



GRI Report 2016



Telenor Group Report 2016

GRI Sustainability Reporting Standards

'In accordance – Core'



Preface

Telenor Group supports the Global Reporting Initiative (GRI) – as an Organisational Stakeholder – and its initiatives to drive sustainability reporting. Telenor Group reports – and has done so since 2002 – in accordance with the GRI Sustainability Reporting Guidelines. The 2016 report applies the new GRI Sustainability Reporting Standards.

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

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

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

External Assurance

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

References in the column UN Global Compact

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

SDG 1-17: Sustainable Development Goals

GRI CONTENT INDEX 2016

GRI standard	Standard disclosure	Telenor response	UN Global Compact
GRI 101 Foundation 2016	GRI 101 does not include any disclosures		
GRI 102 General Disclosures 2016			
1. ORGANIZATIONAL PROFILE			
102-1	Name of the organization	Telenor Group	
102-2	Activities, brands, products, and services	http://www.telenor.com/about-us/our-business/	
102-3	Location of headquarters	Oslo, Norway	
102-4	Location of operations	Telenor Annual Report 2016-Segment information -p.87 and p.68-69 and http://www.telenor.com/about-us/global-presence/	
102-5	Ownership and legal form	http://www.telenor.com/about-us/corporate-governance/articles-of-association/	
102-6	Markets served	Telenor Annual Report 2016-Segment information -p.87 and http://www.telenor.com/about-us/our-business/	
102-7	Scale of the organization	Telenor Annual Report 2016 – p.22 - 40	
102-8	Information on employees and other workers	Reported key figures 2016 from Group People http://www.telenor.com/sustainability/reporting/key-figures/#people-organisation -and see Country by Country Report in Telenor Annual Report 2016 – p.68	
102-9	Supply chain	Telenor Annual Report 2016 – p.53-54, also outlined online: http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/	
102-10	Significant changes to the organization and its supply chain	Telenor Annual Report 2016-Segment information -p.87 Report from the Board of Directors 2016 p.22-40 Telenor Annual Report 2016 - p.106; Acquisitions and disposals	
102-11	Precautionary Principle or approach	Telenor Annual Report 2016 - Note 18; p.118; Managing capital and financial risk management Telenor Code of Conduct	
102-12	External initiatives	The most important social charters, principles, or other initiatives to which Telenor subscribes or endorses are: <ul style="list-style-type: none"> • 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 Telenor's alignment with the Industry Dialogue Guiding Principles 2016	

GRI standard	Standard disclosure	Telenor response	UN Global Compact
102-13	Membership of associations	<ul style="list-style-type: none"> • 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 	
2. STRATEGY			
102-14	Statement from senior decision-maker	Telenor Annual Report 2016 – p.4-5 and online http://www.telenor.com/sustainability/	
3. ETHICS AND INTEGRITY			
102-16	Values, principles, standards, and norms of behavior	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. Ethics & Compliance Hotline	Principle 10 SDG 16
102-17	Mechanisms for advice and concerns about ethics	<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> <p>Ethics & Compliance Hotline</p>	Principle 10 SDG 16
4. GOVERNANCE			
102-18	Report the governance structure of the organization, including committees of the highest governance body. Committees responsible for decision-making on economic, environmental, and social topics.	Telenor Corporate Governance Report 2016 Web: Corporate Governance ; Group Executive Management	
5. STAKEHOLDER ENGAGEMENT			
102-40	List of stakeholder groups	Stakeholders engaged for materiality matrix include policy makers, investors, employees, community & media, customers and NGOs-	

