



telenor
group

GRI INDEX REPORT 2021



Telenor Group Report 2021

GRI Sustainability Reporting Standards

'In accordance – Core'



Preface

Telenor Group supports the Global Reporting Initiative (GRI) – as an Organisational Stakeholder – and its initiatives to drive sustainability reporting. Telenor Group reports – and has done so since 2002 – in accordance with the GRI Sustainability Reporting Guidelines. The 2021 report applies the GRI Sustainability Reporting Standards.

This report has been prepared in accordance with the GRI Standards' Core option, with an in-depth and targeted reporting on the most material topics to Telenor. Scope of the reporting is Telenor ASA and all Telenor's subsidiaries directly controlled by Telenor ASA ("business units").

In 2021, Telenor Group carried out an updated assessment of its material topics guided by the principles of double materiality, as defined in the published aspects of the European Financial Reporting Advisory Group's (EFRAG) framework, the European Sustainability Reporting Standards (ESRS) working papers, as well as the frameworks of the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB). The assessment was aligned with the GRI Sustainability Reporting Standards and was conducted in accordance with the GRI 101 Foundation principles for defining report content through the following key steps: identification, prioritisation, and validation. The materiality process is regularly revised through internal workshops and meetings within Telenor to adapt for changes in context, risk, and stakeholder feedback. More details on the materiality assessment process can be found [here](#).

The content provided in the report is to the best of our knowledge the most correct information available.

External Assurance

An independent [assurance](#) of the content of the Sustainability report 2021 has been done by DNV Business Assurance.

References in the column UN Global Compact

Principle 1-10: UN Global Compact Advanced Communication on Progress (COP)

SDG 1-17: Sustainable Development Goals

TELENOR GRI INDEX REPORT 2021

GRI standard	Standard disclosure	Telenor response	UN Global Compact
GRI 101 Foundation 2016	GRI 101 does not include any disclosures		
GRI 102 General Disclosures 2016			
1. ORGANIZATIONAL PROFILE			
102-1	Name of the organization	Telenor Group	
102-2	Activities, brands, products, and services	https://www.telenor.com/about/our-companies/	
102-3	Location of headquarters	Fornebu, Norway	
102-4	Location of operations	Telenor Annual Report 2021 -p.94 and https://www.telenor.com/about/our-companies/	
102-5	Ownership and legal form	Articles of Association	
102-6	Markets served	Telenor Annual Report 2021 -p.94 and https://www.telenor.com/about/our-companies/	
102-7	Scale of the organization	Telenor Annual Report 2021 – p.13 – 14 and p. 94	
102-8	Information on employees and other workers	Telenor Annual Report 2021 p. 56/58 Key ESG Figures	
102-9	Supply chain	Telenor Annual Report 2021 p. 62/63 and also outlined online: Supply Chain Sustainability	
102-10	Significant changes to the organization and its supply chain	Telenor Annual Report 2021 -p.11, 94 and 119/120	
102-11	Precautionary Principle or approach	Telenor Annual Report 2021 - Note 29; p.132; Financial risk management Telenor Code of Conduct	
102-12	External initiatives	The most important social charters, principles, or other initiatives to which Telenor subscribes or endorses can be found here: Telenor Annual Report 2021 p. 35 (Key standards followed) and p. 41 (Stakeholder Engagement) Reporting our performance	
102-13	Membership of associations	<ul style="list-style-type: none"> • GSMA (Global Mobile Operators' Association) • Joint Audit Committee (JAC) • United Nations Global Compact (UNGC) • Confederation of Norwegian Enterprise (NHO) • Child Labour Platform (CLP) • Nordic business Forum • UNI Global Union <p>Additional info: Telenor Annual Report 2021 p. 41 (Stakeholder Engagement)</p>	
2. STRATEGY			
102-14	Statement from senior decision-maker	Statement from CEO	
3. ETHICS AND INTEGRITY			
102-16	Values, principles, standards, and norms of behavior	Telenor has zero tolerance of corruption. Telenor's ethical standards promote proper business practices and reflect relevant laws,	Principle 10 SDG 16

