

Equality Statement for Telenor Infra for 2021:

This equality statement is prepared for the company Telenor Infra AS. Telenor Infra is a provider of mobile infrastructure services in Norway. The Company was established in 2020 through merger of three independent companies. Telenor Infra consisted of 85 employees per 31.12.2021 spread across 8 locations with Fornebu being the headquarter. Due to turnover a total of 90 employees are included in the diversity and inclusion analysis below.

Part 1 Equality Statement

In Telenor Infra, we work for equality and against all discrimination on the basis of gender, pregnancy, parental or adoption leave, care responsibilities, ethnicity, religion, beliefs, disability, sexual orientation, gender identity, gender expression and any combinations of these. The factual situation concerning equality in Telenor Infra for the period January-December 2021 is presented here.

1 Distribution of women and men by position level and gender pay differentials

	Gender representation per position level (number of employees)		Pay differentials (women's share of men's salary as a percentage)		
	Women	Men	Contracted Annual Base Salary	Contracted Total Compensation*	Actual payroll (all taxable income)
Total distribution	26	64	101 %	104 %	104 %
Level 6	2	2	140 %	144 %	118 %
Level 5	5	12	113 %	115 %	140 %
Level 4	8	24	86 %	87 %	84 %
Level 3	9	25	92 %	91 %	87 %
Level 2	2	1	N/A	N/A	N/A

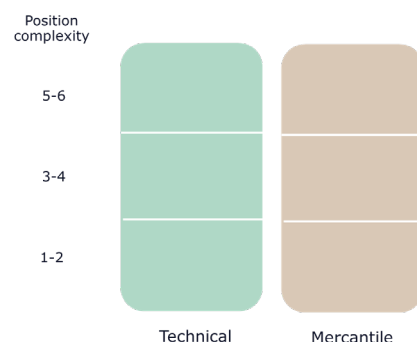
* Total compensation is benefits entitled to employees either through employment agreements, separate agreements or policy. Such entitlements include annual base salary, any car allowance, managerial bonuses, and other minor reward -elements

Distribution between men and women across the two job families in Telenor Infra :

	Share of women per job family
Total	29%
Mercantile Family	48%
Technical Family	10%

1.1 Definition of employee categories

Telenor Infra has a job framework consisting of two families and six position levels which all employees are mapped against. The model and the principles for placement has been deliberated with unions. Beyond improved granularity in various analysis of our workforce the model shall, among other things, identify possible carrier paths for employees. The position complexity is based on an assessment based on independence of role, educational - and experience requirements in the role, managerial duties, span -of-control, subject matter expertise and stakeholder complexity. 6 represents the highest level of complexity, 1 the lowest. Infra does not have any roles on 1 and most of our roles are situated on level 3 and 4.



The model was introduced late 2021. In the continuation further quality assurance of the data as well as continuous calibration/placement within the model will be performed. A particular focus for Telenor Infra has been to improve visibility on our technical staff.

Due to a small population we will in this report not portray salary information between these two groups, but rather combine them. Different trades/disciplines give rise to different compensation levels which should be noted.

1.2 Wage differences, further explanation

At company level, women's share of men's salary is 101% in terms of average contractual basic salary, 104% in contracted (estimated) total compensation and 104% in actual payroll differences. The main explanatory factors on the aggregated data would be

- 1) Small population where individual differences impact on top-level figures – especially among the higher paid positions and distribution between men and women in these roles.
- 2) Larger share and count of women in the higher paid roles (position level 6 and 5) compared to the lower levels
- 3) Several new hires in position level 5 and 6 in 2021 where additional extra remuneration (ie. bonus) were not fully accrued.

Differences in age and seniority (2 years and 1 year respectively) are minimal and are not significant contributors on the aggregated results.

Worth noting is that Telenor Infra was established in 2020 through the merger of 3 companies with different compensation and reward systems and levels. 15% of the employees have been recruited elsewhere later, but all others carries legacy from these 3 companies. It is uncertain if disparities has been inherited as a result. Throughout 2020-21 the rewards systems have been harmonized and has become more addressable.

