

Advanced Governance

China Mobile continues to advance the improvement and refinement of modern corporate systems, striving to establish a governance mechanism characterized by legally defined and transparent rights & responsibilities, coordinated operations and effective checks and balances. Throughout the governance process, the Company strictly fulfills its information disclosure responsibilities, maintains open communication with stakeholders and actively integrates sustainability principles into its operations. By driving reforms to greater depths, improving risk management and compliance systems, China Mobile lays a solid foundation and providing robust safeguards for its sustainability.



Optimizing the Corporate Governance System



Preventing and Resolving Various Risks



Optimizing the Corporate Governance System

Standardizing Corporate Governance

※ Safeguarding Investor Rights

Standardizing Information Disclosure

The Company's information disclosure practices are led and managed by the Board of Directors, with the management team fulfilling relevant responsibilities. Since 2003, the Company has implemented internal control systems and procedures for information disclosure and established an Information Disclosure Committee. The committee includes the Chairman, Chief Executive Officer, Chief Financial Officer and heads of major functional departments. The Board of Directors authorizes the Information Disclosure Committee to oversee the organization and coordination of daily external information disclosure, ensuring timely, lawful, accurate and complete disclosure. This ensures excellent corporate governance and transparency, enabling prompt and appropriate responses to inquiries from investors, securities analysts and the media, thereby preventing stock price fluctuations caused by market misinformation.

To meet the regulatory requirements for the issuance of RMB-denominated share, the Board of Directors reviewed and approved the *Administrative Measures for Information Disclosure* and the *Administrative Measures for Raised Funds*, which took effect on January 5, 2022. Any department or individual violating the information disclosure procedures and internal control systems, resulting in disclosure errors or breaches of relevant laws and regulations, will be held accountable as appropriate.

In compliance with the provisions of the *Securities and Futures Ordinance* (Chapter 571 of the Laws of Hong Kong), the *Securities Law of China*, *Administrative Measures for Information Disclosure of Listed Companies* from the CSRC and other requirements, we formulated the *China Mobile Limited Insider Information Knowledge Person Registration Management Measures*, setting up rules and black-out periods on directors, management and employees in dealing with the shares of the Company or exercising share options while they are in possession of inside information. Those who may come into possession of inside information in performing their duties are required to sign an undertaking on their duty of confidentiality and prohibition against insider dealing. Unauthorized use of confidential or inside information for profits is strictly prohibited to prevent violation of laws, regulations and internal disciplines.

Strengthening Investor Communication

The Company maintains active engagement with shareholders, investors and other capital market participants through various channels, including investment bank conferences, one-on-one meetings and teleconferences. This ensures that shareholders and investors are fully informed about the Company's operations and development, while safeguarding their rights to participate in meetings. In 2024, the Company actively addressed the ESG concerns of investment banks and investors, covering areas such as governance structure, carbon neutrality goals and renewable energy usage.

Key investor activities in 2024:

Conference communication: Organized the 2023 Annual Results Briefing, 2024 Interim Results Briefing, the Annual General Meeting and others, facilitating communication between company management, analysts, the media and shareholders.

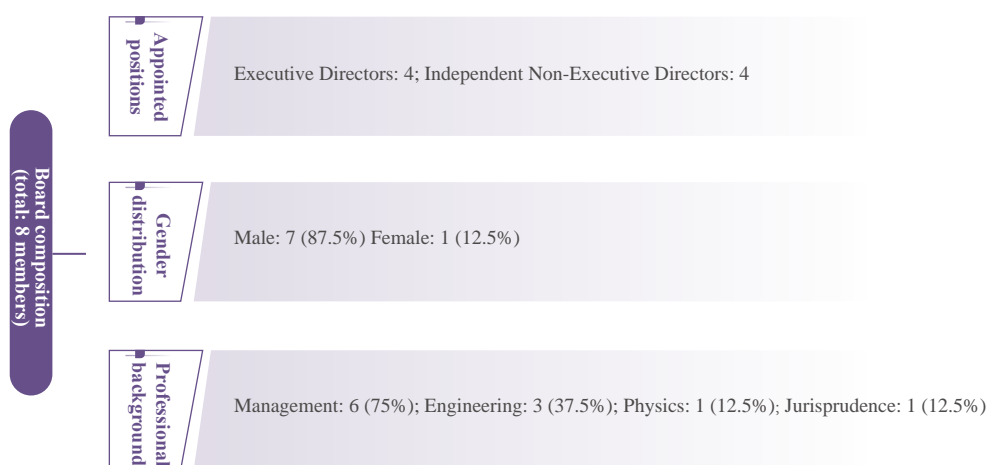
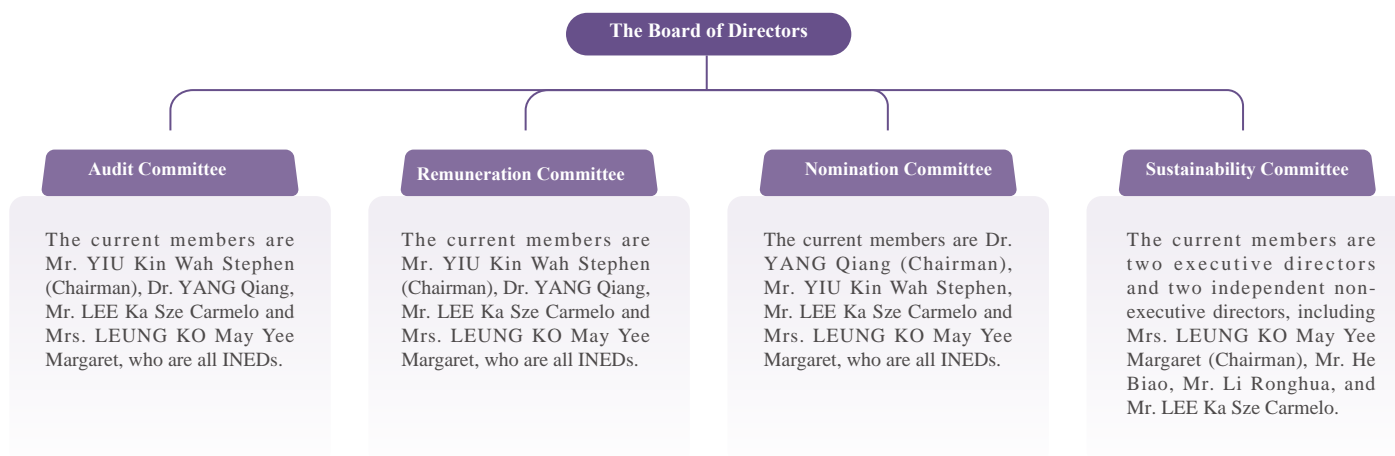
Overseas expansion: Conducted investor communication activities in Europe and the Middle East, including a roadshow in France led by Executive Director and CFO Li Ronghua, and sent representative to participate in an investment bank conference in the Middle East.

