

# GRI Report 2017



# Telenor Group Report 2017

## GRI Sustainability Reporting Standards

'In accordance – Core'



### Preface

Telenor Group supports the Global Reporting Initiative (GRI) – as an Organisational Stakeholder – and its initiatives to drive sustainability reporting. Telenor Group reports – and has done so since 2002 – in accordance with the GRI Sustainability Reporting Guidelines. The 2017 report applies the GRI Sustainability Reporting Standards.

This report has been prepared in accordance with the GRI Standards' Core option, with an in-depth and targeted reporting on the most material topics to Telenor. Scope of the reporting is Telenor ASA and all Telenor's subsidiaries directly or indirectly controlled by Telenor ASA ("business units").

In 2015, Telenor Group, through the support of EY, undertook a comprehensive update and review of its materiality assessment to better reflect current stakeholder concerns and the company's key sustainability risks and opportunities. The assessment was conducted in accordance with the Global Reporting Initiative G4 principles for defining report content through the following key steps; identification, prioritisation and validation. The materiality process is regularly revised through internal workshops and meetings within Telenor to adapt for changes in context, risk and stakeholder feedback. More details on the materiality assessment process can be found [here](#).

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

### External Assurance

An independent assurance of the content of this report has been done for the information regarding energy consumption and climate emissions. The assurance has been done by DNV-GL Business Assurance.

### References in the column UN Global Compact

Principle 1-10: UN Global Compact Advanced Communication on Progress (COP)

SDG 1-17: Sustainable Development Goals

## TELENOR GRI CONTENT INDEX 2017

GRI standard	Standard disclosure	Telenor response	UN Global Compact
GRI 101 Foundation 2017	GRI 101 does not include any disclosures		
GRI 102 General Disclosures 2017			
<b>1. ORGANIZATIONAL PROFILE</b>			
102-1	Name of the organization	Telenor Group	
102-2	Activities, brands, products, and services	<a href="http://www.telenor.com/about-us/our-business/">http://www.telenor.com/about-us/our-business/</a>	
102-3	Location of headquarters	Fornebu, Norway	
102-4	Location of operations	<a href="#">Telenor Annual Report 2017-Segment information</a> -p.59 and <a href="http://www.telenor.com/about-us/global-presence/">http://www.telenor.com/about-us/global-presence/</a>	
102-5	Ownership and legal form	<a href="http://www.telenor.com/about-us/corporate-governance/articles-of-association/">http://www.telenor.com/about-us/corporate-governance/articles-of-association/</a>	
102-6	Markets served	<a href="#">Telenor Annual Report 2017-Segment information</a> -p.59 and <a href="http://www.telenor.com/about-us/our-business/">http://www.telenor.com/about-us/our-business/</a>	
102-7	Scale of the organization	<a href="#">Telenor Annual Report 2017</a> – p.10 - 21	
102-8	Information on employees and other workers	Reported key figures 2017 from Group People <a href="http://www.telenor.com/sustainability/reporting/key-figures/#people-organisation">http://www.telenor.com/sustainability/reporting/key-figures/#people-organisation</a> -and see Country by Country Report <a href="#">Telenor Group Sustainability Report 2017</a> – p.33	
102-9	Supply chain	<a href="#">Telenor Group Sustainability Report 2017</a> – p.14-17, also outlined online: <a href="http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/">http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/</a>	
102-10	Significant changes to the organization and its supply chain	<a href="#">Telenor Annual Report 2017-Segment information</a> -p.59 and <a href="#">Report form the Board of Directors 2017</a> p.10-21 <a href="#">Telenor Annual Report 2017</a> - p.79; Acquisitions and disposals	
102-11	Precautionary Principle or approach	<a href="#">Telenor Annual Report 2017</a> - Note 18; p.91; Financial risk management <a href="#">Telenor Code of Conduct</a>	
102-12	External initiatives	The most important social charters, principles, or other initiatives to which Telenor subscribes or endorses are: <ul style="list-style-type: none"> <li>• UN Global Compact</li> <li>• UN Global Goals for Sustainable Development</li> <li>• GRI</li> <li>• CDP (former Carbon Disclosure Project)</li> <li>• Principles of the World Economic Forum</li> <li>• Telecommunications Industry Dialogue on Freedom of Expression and Privacy</li> </ul> <a href="http://www.telenor.com/sustainability/reporting/our-performance/">http://www.telenor.com/sustainability/reporting/our-performance/</a> and <a href="#">Telenor's latest alignment with the Industry Dialogue Guiding Principles</a>	
102-13	Membership of associations	<ul style="list-style-type: none"> <li>• GSMA (Global Mobile Operators' Association)</li> <li>• Global e-Sustainability Initiative (GeSI)</li> <li>• Joint Audit Committee (JAC)</li> </ul>	

