

Telenor Group

GRI G4 Report 2014



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 2014 reporting applies the G4 Sustainability Reporting Guidelines.

Our aim has been to achieve alignment to the “Core” option for our 2014 report, with an in-depth and targeted reporting focusing on the most material issues to Telenor. We chose to review our materiality assessment, but found that most changes were of minor importance with no new topics yet exceeding the threshold of materiality. Aligning the report with the new G4-requirements has also helped us identify gaps in the reporting of our management approach, such as our commitment to Innovation and Human Rights

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 [here](#).

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.

Indicator	Description of requirement	Telenor's disclosure
	STRATEGY AND ANALYSIS	
G4-1	Statement from the most senior decision-maker of the organization	Telenor Annual Report 2014 – p.1
G4-2	Description of key impacts, risks, and opportunities.	Telenor Sustainability Report 2014 – p.2
	ORGANISATIONAL PROFILE	
G4-3	Name of the organization.	Telenor Group
G4-4	Primary brands, products, and services.	Telenor Annual Report 2014 -Segment Information -p.46 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 2014 -Segment Information -p.46 and p.136-137 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 2014 -Segment Information -p.46 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 2014 – p.6-7
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 2014 from People & Organisation: http://www.telenor.com/sustainability/reporting/key-figures/#people-organisation

Indicator	Description of requirement	Telenor's disclosure
G4-11	Percentage of total employees covered by collective bargaining agreements.	<p>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.</p> <p>Based on organizational data from Norway, Serbia and Malaysia, at least 25% of all employees in Telenor Group are covered by collective bargaining agreements.</p>
G4-12	Describe the organization's supply chain.	<p>Report on Sustainability in Telenor Annual Report 2014 - p.130, also outlined online: http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/</p>
G4-13	Significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain.	<p>Telenor Annual Report 2014 -Segment Information – p.45-47 Report from the Board of Directors 2014 p.4-23 Telenor Annual Report 2014 - p.43; Acquisitions in 2014</p>
G4-14	Precautionary approach or principle addressed by the organization.	<p>Telenor Annual Report 2014 - p.78; Managing capital and financial risk management Telenor Code of Conduct</p>
G4-15	List externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses.	<p>The most important social charters, principles, or other initiatives to which Telenor subscribes or endorses are:</p> <ul style="list-style-type: none"> • UN Global Compact • GRI • Carbon Disclosure Project • Principles of the World Economic Forum • International Labour Organization (ILO) • UNI Global Union <p>http://www.telenor.com/sustainability/reporting/our-performance/</p>

Indicator	Description of requirement	Telenor's disclosure
G4-16	Memberships of associations (such as industry associations) and national or international advocacy organizations.	<p>Telenor Annual Report 2014 - p.130</p> <p>Telenor is a member of Global e-Sustainability (GeSi) and the Joint Audit Cooperation (JAC).</p> <p>http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/our-approach/</p> <p>Telenor Group joined the future-facing ICT coalition for a safer Internet for Children and Young People in 2012. In 2014, Telenor Group Executive Management called on all Telenor business units to develop their position within the five focus areas pertaining to digital responsibility and child online safety.</p>
<h2 style="color: #0070C0; margin: 0;">IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES</h2>		
G4-17	Entities included in the organization's consolidated financial statements or equivalent documents.	<p>Telenor Annual Report 2014 - p.30 and p.46</p> <p>http://www.telenor.com/sustainability/reporting/</p>
G4-18	Process for defining the report content and the Aspect Boundaries and implementation of the Reporting Principles for defining report content.	<p>Approach to defining report content and materiality matrix is outlined online:</p> <p>http://www.telenor.com/corporate-responsibility/reporting/scope-and-principles/</p>
G4-19	List all the material Aspects identified in the process for defining report content.	<p>Telenor's material aspects</p> <ul style="list-style-type: none"> • Digital responsibility • Enabling services • Data security and privacy • Corporate governance • Service reliability and quality • Ethics and anti-corruption • Sustainable supply chain • Human rights • Internet for all • Our employees