Daily interaction: Held regular investor meetings to share the Company's transformation journey, address questions and build trust. In 2024, the Company participated in 46 investor meetings and conducted approximately 297 investor engagement events, covering 1,292 investment institutions and over 2,266 investors.

✧ Strengthening Board of Directors Development

Board Structure

The Company continues to refine its governance system, which includes the *Articles of Association of China Mobile Limited* and other related governance documents. The key responsibilities of the Board include formulating the Group’s overall strategies and objectives, setting management targets, overseeing internal controls and financial management and evaluating the performance of our management, while day-to-day operations and management are delegated by the Board to the management of the Company.



Board Oversight

The Board of Directors supervises the performance of senior management through various methods, including participation in key meetings, establishing resolution tracking mechanisms, and authorizing management supervision mechanism. In 2024, the Board held ten meetings, focusing on financial management, general meeting affairs, risk assessment and internal audit matters. The Audit Committee held seven meetings to review the annual financial report, internal control evaluations and risk management issues. The Remuneration Committee held three meetings to discuss executive compensation and the director’s emoluments for new members of the Sustainability Committee. The Nomination Committee held two meetings to review proposals for director appointments. The Sustainability Committee held one meeting to review the sustainability report and corporate governance-related matters.

In 2024:

Held **10** board meetings; reviewed **56** proposalsHeld **13** specialized committee meetings; reviewed **54** proposalsAll directors actively fulfilled their duties, achieving an average attendance rate of **98.8%** at board meetings

Board Development

The Company places great emphasis on enhancing the capabilities of its Board members. New directors receive comprehensive training on the dual-listing regulations of Hong Kong SAR and the Chinese Mainland, director responsibilities and the standardized operations of listed companies. All directors are regularly updated on regulatory rules, key enforcement priorities and relevant case studies. Additionally, training materials on market value management are provided to ensure directors are well-equipped to fulfill their roles effectively. The Company is also committed to fostering independence, professionalism and diversity within the Board. A director nomination policy has been adopted to evaluate and recommend suitable candidates based on multiple criteria, ensuring the Company's long-term sustainability.

Board independence

The Company strictly complies with the requirements for appointing independent directors stipulated in the Hong Kong Listing Rules and ensures the independence of the board of directors in accordance with the guidelines on independence set forth in the Hong Kong Listing Rules. As of the end of 2024, the board of directors has four independent non-executive directors, accounting for more than one third of the total number.

Board professionalism

The members of the board of directors possess professional qualifications and/or expertise in accounting, finance and risk management, AI and scientific research, law and regulation, finance and economics and other fields.

Board diversity

The Company adheres to and adopts a policy of diversity for board members. When selecting directors, it considers diversification factors based on the Company's business model and specific circumstances, including professional experience and qualifications, regional and industry experience, educational and cultural background, skills, industry knowledge and reputation, awareness of the laws and regulations applicable to the Company, gender, race, language skills and service tenure. As of the end of 2024, there is one female director on the board of directors.

