

# Equality statement for Telenor Global Services AS for 2021

## Part 1: Equality statement

In Telenor Global Services AS, 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 gender equality in Telenor Global Services AS for the period January-December 2021 is presented in the following.

The figures below represent Telenor Global Services AS as an employer in Norway in compliance with Norwegian law requirements. When referring later in this report to findings in employee surveys please note that the questions are also answered by employees outside of Norway and the Norwegian entity.

### 1. Percentage of women and men in Telenor Global Services AS and at job levels, as well as gender pay differentials

	Gender ratio on different job groups		Pay differentials Women's share of men's salary as a percentage	
	Women	Men	Base salary	Total compensation (includes all taxable income)
<b>Total distribution of women vs. men in the company</b>	<b>28</b>	<b>31</b>	<b>85,4%</b>	<b>86,0%</b>
Telenor Management Arena (TMA)/CEO	-	1	n/a	n/a
Band A	1	2	n/a	n/a
Band B	6	11	105%	96%
Band C	11	15	94%	102%
Band D	7	2	n/a	n/a
Band E/F	3	-	n/a	n/a

## **1.1 Definition of employee categories**

We have discussed the definition of employee categories with our union representatives and have chosen a categorisation based on job level within the frame of the bands in Job architecture. The categorisations are based on several assessment factors, including the positions' responsibilities, impact, complexity and required experience. The job categories are defined across organisational departments.

In the following there is a more detailed description of which job categories are grouped in the different levels ("bands") in the model.

### **CEO**

The CEO (General Manager) is to be placed in a separate category as this position stands out with a special responsibility at a higher strategic level than the other managers in the company's management group, which is mainly part of Band A.

### **Band A**

This group includes senior management for a functional area/department within the company. The positions are defined as Senior Vice Presidents/CxOs. Decisions are guided by the company's strategic direction and ambitions. The management roles can be described as senior management roles (TMA-1) with responsibilities for establishing and implementing plans to achieve the company's overall strategies and ambitions, including responsible for goals, deliverables and results for own units/department. The roles are responsible for resources, policies and guidelines, as well as processes within their area of responsibility.

### **Band B**

This group includes middle management and expert roles responsible for a functional/operational area or a sub-area within a function. The roles in this group are mainly defined as Director roles. The roles contribute on the strategic/tactical and operational level by planning and implementation of strategic initiatives.

The expert roles at this level are senior positions that require specialised depth and/or scope of expertise in their own field. The roles interpret complex internal or external business problems and recommend solutions/best practices based on basic understanding and market insight.

### **Band C**

This group includes senior expert and specialist roles that have functional professional responsibility within areas of great impact. The expert roles are recognised as a position of senior expertise in one or more key functional areas where expertise is leveraged across Telenor's global organisation to achieve significant business impact.

The roles require depth and/or breadth of competence within own area. The roles contribute on the tactical level with the planning and implementation of strategic initiatives and/or recommend solutions/best practices for complex internal or external business problems.

### **Band D**

This group includes expert and specialist roles that have functional professional responsibility or partial responsibility. The roles require a level of specialised knowledge and experience in their

own field or broad competence in several related disciplines. The roles at this level are responsible for delivering and implementing action plans within their area of expertise.

### **Bands E and F**

This group includes specialists working at the operational level with the implementation of action plans, identification and solving problems and providing recommendations within their own field. The roles require a high level of knowledge and experience in their discipline.

## **1.2 Pay differentials, further explanation**

Women's share of men's compensation is 85,4 % in terms of average base salary and 86 % in terms of average total compensation.

The main reason for the pay differentials at the company level is that men are overrepresented in the higher position categories (band A-C), while women are overrepresented in the lower position categories (band D-F). But also, to a larger extent have positions with extras in addition to base salary, in particular car allowance.

When controlling for other variables such as tenure, age and job band, the differentials decrease significantly to about 4,4 % on base salary and approximately 2,2 % on total compensation. In addition, we apply individual pay setting practices, mainly outside wage systems that determine the specific salary levels. Therefore, justified reasons for pay differences may apply, such as performance, required competitive pay levels upon recruitment, etc.