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		outlined online: http://www.telenor.com/corporate-responsibility/reporting/scope-and-principles/	
102-41	Collective bargaining agreements	For practical reasons all employees in Telenor in Norway are covered by collective agreement, either directly as member of a recognised union in Telenor or indirectly as non-union member based on the legal principle of invariability. In the rest of European region there are recognised unions with collective agreements in 4 additional of our total 7 operations. In Asia there is a recognized union with collective agreement in our Malaysian operation. Based on organizational data from Norway, Serbia and Malaysia, at least 25% of all employees in Telenor Group are covered by collective bargaining agreements.	SDG 8
102-42	Identifying and selecting stakeholders	http://www.telenor.com/corporate-responsibility/reporting/scope-and-principles/	
102-43	Approach to stakeholder engagement	Telenor Annual Report 2016 – p.16 and 46 http://www.telenor.com/investors/ http://www.telenor.com/innovation/youthsummit/ Telenor Materiality Assessment 2015 Sustainability Seminar Myanmar 2016	
102-44	Key topics and concerns raised	This is outlined in Telenor's materiality assessment process. Telenor Materiality Assessment 2015 Telenor Annual Report 2016 – p. 46	
6. REPORTING PRACTICE			
102-45	Entities included in the consolidated financial statements	Telenor Annual Report 2016 – p.76 and p.87 http://www.telenor.com/sustainability/reporting/	
102-46	Defining report content and topic Boundaries	Approach to defining report content and materiality matrix is outlined online: http://www.telenor.com/corporate-responsibility/reporting/scope-and-principles/	
102-47	List of material topics	Telenor's material aspects <ul style="list-style-type: none"> • Human rights • Ethics and anti-corruption • Privacy and Data Security • Corporate governance • Service reliability and quality • Supply chain sustainability • Digital access and outreach • Transparency and stakeholder engagement • Labour rights and standards • Economic contribution to society • Child online safety • Innovating and researching for shared value • Mobiles phones and health • Environment and Climate Change 	

GRI standard	Standard disclosure	Telenor response	UN Global Compact
102-48	The effect of any restatements of information given 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	
102-49	Changes in reporting	No significant changes from previous year	
102-50	Reporting period	Calendar year 2016	
102-51	Date of most recent report	Previous report published in 2016, covering calendar year 2015.	
102-52	Reporting cycle	Annual	
102-53	Contact point for questions regarding the report	Jan Kristensen / Eyvind Lome E-mail: sustainability@telenor.com	
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option	
102-55	GRI content index	The GRI index can be found here: http://www.telenor.com/sustainability/reporting/gri-index/	
102-56	External assurance	An independent assurance of the content of this report has been done for the information regarding energy consumption and climate emissions. The assurance has been done by DNV-GL Business Assurance.	
GRI 103: MANAGEMENT APPROACH 2016			
103-1	Explanation of the material topic and its Boundary	See separate report page 16 in this document	
103-2	The management approach and its components	See separate report page 16 in this document	
103-3	Evaluation of the management approach	See separate report page 16 in this document	
GRI 201: ECONOMIC PERFORMANCE 2016			
201-1	Direct economic value generated and distributed	Telenor Annual Report 2016 - p.70 and p.87	SDG 2, 5, 7, 8, 9, 10
201-2	Financial implications and other risks and opportunities due to climate change	In terms of climate-related regulator risks, Telenor may face higher operational costs related to carbon taxes, rising energy prices and internationally binding agreements. Climate-related physical risks may cause disruptions or catastrophic damage to infrastructure, such as network base stations and electrical power lines. Telenor Annual Report 2016 - p.58	Principle 7
201-3	Defined benefit plan obligations and other retirement plans	Telenor Annual Report 2016 -note 25 - Pension obligations- p.112-114 and Remuneration principles p.132	
GRI 203: INDIRECT ECONOMIC IMPACTS 2016			
203-1	Infrastructure investments and services supported	Telenor Annual Report 2016 – p. 13 Our Global Impact and p. 67 Economic Contribution to Society	SDG 2, 5, 7, 9, 10, 11

