Telenor Group GRI G4 Report 2015



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 2015 reporting applies the G4 Sustainability Reporting Guidelines.

Our aim has been to achieve alignment to the "Core" option for our 2015 report, with an in-depth and targeted reporting focusing on the most material issues 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 has been conducted in accordance with the Global Reporting Initiative G4 principles for defining report content. The process has been conducted following the key steps; identification, prioritisation and validation.

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

More details on the materiality assessment process can be found <u>here</u>.

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.



GENERAL STANDARD DISCLOSURES

The **General Standard Disclosures** provide a general strategic view of our organisation's sustainability.

Indi- cator	Description of requirement	eral strategic view of our organisation's sustainability. Telenor's disclosure
	STRATEGY AND ANALYSIS	
G4-1	Statement from the most senior decision-maker of the organization	<u>Telenor Annual Report 2015</u> – p.5-6 and online http://www.telenor.com/sustainability/
G4-2	Description of key impacts, risks, and opportunities.	Telenor Annual Report 2015 – p.45-67
	ORGANISATIONAL PROFILE	
G4-3	Name of the organization.	Telenor Group
G4-4	Primary brands, products, and services.	Telenor Annual Report 2015 p.86 and http://www.telenor.com/about-us/our-business/
G4-5	Location of the organization's headquarters.	Oslo, Norway
G4-6	Number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report.	Telenor Annual Report 2015-Segment information - p.86 and p.62-63 and http://www.telenor.com/about-us/our-business/
G4-7	Nature of ownership and legal form.	http://www.telenor.com/about-us/corporate- governance/articles-of-association/
G4-8	Markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries).	Telenor Annual Report 2015-Segment information - p.86 and http://www.telenor.com/about-us/our-business/
G4-9	Scale of the organization, including number of employees, operations, sales, capitalisation & quantity of services provided.	Telenor Annual Report 2015 – p.18-42
G4-10	Total number of employees by employment contract, gender, permanent employees, region, supervised workers, casual workers & significant variations in employment numbers.	Reported key figures 2015 from People & Organisation: http://www.telenor.com/sustainability/reporting/key- figures/#people-organisation -and see Country by Country Report in Telenor Annual Report 2015 p.62
G4-11	Percentage of total employees covered by 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.



Indi- cator	Description of requirement	Telenor's disclosure
		Based on organizational data from Norway, Serbia and Malaysia, at least 25% of all employees in Telenor Group are covered by collective bargaining agreements.
G4-12	Describe the organization's supply chain.	Telenor Annual Report 2015 - p.52-55, also outlined online: http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/
G4-13	Significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain.	Telenor Annual Report 2015-Segment information - p.85-87 Report from the Board of Directors 2015 p.18-42 Telenor Annual Report 2015 - p.84; Acquisitions in 2015
G4-14	Precautionary approach or principle addressed by the organization.	Telenor Annual Report 2015- p.114; Managing capital and financial risk management Telenor Code of Conduct
G4-15	List externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses.	The most important social charters, principles, or other initiatives to which Telenor subscribes or endorses are: UN Global Compact UN Global Goals for Sustainable Development GRI CDP (former Carbon Disclosure Project) Principles of the World Economic Forum Telecommunications Industry Dialogue on Freedom of Expression and Privacy http://www.telenor.com/sustainability/reporting/our-performance/ and https://www.telenor.com/sustainability/responsible-business/human-rights/mitigate/telenors-alignment-with-the-industry-dialogue-guiding-principles-2015/
G4-16	Memberships of associations (such as industry associations) and national or international advocacy organizations.	 GSMA (Global Mobile Operators' Association) Global e-Sustainability Initiative (GeSI) Joint Audit Committee (JAC) United Nations Global Compact (UNGC) Confederation of Norwegian Enterprise (NHO) Child Labour Platform (CLP) UNI Global Union Telenor Annual Report 2015 - p.53 http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/inspections-and-risk-mitigation/



Indi- cator	Description of requirement	Telenor's disclosure
	IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES	
G4-17	Entities included in the organization's consolidated financial statements or equivalent documents.	Telenor Annual Report 2015 - p.74 and p.86 http://www.telenor.com/sustainability/reporting/
G4-18	Process for defining the report content and the Aspect Boundaries and implementation of the Reporting Principles for defining report content.	Approach to defining report content and materiality matrix is outlined online: http://www.telenor.com/corporate-responsibility/reporting/scope-and-principles/
G4-19	List all the material Aspects identified in the process for defining report content.	Telenor's material aspects Human rights Ethics and anti-corruption Privacy and Data Security Corporate governance Service reliability and quality Responsible supply chain Digital access and outreach Transparency and stakeholder engagement Our employees Economic contribution to society Child online safety Low-carbon solutions Socially transformational solutions Mobiles phones and health Freedom of expression Researching for shared value Climate efficient energy use
G4-20	Aspect Boundary within the organization for each material aspect	Telenor Materiality Assessment 2015 Telenor Annual Report 2015 -p.86 The aspect boundary for each material aspect has been discussed in the Telenor Materiality assessment process. See Telenor Materiality Assessment 2015 for details.
G4-21	Aspect Boundary outside the organization for each material aspect	The aspect boundary for each material aspect has been discussed in the Telenor Materiality assessment process. See Telenor Materiality Assessment 2015 for details.
G4-22	Effect of any restatements of information provided in previous reports, and the reasons for such restatements.	http://www.telenor.com/corporate- responsibility/reporting/key-figures/ It states that the International Energy Agency (IEA) has changed its methodology for estimating country-specific indicators for CO2 emissions related to electricity production