Considering the findings in the pay gap analysis, we will assess possible measures to close the gaps. As an example, we will focus on increased recruitment of women to management positions and higher expert levels and will cooperate with the recruitment team in this context in 2022.

### **Pension**

Telenor Global Services AS offers a defined contribution plan with company contributions for pensionable earnings up to 12G (G is the national insurance basis amount) with individual investment selections. Telenor also has a closed defined benefit plan limited to pensionable earnings of 12G, the plan was closed for new entrants in 2006. All new hires since 2006 are enrolled in the defined contribution plan.

### 1.3 Temporary employees, parental leave, actual and involuntary part-time

The gender distribution has been mapped in terms of temporary employment, parental leave, actual part-time and involuntary part-time work. This is described in more detail in the following sections.

Total gender balance in the company Actual numbers		Temporary employees Percentage of all employees		Parental leave Average number of weeks		Actual part-time Percentage of all employees		Involuntary part-time Percentage of all employees	
Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
27	31	0,0%	0,0%	24	0	0,0%	0,0%	0,0%	0,0%

#### Parental leave

In 2021, 2 employees took statutory parental leaves (ref. Working Environment Act section 12-5). Men accounted for 0% of the parental leaves. Women accounted for 100% and took an average of 24 weeks in 2021. This may represent only part of the full leave period, as the average is calculated based on the number of weeks of parental leave taken within the calendar year of 2021.

As the regulation provides flexibility and choice regarding the division of the parental leave period between the parents, Telenor Global Services AS is focused on ensuring that men have equal opportunity, and also acceptance for taking parental leaves.

#### Sick leaves

The rate of sick leaves for Telenor Global Services AS employees in 2021 was 1,31%, compared with 2,01% in 2020. For women, the rate of sick leaves equates to 3,97% which is an increase from 1,41% in 2020. For men, sick leaves were 0,40%, an increase of 0,01% from 0,41% percentage points from 2020. The rate of sick leaves is highest in the age groups 50-59. Although there has been an increase of sick leave for women in 2021, we have a good overview on the reasons for this, and don't believe it is reason for particular measures in this regard outside following up like we normally do.

There is minimal recorded absence related to child or child carers illness. This is assumed to be related to the required home office during the Covid-19 pandemic and Telenor's Flexible Way of Work, which has allowed employees the ability to work, to some extent, despite illness of children or child carers.

#### Recruitment

In 2021, Telenor Global Services AS recruited 6 new employees, of whom 2 (33,33%) women.

#### Involuntary part-time work

Telenor Global Services AS has not had employees in part-time positions in 2021.

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

### 1. Principles, procedures and standards to promote equality and non-discrimination

Telenor Global Services AS is committed to Telenor Group's HR policies, where equality, anti-discrimination, diversity and inclusion are a vital part, including the Code of Conduct which states 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".*

All Telenor Global Services employees are required to conduct eLearning including dilemma training and sign-off on the Code of Conduct on an annual basis. This was also carried out in 2021. Violations of the Code of Conduct and other guidelines shall be reported to the immediate line manager or by using Telenor's integrity hotline.

In the autumn of 2021, 91% of Telenor Global Services AS employees said they feel they could report violations of the Code of Conduct if they were to observe any. 5% answered neutrally, while 4% answered they were not comfortable to report any observations.

Telenor Global Services AS follows Telenor's Group Manual for Diversity and Inclusion, People Policy and Telenor's whistleblowing procedures, which include the Integrity Hotline where violations of Telenor's guidelines can be reported anonymously, if desired. Incidents reported to the Integrity Hotline are followed up by the company's compliance function with necessary investigations and corrective measures. This applies to all negative/reprehensible incidents, including anything concerning equality. In 2021, no issues concerning equality or discrimination were raised.

In 2021, Telenor developed guidelines for flexibility, providing employees the opportunity to more frequently choose their location of work. This supports work-life balance and also supports employees with certain disabilities to reduce the amount of physically exhausting travel. These guidelines have been developed and implemented through Telenor's Flexible Way of Work project in collaboration with employees and Union representatives.