Indicator	Description of requirement	Telenor's disclosure
		<ul style="list-style-type: none"> • Energy efficiency • Innovation • Tax and licences Online: Telenor Materiality Assessment 2013
G4-20	Aspect Boundary within the organization for each material aspect	Telenor Annual Report 2014 -p.46 The aspect boundary for each material aspect has been discussed in the Telenor Materiality assessment process. See Telenor Materiality Assessment 2013 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 2013 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
G4-23	Significant changes from previous reporting periods in the Scope and Aspect Boundaries.	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
	STAKEHOLDER ENGAGEMENT	
G4-24	Stakeholder groups engaged by the organization.	Stakeholders engaged for materiality matrix include 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 stakeholders with whom to engage.	Online: http://www.telenor.com/corporate-responsibility/reporting/scope-and-principles/

Indicator	Description of requirement	Telenor's disclosure
G4-26	Approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.	Online: http://www.telenor.com/investors/ http://www.telenor.com/innovation/youthsummit/ Telenor Materiality Assessment 2013 Sustainability update Myanmar 2014
G4-27	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting. Report the stakeholder groups that raised each of the key topics and concerns.	This is outlined in Telenor's materiality assessment process. Telenor Materiality Assessment 2013 Report on Sustainability in Telenor Annual Report 2014 – p.131
	REPORT PROFILE	
G4-28	Reporting period (such as fiscal or calendar year) for information provided.	Calendar year 2014.
G4-29	Date of most recent previous report (if any).	Previous report published in 2014, covering calendar year 2013.
G4-30	Reporting cycle (such as annual, biennial).	Annual
G4-31	Provide the contact point for questions regarding the report or its contents.	Jan Kristensen / Eyvind Lome E-mail: sustainability@telenor.com
G4-32	'In accordance' option chosen. GRI Content Index for the chosen option. Reference to the External Assurance Report.	GRI Sustainability Reporting Guidelines G4-Core. The GRI index can be found here: http://www.telenor.com/sustainability/reporting/gri-index/ 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.
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.

Indicator	Description of requirement	Telenor's disclosure
	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 2014 - p.19
G4-35	Process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees.	Telenor Annual Report 2014 - p.19
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 2014 - p.19. 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 Report on Corporate Governance 2014 -p.13 Ethics and Sustainability Committee.
G4-38	Composition of the highest governance body and its committees.	Telenor Annual Report 2014 - p.4 and 19 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.19-20 the Telenor Annual Report 2014 , 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.

Indicator	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/
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.	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 economic, environmental and social impacts, risks, and opportunities.	http://www.telenor.com/about-us/corporate-governance/
G4-46	Highest governance body's role in reviewing the effectiveness of the organization's risk management processes for economic, environmental and social topics.	http://www.telenor.com/about-us/corporate-governance/
G4-47	Frequency of the highest governance body's review of economic, environmental and social impacts, risks, and opportunities.	http://www.telenor.com/about-us/corporate-governance/

Indicator	Description of requirement	Telenor's disclosure
G4-48	Highest committee or position that formally reviews and approves the organization's sustainability report and ensures that all material Aspects are covered.	http://www.telenor.com/about-us/corporate-governance/ and Report on Corporate Governance 2014 -p.13 Ethics and Sustainability Committee.
G4-49	Report the process for communicating critical concerns to the highest governance body.	Telenor Code of Conduct
G4-50	Report the nature and total number of critical concerns that were communicated to the highest governance body and the mechanism(s) used to address and resolve them.	Telenor Annual Report 2014 - p.78; Managing capital and financial risk management http://www.telenor.com/about-us/corporate-governance/
G4-51	Remuneration policies for the highest governance body and senior executives for the below types of remuneration: <ul style="list-style-type: none"> • Fixed pay and variable pay: <ul style="list-style-type: none"> • Performance-based pay • Equity-based pay • Bonuses • Deferred or vested shares • Sign-on bonuses or recruitment incentive payments • Termination payments • Clawbacks • Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees" <p>How performance criteria in the remuneration policy relate to the highest governance body's and senior executives' economic, environmental and social objectives.</p>	Telenor Annual Report 2014 – note 34 Remuneration policy -p.90 Telenor Annual Report 2014 – p.19 With regard to remuneration issues, the Governance and Remuneration Committee considers Telenor's remuneration policy and programs, including bonus programmes and share-based schemes, and presents 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. Report whether remuneration consultants are involved in determining remuneration and whether they are independent of management. Report any other relationships which the remuneration consultants have with the organization.	Telenor Annual Report 2014 – note 34 Remuneration policy -p.90