Indi-	Description of requirement	Telenor's disclosure
cator		
G4-23	Significant changes from previous	http://www.telenor.com/corporate-
	reporting periods in the Scope and	responsibility/reporting/key-figures/
	Aspect Boundaries.	Increased scope due to full year of operations in
		Telenor Myanmar as well as increased scope of
		Telenor's operations in India.
	STAKEHOLDER	
	ENGAGEMENT	
G4-24	Stakeholder groups engaged by the	Stakeholders engaged for materiality matrix include
	organization.	policy makers, investors, employees, community &
		media, customers and NGOs- outlined online:
		http://www.telenor.com/corporate-
		responsibility/reporting/scope-and-principles/
G4-25	Basis for identification and selection of	http://www.telenor.com/corporate-
	stakeholders with whom to engage.	responsibility/reporting/scope-and-principles/
G4-26	Approach to stakeholder engagement,	http://www.telenor.com/investors/
	including frequency of engagement by	http://www.telenor.com/innovation/youthsummit/
	type and by stakeholder group, and an	Telenor Materiality Assessment 2015
	indication of whether any of the	Sustainability Seminar Myanmar 2016
	engagement was undertaken	
	specifically as part of the report	
	preparation process.	
G4-27	Key topics and concerns that have been	This is outlined in Telenor's materiality assessment
	raised through stakeholder	process.
	engagement, and how the organization	Telenor Materiality Assessment 2015
	has responded to those key topics and	Telenor Annual Report 2015 – p.50
	concerns, including through its	
	reporting. Report the stakeholder	
	groups that raised each of the key	
	topics and concerns.	
	REPORT PROFILE	
G4-28	Reporting period (such as fiscal or	Calendar year 2015
	calendar year) for information provided.	
G4-29	Date of most recent previous report (if	Previous report published in 2015, covering calendar
_	any).	year 2014.
G4-30	Reporting cycle (such as annual,	Annual
	biennial).	
G4-31	Provide the contact point for questions	Jan Kristensen / Eyvind Lome
	regarding the report or its contents.	E-mail: sustainability@telenor.com
G4-32	'In accordance' option chosen.	GRI Sustainability Reporting Guidelines G4-Core.
	GRI Content Index for the chosen	The GRI index can be found here:
	option. Reference to the External	http://www.telenor.com/sustainability/reporting/gri-
	Assurance Report.	index/
		An independent assurance of the content of this report
		has been done for the information regarding energy
ĺ		consumption and climate emissions. The assurance has



Indi- cator	Description of requirement	Telenor's disclosure
		been done by DNV-GL Business Assurance.
G4-33	External Assurance for the report	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.
	GOVERNANCE	
G4-34	Governance structure of the organization, including committees of the highest governance body.	http://www.telenor.com/about-us/corporate- governance/ Telenor Annual Report 2015 - p.38 Telenor Corporate Governance Report 2015
G4-35	Process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees.	Telenor Corporate Governance Report 2015
G4-36	Executive-level position or positions with responsibility for economic, environmental and social topics, and whether post holders report directly to the highest governance	Telenor Annual Report 2015 - p.41 Ethics and Sustainability Committee established within the board which has oversight on corporate responsibility and sustainability issues.
G4-37	Processes for consultation between stakeholders and the highest governance body on economic, environmental and social topics.	http://www.telenor.com/about-us/corporate- governance/ and Telenor Corporate Governance Report 2015 -p.18 Ethics and Sustainability Committee.
G4-38	Composition of the highest governance body and its committees.	Telenor Annual Report 2015 - p.16 and 39 and outlined online: http://www.telenor.com/about-us/corporate-governance/board-of-directors/ Committees within Board of Directors: http://www.telenor.com/about-us/corporate-governance/board-of-directors/committees-of-the-board/ None of the Board members, apart from employee representatives, are employees of Telenor or have carried out work for Telenor.
G4-39	Report whether the Chair of the highest governance body is also an executive officer.	The CEO is not holding the position of Chairman of the Board
G4-40	Nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members.	The selection processes for the Board of Directors and its committees are outlined on p.39-41 the Telenor Annual Report 2015, and online: http://www.telenor.com/about-us/corporate-governance/nomination-committee/ . The Corporate Assembly elects members of the board and supervises the Board's management of company business.



