SASB Report
2022

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Topic	CODE	METRIC	Telenor's response
Environmental Footprint of Operations	TC-TL-130a.1	1) Total energy consumed	10 047 600 GJ. Equal to 2 791 GWh of energy.
		2) Percentage grid electricity	86%. A total of 2 398 GWh has been sourced through the grid.
		3) Percentage renewable	27%. Telenor Group has sourced 733GWh of renewable electricity through national electricity grids. Renewable electricity has been purchased in our Nordic operations via Guarantee of Origin Certificates and in Thailand via IRECs. A remaining 19GWh of renewable electricity has been generated mostly via solar off-grid sites.
Data Privacy	TC-TL-220a.1	Description of policies and practices relating to behavioural advertising and customer privacy	Telenor Group Privacy governance is part of our commitment to Responsible Business. A description can be found on our corporate website at https://www.telenor.com/sustainability/responsible-business/privacy-governance/ Telenor is a diverse group of companies, operating in different markets across Europe and Asia. Each Telenor company is its own data controller and disclose their privacy practices on the respective company's website as part of their privacy statement.
	TC-TL-220a.2	Number of customers whose information is used for secondary purposes	Telenor Group companies may only use customer data for defined and lawful purposes in accordance with current legislation and our internal Group Privacy Policy. Any further use of customer data for secondary purposes may happen in anonymised form, only. A description of our privacy governance structure and the role of our Group Privacy Policy can be found on our corporate website at Privacy governance in Telenor - Telenor Group.
	TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	0
	TC-TL-220a.4	1) Number of law enforcement requests for customer information 2) Number of customers whose information was requested 3) Percentage resulting in disclosure	Telenor Annual Authority Requests Disclosure report is available here: Telenor-Annual-Authority-Request-Disclosure-Report-2022.pdf
Data Security	TC-TL-230a.1	1) Number of data breaches 2) Percentage involving personally identifiable information (PII),	Telenor Group do not report this indicator as details around data breaches are confidential. As a global connectivity provider, Telenor Group is at constant exposure to cyber threats, which we work to identify,

		3) Number of customers affected	detect and mitigate. While we are constantly increasing our efforts to actively protect our networks, products and customer data, advanced threat actors are increasingly aiming to steal information, modify customer data or make our services unavailable. Specific details associated with security incidents are subject to national laws and regulation and confidential, as to not compromise the integrity of ongoing and future investigations. For more information on Telenor's commitment to cyber security, refer to Telenor's Cyber Security page.
	TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Telenor Group is managing security risk according to the ISO/IEC 27001 security standard, by global monitoring of the threat landscape used through predicative analysis to dynamically define implementation of proactive security capabilities such as preventative controls, access control, vulnerability management, detective control covering monitoring by Security Operation Centers and reactive controls to swiftly respond to challenges through incident management processes, recovering through disaster recovery and crisis management structures. Hence, we reduce the unwanted effect of incidents. Read more on how we work with cyber security on Telenor.com and our public position on cyber security. We also refer to our Sustainability Report for further description in the chapters: 'Cyber security' and 'Reporting frameworks and verification'.
Product End-of-Life Management	TC-TL-440a.1	1) Materials recovered through take back programmes	486 200 devices. Telenor Group reports on number of devices instead of tonnes, as recommended by GSMA on the sector specific metrics for waste reduction and circularity. Telenor Group reports the number of devices returned through take back programmes in the Nordic business units and dtac. These consist of mobile devices, such as smartphones and fixed CPE devices, such as TV boxes and broadband routers. A total of 172 108 mobile devices and a total of 314 092 fixed devices were returned through take-back programmes.
		2) Percentage recovered materials reused	68 % of returned devices (74% of returned mobile devices and 65% of returned fixed devices).
		3) Percentage recovered materials recycled	32% of returned devices (26% of returned mobile devices and 65% of returned fixed devices).
		4) Percentage recovered materials landfilled	0%

