

Equality statement for Telenor Norway for 2021

Part 1 Equality statement

In Telenor Norway 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 equality in Telenor Norway AS for the period January-December 2021 is presented here.

1 Distribution of women and men by company and at position levels, and gender pay differentials:

	Gender representation at different position levels number of employees		Pay differentials women's share of men's salary as a percentage	
	Women	Men	Base salary	Total compensation includes all taxable income
Total distribution women vs men in the company	980	2309	90%	87%
Band A + TMA	8	45	119%	130%
Band B	55	182	103%	102%
Band C	225	719	99%	95%
Band D	239	682	97%	93%
Band E	187	330	95%	88%
Band F	266	351	104%	100%

1.1 Definition of employee categories

We have discussed the definition of employee categories with our unions. For this task we have used Job Architecture, our implemented model for identifying job levels. The job levels are defined across organizational units. This architecture shall, among other things, identify possible carrier paths for employees. The categorization is based on several assessment factors, including the positions' responsibilities, impact, complexity and required experience.

A measure in 2022, will be further quality assurance of the data used to determine placement in the various bands, along with a more detailed assessment of potential changes to groupings, due to considerations regarding the comparisons particularly of work of equal value and competence requirements.

The model is designed with positions placed in three categories (managers, experts, specialists) and then in different groupings (bands). Following are more detailed examples of which job categories are grouped into "bands" in the model we have used.

Band A

In this group we have management and expert roles at the upper levels of the company. Management on the top level (Telenor Management Arena – TMA) are grouped together with Band A to include the company's top management in the analysis without having groups that are too small to present findings.

In general, the other management roles can be described as typical senior management roles (CXO-1) responsible for deliverables and results in strategic functional areas across the organization. Decisions are guided by strategic direction and ambition. Examples include Sales Director, Marketing and Product Director and Unit Manager.

The expert roles are recognized as having expertise in more than one functional area (recognized throughout the industry), leveraging that expertise across the organization to provide significant business impact. They proactively follow up on market knowledge and customers to anticipate and proactively solve internal and/or external business challenges or regulatory issues. Examples include Head of Architecture, Investment Architect, Risk and Compliance Manager and Chief Intelligence Officer.

Band B

The management roles can be described as typical senior management roles (CXO-1 to CXO-2) with responsibilities for deliverables and results within their own functional areas. They are responsible for resources, policy and guidelines, as well as processes within their own area. Examples include Department Managers, Regional Managers and Sales Managers.

The expert roles at this level require specialized depth and/or breadth of expertise in their field. They interpret internal or external business problems and recommend solutions/best practices based on their basic understanding of general market insights. Examples include Project Managers, Advisors, Senior Engineers and Domain Architects.

Band C

The leadership roles at this level are typical middle level managers (CXO-2), responsible for delivering on the functional strategy laid out by senior management (CXO-1). They adapt department/unit plans and priorities to meet resource and operational challenges, thereby supporting productive change and implementation of company strategy within their domain. Examples include Billing Manager, Head of Sales, Section Manager and Head of Operational Support.

The expert roles require in-depth knowledge and experience together with an understanding of the immediate operational context and existing goals. Roles at this level are responsible for delivering and implementing the functional strategy as set by senior management. They solve complex problems, take new perspectives, see patterns or analogies in existing solutions and support productive change. Examples include Business Controller, Developer, Forecast manager and Senior System Administrator.

Band D

The management roles here are typical junior management (CXO-3), responsible for delivering on action plans laid out in cooperation with middle management (CXO-2). They set team direction and priorities, ensure tasks are completed and coordinate work activities with other supervisors. Examples include Team Manager, Team Leader, Strategic Project Manager and Technical Support Manager.

The expert roles at this level are responsible for delivering and implementing action plans determined in cooperation with middle management. These roles require a high level of knowledge and experience in their fields, with an understanding of the immediate operating context. Examples include Commercial Manager, System Expert, Key Account Manager, Service Manager, Technical Expert and Network Planner.

Band E

The management roles at this level are responsible for implementing action plans laid out by the sub-management (CXO-3). Decisions are governed by policies, procedures and business plans. They receive guidance and supervision from their managers, who expect them to complete assigned and specific tasks. Examples include Group Manager and Team Manager.