Indicator	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 proposals, if applicable.	Telenor Annual Report 2014 – note 34 Remuneration policy -p.90
G4-54	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 2014 – note 34 Remuneration policy -p.90
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 2014 – note 34 Remuneration policy -p.90
	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.	<p>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</p> <p>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 Report on Corporate Governance 2014</p>

Indicator	Description of requirement	Telenor's disclosure
G4-57	Internal and external mechanisms for seeking advice on ethical and lawful behavior, 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 & Compliance Officers or the Group Ethics & Compliance Officer.
G4-58	Internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation through line management, whistleblowing mechanisms or hotlines.	<p>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.</p> <p>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.</p>

SPECIFIC STANDARD DISCLOSURES

Indicator	Description of requirement	Telenor's disclosure
	CATEGORY: ECONOMIC ASPECT: ECONOMIC PERFORMANCE	
G4- DMA	Disclosure on Management Approach	Telenor Annual Report 2014 - p.4-23
G4-EC1	Direct economic value generated and distributed	Telenor Annual Report 2014 - p.24 and p.46
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. Report on Sustainability in Telenor Annual Report 2014 - p.129
G4- EC3	Coverage of the organization's defined benefit plan obligations	Telenor Annual Report 2014 -p.72-74 and p.96
	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 "Enabling services" on page 131 and section "Economic contribution to society" on page 133 in Telenor Annual Report 2014
	ASPECT: PROCUREMENT PRACTICES	
G4-DMA	Disclosure on Management Approach	Defining Materiality : http://www.telenor.com/sustainability/reporting/scope-and-principles/

Indicator	Description of requirement	Telenor's disclosure
		<p>Telenor's Board of Directors has adopted a set of Supplier Conduct Principles that all contracting parties are required to adhere to.</p> <p>Telenor carried out supplier inspections across the Group.</p>
G4- EC9	Proportion of spending on local suppliers at significant locations of operation	<p>Identified omission: Percentage is not disclosed.</p> <p>Reason for omission: Telenor promotes fair competition through transparent and professional sourcing processes and equal treatment of all suppliers. Telenor optimises its global sourcing power to exploit market opportunities and thereby obtaining more attractive total cost of ownership. All local business units shall use group standards, processes and agreements where they are established. Suppliers in competition for contracts with Telenor shall be able 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.</p> <p>See also: http://www.telenor.com/about-us/corporate-governance/code-of-conduct/ and section "Ethics and anti-corruption" on page 129 in Telenor Annual Report 2014</p>
	<p>CATEGORY: ENVIRONMENTAL</p> <p>ASPECT: ENERGY</p>	
G4- DMA	Disclosure on Management Approach	<p>Report on Sustainability in Telenor Annual Report 2014 – p.129 - Climate and environment</p> <p>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.</p>
G4-EN3	Energy consumption within the organization	<p>Reported figures are for total Telenor Group in the financial year 2014.</p> <ul style="list-style-type: none"> • Total fuel consumption from non-renewable sources: 1197 GWh • Total fuel consumption from renewable fuel sources: 9 GWh • Total electricity consumption: 1971 GWh • Total heating/cooling consumption: 36 GWh • Total energy consumption: 3217 GWh

Indicator	Description of requirement	Telenor's disclosure
		<ul style="list-style-type: none"> • Telenor did not sell any electricity or heating/cooling during 2013. • Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: https://www.cdp.net/en-US/Results/Pages/Responses.aspx?Search=True&Keyword=telenor <p>Telenor's total GHG emissions and energy consumptions for 2013 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.</p> <p>See also: http://www.telenor.com/sustainability/reporting/key-figures/climate-change/</p>
G4-EN5	Energy intensity	<p>Reported figures are for total Telenor Group in the financial year 2014.</p> <ul style="list-style-type: none"> • Energy intensity ratio for all our business units- where the ratio denominator is total revenues: 190 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: https://www.cdp.net/en-US/Results/Pages/Responses.aspx?Search=True&Keyword=telenor <p>Telenor's total GHG emissions and energy consumptions for 2014 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.</p> <p>See also: http://www.telenor.com/sustainability/reporting/key-figures/climate-change/</p>