Subsidiary Board Development

The Company actively implements the requirements of state-owned enterprise reform deployment, continuously deepens the standardized construction of subsidiary boards, and constantly improves the modernization level of corporate governance. Specific measures include:

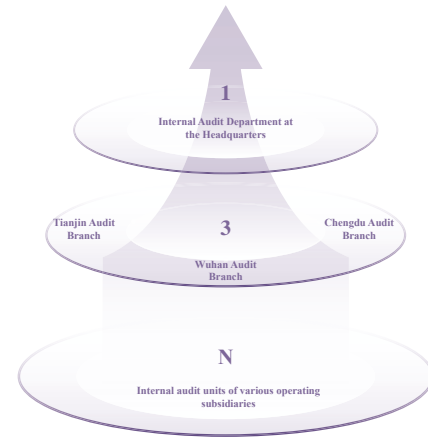
- **Strengthening top-level design for subsidiary boards.** Formulating and revising relevant management measures, optimizing authorization mechanisms and solidifying the top-level design and governance foundation of subsidiary boards.
- **Enhancing guidance on the operation and management of subsidiary boards.** Optimizing meeting management, ledger management and communication processes, improving assessment and evaluation mechanisms, conducting multi-dimensional evaluations and providing feedback on evaluation results.
- **Ensuring external directors' performance support.** Strengthening pre-appointment training for new external directors, compiling and distributing external director manuals and supporting external directors in accelerating their role transition.

✧ Enhancing Audit Supervision

Internal Audit Governance System

In accordance with national audit laws and capital market requirements, the Company refines a three-level internal audit system of management systems, work standards and practical guides under the *Internal Audit Charter*. In 2024, the Company developed and revised four management methods, including the *Measures for the Administration of Economic Responsibility Audit*, issued three work standards and compiled one audit practice guide.

The Company strengthens the Board of Directors' direct leadership over internal audit and refines the "1+3+N" audit working system, which includes the headquarters' internal audit department, three audit branches and internal audit units within subsidiaries. Additionally, the Company has established a professional audit team of over 1,000 members with expertise in auditing, finance, economics, telecommunications and IT. Through a robust training system, the Company continuously enhances the team's professional capabilities.



China Mobile "1+3+N" audit framework

Further Enhancement of Audit Value

The Company's internal audit covers multiple areas, including finance, internal controls, economic responsibility, construction projects and information systems. Through systematic and standardized audit procedures, the Company evaluates the effectiveness of business activities, internal controls and risk management, while providing improvement recommendations. In 2024, the Company systematically assessed risks, centralized resource allocation and innovated audit organizational models. By implementing unified control over seven aspects, including project implementation plans, quality standards and report issuance, China Mobile created a comprehensive "risk prevention and control network". The audit focused on key areas such as technological innovation and computing infrastructure, conducting special audits to uncover potential risks. It also strengthened regular and rotational audits for high-frequency issues in network security and customer rights protection. Additionally, the Company established three types of rectification supervision models i.e. "remote full-scale acceptance, on-site key follow-up and in-depth rectification evaluation".

Breakthroughs in AI+Audit Innovation

The Company kept pace with the new trends in AI+ technology development and formulated an AI + Audit strategy to build AI audit capabilities that combine general and specialized expertise. We actively organized thematic events such as the AI + Audit Innovation and Efficiency Competition and facilitated certifications for digital talents in areas like cybersecurity.

- Based on the infrastructure of the Company's *Jiutian* AI platform, we built an audit-specific large model, expanded audit digital employees, upgraded audit production methods and provided internal intellectual support.
- We constructed a general and specialized combined operational structure, extending application scenarios through the AI+Audit Navigation, launching over 10,000 large models and digital employees, with AI covering more than 50% of audit work processes.
- We have developed competitive audit products of China Mobile, including XR visualization audit and contract AI agents, established a "modular" product service system, promoted capability productization and accumulated over ten items of intellectual property such as patents and trademarks.

2024 Honors

At the 2024 Case Showcase Event organized by the China Institute of Internal Audit, several audit practices of the Company were recognized as Typical Cases of High-Quality Audit Outcomes Promoting Organizational Governance Improvement

In the 2024 Pioneering Case Collection for Internal Audit Digitalization hosted by the China Academy of Information and Communications Technology, the Company's AI + Audit initiative was selected as a Benchmark Case in Frontier Technology Applications

