

Telenor Annual Authority Request Disclosure Report

2023



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1. INTRODUCTION

Respect for privacy and freedom of expression is important for how we at Telenor Group run our business. Our commitment to human rights is long standing and embedded in our top governing document – the Code of Conduct – as well as our Supplier Conduct Principles.

Specific operational requirements are included in various governing documents, including Group-wide requirements for handling authority requests for access to our networks and customer data.

In all our markets there are laws that, in certain circumstances, require operators like Telenor to disclose information about customers to the authorities or to restrict communication. Our efforts to minimize potentially negative impacts such requests may have on privacy and freedom of expression (e.g., possible misuse) extend to systematic monitoring of incoming requests, initiating dialogue with relevant authorities, the industry and other stakeholders on authority requests, and seeking to be transparent by reporting in this area. This is our ninth annual report¹. In our 'Legal overview' reports, most of which were developed in 2017 in cooperation with the Global Network Initiative, you can find relevant information about laws applicable within our markets. These reports contributed to the foundation for the GNI Country Legal Framework Resource, which was most recently updated in 2019 and provides dedicated comparison, download and search features.²

Whilst adopting transparency as a default position, we continue to advocate that this transparency report should not reduce the respective governments' responsibility

¹ Please see our website for more information and previous years' reports: <https://www.telenor.com/sustainability/responsible-business/handling-access-requests-from-authorities/>

² <https://globalnetworkinitiative.org/policy-issues/legal-frameworks/>

to inform the public of the extent of such requests. There are several reasons for this, but most centrally, the same governments that restrict privacy and freedom of expression should also make all reasonable efforts to inform concerned citizens that these powers are used with due care. It is also important to note that in some markets, the relevant authorities have direct access to operators' networks and/or communication data, which means that the operator would not have full visibility on how authorities intercept communication.

Some governments publish reports regarding their use of legal powers to access communication information on a regular basis. We encourage all governments to adopt this practice. In the meantime, we view this document as one of our contributions to increased transparency.

Myanmar

Telenor sold its entire share in Telenor Myanmar to new owners on 24th March 2022 and is not included in this report. More information on Myanmar can be found in the reports for 2021 and 2022.

Malaysia

In 2022, Telenor's company Digi merged with Axiata's operator Celcom and the new merged company Celcom Digi started operations on 1st December 2022. The last available information on Malaysia can be found in the report for 2022.

Thailand

On 1st March 2023 the amalgamation of the two telecommunications operations of True and dtac was completed and the new company, True Corporation, started operations. The last available information on Thailand can be found in the report for 2022.



2. WHY DO WE REPORT

During the reporting period, Telenor Group had mobile operations in six countries across Europe and Asia. In each of these countries, there are laws that require telecom operators to disclose information about their customers to government authorities in certain circumstances.

Over the last few years, there has been an important global public debate about the scope, necessity and legitimacy of the legal powers that government authorities use to access the communications of private individuals or to restrict communication. Questions have also arisen as to the role

that telecommunications network and service providers play in relation to such actions.

Although the authorities have a legitimate need to protect national security and public safety, and to prevent or investigate criminal activities, we recognize that the application of these legal powers in some situations may challenge the privacy and freedom of expression of affected individuals. Considering this, since 2015, Telenor has contributed to transparency in this area through this annual reporting.

3. GOVERNANCE

As a member of the Global Network Initiative (GNI), Telenor is fully committed to the GNI Principles. This includes a commitment to comply with all applicable laws and respect internationally recognised human rights, wherever we operate. Where national laws, regulations and policies do not conform to international standards, Telenor will seek to avoid, minimise, or otherwise address the adverse impact of government demands, laws, or regulations, and seek ways to honour the principles of internationally recognised human rights to the greatest extent possible, without violating national laws.