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		<ul style="list-style-type: none"> <li>• United Nations Global Compact (UNGC)</li> <li>• Confederation of Norwegian Enterprise (NHO)</li> <li>• Child Labour Platform (CLP)</li> <li>• UNI Global Union</li> </ul>	
<b>2. STRATEGY</b>			
102-14	Statement from senior decision-maker	<a href="#">Telenor Group Sustainability Report 2017</a> - p.4 and online <a href="http://www.telenor.com/sustainability/">http://www.telenor.com/sustainability/</a>	
<b>3. ETHICS AND INTEGRITY</b>			
102-16	Values, principles, standards, and norms of behavior	<p>Telenor has zero tolerance on corruption and Telenor's ethical standards promote proper business practices and reflect relevant laws, regulations and internationally recognised standards.</p> <p>Integrity is a vital part of Telenor's business. Telenor's management is committed to sending clear, unambiguous and regular messages to all staff and business partners that corruption and bribery are unacceptable. Telenor's governing documents set one single standard which shall govern all business activities, regardless of where such activities take place.</p> <p><a href="https://www.telenor.com/about-us/corporate-governance/anti-corruption/">https://www.telenor.com/about-us/corporate-governance/anti-corruption/</a></p>	Principle 10 SDG 16
102-17	Mechanisms for advice and concerns about ethics	<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). Group Internal Audit &amp; Investigation is conducting the investigations and fact finding for the reported concerns.</p> <p>In 2017, Telenor logged 911 incoming compliance reports – where one third of these compliance incidents were substantiated.</p> <p>All Compliance Incidents shall be handled by the relevant Ethics &amp; Compliance Officer in accordance with Group requirements for handling of Compliance Incidents. The Board of Directors shall take all action it considers appropriate to investigate any violations. If a violation has occurred, Telenor will take such disciplinary or preventive actions, as it deems appropriate.</p> <p><a href="#">Integrity Hotline</a>  <a href="#">Telenor Group Sustainability Report 2017</a> p 11 and 12.</p>	Principle 10 SDG 16
<b>4. GOVERNANCE</b>			
102-18	Report the governance structure of the organization, including committees of the highest governance body. Committees responsible for	<a href="#">Telenor Group Corporate Governance Report 2017</a> <a href="#">Corporate Governance</a> and <a href="#">Group Executive Management</a>	

GRI standard	Standard disclosure	Telenor response	UN Global Compact
	decision-making on economic, environmental, and social topics.		
<b>5. STAKEHOLDER ENGAGEMENT</b>			
102-40	List of stakeholder groups	Stakeholders engaged for materiality matrix include policy makers, investors, employees, community & media, customers and NGOs- outlined online: <a href="http://www.telenor.com/corporate-responsibility/reporting/scope-and-principles/">http://www.telenor.com/corporate-responsibility/reporting/scope-and-principles/</a>	
102-41	Collective bargaining agreements	For practical reasons all employees in Telenor in Norway are covered by collective agreement, either directly as member of a recognised union in Telenor or indirectly as non-union member based on the legal principle of invariability. In the rest of European region there are recognised unions with collective agreements in 4 additional of our total 7 operations. In Asia there is a recognized union with collective agreement in our Malaysian operation. Based on organizational data from Norway, Serbia and Malaysia, at least 25% of all employees in Telenor Group are covered by collective bargaining agreements.	SDG 8
102-42	Identifying and selecting stakeholders	<a href="#">Reporting Scope and Principles</a>	
102-43	Approach to stakeholder engagement	<a href="#">Telenor Group Sustainability Report 2017</a> - p.9 and <a href="#">Telenor Annual Report 2017</a> – p.25 <a href="#">Telenor Youth Forum - TYF</a> <a href="#">Telenor Investor Relations Stakeholder Engagement</a> <a href="#">Telenor Materiality Assessment Sustainability Briefing Myanmar 2018</a>	
102-44	Key topics and concerns raised	This is outlined in Telenor's materiality assessment process. <a href="#">Telenor Materiality Assessment</a> <a href="#">Telenor Group Sustainability Report 2017</a> - p.9	
<b>6. REPORTING PRACTICE</b>			
102-45	Entities included in the consolidated financial statements	<a href="#">Telenor Annual Report 2017</a> - p.48 and p.59 <a href="#">Reporting our Performance</a>	
102-46	Defining report content and topic Boundaries	Approach to defining report content and materiality matrix is outlined online: <a href="http://www.telenor.com/corporate-responsibility/reporting/scope-and-principles/">http://www.telenor.com/corporate-responsibility/reporting/scope-and-principles/</a>	
102-47	List of material topics	<b>Telenor's material aspects</b> <ul style="list-style-type: none"> <li>• Human rights</li> <li>• Ethics and anti-corruption</li> <li>• Privacy and data security</li> <li>• Corporate governance</li> <li>• Service reliability and quality</li> <li>• Supply chain sustainability</li> <li>• Digital access and outreach</li> <li>• Transparency and stakeholder</li> </ul>	

