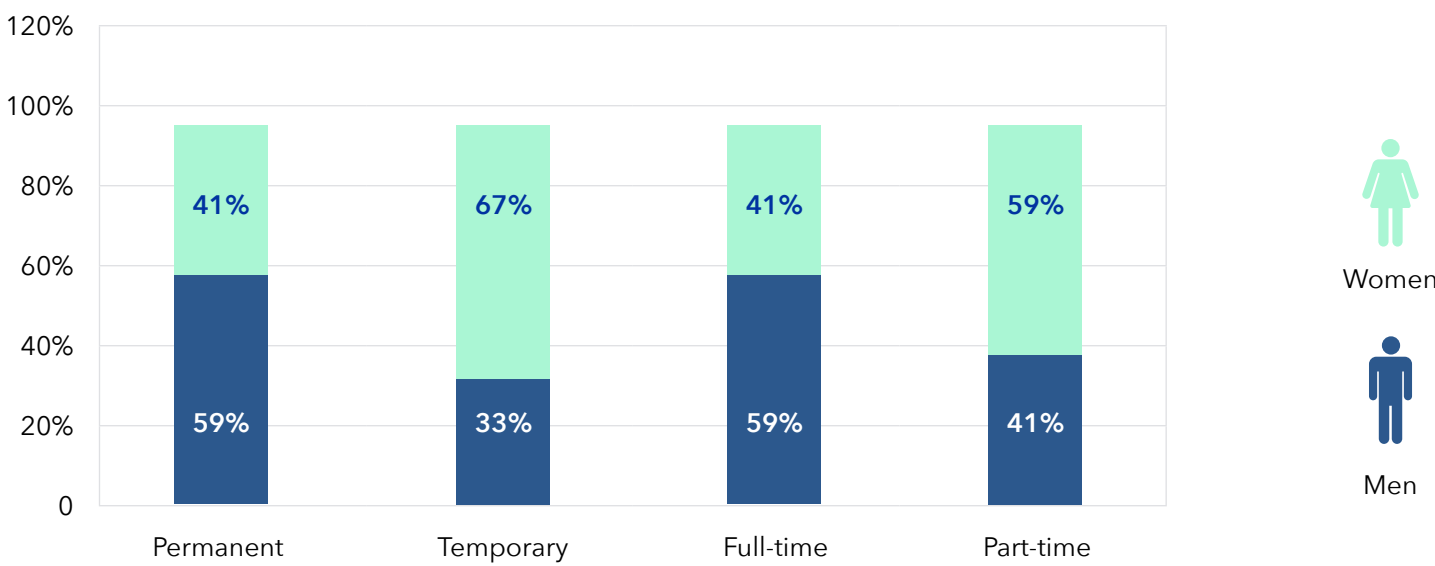
Total employees by age distribution and by gender, 2024



We continue our growth and in 2024 we employed 952 new people with a hiring rate of 18%. The majority of our new hires fall within the 20 to 30 age range, highlighting the significance of younger generations entering the workforce. Of these, 438 were women, reinforcing our focus on gender diversity in recruitment.

Today, our team numbers 5,199 people. We remain committed to equality and zero tolerance for discrimination, creating an innovative and inclusive environment that enables all employees to develop a wide range of skills and capabilities. We offer various forms of employment - permanent, temporary, full-time, and part-time - to meet the diverse needs and circumstances of our people.

Employment by gender and by type, 2024



Looking ahead

- ✓ Creation of an e-course to raise awareness about DEI (diversity, equity and inclusion), accessible to all employees in the company.
- ✓ Training program focused on the topic of “Unconscious bias” for all managers in Vivacom.
- ✓ Initiative with training content for working with clients with different abilities.

VIVACOM

Responsible governance

04



SUSTAINABILITY
REPORT 2024

Business ethics



Highlights from 2024

- ✓ No confirmed bribery and corruption cases
- ✓ Launched certification process for ISO 37001:2016 - the international standard for anti-bribery management systems
- ✓ Screened 1,265 third-party entities for sanctions and adverse risks
- ✓ Annual anti-corruption training with 91% completion rate.
- ✓ Two new policies introduced: Responsible Sourcing Policy and Conflict Minerals Policy.

At Vivacom, we believe that doing business with integrity is fundamental to long-term success. Business ethics guide our daily decisions and interactions - with employees, customers, suppliers, and the wider community. Our commitment to ethical conduct is embedded in our corporate culture, internal policies, and relationships with third parties. We strive to build a responsible and transparent business environment where compliance, trust, and accountability are key.

Mihaela Prakova | Risk & Fraud Management, Local Compliance Manager



Compliance

Vivacom is committed to maintaining the highest standards of compliance with applicable laws, internal regulations, and ethical practices. Our Compliance Program supports this goal through a robust framework that includes policies and procedures in areas such as anti-corruption, fraud prevention, conflict of interest, sanctions and trade, consumer rights, and third-party risk management.

Compliance at Vivacom is overseen by the Local Compliance Officer who reports to Vivacom’s CEO with a dotted line to United Group’s Executive Director of Compliance, Risk & Sustainability level. This direct reporting line ensures independence and objectivity in processes, reviews, and investigations. The Executive Director in turn reports to the CEO and the Board of Directors of United Group. This structure enables centralized oversight and standardization, while ensuring flexibility and responsiveness to local regulatory requirements and operational realities.

We ensure that both employees, suppliers and other stakeholders understand and follow these standards. New employees receive onboarding training, while ongoing education is delivered through periodic campaigns and refresher sessions.

Ethical relationships

[Vivacom’s Code of Business Conduct and Ethics](#) is the foundation of our ethical business practices. It sets clear expectations for employees and business partners, offering practical guidance through real-life examples and scenarios. The Code helps navigate complex situations, ensuring consistency with legal obligations and ethical norms.