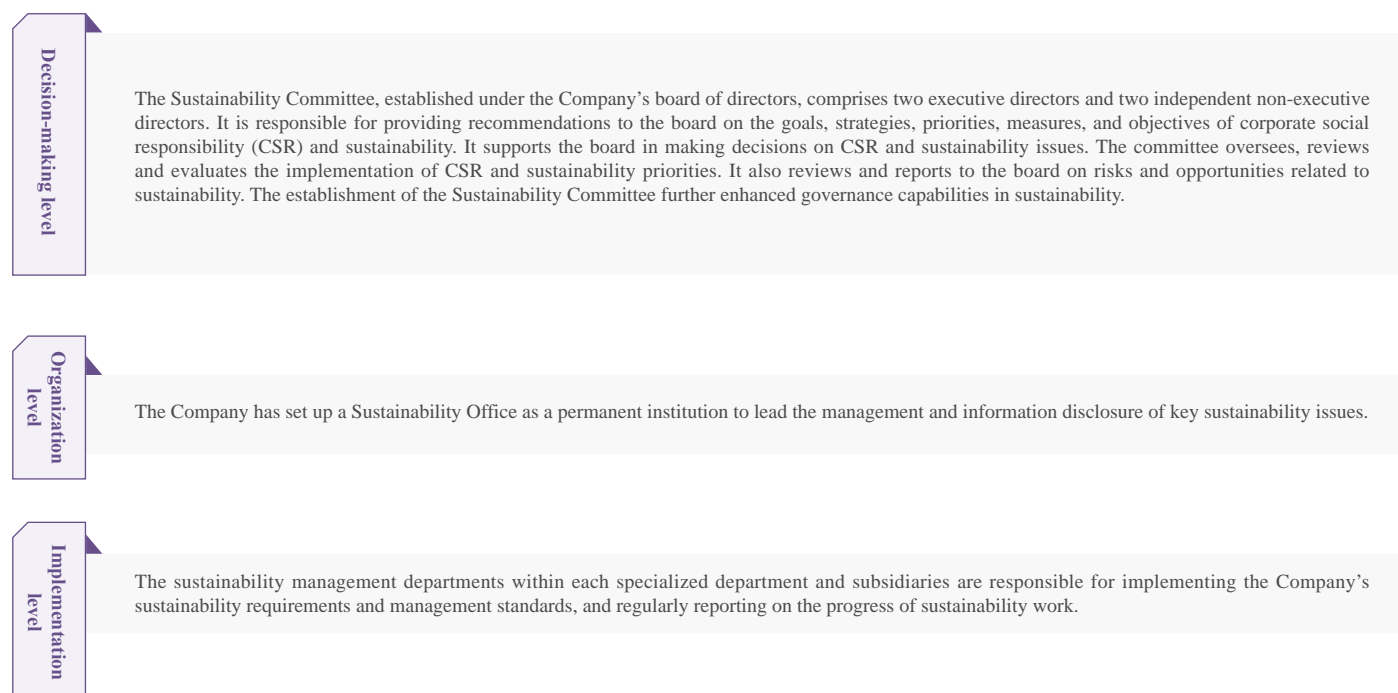
The Company's intelligent audit products were showcased at the 7th Digital China Summit and related industry forums, receiving headline coverage in the China Audit Journal

Sustainability Governance

※ Enhancing the Sustainability Governance Framework

The Company has established a Sustainability Steering Committee, creating a three-tier sustainability management framework featured by deep involvement of senior leadership, horizontal coordination and vertical integration. This framework operates at the levels of decision-making, organization and implementation. The Steering Committee oversees strategic decisions, the office manages organizational activities, and specialized departments and subsidiaries execute specific tasks. With clearly defined responsibilities and distinct roles, the Company efficiently implements sustainability work.