Telenor Global Services AS is bound by collective bargaining, collective agreements, and local agreements between Telenor Global Services AS and EL & IT Forbundet, NITO, Tekna and Negotia. The collective agreements also include provisions for equality and diversity. Telenor Global Services AS 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.

Telenor Global Services AS follows Telenor's diversity and inclusion requirements and the principles that are applicable to all business units, including the following:

- Ensuring that recruitment, selection, and promotion processes focuses on diversity
- Providing learning and development opportunities with the aim of raising awareness and offering practical guidance related to diversity and inclusion, so that all employees can actively help build a workplace that embraces diversity and inclusion
- Supporting and promoting internal networks and employee groups that aim to lift various under-represented groups and create a sense of belonging

## **2. This is how we work to identify risks of discrimination and barriers to equality**

### **2.1 Overall structure for the equality agenda**

Telenor Global Services AS's management teams and the union representatives are focused on complying with our internal policy documents, including the equality policy. Equality issues are mainly considered as an integrated subject in various meeting arenas between management and elected representatives, who regularly meet with an open agenda, both formally and informally, at various levels of the company. In 2021, an important area of dialogue has been the discussions with the unions concerning the introduction of increased work location flexibility, among other reasons to ensure work-life balance. There have not been any meetings where equality has been the sole topic. As a part of the discussions in the yearly salary negotiations with the unions we have agreed to continue focusing on equal pay for equal work through the year. On this background, we have had follow up meetings discussing this part of equality.

The Working Environment Committee (WEC) plays an important role in various topics related to health, safety and the environment. The WEC in Telenor Global Services AS has met four times in 2021 including some "workshops". Relevant topics that have been discussed in the WEC meetings in 2021 are:

- The COVID-19 pandemic and enabling good working conditions for employees in the workplace and in the home office
- Follow-up of employee surveys
- Sick leave rates
- Usage of occupational health services
- Flexible Way of Work
- HSE training for all employees by using the course People First as a mandatory training, and mandatory training for leaders

Telenor Group has a strategic goal of maintaining a rate of at least 40% women employed in the company in the period until 2023. At the senior management level, the goal is 35% women. Telenor Global Services has a 47,5 % share of women in the company and will continue to work to maintain a good gender balance. In the senior management we have 25 % women.

Diversity and inclusion are an integral part of the company's human resource strategy, and gender balance and equal pay are as already mentioned a topic for discussions with our unions.

Telenor has its own learning platform, Telenor Academy, with a considerable amount of training material covering gender equality, diversity and inclusion for employees and managers.

## 2.2 We discovered the following risks of discrimination and barriers to equality

Our employee engagement survey, Our Voice, is an important mapping tool for uncovering discrimination risk and barriers to equality. The survey is conducted globally each autumn. In addition, several smaller pulse surveys are carried out during the year. As earlier mentioned, our employee survey is sent to employees also situated and employed outside Norway, mainly in Asia. Because the survey is answered anonymously, it is not known how the findings are for Telenor Global Shared Services in Norway compared to the rest of the global TGS business, but the answers give however important signals of areas to work on, both in and outside of Norway.

In addition to the employee surveys, cooperation with the union representatives and WEC is very important to understand issues and challenges concerning the work environment, sick leave rates and any equality issues.

The latest employee survey was conducted in the autumn of 2021. Below are some examples showing how employees perceive the overall equality situation in the company:

- When employees are asked if they feel they can be themselves at work, 92% answer positively, 6% answer neutrally and 2% answer negatively.
- When employees are asked if they feel everyone has the same opportunities for development regardless of gender, nationality, age, physical ability, personal background or any other cause of discrimination, 80% answer positively, 12% answer neutrally and 8% answer negatively.
- When asked whether there is necessary flexibility to secure work-life balance, 92% answer positively, 4% answer neutrally and 4% answer negatively.
- When asked whether employees feel they can express their opinions without fear of negative reactions, 85% answer positively, 11% answer neutrally and 4% answer negatively.