The Telenor Board of Directors exercises oversight of the area through its Risk and Audit Committee who has direct reporting from the Head of Group Internal Audit. Telenor's commitment to the GNI Principles is also overseen by the GNI Board of Directors through independent assessments. Telenor has completed 2 rounds of independent assessments by an external assessor, in 2019 and in 2022. In both instances and following a detailed review of the assessment by the multi-stakeholder GNI Board representing industry, civil society organisations, investors and academics, it was determined that Telenor is making good faith efforts to implement the GNI Principles with improvement over time.

The Public Report on the Third Cycle of Independent Assessments of GNI Company members 2018/2019 is available here: <https://globalnetworkinitiative.org/wp-content/uploads/2020/04/2018-2019-PAR.pdf>

The GNI Public Report on the Fourth Cycle is available here: https://globalnetworkinitiative.org/wp-content/uploads/2023/10/GNI_PAR23_.pdf

At Telenor Group we find that implementation is the key to ensuring that we properly handle requests from authorities. This requires continuous improvement. We achieve this

through a system of clear top management ownership, dedicated personnel, and systems for checking compliance.

Telenor Group's compliance management system for handling authority requests is built on international standards. Risk assessments identify challenges and is the starting point for definition of group-wide requirements, controls, training ambitions and compliance follow-up.

4. POLICY

In order to address requests from authorities for customer data or access to our networks professionally and systematically we have applied Group-wide requirements to all the Business Areas. These mandatory requirements are part of our governance framework.

The purpose of our governing documents on handling authority requests is to ensure proper handling of such requests in order to limit the risk that our operator's networks / services are leading to negative impact on human rights, restrictions to privacy or freedom of expression. It covers lawful intercept and access to historical data, blocking, network shutdown, distribution of authority information and other authority requests with a possible human rights impact. The governing documents includes requirements relating to:

- **Handling – including checking legal basis and risk of serious human rights impact, challenge and escalation criteria**
- **Escalation – including process for notification in cases posing significant risk**
- **Information – including regular updates to company Board of Directors**

- **Transparency – including a general requirement of transparency to the extent possible**
- **Record keeping – including legal basis and process steps taken**
- **Access to remedy – including a requirement to establish a process to receive complaints from users**
- **Risk assessment & mitigation – including regular reviews of legal frameworks, update of processes, and long-term strategies to minimise negative impact**
- **Improvement over time – including guidelines issued under the principle of comply or explain**

To the extent legally possible and information available (where authorities do not have direct access to the networks), companies also report on an aggregated level the number of requests received annually in the Group ESG reporting system, which forms the basis for our public reporting



5. OUR PROCEDURES

Our local teams across our markets implement procedures for checking that authority requests meet procedural and material requirements for a valid legal basis under local law. When requests lack a clear legal basis or pose a significant risk of serious human rights impact, the local teams shall inform the authority accordingly and refrain from executing the request, to the extent reasonably possible without risking disproportionate reprisals. The local units are also required to interpret requests and legal basis as narrowly as possible.

At the local unit level, expertise on privacy, legal, sustainability, security, communications, and public and regulatory affairs will assess challenging cases and escalate if needed to the local CEO.

Local units are further required to identify risks to customers by monitoring trends in authority requests and legislative initiatives. On that basis, our mobile operators are required to take appropriate action such as promoting incorporation of human rights safeguards into national law or following up historical requests to mitigate human rights impact.

6. HOW WE REPORT

The purpose of this section is to help our readers better understand how we approach authority requests. Through provision of relevant limitations of the report alongside

the definitions we apply, we hope that our readers will be equipped with context and background for reading this transparency reporting.

6.1 LIMITATIONS

When reading this report, it is important to understand that there are inherent limitations to the report.

a. Limitation based on knowledge and permission.

The disclosure in this report is based on what we are permitted to report and what we know:

- In some of the countries we operate, there are laws that prohibit us from disclosing statistics on authority requests, or any information at all that authority requests have been made.
- In some countries the relevant authorities have instructed us not to publish information on authority requests. We have reason to believe that ignoring these instructions could lead to serious sanctions, and in some instances could even pose a threat to our employees.
- In some countries, the law is unclear on whether we are allowed to publish and at the same time, we have reason to believe that publishing could lead to serious sanctions, and in some instances could even pose a threat to our employees.
- In some countries we are legally obliged to allow permanent direct access to our network with no control or visibility over the interception activities that authorities carry out in addition to the requests sent to Telenor.