Indi- cator	Description of requirement	Telenor's disclosure
G4-41	Processes for the highest governance body to ensure conflicts of interest are avoided and managed. Report whether conflicts of interest are disclosed to stakeholders.	Online: http://www.telenor.com/about-us/corporate-governance/code-of-conduct/
G4-42	The highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental and social impacts.	http://www.telenor.com/about-us/corporate-governance/ethics-compliance/ Code of Conduct is owned and approved by the Board of Directors and is an integral part of the formal governance regime in Telenor. The Ethics & Sustainability Committee of the Telenor ASA Board of Directors shall oversee, assess and follow up that the organisations leadership is creating an ethical atmosphere in the workplace according to the Code of Conduct and accompanying governing documents (also referred to as "tone of the top").
G4-43	Measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics.	http://www.telenor.com/about-us/corporate-governance/ http://www.telenor.com/about-us/corporate-governance/board-of-directors/committees-of-the-board/ Telenor Corporate Governance Report 2015 p.15 An updated version of Telenor's Code of Conduct was approved by the Board in October 2015 and published in January 2016. To also strengthen the focus on ethics and the company's Code of Conduct, an online learning campaign was developed in 2015.
G4-44	Processes for evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics. Report whether such evaluation is independent or not, and its frequency. Report whether such evaluation is a self-assessment.	Telenor Corporate Governance Report 2015 p.15 http://www.telenor.com/about-us/corporate-governance/
G4-45	Highest governance body's role in the identification and management of economic, environmental and social impacts, risks, and opportunities. Include the highest governance body's role in the implementation of due diligence processes. Report whether stakeholder consultation is used to support the highest governance body's identification and management of	http://www.telenor.com/about-us/corporate-governance/ Telenor Corporate Governance Report 2015 p.15



Indi-	Description of requirement	Tolonov's disclosure
cator	Description of requirement	Telenor's disclosure
	economic, environmental and social	
	impacts, risks, and opportunities.	
G4-46	Highest governance body's role in	<u>Telenor Corporate Governance Report 2015</u> - p.17
	reviewing the effectiveness of the	http://www.telenor.com/about-us/corporate-
	organization's risk management	governance/
	processes for economic, environmental	
04.47	and social topics.	T
G4-47	Frequency of the highest governance	Telenor Corporate Governance Report 2015 p.15
	body's review of economic,	http://www.tolonov.com/ohout.vo/componeto
	environmental and social impacts, risks,	http://www.telenor.com/about-us/corporate-
G4-48	and opportunities. Highest committee or position that	governance/ http://www.telenor.com/about-us/corporate-
U4-40	formally reviews and approves the	governance/
	organization's sustainability report and	and Telenor Corporate Governance Report 2015 p.15
	ensures that all material Aspects are	Ethics and Sustainability Committee.
	covered.	Letties and Sustamasiney Committee.
G4-49	Report the process for communicating	Telenor Code of Conduct
	critical concerns to the highest	
	governance body.	
G4-50	Report the nature and total number of	<u>Telenor Annual Report 2015</u> - p.114; Managing capital
	critical concerns that were	and financial risk management
	communicated to the highest	http://www.telenor.com/about-us/corporate-
	governance body and the mechanism(s)	governance/
	used to address and resolve them.	
G4-51	Remuneration policies for the highest	<u>Telenor Annual Report 2015</u> , _ – note 34 Remuneration
	governance body and senior executives	policy -p.125
	for the below types of remuneration	<u>Telenor Corporate Governance Report 2015</u> - p.17
	and how performance criteria in the remuneration policy relate to the	With regard to remuneration issues the Covernance
	highest governance body's and senior	With regard to remuneration issues, the Governance and Remuneration Committee considers Telenor's
	executives' economic, environmental	remuneration policy and programs, including bonus
	and social objectives.	programmes and share-based schemes, and presents
	and social objectives.	recommendations to the Board of Directors for
		decision. The Committee annually evaluates the CEO's
		remuneration and presents recommendations to the
		Board of Directors for decision.
G4-52	Process for determining remuneration.	Telenor Annual Report 2015 – note 34 Remuneration
	Report whether remuneration	policy -p.125
	consultants are involved in determining	· · ·
	remuneration and whether they are	The Governance and Remuneration
	independent of management. Report	Committee considers the President and
	any other relationships which the	CEO's total salary and presents its recommendations to
	remuneration consultants have with the	the Board, which in turn determines the President and
	organization.	CEO's salary and other benefits.
		The Governance and Remuneration
		Committee further considers the total
		remuneration package for the executives who report
		directly to the President and CEO



Indi-	Description of requirement	Telenor's disclosure
G4-53	How stakeholders' views are sought and taken into account regarding remuneration, including the results of votes on remuneration policies and	Telenor Annual Report 2015 – note 34 Remuneration policy -p.125
G4-54	proposals, if applicable. The ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.	Telenor Annual Report 2015 – note 34 Remuneration policy -p.125
G4-55	The ratio of percentage increase in annual total compensation for the organization's highest-paid individual in each country of significant operations to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual) in the same country.	Telenor Annual Report 2015 – note 34 Remuneration policy -p.125
	ETHICS AND INTEGRITY	
G4-56	Description of the organization's values, principles, standards and norms of behavior such as codes of conduct and codes of ethics.	The company's vision to empower societies is intended to further motivate employees by understanding how Telenor's business can impact peoples' lives and society. Telenor's corporate culture and its way of doing business (Telenor Way) is defined by the company's mission, the Code of Conduct, Leadership Expectations, Corporate Governance Framework (including Policies and Manuals) and Telenor's corporate values: keep promises, make it easy, be respectful and be inspiring. Code of conduct/ethics and compliance also available online: http://www.telenor.com/about-us/corporate-governance/code-of-conduct http://www.telenor.com/about-us/corporate-governance Telenor Corporate Governance Report 2015
G4-57	Internal and external mechanisms for seeking advice on ethical and lawful behaviour, and matters related to organizational integrity, such as helplines or advice lines.	Telenor has established a Hotline to Compliance throughout the Group. The hotline is not staffed around the clock, but incidents may still be reported in official local language by phone, e-mail or postal service 24 hours a day, every day of the year. Incidents may also be reported directly to Local Ethics &



