



Environmental, Social and Governance Report 2025

Tencent 腾讯

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About Tencent

Tencent is a leading global Internet technology company dedicated to creating innovative products and services to enrich the lives of people.

Our communication and social platforms serve over one billion users worldwide, enabling them to stay connected with friends and families while enjoying easy access to life services such as entertainment, transportation and payments.

We develop and publish some of the world's most popular online games and premium digital content, delivering engaging and interactive experiences for a broad and diverse user base.

We provide enterprise services, including marketing, cloud services and computing, and FinTech services, to support the digital transformation and business expansion of our partners.

Tencent was founded in 1998 and has been listed on the Main Board of the Hong Kong Stock Exchange since 2004.

Value for Users, Tech for Good

Creating value for our users and harnessing technology for good are at the core of Tencent's vision and mission.

This belief is deeply embedded in our product development, daily operations and corporate governance, driving the sustainable growth of our Company while guiding our engagement with broader society to create sustainable social value.



Executive Summary

Tencent executes our Environmental, Social and Governance strategy through proactive risk identification and management, while integrating sustainable social value creation into our operations and product development. In 2025, we made significant progress in the following areas:

Environment

- Driven by enhanced energy efficiency, accelerated transition to green electricity, and supply chain decarbonisation, we stay firmly on course to meet our carbon targets. Year-over-year, we enhanced the PUE performance of owned data centres from 1.257 to 1.246. The share of green electricity consumption increased from 49.8% to 82.9% in owned data centres and from 3.8% to 21.4% in leased data centres. These initiatives enabled us to maintain our decarbonisation progress despite rising AI-related power demand, with carbon intensity in 2025 reduced by 24.4% against the 2021 base year.
- With the application of AI in species identification, we enabled field researchers to improve the efficiency and accuracy of data collection while facilitating public participation in urban ecological observation. These efforts were recognised as one of the 2025 Exemplary Cases for Business Biodiversity Conservation by the Centre for Environmental Education and Communications of China's Ministry of Ecology and Environment.

Social

- We are committed to advancing technological inclusivity. Beyond physical accessibility, we expanded our scope to cognitive health with our new, clinically validated training software. Within the *Nearby Jobs* Mini Program, we have introduced a dedicated section for people with disabilities, integrating approximately 3,000 job openings certified by China Disabled Persons' Federation Employment Service Platform.
- We supported social innovation and philanthropic initiatives to advance the United Nations Sustainable Development Goals. The Xplorer Prize and the New Cornerstone Investigator Program have provided long-term and stable funding to over 430 outstanding scientists. In 2025, our annual Giving for Good initiative generated 530 million engagements in philanthropic activities.

Governance

- We formalised our commitment to Responsible AI principles, which are anchored in our Tech for Good mission and govern the ethical development and deployment of AI across our businesses and operations. Tencent Cloud obtained additional security certifications in key markets and attained ISO 42001 AI management systems certification. We further strengthened privacy governance by establishing a group-level Personal Information Protection Committee.
- In business ethics, our anti-fraud and compliance management systems received international and Chinese certifications. We joined the Sustainable Value Chain Leaders Alliance initiated by the United Nations Global Compact and launched ESG training course on our supplier portal.



Building on these efforts, our ESG performance earned widespread recognition from stakeholders. Tencent was featured in the "2025 Shenzhen ESG Practice Pioneer: Exemplary Enterprise Cases", and named to Fortune Magazine's list of the "World's Most Admired Companies". Furthermore, Tencent maintains its inclusion in multiple global ESG indices, and in October 2025, our MSCI ESG Rating was upgraded from BBB to A.

James Mitchell John Lo
Co-Chairs
ESG Working Group

ESG Governance

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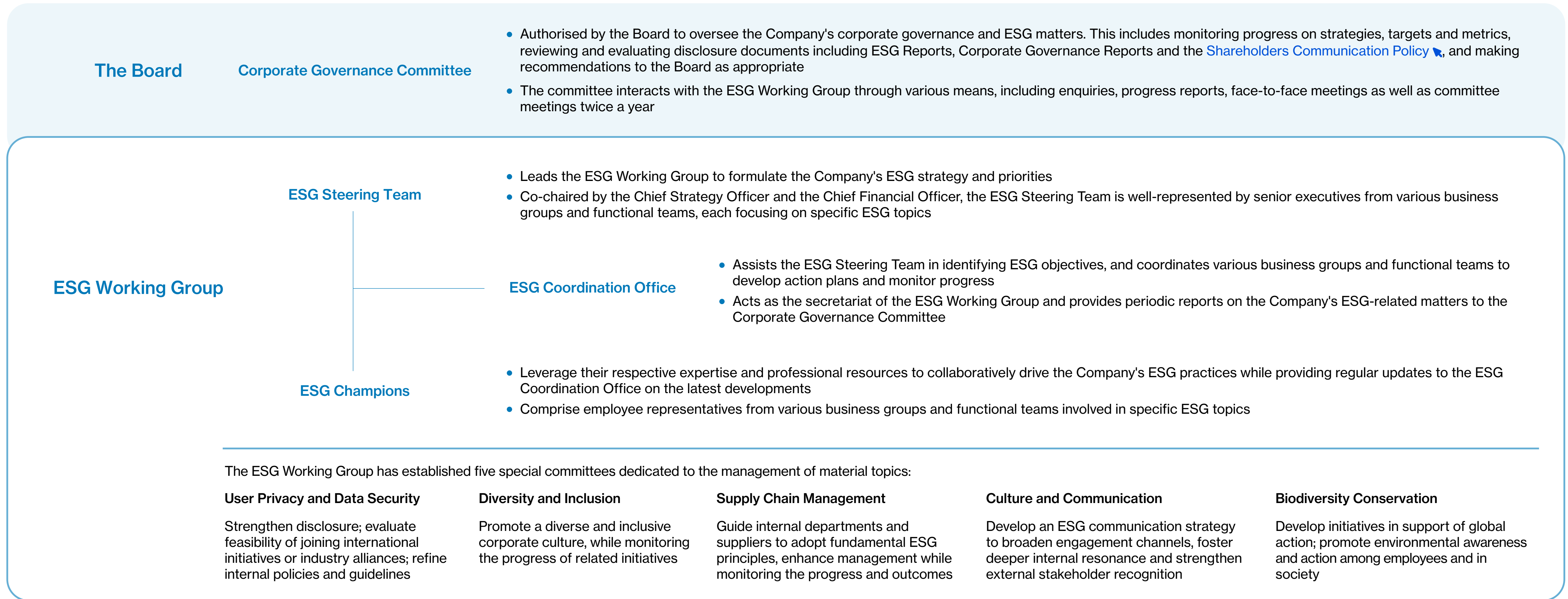


Chapter 1

1.1

ESG Governance Structure

The Company's governance framework for environmental, social and governance ("ESG") matters operates at three interconnected tiers: the Company's board of directors (the "Board") provides strategic oversight, senior management drives the development of the ESG strategy and the execution of ESG priorities, and ESG Champions across various business groups ensure implementation and report regularly on the progress.



1.2

Board Statement

The Board retains overall responsibility for the Company's ESG strategy and reporting, delegating oversight to the Corporate Governance Committee. Supported by the ESG Working Group, the committee tracks the progress and performance of ESG matters through regular updates, special reports, meetings and enquiries, covering areas including but not limited to, carbon neutrality action plan, sustainable social value innovation initiatives, progress of diversity and inclusion, and global ESG trends.

The Company has solicited views and recommendations from the Board and its key stakeholders in assessing the materiality and priority of ESG topics with potential significant influence on its sustainable development. The Company has also incorporated key ESG risks into its corporate risk assessment and management system, and formulates risk response measures by considering the possibility, impact, and trends of these risks. The Board and the Corporate Governance Committee regularly review those risks and recommend mitigation measures.

This report has obtained limited assurance from a professional third-party organisation, and was reviewed by the Corporate Governance Committee and the Audit Committee and approved by the Board.



1.3

ESG Strategy

Rooted in our vision and mission of **Value for Users, Tech for Good**, our ESG strategy is closely aligned with the Company's business strategy, which prioritises users, industries, and society. Guided by leadership and embraced by employees, our commitment to ESG has become a core element of our corporate culture and serves as a driving force for the Company's sustainable development.

We implement ESG management through three approaches: (i) establishing an ESG governance structure that includes the Board, management, and employees; (ii) integrating ESG principles into corporate culture and ESG practices into daily business operations; and (iii) publishing an ESG report aligned with international reporting standards annually to enhance transparency and communicate the Company's actions and performance in ESG to our stakeholders.

With the rapid advancement of artificial intelligence alongside the convergence of digital and real economies, the Internet industry encounters new market opportunities and risks. We are committed to creating products that generate value for users and business partners, while proactively managing related risks. We put Tech for Good into practice, leveraging technologies to address environmental and social pain points, thereby advancing the **United Nations Sustainable Development Goals** ("SDGs"). Our ESG strategy is implemented internally through robust corporate governance, ethical business practices, and advanced human capital development. Externally, we pursue sustainable business growth that prioritises the balanced interests of our stakeholders and the environment. Our efforts can be summarised as follows:



Business Operations

- Adhere to applicable laws and regulations and uphold ethical business standards;
- Provide our employees with a diverse, inclusive, and safe work environment; safeguard their rights and well-being, and support their professional growth;
- Ensure the effectiveness of our corporate governance, and integrate ESG into our risk management and controls, to protect the rights of shareholders and stakeholders.



Users

- Protect the privacy of users, and the security of their data and digital properties;
- Listen to feedback from users and actively respond to their needs, enquiries, and complaints, based on which we iterate our product designs and enhance our service quality;
- Provide minors with a safe online environment and support underserved users with inclusive access to digital economy.



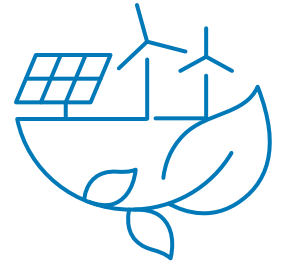
Business Partners

- Assist industries in their digital and intelligent upgrade, provide additional support to Micro-, Small and Medium-sized Enterprises ("MSMEs");
- Ensure fair and equitable treatment to our business partners, solicit and respond to their feedback, thereby honing cooperation processes and business practices;
- Implement rigorous risk control measures to prevent and combat illegal and unwarranted conduct, and collaborate with value chain partners to maintain a fair and transparent business environment conducive to the long-term steady growth of the industry.



Industry and Society

- Strengthen our technical foundation through proprietary innovation and industry collaboration, and participate in the development of an open, win-win ecosystem;
- Increase community investment and leverage our products, platforms and technologies to implement Tech for Good, bringing the benefits of technological advancements to wider communities;
- Leverage our digitalisation capabilities to assist philanthropic organisations to broaden reach to potential donors, enhance operational efficiency, and increase transparency and public trust.



Environment

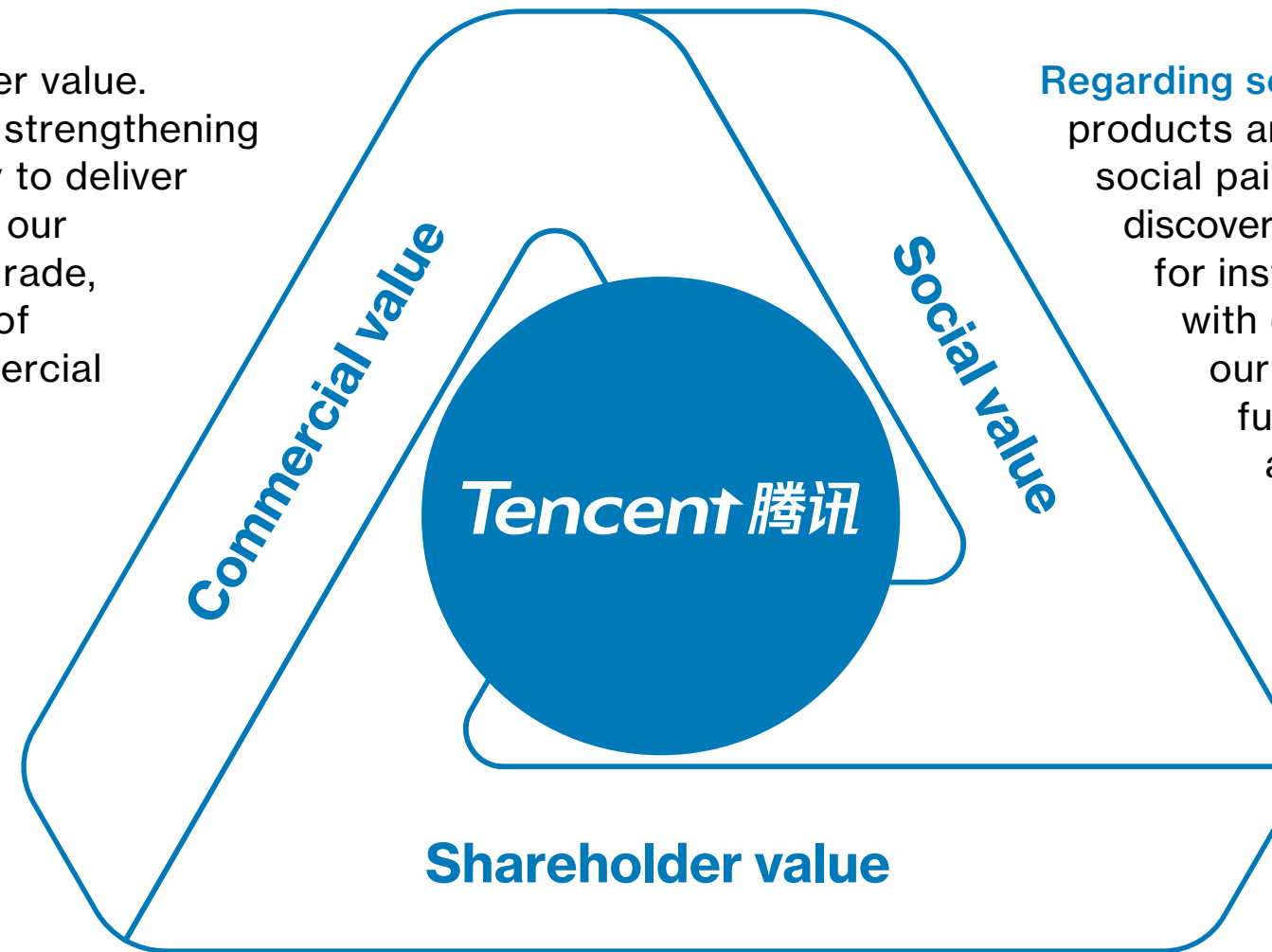
- Advance our own carbon neutrality goals, and assist the transition to low-carbon society through investments in low-carbon technology startups;
- Minimise our operational dependence and impact on natural resources while applying digital technologies to advance biodiversity conservation;
- Utilise digital tools and products to raise public environmental awareness and encourage behavioural change.

1.4

Commercial Value, Social Value, and Shareholder Value

Tencent places user value at the core of our mission and culture, and at the forefront of commercial design for our products and services. Our investment in social value innovations, which was funded by investment gains and may take time to produce scalable outcomes, was separate from the resources we allocated to research and development for our products, technologies and platforms that are crucial for user value creation, and ultimately shareholder return. We proactively manage the balance between commercial value, social value and shareholder value, ensuring the Company can steadfastly attain sustainable development in the long run.

In designing commercial value, we focus on user value. We invest heavily in technologies and products, strengthening the protection of user privacy and data security to deliver superior and innovative product experiences to our users. By assisting industries in their digital upgrade, we create social value together for the benefit of society. This, in turn, enables us to share commercial benefits brought by the convergence of digital and real economies. We position ourselves as a trusted digital assistant facilitating innovation, entrepreneurship and upgrade of industries.



Regarding social value innovation, we focus on deploying our products and technologies to find innovative pathways to solve social pain points. We encourage our business teams to discover and enhance the social value of our products by, for instance, enhancing digital accessibility for communities with disabilities, protecting biodiversity, and more. Led by our Sustainable Social Value Organisation, we provide funding support for researchers in basic sciences and, in certain core areas, partner with recognised philanthropic organisations to incubate projects that can bring scalable benefits to society.

On shareholder value, our continuous focus on creating user value and the organic integration of social and commercial values strengthens our foundation in sustainability, thus safeguarding the long-term value of the Company. We are committed to maintaining a high standard of corporate governance and have integrated environmental and social factors into our corporate strategies and risk management.

1.5

ESG Materiality Assessment

We incorporate stakeholder perspectives and suggestions into our evaluation of ESG risks and opportunities. We regularly engage with stakeholders through various channels to understand their expectations, concerns, and information needs.

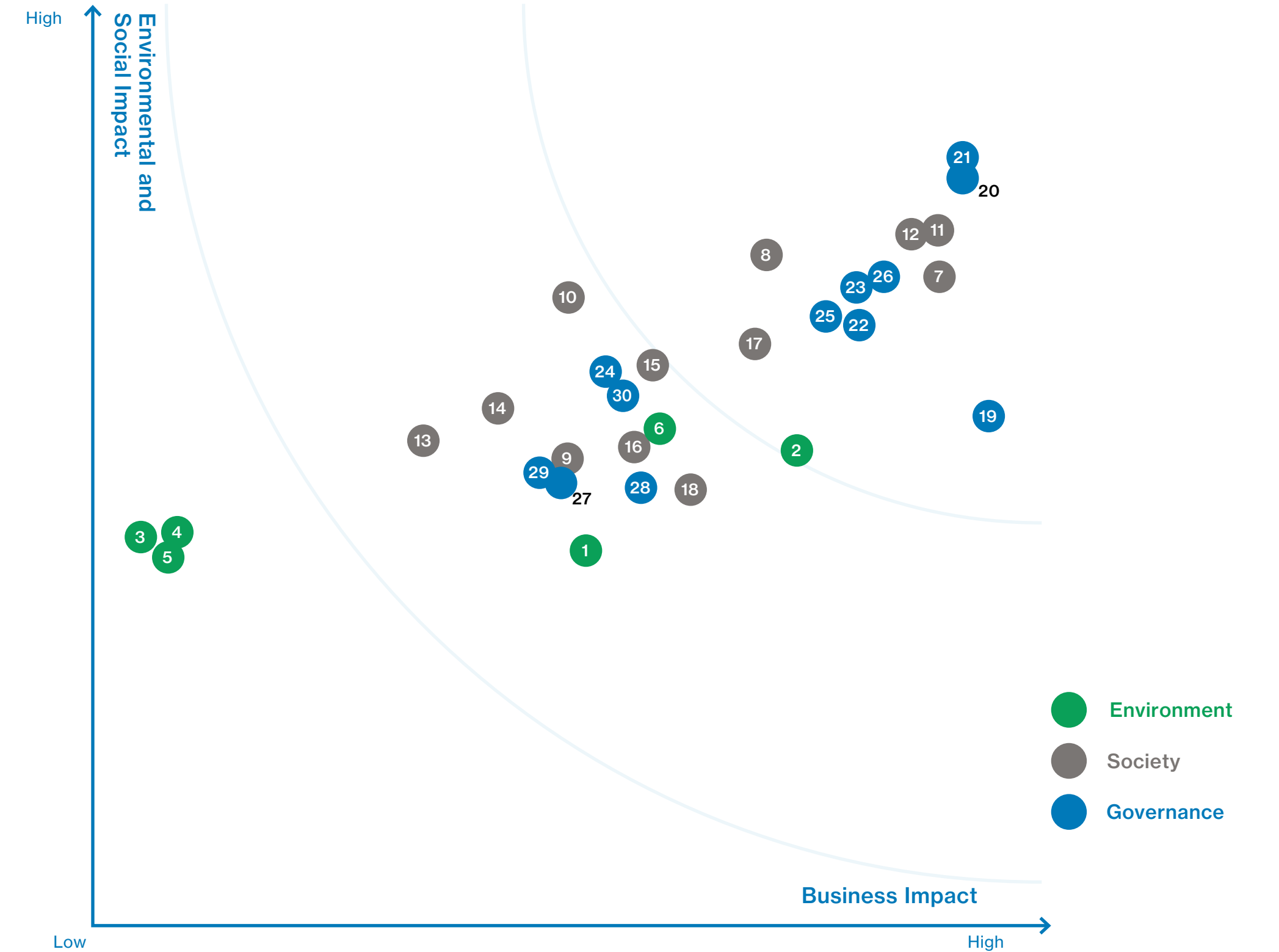
We commissioned third-party professional firms to conduct a comprehensive ESG materiality assessment. The assessment followed a structured process to identify and prioritise the topics most significant to our business and our stakeholders.



The key steps are as follows:

- Identify the universe of ESG topics relevant to the Company, based on:
 - Tencent's corporate strategy and core businesses.
 - The Environmental, Social and Governance Reporting Code set out in Appendix C2 of the Main Board Listing Rules of The Stock Exchange of Hong Kong Limited ("HKEX ESG Reporting Code") and major international ESG reporting standards and frameworks, including International Financial Reporting Standards ("IFRS") S1 and S2, the Task Force on Climate-related Financial Disclosures ("TCFD"), the Taskforce on Nature-related Financial Disclosures ("TNFD"), the Global Reporting Initiative ("GRI") Standards, and the Sustainability Accounting Standards Board ("SASB") Standards, Ten Principles of the UN Global Compact ("UNGC"), as well as the SDGs.
 - Sustainable development trends and stakeholder expectations.
- Collect stakeholder views on the materiality of ESG topics through interviews and online surveys. Interviews were conducted with directors, senior management and investors to gain in-depth understanding of their prioritisation of ESG topics, as well as their perspectives and recommendations on our ESG strategy. Online surveys covered employees, users, business and supply chain partners, regulatory bodies, academia, media and communities, with more than 3,200 valid responses received. The data collection process took into consideration stakeholder coverage and sample size to ensure the reliability and representativeness of the assessment results. Following the publication of the ESG report, we gathered feedback on our ESG disclosures and materiality assessment through online channels and face-to-face engagement, including meetings with stewardship teams.
- Develop a materiality matrix to illustrate the business impact, as well as the social and environmental impact of ESG topics. Consistent methodologies have been applied throughout the assessment process to ensure the comparability and reliability of data and conclusions across reporting periods.

2025 ESG Materiality Matrix



- | | | |
|-----------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| 1 Climate Change and Carbon Neutrality | 11 Responsible Content and Platforms | 21 Protection of Data and Cyber Security |
| 2 Energy Management | 12 Build a Safe and Healthy Online Environment for Minors | 22 Responsible AI |
| 3 Water Management | 13 Provide Digital Solutions for the Silver Generation | 23 Anti-corruption |
| 4 Waste Management and Circular Economy | 14 Provide Accessible and Assistive Digital Products for People with Disabilities | 24 Anti-monopoly |
| 5 Biodiversity Loss and Nature Conservation | 15 Support the Digital Upgrade of the Real Economy | 25 Anti-money Laundering |
| 6 Digital Solutions to Support Environmental Education and Protection | 16 Digital Technologies Promoting Financial Inclusion | 26 Protection of Intellectual Property Rights |
| 7 Talent Attraction, Development and Retention | 17 Service Quality and Customer Feedback | 27 Integrate ESG Factors into Corporate Strategies and Balanced Scorecard Review |
| 8 Employee Compensation and Well-being | 18 Executing Tech for Good to Support the Advancement of the SDGs | 28 Incorporate ESG Value into Corporate Culture |
| 9 Diversity and Inclusion | 19 Corporate Governance (Effectiveness, Independence, Diversity) | 29 Sustainable Supply Chain Management |
| 10 Labour Rights | 20 Protection of Data Privacy | 30 Stakeholder Dialogue and Engagement |

1.6

Annual Review of ESG Working Group

The ESG Working Group is dedicated to enhancing the Company's ESG performance and fostering a robust ESG culture. Corporate culture is fundamental to the implementation of our ESG strategy, inspiring employees to embody ESG principles in their daily work. To this end, we hold monthly ESG quiz competitions to reinforce employees' understanding of material topics. We also host an annual ESG Culture Week, featuring seminars with internal and external experts to share industry insights and global ESG trends. In 2025, our thematic initiatives included:



Business Ethics

We held nine outreach activities focused on business ethics, strengthening employees' compliance awareness and commitment to business integrity through in-person activities.

Privacy Protection and Data Security

We reinforced privacy protection principles by sharing compliance requirements and best practices. We conducted 38 specialised privacy training sessions to ensure compliance standards are understood at all levels of the organisation.

AI Safety and Governance

We collaborated with academic institutions on research initiatives to explore the opportunities and challenges that AI presents across various ESG domains. We also hosted online seminars to share insights on ESG theories and governance best practices, enhancing employee awareness of AI safety.

Environmental Protection

During Earth Day and World Environment Day, we organised educational campaigns and encouraged employees to log green actions, such as carbon reduction, energy and water conservation, waste reduction, and ecological preservation, via our *Nature Positive* Mini Program.

Diversity and Inclusion

We hosted an inaugural global forum covering five core themes: cross-cultural communication, women's career development, age-friendly product development, care for children with autism, and employment for people with disabilities. These sessions aimed to foster mutual respect and a deeper understanding of diversity and inclusion.

Philanthropy

Through the *Act for Good* Mini Program, employees can apply their personal skills and knowledge to participate in or initiate philanthropic projects. Over 41,600 volunteers had participated in 2,969 projects by the end of 2025.

Users

- Our ESG materiality assessment results indicated that the five topics most recognised by users are talent attraction, development and retention; digital solutions to support environmental education and protection; employee compensation and well-being; protection of data and cyber security; and protection of data privacy

Employees

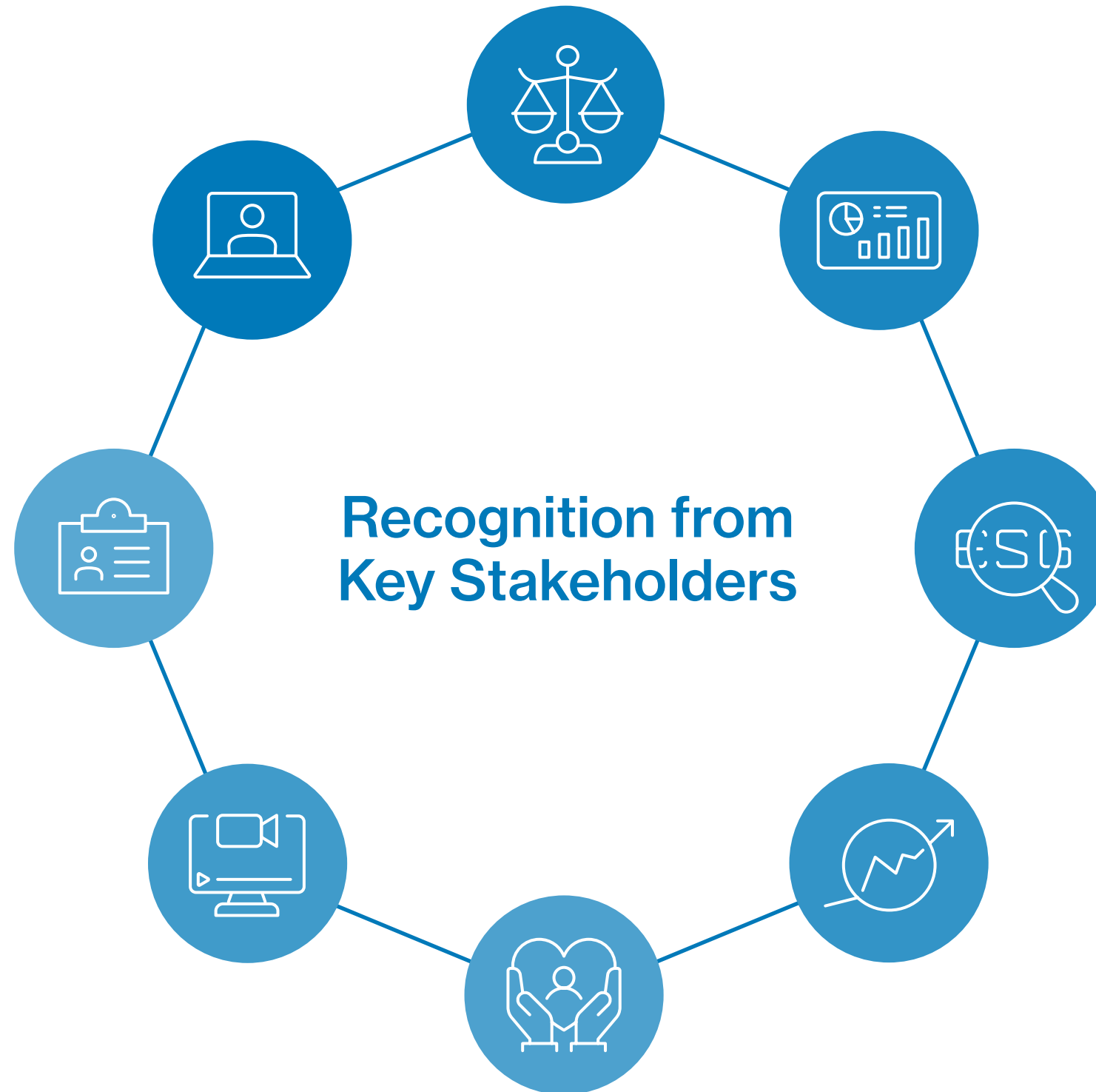
- Our ESG materiality assessment results indicated that the five topics most recognised by employees are build a safe and healthy online environment for minors; talent attraction, development and retention; protection of data privacy; digital solutions to support environmental education and protection; and support the digital upgrade of the real economy

Media

- TIME – 2025 World's Most Sustainable Companies
- Forbes China – 2025 China ESG Top 50
- Forbes – 2025 World's Best Employers
- China Media Group – 2025 China ESG Listed Company Pioneer 100
- Sina Finance – 2025 China ESG Top 100
- Fortune – 2026 Most Admired Companies

Governments and Regulators

- Listed in 2025 Enterprise ESG Cases by the Centre for Environmental Education and Communications of the Ministry of Ecology and Environment
- Listed in 2025 Shenzhen ESG Practice Pioneer Enterprise Cases by the Development and Reform Commission of Shenzhen Municipality
- Privacy-Friendly Awards 2025, including the Gold Award and the Best Data Breach Response Plan Award, from the Office of the Privacy Commissioner for Personal Data, Hong Kong



Non-profit and Professional Organisations

- Listed among the 25 Sustainable Value Chain Leaders Alliance Corporate Practice Case Collection by the UNGC
- Hong Kong Institute of Certified Public Accountants, Special Mention in the Large Market Capitalisation Category of the Best Corporate Governance and ESG Awards 2025
- The Hong Kong Management Association, Best Annual Reports Awards-Best Environmental, Social and Governance Reporting Award 2025 (Technology & Information)

Investors

- Extel (formerly Institutional Investor) ranked Tencent No. 1 for Best ESG in the Internet sector (Asia ex-Japan) for five consecutive years, from 2021 to 2025. The ranking is based on a survey of more than 6,000 investment professionals from over 1,300 financial services institutions globally. In 2025, Tencent was also named the Most Honoured Company by Extel

ESG Rating

- S&P Global raised Tencent's ESG score to 61¹
- MSCI upgraded Tencent's ESG rating from BBB to A²

ESG Indices

- MSCI Emerging Markets ESG Leaders Index and MSCI China ESG Leaders Index since 2013
- S&P Global Dow Jones Sustainability World Index and Sustainability Emerging Markets Index since 2023
- Hang Seng ESG 50 Index and Hang Seng Corporate Sustainability Benchmark Index since 2024

1. According to the S&P Global ESG Score released on 13 November 2025.
2. According to the MSCI ESG Rating Report released on 21 October 2025.

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UNGC Anti-Corruption Principles

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

2.1

Board Governance, Independence and Diversity

Tencent has a unitary board. As of 31 December 2025, the Board consisted of eight directors, including an executive director, two non-executive directors ("NEDs") and five independent non-executive directors ("INEDs").

The Board plays a pivotal role in steering Tencent's strategic direction, overseeing corporate governance, and ensuring the Company's long-term sustainable growth. It operates through a well-defined governance structure, and delegates matters requiring dedicated time, attention, and expertise to its various committees. The Board has established five committees, each with its own terms of reference outlining the duties and responsibilities of the committee members. In 2025, Professor Ke Yang was appointed to the Nomination Committee, bringing the total number of members to six. Her appointment introduces a more diversified perspective into the committee's talent selection and evaluation processes. For more details on our corporate governance efforts, please refer to the *Corporate Governance Report* in Tencent 2025 Annual Report.

The diverse experience and background of Board members are highly valued, and the advice and oversight provided by the NEDs and INEDs are fully recognised. In 2025, INEDs accounted for 62.5% of the Board, with NEDs accounting for 25.0%.

- The NEDs are senior management from the Naspers Group, a long-term shareholder investing in Tencent through its subsidiary, Prosus. Naspers is a global consumer Internet group and one of the largest technology investors in the world. The NEDs bring global perspectives and expertise in business, finance and management, performing their supervisory duties in reflection of shareholders' long-term interests.
- The INEDs are professionals from a wide range of backgrounds, possessing diverse expertise and broad management experience. They provide checks and balances that safeguard the interests of the shareholders, the Company, and other stakeholders. The Nomination Committee regularly assesses the independence of the INEDs and determines them to be independent. The Company, in undertaking this assessment, has considered the independence guidelines set out under the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the "Hong Kong Listing Rules"), along with the tenure of service of each INED and the unique perspective, skill and experience each contributes to the Board. The Company has received the annual independence confirmation from all INEDs, including three who have served for more than nine years, and the Board has affirmed their independence. The Nomination Committee and the Board, after careful assessment, are of the view that they possess the independence necessary to fulfil their roles as INEDs effectively and will continue to bring valuable experience, knowledge and professionalism to the Board.

The Board collectively brings profound professional expertise across a wide range of sectors, including computer and information technology, telecommunications, business administration, financial management, accounting, law, medicine, and social sciences. For more details on our directors' prior experiences, please refer to the *Directors' Report* in Tencent 2025 Annual Report. The Board maintains a good mix of director tenure lengths to embrace various perspectives and experience from seasoned directors and those appointed in recent years, while ensuring the effectiveness and efficiency in fulfilling their fiduciary duties.

In the process of nominating and selecting directors, the Board adheres to the Board Diversity Policy and the Board Nomination Policy, comprehensively evaluating candidates against a set of diverse factors, including knowledge, professional background, experience, gender, and cultural and educational background, having due regard to the benefits of Board diversity, while ensuring adherence to the relevant requirements of the Hong Kong Listing Rules. In terms of gender diversity, a target was set in 2022 to raise the female representation on the Board to 30.0% by 2030. By the end of 2025, the female representation on the Board was 25.0%.

2.2

Risk Management

Appropriate and effective risk management and internal control systems are fundamental to safeguarding our strategic objectives. The Board retains ultimate responsibility for these systems and delegates oversight responsibility to the Audit Committee. The committee members oversee the implementation of the risk management and internal control systems quarterly, and conduct an annual review of their effectiveness. The Audit Committee also ensures that ESG-related factors, including but not limited to climate change, are integrated into the Company's risk assessment and internal control management process, and material risks are identified and managed. The Audit Committee members have extensive experience and knowledge in financial management and risk management. Through regular updates and training, they remain well-informed on the latest requirements and industry best practices for risk management and internal control, which are discussed as needed during the committee meetings.

We provide regular training to employees through various channels, such as on-site training, online courses, and in-person interactive activities, covering risk management systems, key risk analysis, and internal controls. The training enhances their awareness of, and capabilities in, risk management, thereby strengthening our internal control environment. We also embed risk management and internal control performance into appraisals to ensure accountability.

Please refer to the *Corporate Governance Report* in *Tencent 2025 Annual Report* for a detailed discussion on our significant risks and response measures.

