

*Engage in emergency rescue
and safeguarding development
security*

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Engage in emergency rescue and safeguarding development safety

China Unicom implements the holistic approach to national security, coordinates development and security, focuses on building a full-chain security protection system covering networks, data, applications, and terminals, solidifies the security barriers for digital infrastructure, strengthens the protection of critical information infrastructure, deeply promotes special governance for anti-commercial bribery and anti-corruption, improves and perfects the modern enterprise system, and serves the overall national network security strategy.



Measures adopted in 2025

- The Company provided communication support services for 114 major national events and major event support for 17 “cloud diplomacy” occasions.
- The Company accelerated the promotion of the deep integration of AI and cybersecurity to ensure the safe and stable operation of critical information infrastructure.
- The Company's data security management capabilities reached a leading domestic level, becoming the first enterprise in China to pass the Level 5 evaluation, the highest level of the national Data Security Maturity Model (DSMM).
- The Company invested RMB 2.7 billion in production safety, conducted in-depth investigation and rectification of risks and hazards, and fully implemented the primary responsibility for production safety.



Actions to be taken in 2026

- The Company will improve the communication security mechanism for major events with the highest standards and strictest requirements and complete communication and security assurance services for various national-level major events at a high level.
- The Company will build an integrated security system featuring intelligent synergy and proactive defence and enhance the capability to handle complex cyber threats.
- The Company will improve the full-lifecycle data governance and control framework, strengthen data security governance and personal information compliance protection, and build a solid defence line for user information security.
- The Company will upgrade the production safety hazard inspection and rectification system, conduct risk inspections and emergency drills on a normalised basis, and make every effort to ensure that production safety is stable and controllable.

Courageously undertaking urgent, difficult, dangerous, and heavy tasks

Ensuring communication services for major events

With a high sense of responsibility and excellent capabilities, China Unicom has consistently applied the working attitude of “striving for perfection and ensuring absolute reliability” throughout its operations, going all out to perform communication service assurance tasks for important national meetings, major events, and home-field diplomacy, achieving zero network accidents, zero service complaints, and zero assurance errors.

- The Company improved its contingency planning framework by formulating and issuing documents such as the “China Unicom Guidelines for Communication Support of Important Activities” and the “China Unicom Emergency Plan for Communication Support (2025 Edition)”, adding three specialised contingency plans for broadband, lines, and power, and two special plans for typhoons and rain, snow and freezing weather, and 1,586 emergency drills were organized.

- Continuously promote the modernization of emergency communication support capabilities through the synergy of support mechanisms, the professionalisation of team building, the modernization of equipment and facilities, the systematisation of technological innovation, and the continuous strengthening of network resilience.

- Provided communication security services for major national events 114 times, provided important communication security services for “Cloud Diplomacy” involving central leadership 17 times, and provided communication security services for major national events such as the 2025 National People’s Congress and the Chinese People’s Political Consultative Conference (NPC & CPPCC), the Harbin Asian Winter Games, the 80th Anniversary of the Victory of the War of Resistance, the SCO Tianjin Summit, and the 15th National Games, receiving high recognition from superior units.

Emergency communication support
personnel dispatched reached

302,000
person-times

Dispatched

85,000

emergency communication vehicle-
times

Deployed over

6,000 sets of

emergency communication
equipment

Case Study

On 3 September, the commemoration of the 80th anniversary of the victory of the Chinese People’s War of Resistance Against Japanese Aggression and the World Anti-Fascist War was grandly held at Tiananmen Square in Beijing. China Unicom completed the communication support task for this conference with high standards and high quality, comprehensively upgraded technical means, and introduced advanced technologies such as 5G-A, AI, and 5G+Beidou to meet the three major video transmission requirements of high bandwidth, low latency, and zero jitter, ensuring the timely and stable news transmission of the commemorative conference, and building a dual barrier of strong security and low latency for transmission. A total of 22,500 person-times of support personnel, 5,600 vehicle-times of support vehicles, and 3,300 network management personnel on duty were deployed across the entire network; the network at all levels operated stably, and no major network failures occurred.

Case Study

As an official partner of the 15th National Games, China Unicom exclusively undertook the construction, operation, and maintenance of the “dual-core” systems of the Main Operations Center (MOC) and the Technical Operations Center (TOC). It achieved seven “firsts” for the 15th National Games, including the first-ever implementation of cross-region multi-competition zone system management and collaborative sharing, fully safeguarding the spectacular moments of the 15th National Games.



China Unicom Fully Safeguarded the Splendid Moments of the 15th National Games

Rushing to the front line of emergency rescue and disaster relief

Promote the deep transformation of disaster prevention from “passive response” to “active defence”, and formulate and issue documents such as the “China Unicom Natural Disaster Emergency Communication Support Guidelines”, clarifying the key prevention points, response measures, response procedures, and detailed implementation rules for communication support work in different scenarios.

