

Telenor SASB Report

2021



telenor group

Topic	CODE	METRIC	Telenor's response
Environmental Footprint of Operations	TC-TL-130a.1	1) Total energy consumed	12 042 000 GJ. Equal to 3 345GWh of energy.
		2) Percentage grid electricity	80%. A total of 2 688GWh of electricity is sourced through the grid.
		3) Percentage renewable	21%. Telenor group has sourced 679GWh of renewable electricity through national electricity grids. All grid based renewable electricity has been purchased in our Nordic operations via Guarantee of Origin Certificates. A remaining 26GWh of renewable electricity has been generated via off-grid solutions.
Data Privacy	TC-TL-220a.1	Description of policies and practices relating to behavioural advertising and customer privacy	Telenor Group Privacy governance is part of our commitment to Responsible Business. A description can be found on our corporate website at https://www.telenor.com/sustainability/responsible-business/privacy-governance/ Telenor is a diverse group of companies, operating in different markets across Europe and Asia. Each Telenor company is its own data controller and disclose their privacy practices on the respective company's website as part of their privacy statement.
	TC-TL-220a.2	Number of customers whose information is used for secondary purposes	Telenor Group companies may only use customer data for defined and lawful purposes in accordance with current legislation and our internal Group Privacy Policy. Any further use of customer data for secondary purposes may happen in anonymised form, only.
	TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	0
	TC-TL-220a.4	1) Number of law enforcement requests for customer information 2) Number of customers whose information was requested 3) Percentage resulting in disclosure	Telenor's Authority Requests Disclosure reports are available here: Handling access requests from authorities - Telenor Group
Data Security	TC-TL-230a.1	1) Number of data breaches 2) Percentage involving personally identifiable information (PII), 3) Number of customers affected	Telenor Group do not report this indicator as details around data breaches are confidential. Global companies, such as Telenor Group, are at constant risk of cyber-attacks. While we are constantly increasing our efforts to actively protect our networks, products and customer data, advanced threat actors are increasingly aiming to steal information, modify customer data or make our services unavailable. Specific details associated with security incidents are subject to national laws and regulation and confidential, as to not compromise the integrity of ongoing and future investigations. During 2021, Telenor Norway has pro-actively mitigated against various fraud types towards its mobile subscribers, through technical counter-measures and awareness campaigns on customers portals, ref. online.no . For more information on Telenor's commitment to cyber security, refer to Telenor's Cyber Security page .

	TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Telenor Group 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. This includes a number of actions related to preventive controls, including monitoring and detection, vulnerability assessments and incident management and response across all our business units. Read more on how we work with cyber security on Telenor.com and our public position on cyber security . Please see answer to TC-TL-550a.2 for more details on our use of third-party standards.
Product End-of-Life Management	TC-TL-440a.1	1) Materials recovered through take back programmes	524 010 devices. Telenor Group reports the number of devices returned through take back programmes in the Nordic business units and dtac. These consist of mobile devices, such as smartphones and fixed CPE devices, such as TV boxes and broadband routers. A total of 158 047 mobile devices were returned through take-back programmes of which 87% were reused and 13% were recycled. A total of 365 963 fixed devices were returned through take-back programmes of which 80% were re-used and 20% were recycled.
		2) Percentage recovered materials reused	83 %
		3) Percentage recovered materials recycled	17%
		4) Percentage recovered materials landfilled	0%
Competitive Behaviour and Open Internet	TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations	NOK 788 million. The case relates to an alleged breach of the prohibition against abuse of a dominant position related to the pricing model in one mobile wholesale agreement in the mobile market in the period 2010-2014. The NCA's concern relates to the roll-out of the third mobile network in Norway. On 21 June 2018, the NCA issued a decision where it imposed a fine of NOK 788 million. Telenor appealed the decision to the Competition Complaint Board on 20 December 2018. In a decision from 19 June 2019, the Competition Complaint Board sustained the NCA fine, but with a split decision. Telenor appealed the decision by the Competition Complaint Board to the Gulating Court of Appeal on 18 September 2019 and the court proceeding took place in January and February 2021. On 24 June 2021, the Gulating Court of Appeal gave a ruling where they upheld the decision from NCA and the Competition Complaint Board. Telenor appealed the ruling to the Supreme Court on 3 September 2021. On 26 November 2021, the Supreme Court rejected the appeal. The case is thereby closed, and Telenor paid the fine in December 2021.

	TC-TL-520a.2	Average sustained download speed of 1) owned and commercially associated content and 2) non-associated content	13 Mbps, Group average DL throughput per user mobile network 4G.
	TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating and related practices	Legislation on net neutrality, paid peering, zero rating and related practices vary according to the markets where we operate. Telenor Group complies with the applicable legislations in each and every one of them. The preliminary ruling of the European Court of Justice in September 2021 and the awaited guidelines from BEREC will likely reduce the flexibility of Telenor Group's European business units to provide zero-rated tariffs.
Managing Systemic Risks from Technology Disruptions	TC-TL-550a.1	<ol style="list-style-type: none"> 1) System average interruption frequency 2) Customer average interruption duration 	<p>Telenor Group is currently not reporting this indicator. Our approach to managing systemic risks includes both preventive and corrective actions to avoid major service interruptions and to limit impact to our customers.</p> <p>The Telenor Risk management policy ensures that risks in Telenor are identified, assessed, and treated in a way that supports Telenor in achieving our ambitions and goals.</p> <p>The Telenor Technology policy ensures that Telenor Group is compliant to regulations including security and privacy, enabled through technology design and solutions including guidelines on improving operations.</p> <p>Through the Touch Free Operation ambition Telenor Group drives a continuous improvement process to increase automation, operating quality and to better support business and improve customer experience.</p>
	TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	<p>The main business continuity risks associated with technology are technical failures, cyber-attacks, or weather events.</p> <p>The main measures applied to mitigate Business continuity risks from the three main areas include:</p> <ul style="list-style-type: none"> • Regular assessment and measurement on service operations according to the Telenor Technology Operation manual, including Internal Audits. • Implementing security capabilities to prevent and reduce the effect of a range of threats to protect the confidentiality, integrity of customer data and internal business information and the availability of services. • Yearly benchmarking process level against ISO27001 and capabilities for monitoring and detection. To support incident management and response is measured and developed through SOC-CMM across Telenor business units to mitigate threats. <p>In the event of major incidents, the Group Manual Crisis management as well as Crisis management plan (CMP) & processes is followed. The CMP is updated on a yearly basis.</p> <p>Furthermore, Telenor Group holds a global cyber security insurance program "Professional Indemnity and Cyber Insurance Program" that offers coverage for Telenor's own costs and losses as well as third party legal liability, in areas such as data protection fines and liabilities, cyber response and cyber extortion, and network interruption.</p>

Activity Metrics	TC-TL-000.A	Number of wireless subscribers	172 million excluding Myanmar. In Myanmar: 16 million.
	TC-TL-000.B	Number of wireline subscribers	0.3 million. Nordic only.
	TC-TL-000.C	Number of broadband subscribers	2.2 million. Nordic only. Including Fixed wireless access subscribers.
	TC-TL-000.D	Network traffic (Petabyte)	13 428 PB. Mobile network only.

Reporting Boundaries

Figures related to Myanmar are included unless otherwise stated, aligned with the sustainability report.