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		engagement <ul style="list-style-type: none"> <li>• Labour rights and standards</li> <li>• Economic contribution to society</li> <li>• Child online safety</li> <li>• Innovating and researching for shared value</li> <li>• Environment and Climate Change</li> <li>• Mobiles phones and health</li> </ul> <a href="#">Telenor Group Materiality Matrix</a>	
102-48	The effect of any restatements of information given in previous reports, and the reasons for such restatements.	<a href="http://www.telenor.com/corporate-responsibility/reporting/key-figures/">http://www.telenor.com/corporate-responsibility/reporting/key-figures/</a> It states that the International Energy Agency (IEA) has changed its methodology for estimating country-specific indicators for CO2 emissions related to electricity production	
102-49	Changes in reporting	Telenor India is no longer part of reporting scope	
102-50	Reporting period	Calendar year 2017	
102-51	Date of most recent report	Previous report published in 2017, covering calendar year 2016.	
102-52	Reporting cycle	Annual	
102-53	Contact point for questions regarding the report	Jan Kristensen / Eyvind Lome E-mail: <a href="mailto:sustainability@telenor.com">sustainability@telenor.com</a>	
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option	
102-55	GRI content index	The GRI index can be found here: <a href="http://www.telenor.com/sustainability/reporting/gri-index/">http://www.telenor.com/sustainability/reporting/gri-index/</a>	
102-56	External assurance	An independent assurance of the content of this report has been done for the information regarding energy consumption and climate emissions. The assurance has been done by DNV-GL Business Assurance.	
<b>GRI 103: MANAGEMENT APPROACH 2017</b>			
103-1	Explanation of the material topic and its Boundary	See separate report page 16 in this document	
103-2	The management approach and its components	See separate report page 16 in this document	
103-3	Evaluation of the management approach	See separate report page 16 in this document	
<b>GRI 201: ECONOMIC PERFORMANCE 2017</b>			
201-1	Direct economic value generated and distributed	<a href="#">Telenor Annual Report 2017</a> - p.42	SDG 2, 5, 7, 8, 9, 10
201-2	Financial implications and other risks and opportunities due to climate change	In terms of climate-related regulator risks, Telenor may face higher operational costs related to carbon taxes, rising energy prices and internationally binding agreements. Climate-related physical risks may cause disruptions or catastrophic damage to infrastructure, such as network base stations and electrical power lines. <a href="#">Telenor Group Sustainability Report 2017</a> - p.21	Principle 7



GRI standard	Standard disclosure	Telenor response	UN Global Compact
201-3	Defined benefit plan obligations and other retirement plans	<a href="#">Telenor Annual Report 2017</a> - note 25 - Pension obligations - p.85-87 and Remuneration principles p.101	
<b>GRI 203: INDIRECT ECONOMIC IMPACTS 2017</b>			
203-1	Infrastructure investments and services supported	<a href="#">Telenor Group Sustainability Report 2017</a> - p.30 How Telenor impact societies	SDG 2, 5, 7, 9, 10, 11
203-2	Significant indirect economic impacts	<a href="#">Telenor Annual Report 2017</a> - p. 26 Innovating and Researching for Shared Value and page 32 Economic Contribution to Society	SDG 1, 2, 3, 8, 10, 17
<b>GRI 204: PROCUREMENT PRACTICES 2017</b>			
204-1	Proportion of spending on local suppliers	<p>Identified omission: Percentage is not disclosed. 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 to trust our selection processes.</p> <p>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.</p> <p>See also: <a href="http://www.telenor.com/about-us/corporate-governance/code-of-conduct/">http://www.telenor.com/about-us/corporate-governance/code-of-conduct/</a> and section "Ethics and anti-corruption" on page 10 in <a href="#">Telenor Group Sustainability Report 2017</a></p>	SDG 1, 5, 8, 10
<b>GRI 205: ANTI-CORRUPTION 2017</b>			
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.</p> <p>The Telenor Group's commitment to integrity and transparency is clearly stated in Telenor's Code of Conduct. The Code of Conduct is owned and approved by the Board, and all employees are required to sign it.</p> <p>A description of Telenor's Anti-Corruption Programme and the Ethics and Compliance function is publicly available on the web sites: <a href="https://www.telenor.com/about-us/corporate-governance/ethics-compliance/">https://www.telenor.com/about-us/corporate-governance/ethics-compliance/</a> and <a href="https://www.telenor.com/about-us/corporate-governance/anti-corruption/">https://www.telenor.com/about-us/corporate-governance/anti-corruption/</a></p>	Principle 10 SDG 16