Indi- cator	Description of requirement	Telenor's disclosure
		Compliance Officers or the Group Ethics & Compliance Officer. Ethics & Compliance Hotline
G4-58	Internal and external mechanisms for reporting concerns about unethical or unlawful behaviour, and matters related to organizational integrity, such as escalation through line management, whistleblowing mechanisms or hotlines.	Employees who become aware of any kind of infringement are encouraged to report this to their leader or the Local- or Group Ethics & Compliance Officer. In fact, failure to do so is itself a breach of Telenor's Code of Conduct. Incidents may be reported and handled confidentially if desired. Telenor does not allow reprisals of any kind against those who, in good faith, report an infringement or suspicion of an infringement of the rules or guidelines. All Compliance Incidents shall be handled by the relevant Ethics & 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. Ethics & Compliance Hotline



SPECIFIC STANDARD DISCLOSURES

Indi- cator	Description of requirement	Telenor's disclosure
	CATEGORY: ECONOMIC	
	ASPECT: ECONOMIC	
	PERFORMANCE	
G4- DMA	Disclosure on Management Approach	Telenor Corporate Governance Report 2015 p.3-4 Telenor Annual Report 2015 p.17-18
G4-EC1	Direct economic value generated and distributed	Telenor Annual Report 2015 - p.68 and p.86
G4-EC2	Financial implications and other risks and opportunities for the organization's activities 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. Telenor Annual Report 2015 - p.56
G4- EC3	Coverage of the organization's defined benefit plan obligations	<u>Telenor Annual Report 2015 - 25 note - Pension</u> obligations- p.109-111 and p.128
	ASPECT: INDIRECT ECONOMIC IMPACT	
G4- DMA	Disclosure on Management Approach	Telenor Group's business strategy: http://www.telenor.com/about-us/our-strategy/
G4- EC8	Significant indirect economic impacts, including the extent of impacts	See section "Vital for Society" on page 60 and "Innovating for Shared Value" on page 64 in Telenor Annual Report 2015
	ASPECT: PROCUREMENT	
	PRACTICES	
G4- DMA	Disclosure on Management Approach	Defining Materiality: http://www.telenor.com/sustainability/reporting /scope-and-principles/ Telenor's Board of Directors has adopted a set of Supplier Conduct Principles that all contracting parties are required to adhere to. Telenor carry out supplier inspections across the Group.
G4- EC9	Proportion of spending on local suppliers at significant locations of operation	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



Indi- cator	Description of requirement	Telenor's disclosure
		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. 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. See also: http://www.telenor.com/about-us/corporate-governance/code-of-conduct/ and section "Ethics and anti-corruption" on page 46 in Telenor Annual Report 2015
	CATEGORY: ENVIRONMENTAL ASPECT: ENERGY	
G4- DMA	Disclosure on Management Approach	Telenor Annual Report 2015 – p.56 - Climate and environment. Telenor Group requires that a Sustainability Criteria Checklist is used during the procurement process, and have environmental management systems based on the ISO14001 standard for all business units.
G4-EN3	Energy consumption within the organization	 Reported figures are for total Telenor Group in the financial year 2015. Total fuel consumption from non-renewable sources: 1412 GWh Total fuel consumption from renewable fuel sources: 10 GWh Total electricity consumption: 1923 GWh Total heating/cooling consumption: 19 GWh Total energy consumption: 3364 GWh Telenor did not sell any electricity or heating/cooling during 2015. Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP. Telenor's total GHG emissions and energy consumptions for 2015 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol. See also: http://www.telenor.com/sustainability/reporting



Indi-	Description of requirement	Telenor's disclosure
cator		
C4 FNF	Facemental	/key-figures/climate-change/
G4-EN5	Energy intensity	Reported figures are for total Telenor Group in the financial year 2015.
		 Energy intensity ratio for all our business units- where the ratio denominator is total revenues: 212 GWh/billion USD All our reported fuel, electricity, heating/cooling consumptions are included in the energy intensity ratio. The reported ratio uses energy consumed both within and outside the Telenor organization. Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: http://www.telenor.com/sustainability/reporting/our-performance/
		Telenor's total GHG emissions and energy consumptions for 2015 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.
		See also: http://www.telenor.com/sustainability/reporting
CA FNG	Deduction of operation	/key-figures/climate-change/
G4- EN6	Reduction of energy consumption	Reported figures are for total Telenor Group in the financial year 2015.
		 Total amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives: 70 GWh All our reported fuel, electricity, heating/cooling consumptions are included in the reported energy reduction figure. Baseline/base year: 3185 GWh in 2013 (all business units except for the new entities; Bulgaria & Myanmar) Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: http://www.telenor.com/sustainability/reporting/our-performance/
		Telenor's total GHG emissions and energy consumptions for 2015 have been independently