Position Complexity 6 and 5

The mercantile job family on these levels consists of senior leadership roles with significant responsibility and complexity. Oppositely in the technical family does the roles require deep engineering expertise and insight, but lesser managerial duties. Generally, the roles with personnel - and/or P&L responsibility are remunerated higher than the expert roles in Telenor Infra. The expert roles on these two levels are exclusively held by men while the most senior management roles are held by women.

30% of the population in these two groups was hired in 2021 and had limited accrual of these additional reward elements such as bonus which in part explains the gap -increase from contracted rights and payrolled income.

Position Complexity 4 and 3

The main explanatory factor for the difference is women on these levels are mostly holding administrative roles while men are holding engineering jobs. As shown are women less represented in the technical disciplines in Infra. The remuneration difference is explained by higher salary levels among engineers and technicians than in the administration and support functions.

Position Complexity 2 & 1

With a population of only 3 the numbers are masked to maintain privacy. At position complexity 1 Telenor Infra had no employees in 2021

Pension:

Telenor Infra has a defined contribution pension scheme for everyone employed after January 1st 2006, which means that deposits calculated by pensionable salaries up to 12G (G = the national insurance ground amount) are made in funds with varying equity shares. Telenor also has a defined benefit pension scheme that closed in 2006 and provides a share of salary up to 12G as a lifetime benefit.

1.3 Temporary employment, parental leave, part time and sick leave

We have mapped gender distribution related to temporary employment, parental leave, actual part-time and involuntary part-time work:

Total gender balance in the company		Temporary employees		Parental leave		Actual part time		Involuntary part time	
Share of workforce		In numbers		Average number of working days used		In numbers		Percentage of all employees	
Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
29 %	71 %	1	0	121	12	1	0	0 %	0 %

Temporary employees :

Telenor Infra has throughout 2021 had one temporary employee. The employee was a summer intern and the employment ended as studies resumed after the summer holiday.

Parental leave :

In 2021, 3 employees claimed parental leave according to Norwegian law (Section 12 -5 of the Working Environment Act). Worth noting to the above figure is due to transfers within the company the averages are skewed as part of the parental leave is registered with Infra and the remainder with other parts of the organization. It is also not reflecting parental leave happening across two calendar years. Although there is freedom of choice within the framework of the Act with regard to which parent takes leave, Telenor Infra encourages that men should have equal opportunity, and acceptance for, taking parental leave.

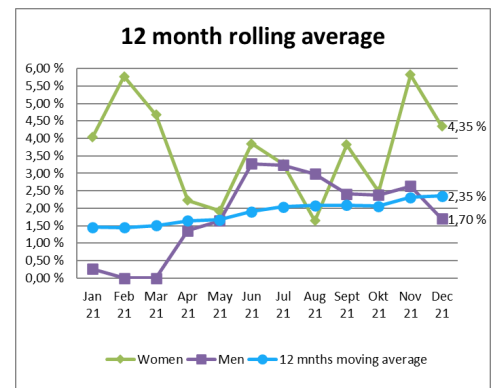
Part time

Telenor Infra has had 1 part time employees in 2021. This is an employee working part time for Telenor Infra next to studies. Conversion to full time employment been viable or desirable for the employee .

Sickness absence and health & safety:

The 12-month rolling sick leave average for Telenor Infra was 2,35% . Of this was 1,99% prescribed to long -term sick leave while the remainder was short term /self -prescribed . Sickness absence among women was 4,35 % . Men's sick leave was 1,7%. Of the long-term sick leave none exceeded the limitations set by Norwegian authorities and all was of shorter duration (16-90 days). Of what has been reported we have seen three long term sick leaves being work related (fatigue/stress /conflict) while the remainder has been non-work related (illness/sickness/personal reasons) .

Telenor Infra did not have accidents or injuries occurring at work in 2021 resulting in absence or sick leave. Telenor Infra has as an unavoidable health & safety risk related to outdoor working, working in heights and unfavorable conditions. The step-up within HSE in 2021 has significant and thought to be appropriate to mitigate the inherent risk of our operations .