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		<p>The Integrity Hotline is a confidential channel where anyone can ask questions and raise concerns about possible breaches of Telenor’s Code of Conduct, including relevant laws, regulations and governing documents.</p> <p>See also <a href="#">Telenor Annual Report 2017</a> p. 26 and <a href="#">Telenor Group Sustainability Report 2017</a>-p.10</p> <p>Integrity is a vital part of Telenor’s business. We recognize that our business partners, whether new investments, partners, agents, consultants, contractors or suppliers, will be associated with Telenor. It is crucial to ensure that Telenor’s business partners are in compliance with our ethical standards. Telenor has implemented mandatory requirements for screening and conducting integrity due diligence assessments of our business partners.</p> <p>During 2017, Telenor performed more than 23,000 Man-hours training of suppliers’ employees covering Occupational, Health, Safety and Security as well as Anti-corruption. At the end of 2017, 100% of all our about 23,500 suppliers are covered by an agreement on Supplier Conduct Principles that set out the minimum standards that we expect to see achieved over time, including on ethics and anti-corruption. See also: <a href="#">Key figures</a></p>	
<b>GRI 206: ANTI-COMPETITIVE BEHAVIOR 2017</b>			
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	<a href="#">Telenor Annual Report 2017</a> –p.98; Note 33; Legal disputes and contingencies	
<b>GRI 302: ENERGY 2017</b>			
302-1	Energy consumption within the organization	<p>For the indicators 302-1, 302-3 and 302-4; Telenor’s total GHG emissions and energy consumptions for 2017 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.</p> <p>See also: <a href="http://www.telenor.com/sustainability/reporting/key-figures/climate-change/">http://www.telenor.com/sustainability/reporting/key-figures/climate-change/</a></p> <p>Reported figures are for total Telenor Group (ex India) in the financial year 2017.</p> <ul style="list-style-type: none"> <li>• Total fuel consumption from non-renewable sources: 1037 GWh</li> <li>• Total electricity consumption: 2137 GWh</li> <li>• Total heating/cooling consumption: 9 GWh</li> </ul>	Principle 7, 8, 9 SDG 10, 13



GRI standard	Standard disclosure	Telenor response	UN Global Compact
		<ul style="list-style-type: none"> <li>Total energy consumption: 3183 GWh</li> <li>Telenor did not sell any electricity or heating/cooling during 2017.</li> <li>Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP.</li> </ul>	
302-3	Energy intensity	<p>Reported figures are for total Telenor Group (ex India) in the financial year 2017.</p> <ul style="list-style-type: none"> <li>Energy intensity ratio for all our business units- where the ratio denominator is total revenues: 211 GWh/billion USD</li> <li>All our reported fuel, electricity, heating/cooling consumptions are included in the energy intensity ratio.</li> <li>The reported ratio uses energy consumed both within and outside the Telenor organization.</li> <li>Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: <a href="http://www.telenor.com/sustainability/reporting/our-performance/">http://www.telenor.com/sustainability/reporting/our-performance/</a></li> </ul>	Principle 7, 8, 9 SDG 10, 13
302-4	Reduction of energy consumption	<p>Reported figures are for total Telenor Group (ex India) in the financial year 2017.</p> <ul style="list-style-type: none"> <li>The total amount of energy consumption has <u>increased with 624 GWh</u> as a net effect after initiatives to reduce emissions but with increased business scope (more customers and more data traffic). This includes new business units in Bulgaria and Myanmar since 2013 – but excludes India (sold in 2017).</li> <li>All our reported fuel, electricity, heating/cooling consumptions are included in the reported energy reduction figure.</li> <li>Baseline/base year: 2559 GWh in 2013</li> <li>Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: <a href="http://www.telenor.com/sustainability/reporting/our-performance/">http://www.telenor.com/sustainability/reporting/our-performance/</a></li> </ul>	Principle 7, 8, 9 SDG 10, 13
<b>GRI 305: EMISSIONS 2017</b>			
305-1	Direct (Scope 1) GHG emissions	For the indicators 305-1, 305-2, 305-3, 305-4 and 305-5; Telenor's total GHG emissions and energy consumptions for 2017 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.	Principle 7, 8, 9 SDG 10, 13

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		<p>See also:  <a href="http://www.telenor.com/sustainability/reporting/key-figures/climate-change/">http://www.telenor.com/sustainability/reporting/key-figures/climate-change/</a></p> <p>Reported figures are for total Telenor Group (ex India) in the financial year 2017.</p> <ul style="list-style-type: none"> <li>• Total gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent for all our business units: 0.225 million tonnes</li> <li>• Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: <a href="http://www.telenor.com/sustainability/reporting/our-performance/">http://www.telenor.com/sustainability/reporting/our-performance/</a></li> <li>• 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).</li> </ul>	
305-2	Energy indirect (Scope 2) GHG emissions	<p>Reported figures are for total Telenor Group (ex India) in the financial year 2017.</p> <ul style="list-style-type: none"> <li>• Total gross energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent for all our business units: 0.819 million tonnes (location based)</li> <li>• Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: <a href="http://www.telenor.com/sustainability/reporting/our-performance/">http://www.telenor.com/sustainability/reporting/our-performance/</a></li> <li>• 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).</li> </ul>	Principle 7, 8, 9 SDG 10, 13
305-3	Other indirect (Scope 3) GHG emissions	<p>Reported figures are for total Telenor Group (ex India) in the financial year 2017.</p> <ul style="list-style-type: none"> <li>• Total gross other indirect (Scope 3) GHG emissions in metric tons of CO2 equivalent for all our business units: 0.022 million tonnes</li> <li>• Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: <a href="http://www.telenor.com/sustainability/reporting/our-performance/">http://www.telenor.com/sustainability/reporting/our-performance/</a></li> <li>• 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).</li> </ul>	Principle 7, 8, 9 SDG 10, 13