- Actively participated in the front line of emergency rescue and disaster relief efforts, including the magnitude 6.8 earthquake in Tingri, Shigatse, Tibet; extreme gale weather disasters in North China; rainstorms and floods in Beijing-Tianjin-Hebei; mudslides in Yuzhong, Gansu; and typhoons such as “Wutip”, “Kajiki”, “Ragasa”, and “Matmo”.

- Throughout the year, a cumulative total of 99,000 person-times of disaster relief personnel, 31,000 vehicle-times of emergency rescue vehicles, and 19,000 units/times of emergency equipment and power generators were deployed; a cumulative total of 38,000 base station-times were restored, and 13,000 sheath kilometres of optical cables were repaired, safeguarding the “lifeline” of communications in disaster areas, gaining high recognition from local governments and the public, and fully exerting the “ballast stone” role of central enterprises in the national emergency response system.

Case Study

In April, various locations in the Inner Mongolia Autonomous Region encountered the most severe blizzard disasters in nearly a decade. In the face of the severe disaster, China Unicom Inner Mongolia promptly activated its emergency support contingency plan; the rescue teams braved the extreme cold and headed to the front lines, advancing on foot into the disaster-affected areas amidst the harsh environment of wind and snow. A total of 1,335 person-times of support personnel, 714 vehicle-times of support vehicles, and 156 power generators were deployed, achieving a daily average of 503 communication facility inspections and 11,021 route-kilometres of optical cable inspections, establishing a stable and reliable communication lifeline under extreme disaster weather conditions.



Inner Mongolia Unicom employees carrying out emergency repairs in wind and snow

Case Study

As the main flood season begins, China Unicom has integrated various flood prevention measures and deployed high-tech flood prevention equipment and innovative flood control tools, such as emergency rescue drones, portable satellite backpack stations, and AI flood prevention large models. For instance, branches in Southeast coastal regions such as Fujian, Zhejiang, Jiangsu, and Shanghai fully responded to Typhoon No. 8 “Co-May”; Shandong Unicom utilized satellite communications, emergency communication vehicles, and portable base stations to construct an “air-space-ground” integrated temporary network; and Hebei Unicom equipped 14 sets of high-throughput satellite backpack stations for areas experiencing severe floodings, taking multiple measures and racing against time to engage in flood prevention and disaster relief.



Shandong Unicom constructed an integrated “space-air-ground” temporary network



Jilin Unicom employees carry out emergency repairs in wind and rain

Safeguarding cyberspace security

Data security and customer privacy protection

Governance structure for data security and customer privacy protection

China Unicom strictly complies with laws and regulations such as the Cybersecurity Law of the People's Republic of China, the Data Security Law of the People's Republic of China, the Personal Information Protection Law of the People's Republic of China, and the Regulations on the Protection of the Security of Critical Information Infrastructure, to safeguard social public interests and the legitimate rights and interests of users. Formulated a series of rules and regulations, such as the “China Unicom Network and Information Security Management Measures”, the “China Unicom Data Security Management Measures”, and the “China Unicom Personal Information Protection Management Measures (Trial)”, to standardize the Company's network security, data security, and privacy protection management systems. A cybersecurity leading group has been established with an office thereunder, thereby forming a network and information security management system with clear responsibilities and division of labor, and conducting performance monitoring and measurement of the performance of network and information security responsibilities.

China Unicom Network and Information Security Governance Architecture and Supervisory Responsibilities

Management Structure	Composition of Personnel/Institutions	Main Responsibilities
Cybersecurity Leadership Team	The Chairman shall serve as the group leader, and the General Manager and Deputy General Managers shall serve as the deputy group leaders	☆ Organise the deployment and overall coordination of the company's network and information security work, make decisions on strategies and major matters, and study and deploy network and information security assurance work for major activities as well as major special actions.
Office of the Cybersecurity Leadership Team	Network and Information Security Department	☆ To coordinate the overall work of the company's network and information security, establish network and information security management systems, management policies and procedures, and supervise and inspect the implementation and execution thereof. ☆ Report work progress to the Cybersecurity Leading Group on an irregular basis, and report major network and information security matters in a timely manner.
Implementation and Execution	Each professional department of the Group Company, each provincial branch (subsidiary) company	☆ Implement the requirements for the deployment of network and information security management planning, systems, and action plans, and assume the responsibility for network and information security of the unit; supervise and inspect the execution and implementation of network and information security work of subordinate units..

Industry Analysis and Response Strategies for Data Security and Customer Privacy Protection

Regularly identify risks and opportunities existing in the data security and privacy protection system, and establish a normalised and all-dimensional risk and opportunity identification mechanism. Focus on identifying risks and opportunities in areas such as the data lifecycle management process, the degree of independent controllability of core technologies, and employees' privacy protection awareness and operational standards, so as to grasp the challenges and opportunities brought by information security and privacy protection. The short term of the time horizon is 0-1 year, the medium term is 1-5 years, and the long term is over 5 years.