Risk Management Process

Risk Identification

Business and functional departments of each business group identify, assess, and respond to risks in the course of business operation, including those arising during product and service development, in a bottom-up manner.

Risk Evaluation and Management

The risk management and internal control department (the "Internal Control Department") systematically collects, consolidates, and analyses business information to identify and compile a list of significant risks at both the corporate and business levels annually. It ensures appropriate response strategies and control measures are developed and implemented to address these risks. The identified risks, along with the corresponding response and control measures, undergo review by management and the Audit Committee before being reported to the Board.

Risk Monitoring

The Internal Control Department analyses and evaluates responses to significant risks regularly. To ensure the effectiveness of risk management and internal controls, the Internal Audit Department conducts annual risk-prioritised audits across critical business units on a rotational basis, identifying control gaps in a timely manner and providing actionable recommendations. Both departments report findings to the Audit Committee quarterly. The Company also engages external auditors annually to conduct independent assessment and validate the effectiveness of these practices.

Risk Appetite and Response Strategy

The Board is responsible for evaluating and determining the nature and extent of the significant risks the Company is willing to assume in pursuing its strategic objectives. On behalf of the Board, the Audit Committee assesses the nature of risks, determines the Company's risk tolerance to achieve its business objectives, and establishes risk ratings to prioritise mitigation efforts. Based on the assessment outcomes, the Audit Committee formulates appropriate response strategies, assigns ownership of significant risks, and guides the Company's management in implementing an effective risk management system, with support from the Internal Control Department. The Audit Committee considers that management has taken appropriate measures to address and manage the significant risks within acceptable levels.

2.3

Business Ethics

Business ethics underpins all our decisions and actions, essential to maintaining the trust of our customers. Guided by integrity, fairness, and transparency, we engage responsibly with our business partners to foster a fair and transparent business environment. To translate these principles into practice, Tencent employees are required to adhere to the Tencent Sunshine Code of Conduct ("Sunshine Code of Conduct") and participate in training designed to raise their ethical awareness and capabilities to make sound and responsible judgements in their daily work.

Tax Policy

Tencent's tax policy is grounded in the principles of integrity and transparency. We implement a robust tax strategy, supported by effective internal risk management and control systems, and ensure compliance with applicable tax laws and regulations in the jurisdictions where we operate. For more detailed tax information, please refer to the financial statements in Tencent 2025 Annual Report and our [Group Tax Strategy](#).

Adherence to Integrity Practice

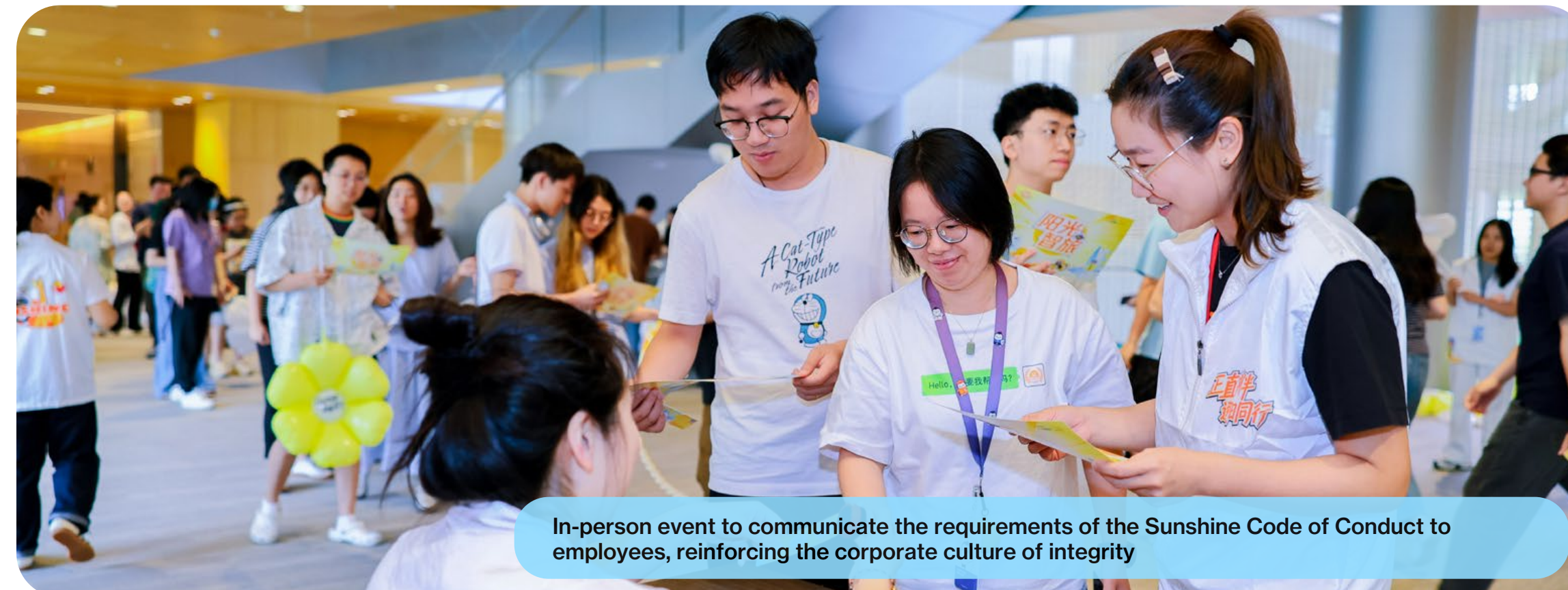
We foster a corporate culture of integrity with zero tolerance for corruption and other fraudulent behaviours, while cultivating a high level of employee awareness through continuous training. By providing case studies and examples of acceptable behaviours, our training is designed to enhance employees' understanding of business ethics and fraud risks. Our workforce, from permanent employees to interns and workers of contractors, is mandated to complete the annual training on the Sunshine Code of Conduct and acknowledge their understanding and acceptance of the Sunshine Code of Conduct upon completion. In addition, we organise additional trainings on anti-fraud for managers, employees holding sensitive positions and new hires.

The Board delegates its oversight of business ethics to the Audit Committee. The Chief Executive Officer and relevant senior management executives contribute to this oversight through company-level Internal Audit Committee meetings. During the Audit Committee and Internal Audit Committee meetings, the directors and senior management executives are briefed on the latest anti-fraud regulatory requirements and trends, review policies related to anti-fraud and conduct business ethics risk assessments.

We have established the Sunshine Code of Conduct and other policies, supplemented by operational guidelines, to prevent and address violations, including fraud, corruption, commercial bribery, facilitation payments, conflicts of interest, and insider dealings. The code of conduct applies globally to all permanent employees, consultants, interns and workers of contractors and specifies the following:

- Definition of violations and prohibited behaviours;
- Classification and handling of violations, detailing the impact of violations on performance assessments, and disciplinary actions for responsible managers, including demotion, dismissal, or termination of labour contract;
- Investigations and procedures for handling reported violations.

For sensitive positions such as procurement, marketing, and sales, our Sensitive Position Management Policy outlines additional internal control measures, for example, regular job rotation and audit.



In-person event to communicate the requirements of the Sunshine Code of Conduct to employees, reinforcing the corporate culture of integrity

Our anti-fraud policies are reviewed annually and revisions are made in response to changes in applicable laws, regulations, ISO standards and industry practices. We abide by applicable anti-fraud laws and regulations in the jurisdictions where we operate, including but not limited to the Criminal Law of the People's Republic of China, the Anti-Unfair Competition Law of the People's Republic of China, and Hong Kong's Prevention of Bribery Ordinance. In 2025, we obtained certifications for GB/T 35770-2022 Compliance management systems – Requirements with guidance for use, ISO 37001 Anti-bribery management systems, and ISO 37301 Compliance management systems, marking authoritative recognition of our anti-fraud management capabilities to global standards.

We identify fraud clues through proactive screenings and whistleblowing reports from both internal and external sources. These leads are independently investigated by the highly autonomous Anti-Fraud Investigation Department which reports directly to the Audit Committee of the Board and the Internal Audit Committee of the Company on a quarterly basis. The Internal Audit Committee reviews and approves all disciplinary actions and related decisions. We also leverage AI and big data analytics to develop a dynamic risk model that spans across business partner onboarding, project bidding, contract delivery, and reimbursements. This model enables us to detect potential risks at an earlier stage and strengthen our internal controls.

Our Anti-Fraud Whistleblowing System provides multiple 24/7 reporting channels, including a dedicated email address, postal box, hotline, and *Tencent Sunshine Official Account*, available to all employees, suppliers, business partners, and other stakeholders. We accept anonymous reports and handle all whistleblower information with strict confidentiality under a non-retaliation policy that prohibits any form of retaliation. Employees may seek clarifications on our anti-fraud policies through dedicated channels, including *WeCom Official Account*, an internal hotline, and a dedicated email address. In 2025, we received approximately 1,800 enquiries.

We publish the Tencent Anti-Fraud Announcement annually to disclose the outcome of our anti-fraud efforts. In 2025, the Anti-Fraud Investigation Department investigated over 70 cases of Tencent's Red Line violations, resulting in the dismissal of more than 90 individuals. Furthermore, during the reporting period, we received litigation outcomes for eight corruption-related cases where employees had been handed over to the relevant government authorities in accordance with the law (including employees handed over in previous years).

We have joined the Business Sector Integrity Charter, initiated by the Independent Commission Against Corruption of Hong Kong ("Hong Kong ICAC"), demonstrating our commitment to ethical conduct. We also participated in the Coding4Integrity Asian Youth Anti-Corruption Hackathon 2025, co-hosted by the United Nations Office on Drugs and Crime, the Hong Kong ICAC, and the International Association of Anti-Corruption Authorities. During the event, our representatives shared insights into how we leveraged AI in auditing to strengthen risk management and fraud detection capabilities, and also served as mentors and judges, offering professional guidance to participants as they developed innovative solutions for integrity challenges.

Procedures for handling anti-fraud investigations



Anti-Money Laundering Management

Tencent adopts a risk-based management approach to anti-money laundering, continuously refining our anti-money laundering governance framework to address evolving risks and environments.

We dynamically benchmark against global anti-money laundering regulatory requirements, and regularly update and refine relevant policies and management processes, to ensure compliance with applicable laws and regulations in the jurisdictions where we operate, including but not limited to the Anti-Money Laundering Law of the People's Republic of China. We implement the Tencent Group Anti-Money Laundering and Sanctions Compliance Minimum Standard, and have published the [Tencent Anti-Money Laundering Policy Statement](#) and the [Tencent Sanctions Policy Statement](#), available on our website. Additionally, each of Tencent's licenced financial institutions independently revises its relevant policies in response to business developments and regulatory requirements.

Our money laundering and sanctions management structure comprises:

- **The Anti-Money Laundering and Sanctions Committee:** provides guidance and oversight on anti-money laundering and sanctions compliance efforts, including the review and approval of the formulation of relevant strategies, policies, processes, as well as other significant compliance matters.



- **The Anti-Money Laundering and Sanctions Compliance Department:** coordinates the management of risks across different regions and business groups, such as ensuring existing mechanisms comply with applicable laws and regulations and overseeing the implementation of various measures.
- **Licensed financial institutions:** promote, implement, and oversee anti-money laundering and sanctions compliance action plans within their respective institutions, ensuring effective control of relevant risks across business operations.

We monitor trends in money laundering risks and regulatory developments in anti-money laundering and conduct gap analyses, based on which we provide employee training, and enhance anti-money laundering management tools and methodologies, to improve the efficiency and effectiveness of compliance management. In 2025, we enhanced our risk management capabilities and compliance awareness and skills through the following initiatives:

- Adjusted our overall assessment system based on different risk categories, such as money laundering, terrorist financing, and proliferation financing, in line with the latest regulatory requirements. We also built a risk monitoring model and leveraged technologies, such as AI and big data, to enhance our capability to identify, monitor, analyse, and respond to risks. For non-financial sectors such as virtual assets, online games, and live-streaming, we examine sector-specific money laundering patterns and conduct targeted risk assessments to address emerging money laundering risks arising from these business models.
- Conducted 54 training sessions and awareness campaigns, covering regulation interpretation, internal control policies, developments in anti-money laundering compliance, global trends, case studies on sanctions, and emerging risk management approaches.

Adherence to the Principle of Fair Competition

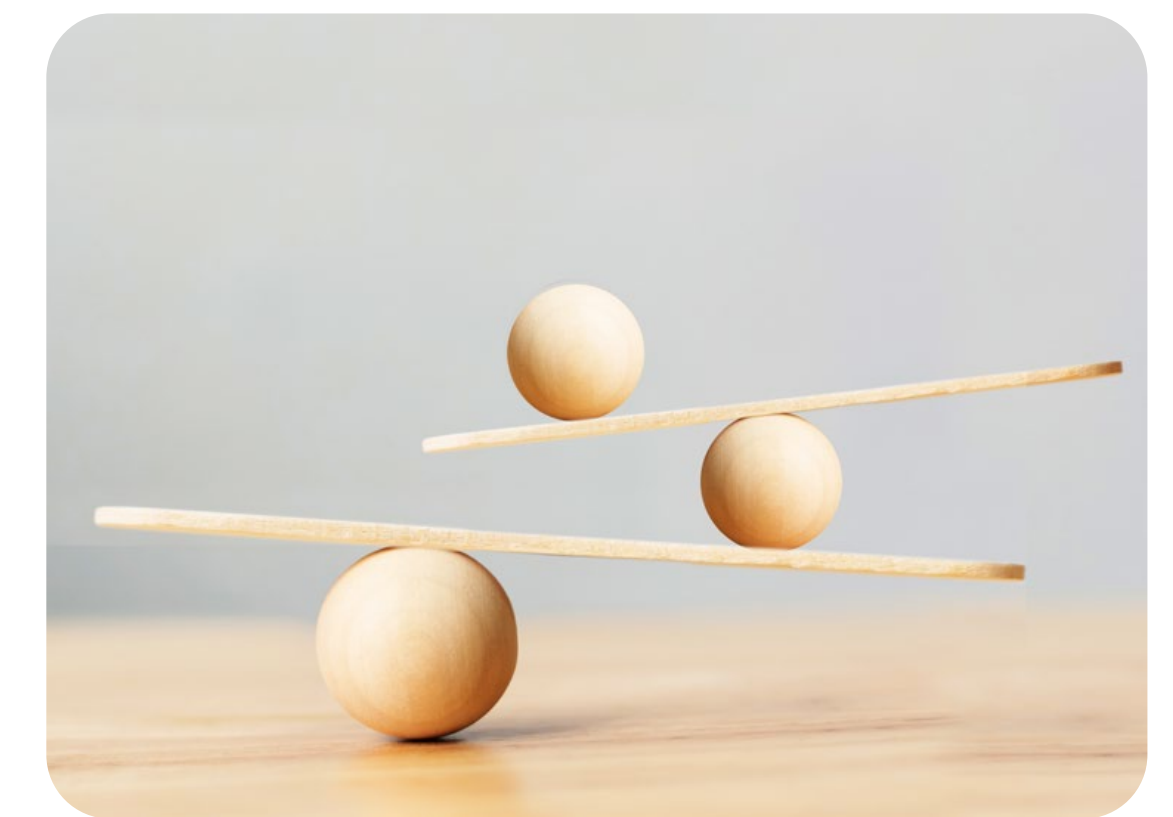
Tencent continuously enhances its compliance management and collaborates with market participants to maintain a fair and competitive business environment.

We foster an anti-monopoly culture and embed it into our corporate culture. In 2025, we conducted 10 training sessions for key personnel, including managers, sales, and staff from marketing, product operations, and legal departments, strengthening their compliance capabilities. We also incorporated online courses into new hires' onboarding, enabling them to acquire an early awareness and understanding of the relevant policies and management requirements.

In the course of business development, we comply with applicable laws and regulations related to anti-monopoly and fair competition in the jurisdictions where we operate, including but not limited to the Anti-Monopoly Law of the People's Republic of China, and prevent and control any prohibited conduct that undermines fair competition. We developed the Tencent Group Anti-Monopoly Compliance Process Management Policy and established mechanisms and processes for compliance management. We continue to enhance the anti-monopoly compliance system, covering the various business units and product lifecycles, through the implementation of key policies and operating guidelines, such as the Tencent Group Anti-Trust Compliance Guidelines, the Tencent Group Overseas Anti-Monopoly Compliance Guidelines, the Guidelines on the Filing Assessment Process for Tencent Investment and Mergers & Acquisitions in China, and the Guidelines on the Prevention of Gun-jumping Behaviours in Merger Control Filings in China for Tencent Investment and Mergers & Acquisitions Transactions.

Our Anti-Monopoly Compliance Department is dedicated to providing advice on anti-monopoly compliance and training for various business units. In daily operations, the department ensures effective management of our compliance efforts through conducting ex-ante risk assessments, ongoing monitoring of policy implementation, and ex-post reviews which enhance management workflows. Our anti-monopoly compliance database aggregates a rich collection of case studies, policies, and research reports. In 2025, we further strengthened our anti-monopoly compliance capabilities using AI, enabling timely updates to our database, and staying abreast of the development of regulatory policies and compliance requirements.

Tencent Music Entertainment Group maintains a robust competition compliance system, which includes non-exclusive collaborations with upstream copyright owners, to ensure its commercial practices adhere to anti-monopoly regulatory requirements.



2.4

Sustainable Supply Chain

Tencent incorporates the [ESG Code of Conduct for Tencent's Suppliers](#) into contracts or the onboarding process, specifying behavioural requirements for all suppliers on labour rights protection, occupational health and safety, environmental protection, and business ethics. We encourage our suppliers to adopt internationally and industry-recognised best practices. With reference to the Responsible Business Alliance Code of Conduct and the Ten Principles of the UNGC, we support them in strengthening their ESG management and disclosures, working together to build a sustainable supply chain.

Guided by the Tencent Supplier Management Policy, we leverage our supplier management system to exercise robust governance throughout the supplier lifecycle, from onboarding and selection to engagement and performance evaluation. This ensures continuous oversight and the mitigation of potential supply chain risks.

Supplier Management Process

Onboarding

We regularly update our supplier database, based on which we assess the validity of supplier qualifications, alongside the requisite service capabilities and experience, to support subsequent performance and risk assessment.

- Our engagement with suppliers is built on a shared commitment to the ESG Code of Conduct for Tencent's Suppliers and the Anti-Commercial Bribery Declaration. We maintain a policy where any breach of these standards leads to the termination of our business relationship.
- We implement the Guidelines for Supplier Blacklist Management. Suppliers who breach requirements such as anti-commercial bribery or confidentiality, or engage in fraudulent practices during our cooperation, will be placed on our blacklist, resulting in permanent cessation of business relations.

In 2025, the number of suppliers in China was 25,219, and the number in other countries and regions was 4,954.

Selection and Engagement

We establish open and transparent decision-making processes to provide qualified suppliers with equal opportunities for business cooperation. The screening and selection of suitable business partners are based on our comprehensive evaluation of their operational capabilities, commercial terms offered and risk profile.

- We require suppliers to disclose all interests involving current or former Tencent employees, with the scope of potential cooperation defined in accordance with the Sunshine Code of Conduct. Any identified fraudulent practices will result in immediate termination of the business relationship.
- We require suppliers to provide all necessary qualifications and analyse public information regarding their labour practices, operations, financial standing, and other relevant aspects. We utilise AI-driven analytics to verify quotation integrity; when potential risks are detected, our management system triggers automated alerts to guide procurement decisions.

During the engagement process, our digital deliverable review platform leverages AI to flag and intercept risks such as duplicate or low-quality deliverables. It provides reviewers with risk alerts and handling guidance.

Performance Evaluation

We require each department to conduct semi-annual performance evaluations for its suppliers, setting qualitative and quantitative indicators to objectively assess delivery capabilities and potential risks. Supplier performance ratings are adjusted based on evaluation results.

- We have established coaching and exit mechanisms to handle under-performing suppliers subject to compliance with relevant contracts.
- If evidence suggests a potential violation of the Guidelines for Supplier Blacklist Management, we will conduct an investigation and if verified, add the supplier to the blacklist.

In 2025, 15 contracting entities were placed on Tencent's supplier blacklist, permanently barred from future partnerships.

Supply Chain ESG Management Practices

Tencent incorporates ESG principles into supply chain management. Requirements of the [ESG Code of Conduct for Tencent's Suppliers](#) are available to all suppliers via our official website, while onboarded suppliers can access an ESG training course and the latest updates to the Code through the supplier portal at any time. In 2025, we joined the 25 Sustainable Value Chain Leaders Alliance initiated by the UNGC and recommended select suppliers for advanced sustainability training. Our practices in building a sustainable value chain were included in the Corporate Practice Case Collection of the UNGC 25 Sustainable Value Chain Leaders Alliance.

Environmental Protection

The [Tencent Environmental Management Policy](#) guides our green procurement by prioritising environmental friendliness as an additional evaluation criterion, including energy-saving, low-carbon products, and waste recycling services. In cases where two or more suppliers have the same or similar scores, the green supplier will be given priority.

We define green or low-carbon certifications as one of the mandatory onboarding requirements for server suppliers and data centre service providers, and incorporate their compliance status and environmental practices into the annual evaluation process. Furthermore, we assisted leased data centres in accelerating their green electricity transition, building on our procurement experience. In 2025, the share of green electricity used in our leased data centres increased from 3.8% in 2024 to 21.4%.

Responsible Content

Suppliers are required to ensure that the content and services they provide comply with all applicable laws and regulations. Deliverables must not contain text, images, audio, or video involving gambling, violence, pornography, abuse, exploitation, fraud, harm to children's welfare, threats to health or safety, or any content that infringes the lawful rights of third parties, including intellectual property, reputation, or portrait rights. Deliverables are subject to review to prevent the release of illegal, non-compliant, or harmful content.

Ethical Employment

We require suppliers to protect the rights and interests of their employees, prohibiting the use of child labour, any form of forced labour, or human trafficking. All human resources service suppliers must adhere to relevant requirements for protecting labour rights and ensuring occupational health and safety. We regularly evaluate service providers' performance, and the results serve as the basis for improving supplier management.

Data Privacy

We require third-party data processing activities to comply with Tencent's privacy protection standards and applicable laws and regulations of the jurisdictions where they operate, and manage suppliers throughout their entire lifecycle through our privacy management system. Firstly, we conduct due diligence on suppliers via questionnaires, qualification reviews, and other assessment procedures, and evaluate the effectiveness of their data protection measures. Secondly, we enter into Data Processing Agreements with suppliers, clearly stipulating their data protection obligations, including the implementation of technical measures such as encryption, de-identification, and anonymisation, and requiring their consent to Tencent's audit rights over their data processing activities. Thirdly, we require suppliers to ensure that data collection, processing, storage, and transmission comply with the security and compliance requirements of applicable privacy and data security laws and regulations in the jurisdictions where we operate, including but not limited to the Personal Information Protection Law of the People's Republic of China ("PIPL") and the EU's General Data Protection Regulation ("GDPR").

In 2025, we provided privacy protection training for suppliers, covering key data protection regulations and emphasising the essential requirements of Tencent's privacy policies and Data Processing Agreements. We also collaborated with value chain partners to sign a Personal Information Protection Initiative, jointly promoting the rights and interests of Internet users.

Business Ethics

We require all suppliers to uphold business ethics, prohibiting conflicts of interest, bribery, fraud, and falsification. The Sunshine Tencent Introduction Brochure requirements are communicated to suppliers through our website, supplier portal, *Weixin official account*, online courses, and in-person training. Since 2023, we have conducted mandatory training for suppliers of our domestic game business covering topics such as intellectual property, confidentiality, compliance, and integrity. By the end of 2025, over 16,000 suppliers had completed the training.

Product Governance

Product governance is essential for fulfilling responsibility, building trust, and driving sustainable value. We prioritise user value by embedding risk management throughout the product lifecycle, ensuring a superior and secure product experience and earning user trust.

Our group-level Technical Committee, comprised of senior executive management and technical leaders from across all business groups, serves as the core decision-making and coordination body for technical strategies and R&D resources. It implements risk management and mitigation strategies, ensuring that our mission of Value for Users, Tech for Good is integrated throughout the product development and operational processes. The Committee oversees several sub-committees across key domains including privacy, security, AI, big data, and open-source collaboration and others.



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UNGC Human Rights Principles

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights;
Principle 2: make sure that they are not complicit in human rights abuses.

3.1

Data Privacy

Principles and Approach

Privacy protection is the cornerstone of our product governance, ensuring our products and services are secure and reliable. By implementing end-to-end data governance and rigorous internal controls, we uphold data integrity throughout its lifecycle, protecting user privacy and strengthening our foundation of trust.

We adhere to applicable privacy and data security laws and regulations in the jurisdictions where we operate, including but not limited to PIPL, GDPR, the UK's General Data Protection Regulation and the Data Protection Act 2018, the California Consumer Privacy Act, and the Singapore's Personal Data Protection Act 2012.

We adopt the PBD (Person, Button, Data) data protection approach and implement industry-leading security measures, including encryption and access controls, to safeguard personal information against unauthorised access, modification, use, or data breaches. Additionally, we provide comprehensive data management functions to empower users with direct control over their personal information.



Person

User-centricity

Enhancing transparency in user data protection to build trust and clarity



Button

User Control

Empowering users by providing intuitive management tools to maintain control over their personal information



Data

Data Stewardship

Ensuring robust security and privacy through compliant, end-to-end management of the entire data lifecycle

Principles for User Privacy Protection



Information Security

Employ appropriate and effective information security technologies and management processes designed to prevent the leakage, damage, or loss of user information.



Confidentiality of Communications

Uphold the confidentiality of users' communications in strict adherence to applicable laws and regulations and provide secure and confidential communication services.



User Choice and Control

Offer clear information management settings, enabling users to manage their personal information with ease.



Reasonableness and Necessity

Collect data only to the extent necessary to provide our products and services.



Clarity and Transparency

Use clear and simple language to explain our privacy policy and how we handle personal information.



Privacy by Design

Integrate privacy protection principles into the development and operation of our products and services.

Governance Framework

We embed privacy protection into our corporate risk management and ESG governance.



Group-level Committee

At the group level, we have established the Personal Information Protection and Data Compliance Committee, led by senior executive management, to formulate policies and oversee implementation. We have also appointed privacy officers, including the Personal Information Protection Officer in accordance with the PIPL and the Data Protection Officer under the GDPR, to coordinate privacy protection initiatives across all business groups and report to the committee.



Privacy Compliance Team

At the operational level, we designate the head of each product department as the primary owner accountable for product compliance, overseeing the implementation and follow-up of privacy impact assessments, ensuring that all data processing activities are necessary, proportionate, and secure. In addition, our Data Compliance and Privacy Department is responsible for building a global baseline, translating regulatory requirements from various jurisdictions into internal operational protocols, and advancing international certification initiatives.



Primary Responsible Person

Legal, technical and business teams collaborate on an ongoing basis to conduct product compliance reviews. A standardised response framework is now in place, which includes regular audits and prompt reviews triggered by updates to management policies or technical specifications.

Policies

Our data protection and privacy governance framework encompasses our entire portfolio of products and services, integrated throughout key stages of our business operations and upheld by oversight mechanisms in place. We have established comprehensive management protocols and compliance guidelines for critical technical implementations and operational processes based on data risk classifications. Furthermore, we enforce stricter protection standards for minors to ensure their digital safety.

The [Tencent Privacy Protection Platform](#) published the Tencent Privacy Policy and product-specific privacy guidelines, clearly disclosing the rules and purposes of data processing. Through transparent information disclosure and accessible feedback channels, we safeguard users' right to be informed.

General Level

The Tencent Privacy Policy is the foundational policy framework for the Group, applicable across all product lines. It defines the core principles and compliance boundaries for data collection, use, and sharing.

Product Level

Product teams develop detailed privacy management guidelines tailored to the functional characteristics of respective products.

Protection of Minors

The [Children's Privacy Protection Statement](#) establishes clear standards for processing minors' information and includes a dedicated email channel (dataprivacy-kids@tencent.com) for minors and their guardians to seek advice and exercise their rights. Furthermore, we monitor industry best practices and regulatory developments to refine our protection policies.

New Technology Risks

To address potential privacy risks arising from the rapid development of AI, we have formulated AI application protocols for our products designed to ensure the protection of user privacy and adherence to applicable laws and regulations in the jurisdictions where we operate.

Protection of User Rights

Tencent provides users with a secure, transparent, and trustworthy digital environment, so their privacy rights are protected.

Data Collection and Use

To support the principles of purpose limitation and data minimisation, user data is collected and processed only to the extent necessary to provide our products and services. We also clearly communicate to users how their data will be used and generally offer them the autonomy to opt in or out of personalised content and advertising recommendations. Users may disable or adjust these settings at any time.

Data Retention Period

Users' personal information is not retained longer than necessary to fulfil the purposes for which it was collected, unless a longer retention period is required or permitted by applicable laws and regulations. We integrate user rights management into product design, such as providing easily accessible means to delete accounts, to facilitate users' exercise of their legal rights.

Communication and Grievances

Tencent has established a redress and response framework with multiple channels to facilitate the exercise of data subject rights. This includes the *Tencent Privacy Protection Platform*, which serves as a unified portal for privacy inquiries across our entire product range, alongside dedicated feedback forms, specialised email and postal addresses, dedicated online data request platform, and customer support channels. Through these mechanisms, users can submit requests related to accessing, copying, rectifying, supplementing, or deleting their personal information. We ensure that all such requests are addressed and processed in a timely manner.

Principle of Purpose Limitation

To support the principle of purpose limitation, any intended use of personal information for purposes other than those specified in our privacy policy triggers prudent assessments. If the new purpose is incompatible with the original one, we will update our privacy disclosures in accordance with applicable laws and, where necessary, obtain users' explicit consent again.

Data Sharing and Third-Party Information Processing

We do not share users' personal information with any third-party companies, organisations, or individuals, except when explicit user consent has been obtained, sharing is necessary for the performance of contractual obligations, or otherwise permitted by applicable laws and regulations. When collaborating with third-party data processors, we adhere to the principles of necessity and data minimisation, ensuring they meet appropriate data protection responsibilities through Data Processing Agreements.

Response to Data Requests

When governments, regulators, or other entities send in data requests, we will thoroughly solicit input from internal and external legal counsels and develop appropriate response plans guided by the following principles:

- We respond to legal requests in accordance with our documented processes, applying them fairly across all jurisdictions where we offer our products and services, with due regard to applicable laws and regulations and the differences among jurisdictions;
- Subject to applicable laws and regulations and where conditions permit, we are transparent with our users in the actions that we take in response to valid legal requests, allowing the relevant users the opportunities to provide feedback on such requests;
- We carefully review all requests so that our responses can comply with all applicable laws and regulations throughout the response process, while fully respecting and protecting our users' legitimate rights and interests.

Risk Management Measures

Tencent implements a closed-loop risk management mechanism encompassing assessment, audit, and improvement. We require all products to undergo privacy compliance reviews prior to launch and conduct Privacy Impact Assessments ("PIAs") as needed, based on their specific operational contexts. We also perform internal audits, in accordance with the Management Specification for Personal Information Protection Compliance Audit of Tencent Group, to ensure that all policies are consistently implemented and risk issues are promptly addressed.



* This image was generated by AI

We implement data compliance governance initiatives across data collection, usage, and transfer processes. Leveraging foundational governance tools, including automated R&D scans, data classification, PIAs, data security measures, audit and oversight mechanisms, we identify and manage compliance risks. For cross-border data transfers, a multi-disciplinary team comprising internal and external legal experts collaborates to assess our security measures and implement programmes designed to comply with the legal and regulatory requirements of each relevant jurisdiction. Where laws and regulations explicitly mandate local data storage, we implement localised deployment.

On a global scale, we have established a multi-layered internal access control framework, reinforced by security management practices, including identity authentication and role-based access management. This approach enhances the technical safeguards for user data protection and reduces the risks of unauthorised access and data breaches. Moreover, we conduct regular security drills, including red-teaming/blue-teaming and penetration testing, to identify system vulnerabilities and potential threats. Furthermore, we proactively identify vulnerabilities and refine our incident response protocols, ensuring robust cyber resilience and data security within a complex threat landscape. For further information on our response measures and data breach management, please refer to the *Product Governance – Cyber and Data Security* section in this report.

At the operational level, we implement and refine data protection measures through routine monitoring and thematic reviews. At the oversight level, our independent team regularly conducts specialised audits, oversees the implementation of improvement measures and ensures closed-loop management.

Employee Awareness and Training

We have established a comprehensive training system to communicate our personal information and privacy protection policies, processes, and standards. This framework strengthens employees' accountability and ensures they possess the expertise to implement data protection requirements throughout our operations. Training is delivered through both online and offline formats, covering all permanent employees, consultants, interns, and workers of contractors. Furthermore, core principles of privacy and data security are deeply embedded within our new-hire orientation and annual Sunshine Code of Conduct training. In 2025, we further mandated privacy protection training for employees handling personal information in emerging businesses, ensuring that compliance requirements are integrated into daily operations.



Certification and Recognition

Tencent actively participates in the formulation of privacy protection standards and holds multiple globally recognised privacy certifications. By the end of 2025, our major businesses and products had obtained multiple privacy-related certifications.

- *WeChat/Weixin* and *QQ* have attained TrustArc certification, while *Weixin* and *QQ* have obtained China cybersecurity level 3 certification. Additionally, *Weixin* has received ISO 27001 Information security management systems certification.
- *Tencent Cloud* has attained multiple security certifications, including ISO 27701 Privacy information management systems, ISO 27018 Code of practice for protection of personal information in public clouds, and ISO 29151 Code of practice for personally identifiable information protection. Please refer to the *Appendix – List of Security Certifications* section in this report.
- *Proxima Beta*, *Tencent Games'* overseas publishing platform, has obtained ISO 27001 and ISO 27701 certifications. The game, *GODDESS OF VICTORY: NIKKE*, has attained TrustArc certification.
- *WeCom* has obtained SOC 2 and SOC 3 service audits, ISO 20000 Service management certification for information technology, ISO 27001, ISO 27701, ISO 27018 and China cybersecurity level 3 certifications.
- *Tenpay* has obtained Personal information protection certification issued by the China Cybersecurity Review, Certification and Market Regulation Big Data Centre.
- *Tencent Docs* has also obtained ISO 27001 certification.
- *Tencent Ads* has attained multiple international certifications, including ISO 27001 and ISO 27701.

We received recognition from industry bodies and authoritative institutions this year, including:

- We were again rated as a Three-Star Unit in the Data Security and Personal Information Protection Social Responsibility Evaluation by the China Cybersecurity Industry Alliance, and were one of only three entities awarded Three-Star status in Personal Information Protection Impact Assessment. Additionally, we were among the first group of entities to receive the standard-level assessment for personal information protection compliance auditing capability.
- Tencent was awarded the Gold Award and the Best Data Breach Response Plan Award at the 3rd Privacy-Friendly Awards 2025 organised by the Office of the Privacy Commissioner for Personal Data, Hong Kong. This marks our second consecutive Gold Award following recognition in the previous edition.



3.2

Cyber and Data Security

Our unified, closed-loop framework manages security across the full product lifecycle. We proactively identify, protect, detect, respond, and recover to safeguard the confidentiality, integrity, and availability of all Tencent systems and data. Tencent Cloud provides our cloud computing infrastructure and holds numerous security certifications worldwide; further details can be found in the *Appendix – List of Security Certifications* section in this report.

During the reporting period, no cybersecurity incidents or data breaches occurred that had, or could have had, a material impact on business operations.