Indicator	Description of requirement	Telenor's disclosure
G4- EN6	Reduction of energy consumption	<p>Reported figures are for total Telenor Group in the financial year 2014.</p> <ul style="list-style-type: none"> • Total amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives: 75 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: https://www.cdp.net/en-US/Results/Pages/Responses.aspx?Search=True&Keyword=telenor <p>Telenor's total GHG emissions and energy consumptions for 2014 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/</p>
	ASPECT: EMISSIONS	
G4-DMA	Disclosure on Management Approach	Report on Sustainability in Telenor Annual Report 2014 - p.129
G4-EN15	Direct Greenhouse Gas (GHG) emissions (Scope 1)	<p>Reported figures are for total Telenor Group in the financial year 2014.</p> <ul style="list-style-type: none"> • Total gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent for all our business units: 0.265 million tonnes • Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: https://www.cdp.net/en-US/Results/Pages/Responses.aspx?Search=True&Keyword=telenor • We use financial control as consolidation approach for our reported

Indicator	Description of requirement	Telenor's disclosure
		<p>emissions: All operating business units where Telenor is a majority owner (owner of more than 50% of the shares).</p> <p>Telenor's total GHG emissions and energy consumptions for 2014 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.</p> <p>See also: http://www.telenor.com/sustainability/reporting/key-figures/climate-change/</p>
G4-EN16	Energy indirect Greenhouse Gas (GHG) emissions (scope 2)	<p>Reported figures are for total Telenor Group in the financial year 2014.</p> <ul style="list-style-type: none"> • Total gross energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent for all our business units: 0.782 million tonnes • Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: https://www.cdp.net/en-US/Results/Pages/Responses.aspx?Search=True&Keyword=telenor • 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>Telenor's total GHG emissions and energy consumptions for 2014 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.</p> <p>See also: http://www.telenor.com/sustainability/reporting/key-figures/climate-change/</p>
G4-EN17	Other Indirect Greenhouse Gas (GHG) emissions (Scope 3)	<p>Reported figures are for total Telenor Group in the financial year 2014.</p> <ul style="list-style-type: none"> • Total gross other indirect (Scope 3) GHG emissions in metric tons of CO2 equivalent for all our business units: 0.023 million tonnes • Boundaries/scoping, standards, methodologies, conversion factors and other

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		<p>assumptions used as reported to CDP: https://www.cdp.net/en-US/Results/Pages/Responses.aspx?Search=True&Keyword=telenor</p> <ul style="list-style-type: none"> 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>Telenor's total GHG emissions and energy consumptions for 2014 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.</p> <p>See also: http://www.telenor.com/sustainability/reporting/key-figures/climate-change/</p>
G4-EN18	Greenhouse Gas (GHG) emissions intensity	<p>Reported figures are for total Telenor Group in the financial year 2014.</p> <ul style="list-style-type: none"> GHG emissions intensity ratio for all our business units- where the ratio denominator is total revenues: 0.063 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: https://www.cdp.net/en-US/Results/Pages/Responses.aspx?Search=True&Keyword=telenor <p>Telenor's total GHG emissions and energy consumptions for 2014 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.</p> <p>See also: http://www.telenor.com/sustainability/reporting/key-figures/climate-change/</p>

Indicator	Description of requirement	Telenor's disclosure
G4-EN19	Reduction of Greenhouse Gas (GHG) emissions	<p>Reported figures are for total Telenor Group in the financial year 2014.</p> <ul style="list-style-type: none"> Total amount of GHG emissions reductions achieved as a direct result of initiatives to reduce emissions, in metric tons of CO2 equivalent: 0.001 million tonnes Baseline/base year: 1.022 million tonnes CO2 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: https://www.cdp.net/en-US/Results/Pages/Responses.aspx?Search=True&Keyword=telenor 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>Telenor's total GHG emissions and energy consumptions for 2014 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol.</p> <p>See also: http://www.telenor.com/sustainability/reporting/key-figures/climate-change/</p>
	ASPECT: SUPPLIER ENVIRONMENTAL ASSESSMENT	
G4-DMA	Disclosure on Management Approach	<p>Report on Sustainability in Telenor Annual Report 2014 - p.130</p> <p>Telenor Group will experience continued growth in total energy consumption due increasing energy-demanding mobile broadband services.</p> <p>Telenor Group applies a Sustainability Criteria checklist during the procurement process to check suppliers for issues relating to their environmental management</p>

