



telenor
group

GRI CONTENT INDEX 2022



Telenor Content Index 2022

GRI Sustainability Reporting Standards



Preface

Telenor supports the Global Reporting Initiative (GRI) – as an Organisational Stakeholder – and its initiatives to drive sustainability reporting. Telenor reports in accordance with the GRI Sustainability Reporting Guidelines.

Statement of use

Telenor ASA has reported in accordance with the GRI Standards for the period 1 Jan 2022 – 31 Dec 2022. Scope of the reporting is Telenor ASA and all Telenor’s subsidiaries directly controlled by Telenor ASA (“business units”).

Materiality assessment

In 2022, Telenor performed a double-materiality assessment conducted in line with the European Union’s Corporate Sustainability Reporting Directive (EU CSRD), the draft European Sustainability Reporting Standards (ESRS) and the guidance of the Global Reporting Initiative (GRI) 2021.

The scope of the assessment was a corporate-wide qualitative assessment and a high-level strategic prioritization. Risks, opportunities and impacts were identified depending on where the impact lies in the value chain – direct operations, suppliers, or end-users. Where risks, opportunities or impacts differed, the assessment highlighted the highest risk.

The materiality assessment process consisted of five main steps:

1. **Identification of sustainability topics relevant to Telenor** based on guidance and requirements as set in the relevant reporting standards including GRI, EU CSRD and ESRS (drafts), SASB, TCFD recommendations, GHG protocol, SDGs, UN Global Compact, etc.
2. **Desktop research and draft scoring** based on:
 - Internal Telenor documentations including previous assessments conducted by Telenor such as the Corporate-wide Climate and Human Rights Impact Assessments
 - Public resources and BSR expertise
 - The risks identified by Telenor’s enterprise risk management process
 - Feedback from external analysis and rating of Telenor’s ESG performance
3. **Focus group interviews to identify and assess impacts** and collect feedback on draft ratings:
 - Methodology aligned with Telenor’s Enterprise Risk matrix (severity and likelihood)
 - 20 internal stakeholders interviewed from across different levels and regions in the Telenor organisation
 - 7 external stakeholders interviewed – including suppliers, investors, industry associations, Non-Governmental Organisations
 - Identification and analysis of the impacts in each material topic:
 - Impact on Society and Environment - the criteria for assessing impact on society and the environment are set by global standards (GRI, EU CSRD, etc), considering scale, scope, and remediability.
 - Impact on Business (risks and opportunities) - the criteria for assessing impact on business leverage Telenor’s Enterprise Risk Management framework (severity and likelihood)
4. **Revising assessment based on quantitative and qualitative input from stakeholders.**
5. **Validating results** in a workshop with internal stakeholders.

The analysis identified a long list of 20 topics, split into Environmental, Social and Governance topics and prioritised the top 12 most material topics for Telenor, based on the significance of impact to society and

environment, impact on business, and the link to the company’s strategic objectives. These top priority material topics and corresponding GRI disclosures include:

TELENOR TOP PRIORITY MATERIAL AREA	CORRESPONDING GRI DISCLOSURE
Climate Adaptation	GRI 302: ENERGY 2016 GRI 305: EMISSIONS 2016 GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016
Climate Mitigation & Energy Use	GRI 302: ENERGY 2016 GRI 305: EMISSIONS 2016 GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016
Digital Skills & Inclusion	N/A
Online Safety	N/A
Diversity, Equity & Inclusion	GRI 401: EMPLOYMENT 2016 GRI 404: TRAINING AND EDUCATION 2016 GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016
Occupational Health, Safety & Wellbeing	GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018
Forced labour	GRI 409: FORCED OR COMPULSORY LABOR 2016
Cybersecurity	N/A
Data protection	N/A
Freedom of expression & Privacy	GRI 418: CUSTOMER PRIVACY 2016
Anti-corruption	GRI 205: ANTI-CORRUPTION 2016
Responsible Supply Chain	GRI 204: PROCUREMENT PRACTICES 2016 GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016 GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016

Section Material Areas & Key Highlights 2022 of Telenor’s 2022 Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process. The company will continue focusing on risks mitigation of material areas, and how these are integrated in the operational management and including business development.