For countries where we are unable to report due to any of the reasons above, we have indicated this by inserting a dash (-) in the relevant box in the reporting form.

b. Limitation on impact demonstration

Although the number of requests that we have received and met provide a sense of scale, there are several reasons why these do not provide an accurate picture of the requests' actual privacy and freedom of expression impact. One reason for this is that a single request, depending on the legal framework in each country may cover an unspecified number of individuals, or communications services or devices used by these individuals. On the other side, one individual can in many circumstances be subject to several simultaneous or consecutive requests related to the same investigation.

As the above mentioned indicates, there are many variables to consider in order to give a picture that is as accurate as possible of the request's actual privacy and freedom of expression impact. To a large extent, these variables will also be incommensurable from one country to another.

For this reason, we have tried to complement the basic data about number of requests with other information where we have it available, such as the number of accounts that have had restrictions imposed, the number of sites that are blocked, the subject with which requests are concerned, etc.

6.2 DEFINITIONS

<p>LAWFUL INTERCEPT</p> <p>Covers real-time interception (i.e. wire-tapping, positioning for emergency situations, etc.), in particular:</p> <ul style="list-style-type: none"> • Request for real-time access to the content of communications • Request for real-time access to traffic data • Request for access to real-time location information, i.e. access to information on the location of mobile terminals/phones <p>One single request can include several MSISDN, IMEI, USER-ID etc.</p>	<p>HISTORICAL DATA</p> <p>Covers all requests for the provision of historical data:</p> <ul style="list-style-type: none"> • Request for access to any historical traffic or communications data • Request for access to any subscription data • Request for access to historical location information • Request for any other personal information stored by operator – e.g. regarding employees, visitors and surveillance videos. • Request for other types of customer data such as name, physical address, services subscribed and historical location data. <p>One single request can include several MSISDN, IMEI, USER-ID etc.</p>
<p>FREEZE OF HISTORICAL DATA</p> <p>Covers all requests for freeze of data. Requests to provide authorities with access to frozen data are not covered by the concept.</p>	<p>BLOCKING</p> <p>Covers all requests for blocking including blocking of specific IP-addresses, ports, URLs or of specific OTT services.</p> <p>Shutdown of a full network or of for instance 3G is not counted as blocking, see Network shutdown.</p>
<p>ELEMENTS BLOCKED</p> <p>This is the total number of blocked elements including URLs, IP addresses, ports, and specific OTT services at the end of the year. Blocking implemented in previous reporting periods which continue to be in place are also included in the numbers we report.</p>	<p>NETWORK SHUTDOWN</p> <p>Covers shut down of the mobile or fixed network or parts of it. Requests to close down 2G, 3G, 4G, 5G and/or data are also counted.</p> <p>A single request to shut down a network over several time periods are counted as a single request. Similarly, a single request to shut down a network in several different areas are counted as a single request.</p>
<p>DISTRIBUTION OF AUTHORITY INFORMATION</p> <p>Covers all requests for sending out information from an authority to all or part of our customer base irrespective of means. The means is typically SMS.</p> <p>This category does not include requests for distribution of information on commercial basis by means of services that are already effectively offered to all political actors.</p>	<p>ACCOUNT RESTRICTION</p> <p>This counts the number of requests for restriction(s) of specific accounts. Restrictions may take any form such as denial of access to a specific IP addresses or complete closure of an account.</p> <p>Requests to restrict all accounts, or all accounts with few exceptions, are not counted. See blocking and network shutdown.</p>
<p>NUMBER OF ACCOUNTS AFFECTED</p> <p>The total number of accounts affected by requests. If a single account is affected by two different requests, the account is counted twice.</p> <p>Where the number of accounts affected is not known, the number of MSISDNs may be provided instead. An MSISDN is a unique connection between a phone number and a SIM in a device. The number is in practice the number of SIM cards. Where the number concerns MSISDNs affected, it is explicitly stated.</p>	<p>COMPLAINTS RECEIVED</p> <p>This includes all complaints received from users due to authority requests. If Telenor receives a complaint from a credible representative of the people impacted by an authority request or from a non- governmental organisation, the complaint is also counted.</p>
<p>POPULATION</p> <p>As reported by UNFPA, numbers for 2023.</p>	<p>MOBILE SUBSCRIBERS</p> <p>As reported by Telenor in 2023 Q4 Report.</p>
<p>GDP PER CAPITA (PPP CURRENT \$)</p> <p>As reported by World Bank International Comparison Program, numbers for 2022.</p>	<p>UNDP HUMAN DEVELOPMENT INDEX, GLOBAL RANK</p> <p>As reported by UNDP in Human Development Index 2021 report.</p>
<p>WJP FUNDAMENTAL RIGHTS, GLOBAL RANK</p> <p>As reported by World Justice Project in Rule of Law Index 2023.</p>	<p>FREEDOM HOUSE, INTERNET FREEDOM SCORE</p> <p>As reported by Freedom House, 2023 (only available for Asian units)</p>