China Unicom's Technology Innovation Opportunities, Risks and Countermeasures

Opportunities/Risks Category	Sub-category	Risk/Opportunity Description	Time Horizon	Response Measures
Opportunity	AI-driven Intelligent Security Service Opportunities	Security risks of generative artificial intelligence are exhibiting a trend of high frequency and complexity, and the demand for security governance covering the entire life cycle of large models is becoming increasingly urgent.	Medium-term	Relying on the UniAI•Zhidun digital-intelligent security governance platform, we have independently developed a one-stop AI security governance and compliance solution covering the entire lifecycle of large model deployment, training, and application.
	Secure and Inclusive Opportunities for Micro, Small and Medium Enterprises	Small, medium and micro enterprises lack professional IT and security teams, which has given rise to demand for lightweight, easy-to-implement, and low-maintenance-cost security solutions.	Medium-term	Relying on the "Security Hub" cloud marketplace to aggregate ecological resources, helping small and medium-sized enterprises access high-standard security protection at low cost.
Risk	Data breach risks	As a critical information infrastructure operator, its data breach risks require attention to the entire data life cycle, including various stages such as collection, storage, transmission, use, and destruction, as well as factors such as external attacks and internal operations.	Long-term	Continuously strengthen and improve data security technical capabilities, adopt technical measures to strictly limit access permissions to sensitive data, formulate and regularly conduct drills for information security incident emergency response plans, and comprehensively enhance the data security literacy of all personnel.
	Risk of illegal and non-compliant use of customers' personal information	The continuous evolution of tools and means for illegal intrusion into computer information systems has resulted in the risk of theft of citizens' personal information, which may infringe upon the legitimate rights and interests of customers and may further induce risks of illegal and criminal activities such as telecommunications network fraud.	Long-term	Establish a comprehensive customer personal information security governance system. Strictly follow the principles of legality, legitimacy, necessity, and good faith in the collection and use of customers' personal information, establish a department responsible for the protection of customers' personal information, and formulate relevant internal control systems.

Data Security and Customer Privacy Protection Impact, Risk and Opportunity Management

Establish data security risk assessment control procedures, standardise the methods for data security risk assessment, effectively identify, analyse and assess data security risks, provide descriptions for the steps and processes of data security risk assessment, and enhance the level of data security management.

Data Classification and Grading	Comprehensively sort out the data assets involved in the business operations of the Company, establish a data asset inventory, integrate and classify them according to business attributes, and implement hierarchical protection for various types of data.
Data security risk monitoring and early warning	Monitor data security and customer personal information security incidents through methods such as early warning monitoring, third-party monitoring, and notifications from superiors.
Data security risk assessment	With reference to YD/T 3956-2024 “Specifications for Data Security Risk Assessment in the Telecommunications Field”, implement data security risk monitoring and assessment, conduct comprehensive analysis of data processing activities, compliance assessment and security risk analysis, timely investigate potential security hazards, and form assessment conclusions.
Handling of data security risks	Timely rectify data security risks and hidden dangers discovered during the assessment to eliminate or reduce such risks and hidden dangers.
Supervision and Inspection of Data Security Risks	Establish a supervision and inspection mechanism to supervise and inspect the status and implementation effectiveness of data security risk assessment work, and promptly urge the rectification of issues.

Data Security and Customer Privacy Protection Indicators and Targets

Adapt to new technologies, new dynamics, and new situations in the development of the cyberspace sector, enhance network management and governance capabilities through technological and management innovation, deepen cross-disciplinary synergy and cross-regional linkage, and improve the level of cybersecurity.



Strengthen fundamental management of data security

Build a solid security barrier for data security and customer privacy protection; guided by risk prevention and mitigation, driven by security compliance and value release, and based on the management system, technical capability system, and operation system, enhance data security compliance management, technical defense capabilities, and risk early warning capabilities; actively plan the development of an intelligent data security integration system, and continuously establish a benchmark for industry data security governance, with data security management capabilities reaching a leading level in China.

- Strengthen the full life-cycle management of important data and core data, optimise and improve risk assessment mechanisms, continue to perform well in the identification of core data, important data, and general data, and ensure that core data and important data are secure and controllable.
- Strengthen the timely discovery and effective handling of data security risks, construct a national integrated operation system, and establish a data security integrated operation platform covering 31 provinces nationwide plus 10 branches and subsidiaries.
- Taking the lead in establishing group-level data security risk monitoring capabilities, forming an intelligent discovery and effective response mechanism for data security incidents, and achieving global monitoring of data security risks with the three core capabilities of abnormal operation behaviour auditing, API risk monitoring, and data ransomware protection.