GRI standard	Standard disclosure	Telenor response	UN Global Compact
305-4	GHG emissions intensity	<p>Reported figures are for total Telenor Group (ex India) in the financial year 2017.</p> <ul style="list-style-type: none"> <li>• GHG emissions intensity ratio for all our business units- where the ratio denominator is total revenues: 0.066 million tonnes CO2/ billions of USD</li> <li>• All our reported fuel, electricity, heating/cooling consumptions are included in the GHG emissions intensity ratio.</li> <li>• The reported ratio uses GHG emissions from both direct (Scope 1), energy indirect (Scope 2), other indirect (Scope 3).</li> <li>• Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: <a href="http://www.telenor.com/sustainability/reporting/our-performance/">http://www.telenor.com/sustainability/reporting/our-performance/</a></li> </ul>	Principle 7, 8, 9 SDG 10, 13
305-5	Reduction of GHG emissions	<p>Reported figures are for total Telenor Group (ex India) in the financial year 2016.</p> <ul style="list-style-type: none"> <li>• The total amount of GHG emissions has <u>increased</u> with 0.337 metric tonnes CO2 equivalent as a net effect after initiatives to reduce emissions but with increased business scope (more customers and more data traffic). This includes new business units in Bulgaria and Myanmar since 2013 – but excludes India (sold in 2017).</li> <li>• Baseline/base year: 0.729 million tonnes CO2 in 2013</li> <li>• Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: <a href="http://www.telenor.com/sustainability/reporting/our-performance/">http://www.telenor.com/sustainability/reporting/our-performance/</a></li> </ul> <p>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).</p>	Principle 7, 8, 9 SDG 10, 13
<b>GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2017</b>			
308-1	New suppliers that were screened using environmental criteria	<p><a href="#">Telenor Group Sustainability Report 2017</a> - p.22</p> <p>In 2017, in more than 60 % of our procurement processes with contract value larger than USD 250,000 we have screened new suppliers using a specified set of sustainability criteria.</p>	Principle 7, 8, 9 SDG 13
<b>GRI 401: EMPLOYMENT 2017</b>			
401-2	Benefits provided to full-time employees that are not provided	<p>Practices related to Norwegian entities:</p> <p>As a general principle Telenor is offering equal benefits, to full-time, part-time and temporary</p>	Principle 6 SDG 8

GRI standard	Standard disclosure	Telenor response	UN Global Compact
	to temporary or part-time employees	employees, with some reservations for part-time employees with less than 20% and 20%-50% position. The HQ has also the substantially largest employee group.	
<b>GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2017</b>			
403-3	Workers with high incidence or high risk of diseases related to their occupation	<a href="#">Telenor Group Sustainability Report 2017</a> - p.13 Telenor faces a range of OHS&S related challenges in the markets it operates, e.g. traffic-related incidents.  There were no work-related employee or in-house contractor fatalities reported in Telenor Group for 2017. It is with great regret that during 2017, we have experienced seven fatalities in our supply chain in Pakistan, Bangladesh and India.	SDG 8
<b>GRI 404: TRAINING AND EDUCATION 2017</b>			
404-2	Programs for upgrading employee skills and transition assistance programs	<a href="#">Telenor Group Sustainability Report 2017</a> -p. 12 – 14	Principle 6 SDG 4, 5, 8,10
404-3	Percentage of employees receiving regular performance and career development reviews	All employees shall receive regular performance and career development reviews regardless of category and gender. This is a global group requirement.	Principle 6 SDG 4, 5, 8, 10
<b>GRI 406: NON-DISCRIMINATION 2017</b>			
406-1	Incidents of discrimination and corrective actions taken	<a href="#">Telenor Group Sustainability Report 2017</a> -p. 12	Principle 6 SDG 5, 10, 16
<b>GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING 2017</b>			
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Telenor is committed to respecting labour rights principles as laid down in UN Global Compact and ILO's fundamental conventions. These principles relating to respecting the rights to freedom of association and collective bargaining, the elimination of forced labour, child labour and discrimination in the work place, are reflected in Telenor's Code of Conduct and Group Policy People as well as Supplier Conduct Principles. Telenor shall comply with applicable laws and regulations. In the event that there are differences between such laws and regulations and the standards set out in our Code of Conduct, Telenor will apply the higher standard consistent with applicable local laws.  Telenor believes in employee involvement, through dialogue with employees or their recognized employee representatives. We have established a framework for employee	Principle 3 SDG 8