Security Management

We operate a security governance framework encompassing decision-making, coordination, and execution:



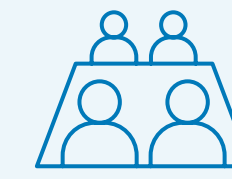
Decision-making

The Information Security Decision-Making Committee, composed of senior executive management, is responsible for strategic planning and resource allocation.



Coordination

The Security Technology Committee, established under the group-level Technology Committee, is the central hub responsible for cross-departmental collaboration and project coordination. The committee holds monthly meetings to assess data compliance, risk mitigation, and emerging technology challenges. Where necessary, critical matters are escalated to the Information Security Decision-Making Committee to seek senior-level support.



Execution

We have joint task forces covering multiple domains to combat illicit and grey market activities. Leveraging industry-leading security technologies and hands-on experiences, they play a pivotal role in executing security strategies to drive the intended impact and maintain a resilient defence system.

Our security policy covers all business activities, with security requirements embedded throughout the product lifecycle, including requirements analysis, architecture design, development, testing, release, and ongoing operations. Our security and legal teams regularly conduct compliance reviews and update security principles and management policies based on business needs, ensuring alignment with risk management frameworks, as well as legal and regulatory requirements.

Security Technology

Tencent employs the most advanced technologies in cyber and data security to protect our products and services operating on *Tencent Cloud*. We invest in security R&D and innovation to strengthen proactive defence capabilities and optimise response strategies, safeguarding both our own operations and the businesses of *Tencent Cloud* customers, thereby fortifying business security and continuity.

Cloud Security

Tencent Cloud utilises its Cloud Security Centre as a unified security management and response platform. By deeply integrating core capabilities, including Cloud Firewall, Web Application Firewall (WAF), and Host Security, we have constructed a multi-layered defence system covering all levels of cloud architecture to maintain a robust and secure cloud environment. Regarding our own operations, we have established a data security governance framework that spans the entire data lifecycle, from collection and transfer to storage, use, and destruction. This framework defines clear management requirements and control measures for every stage. For our cloud customers, *Tencent Cloud* provides technical and management tools that cover the entire lifecycle of cloud adoption, from on-boarding or migration, and cloud-native operations to decommissioning. These resources enable customers to deploy effective measures to safeguard their data, applications, terminals, and accounts.

For endpoint security and access control, we have constructed a Zero Trust security architecture based on the principle of Never Trust, Always Verify. In collaboration with global partners including Microsoft, Google, and Cisco, we formulated the world's first international Zero Trust standard, ITU-T Guidelines for continuous protection of the service access processes, as a blueprint for the global application of Zero Trust frameworks. As a founding member of the China Zero Trust Industry Standards Working Group and an executive member of the Cloud Security Alliance Greater China Region, we co-developed China's first Zero Trust industry standard and are open to sharing our operational know-how to drive industry-wide progress.

Business Continuity

We have established comprehensive disaster recovery plans, underpinned by a rigorous regime of business continuity drills to ensure all protocols remain effective and actionable. Our specialist teams conduct monthly exercises, ranging from cyber defence to large-scale service restoration, and employ chaos engineering to proactively inject faults and anomalous scenarios. This allows us to rigorously test system response times and recovery capabilities under extreme pressure, enhancing our overall resilience. Furthermore, we mandate all data centre management personnel undergo regular security training and emergency drills to ensure that infrastructure security measures are executed effectively. Notably, *Tencent Cloud* was among the first cloud service providers in China to achieve ISO 22301 Business continuity management systems certification.



Security Operation

Tencent has established a robust security operations framework encompassing pre-emptive prevention, real-time mitigation and post-incident optimisation. Leveraging AI and automation, we continuously monitor for potential risks, enabling swift response when anomalies are detected. Following each incident, we conduct thorough reviews to continuously strengthen our defences. By integrating regular security drills, tiered vulnerability remediation and collaboration with external security experts, we embed robust security practices into every facet of our day-to-day operations.

Proactive Defence

We have built a proactive defence framework covering threat identification, vulnerability interception, and behaviour monitoring, enabling the early detection and proactive resolution of security risks. Building on this, we operate a Bug Bounty Programme via the Tencent Security Response Centre ("TSRC"). By offering a combination of financial incentives and industry recognition, we encourage the global community of white-hat hackers and security researchers to report product vulnerabilities. This internal-external crowdsourced security mechanism creates a collaborative, in-depth defence that dually reinforces our security posture.

Our threat intelligence system features real-time collection, intelligent analysis, and automated response capabilities, enabling the early detection and warning of emerging risks, including AI-specific security threats. By synchronising these insights with our broader security suite, the system facilitates automated, network-wide threat neutralisation.

Regarding vulnerability management, we utilise attack path simulation tools to identify and analyse potential vulnerabilities, prioritising their remediation before they can be exploited. We employ threat modelling and AI-driven security technologies to detect suspicious behaviour, enabling attack path reconstruction and quantitative risk assessment. To ensure the continued robustness of our defences, we conduct rigorous annual security testing and risk evaluations across all information systems.

Incident Response

We prioritise the rapid containment of cyberattacks and the effective remediation of security vulnerabilities. Leveraging AI-driven risk pre-assessment and automated log analysis, we enable intelligent triage and precise localisation of security incidents, automatically triggering emergency response protocols. The Tencent Security Incident Management Policy defines standardised procedures for monitoring, early warning, emergency response, and post-incident review, ensuring a "detection-containment-remediation" closed-loop process. For intrusion events, our security teams are mandated to contain the impact within 30 minutes; for DDoS attacks, response protocols will be activated and restoration will commence within 3 minutes. Following an incident, security specialists will conduct a comprehensive review of attack vectors and vulnerabilities to refine defence strategies and enhance emergency response capabilities. Regarding vulnerability management, we implement tiered controls based on business impact: critical vulnerabilities are addressed within 2 hours, while standard vulnerabilities are resolved within 3 days. Furthermore, we have established internal reporting channels; employees can report security incidents, vulnerabilities, or suspicious activities via a dedicated TSRC *WeCom* account, which directly triggers the emergency response workflow. Our legal and communications teams collaborate closely to manage public statements, ensuring the timely communication to stakeholders.



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Third-Party Audits and Certifications

We conduct internal security reviews and risk remediation across our IT infrastructure and information security management system at least once a year, in accordance with internationally recognised security and IT control standards. This ensures that our defence measures remain robust and effective in the face of rapidly evolving security risks. In addition, *Tencent Cloud* undergoes a Service Organisation Control audit every six months, performed by an independent third-party professional firm. These audits assess controls related to the security, availability, and confidentiality of the *Tencent Cloud* platform. Depending on the type of assurance engagement, audit reports are made available to cloud customers and their auditors and other stakeholders to meet relevant requirements.

Tencent Cloud has obtained numerous key international certifications, including ISO 20000. In 2025, *Tencent Cloud* further expanded its portfolio of globally recognised security accreditations, including the Data security management certification (China), CIS Benchmarks (US), Cyber TrustMark (Singapore), and SNI 27001 certification (Indonesia). For further information on security certifications, please refer to the *Appendix – List of Security Certifications* section in this report. Furthermore, we continue to deepen international collaboration in the fields of data security, personal information protection, and cybersecurity. Through participation in standard-setting, technical community development, and industry-academia integration, we aim to deliver adaptable security solutions to the industry.



Employee Training

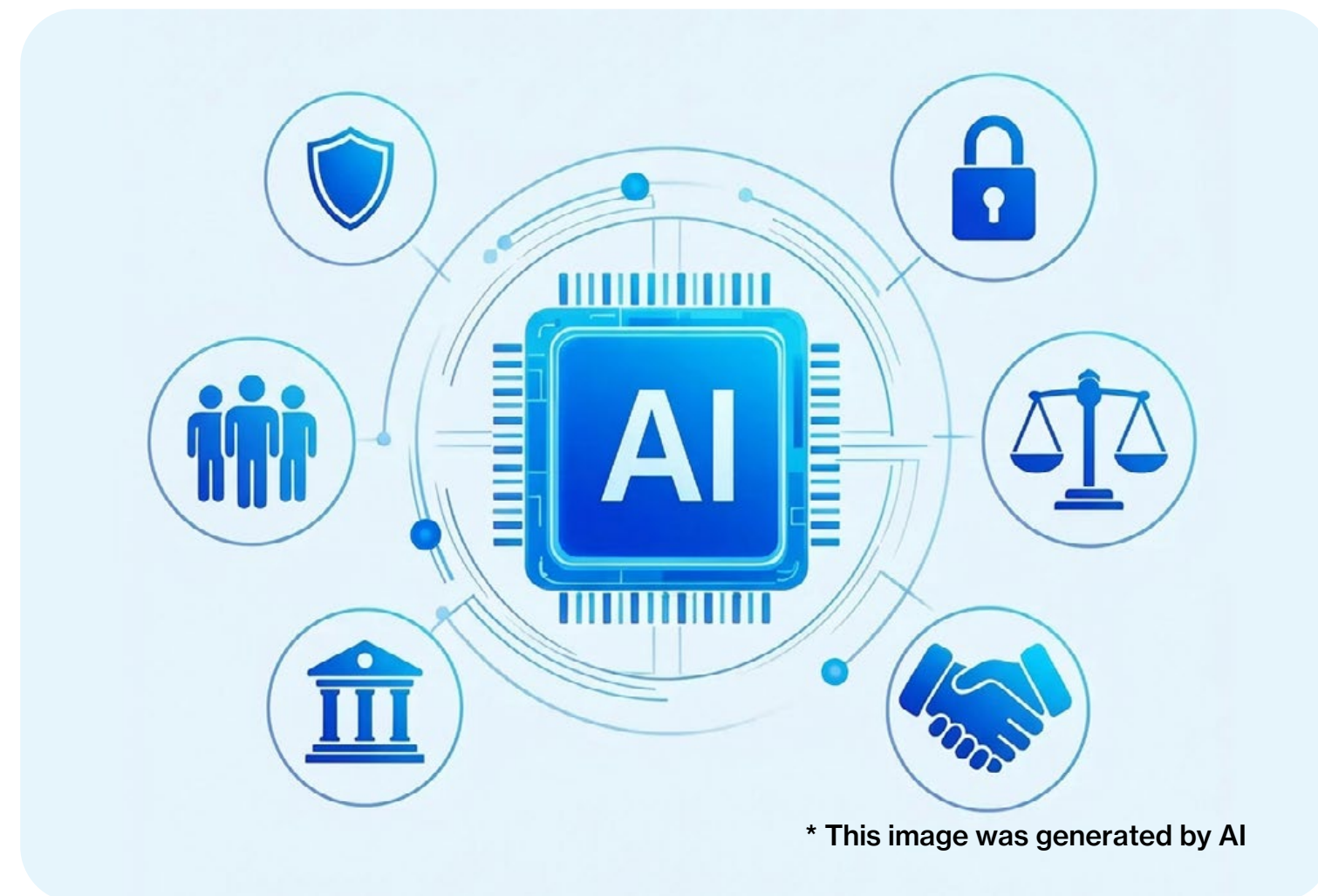
Our security training programmes include mandatory courses for all employees, role-specific training for key positions, and elective professional courses. The curriculum covers basic awareness of security, vulnerabilities and defence, secure coding guidelines, data security, and AI security. All new hires are required to complete information security training upon onboarding. Employees in specialised roles have to complete targeted training to master the latest technical standards and security protocols. Every employee is required to study the information security provisions set forth in the Tencent Sunshine Code of Conduct and pass the associated annual assessment. We also promote cyber and data security awareness through various initiatives, including the Tencent Security Technical Summit, regular security assessments, internal blog campaigns, and interactive quizzes. In 2025, over 61,000 employees participated in information security and privacy protection training.



3.3

Responsible Artificial Intelligence

Artificial intelligence has become an integral part of our technological foundation, now deployed across more than 700 product use cases. In our pursuit of user and social value, we leverage AI to refine personalised experiences and bolster individual productivity, while supporting the digital and intelligent upgrade of industries. Regarding risk identification and management, AI has enabled us to enhance the precision and efficiency of our privacy protection and data security initiatives, while sharpening the responsiveness and vigilance of our internal controls and supply chain management. Our Tech for Good mission serves as the foundation for the development and deployment of AI at Tencent, and our robust internal governance ensures our technical progress is anchored in AI safety and security.



Tencent Responsible AI Principles

- 1 We believe that AI should always serve humanity, in line with our corporate mission of Tech for Good.
- 2 We continuously refine our AI risk governance framework, implementing effective management across critical areas including privacy protection, data security, algorithmic fairness, and the prevention of technological misuse to bolster our AI safety capabilities.
- 3 We have established a risk identification and response mechanism covering R&D, deployment, and operational phases. By setting safety red lines and iteratively optimising protective measures, we can identify security hazards or emergencies rapidly and handle them effectively.
- 4 We communicate AI capability boundaries and limitations to users, providing clear explanations or identifiers to guide reasonable expectations.
- 5 We promote industry collaboration by contributing to technical standards and community development, partnering with stakeholders to drive the human-centric development and responsible deployment of AI.

Management Structure and Policies

The AI Technical Committee, one of the sub-committees established under the group-level Technical Committee, is responsible for cross-departmental technical coordination, as well as providing security assessments and governance on AI projects. Comprising AI technical leads from various business groups, the Committee oversees technical working groups including AI evaluation, trustworthy AI, and recommendation algorithms, which cover AI application development guidelines, performance evaluation, and ethical considerations.

Our research into AI safety and security spans multiple dimensions, from intrinsic safety to systemic defence, encompassing value alignment, privacy protection, deepfake detection, agent security, and risk control for AI-generated content ("AIGC"). We have conducted numerous large-scale internal security drills to enhance the robustness and reliability of our AI systems. In 2025, we further refined our AI management policies by introducing standardised protocols for critical stages, including model R&D, testing, and deployment. These protocols define key requirements for privacy protection and product compliance. We have developed a living framework for Responsible AI governance that spans a wide range of domains and is iteratively refined by evolving industry practices and latest governance trends.

Tencent Cloud is certified under the ISO 42001 Artificial intelligence management system standard, establishing an auditable compliance framework. This ensures that the entire process, from development and deployment to governance of AI systems, aligns with established standards.

AI Safety Governance

The development of AI remains at an early stage, accompanied by complex and dynamically evolving risks and governance challenges for which there is currently no universal blueprint. We have established standardised management processes covering data governance, algorithm governance, security safeguards, and operational compliance. While enhancing the usability of our technologies, we proactively mitigate the associated risks and continuously refine our AI safety governance.

Data Governance

We employ standardised data processing workflows, leveraging granular access control mechanisms and the rigorous auditing of high-fidelity data sources. By applying safety filtering techniques such as denoising and anonymisation, we cleanse high-risk data to enhance the quality of our training sets. Building on our operational expertise, we have developed a proprietary privacy protection system for AI applications. This system features intrinsic de-identification capabilities for training data, providing universal privacy protection for AI deployments. In November 2025, this system was awarded the AI Pilot Starlight Gold Award at the inaugural National AI+ Application and Skills Competition.

Security Safeguards

To address technical risks inherent in AI systems, we conduct adversarial red-teaming exercises to proactively identify and remediate vulnerabilities. Simultaneously, we continuously iterate our security frameworks to enhance the robustness and reliability of AI applications in complex operational environments. Regarding technical capabilities, we have developed a proprietary model security auditing platform that integrates security auditing capabilities including vulnerability scanning, Model Context Protocol risk detection, and large-scale model safety assessments. Complementing this, our intelligent security gateway provides real-time run-time protection by detecting and intercepting threats such as computational resource abuse, prompt injection, and data leakage, providing a secure environment for AI deployments.

Algorithm Governance

We embed core considerations, including privacy protection, the prevention of misuse, bias mitigation, and the promotion of fairness, from the earliest design stages to ensure models are aligned with human values and judgements by design. To ensure institutional accountability, we implement cross-functional review mechanisms involving technical, security, operational, and legal departments to conduct compliance reviews across the algorithmic logic and decision-making processes. By employing techniques such as Supervised Fine-Tuning and Reinforcement Learning, we calibrate model alignment with ethical standards while continuously enhancing algorithmic explainability. To address and mitigate AI hallucinations, we implement tailored risk-mitigation strategies across diverse use cases, enhancing the accuracy and reliability of all outputs through verification mechanisms.

Operational Compliance

We leverage AI technologies to strengthen product operational monitoring and mitigate content-related security risks. In terms of content labelling, we adhere to the Measures for the Labelling for Content Generated by Artificial Intelligence, applying both explicit and implicit labelling to AIGC outputs. We have developed proprietary AIGC detection and authentication technologies that provide multimodal detection across text, images, and video. By adding prominent labels to suspected AIGC, we proactively address and manage deepfake risks.

Additionally, we have developed standardised internal review protocols, implementing compliance reviews prior to product launch and continuous reviews and risk assessments throughout every stage of operation.

- Pre-launch: We implement cross-functional joint review mechanisms to rigorously assess model safety and compliance, ensuring full adherence to applicable regulatory requirements prior to release.
- Post-launch: Through a combination of automated monitoring and manual sampling, we continuously track model accuracy, stability, and fairness, while managing bias and inappropriate content. Furthermore, we conduct operational assessments based on real-world scenarios to ensure prompt response and risk mitigation upon identifying any deficiencies.
- Feedback and Iteration: Users can provide feedback or report misconduct, such as fraud or impersonation, via in-product portals, our official website, or *Tencent Guardian*. All feedback will be logged, categorised, and analysed, providing actionable insights for our technical teams to conduct targeted model optimisations, thereby ensuring a cycle of continuous improvement.

During the reporting period, Gartner recognised *Tencent Cloud* as a representative vendor in China for AI Security Testing, while Forrester included *Tencent Cloud* among global representative vendors for Bot and Agent Trust Management.

Contributing to Healthy Development of the Industry

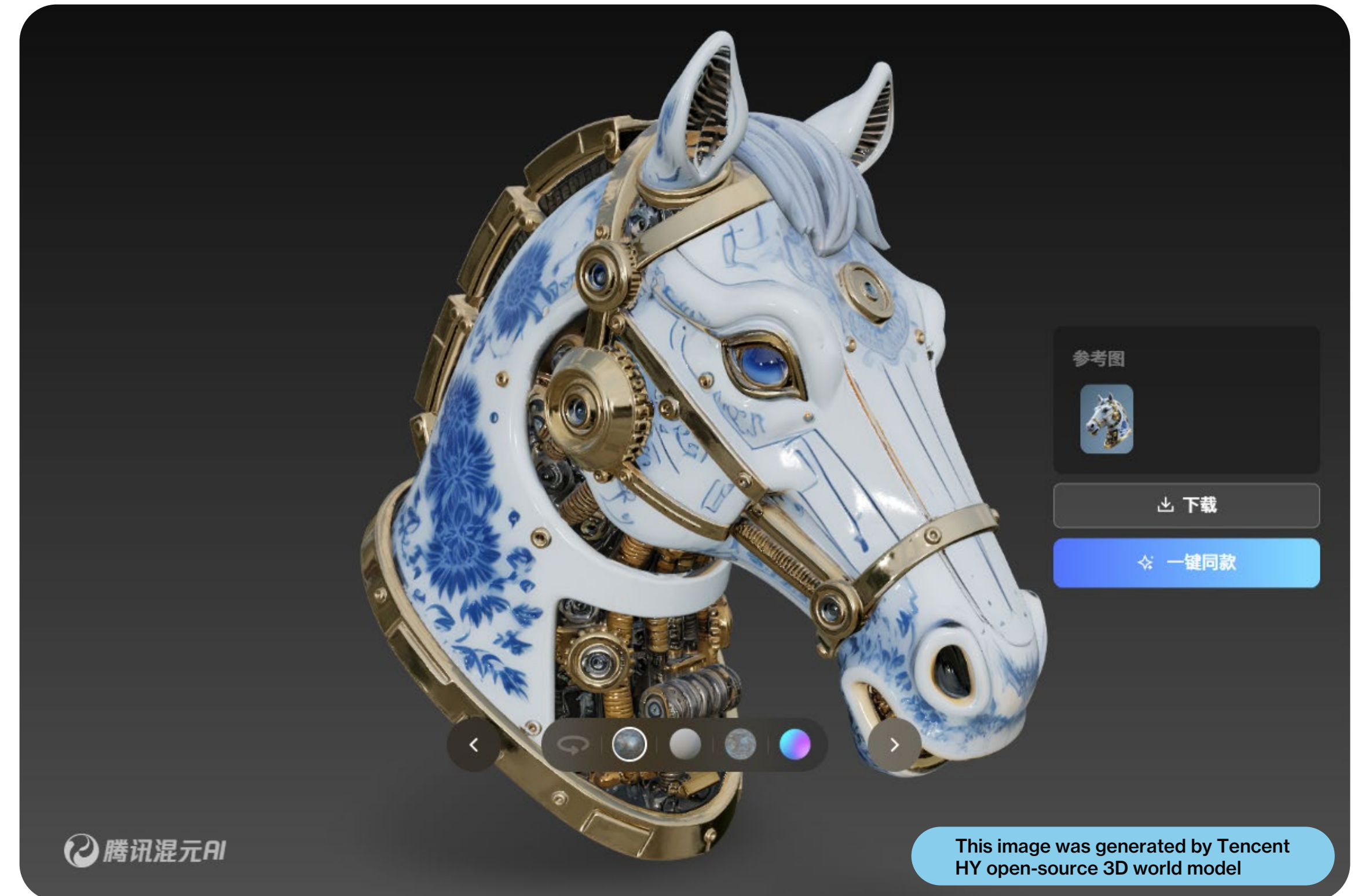
Tencent regards AI safety and security as the bedrock of robust and sustainable development. As one of the inaugural signatories of the AI Security Commitment issued by the China Artificial Intelligence Industry Alliance, we have pledged to integrate safety responsibilities throughout the entire R&D and application process, prioritising practices in security evaluation benchmarks, supply chain security, and application security testing. Furthermore, we served as a key drafting member for the first set of international standards for large model security initiated by the World Digital Technology Academy, actively contributing to the formulation of the Generative AI Application Security Testing Standard and the Large Language Model Security Testing Method.

We actively contribute to the technical community, driving the adoption and innovation of AI technology. *Tencent HY* open-source model portfolio encompasses text, image, video, and 3D generation modalities, offering a diverse range of model sizes to accelerate industrial adoption. Notable milestones include the 2025 release of the *Tencent HY* 3D world model, which has served as a significant reference for global 3D content generation and technical research. Furthermore, the subsequent release of the *Tencent HY* Translation Model 1.5, supporting bidirectional translation across 33 languages and 5 dialects, is available in 1.8B and 7B variants, providing flexible deployment options for both edge and cloud environments.

The long-term, healthy development of the AI industry hinges on balancing the pace of innovation with risk management, ensuring that technological evolution remains dedicated to advancing human well-being. This necessitates a steadfast focus on AI safety and governance. We look forward to collaborating with our industry peers to promote self-regulation, practise Responsible AI principles, and proactively embrace stakeholder feedback and oversight, uniting to drive the steady and sustainable growth of the AI industry.



Tencent participated in industry sharing regarding practices on AI security and safety commitments



3.4

Trustworthy Internet Platform

Tencent is committed to maintaining a secure and trustworthy Internet platform, implementing measures to protect minors, enhance content governance, protect consumer rights and interests, and strengthen customer service management. We endorse international conventions and principles, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the Global Principles on Digital Safety, and the Internet for Trust initiative.

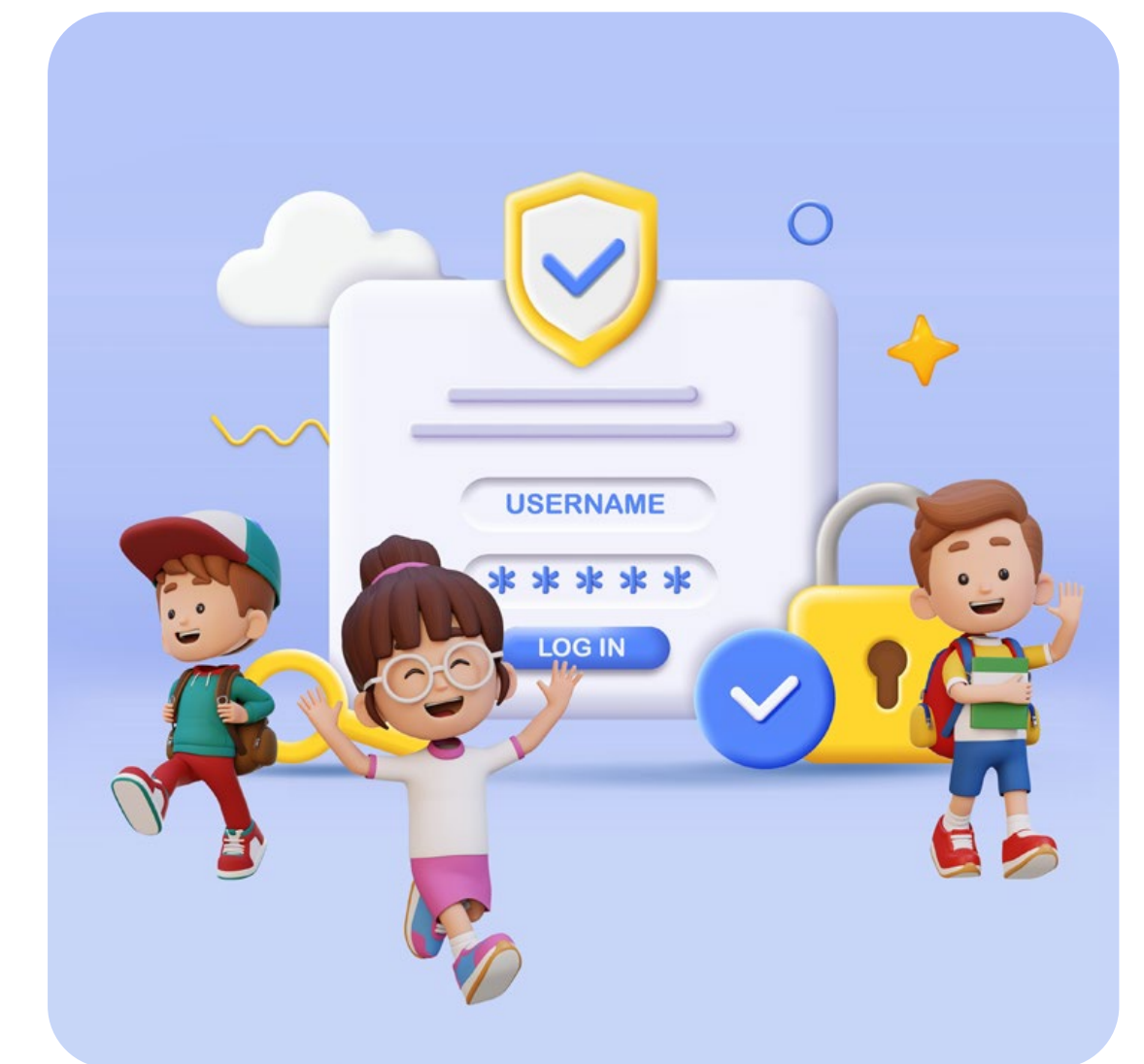
Protection of Minors

Tencent pays close attention to the online content that minors may come into contact with and takes appropriate measures against content that potentially has negative impacts on their cognition, social interactions, and emotions, including pornography, violence, self-harm, cyberbullying, and sexual harassment. We comply with applicable minor protection laws and regulations in the jurisdictions where we operate, and align with international frameworks such as the Convention on the Rights of the Child, the Children's Rights and Business Principles, the Towards a Child-centred Digital Equality Framework, and Guidelines on Child Online Protection.

We have established a cross-departmental Joint Committee for the Protection of Minors, led by senior management, to oversee related matters and develop policies that guide our products and services. Our operations are conducted in accordance with the principle of prioritising minors' best interests. Our protection of minors in the digital environment encompasses both the prevention of harm and positive development, leveraging product capabilities and quality content, and collaborating with social stakeholders to safeguard the healthy growth of minors in the online world.

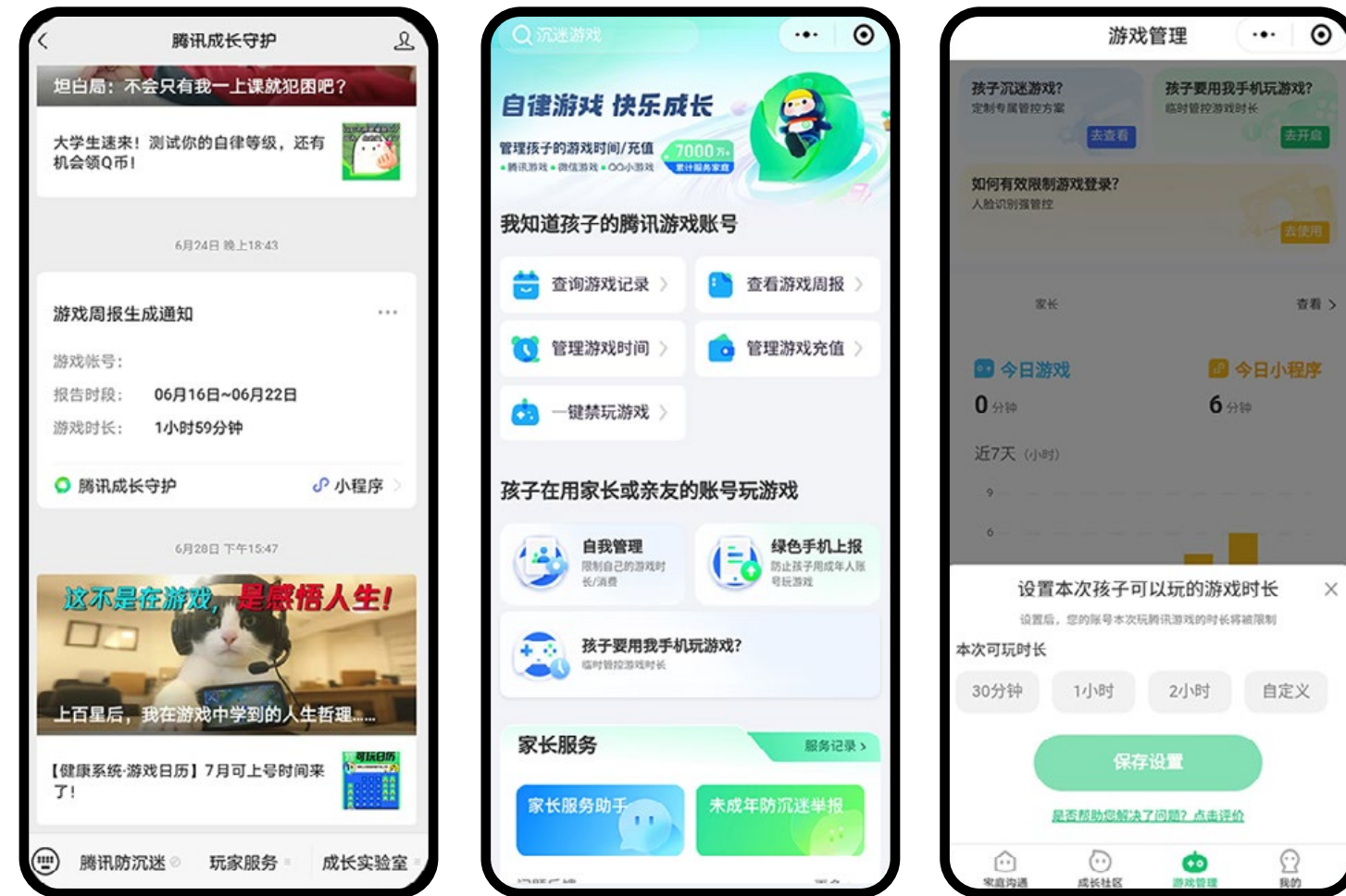
Given that minors in different age groups vary in their abilities to assess content, we have introduced minor modes with age-appropriate design to guide them in developing a positive mindset and digital literacy. Measures on minor protection have been implemented for many years across our platforms, such as *Weixin*, *QQ*, *Tencent Video* and *QQ Music*. For example, under minor mode, parents or guardians can control the availability of the *Weixin Video Accounts*, and the content shown is tailored to the minor's age and the preferences set by their parents or guardians; access to the *Live Streaming* feature on *Weixin* is disabled by default and cannot be changed. In addition, *Tencent Video* has extended its minor protection features, including age-appropriate content recommendations and parental controls, to the TV platform.

We prohibit the display and recommendation of specific advertising categories to minors across our platforms, such as medical and pharmaceutical products, beauty treatments, tobacco and alcohol, financial loans, online games, entertainment live streams, and dating services. Our advertisement review system filters out non-compliant content, including content that induces spending by minors or is likely to prompt the imitation of harmful behaviours. For more details on advertising content management, please refer to the *Product Governance – Trustworthy Internet Platform – Advertising Content Governance* section in this report.



In the Chinese Mainland, our protection measures within online games include real-name verification, time limits, and spending limits. Minors are allowed to log in to games only between 20:00 and 21:00 on Fridays, at weekends, and during public holidays. Different in-game spending limits apply to different age groups. Users under the age of 12 are prohibited from spending in any Tencent games.

Parents can use the *Tencent Parental Guardian* Mini Program to link their child's game account and set playtime and spending limits. The Mini Program also offers video and phone consultations, live courses, and AI-assisted Q&A to provide parents with management guidance. By the end of 2025, the Mini Program had supported over 80 million users.



Tencent Parental Guardian Mini Program

We are monitoring local laws and regulatory expectations to ensure alignment with age restrictions for game players in markets around the world. We established the [Level Infinite Family Center](#), a platform that enables parents or guardians to manage minors' accounts across supported game titles. It sits alongside our [Transparency Center](#), an online portal that provides educational resources to parents on responsible gameplay. Parental or guardian consent is mandatory for account creation in markets where players fall below the minimum age for data processing. Parental consent is confirmed and verified through multiple methods based on local requirements and industry standards, and include options such as email confirmation, credit card authorisation, or other approved self-confirmation processes.

We collaborate with families, schools, communities, and other stakeholders to enhance minors' digital literacy through training programmes and outreach activities. *Weixin Video Accounts* hosts live training sessions on themes such as online safety and self-protection for minors. *Tencent Service Platform for Parents of Minors* Mini Program has provided parents with family education courses, expert consultations, and AI-powered Q&A services, and has so far provided over 44 million users with educational resources and coaching tips. Tencent Youth Care Workstation and *Tencent Customer Service's* Minors Protection Camp deliver online safety tutorials to schools, communities, and rural areas, helping children and their families develop safe and healthy Internet habits.



Summer camp on Internet safety hosted by Tencent Youth Care Workstation



Rural campus tour hosted by Tencent Customer Service's Minors Protection Camp

The 2025 Progress Report on the Protection of Minors in China's Game Industry published by the Game Publishing Committee of the China Audio-Video and Digital Publishing Association shows that 71% of minors played games for less than 3 hours per week, and over 90% of minors spend within monthly limits, demonstrating the effectiveness of foundational measures such as time and spending limits in China. Additionally, over 50% of surveyed parents had used minor protection tools, reflecting progress by game companies in raising awareness of parental controls.

Fostering Healthy Content Ecosystems

Tencent fosters healthy content ecosystems across our platforms, prohibiting the publishing, transmission, distribution, or storage of any illegal and harmful online content, which includes abuse, violence, illegal drugs, fraud, terrorism, extremism, hate speech, misinformation, discrimination, harassment, self-harm, and pornography.

Weixin Rumour Debunking Assistant Mini Program and debunking reports on the *Weixin Official Accounts Platform* help users identify online misinformation. *JiaoZhen AI* Agent helps users verify information accuracy, presents the fact-checking process and conclusions, and facilitates cross-checks across official institutions, experts, and AI. This agent is available on *Tencent News*, *Weixin Mini Program*, and *QQ Browser*.