GRI standard	Standard disclosure	Telenor response	UN Global Compact
203-2	Significant indirect economic impacts	See section “How Telenor impact societies” on page 67 and “Innovating and Researching for Shared Value” on page 64 in Telenor Annual Report 2016	SDG 1, 2, 3, 8, 10, 17
GRI 204: PROCUREMENT PRACTICES 2016			
204-1	Proportion of spending on local suppliers	<p>Identified omission: Percentage is not disclosed. Reason for omission: Telenor promotes fair competition through transparent and professional sourcing processes and equal treatment of all suppliers. Telenor optimises its global sourcing power to exploit market opportunities and thereby obtaining more attractive total cost of ownership. All local business units shall use group standards, processes and agreements where they are established. Suppliers in competition for contracts with Telenor shall be able to trust our selection processes.</p> <p>As a result we do not report the percentage of the procurement budget used for significant locations of operation spent on suppliers local to that operation.</p> <p>See also: http://www.telenor.com/about-us/corporate-governance/code-of-conduct/ and section “Ethics and anti-corruption” on page 47 in Telenor Annual Report 2016</p>	SDG 1, 5, 8, 10
GRI 205: ANTI-CORRUPTION 2016			
205-2	Communication and training about anti-corruption policies and procedures	<p>A key element in the Anti-Corruption Programme is capacity-building and regular training of employees. Our anti-corruption training ranges from e-learning programs, dilemma-training and other “Telenor Way” awareness activities.</p> <p>The Code of Conduct must be signed by all employees upon joining the company. From 2016 onwards, the Code of Conduct is signed annually in the HR management system. A new mandatory global Code of Conduct online learning module was introduced in February 2016 to accompany the signing process.</p> <p>A new web-based Ethics and Compliance Hotline was launched in January 2016. The Hotline is a confidential channel where anyone can ask questions and raise concerns about possible breaches of Telenor’s Code of Conduct, including relevant laws, regulations and governing documents. See also Telenor Annual Report 2016 p. 49</p> <p>Integrity is a vital part of Telenor’s business. We recognize that our business partners, whether</p>	Principle 10 SDG 16

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		<p>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 2016, Telenor performed more than 35,000 Man-hours training of suppliers' employees covering Occupational, Health, Safety and Security as well as Anti-corruption. At the end of 2016, 100% of all our about 22,800 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</p>	
GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016			
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Telenor Annual Report 2016 –p.125; Note 33; Legal disputes and contingencies	
GRI 302: ENERGY 2016			
302-1	Energy consumption within the organization	<p>For the indicators 302-1, 302-3 and 302-4; Telenor's total GHG emissions and energy consumptions for 2016 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> <p>Reported figures are for total Telenor Group in the financial year 2016.</p> <ul style="list-style-type: none"> • Total fuel consumption from non-renewable sources: 1715 GWh • Total electricity consumption: 2163 GWh • Total heating/cooling consumption: 19 GWh • Total energy consumption: 3983 GWh • Telenor did not sell any electricity or heating/cooling during 2016. • Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP. 	Principle 7, 8, 9 SDG 10, 13
302-3	Energy intensity	Reported figures are for total Telenor Group in the financial year 2016.	Principle 7, 8, 9

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		<ul style="list-style-type: none"> • Energy intensity ratio for all our business units- where the ratio denominator is total revenues: 255 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/ 	SDG 10, 13
302-4	Reduction of energy consumption	<p>Reported figures are for total Telenor Group in the financial year 2016.</p> <ul style="list-style-type: none"> • Total amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives: 22 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/ 	Principle 7, 8, 9 SDG 10, 13
GRI 305: EMISSIONS 2016			
305-1	Direct (Scope 1) GHG emissions	<p>For the indicators 305-1, 305-2,305- 3,305- 4 and 305-5; Telenor’s total GHG emissions and energy consumptions for 2016 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> <p>Reported figures are for total Telenor Group in the financial year 2016.</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: 0.378 million tonnes • Boundaries/scoping, standards, 	Principle 7, 8, 9 SDG 10, 13