The Code covers a broad range of topics, including:

- Respectful and inclusive workplace culture – promoting diversity, equal opportunities, respectful collaboration, and zero tolerance for harassment or discrimination
- Health, safety, environmental and social responsibility – ensuring employee well-being, minimizing environmental impact, supporting local communities, and upholding human rights
- Integrity in business practices – including anti-bribery and corruption measures, responsible handling of gifts and entertainment, avoidance of conflicts of interest, and compliance with fair competition, sanctions, and trade controls
- Information protection and digital responsibility – safeguarding company assets, protecting personal data and privacy, and ensuring secure and ethical use of technology
- Transparency and accountability – maintaining accurate financial records, preventing fraud, and complying with legal and regulatory requirements
- Ethical decision-making and speaking up – providing practical tools for navigating complex situations and channels for raising concerns confidentially and without fear of retaliation

Training on the Code of Conduct is mandatory for all new employees during onboarding and is part of a wider Compliance awareness program. In 2024, targeted training sessions were conducted for all staff to further strengthen understanding of business ethics policies and procedures.

Anti-corruption program

Vivacom continues to strengthen its anti-corruption framework to ensure integrity in all business interactions. Our Anti-Bribery & Corruption Policy is based on the principle of zero tolerance toward all forms of bribery and corruption, whether direct or indirect, monetary or non-monetary (e.g., gifts, entertainment, travel, donations and sponsorships).

In 2024, the company launched the certification process for ISO 37001 (the international standard for anti-bribery management systems), a testament to our unwavering commitment to conducting business with integrity and upholding the highest ethical standards.

A key element of our anti-corruption program includes a dedicated corruption risk assessment, which identified 24 potential risk areas across our operations. A new mandatory anti-corruption training was launched in November, achieving a 91% completion rate among employees. In addition, a compliance workshop for extended leadership team was held in December, focusing on real-world case studies related to bribery and corruption.

Conflict of interest management remained a priority, with 485 declarations submitted in 2024. An annual mandatory campaign targeting decision-makers also took place, resulting in 458 completed submissions. All high-risk activities related to gifts, entertainment, and travel (GET) continued to be processed through United Group’s GET Register platform, with a total of 132 requests submitted and reviewed during the year.

Reporting concerns

The [Integrity Helpline](#) remains a key channel for promoting ethical behavior and supporting a culture of transparency and accountability across our operations. It offers a confidential and safe environment for reporting concerns or grievances, accessible to both employees and external stakeholders, including our suppliers.

The helpline is designed to protect whistleblowers from retaliation and ensure every report is treated seriously and confidentially. All reports are handled in accordance with Vivacom’s Protected Disclosure & Anti-Retaliation Policy and Investigation Protocol. This means each report is thoroughly reviewed, with strict safeguards for personal data, confidentiality, and the rights of all involved. Retaliation against individuals who report concerns in good faith is strictly prohibited.

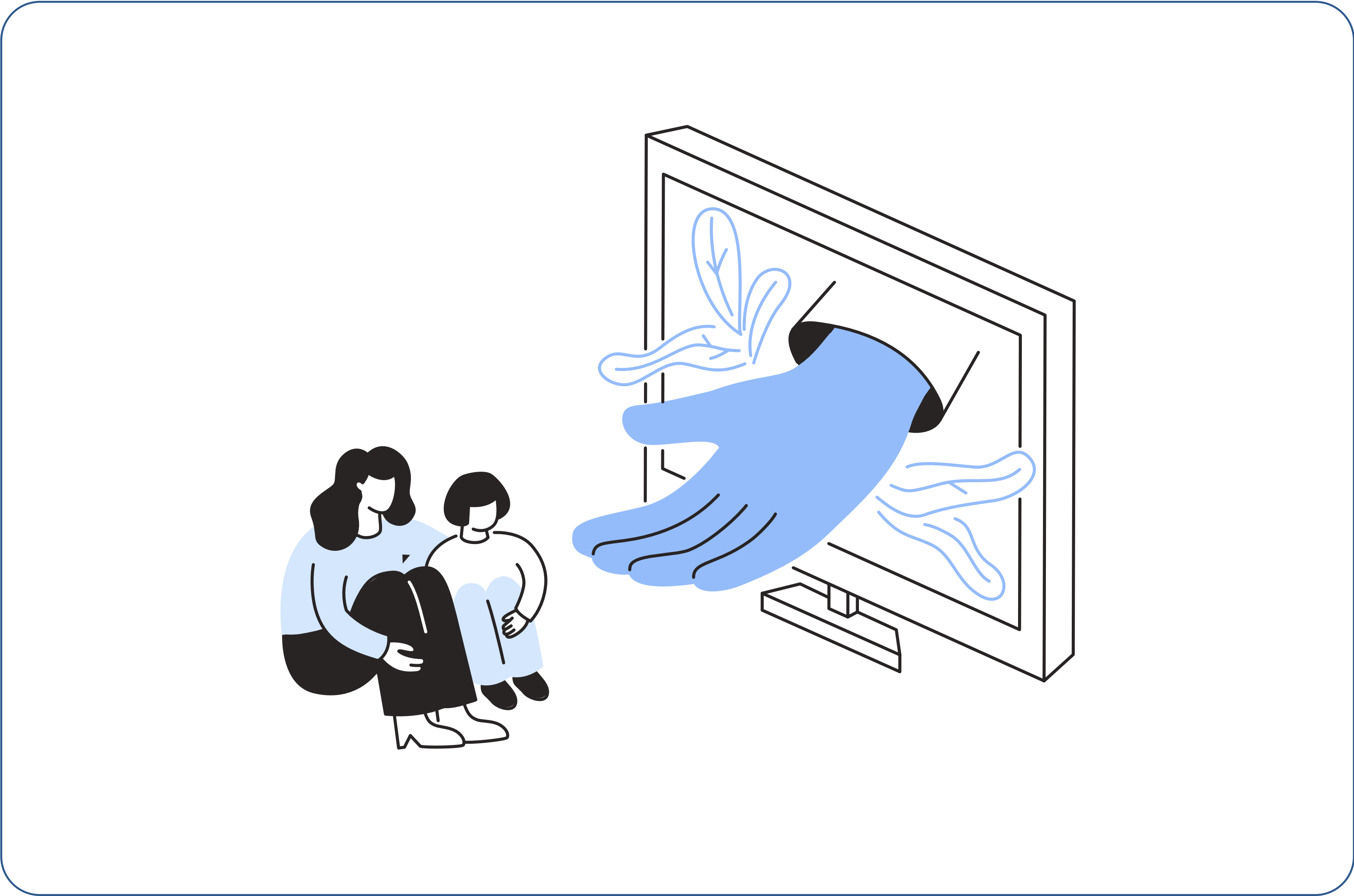
In 2024, a total of 13 complaints were received and processed through the Helpline. Each case was investigated by the Compliance team following the Investigation Action Protocol. No reports required escalation to regulatory authorities.