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

External Assurance

EY has carried out an independent limited assurance of Telenor’s Sustainability Report 2022 to assess the accuracy of claims. The engagement has been undertaken in accordance with the International Standards on Assurance Engagements (ISAE) 3000 (Revised) Assurance engagements Other Than Audits or Reviews of Historical financial information (“ISAE 3000 (Revised)”). Reported indicators from the following sections of the present index have also been within the scope of the assurance: GRI 3: MATERIAL TOPICS DISCLOSURES, GRI 302: ENERGY 2016; GRI 305: EMISSIONS 2016; and GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016. EY’s attestation letter can be found on <https://www.telenor.com/sustainability/reporting-our-performance/reporting-and-verification/>

TELENOR GRI INDEX REPORT 2022

Statement of use	Telenor ASA has reported in accordance with the GRI Standards for the period 1 Jan 2022 – 31 Dec 2022.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standards(s)	No sector guidelines apply

GRI	Disclosure	Location	Omission
GRI 2: GENERAL DISCLOSURES 2021			
2-1	Organizational details	Name: Telenor ASA Ownership & legal form: Articles of Association HQ location: Fornebu, Norway Countries of operation: https://www.telenor.com/about/our-companies/nordics/	
2-2	Entities included in the organization's sustainability reporting	2022 Annual report, Sustainability Report chapter, section Reporting Frameworks and Verification	
2-3	Reporting period, frequency and contact point	1 Jan 2022 – 31 Dec 2022 Frequency: Annual- aligned with financial reporting Date of publication of 2022 Annual Report: 28 March 2023 Contact point: Teodora Mitrovska-Forbord, Director Sustainability, E-mail: sustainability@telenor.com	
2-4	Restatements of information	2022 Annual Report - Sustainability Report chapter, section <i>Reporting Frameworks and Verification</i>	
2-5	External assurance	An independent limited assurance of the content of the 2022 Sustainability Report has been done by EY. Attestation letter available on https://www.telenor.com/sustainability/reporting-our-performance/reporting-and-verification/	
2-6	Activities, value chain and other business relationships	2022 Annual Report, Sustainability Report chapter, section <i>Responsible Supply Chain</i>	
2-7	Employees	2022 Annual Report, Sustainability Report chapter, Section <i>Diversity & Inclusion</i> and section <i>Key ESG Figures</i>	
2-8	Workers who are not employees	2022 Annual Report, Sustainability Report chapter, section <i>Responsible Supply Chain</i> and section <i>Health, Safety, People Security and Wellbeing</i>	
2-9	Governance structure and composition	Corporate Governance Report as part of 2022 Annual Report Corporate Governance Report as part of 2022 Annual Report, section 9 <i>The Work of the Board of Directors</i> Telenor Corporate Governance Group Leadership Team	
2-10	Nomination and selection of the highest governance body	Corporate Governance Report as part of 2022 Annual Report, section 7 <i>Nomination Committee</i>	
2-11	Chair of the highest governance body	The chairperson of Telenor's board of directors is not an executive officer. Corporate Governance Report as part of 2022 Annual Report	
2-12	Role of the highest governance body in overseeing the management of impacts	Corporate Governance Report as part of 2022 Annual Report	

GRI	Disclosure	Location	Omission
		2022 Annual report, Sustainability Report chapter, section <i>Sustainability Governance</i>	
2-13	Delegation of responsibility of managing impacts	2022 Annual report, Sustainability Report chapter, section <i>Sustainability Governance</i>	
2-14	Role of the highest governance body in sustainability reporting	2022 Annual report, Sustainability Report chapter, section <i>Sustainability Governance</i>	
2-15	Conflict of interests	Corporate Governance Report as part of 2022 Annual Report, section 9 <i>The work of the Board of Directors</i>	
		2022 Annual report, Sustainability Report chapter, section <i>Integrity Hotline</i>	
		Telenor Code of Conduct	
2-16	Communication of critical concerns	2022 Annual report, Sustainability Report chapter, section <i>Integrity Hotline</i>	
		Corporate Governance Report as part of 2022 Annual Report	
2-17	Collective knowledge of the highest governance body	Corporate Governance Report as part of 2022 Annual Report	
2-18	Evaluation of the performance of the highest governance body	Corporate Governance Report as part of 2022 Annual Report	
2-19	Remuneration policies	2022 Executive Compensation Report	
2-20	Process to determine remuneration	2022 Executive Compensation Report	
2-21	Annual total compensation ratio	2022 Executive Compensation Report	
		2022 Annual report, Sustainability Report chapter, section <i>Diversity & Inclusion</i>	
2-22	Statement on sustainable development strategy	2022 Annual report, Board of Directors Report chapter, section <i>Strategy and Key Milestones</i>	
		2022 Annual Report, Sustainability Report chapter, section <i>Strategy and Direction</i>	
2-23	Policy commitments	Our commitments are based on a wide range of standards and frameworks. These are described in the respective material areas sections of the <i>E – Environmental</i> , <i>S – Social</i> and <i>G – Governance</i> chapters in the 2022 Annual Report Sustainability Report chapter	