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		<p>regulations, and internationally recognised standards.</p> <p>Integrity is a vital part of Telenor’s business. Telenor’s management is committed to sending clear, unambiguous, and regular messages to all staff and business partners that corruption and bribery are unacceptable. Telenor’s governing documents set one single standard which shall govern all business activities, regardless of where such activities take place.</p> <p>Telenor Code of Conduct Telenor ethics and anti-corruption programme Anti-corruption</p>	
102-17	Mechanisms for advice and concerns about ethics	<p>To encourage individuals such as employees, suppliers, and other stakeholders to voice their concerns, Telenor has established a global external reporting hotline and website (Integrity Hotline).</p> <p>Integrity Hotline</p> <p>Telenor Annual Report 2021 p. 65</p>	Principle 10 SDG 16
4. GOVERNANCE			
102-18	Report the governance structure of the organization, including committees of the highest governance body. Committees responsible for decision-making on economic, environmental, and social topics.	<p>Corporate Governance Report as part of Telenor Annual Report 2021 p. 22-32 Corporate Governance and Group Executive Management</p>	
5. STAKEHOLDER ENGAGEMENT			
102-40	List of stakeholder groups	<p>Stakeholder engagement is outlined in Telenor Annual Report 2021 p. 41</p>	
102-41	Collective bargaining agreements	<p>In our Nordic operations, all employees are covered by collective agreements due to the legal principle general application for all employees.</p> <p>In Asia, the first Union within the ICT-sector has been approved in Grameenphone, Bangladesh. The parties are working together towards a collective bargaining agreement. In Malaysia there is also a recognized union with a collective agreement.</p> <p>Telenor Annual Report 2021 p. 54-55 Labour Rights and Standards</p>	SDG 8
102-42	Identifying and selecting stakeholders	Reporting our performance	
102-43	Approach to stakeholder engagement	<p>Telenor Annual Report 2021 p. 34 and 41 Telenor Investor Relations Telenor Materiality Assessment Telenor updates on Myanmar</p>	
102-44	Key topics and concerns raised	<p>This is outlined in Telenor’s materiality assessment process.</p> <p>Telenor Materiality Assessment</p>	

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		Telenor Annual Report 2021 p. 39-40	
6. REPORTING PRACTICE			
102-45	Entities included in the consolidated financial statements	Telenor Annual Report 2021 -p.94 Reporting our performance	
102-46	Defining report content and topic Boundaries	Approach to defining report content and materiality matrix is outlined online: Telenor Annual Report 2021 -p.72-73	
102-47	List of material topics	Telenor's material topics Environmental <ul style="list-style-type: none"> • Climate • Environment Social <ul style="list-style-type: none"> • Digital skills • Human rights • Diversity and inclusion • Health, safety, people security and wellbeing Governance <ul style="list-style-type: none"> • Supply chain sustainability • Anti-corruption • Data privacy compliance • Cyber security Telenor Materiality Assessment	
102-48	The effect of any restatements of information given in previous reports, and the reasons for such restatements.	Telenor Annual Report 2021 - p.71 (asterisk below table) and p.73 (Reporting Boundaries)	
102-49	Changes in reporting	Telenor Annual Report 2021 -p.73	
102-50	Reporting period	Calendar year 2021	
102-51	Date of most recent report	Previous report published in 2021, covering calendar year 2020	
102-52	Reporting cycle	Annual	
102-53	Contact point for questions regarding the report	Teodora Mitrovska-Forbord E-mail: sustainability@telenor.com	
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Consolidated option	
102-55	GRI content index	The GRI index can be found here: Reporting and Verification	
102-56	External assurance	An independent assurance of the content of the 2021 Sustainability Report has been done by DNV Business Assurance: DNV verification statement	
GRI 103: MANAGEMENT APPROACH 2016			
103-1	Explanation of the material topic and its Boundary	Telenor Annual Report 2021 - p.46 – 61 provides an explanation and definition of each material area	
103-2	The management approach and its components	Telenor Annual Report 2021 - p.46 – 61 defines how each material area is managed	
103-3	Evaluation of the management approach	Each material topic has a corresponding chapter in the Sustainability part of the Annual Report	