Part 2: How we work to ensure equality and non -discrimination in practice

2.1 Principles, procedures and standards for equal opportunity and against discrimination

Telenor Infra is committed to all Telenor personnel policy documents, where equality, anti-discrimination, diversity and inclusion form a key part, including in the Code of Conduct, where it is established that:

"All employees deserve a workplace environment, independent of work location, that is free from harassment, intimidation, discrimination or threats of violence for any reason, including actions based on gender, sexual orientation or identity, race , ethnicity, disability, national origin, religious or cultural beliefs or citizenship.

- *We view employee diversity as a competitive advantage, as it broadens our perspective and allows us to better understand our customers' needs and wants*
- *Telenor does its utmost to actively promote equality in all employment practices*
- *We foster a working environment where people are treated honestly and professionally and are valued for their unique ideas and differences".*

Telenor Infra conducts, as part of Telenor Group, mandatory annual training in the understanding of the Code of Conduct, including dilemma training for all employees. This was also carried out in 2021 with 100% completion. Violations of the Code of Conduct and other guidelines shall be addressed with the immediate manager or can be reported through Telenor's whistleblowing channel. In the Employee Survey in the fall of 2021, 85 % of Telenor Infra employees said that they feel they

could report violations of the Code of Conduct if they were to observe any. 11 % answered neutrally, while 5 % answered negatively. 96% reported that their manager was a good role model of the Code of Conduct

Telenor Infra is compliant with Telenor's Group Manual for Diversity and Inclusion and People Policy, where diversity and inclusion have been a priority in 2021. Telenor Infra is also covered by Telenor's whistleblowing procedures, including the Integrity Hotline whistleblowing channel, where reports of violations of Telenor's guidelines can be made, also anonymously. Cases reported to the Integrity Hotline are followed up by our Compliance function with necessary investigations and measures. This applies to all negative/reprehensible incidents, including in the equality area. In 2021, no issues concerning equality/discrimination were raised as far as Telenor Infra is aware.

In 2021, Telenor also created guidelines for flexibility, giving employees the opportunity to mostly choose the location where they work. This helps ensure work-life balance. These guidelines have been implemented through Telenor Infra's "Flexible Way of Work"-policy. The policy was deliberated with managers and unions before being implemented. In the forementioned employee survey 82% answered favorably to having the necessary flexibility to manage work and private life.

In the 2021 annual increment process Telenor Infra offered to our four employee unions a higher salary increase to the lowest paid population of Infra than the rest of the employees.

Telenor Infra is bound by collective bargaining, collective agreements and special agreements between Telenor Infra and the EL and IT Federation, NITO, Tekna and Negotia. The collective agreements also include provisions for equality and diversity. Telenor Infra has an active collaboration with all four unions and follows up the obligations in the collective agreements in close cooperation with them, both in formal and informal meetings.

3 How we work to identify the risk of discrimination and barriers to equality

3.1 Overall structure for working on equality

Telenor Infra's management and union representatives are focused on complying with our internal policy documents, including equality policy. In the revised People & Org-strategy for Telenor Infra this became an integral part under the pillar "Sustainable employment practices"

Equality issues are mainly considered as an integrated subject in various meeting points between management and union representatives, who regularly meet with an open agenda, both formally and informally. In 2021, an important area of dialogue has been the discussions with union representatives concerning the introduction of increased work location flexibility, among other reasons to ensure work-life balance. The elected representatives as well as the administration in Telenor Infra has also had emphasis on correcting imbalances in compensation and reward stemming from the legacy of the companies merged into Telenor Infra. This has been adjusted both through collective processes as well as individual salary reviews.

The Working Environment Committee (WEC) plays an important role in various topics related to health, safety and the environment. WEC met four times in 2021. Specific issues related to the pandemic and facilitation of the work situation for employees, both at workplaces and at home offices, have been on the agenda for WEC in the last year, in addition to sickness absence, follow-up of the employee survey, workload, use of the occupational health services and work location flexibility.

Telenor has its own platform for employee learning (Telenor Academy), where there is a considerable amount of course material regarding equal opportunity topics, such as Unconscious Bias learning modules.

Telenor Infra has a strategic goal of increasing the share of women in technical disciplines from the current level of 10% to 16%. Furthermore have Telenor Infra discontinued a former practice of offering voluntary severance agreements to all employees over 62 years of age. This both to retain critical competency but also to cater for being a "livsløps"-employer, also for elderly colleagues.