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		<p>Key standards followed</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>Climate and Environment</td> <td>Science Based Targets (SBTi) ISO14001</td> </tr> <tr> <td>Human Rights</td> <td>United Nations (UN) guiding principles on business and Human Rights Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work</td> </tr> <tr> <td>Diversity and Inclusion</td> <td>UN Women Empowerment Principles UN standards of business for lesbian, gay, bi, trans and intersex (LGBTI) rights Norwegian Gender Equality Reporting Requirement</td> </tr> <tr> <td>Health, Safety, People Security and Wellbeing</td> <td>ISO 45001 ILO Declaration on Fundamental Principles and Rights at Work Norwegian Working environment act §5-1</td> </tr> <tr> <td>Responsible Supply Chain</td> <td>SA 8000 ILO Declaration on Fundamental Principles and Rights at Work Norwegian Transparency Law</td> </tr> <tr> <td>Anti-corruption</td> <td>United Kingdom Bribery Act (UKBR) Foreign Corrupt Practices Act (FCPA) Norwegian law (Civil Penal Code Sections 276a-c) ISO 37001 OECD Anti-Corruption Guidelines</td> </tr> <tr> <td>Privacy & Data Protection</td> <td>General Data Protection Regulation (GDPR) OECD Guidelines The Law Enforcement Data Protection (LEPD) Directive The ePrivacy Directive (2002/58/EC)</td> </tr> <tr> <td>Cyber Security</td> <td>ISO 27001 National Institute of Standards and Technology Standard of Good Practice for Information Security</td> </tr> </tbody> </table>	Area	Standard	Climate and Environment	Science Based Targets (SBTi) ISO14001	Human Rights	United Nations (UN) guiding principles on business and Human Rights Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work	Diversity and Inclusion	UN Women Empowerment Principles UN standards of business for lesbian, gay, bi, trans and intersex (LGBTI) rights Norwegian Gender Equality Reporting Requirement	Health, Safety, People Security and Wellbeing	ISO 45001 ILO Declaration on Fundamental Principles and Rights at Work Norwegian Working environment act §5-1	Responsible Supply Chain	SA 8000 ILO Declaration on Fundamental Principles and Rights at Work Norwegian Transparency Law	Anti-corruption	United Kingdom Bribery Act (UKBR) Foreign Corrupt Practices Act (FCPA) Norwegian law (Civil Penal Code Sections 276a-c) ISO 37001 OECD Anti-Corruption Guidelines	Privacy & Data Protection	General Data Protection Regulation (GDPR) OECD Guidelines The Law Enforcement Data Protection (LEPD) Directive The ePrivacy Directive (2002/58/EC)	Cyber Security	ISO 27001 National Institute of Standards and Technology Standard of Good Practice for Information Security	
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		<p>See 2022 Annual report, Sustainability Report chapter, section <i>Human rights</i> for information on Telenor’s due diligence process.</p> <p>Telenor Code of Conduct</p>																			
2-24	Embedding policy commitments	<p>2022 Annual report, Sustainability Report chapter, section <i>Sustainability Governance</i></p> <p>Code of Conduct training – See ESG Key Figures</p>																			
2-25	Process to remediate negative impacts	<p>Telenor performed a double-materiality assessment dialogue to identify negative impacts. See 2022 Annual report, Sustainability Report chapter, section <i>Materiality Assessment</i> for mor information on what the process entailed.</p> <p>More information on hoe Telenor manages impacts can be found in the respective material areas sections of the <i>E – Environmental, S – Social and G – Governance</i> chapters in the 2022 Annual Report.</p>																			
2-26	Mechanisms for seeking advice and raising concerns	<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>2022 Annual Report, Sustainability Report chapter, section <i>Integrity Hotline</i></p>																			
2-27	Compliance with laws and regulations	<p>Telenor’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 2022 Annual Report, section Risk overview and Note 23 Legal disputes and contingencies</p>																			
2-28	Membership associations	<ul style="list-style-type: none"> • GSMA (Global Mobile Operators’ Association) • Joint Alliance for CSR (JAC) 																			