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		where we also provide an evaluation of the management approach. Page references and any exemptions from the GRI standards may be found in the table starting next page. Please also see pages 13-16 in this document for summary of information.	
GRI 201: ECONOMIC PERFORMANCE			
2016			
201-1	Direct economic value generated and distributed	Telenor Annual Report 2021 - p.42	SDG 2, 5, 7, 8, 9, 10
201-2	Financial implications and other risks and opportunities due to climate change	Telenor's 2021 TCFD Report	Principle 7
201-3	Defined benefit plan obligations and other retirement plans	Telenor Annual Report 2021 - p.126 - note 26 - Pension obligations; The 2021 compensation to the Corporate Assembly and the Board of Directors is covered under the 2021 Executive Compensation Report available here .	
GRI 203: INDIRECT ECONOMIC IMPACT			
2016			
203-1	Infrastructure investments and services supported	Telenor Annual Report 2021 - p.42 and Telenor SDG Impact Assessment	SDG 2, 5, 7, 9, 10, 11
203-2	Significant indirect economic impacts	Telenor Annual Report 2021 - p.42 Telenor SDG Impact Assessment	SDG 1, 2, 3, 8, 10, 17
GRI 204: PROCUREMENT PRACTICES			
2016			
204-1	Proportion of spending on local suppliers	Identified omission: Percentage is not disclosed. Reason for omission: Telenor promotes fair competition through transparent and professional sourcing processes and equal treatment of all suppliers. Telenor optimises its global sourcing power to exploit market opportunities and thereby obtaining more attractive total cost of ownership. All local business units shall use group standards, processes, and agreements where they are established. Suppliers in competition for contracts with Telenor shall be able to trust our selection processes. As a result, we do not report the percentage of the procurement budget used for significant locations of operation spent on suppliers local to that operation. See also: Telenor Code of Conduct , Anti-corruption and Telenor Annual Report 2021 – p.64	SDG 1, 5, 8, 10
GRI 205: ANTI-CORRUPTION			
2016			
205-2	Communication and training about anti-corruption policies and procedures	A key element in the Anti-Corruption Programme is capacity-building and regular training of employees. Our anti-corruption training ranges from e-learning programs, dilemma-training and	Principle 10 SDG 16

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		<p>other awareness activities.</p> <p>Telenor Group’s commitment to integrity and transparency is clearly stated in Telenor’s Code of Conduct. A description of Telenor’s Anti-Corruption Programme is publicly available on the website: Anti-corruption</p> <p>The Integrity Hotline is a confidential channel available to all employees and Business Partners where anyone can ask questions and raise concerns about possible breaches of Telenor’s Code of Conduct, including relevant laws, regulations, and governing documents.</p> <p>See also Telenor Annual Report 2021 - p.65</p> <p>During 2021, Telenor performed more than 34,000 man-hours training of suppliers’ employees covering Health, Safety and Security as well as Anti-corruption. See also: Key ESG figures</p>	
GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016			
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Telenor Annual Report 2021 - p.141-143; Note 34 (Legal disputes and contingencies)	
GRI 302: ENERGY 2016			
302-1	Energy consumption within the organization	<p>For the indicators 302-1, 302-3 and 302-4; Telenor’s total GHG emissions and energy consumptions for 2021 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.</p> <p>Key ESG figures</p>	Principle 7, 8, 9 SDG 10, 13
302-3	Energy intensity	<p>Reported figures are for total Telenor Group in the financial year 2021.</p> <ul style="list-style-type: none"> • Energy intensity ratio for all our business units- where the ratio denominator is total revenues: 263 GWh/billion USD • All our reported fuel, electricity, heating/cooling consumptions are included in the energy intensity ratio. • The reported ratio uses energy consumed within the Telenor organization. <p>Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: Reporting our performance and Telenor Annual Report 2021 - p.71 (asterisk below table) and p.73 (Reporting Boundaries)</p>	Principle 7, 8, 9 SDG 10, 13
302-4	Reduction of energy consumption	Reported figures are for total Telenor Group in the financial year 2021.	Principle 7, 8, 9 SDG 10, 13