China Mobile's sustainability management structure

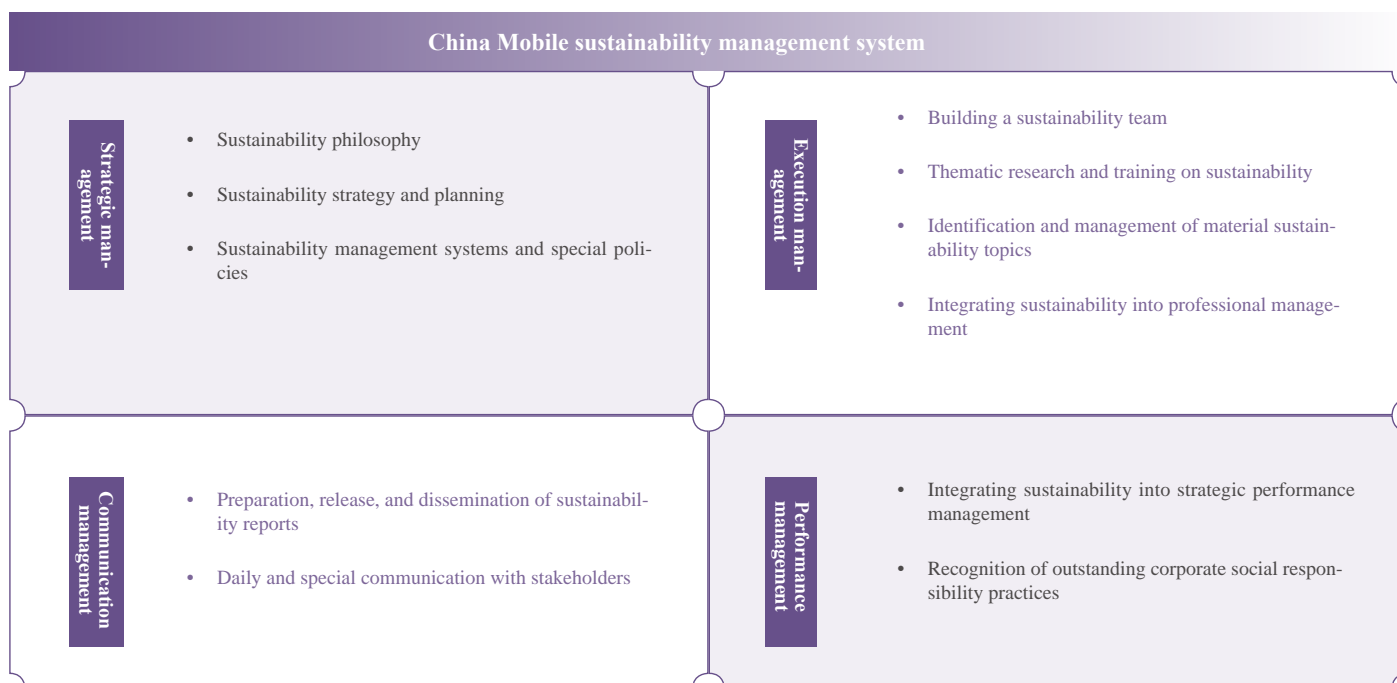


※ Optimizing Sustainability Management System

The Company has established and improved a series of sustainability policy systems, internal control systems and management mechanisms and processes, forming a strategic closed-loop sustainability management system encompassing four modules: strategy, execution, performance and communication. Through regular preparation and release of sustainability reports, the Company has built a long-term mechanism for the continuous advancement of sustainability, covering all employees and processes.

Since 2008, the Company has continuously conducted an annual selection activity for outstanding social responsibility practices. Over 17 years, a total of 1,333 practical achievements from various units have been collected, and 284 excellent practices in different categories have been selected. The 2024 selection activity started in August and ended in December. It resulted in the selection of 10 "Annual Outstanding Social Responsibility Practice Awards", 15 "Annual Excellent Social Responsibility Practice Awards", 5 "Social Responsibility Stars" and 5 "Evergreen Social Responsibility Practice Awards", effectively guiding the Company's units to actively participate in social responsibility practices.





The Company integrates key ESG indicators into the performance evaluation and management of company leaders and subsidiaries, enhancing the sustainability oversight mechanism to promote coordinated development across economic, environmental and social dimensions.

- ▶ **Environmental protection and energy conservation:** The Energy Conservation and Environmental Protection indicator is established to reinforce the concept of green development;
- ▶ **Cybersecurity, information security and privacy protection:** The Network and Information Security Management indicator is set to promote the improvement of the information security management system;
- ▶ **Network quality assurance:** The Major Network or System Failures indicator is introduced to enhance network O&M capabilities and user experience;
- ▶ **Customer rights protection:** Indicators such as Major Complaint Management and Unauthorized Customization are established to strengthen the customer-centric service philosophy;
- ▶ **Business ethics and anti-corruption:** Indicators like Employee Legal Compliance and Major Issues Identified by Internal Audits or Inadequate Audit Rectifications are set to foster a culture of integrity and uphold the Company’s social image.

✧ Stakeholder Engagement

The Company considers addressing stakeholder concerns as the starting point for practicing sustainable development. Guided by the principles of strategic, comprehensive, systematic and participatory sustainability management, we have identified six major stakeholder groups that may or have already significantly impacted its business and operations. Additionally, during the preparation of the sustainability report, we proactively collect issues of concern to stakeholders and integrate them into its decision-making and policy formulation processes.

Stakeholders	Expectations and appeals (top five items) ¹¹	Communication and response channels
Customers	<ul style="list-style-type: none"> Data security and customer privacy protection Network quality assurance Product and service safety and quality Anti-bribery and anti-corruption Social contribution 	<ul style="list-style-type: none"> Customer reception day Customer satisfaction survey 10086 hotline Mobile application App New media such as Weibo and WeChat CEO mailbox Online and mobile service hall
Employees	<ul style="list-style-type: none"> Employee growth and development Protection of employee rights and interests Employee care and well-being Data security, and customer privacy protection Network quality assurance 	<ul style="list-style-type: none"> Employee congress Employee evaluation mechanism Regular training Employee complaint mechanism Performance communication mechanism CEO mailbox and union chairman mailbox
Shareholders and investors	<ul style="list-style-type: none"> Promoting regional coordinated development Empowering social green transformation Rural revitalization Anti-unfair competition Building new information infrastructure and information service systems 	<ul style="list-style-type: none"> Annual reports, interim reports and announcements Results briefing Roadshow and reverse roadshow The general meeting Investor meeting
Value chain partner	<ul style="list-style-type: none"> Data security, and customer privacy protection Network quality assurance Product and service safety and quality Supply chain security Equal treatment of small and medium enterprises (SMEs) 	<ul style="list-style-type: none"> Procurement activities Supplier portal, supplier service station, supplier hotline Training and evaluation CEO mailbox Forums and conferences
Government and regulatory agencies	<ul style="list-style-type: none"> Data security and customer privacy protection Network quality assurance Product and service safety and quality Technological innovation Building new information infrastructure and information service systems 	<ul style="list-style-type: none"> Daily report communication Thematic research site Meeting Related forum communication activities
Media, industry organizations, research institutions, non-profit organizations and other stakeholders	<ul style="list-style-type: none"> Data security and customer privacy protection Network quality assurance Product and service safety and quality Social contribution Technology for disaster prevention and relief 	<ul style="list-style-type: none"> Community activities Weibo, WeChat, and other new media Public welfare project platform CEO mailbox Mass media

¹¹The top five issues reflecting the expectations and demands of various stakeholders are derived from the findings of the 2024 special survey on key sustainability topics. For details on the survey, please refer to page 10.