GRI	Disclosure	Location	Omission
		<ul style="list-style-type: none"> • United Nations Global Compact (UNGC) • Confederation of Norwegian Enterprise (NHO) • Nordic business Forum • UNI Global Union <p>Additional info: 2022 Annual Report, Sustainability Report chapter, section <i>Stakeholder Engagement</i></p>	
2-29	Approach to stakeholder engagement	<p>2022 Annual Report, Sustainability Report Chapter, sections <i>Stakeholder Engagement</i> and <i>Materiality Assessment</i></p> <p>Telenor Investor Relations</p>	
2-30	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.</p> <p>2022 Annual Report, Sustainability Report chapter, sub-section <i>Labour Rights and Standards</i></p>	
GRI 3: MATERIAL TOPICS DISCLOSURES			
3-1	Process to determine material topics	<p>2022 Telenor’s Annual Report, Sustainability Report chapter, Section <i>Materiality Assessment</i>. Section <i>Material Areas & Key Highlights 2022</i> in the report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p> <p>The process is also outlined in <i>Preface</i> of this GRI Content Index above.</p> <p>Indicators 3-1, 3-2 and 3-3 have been independently assured by EY as part of their limited assurance process of Telenor’s 2022 Sustainability reporting.</p>	
3-2	List of material topics	<p>2022 Annual Report, Sustainability Report chapter, Section <i>Materiality Assessment</i> – includes list of material topics as well as changes to the list of material topics compared to the previous reporting period.</p> <p>Section <i>Material Areas & Key Highlights 2022</i> in the report outlines the level of impacts, risks and opportunities for all material areas as identified by the materiality assessment process.</p> <p>List of top priority material topics is also outlined in <i>Preface</i> of this GRI Content Index above.</p>	
3-3	Management of material topics	<p>Management of Material Topics, including policies, commitments, impacts levels, actions, KPIs and strategies is provided in each Material Area chapter of the 2022 Telenor</p>	

GRI	Disclosure	Location	Omission
		Annual Report, Sustainability Report chapter, sections <i>Environmental, Social and Governance</i>	
		Section <i>Material Areas & Key Highlights 2022</i> in the report outlines the level of impacts, risks and opportunities for all material areas as identified by the materiality assessment process.	
GRI 201: ECONOMIC PERFORMANCE 2016			
201-1	Direct economic value generated and distributed	2022 Annual Report – Sustainability Report chapter, section <i>Responsible Tax Practices</i>	
201-2	Financial implications and other risks and opportunities due to climate change	Telenor’s 2022 TCFD Report 2022 Annual Report - Sustainability Report chapter, section <i>Climate</i> 2022 Annual Report – Board of Directors Report chapter, section 04. <i>Risk Overview</i>	
201-3	Defined benefit plan obligations and other retirement plans	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. 2022 Annual Report, Note 21 Pension Obligations	
201-4	Financial assistance received from government	2022 Annual Report, Notes to Financial Statements, Government Grants and 36 Note Related Parties 2022 Annual Report, Sustainability Report chapter, section <i>Responsible Tax Practices</i>	
GRI 203: INDIRECT ECONOMIC IMPACTS 2016			
203-1	Infrastructure investments and services supported	2022 Annual Report, Sustainability Report chapter, section <i>Responsible Tax Practices</i> 2022 Annual Report, Board of Directors Report chapter, section 01 <i>Creating value through purpose</i>	
203-2	Significant indirect economic impacts	2022 Annual Report, Sustainability Report chapter, section <i>Responsible Tax Practices</i>	
GRI 204: PROCUREMENT PRACTICES 2016			
3-3	Management of material topics	Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Telenor Annual Report, Sustainability Report chapter, section <i>Responsible Supply Chain</i> ; Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.	

GRI	Disclosure	Location	Omission
204-1	Proportion of spending on local suppliers	<p>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.</p> <p>Telenor carries out inspections to monitor compliance with the requirements on responsible business conduct.</p> <hr/> <p>Percentage is not discussed.</p> <p>See also: Telenor Code of Conduct , Anti-corruption</p>	<p>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</p>

GRI	Disclosure	Location	Omission
			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
GRI 205: ANTI-CORRUPTION 2016			
3-3	Management of material topics	<p>Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Telenor Annual Report, Sustainability Report chapter, section <i>Ethical Business and Anti-corruption</i>;</p> <p>Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p> <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><u>Telenor Code of Conduct</u></p> <p><u>Anti-corruption</u></p>	
205-1	Operations assessed for risks related to corruption	<p>Corruption is a threat to Telenor’s business and the societies where the company operates. It can undermine legitimate business activities, distort competition, damage reputations, and expose individuals to risk. Corruption-related risk includes bribery and trading in influence.</p> <p>A risk-based Anti-Corruption Compliance Programme to prevent, detect and remedy corruption risk is implemented in all Telenor’s subsidiaries.</p>	