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		Telenor's total energy consumption was approximately 3,345 GWh. Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: Reporting our performance	
GRI 305: EMISSIONS 2016			
305-1	Direct (Scope 1) GHG emissions	For the indicators 305-1, 305-2, 305-3, 305-4 and 305-5; Telenor's total GHG emissions and energy consumptions for 2021 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol. Key ESG figures We use financial control as consolidation approach for our reported emissions: All operating business units where Telenor is a majority owner (owner of more than 50% of the shares).	Principle 7, 8, 9 SDG 10, 13
305-2	Energy indirect (Scope 2) GHG emissions	Total gross energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent for all our business units: Key ESG figures	Principle 7, 8, 9 SDG 10, 13
305-3	Other indirect (Scope 3) GHG emissions	Total gross other indirect (Scope 3 – Travel and transportation) GHG emissions in metric tons of CO2 equivalent for all our business units: Key ESG figures	Principle 7, 8, 9 SDG 10, 13
305-4	GHG emissions intensity	Reported figures are for total Telenor Group in the financial year 2021. <ul style="list-style-type: none"> GHG emissions intensity ratio for all our business units- where the ratio denominator is total revenues: 0.100 million tonnes CO2/ billions of USD All our reported fuel, electricity, heating/cooling consumptions are included in the GHG emissions intensity ratio. The reported ratio uses GHG emissions from both direct (Scope 1 and energy indirect (Scope 2) 	Principle 7, 8, 9 SDG 10, 13
305-5	Reduction of GHG emissions	Scope 1+2 GHG emissions - reduction from science-based target Baseline year 2019 (%) was 8%; Year-on-year company-wide Scope 1&2 GHG emissions cut was 11%; Scope 1+2 GHG emissions per mobile data traffic were 78 tonnes CO2e / petabyte More information; Telenor Annual Report 2021 – p-46-49	Principle 7, 8, 9 SDG 10, 13
GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT			

GRI standard	Standard disclosure	Telenor response	UN Global Compact
2016			
308-1	New suppliers that were screened using environmental criteria	Telenor require all suppliers to follow the Supplier Conduct Principles encompassing environmental and other sustainability requirements.	Principle 7, 8, 9 SDG 13
GRI 401: EMPLOYMENT			
2016			
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Benefits such as pension, insurance, allowances, and leave are all important elements ensuring total compensation is aligned with local market practice, regulations, and employment conditions, while also providing a foundation for the financial security and well-being of employees. Benefits are offered in alignment with local market regulations, and the cover may vary between different employment types. Telenor Annual Report 2021 – p-58 (Responsible Employer)	Principle 6 SDG 8
GRI 403: OCCUPATIONAL HEALTH AND SAFETY			
2018			
403-3	Workers with high incidence or high risk of diseases related to their occupation	Telenor Annual Report 2021 – p-59-60	SDG 8
GRI 404: TRAINING AND EDUCATION			
2016			
404-2	Programs for upgrading employee skills and transition assistance programs	Telenor continues to invest in upskilling employees as well as modernising the way we work. Telenor provides upskilling opportunities to all employees via the Telenor Academy, the global learning platform that manages training across all business units in Telenor. With an updated learning curriculum, Telenor provides upskilling opportunities on critical skills for the digital future, leadership and new ways of working for all employees. https://www.telenor.com/career/learning/	Principle 6 SDG 4, 5, 8,10
404-3	Percentage of employees receiving regular performance and career development reviews	All employees shall receive regular performance and career development reviews regardless of category and gender. This is a global group requirement.	Principle 6 SDG 4, 5, 8, 10
GRI 406: NON-DISCRIMINATION			
2016			
406-1	Incidents of discrimination and corrective actions taken	Telenor Annual Report 2021 – p-54, p. 65 and Telenor Integrity Hotline	Principle 6 SDG 5, 10, 16
GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING			
2016			
h407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Telenor is committed to respecting labour rights principles as laid down in UN Global Compact and ILO's fundamental conventions. These principles relating to respecting the rights to freedom of association and collective bargaining, the elimination of forced labour, child labour and	Principle 3 SDG 8