The first in China to pass
the evaluation for **Level 5, the highest level** of the national Data Security Maturity Model (DSMM)

Strengthening key technological breakthroughs on data security

- Relying on the Unicom UniAI large model and deeply integrating artificial intelligence technology, the Company has innovatively created an intelligent data security operation system and constructed a “five-in-one” intelligent management system comprising “intelligent identification, intelligent inquiry, intelligent testing, intelligent governance, and intelligent monitoring”. Centering on stages such as dataset construction, data labelling, model training, and model application services, the Company carries out research on artificial intelligence data security technology, gradually achieving a leap from passive defence to active perception, intelligent early warning, and automatic disposal.

- Explored the implementation of AI security service applications, supported the model security construction of the Intelligent Computing Centre in Changchun New Area, Jilin, deeply participated in the construction of the China-ASEAN Trusted Data Zone, and deeply empowered China Unicom's UniAI “1+1+M” large model system, creating pilot application scenarios through the three core paths of “integrating intelligence into security, integrating security into models, and using models to govern models”.

Strictly uphold the principles of customer privacy protection

Strengthen the management of personal information security, formulate institutional norms such as the “China Unicom Administrative Measures for the Protection of Personal Information (Trial)”, protect the rights and interests of personal information, regulate personal information processing activities, and promote the rational utilization of personal information.

- Publicly disclose the “China Unicom User Privacy Policy”, covering various stages such as information collection, use, disclosure, and destruction, to safeguard user information security and the right to know. Strictly comply with relevant national regulations to perform user information security protection work, and utilise necessary security technologies and supporting management systems to prevent user information from being leaked, damaged, or lost.

- Carry out special inspection work on personal information protection for the Company's internal mobile internet applications (App), and establish a long-term regulatory mechanism for App personal information protection to ensure effective protection and lawful utilisation of user privacy data throughout its entire life cycle.

- Conduct specialised training, enhance employees' awareness and skills in protecting users' personal information, and continuously reinforce employees' professional competence in personal information protection to ensure the effective safeguarding of users' personal information.

Building a clean and orderly cyberspace

Forging cybersecurity capabilities

China Unicom deeply integrates emerging technologies such as AI, continuously promotes the construction of fundamental security capabilities in fields including cloud, network, edge, terminal, and data, and takes AI technology as the core engine and digital intelligence innovation as the key starting point to accelerate the deep integration of AI and network security, thereby fortifying the security defence line for national critical information infrastructure.

- Steadily promote the security protection of critical information infrastructure, establish a long-term mechanism for critical information infrastructure security protection, strengthen the management of identification and determination of critical information infrastructure, improve the response mechanism for critical information infrastructure, and ensure the safe and stable operation of critical information infrastructure.

- Established a standardised cybersecurity foundation database, deepened intelligent cybersecurity operation capabilities and security support capabilities, and successfully completed security work for various major activities.

- Building an endogenous security system for artificial intelligence, publishing the “Artificial Intelligence Security Governance White Paper (2025)”, leading multiple international standards and research projects, and forming industry-leading artificial intelligence content security evaluation datasets and capabilities.



Strengthen infrastructure protection and fortify the cybersecurity foundation

Rectify the disorder of harmful information

Continuously rectify the chaos of harmful online information, efficiently intercept harassing information, earnestly maintain a clean cyberspace, protect the legitimate rights and interests of users, and safeguard communication security and user experience.

- Launch the “Two Clearances and Two Reinforcements” special governance action, namely clearing high-risk ports and high-risk vulnerability hazards of important equipment, reinforcing weak account passwords and weak access controls, conducting special inspections on network operation and maintenance access security, and promoting normalised security operations.

- Providing the “Call Do Not Disturb” anti-harassment service, proactively listening to users' registered preferences for rejecting incoming calls and messages, and taking corresponding protective measures based on user preferences, approximately 210 million users have used the protection service, and the cumulative interception volume of the harassment call protection service is approximately 2.1 billion times.

- The “SMS Do Not Disturb” anti-harassment service effectively helps users reject SMS messages from harassing numbers, with approximately 50.25 million registered users and a cumulative total of 85.07 million instances of protection provided.

Strictly prevent telecommunications and network fraud

Strictly complying with the Anti-Telecom and Online Fraud Law of the People's Republic of China, and in response to the continuous escalation in the evolution speed and degree of confrontation of telecom and online fraud methods, China Unicom has evolved towards a new “Digital-Intelligent Anti-Fraud” model, exploring and deploying new AI anti-fraud paths, and promoting the continuous achievement of new results in the work of combating and governing telecom and online fraud crimes, effectively safeguarding the property safety and legitimate rights and interests of the masses.

- Assisted public security authorities in busting over 35,000 criminal dens, representing a cumulative year-on-year increase of 116.6%.
- AI-empowered anti-fraud efforts. Relying on China Unicom's AI Infra (new intelligent computing infrastructure) to construct multiple intelligent computing clusters and develop multiple large vertical models for anti-fraud, covering all business scenarios including monitoring and disposal, early warning and protection, police-telecom synergy, verification and relief, and management and operation. Through the AI outbound call verification large model, which assists in outbound evidence collection and dissuasion work, more than 200,000 potential victims have been automatically called and dissuaded each month since 2025, resolutely protecting the safety of the people's property.
- Conduct anti-fraud education for the general public. Launched a collection of anti-fraud publicity and education works with diverse types, comprehensive nodes, segmented audiences, and balanced internal and external considerations; the anti-fraud public welfare video “Inception” was selected as an outstanding short video in the 3rd Anti-Fraud Short Video Competition by the Ministry of Public Security.