GRI	Disclosure	Location	Omission
205-2	Communication and training about anti-corruption policies and procedures	<p>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 other awareness activities. 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. See also 2022 Annual Report, Sustainability Report chapter, section <i>Anti-corruption</i></p> <p>During 2022, Telenor performed more than 27,000 man-hours training of suppliers' employees covering Health, Safety and Security as well as Anti-corruption. See also: <i>Key ESG Figures</i></p> <p style="text-align: center;">Telenor Ethics and Anti-Corruption Programme</p>	
GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016			
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	2022 Annual Report, Note 23 Legal disputes and contingencies	
GRI 207: TAX 2019			
207-1	Approach to tax	2022 Annual Report 2022, Sustainability Report chapter, <i>Responsible Tax Practices</i>	
207-4	Country-by-country reporting	2022 Annual Report 2022, Sustainability Report chapter, section <i>Responsible Tax Practices</i>	
GRI 302: ENERGY 2016			
3-3	Management of material topics	<p>Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Annual Report, Sustainability Report chapter, section <i>Climate</i>;</p> <p>Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p> <p>Reported figures are for total Telenor Group in the financial year 2022.</p> <p>Indicators 302-1, 302-3 and 302-4 have been independently assured by EY as part of their limited assurance process of Telenor's 2022 Sustainability reporting.</p>	
302-1	Energy consumption within the organization	Total energy consumption in 2022 was: 2,791 GWh.	

GRI	Disclosure	Location	Omission																								
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		Please see more information about energy consumption section in the Telenor’s Annual Report 2022, Sustainability Report chapter, section <i>Climate</i> and section <i>Key ESG figures</i>																									
302-3	Energy intensity	<p>Energy intensity in Telenor’s networks in 2022: 201 MWh/Petabyte</p> <ul style="list-style-type: none"> 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 can be found in section <i>Reporting frameworks and verification</i> of Telenor’s 2022 Annual Report 2022.</p>																									
302-4	Reduction of energy consumption	<p>Reported figures are for total Telenor Group in the financial year 2022.</p> <p>Telenor’s total energy consumption was 2,791 GWh, compared to 2,542 GWh in 2021.</p> <p>In 2022, Telenor saw a stable energy consumption development in the Nordics, while in the Asian operations the energy consumption continued to grow following rapid data growth and network expansions across markets.</p> <p>See Telenor’s 2022 Annual Report, Sustainability Report chapter, section <i>Climate</i> for more information on the company’s energy consumption.</p> <p>Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used can be found in section <i>Reporting frameworks and verification</i> of Telenor’s 2022 Annual Report 2022, Sustainability Report chapter.</p>																									
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GRI	Disclosure	Location	Omission
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Section *Material Areas & Key Highlights 2022* of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.

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).

Indicators 305-1, 305-2, 305-3, 305-4 and 305-5 have been independently assured by EY as part of their limited assurance process of Telenor’s 2022 Sustainability reporting.

305-1 Direct (Scope 1) GHG emissions

Scope 1 GHG emissions (thousand tonnes CO2e): 92

Telenor reports progress towards the company’s scope 1 and 2 [Telenor’s science-based targets](#). As such, market-based factors are reported for the Nordic and the Asian operations:

Asia Scope 1 and 2 GHG emissions in 2022 (thousand tonnes CO2e): 837

Nordic Scope 1 and 2 GHG emissions in 2022 (thousand tonnes CO2e): 17

305-2 Energy indirect (Scope 2) GHG emissions

Market-based Scope 2 GHG emissions (thousand tonnes CO2e): 763

Location-based Scope 2 GHG emissions (thousand tonnes CO2e): 827

Telenor reports progress towards the company’s scope 1 and 2 [Telenor’s science-based targets](#). As such, market-based factors are reported for the Nordic and the Asian operations:

Asia Scope 1 and 2 GHG emissions in 2022 (thousand tonnes CO2e): 837

Nordic Scope 1 and 2 GHG emissions in 2022 (thousand tonnes CO2e): 17

Scope 2 – Location-based factors

	DH/DC emissions (tonnes CO2 / GWh)
Bangladesh	543.700000
Denmark	91.700000
Finland	100.800000
Norway	8.200000
Pakistan	394.500000
Sweden	32.100000
Thailand	457.800000

See 2022 Annual Report, Sustainability Report chapter, section *Key ESG figures* and section *Climate*