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		<p>involvement promoting partnership based on good and trusting dialogue, e.g. in relation to acknowledged labour unions or through People Councils as an internal arena for dialogue with elected employee representatives. As per now we have unions in 6 countries, as well as People Councils in 6 countries of which 4 in Asia (PC is not replacing unions). We believe that this will contribute to further build a sustainable culture on respect for labour rights.</p> <p><a href="#">Telenor Group Sustainability Report 2017</a> - p.13</p>	
<b>GRI 408: CHILD LABOUR 2017</b>			
408-1	Operations and suppliers at significant risk for incidents of child 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>This is also part of risk assessment of the supplier pre contract and annual Self-Assessment Questionnaire (SAQ).</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 &amp; awareness sessions/supplier conferences organised locally. See more about underage labour: <a href="#">Telenor Group Sustainability Report 2017</a> - p.16</p>	Principle 2, 5 SDG 10, 16
<b>GRI 409: FORCED OR COMPULSORY LABOR 2017</b>			
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	<p><a href="http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/">http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/</a> See section Sustainable Supply chain in <a href="#">Telenor Group Sustainability Report 2017</a> - p.14</p>	Principle 4 SDG 8, 10
<b>GRI 410: SECURITY PRACTICES 2017</b>			
410-1	Security personnel trained in human rights policies or procedures	<p>Identified omission: 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 OHS issues are part of training. As all Telenor companies shall have</p>	Principle 1 SDG 16

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		management system according to OHSAS 18001/ ISO 45001, the follow up and training is part of the management system processes.	
<b>GRI 411: RIGHTS OF INDIGENOUS PEOPLES 2017</b>			
411-1	Incidents of violations involving rights of indigenous peoples	In 2017 there were no incidents reported.	Principle 1 SDG 2
<b>GRI 412: HUMAN RIGHTS ASSESSMENT 2017</b>			
412-1	Operations that have been subject to human rights reviews or impact assessments	In order to stay informed and follow developments in human rights in our markets, we worked during 2017 to update our Group level human rights due diligence. With assistance from BSR we revisited our understanding of country risks, as well as exploring international trends and good practices for mitigation. This work also fed into an update of BU level due diligence, starting with a pilot in four BUs in Q4 2017. See <a href="#">Telenor Group Sustainability Report 2017</a> - p 17. Further we conduct assessments related to e.g. specific projects, entry into new markets.	Principle 1
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	100% of all suppliers, about 23,500 suppliers to Telenor Group have signed an Agreement on Responsible Business Conduct.  The Agreement on Responsible Business Conduct that includes human rights clauses are implemented broadly to all suppliers. "Suppliers" are defined widely and covers all contracting parties also significant investments agreements. <a href="#">Telenor Group Sustainability Report 2017</a> - p 15.	Principle 2
<b>GRI 414: SUPPLIER SOCIAL ASSESSMENT 2017</b>			
414-1	New suppliers that were screened using social criteria	The Business Units evaluate the SCP Risk for any existing or potential Supplier and/or its Sub Suppliers. 100% of new suppliers were screened using labour practices criteria <a href="#">Telenor Group Sustainability Report 2017</a> - p 17.	SDG 5, 8, 10, 16
414-2	Negative social impacts in the supply chain and actions taken	During 2017, Telenor recorded two incidents in Pakistan and one incident in Bangladesh of underage labour (15-18 years) involving hazardous work. Further, one incident in Bangladesh and one incident in Pakistan of child labour (12-14years) was identified. In 2017, the number of child labour/underage labour findings was significantly reduced from previous years: the number of incidents of underage labour in 2015 included 34 people, and the number of incidents of child labour in 2015 included 13 children. A similar number of incidents of underage labour in 2016 included 16 people and the number of incidents of child labour in 2016	SDG 5, 8, 10, 16



GRI standard	Standard disclosure	Telenor response	UN Global Compact
		included 4 children. <a href="#">Telenor Group Sustainability Report 2017</a> - p 16.	
<b>GRI 416: CUSTOMER HEALTH AND SAFETY 2017</b>			
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	We have not identified any incidents or non-compliances with H&S regulations and applicable standards in 2017	SDG 16
<b>GRI 417: MARKETING AND LABELING 2017</b>			
417-2	Incidents of non-compliance concerning product and service information and labeling	Telenor is not aware of any incidents or non-compliances concerning product and service information and labelling in 2017	SDG 12, 16
<b>GRI 418: CUSTOMER PRIVACY 2017</b>			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Telenor is not aware of any substantiated complaints regarding breaches of customer privacy and losses of customer data in 2017.	SDG 16
<b>GRI 419: SOCIOECONOMIC COMPLIANCE 2017</b>			
419-1	Non-compliance with laws and regulations in the social and economic area	<p>The Norwegian Competition Authority (NCA) and EFTA Surveillance Authority (ESA) carried out an inspection of Telenor in Norway on 4-13 December 2012 based on suspected abuse of dominant position and/or anti-competitive collaboration concerning Telenor Norway's mobile operation. In November 2016, NCA sent a Statement of Objection setting out its preliminary assessment of Telenor's behaviour in the mobile market. The preliminary allegations from the NCA was stated as it was considering imposing a fine of NOK 906 million against Telenor for a historical breach of the prohibition against abuse of a dominant position related to NCA's concern for the roll-out of the third mobile network in Norway.</p> <p>In June 2018, NCA decided to impose a fine of NOK 788 million on Telenor as a result of the investigations which commenced on 4 December 2012. Telenor disagrees that the company has violated the Norwegian Competition Act. See Telenor's notifications to Oslo Stock Exchange: <a href="https://newsweb.oslobors.no/message/454216">https://newsweb.oslobors.no/message/454216</a></p> <p>The Telenor Group'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 <a href="#">Telenor Annual Report 2017</a> –p. 20 Regulatory Risk</p>	SDG 16

