

Statement of the work on Diversity and Inclusion 2022

This equality statement is prepared for the company Telenor ASA as the headquarters of Telenor Group, reporting as an employer in the geography Norway.

In Telenor ASA, we work for diversity and inclusion 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 grounds.

Part 1: The factual status of gender equality

The factual situation on gender equality in Telenor ASA for the period January-December 2022 is presented in the following. The figures below represent Telenor ASA as an employer in Norway in line with Norwegian reporting requirements. Telenor Norway presents its own report.

The reporting requirements defines reporting of gender pay differentials and involuntary part-time every other year and this will be included in Telenor ASA's diversity and inclusion statement for 2023.

Telenor aims to secure equal pay across all functions and levels of the organisation and conducts on a regular basis group-wide analysis and action planning in all business units to understand and address any gender pay differentials. More details regarding Telenor's Leadership Team (GLT) can be found in Telenor's executive compensation report.

1 Distribution of women and men per position level

	Gender representation at different position levels number of employees	
	Women	Men
Total distribution women vs men in the company	122	187
Group Leadership Team (GLT)	3	2
Telenor Top Leaders (TTL)	10	9
Band A	11	52
Band B	28	40
Band C	27	51
Band D	21	26
Band E/F	22	7

1.1 Definition of employee categories

The categorisation is based on position level ("bands") and the categories are defined across Telenor ASA's organisational units. The categorisation is based on several assessment factors, including the positions' responsibilities, impact, complexity and required experience. (For more information regarding position levels and categorisation, see endnote ⁱ⁾)

Pension

Telenor ASA offers a defined contribution plan with company contributions for pensionable earnings up to 12G (G is the national insurance basis amount) with individual investment selections. Telenor also has a closed defined benefit plan limited to pensionable earnings of 12G, the plan as closed for new entrants in 2006. All new hires since 2006 are enrolled in the defined contribution plan.

1.2 Gender distribution

The overall women representation in Telenor ASA at year end 2022 is 39%. At the senior management level Telenor Top Leaders (TTL), 53% are women, which is an increase of 7 percentage points from last year. Of Telenor ASA's five members of the Telenor Group Leadership Team, three are women.

Following the restructuring and resizing the company has undergone in 2022 there has been changes in the composition and size of management levels. One result of this is a lower woman representation in the leadership pipeline below TTL level.

1.3 Temporary employees, parental leave and actual part-time

The gender distribution has been mapped in terms of temporary employment, parental leave, and actual 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	
Women	Men	Women	Men	Women	Men	Women	Men
122	187	1.6	0.6	20.0	12.1	0.3	0

Parental leave

In 2022, 11 employees took statutory parental leaves (ref. Working Environment Act section 12-5). Men accounted for 45% of those claiming parental leave in 2022 and took an average of 12.1 weeks. Women accounted for 55% and took an average of 20.0 weeks in 2022. 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 2022.

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 acceptance, for taking parental leave.

Part-time work

Telenor ASA has a very low rate of part-time positions.

1.4 Sick leaves and recruitment

Sick leaves

The rate of sick leaves for Telenor ASA employees in 2022 was 1.9%, compared with 1.7% in 2021. For women, the rate of sick leaves was 3.1%, which is an increase of 0.5 percentage points from 2021. For men, the sick leave rate was 1.1%, a decrease of 0.1 percentage points from 2021.

There is minimal recorded absence related to child or child carers illness. This is assumed to be related to Telenor's Flexible Way of Work, which has allowed employees the ability to work, to some extent, during the illness of children or child carers.

Recruitment

In 2022, Telenor ASA recruited 21 new employees, whereof 11 (52%) women.

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

1 Principles, procedures, and standards to promote diversity and inclusion and to prevent discrimination

Telenor ASA is committed to Telenor Group's HR policies, where gender equality, anti-discrimination, diversity, and inclusion are a vital part, including in the Code of Conduct which states 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".*

All Telenor employees are required to conduct eLearning including dilemma training and sign-off on the Codes of Conduct on an annual basis. This was also carried out in 2022. Violations of the Code of Conduct and other guidelines shall be reported to the immediate line manager or by using Telenor's integrity hotline. In the autumn of 2022, 83% of Telenor ASA employees said they feel they could report violations of the Code of Conduct if they were to observe any. 9% answered neutrally, while 8% answered they were not comfortable to report any observations.