GRI	Disclosure	Location	Omission																																	
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: See 2022 Annual Report, Sustainability Report chapter – section <i>Key ESG figures</i> and section <i>Climate</i>																																		
		<table border="1"> <thead> <tr> <th colspan="3">Scope 3 emissions per category</th> </tr> <tr> <th>Category</th> <th>Share</th> <th>Tonnes CO2</th> </tr> </thead> <tbody> <tr> <td>Cat 01 - Standard Goods or Services</td> <td>64.2%</td> <td>1,832,954</td> </tr> <tr> <td>Cat 02 - Capital Goods</td> <td>25.8%</td> <td>735,432</td> </tr> <tr> <td>Cat 03 - Fuel and energy related</td> <td>6.1%</td> <td>175,302</td> </tr> <tr> <td>Cat 04 - Upstream transportation and distribution</td> <td>0.2%</td> <td>4,653</td> </tr> <tr> <td>Cat 06 - Business Travel</td> <td>0.1%</td> <td>2,404</td> </tr> <tr> <td>Cat 07 - Employee Commuting</td> <td>0.6%</td> <td>16,906</td> </tr> <tr> <td>Cat 11 - Use of sold products</td> <td>2.8%</td> <td>80,587</td> </tr> <tr> <td>Cat 12 - End of life of sold products</td> <td>0.2%</td> <td>4,904</td> </tr> <tr> <td></td> <td></td> <td>2,853,142</td> </tr> </tbody> </table> <p><i>Note: for Cat 01 and Cat 02: GHG Protocol and Quantis Scope 3 evaluation used in calculations</i></p>	Scope 3 emissions per category			Category	Share	Tonnes CO2	Cat 01 - Standard Goods or Services	64.2%	1,832,954	Cat 02 - Capital Goods	25.8%	735,432	Cat 03 - Fuel and energy related	6.1%	175,302	Cat 04 - Upstream transportation and distribution	0.2%	4,653	Cat 06 - Business Travel	0.1%	2,404	Cat 07 - Employee Commuting	0.6%	16,906	Cat 11 - Use of sold products	2.8%	80,587	Cat 12 - End of life of sold products	0.2%	4,904			2,853,142	
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305-4	GHG emissions intensity	Reported figures are for total Telenor Group in the financial year 2022. <ul style="list-style-type: none"> Emission intensity in Telenor’s networks in 2022 was 62 tCO2e/Petabyte GHG emissions intensity ratio for all our business units- where the ratio denominator is total revenues: 0.083 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) 																																		
305-5	Reduction of GHG emissions	Scope 1+2 GHG emissions - reduction from science-based target Baseline year 2019 (%) was 7%; Scope 1+2 GHG emissions per mobile data traffic were 62 tonnes CO2e / petabyte More information on GHG emissions reduction, see 2022 Annual Report, Sustainability Report chapter, section <i>Climate</i>																																		
GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016																																				
3-3	Management of material topics	Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Annual Report, Sustainability Report chapter, section <i>Climate</i> and <i>Responsible Supply Chain</i> ; Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.																																		

GRI	Disclosure	Location	Omission
308-1	New suppliers that were screened using environmental criteria	<p>Indicators 308-1 and 308-2 have been independently assured by EY as part of their limited assurance process of Telenor’s 2022 Sustainability reporting.</p> <p>Telenor require all suppliers to follow the <u>Supplier Conduct Principles (SCP)</u>, which encompass environmental and other sustainability requirements.</p> <p>Telenor undertakes monitoring of and follow up with business partners on their controls and practice to comply with the SCP throughout their supply chain. In addition to direct monitoring, Telenor collaborates through the industry platform Joint Alliance for CSR (JAC) to verify, assess and develop responsible business across the manufacturing centres of important multinational suppliers of the Information Communication Technology (ICT) industry. In 2022 the approach to classify and monitor high risk suppliers was streamlined across markets. While Telenor has ensured that all known high risk suppliers have been monitored during the year, calculation of the percentage for purposes of reporting against target is not produced for the year. This is because the streamlined methodology was rolled out in markets in a staged manner, leading to the challenge of data comparability.</p>	
308-2	Negative environmental impacts in the supply chain and actions taken	<p>Telenor require all suppliers to follow the <u>Supplier Conduct Principles</u> which encompassing environmental and other sustainability requirements.</p> <p>Telenor’s key risks in the supply chain relate to health and safety issues such as road accidents, working at height, electrical and fire safety.</p> <p>To manage risks within the supply chain, Telenor relies on a consistent and risk-based process tailored to their scope of work and nature of engagement. This helps identify and manage supplier SCP risks throughout the lifecycle of their relationships.</p>	Telenor does not currently report fully on this indicator.
GRI 401: EMPLOYMENT 2016			
3-3	Management of material topics	<p>Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Annual Report, Sustainability Report chapter, section <i>Diversity & Inclusion</i></p> <p>Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p>	
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	