Comprehensive Deepening of Reforms

The Company fully implements the major decisions and policies outlined at the Third Plenary Session of the 20th Central Committee of the Communist Party of China regarding SOE reform and the information and communications industry. Focusing on the fundamental task of high-quality development, the Company aligns the efforts with both current development and future planning. It accelerates the cultivation and development of new forms of productive forces, establishes new production relationships, and has developed the Implementation of Further Comprehensively Deepening Reform of China Mobile which includes 6 chapters, 20 subsections, and 80 reform measures, designed to holistically advance functional and institutional reforms. China Mobile addresses critical challenges in high-quality development, technological innovation, and institutional mechanisms, aiming to further unleash the Company’s internal drive, innovative vitality, and growth potential.

Advancing institutional reforms for high-quality development

- Establishing a scientific and efficient product innovation mechanism: Develop a multi-dimensional and quantifiable evaluation system to promote full lifecycle product management, strengthen the product manager accountability system and enhance product competitiveness.
- Improving the mechanism for international business development: Strengthen the coordination of domestic and international markets, strategies and resources to improve global operational capabilities and rapidly expand international business.
- Creating a dedicated task force for integrated air-space-ground initiatives: Coordinate efforts in low-altitude economy, aviation internet and integrated air-space-ground network capabilities to advance 5G-ATG deployment and the development of independent satellite service capabilities.
- Promoting organizational transformation in the AI field: Advancing the integration of AI research and development with operations and enhancing the level of basic research and technological innovation.

Advancing institutional reforms for technological innovation

- Deepening the implementation of the Chief Engineer System: Apply the CTO system across interdisciplinary technology initiatives to cultivate outstanding talents.
- Implementing the “flywheel mechanism” supported by joint provincial-specialized investment: Further implement the ‘Trial Action’ through provincial-specialized joint efforts and encourage provincial branches to participate in new capability development, optimize resource allocation and incentives, and create a positive feedback loop.
- Innovating research output mechanisms: Strengthen research efforts, accelerate the commercialization of scientific achievements, and foster the growth of leading technology enterprises.
- Strengthening the reform special projects: Further expand and adjust the ‘Science and Technology Reform’ and ‘Double Hundred’ enterprises, dynamically adjusting to form 13 specialized and innovative teams. 1 team was selected as a national ‘Little Giant’ in the specialized and innovative sector, marking China Mobile’s first national-level ‘Little Giant’. 2 teams were selected as ‘Starting Enterprises’ by the SASAC, and 3 teams were awarded provincial-level specialized and innovative qualifications.

Advancing reforms in governance and incentive mechanisms

- Deepening governance mechanism reforms: Implement the requirements of the Company Law, empower the Board of Directors to fulfill its role, and refine evaluation mechanisms.
- Deepening talent management reforms: Optimize the selection and development mechanisms for leadership, promote the principle of “promoting the capable and demoting the mediocre”, and improve talent recruitment and exit mechanisms.
- Deepening incentive mechanism reforms: Establish a scientific compensation system, allocate resources to core talents and technological innovation, and implement specialized incentive programs.

Advancing the reform of the professional integration mechanism.

- Better leverage the overall coordination role of “headquarters managing the overall situation”, fully support the “regional main battlefield” market development, optimize and enhance the “specialized main construction” capability, and integrate “capital operations” into the collaborative operation system.
- Optimize strategic positioning and the evaluation mechanism, concentrate resources on building core products and improve resource utilization efficiency.

Making every effort to advance the deepening and enhancement of the reform actions

- By the end of 2024, the overall completion progress of the 169 reform deepening and enhancement tasks of the Company is 83.4%, surpassing 70% of the target.
- For three consecutive years, the Company has been rated as A-level in the special assessment of central enterprise reforms, ranking fourth among central enterprises in 2023, with several reform experiences being promoted and publicized.

Preventing and Resolving Various Risks

Overall Risk Management

China Mobile has established a well-defined and comprehensive internal control and risk management organizational structure, leveraged the Board of Directors' full-chain internal control and supervision role, and strengthened the management team's execution and promotion, while the "three lines" of business and functional departments, business management & risk management departments and supervisory departments work in coordination. Through full employee participation, the Company promotes comprehensive risk management to ensure sustained, stable and long-term development.