Indi- cator	Description of requirement	Telenor's disclosure
		verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol. See also: http://www.telenor.com/sustainability/reporting/key-figures/climate-change/
	ASPECT: EMISSIONS	
G4- DMA	Disclosure on Management Approach	Telenor Annual Report 2015 - p.56 https://www.telenor.com/sustainability/responsible-business/environment-and-climate/energy-efficiency/ https://www.telenor.com/sustainability/responsible-business/environment-and-climate/low-carbon-solutions/
G4- EN15	Direct Greenhouse Gas (GHG) emissions (Scope 1)	Reported figures are for total Telenor Group in the financial year 2015. • Total gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent for all our business units: 0.309 million tonnes • Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: http://www.telenor.com/sustainability/reporting/our-performance/ • 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). Telenor's total GHG emissions and energy consumptions for 2015 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol. See also: http://www.telenor.com/sustainability/reporting /key-figures/climate-change/
G4- EN16	Energy indirect Greenhouse Gas (GHG) emissions (scope 2)	Reported figures are for total Telenor Group in the financial year 2015. • Total gross energy indirect (Scope 2) GHG



Indi- cator	Description of requirement	Telenor's disclosure
		emissions in metric tons of CO2 equivalent for all our business units: 0.798 million tonnes • Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: http://www.telenor.com/sustainability/reporting/our-performance/ • 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). Telenor's total GHG emissions and energy consumptions for 2015 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol. See also:
		http://www.telenor.com/sustainability/reporting
G4-	Other Indirect Greenhouse Gas (GHG) emissions	/key-figures/climate-change/ Reported figures are for total Telenor Group in
EN17	(Scope 3)	 Total gross other indirect (Scope 3) GHG emissions in metric tons of CO2 equivalent for all our business units: 0.027 million tonnes Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: http://www.telenor.com/sustainability/reporting/our-performance/ 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). Telenor's total GHG emissions and energy consumptions for 2015 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol. See also: http://www.telenor.com/sustainability/reporting



Indi- cator	Description of requirement	Telenor's disclosure
-cator		/key-figures/climate-change/
G4- EN18	Greenhouse Gas (GHG) emissions intensity	Reported figures are for total Telenor Group in the financial year 2015.
		 GHG emissions intensity ratio for all our business units- where the ratio denominator is total revenues: 0.071 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), energy indirect (Scope 2), other indirect (Scope 3). Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: http://www.telenor.com/sustainability/reporting/our-performance/
		Telenor's total GHG emissions and energy consumptions for 2015 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.
		See also: http://www.telenor.com/sustainability/reporting/key-figures/climate-change/
G4- EN19	Reduction of Greenhouse Gas (GHG) emissions	Reported figures are for total Telenor Group in the financial year 2015.
		 The total amount of GHG emissions increased as a net effect of initiatives to reduce emissions but with increased business scope (more customers and increased revenues), in metric tons of CO2 equivalent: 0.037 million tonnes Our CO2 emissions per end customer have over the last four years dropped by approximately 27 % Baseline/base year: 1.065 million tonnes CO2 in 2013 (all business units except for the new entity in Myanmar) Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: http://www.telenor.com/sustainability/reporting/our-performance/



Indi-	Description of requirement	Telenor's disclosure
cator	Description of requirement	Teleflor's disclosure
		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). Telenor's total GHG emissions and energy consumptions for 2015 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.
		See also: http://www.telenor.com/sustainability/reporting
		/key-figures/climate-change/
	ASPECT: SUPPLIER	
	ENVIRONMENTAL ASSESSMENT	
G4- DMA	Disclosure on Management Approach	Telenor Annual Report 2015 - p.57
		Telenor Group will experience continued growth in total energy consumption due to increasing energy-demanding mobile broadband services. Telenor Group applies a Sustainability Criteria checklist during the procurement process to check suppliers for issues relating to their environmental management system, energy efficiency, waste management and hazardous substances. Telenor reports on the proportion of all signed contracts above a total value of USD 250,000.
G4- EN32	Percentage of new suppliers that were screened using environmental criteria	Telenor Annual Report 2015 - p.57 In 2015, in 31% of our procurement processes with contract value larger than USD 250,000 we have screened new suppliers using a specified set of sustainability criteria.
	CATEGORY: SOCIAL	
	SUB-CATEGORY: LABOUR	
	PRACTICES AND DECENT WORK	
	ASPECT: EMPLOYMENT	
G4- DMA	Disclosure on Management Approach	<u>Telenor Annual Report 2015</u> p.25- People
G4-LA2	Benefits provided to full-time employees that	Practices related to Norwegian entities:
	are not provided to temporary or part-time employees, by significant locations of operation	As a general principle Telenor is offering equal benefits, to full-time, part-time and temporary