Indicator	Description of requirement	Telenor's disclosure
		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	Report on Sustainability in Telenor Annual Report 2014 - p.130 In 2014, in 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>CATEGORY: SOCIAL</p> <p>SUB-CATEGORY: LABOUR PRACTICES AND DECENT WORK</p> <p>ASPECT: EMPLOYMENT</p>	
G4-DMA	Disclosure on Management Approach	Telenor Annual Report 2014 p.10
G4-LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	Practices related to Norwegian entities: As a general principle Telenor is offering equal benefits, to full-time, part-time and temporary 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.
	<p>ASPECT: OCCUPATIONAL HEALTH AND SAFETY</p>	
G4-DMA	Disclosure on Management Approach	Telenor Annual Report 2014 p.131 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 Environment (HSSE) practices throughout the Group, as well as Telenor's processes and performance for HSSE and sustainability in the supply chain. - Telenor Annual Report 2014 p.21
G4-LA7	Workers with high incidence or high risk of diseases related to their	Telenor Annual Report 2014 -p.131

Indicator	Description of requirement	Telenor's disclosure
	occupation	<p>Telenor faces a range of OHS&S related challenges in the markets it operates, e.g. traffic-related incidents.</p> <p>A total of 4 fatalities have been reported in the Supply Chain during 2014. In Bangladesh, two employees of a distributor died in a traffic accident in February and in November one employee of a security company was killed when crossing the street. In Myanmar in December, a tower construction worker was killed from a work related injury to the head during a tower erection process.</p>
	ASPECT: TRAINING AND EDUCATION	
G4 – DMA	Disclosure on Management Approach	<p>Telenor Annual Report 2014 p.10 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.</p> <p>Telenor provides interactive training modules on anti-corruption, ethical dilemmas, and mandatory introduction to Code of Conduct. Telenor has also strengthened their portfolio of on-boarding tools and training.</p> <p>Telenor measures the number of employees and in-house contractors that have attended awareness training.</p>
G4 –LA10	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	See section "People Development" on page 10 in Telenor Annual Report 2014
	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 17 in Telenor Annual Report 2014 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

Indicator	Description of requirement	Telenor's disclosure
		<p>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.</p> <p>http://www.telenor.com/about-us/corporate-governance/ethics-compliance/</p>
G4- LA14	Percentage of new suppliers that were screened using labor practices criteria	The Business Units evaluate the SCP Risk for any existing or potential Supplier and/or its Sub Suppliers. 99% of new suppliers were screened using labour practices criteria
	<p>SUB-CATEGORY: HUMAN RIGHTS</p> <p>ASPECT: INVESTMENT</p>	
G4-DMA	Disclosure on Management Approach	<p>http://www.telenor.com/wp-content/uploads/2014/04/Telenor-Group-Annual-Report-2013.pdfTelenor Annual Report 2014 - p.18 and 126</p> <p>http://www.telenor.com/sustainability/responsible-business/human-rights/respect/</p> <p>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.</p>
G4-HR1	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	<p>99 % of all suppliers, about 17 600 suppliers to Telenor Group have signed an Agreement on Responsible Business Conduct.</p> <p>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.</p> <p>Report on Sustainability in Telenor Annual Report 2014 - p.130</p>
	<p>ASPECT: NON-DISCRIMINATION</p>	
G4-DMA	Disclosure on Management Approach	See section "Human Rights" on page 126 Telenor Annual Report 2014

Indicator	Description of requirement	Telenor's disclosure
G4- HR3	Total number of incidents of discrimination and corrective actions taken	<p>For the year 2014 there were 394 incidents reported and investigated. The three categories with the highest number of reported incidents were theft and embezzlement (91), working environment (46) and confidentiality (42).</p> <p>See also section "Ethics and anti-corruption" in Telenor Annual Report 2014 p. 128</p>
	ASPECT: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING	
G4-DMA	Disclosure on Management Approach	http://www.telenor.com/sustainability/responsible-business/human-rights/respect/Report on Sustainability in Telenor Annual Report 2014 - p.128
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	<p>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.</p> <p>The risk is greater in our operations in Asia, especially manufacturing and work intensive production companies etc.</p> <p>Telenor believes in employee involvement, through dialogue with employees or their recognized employee representatives. We have established a framework with the purpose to further build a sustainable culture on respect for labour rights, through focusing on employee involvement.</p> <p>Report on Sustainability in Telenor Annual Report 2014 - p.128 and p.130</p>