※ Enhancing the Internal Control and Risk Management System

The Company strictly adheres to laws, regulations and regulatory requirements, tailoring the risk control framework to the actual circumstances. We have built a three-tier system of internal control and risk management framework comprising "top-level policies, specialized policies and foundational policies", with a systematic, hierarchical, interconnected and practical framework. This strengthens full process prevention and control and safeguards high-quality development. The *Risk Management and Internal Control Management Measures*, as the top-level risk control policy, defines the principles, objectives, scope and requirements for risk control. Specialized policies such as the *Major Project Special Risk Assessment Management Measures* and the *Major Business Risk Event Reporting Work Management Measures* further clarify institutionalized and process-driven risk control requirements for key tasks and critical areas. In 2024, the Company continued to refine the *Internal Control Manual and Matrix*, as well as professional management policies across various domains. It detailed internal control processes and key control points, standardizing specific management rules and risk prevention requirements in each professional field.

Improving risk control framework

Three Lines collaborative mechanism

The Company has established three lines of defense for risk management, with all internal control points assigned to specific responsible individuals to ensure effective risk control,

- **First-line execution responsibility**, business execution units are responsible for risk control within specific business processes.
- **Second-line risk control responsibility**, the internal control and risk management departments coordinate and organize the development of the risk control system; business management departments strengthen line management, standardize business system design, implement hierarchical risk control, and drive the resolution of various issues.
- **Third-line oversight responsibility**, internal audit and inspection departments fulfill their oversight duties, and conduct inspections and supervision in key areas, with the Group's internal control supervision and evaluation covering all units across the group over a three-year period.

Deep integration of risk control and business

In 2024, the Company continued to strengthen our risk control system, promoting the deep integration of risk control and business operations. Specific measures included:

- **Integrating risk control into corporate governance**, the Board of Directors conducted special reviews of major risk assessments and the development of the internal control system, comprehensively evaluating the effectiveness of risk control and approving annual plans.
- **Integrating risk control into institutional processes**, the Company implemented external regulatory policies, comprehensively reviewed business development control requirements and optimized and revised the *Internal Control Manual and Matrix* based on internal and external supervision findings.
- **Aligning risk control and compliance management**, the Company improved compliance risk identification, assessment and early warning mechanisms, integrating the "three lists" of compliance management with the *Internal Control Manual and Matrix*. This further clarified compliance management control objectives and responsibilities, advancing the integrated management of strong internal controls, risk prevention and compliance promotion.
- **Dynamic optimizing and updating internal control manuals and matrixes**, the Company promoted the embedding of risk control requirements into business processes, positions, systems and regulations, strengthening end-point risk prevention and control capabilities. By the end of 2024, an internal control manual and matrix covering 14 business processes and 483 key control points had been established.

※ Strengthening Major Risk Assessment and Management

The Company analyzed external economic conditions to further refine its risk map, enhancing the accuracy of risk identification. Based on this, we comprehensively conducted the 2024 major risk assessment, following a five-step process of risk collection, aggregation, assessment, measure breakdown, and regular monitoring. This process identified major business risks for 2024. To address these risks, the Company formulated 46 targeted control measures, designed 120 risk quantitative monitoring indicators, and established a risk control ledger. These efforts integrated risk prevention into the priorities of all business lines and reinforced risk prevention responsibilities. The Company also strengthened risk monitoring and early warning, regularly tracking the completion of risk control measures and promptly addressing abnormal situations. As a result, no major operational risk incidents occurred throughout the year.

※ Upgrading Digital and Intelligent Risk Control Measures

In 2024, the Company enhanced its digital and intelligent risk control capabilities to improve risk control and management efficiency. We optimized centralized financial and business systems, unified business and financial processes and standardized control points. By deeply applying technologies such as Natural Language Processing (NLP), Optical Character Recognition (OCR), and Robotic Process Automation (RPA), and leveraging centralized systems and middle-platform capabilities, the Company strengthened centralized risk supervision to enhance risk management and control efficacy.

- **Improving the level of IT solidification of internal controls:** the Company assessed the IT solidification of internal controls across all units, promoting the incorporation of internal control requirements in system planning and integrating them into front-end business systems. Through automated system controls and process solidification, we reinforced the rigid constraints of internal controls, reducing human intervention. By the end of 2024, the IT solidification rate of internal controls increased from 90% to 95%.
- **Promoting the expansion of centralized systems:** jointly led by financial and business departments, our centralized budgeting, cost and asset management systems were expanded to all 31 provincial companies. The centralized supply chain management system has achieved full coverage for domestic units, and the centralized financial system has integrated with over 200 business and financial systems, including those for network, marketing, procurement and engineering. The integration of business and financial system interfaces is realized through unified rules and unified data, strengthening penetration-based management. Digital-intelligent methods are used to deploy control rules at a single point, applicable across the entire network.
- **Expanding centralized digital and intelligent risk supervision capabilities:** the Company established multiple digital models covering key areas such as market operations, government and enterprise services, engineering and “four conducts and eight rules”. These models enabled centralized risk supervision to penetrate customers and suppliers, projects, contracts and orders. A risk disposal monitoring mechanism was also implemented, where the system automatically identifies abnormal risks and promptly assigns tasks to specific responsible individuals, ensuring effective early warning and task resolution.