GRI	Disclosure	Location	Omission
		<p>regulations, and the cover may vary between different employment types.</p> <p>2022 Annual Report, Sustainability Report chapter, section Diversity & Inclusion (Responsible Employer)</p>	
401-3	Parental leave	<p>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.</p> <p>2022 Annual Report, Sustainability Report chapter, section Diversity & Inclusion (Responsible Employer)</p> <p>Telenor Gender Balanced Future</p>	
GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018			
3-3	Management of material topics	<p>Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Annual Report, Sustainability Report chapter, section <i>Health, Safety, People Security and Wellbeing</i></p> <p>Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p> <p>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 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</p>	
403-1	Occupational health and safety management system	2022 Annual Report 2022, Sustainability Report chapter, section Health, Safety and Wellbeing	
403-5		2022 Annual Report 2022, Sustainability Report chapter, section Health, Safety and Wellbeing	

GRI	Disclosure	Location	Omission
	Worker training on occupational health and safety		
403-6	Promotion of worker health	2022 Annual Report 2022, Sustainability Report chapter, section Health, Safety and Wellbeing	
403-9	Work-related injuries	2022 Annual Report 2022, Sustainability Report chapter, section Health, Safety and Wellbeing	
403-10	Work-related ill health	2022 Annual Report 2022, Sustainability Report chapter, section Health, Safety and Wellbeing	
GRI 404: TRAINING AND EDUCATION 2016			
3-3	Management of material topics	<p>Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Annual Report, Sustainability Report chapter, section <i>Diversity & Inclusion</i></p> <p>Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p> <p>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.</p> <p>Responsibility of tracking policy requirements, goals and targets lies with the line management. Group HR functions oversee the process.</p>	
404-2	Programs for upgrading employee skills and transition assistance programs	<p>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.</p> <p>Telenor Learning and Development</p>	
404-3	Percentage of employees receiving regular performance and career development reviews	<p>All employees shall receive regular performance and career development reviews regardless of category and gender. This is a global group requirement.</p>	
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016			
3-3	Management of material topics	<p>Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Annual Report, Sustainability Report chapter, section <i>Diversity & Inclusion</i></p> <p>Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p>	

GRI	Disclosure	Location	Omission
405-1	Diversity of governance bodies and employees	Corporate Governance Report as part of 2022 Annual Report	
405-2	Ratio of basic salary and remuneration of women to men	2022 Annual Report, Sustainability Report chapter, section <i>Diversity & Inclusion</i> Telenor Equality and Gender Pay	
GRI 406: NON-DISCRIMINATION 2016			
3-3	Management of material topics	Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Annual Report, Sustainability Report chapter, section <i>Human Rights</i> Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.	
406-1	Incidents of discrimination and corrective actions taken	2022 Annual Report 2022, Sustainability Report chapter, section <i>Integrity Hotline</i>	
GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING 2016			
3-3	Management of material topics	Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Annual Report, Sustainability Report chapter, section <i>Human Rights</i> Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.	
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	These principles relate to respecting the rights to freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour, the elimination of discrimination in respect of employment and occupation, and a safe and healthy working environment, and are reflected in Telenor's Code of Conduct, Group People Policy, and Supplier Conduct Principles. Telenor complies with applicable laws and regulations and if there are differences between such laws and regulations and the standards set out in the company's Code of Conduct, Telenor will apply the higher standard consistent with applicable local laws. 2022 Annual Report, Sustainability Report chapter, section <i>Human Rights</i> and section <i>Responsible Supply Chain</i>	
GRI 408: CHILD LABOUR 2016			
3-3	Management of material topics	Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Annual Report, Sustainability Report chapter, section <i>Human Rights</i>	

GRI	Disclosure	Location	Omission
408-1	Operations and suppliers at significant risk for incidents of child labor	<p>Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p> <p>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.</p> <p>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.</p> <p>Incidents in these areas shall be reported immediately and corrective actions are required at once.</p> <p>We also include this in training & awareness sessions/supplier conferences organised locally.</p> <p>See more: 2022 Annual Report, Sustainability Report chapter, sections <i>Human Rights, Responsible Supply Chain</i> and <i>Key ESG Figures</i></p> <p>Telenor Supply Chain Sustainability</p>	
GRI 409: FORCED OR COMPULSORY LABOR 2016			
3-3	Management of material topics	<p>Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Telenor Annual Report, section <i>Human Rights</i></p> <p>Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p>	
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	<p>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.</p> <p>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.</p> <p>Incidents in these areas shall be reported immediately and corrective actions are required at once.</p> <p>We also include this in training & awareness sessions/supplier conferences organised locally.</p> <p>See: 2022 Annual Report, Sustainability Report chapter, sections <i>Human Rights, Responsible Supply Chain</i> and <i>Key ESG Figures</i></p> <p>Telenor Supply Chain Sustainability</p>	

