BIODIVERSITY CONSERVATION POLICY OF UZBEKTELECOM JOINT STOCK COMPANY

Tashkent 2026

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OF UZBEKTELECOM JOINT STOCK COMPANY

1. Introduction and objectives

Uzbektelecom JSC (hereinafter referred to as the “Company”) recognizes the conservation of biodiversity and ecosystems as an integral part of sustainable development and corporate responsibility. This Policy establishes the principles, commitments, and mechanisms aimed at minimizing the impact of the Company’s activities on natural ecosystems, preserving forests and rare species, as well as ensuring compliance with international and national environmental standards.

The purpose of this Policy is to ensure the consistent implementation of the “No Net Loss” and “No Deforestation” principles in the planning, construction, and operation of the Company’s infrastructure facilities.

In particular:

- prevention of biodiversity loss and deforestation;
- reduction of the impact of natural and climate-related risks;
- integration of the international TNFD and TCFD principles into the corporate governance system;
- ensuring transparency and disclosure of information in accordance with international standards.

2. Scope of application

This Policy applies to all structural divisions and branches of the Company, all service delivery processes, and other activities carried out by the Company, including:

- planning of infrastructure facilities and designation of nominal points (base stations, communication lines, etc.);
- any economic activities related to the use of land and natural resources;
- operation of communication facilities and engineering systems;
- cooperation with contractors and suppliers whose activities may have an impact on the natural environment.

3. Regulatory references

The following legal, regulatory and internal documents were used in the development of this Policy:

Law of the Republic of Uzbekistan No. 754-XII dated 9 December 1992 “On Nature Protection”;

Law of the Republic of Uzbekistan No. LRU-1036 dated 24 February 2025 “On Environmental Expertise, Environmental Impact Assessment and Strategic Environmental Assessment”;

Law of the Republic of Uzbekistan No. 353-I dated 27 December 1996 “On Protection of Atmospheric Air”;

Decree of the President of the Republic of Uzbekistan No. DP-46 dated 30 December 2021 “On Measures to Accelerate Landscaping and Further Effective Organization of Tree Protection in the Republic";

Decree of the President of the Republic of Uzbekistan No. DP-6079 dated 5 October 2020 "On Approval of the Strategy 'Digital Uzbekistan – 2030' and Measures for Its Effective Implementation";

Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 484 dated 11 June 2019 "On Approval of the Biodiversity Conservation Strategy of the Republic of Uzbekistan for 2019–2028";

Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 699 dated 19 November 2021 "On Measures for Further Development of the Telecommunications Infrastructure of the Republic of Uzbekistan";

Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 820 dated 11 October 2018 "On Measures for Further Improvement of Economic Mechanisms for Ensuring Nature Protection";

ISO 14001:2015 — Environmental Management System (EMS);

ESG Strategy of Uzbektelecom JSC for 2025–2030;

Sustainable Development Policy of Uzbektelecom JSC;

Environmental and Energy Policy of Uzbektelecom JSC;

Environmental and Social Management System of Uzbektelecom JSC.

4. Terms, definitions and abbreviations

4.1 Terms and Definitions

Biodiversity — the diversity of living organisms, including diversity at the species, genetic, and ecosystem levels.

No Deforestation — the principle of preventing deforestation in the course of implementing activities and projects.

No Net Loss — the principle of preventing a decline from the baseline level through compensation for biodiversity losses.

4.2 Abbreviations

ESG (Environmental, Social, and Governance) — environmental, social, and governance factors used in assessing the Company's sustainability.

EIA (Environmental Impact Assessment) — the process of assessing environmental impacts prior to project implementation.

GRI 101 (Global Reporting Initiative 101) — the core standard of the Global Reporting Initiative establishing general principles for the preparation and disclosure of non-financial reporting.

LEAP (Locate, Evaluate, Assess, Prepare) — the TNFD approach for assessing and managing nature-related impacts and risks.

SanPiN (Sanitary Rules and Norms) — sanitary rules and regulations.

TCFD (Task Force on Climate-related Financial Disclosures) — recommendations on the disclosure of climate-related risks.

TNFD (Taskforce on Nature-related Financial Disclosures) — recommendations on the disclosure of nature-related risks.

5. Key principles and commitments

The Company undertakes the following commitments:

1. compliance with international standards and applicable national legislation in the field of biodiversity and environmental protection (TNFD, GRI 101, the United Nations Convention on Biological Diversity, the Company's environmental and social management systems, ISO 14001, and the Law of the Republic of Uzbekistan "On Nature Protection");
2. assessment of environmental impacts during the implementation of infrastructure projects, prevention of deforestation and damage to valuable ecosystems, as well as implementation of restoration measures in the event of residual impacts;
3. conservation of endangered and rare species, as well as prevention of the destruction of their natural habitats;
4. implementation of the "No Net Loss" principle — compensation or restoration of natural areas in cases where impacts cannot be fully avoided;
5. integration of the EIA process into decision-making for all new projects in order to assess impacts on biodiversity;
6. cooperation with government authorities, non-governmental organizations, and local communities for the joint implementation of nature conservation initiatives;
7. continuous improvement of transparency and accountability, including disclosure of biodiversity-related information in annual ESG reports and other publications.