Adhering to Compliant Operations

China Mobile has always adhered to the compliance philosophy of “abiding by laws, respecting rules, honoring commitments and cultivating moral integrity”, and strictly follows various laws, regulations, and industry regulatory policies and guidelines. The Company continuously enhances its capabilities in legal governance and compliance management, steadfastly becoming a practitioner, leader, and disseminator of lawful and compliant operations. In 2024, the Company had no major violations of laws and regulations.

※ Rigorous Execution of the Compliance Escort Plan

The Company closely integrates compliance management with reform, innovation, and high-quality development. We continuously improve compliance management systems, strengthen compliance management organizations, solidify compliance operational mechanisms, and enhance compliance risk prevention. These efforts ensure compliance management covers the entire business operation and service chain, safeguarding the Company’s stable and long-term development.

Improving the Compliance Management System

The Company ensures the effective implementation of compliance management systems, with all subsidiaries updating and formulating basic compliance management policies to further solidify the foundation of compliance management. We have deepened compliance risk identification, assessment, and early warning mechanisms, strengthened mechanism coordination and integrated the “three lists” of compliance risks with the Internal Control Manual and Matrix, further enhancing business compliance risk control.

Strengthening Compliance Management Reviews

The Company strengthens legal and compliance reviews of regulations, economic contracts, and major decisions, ensuring the effectiveness of compliance management. We conducted legal reviews of the Company’s regulations for legitimacy and compliance, providing legal opinions and improvement suggestions to solidify the foundation of operational management systems. We also enhanced contract review support for emerging key areas such as technological innovation, ensuring business compliance. We accelerated the AI + Contracts initiative, continuously improving capabilities and empowering management, and actively promotes the China Mobile *Xie Zhi* smart contract product to improve industry efficiency. Additionally, we provided legal support for corporate governance, technological innovation, special reforms and key investments, fully supporting the Company’s transformation and upgrading strategy.

Enhancing Compliance Management Capabilities

The Company's management led by example, signing the Compliance Commitment Letter, while over 160,000 new employees and key personnel across the Company also signed compliance commitments, integrating compliance culture into daily operations. Compliance management training has been included in the Company's key training programs, with specialized training for full-time and part-time compliance personnel for many years. Special compliance courses have been added to training programs for mid-to-senior management, enhancing the compliance awareness and capabilities of key personnel.

In 2024:

The Company has released the annual compliance management report for **7** consecutive years



The Company conducted **over a thousand** compliance training and cultural exchanges events



A total of more than **340,000** participants attended compliance-specific training across the Company



※ Advancing the Rule of Law in China Mobile Initiative

China Mobile establishes the "rule of law" culture philosophy of "operating according to the laws and following the rules", perfects the five major rule of law work systems of "leadership responsibility system, legal governance system, regulations system, compliance management system and work organization system" and comprehensively enhances the capabilities in legal corporate governance. We have comprehensively enhanced the five core capabilities of 'leadership and support, risk control, foreign-related assurance, proactive rights protection, and digital management' in line with the principles of legal governance. Furthermore, the Company formulated and implemented the *Pilot Plan for the Implementation of Building a World-Class Rule-of-Law Enterprise*. By leveraging the support of China Mobile Rule of Law Construction Expert Committee, legal research centers in specialized fields, and legal expert databases, we advanced the Company's rule-of-law development and compliance management initiatives.

In terms of cultivating awareness of the rule of law, we have established a long-term mechanism for legal education for leadership and management personnel, holding the National Constitution Day theme activity for eleven consecutive years. Senior executives took the initiative to lead learning sessions, with over 20,000 employees participating, promoting the spirit of the Constitution. To enhance law-based and compliant operations, the Company conducted hierarchical and comprehensive legal education activities on the new Company Law for management, employees, and subsidiaries. We also compiled and distributed the Civil Code Legal Case Collection and regularly and systematically carried out legal education on the Four Laws and One Regulation in the cybersecurity and information domain. Through special lectures, series of seminars, and warning education cases, the Company widely disseminated legal knowledge, strengthening legal awareness across the organization. Additionally, the Company held a series of law popularization activities of Operating According to the Law, Protect Life to promote the concept of rule of law culture deeply rooted in people's mind.

※ Focusing on Anti-Unfair Competition

The Company has actively engaged in building a fair and open market environment and implemented the following three measures to promote high-quality business development:

- **Special campaign against online violation channels:** Conducted special campaigns targeting non-compliant channels on online internet cards and platforms, strengthened the management of online agents and centralized cleanup of fraudulent advertising and non-compliant sales practices.
- **Rectification of keep numbers while switching carriers issues:** Improved number portability service quality and urged provincial branches to enhance industry communication and optimize system functions to address malicious competition in mobile number portability.
- **Promotion of tariff transparency:** Advanced the implementation of tariff filing and public disclosure, completed the integration of the tariff management system with the National Telecommunications Service Comprehensive Management Platform and ensured tariff transparency to safeguard users' right to know.