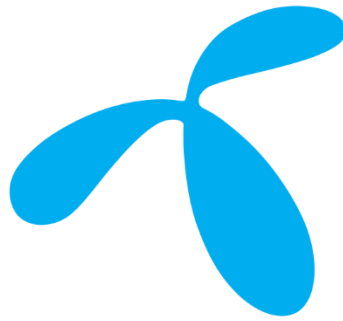


People

GROUP POLICY



telenor group

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GROUP POLICY

People

Policy owner: EVP People, Sustainability and External Relations

Approver: President & Group CEO

Date of approval: 2023-07-13

1. Purpose & Scope

Telenor is a people company. Our employees are considered our most valued resource and their development, well-being and motivation are crucial for our success as a company. The Group Policy People sets out requirements to support the identification and mitigation of high risk areas related to our employee view stated above.

The policy scope is a minimum set of requirements, and not an extensive overview of governing areas related to our employees or our responsibility as an employer.

2. Requirements

2.1. Our Culture

The Telenor Behaviours together with the Code of Conduct is the foundation of Telenor's culture and act as a guide and set expectations to all behaviour and decision-making in Telenor.

The Telenor Behaviours are:

- Always explore
- Create together
- Keep promises
- Be respectful

In relation to our Behaviours the Telenor Company shall actively follow up the implementation of the Behaviours to create awareness, commitment and compliance by offering necessary training and support.

2.2. Diversity and Inclusion

Telenor is an equal opportunity employer and diversity and inclusion is imperative to the way we do business, 'creating together' services and solutions that include different perspectives.

The Telenor Company shall ensure continuous focus on all people related processes to enable diversity and inclusion and minimise any sources of bias. This includes:

- outline a local diversity and inclusion action plan,
- conduct equal pay analysis (with a particular emphasis on gender),
- secure diversity in recruitment and selection process,
- promote access to diversity and inclusion learning opportunities to raise awareness,
- support employee resource groups (ERGs) (or internal networks) that create a sense of belonging for diverse and underrepresented groups, and
- consider diversity as a selection criteria, where possible, when selecting suppliers.

2.3. Mobility

Cross-border work might imply service hiring across legal entities (e.g. Virtual engagements, commuters, Long term international assignments and short term international assignments). Before initiating any Cross-border contracts the Telenor Company shall:

- ensure the contractual setup is compliant with Telenor Group Policies (especially Group Policy Finance and tax requirements, Group Mobility Program) and local laws and regulations.
- track their cross-border workforce and be able to report to Group People Policy Owner if requested.

2.4. Employer Responsibility

A relationship between Telenor Companies, the employees and the employee representative shall be based on mutual respect and dialog. Consequently, the Telenor Company shall:

- Be a responsible employer and maintain a consistent, accurate and non-discriminatory employer practice in accordance with applicable legislation and good corporate governance.
- Utilise the employees' experience and insight to influence working conditions and contribute to sustainable business growth through dialogue with employees or their recognised representatives. This involves information sharing in meetings between management and employees when needed.
- Respect the International Labour Organisation's fundamental conventions, concerning freedom of association and the recognition of the right to collective bargaining, the elimination of forced labour, child labour and discrimination in the workplace, as set out in the Telenor Code of Conduct.
- Neither employ nor contract child labour. The Telenor Company shall ensure that personnel under the age of 18 do not perform any hazardous work.

- Opposes the use of forced or compulsory labour, including but not limited to exchange of labour for payment of debt. Any employee shall be free to leave his/her employment after giving reasonable notice. No one shall be required to deposit money, identity papers or similar, to get or keep their employment with Telenor.
- Respect and encourage the right to freedom of association and the right to collective bargaining. The Telenor Company shall allow its employees to freely elect representatives to advocate employee matters and carry out their functions in accordance with relevant laws and regulations.
- Avoid discrimination against employee representatives. When employees seek to unionise, the Telenor Company will recognise unions established in accordance with national law and regulations.
- Promote principles on fundamental labour rights and related requirements, as stated in agreements entered into by Telenor ASA.
- Make sure that working hours are not excessive and that the employee gets adequate time for recovery. Working hours shall be compliant with applicable local laws and regulations and applicable collective agreements.

The Telenor Company shall document the employment terms in a written agreement with the employee and ensure storage in compliance with local laws and regulations. The employment shall as the main rule be permanent. Use of temporary work, including fixed term contracts, shall either follow local law regulations for temporary work or, if nonapplicable, be based on valid business reasons. In addition, Telenor Code of Conduct shall be part of the employment agreement.

2.5. **Employee Data Administration**

The Telenor Company shall employ the Telenor HQ mandated Human Resources Information Systems and adopt key people processes (e.g. internal survey and performance and development process) to enable effective employee data management, as well as employee experiences in accordance with Telenor standards.

2.6. **Digital Collaboration Tools**

The Telenor Company shall provide employees with relevant digital collaboration tools to enable effective and secure collaboration within Telenor and with external partners.

2.7. **Total Rewards**

Rewards in Telenor shall contribute to attracting, engaging and retaining the right employees with an aim to deliver sustainable value for shareholders in accordance with our culture and behaviours.

Employees who are nominated by Telenor to serve on the Board of Directors of subsidiaries, whether controlled or non-controlled, are not entitled to a separate remuneration such as Director's Fee, shares, share options, bonus etc. This also applies to employees who hold positions in sub-committees of such Boards.

3. Reference Documents

- Group Policy Finance
- Group Program Diversity & Inclusion
- Group Mobility Program