Although the vast majority of employees respond positively or neutrally to these questions, it is important to identify the need for measures to make changes for those who answer negatively or even neutrally. When working on following up on the results from the survey we have to take a broader approach to include also the global part of the business. Further discussions and mapping of causes, as well as the implementation of relevant measures based on the survey results, is handled locally in each department and in addition each team have its own action plan.

In addition, we highlight the following risk factors for the state of equality in Telenor Global Services AS:

- There is a predominance of men in higher management and expert roles
- There is a predominance of women in the more operational and administrative positions
- There are too few women ready for promotion to higher management positions.
- There are historically former management employees who have not received a reduction in their compensation and benefits after a change from leader to expert

- Although most differences in compensation between women and men are due to explainable causes and decrease when controlling for age, period of service, unit affiliation and position level, there is still a small proportion of the pay differentials where the cause cannot be explained in a similar way
- 8 % of the employees answer negatively to the question regarding equal opportunity, and 12 % answer neutrally
- 4 % of the employees answer negatively to the question whether they can express their opinion without fear of negative reactions, and 11% answers neutrally

### **2.3 Possible causes of risks and hazards**

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

- The compensation disparities between women and men at company level are largely due to the predominance of men in the higher position levels
- There is a low proportion of women in the expert band B area, due to a historical predominance of experienced senior men with expert competence in our business area and a relatively low turnover.
- There is considerable competition in the market for qualified labour in several important areas of the company's business, particularly within technology.

### **2.4 We have initiated/implemented the following measures in 2021**

Telenor Global Services AS follows a structured process for people managers to follow up their teams through the year, called People Dialogue. This includes an established processes for appraisals, defining goals, and setting development plans for employees individually. The immediate manager is responsible for following up their team members, and this shall take place in accordance with the personnel policy without any form of discrimination.

#### **Gender**

8 March 2021, marked by posting posts about gender equality on our internal communication platform Workplace.

In 2021, the SHE index ranked Telenor's Norwegian companies in their top 3 companies with the best gender balance in the country.

Telenor hosted the SHE Conference 2021 at Fornebu and several employees from Telenor Global Services attended the conference.

Telenor Global Services AS has a total share of 47,5% women. In the senior management team, it is 1 woman out of 4, which gives 25% women. In total Telenor Global Services AS's has 12 leaders, 5 are women, which gives 41,7% women.

#### **Ethnicity**

At Telenor Global Services AS, there is a high level of ethnic diversity with employees of many different nationalities. This enriches the culture and helps create greater understanding and

interaction across Telenor Group's business units and in the markets in which we operate. We use English as the standard working language to prevent anyone from feeling left out due to language barriers. The use of English as our working language also makes it easier to include employees with different language and national backgrounds, and as such it lowers possible barriers.

In addition, we offer Norwegian lessons to all new employees who come from abroad as this also prevents the employees to feel left out of the social environment among colleagues and to simplify collaboration.

### **Disability**

Telenor Global Services AS participates in the Open Mind programme, which was initiated and is operated by Telenor Norway. The programme 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 Global Services has not had any candidates on internships or employment from the programme, but we are positive to resume collaborating with Open Mind going forward.

### **Religion/beliefs**

Amongst employees in Telenor Global Services AS, we find a diverse representation of religions and beliefs, and it is important for us to facilitate celebration of religious holidays. It is also important for us to prevent work events from colliding with our colleagues' religious holidays. In our canteens, we also emphasise offering a varied menu, adapted to employees with differing religious affiliations. Employees at the head office at Fornebu have access to a prayer room.

### **Sexual orientation, gender identity and gender expression**

All employees in Telenor Global Services AS should be able to work without experiencing discrimination based on sexual orientation, gender identity or gender expression. A separate internal network has been established for employees who define themselves as LGBT+ with relevant groups on the internal communications platform Workplace. Pride 2021 was marked with rainbow flags at our offices.

All employees in HR have been offered "Pink competence" training (regarding gender- and sexuality diversity) arranged by the organization FRI.