Specialists at this level have developed their knowledge and have experience in their fields. They are continuing to acquire more advanced knowledge and skills. They identify a range of problems and all relevant issues involved in basic situations, they analyze possible solutions using standard procedures and make decisions accordingly. Examples include Junior Engineer, Engineer, Customer Advisor, Data Analyst, Salesperson, Data Consultant and Content Developer.

Band F

Management roles at this level are governed by policies, procedures and business plans. They are guided and supervised closely by their manager, who expects them to complete assigned tasks and implement established action plans. We have no managers at this level in the company.

Specialists at this level solve basic challenges for clients in their own area and communicate with other departments according to established procedures. They solve issues involved in basic situations and make routine recommendations. Examples include Customer Consultant, Customer Advisor, Radio Operator, Logistics Operator, Technician and Sales Support.

1.2 Pay differentials, further explanation

At company level, women's share of men's salary is 90% in terms of average basic salary and 87% in terms of average total compensation. The main driver of the pay differentials at company level in terms of average base salary is the overrepresentation of men in the higher position categories, while women are overrepresented in the lower position categories. Among managers, 27.6% are women.

The main reason why the differences increase between women and men regarding total compensation is that, to a greater extent, men have positions that involve additional extras beyond basic pay (e.g., car allowances, stand by duty outside the workplace and shift allowance), as well as working more overtime. Considering that the differences appear to be related to men and women being occupied in different professions, particular attention is paid to this in a recruitment context.

Furthermore, there are more women who have been on long-term sick leave more than one year in 2021, and thus have received benefits from the Norwegian Labour and Welfare Administration (NAV) and not salary from the company, which makes a difference in total compensation. Age and seniority drive pay differentials to a limited extent.

When controlling for other variables such as division affiliation, unit, department, job category and job title, the pay differences decrease significantly, to about 3% on base salary and about 5% on total compensation. In addition, we apply individual pay setting practices, mainly outside compensation systems, that determine the specific salary levels. Therefore, justified reasons for pay differences apply, such as performance, required competitive pay levels upon recruitment, etc. Furthermore, we cannot rule out that there may be individuals who are misplaced in bands based on position complexity. We will take a closer look at this in 2022 and make necessary adjustments.

The bands that have pay differences of significance are mainly bands A, C, D and E.

In band A, the greatest impact on women's share of men's pay is that there are few women represented in the band, and that women in senior management are included.

In bands C and D, there are minor gender differences regarding base salary, but somewhat greater in total compensation. This is to a limited extent due to differences regarding where women and men work, age or seniority, and is mainly explained by overtime, unpaid leave and long-term sick leave.

In band E, the differences regarding both basic and total compensation are caused by the different occupations of women and men, and especially the fact that significantly more men work in technical categories, while women to a greater extent work in market/customer-related occupations, such as customer service. Here, compensation levels are mainly different based on market factors. The differences in total compensation are mainly due to men working more overtime, that they to a greater extent have positions that provide stand by allowances and shift work, and that women have a higher rate of long-term sick leave.

Pension

Telenor Norway 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, 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 number of employees		Temporary employees % of all employees		Parental leave average number of weeks taken		Actual part time % of all employees		Involuntary part time % of all employees	
Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
980	2309	0.3	0.7	18.1	12.7	2	3.4	0.24	0.5

Parental leaves

In 2021, 132 employees took statutory parental leave (ref. Working Environment Act section 12-5). Men accounted for 60.6% of the parental leaves in the calendar year 2021 and took an average of 12.7 weeks. Women accounted for 39.4% of the parental leaves and took an average of 18.1 weeks in 2021. Please note that this may constitute only part of the leave, as average figures relate only to weeks taken in the calendar year 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 ASA is focused on ensuring that men have equal opportunity, and also acceptance for taking parental leaves.