3.2 We discovered the following discrimination risks and barriers to equality

Our Employee Engagement Survey (EES), which was referred to in the previous chapter, is an important mapping tool for uncovering discrimination risk and the barriers to equality and is run annually in the fall. The previous EES was conducted in the

fall of 2021. Following are some examples of results showing how employees perceive the overall equal opportunity situation in Telenor Infra:

With 92% answering favorably to the question “I feel able to be myself at work” Telenor Infra believes that our employees feel the content of our Code of Conduct in their everyday work life and that we cater for diversity. When asked whether employees feel that everyone has the same opportunities for development regardless of gender, nationality, age, physical abilities, personal background, or any other cause of discrimination, 79 % answer positively, 16 % neutrally and 4 % negatively. Albeit a high number Telenor Infra do score somewhat lower than other Norwegian companies in Telenor and we are cautious of this in future recruitment- and promotion settings.

Although the vast majority of employees responds positively or neutrally to such questions, it is important to continue the efforts and making the promoters even more satisfied and turnaround those being negative. Further mapping of reasons and implementation of measures are handled locally in separate follow-ups of EES results in individual departments. For 2021, the company has in dialogue with union representatives identified a range of actions.

In addition, we point out the following risk factors for the state of equal opportunity in Telenor Infra:

- There is generally a relatively large gender imbalance within technical disciplines, with a predominance of men at all levels except senior management.
- We have not had a single qualified female applicant for our engineering vacancies in 2021
- Although most differences in wages between men and women have explainable causes or individual differences makes it sensible, it is an area for attention. Particularly where the differences are inexplicable.
- There is higher sickness absence among women than among men

A dilemma Telenor Infra faced in 2021 was the security clearance process with Norwegian authorities. Most of our employees needs clearance to “Confidential” due to work with critical national infrastructure. The process itself takes significantly longer with employees born outside Norway and/or shorter tenure as citizens of Norway. We have also in 2021 experienced application(s) declined due to this. If the practice from National Security Authority (NSM) is to be understood applicable for all immigrants outside Europe it will come with negative consequences for our ability to hire other ethnicities than Norwegians, and hamper efforts to have a diverse and inclusive workforce.

3.3 Possible causes of risks and hazards

We have found the following possible causes of risks and hazards in our assessments:

- The wage differences between men and women at the company level are largely due to the predominance of men in engineering positions and women in non-managerial administrative positions.
- In general, there is considerable competition for qualified labor within Telenor Infra’s domain, and there are significantly fewer women than men who have an education in engineering and are applying for jobs in technological areas.
- The massive volume/production increases due to 5G infrastructure roll-out put increases our workload potentially yielding higher sick -leave, “quick -fixes” when it comes to recruitment and temporary employment, use of overtime, etc. Although no statistical indication of issues, the topic is frequently discussed with unions and in management.
- The gender imbalance that exists in the technical disciplines may make it more difficult both to recruit and to retain female employees in the future.

3.4 We have initiated/implemented the following measures in 2021:

Initially, Telenor Infra follows a process for follow -up of our employees, called People Dialogue. This includes established processes for appraisals, defining goals and setting development plans for employees. The immediate manager is responsible for following up employees and this shall, in accordance with our personnel policy, take place without any form of discrimination on any basis.

Gender:

Telenor Infra, as part of Telenor Group, is a partner for the SHE program, which focuses on increasing the number of women in senior management. Telenor’s Norwegian companies rank high on gender balance in the SHE -survey – number 3 in 2021.

Telenor Infra's management team has female representation of 50%. In 2021 we employed our first female to head up an engineering/technical function. A good starting point for Infra. For the targets set for 2022 Telenor has included increase of women in technical disciplines and we have allocated headcounts only to be filled in case of qualified female engineers applying.

Disabilities:

Telenor Infra participates in the Open Mind program, which is operated by Telenor Norway. The program gives work training for two target groups, namely persons with disabilities and persons with an immigrant background from countries outside the EU. During 2021, Telenor Infra did not have any candidates on internships or employment from the program in 2021, but have one confirmed for 2022.