Reports can be submitted 24/7 through multiple secure channels, all available in several languages to ensure accessibility, comfort, and confidentiality for every user. Reports may also be submitted anonymously.

In addition, our compliance email (compliance@vivacom.bg) provides a direct way to request clarification or support regarding policies and ethical standards.

Available channels:

- | | |
|-----------------------|-------------------------|
| • Online platform | • Dedicated phone lines |
| • Mobile applications | • Compliance email |



Responsible supply chain

Vivacom applies the Supplier Code of Conduct, developed by United Group, as part of our contractual relationships with suppliers. The Code helps us ensure that suppliers operate in accordance with applicable laws, international standards, and our values. It is a key tool for maintaining trust and integrity across the value chain. It outlines expectations for ethical business behavior as well as environmental and social responsibility.

Supplier Code of Conduct: Key areas

Ethical conduct: including anti-corruption, fair competition, data protection, cybersecurity, accurate reporting, and responsible communication.

Social responsibility: ensuring fair wages, non-discrimination, no child or forced labor, and compliance with labor laws regarding working hours and conditions.

Safe and clean working environments: ensuring employee health and safety, accident prevention, and hygienic workplaces.

Environmental responsibility: requiring valid permits and certifications, pollution prevention, GHG emissions disclosure, energy use monitoring, waste and water management, responsible sourcing of raw materials, and more.

Whistleblowing channels: for reporting significant irregularities.

In addition to the Supplier Code, Vivacom applies a Procurement Policy designed to promote transparency, fairness, and sustainability throughout the sourcing process.

Procurement policy: Key elements

Conducting tenders via an **electronic procurement system** to ensure full visibility, transparency traceability, and competition among the qualified suppliers (target is to have at least minimum 3 bidders).

Adherencetothe **"four-eyes" principle**, ensuringseparate responsibilities and segregation of responsibilities for bid comparison, contract signing, and supplier performance evaluation.

Evaluation criteria that include supplier expertise, capacity, price, legal compliance, financial health, innovation, as well as health, safety, and environmental performance.

Ongoing **supplier performance monitoring**, including regular audits and feedback, to encourage continuous improvement.

In 2024 Vivacom also introduced two dedicated sourcing policies to enhance transparency and ethical practices in the supply chain. The Responsible Sourcing Policy outlines key expectations for suppliers to uitaphold environmental, social, and governance standards throughout their operations and supply chains. The Conflict Minerals Policy ensures that suppliers avoid sourcing minerals or metals from conflict-affected or high-risk areas.

Screening for third parties

Vivacom has fully implemented the United Group Third-Party Due Diligence Policy, ensuring risk-based vetting of all third parties before onboarding or renewing contracts. A robust sanctions risk assessment framework supports the policy, enabling the identification and mitigation of risks related to prohibited parties, entities or regions. The overall process includes:

- Screening against global sanctions lists, watchlists, and politically exposed persons (PEPs)
- Monitoring for adverse media coverage and reputational risks
- Ongoing reassessment throughout the business relationship

In 2024, a total of 1,265 third-party entities were screened through a dedicated platform, enhancing compliance throughout the supply chain.

Integrated management systems

Vivacom operates under a fully integrated management system aligned with internationally recognized ISO standards, supporting continuous improvement and effective risk management across all business operations.

Maintained certifications in:

- **ISO 9001:2015** – Quality Management Systems
- **ISO 14001:2015** – Environmental Management Systems
- **ISO 45001:2018** – Occupational Health and Safety Management Systems
- **ISO/IEC 20000-1:2018** – Information Technology, Service Management
- **ISO/IEC 27001:2022** – Information Security, Cybersecurity and Privacy Protection
- **ISO/IEC 27018:2019** – Information Technology, Security Techniques, Code of Practice for Protecting Personally Identifiable Information (PII) in Public Clouds Acting as PII Processors
- **ISO/IEC 27701:2021** – Security Techniques – Extension to ISO/IEC 27001 and ISO/IEC 27002 for Privacy Information Management
- **ISO 37001:2016** – Anti-bribery management systems.



Looking ahead

- ✓ Continued development of ethical culture and awareness initiatives.
- ✓ Maintain and enhance compliance across all operations.
- ✓ Introduce AI-related ethics as a new area in our business ethics framework.



Risk Management



Highlights from 2024

- ✓ Reassessment of the Enterprise Risk Management (ERM) program
- ✓ Advancing our ERM process by performing more granulated Compliance, Privacy and Sustainability risk assessments
- ✓ Expansion of climate scenario analysis to include two additional environmental risks

“Risk is not something to be feared but something to be understood, managed, and used as a foundation for resilience and innovation. At Vivacom, we manage risk as an integral part of our commitment to responsible business, operational excellence, and long-term value creation.

Mihaela Prakova | Risk & Fraud Management, Local Compliance Manager



Risk management approach

Vivacom continues to apply a structured and forward-looking approach to risk management, aligned with the COSO (Committee of Sponsoring Organizations of the Treadway Commission) framework and ISO 31000 standards, and integrated into United Group's overarching risk methodology.