Users can lodge a complaint through *Tencent Customer Service* or the appeals channels of each product when they find content suspected of being illegal, in breach of regulations, harmful, or false. Our product team verifies all reports and takes appropriate actions against the violating account based on the severity of the violation. By regularly disclosing updates on platform content governance, we keep users informed of our measures and help deter potential misconduct, thereby fostering a healthy online environment.

We implemented policies on content safety management, including the Management Code on Information Content Safety and the Code of Conduct for Emergency Response to Information Content Safety Incidents, and have integrated content safety practices throughout the product lifecycle. Business teams conduct risk evaluations based on product features, implementing appropriate content safety policies and protective measures to identify and address illegal and harmful content. In addition, we developed content creation guidelines and instructions to help creators reduce the risk of producing such content.

We require creators to comply with applicable laws and regulations when using AIGC. Creators are required to proactively declare and label such content when publishing. Our platform, which automatically detects content presumed to be AIGC but lacking proper labelling, will inform users by adding a caption near the content.



AIGC declaration feature on Weixin Video Accounts

Combating Online Fraud

We established the Anti-Fraud Joint Project Group, overseen by the senior management team and composed of key business leaders, operating under the Tencent Group Anti-Fraud Governance Policy, the Tencent Business-related Fraud Risk Assessment Guideline, and other related policies.

When users engage in risky actions such as clicking questionable links, scanning suspicious QR codes, or adding unfamiliar contacts, platforms including *Weixin* and *QQ* present a warning and redirect users to *Tencent Anti-Fraud Assistant*. This AI agent identifies fraud based on user input, asks follow-up questions, and offers actionable advice. By the end of 2025, *Tencent Anti-Fraud Assistant* had recorded over 83 million uses.

When users discover potential fraud, they can lodge complaints through entry points on platforms or the *Tencent Guardian* Mini Program. We will take action against offending accounts once the reported issues are verified.

Furthermore, we promote anti-fraud knowledge via the *QQ* promotion zone, live streams on *Weixin Video Accounts*, and advertisements on *Weixin Moments*. In 2025, *Tenpay* supported the People's Bank of China's Youth Anti-Fraud in Action campaign, using case studies, games, short videos, and talk shows to enhance the anti-fraud capabilities of the youth.

Prohibiting Sales of Counterfeit and Illicit Goods

We prohibit the sale of counterfeit goods across our platforms, demonstrating our commitment to protecting the rights and interests of customers and intellectual property owners.

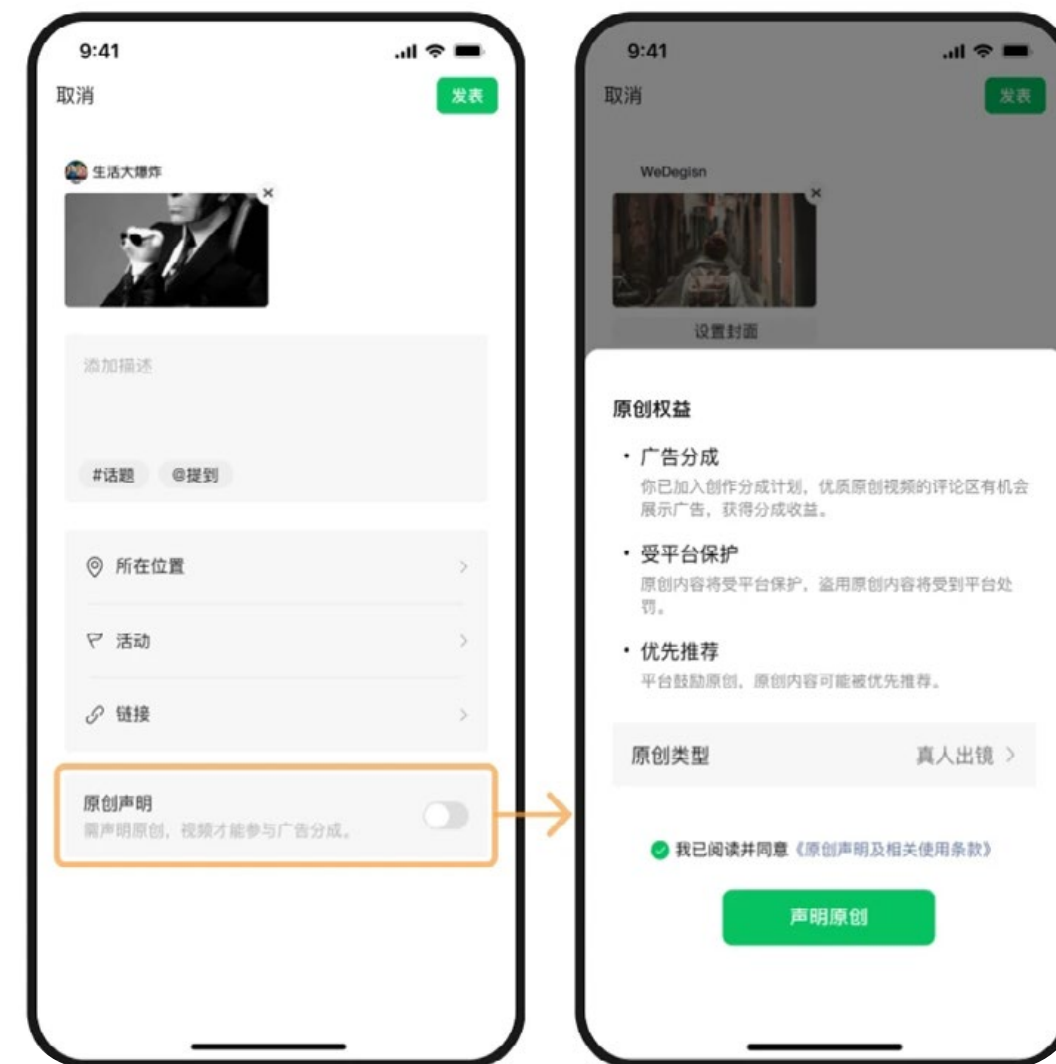
- On the *Weixin Video Accounts* live-streaming feature, we have established a mechanism to combat counterfeit content, updating and optimising detection models to automatically monitor and suspend live streams suspected of selling counterfeit goods, and take action against relevant streamers.
- On the *Weixin Mini Shops* feature, we conduct qualification checks at the stages of merchant onboarding and product listings to prevent the release of counterfeit goods. We monitor illegal sales and non-compliant products to ensure the timely handling of infringement.

Users who suspect others of marketing or selling counterfeit goods via personal *Weixin* accounts can submit infringement leads to the *Weixin Brand Protection Platform*. After brand owners verify the user leads, we will take appropriate actions against offending accounts, including removing the infringing content and suspending the accounts. By the end of 2025, the platform had onboarded over 700 IP rights owners, spanning regions including Asia, Europe, and North America.

In addition to the *Weixin Brand Protection Platform*, we provide various tools for users to report different infringements, including *Weixin Mini Shops Brand Infringement Complaint Assistant* Mini Program and infringement reporting features on *Weixin Official Accounts Platform* and *Weixin Video Accounts*.

Protecting Intellectual Property

We fulfil our platform responsibilities by clearly stipulating in our user agreements and platform rules that infringing upon the intellectual property ("IP") rights of others is prohibited. On *Weixin Video Accounts* and *Weixin Official Accounts Platform*, we provide creators with the originality declaration feature, enabling them to label their original content to clearly indicate rights ownership. Additionally, we raise users' awareness of IP protection through platform announcements and online campaigns.



Originality declaration feature on *Weixin Video Accounts*

We provide creators with tools for content distribution, account management, data analysis, and promotion to enhance their creative efficiency and operational capabilities. Through programmes such as the "Polar Star" programme for short-video creators, we encourage the continuous production of high-quality content. Tencent Music Entertainment Group and China Literature Limited have also launched programmes including their respective "New Musician Plan" for original musicians and "Young Writers Support Plan" for young talents. By championing high-quality output and protecting original rights, we aim to foster a sustainable and creative ecosystem. For rights holders, including creators and users, we provide channels to report suspected infringements. Each case is carefully reviewed, and appropriate actions are taken promptly in accordance with established procedures to mitigate risks and prevent further distribution of infringing content.

To safeguard our intellectual property, we have established a multi-layered protection framework. From the outset, we employ data encryption, digital watermarking, and other technical measures to mitigate the risk of unauthorised use. Through a combination of technical screening and manual review, we promptly identify and preserve evidence of infringement, and defend our rights through issuing warning letters, infringement notices, and pursuing legal action as appropriate. By the end of 2025, we had been granted over 52,000 patents in major countries and regions worldwide.

We actively engage in industry collaboration, sharing best practices with our partners and participating in domestic and international standard-setting organisations, including the China Communications Standards Association, ITU-T, ISO/IEC, and IEEE. Our efforts in intellectual property protection have been widely recognised, receiving numerous prestigious awards including the Trademark Innovation Award, the China Copyright Gold Award, and multiple China Patent Gold Awards. Tencent has also been named among both the Top 50 Model Enterprises for Trademark Protection in China and the Top 100 Enterprises for Intellectual Property Protection in China. In 2025, Tencent ranked second in Clarivate's [Top 100 Global Innovators](#) list.

Enhancing Fairness and Transparency in Algorithms

We utilise algorithmic recommendation technologies to enhance user experience, continuously improving transparency and explainability by providing clear descriptions of the fundamental principles, purposes, and primary operating mechanisms of these services. These initiatives are widely integrated into our efforts to protect minors and seniors, actively putting the "Algorithms for Good" philosophy into practice. In 2025, we became a signatory to the Nanning Declaration on Algorithms for Good. We launched several initiatives focusing on increasing algorithmic transparency, enhancing recommendation quality, and refining user preference management. Our goal is to strike a better balance between "recommending relevant content" and "exploring diverse content", while preventing algorithmic bias and discrimination. We published *Understanding the Weixin Video Accounts Recommendation Algorithm* – a quick guide designed to intuitively explain the basic logic and mechanism of its algorithm.

Advertising Content Governance

The Tencent Group Advertising Business Compliance Management Guideline provides regulatory guidance for our advertising operations. This Guideline is formulated and updated by legal, internal control, and public relations functions and endorsed by senior management.

We provide advertisers and advertising service providers with a series of policies covering registration, advertiser qualification review, content review, and archiving, which are available in the [Help Centre](#) on the official website of *Tencent Ads*.

- The Tencent Advertisements Review General Rules explicitly prohibit illegal advertising content, including gambling, violence, discrimination, issues affecting children's well-being, threats to health and safety, weapons, illegal wildlife, and products related to endangered species. The rules also include explanations and case-based guidance to strengthen enforceability.
- The Code of Conduct for Tencent Advertising Service Providers and the Code of Conduct for Advertisers on Tencent Advertising Platform define the responsibilities and obligations of advertising service providers and advertisers, as well as the consequences of violations.

Risk Management Throughout Advertising Process

Before placement

We use several pre-emptive controls to limit non-compliant advertisements. We verify advertisers' identities and qualifications, assess their business operations, reputation, and past conduct, and review the goods and services proposed for promotion. Our review system automatically detects and filters non-compliant content. Its advertiser blacklist also blocks non-compliant entities and their promotional channels, including apps and website links.

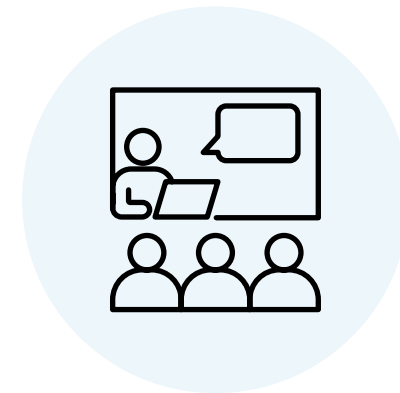
During placement

We use a human-machine collaborative approach to review and intercept non-compliant content. Content flagged by our machine learning model as potentially non-compliant is reviewed by our moderation team and handled accordingly. We invest in technical resources to enhance the capability and coverage of our model, and provide specialised training to improve our moderators' skills in identifying and handling non-compliant content.

After placement

We reassess all approved advertisements using automated systems and manual checks to prevent risks such as landing page tampering. We also collect stakeholder feedback to improve the effectiveness of our advertising review processes.

We promote advertising compliance among advertisers and advertising service providers through online and offline training, illustrating violation cases, offering compliance recommendations, and providing access to dedicated personnel to address their enquiries.



Training

We provide risk control certification programmes for all advertising service providers. The training covers risk management in advertising operations and is regularly updated to align with current regulatory requirements, helping them establish their own risk control systems. Participants who complete the training and pass the assessment are eligible for our risk control qualification certification.



Communication

We offer multiple channels for advertisers and advertising service providers, including customer service portals on *QQ* and *Weixin*, and email. We launched *Tencent Ads Smart Ask* Mini Program, an AI agent that provides instant answers to inquiries on placement policies, content reviews, data analysis, and marketing.

Payment Security and Protection of Rights and Interests of Financial Consumers

Tencent has established a robust FinTech risk management system designed to centrally coordinate various risk types and provide end-to-end oversight across all business processes.

- **Compliance risk**

We enhance our risk prevention and compliance control systems to ensure that payment and financial services comply with applicable laws and regulations.

- **Information technology risk**

We have established a robust information classification and protection system to safeguard data security and system stability, covering risk identification, assessment, measurement, and monitoring.

- **Operational risk**

We have strengthened internal controls through a clear organisational structure and effective delegation of responsibilities, enabling policies and procedures to be properly implemented. *Tenpay* routinely conducts self-assessments to enhance risk control across its operations.

Our payment platform can process hundreds of thousands of mobile payments per second. Payment processing time is reduced to milliseconds, with second-level self-healing capabilities in the event of data centre failures. Our payment platform offers comprehensive commercial solutions, including self-developed, efficient commercial encryption systems and financial-grade distributed databases.

We have established an integrated security framework covering *Weixin Pay*, merchants, and third-party partners. It incorporates customisable protective measures and maintains a database of black-market samples to support security intelligence alerts across the network. Additionally, transaction security is enhanced through interdepartmental collaboration, regular security drills, and risk prevention mechanisms jointly developed with handset manufacturers.

Enhancing Anti-fraud Capabilities

We have established an intelligent anti-fraud system that utilises multifaceted monitoring and joint defence mechanisms to implement comprehensive process control. We support law enforcement in combating telecommunications fraud and contribute to fraud-prevention initiatives, having prevented hundreds of thousands of fraudulent transactions.

While safeguarding users' personal privacy, we have implemented an anti-fraud mechanism in *Weixin Pay* to prevent and deter fraud. When a potential fraud risk is detected, *Weixin Pay* displays a warning on the transaction page and activates the Anti-Fraud Customer Service Assistant. Powered by the *Tencent HY* model, this service leverages advanced reasoning and response capabilities to engage users in real time via text chat or voice calls, deterring users from proceeding through conversational interaction.

Protecting Financial Consumer Rights

The Tencent Financial Consumer Rights Protection Committee oversees planning, formulates internal policies on consumer rights protection, sets and monitors objectives, and reviews major issues. The Tencent Financial Consumer Rights Protection Department aims to ensure that all business units comply with relevant requirements.

In 2025, we implemented the Tencent Group Compliance Guidelines for the Protection of Minors in Financial Consumer Payment Services, which require *Tenpay* to fully consider the development and protection needs of minors when providing payment services and processing transactions, ensuring the fulfilment of protection responsibilities. In practice, under *Weixin's* Minors Mode, parents or guardians can set per-day and per-transaction limits on minors' *Weixin Pay* accounts, and access to financial services such as credit card repayments and *LiCaiTong* is disabled.

We promote financial consumer protection among employees and partners through culture day activities, online courses, and in-person training. By the end of 2025, cumulative participation in mandatory online courses for relevant employees had exceeded 25,000. We also provide public financial education through an offline education experience space and an online platform, with tailored programmes for key groups such as the silver generation, university students, and adolescents to enhance their financial literacy.

In 2025, we introduced a financial investor education mode in our mobile game *Dream Star*, transforming real-world investment scams such as pension-backed housing schemes and financial statement fraud into interactive quests. Users advance by learning to recognise scam tactics and prevention methods. By the end of the year, over 1.2 million users had engaged with this game mode.



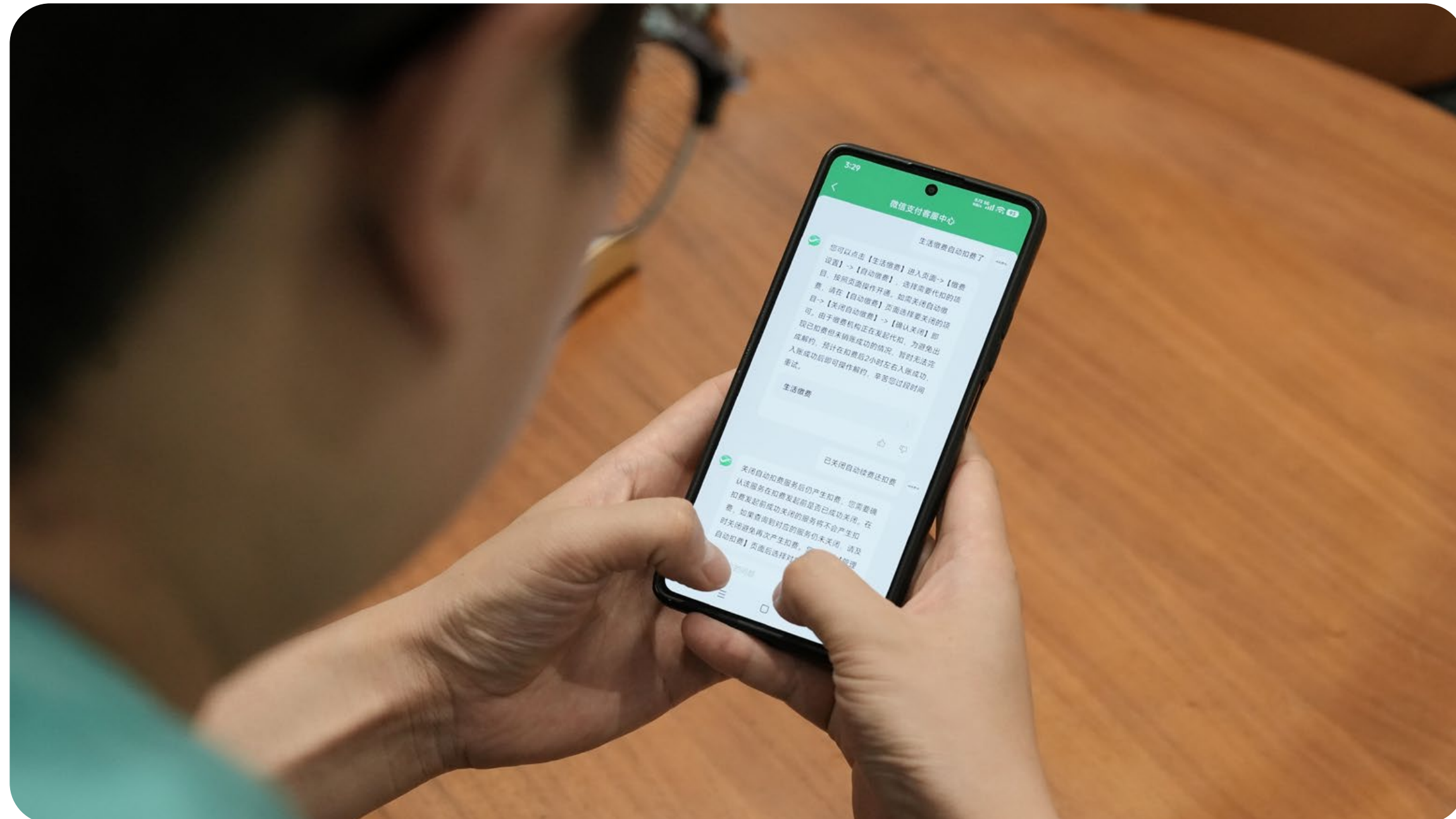
Customer Service

Consumer Internet

We operate a 24/7 customer service system, providing AI-supported self-service and human-managed professional support. Our system can handle inquiries and complaints in more than 20 languages and has established special channels for minor, senior and international users. In 2025, we opened our first dedicated in-person service centre for senior users in Chongqing, providing access to one-stop consultation desks, personal teach-ins and customised user guides.

In 2025, the customer service system was upgraded via the adoption of *Tencent HY*. Leveraging multimodal understanding, the system parses inquiries containing mixed text and images, improving issue identification and automated response accuracy. For complex issues requiring human intervention, the system employs AI Agents to autonomously orchestrate workflows, providing staff with real-time knowledge prompts and solution suggestions to enhance overall operational efficiency.

During the reporting period, the system handled a total of 186 million user complaints¹, and 99% of complaints were resolved within three working days.



1. The consumer Internet business customer service system handles all types of user feedback and reports. This includes feedback or complaints regarding Tencent-operated services and products, as well as reports of third-party content in suspected violation of community guidelines.

Industrial Internet

Our technology-driven support system serves enterprise clients, providing efficient technical services and operational support for global enterprises, organisations, and developers. Regarding process management, we have established a complaint early-warning and handling platform to ensure standardised control and operational efficiency. Our global technical team provides 24/7 rapid response through hotlines, online platforms, and dedicated service groups. Through the *Tencent Cloud Voice of Users* platform, we gather customer feedback. In 2025, we adopted 2,771 optimisation suggestions and completed 2,537 functional iterations, benefitting from our established improvement mechanism of "service-feedback-optimisation".

In 2025, the deep integration of AI enhanced diagnostic precision and response efficiency. The system can rapidly comprehend inquiries within complex business scenarios and generate standardised answers based on enterprise-specific knowledge bases, ensuring consistent service messaging and experience across all user interactions.

During the reporting period, the system handled a total of 10,561 complaints. Among these, cloud service clients achieved a five-star satisfaction rating of 96%, while large enterprise clients of *WeCom* recorded an average satisfaction rate of 96% in surveys.

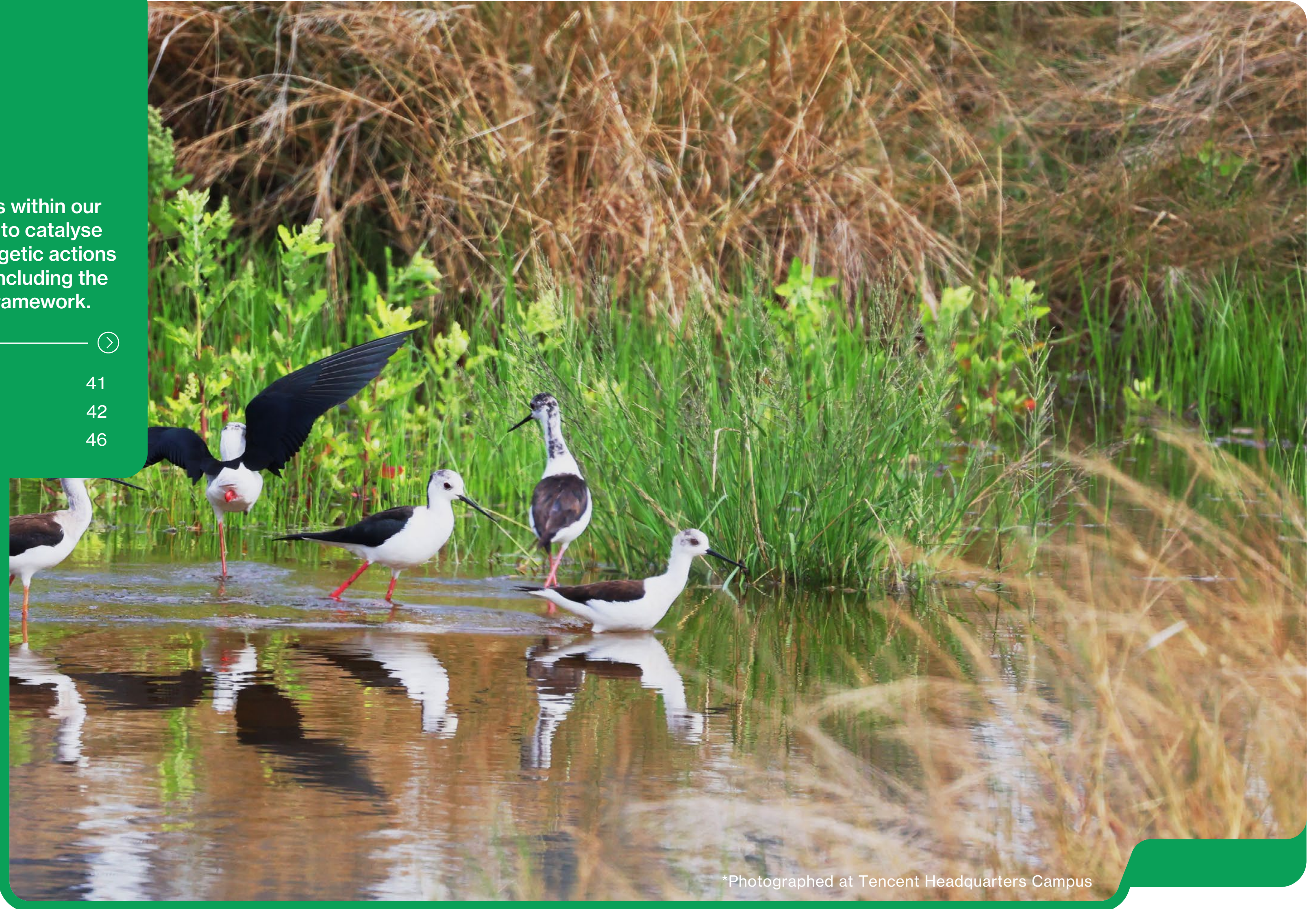


Environmental Protection

We implement carbon reduction and resource efficiency measures within our operations and supply chain, while leveraging our digital products to catalyse societal decarbonisation and biodiversity conservation. Our synergetic actions on climate and nature are aligned with international frameworks, including the Paris Agreement and the Kunming-Montreal Global Biodiversity Framework.



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*Photographed at Tencent Headquarters Campus



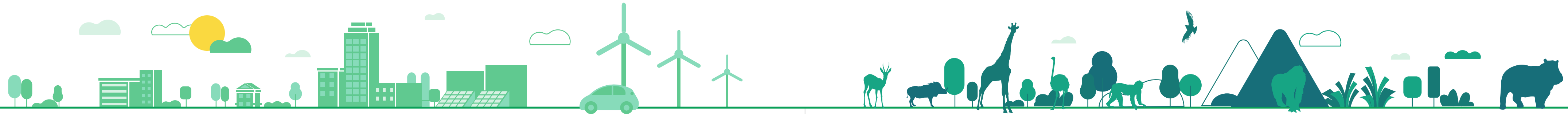
UNGC Environment Principles

Principle 7: Businesses should support a precautionary approach to environmental challenges;
Principle 8: undertake initiatives to promote greater environmental responsibility;
Principle 9: encourage the development and diffusion of environmentally friendly technologies.

4.1

Environmental Strategy and Progress

Tencent's environmental strategy focuses on synergistic actions to tackle climate change and safeguard biodiversity. Environmental oversight is embedded within the broader ESG governance framework. The Board's Corporate Governance Committee provides oversight, and the ESG Working Group manages performance and reporting. Endorsed by senior management, [Tencent Environmental Management Policy](#)¹ directs our employees in implementing environmental measures to fulfil our goals.



Climate

Commitment Carbon neutrality across our own operations and supply chain by 2030

Risk management Conducted climate scenario analysis to identify physical and transition risks, as well as emerging opportunities across our business model and value chain. Based on the assessment, we developed a climate transition plan and implemented appropriate measures to enhance climate risk response, mitigation, and adaptation capabilities

Targets and progress	Operational emissions reduction	Energy efficiency	Green electricity	Supply chain emissions reduction
Targets	By 2030, reduce absolute Scope 1 and 2 emissions by 70% from 2021 base year	The average Power Usage Effectiveness ("PUE") ² of owned data centres does not exceed 1.250	By 2030, achieve 100% green electricity consumption	By 2030, reduce absolute Scope 3 emissions by 30% from 2021 base year
Progress in 2025	Target is on track We reduced Scope 1 and 2 emissions by 2,399,814.9 tCO ₂ e through enhancement in energy efficiency and transition to green electricity	Target is achieved Average PUE of owned data centres was 1.246	Target is on track Proportion of green electricity ³ increased from 22.0% in 2024 to 48.5% in 2025	Target is on track We reduced Scope 3 emissions by 263,962.5 tCO ₂ e through promoting the use of green electricity in our supply chain

Advance green transition of society

- Leverage digital products to support industrial low-carbon transition and promote low-carbon lifestyles among the public
- Support innovative low-carbon technologies through CarbonX Programme, which provides over RMB100 million for climate technologies

Nature

Biodiversity Statement pledges to conserve vital ecosystems and advance a harmonious coexistence between humanity and nature

Conducted nature assessment in line with TNFD's Locate, Evaluate, Assess and Prepare ("LEAP") approach to identify and assess our nature-related dependencies, impacts, risks, and opportunities. The assessment results indicate that our nature-related dependencies, impacts, and risks are limited. We continue to undertake nature conservation actions

Waste management		Water management
Implement waste sorting in all owned office buildings in the Chinese Mainland	Ensure 100% of discarded lead-acid batteries are disposed of by qualified institutions	By 2025, reduce water consumption per employee in owned office buildings in the Chinese Mainland by 15% from 2019 base year
Implemented	Target is achieved	Target is achieved In 2025, water consumption per employee in owned office buildings in the Chinese Mainland decreased by 16% compared with 2019

- Develop AI-assisted species identification tools, enabling field researchers to increase data collection efficiency and accuracy
- Incorporate ecological content in online games to raise public awareness

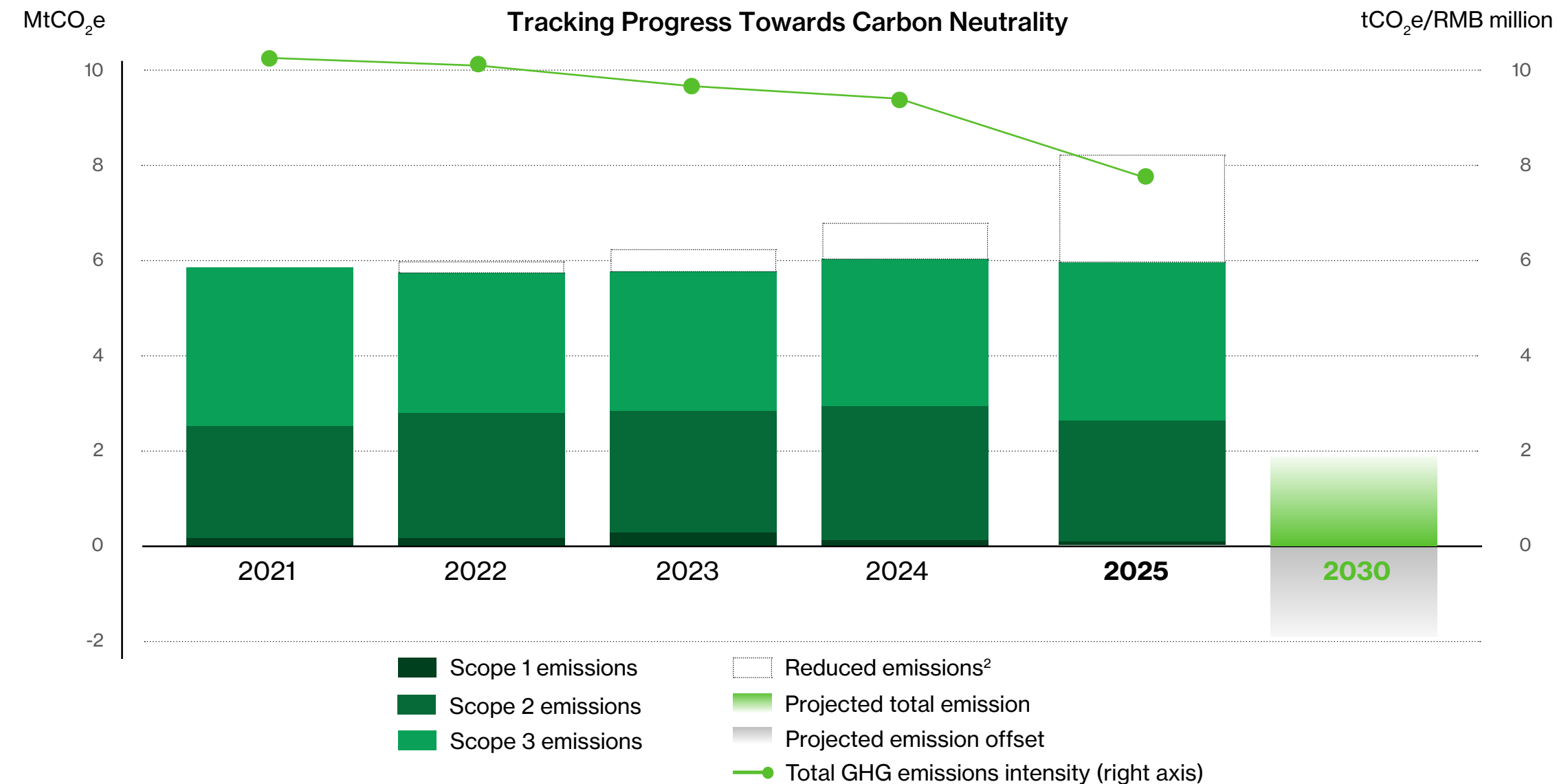
1. The policy requires compliance with applicable laws and regulations in the jurisdictions where we operate, including but not limited to the Environmental Protection Law of the People's Republic of China and the Energy Conservation Law of the People's Republic of China.
 2. The scope of PUE calculation includes all owned data centres that have been operating for more than 12 months.
 3. The green electricity used in 2025 included solar photovoltaic and wind power.

4.2

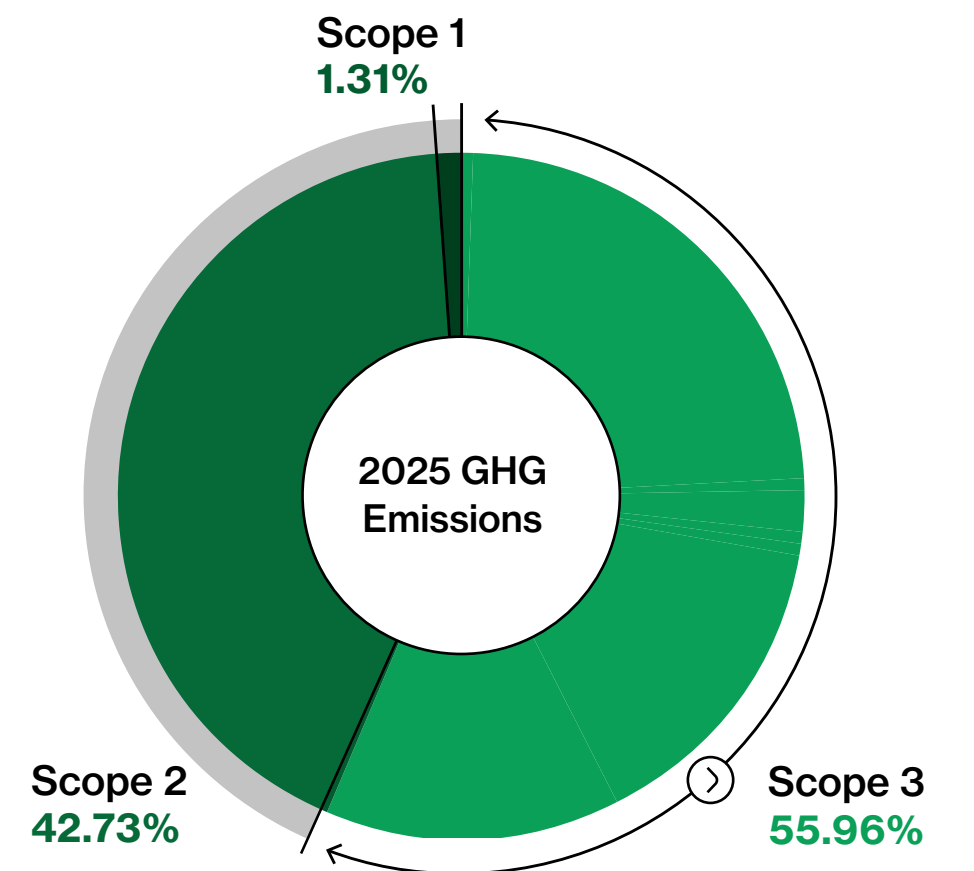
Climate Change and Carbon Neutrality

We support global climate action and China's carbon peaking and neutrality goals. Based on our climate scenario analysis and evaluation of key climate-related risks and opportunities, we have identified decarbonisation pathways, set emission reduction targets, and allocated resources to attain carbon neutrality by 2030. We also leverage our products, such as online games, Mini Programs, and cloud services, to support societal low-carbon transition.

