

telenor | fiber

27 May 2026

## Report on the Norwegian Transparency Act

Telenor Fiber AS  
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[www.telenor.com](http://www.telenor.com)



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### 1. Introduction

This report is prepared in accordance with Section 5 (§ 5) of the Norwegian Transparency Act and summarises how Telenor Fiber AS (“**Telenor Fiber**”) identifies and assesses actual and potential adverse impacts on human rights and decent working conditions in its operations, supply chain and business partners.

Telenor Fiber is part of the Telenor Group. This report supplements the transparency report in Telenor ASA’s annual report, available at [www.telenor.com](http://www.telenor.com)

During 2025, Telenor Fiber carried out and documented activities to identify actual and potential adverse human rights impacts in its operations and supply chain. These assessments form the basis for the Company’s second report under the Norwegian Transparency Act.

The report reflects Telenor Fiber’s size, organisation and role in the value chain, and is based on a risk-based and proportionate approach.

The report is prepared by Telenor Fiber’s management and approved by the Board of Directors on 27 May 2026. It covers the financial year ending 31 December 2025.

### 2. Organisation and general information

#### 2.1 Telenor Fiber AS – Our business

Telenor Fiber is a Norwegian infrastructure company that owns, operates and develops passive fibre infrastructure in Norway. Telenor Fiber leases fibre infrastructure exclusively to Telenor Norge AS. Telenor Norge AS manages all end-user and wholesale customer agreements and service offerings; Telenor Fiber does not contract directly with end-users or wholesale customers.

In 2025, Telenor Fiber had six full-time employees. The registered address is at Telenor’s headquarters in Norway, with offices in Fornebu.

#### 2.2 Telenor Fiber’s Supply Chain

Telenor Norge serves as the primary supplier to Telenor Fiber, providing a comprehensive range of fiber infrastructure services. These services encompass the development (fiber roll-out), operation, and maintenance of the infrastructure. This partnership forms the core of Telenor Fiber’s supply chain activities.

In addition to the collaboration with Telenor Norge, Telenor Fiber's supply chain includes several key categories of suppliers and business partners. These comprise contractors who contribute to infrastructure projects, third-party owners of poles, and other third-party owners of fiber infrastructure. Internal service providers within the broader Telenor Group, as well as other Telenor subsidiaries, are also integral to the company's supply chain operations.

Operationally, Telenor Norge manages the day-to-day activities on behalf of Telenor Fiber. This includes overseeing all aspects of contractual relationships with contractors, third-party suppliers and partners, ensuring efficient and effective supply chain management. Telenor Fiber carries out oversight activities in close collaboration with Telenor Norge.

For further details and a broader overview of supply chain practices and HSE, reference is made to the transparency report of Telenor Norge AS, which is available at: [www.telenor.no](http://www.telenor.no)

### *2.3 Governance and Oversight*

Telenor Fiber follows Telenor Group's policies and the Telenor Code of Conduct, ensuring responsible business operations through a governance framework and regular assessments to address human rights and working conditions. Key policy areas include Anti-corruption; Competition Compliance; Finance; Health, Safety and People Security; Procurement; Third Party Risk Management; Sanctions and Export Control; Security; and the People Policy.

Human rights are central to Telenor's approach, guided by major international declarations and covenants. The company adheres to the UN Guiding Principles, OECD Guidelines, UN Global Compact, GNI Principles, and ILO standards, with designated resources for due diligence and stakeholder engagement.

Telenor maintains high workplace safety standards under ISO 45001 and complies with Employment Protection Act regulations. Telenor Fiber has completed human rights due diligence and risk assessment in 2025, and all employees have completed relevant training, e.g. Telenor's Code of Conduct, Anti-Corruption training, Human Rights Risk Assessment training, Integrity Hotline Awareness training, and Competition Compliance training.

Supply chain governance is managed globally through Telenor Procurement Company (TPC), which establishes Global Framework Agreements. Details about supply chain due diligence can be found in the Telenor Group Annual Report.

The Telenor Integrity Hotline offers a confidential channel for employees, suppliers and other stakeholders to ask questions and raise concerns about possible breaches of Telenor's Code of Conduct, including relevant laws, regulations and Governing Documents. The service is accessible via web and is available 24 hours a day, seven days a week.

## 3. Activities to identify actual and potential negative human rights impacts

### *3.1 Baseline and risk overview*

Our approach to human rights is anchored in the Telenor Way of doing business—Telenor's vision and values that guide how we operate.

The human rights due diligence conducted in 2025 covered a broad range of potential human rights risks based on the Telenor Group's salient human rights issues and was carried out in accordance with the UN Guiding Principles on Business and Human Rights.