The Enterprise Risk Management (ERM) program provides a comprehensive structure for identifying, assessing, mitigating, monitoring and reporting risks that could impact the achievement of strategic objectives. In 2024, Vivacom reassessed its ERM program to reflect changes in the external environment and internal priorities.

The company classifies risks into key categories: operational, financial, technological, legal and regulatory, compliance, and environmental. Risk registers are maintained and monitored both at local and Group level, while regular risk reporting supports strategic decision-making at all levels.

The Risk Management function, a centralized function on a group-level, is responsible for governing the ERM framework, ensuring the development and implementation of consistent methodology and policy. This includes maintaining risk registers, preparing regular and ad hoc risk reports, and supporting the prioritization of risks, as well as the design and execution of mitigation measures.

Risk management process	
Identification	• Identification of potential risks • Top-down approach aligned with Group strategy
Assessment	• Evaluation of the likelihood and potential impact of risks • Conducted both individually and collectively
Response	• Prioritizing risks based on assessment results • Development and regular update of mitigation plans • Assigned responsibilities and timelines
Monitoring and reporting	• Ongoing tracking of risk mitigation • Annual risk reporting

In 2024, the risk assessment framework for compliance, data protection, and environmental risks has been refined with a more detailed Level 2 breakdown. This added layer of granularity enables deeper and more precise analysis, allowing each risk category to be evaluated with greater specificity. By dividing these risks into subcategories, it becomes easier to uncover subtle vulnerabilities, enhance mitigation strategies, and support more informed decision-making. This advancement fosters a proactive, data-driven approach that strengthens governance and overall risk management.

Integrating environmental considerations

Vivacom recognizes that global risk landscape is being reshaped and intensified by climate changes. This requires urgent and transformative action to achieve a net-zero future by 2050. In response to these challenges, Vivacom, as a member of United Group, continues to enhance its climate risk management approach through its ERM, in alignment with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations. Recognizing climate change as a strategic business risk, this allows us to better identify, assess, and mitigate both physical and transition-related climate risks. The integration of environmental considerations into our ERM process allows us to strengthen our capacity to adapt, innovate, and drive sustainable growth.

Building on last year’s climate scenario analysis, United Group expanded the assessment in 2024 to cover two additional climate risks – the risk of wildfires (physical risk) and renewable electricity pricing exposure (transition risk). Taking into consideration United Group approach, Vivacom evaluated the potential financial implications based on its own operations and data.

- Wildfires (physical risk) – linked to the increased frequency and intensity of extreme weather events.
- Renewable electricity pricing exposure (transition risk) – linked to market and policy shifts in the decarbonization pathway.

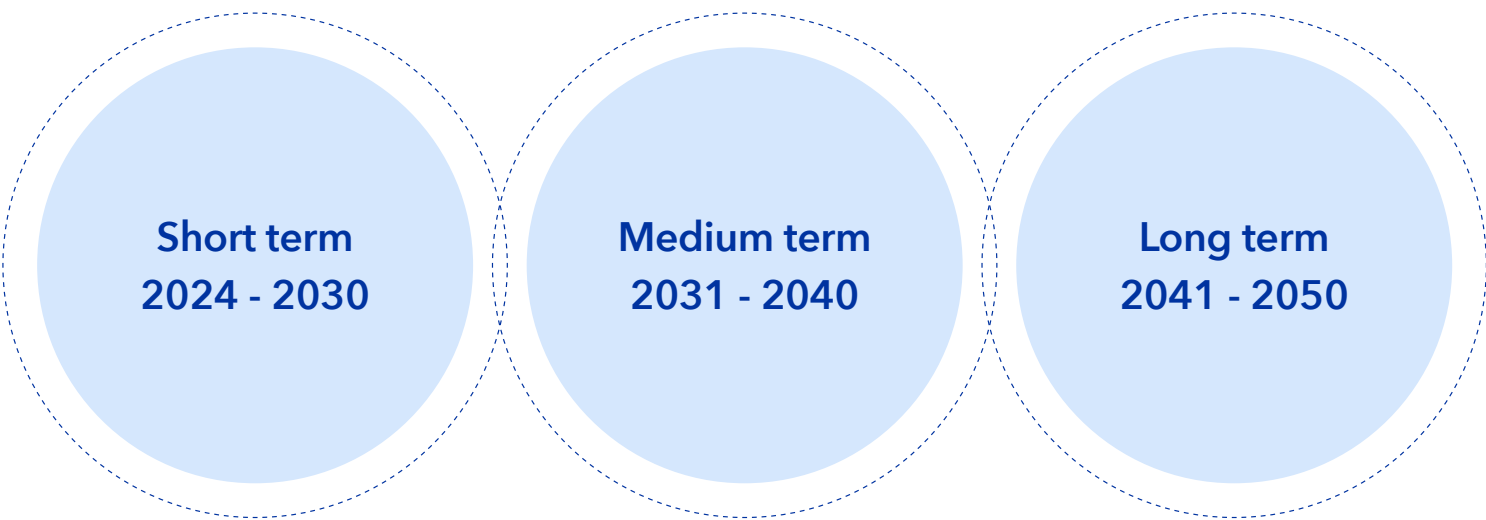
The scenario analysis evaluates the average value-at-stake as a result of environmental risk materializing by comparing outcomes across the following scenarios and time-frames, allowing us to stress-test Vivacom’s strategic resilience to climate risks.

- Current policies scenario: This scenario includes all pledged policies even if not yet implemented. It assumes that the moderate and heterogeneous climate ambition reflected in the conditional Nationally Determined Contributions (NDCs) at the beginning of 2021 continues over the 21st century. Emissions decline but lead nonetheless to 2.6°C of warming associated with moderate to severe physical risks.
- Net zero scenario (<1.5°C): Net zero 2050 represents the implementation of stringent climate policies and the global take-up of clean technologies that limit global average temperature increase to below 1.5°C. This scenario stresses the company’s resilience to the impact of transition risks.
- High temperatures scenario (>4°C): High temperatures represent an overall lack of climate change mitigation globally. This results in a >4°C of global average temperature increase, and a very high increase in the frequency and intensity of extreme weather events. This scenario stresses the company’s resilience to the impact of physical risks.