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		<p>methodologies, conversion factors and other assumptions used as reported to CDP: http://www.telenor.com/sustainability/reporting/our-performance/</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). 	
305-2	Energy indirect (Scope 2) GHG emissions	<p>Reported figures are for total Telenor Group in the financial year 2016.</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: 0.952 million tonnes (location based) 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). 	Principle 7, 8, 9 SDG 10, 13
305-3	Other indirect (Scope 3) GHG emissions	<p>Reported figures are for total Telenor Group in the financial year 2016.</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: 0.031 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). 	Principle 7, 8, 9 SDG 10, 13
305-4	GHG emissions intensity	<p>Reported figures are for total Telenor Group in the financial year 2016.</p> <ul style="list-style-type: none"> GHG emissions intensity ratio for all our business units- where the ratio denominator is total revenues: 0.087 million tonnes CO₂/ billions of USD All our reported fuel, electricity, heating/cooling consumptions are included in the GHG emissions intensity ratio. 	Principle 7, 8, 9 SDG 10, 13

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		<ul style="list-style-type: none"> 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/ 	
305-5	Reduction of GHG emissions	<p>Reported figures are for total Telenor Group in the financial year 2016.</p> <ul style="list-style-type: none"> The total amount of GHG emissions has <u>increased</u> as a net effect of initiatives to reduce emissions but with increased business scope (more customers and more data traffic), in metric tons of CO2 equivalent: 0.296 million tonnes Baseline/base year: 1.065 million tonnes CO2 in 2013 (all business units except for the new entities in Bulgaria & Myanmar) 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). 	Principle 7, 8, 9 SDG 10, 13
GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016			
308-1	New suppliers that were screened using environmental criteria	<p>Telenor Annual Report 2016 - p.60</p> <p>In 2016, in more than 70 % of our procurement processes with contract value larger than USD 250,000 we have screened new suppliers using a specified set of sustainability criteria.</p>	Principle 7, 8, 9 SDG 13
GRI 401: EMPLOYMENT 2016			
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	<p>Practices related to Norwegian entities:</p> <p>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.</p> <p>The HQ has also the substantially largest employee group.</p>	Principle 6 SDG 8
GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2016			
403-3	Workers with high incidence or high risk of diseases related to their occupation	<p>Telenor Annual Report 2016 p.52</p> <p>Telenor faces a range of OHS&S related challenges in the markets it operates, e.g. traffic-related incidents.</p>	SDG 8

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		There were three work-related employee or in-house contractor fatalities reported in Telenor Group for 2016. All three was related to traffic, two in Pakistan and one in India.	
GRI 404: TRAINING AND EDUCATION 2016			
404-2	Programs for upgrading employee skills and transition assistance programs	See section Telenor Annual Report 2016 p. 29-30, 49 and 53	Principle 6 SDG 4, 5, 8,10
404-3	Percentage of employees receiving regular performance and career development reviews	All employees shall receive regular performance and career development reviews regardless of category and gender. This is a global group requirement.	Principle 6 SDG 4, 5, 8, 10
GRI 406: NON-DISCRIMINATION 2016			
406-1	Incidents of discrimination and corrective actions taken	Telenor Annual Report 2016 p. 50	Principle 6 SDG 5, 10, 16
GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING 2016			
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	<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>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 on respect for labour rights.</p> <p>Telenor Annual Report 2016 - p.51</p>	Principle 3 SDG 8

GRI standard	Standard disclosure	Telenor response	UN Global Compact
GRI 408: CHILD LABOUR 2016			
408-1	Operations and suppliers at significant risk for incidents of child labor	<p>All Business Units shall conduct a human rights due diligence including risk mapping in these areas. We practise a zero tolerance in this area and the risk is greater in our operations in Asia, especially manufacturing and work intensive production companies etc.</p> <p>This is also part of risk assessment of the supplier pre contract and annual Self-Assessment Questionnaire (SAQ).</p> <p>All suppliers are legally bound to obey international standards in this area. This is also an important part of the regular inspections executed locally; we check compliance by numerous inspections across Group every year.</p> <p>Incidents in these areas shall be reported immediately and corrective actions are required at once.</p> <p>We also include this in training & awareness sessions/supplier conferences organised locally. See more about underage labour: Telenor Annual Report 2016 –p. 54</p>	Principle 2, 5 SDG 10, 16
GRI 409: FORCED OR COMPULSORY LABOR 2016			
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	<p>http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/</p> <p>See section Sustainable Supply chain in Telenor Annual Report 2016 - p.53</p>	Principle 4 SDG 8, 10
GRI 410: SECURITY PRACTICES 2016			
410-1	Security personnel trained in human rights policies or procedures	<p>Identified omission: Percentage is not disclosed. Reason for omission: Telenor’s ambition is that all security personnel, directly or indirectly employed, shall have performed internal health, safety, security and environmental training, where human rights and OHS issues are part of training. As all Telenor companies shall have management system according to OHSAS 18001, the follow up and training is part of the management system processes.</p>	Principle 1 SDG 16
GRI 411: RIGHTS OF INDIGENOUS PEOPLES 2016			
411-1	Incidents of violations involving rights of indigenous peoples	In 2016 there were no incidents reported.	Principle 1 SDG 2
GRI 412: HUMAN RIGHTS ASSESSMENT 2016			
412-1	Operations that have been subject to human rights reviews or impact assessments	All Telenor Group business units completed their first round of due diligence in 2015. During 2016	Principle 1