An independent professional consultancy was engaged to assess our transition measures, and the results confirmed that we have taken appropriate initiatives to strengthen climate resilience and manage identified climate-related risks. We have accelerated the transition to green electricity, driven by AI adoption, and our carbon neutrality progress stays firmly on course. In 2025, we expanded our assessment to include the determination of an internal carbon price, the evaluation of climate-related financial effects, and the requirement to integrate climate-related factors into remuneration policy. The assessment supports our new target of using 100% green electricity in owned data centres by 2026, the adoption of an internal carbon price to inform decision-making, and a preliminary conclusion that climate change has not had a material effect on our financial position. Please refer to *Appendix – Climate- and Nature-related Information* in this report for more details.



In 2025, our carbon reduction targets remained on track, driven by enhanced energy efficiency, increased green electricity share and supply chain mitigation initiatives. Our total Scope 1, 2 and 3 greenhouse gas (GHG) emissions were 5,965,348.0 tCO₂e, with an emissions intensity of 7.9 tCO₂e per RMB million of revenue, representing a reduction of 24.4% compared to 2021 (base year).



Principle	Prioritise emission reductions and green electricity; supplement with offsets
Carbon neutrality	By 2030, achieve carbon neutrality in our own operations and supply chain
Absolute emissions	Scope 1 and Scope 2: By 2030, reduce absolute emissions by 70% from 2021 base year; Scope 3: by 2030, reduce absolute emissions by 30% from 2021 base year
Green electricity	By 2026, use 100% green electricity in owned data centres; by 2030, achieve 100% green electricity consumption
Net zero	By 2050, achieve net-zero emissions
Validation	Absolute emissions, green electricity, and net zero targets are validated by the Science Based Targets initiative ("SBTi")

1	Purchased goods and services	0.07%
2	Capital goods	24.50%
3	Fuel- and energy-related activities (not included in scope 1 or scope 2)	27.11%
4	Upstream transportation and distribution	0.37%
5	Waste generated in operations	0.01%
6	Business travel	3.95%
7	Employee commuting	1.06%
8	Upstream leased assets	42.86%
9	Downstream leased assets	0.07%

1. Our carbon targets are derived using the sectoral decarbonisation approach and cover all seven greenhouse gases defined by the Kyoto Protocol: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆), and nitrogen trifluoride (NF₃).
 2. Measures to reduce emissions include the annual use of green electricity and improvements in energy efficiency.

Green Data Centre

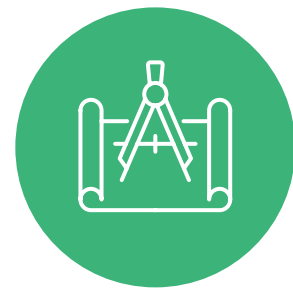
Building on the foundation of our fourth-generation data centres ("T-Block"), we adopted high-efficiency servers, power and cooling systems, and deployed an intelligent operations management platform to drive PUE enhancement. We increased the share of green electricity in current operations and prioritised its use to meet additional demand arising from our growing AI infrastructure, thereby accelerating green electricity transition. Through the high-efficiency operation of T-Block and the transition to green electricity, our GHG emissions in 2025 remained stable.



We factor physical climate risks into **site selection**, prioritising locations with suitable climates to reduce cooling energy consumption, while assessing long-term operational stability against risks including flooding and landslides. In 2025, the data centre we leased in Zhongwei City was selected based on its favourable temperature conditions and abundant renewable energy resources.



We continued to enhance PUE performance by improving the **energy efficiency** of our information technology equipment and supporting infrastructure. For equipment, we enhanced server energy efficiency through intelligent workload scheduling and frequency scaling, reducing energy consumption without compromising service performance. For infrastructure, we deployed indirect evaporative cooling systems, liquid cooling technologies and high-power-density power supply systems, saving approximately 18,260.0 MWh of electricity and reducing emissions by 10,413.7 tCO₂e this year. Our intelligent operations management platform used integrated sensors to monitor real-time operating data of equipment and infrastructure, including energy use, temperature, and humidity, while optimising these parameters to manage power consumption and carbon emissions. In 2025, we enhanced the PUE performance of our owned data centres from 1.257 in 2024 to 1.246.



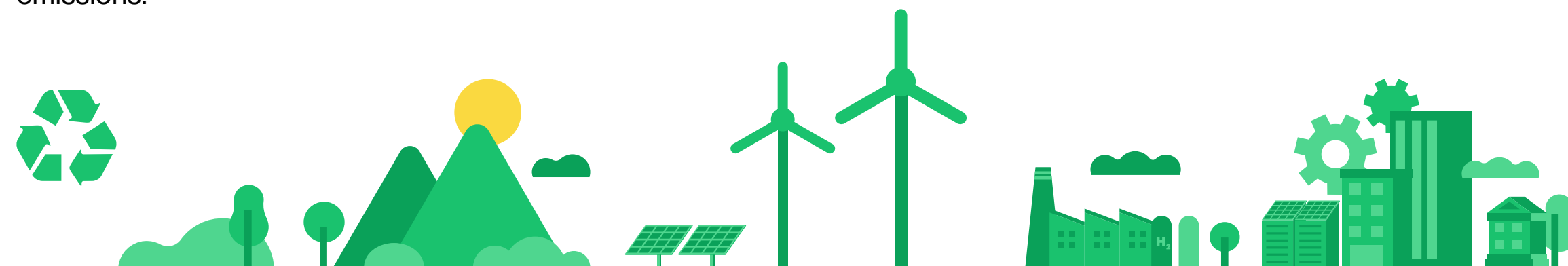
Prior to **construction**, we conduct environmental impact and energy efficiency assessments to evaluate potential impacts on soil, water, air, ecosystems, and energy use, and implement corresponding mitigation measures. During construction, we leveraged the modular features of T-Block technology to reduce construction time, costs, and carbon emissions.



Tencent Nanjing Data Centre Photovoltaic Facilities

Currently, the installed capacity of renewable energy facilities deployed at our owned data centres has reached 63.8 MW, including rooftop photovoltaic systems, building-integrated photovoltaics, and wind-solar-storage microgrids. We drive our **energy transition** through these on-site installations alongside green electricity procurement, including power purchase agreements and green energy certificates. In our green procurement strategy, we adhere to the principles of additionality, traceability, and proximity. The share of green electricity used in our owned data centres increased from 49.8% in 2024 to 82.9% in 2025.

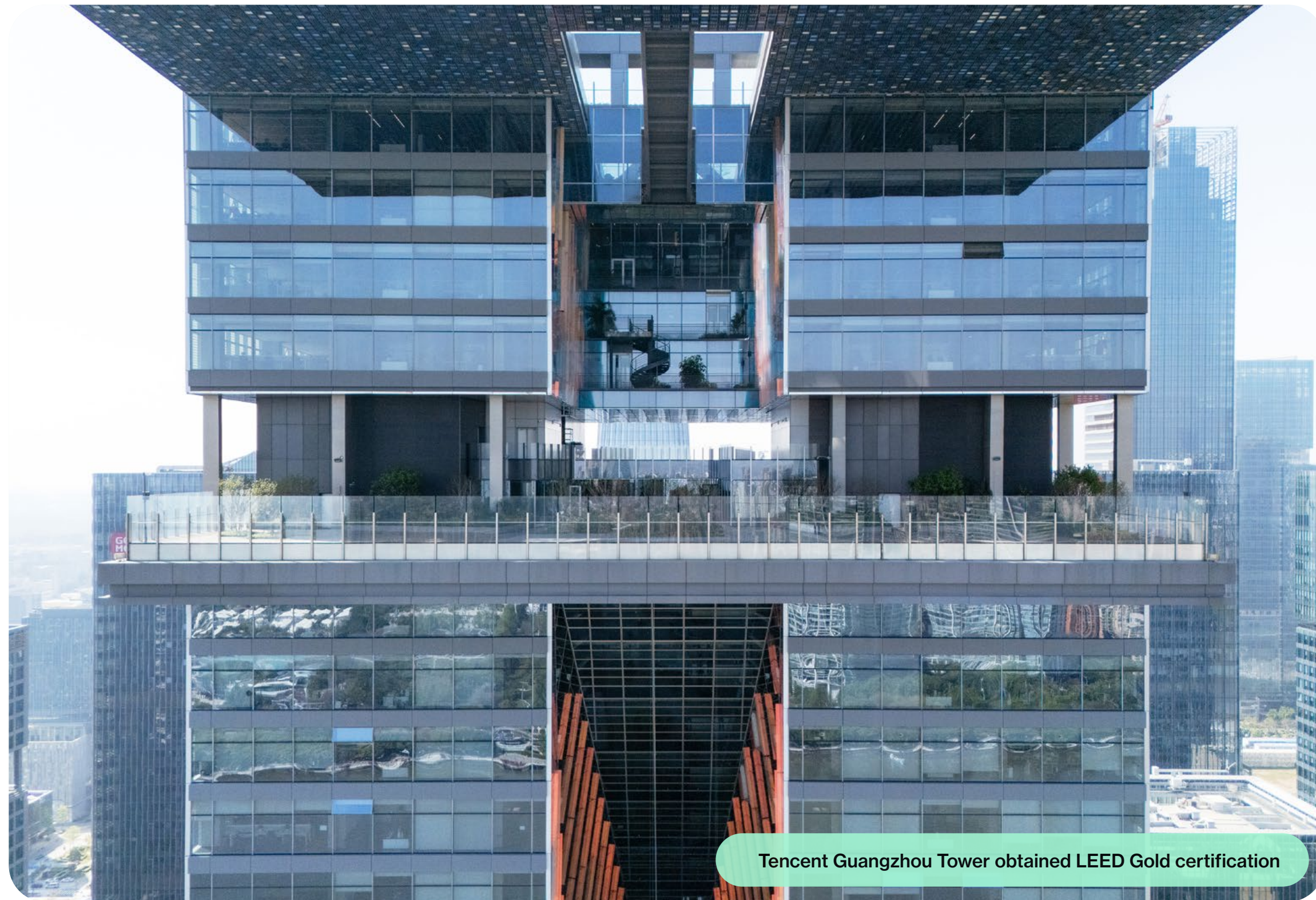
In **supply chain management**, we assisted leased data centres in accelerating their green electricity transition, building on our procurement experience. In 2025, the share of green electricity used in our leased data centres increased from 3.8% in 2024 to 21.4%.



Green Office

We consider energy efficiency and the use of renewable energy throughout the design and construction of our office buildings. At our new Tencent Headquarters Campus, we have installed power generation facilities using advanced photovoltaic materials¹ and low-wind-speed wind power generation system. Tencent Guangzhou Tower obtained LEED Gold certification in 2025.

In daily operations, we require building operators to hold ISO 9001, 14001, and 45001 certifications². We monitor and improve office building energy efficiency through a digital platform and conduct monthly assessments of building operators with incentives to drive energy savings. We enhance employees' awareness of green office practices through training and activities related to energy conservation, carbon reduction, water conservation, waste reduction, and biodiversity protection.



Tencent Guangzhou Tower obtained LEED Gold certification

1. Including perovskite and cadmium telluride photovoltaic technologies.

2. ISO 9001 Quality management systems, ISO 14001 Environmental management systems and ISO 45001 Occupational health and safety management systems.

Energy Saving Measures in Our Offices

Heating, ventilation and air conditioning



- Retrofitting equipment to improve efficiency
- Reducing the operating frequency of chilled water pumps during off-peak periods to reduce energy consumption
- Using smart switches to control air conditioners

Elevator



- Optimising passenger elevator operation management by shutting down excess elevators on rest days
- Reducing the operating hours of display screens and air conditioners based on actual needs

Lighting



- Using energy-efficient lighting including LED lighting
- Using motion sensor switches
- Implementing zone-based lighting control

Office equipment



- Procuring IT equipment and office appliances with energy-efficiency certifications
- Operate office equipment based on actual needs

These efforts helped us save 3,788.7 MWh of electricity, reducing emissions by 2,160.7 tCO₂e in 2025.

Supporting Low-Carbon Transition of Society

Tencent leverages our digital products and services to popularise low-carbon practices.

Tencent Maps launched an incentive programme that quantifies users' low-carbon journeys¹ and rewards them through a points-based system. Users can use their points to support ecological restoration projects, converting their low-carbon behaviours into tangible environmental benefits.

Online games raise public awareness of environmental protection through engaging and interactive experiences. For example, *Carbon Island* enables players to build an island that balances economic development with environmental protection while learning about carbon neutrality; *CrossFire: Legends* launched an in-game glacier conservation campaign and supported the construction of glacier monitoring stations; *Honour of Kings* introduced an in-game forest conservation campaign, which received the Trailblazer Award from the United Nations Environment Programme's Playing for the Planet Alliance.

Online collaboration tools help users minimise their environmental impact by reducing business travel, energy use and paper consumption. For example, *Tencent Meeting* reduces business travel through remote video collaboration and real-time screen sharing; *Tencent Docs* supports cloud-based storage and multi-user collaborative editing, reducing energy use associated with document transmission; *Tencent e-Sign* replaces paper-based document signing with electronic alternatives, including the substitution of paper logistics documents in the logistics sector. By the end of 2025, *Tencent e-Sign* had cumulatively avoided over 500,000 tonnes of carbon emissions.

We support the **digital upgrade of the real economy** by providing digital tools and solutions for enterprises in industries such as manufacturing and energy. For the retail sector, we reduce resource waste and logistics-related energy consumption through intelligent inventory management and demand forecasting.



Tencent has funded the construction of a glacier monitoring station in Urumqi, China

Incubating Low-Carbon Technologies

Through the **CarbonX Programme**, we support the incubation of innovative low-carbon technologies. Following the completion of Phase I, which focused on carbon capture, utilisation and storage technologies, we launched Phase II in 2025 to support carbon removal, industrial carbon capture, carbon utilisation and long-duration energy storage. Phase II extended globally and received more than 600 applications from 54 countries and regions. We will provide selected teams with total funding exceeding RMB100 million and support suitable projects in conducting pilot initiatives in climate-vulnerable regions.

We partnered with the United Nations Framework Convention on Climate Change, the United Nations Global Innovation Hub and the Global Enabling Sustainability Initiative to establish the **UN Solutions Hub** ("UNSH") for climate solutions in 2025. UNSH supports municipal authorities in connecting climate technology providers and financial institutions, facilitating the alignment of technologies and funding to help cities accelerate climate action.

In the area of **nature-based carbon sinks**, we collaborated with Xiamen University to restore salt marshes and seagrass beds and to advance research on blue carbon accounting and monitoring methodologies. The project has restored more than 60,000 square metres of seagrass beds in total and supported the inclusion of methodologies for salt marsh and seagrass carbon sinks into the China Certified Emission Reduction methodology framework.

1. Low-carbon journeys include cycling, public transport, the use of new energy vehicles, and car-sharing.

4.3

Biodiversity Loss and Nature Conservation

Our [Biodiversity Statement](#) pledges to conserve vital ecosystems and advance a harmonious coexistence between humanity and nature. The Statement aligns with the Kunming-Montreal Global Biodiversity Framework of the Convention on Biological Diversity, as well as China Biodiversity Conservation Strategy and Action Plan (2023–2030), and identifies three main areas of action:

- Developing our business in an eco-friendly way;
- Utilising technology to promote sustainable use and protection of the ecosystem;
- Utilising Internet technologies to raise public awareness.

Tencent's digital biodiversity conservation initiative was selected as one of the 2025 Exemplary Cases for Business Biodiversity Conservation by the Centre for Environmental Education and Communications of China's Ministry of Ecology and Environment.



Eco-Friendly Operations

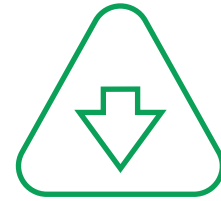
We conducted a nature-related assessment in line with the TNFD framework and its LEAP approach. The assessment indicates our nature-related dependencies, impacts, and risks are limited. In line with the principle of continuous improvement, we further strengthened water and waste management and implemented ecological retrofitting initiatives. For the assessment results, please refer to *Appendix – Climate- and Nature-related Information* in this report.

As part of the [water management](#), we have set a new target to improve the water usage effectiveness of our owned data centres by 20% by 2030 from 2025 base year. We focus on water conservation and recycling:

- Data centres use reclaimed water from wastewater treatment plants, where feasible, to replace freshwater for cooling. In regions facing water stress, we deploy waterless cooling systems. We improve the quality of cooling water for data centre air-conditioning systems through filtration, enhancing cooling efficiency. In 2025, the Water Usage Effectiveness (WUE) of our owned data centres was 1.50 L/kWh.
- We apply sponge city technologies in our office campuses, including the use of ceramic permeable paving and green roofs to collect, store and reuse rainwater. Concurrently, we adopt high-pressure cleaning and efficient irrigation tools to reduce daily water consumption.

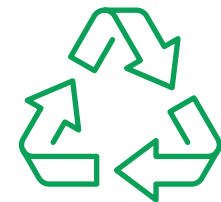


Our **waste management** practices follow the 3R principles. Through the implementation of the [Tencent Environmental Management Policy](#) and the Tencent Solid Waste Management Policy, we promote waste sorting and source reduction measures to minimise landfill disposal, and implement initiatives to heighten employee awareness in waste reduction.



Reduction

We promote paperless office operations, reduce food waste through clean plate initiatives, and avoid excessive packaging to prevent unnecessary waste.



Reuse

We prioritise internal reuse of end-of-life electronic products. We have invested in a refurbishment and reuse centre that supports the upgrade and refurbishment of IT equipment to prolong the lifecycle of our data centre servers. Furthermore, employees may apply to retain office electronic devices for personal use, including computers, after a certain usage period.



Recycling and resource utilisation

We sort waste and transfer it to third parties for recycling and resource recovery, minimising the amount of waste sent to landfill. We also collect employees' end-of-life electronic products, which are processed by third parties to recover metals, resins, and plastics.



Disposal

Waste that cannot be recycled through the methods above is transferred to qualified suppliers for lawful disposal, minimising environmental impact.

In 2025, we reduced electronic waste by 4,980.3 tonnes through the reuse of servers and office equipment and sent 759.9 tonnes of non-reusable electronic waste to qualified institutions for resource utilisation.

As part of our **ecological retrofitting**, a habitat garden was built at Tencent Binhai Tower. By providing food, water, and shelter, and by introducing a rainwater collection system and terraced shrub planting, we enriched biodiversity around the buildings and improved the local micro-climate. Through sharing these practices with our partners, we supported them in establishing five habitat gardens in Shenzhen, advancing urban biodiversity conservation. In 2025, we engaged employees to record species near our office buildings through *Wildlife Friends* Mini Program and partnered with professional institutions to conduct ecological surveys at our data centres.



*Photographed at Tencent Binhai Tower

Digital Technologies for Nature Conservation

Tencent provides innovative solutions for biodiversity conservation and ecosystem protection through cloud computing, AI, and Internet technologies.

In the **agricultural sector**, we collaborated with the National Crop Genebank of China, Chinese Academy of Agricultural Sciences to establish a digital Genebank, enabling the storage, analysis, utilisation and sharing of germplasm information. In saline-alkali regions facing water scarcity, we worked with partners to develop smart greenhouses and provide training to farmers. These greenhouses apply cloud computing, intelligent equipment and soilless cultivation systems to enable efficient and automated water and nutrient management.

In **species conservation** and public engagement, we developed a digital platform for species identification that is offered free of charge to field researchers to increase the efficiency and accuracy of data collection and analysis. Since its launch in China in 2021, the platform has expanded its scope from snow leopards to 286 species. In 2025, the platform was deployed for the first time in Nepal, supporting local conservation efforts. Additionally, users can upload bird photographs and observation records through *WeBirder* Mini Program, providing data to support migratory bird research. Users may also use the *Wildlife Friends* Mini Program, powered by *Tencent HY*, to rapidly identify species information from uploaded photographs.

As part of our **platform governance**, Tencent explicitly prohibits any illegal trade and marketing of wildlife on our platforms. This requirement is incorporated into user agreements and relevant platform policies. Regular inspections are conducted, and any non-compliant content and accounts are promptly addressed. In daily operations, we apply algorithms such as natural language processing and graph analytics to identify suspicious cases and support law enforcement authorities in combating the illegal trade of wildlife and related products.

Raising Public Awareness

We embed environmental protection concepts into games through interactive experiences to raise users' awareness of ecological conservation. For example, *Honour of Kings China Server* introduced in-game ecological tasks that enable players to participate in wildlife identification activities; *PUBG MOBILE* launched an in-game penguin conservation campaign and supported habitat restoration projects through donations; and *Peacekeeper Elite* incorporated ocean waste management tasks into gameplay and supported an on-site beach clean-up programme.



Caring for Our People

Tencent prioritises talent acquisition and cultivation, safeguarding employee rights and well-being while maintaining a steadfast commitment to talent development within a dynamic market environment. By fostering a diverse and inclusive workplace, we unleash the creativity and potential of our people, driving the mutual fulfilment of individual growth and corporate strategic goals.

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UNGC Human Rights Principles

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights;
Principle 2: make sure that they are not complicit in human rights abuses;

UNGC Labour Principles

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
Principle 4: the elimination of all forms of forced and compulsory labour;
Principle 5: the effective abolition of child labour;
Principle 6: the elimination of discrimination in respect of employment and occupation.

5.1

Our Approach and Commitments

At Tencent, we regard our people as our core assets. We firmly believe that the Company's sustainable development and long-term competitiveness stem from the vitality, competencies, and diverse backgrounds of our people. We uphold and safeguard employee rights through the implementation of fair and transparent recruitment, multi-track career development, performance-based remuneration, employee care programmes, and robust feedback channels.

We are committed to protecting employees' lawful rights and interests throughout recruitment and employment. Our employees shall have equal access to legal entitlements, including remuneration, rest periods and leave, occupational health and safety protection, social insurance and benefits, as well as the right to participate in trade union activities. In line with relevant laws, regulations and international standards, we safeguard employees' rights to freedom of association and collective bargaining. We also maintain reasonable working hours, implement performance-based and fair remuneration system, ensure employee pay is sufficient to meet local basic living needs, and provide statutory benefits such as paid annual leave.

We comply with applicable labour laws and regulations in the jurisdictions where we operate, including but not limited to, the Labour Law of the People's Republic of China, the Work Safety Law of the People's Republic of China, and the Law of the People's Republic of China on the Prevention and Control of Occupational Diseases. We also abide by international rules and standards, including the Ten Principles of the UNGC, the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Convention on the Elimination of All Forms of Discrimination against Women, and the Convention on the Rights of Persons with Disabilities. Tencent prohibits all forms of child labour and forced labour, and opposes all forms of human trafficking, including illegal means such as threat or use of force or other forms of coercion, abduction, fraud, or deception. Tencent has never employed any child labour and has not had any incidents of forced labour or human trafficking.

Our progress in 2025:

- Overall employee engagement increased by **2.9 percentage points**, and employee satisfaction rose by **3.8 percentage points** compared with 2024;
- Employees expressed the highest satisfaction with the diversity, corporate values, and employee benefits;
- Females comprised **32.7%** of the total workforce. Across all management levels, female representation reached **26.8%**. Within which, females in junior management was **26.9%** and in senior management was **8.6%**.



Tencent's anniversary celebrations in 2025

Major awards received in 2025 include:

- Forbes World's Best Employers 2025
- Zhaopin's **Top 1** Most Popular Employer Among University Students 2025
- Zhaopin's **Top 10** Best Employers Award 2025
- 2025-2026 Great Place To Work® Certification™ (USA, UK, Singapore, and Japan offices)

5.2

Development and Well-being of Our People

Tencent supports employee development and well-being across the full employment lifecycle – from talent attraction and recruitment to training, career advancement, incentives, health and safety, and comprehensive benefits. Through abundant training resources and management development plans, we help employees build professional skills and grow at all stages. We provide a safe, healthy, and comfortable workplace, along with a welfare system that promotes work-life balance for employees and their families. Furthermore, we value employee input, gathering feedback through multiple channels to continually improve how we manage and operate.



Recruitment

We recruit talents through multiple channels, including campus and experienced hires, internship programmes, and employee referrals. These efforts aim to attract talents from diverse backgrounds and provide them with ample opportunities to pursue their development paths.

We advocate the talent selection philosophy of Equity and Respect, Focus on the Core, guiding interviewers to prioritise candidates' professional skills and growth potential, set aside biases and labels, and recognise the value that individual differences bring. We provide mandatory training to our interviewers and rigorously screen, certify, and assess their capabilities. In 2025, we added case studies in the training to strengthen their understanding of acceptable conduct. We also collect and analyse candidate interview feedback and promptly share it with interviewers and managers.

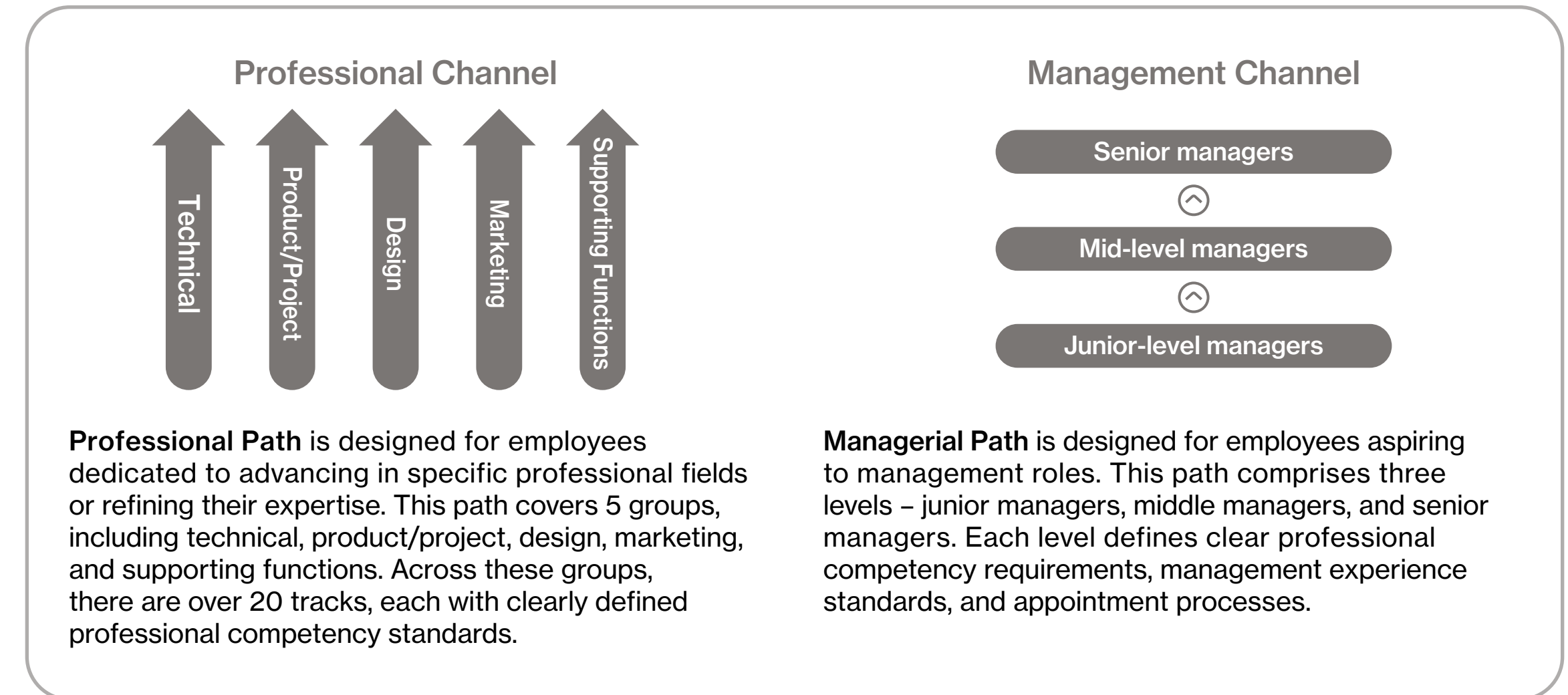
As our businesses grow, we have expanded recruitment for technical positions including AI, big data, cloud computing, and game engines. In 2025, technical positions constituted over 60% of our overall intake. Looking ahead, we are creating 28,000 internship positions over the next three years and will expand conversion to full-time roles, covering five categories: technical, product, design, marketing, and functional positions.

We support the inclusion and development of women in the technology sector. In 2025, we hosted in-person salons for female university students, where accomplished female colleagues shared their career experiences and engaged with students. These events were organised during our campus and internship recruitment drives.

Project Up, launched by Tencent in 2023, aims to further attract top global tech talent. This project offers competitive remuneration, personalised development plans, and opportunities to deeply engage in cutting-edge technology projects and core business operations, with leading technical experts and distinguished scientists acting as mentors or advisers.

Career Development

We provide a Dual-Path Career Development System, consisting of a professional path and a managerial path, to support employees in developing their careers based on their interests and expertise. We have implemented Tencent Employee Career Development Management Measures to ensure our people have ample room for growth and access to advice and evaluation criteria relating to career growth.



In addition, we have introduced a fast-track and special nomination process to recognise and advance high-performing employees. Greater investment has been directed toward developing high-potential young talent and reinforcing the talent pipeline, with hands-on opportunities, personalised coaching, and regular talent assessments in place to foster the solid growth of emerging talent.

We facilitate internal transfers through Huoshui Programme ("HSP") and job rotation schemes. In 2025, we further lowered the eligibility criteria for the HSP by removing performance-based restrictions. These initiatives broaden employees' career experiences and skill sets while bringing diverse perspectives and vitality to the organisation. In cases where resource optimisation is necessary due to business realignment or in response to market changes, we will minimise the impact on employees through proactive communication and support measures – including a transition period, the HSP, and appropriate compensation – to help employees transition smoothly and adapt to change.

Employee Development System

Tencent Academy is our internal learning platform that provides diverse learning resources and channels to support new hires, professionals, and managers in enhancing their personal and professional skills at various stages of their careers. We also collaborate with academic institutions and other partners to bring in high-quality resources, broadening employees' knowledge and perspectives. In addition, we provide learning resources and engagement platforms for external stakeholders such as enterprises, value chain partners, non-profit organisations, higher education institutions, and youth, and share our business insights and know-how, thereby promoting talent development in the industry.

In 2025, we enhanced content across multiple domains with an expanded focus on AI as follows:

- Added over 1,900 new courses to support employees in broadening their horizons and refining their skill models. A key highlight this year was our suite of AI-focused curricula, including generative AI, AI agents, AI product boot camps, and hands-on training in AI-assisted programming. These initiatives are designed to help employees upgrade their capability profiles to effectively navigate rapid technological shifts.
- Launched the AI assistant *Classmate Q*, enabling employees to access and query multiple internal knowledge bases via online dialogue to retrieve professional information, generate course summaries, and customise personal learning plans.

We believe that capturing insights and sharing knowledge in daily work are key drivers of professional growth. We encourage employees to transform their hands-on business experience into case studies and share them across internal platforms, such as Tencent Profession magazine, *Q-Learning* platform and the *Knowledge Management* platform, to facilitate interaction and learning. In addition, we run recognition initiatives to encourage broader participation in knowledge codification and sharing.

Training and Coaching New Hires

New employee training comprises three modules: Tencent fundamentals, professional expertise and skills, and workplace competencies. For campus hires, we host a week-long orientation camp designed to equip them with the essential professional and workplace skills. For experienced hires, we provide a three-day programme prioritising business understanding and cultural integration. Each business group also develops role-specific training tailored to its operational requirements. Networking opportunities are organised for new employees, including monthly themed sessions, periodic Tencent Talent Interview, and annual gathering for new hires.

We assign mentors to new employees to support their integration into the team. Our Mentoring System for Tencent New Hires covers the following key stages:

Pre-onboarding

Mentors contact new hires prior to their start date to support onboarding preparations.

Post-onboarding

Mentors and employees develop a coaching plan aligned with role requirements and career development objectives.

Coaching period

Regular communication is maintained, with mentors providing ongoing guidance to support employees in developing their workplace skills.

New Hire Training Curriculum and Programmes

- Pre-job orientation
- Orientation for experienced hires
- Orientation for fresh graduates
- Training for interns
- Job-specific training for new hires
- Mandatory online course series for new hires
- New Tencenters Gathering
- New Tencenters Growth Handbook



Annual Gathering for New Campus Hires in 2025

Professional Development

In addition to general skills development courses, we also provide employees with learning resources tailored to their professional fields, job levels, and roles. Employees are encouraged to select courses and learning methods that align with their personal interests, needs, and stages of career development.

Upskilling Curriculum



Engineers

Courses covering front-end and back-end development, architecture design, testing, technical operations, security, emerging technology research, and technical efficiency enhancement.



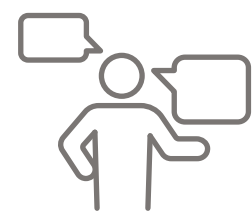
Product/Project managers

Courses covering product mindset, competitive analysis, industry trends, and project management skills development.



Designers

Courses covering AI for design, 2D/3D design, visual design, and art design for games.



Sales, strategy, marketing and PR specialists

Courses covering sales etiquette, B2B services, industry research, and strategies.



Specialists in human resources, administration, finance, and legal functions

Courses covering risk management, organisational talent development, and compliance.

Upskilling Programmes and Events

Diversified skills development

Better Me, Know the Business

Collaborative learning initiatives

Expert Platform, Team Co-learning, AI Knowledge Challenge

Professional exchange forums

Technology Week, Design Week

Themed training programmes

Product Manager Trainees, AI Productivity Enhancement Bootcamp, Project Up Training



The 8th Tencent Technology Week

Leadership Development

We have implemented a range of initiatives to strengthen leadership across all management levels, while identifying and nurturing high-potential talent to build a robust leadership pipeline. Rooted in Tencent's corporate values of Integrity, Proactivity, Collaboration, and Creativity, the "All in Leadership" model defines three core capabilities for managers: Insight, Inspire, and Win, providing a clear and structured framework for leadership development.



Version 3.0 of Corporate Values
(Integrity, Proactivity, Collaboration, Creativity)
"All in Leadership" Model

Built upon this framework, we developed leadership training and programmes to bolster their core capabilities. The training caters to high-potential talents and managers at several stages of career development and is delivered through both online and offline sessions. Online learning focuses on theoretical foundations, while offline sessions emphasise in-depth discussions and practical drills. For example, the Qianlong Programme is designed for junior managers, while the Feilong Programme is tailored for middle managers.