Ethnicity:

Telenor is a global group with a diverse workforce from many different countries. This is also reflected in Telenor Infra. The official company language is English although documentation is in "whatever language suits you best". We have non-Norwegian speaking employees and experiences few, if any, issues with this.

Our cafeterias in many cases also celebrate the national days of other countries by preparing dishes from those countries.

Please also see the section covering the Open Mind program under the heading Disabilities, as this program also targets immigrants with a background from non-EU countries.

Religion/beliefs:

We emphasize the availability of varied food in our cafeterias and have adapted the menu to employees with various religious affiliations. Employees at the headquarters at Fornebu have access to a prayer room. Telenor Infra also try to be sensitive around holidays outside the typical "Norwegian" holidays and the threshold is low for absence/vacation also outside the "typical" vacation weeks/months.

Sexual orientation, gender identity and gender expression:

Although a private matter Telenor Infra has members with different sexual orientation – also in prominent positions. We are also a sponsor of TechPride. Before the pandemic (2019), Telenor Infra participated in the Pride Parade under the Telenor-parole "We have room for all of you." Employees have been offered neckbands for access cards in rainbow colors. A network (Telenor Rainbow) has been established in Telenor for employees who define themselves as LGBT+, and they also have a group on the Work place intranet. Telenor Infra will work with other Telenor companies to mark Pride in 2022. Prominent members of our organization have been, or are, active in these networks, events and in other areas where more acceptance for different sexual orientation is discussed.

Pay and working conditions:

Telenor Infra has personnel policy guidelines and collective agreements that ensure equal treatment of employees, regardless of their background and the law regulated discriminatory grounds, for example in terms of wages and wage assessments. As mentioned above did Telenor Infra in 2021 propose to the unions a higher wage increase to the lowest paid part of the organization than the rest as part of the annual increment process. This to ensure less salary disparity and improved working conditions. Telenor Infra, alike the other Telenor-companies in Norway, have set procedures with the unions for wage negotiation as well as training for all manager on how to distribute the increases, including employees on parental leave and sick leave. All distributions are reviewed and approved by HR before implementation. The company has conducted wage negotiations with all four unions and in this connection has also provided managers with guidance on how to distribute wage settlements with an equal approach, including employees on parental leave and sick leave.

Telenor Infra conducts a health and safety risk review quarterly and organize a Health & Safety training for all employees semiannually. Health & Safety training for manager was cancelled in 2021 due to the pandemic but have been rearranged for 2022. All managers are required to attend either the full course (for first time manager) or the refresher course (for seasoned managers).

Telenor Infra pays full salary beyond 6G in the event of illness and in the event of parental leave. We also cover full pay for fathers on the two-week leave in connection with childbirth. Regarding parental leave, it is estimated that the provision of full pay during the leave may encourage more men to take the leave.

Promotion:

All vacancies are always advertised internally. Of 12 hires in 2021 9 came from within Telenor. Our policy is to have qualified candidates of both genders in the final round. This is followed up by the recruitment team, in collaboration with the hiring manager. The management groups have conducted annual People Forums where career development for employees is one of the issues. In this context, there is a focus on increasing positive attention and opportunities to women, particularly in technical disciplines.

Development opportunities:

All employees have created their own development plan in consultation with their manager. All employees are given 40 working hours in each calendar year for their own learning and development. This initiative is called the "40 -Hour Challenge." The vast majority of employees reports that they believe the development opportunities are the same for all employees, regardless of their background. There are also programs for development and advancement for employees, and the emphasis is, as much as possible, on gender balance among the participants. Telenor Infra ended 2021 with an average of 41 hours per employee.

Work-life balance /care responsibilities/parental and birth/adoption leave:

Telenor Infra implemented our model for increased flexibility of location of work in 2021. Employees can largely, within a framework, choose where they carry out their work. This has been implemented in close cooperation with and after discussions with union representatives. We see increased flexibility as a benefit that eases the combination of work with family life and care responsibilities, delivering and picking up children in kindergarten, etc. Telenor Infra has also piloted "permanent home office" for employees in particular need and/or where physical presence at an office location is a challenge – either due to disability, distance, or personal reasons.

During the pandemic Telenor Infra has maintained an extended quota for leave of absence with pay in the event of children's illness.