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		focus was on what lessons were learned from this exercise, which brought out the importance of continued focus and attention. See Telenor Annual Report 2016 –p. 55. Further we conduct assessments related to e.g. specific projects, entry into new markets.	
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	100% of all suppliers, about 22,200 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 2016 –p. 53.	Principle 2
GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016			
414-1	New suppliers that were screened using social criteria	The Business Units evaluate the SCP Risk for any existing or potential Supplier and/or its Sub Suppliers. 100% of new suppliers were screened using labour practices criteria Telenor Annual Report 2016 –p. 53.	SDG 5, 8, 10, 16
414-2	Negative social impacts in the supply chain and actions taken	Telenor has uncovered findings of underage labour (15-18 years) and child labour (12-14 years) in the network rollout in Myanmar, where the minimum age is 18 years for potentially hazardous work. In 2016, the number of findings was significantly reduced from that in 2015, down to 3 cases of child labour and 13 cases of underage labour, and all of these findings in Myanmar were mitigated. Telenor Annual Report 2016 –p. 54.	SDG 5, 8, 10, 16
GRI 416: CUSTOMER HEALTH AND SAFETY 2016			
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	We have not identified any incidents or non-compliances with H&S regulations and applicable standards in 2016	SDG 16
GRI 417: MARKETING AND LABELING 2016			
417-2	Incidents of non-compliance concerning product and service information and labeling	Telenor is not aware of any incidents or non-compliances concerning product and service information and labelling in 2016	SDG 12, 16
GRI 418: CUSTOMER PRIVACY 2016			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Telenor is not aware of any substantiated complaints regarding breaches of customer privacy and losses of customer data in 2016.	SDG 16

GRI standard	Standard disclosure	Telenor response	UN Global Compact
GRI 419: SOCIOECONOMIC COMPLIANCE 2016			
419-1	Non-compliance with laws and regulations in the social and economic area	<p>We have not identified any significant fines or major non-monetary sanctions for non-compliance with laws and regulations within Telenor Group during 2016.</p> <p>Telenor Annual Report 2016 –p. 37 Regulatory Risk</p>	SDG 16

GRI 103: Management Approach

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

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

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

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

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

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

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

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

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

For commitments targets and actions on our material aspects, please see the relevant section in the [Telenor Annual Report 2016](#)