In addition, the Leadership Assessment Centre conducts a comprehensive evaluation of each participant in the Feilong Programme, helping them gain a deeper understanding of corporate expectations and requirements, while identifying their strengths and areas for improvement. Based on the assessment results, the participant's line manager and the Human Resources department will tailor a development plan to support them in becoming key leaders capable of driving team excellence.

Over 19 years of continuous improvement, the Qianlong Programme has trained over **10,000** employees, creating a pipeline to fill **80%** of managerial positions to date, while the Feilong Programme has groomed more than **790** junior managers for advancement to middle managers, contributing to more than **67%** of incumbent middle and senior managers.

Leadership Training Curriculum

- Elective courses for team leaders
- Elective courses for directors
- Elective courses for middle management

Leadership Training Programmes

- Future leadership development: Yulong Programme, Qianlong Programme
- Directors' development: Yuelong Programme, Feilong Programme
- Middle leadership development: New middle management training



Participants of the 2025 Feilong Programme sharing reflections after the desert trek

Performance Review, Remuneration and Incentives

We prioritise fairness in performance management and total remuneration and incentives, combining performance evaluation with multi-dimensional feedback to ensure each employee's value creation aligns with their rewards.

Performance Review

Under Tencent Individual Performance Management Measures, employee performance is assessed primarily based on goal attainment and value contribution twice a year. For certain key business units, team performance assessments include related social value indicators, reflecting our Tech for Good mission.

Process

Target Setting

The team establishes its Objectives and Key Results (OKRs), and each team member develops individual OKRs that align with team goals.

- Line managers share team goals to members
- Team members set individual performance targets
- Mutual agreement between line managers and members

Tracking and Coaching

Line managers review progress and communicate with team members regularly and provide coaching.

- Line managers provide resources and coaching to support members to achieve their goals
- Conduct performance review
- Confirm and, if necessary, adjust performance targets

Assessment and Feedback

Line managers, peers, and subordinates provide multi-dimensional feedback.

- Comprehensive feedback and self-appraisal
- Appraisals by the line manager and the department
- Appraisals by the business group
- Members receive feedback
- Performance appeal, if necessary

Improvement and Development

Line managers conduct review meetings with members and discuss enhancement plans to support their career growth.

- Review meetings
- Formulate personal development plans and goals

Appeal

Employees may submit an appeal regarding their performance evaluation results in accordance with the performance appeal process, through the designated platform or email channel. The relevant department will review the case as appropriate and, where necessary, form an investigation team to verify the matter and ensure proper handling.

Remuneration and Incentives

We conduct salary surveys¹ regularly to ensure our employees receive competitive remuneration, and track living wage levels globally to benchmark remuneration above local living wage standards. We operate a performance-based incentive system, where we allocate bonuses based on performance reviews. For long-term incentives, our employee share award scheme benefits employees who make outstanding contributions to our core products, platforms, or technologies.



1. The salary survey comprises an analysis of employees' living wages. During the reporting period, the salary level of Tencent employees surpassed the local living wage benchmark established by the Global Living Wage Coalition ("GLWC").

Employee Care and Benefits Programmes

We have developed a comprehensive welfare system that provides statutory benefits in compliance with local laws, regulations and policies, along with additional benefits that employees can choose based on their needs. This system encompasses physical and mental well-being, financial wellness, family and personal life, and support for women. It aims to support employees' physical and mental well-being, alleviate financial pressures, and enhance overall happiness, enabling employees to achieve a better work-life balance.

Physical and Mental Well-being



We prioritise the physical and mental well-being of our employees. In terms of physical health, in addition to statutory medical insurance, we provide annual health check-ups, health consultation services, physiotherapy services, and other benefits. In terms of mental health, we provide third-party professional psychological assessments, psychological consultations, and mindfulness learning resources.

Statutory Benefits

- Basic medical insurance
- Paid annual leave
- Medical leave

Additional Benefits

Physical Health

- 30 days of fully paid sick leave
- Supplementary commercial medical insurance
- Critical illness insurance
- Long-term health insurance
- Personal accident and life insurance
- Survivor benefits
- Health consultation services
- Physiotherapy services
- 24-hour online family doctor service
- Fast-track access for serious illness
- Annual health check-up with report consultation
- Access to sports and fitness facilities and classes

Mental Health

- One-to-one counselling sessions
- Annual mental health assessment, with personalised and confidential assessment report provided by third-party professional organisation
- Mindfulness practice resources
- Mental health education for newly-appointed junior managers
- Cultural and sports club activities

Financial Well-being



In addition to statutory insurance contributions, we provide a broader range of commercial insurance options. Tencent Anju Plan offers interest-free loans to eligible permanent employees purchasing their first home. As of the end of 2025, the plan benefited over 16,000 employees.

Statutory Benefits

- Pension insurance
- Unemployment insurance
- Work-related injury insurance
- Maternity insurance
- Housing provident fund

Additional Benefits

- Emergency financial assistance loans
- Tencent Anju plan
- Affordable housing/rental subsidies
- Customised insurance plans for employees' spouses, children, and parents
- Long-term service benefits and retirement recognition for veteran employees

Family-Centric Care



We provide holidays and celebratory gifts to employees for significant life milestones. We also deliver festive gifts to employees and their families.

Statutory Benefits¹

- Paid annual leave
- Marriage leave
- Maternity leave/miscarriage leave
- Paternity leave
- Childcare leave
- Breastfeeding leave
- Parental care leave

Additional Benefits

- Special leave for the Spring Festival
- Half-paid personal leave
- Bereavement leave
- Newly-married employees: wedding gifts and wedding figurines
- Cash gifts for employees' newborns
- Family insurance, Children's Day gifts, Senior Citizens Day gifts, 24-hour online family doctor consultation, and psychological counselling services for employees' families

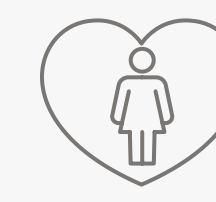
Other Benefits



We offer flexible working hours and provide shuttle bus services, and breakfasts and dinners, for free to employees. We also provide volunteer service leave and farm-sourced gifts aimed at supporting farmers and rural communities, encouraging employees to participate in community service and embrace our mission of Tech for Good.

- Free shuttle bus services
- Free breakfast and dinner for employees
- Flexible working hours
- Ergonomic office equipment
- Festival gifts
- Work anniversary gifts
- Farm-sourced gifts aimed at supporting farmers and rural communities
- Tencent-branded merchandise
- Volunteer leave
- Long service leave

Caring for Female Employees



In addition to the above statutory benefits and additional benefits, we provide facilities and support measures for female employees to foster an inclusive work environment.

- Nursing rooms
- Fully-paid pre-natal examination leave
- Priority seating on shuttle buses and designated meal collection channels for pregnant employees

1. We provide statutory leave benefits in accordance with the laws and regulations applicable to the location where employees register for their social insurance. For example, marriage leave ranges from 3 to 20 days, maternity leave from 158 to 188 days, paternity leave from 10 to 20 days, and parental care leave from 5 to 10 days, for employees in the Chinese Mainland. Specific number of days is determined by local regulations.

Employee Communication Channels

We maintain open and timely dialogue with our employees through multiple communication channels, facilitating the exchange of feedback and key information to continually enhance organisational transparency and employee engagement.

Senior Management-Employee Engagement

Our senior management regularly holds internal communication sessions to inform corporate strategies and management decisions. The formats include the annual LinkTime, all-hands meetings, strategy conference, and themed exchange events. LinkTime is a key component of Tencent's anniversary celebrations, where all senior executives attend in person and through live broadcast to address questions on development strategy, management culture, and employee concerns.



2025 LinkTime Event

Internal Exchange Forums

We encourage employees to express their views and provide suggestions through various internal platforms. Among them, *Lewen* serves as a major Q&A and discussion forum where employees can post questions anonymously or with their names and engage in open discussions on topics including company strategy, management and culture, product suggestions, experience sharing and daily life.

Employee Engagement and Satisfaction Survey

We commission an independent third-party organisation to conduct an annual employee survey anonymously. This survey aims to assess employees' level of engagement, motivation, and willingness to stay, and overall workplace sentiments. The survey explores key dimensions including professional fulfilment, stress level, teamwork, job support, and perceptions of corporate strategy and organisational vitality and diversity. In 2025, the valid response rate of the survey was 94.9%. Employees expressed the highest satisfaction with diversity, corporate values and employee benefits. More than 40,000 suggestions were collected through open-ended section of the survey and will be analysed to draw insights for management improvement.

Grievance and Reporting Mechanisms

We promote integrity as a core value for our employees and have enshrined this principle in the Sunshine Code of Conduct. The Code sets out clear standards of behaviour expected of our employees and other relevant stakeholders and provides formal channels for reporting suspected misconduct. Employees may report any violations, including but not limited to, sexual harassment, fraud, corruption and conflicts of interest, through the following channels. The responsible departments will review and handle such cases in accordance with defined procedures.



Ruixue refers to Tencent's employee conduct code. Employees may report instances of uncivil behaviour in the workplace through *Ruixue Daxia* WeCom account. Substantiated reports will lead to counselling for the employee involved. In severe cases, disciplinary actions will be taken, including company-wide disciplinary notice or escalation through appropriate channels for further action.



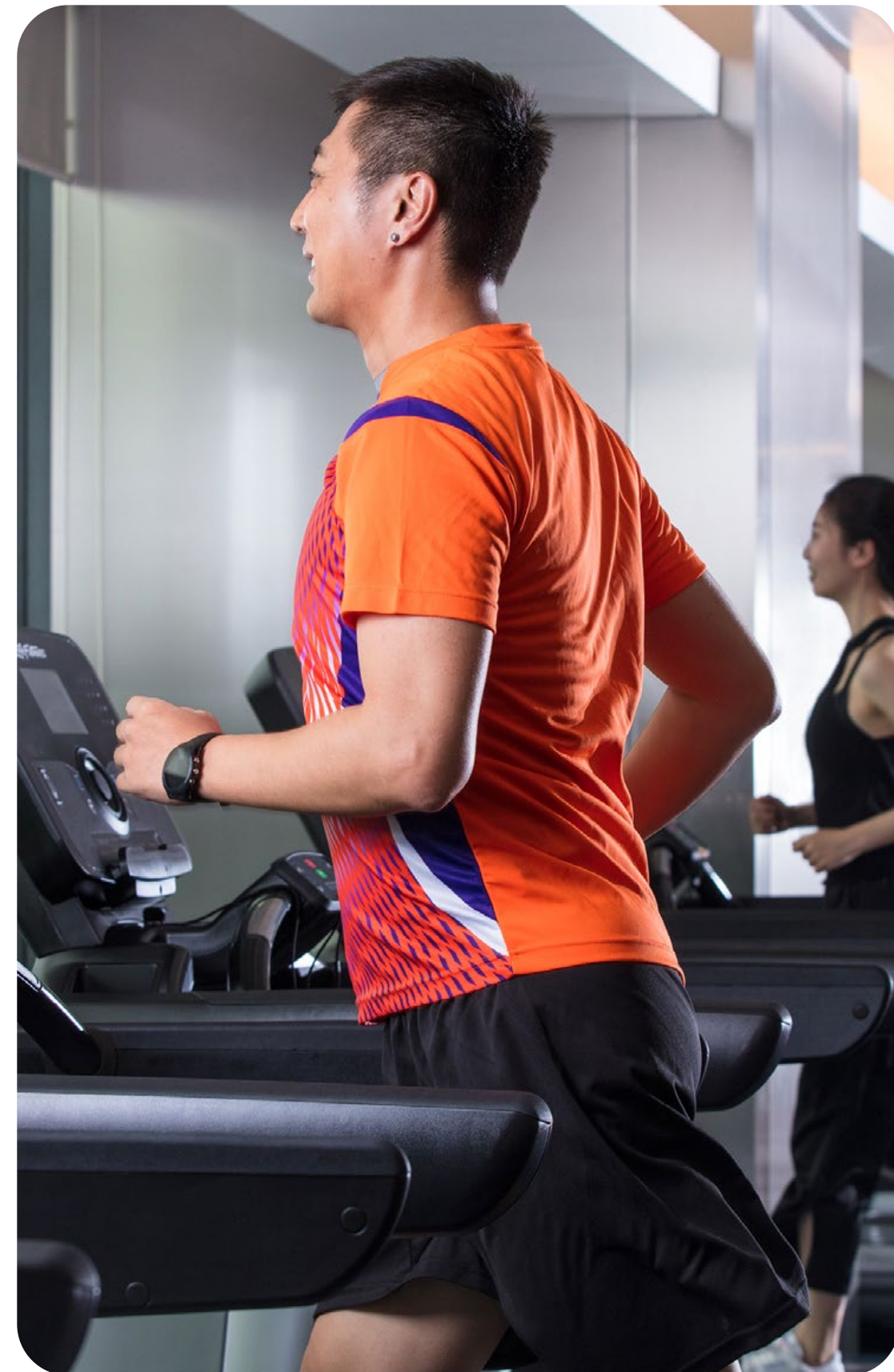
Employee Grievance Channel is established to collect formal objections relating to probation, performance assessments, separation procedures, or alleged misconduct by managers. Employees may follow the defined procedures to submit an appeal, with cases escalated through the next-level supervisor, the human resources department, or a designated investigation team, as appropriate.



The **Anti-Fraud Reporting Channel** allows employees to report suspected violations either anonymously or on a named basis. The Anti-Fraud Investigation Department conducts independent investigations into such reports, protects the confidentiality of whistleblowers' personal information, and prohibits any forms of retaliation. For more details, please refer to the *Business Ethics – Adherence to Integrity Practice* section in this report.

Occupational Health and Safety

Tencent's Workplace Health and Safety Policy is implemented in accordance with applicable laws and regulations in the jurisdictions where we operate¹. It applies to all employees and relevant personnel in our workplaces and covers four areas: occupational safety, work environment, health management and emergency response.



Occupational Safety

We employ a comprehensive management system to ensure thorough safety oversight and management across all workplaces, thereby minimising potential hazards.

Work Environment

We define specifications for a healthy work environment, addressing factors including noise, lighting, air quality, and temperature to safeguard employees' health and enhance their comfort. We specify safety standards and inspection and maintenance cycles for facilities, equipment, furniture and materials, and ensure that design and use comply with ergonomic principles.

Health Management

We care about our employees' physical and mental well-being. In addition to providing exercise spaces at our offices, more than 100 cultural and sports clubs organise periodic activities. We also provide healthy meal options, physical and mental health check-ups, and medical support services for employees.

Emergency Response

We have established an emergency response mechanism for disasters and accidents, featuring regular training and drills to enhance emergency management preparedness. Our emergency response management system integrates advanced hardware and software components and is equipped with automated external defibrillators ("AED"). This enables rapid connection to on-site support, first responders, and external medical institutions, providing timely assistance in critical situations.

Tencent's Occupational Health and Safety Committee applies the Plan-Do-Check-Act cycle to continuously improve management performance in occupational safety, work environment, health, and emergency response through measurable objectives, action plans, and annual reviews. We also collect employee feedback on the safety and comfort of the workplace through *Lewen* platform and incorporate validated input into ongoing improvement initiatives.

All property management providers for all Tencent office buildings are certified to the ISO 45001 Occupational health and safety management systems, ISO 9001 Quality management systems, and ISO 14001 Environmental management systems.



1. Including but not limited to the Work Safety Law of the People's Republic of China, the Fire Protection Law of the People's Republic of China, and the Law of the People's Republic of China on the Prevention and Control of Occupational Diseases.

5.3

Diverse, Inclusive, and Collaborative Workplace

Collaboration and creativity are core to our corporate values. We embrace these principles to foster a vibrant work environment that inspires individual creativity and strengthens team collaboration.

We respect diversity across age, gender, race, ethnicity, nationality, national origin, physical condition, marital status, family status, religious beliefs, cultural and educational background, and professional experience.

By supporting our people in leveraging their strengths throughout recruitment, remuneration, and promotion, we ensure that every individual has fair opportunities and receives equitable treatment.



Management Approach

In 2023, Tencent released [Our Commitment to Diversity, Equity and Inclusion](#), pledging to create a respectful, supportive and inspiring work environment while affirming our zero-tolerance for discrimination. In the same year, we signed the Women's Empowerment Principles, jointly launched by UN Women and UNGC, further demonstrating our commitment to promoting gender equity and women's empowerment in the workplace, marketplace, and community.

The senior executive management team has defined the direction of diverse and inclusive corporate culture and values, while the Board tracks progress through the Corporate Governance Committee. The Diversity and Inclusion Special Committee and a Joint Project Group are tasked with implementing and executing initiatives to promote awareness, training and advancement of these values. In 2024, we upgraded our talent selection philosophy to Equity and Respect, Focus on the Core, and it has been integrated into certification, training, and code of conduct for interviewers. We regularly track key metrics and evaluate the effectiveness of these plans in promoting a diverse, inclusive, and collaborative workplace. We also publish regular internal diversity data dashboards to help managers monitor progress.

Practices in Diversity and Inclusion

We have established fair and equitable mechanisms across key areas including recruitment, remuneration and welfare, training, and promotion, integrating the principles of diversity, inclusion and collaboration into our policies and daily operations.

We broaden our global candidate pool and embrace the talent selection philosophy, Equity and Respect, Focus on the Core, which we have integrated into the certification, training and the code of conduct of interviewers.

Through training, campaigns and diverse initiatives, we promote a positive understanding of diversity and inclusion among our employees, building a congenial, creative and collaborative workplace. As our business expands globally, we fully recognise the importance of cross-cultural communication. In 2025, we organised a variety of events across our global offices to celebrate International Women's Day. We continue to host our Global Cultural Festival, which features a series of sharing and celebratory events that deepen employees' respect and understanding of diverse cultures through cross-cultural exchange. During the 2025 Tencent ESG Culture Week, we hosted a session on diversity, inclusion and accessibility. Practitioners from within Tencent and across society, who are committed to advancing diversity and inclusion, were invited to exchange insights and share their experiences across five key themes: age-friendly product development, cross-cultural communication for employees, care for children with autism, employment for the hearing impaired, and women's career development. This provided a multifaceted interpretation of diversity and inclusion.

Diversity shapes our team development and workplace culture, while our Tech for Good mission is underpinned by our digitally inclusive products and services. For more details, please refer to the *Digital Inclusion* section in this report.

When designing our office space and facilities, we thoroughly considered the diverse needs of our employees. For example, we provide dedicated meal pickup channels in our staff canteen, and all owned office buildings are equipped with nursing rooms for breastfeeding employees. Our self-constructed buildings feature accessible infrastructure that adheres to the Code for Accessibility Design in China and is further enhanced to the three-star accessibility standard to optimise employee experience. For example, on our Headquarters Campus, most of our buildings have ramped entrances with zero height difference between interior and exterior doors, ensuring smooth passage for wheelchair users and individuals with mobility aids.

We support our employees by addressing their needs throughout various life stages and helping them to balance work and life more effectively. We do this by providing flexible working hours and fully paid leave for prenatal care, maternity, paternity and childcare. Employees and their families have access to free professional counselling services covering career development, intimate relationships, and parenting. We also provide a one-stop service platform that facilitates nursing room reservations and birth registration.

We have implemented the Anti-Sexual Harassment Policy, which states Tencent's zero tolerance approach to sexual harassment. Dedicated reporting channels and handling procedures have been implemented to protect the rights and confidentiality of victims and whistleblowers, ensuring that relevant cases are handled promptly and appropriately. We have incorporated dedicated training on the prevention of sexual harassment into the mandatory onboarding training for our employees. Additionally, awareness-raising videos on sexual harassment prevention are continually played in office areas.

In 2025, females accounted for **32.7%** (2024: 32.4%; 2023: 32.4%) of Tencent employees¹ and **26.8%** (2024: 26.4%; 2023: 25.9%) across all management levels. Within management, female representation at senior level management was **8.6%** (2024: 8.3%; 2023: 8.1%), while junior level management was **26.9%** (2024: 26.6%; 2023: 26.0%). We will continue to explore more initiatives to encourage more female employees to join development pathways and increase their contributions to our business innovation and decision-making processes.



1. Employees are defined as permanent employees of the Company, which includes the Group Headquarters and its directly managed wholly-owned subsidiaries. Historical data have also been restated accordingly.

Digital Inclusion

Tencent provides inclusive digital products and services across sectors including education, healthcare, and finance. We offer tailored services to address the diverse needs of minors, seniors, people with disabilities, rural population, and other underserved communities. These efforts align with Digital Inclusion for All promoted by the United Nations and the International Telecommunication Union. By providing a broader user base with equal access to digital opportunities, we actively contribute to bridging the digital divide and promoting lasting social inclusion.

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* This image was generated by AI



UNGC Human Rights Principles

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

6.1

Development of Minors

We ensure a safe online environment for minors, harnessing our products and technological capabilities to provide inclusive, diverse educational resources and empower the next generation with essential digital literacy.

Tencent Digital Volunteer Teaching Project utilises digital tools such as its dedicated *Weixin Mini Program*, *Tencent Docs*, and *Tencent Meeting*, along with course materials from professional education support organisations, to deliver diverse learning resources to schools in rural areas through a collaborative teaching model that combines remote instruction by online volunteers with on-site guidance from local teachers. By the end of 2025, this project had partnered with over 50% of professional education charities in the Chinese Mainland, extending its reach to 822 districts or counties across the country and engaging over 220,000 volunteers.

In 2025, we co-developed with Tsinghua University the "Introduction to AI" courses, which were rolled out to over 900 rural schools across the Chinese Mainland through this project, expanding AI awareness among more than 30,000 students.



A student is assembling the robot from the *Future Technology Kit*



The achievements of Spring Bud InnoGirls Project were showcased at the Global Leaders' Meeting on Women



A volunteer from Tencent Digital Volunteer Teaching Project delivers an online session to students in the rural area

Smart and Healthy Programme supports the intellectual and physical development of children and adolescents in urban and rural areas. This is achieved by funding the construction of classrooms and sports fields, supplying AI-powered teaching equipment, interactive courses, and educational activities and contests. In 2025, this programme was upgraded into **Dream Touch Programme**, engaging tens of millions of players from over 90 Tencent titles. By the end of the year, a total of 152 classrooms and sports fields had been donated.

- *Future Technology Kit* provides programmable robot hardware equipped with AI voice and AI vision modules, along with supporting curriculum resources to help students enhance their hands-on and basic programming skills, making AI technology more accessible for beginners.
- *Future Sports Field* Mini Program uses AI posture recognition to translate users' real-time movements, such as jumping rope and playing soccer, into in-game actions, encouraging adolescents to engage in physical exercise through a gamified approach.

Launched in 2021 with the China Children and Teenagers' Foundation, **Spring Bud InnoGirls Project** provides girls in underserved areas with inclusive technology courses, hands-on research activities, and opportunities to collaborate with leading female technology professionals, enhancing their technological literacy and digital skills. In 2025, this project was recognised as a case in the white paper "The Practice and Achievements of China's Advancement of Women's All-round Development in the New Era", released by the State Council Information Office of China. Its achievements were showcased in the Exhibition on China's Progress in Digital and Intelligent Empowerment for Women and Girls at the Global Leaders' Meeting on Women. By the end of the year, the project had reached over 10,000 girls.

In addition, we launched 2025 Spring Bud InnoGirls Project × Tencent Mini-E InnoCamp, where participants used AI tools including *Tencent Yuanqi* and *Tencent Yuanbao* to develop customised teaching aid platforms or intelligent assistants, taking their first steps into programming from scratch.

Harnessing our expertise in AI, game technologies, and product interaction design, Tencent develops diverse teaching and learning tools alongside a variety of courses, competitions, and educational programmes. We aim to enhance the learning capabilities and innovation potential of minors, inspiring them for the future.

- *Mini Program Learning Platform* integrates a Mini Program development environment with AI tools, enabling teachers to deliver development courses and supporting students in creating Mini Programs to address real-world challenges. By the end of 2025, teachers and students worldwide had created over 170,000 Mini Program projects on the platform.



- *Tencent Coding* platform leverages game technology to deliver programming and AI learning solutions for students aged 6 to 18. In 2025, it introduced *Joy Code*, a web-based AI learning product that immerses beginners in a 3D learning environment with gamified challenges, enabling them to learn graphical and Python programming from scratch. By the end of 2025, products under the *Tencent Coding* platform had reached more than 39,000 schools and benefited over 10 million students.

- In 2025, leveraging *Tencent HY*, we launched two AI-powered educational products: *AI Teaching Assistant* platform and *Reading Companion* Mini Program. *AI Teaching Assistant* can summarise courses, generate or make suggestions to enhance teaching materials, helping teachers shorten preparation time. *Reading Companion* can read aloud to children, use real-time interaction to spark critical thinking, and generate a summary to help consolidate their learning takeaways.

In 2025, we launched *Tencent WeTech Academy*, a talent development platform, in Hong Kong. Powered by Tencent's technologies and educational tools, it offers a progressive learning pathway that integrates education, research, and competition, aiming to cultivate innovative and socially responsible talent.

- *Putonghua Funlearning* application combines AI speech assessment technology to give instant feedback and gamified interactive features to create a more engaging learning experience. In 2025, we hosted an online challenge activity "Putonghua Funlearning" in Hong Kong and Macao, attracting students from over 100 primary schools.



- *Tencent Little Safflower Project – STEAM for Good* provides secondary school students with STEAM¹ education and practical opportunities to apply technology for social good. The project hosts innovation challenges inviting students to develop solutions addressing topics, such as mental health, senior care, and carbon neutrality. Winning teams will receive scholarship awards, showcase their proposals in an exhibition, and have the opportunity to join the *Tencent Innovation Internship Programme*.

- *Tencent Innovation Internship Programme* invites secondary school students from Hong Kong and Macao to visit Tencent, where employees act as volunteer mentors to inform the operations of the technology company and career pathways. The programme encourages students to apply technological tools to address issues such as emergency response, education equity and ageing population.



1. STEAM refers to Science, Technology, Engineering, Arts, and Mathematics.

6.2

Empowerment of the Silver Generation

Leveraging technological innovation, Tencent empowered seniors, also known as the silver generation, through tailored products and services, enabling them to conveniently integrate into and safely navigate the digital world.

Our products, such as *Weixin*, *QQ*, *Tencent News*, *Tencent Maps*, and *Tencent Yuanbao*, enhance accessibility for the silver generation through interface optimisations, such as larger fonts, higher contrast, and simplified navigation, or assistive features, such as text-to-speech, automatic audio announcements, and dialect-based communication.

In 2025, we launched *AI for Good Corpus (Senior Text Corpus)* to train and enhance the ability of large-scale AI language models to understand the needs of the silver generation. Built upon over 9,000 sets of day-to-day dialogue from senior volunteers, the corpus supports philanthropic organisations, universities, and research institutions in their product development and academic research.

Tencent Customer Service continues to enhance its support for senior users. Since 2020, we have provided a dedicated hotline, followed by the launch of China's first in-person service hub in 2025 by an Internet company. Beyond manual customer service, it offers digital skills and cybersecurity workshops, a dialect service area, and an audio-video experience zone. It also provides assisted after-sales services for online shopping. Seniors simply need to present the product item via *Weixin* video calls and our customer service team will assist them in completing complex processes such as order tracking or documentation uploads.

By the end of 2025, *Tencent Customer Service* had served over **32 million** senior users.



Tencent Customer Service Hub for Senior Users

Assistive Products and Technologies



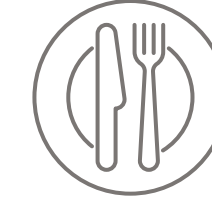
Healthcare

- *Silver Generation Hearing Health* Mini Program provides seniors with more accessible and convenient hearing tests.
- *Weixin Medical Assistant for Seniors* function helps senior users to book medical appointments, process payments, access reports, and obtain prescribed medications. It also enables one-click authentication to create medical records.



Transportation

- *EJiaShouHu (Family Guardian)* application, developed by *Tencent Maps*, enables users to track the locations of their senior relatives. They can set alerts which will be triggered if senior relatives move away from predefined safe zones. They can also book taxi rides for seniors and track their journey in real time.
- *Rides for Family* Mini Program allows users to pre-set frequent addresses and password-free payments for their senior relatives. Seniors can book rides with one click, automatically share details with relatives and pay fares upon arrival.



Dining

- *Weixin* palm-scanning dining service has been applied in the Smart Meal Programme for Seniors initiative launched by *Weixin Pay* and Tencent Foundation. By the end of 2025, the service had been rolled out to 128 community canteens. Eligible senior beneficiaries may verify their identity via a palm scan and enter to dine after completing the binding of their identity and palm print information.



Daily Care

- *Invisible Caregiver* system uses smart cameras to detect falls among senior users, automatically triggering alerts for family members or caregivers to attend to their conditions.
- *Silver Guardian Card* is a smart hardware device that features one-tap SOS calling, real-time location tracking, remote medical consultation, calls with family members, and *Weixin Pay*, making daily life safer and more convenient for senior users.
- *Time Community* Mini Program allows senior residents to post or respond to requests for assistance, organise or participate in community activities, and connect with local health centres to book health check-ups and access online medical consultations. By the end of 2025, the Mini Program had facilitated over 27,000 instances of mutual assistance and over 2,400 community activities, while helping over 3,000 senior residents schedule and complete health check-ups.

6.3

Skill Development for People with Disabilities

Tencent addresses the diverse needs of people with disabilities, upholding the principles of the United Nations Convention on the Rights of Persons with Disabilities. We drive accessibility enhancements across our products, developing tailored solutions and assistive services that equip individuals with core digital skills to thrive in a more inclusive digital society.

Visual Impairments

- Our products, including *Weixin*, *Tencent News*, *Weixin Reading*, *QQ*, and *Tencent Yuanbao*, include a text-to-speech feature, enabling users to access information.
- *Sogou Input* allows users to swiftly locate and recognise the correct keys while typing on touchscreen mobile keyboards via tactile vibration feedback.
- *Tencent Maps* provides accessible navigation, including walking guidance with deviation correction, vibration alerts for public transport routes, and real-time voice notifications of location and orientation.
- *Tencent Video* provides accessible films for users. Through collaboration between Tencent and professional institutions, these films are produced with AI assistance. AI can identify and translate visual content into audio scripts, then complete the dubbing and final editing after volunteers refine the scripts. By the end of 2025, 211 accessible films were made available to the visually impaired audience for free.
- *Weixin Pay's* accessible service hotline allows users to reach dedicated customer support directly without navigating button menus. By the end of 2025, the hotline had resolved over 850,000 user inquiries.

Hearing Impairments

- *Tencent Ethereal Remote Hearing Service Platform* provides online hearing aid-fitting services via *Tencent Meeting*.
- *QQ Music* combines AI and audio technologies to fine-tune music, curating a low-frequency music library for people with mid-to-high-frequency hearing impairments.

Cognitive Impairments

- *Tencent Brain Training-Cognitive Function Training Software* is designed to assist individuals with mild cognitive impairments. Through gamified modules covering themes including cooking, music, poetry, and organising, it targets the enhancement of multiple cognitive domains, including memory, attention, perceptual-motor skills, executive function, language, and social cognition. In 2025, the software received the medical device registration certificate issued by the Guangdong Provincial Medical Products Administration and was officially put into clinical use.

Physical Impairments

- *Sogou Input* offers technical solutions including eye movement input, speech-to-text conversion and optical character recognition, helping users communicate and express themselves in the digital world.
- *Tencent Maps* and its Mini Program add an accessible public transit route navigation feature, guiding users with mobility challenges to entrances equipped with lifts or ramps, and displaying accessibility facility information at stops along the route.



Tencent Brain Training-Cognitive Function Training Software

In 2025, we introduced in *Nearby Jobs* Mini Program a dedicated section for people with disabilities, integrating approximately 3,000 job openings certified by China Disabled Persons' Federation Employment Service Platform. Within the Mini Program, users can sort listings by location, job type, and disability category, then apply for suitable openings.

We have funded and developed a sign language video database, providing high-quality training resources for philanthropic organisations, service providers, and research teams. Additionally, in collaboration with the China Association of the Deaf and Hard of Hearing and other partners, we have built an AI sign language translation algorithm model and intelligent translation devices. These were implemented during the 2025 National Games for Persons with Disabilities and the National Special Olympic Games, facilitating sign language translation and communication among multiple parties.

In 2025, we collaborated with philanthropic organisations to develop AI knowledge bases catering to communities with impairments in hearing, vision, and movement, as well as autism, featuring intelligent Q&A services to help users address issues in these fields.



Nearby Jobs Mini Program



AI agents for communities with impairments in hearing, vision, and movement, as well as autism

6.4

Inclusive Healthcare for Women

Breast and cervical cancers are two major threats to women's health characterised by high morbidity and mortality rates. To support the prevention and control of these two cancers among women in underserved areas, we launched the Digital Prevention and Control for Women's Breast Cancer & Cervical Cancer Project in collaboration with our partners and developed the *Breast Cancer and Cervical Cancer Screening Platform*.

Accessible via PC and Mini Programs, this platform integrates a full suite of functions from health education and screening to diagnosis, follow-up, and quality control. Since 2023, the platform has lowered duplicate screening rates from 12.64% to below 1%, reducing the waste of medical resources. We also developed an AI-assisted colposcopy diagnostic system, which supports primary care physicians in rapidly identifying suspected lesions and accessing diagnostic recommendations.

To date, the project has been deployed in over 40 counties and cities across Central and Western China, benefitting more than 700,000 women. On the prevention front, we have worked with partners to provide free HPV vaccines and vaccination services to over 100,000 age-eligible girls. In 2025, this project was featured in an exhibition on China's Progress in Digital and Intelligent Empowerment for Women and Girls at the Global Leaders' Meeting on Women.



Beneficiaries using the *Breast Cancer and Cervical Cancer Screening Platform*

Nie Yihamo is an ethnic woman from Liziping Yi Ethnic Township, Shimian County, Sichuan Province. For years, she spent her days on farm work and always relied on medication to get by when she fell ill, unaware of the necessity for professional medical screenings. Following the local implementation of Tencent Women's Breast Cancer & Cervical Cancer Digital & Intelligent Prevention and Control Project, she participated in a free screening. She was diagnosed with high-grade cervical precancerous lesions and had access to professional treatment directly within her county, sparing her from the hassle of travelling far for medical care.

Today, her health is steadily improving through routine medication and regular follow-up visits. Supported by cross-sector collaboration, the inclusive reach of digital technology is empowering women in underserved regions, ensuring they no longer miss critical treatment windows due to information barriers.

6.5

Supporting Rural Development

Tencent provides digital tools to facilitate talent development and capacity building in underserved areas, supporting rural economic growth and poverty alleviation.

Our Rural Prosperity Innovation Programme aims to empower rural management talents through training and digital services. In 2025, the programme was recognised as one of the 6th Global Case Studies on Best Poverty Reduction Practices. In China, we support local governments in cultivating "Rural CEOs," providing them with specialised curricula in rural enterprise management, on-the-job training, and field visits. This programme has been rolled out in 446 counties and districts across 20 provinces and municipalities across China. Building on this experience, we partnered with academic institutions and local governments in the Global South to jointly launch rural talent development programmes in Tanzania, Uganda, Indonesia, Kenya, and Laos.

In China, we launched the *Rural Prosperity Learning Hub* Mini Program to support online learning and exchange for rural management talents, attracting over 130,000 registered users.

In 2025, we organised a training on *Weixin Mini Shops* and *Video Accounts* focused on local produce, facilitating the sale of agricultural products and regional specialities. Through a combination of online courses and hands-on offline guidance, participants launched 350 *Weixin Mini Shops*, processing over 600,000 orders with total sales exceeding RMB30 million.