- High temperatures scenario (>4°C): High temperatures represent an overall lack of climate change mitigation globally. This results in a >4°C of global average temperature increase, and a very high increase in the frequency and intensity of extreme weather events. This scenario stresses the company’s resilience to the impact of physical risks.

Risk		Scenario comparison	
Transition risk	Current policies scenario	vs	Net Zero scenario (<1,5°C)
	Current policies scenario	vs	High Temperatures scenario (>4°C)

Time frames:



Transition Risks

Vivacom, as a technology-driven company, relies heavily on electricity, making it sensitive to price fluctuations and changes in decarbonization policies. Therefore, we assessed two transition risks that could arise if decarbonization efforts fall short of our net-zero strategy.

Carbon pricing exposure: slow pace of implementing the necessary technological improvements to achieve net-zero emission targets hinders decarbonization progress. This could lead to higher emissions and increasing costs associated with carbon pricing.

Renewable electricity pricing exposure: delays in decarbonization could lead to greater dependence on Guarantees of Origin (GO) to achieve net-zero goals. Arising demand for renewable electricity is expected to drive GO prices up leading to increased operational costs for companies lacking direct access to renewable energy sources.

To mitigate these risks, the company is actively investing in renewable energy through large-scale solar and wind projects, reducing the dependence to energy markets and support the transition to a low-carbon economy.

Physical risks

As a leading telecommunications infrastructure owner and operator in Bulgaria, Vivacom is exposed to potential damage from climate conditions.

The climate scenario analysis examines river as a result of increased precipitation, particularly with highest impacts in the scenarios with temperature increases above 4°C, are expected to pose greater challenges after 2041 due to higher frequency and intensity of such events.

In 2024, our analysis was expanded to include the impacts of wildfires alongside flooding. Increasing temperatures and extended dry periods are driving more frequent and severe wildfire events, posing risks of substantial damage to network infrastructure and leading to higher costs for repairs, replacements, and potential service disruptions.

To address these risks, Vivacom maintains flood and wildfire insurance coverage and allocates sufficient capital to cover anticipated costs.

		Potential impact across time horizons		
Risk	Scenario	Short-term	Medium-term	Long-term
		2024-2030	2031-2040	2041-2050
Transition risk - Carbon pricing	1.a. Current policies without mitigation activities	Medium	Very High	Very High
	1.b. Current policies with mitigation activities	Low	Medium	Medium
	2.a Stress scenario without mitigation activities	High	Very High	Very High
	2.b. Stress scenario with mitigation activities	Low	High	Very High
Transition risk - GOs	1.a. Current policies without mitigation activities	Low	Low	Low
	1.b. Current policies with mitigation activities	Low	Low	Low
	2.a Stress scenario without mitigation activities	Low	Low	Medium
	2.b. Stress scenario with mitigation activities	Low	Low	Low
Physical risk - Flooding	1. Current policies	Low	Low	Low
	2. Stress scenario	Low	Low	Medium
Physical risk - Wildfires	1. Current policies	Low	Low	Low
	2. Stress scenario	Low	Low	Low

Annex: GRI content index and indicators

GRI content index

GRI content index		
Statement of use	Vivacom Bulgaria has reported the information cited in this GRI content index for the period 01.01.2024-31.12.2024 with reference to the GRI Standards.	
GRI 1 used	GRI 1: Foundation 2021	
GRI standard	Disclosure	Location and comments
GRI 2: General Disclosures 2021	2-1 Organizational details	Vivacom at a glance, p. 06
	2-1 Organizational details	About the report, p. 03
	2-3 Reporting period, frequency and contact point	About the report, p. 03
	2-4 Restatements of information	No restatements. Following the acquisition of Bulsatcom on July 1, 2024, the company is continuously reviewing its environmental data to reflect the integration. If a restatement is required, it will be made in the next report.
	2-5 External assurance	The 2024 data is fully audited at group level by United Group's external auditor. As the company with the largest share of impact on the group's results, Vivacom's data is subject to sample selection audit as part of the group-level assurance process.
	2-6 Activities, value chain and other business relationships	Vivacom at a glance, p. 06 Climate and energy, p. 24-28 Annex: GRI content index and indicators, p. 86
	2-7 Employees	Vivacom at a glance, p. 06 Diversity, equality and inclusion, - p. 70-72 Annex: GRI content index and indicators, p. 86
	2-8 Workers who are not employees	Annex: GRI content index and indicators, p. 86
	2-9 Governance structure and composition	Governance approach, p . 18-19
	2-10 Nomination and selection of the highest governance body	Governance approach, p . 18-19
	2-11 Chair of the highest governance body	Governance approach, p . 18-19
	2-12 Role of the highest governance body in overseeing the management of impacts	Governance approach, p . 18-19
	2-13 Delegation of responsibility for managing impacts	Governance approach, p . 18-19
	2-14 Role of the highest governance body in sustainability reporting	Governance approach, p . 18-19
	2-15 Conflicts of interest	Business ethics, p. 75
	2-16 Communication of critical concerns	Business ethics, p. 76 We have established robust mechanisms to ensure that critical concerns are promptly communicated to the highest governance body. Risk & Fraud Management, along with the Local Compliance function, play a key role in this process. Vivacom's compliance system adheres to Group compliance policies and is subject to comprehensive oversight by our Local Compliance and Risk & Fraud function. This function reports directly to the Executive Director of Compliance, Risk & Sustainability, who in turn reports to the CEO and the Board of Directors of United Group. This structure balances the benefits of centralized control and standardization with the flexibility and responsiveness of local operations.
	2-17 Collective knowledge of the highest governance body	Governance approach, p. 18-19
	2-18 Evaluation of the performance of the highest governance body	The company's management undergoes an annual performance evaluation, consistent with the process applied to all employees. In addition, members of management receive eNPS feedback on an annual basis from their teams and direct reports.
	2-19 Remuneration policies	At Vivacom, equal treatment of employees, regardless of gender, age, or other factors, is a core principle in all HR policies, including remuneration. Our policies and evaluation criteria ensure objectivity in setting goals, measuring performance, and determining compensation.
	2-20 Process to determine remuneration	Compensation is based on the position's specifics, required knowledge and skills, and the employee's qualifications and performance. Salaries are based on the role and individual performance, within budget limits, ensuring fairness.
	2-21 Annual total compensation ratio	The company has an established internal procedure for monitoring and calculating compensation ratios. These ratios are reviewed periodically and taken into account in the context of remuneration policies, workforce planning, and internal equity considerations. The approach is designed to support fair and consistent compensation practices in line with the company's broader human resources objectives.