7. Country Overview





BANGLADESH

Basic facts	
Population	173 mill. ⁶
Mobile subscribers	81.97mill. ⁷
GDP per capita (PPP current international \$)	\$ 7,397 ⁸
UNDP Human Development Index, global rank	#129/191 ⁹
WJP Fundamental Rights, global rank	#137/142 ¹⁰
Freedom House: Internet Freedom Score	41/100 ¹¹

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	-	-	No information on requests available for reporting.
Historical Data	3014832	100%	
Freeze of historical data	-	-	No information on requests available for reporting.
Blocking	306	99%	1901 elements were blocked at the end of the year. For all elements, users will be notified of the blocking when trying to access the elements concerned.
Network Shutdown	9	100%	
Distribution of authority information	355	100%	
Account Restriction	-	-	No information on requests available for reporting.

Complaints received: The company received no complaints.

⁶ <https://www.unfpa.org/data/world-population-dash-board>

⁷ Financial reports - Quarterly - 2023 - Telenor Group⁸ <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

⁹ <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

¹⁰ <https://worldjusticeproject.org/rule-of-law-index/country/2023/>

¹¹ <https://freedomhouse.org/countries/freedom-net/scores>



DENMARK

Basic facts	
Population	5.9 mill. ¹²
Mobile subscribers	1.69 mill. ¹³
GDP per capita (PPP current international \$)	\$ 74,897 ¹⁴
UNDP Human Development Index, global rank	# 6/191 ¹⁵
WJP Fundamental Rights, global rank	#1/142 ¹⁶
Freedom House: Internet Freedom Score	NA ¹⁷

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	2487	99%	
Historical Data	1764	99%	
Freeze of historical data	1163	99%	
Blocking	15	100%	2943 elements were blocked at the end of the year. For all elements, users will be notified of the blocking when trying to access the elements concerned.
Network Shutdown	0	0	
Distribution of authority information	3	100%	
Account Restriction	0	0	

Complaints received: The company received no complaints.

Industry disclosure: The company further contributes to public disclosure through Danish Telecom Industry Association. See in particular the list of blocked sites: <http://www.teleindu.dk/brancheholdninger/blokeringer-pa-nettet>

¹² <https://www.unfpa.org/data/world-population-dash-board>

¹³ Financial reports - Quarterly - 2023 - Telenor Group

¹⁴ <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

¹⁵ <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

¹⁶ <https://worldjusticeproject.org/rule-of-law-index/country/2023/>

¹⁷ Not ranked



FINLAND

Basic facts	
Population	5.5 mill. ¹⁸
Mobile subscribers	2.76 mill. ¹⁹
GDP per capita (PPP current international \$)	\$ 59,470 ²⁰
UNDP Human Development Index, global rank	11/191 ²¹
WJP Fundamental Rights, global rank	3/142 ²²
Freedom House: Internet Freedom Score	NA ²³