In rural county-level areas, we leverage our financial technology innovation to help village and township banks enhance their digital platform capabilities, so that farmers can apply for credit, receive approval, and access loan disbursements online. We continue to advance our Digital Empowerment of Agribusiness initiative by partnering with cooperative banks to offer farmers consumer discounts and reduced withdrawal fees via *Weixin*. In 2025, these efforts benefited more than 78,000 farmers. In addition, with the support of NetsUnion Clearing Corporation, we launched the Hometown Specialities Project with multiple financial institutions, helping local merchants onboard to *Weixin Mini Shop* to sell local specialities and providing them with digital skills training.



In-person Exchange Session for Rural CEOs

6.6

Inclusive Financial Products and Services

Leveraging our convenient, popular and secure payment platform, Tencent is committed to offering diverse users seamless transactional experiences and inclusive financial products.

Weixin Pay connects over 800 million users, 50 million MSMEs, and over 10,000 service providers, creating a partner ecosystem that is convenient, integrates online and offline, and spans multiple industries and related use cases. These include education, healthcare, transportation, utility bill payment, dining, travel, logistics, entertainment, and retail, offering diverse payment methods tailored to meet users' needs.

For groups with limited access to traditional financial services, we leverage innovative partnerships to provide secure and convenient online financial products, including *LingQianTong*, *LiCaiTong*, *FenFu*, and *WeSure*, enabling them to benefit from inclusive finance.



Convenient Cross-border Payments

We are committed to promoting the two-way flow of tourism-related trade and cultural exchange. Overseas users can link their international bank cards to pay directly via *Weixin Pay* or via overseas third-party wallets accepted by *Weixin Pay* by scanning QR codes to complete transactions in the Chinese Mainland.

In overseas countries and regions where *Weixin Pay* is supported, Chinese users can make local payments using *Weixin Pay*, or transfer money cross-border to their *Weixin Pay* account through local remittance partners.

Enterprise users can leverage the *TenPay Global* platform for cross-border collection, payments, and currency exchange. MSMEs engaged in international trade can benefit from a transparent fee structure and secured payment solutions. In 2025, we launched *TenPay Global Checkout*, offering *Weixin Mini Program* merchants operating in global markets a single interface to integrate multiple local payment methods, including digital wallets, real-time payment networks, and credit and debit cards.



Supporting MSMEs

We leverage technologies and platforms to support MSME growth. A key initiative is the Small Shops and Repairs Map, co-created by *Weixin* and *Tencent Maps*, which enables users to quickly locate essential services such as shoe repairs and tailoring. Additionally, *Weixin Pay's* digital toolkit equips small merchants with essential functions, including payment collection, data analytics, and membership marketing.

In 2025, *Weixin Pay* introduced the Payment Link service, enabling MSMEs to create customised payment pages featuring item details, pricing, and other relevant information. By sharing these links within *Weixin* groups, merchants allow customers to complete payments with a single click. This service streamlines operations by automating repetitive manual tasks, such as order-taking, bookkeeping, and payment reconciliation, thereby minimising human error and enhancing overall efficiency. To date, the service has been widely adopted in multiple sectors, including community group buying, tutoring, and catering.

Separately, we extended the fee reduction scheme implemented by *Tenpay* in 2021, offering discounts on payment processing fees to eligible micro and small businesses, self-employed individuals, and individuals in flexible employment, as well as withdrawal fee discounts to eligible users of personal payment QR codes, aiming to ease their operational burden. By the end of 2025, *Tenpay* had provided cumulative reductions exceeding RMB67 billion, benefitting over 76 million merchants. The policy concessions will remain in effect until 30 September 2026. Furthermore, *Tencent WeSure* introduced a series of insurance products, including *QR Code Collection Security Insurance*, *Merchant Owner Accident Insurance*, and *Merchant Staff Insurance*, to serve over 29 million small and medium-sized business owners.



Extending Reach to Underserved Groups

We address the employment and living needs of gig workers, financially disadvantaged groups, people with disabilities, and other underserved groups, providing accessible, affordable services and support.

For gig workers, the Virtual Staff Card + Gig Worker Insurance solution connects with gig employment platforms and provides end-to-end digital functions, including contract signing, clock-in/out, payroll settlement, and daily-rated insurance coverage. In 2025, this solution served over 22 million gig workers.

For financially disadvantaged groups, *Tencent WeSure* Caring Philanthropic Programme offers premium subsidies, enabling eligible individuals verified by local governments to obtain insurance coverage with an annual sum insured of RMB1.5-3 million for a nominal contribution of just RMB0.01 or RMB1. By the end of 2025, the programme had paid out over RMB25 million in claims, benefitting more than 450,000 individuals.

Since 2021, we have been running the *Weixin Pay* Caring Meal Philanthropic Programme, which helps seniors, people with disabilities, sanitation workers, delivery riders, and other underserved groups quickly locate small shops offering caring meals and bottled water through a dedicated Mini Program. The programme also provides participating shops with free customised homepages and promotional posters. By the end of 2025, over **100,000** Caring Shops had joined the programme.

微信支付 爱心小店

10万街巷小店
烟火公益新生态

Weixin Pay Caring Shops Mini Program

Tech for Good Supporting Sustainable Development Goals

Technology is a capability, and doing good is a conscious choice. Our Sustainable Social Value ("SSV") Organisation maintains end-to-end oversight of our social commitments. Through rigorous research and strategic piloting, we have identified key domains with the potential for scalable impact to anchor our long-term investment priorities. By the end of 2025, cumulative expenditure on SSV initiatives reached RMB15.7 billion. Tencent also received a Distinguished Contribution Award at the World Internet Conference Wuzhen Summit.

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7.1

Basic Sciences Research

Tencent supports scientists in their pursuit of fundamental research that advances human well-being. We have endowed the New Cornerstone Science Foundation with RMB10 billion, which administers the Xplorer Prize and the New Cornerstone Investigator Program. Beyond providing unrestricted funding for pioneering researchers, we also curate initiatives such as scientific exhibitions to foster public scientific literacy.

The Xplorer Prize aims to support young scientists in exploring the uncharted frontiers of science and technology. Open to global talent working full-time in the Chinese Mainland, Hong Kong, and Macao, the Prize covers ten key fields across basic sciences and cutting-edge technologies. Awardees are selected by a panel of scientists, and each awardee will receive a discretionary grant of RMB3 million over a five-year period. In 2025, a total of 50 scientists were awarded the Xplorer Prize, including 9 female scientists. Since its establishment in 2018, the Prize had provided funding to 347 scientists across 7 cohorts.

The New Cornerstone Investigator Program aims at providing long-term and stable support to outstanding scientists in pursuing basic research and achieving 0 to 1 breakthrough. This programme focuses on two main fields: mathematics and physical sciences, as well as the biological and medical sciences, encouraging interdisciplinary research. Awardees can receive funding of up to RMB25 million for experimental projects or RMB15 million for theoretical projects over a five-year period. Since its launch in 2022, the New Cornerstone Investigator Program had funded 3 cohorts totalling 139 scientists. As the community expands, we organise events including academic forums and international panels to facilitate interdisciplinary exchanges.



7.2

Digital Upgrade of the Philanthropic Sector

Launched in 2007 as one of the first online fundraising platforms in the Chinese Mainland, *Tencent Charity Platform* has established a rigorous mechanism for philanthropic organisations to disclose project information, ensuring comprehensive transparency. The platform empowers organisations to activate hundreds of millions of potential users on Weixin, enabling precise connections between donors, projects, and beneficiaries. Furthermore, our digital tools facilitate real-time delivery of periodic project updates to donors and volunteers via their mobile devices. These initiatives have significantly increased operational efficiency for the philanthropic sector, bolstered public trust, and deeply integrated philanthropic action into daily life.

Digital Platform and Tools

We have made transparent disclosures as one of the key criteria for projects to be listed, which requires philanthropic organisations to disclose their financial and operational status regularly, enabling users to monitor the progress of funded philanthropic projects from their mobile devices. This platform facilitates communication among donors, philanthropic organisations, and beneficiaries, strengthening public scrutiny and mutual trust. By the end of 2025, over 580,000 project updates had been published through the platform.

By the end of 2025, *Tencent Charity Platform* had accumulated over **1.9 billion** donations made, supported approximately **136,000** philanthropic projects and raised more than **RMB37.1 billion**.

Digital tools can enhance the operational efficiency of philanthropic organisations. We provide eligible organisations with entitlements to use digital tools including *Tencent Meeting*, *Tencent Docs*, and cloud services, and have granted over 6,500 entitlements to more than 2,100 philanthropic organisations. We further develop digital tools tailored to the specific needs of the philanthropic sector, such as transparency reports, AI-assisted optimisation of project proposals, and project screening.

Broadening Reach to Potential Donors



In 2025, we hosted the Giving for Good initiative, one of the world's largest digital philanthropic events for the eleventh consecutive year, attracting **530 million** engagements through monetary donations, step counts, book donations, blood donations, and volunteering. Over **140** Tencent products and services integrated philanthropy features, enabling users to engage anytime and anywhere across social media, payment, video, news, and game platforms. We also connect over **1,800** philanthropic organisations, more than **4,300** philanthropic projects, and over **100,000** businesses to participate in the initiative, further increasing its social impact.

We have integrated charitable activities into various business scenarios to expand the reach of philanthropic projects, facilitating public engagement in daily life. For example, our *Donation by Cent* feature enables users to make donations at the minimum cost of RMB0.01 during everyday payment transactions. By the end of 2025, *Donation by Cent* programme had reached 788 million participants and raised over RMB121 million.

We also promote employee engagement in philanthropic activities. We grant one full-paid day of leave each year for our employees to participate in volunteer services. Employees can register to participate in or initiate diverse philanthropic projects via the *Act for Good* Mini Program. A total of over 41,600 employees had participated in 2,969 philanthropic activities through the Mini Program, with 563 employees proactively initiating projects. These projects cover environmental protection, animal care, youth development, support for the senior citizens, aid for people with disabilities, emergency assistance, and healthcare.

Enabling Precise Connections with Beneficiaries

As we expand public participation in philanthropic actions, we also leverage digital technologies to enhance the precision and effectiveness of connections between philanthropic organisations, beneficiaries, and donors.

We enable philanthropic organisations to rapidly verify the identity of beneficiaries and precisely and efficiently transfer donations to beneficiaries' *Weixin* Accounts, leveraging *Weixin Pay's* real-name verification and fund disbursement capabilities. This has enhanced the traceability of fund flows and shortened disbursement cycle from one to two months to merely ten minutes.

We have launched the *Digital Care Platform* Mini Program, which matches beneficiaries' needs with corresponding services and resources across multiple scenarios, including medical assistance and meal support for seniors, companionship services for children, and care services for underserved groups. This platform connects multiple stakeholders, where businesses provide various forms of assistance, including monetary cards, vouchers redeemable for supplies, and digitalised cash-for-work subsidies on the platform; beneficiaries select suitable options tailored to their needs on the platform and receive more targeted assistance; philanthropic organisations and volunteers deliver their donations and services more precisely and promptly to the beneficiaries.



Volunteers helping beneficiaries use *Digital Care Platform*

On this platform, beneficiaries are no longer passive recipients of aid but the decision-makers of their own needs. This ensures beneficiaries retain autonomy while simultaneously enabling effective verification of service outcomes. By the end of 2025, over **120** philanthropic projects had been implemented across **20** provinces, autonomous regions, and municipalities in China, engaging more than **460** philanthropic organisations and over **610** businesses.

7.3

Cultural Heritage and Inclusive Access

We leverage our AI, 3D modelling, and mobile Internet capabilities to advance the preservation of world cultural heritage in collaboration with our partners, for example, the Great Wall and the Beijing Central Axis. In 2025, we made the following progress:

- **Digital Dunhuang Library Cave** uses high-definition digital scanning and game engine technologies to reconstruct the historical scenes of the cave and its artefacts in an immersive online environment. In 2025, we digitised ancient manuscripts through AI large-model technology and intelligent retrieval, assisting the Dunhuang Academy in launching the Digital Library Cave database platform. The repository comprises over 9,900 scrolls and more than 60,700 images, covering Buddhist scriptures, Vinaya texts, historical contracts and silk paintings. Users can search, translate, and summarise these ancient texts more efficiently, and access contextual knowledge promptly via AI-powered Q&A.



- **Xixia Imperial Tombs** were inscribed on UNESCO's World Heritage List in 2025. We assisted in developing a dedicated Mini Program for the Xixia Imperial Tombs Museum, digitalising its artefacts to facilitate public access. We further explore the application of AI technology to piece together over 4,000 stone stelae fragments unearthed at the site, significantly improving the efficiency and precision of archaeological restoration.

- **Oracle Bone Script** is recognised as the earliest known mature writing system discovered in China and has been inscribed on the UNESCO Memory of the World Register. We have open-sourced the world's largest multimodal Oracle Bone Script dataset and launched a specialised AI Agent in 2025, which provides researchers with high-precision tools.

Tencent promotes inclusive access to cultural resources through multiple initiatives, to address regional and group-based disparities in the distribution of cultural resources.

- **Star Plan** supports small and medium-sized museums in enhancing their foundational digital capabilities and improving digital displays of cultural artefacts. We also assist them in enriching the visitor experience by optimising services including online booking and audio guides. We had helped over 500 museums in China to develop and enhance their digital platforms.
- **Harmony Program** enhances access to public resources such as museums and opera houses through philanthropic projects with partners. By the end of 2025, we had co-organised 17 events, inviting over 5,000 individuals from various groups including migrant children, families of children with illnesses, veterans, and rural teachers to watch complimentary performances and exhibitions at the National Centre for the Performing Arts, Shanghai Natural History Museum, and Shanghai Astronomy Museum.

- **Zhi Mei Initiative** provides rural primary schools with education resource packs, supporting curricula, and teacher training to promote equitable access to arts education resources in rural areas. The initiative had been implemented in rural schools across 26 provinces, autonomous regions, and municipalities in China, benefitting over 86,000 teachers and students.



7.4

Emergency Preparedness

Earthquake Early Warning

Earthquakes are characterised by their unpredictability and severity, and only by issuing warnings within an extremely short timeframe can we effectively mitigate the harmful impact to people and property. We developed *Earthquake Early Warning Mini Program* with high concurrency and low latency, improving the lead time and coverage of earthquake early warnings across China. If an earthquake with potentially severe destructive impacts occurs, users will receive heightened alerts through their mobile devices.

This Mini Program was launched on Weixin in 2024 and expanded to QQ in 2025. By the year end, more than 35 million users had activated this feature. A total of 443 alerts were issued, with an average delivery time of 0.679 seconds per alert, reaching more than 19 million people in total.

Emergency Response

Penguin Emergency Mini Program enables multi-stakeholder participation in first-aid scenarios through integrating multi-party video conferencing, mobile communication technologies, precise positioning, and navigation capabilities of *Tencent Maps*. Upon receiving a call, the 120 Emergency Medical Centre can send a link to the user via SMS. By clicking this link, the user activates the Mini Program to transmit their exact location to the Centre, eliminating communication delays caused by geographic ambiguity and buying precious time for life-saving intervention. During the critical interval before an ambulance arrives, the Mini Program facilitates synchronised communication between the caller, the Centre, paramedics, and volunteers. This allows professional medical staff to provide remote, real-time guidance for on-site emergency procedures, significantly enhancing the effectiveness of pre-hospital care.

The Mini Program features an integrated AED map that swiftly directs users to the nearest device, streamlining rapid and precise pre-hospital response. In recent years, we collaborated with partners to deploy AED devices across community hubs, including residential buildings, shopping malls, retail outlets, and logistics hubs, expanding our emergency response network. By the end of 2025, *Penguin Emergency* has mobilised over 897,000 first-aid volunteers and connected over 27,000 AED devices, facilitating over 57,000 rescue operations through the Mini Program, including over 2,100 cardiac arrest cases.



On 26 November 2025, following a devastating five-alarm fire in Tai Po, Hong Kong, the Tencent Charity Foundation (Hong Kong) donated **HKD30 million** to immediate relief efforts. These funds were directed towards relief support for affected residents through temporary housing, essential supplies, and professional psychological counselling. Our technology team and employee volunteers partnered with local social service organisations to develop and deploy a dedicated AI assistant within 72 hours of the request. This digital tool served as a critical information hub, enabling social workers and residents to access real-time updates and essential disaster-relief resources.

7.5

Digital and Intelligent Upgrade of Industries

Tencent invests heavily in platforms, technologies and talents, positioning itself as a trusted digital assistant to facilitate the digital and intelligent upgrade of enterprises. By exploring creative and cross-sector application of technologies across industries, we are carving out new paths to contribute to the sustainable development of society.

Healthcare

In collaboration with the Peking University Cancer Hospital, we launched the **Pilot Demonstration Project for Precision Prevention and Treatment of Upper Gastrointestinal Malignant Tumours** in Ningxia, China. By implementing a digital remote diagnosis model, the project has significantly enhanced screening efficiency while reducing operational costs.

To date, this project has covered a total screening population of more than **60,000**, achieving a **30.8%** reduction in the cost per cancer case detected.

Furthermore, we have initiated breast and cervical cancer prevention programmes for women in low-resource regions. More details can be found in the *Digital Inclusion – Inclusive Healthcare for Women* section in this report.

Throughout the entire medical treatment process, we leverage AI to help doctors and patients in a wide range of online and offline scenarios:

1 Pre-Consultation

Through Q&A, symptom self-assessment and intelligent triage features, patients are assisted in accessing appropriate medical care, thereby enhancing the efficiency of healthcare decision-making.

2 During Consultation

Intelligent Pre-consultation System automatically generates draft medical records, reducing doctors' administrative workload; AI clinical assistants powered by large-scale AI model technology provide decision support during medical history collection, disease prediction, treatment plan recommendations, and medication safety monitoring. **The medical imaging AI of Tencent AIMIS** has been deployed across more than 600 healthcare institutions in China, assisting medical staff in completing approximately 10 million patient examinations to date.

3 Post-Consultation

Health Management Assistant focuses on the intelligent interpretation of health examination reports and laboratory data, providing users with dynamic health assessments, risk alerts, and personalised follow-up plans to deliver long-term health monitoring.

Leveraging our proprietary AI models and algorithms, we collaborate with partners such as hospitals and pharmaceutical companies to advance life science research, drug discovery, and clinical applications. Numerous collaborative findings have been published in top-tier international journals, including Nature, Science, and Cell. Notably, our *iDrug* platform empowers researchers to enhance the efficiency of early-stage drug discovery and lead optimisation, thereby accelerating the transformation of promising molecules into clinically viable drug candidates. Furthermore, our *DeepGEM* large-scale model enables the precise prediction of lung cancer gene mutations solely from pathological images – a breakthrough published in The Lancet Oncology.



DeepGEM large-scale model applied to pathological analysis

Industrial Settings

In hazardous or complex industrial environments such as mining, ports, and metallurgy, we deploy real-time communication technologies to enhance the precision and efficiency of remote operations, reducing human exposure to dangerous conditions.

By integrating the technologies with AI algorithms, we have established an industry-leading low-latency, high-intelligence interactive platform. This platform ensures global end-to-end audio-visual transmission latency remains consistently below **300** milliseconds, while keeping overall session interaction latency under **1,000** milliseconds. This achieves seamless, real-time synchronisation, ensuring instantaneous feedback and sensory alignment for remote tasks.

In 2025, this platform was further enhanced with multimodal AI media processing and interaction capabilities, supporting real-time analysis across text, voice, video, and digital avatars. Through high-definition video streaming and AI-powered visual recognition, this system enables automated inspections of large-scale equipment and precise early-stage fault diagnosis.

Transport and Logistics

We enable the transport and logistics sectors to reduce costs, save energy, and reduce emissions by providing solutions that integrate cloud computing, big data, AI, and mapping services. In transport, we provide centralised management solutions built on public cloud infrastructure. Using AI-assisted scheduling and big data analytics, we optimise workflows to generate significant cost savings. In logistics, our end-to-end mapping services, AI-assisted route optimisation, and capacity matching enable intelligent control from collection to final delivery. This reduces redundant mileage and directly supports the low-carbon transition of the transport industry.

Through products such as *Transit QR Code* and *Tencent Maps*, users can scan and pay for public transport across cities, access real-time bus information, and make flexible journey planning. By the end of 2025, the Code had been available in 276 cities, with daily usage reaching 10 million transactions. We have also integrated multilingual translation features to assist international visitors in China, thereby enhancing the accessibility and international appeal of urban services.



Talent Development

We provide a variety of talent development and inclusive programmes to build a robust talent pipeline to support the digital and intelligent transformation of industries.

- *Tencent's AI Arena* platform supports AI talent development through educational initiatives, teacher training, and contests. In 2025, we collaborated with industry partners to launch the AI Reinforcement Learning Sustainable Development Plan, providing Chinese universities with complimentary access to platforms and resources. By the end of 2025, 37 universities had joined the initiative, reaching nearly 20,000 students. We also hosted the 2025 Tencent AI Arena Global Open Competition, attracting over 9,000 students from more than 534 universities.
- *CIE-Tencent Doctoral Research Incentive Project* provides funding and computing resources to outstanding doctoral candidates specialised in large-scale model research, attracting participation from over 50 domestic universities.
- *Tencent Rhino Bird Elite Talent Cultivation Programme* has groomed approximately 500 exceptional university students, facilitating the transition of academic research to real-world industrial applications. Participants have published over 500 papers in international top-tier journals and delivered numerous presentations at conferences, and filed more than 220 patent applications.

Appendix

About This Report

This report is prepared in accordance with the HKEX ESG Reporting Code, while referencing the IFRS S1/2, the GRI Standards and the SASB Standards.

In this report, "the Company" refers to "Tencent Holdings Limited". In defining the reporting boundary of the ESG report, we assessed factors including operational control, local regulations, and financial materiality.

The reporting boundary of the Company was expanded in 2025 to include the Group Headquarters and our directly managed wholly-owned subsidiaries, thereby enhancing the transparency of our ESG disclosures. The impact of this expansion on historical environmental data was assessed and found to be immaterial. The historical workforce data for the financial years 2023 and 2024 had been restated. Certain sections of this report relate to the ESG performance of our listed subsidiaries, including Tencent Music Entertainment Group and China Literature Limited. This report covers the Company's ESG performance for the period from 1 January 2025 to 31 December 2025.

The Company has engaged PricewaterhouseCoopers to conduct a limited assurance on the selected ESG KPIs in accordance with the International Standard on Assurance Engagements ISAE 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information. For more details on the level, scope, assurance process and the complete assurance statement, please refer to the *Appendix – Assurance and Verification* in this report.

This report should be read together with Tencent 2025 Annual Report (including the Directors' Report and the Corporate Governance Report), and the ESG page of the Company's official website. Should you have any questions, please contact us at ESG@tencent.com.

This report is prepared in alignment with the reporting principles of "materiality", "quantitative", "balance" and "consistency" with further details set out below.



Materiality

We have conducted a detailed materiality assessment to identify and evaluate key ESG issues that are most important to our business as well as our internal and external stakeholders. The information gathered from the materiality assessment was then used to determine the content of this report. For more details on the materiality assessment, please refer to the *ESG Governance – ESG Materiality Assessment* section in this report.



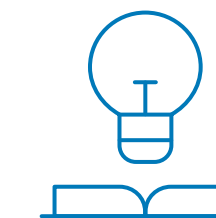
Quantitative

We disclose measurable environmental and social KPIs and set quantitative performance targets where applicable. The measurement standards, methodologies, assumptions and/or calculation tools of the KPIs in this report, as well as the source of the conversion factors used, have been explained in the corresponding context (where applicable).



Balance

This report aims to provide a balanced representation of our ESG efforts around the environment, our people, operating principles and practices, product responsibility and social commitments.



Consistency

This year's ESG report has been prepared with the same method used in previous years. Changes that may affect a meaningful comparison with previous reports have been explained in the corresponding sections.

Climate- and Nature-related Information

Governance

Board of Directors

The Board, supported by the Corporate Governance Committee, oversees our environmental stewardship. Equipped with competencies, the committee maintains ongoing oversight of our environmental performance through updates on regulatory developments, Tencent's environmental initiatives, and global trends.

Management

The ESG Working Group is responsible for managing our environmental performance and reports to the Corporate Governance Committee twice a year. We disclose the progress of our climate- and nature-related initiatives in accordance with the HKEX ESG Reporting Code, with reference to IFRS S2, TCFD and TNFD.

Table 1 Climate and Nature Management Structure

Management and Coordination

The ESG Working Group is co-chaired by the Chief Strategy Officer (CSO) and the Chief Financial Officer (CFO).

- Identify, assess, and monitor climate- and nature-related risks and opportunities;
- Conduct nature-related impact and dependency analyses;
- Review our ESG strategy, establish climate- and nature-related risk response measures, and monitor relevant business departments to implement actions;
- Explore and seize ESG-related opportunities;
- Review and update the ESG targets based on corporate strategy and international standards;
- Conduct annual audits of climate- and nature-related metrics;
- Enhance employee awareness of climate and nature topics.

Implementation

The Carbon Neutrality Joint Project Group is led by Senior Vice President and guided by senior advisers specialising in climate and energy. The group consists of the Strategy Development Department, Data Centre Green Energy Team, ESG Coordination Office, Administration Department, and low-carbon-related product teams.

- Develop an appropriate climate strategy, which includes a resilience plan, response measures for managing climate-related risks, and initiatives for exploring opportunities;
- Implement climate response measures and explore business opportunities;
- Develop and review climate-related targets and set up metrics to regularly monitor the progress.

The Biodiversity Conservation Special Committee is affiliated with the ESG Working Group.

- Implement measures to reduce the nature-related impacts and dependencies of our operations and value chain;
- Implement response measures for nature-related risks and initiatives for exploring opportunities;
- Initiate biodiversity conservation projects and apply digital technologies to support ecosystem and species conservation;
- Track nature-related indicators to measure the effectiveness of efforts.

Strategy

Climate Strategy

We have conducted a climate scenario analysis of our business model and value chain to identify potential climate-related risks and opportunities and assess their impacts. The analysis covers our operational assets, including data centres and office buildings, and is based on datasets from the Intergovernmental Panel on Climate Change (IPCC) and the International Energy Agency (IEA).

Based on the analytical results, we assessed the potential financial losses associated with physical risks to assets, alongside the effect of transition risks and opportunities on operating income. Our assessment identified no material climate-related effects on our financial position or financial performance during the reporting period.

Table 2 Time Horizons and Selection of Climate Scenarios

Risk and opportunity categories	Time horizons	Selection of climate scenarios ¹
Physical risks ^{2,3} <ul style="list-style-type: none"> • Acute • Chronic 	Baseline ⁴ 2030 ⁵ 2050 ⁵	IPCC Sixth Assessment Report Shared Socioeconomic Pathways ("SSP") 1) Low-carbon scenarios (aligned with the Paris Agreement): <ul style="list-style-type: none"> • SSP1-2.6 2) High-carbon scenarios (business-as-usual): <ul style="list-style-type: none"> • SSP3-7.0 • SSP5-8.5
Transition risks ⁶ <ul style="list-style-type: none"> • Policy and legal • Technology • Market • Reputation 	2030 ⁷ 2040 ⁷ 2050 ⁷	IEA 1) Low-carbon scenarios (aligned with the Paris Agreement): <ul style="list-style-type: none"> • Net Zero Emissions by 2050 Scenario 2) High-carbon scenarios (business-as-usual): <ul style="list-style-type: none"> • Stated Policies Scenario
Opportunities <ul style="list-style-type: none"> • Energy efficiency • Energy sources • Products and services • Market • Resilience 		

1. The selected physical and transition scenarios align with our Net-Zero Target.

2. The exposure ratings in physical risk scenario analysis do not consider the likelihood of the event occurring and only assess the extent to which assets may be exposed if the event occurs.

3. Physical risks are assessed by applying 30-year data based on the standard of the World Meteorological Organisation.

4. Baseline covers the data for the period 1985-2014, which is used to assess the ability of climate models to simulate the historical records of climate hazards.

5. To assess potential impacts, physical risks are evaluated across short-, medium-, and long-term time horizons, corresponding to baseline, 2030, and 2050, in alignment with our corporate and climate strategy and climate risk datasets.

6. Assuming the scenario indicator selected for each transition risk and opportunity is consistent with our future business development.

7. To assess potential impacts, transition risks and opportunities are evaluated across short-, medium-, and long-term time horizons at 10-year intervals, taking into account Tencent's business development strategy and the frequency of transition risk changes.

Table 3 Potential Impacts of Climate-related Risks and Opportunities¹

Physical risks	Category	Potential impact	Potential impact level ²		
			Baseline	2030	2050
Extreme heat		<ul style="list-style-type: none"> Shortage of power supply due to extreme heat may affect the continuous operation of facilities, resulting in potential loss of operating revenue; Extreme heat increases the cooling demand of facilities and the corresponding increase in cooling energy consumption, which may lead to increased operating costs; Extreme heat poses potential safety and health risks to employees. 	Low	Moderate	High
Extreme cold		<ul style="list-style-type: none"> Increased energy demand for heating during extreme cold conditions may bring additional operating costs; Icing and blizzard affect the continuity of facility operations and may impact operating revenue; Extreme cold poses potential safety and health risks to employees. 	Low	Low	Very low
Flooding – including river, coastal, and extreme rainfall	Acute	<p>The most affected assets are concentrated in Southern, Northern, and Southwestern China:</p> <ul style="list-style-type: none"> Flooding may damage data centres, potentially resulting in data loss and safety risks to employees; Flooding may affect the continuous operation of the facility and may impact operating revenue. 	Moderate	Moderate	High
Typhoon		<p>The most affected assets are concentrated in Southern and Eastern China:</p> <ul style="list-style-type: none"> Extreme wind and flooding caused by typhoons may damage the infrastructure and pose safety risks to employees; Temporary closure of assets due to typhoon may lead to business interruption, potentially impacting operating revenue. 	Moderate	High	High
Rainfall-induced landslides		<ul style="list-style-type: none"> Landslides may damage the infrastructure and facilities, resulting in business interruption, potentially impacting operating revenue; Landslides may pose safety risks to employees. 	Low	Low	Low
Wildfires ³		<ul style="list-style-type: none"> Wildfires may damage facilities and affect the continuous operation of facilities, potentially impacting operating revenue; Wildfires may pose safety risks to employees. 	Moderate	Moderate	High
Water stress and drought	Chronic	<p>The most affected assets are concentrated in Eastern and Northern China:</p> <ul style="list-style-type: none"> Lack of cooling water for data centres due to water shortages may affect the continuity of operations and impact operating revenue; In the event of a shortage of common water, this may result in increased operating costs for alternative water procurement. 	Moderate	High	High

1. This table presents the inherent risks and opportunities identified by Tencent's climate scenario analysis, without considering mitigation measures that have been implemented or are planned for implementation. Based on the scenario analysis results, we have developed and implemented targeted measures to address the identified climate risks and opportunities. Meanwhile, the climate scenario analysis results are subject to a certain degree of uncertainty due to unpredictable factors such as climate policies, economic growth, and energy structure transition. The identified climate-related risks and opportunities and their corresponding levels in this table are based on the 2022 Tencent Climate Risk Assessment results and have remained unchanged over the past three years.

2. The potential impact level of physical risks considers the potential impacts of acute and chronic climate events. Note that different climate-related risks, such as flooding and water stress and drought, can be high at the same location, as these events may occur and generate impacts at different times and locations.

3. The Wildfire indicator assesses the likelihood of weather conditions that are favourable for the occurrence of wildfires; however, it does not consider vegetation that is essential for wildfire events.

Transition risks	Category	Potential impact	Potential impact level		
			2030	2040	2050
Enhanced regulatory requirements on energy efficiency		<ul style="list-style-type: none"> Increased capital and operating costs for improving energy efficiency in compliance with regulatory requirements. 	Low	Low	Low
Enhanced climate-related regulatory requirements	Policy and legal	<ul style="list-style-type: none"> Increased operating costs associated with climate response measures, management, and information disclosure enhancement due to climate-related policies. 	Low	Moderate	Moderate
Implementation of carbon emission control policies		<ul style="list-style-type: none"> Increased capital and operating costs associated with the potential purchase of carbon emission allowances or investment in carbon reduction activities following the implementation of the carbon emission allowance system; Increased operating costs due to higher prices of carbon emission allowances or carbon credits. 	High	High	High
Uncertainty around the procurement of renewable energy	Market	<ul style="list-style-type: none"> Increased operating costs due to fluctuation of the renewable energy supply market; Increased operating costs due to the increase in green electricity prices. 	Low	Low	Low
Electricity price fluctuations		<ul style="list-style-type: none"> Increased operating costs due to increased electricity prices resulting from power supply issues. 	Low	Very low	Very low
Shifting market preferences in low-carbon products		<ul style="list-style-type: none"> Potential loss of market share as customers shift to low-carbon products and services to meet their own carbon reduction targets. 	Low	Moderate	Moderate
Potential greenwashing risk	Reputation	<ul style="list-style-type: none"> Inconsistency between climate response communication and standards/guidelines, leading to questions about exaggerated performance and greenwashing. 	Low	Low	Low

Opportunity	Category	Potential impact	Potential opportunity level		
			2030	2040	2050
On-site renewable energy generation	Energy	<ul style="list-style-type: none"> Adoption of renewable energy facilities may reduce operating costs. 	Low	Low	Moderate
Adoption of energy efficiency measures		<ul style="list-style-type: none"> Reduced operating costs due to the application of energy efficiency measures to reduce energy consumption. 	Low	Low	Low
Climate investment and financing for renewable energy and low-carbon solutions	Market	<ul style="list-style-type: none"> Increased revenue from the external sale of renewable energy generated. 	Low	Low	Low
Market opportunities for low-carbon products	Products and services	<ul style="list-style-type: none"> Increased market share by offering low-carbon products aligned with customer preferences and carbon neutrality targets; Increased revenue arising from providing solutions for a low-carbon digitalisation shift in the economy. 	Low	Moderate	High

We have developed a climate transition plan and implemented measures to strengthen our capacity to mitigate and adapt to climate-related risks, ensuring the Company can effectively manage the identified physical and transition risks. We fund these measures from internal resources, with relevant investments incorporated into our annual expenditure planning. We have assessed the anticipated financial effects, considering the transition plan, and identified no material effects related to climate change on our financial position or financial performance. As these risks are influenced by highly unpredictable external variables over the medium to long term, numerical estimates may not provide decision-useful information to investors at this stage. We will continue to monitor and evaluate climate-related risks and opportunities that could have effect on our financial performance and financial position.

Table 4 Key Climate-related Risks, Opportunities and Responses

Key physical risks	Extreme heat	Flooding and typhoon	Water stress and drought
Mitigation and adaptation measures	<ul style="list-style-type: none"> Factor in climate when selecting sites for data centres and utilise natural conditions to cool equipment; Improve energy efficiency and reduce cooling energy consumption through technologies including T-Block and high-efficiency air conditioning; Strengthen the heat resistance and resilience of electrical facilities, for example, by adopting dual power supply cooling systems. 	<ul style="list-style-type: none"> Factor in flooding when selecting sites for data centres and office buildings; Build and maintain facilities to cope with extreme weather, for example, flood gates, secondary drainage systems, sealed power and fibre ducts; Servers, cooling systems and other critical equipment are located in areas that comply with specified flood protection and wind resistance requirements. 	<ul style="list-style-type: none"> Factor in the impacts on surrounding water resources during the site selection process for data centres and office buildings; Adopt waterless cooling systems for air conditioning units; Implement water-saving equipment and retrofit existing equipment for water saving to enhance the efficiency of water use; Apply rainwater harvesting and reuse techniques; Consider the availability of alternative water resources in the event of water shortages and install backup water facilities, including backup water trucks.
Key transition risks and opportunities	Implementation of carbon emission control policies	Enhanced climate-related regulatory requirements	Market opportunities for low-carbon products
Mitigation and adaptation measures	<ul style="list-style-type: none"> Strengthen internal carbon management, promote the development of internal energy-saving and emission reduction technologies and explore an internal carbon pricing mechanism; Participate in carbon trading; Support the innovation and application of low-carbon technologies, while advancing nature-based solutions and the development of carbon sink methodologies. 	<ul style="list-style-type: none"> Apply AI technologies in energy conservation to improve data centre energy efficiency and enhance the PUE performance; Increase procurement of green electricity and deployment of renewable energy infrastructure; Disclose climate-related information in alignment with the latest global disclosure standards. 	<ul style="list-style-type: none"> Reduce the carbon footprint of our products and services and provide low-carbon options to customers; Provide customers with digital solutions to support their low-carbon transition.