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		discrimination in the workplace, are reflected in Telenor's Code of Conduct and Group Policy People as well as Supplier Conduct Principles. Telenor shall comply with applicable laws and regulations. If there are differences between such laws and regulations and the standards set out in our Code of Conduct, Telenor will apply the higher standard consistent with applicable local laws. Labour rights	
GRI 408: CHILD LABOUR 2016			
408-1	Operations and suppliers at significant risk for incidents of child labor	All Business Units shall conduct a human rights due diligence including risk mapping in these areas. We practise a zero tolerance in this area and the risk is greater in our operations in Asia, especially manufacturing and work intensive production companies etc. All suppliers are legally bound to obey international standards in this area. This is also an important part of the regular inspections executed locally; we check compliance by numerous inspections across Group every year. Incidents in these areas shall be reported immediately and corrective actions are required at once. We also include this in training & awareness sessions/supplier conferences organised locally. See more about underage labour: Telenor Annual Report 2021 – p.63	Principle 2, 5 SDG 10, 16
GRI 409: FORCED OR COMPULSORY LABOR 2016			
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	See section Supply Chain Sustainability in Telenor Annual Report 2021 – p. 62-63 and website Supply Chain Sustainability	Principle 4 SDG 8, 10
GRI 410: SECURITY PRACTICES 2016			
410-1	Security personnel trained in human rights policies or procedures	Identified omission: Percentage is not disclosed. Reason for omission: Telenor's ambition is that all security personnel, directly or indirectly employed, shall have performed internal health, safety, security, and environmental training, where human rights and health and security issues are part of training. As all Telenor companies shall have management system according to ISO 45001, the follow up and training is part of the management system processes.	Principle 1 SDG 16
GRI 411: RIGHTS OF INDIGENOUS PEOPLES 2016			
411-1	Incidents of violations involving rights of indigenous peoples	In 2021 we are not aware of any reported incidents	Principle 1 SDG 2
GRI 412: HUMAN RIGHTS ASSESSMENT 2016			

GRI standard	Standard disclosure	Telenor response	UN Global Compact
412-1	Operations that have been subject to human rights reviews or impact assessments	To help us navigate and identify the most salient human rights impacts, we conduct human rights due diligence both at Group and business unit (BU) levels. Human rights impact is also included in our materiality assessment. Our activities are guided by the UN Guiding Principles on Business and Human Rights and other international frameworks including the Universal Declaration on Human Rights and the ILO Core Conventions. See Telenor Annual Report 2021 – p. 54. Further we conduct assessments related to e.g. specific projects, entry into new markets etc.	Principle 1
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Business partners having a direct contractual relationship with Telenor are required to comply with Telenor’s Supplier Conduct Principles (SCP) and are legally obliged to trickle down the requirements in their associated supply chain through the Agreement on Responsible Business Conduct (ABC). As at year-end 2021, we have signed more than 6,600 ABCs with almost all our active suppliers that we have defined as in-scope for ABC The ABC Agreements include human rights clauses. “Business partners” covers all contracting parties also significant investments agreements. Telenor Annual Report 2021 – p. 81	Principle 2
GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016			
414-1	New suppliers that were screened using social criteria	The Business Units evaluate the Supplier Conduct Principles risk for any existing or potential Supplier and/or its Sub Suppliers. Close to 100% of new suppliers were screened using labour practices criteria	SDG 5, 8, 10, 16
414-2	Negative social impacts in the supply chain and actions taken	During 2021, Telenor recorded and addressed 7 cases of underage labour (15-18 years involving hazardous work). The cases were investigated, and corrective actions were undertaken. There have been no incidents of child labour (12-14 years) identified in our supply chain since 2017. Telenor Annual Report 2021 – p.63	SDG 5, 8, 10, 16
GRI 416: CUSTOMER HEALTH AND SAFETY 2016			
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	We have not identified any incidents or non-compliances with H&S regulations and applicable standards in 2021	SDG 16
GRI 417: MARKETING AND LABELING 2016			
417-2	Incidents of non-compliance concerning product and service information and labeling	Telenor is not aware of any incidents or non-compliances concerning product and service information and labelling in 2021	SDG 12, 16

GRI standard	Standard disclosure	Telenor response	UN Global Compact
GRI 418: CUSTOMER PRIVACY 2016			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Telenor is not aware of any substantiated complaints regarding breaches of customer privacy and losses of customer data in 2021.	SDG 16
GRI 419: SOCIOECONOMIC COMPLIANCE 2016			
419-1	Non-compliance with laws and regulations in the social and economic area	Telenor Group's operations are subject to requirements through sector specific laws, regulations, and national licenses. Regulatory developments and regulatory uncertainty could affect the Group's results and business prospects. See Telenor Annual Report 2021 – p.17-19: Risk overview and note 34 Legal disputes and contingencies – p.141.	SDG 16

GRI 103: Management Approach

GRI 103-1 Explanation of the material topic and its Boundary

Please refer to Section 5 (pages 43 - 69) of [Telenor Annual Report 2021](#) for an overview of Telenor's material areas as defined in its materiality analysis. This section also addresses Telenor's ambitions and targets in each material area, provides an update from 2021 and an overview of the strategy to work towards the ambitions.