Telenor ASA follows Telenor's Group Manual for Diversity and Inclusion, People Policy and Telenor's whistleblowing procedures, which include the Integrity Hotline where violations of Telenor's guidelines can be reported anonymously, if desired. Incidents reported to the Integrity Hotline are followed up by the company's compliance function with necessary investigations and corrective measures. This applies to all negative/reprehensible incidents, including anything concerning equality. In 2022, no issues concerning equality or discrimination were raised.

Telenor's guidelines for flexibility provides employees the opportunity to more frequently choose their location of work. This supports work-life balance and is also considered an advantage for employees with disabilities. These guidelines were developed and implemented through Telenor's Flexible Way of Work project in 2021 in close collaboration with employees and union representatives.

Telenor ASA is bound by collective bargaining, collective agreements, and local agreements between Telenor ASA and EL og IT, NITO, Tekna and Negotia. The collective agreements also include provisions for equality and diversity. Telenor ASA 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.

Telenor ASA follows Telenor's diversity and inclusion requirements and the principles that are applicable in all business units, which include the following:

- Ensuring that diversity and inclusion are reflected in the recruitment, selection, promotion and retention processes
- Providing learning and development opportunities that raises awareness and provides practical guidance on diversity and inclusion, so that all employees can actively contribute to building a workplace that embraces diversity and inclusion
- Supporting and promoting internal networks and employee resource groups that uplift and create a sense of belonging for diverse and under-represented groups

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

2.1 Overall structure for the diversity and inclusion agenda

Telenor ASA's management and the union representatives are focused on complying with our internal policy documents, including the Diversity & Inclusion policy. Equality issues are mainly considered as an integrated subject in various meeting arenas between management and elected representatives, who regularly meet with an open agenda, both formally and informally, at various levels of the company. In 2022, an important area of dialogue has been the discussions with the unions concerning the company restructure process. There have not been any meetings where equality has been the sole topic.

Telenor ASA's Board of Directors has strong focus on, and great commitment to diversity and inclusion. The Board of Directors has established four committees of the Board, one of which is the People and Governance Committee (PGC). The PGC is a preparatory working committee with respect to people and governance issues. The PGC receives regular updates on people and governance-related matters and monitors the performance on these areas.

The Working Environment Committee (WEC) plays an important role in various topics related to health, safety, and the working environment. The WEC in Telenor ASA has met 4 times in 2022. Relevant topics that have been discussed in WEC meetings in 2022 are:

- Organisational restructuring, including risk assessment
- Usage of occupational health services
- Follow-up of employee surveys
- HSE training activities for managers and employees and general HSE updates
- Sick leave rates
- Flexible Way of Work

Telenor emphasise on female representation and prioritise gender balance as part of our strategic ambition for diversity and inclusion. This is expressed through the goal of 35% women senior leaders by 2023 and 40% by 2025.

Telenor has its own learning platform, Telenor Academy, with a considerable amount of training material covering gender equality, diversity and inclusion for employees and managers.

2.2 We discovered the following discrimination risks and barriers to diversity and inclusion

Our employee engagement survey, Our Voice, is an important mapping tool for uncovering discrimination risks and barriers to equality. The survey is conducted globally each autumn. In addition, several smaller pulse surveys are carried out during the year. In addition to the employee surveys, cooperation with the union representatives and WEC is very important to understand issues and challenges concerning the work environment, sick leave rates and any equality issues.

The latest employee survey was conducted in the autumn of 2022. Below are some examples of showing how employees perceive the overall equality situation in the company:

- When employees are asked if they feel they can 'be themselves' at work, 84% answer positively, 11% answer neutrally and 5% answer negatively.
- When employees are asked if they feel everyone has the same opportunities for development regardless of gender, nationality, age, physical ability, personal background, or any other cause of discrimination, 73% answer positively, 16% answer neutrally and 11% answer negatively.
- When asked whether there is necessary flexibility to ensure work-life balance, 84% answer positively, 10% answer neutrally and 6% answer negatively.
- When asked whether employees feel they can express their opinions without fear of negative reactions, 75% answer positively, 12% answer neutrally and 12% answer negatively.