Anti-fraud public service video “Dream-Stealing Space”

Case Study

Ningxia Unicom builds a comprehensive anti-fraud governance system through technological leadership. The Company continued to develop local anti-fraud models, with 8 new local anti-fraud models added, over 60,000 risk numbers detected, and 6,207 high-risk fraud-involved numbers suspended. Government and enterprise businesses such as the Internet of Things (IoT) and privacy numbers all maintained zero involvement in cases. In 2025, the Company was selected as an industry integrity case in the information and communications sector, safeguarding the “money bags” of the masses.



Situational Awareness of Ningxia Unicom's Information Security Governance Platform

Lawful, compliant and honest operations

China Unicom has deeply advanced the fight against corruption, improved and perfected the modern enterprise system, enhanced the risk control and compliance management systems, adhered to the fundamental value of integrity in operations, and established a multi-dimensional support system for sustainable development.

Anti-commercial Bribery and Corruption

China Unicom has profoundly grasped the dialectical unity between “punishment, management, and prevention” and has coordinated the integration and deep fusion of rectifying conduct, enforcing discipline, and anti-corruption with reform and development, system improvement, and governance promotion. The Company continued to refine its anti-corruption systems and mechanisms to steadily consolidate and develop a clean and upright political ecosystem. During the reporting period, the Company complied with the relevant laws and regulations relating to the prevention of bribery, extortion, fraud and money laundering.

Enhancing the overall anti-corruption synergy

Further improved the communication and consultation mechanism between the headquarters of China Unicom and the discipline inspection and supervision group of the Central Commission for Discipline Inspection of the CPC (CCDI) and the National Commission of Supervision of the PRC (NCS) resided in China Unicom, as well as the working mechanism of the anti-corruption coordination group, to build a work framework where each party assumes its own responsibilities with unified coordination, and to promote more synergistic and efficient anti-corruption collaboration and cooperation. During the year, 13 corruption cases were handled, and 8 persons were dismissed and disciplined due to corruption.

Strengthening petition and whistleblowing work

- Continuously improved the level of standardisation, legalisation, and regularisation of petition and whistleblowing work, refined the classification of petition and whistleblowing, standardised the procedures for accepting and handling overseas petitions and whistleblowing, organised and conducted special inspections on the handling of petitions and whistleblowing, further unblocked channels for reporting and accusation, and ensure that public supervision effectively plays its role.

- Implemented rules and regulations such as the “Working Rules for Resident Body of Discipline Inspection and Supervision Agencies”, supervised discipline inspection and supervision personnel to maintain strict confidentiality regarding reported matters, handling status, and information related to whistleblowers, controlled the scope of knowledge and timing of review and investigation matters, and protected the safety of informants, whistleblowers, and their close relatives.

Deepening case-based reform and governance

- Issued the “Opinions on Enhancing the Effectiveness of Case-based Reform and Governance and Integrally Advancing the Improvement of Conduct, Discipline, and Anti-Corruption”, strengthening the full-cycle closed-loop management of individual case analysis, rectification of cases in professional fields, supervision and implementation, and assessment and evaluation. It achieved a transformation from “point-based” rectification by the units where cases occurred to “area-based” rectification in relevant professional fields, further combining the resolution of prominent problems with enhancement of governance capabilities, and continuously increasing the comprehensive effectiveness of promoting case-based reform and governance.

Anti-commercial bribery
and anti-corruption training
coverage for directors and
employees reached

100%

Regularising discipline education

- Established the “Exposure Platform” column on the China Unicom Discipline Inspection and Supervision website, and established a regularised mechanism for the public reporting and exposure of disciplinary cases using real names, to further leverage the role of local cases and local matters in educating and alerting local personnel.
- Widely solicited original integrity education short-videos and organised exhibitions and broadcasts through online + offline methods to enhance the pertinence and appeal of education, guiding the broad range of management personnel and employees to continuously strengthen their awareness of integrity and resistance to corruption.

Anti-corruption education and
training received by

4.129 million
person-times during the year

Establishing an internal control management system

China Unicom anchors its internal control objectives on “strengthening internal control, preventing risks, and promoting compliance”, continuously advances the construction of its internal control system, improves corporate governance, and persists in the integrated promotion of institutional improvement, process optimisation, and supervisory synergy. It continuously enhances internal control management mechanisms and improves the level of risk prevention and control and compliance management, building a solid guarantee for high-quality and sustainable development.