More information and process details can be found in the materiality assessment description [here](#) (103-1a). For Telenor, all material topics are relevant throughout our value chain, unless otherwise stated in the Reporting Boundaries section of the [Telenor Annual Report 2021](#) (p.73) (103-1b and c). Where relevant, any adjustments or limitations regarding boundary of a topic will also be found in the section (103-1c).

GRI 103-2 The management approach and its components - How we manage it

For Telenor, the purpose of the management approach is to control major risks and opportunities for all material topics, regardless of whether they are financial or non-financial. Therefore, material topics are in principle governed in the same way as described in our approach to Corporate Governance in general. For further information on Telenor's Management Approach, please see the [Corporate Governance](#) section on Telenor's website.

The overview of material areas is complimented by a set of key group policies with more detailed information about roles, responsibilities, and commitments for the material topics:

- [Telenor Code of Conduct](#)
- [Supplier Conduct Principles](#)
- [Telenor Group Human Rights Principles](#)
- [Our Culture](#)
- [Sustainability at Telenor](#)

GRI 103-3 Evaluation of the management approach

Each material topic has a corresponding chapter in the Sustainability part of the Annual Report where we also provide an evaluation of the management approach. Page references and any exemptions from the GRI standards may be found in the table starting next page. Please also see Table below for summary of information.

Additional information on GRI 103-2 and GRI 103-3 can be found in the table below:

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2021
<p>Climate - including energy efficiency, energy use and reduction of greenhouse gas emissions– as well as services and technologies that enable society/ customers to reduce their climate impact</p>	<p>Climate change is today one of the greatest challenges facing people, businesses, and governments. Climate related risks include potential damage to vital infrastructure and utilities through the impact of more extreme weather events. Please see Climate</p>	<p>Energy use and emissions are closely monitored and followed up in all operations in line with the Group Sustainability Policy.</p>	<p>Telenor Annual Report 2021 page 46-47</p>
<p>Environment - including EMS and waste management, circular economy, energy efficiency, energy use and reduction of greenhouse gas emissions</p>	<p>Telenor is committed to protecting the environment and contributing to the prevention of climate change. Please see Environmental Management</p>	<p>Environmental Management Systems (EMS) in line with ISO 14001 shall be in place and followed-up in all business units.</p>	<p>Telenor Annual Report 2021 page 58</p>
<p>Digital Skills - access to the service in all markets, including rural and remote areas. In emerging markets focus on bridging the digital divide.</p>	<p>A fundamental pillar of Telenor’s responsible business work is the commitment to ensure digital access for all, equip people with the necessary knowledge, resources to operate effectively and safely, and stimulate a supportive ecosystem that can address the risks and grow the digital resilience of people. This is part of Telenor’s business strategy and is managed accordingly throughout the entire Group.</p>	<p>Telenor leverages on, strengthens, and builds partnerships globally as well as locally. Focus is on providing access and skills to use digital products/services/internet, building on the Internet of Things, Artificial Intelligence and business-to-business portfolio to provide upskilling and reskilling to youth and small and medium enterprises, and building online safety efforts for children, youth and the vulnerable through relevant content, digital means and the company’s products and services. Telenor carefully tracks and reports on development of network capacity and coverage. This is reported all the way to top management at regular intervals.</p>	<p>Telenor Annual Report 2021 page 51</p>
<p>Human rights - ensuring that operations or business relationships do not infringe on human rights, -respecting the human right of freedom of expression, freedom of association and collective bargaining, the elimination of forced labour, child</p>	<p>Telenor’s Code of Conduct, Policies, Supplier Conduct Principles and Our Culture, provide the Telenor Group with a common approach as to how we treat each other, how we serve our customers, how we run our business and what we believe our role to be in the societies where we operate. Telenor is committed to respecting labour rights principles as laid</p>	<p>Detailed reporting on how we work with Human Rights can be found in our annual report. As part of our membership with the GNI, we have committed to implement the GNI Principles and undergo an independent assessment every two years to assess progress on this commitment. Telenor is promoting</p>	<p>Telenor Annual Report 2021 - page 53</p>