1.4 Sick leaves and recruitment

Sick leaves

The rate of sick leaves was 3.1% in 2021, compared with 2.9% in 2020. For women, the rate of sick leave equates to 4.8%, which is a reduction from 5.7% in 2020. For men, sick leaves were the same as the last year, 2.4%. Sick leave rates have been stable at approximately 3% in recent years. Sick leave rates are somewhat higher among the younger age groups in the company. Absence related to illness of children and childcare providers shows the following distribution for 2021: women at 35.6% and men at 64.4%.

Recruitment

In 2021, Telenor Norway recruited 244 employees, 68 (27.8%) of whom were women. This is a lower than desired rate, when seen in connection with the company's clear objective of increasing the proportion of women. However, it must be noted that a significant part of Telenor Norway's recruitment in 2021 has been to areas that require various types of technical education, and where there is traditionally a significantly lower number of women who have the required education. This applies, for example, to positions within IT, security and 5G. This presumably affects the gender balance of the pool of applicants and of those hired.

1.5 Further information on involuntary part-time work:

When it comes to mapping involuntary part-time work, we have conducted an employee survey among all our actual part-time employees as of 31.12.2021. The content of the survey was discussed in advance with the unions, who provided input. Of our part-time employees, 69% work in customer service areas (Customer Service and Customer Operations). In total 68% of the part-time employees completed the survey. The survey shows that one in five part-time employees wishes to work more and is available to do so. These mainly work in Customer Service. According to the survey, the reasons why four out of five part-time employees are satisfied with their work percentage are mainly; that they are students, that they want time to pursue other interests, or that they have health challenges that prevent a higher work percentage. Almost everyone who would like a higher percentage of work desires a full-time position, and the vast majority has raised this with their immediate manager.

Telenor Norway is aware that there are regularly part-time employees who would like a higher percentage of work. This is followed up on an ongoing basis, and the management makes assessments of whether operational considerations allow an increase in the work percentage where this is desired by the employee. In many cases, this is possible. However, customer service relies on some flexibility in terms of volume and opening hours, as well as evening and weekend work, and therefore there must be a certain proportion of part-time positions based on business needs.

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

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

Telenor Norway 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 Norway conducts mandatory annual training in the understanding of the Code of Conduct, including dilemma training for all employees. This was also carried out in 2021. 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 autumn of 2021, 90% of Telenor Norway employees said that they feel they could report violations of the Code of Conduct if they were to observe any. 6% answered neutrally, while 4% answered negatively.

Telenor Norway is also covered by Telenor's Group Manual for Diversity and Inclusion and People Policy, where diversity and inclusion have been a priority in 2021. Telenor Norway 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.

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 Norway's "Smidig dag" (Flexible Day) project, which has emphasized the involvement of employees and union representatives.

Telenor Norway is bound by collective bargaining, collective agreements and special agreements between Telenor Norway and the EL and IT Federation, NITO, Tekna and Negotia. The collective agreements also include provisions for equality and diversity. Telenor Norway 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.

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

2.1 Overall structure for the equality agenda

Telenor Norway's management and union representatives are focused on complying with our internal policy documents, including equality policy, which is an integral part of our People Strategy.

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, at various levels of the company. 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. There have been few meetings where equality has been the sole topic. Nevertheless, the equality perspective is sought integrated into all such activities, including in the conversations with the union representatives, who are important partners in all parts of the four-step model in the company.

The Working Environment Committee (WEC) plays an important role in various topics related to health, safety and the environment. WEC has met three 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, use of the occupational health services and work location flexibility.

Telenor Norway has a Diversity & Inclusion Manager in HR, who also meets in a separate cross-organizational forum in the group. In this forum, the companies share best practices on equality related issues.

Telenor has an 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 Norway has a strategic goal of increasing the share of women in the company to 40% by 2023. At management level, the target is 35% women in senior management.

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

Our Employee Engagement Survey (EES) is an important mapping tool for uncovering discrimination risk and the barriers to equality.

The main survey is done with all employees every autumn. In addition, several smaller pulse surveys are carried out during the year. Also, cooperation with the union representatives and WEC is very important for understanding issues and challenges concerning the working environment, sickness absence and any equality issues.