### **Further information on human resource areas:**

#### **Recruitment**

Telenor Global Services AS strives to be a diverse and inclusive workplace, and this is an important part of the HR strategy. In our recruitment processes, as far as possible the final rounds should have candidates of both genders. This is followed up by the recruitment team in collaboration with the recruiting manager. We also strive to ensure female leaders are present in interviews of female candidates. Our recruitment team is actively working to ensure that the company is visible in relevant arenas to attract younger, newly qualified talent to the company. When external recruitment partners are used, we ensure that they have the same focus on gender balance and diversity.

Vacancies in the company are first advertised internally. We have a global internal labour market, that give employees the opportunity to apply for positions across the company and across national borders. Telenor Global Services in addition posts all new positions at our own LinkedIn page.

With regards to disabilities, we will seek to continue our collaboration with the Open Mind program and are positive about internships from participants in the program, and possible recruitment if the company's needs and any candidates' qualifications are a good match.

### **Compensation and working conditions**

Telenor Global Services AS has personnel policy guidelines and collective agreements that ensure equal treatment of employees, regardless of background and statutory discriminatory grounds, for example in terms of compensation levels and salary reviews.

The company has conducted salary negotiations with all four unions and in this connection has also provided managers with guidance on how to distribute salary review budgets in an equitable way, including for employees on parental or sick leaves.

Telenor Global Services AS covers the full base salary and does not limit payments to 6G in the event of illness and parental leaves. We also cover full pay for fathers for the two weeks' leave in connection with the birth of their child. With regards to parental leaves, it is assumed that providing full pay during the leave may encourage more men to take parental leaves.

All employees and managers in the company are offered training regarding diversity and inclusion on our e-learning platform. Telenor Global Services AS offers regular health, safety, and environment (HSSE) courses for managers and for the Safety delegate.

### **Promotion**

The leadership teams conduct annual People Forums, where career development for team members is one of the topics. There is a focus on increasing the proportion of women being promoted, through defining specific development plans which are regularly followed up by the leader and the employee through the People Dialogue.

In addition, the company emphasises that everyone should have the same development opportunities regardless of gender, nationality, age, physical abilities, personal background, or any other basis for discrimination. This is measured annually in Telenor's Employee Engagement Survey – Our Voice. As a relatively high percentage of the employees answered either negatively or neutrally to the question on equal opportunity in 2021, it will be assessed possible measures to raise the percentage of employees answering positively to this question in 2022.

### **Opportunities for development**

Employees have outlined their own development plans in consultation with their manager. All employees are offered 40 working hours during the calendar year for their own learning and development. This initiative is called the 40 Hour Challenge. Most employees report that they believe the development opportunities are the same for all employees, regardless of their background, see however our comment in the last paragraph under "promotion". Employees are also offered various management development courses and expert programmes.

### **Possibility to combine work and family life/care tasks/parental leave/adoption leave**

In 2021, Telenor Global Services AS implemented Telenor's model for increased flexibility related to location of work. Employees can to a large degree within a certain framework, choose where they want to carry out their work. This has been developed in close cooperation and discussion with the unions. We consider increased flexibility as beneficial, helping ease the combination of work and family life, care responsibilities, getting children to and from kindergarten, as well as the ability for employees with chronic illness or disabilities to work.

During the pandemic, Telenor Global Services AS has also provided an extended quota for leave of absence with pay in the event of children's illness.

### **Facilitation**

An interdisciplinary working group was established in 2021 for handling issues related to the pandemic. After discussions with the unions, we offered to facilitate workplaces at home with loans of equipment from Telenor, offered to purchase cardboard desks to use as an adjustable height desk, offered 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, if needed in consultation with HR, WEC and the occupational health service.

During the pandemic we have increased the number of mental health appointments and physical treatments covered by our health insurance.

### **Work against harassment, sexual harassment, and gender-based violence**

Telenor Global Services AS has its own Compliance function and whistleblowing routines for reprehensible incidents, including for harassment in various forms. Incidents can be reported via the Integrity Hotline, available to all employees. The management has also had awareness and discussions around this area in the People Forums. In 2021, no such cases were reported to the Integrity Hotline.

