

telenor | fiber

25 February 2025

## Report on the Norwegian Transparency Act

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[www.telenor.com](http://www.telenor.com)

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## Introduction

This report has been prepared in accordance with Section 5 (§ 5) of the Norwegian Transparency Act and provides a summary of Telenor Fiber AS' (**Telenor Fiber**) approach to identify and assess actual and potential adverse impacts to human rights and decent working conditions in the operation of Telenor Fiber and in our supply chain and business partners.

Telenor Fiber is part of Telenor Group and this report is a supplement to the transparency report included in the annual report prepared by Telenor ASA which can be found here: [www.telenor.com](http://www.telenor.com)

The company has been in operation since January 2023 and has fulfilled the "large enterprise" criteria in the Transparency Act Section 3 (§3) for two consecutive years. Telenor Fiber did not have any duty to carry out a human rights impact assessment in 2023 as there were no activity in the company before 1 January 2023. On this background, Telenor Fiber has carried out activities to identify our actual and potential negative human rights impact to cover activities throughout the year of 2024.

This report has been prepared and approved by the management of Telenor Fiber and was approved by the Board of Directors on 25 February 2025. The report covers the financial year ending 31 December 2024.

## Organisation and general information

### Telenor Fiber AS – Our business

Telenor Fiber is a Norwegian infrastructure company that owns, operates and develops new fibre infrastructure for gainful use in the Norwegian market. Telenor Fiber AS was established in 2022 and is a subsidiary of Telenor ASA. A decision to divest the Fibre Business from Telenor Norge AS (**Telenor Norge**) into Telenor Fiber through a corporate demerger was effectuated in January 2023. Following the demerger, Telenor Fiber owns passive fibre assets in Norway. Telenor Networks Holding AS owns 70% of the shares of Telenor Fiber, whereas 30% of the shares was divested to a consortium led by KKR & Co. Inc. The consortium includes Oslo Pensjonsforsikring as a co-investor.

Telenor Fiber provides the lease of fibre infrastructure on an exclusive basis to Telenor Norge AS. Telenor Fiber AS will not enter into any customer agreements with end-users nor any wholesale customers of the fibre infrastructure.

Telenor Fiber has six employees and is located at the Telenor Headquarter office in Norway, Fornebu.

### Telenor Fiber's supply chain

Telenor Norge is Telenor Fiber's main supplier of all customary fibre infrastructure services related to developing (fibre roll-out), operating and maintaining the infrastructure.

Other than Telenor Norge, the main supplier categories and business partners in Telenor Fiber's supply chain include contractors, third party owners of poles, third party owners of fibre infrastructure, suppliers of information systems and IT, and internal service providers within Telenor Group and Telenor subsidiaries. Telenor Norge manages, on behalf of Telenor Fiber, the day-to day operations including all parts of the dialogue and contract relation with third parties.

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Reference is made to the transparency report of Telenor Norge AS. The report can be found here: [www.telenor.no](http://www.telenor.no)

### Governance and Oversight

As part of Telenor Group, Telenor Fiber adheres to Telenor's governing policies and guidelines. The governance framework guides our decision-making processes and ensures responsible business conduct throughout our operation. Internal guidelines and routines are assessed on a regular basis to address and mitigate potential negative consequences for human rights and working conditions. The governing documents are implemented in Telenor Fiber and available to all employees. The relevant policies are:

- The Code of Conduct which sets out how Telenor operates as a responsible company by addressing how transparency, accountability and integrity are embedded in all work
- The Supplier Conduct Principles
- The Anti-Corruption Policy
- Business Partner Management Policy
- People Policy
- Health, Safety and People Security Policy

Respect and promotion of human rights is the foundation for how Telenor conducts business. Telenor is committed to respecting and promoting human rights and strives to be trusted by stakeholders.

Telenor's human rights commitment is embedded in the company's Code of Conduct, Supplier Conduct Principles and Human Rights policy requirements, which are anchored in the following human rights instruments:

- The Universal Declaration of Human Rights (UDHR),
- The International Covenant on Civil and Political Rights (ICCPR),
- The International Covenant on Economic, Social and Cultural Rights (ICESCR), and the
- ILO Declaration on Fundamental Principles and Rights at Work.

The governance process in Telenor Group ensures that all Telenor companies are committed to respecting human rights in accordance with the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Global Compact and the Global Network Initiative (GNI) Principles on freedom of expression and privacy. This includes designated resources to undertake human rights due diligence across the organization in order to identify and address any negative potential and actual human rights impacts, as well as meaningful engagement with stakeholders.

Telenor respects labour rights principles as laid down in the UN Global Compact and the ILO Declaration on Fundamental Principles and Rights at Work. These principles are reflected in Telenor's Code of Conduct, the People Policy, and Supplier Conduct Principles. If there are differences between applicable laws and regulations and the standards set out in the Code of Conduct, Telenor will apply the higher standard consistent with applicable laws and regulations.

It is the responsibility of the company to provide a safe and secure workplace for employees, including the prevention of both physical and mental harm. The company is bound by the rules and regulations in the Employment Protection Act and complies and adheres to the guidelines set forth by the International Standards Organization ISO 45001. The goal of ISO 45001 is the reduction of

occupational injuries and diseases, including promoting and protecting physical and mental health. An organization committed to worker health, safety and wellbeing, boosts reputation, morale and retention.

All Telenor companies are required to perform human rights due diligence to identify, manage and mitigate human rights related risks and impacts resulting from the company's own activities and those in the value chain. Training and capacity building relating to identified human rights risks are key to Telenor's approach to mitigation. For employees, Code of Conduct training and anti-corruption training have been completed by 100% in Telenor Fiber's employees which includes human rights considerations. Identified experts in Telenor Fiber working with human rights have undertaken Human Rights Due Diligence training in 2023 and 2024.