Competitive Behaviour and Open Internet	TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations	On 29 June 2020, ESA issued a decision against Telenor Norway and Telenor ASA with a fine of NOK 1.2 billion for abuse of dominant position in Norway. The investigation covered several issues, but the final decision only concerns the alleged insufficient margins between Telenor's wholesale prices and prices for mobile broadband to residential customers when sold on a stand-alone basis between 2008 and 2012. The case rests on a number of legal, economic, and factual considerations, on which ESA and Telenor have different opinions. Telenor appealed the decision to the EFTA Court on 28 August 2020. On 5 May 2022, the EFTA Court rejected Telenor's appeal and the case is thereby final and closed. The fine was paid in third quarter 2020.
	TC-TL-520a.2	Average sustained download speed of 1) owned and commercially-associated content and 2) non-associated content	16 Mbps average DL throughput per user. Mobile network 4G. Telenor does not differentiate between owned, commercial and non-associated content. The source of the average download speed is based on measurement directly from the radio end/equipment and is the average download speed per user for the whole reporting period. The reported figure is the average of the Business Units.
	TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating and related practices	Legislation on net neutrality, paid peering, zero rating and related practices vary according to the markets where we operate. Telenor Group complies with the applicable legislations in each and every one of them. The preliminary ruling of the European Court of Justice in September 2021 and the subsequent guidelines from The Body of European Regulators for Electronic Communications (BEREC) in June 2022 eliminated the possibility for Telenor Group's European business units to provide zero-rated tariffs. The implementation of this ruling has been completed or is in progress in accordance with the timeline set by national regulators.

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Managing Systemic Risks from Technology Disruptions	TC-TL-550a.1	1) System average interruption frequency 2) Customer average interruption duration	Telenor Group is not reporting this indicator as there is no Groupwide definition of how to measure this. Our approach to managing systemic risks includes both preventive and corrective actions to avoid major service interruptions and to limit impact to our customers. The Telenor Risk management policy ensures that risks in Telenor are identified, assessed, and treated in a way that supports Telenor in achieving our ambitions and goals. The Telenor policy framework ensures that Telenor Group is compliant to regulations including security and privacy, enabled through technology design and solutions including guidelines on improving operations.
	TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	The main business continuity risks associated with technology are technical failures, cyber-attacks, or weather events. The main measures applied to mitigate Business continuity risks from the three main areas include: • Regular assessment and measurement on service operations according to the Telenor Technology Operation manual, including Internal Audits. • Implementing security capabilities to prevent and reduce the effect of a range of threats to protect the confidentiality, integrity of customer data and internal business information and the availability of services. • Yearly benchmarking process level against international best practices and capabilities for monitoring and detection. To support incident management and response is measured and developed through Security Operations Center – Capability Maturity Model (SOC-CMM) across Telenor business units to mitigate threats. • Through the Touch Free Operation ambition Telenor Group drives a continuous improvement process to increase automation, operating quality and to better support business and improve customer experience. In the event of major incidents the Group Manual Crisis management, as well as Crisis management plan (CMP) & processes is followed. The CMP is updated on a yearly basis. We also refer to our [Annual Report](#) for supplementary information in the Risk Overview chapter.

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Activity Metrics	TC-TL-000.A	Number of wireless subscribers	158 million.
	TC-TL-000.B	Number of wireline subscribers	0.2 million. Nordic only.
	TC-TL-000.C	Number of broadband subscribers	2.2 million. Nordic only. Including Fixed wireless access subscribers.
	TC-TL-000.D	Network traffic (Petabyte)	13 967 PB. Mobile network only.

The SASB report and figures have been in scope for limited assurance aligned with the Sustainability Report. The independent auditor's assurance report is published here.

Reporting Boundaries

The scope of the SASB report follows the Group reporting structure for year-end 2022, which excludes Digi and includes dtac, however during the first quarter of 2023 dtac has been deconsolidated.

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