Although the vast majority of employees responds positively or neutrally to these questions it is important to identify the need for measures to make changes for those who answer negatively. Further discussion and mapping of causes, as well as the implementation of relevant measures based on the results, is handled locally in each department.

In addition, we point out the following risk factors for the state of gender equality in Telenor ASA:

- There is a predominance of men in mid-level management and expert roles
- There is a predominance of women in the more operational and administrative positions
- There is a significant gender imbalance in the technology area
- There are fewer women ready for promotion to higher management positions

2.3 Possible causes of risks and hazards

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

- There is a low proportion of women in the technology area, where traditionally there are fewer women with the required education
- There is considerable competition in the market for qualified labour in several important areas of the company's business, particularly in technology and business security.

2.4 We have initiated/implemented the following measures in 2022

Telenor ASA follows a structured process for follow-up their teams through the year, called People Dialogue. This includes established processes for appraisals, defining goals, and setting development plans for employees individually. The immediate manager is responsible for following up their team members, and this shall take place in accordance with the personnel policy without any form of discrimination.

Gender

Telenor is a partner to the SHE Community and hosted an executive Diversity & Inclusion lunch for private and public sector companies in March 2022.

In the SHE Index 2022, a voluntary measurement of how companies perform on gender balance, gender equality policies and diversity and inclusion, Telenor's companies in Norway were graded 86 in SHE Index Score.

Telenor marked International Women's Day on the 8th of March on our internal website, Workplace.

Disabilities

Telenor ASA participates in the Open Mind programme, which was initiated and is operated by Telenor Norway. During 2022, Telenor ASA employed one candidate from this programme. The programme began in 1996 to contribute to the inclusion of groups that have fallen outside the labour market, and it is carried out in cooperation with the Norwegian Labour and Welfare Administration (NAV). The programme has two target groups, persons with disabilities and persons with an immigrant background from countries outside the EU. The programme lasts for one year and includes internships in various parts of the company. This is an important contribution in the work to strengthen our culture of inclusion.

Our model for flexible way of work that provides employees the opportunity to more frequently choose their location of work, is considered an advantage for employees with disabilities and can contribute positively to increasing their proportion in the company.

Ethnicity

At Telenor ASA, there is a high level of ethnic diversity with employees of many different nationalities. This enriches the culture and helps create greater understanding and interaction across Telenor Group's business units and in the markets in which we operate. We use English as the standard working language to prevent anyone from feeling left out due to language barriers.

The company actively uses mobility programmes that allow employees to work on assignments abroad for shorter or longer periods in the various business units. As part of a review and revision of Telenor's Mobility Policy in 2022, new and better benefits for coverage of nursery, kindergarten, and school for accompanying children as well as better spouse support for career advice, education and upskilling were introduced. Our goal with this includes reduction of possible obstacles for women taking assignments abroad. There is also a global Telenor internal labour market, where employees are given the opportunity to apply for positions across national borders.

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

Amongst employees in Telenor ASA, we find a diverse representation of religions and beliefs, and it is important for us to facilitate celebration of religious holidays. In our canteens, we also emphasise on offering a varied menu, adapted to employees with differing religious affiliations. Employees at the head office at Fornebu have access to a prayer room.

Sexual orientation, gender identity and gender expression

All employees in Telenor ASA should be able to work without experiencing discrimination based on sexual orientation, gender identity or gender expression.

Telenor has in 2022 committed to the UN Standards of business for LGBTI+ rights that sets standards of conduct for business tackling discrimination against LGBTI+ people.

In May 2022, Telenor together with several other Telco companies hosted the first Global Virtual Pride conference to promote and support the rights for the LGBTI+ community.

Further information on human resource areas:

Recruitment

Telenor ASA strives to be a diverse and inclusive workplace, and this is one of the main focuses for recruitment in the company. In our recruitment processes, as far as possible the final rounds should have candidates of both genders. This is followed up by the recruitment team in collaboration with the recruiting manager. We also strive to ensure female leaders are present in interviews of female candidates. When external recruitment partners are used, we ensure that they have the same focus on gender balance and diversity.