At Telenor, supply chain governance is managed by dedicated procurement teams. At the Global level, Telenor Procurement Company (TPC) is responsible for establishing and managing Global Framework Agreements (GFAs) that may serve multiple markets.

More about how due diligence in the supply chain is conducted within Telenor is further described in the Telenor Group Annual report.

To facilitate reporting and query aimed at helping us uncover negative consequences and address concerns, we utilize Telenor Integrity Hotline. The Integrity Hotline is a confidential whistleblowing channel to ask questions and raise concerns about possible breaches of Telenor's Code of Conduct, including relevant laws, regulations and Governing Documents. The service is accessible online to employees as well as external stakeholders and is available 24 hours a day, seven days a week.

## Activities to identify actual and potential negative human rights impacts

Our starting point on human rights is the Telenor Way of doing business—the vision and values that define a common approach for how we do business at Telenor.

The **Telenor Code of Conduct** defines the core principles and ethical standards that form the basis on how we create value in our company. All Telenor companies are required to conduct and document regular human rights due diligence to identify, address and manage human rights related risks and impacts resulting from the company's own activities and those in the value chain.

Through our human rights due diligence and risk assessment Telenor Fiber did not identify any actual negative human rights impacts in our business nor in our supply chain in 2024. We have, however, identified two areas with significant risk for potential negative human rights impacts that we will continue to assess during 2025. These risks include:

- Risks related to decent working conditions in our local and global supply chain
- Risk related to HSE and psycho-social work environment of Telenor Fiber employees

### Supply chain risks

Telenor Fiber's occupation is developing, operating and maintaining fibre infrastructure in Norway which requires a continuous focus to promoting and ensuring that HSE rights of entrepreneurs, contractors and suppliers are respected throughout our supply chain.

While Telenor Fiber has not identified any actual negative human rights impact in the current supply chain, we will closely monitor identified areas with potential risk for negative impacts related to decent working conditions in our supply chain. We will therefore continue our human rights impact assessment in 2025 by focusing on:

- Risk related to Health, safety and environment (HSE) for foreign workers
- Risk related to Wages, Hours and Benefits

#### Risks related to HSE

In the reporting period, Telenor Fiber has not detected any actual negative impacts on human rights and working conditions in our own operation.

Employee Engagement Survey is conducted annually with a 100% response rate in Telenor Fiber in 2023 and 2024. The team results in Telenor Fiber are, however, not disclosed since the company only comprised 5 employees in the period, and hence being too few responders to ensure anonymity.

Telenor Fiber has not identified any risk to working conditions in our own operation. We will continue our human rights impact assessment in 2025 by focusing on:

- Psychosocial risk factors may affect workers' psychological response to their work and workplace conditions. Examples are high workloads, tight deadlines, and lack of overlapping competencies within the team due to the lean setup of the Company

### Activities to prevent and mitigate negative human rights impacts

#### Mitigating activities related to risks related to working conditions in our local and global supply chain

Telenor Fiber, as an employer and owner of passive infrastructure, is legally responsible to ensure safe and secure working environments in compliance with HSE standards for building assignments or their representatives according to statutory obligations and contractual assignments.

Supplier Conduct Principles (SCP) set out Telenor's requirements towards its business partners on responsible business conduct and mirror the Telenor's Code of Conduct. They are based on internationally recognized standards and include human rights, health and safety, working conditions/labour rights, freedom of expression and prohibited business practices. All partners and suppliers in a contractual relationship with Telenor are required to comply with Telenor's SCP. By complying with Telenor's SCP, they are legally obliged to ensure the requirements are met in their associated supply chain through the Agreement on Responsible Business Conduct (ABC). Where suppliers/partners comply with Telenor's SCP, they are legally obliged to ensure that requirements are met in their associated supply chain through the ABC.

Telenor is committed to upholding responsible business practices within the supply chain through high sustainability standards and continuous improvement. Telenor carries out due diligence in the supply chain to identify, assess, avoid and mitigate human rights and other SCP risks. Telenor has implemented a set of policies guiding its approach in this area with the aim to reach zero injuries to employees and business partners. There are rigorous safety protocols and training programs in place

to conduct risk assessments. Telenor has a systematic approach to incident investigations, aiming to facilitate learning, provide training and monitor risks.

Reference is also made to the transparency report of Telenor Norge AS. The report can be found here: [www.telenor.no](http://www.telenor.no)

#### Mitigating activities related to HSE

HMS training is mandatory for the managers in Telenor Fiber, to be renewed every 5 years as a requirement.

In accordance with the Norwegian Labour Inspection Authority framework, the company has a safety representative who has the role as an intermediary between the employer and the employees to create a safe workplace through health, safety and environment work (HSE).

An HSE action plan has been established for Telenor Fiber, updated annually, and approved by the company. The action plan has focus on the physical and psychosocial working environment, as well as HSE training and actions related to sick-leave risks and the overlap of competencies.

All workstations are ergonomically designed to promote better posture, reducing the incidence of repetitive strain injuries, as well as reducing fatigue and exertion so employees are more likely to be engaged and productive without feeling exhausted or experiencing pain.

Synergi Life is the tool used for reporting all incidents and accidents, or potentially dangerous situations in the workplace. All employees have access to the system.

The company participates in the Annual Employee and Engagement survey to gain feedback from the employees to create an even better workplace, as well as to identify areas for improvement.

Fornebu, 25 February 2025  
Telenor Fiber

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Chair

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