GRI content index		
Statement of use	Vivacom Bulgaria has reported the information cited in this GRI content index for the period 01.01.2024-31.12.2024 with reference to the GRI Standards.	
GRI 1 used	GRI 1: Foundation 2021	
GRI standard	Disclosure	Location and comments
GRI 2: General Disclosures 2021	2-22 Statement on sustainable development strategy	Letter from our CEO, p. 04
	2-23 Policy commitments	Business ethics, p. 75 -77 Policy commitments are presented under each topic in the report, reflecting the scope of the relevant policies in place and the commitments undertaken.
	2-24 Embedding policy commitments	Business ethics, p. 75,77 Embedding policy commitments is presented under each topic in the report, reflecting the scope of the relevant policies in place and the commitments undertaken.
	2-25 Processes to remediate negative impacts	Business ethics, p. 75, 77
	2-26 Mechanisms for seeking advice and raising concerns	Business ethics, p. 76
	2-27 Compliance with laws and regulations	Business ethics, p. 75
	2-28 Membership associations	Membership and awards, p. 12-14
	2-29 Approach to stakeholder engagement	Climate and energy, p. 24-28 Business ethics, p. 75-78 Smart solutions and innovations, p. 52-54
	2-30 Collective bargaining agreements	Diversity, equality and inclusion, p. 70-72 Annex: GRI content index and indicators, p.
GRI 3: Material Topics 2021	3-1 Process to determine material topics	ESG topics, p. 20-22
	3-2 List of material topics	ESG topics, p. 20-22
	3-3 Management of material topics	The management approach for each topic is detailed in the relevant sections of the report, explaining their significance.
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Vivacom at a glance, p. 11
	201-2 Financial implications and other risks and opportunities due to climate change	Risk management, p. 80-82
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Network coverage and reliability, p. 36-37 Digital inclusion, p. 49-51
	203-2 Significant indirect economic impacts	Network coverage and reliability, p. 36-37 Digital inclusion, p. 49-51
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Business ethics, p. 75
	205-2 Communication and training about anti-corruption policies and procedures	Business ethics, p. 75 Annex: GRI content index and indicators, p. 90
	205-3 Confirmed incidents of corruption and actions taken	In 2024, there were no confirmed incidents of corruption at Vivacom
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Business ethics, p.77
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Climate and energy, p.25 Annex: GRI content index and indicators, p. 87
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Climate and energy, p. 25 Annex: GRI content index and indicators, p. 87
	305-2 Energy indirect (Scope 2) GHG emissions	Climate and energy, p. 25 Annex: GRI content index and indicators, p. 87
	305-3 Other indirect (Scope 3) GHG emissions	Climate and energy, p. 26 Annex: GRI content index and indicators, p. 87
	305-4 GHG emissions intensity	Climate and energy, p. 25-26 Annex: GRI content index and indicators, p. 87
	305-5 Reduction of GHG emissions	Climate and energy, p. 25-26 Annex: GRI content index and indicators, p. 87

GRI content index		
Statement of use	Vivacom Bulgaria has reported the information cited in this GRI content index for the period 01.01.2024-31.12.2024 with reference to the GRI Standards.	
GRI 1 used	GRI 1: Foundation 2021	
GRI standard	Disclosure	Location and comments
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Circular economy and waste, p. 30
	306-2 Management of significant waste-related impacts	Circular economy and waste, p. 30-33
	306-3 Waste generated	Circular economy and waste, p. 30 Annex: GRI content index and indicators, p. 87
	306-4 Waste diverted from disposal	Circular economy and waste, p. 30 Annex: GRI content index and indicators, p. 87 Vivacom does not have data on waste sent to landfill, as all waste is handed over to licensed contractors for proper treatment under contractual agreements.
GRI 308: Supplier Environmental Assessment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	Business ethics, p.77
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Human capital, p. 72
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees are the following: Health care, Disability and invalidity coverage, Christmas vouchers, Food Vouchers, Additional days paid leave, Day off for Birthday, Sport Cards, Special discounts for all Vivacom services, Pscological Care, Gifts (Retirement), Gifts (Women's day), Gifts (Christmas employee), Gifts for 1 March for employees, Easter gifts for meployees, Special price when purchasing devices, Allowance for mobile phone use.	Human capital, p. 72
	401-3 Parental leave	Human capital, p. 72 Of the 5,199 employees entitled to parental leave, 256 took leave during the reporting period, 242 returned to work after their leave ended, and 158 remained employed 12 months after their return.
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Health & Safety, p. 67
	403-2 Hazard identification, risk assessment, and incident investigation	Health & Safety, p. 67, Business ethics, p. 80
	403-3 Occupational health services	Health & Safety, p. 67-68 The functions of occupational health services are defined by law. Their main roles include: a) Advising and supporting employers to ensure healthy and safe working conditions, b) Monitoring, analyzing, and assessing employees' health status, c) Participating in the workplace risk assessment process. Quality is ensured through a competitive supplier selection process in line with the company's Procurement procedures. Information about the service is made available on the company's internal portal. The employer does not have access to individual employee health records, as all health data is stored and managed exclusively by the occupational health service provider. For workers who are not directly employed by the company but whose work or workplace is under the organization's control, occupational health and safety obligations are regulated through contractual agreements.
	403-4 Worker participation, consultation, and communication on occupational health and safety	Health & Safety, p. 68
	403-5 Worker training on occupational health and safety	Health & Safety, p. 68
	403-6 Promotion of worker health	Health & Safety, p. 68-69
	403-9 Work-related injuries	Health & Safety, p. 67 Annex: GRI content index and indicators, p. 90
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Human capital, p. ; 63 Annex: GRI content index and indicators, p. 88
	404-2 Programs for upgrading employee skills and transition assistance programs	Human capital, p. 63
	404-3 Percentage of employees receiving regular performance and career development reviews	Human capital, p. ; 63-65 Annex: GRI content index and indicators, p.88 In 2024, 100% of total employees received regular performance and career development review, or 41% of female employee and 59% of male employees.
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Diversity, equality and inclusion, p. 71 Annex: GRI content index and indicators, p. 88
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Vivacom had no incidents of discrimination in 2024.
GRI 414: Supplier Social Assessment 2016	414-2 Negative social impacts in the supply chain and actions taken	Business ethics, p. 77
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Data privacy, p. ; 47
		Cyber security, p. 43-44 Annex: GRI content index and indicators, p. 90