Indi- cator	Description of requirement	Telenor's disclosure
		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.
	ASPECT: OCCUPATIONAL	
	HEALTH AND SAFETY	
G4- DMA	Disclosure on Management Approach	Telenor Annual Report 2015 p.52 and http://www.telenor.com/sustainability/responsible-business/health-safety-and-security/ The Ethics and Sustainability Committee oversees Telenor's efforts to ensure good internal occupational Health, Safety, Security and Environmental practices throughout the Group, as well as Telenor's processes and performance for sustainability in the supply chain Telenor Annual Report 2015 p.40
G4-LA7	Workers with high incidence or high risk of diseases related to their occupation	Telenor Annual Report 2015 p.52 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 inhouse contractor fatalities reported in Telenor Group for 2015, however efforts continue to mitigate the risk of any future fatalities.
	ASPECT: TRAINING AND EDUCATION	
G4 – DMA	Disclosure on Management Approach	Telenor Annual Report 2015 p.25 http://www.telenor.com/about-us/corporate-governance/ethics-compliance/ Telenor is aware that it operates in markets that require high ethical awareness and training. Therefore, the company's ethical training programs and on-boarding processes have been further developed. Telenor provides interactive training modules on anti-corruption, ethical dilemmas, and mandatory introduction to Code of Conduct. Telenor has also strengthened its portfolio of on-boarding tools and training. Telenor measures the number of employees and in-house contractors that have attended awareness training.
G4 – LA10	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in	See section "People" in <u>Telenor Annual Report</u> 2015 p.25



Indi- cator	Description of requirement	Telenor's disclosure
	managing career endings	
	ASPECT: SUPPLIER ASSESSMENT FOR LABOUR PRACTICES	
G4- DMA	Disclosure on Management Approach	Supply chain sustainability is a priority issue in Telenor's materiality matrix, and on page 37 in Telenor Annual Report 2015 we address the importance of why supply chain is material to Telenor; Telenor Group depends on key suppliers and third-party providers for supply and maintenance of equipment and services that the company needs to develop its network and operate its business. Problems that manifest in relation to the supply chain may adversely affect the Group's business and results of operations. http://www.telenor.com/about-us/corporate-
		governance/ethics-compliance/
G4- LA14	Percentage of new suppliers that were screened using labour practices 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
	SUB-CATEGORY: HUMAN	
	RIGHTS	
	ASPECT: INVESTMENT	
G4- DMA	Disclosure on Management Approach	Telenor Annual Report 2015 - p. 37 and 54 http://www.telenor.com/sustainability/responsi ble-business/human-rights/respect/ Our commitment to human rights is long standing and integrated in our top governing document – the Code of Conduct – as well as our Supplier Conduct Principles, and various policies. We have also expressed our stance in the Telenor Group Human Rights Principles.
G4-HR1	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	100% of all suppliers, about 20,600 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. Telenor Annual Report 2015 - p. 52
	ASPECT: NON-DISCRIMINATION	



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Indi- cator	Description of requirement	Telenor's disclosure
G4- DMA	Disclosure on Management Approach	See section "Human Rights" on page 54 in Telenor Annual Report 2015
G4- HR3	Total number of incidents of discrimination and corrective actions taken	For the year 2015 there were 492 compliance incidents concluded and closed. The three largest categories among the closed compliance incidents were theft and embezzlement (246), working conditions including harassment and discrimination (38) and personal data & privacy (24). Disciplinary sanctions were implemented in 55 % of the closed compliance incidents.
		See also section "Ethics and anti-corruption" in Telenor Annual Report 2015 - p. 46
	ASPECT: FREEDOM OF	
	ASSOCIATION AND COLLECTIVE	
	BARGAINING	
G4- DMA	Disclosure on Management Approach	http://www.telenor.com/sustainability/responsi ble-business/human-rights/respect/ Telenor Annual Report 2015 - p. 51
G4-HR4	Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights	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 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



Indi- cator	Description of requirement	Telenor's disclosure
		on respect for labour rights. <u>Telenor Annual Report 2015</u> - p.51
	ASPECT: CHILD LABOUR	
G4- DMA	Disclosure on Management Approach	<u>Telenor Annual Report 2015</u> - p.52
		Our approach; http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/our-approach/ We require our suppliers to commit to international standards and check compliance by
		in-house inspectors. This is also included in general risk mapping and risk assessment of supplier pre-contract.
G4-HR5	Operations and suppliers identified as having significant risk for incidents of child labour, and measures taken to contribute to the effective abolition of child labour	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.
		This is also part of risk assessment of the supplier pre contract and annual Self-Assessment Questionnaire (SAQ).
		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.
		Incidents in these areas shall be reported immediately and corrective actions are required at once.
		We also include this in training & awareness sessions/supplier conferences organised locally.
	ASPECT: FORCED OR COMPULSORY LABOUR	
G4- DMA	Disclosure on Management Approach	http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/ See section Sustainable Supply chain in Telenor Annual Report 2015 - p.52