Efficient operation of internal control mechanisms

Strengthen the implementation of the primary responsibility for operational decision-making, establish and improve an internal control work mechanism characterised by strong leadership, clear responsibilities, transparent processes, and standardised order, promote the enhancement of operational management levels, and safeguard the high-quality development of the enterprise.

- The Board regularly listens to reports on internal control, risk and audit work, and considers the annual internal control, risk and audit work reports.
- The audit committee of the Board hears reports on internal control and risk management work on a quarterly basis and guides the implementation of major risk prevention and control work.
- The Chairman shall fulfil the primary responsibility for implementing internal control, oversee internal control, risk and audit work, approve audit reports one by one, regularly listen to reports on key issues identified in audits, and promote the rectification of issues identified in audits.
- The internal control department of the headquarters shall fully exert its leading role to coordinate, organise, promote, supervise and implement the requirements for internal control work.
- The business departments have continuously strengthened the control of professional lines and promoted the top-down transmission of internal control construction responsibilities at every level, achieving the integration of internal control into the entire process of production and operation, covering all employees across all production units.

Continuous strengthening of internal control supervision and evaluation

Continuously optimise the development of the mechanism and system for look-through supervision and evaluation; focus on the development and implementation of systems for key business processes and critical links; integrate the requirements of entity-level penetration, business-process penetration, and data penetration; conduct in-depth analysis and comprehensive investigation of internal control deficiencies; and promote the continuous and effective operation of internal controls.

- Adhering to the principle of full audit coverage and combining the “special internal control audit + economic responsibility audit” model, supervisory inspections are carried out annually on 31 provincial-level branches and key subsidiaries nationwide to strengthen the penetrating supervision of business conduct, capital flows, major risks, and liability for non-compliance.
- Deeply carry out internal control self-evaluation work, achieve full coverage of subsidiaries at all levels within the scope of consolidation for the current year, and strictly control the quality of internal control self-evaluation work. Special internal control self-assessments in high-risk areas are conducted semi-annually; meanwhile, in accordance with the self-regulatory requirements of the Shanghai Stock Exchange, compliance inspections on major internal control matters such as connected transactions and external investments are conducted semi-annually, and no material violations of laws and regulations or internal control defects have been identified.
- Strengthen the overall coordination and dispatching of audit resources and project organisation, and strictly implement quality control throughout the entire process of audit projects; deepen the digital and intelligent transformation of auditing, solidly promote the construction of audit informatization, conduct in-depth research-based auditing, and continuously enhance the breadth, depth, and precision of audit analysis and monitoring, so as to effectively empower auditors in the performance of their duties.
- Focusing on the “second half of the article” regarding audit rectification, the Company vigorously promoted the transformation and application of audit results. In response to emerging and pervasive issues as well as weak links in internal control during business development, the Company issued audit recommendations and warning notices in a timely manner, continuously tracked and urged the implementation of rectification responsibilities, increased the intensity of supervision, inspection, and assessment of rectification work, and strengthened the closed-loop management of the internal control system.

Agile optimisation of the rules and regulations system

- Further optimize the functions of the institutional management system and conduct regular institutional evaluations; in 2025, branches and subsidiaries at all levels across the Group cumulatively formulated or revised more than 5,400 rules and regulations.
- Regularly organize the implementation of updates and optimizations of internal control specifications, and timely update and optimize the basis of systems, risk descriptions, control measures and other contents.

Case Study

China Unicom has innovatively constructed the Smart Audit Platform 2.0, which automatically adapts to business scenarios to conduct risk rating and real-time early warning. Since its launch, it has issued more than 10,000 risk alerts and identified nearly 3,000 risk items, effectively reducing operational risks and assisting the enterprise in achieving compliant and steady operations.

Strictly implement risk management

China Unicom has strengthened centralised and unified management and control, deepened risk prevention and control mechanisms characterised by business penetration, responsibility penetration, and supervision penetration, and promoted the implementation and effectiveness of major risk prevention and control measures, firmly upholding the bottom line of preventing the occurrence of major risks, and safeguarding the high-quality development of the Company with high-level security. On the basis of the issued “China Unicom Risk Management Measures” and relevant professional line risk management systems, the Company has formulated detailed rules for professional line litigation risk control and management norms such as customer data security and employee account security. In 2025, the Company had no significant operational risk incidents.

Strengthen risk identification and early warning

- Conduct risk identification in depth. Using the “China Unicom Risk Catalogue” as a tool, the Company continuously monitors changes in the international and domestic macroeconomic situation as well as the evolution trends of industry development, improves the comprehensiveness and operability of risk identification, and maintains continuous dynamic rolling updates and optimisation.
- Strengthen management and control of the entire process of major risks. Adhere to the principle of ensuring that all major risks requiring assessment are assessed, with full coverage, conduct annual major risk assessment work across the entire Group, scientifically analyse and judge the major risks faced by the Company, establish a responsibility ledger, and consolidate the responsibilities for major risk prevention and control. Strengthen the synergy and linkage between risk departments and business departments, increase the intensity of control over professional lines, deploy and advance major risk prevention and control simultaneously with key tasks of professional lines, and strive to build a risk prevention and control responsibility system characterised by full participation, comprehensive coverage, clear powers and responsibilities, and efficient synergy.