Annex: GRI content index and indicators

GRI indicators

Topic	GRI disclosure	Indicator	Unit	2024 Total
Mandatory disclosures according to GRI 2	GRI 2-6 Activities, value chain and other business relationships	Net sales	thousand BGN	1,429,909
	GRI 2-7 Employees	Total number of employees	no.	5,199
		Total number of employees - female	no.	2,142
		Total number of employees - male	no.	3,057
		Total number of employees - permanent	no.	5,121
		Total number of employees - permanent (women)	no.	2,090
		Total number of employees - permanent (men)	no.	3,031
		Total number of employees - temporary	no.	78
		Total number of employees - temporary (women)	no.	52
		Total number of employees - temporary (men)	no.	26
		Total number of employees - full-time	no.	5,145
		Total number of employees - full-time (women)	no.	2,110
		Total number of employees - full-time (men)	no.	3,035
		Total number of employees - part-time	no.	54
		Total number of employees - part-time (women)	no.	32
		Total number of employees - part-time (men)	no.	22
	GRI 2-8 Workers who are not employees	Total number of non-employee workers	no.	97
	GRI 2-16 Communication of critical concerns	Number of critical concerns that were communicated to the highest governance body during the reporting period, by:	no.	13
		- concerns related to governance topics	no.	13
		- concerns related to social topics	no.	
	GRI 2-21 Annual total compensation ratio	- concerns related to environmental topics	no.	
		Ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual)	%	8,8
		Total number of significant instances of non-compliance with laws and regulations during the reporting period by:	no.	1
	GRI 2-27 Compliance with laws and regulations	- instances for which fines were incurred	no.	0
		- instances for which non-monetary sanctions were incurred	no.	1
		Total monetary value of significant instances of non-compliance with laws and regulations during the reporting period by:	BGN	0
		- instances for which fines were incurred	BGN	0
		- instances for which non-monetary sanctions were incurred	BGN	0
		Total number of fines for instances of noncompliance with laws and regulations that were paid during the reporting period by:	no.	18
		- fines for instances of non-compliance with laws and regulations that occurred in the current reporting period	no.	1
		- fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods	no.	17
		Total monetary value of fines for instances of noncompliance with laws and regulations that were paid during the reporting period by:	BGN	47,750
		- fines for instances of non-compliance with laws and regulations that occurred in the current reporting period	BGN	10,000
		- fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods	BGN	37,750
	GRI 2-30 Collective bargaining agreements	Percentage of total employees covered by collective bargaining agreements	%	51%

Topic	GRI disclosure	Indicator		Unit	2024
Climate and energy	GRI 302-1 Energy consumption within the organization	Total fuel consumption within the organization from non-renewable sources		kWh	20,562,893
		Fuel consumption (non-renewable) by type:	Diesel	litres	1,490,628
			Gasoline/Petrol	litres	567,067
			Natural gas	m3/ kWh/ MJ	-
			Coal	tonnes	-
			LPG	Litres	13,733
		Total energy consumption		kWh	162,095,080
		Energy consumption by type:	Electricity consumption	kWh	159,598,864
			Heating consumption	kWh	2,496,216
			Cooling consumption	kWh	-
			Steam consumption	kWh	-
Climate and energy	GRI 302-4 Reduction of energy consumption	Reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives		GJ	
Climate and energy	GRI 305-1 Direct (Scope 1) GHG emissions	Gross direct (Scope 1) GHG emissions		t CO2e	5,749
Climate and energy	GRI 305-2 Energy indirect (Scope 2) GHG emissions	Gross location-based energy indirect (Scope 2) GHG emissions		t CO2e	76,705
		Gross market-based energy indirect (Scope 2) GHG emissions		t CO2e	32,939
Climate and energy	GRI 305-3 Other indirect (Scope 3) GHG emissions	Gross other indirect (Scope 3) GHG emissions		t CO2e	48,486
Climate and energy	GRI 305-4 GHG emissions intensity	Emissions intensity ratio	total GHG emissions/net revenue	t CO2e/M BGN	0,1
Climate and energy	GRI 305-5 Reduction of GHG emissions	GHG emissions reduced as a result of reduction initiatives		t CO2e	49755
		GHG emissions reduced by scope:	Scope 1	t CO2e	0
			Scope 2 (Market-based)	t CO2e	24,728
			Scope 3	t CO2e	25,027
Circular economy and waste	GRI 306-3 Waste generated	Total weight of waste generated		tonnes	915
		A breakdown of this total by composition of the waste (e.g. metal, plastic, etc.):	Batteries	tonnes	155
			Cables	tonnes	465
			Electronic equipment	tonnes	45
			Paper and cardboard	tonnes	48
			Scrap metal	tonnes	151
			Wood	tonnes	3
			Construction waste	tonnes	42
			Plastic	tonnes	6
				tonnes	915
Circular economy and waste	GRI 306-4 Waste diverted from disposal	Total weight of waste diverted from disposal		tonnes	915
		A breakdown of this total by composition of the waste:	Batteries	tonnes	155
			Cables	tonnes	465
			Electronic equipment	tonnes	45
			Paper and cardboard	tonnes	48
			Scrap metal	tonnes	151
			Wood	tonnes	3
			Construction waste	tonnes	42
			Plastic	tonnes	6