Indi- cator	Description of requirement	Telenor's disclosure
		Telenor strengthened its internal human-rights - related efforts including an in-depth analysis of the privacy and freedom of expression situation in its business units, as well as a focus on labour rights and continuous supply chain work. Ref: G4-HR5 above
G4-HR6	Operations and suppliers identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of all forms of forced or compulsory labour	http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/ See section Sustainable Supply chain in Telenor Annual Report 2015 - p.52 Ref: G4-HR5 above
	ASPECT: SECURITY PRACTICES	
G4- DMA	Disclosure on Management Approach	The safety and security of our personnel is a key priority for Telenor, as defined in our policy framework. http://www.telenor.com/sustainability/responsible-business/health-safety-and-security/ We always seek to ensure the safety and liberty of company personnel who may be placed at risk. See
		https://www.telenor.com/sustainability/responsible-business/human-rights/mitigate/telenors-alignment-with-the-industry-dialogue-guiding-principles-2015/
G4-HR7	Percentage of security personnel trained in the organization's human rights policies or procedures that are relevant to operations	Identified omission: Percentage is not disclosed.
	ASPECT: INDIGENOUS RIGHTS	
G4 DMA	Disclosure on Management Approach	Telenor is committed to respecting human rights as set out in the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises. http://www.telenor.com/sustainability/human-rights/respect/



Indi-	Description of requirement	Telenor's disclosure
cator		
G4-HR8	Total number of incidents of violations involving rights of indigenous peoples and actions taken	In 2015 there were no incidents reported.
	ASPECT: ASSESSMENT	
G4- DMA	Disclosure on Management Approach	Telenor is committed to respecting human rights as set out in the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, Children's Rights and Business Principles, the UN Global Compact 10 Principles. These principles, along with Telenor's Code of Conduct, Policies, Supplier Conduct Principles and Vision & Values, 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. http://www.telenor.com/sustainability/responsible-business/human-rights/respect/
G4-HR9	Total number and percentage of operations that have been subject to human rights reviews or impact assessments	During 2014 we initiated human rights due diligence in all our 13 mobile operations. <u>Telenor Sustainability Report 2014</u> - p. 3. This process was followed up in 2015, see <u>Telenor Annual Report 2015</u> - p.49. Further we conduct assessments related to e.g. specific projects, entry into new markets.
	ASPECT: SUPPLIER HUMAN	
	RIGHTS ASSESSMENT	
G4- DMA	Disclosure on Management Approach	http://www.telenor.com/sustainability/supply-chain-sustainability/supplier-engangement/
G4- HR10	Percentage of new suppliers that were screened using human rights criteria	Telenor Annual Report 2015- p.51 http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/the-requirements/ A risk assessment is completed for all suppliers pre contract as regards potential breach of the supplier conduct principles in the suppliers operation or its sub-suppliers. All suppliers are required to enter into a contract titled Agreements on Responsible Business
		titled Agreements on Responsible Business Conduct (ABC) which legally binds the suppliers to the Supplier Conduct Principles covering human rights.



Indi- cator	Description of requirement	Telenor's disclosure
	ASPECT: HUMAN RIGHTS GRIEVANCE MECHANISMS	
G4- DMA	Disclosure on Management Approach	Telenor is committed to respecting human rights as set out in the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, Children's Rights and Business Principles, the UN Global Compact 10 Principles.
		These principles, along with Telenor's Code of Conduct, Policies, Supplier Conduct Principles and Vision & Values, 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. See also: http://www.telenor.com/sustainability/responsible-business/human-rights/ and Telenor Corporate Governance Report 2015
G4- HR12	Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms	For the year 2015 there were 492 compliance incidents concluded and closed. The three largest categories among the closed compliance incidents were theft and embezzlement (246), working conditions including harassment and discrimination (38) and personal data & privacy (24). Disciplinary sanctions were implemented in 55 % of the closed compliance incidents. See also section "Ethics and anti-corruption" in Telenor Annual Report 2015 - p. 46
	SUB-CATEGORY: SOCIETY ASPECT: ANTI-CORRUPTION	
G4- DMA	Disclosure on Management Approach	Telenor Annual Report 2015 - p.46-50 and Telenor Corporate Governance Report 2015 p. 6 and online: http://www.telenor.com/about-us/corporate-governance/ethics-compliance/http://www.telenor.com/about-us/corporate-governance/anti-corruption/ Telenor Anti-Corruption Handbook, and Web App



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Indi- cator	Description of requirement	Telenor's disclosure
G4-SO4	Communication and training on anti-corruption policies and procedures	A key element in the Anti-Corruption Program is capacity-building and regular training of employees. Our anti-corruption training ranges from e-learning programs, dilemma-training and other "Telenor Way" awareness activities. Telenor strives to consistently improve and tailor the training programme in order to ensure that our commitment against corruption is known and lived by throughout the company.
		In 2015, the Board also initiated an external maturity review of Telenor Group's Anti-Corruption Programme which was conducted by PwC and finalized by yearend 2015. The review shows that Telenor has a mature Anti-Corruption Programme and a strong framework. It is clearly communicated and understood in the organization that Telenor does not accept any form of corruption. PwC also identified areas for improvement, including a need for stronger monitoring and implementation of the Anti-Corruption Programme in the business units. The review will provide input and contribute to the ongoing development of the Anti-Corruption Programme going forward in 2016.
		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.
		During 2015, Telenor performed more than 32,000 Man-hours training of suppliers' employees covering both Occupational, Health, Safety and Security as well as Anti-corruption. At the end of 2015, 100% of all our about 20,600 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: https://www.telenor.com/sustainability/reporting/key-figures/#supply-chain-sustainability