Vacancies in the company are always first advertised internally. We have a global internal labour market, that give employees the opportunity to apply for positions across the company and across national borders.

Telenor ASA has in recent years run several trainee programmes, usually starting every other year. Over the course of one year, the candidates have two work rotations and work a period abroad to gain an understanding of how Telenor operates in the various markets. In the programme that started in August 2021 50% were women.

Compensation and working conditions

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

The company has conducted salary negotiations with all four unions and in this connection also provided managers with guidance on how to distribute salary review budgets in an equitable way, including for employees on parental leave and sick leaves.

Telenor ASA covers the full base salary and does not limit payments to 6G in the event of illness and parental leaves. We also cover full pay for fathers and co-mothers for the two weeks' leave in connection with the birth of their child. With regards to parental leave, it is assumed that providing full pay during the leave may encourage more men to take parental leaves.

All employees and managers in the company are offered training regarding diversity and inclusion on our e-learning platform. Telenor ASA offers regular health, safety, and environment (HSE) courses for managers and HSE managers in all companies.

In 2022, we have as part of revision of our short-term incentive plan removed the deduction in bonus for employees on parental leave. This is estimated to help even out gender pay differences as women usually take out more parental leave than men.

Promotion

The leadership teams conduct annual People Forums, where career development for team members is one of the topics. There is a focus on increasing the proportion of women being promoted, though defining specific development plans which are regularly followed up by the leader and the employee through the People Dialogue.

In addition, the company emphasises that everyone should have the same development opportunities regardless of gender, nationality, age, physical abilities, personal background or any other basis for discrimination. This is measured annually in Telenor's Employee Engagement Survey - Our Voice.

Opportunities for development

Employees have outlined their own development plans in consultation with their manager. All employees are offered 40 working hours during the calendar year for own learning and development. This initiative is called the 40 Hour Challenge.

Most employees report that they believe the development opportunities are the same for all employees, regardless of their background. Employees are also offered various management development courses and advancement programmes.

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

Telenor ASA implemented in 2021 Telenor's model for increased flexibility related to location of work and we have continued our work with the model in 2022. Employees can to a large degree within a certain framework, choose where they want to carry out their work. This has been developed in close cooperation and discussions with the unions. We consider increased flexibility as beneficial, helping ease the combination of work and family life, care responsibilities, getting children to and from kindergarten, as well as the ability for employees with chronic illness or disabilities to work.

Work against harassment, sexual harassment and gender-based violence

Telenor ASA has its own Compliance function and whistleblowing routines for reprehensible incidents, including for harassment in various forms. Incidents can be reported via the Integrity Hotline, available to all employees. One concern falling into this area has been reported in 2022 in the Integrity Hotline but has been concluded as "non substantiated" after the investigation process.

2.5 Planned measures for the coming year

In 2023, we will continue our discussions with the unions, safety delegates and WEC the establishment of a yearly planning wheel for equality work, where the basis will be the four-step model for active equality work in section 26 of the Equality and Anti-Discrimination Act.

Telenor's Learning & Development department has developed an e-learning programme, Diversity & Inclusion Foundation, which is available to all managers and employees on our e-learning platform. This programme includes modules such as Recognising Discrimination, Unconscious Bias, Micro-aggressions and Diversity and Inclusion in the Workplace. The programme is planned renewed in 2023, and HR in Telenor ASA will encourage employees to complete this e-learning programme during the year.

Telenor will continue the Open Mind programme for the two previously described target groups in 2023. Telenor ASA is positive to the potential hiring of candidates from Telenor Open Mind and other external/public work training programmes.

Telenor ASA aims to secure equal pay across all functions and levels of the company and will continue our analyses of gender pay differentials. Where unexplained pay differentials between men and women are discovered, measures will be considered.

Telenor will continue the partnership with the SHE Community and participate in Telenor Executive Lunch Workshop to discuss opportunities and challenges with regards to Diversity & Inclusion. In addition, there are plans to:

- Partner with diversity.no to engage Telenor employees in topics related to LGBTI+
- Activate a Rainbow Network in Norway to plan for Pride 2023 and other activities
- Re-activate an extended D&I Network

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

There is still more work to do when it comes to gender balance in the company. We currently have a total share of 39% women, and it is important to continue working to maintain this share and to improve the gender balance, both in total and in the various areas of the company.