The previous EES was conducted in the autumn of 2021. Following are some examples of results showing how employees perceive the overall equal opportunity situation in Telenor Norway:

The survey shows that 94% of employees feel they can 'be themselves' at work, 3% answer this question neutrally and 3% answer this question negatively. 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, 88% answer positively, 8% neutrally and 4% negatively.

When asked if there is the necessary flexibility to ensure work-life balance, 88% of employees answer positively, 6% neutrally and 6% negatively. When asked if employees feel they can express their opinions without fear of negative reactions, 88% answer yes, 6% answer neutrally and 6% answer negatively.

Although the vast majority of employees responds positively or neutrally to such questions, it is important to identify the need for any measures to make changes for those who answer negatively. 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, mapped salary differences between men and women, and has investigated whether there is involuntary part-time work (see section 1 of the report).

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

- There is generally a relatively large gender imbalance in the company, with a predominance of men at all levels, and the greatest imbalance in our technical environments
- Recruitment figures for 2021 show a predominance of male appointments
- There is an under-representation of women in the higher position categories, and an over-representation in the lower position categories
- Although most differences in compensation between men and women are due to explainable causes and decrease when controlling for age, tenure, 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
- There is higher sickness absence among women than among men

2.3 Possible causes of risks and hazards

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

- The compensation disparities between men and women at the company level are largely due to the predominance of men in the company's top positions and in technical environments

- In general, there is considerable competition for qualified labour within Telenor Norway's domain, and there are significantly fewer women than men who have an education in technology and are applying for jobs in technological areas
- On average, men work more overtime than women
- Men are more likely to have roles that include extras (e.g. car allowance, shift allowance).
- The gender imbalance that exists in the company may make it more difficult both to recruit and to retain female employees

2.4 We have initiated/implemented the following measures in 2021

Initially, Telenor Norway 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 Norway is a partner for the SHE programme and has in 2021 had a female manager as a participant in the programme, which focuses on increasing the number of women in senior management. Telenor Norway has also had a female participant in Crown Prince Haakon's leadership programme for young managers.

Telenor Norway's top management has 45% women. Telenor Norway also has a long-term incentive plan that focuses on (young) female leaders and experts, where four out of five participants in 2021 were women.

Telenor Norway marked International Women's Day on the 8th of March on our intranet. Our female technology director presented at the LØRN.TECH conference on women in Technology in connection with Women's Day, and Telenor Norway organized an event where our female Head of Business participated together with Abelia, the ODA network and NHH, among others.

Telenor is a partner with Plan International for their Girls Create Tech Academy initiative, where girls in the 9th grade can explore technology together with Telenor mentors.

In 2021, Telenor's companies in Norway were ranked on the SHE index as the third best in the country for gender balance.

Disabilities

In 2021, we have continued our work training programme, Open Mind. The programme was started in 1996 and is carried out in collaboration with NAV to support the inclusion of groups that stand outside of the labour market. The programme runs for one year and entails, among other things, that participants intern in different parts of the company. This is an important contribution to strengthening our culture of inclusion. In 2021, 15 people participated in the programme. The programme has two target groups: People with disabilities and people with an immigrant background from countries outside the EU. In 2021, 11 people from the programme were hired, three in Telenor and eight externally.

We have several employees with mobility challenges, and we have emphasized universal design for renovations of our own premises during the pandemic. Our model for flexible way of work, regarding where employees can perform their work, is considered an advantage for employees with disabilities and can contribute positively to increasing their proportion in the company, while facilitating the work of our existing employees with disabilities.

Ethnicity

Telenor is a global group with a diverse workforce from many different countries. This is also reflected in Telenor Norway. Although the working language of the company is Norwegian, employees are used to collaborating in English with colleagues who do not speak and/or write Norwegian. Personnel policy documents and other information are usually prepared in both languages, which is seen as positive for an inclusive culture. 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 programme under the heading Disabilities, as this programme 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 Norway facilitates the celebration of religious holidays.

Sexual orientation, gender identity and gender expression

We celebrated Pride on our intranet with a greeting from our CEO and raised the rainbow flag in our offices. Before the pandemic (2019), Telenor Norway also participated in the Pride Parade under the parole "We have room for all of you." Employees have been offered neckbands for access cards in rainbow colours. A network (Telenor Rainbow) has been established in Telenor for employees who define themselves as LGBT+, and they also have a group on the Workplace intranet. Telenor Norway will work with other Telenor companies to mark Pride in 2022.