Indi- cator	Description of requirement	Telenor's disclosure
	ASPECT: ANTI-COMPETITIVE	
	BEHAVIOR	
G4- DMA	Disclosure on Management Approach	Telenor is firmly opposed to corruption in all forms and is committed to doing business in accordance with the highest ethical standards. For Telenor, anti-corruption is not only a legal obligation and an ethical standpoint. Corruption is a threat to business and society in all countries. It undermines legitimate business activities and distorts competition. It ruins reputation and exposes individuals to risks. Fair and level competition is important to society and contributes to increased welfare as well as creating business opportunities for Telenor. Telenor supports fair and open competition in all markets, both nationally and internationally. Telenor's competitiveness in the market shall be based on good products and services at the right price.
		See also: http://www.telenor.com/about-us/corporate-governance/code-of-conduct/
G4-S07	Total number of legal actions for anti- competitive behaviour, anti-trust, and monopoly practices and their outcomes	Telenor Annual Report 2015 -p.122; Note 33; Legal disputes and contingencies
	ASPECT: COMPLIANCE	
G4- DMA	Disclosure on Management Approach	http://www.telenor.com/about-us/corporate-governance/anti-corruption/ http://www.telenor.com/about-us/corporate-governance/ethics-compliance/ Telenor Corporate Governance Report 2015
G4-SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	We have not identified any significant fines or major non-monetary sanctions for non-compliance with laws and regulations within Telenor Group during 2015. Telenor Annual Report 2015 -p.36 – Regulatory Risk
		Telenor holds a 33.05 % economic stake in VimpelCom Ltd. This minority stake is included as an associated company in Telenor's financial reporting. On 18 February 2016, VimpelCom, US and Dutch authorities announced that



Indi- cator	Description of requirement	Telenor's disclosure
		VimpelCom Ltd and VimpelCom's Uzbek subsidiary Unitel LLC had entered into global foreign bribery resolutions with US and Dutch authorities after investigations relating to VimpelCom's business in Uzbekistan and prior dealings with Takilant Ltd. VimpelCom admitted to bribery and violation of books and records rules and will as part of the settlement agreements pay an aggregate of USD 795 million in fines and disgorgements to US and Dutch authorities, and retain an independent corporate monitor for at least three years.
	ASPECT: SUPPLIER ASSESSMENT FOR IMPACTS ON SOCIETY	
G4- DMA	Disclosure on Management Approach	http://www.telenor.com/about-us/our-strategy/ Telenor Annual Report 2015 p. 52 Telenor's ambition is to be a market leader in supply chain sustainability and to make an impact in the local markets through its sustainability efforts. Telenor works to have a consistent focus on supply chain sustainability at all levels. The company's focus on continuous improvement is a long-term activity. Telenor will continue to focus on inspections and audits as well as capacity building and training for suppliers We have a significant impact on the societies where we operate. Providing people with affordable smartphones and internet connectivity is an important catalyst for growth and development. We also have an opportunity to play a role in the digitalization of societies, within areas such as education, health and financial inclusion. In addition, we aim to further improve the way we work with our business environment, with a focus on local regulatory frameworks, societal expectations and stakeholder perceptions.
G4-SO9	Percentage of new suppliers that were screened using criteria for impacts on society	Telenor works towards achieving high standards of business conduct, working conditions and environmental management internally. We expect the same approach from those with whom we do business.



Indi-	Description of requirement	Telenor's disclosure
cator		All suppliers and parties that have a direct contractual relationship with Telenor and offer products or services to Telenor must adhere to our Supplier Conduct Principles. These principles spell out the minimum standards that we expect to see achieved over time. At the end of 2015, 100% of all our 20,600 suppliers are covered by an agreement on Supplier Conduct Principles. During 2015, we carried out 7,900 sustainability inspections and audits among our suppliers. 80% of the inspections were unannounced. In 2015, in 31% of our procurement processes with contract value larger than USD 250,000 we have screened new suppliers using a specified set of sustainability criteria. See also:



Indi- cator	Description of requirement	Telenor's disclosure
	ASPECT: PRODUCT AND SERVICE LABELING	
G4- DMA	Disclosure on Management Approach	Telenor Annual Report 2015 – p.62 http://www.telenor.com/sustainability/responsi ble-business/safe-services/digital-responsibility/ In 2015, Telenor continued during the year to actively run projects in all its business units to deliver safer experiences for children and young adults, making sure new internet users are prepared for connectivity.
G4-PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	Telenor is not aware of any incidents or non- compliances concerning product and service information and labelling in 2015
	ASPECT: CUSTOMER PRIVACY	
G4- DMA	Disclosure on Management Approach	Privacy and data security addressed as material issue in 2015 materiality matrix. http://www.telenor.com/sustainability/reporting /scope-and-principles/ Telenor Group has continued its engagement in the 'Telecommunications Industry Dialogue on Freedom of Expression and privacy', and has a high focus on privacy and freedom of expression. Telenor Annual Report 2015 p.54 and p.55. Our approach is described here: www.telenor.com/privacy Authority Requests for access to electronic communication – country data – May 2015 and Authority Requests for access to electronic
G4-PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	Group wide privacy notice: http://www.telenor.com/sustainability/responsible-business/privacy-and-data-protection/understanding-our-privacy-position/ Telenor is not aware of any substantiated complaints regarding breaches of customer privacy and losses of customer data in 2015.