## **2.5 Planned measures for the coming year**

In 2022, we will discuss with the unions, safety delegates and WEC the establishment of a yearly planning wheel for equality work, where the basis will be the four-step model for active equality work in section 26 of the Equality and Anti-Discrimination Act. The employee representatives and WEC will be involved in this work and participate in discussions about which fora are most appropriate for upcoming discussions and further work.

Telenor's Learning & Development department has developed an e-learning programme, Diversity & Inclusion Foundation, which is available to all managers and employees on our e-learning platform. This programme includes modules such as Recognising Discrimination, Unconscious Bias, Micro-aggressions and Diversity and Inclusion in the Workplace. HR in Telenor Global Services AS will encourage employees to complete this e-learning programme in 2022 as part of the previously mentioned 40-Hour Challenge.

Telenor Global Services AS is positive to the potential hiring of candidates from Telenor Open Mind and other external/public work training programmes.

We will continue our analyses of gender pay gaps, and where unexplained pay differentials between women and men are discovered, these will be addressed.

We will work together with the recruitment team on awareness in the recruiting process to promote equality and diversity, also on other areas than gender.

We will also review our policies and salary adjustment practices in the event of a decline in role levels due to restructuring, as well as for salary adjustments upon repatriation to previous or new positions after completion of international assignments. The objective will be to ensure that these rules do not contribute to further pay differentials between women and men in the company.

### **3. Assessment of results and expectations concerning further work on the agenda**

There is still more work to do when it comes to gender balance in some areas in the company. We currently have a total share of 47,5 % women, which is positive, but it is important to work to maintain this share. As a main explanation for gender pay differentials in the company are due to differences in where men and women work, this will be a focus area in a recruitment context.

We will continue to work actively to recruit women in the future, especially in expert and leadership positions at higher levels and in areas that have traditionally been male dominated. This also applies to recruitment of men in lower position levels.

In recent years, we have been working to develop our process for People Dialogue, and these conversations are an important tool for the further development of the company. The focus will be on ensuring that all employees have an active development plan that is continuously maintained and updated to help ensure the company's current and future needs for competence in the workforce. We also consider this an important measure for the improvement of gender balance in the company, by planning adaptive measures to further prepare and motivate women for leadership and advanced roles of expertise.

Employee surveys show that the vast majority of employees believe that everyone in the company has equal opportunities, regardless of gender, nationality, age, physical health, personal background or other possible causes of discrimination. Similarly, the vast majority of employees feel they can be themselves at work. Telenor Global Services AS sees this as positive but acknowledges that there is potential for further improvements to raise the percentage to answer positively to these questions. We will work to follow up in the various departments and teams when working on employee survey measures.

The company and the union representatives are satisfied with the work done related to increase work location flexibility. This work will continue 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 gender equality. Some studies have indicated that high frequency in working from home reduces employee visibility, for example when being assessed for a promotion. Therefore, it is an important part of our leaders' training in the Flexible Way of Work that working from home should not affect individual development and career opportunities in the company. 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 equality. We will therefore continue to assess the need for relevant measures.

Telenor Global Services AS will continue to cooperate with the Open Mind programme, for both people with disabilities and people with minority background. We consider the programme to be an important contribution toward equality, not only in the company, but also at the societal level.

Although we consider the state of equality in the company overall to be at a high level, with many positive activities and measures, we see that an even more systematic approach is needed for the work on the equality agenda. This particularly applies to mapping of risk factors and the implementation of targeted measures concerning all possible grounds of discrimination, and especially combinations of these grounds.

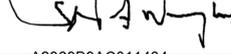
In 2022, the company will work even more systematically for equality. We will work actively with the unions and the WEC and safety delegates to make the necessary priorities and establish suitable meeting arenas. This has also been discussed with the unions, who will be actively included in further work.

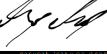
Fornebu, 08.04.2022

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