All HR employees at Telenor Norway have also carried out training on the topic of gender and sexuality diversity held by the FRI association, and the training has raised awareness of this kind of discrimination.

Further information on human resource areas:

Recruitment

Telenor Norway strives to be a diverse and inclusive workplace, and this is an important part of the HR strategy.

Telenor Norway has had several hiring campaigns in 2021, including within security and IT. In the advertisements we have worked actively with the use of images and inclusive language to appeal for applications from people of varied backgrounds. In our recruitment processes, if possible, candidates of both genders must be included in the final rounds. We also facilitate the participation of female managers in interviews with female candidates. When external recruitment partners are used, we ensure that they have the same focus on gender balance and diversity.

Telenor Norway has over a period of time cooperated with the ADA project for civil engineers in NTNU with a focus on recruiting more women to technology in general, and TO Telenor in particular. The collaboration has included seminars and meetings with the network's members, to reach out to a large number of women and encourage them to apply for jobs in technical areas. The pandemic has resulted in fewer opportunities for activity in 2021, but Telenor Norway is positive toward continuing these types of cooperation in the future.

In 2021, we recruited students for summer employment, and these were 56% men and 44% women. In recruitment, great emphasis was placed on gender balance and on ethnic diversity.

For the recruitment of managers in 2021, we saw a 30% share of women.

Compensation and working conditions

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

Telenor Norway regularly organize Health and safety courses for managers. In 2021, three such courses were held, with 45 managers participating.

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.

In connection with the gender pay analysis for 2021, Telenor Norway has worked closely with Telenor's research group, Telenor Research. They have provided assistance in the gender pay gap analysis conducted, as well as for the survey on involuntary part-time work.

Telenor Norway pay 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.

The company's HR has in 2021 prepared a training programme for managers regarding diversity and inclusion, with an emphasis on understanding unconscious bias. This has been piloted in one of our divisions for the management team and will be further developed in 2022.

Promotion

All vacancies are always first advertised internally. 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 recruiting 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 the proportion of women who are promoted.

Opportunities for development

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 programmes for development and advancement for employees, and the emphasis is, as much as possible, on gender balance among the participants. However, gender is not currently tracked for participants.

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

Telenor Norway implemented Telenor's 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.

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

Telenor Norway 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 Norway 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.

2.5 Planned measures for the coming year

In 2022, there will be particular focus on establishing an annual planning wheel for equality work, and the four-step model will be integrated further. The union representatives and AMU will be involved in this work and participate in discussions concerning appropriate forums for future discussions and work.

Telenor Norway will work on further development of courses on diversity and inclusion for managers. This will also be discussed with the union representatives.

Telenor Norway will also continue the Open Mind programme for both of the target groups in 2022.

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 pay differentials between men and women and consider the need for any measures in this context.

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

There is still more to do when it comes to gender balance in the company. In 2021, 27.8% of the company's newly recruited employees were women, and we consider this to be lower than desired. Therefore, we will continue with active efforts to increase future recruitment of women. In this context, we wish to develop existing and new collaborative arenas, including with campuses for technical education, for example within IT. Recruitment of summer internship candidates will be part of this, with continued emphasis on gender balance in recruitment, as well as a focus on diversity in general.

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 Norway sees this as highly positive. 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 therefore an important part of our training for managers, to make sure that working from home does not affect an individual's 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 gender equality. We will therefore continue to assess the need for any measures in this context.

Telenor Norway will continue with the Open Mind programme, both for people with disabilities and for people with minority backgrounds. We consider this an important measure in support of equality, not only in the company, but also at the societal level.

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

In 2022, the company will work more systematically on equality issues. We will work actively with the union representatives and with the WEC and the safety delegates to make necessary priorities and establish suitable meeting places. This has also been discussed with the union representatives, who will be actively included in the work ahead.

Fornebu, March 18th 2022
Board of Directors, Telenor Norway AS