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2021
<i>labour and discrimination in the workplace, etc.</i>	down in the UN Global Compact and International Labour Organization’s fundamental conventions. These principles are reflected in Telenor’s Code of Conduct, Group People Policy and Supplier Conduct Principles. Upholding labour rights will also be crucial when addressing the future of work, as professions evolve due to automation and the energy transition.	partnerships based on good and trusting dialogue, e.g. in relation to acknowledged unions or through local cooperation bodies such as the People Council.	
Diversity & Inclusion <i>-including diversity, attraction and retention of the best people, training and development opportunities and career prospects</i>	At Telenor, attracting and retaining the best talent through learning and development opportunities as well as career prospects is fundamental to continued competitiveness and growth. Telenor also strives for diversity, inclusion, and equal employment opportunities in accordance with the People Policy.	Responsibility of tracking policy requirements, goals and targets lies with the line management. Group People and Sustainability oversees the process.	Telenor Annual Report 2021 - page 56
Health, Safety, People Security and Wellbeing (HSS) <i>- covers employees as well as in-house contractors, vendors, and suppliers; includes electromagnetic fields from masts and mobile phones, user complaints concerning issues such as radiation, radio waves and Wi-Fi</i>	Telenor sets high HSS standards. Maintaining a working environment and a culture that nurture HSS is important at Telenor. Telenor is committed to learn from experience and continuously improve its efforts within HSS. Whenever Telenor installs new network equipment, we ensure public health and safety by adhering strictly to the electromagnetic exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP).	Responsibility of tracking policy requirements, goals and targets lies with the line management and Group People and Sustainability oversees the process. When it comes to installation work and safety measures at antenna sites, all business units must work in accordance with national and international guidelines and these represent the basis for all our planning - this is monitored by the line management	Telenor Annual Report 2021 - page 59 and 60
Supply Chain Sustainability <i>- including human rights, occupational health, safety and personnel security, environment, conflict minerals, hazardous materials, etc.</i>	Telenor strives for high sustainability standards and continuous improvement in its operations throughout the supply chain and works to ensure that its suppliers take a similar approach. Telenor’s approach to supply chain sustainability is to legally oblige the supplier to uphold responsible business practice, monitor compliance with Telenor’s requirements and to undertake capacity-building among its suppliers.	Telenor carries out inspections to monitor compliance with the requirements on responsible business conduct.	Telenor Annual Report 2021 page 62

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2021
Anti-corruption <i>- including anti-corruption and bribery, anti-competitive behaviour</i>	<p>Telenor has zero tolerance for corruption. Our ethical standards promote proper business practices and reflect relevant laws, regulations, and internationally recognized standards. These standards are set out in our Code of Conduct, the Group Policy on Anti-Corruption, and other guidance and governing documents.</p>	<p>Ensuring the right corporate governance platform for ethics, anti-corruption, and transparency, undertaking social and environmental responsibility, and respecting human rights and labour rights, is monitored and managed through our Code of Conduct and other guiding documents.</p>	<p>Telenor Annual Report 2021 page 64</p>
Data Privacy Compliance <i>-keeping information safe and secure, being transparent about how we handle your data</i>	<p>Telenor's customers expect not only real-time, relevant, and individualised services, they also expect that their privacy is safeguarded. As a provider of mobile and internet connectivity, respect for the rights to privacy and freedom of expression is central to Telenor's core business.</p>	<p>The company approaches these issues from a privacy point of view as well as a security angle, with policies and manuals that set out mandatory requirements applying across all operations.</p>	<p>Telenor Annual Report 2021 page 66</p>
Cyber security <i>- avoiding information being overused for commercial or other purposes or stolen</i>	<p>As a network operator and a global provider of digital services, Telenor is at constant high risk of cyber-attacks. Advanced threat actors are increasingly aiming to steal information, modify customer data or make our services unavailable. Telenor is continuously implementing security capabilities to prevent and reduce the effect of a range of threats, including the ability to swiftly detect and respond to unwanted activities.</p>	<p>Alignment with our approach and governing principles is carefully monitored by our security functions.</p>	<p>Telenor Annual Report 2021 page 68</p>