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The assessment evaluated both actual and potential adverse impacts in Telenor Fiber's own operations and business relationships, taking into account the severity and likelihood of potential impacts, as well as Telenor Fiber's degree of involvement and leverage. Risks assessed as not materially relevant for Telenor Fiber were excluded from prioritisation due to the Company's limited operational role, lack of end-user interface and reliance on Telenor Norge AS for operational activities.

The Telenor Code of Conduct sets the principles and ethical standards for how we create value. As part of the Telenor Group, Telenor Fiber conducts and documents regular human rights due diligence to identify, prevent, mitigate and account for human rights risks and impacts in our operations and value chain.

In 2025, our due diligence and risk assessment did not identify any actual adverse human rights impacts in Telenor Fiber's operations or supply chain. Based on this assessment, and considering the relative severity and likelihood of potential impacts as well as Telenor Fiber's role and leverage, two priority areas with potential risk were identified and will be monitored in 2026:

- HSE and decent working conditions in the local supply chain
- HSE risks for Telenor Fiber employees

### *3.2 Supply chain risks*

Telenor Fiber's occupation is developing, operating and maintaining fibre infrastructure in Norway which requires a continuous focus to promoting and ensuring that HSE rights contractors and suppliers are respected throughout our supply chain.

For 2025, we have seen the positive trend continue, with a further decrease in the number of recordable workplace injuries among our supply chain contractors. This improvement coincides with significantly strengthened risk awareness and a more robust HSE culture, resulting from sustained, long-term collaboration with the contractors.

Although no adverse human rights impacts have been identified in Telenor Fiber's local supply chain, we will continue to monitor risks related to decent working conditions and will continue our human rights impact assessment in 2026, focusing on:

- Risk related to Health, safety and environment (HSE) in our local supply chain
- Risk related to Wages, Hours and Benefits

Follow-up of these risks is carried out through regular reporting from Telenor Norge AS, including HSE performance and incident reporting related to contractors and suppliers. Telenor Fiber reviews this information as part of its oversight responsibilities and uses it to inform continued monitoring and dialogue in 2026.

### *3.3 Risks related to HSE*

In 2025, Telenor Fiber maintained a strong safety performance, completing the year without any recordable workplace injuries.

Employee Engagement Survey is conducted annually with a 100% response rate in Telenor Fiber in 2025.

We have not identified any actual negative impacts on human rights and working conditions in our own operation. In 2026, we will continue the human rights impact assessment with a focus on the

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psychosocial working environment, including workload, deadlines, and resilience/coverage given the Company's lean organisation.

This area has been identified as a potential risk due to the Company's lean organisation and will be followed up through the HSE action plan, management dialogue and the annual Employee Engagement Survey.

## 4. Activities to prevent and mitigate negative human rights impacts

### *4.1 Mitigating activities related to risks related to working conditions in our local and global supply chain*

Telenor Fiber is responsible for ensuring that work carried out on its behalf is performed in compliance with applicable HSE requirements and contractual obligations.

Telenor's Supplier Conduct Principles (SCP) set requirements for responsible business conduct, including human rights, HSE, labour rights, freedom of expression and prohibited business practices. Compliance with the SCP is a contractual requirement for suppliers and partners and is supported by the Agreement on Responsible Business Conduct (ABC), which also extends relevant requirements to their supply chains.

Telenor conducts supply-chain due diligence to identify, assess and mitigate risks covered by the SCP. This includes risk-based HSE requirements, training and follow-up, as well as systematic incident reporting and investigations to support learning and continuous improvement.

While operational responsibility for contractor and supplier management rests with Telenor Norge AS, Telenor Fiber retains overall responsibility under the Norwegian Transparency Act and exercises oversight through reporting, dialogue and escalation mechanisms where relevant.

For additional details, reference is made to the transparency report of Telenor Norge AS ([www.telenor.no](http://www.telenor.no)).

### *4.2 Mitigating activities related to HSE*

HSE training is mandatory for managers in Telenor Fiber and is renewed every five years. In line with the Norwegian Labour Inspection Authority framework, Telenor Fiber has a safety representative who supports systematic HSE work and serves as a link between employees and the employer. Telenor Fiber also maintains an HSE action plan, updated annually and approved by the company, covering the physical and psychosocial working environment, required training, and measures related to sick-leave risk and competence coverage.

Synergi Life is available to all employees and is used to report incidents, accidents and near-misses. The annual Employee Engagement Survey is used to gather feedback and identify HSE and work environment improvements.

### *4.3 Follow-up and continuous improvement*

Identified potential risks are followed up through regular reporting, annual reviews of the HSE action plan and periodic reassessment of human rights risks. The results are reviewed by management and form part of the basis for future mitigation measures and reporting under the Norwegian Transparency Act.

Fornebu, 27 May 2026  
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