GRI	Disclosure	Location	Omission
GRI 410: SECURITY PRACTICES 2016			
410-1	Security personnel trained in human rights policies or procedures	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.
GRI 411: RIGHTS OF INDIGENOUS PEOPLES 2016			
411-1	Incidents of violations involving rights of indigenous peoples	In 2022 we are not aware of any reported incidents	
GRI 413: LOCAL COMMUNITIES 2016			
413-1	Operations with local community engagement, impact assessments, and development programs	Omission: disclosure of percentage of operations with implemented local community engagement, impact assessments and/or development programmes. See: 2022 Annual Report, Sustainability Report chapter, section <i>Digital Skills</i>	Reason for omission: Not applicable. We do not report on percentage of operations, but provide detailed information

GRI	Disclosure	Location	Omission
			of impact assessments and programmes, local community development programmes.
413-2	Operations with significant actual and potential negative impacts on local communities	<p>See: 2022 Annual Report, Sustainability Report chapter, section <i>Digital Skills</i></p> <p>For a description of negative and positive impact levels, see 2022 Annual Report, Sustainability Report chapter, section <i>2022 Material areas & Key Highlights</i></p> <p>Digital inclusion and diversity</p>	<p>Reason for omission: Not applicable. We do not report on percentage of operations, but provide detailed information of impact assessments and programmes, local community development programmes.</p>
GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016			
3-3	Management of material topics	<p>Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Annual Report, Sustainability Report chapter, section <i>Responsible Supply Chain</i></p> <p>Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p> <p>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.</p> <p>Telenor carries out inspections to monitor compliance with the requirements on responsible business conduct.</p>	
		Telenor Supply Chain Sustainability	
414-1	New suppliers that were screened using social criteria	Telenor require all suppliers to follow the Supplier Conduct Principles (SCP), which encompass social and other sustainability requirements.	

GRI	Disclosure	Location	Omission
		Telenor undertakes monitoring of and follow up with business partners on their controls and practice to comply with the SCP throughout their supply chain. In addition to direct monitoring, Telenor collaborates through the industry platform Joint Alliance for CSR (JAC) to verify, assess and develop responsible business across the manufacturing centres of important multinational suppliers of the Information Communication Technology (ICT) industry. In 2022 the approach to classify and monitor high risk suppliers was streamlined across markets. While Telenor has ensured that all known high risk suppliers have been monitored during the year, calculation of the percentage for purposes of reporting against target is not produced for the year. This is because the streamlined methodology was rolled out in markets in a staged manner, leading to the challenge of data comparability.	
414-2	Negative social impacts in the supply chain and actions taken	During 2022, Telenor has recorded 0 cases of underage labour (15-18 years) involving hazardous work or child labour (12-14 years) in the supply chain.	
GRI 418: CUSTOMER PRIVACY 2016			
3-3	Management of material topics	Management of this material topic, including policies, commitments, impacts, actions, KPIs and strategies is provided in 2022 Annual Report, Sustainability Report chapter, section <i>Privacy & Data Protection</i>	
		Section <i>Material Areas & Key Highlights 2022</i> of the 2022 Telenor Annual Report outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	2022 Annual Report, Sustainability Report chapter, section <i>Privacy & Data Protection</i> .	
		2022 Authority Requests Report	
		Telenor Privacy and Data Protection	
TELENOR DEFINED MATERIAL TOPICS			
N/A	Digital Skills	Please see our response to GRI indicator 3-3 above; and Telenor Annual Report 2022, Sustainability Report chapter, section <i>Digital Skills</i> ; Section <i>Material Areas & Key Highlights 2022</i> outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.	
		Building skills for an accelerated digital future	
N/A	Cyber security	Please see our response to GRI indicator 3-3 above; and Telenor Annual Report 2022, Sustainability Report chapter, section <i>Cyber security</i> ;	

GRI	Disclosure	Location	Omission
		<p>Section Material Areas & Key Highlights 2022 outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p> <p>Telenor Cyber security</p> <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>	
N/A	Privacy & Data Protection	<p>Please see our response to GRI indicator 3-3 above; and Telenor Annual Report 2022, Sustainability Report chapter, section <i>Privacy & Data Protection</i>;</p> <p>Section Material Areas & Key Highlights 2022 outlines the level of impacts, risks and opportunities as identified by the materiality assessment process.</p> <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. 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 Privacy and Data Protection</p>	