6. Approach to management and minimization of biodiversity impacts

The Company applies a systematic approach based on the identification, assessment, and management of environmental risks and biodiversity impacts:

- impact management is carried out within the framework of the environmental management system (ISO 14001) aimed at reducing adverse impacts on the environment and biodiversity;
- all new and existing infrastructure projects undergo environmental and biodiversity impact assessment procedures;
- during the planning process, areas of natural value, protected areas, forest areas, landscape features, and animal migration routes are taken into account;
- in cases where impacts cannot be fully avoided, compensatory measures shall be implemented, including ecosystem restoration, tree planting, and support for natural areas;
- the "No Net Loss / No Deforestation" principles are implemented throughout all stages of the project life cycle in order to preserve forest cover and biodiversity;
- construction routes and sites are optimized in order to prevent impacts on valuable natural areas;
- continuous monitoring and prevention of relevant violations across operational areas are carried out.

Within the framework of infrastructure and investment project implementation, the Company applies the following measures aimed at minimizing potential impacts on the environment and biodiversity:

- taking into account areas of natural value, protected areas, forest areas, and landscape features during telecommunications network planning;

- ensuring minimal land use during the construction of telecommunications networks;
- assessing of the environmental impact of telecommunications facilities during the design and operation of radio engineering facilities in accordance with SanPiN requirements;
- ensuring that radiofrequency radiation transmitted through airwaves does not exceed established sanitary standards;
- maintaining noise levels generated by telecommunications equipment within established regulatory limits;
- using existing infrastructure (cable ducts, base stations, buildings, metal structures, and infrastructure of other operators) in order to reduce the need for new construction;
- minimizing the volume of earthworks during cable laying and facility construction, including through the use of overhead communication lines and optimization of base station and equipment types;
- optimizing occupied areas in order to reduce physical impact on the territories where facilities are located;
- optimizing the operation of communication facilities and engineering systems and reducing physical impacts on the territories where facilities are located;
- cooperating with the State Environmental Expertise Center in order to obtain recommendations on preventing or minimizing impacts on biodiversity and ecosystems, as well as for the inspection of new facilities.

7. Key performance indicators (KPIs)

The Company takes into account the indirect and cumulative impacts of telecommunications activities on biodiversity (including infrastructure, energy consumption, land use, waste, and supply chains) and integrates the management of nature-related risks into its ESG strategy.

Impact management is carried out in accordance with the recommendations of the Taskforce on Nature-related Financial Disclosures (TNFD) and through the application of the LEAP (Locate-Evaluate-Assess-Prepare) approach. This approach includes the following stages:

- Locate — identification of the geographical locations of assets and assessment of their proximity to environmentally sensitive areas;
- Evaluate — analysis of the Company’s dependencies on, and impacts upon, natural resources and ecosystems;
- Assess — assessment of nature-related and regulatory risks associated with biodiversity;
- Prepare — development of measures aimed at risk management and impact mitigation.

The objectives of the Kunming-Montreal Global Biodiversity Framework are also taken into consideration in the development of these approaches.

Key biodiversity metrics are determined in accordance with the Company’s ESG Strategy for 2025–2030 and include the following:

- the share of infrastructure facilities located outside areas of natural value;
- the share of new projects that have undergone biodiversity impact assessment (EIA);
- monitoring and prevention of incidents and penalties related to negative impacts on protected areas, biological species, and habitats;
- disclosure of information in the Company’s reporting in accordance with TNFD recommendations.

8. Monitoring and accountability

Information on biodiversity is disclosed in the annual sustainability report in accordance with the GRI 101 and TNFD standards.

The monitoring results of this Policy are used to assess regulatory and environmental risks and to improve environmental protection programs within the environmental management system aligned with ISO 14001 requirements.

9. Responsibility

The implementation of this Policy is carried out by the following structural divisions:

1. The Department for Transformation and Strategic Development collects data on biodiversity and ecosystem indicators from the relevant divisions and discloses such information in the annual sustainability report in accordance with GRI 101 and TNFD standards;
2. Responsibility for ensuring the implementation of KPI indicators in accordance with the approved ESG Strategy is assigned to the following structural divisions:

- Prospective Development and Investment Projects Department;
- Capital Construction Department;
- IT and Telecommunications Department;
- Facility Management Department;
- TMS Hub branch.

The Company considers biodiversity conservation as a strategic objective directly linked to business sustainability, public well-being, and the fulfillment of international environmental commitments.

This Policy is mandatory for all structural divisions of the Company and shall be regularly reviewed in accordance with changes in legislation and sustainable development standards.

This Policy shall be approved by an order of the Chairman of the board of the Company and shall enter into force from the date of its approval. Amendments and additions to the Policy shall be made in accordance with the established procedures of the Company, taking into account changes in legal requirements, international standards, and the Company's internal regulatory documents. The cancellation of this Policy shall be carried out by an order of the Chairman of the board of the Company.