We will continue to work actively to recruit women in the future, especially in expert and leadership positions at higher levels and in areas that have traditionally been male dominated. This also applies to recruitment of men in lower position levels.

In recent years, we have been working to develop our process for People Dialogue, and these conversations are an important tool for the further development of the company. The focus will be on ensuring that all employees have an active development plan that is continuously maintained and updated to help ensure the company's current and future needs for competence in the workforce. We also consider this an important measure for the improvement of gender balance in the company, by planning adaptive measures for the improvement of gender balance in the company, by planning adaptive measures to further prepare women for senior leadership and advanced roles of expertise in higher position levels.

Employee surveys show that the vast majority of employees believes that everyone in the company has equal opportunities, regardless of gender, nationality, age, physical health, personal background or other possible causes of discrimination. Similarly, the vast majority of employees feel they can be themselves at work. Telenor sees this as highly positive. However, there is the potential for further improvements, and this will be followed up in the various departments when working on employee survey measures.

It is an important part of our managers' training in the Flexible Way of Work that working from home should not affect individual 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 equality. We will continuously assess the need for any measures in this context.

Telenor ASA will continue to recruit candidates via the Open Mind programme, both people with disabilities and people with minority background. We consider the programme to be an important contribution toward equality, not only in the company, but also at the societal level.

Although we consider the state of equality in the company overall to be at a high level, with many positive activities and measures, we see that an even more systematic approach is needed for equality work. In 2023, the company will work even more systematically for equality. We will work actively with the unions and the WEC and safety delegates to make the necessary priorities and establish suitable meeting arenas.

Fornebu, March 21st 2023
Board of Directors, Telenor ASA

ⁱ Description of position levels ("bands")

Group Leadership Team (GLT)

This group includes Group President & CEO and the other members of the Group Leadership Team (Executive Vice Presidents - EVPs) employed by Telenor ASA.

Telenor Top Leaders (TTL)

This group includes senior management roles for a group unit or a larger functional area within such a unit. The positions are defined as Senior Vice Presidents (SVPs). These are roles that establish long term global strategies or management principles for Telenor Group within their functional area. Decisions are guided by Telenor's strategic direction and ambitions. The positions are part of Telenor Top Leaders, and they report to members of Group Leadership Team.

Band A

This group includes management and expert roles for a group unit or a functional area within a group unit. The positions are defined as Vice Presidents (VPs). The management roles can be described as senior management roles (TTL-1) with responsibilities for establishing and implementing plans to achieve the company's overall strategies and ambitions, as well as setting goals within their own functional areas. The expert roles are recognised as a position of senior expertise in one or more key functional areas where expertise is leveraged across Telenor's global organisation to achieve significant business impact.

Band B

This group includes management and expert roles responsible for a functional area or a sub-area within a function. The roles in this group are mainly defined as Director roles. The roles contribute on the strategic/tactical level by planning and implementation of strategic initiatives. The management roles are defined as senior management responsible for deliverables and results for own units. The roles are responsible for resources, policies, and guidelines, as well as processes within their area of responsibility. The expert roles at this level are senior positions that require specialised depth and/or scope of expertise in their own field. The roles interpret complex internal or external business problems and recommend solutions/best practices based on basic understanding and market insight.

Band C

This group includes senior expert and specialist roles that have functional professional responsibility within areas of great impact. The roles require depth and/or breadth of competence within own area. The roles contribute on the tactical level with the planning and implementation of strategic initiatives and/or recommend solutions/best practices for complex internal or external business problems.

Band D

This group includes expert and specialist roles that have functional professional responsibility or partial responsibility. The roles require a high level of specialised knowledge and experience in their own field or broad competence in several related disciplines. The roles at this level are responsible for delivering and implementing action plans within their area of expertise.

Bands E and F

This group includes specialists working at the operational level with the implementation of action plans, identification and solving problems and providing recommendations within their own field. The roles require a high level of knowledge and experience in their discipline.