Indicator	Description of requirement	Telenor's disclosure
	ASPECT: CHILD LABOUR	
G4-DMA	Disclosure on Management Approach	<p>Report on Sustainability in Telenor Annual Report 2014 - p.130</p> <p>Our approach; http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/our-approach/</p> <p>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.</p>
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	<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 & awareness sessions/supplier conferences organised locally.</p>

Indicator	Description of requirement	Telenor's disclosure
	ASPECT: FORCED OR COMPULSORY LABOUR	
G4-DMA	Disclosure on Management Approach	<p>http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/</p> <p>See section Sustainable Supply chain in Report on Sustainability in Telenor Annual Report 2014 - p.130</p> <p>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.</p> <p>Ref: G4-HR5 above</p>
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	<p>http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/</p> <p>See section Sustainable Supply chain in Report on Sustainability in Telenor Annual Report 2014 - p.130</p> <p>Ref: G4-HR5 above</p>
	ASPECT: SECURITY PRACTICES	
G4-DMA	Disclosure on Management Approach	<p>The safety and security of our personnel is a key priority for Telenor, as defined in our policy framework.</p> <p>http://www.telenor.com/sustainability/responsible-business/health-safety-and-security/</p> <p>We always seek to ensure the safety and liberty of company personnel who may be placed at risk. See http://www.telenor.com/sustainability/responsible-business/human-rights/mitigate/telenors-status-on-industry-dialogue-guiding-principles/</p>

Indicator	Description of requirement	Telenor's disclosure
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. Reason for omission: Telenor's ambition is that all security personnel, directly or indirectly employed, shall have performed internal HSE training, where human rights and OHS issues are part of training. As all Telenor companies shall have HSE management system according to OHSAS 18001, the follow up and training is part of the management system processes.
	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/
G4-HR8	Total number of incidents of violations involving rights of indigenous peoples and actions taken	In 2014 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. Telenor Sustainability Report 2014 - p. 3. Further we conduct assessments related to e.g. specific projects, entry into new markets.

Indicator	Description of requirement	Telenor's disclosure
	<p>ASPECT: SUPPLIER HUMAN RIGHTS ASSESSMENT</p>	
G4-DMA	Disclosure on Management Approach	<p>http://www.telenor.com/sustainability/supply-chain-sustainability/supplier-engagement/</p> <p>Report on Sustainability in Telenor Annual Report 2014 - p.130</p>
G4-HR10	Percentage of new suppliers that were screened using human rights criteria	<p>http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/the-requirements/</p> <p>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.</p> <p>All suppliers are required to enter into a contract titled Agreements on Responsible Business Conduct (ABC) which legally binds the suppliers to the Supplier Conduct Principles covering human rights.</p>
	<p>ASPECT: HUMAN RIGHTS GRIEVANCE MECHANISMS</p>	
G4-DMA	Disclosure on Management Approach	<p>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.</p> <p>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.</p>

Indicator	Description of requirement	Telenor's disclosure
		See also: http://www.telenor.com/sustainability/responsible-business/human-rights/ and Report on Corporate Governance 2014
G4-HR12	Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms	For the year 2014 there were 394 incidents reported and investigated. The three categories with the highest number of reported incidents were theft and embezzlement (91), working environment (46) and confidentiality (42). See also section "Ethics and anti-corruption" in Telenor Annual Report 2014 p. 128
	SUB-CATEGORY: SOCIETY ASPECT: ANTI-CORRUPTION	
G4-DMA	Disclosure on Management Approach	Report on Sustainability in Telenor Annual Report 2014 - p.128-129 and Telenor Group Report on Corporate Governance 2014 p. 17 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 , see also http://www.telenor.com/media/articles/2013/new-anti-corruption-handbook-released-today/ and Web App
G4-SO4	Communication and training on anti-corruption policies and procedures	Telenor is firmly committed to build and promote ethical values and behaviour within identified challenge areas. These values need to be communicated to and anchored with key individuals and we must find ways to make them part of our everyday culture. A key element in the Anti-Corruption Program is capacity-building and regular training of all employees. Our anti-corruption training ranges from e-learning programs, dilemma-training modules and other "Telenor Way" awareness activities. Telenor