Nature Strategy

In accordance with the TNFD LEAP approach, we conducted a preliminary screening using the ENCORE¹ tool, jointly developed by the United Nations Environment Programme World Conservation Monitoring Centre and the United Nations Environment Programme Finance Initiative, to identify potential nature-related impacts and dependencies across our operations and value chain. We used the WWF risk filter tool to assess physical and transition risks and opportunities related to nature. The assessment indicates that our nature-related dependencies, impacts and risks are limited, and we continue to undertake nature conservation actions.

Table 5 Datasets and Tools Used in Our Nature Assessment

Steps	Datasets and tools
<p>Step 1: Locate the interface with nature</p>	<p>Biodiversity Importance:</p> <ul style="list-style-type: none"> • Critical Habitat² • Biodiversity Hotspots³ • Mean Species Abundance⁴ <p>Ecosystem Integrity:</p> <ul style="list-style-type: none"> • ESRI Sentinel-2 Satellite Imagery⁵ • Ecoregion and Nature Needs Half Ecoregions⁶ <p>Water Physical Risk:</p> <ul style="list-style-type: none"> • 100 Priority Basins⁷ • Baseline Water Stress⁸
<p>Step 2: Evaluate dependencies and impacts</p>	<p>ENCORE</p>
<p>Step 3: Assess risks and opportunities</p>	<p>WWF Biodiversity Risk Filter⁹</p>

1. Exploring Natural Capital Opportunities, Risks and Exposure ("ENCORE") enables analysis of nature-related impacts and dependencies by connecting economic activities with their interconnections with natural capital. Published by Natural Capital Finance Alliance.

2. Global Critical Habitat Screening is categorised as unclassified, potential, or likely based on critical habitat criteria. Likely sites have a higher chance of becoming essential habitat. Published by UNEP-WCMC.

3. Biodiversity hotspots are areas with high species diversity threatened by habitat degradation. Identified by Conservation International, they guide focused conservation efforts. Published by Hoffman et al.

4. Mean Species Abundance (MSA) measures biodiversity intactness on a scale from 0 to 1, with 0 indicating total loss and 1 indicating full intactness. Published by GloBio.

5. Land Cover is assessed by ESRI Sentinel-2 Satellite Imagery; this data quantifies blue-green space coverage. Published by ESRI Inc.

6. Ecoregion and Nature Needs Half (NNH) Ecoregions, classified into Nature Needs Half categories, represent biodiversity assemblages. Categories include Half Protected, Nature Could Reach Half, Nature Could Recover, and Nature Imperilled. Published by Dinerstein et al.

7. 100 Priority Basins is the identified basins with significant potential for collaborative initiatives, considering economic opportunities and shared water risk. Published by The UN Global Compact Office and Pacific Institute.

8. Baseline Water Stress is categorised from low to extremely high, it reflects water availability and withdrawals. Published by World Resources Institute (WRI).

9. WWF Risk Tool with its Biodiversity Risk Filter is a corporate-level screening tool to identify biodiversity risks and help corporations prioritise actions for biodiversity conservation.

Risk Management¹

We have established a climate- and nature-related risk management process to identify, assess, manage and monitor risks that may affect our business. Climate-related risks are integrated into the Company's overall risk assessment and internal control processes.

Table 6 Climate- and Nature-related Risk Management Process

Climate	Nature
<p>Step 1: Risk inventory and identification</p> <ul style="list-style-type: none"> Analyse sectoral and peer best practices; Identify climate risks and opportunities aligned with the TCFD categories; Generate a long list of climate-related risks and opportunities. 	<p>Step 1: Locate the interface with nature</p> <ul style="list-style-type: none"> Geolocate operation sites; Use various datasets to identify sensitive locations at the asset level.
<p>Step 2: Risk assessment and scenario analysis</p> <ul style="list-style-type: none"> Select low and high carbon climate scenarios; Select appropriate time horizons (short-, medium-, and long-term) to assess climate impacts; Collect the information on assets and business development strategy; Conduct internal stakeholder interviews to understand the operational status quo; Conduct scenario analysis at sector and asset levels to identify material climate risks and opportunities, where the materiality is determined based on the likelihood and impact of risks and opportunities. 	<p>Step 2: Evaluate dependencies and impacts</p> <ul style="list-style-type: none"> Identify and evaluate the dependencies and impact drivers associated with our business operations and value chain at the sector level.
<p>Step 3: Impact assessment of risks and opportunities</p> <ul style="list-style-type: none"> Conduct qualitative analysis of climate impacts on business strategy and financial planning; Conduct quantitative analysis of climate-related financial impacts. 	<p>Step 3: Assess risks and opportunities</p> <ul style="list-style-type: none"> Identify and assess our nature-related risks and opportunities.
<p>Step 4: Risk management and response</p> <ul style="list-style-type: none"> Enhance climate risk response measures for key climate-related risks and opportunities; Monitor and evaluate the progress of improvements in risk management practices based on the regular reports from each business unit. 	<p>Step 4: Prepare to respond</p> <ul style="list-style-type: none"> Respond to key risks through risk management and mitigation measures.

1. This year, we follow the same approach to climate risk identification, assessment, prioritisation, and management.

Metrics and Targets

Climate- and nature-related metrics and targets have been developed in accordance with the HKEX ESG Reporting Code while referencing the IFRS S2/TCFD. An internal carbon price of RMB110 per tonne of CO₂e was set for 2025 and will be reviewed annually. The price is used as a decision-support metric in evaluating decarbonisation initiatives and major capital investments, where appropriate.

The Company announced its carbon neutrality plan in 2021 and completed a mid-term assessment in 2025, confirming that it stays firmly on course to reach carbon neutrality by 2030. The Company is considering the Hong Kong Stock Exchange's requirement of integrating climate-related factors into its remuneration policy.

Table 7 Climate- and Nature-related Targets

Category	Targets
Climate	By 2030, achieve carbon neutrality in our operations and supply chain.
	Scope 1 and Scope 2: By 2030, reduce absolute emissions by 70% from 2021 base year.
	Scope 3: By 2030, reduce absolute emissions by 30% from 2021 base year.
	By 2050, achieve net-zero emissions.
	Greenhouse gases
	Energy¹
	By 2026, use 100% green electricity for owned data centres.
	By 2030, achieve 100% green electricity consumption.
	The average PUE of owned data centres does not exceed 1.250.
Nature	Water resources²
	By 2030, improve water usage effectiveness of owned data centres by 20% from 2025 base year.
	Waste
	Implement waste sorting in all owned office buildings in the Chinese Mainland.
	Ensure 100% of discarded lead-acid batteries are disposed of by qualified institutions.

1. We achieved the energy target set in 2019: by 2025, electricity consumption per employee in owned office buildings in the Chinese Mainland decreased 28% from the 2019 baseline, exceeding the 15% target.

2. We achieved the water target set in 2019: by 2025, water consumption per employee in owned office buildings in the Chinese Mainland decreased 16% from the 2019 baseline, exceeding the 15% target.

Table 8 Environmental Data

Indicators ¹	Year ended 31 December			
	2025	2024	2023	
Greenhouse gases	Total GHG emissions (Scopes 1, 2, 3) (tCO ₂ e) ^{2,3,4}	5,965,348.0	6,056,610.1	5,793,823.7
	Total GHG emissions per unit of revenue (tCO ₂ e/RMB million) ^{2,3,4}	7.9	9.2	9.5
	Scope 1 emissions (tCO ₂ e)	78,025.7	121,466.0	275,373.5
	Scope 2 emissions (tCO ₂ e) ⁵	2,548,941.3	2,863,848.7	2,561,328.3
	Scope 3 emissions (tCO ₂ e)	3,338,381.0	3,071,295.4	2,957,122.0
Energy	Total energy consumption (MWh) ⁶	8,715,193.3	6,476,849.0	5,165,168.2
	Total energy consumption per unit of revenue (MWh/RMB million)	11.6	9.8	8.5
	Direct energy consumption (MWh)	34,065.8	34,702.7	37,373.3
	Gasoline (L)	94,337.1	95,428.2	91,118.9
	Diesel (L)	823,754.8	725,147.5	1,208,688.0
	Natural gas (m ³)	2,316,979.1	2,465,131.0	2,272,886.4
	Indirect energy consumption (MWh)	8,681,127.5	6,442,146.3	5,127,794.9
	Electricity consumption (MWh)	8,669,131.7	6,429,609.9	5,114,669.0
	Other indirect energy consumption (MWh) ⁷	11,995.8	12,536.4	13,125.9
	Green electricity consumption (MWh)	4,207,986.8	1,416,661.9	632,588.6
	Green electricity procurement (MWh) ⁸	4,133,335.7	1,364,625.9	604,277.1
	On-site renewable energy (MWh)	74,651.1	52,035.9	28,311.5
	Percentage of green electricity consumption (%)	48.5	22.0	12.4

Indicators ¹	Year ended 31 December			
	2025	2024	2023	
Water resources	Water consumption (tonnes) ⁹	12,151,404.1	10,370,588.3	8,191,328.4
	Water consumption per unit of revenue (tonnes/RMB million)	16.2	15.7	13.5
Waste ¹⁴	Electronic equipment reused (tonnes) ¹⁰	4,980.3	4,380.8	4,298.5
	Electronic waste recycled (tonnes) ¹¹	759.9	649.0	369.7
	Non-hazardous waste disposed (tonnes) ¹²	33,617.5	33,097.8	46,536.4
	Non-hazardous waste disposal per unit of revenue (kg/RMB million)	44.7	50.1	76.4
	Hazardous waste disposed (tonnes) ¹³	4,601.4	3,105.8	1,321.7
	Hazardous waste disposal per unit of revenue (kg/RMB million)	6.1	4.7	2.2

Notes:

- In 2025, the scope of environmental data was expanded to include the Group Headquarters and our directly managed wholly-owned subsidiaries, excluding Tencent Music Entertainment Group and China Literature Limited. The impact of this expansion on historical data was assessed and found to be immaterial.
- Our emissions are mainly GHG emissions. The GHG emissions cover all seven greenhouse gases as defined by the Kyoto Protocol: carbon dioxide ("CO₂"), methane ("CH₄"), nitrous oxide ("N₂O"), hydrofluorocarbons ("HFCs"), perfluorocarbons ("PFCs"), sulphur hexafluoride ("SF₆"), and nitrogen trifluoride ("NF₃").
- Our GHG emissions have been calculated in accordance with the GHG Protocol Corporate Accounting and Reporting Standard, the SBTi Guidance for ICT Companies Setting Science Based Targets and ISO 14064-1 Greenhouse gases. We regard carbon offsetting as a supplementary measure to our green electricity transition and emission reduction efforts and have not used carbon credits to offset emissions to date. The GHG emissions (Scope 1, 2, 3) have been verified by SGS.
- Total GHG emissions are calculated using the market-based method. In 2025, our Scope 2 emissions using the location-based method were 4,906,182.6 tCO₂e.
- Scope 2 emissions from electricity consumption in China are calculated using the National Grid Average CO₂ Emission Factor published by the Ministry of Ecology and Environment of the People's Republic of China.
- The total energy consumption is calculated with reference to the coefficients in the National Standards of the People's Republic of China General Rules for Calculation of the Comprehensive Energy Consumption (GB/T 2589-2020).
- Other energy consumption includes purchased heat.
- Including power purchase agreements and green electricity certificates.
- Water usage comes from the municipal water supply and there are no issues in sourcing water.
- Reused electronic equipment includes old servers and the accessories.
- We practice the 3R principle in the disposal of electronic waste. We demagnetise and crush waste hard disks to ensure information security, and the destroyed hard disks are recycled by qualified institutions.
- Non-hazardous waste includes office waste, food waste and used electronic equipment (laptops, monitors, servers, etc.).
- Hazardous waste generated in office buildings includes waste toner cartridges and ink cartridges from our printers. Hazardous waste produced by data centres includes discarded lead-acid batteries and destroyed hard disk components. We transfer 100% of our hazardous waste to certified third-party providers for proper disposal.
- As we primarily provide online products and services, data related to packaging materials are not applicable.

Workforce-related Information

Indicators ^{1,2}	Year ended 31 December		
	2025	2024	2023
Total number of employees	87,412	81,740	76,239
Number of employees by age group			
Under 30	34,911	33,113	30,968
30 to 50	52,072	48,271	44,963
Over 50	429	356	308
Number of employees by gender			
Male	58,812	55,293	51,514
Female	28,600	26,447	24,725
Employment			
Number of employees by management level			
Management	6,920	6,451	6,861
Non-management	80,492	75,289	69,378
Number of employees by geographic region			
Chinese Mainland	85,460	79,768	74,398
Others	1,952	1,972	1,841
Number of employees by employment type			
Permanent employees	87,412	81,740	76,239
Other categories	5,566	3,424	2,615
Total turnover rate	15.9%	20.1%	23.9%
Employee turnover rate by age group			
Under 30	21.5%	27.7%	33.0%
30 to 50	12.1%	14.8%	17.0%
Over 50	18.6%	20.5%	20.3%
Employee turnover ³			
Employee turnover rate by gender			
Male	15.2%	18.7%	21.7%
Female	17.4%	22.9%	28.4%
Employee turnover rate by geographic region			
Chinese Mainland	15.7%	20.1%	23.9%
Others	22.4%	19.4%	22.1%

Indicators ^{1,2}	Year ended 31 December		
	2025	2024	2023
Number of work-related fatalities	0	0	0
Work-related fatality rate (number of fatalities/millions of hours worked) ⁵	0.00	0.00	0.00
Health and safety ⁴			
Number of work-related injuries	79	69	37
Work-related injury rate (number of injuries/millions of hours worked) ⁶	0.46	0.42	0.24
Working days lost due to work-related injuries	2,671	2,992	1,548
Percentage of employees who received training (by gender)			
Male	96.7%	96.4%	93.3%
Female	89.3%	92.2%	83.6%
Percentage of employees who received training (by management level)			
Management	95.9%	95.9%	98.7%
Non-management	94.1%	95.0%	89.3%
Training and development ⁷			
Average hours of training received by employees (by gender)			
Male	19.1	15.5	12.2
Female	19.1	14.9	12.1
Average hours of training received by employees (by management level)			
Management	32.7	21.3	14.4
Non-management	17.9	14.8	11.9

Notes:

- Employees are defined as permanent employees of the Company, which includes the Group Headquarters and its directly managed wholly-owned subsidiaries. Other categories include consultants and interns from the same entities.
- In 2025, the scope of workforce data was expanded to include the Group Headquarters and our directly managed wholly-owned subsidiaries, excluding Tencent Music Entertainment Group and China Literature Limited. The total number of employees in Tencent 2025 Annual Report and annual results announcement was 115,849, including employees of the Group Headquarters, subsidiaries, and consolidated investment companies.
- The employee turnover includes the number of permanent employees who have left due to resignation, dismissal, or retirement.
- The data refer to cases recorded by Human Resources team and verified by Human Resources and Social Security Bureau. In the Chinese Mainland, such cases, if any, are reported by Human Resources team and verified by local branches of Human Resources and Social Security Bureau. The restated figures for 2023 reflect the gradual return to the workplace and lower business travel volumes post-COVID-19.
- The work-related fatality rate represents the number of recorded fatalities per million hours worked.
- The work-related injury rate represents the number of recorded injuries per million hours worked.
- Tencent Academy provides curated training programmes accessible to permanent employees of the Group Headquarters. These programmes are currently partially open to permanent employees of our directly managed wholly-owned subsidiaries.

List of Security Certifications

Tencent Cloud has obtained the following security certifications:

	Classified protection of cybersecurity (China)
	The security assessment of cloud computing service (Enhanced level) (China)
	Trusted cloud security assessment (China)
	ITSS cloud computing service capability certification (China)
	CCRC Information security service qualification certification (China)
	China information technology security centre certification (China)
	IT product information security EAL4 certification (Enhanced level) (China)
	China cybersecurity product-specific certification (China)
	Data security management certification (China)
	SOC 1, SOC 2, SOC 3 compliance audit (International)
Cybersecurity	ISO 27001:2022 Information security, cybersecurity and privacy protection – Information security management systems – Requirements (International)
	ISO 27017:2015 Information technology – Security techniques – Code of practice for information security controls based on ISO 27002 for cloud services (International)
	Cloud security alliance (CSA) STAR certification (Gold Medal) (International)
	NIST cybersecurity framework (USA)
	CIS benchmarks certification (USA)
	Multi-Tier cloud security (MTCS) standard for Singapore certification (Singapore)
	SNI 27001 certification (Indonesia)
	Korea-Information security management system certification (South Korea)
	C5 Cloud computing compliance controls catalog (Germany)
	TISAX automotive industry information security assessment (Germany)
Artificial Intelligence Governance	ISO 42001 Artificial intelligence management system (International)

	ISO 27701:2019 Security techniques – Extension to ISO 27001 and ISO 27002 for privacy information management – Requirements and guidelines (International)
	ISO 29151:2017 Information technology – Security techniques – Code of practice for personally identifiable information protection (International)
	BS 10012: 2017 Personal information management system (International)
Privacy Protection	ISO 27018:2019 Information technology – Security techniques – Code of practice for protection of personally identifiable information (PII) in public clouds acting as PII processors (International)
	ISO 27799:2016 Health informatics – Information security management in health using ISO 27002 (International)
	Data protection trustmark (Singapore)
	Cyber TrustMark certification (Singapore)
	Payment card industry (PCI) data security standard (DSS) Certification (International)
	Financial compliance audit (Outsourced service provider audit Report, Singapore) (Singapore)
	Securities and exchange commission (SEC) rule 17a-4 (USA)
	Financial industry IT security compliance self-Assessment (HKMA/HKIA/SFC) (Hong Kong, China)
Financial Regulatory Adherence	Financial industry IT self-assessment of safety compliance (FISC) (Japan)
	Financial industry IT compliance audit (Indonesia)
	Financial industry IT compliance audit (Pilipinas)
	Financial industry IT compliance audit (Thailand)
	Financial industry IT compliance audit (Malaysia)
	ISO 22301:2019 Security and resilience – Business continuity management systems – Requirements (International)
	ISO 9001:2015 Quality management systems – Requirements (International)
Business Continuity and Others	ISO 20000-1:2018 Information technology – Service management – Requirements (International)
	ISO 14001:2015 Environmental management systems – Requirements with guidance for use (International)
	ISO 50001:2018 Energy management systems – Requirements with guidance for use (International)

Assurance and Verification

Limited Assurance Report on Sustainability Information



Independent practitioner's limited assurance report on Tencent Holdings Limited's sustainability information

To the board of directors of Tencent Holdings Limited

Limited assurance conclusion

We have conducted a limited assurance engagement on the sustainability information of Tencent Holdings Limited (the "Company") as summarised in the accompanying appendix.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Sustainability Information is not prepared, in all material respects, in accordance with the criteria applied as explained in the appendices to the Company's 2025 ESG report headed "About This Report", "Climate- and Nature-related Information" and "Workforce-related Information" (the "Criteria").

Basis for conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements ISAE 3000 (Revised), *Assurance engagements other than audits or reviews of historical financial information* ("ISAE 3000 (Revised)"), issued by the International Auditing and Assurance Standards Board (the "IAASB").

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. Our responsibilities under this standard are further described in the Practitioner's responsibilities section of our report.

Our independence and quality management

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the HKICPA, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management 1 issued by the IAASB, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

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Responsibilities for the Sustainability Information

Management of the Company is responsible for:

- the preparation of the Sustainability Information in accordance with the Criteria;
- designing, implementing and maintaining such internal control as management determines is necessary to enable the preparation of the Sustainability Information, in accordance with the Criteria, that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

Those charged with governance are responsible for overseeing the Company's sustainability reporting process.

Inherent limitations in preparing the Sustainability Information

The absence of a significant body of established practice upon which to draw to evaluate and measure non-financial information allows for different, but acceptable, evaluation and measurement techniques that can affect comparability between entities, and over time.

Practitioner's responsibilities

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the Sustainability Information is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. We report our conclusion solely to you, as a body, in accordance with our agreed terms of engagement, and for no other purpose. We do not assume responsibility towards or accept liability to any other person for the contents of this report. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Sustainability Information.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), we exercise professional judgement and maintain professional scepticism throughout the engagement. We also:

- determine the suitability in the circumstances of the Company's use of the Criteria as the basis for the preparation of the Sustainability Information;
- perform risk assessment procedures, including obtaining an understanding of internal control relevant to the engagement, to identify where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Company's internal control; and
- design and perform procedures responsive to where material misstatements are likely to arise in the Sustainability Information. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

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Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the Sustainability Information. The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of where material misstatements are likely to arise in the Sustainability Information, whether due to fraud or error.

In conducting our limited assurance engagement, we:

- Obtained an understanding of the Company's reporting processes relevant to the preparation of its Sustainability Information by:
 - Making inquiries of the persons responsible for the Sustainability Information;
 - Understanding the process for collecting and reporting the Sustainability Information.
- Evaluated the appropriateness of measurement and evaluation methods, reporting policies used and estimates made by the Company.
- Performed limited substantive testing on a selective basis of the Sustainability Information, which is aggregated from information submitted by the Company's office in Shenzhen. Testing involved: agreeing arithmetical accuracy and agreeing data points to or from source information to check that the Sustainability Information had been appropriately evaluated or measured, recorded, collated and reported.
- Considered the disclosure and presentation of the ESG report prepared in accordance with underlying records and the ESG Reporting Code, Appendix C2 to the Main Board Listing Rules by the Stock Exchange of Hong Kong Limited.

PricewaterhouseCoopers
Certified Public Accountants
Hong Kong, 7 April 2026

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APPENDIX

Tencent Holdings Limited Selected Sustainability Information

Environmental Data

Energy		For the year ended 31 December 2025	
Total energy consumption	MWh	8,715,193.3	
Total energy consumption per unit of revenue	MWh/RMB million	11.6	
Direct energy consumption	MWh	34,065.8	
Gasoline	L	94,337.1	
Diesel	L	823,754.8	
Natural gas	m ³	2,316,979.1	
Indirect energy consumption	MWh	8,681,127.5	
Electricity consumption	MWh	8,669,131.7	
Other indirect energy consumption	MWh	11,995.8	
Green electricity consumption	MWh	4,207,986.8	
Green electricity procurement	MWh	4,133,335.7	
On-site renewable energy	MWh	74,651.1	
Percentage of green electricity consumption	%	48.5	
Share of green electricity in owned data centres	%	82.9	
Share of green electricity in leased data centres	%	21.4	
Average PUE of owned data centres		1.246	
		As at 31 December 2025	
Installed capacity of renewable energy facilities deployed at owned data centres	MW	63.8	

Water resources

Water resources		For the year ended 31 December 2025	
Water consumption	tonnes	12,151,404.1	
Water consumption per unit of revenue	tonnes/RMB million	16.2	
Water Usage Effectiveness (WUE) of owned data centres	L/kWh	1.50	

Waste

Waste		For the year ended 31 December 2025	
Electronic equipment reused	tonnes	4,980.3	
Electronic waste recycled	tonnes	759.9	
Non-hazardous waste disposed	tonnes	33,617.5	
Non-hazardous waste disposal per unit of revenue	kg/RMB million	44.7	
Hazardous waste disposed	tonnes	4,601.4	
Hazardous waste disposal per unit of revenue	kg/RMB million	6.1	

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APPENDIX

Workforce-related Information

Employment		As at 31 December 2025	
Total number of employees		87,412	
Number of employees by age group			
Under 30		34,911	
30 to 50		52,072	
Over 50		429	
Number of employees by gender			
Male		58,812	
Female		28,600	
Number of employees by management level			
Management		6,920	
Non-management		80,492	
Number of employees by geographic region			
Chinese Mainland		85,460	
Others		1,952	
Number of employees by employment type			
Permanent employees		87,412	
Other categories		5,566	

Employee turnover

Employee turnover		For the year ended 31 December 2025	
Total turnover rate		15.9%	
Employee turnover rate by age group			
Under 30		21.5%	
30 to 50		12.1%	
Over 50		18.6%	
Employee turnover rate by gender			
Male		15.2%	
Female		17.4%	
Employee turnover rate by geographic region			
Chinese Mainland		15.7%	
Others		22.4%	

Health and safety

Health and safety		For the year ended 31 December 2025	
Number of work-related fatalities	Number	0	
Work-related fatality rate	number of fatalities / millions of hours worked	0.00	
Number of work-related injuries	Number	79	
Work-related injury rate	number of injuries / millions of hours worked	0.46	
Working days lost due to work-related injuries	Working days	2,671	

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APPENDIX

Training and development

Training and development		For the year ended 31 December 2025	
Percentage of employees who received training (by gender)			
Male		96.7%	
Female		89.3%	
Percentage of employees who received training (by management level)			
Management		95.9%	
Non-management		94.1%	
Average hours of training received by employees (by gender)			
Male		19.1	
Female		19.1	
Average hours of training received by employees (by management level)			
Management		32.7	
Non-management		17.9	

Sustainable Supply Chain

Sustainable Supply Chain		As at 31 December 2025	
Number of suppliers by geographic region			
China		25,219	
Other countries and regions		4,954	

Customer Service

Customer Service		For the year ended 31 December 2025	
Number of user complaints handled by customer service system for consumer Internet businesses	million	186	
Number of user complaints handled by customer service system for Industrial Internet businesses	number	10,561	

Business Ethics

Business Ethics		For the year ended 31 December 2025	
Number of results of employee corruption-related cases received		8	

Tech for Good Supporting Sustainable Development Goals

Tech for Good Supporting Sustainable Development Goals		As at 31 December 2025	
Cumulative expenditure on Sustainable Social Value initiatives	RMB billion	15.7	

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Greenhouse Gas Verification Statement



Statement of Conformity CN26/00002120
Greenhouse Gas Verification Statement
 The inventory of Greenhouse Gas emissions in
 01 Jan. 2025 to 31 Dec. 2025 of

Tencent Holdings Limited

Business address: Tencent Binhai Towers No. 33 Haitian 2nd Road, Nanshan District
 Shenzhen, Guangdong Province, China.

has been verified in accordance with ISO 14064-3:2019 as meeting the requirements of

ISO 14064-1:2018

Direct Emissions	
78,025.70 tonnes of CO₂e	
Indirect Emissions	
	5,887,322.25 (Market-based) tonnes of CO₂e
Total Emissions Quantified	
	5,965,347.95 (Market-based) tonnes of CO₂e

The specific categories of indirect greenhouse gas emissions are detailed in the appendix of this statement, which is an integral part of this statement




Authorised by
 David Xin
 Sr. Director - Business Assurance
 DATE: 10 Mar. 2026

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SGS has been contracted by Tencent Holdings Limited (hereinafter referred to as "CLIENT"), for the verification of direct and indirect Greenhouse Gas emissions in accordance with

ISO 14064-3:2019

as provided by Tencent Holdings Limited (hereinafter referred to as "RESPONSIBLE PARTY"), in the Greenhouse Gas (GHG) Assertion in the form of GHG Report covering GHG emissions of the period 01 Jan. 2025 to 31 Dec. 2025 (hereinafter referred to as "REPORT PERIOD").

Roles and responsibilities
 The management of the RESPONSIBLE PARTY is responsible for the organization's GHG information system, the development and maintenance of records and reporting procedures in accordance with that system, including the calculation and determination of GHG emissions information and the reported GHG emissions.
 It is SGS's responsibility to express an independent GHG verification opinion on the GHG statement as provided by the RESPONSIBLE PARTY for the REPORT PERIOD.

According to ISO 14064-3:2019, SGS has conducted a third-party verification of the provided GHG statement by RESPONSIBLE PARTY against the requirements of ISO 14064-1:2018 in the period 26-27 Feb. 2026, 04 Mar. 2026, 09-10 Mar. 2026. The verification is based on the verification scope, objectives and criteria as agreed between the CLIENT and SGS on 26 Feb. 2026.

Level of Assurance
 The level of assurance agreed is that of Reasonable assurance.


Scope
 The CLIENT has commissioned an independent verification by SGS in according to ISO 14064-3:2019 to assure the reported GHG emissions of RESPONSIBLE PARTY, in conformance with ISO 14064-1:2018 requirements within the scope of the verification as outlined below. The data and information supporting the GHG statement is historical in nature.

This engagement covers verification of emission from anthropogenic sources of greenhouse gases included within the organization's boundary:

- The organizational boundary is established following Operational control approach
- Location/boundary of the activities
- Physical infrastructure, activities, technologies and processes: Communication and Social, Digital Content, Games, Online Advertising, FinTech, Cloud and Other Business Services.
- GHG sources, sinks and/or reservoirs included: GHG sources as presented in the GHG inventory and report of the RESPONSIBLE PARTY
- Types of GHGs included: CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃
- GHG information for the following period was verified: 01 Jan. 2025 to 31 Dec. 2025
- GWP adopted: IPCC 6 Assessment Report.
- Intended user of the verification statement: Stakeholders information request.

Objective
 The purposes of this verification exercise are, by review of objective evidence, to independently review:

- Whether the GHG emissions are as declared by the organization's GHG statement
- The data reported are accurate, complete, consistent, transparent and free of material error or omission.



Criteria
 Criteria against which the verification assessment is undertaken are the requirements of ISO 14064-3:2019.

Materiality
 The materiality required of the verification is considered by SGS to 5%, based on the needs of the intended user of the GHG statement.

Verification approach
 SGS's approach is risk-based, drawing on an understanding of the risks associated with reporting GHG emissions information and the controls in place to mitigate these. Our examination includes assessment of evidence relevant to the amounts and disclosures in relation to the organization's reported GHG emissions

We plan and perform our work to obtain the information, explanations and evidence that we considered necessary to provide a reasonable level of assurance that the GHG emissions for the REPORT PERIOD are fairly stated.

We conduct our verification with regard to the GHG statement of GHG Report of the RESPONSIBLE PARTY which includes assessment of GHG information system and reporting plan/protocol. This assessment includes the collection of evidence supporting the reported data, and checking whether the provisions of the protocol reference, are consistently and appropriately applied.

Verification opinion conclusion
 The RESPONSIBLE PARTY provided the GHG statement based on the requirements of ISO 14064-1:2018 that total emission 5,965,347.95 (Market-based) tonnes of CO₂e in the organization boundary for the REPORT PERIOD.

The verification opinion as below is issued by SGS after an independent verification for RESPONSIBLE PARTY's GHG statement base on agreed Reasonable assurance:





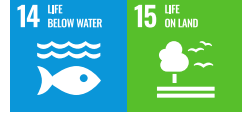
Unmodified
 The GHG statement submitted by RESPONSIBLE PARTY is prepared in accordance with ISO 14064-1:2018 on GHG quantification and reporting, is a fair representation materially, the GHG data and information in statement are explicit and supported by adequacy and appropriate evidence.

Modified
 The GHG statement submitted by RESPONSIBLE PARTY has no material misstatement, however has some deficiencies which will prevent the issuance of unmodified verification opinion.

Adverse opinion
 The GHG statement submitted by RESPONSIBLE PARTY:
 - has no material misstatement or
 - there is insufficient or inappropriate evidence to support an unmodified or modified opinion.

Disclaiming the issuance of an opinion
 It is unable to obtain sufficient and appropriate objective evidence to form an opinion as to whether the GHG statement submitted is presented fairly in accordance with ISO 14064-1:2018

Reporting Frameworks and Content Indices

Reporting Frameworks	HKEX ESG Reporting Code	TCFD	SASB	SDGs	UNGC
About Tencent					
Executive Summary					
Chapter 1 ESG Governance					
ESG Governance Structure	Part B: Governance Structure				
Board Statement	Part B: Governance Structure	Governance – (b)			
ESG Strategy					
Commercial Value, Social Value, and Shareholder Value					
ESG Materiality Assessment	Part B: Reporting Principles				
Annual Review of ESG Working Group					
Chapter 2 Corporate Governance					
Board Governance, Independence and Diversity					
Risk Management		Risk Management – (b)			Principle 10
Business Ethics	Part C: B7, B7.1, B7.2, B7.3				
Sustainable Supply Chain	Part C: B5, B5.1, B5.2, B5.3, B5.4				
Chapter 3 Product Governance					
Data Privacy	Part C: B6, B6.5		TC-IM-220a.1		
Cyber and Data Security	Part C: B6		TC-IM-230a.1, TC-IM-230a.2		Principle 1, Principle 2
Responsible Artificial Intelligence	Part C: B6				
Trustworthy Internet Platform	Part C: B6, B6.2, B6.3		TC-IM-220a.1		
Chapter 4 Environmental Protection					
Environmental Strategy and Progress	Part C: A1, A2, A3				
Climate Change and Carbon Neutrality	Part C: A1, A1.1, A1.5, A2, A2.3, A3, A3.1	Governance – (a) and (b); Strategy – (a), (b) and (c)	TC-IM-130a.1, TC-IM-130a.3		Principle 7, Principle 8, Principle 9
Biodiversity Loss and Nature Conservation	Part C: A1, A1.6, A2, A2.4, A3, A3.1				

Reporting Frameworks

HKEX ESG Reporting Code¹

TCFD

SASB

SDGs

UNGC

Chapter 5 Caring for Our People

Our Approach and Commitments	Part C: B1, B2, B3, B4				Principle 1, Principle 2, Principle 3, Principle 4, Principle 5, Principle 6
Development and Well-being of Our People	Part C: B1, B2, B2.3, B3, B4, B4.1, B4.2		TC-IM-330a.2		
Diverse, Inclusive, and Collaborative Workplace	Part C: B1		TC-IM-330a.3		

Chapter 6 Digital Inclusion

Development of Minors					Principle 1
Empowerment of the Silver Generation					
Skill Development for People with Disabilities					
Inclusive Healthcare for Women					
Supporting Rural Development					
Inclusive Financial Products and Services					

Chapter 7 Tech for Good Supporting SDGs

Basic Sciences Research	Part C: B8, B8.1, B8.2			
Digital Upgrade of the Philanthropic Sector	Part C: B8, B8.1, B8.2			
Cultural Heritage and Inclusive Access	Part C: B8, B8.1, B8.2			
Emergency Preparedness	Part C: B8, B8.1, B8.2			
Digital and Intelligent Upgrade of Industries	Part C: B8, B8.1, B8.2			

Appendix

About This Report	Part B: Reporting Principles, Reporting Boundary			
Climate- and Nature-related Information	Part C: A1.1, A1.3, A1.4, A1.5, A1.6, A2.1, A2.2, A2.3, A2.4, A3, A3.1; Part D: Governance, Strategy, Risk Management, Metrics and Targets	Governance – (a) and (b); Strategy – (a), (b) and (c); Risk Management – (a), (b) and (c); Metrics and Targets – (a), (b) and (c)		TC-IM-130a.1, TC-IM-130a.2
Workforce-related Information	Part C: B1.1, B1.2, B2.1, B2.2, B3.1, B3.2			TC-IM-330a.3
List of Security Certifications				
Assurance and Verification				
Reporting Frameworks and Content Indices				

1. "KPI A2.5 Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced", "KPI B6.1 Percentage of total products sold or shipped subject to recalls for safety and health reasons" and "KPI B6.4 Description of quality assurance process and recall procedures", are not materially relevant to our business and the indicators are not applicable.