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	2620	100%	
Historical Data	10843	100%	
Freeze of historical data	0	0	
Blocking	0	0 ²⁴	
Network Shutdown	0	0	
Distribution of authority information	0	0	
Account Restriction	0	0	

Complaints received: The company received no complaints

¹⁸ <https://www.unfpa.org/data/world-population-dash-board>

¹⁹ Financial reports - Quarterly - 2023 - Telenor Group

²⁰ <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

²¹ <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

²² <https://worldjusticeproject.org/rule-of-law-index/country/2023/>

²³ Not ranked

²⁴ Websites blocked because of EU sanctions against Russia are not included



NORWAY

Basic facts	
Population	5.5 mill. ²⁵
Mobile subscribers	2.65 mill. ²⁶
GDP per capita (PPP current international \$)	\$ 114,923 ²⁷
UNDP Human Development Index, global rank	#2/191 ²⁸
WJP Fundamental Rights, global rank	#2/142 ²⁹
Freedom House: Internet Freedom Score	NA ³⁰

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	954	100%	
Historical Data	6386	100%	
Freeze of historical data	88	100%	
Blocking	0	0	
Network Shutdown	0	0	
Distribution of authority information	0	0	
Account Restriction	0	0	
Other	1	0	

Complaints received: The company received no complaints.

²⁵ <https://www.unfpa.org/data/world-population-dash-board>

²⁶ Financial reports - Quarterly - 2023 - Telenor Group

²⁷ <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

²⁸ <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

²⁹ <https://worldjusticeproject.org/rule-of-law-index/country/2023/>

³⁰ Not ranked



PAKISTAN

Basic facts	
Population	240.5 mill. ³¹
Mobile subscribers	44.37 mill. ³¹
GDP per capita (PPP current international \$)	\$ 6,351 ³²
UNDP Human Development Index, global rank	#161/191 ³³
WJP Fundamental Rights, global rank	#125/142 ³⁴
Freedom House: Internet Freedom Score	26/100 ³⁵

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	-	-	No information on requests available for reporting.
Historical Data	3	100%	
Freeze of historical data	19	100%	
Blocking	8	100%	
Network Shutdown	70	84%	
Distribution of authority information	49	100%	
Account Restriction	0	0	
Others	11	100%	

Complaints received: The company received no complaints.

³¹ <https://www.unfpa.org/data/world-population-dash-board>

³² Financial reports - Quarterly - 2023 - Telenor Group³⁸ <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

³³ <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

³⁴ <https://worldjusticeproject.org/rule-of-law-index/country/2023/>

³⁵ <https://freedomhouse.org/countries/freedom-net/scores>



SWEDEN

Basic facts	
Population	10.6 mill. ³⁶
Mobile subscribers	2.96 mill. ³⁷
GDP per capita (PPP current international \$)	\$ 65,157 ³⁸
UNDP Human Development Index, global rank	#7/191 ³⁹
WJP Fundamental Rights, global rank	#4/142 ⁴⁰
Freedom House: Internet Freedom Score	NA ⁴¹

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	3017	98%	
Historical Data	21384	96%	
Freeze of historical data	15	7%	
Blocking	0	0 ⁴²	3 elements were blocked at the end of the year.
Network Shutdown	0	0	
Distribution of authority information	56	100%	
Account Restriction	0	0	
Others	13	100%	This includes 12 requests from Connexion.

Complaints received: The company received no complaints.

Disclosure by public institutions: Further information can be obtained from relevant public institutions. See in particular: The Swedish Commission on Security and Integrity Protection: <https://www.sakint.se/>

The Swedish Prosecution Authority: <https://www.aklagare.se/>

³⁶ <https://www.unfpa.org/data/world-population-dashboard>

³⁷ Financial reports - Quarterly - 2023 - Telenor Group

³⁸ <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

³⁹ <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

⁴⁰ <https://worldjusticeproject.org/rule-of-law-index/country/2023/>

⁴¹ Not ranked

⁴² Websites blocked because of EU sanctions against Russia are not included