Indicator	Description of requirement	Telenor's disclosure
		<p>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 2014, the Telenor Anti-Corruption Handbook was launched with a web-based app for smartphones, tablets and laptops. The app is publicly available on telenor.com: http://www.telenor.com/media/articles/2014/download-our-anti-corruption-app</p> <p>During 2014, 32% of all employees in Telenor Group have attended refresher courses related to our Codes of Conduct and ethics.</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 2014, more than 19,000 employees and in-house contractors attended HSSE related awareness training sessions covering both Occupational Health, Safety and Security as well as Anti-corruption. At the end of 2014, 99% of all our about 17,600 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: http://www.telenor.com/sustainability/reporting/key-figures/#supply-chain-sustainability</p>
	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

Indicator	Description of requirement	Telenor's disclosure
		<p>business and society in all countries. It undermines legitimate business activities and distorts competition. It ruins reputation and exposes individuals to risks.</p> <p>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.</p> <p>See also: http://www.telenor.com/about-us/corporate-governance/code-of-conduct/</p>
G4-SO7	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes	<p>Telenor Annual Report 2014 –p.86; Note 33; Legal disputes and contingencies</p>
	ASPECT: COMPLIANCE	
G4-DMA	Disclosure on Management Approach	<p>http://www.telenor.com/about-us/corporate-governance/anti-corruption/ http://www.telenor.com/about-us/corporate-governance/ethics-compliance/ Report on Corporate Governance 2014</p>
G4-SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	<p>We have not identified any significant fines or major non-monetary sanctions for non-compliance with laws and regulations within Telenor Group during 2014.</p>
	ASPECT: SUPPLIER ASSESSMENT FOR IMPACTS ON SOCIETY	
G4-DMA	Disclosure on Management Approach	<p>http://www.telenor.com/about-us/our-strategy/ Report on Sustainability in Telenor Annual Report 2014 - p.130</p> <p>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.</p>

Indicator	Description of requirement	Telenor's disclosure
		<p>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</p> <p>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.</p>
G4-SO9	Percentage of new suppliers that were screened using criteria for impacts on society	<p>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.</p> <p>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.</p> <p>At the end of 2014, 99% of all our 17 600 suppliers are covered by an agreement on Supplier Conduct Principles.</p> <p>During 2014, we carried out 5 292 sustainability inspections and audits among our suppliers.</p> <p>In 2014, in 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. See also: http://www.telenor.com/sustainability/reporting/key-figures/#supply-chain-sustainability</p>

Indicator	Description of requirement	Telenor's disclosure
	SUB-CATEGORY: PRODUCT RESPONSIBILITY ASPECT CUSTOMER HEALTH AND SAFETY	
G4-DMA	Disclosure on Management Approach	Telenor Group is committed to delivering products and services that can be used safely. http://www.telenor.com/sustainability/safe-services/digital-responsibility/ http://www.telenor.com/sustainability/human-rights/privacy-and-freedom-of-expression/ Telenor Annual Report 2014 – p.131
G4-PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes.	We have not identified any incidents or non-compliances with H&S regulations and applicable standards in 2014
	ASPECT: PRODUCT AND SERVICE LABELLING	
G4-DMA	Disclosure on Management Approach	Report on Sustainability in Telenor Annual Report 2014 – p.134 http://www.telenor.com/sustainability/responsible-business/safe-services/digital-responsibility/ In 2014, Telenor Group Executive Management called on all Telenor business units to develop their position within the five focus areas pertaining to digital responsibility and child online safety.
G4-PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes.	Telenor is not aware of any incidents or non-compliances concerning product and service information and labelling in 2014
	ASPECT: CUSTOMER PRIVACY	
G4-DMA	Disclosure on Management Approach	Safe services and privacy addressed as material issue in 2013 materiality matrix. http://www.telenor.com/sustainability/reporting/scope-and-principles/

Indicator	Description of requirement	Telenor's disclosure
		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 Sustainability Report 2014 - p. 3 and p. 8. Our approach is described here: www.telenor.com/privacy
G4-PR8	Total number of substantiated complaints regarding 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 2014.