Topic	GRI disclosure	Indicator		Unit	2024
Human capital	GRI 401-1New employee hires and employee turnover	Number of new employees		number	952
		By gender:	Male	number	514
			Female	number	438
		Hiring rate		%	18,3%
		By gender:	Male	%	
			Female	%	
		New employees < 30 years		number	572
		By gender:	Male	number	
			Female	number	
		New employees >= 30 < 50 years		number	320
		By gender:	Male	number	
			Female	number	
Human capital	GRI 404-1Average hours of training per year per employee	New employees >= 50 years		number	47
		Average hours of training per employee*		number	25
		By gender:	Male	number	18
			Female	number	28
Human capital	GRI 404-3 Percentage of employees receiving regular performance and career development reviews	Percentage of employees who receive a regular performance and career development review		%	100%
		By gender:	Male	number	59
			Female	number	41
Diversity, equality and inclusion	GRI 405-1 Diversity of governance bodies and employees	Board members		number	17
		By gender:	Male	number	13
			Female	number	4
		Board members/executives < 30 years		%	0%
		By gender:	Male	%	-
			Female	%	-
		Board members/executive >= 30 < 50 years		%	97%
		By gender:	Male	%	77%
			Female	%	30%
		Board members/executive >= 50 years		%	10%
By gender:	Male	%	10%		
	Female	%	-		

*Average value compared to the average training hours for employees at Vivacom, Bulsatcom, United Fiber, and United Group Bulgaria. The average training hours for Vivacom are 44.

Topic	GRI disclosure	Indicator		Unit	2024
Diversity, equality and inclusion	GRI 405-1 Diversity of governance bodies and employees	Number of employees by category:			
		CEO/Managing Director	Male	number	2
			Female	number	0
		Top Management	Male	number	6
			Female	number	1
		Executive Director	Male	number	17
			Female	number	5
		Senior Director	Male	number	4
			Female	number	1
		Director	Male	number	24
			Female	number	14
		Senior Manager	Male	number	74
			Female	number	50
		Manager	Male	number	92
			Female	number	64
		Team leader	Male	number	160
			Female	number	155
		Expert	Male	number	269
			Female	number	148
		Professional	Male	number	1174
			Female	number	917
		Specialist	Male	number	1228
			Female	number	783
		Para Professional	Male	number	7
			Female	number	5
		% of employees by category:			
		CEO/Managing Director	Male	%	0%
			Female	%	0%
		Top Management	Male	%	2%
			Female	%	1%
		Executive Director	Male	%	1%
			Female	%	2%
		Senior Director	Male	%	0%
			Female	%	0%
		Director	Male	%	0%
			Female	%	0%
		Senior Manager	Male	%	5%
			Female	%	2%
		Manager	Male	%	2%
			Female	%	2%
		Team leader	Male	%	2%
			Female	%	2%
		Expert	Male	%	9%
			Female	%	3%
		Professional	Male	%	24%
			Female	%	13%
		Specialist	Male	%	21%
			Female	%	9%
		Para Professional	Male	%	0%
			Female	%	0%

Topic	GRI disclosure	Indicator		Unit	2024
Diversity, equality and inclusion	GRI 406-1 Incidents of discrimination and corrective actions taken	Total number of incidents of discrimination during the reporting period		number	0
Health and safety	GRI 403-9 Work-related injuries	For all employees:	Number of fatalities as a result of work-related injury	number	0
			Rate of fatalities as a result of work-related injury	rate	0,0
			Number of high-consequence work-related injuries (excluding fatalities)	number	0
			Rate of high-consequence work-related injuries (excluding fatalities)	rate	0,0
			Number of recordable work-related injuries	number	8
			Rate of recordable work-related injuries	rate	0,2%
			Number of hours worked	number	8,709,980
Data privacy/ Cybersecurity	GRI 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Total number of substantiated complaints received concerning breaches of customer privacy, categorized by complaints received from outside parties and substantiated by the organization		number	13
	GRI 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Total number of substantiated complaints received concerning breaches of customer privacy, categorized by complaints from regulatory bodies		number	5
	GRI 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Total number of identified leaks, thefts, or losses of customer data		number	9
Quality services	GRI 417-2 Incidents of non-compliance concerning product and service information and labeling	Total number of incidents of non-compliance with regulations concerning product and service information and labeling resulting in a fine or penalty		number	4
	GRI 417-2 Incidents of non-compliance concerning product and service information and labeling	Total number of incidents of non-compliance with regulations concerning product and service information and labeling resulting in a warning		number	2
	GRI 417-3 Incidents of non-compliance concerning marketing communications	Total number of incidents of non-compliance with regulations concerning marketing communications, including advertising, promotion, and sponsorship resulting in a fine or penalty		number	0
	GRI 417-3 Incidents of non-compliance concerning marketing communications	Total number of incidents of non-compliance with regulations concerning marketing communications, including advertising, promotion, and sponsorship resulting in a warning		number	0
	GRI 417-3 Incidents of non-compliance concerning marketing communications	Total number of incidents of non-compliance with voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship		number	0
Business ethics	GRI 205-2 Communication and training about anti-corruption policies and procedures	Percentage of governance body members that the organization’s anti-corruption policies and procedures have been communicated to		%	100
		Percentage of employees atthat the organization’s anti-corruption policies and procedures have been communicated to.		%	100
	GRI 206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Number of legal actions pending or completed during the reporting period regarding anti-competitive behavior and violations of anti-trust and monopoly legislation in which the organization has been identified as a participant.		number	3