## GRI 103: Management Approach

### **GRI 103-1 Explanation of the material topic and its Boundary**

Please see below for a presentation on how Telenor measures and manages its material aspects. More information and process details can be found in the materiality assessment description [here](#) (103-1a).

For Telenor, all material topics are relevant throughout our value chain, unless otherwise stated in the table below (103-1b and c).

Where relevant, any adjustments or limitations regarding boundary of a topic will also be found in the table (103-1c).

### **GRI 103-2 The management approach and its components - How we manage it**

For Telenor, the purpose of the management approach is to control major risks and opportunities for all material topics, regardless of whether they are financial or non-financial. Therefore, material topics are in principle governed in the same way as described in our approach to [Corporate Governance](#) in general.

This main document is complimented by a set of key group policies with more detailed information about roles, responsibilities and commitments for the material topics:

- [Code of Conduct](#)
- [Supplier Conduct Principles](#)
- [Telenor Group Human Rights Principles](#)
- [Vision & Values](#)
- [Group Policy Sustainability](#)

For further information, please see table below (column “How we manage it”) and also Telenor’s website on [Corporate Governance](#)

For commitments targets and actions on our material aspects, please see the relevant section in the [Telenor Group Sustainability Report 2017](#)

### **GRI 103-3 Evaluation of the management approach**

Each material topic has a corresponding chapter in the Sustainability part of the Annual Report where we also provide an evaluation of the management approach. Page references and any exemptions from the GRI standards may be found in the table starting next page.

Additional information on GRI 103-2 and GRI 103-3 can be found in the table below:

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2017
<b>Human Rights</b> <i>- ensuring that operations or business relationships do not infringe on human rights, -respecting the human right of freedom of expression</i>	Telenor’s <a href="#">Code of Conduct</a> , Policies, <a href="#">Supplier Conduct Principles</a> and <a href="#">Vision &amp; Values</a> , provide the Telenor Group with a common approach as to how we treat each other, how we serve our customers, how we run our business and what we believe our role to be in the societies where we operate.	Detailed reporting on how we work with Human Rights can be found in our annual report. This information is aligned with the <a href="#">Guiding Principles of the Telecommunications Industry Dialogue on Freedom of Expression and Privacy</a> (ID).	<a href="#">Telenor Group Sustainability Report 2017</a> page 17 Human Rights – Status and Ambition
<b>Ethics and Anti-Corruption</b> <i>- including anti-corruption and bribery, anti-competitive behaviour</i>	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 managed through our Code of Conduct and other guiding documents	Alignment with our approach is carefully monitored by our compliance functions.	<a href="#">Telenor Group Sustainability Report 2017</a> page 11 Ethics and Anti-Corruption
<b>Privacy and Data Security</b> <i>- avoiding information being overused for commercial or other purposes or stolen</i>	Telenor has a clear privacy position: Open and transparent about how personal data is collected and used, committed to using personal data to provide better and more relevant services, and thorough in keeping personal data safe. The reviews of Telenor’s business units have covered routines and processes for privacy, authority requests and information management.	Alignment with our approach and governing principles is carefully monitored by our privacy- and security functions.	<a href="#">Telenor Group Sustainability Report 2017</a> page 19 and 20 Privacy and Cyber Security – Status and Ambition
<b>Corporate Governance</b> <i>- including policies ensuring board independence, board diversity, remuneration and responsibility and accountability of the board</i>	Telenor Group’s corporate governance principles and practices define a framework of rules and procedures for the way business is governed and controlled in all Telenor business units. Each business unit adopts the relevant governing documents.	Business Unit performance reviews are conducted regularly with each of the main BUs in the Telenor Group, and are chaired by the Group CFO with participation from other relevant functional EVPs. The purpose of these meetings is to monitor and follow-up key strategic priorities, financial and operational performance relative to defined targets.	<a href="#">Telenor Annual Report 2017</a> page 24 - Governance
<b>Service Reliability</b> <i>- avoiding network failures, ensuring reliability of high standards of the service in all operating areas, especially during times of disasters</i>	Many of Telenor’s business units, especially the ones operating in disaster prone areas have sound backup plans and redundancy options to ensure service reliability under challenging circumstances.	This is an integrated part of line management responsibility.	<a href="#">Telenor Group Sustainability Report 2017</a> page 29 - Service Reliability

