

Sustainability

GROUP POLICY



telenor group

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GROUP POLICY

Sustainability

Policy owner: EVP People, Sustainability and External Relations

Approver: President & Group CEO

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1. Purpose & Scope

The purpose of this policy is to ensure that Telenor companies operate responsibly towards the society and the planet in accordance with requirements and commitments, by ensuring that:

- Human rights are respected, and steps are taken to avoid and not be complicit in human rights abuses, in accordance with the UN Guiding Principles on Business and Human Rights and other international standards such as the OECD Guidelines for Multinational Enterprises, the UN Global Compact and the Global Network Initiative Principles.
- Environmental impacts are minimised and emissions are reduced.
- Continual contributions are made towards the UN Sustainable Development Goals.
- Sustainability Reporting is in accordance with requirements applicable to Telenor.

2. Requirements

2.1. Awareness & Capacity Building

The Telenor Company shall ensure sufficient internal awareness of Telenor's commitments and approach towards Human Rights, Climate & Environment, Sustainability projects, programmes and partnerships and Sustainability Reporting. The Telenor Company shall provide training and capacity building and foster cross-functional collaboration to pursue continuous improvement in these areas.

2.2. Human Rights

Telenor's approach to human rights is based on the United Nations Guiding Principles on Business and Human Rights and key international instruments and commitments (see Definitions). Where national law and international human rights standards differ, the Telenor Company shall follow the higher standard; where they are in conflict, the Telenor Company shall adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.

The Telenor Company shall communicate its human rights commitment actively to external stakeholders.

2.2.1. Human Rights Due Diligence

Recognising the responsibility to uphold universal human rights, the Telenor Company shall conduct regular human rights due diligence, with the objective of identifying practical and actionable steps to address human rights risks and opportunities.

The due diligence shall take a risk-based approach in accordance with the UN Guiding Principles on Business and Human Rights, and in alignment with Telenor's approach to human rights as outlined in Telenor's Code of Conduct and in this policy, as well as other public commitments. The due diligence shall include, but not be limited to, the human rights context (country and/or industry specific), the views of key rights- and stakeholders, as well as an analysis of actual and potential human rights risks and mitigations.

Mitigation measures shall build on existing policies, programmes and processes, thereby integrating human rights into existing activities wherever possible, including during significant developments in the market or to the Telenor Company's business portfolio or structure. In this regard, high-risk areas shall be prioritised.

The process and the outcome of the due diligence, including mitigation status and plans, shall be documented and reported to the Telenor Company Management, at least annually. In cases where significant human rights risks are identified as part of the due diligence, the Chair of the Telenor Company Board shall be notified as and when they are identified.

2.3. Environment and Climate Protection

Recognising the responsibility to protect the environment and contribute towards climate change mitigation and adaptation, the Telenor Company shall:

- Establish and maintain an Environmental Management System (EMS) in accordance with the ISO 14001 standard.
- Regularly undertake a materiality assessment and identify risks and opportunities of major environmental aspects.
- Perform regular risk assessments for operations, including extreme weather events related to climate change, and use the results in planning of network expansion and protection of existing infrastructure.
- Consider environmental impacts and use sustainability criteria in all procurement processes as per Group Procurement Policy.
- Minimise the level of harmful emissions to water, soil and air.

- Work to continuously optimise energy consumption and minimise it where possible, particularly from carbon fuels.

2.3.1. Greenhouse Gas Emissions

- Pursue gradual reductions of greenhouse gas emissions from own operations (i.e., Scope 1&2 emissions) in line with Telenor's science-based targets.
- Influence suppliers to improve their own environmental performance (i.e., Scope 3 emissions) and set science-based targets.

2.3.2. Waste Management, Circular Economy and Material Use

- Use a sustainable waste management system following the waste hierarchy (prevent, reuse, recycle, dispose) for both e-waste and municipal waste. No e-waste shall be landfilled and certified suppliers of e-waste services, or those following international standards for e-waste recycling, shall be prioritised.
- Continuously work to minimise the use of hazardous substances and ensure clear guidelines are in place for the procurement, storage, handling and use of chemical substances.
- Make reasonable efforts to minimise the use of natural resources, including water and raw materials, and to protect natural ecosystems.

2.3.3. Eco Friendly Solutions and Environmental Enablement

- Assess potential business initiatives and partnerships offering eco-efficient solutions (climate and environmental enablement), specifically their quantified potential for revenue, CAPEX and OPEX eligibility or alignment with the EU Taxonomy.

2.4. Sustainability Partnerships, Programmes and Projects

In line with Telenor's commitment towards the UN Sustainable Development Goals (SDGs) the Telenor Company shall at least annually assess opportunities to undertake sustainability programmes, projects and partnerships aligned with Company operations. Initiatives shall be anchored in well-defined societal and business needs and have clearly identified goals.

When considering Sustainability partnerships, the Telenor Company shall:

- Ensure funds allocated to such projects and programmes are appropriately tracked and that proper monitoring procedures are in place and agreed with the sustainability partner.
- Select reputable and recognised partner organisations (public and/or private) that support Telenor's purpose and values and are able to address social and environmental challenges and opportunities by leveraging mutual competences and synergies.
- Refrain from entering into sustainability partnerships with religious and faith-based institutions, political, military and police organisations. Any decision to

deviate from this shall be taken by the relevant Business Area EVP in accordance with Group Policy Business Partner Management.

In the case Telenor maintains global sustainability partnership agreements accessible to the Telenor Company, these shall be prioritised during the assessment process. The Telenor Company shall ensure that any projects and programmes undertaken with global sustainability partners, and the fund allocated therein, shall follow the global partnerships governance framework established by Telenor.

3. Sustainability Reporting

Measuring the sustainability performance of Telenor is central in understanding the impact of the Telenor Company's operations, to drive continuous improvement and maintain a transparent dialogue with stakeholders.

The Telenor Company shall be committed to Sustainability reporting in accordance with applicable requirements, recognised reporting standards, and as per the ESG (Environmental, Social, Governance) reporting requirements set by Telenor and the Business Areas. Sustainability reporting shall be transparent, cover material areas and shall provide stakeholders with a timely, true and fair depiction of the Telenor Company's activities in that area.

The Telenor Company shall ensure external sustainability reporting in accordance with applicable local requirements and commitments.

4. Reference Documents

- Group ESG reporting guidelines
- Group Guideline Human Rights Due Diligence
- Group Guideline Handling of Authority Requests
- Group Guideline Climate and Environment
- Group Policy Business Partner Management
- Group Guidelines Global Sustainability Partnerships

5. Definitions and abbreviations

Key international instruments and commitments of which the Policy is based on:

- The Universal Declaration of Human Rights (UDHR)
- The International Covenant on Civil and Political Rights (ICCPR),
- The International Covenant on Economic, Social and Cultural Rights (ICESCR)
- The principles concerning fundamental rights in the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work.