Strengthen risk tracking, prevention and control

Continuously carry out tracking and analysis of major risk situations, convene monthly business analysis meetings, analyse production and operation trends and changes in the impact of major risks, clarify key work requirements such as cybersecurity and information security, business development, and reduction of arrears, and provide continuous supervision. Track and monitor the trends of major risk monitoring indicators on a quarterly basis, summarise the implementation of prevention and control measures and the effectiveness of management and control, and adjust prevention and control measures in a targeted manner to ensure the effectiveness of prevention and control.

Regular risk disclosure

Publicly disclose material risks that the company may face on a regular basis in accordance with capital market regulations; announce the basic circumstances, extent of impact, and disposal and response measures of material unforeseen risk events in a timely manner; and periodically submit materials such as financial final accounts statements, monthly financial express reports, and internal control evaluation reports to superior authorities including the State-owned Assets Supervision and Administration Commission of the State Council and the National Audit Office, and accept supervision and inspection by superior authorities. At the same time, an accounting firm is engaged annually to audit the company's financial reports and the effectiveness of its internal control, which, combined with the company's internally conducted periodic internal control self-evaluation and internal audit supervision, forms a synergy of internal and external supervision to ensure the reasonable design and effective implementation of the company's internal control and to ensure the quality of performance disclosure information.

Strengthening the Construction of Rule of Law and Compliance

China Unicom has deeply implemented Xi Jinping Thought on the Rule of Law, fully executed the State-owned Assets Supervision and Administration Commission of the State Council's deployment for the construction of central enterprises under the rule of law, and anchored the goal of building a world-class enterprise under the rule of law. It has improved the five systems for governing the enterprise according to law and enhanced the five capabilities for compliance assurance. China Unicom's law-based governance has reached a new level, providing a strong guarantee for high-quality development.

• Improve corporate governance by law	The management of the Company regularly studies laws, focusing on the spirit of the Work Conference on Comprehensive Law-based Governance and the Private Economy Promotion Law, etc., and researches and deliberates on key tasks regarding the rule of law; the Board of Directors hears the annual report on the rule of law and compliance; and the principal person-in-charge performs the duties as the person primarily responsible for the construction of the rule of law, promoting the deployment and implementation of the rule of law in tandem with central tasks. Amend the administrative measures for rules and regulations, improve the system framework and management closed-loop, achieve intelligent consultation and precise publicity and implementation, promote the institutionalization of management, the proceduralisation of systems, and the digital intelligence of processes, so as to consolidate the foundation of the rule of law through system construction.
• Strengthen efficient compliance	Improve the compliance management system, strengthen the working mechanism of the Compliance Committee, and promote the synergy of the three lines of defense comprising business, law, and supervision; issue compliance systems such as the “Administrative Measures for Regulating Telecommunications Market Competition”, the “Guidelines for the Prevention of Legal and Compliance Risks in Personal Information Protection for Government and Enterprise Businesses”, and the “Administrative Measures for the Performance of Duties by Compliance Officers”; carry out special rectifications focusing on high-risk areas such as marketing, anti-telecom fraud, anti-monopoly, and cyber and information security, issue early warning prompts focusing on high-incidence and common risk issues, and ensure source-based risk prevention. Dynamically update the compliance manual and the “four lists” to strengthen full-process compliance operations.
• Protection of intellectual property rights	Strengthen the synergistic protection of patents, copyrights, and trade secrets in technological innovation; focus on the “China Unicom” brand to carry out trademark registration and maintenance. Successfully registered 155 material trademarks and 1,406 software copyrights, facilitating brand building and technological innovation.
• Cultivate a culture of the rule of law	Deeply implement the “Eighth Five-Year Plan” for the popularization of law, and create a multi-dimensional publicity and education matrix of “online zones + offline activities” to centrally publicize Xi Jinping Thought on the Rule of Law, disseminate the concept of the rule of law, and strengthen compliance empowerment; aggregate the compliance publicity and education resources of the entire Group, and publish more than 13,000 law popularization articles and videos to enhance the effectiveness of precise law popularization; and produce AI compliance warning videos to be included as mandatory learning content for grassroots activities, creating a strong atmosphere of respecting the law and observing regulations.

Legal review rate of economic contracts

100%

The number of persons studying law on the smart rule of law platform

exceeded 250,000

The number of views for legal popularisation articles and videos

exceeded 120 million

Adhere to the principle of integrity in operations

China Unicom has firmly established the principle of operating with integrity and strictly complies with requirements such as the Advertising Law and the Anti-Unfair Competition Law. By implementing measures including improving the institutional system, strengthening risk prevention and control, deepening supervision and inspection, reinforcing professional supervision, standardizing tariff management, and implementing anti-fraud controls, the Company earnestly protects the legitimate rights and interests of consumers and maintains the order of fair competition. During the reporting period, no incidents of unfair competition leading to litigation or material administrative penalties occurred.