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2017
<b>Supply Chain Sustainability</b> <i>- including human rights, occupational health, safety and personnel security, environment, conflict minerals, hazardous materials, etc.</i>	Telenor’s approach to supply chain sustainability is to legally oblige the supplier to uphold responsible business practice according to our policies.	Telenor carries out inspections to monitor compliance with the requirements on responsible business conduct.	<a href="#">Telenor Group Sustainability Report 2017</a> page 15 Supply Chain Sustainability – Status and Ambition
<b>Digital Access and Outreach</b> <i>- access to the service in all markets, including rural and remote areas. In emerging markets focus on bridging the digital divide.</i>	This is part of Telenor’s business strategy and is managed accordingly throughout the entire Group.	We carefully track and report development of network capacity and coverage. This is reported all the way to top management at regular intervals.	<a href="#">Telenor Group Sustainability Report 2017</a> page 25 Digital Access and Outreach– Status and Ambition
<b>Transparency &amp; stakeholder engagement</b> <i>- includes provision of timely, accessible and accurate disclosure of performance, goals and policies related to sustainability activities.</i>	These topics are managed through a combination of following public reporting requirements as well as being an active participant in several regional and international initiatives (Global Compact, GNI, ID, GRI, GeSI, etc.).	In addition to internal overview and control, our actions, results and reporting is monitored both through independent third-party assurance as well as various interactions with local stakeholders.	<a href="#">Telenor Group Sustainability Report 2017</a> page 10 - Stakeholder engagement
<b>Labour Rights and Standards;</b> <i>-including diversity, attraction and retention of the best people, training and development opportunities, career prospects – as well as occupational health and safety.</i>	Please see top document references above.	Responsibility of tracking policy requirements, goals and targets lies with the line management. Group Sustainability and Group People oversees the process.	<a href="#">Telenor Group Sustainability Report 2017</a> page 13 Labour Rights and Standards – Status and Ambition
<b>Economic contribution to society</b> <i>- includes investments in local communities, including job creation, skills development, charitable contributions, tax and licenses</i>	The topic is an integrated part of our financial governance system.	In addition to following international accounting standards, Telenor has reported direct, country-by-country impact on investment, taxation and employment, since 2014.	<a href="#">Telenor Group Sustainability Report 2017</a> page 32 Economic contribution to society – Status and Ambition
<b>Child Online Safety</b> <i>- including online and mobile safety, entailing education and tools for children, parents and carers to develop resilience against online risks and harm.</i>	Global programmes, industry engagement, expert partnerships and ambitions to provide education and tools are the main avenues of managing Telenor’s intent to empower children, parents and carers. The topic is an integrated	In close coordination with Group Sustainability, the different business units initiate projects and report back to Group for evaluation.	<a href="#">Telenor Group Sustainability Report 2017</a> page 23 Child Online Safety – Status and Ambition

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2017
	part of Group Policy Sustainability and is managed through a designated position in Group Sustainability which oversees and coordinates initiatives throughout the Business Units.		
<b>Innovating and Researching for Shared Value</b> <i>-including solutions with social benefits, such as mFinance, mHealth, mAgri, mEducation, mGovernment, mWomen and smart working.</i>	Given the nature of this material aspect, it is difficult to establish a separate governing document; however, it is a key focus in our strategy, firmly placing a responsibility throughout the business units with a coordinating responsibility at Group Sustainability.	Since the topic is still in its infancy and mainly project based, the different results are communicated to Group for continuous evaluation and improvement.	<a href="#">Telenor Group Sustainability Report 2017</a> page 26 Innovating and Researching for Shared Value – Status and Ambition
<b>Mobile Phones and Health</b> <i>- including electromagnetic fields from masts and mobile phones, user complaints concerning issues such as radiation, radio waves and Wi-Fi</i>	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). These guidelines are endorsed by the World Health Organisation (WHO). The responsibility lies with each business unit.	Since all business units must work in accordance with national and international guidelines and these represent the basis for all our planning, installation work and safety measures at antenna sites; this is monitored by the line management	<a href="#">Telenor Group Sustainability Report 2017</a> page 28 Mobile Phones & Health – Status and Ambition
<b>Environment and Climate Change</b> <i>- including EMS and waste management, energy efficiency, energy use and reduction of greenhouse gas emissions– as well as services and technologies that enable society/ customers to reduce their climate impact</i>	Please see <a href="#">Environment and Climate</a>	Environmental Management Systems (EMS) in line with ISO 14001 shall be in place and followed-up in all business units.	<a href="#">Telenor Group Sustainability Report 2017</a> page 21 Environment and Climate Change – Status and Ambition