Telenor Infra has flexible work hours between 7am and 6pm, with core work hours between 9am and 3pm.

Facilitation:

During the pandemic and in 2021, an interdisciplinary working group has dealt with issues related to the pandemic. After discussions with union representatives, we offered to facilitate workplaces at home with loans of equipment from Telenor, offers to purchase cardboard desks to use as an adjustable height desk, offering an additional monitor, keyboard, mouse, headset, etc. Employees who have had serious health or welfare reasons necessitating continued work at the office during the pandemic have had this facilitated. The need for facilitation was discussed with the immediate manager, who assessed the necessary measures, possibly in consultation with HR and the occupational health service.

Throughout the pandemic, we have increased the number of mental health appointments and physical treatments covered through our health insurance.

Work against harassment, sexual harassment, and gender-based violence:

Telenor Infra has an own compliance function and whistleblowing procedures for negative incidents, including harassment in various forms. Incidents can be reported through our official Integrity Hotline, which all employees have easy access to. In 2021, no equality related cases were reported to the Integrity Hotline.

3.5 Measures planned in the year ahead:

As mentioned above is a pillar in Telenor Infra's People & Organization strategy to have sustainable employment practices. We will continue to emphasize our desire to be "livsløps"-employer, particularly in retaining and developing the older part of the work force.

Telenor Infra seeks to increase our share of women in technical discipline with an articulated company target of 16%. Despite being a low number, and hopefully overachieved, the efforts to get there is challenging – particularly in talent market where women in general is underrepresented.

Telenor Infra will continue to pursue candidates from the Open Mind program with one candidate confirmed for 2022 already.

Our recruiters will work on a project related to increasing diversity in recruitment, with emphasis on seeing opportunities and uncovering possible obstacles to diversity. In this context, we will also assess our job advertisements and their messaging regarding diversity, also based on criteria other than gender.

We will assess the areas where there are unexplained wage differences between men and women and consider the need for any measures in this context.

4 Assessment of results and expectations concerning the work ahead

There is still more to do when it comes to gender balance in Telenor Infra. On aggregated levels and on a company level Telenor Infra is performing well. Areas of improvement is assessed to be more localized within pockets of the organization and should be addressed closest to the issue as possible. We have a new People & Org. strategy in place where diversity, both mindset and demographically, are central elements.

Our failure to attract female applicants for engineering roles in 2021 is concerning and needs to be addressed throughout 2022. Both how we attract them, but also the experience we offer once onboard.

Although most of the wage disparities in chapter 1 are explainable and probably in accordance there are spaces where we see room for improvement. Telenor Infra believes they are best addressed through both collective measures and individual assessments.

The employee surveys show that the vast majority of employees believes that everyone has equal opportunities in the company, regardless of gender, nationality, age, physical health, personal background, or other causes of discrimination. Similarly, the vast majority of employees feels that they can 'be themselves' at work. Telenor Infra sees this as highly positive and it support the management impression of the organization. However, there is the potential for further improvements, and this will be followed up at various levels when the work on employee surveys and measures is done.

The company and its union representatives are satisfied with the work done on increased flexibility regarding work location. This will be followed up further in 2022. At the same time, we will assess whether increased flexibility and the possibility of working from home can potentially have negative effects on equality. Some studies have indicated that frequent working from home makes these employees less visible, for example when being assessed for possible promotion. It is important that this measure, intended as a benefit for employees and seen as a competitive advantage, does not have unintended negative consequences on gender equality and company culture. We will therefore continue to assess the need for any measures in this context.

Telenor Infra takes pride in being part of the larger Telenor Group and the opportunities that we have that we otherwise wouldn't been able to do on our own. Open Mind, the ODA-network, Girls Code, SHE, Pride, and many more are initiatives Telenor wholeheartedly supports and contribute to. We consider these as important measures in support of equality, not only in Telenor Infra and Telenor Group, but also at the societal level.

Although we consider the state of equality and inclusion in the company as a whole to be at a high level, with many positive activities and measures, we see the need for moving the needle further the coming year. This applies particularly to increased diversity within technical disciplines.

Fornebu, May 12th 2022
Board of Directors, Telenor Infra AS