- Improve the system of rules and regulations to consolidate the foundation of honest operation. Continuously improving management systems and business processes, the Company revised and issued the “China Unicom Mobile Resale Business Management Specifications” and the “China Unicom Social Channel Management Measures”, and comprehensively revised the marketing and network and information security volumes of the “China Unicom Professional Line Compliance Manual”, clarifying key control measures for compliant operations.

- Regulate the management of tariff schemes and protect users’ right to be informed of their consumption. Establish a dedicated tariff disclosure section on the online service hall and APP to centrally disclose all tariff plans currently on sale for public users, ensuring information is open and transparent; tariff plans that have not been filed and disclosed shall not be launched for sale. At the same time, the Group proactively reviewed and optimized its tariff schemes, streamlined the content of tariff schemes, and enhanced users’ consumption perception.

- To implement national requirements regarding real-name management and control and anti-fraud, the Company has continuously strengthened the “red and yellow card” network access management and control mechanism to prevent risks such as overseas fraud and non-compliant registration of internet accounts, and constructed a normalized audit and monitoring system. Currently, the headquarters has established 24 real-name fraud-related risk audit models and issued a cumulative total of 2.39 million suspected risk users, building a solid anti-fraud protection barrier through technological means.

- Strengthen compliance risk identification and disposal. Organize and implement anti-monopoly risk inspections, and in conjunction with feedback on issues from inspections and audits, carry out compliance risk inspections targeting key areas such as broadband business, campus markets, business outlets, and social channels. Give full play to the vertical supervisory role of professional lines, and strictly adhere to the compliance bottom line of marketing activities and customer services.

Improving Quality Management Systems

China Unicom has deeply implemented the strategy of strengthening the country through quality, fulfilled the requirements of the State-owned Assets Supervision and Administration Commission of the State Council regarding the quality improvement work of central enterprises, continuously strengthened the “baseline, standard line, and high line” service requirements, and constructed a closed-loop service quality management system centered on customer experience. In 2025, no material public opinion incidents, such as media exposure arising from the Company’s products or services, occurred.

- The “China Unicom Quality Control (QC) Group Activity Management Measures” were revised and issued to systematically regulate and promote the in-depth development of Quality Control Group (QC Group) activities, and to fully stimulate the quality management and innovation vitality of employees.

- Deepen the quality responsibility mechanism and deeply integrate quality management into the entire process of business operations, R&D innovation, and customer service. Continuously enhance the level of intelligent quality management through the active application of new generation information technologies such as big data and artificial intelligence.

- Extensively organised and carried out quality activities for all employees, cultivating a total of 410 outstanding QC group and team achievements throughout the year, of which 141 were awarded outstanding achievements in the communications industry and 19 were awarded national-level outstanding achievements, with the number of awards continuing to maintain a leading position in the industry. A cumulative total of over 210,000 person-times across the entire system participated in the 2025 Central Enterprise Total Quality Management Knowledge Competition organised by the SASAC of the State Council and the China Association for Quality, continuously promoting the ongoing enhancement of quality awareness among all employees.

Fully ensuring production safety

China Unicom prioritises the protection of people’s lives and safety in its development, firmly establishes the concept of safe development, comprehensively implements the primary responsibility for production safety, and earnestly safeguards the safety of life and property of its employees and the general public.

- Continuously improve the production safety system, strictly implement fundamental systems such as the “Measures for the Supervision and Administration of Production Safety” and the “Detailed Rules for the Implementation of Production Safety Assessment”, and promote the establishment of supporting systems and implementation rules by units at all levels to consolidate the foundation of production safety management.

- Thoroughly carry out the investigation and rectification of risks and hidden dangers, continuously promote the three-year action plan for tackling the root causes of production safety, solidly implement the “Thunder Action” and the “Investigation and Rectification Action for Major Fire Risks and Hidden Dangers in High-rise Buildings”, and conduct risk and hidden danger investigations involving all personnel and covering all fields. Each unit identified 109,500 items of potential hazards, of which 105,900 items have been rectified, representing a rectification rate of 97%.

- Implement safety production training for all employees, and promote post certification and professional safety production training in an orderly manner.

- Each unit utilised occasions such as the Work Safety Month and Fire Safety Publicity Month to continuously organise and conduct publicity and educational learning through various forms, including special seminars, thematic presentations, coaching reports, and video screenings. The entire Company organised a total of over 3,800 training and presentation activities with more than 120,000 participants, and the broadcast volume of work safety warning education videos reached over 170,000 views, covering more than 266,000 people.

- For the full year of 2025, no major or above production safety accidents occurred, and the production safety situation of the entire system remained stable and continued to improve.

Investment in production safety

RMB **2.7** billion