GRI 103-3 Evaluation of the management approach

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

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

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2016
<p>Human Rights - ensuring that operations or business relationships do not infringe on human rights, -respecting the human right of freedom of expression</p>	<p>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>	<p>Detailed reporting on how we work with Human Rights can be found in our annual report. This information is aligned with the Guiding Principles of the Telecommunications Industry Dialogue on Freedom of Expression and Privacy (ID).</p>	<p>Telenor Annual Report 2016 page 55 Human Rights – Status and Ambition</p>
<p>Ethics and Anti-Corruption - including anti-corruption and bribery, anti-competitive behaviour</p>	<p>Ensuring the right corporate governance platform for ethics, anti-corruption and transparency, undertaking social and environmental responsibility, and respecting human rights and labour rights, is managed through our Code of Conduct and other guiding documents</p>	<p>Alignment with our approach is carefully monitored by our compliance functions.</p>	<p>Telenor Annual Report 2016 page 48 Ethics and Anti-Corruption – Status and Ambition</p>
<p>Privacy and Data Security - avoiding information being overused for commercial or other purposes or stolen</p>	<p>Telenor has a clear privacy position: Open and transparent about how personal data is collected and used, committed to using personal data to provide better and more relevant services, and thorough in keeping personal data safe. The reviews of Telenor’s business units have covered routines and processes for privacy, authority requests and information management.</p>	<p>Alignment with our approach and governing principles is carefully monitored by our privacy- and security functions.</p>	<p>Telenor Annual Report 2016 page 56 Privacy and Data Security – Status and Ambition</p>
<p>Corporate Governance - including policies ensuring board independence, board diversity, remuneration and responsibility and accountability of the board</p>	<p>Telenor Group’s corporate governance principles and practices define a framework of rules and procedures for the way business is governed and controlled in all Telenor business units. Each business unit adopts the relevant governing documents.</p>	<p>Business Unit performance reviews are conducted regularly with each of the main BUs in the Telenor Group, and are chaired by the Group CFO with participation from other relevant functional EVPs. The purpose of these meetings is to monitor and follow-up key strategic priorities, financial and operational performance relative to defined targets.</p>	<p>Telenor Annual Report 2016 page 46 - Governance</p>
<p>Service Reliability - avoiding network failures, ensuring reliability of high standards of the service in all operating areas, especially during times of disasters</p>	<p>Many of Telenor’s business units, especially the ones operating in disaster prone areas have sound backup plans and redundancy options to ensure service reliability under challenging circumstances.</p>	<p>This is an integrated part of line management responsibility.</p>	<p>Telenor Annual Report 2016 page 63 - Service Reliability</p>

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2016
Supply Chain Sustainability <i>- including human rights, occupational health, safety and personnel security, environment, conflict minerals, hazardous materials, etc.</i>	Telenor's approach to supply chain sustainability is to legally oblige the supplier to uphold responsible business practice according to our policies.	Telenor carries out inspections to monitor compliance with the requirements on responsible business conduct.	Telenor Annual Report 2016 page 56 Supply Chain Sustainability – Status and Ambition
Digital Access and Outreach <i>- access to the service in all markets, including rural and remote areas. In emerging markets focus on bridging the digital divide.</i>	This is part of Telenor's business strategy and is managed accordingly throughout the entire Group.	We carefully track and report development of network capacity and coverage. This is reported all the way to top management at regular intervals.	Telenor Annual Report 2016 page 62 Digital Access and Outreach – Status and Ambition
Transparency & stakeholder engagement <i>- includes provision of timely, accessible and accurate disclosure of performance, goals and policies related to sustainability activities.</i>	These topics are managed through a combination of following public reporting requirements as well as being an active participant in several regional and international initiatives (Global Compact, GNI, ID, GRI, GeSI, etc.).	In addition to internal overview and control, our actions, results and reporting is monitored both through independent third-party assurance as well as various interactions with local stakeholders.	Telenor Annual Report 2016 page 47 - Stakeholder engagement
Labour Rights and Standards; <i>-including diversity, attraction and retention of the best people, training and development opportunities, career prospects – as well as occupational health and safety.</i>	Please see top document references above.	Responsibility of tracking policy requirements, goals and targets lies with the line management. Group Sustainability and Group People oversees the process.	Telenor Annual Report 2016 page 51 Labour Rights and Standards – Status and Ambition
Economic contribution to society <i>- includes investments in local communities, including job creation, skills development, charitable contributions, tax and licenses</i>	The topic is an integrated part of our financial governance system.	In addition to following international accounting standards, Telenor has reported direct, country-by-country impact on investment, taxation and employment, since 2014.	Telenor Annual Report 2016 page 68 Economic contribution to society – Status and Ambition
Child Online Safety <i>- including online and mobile safety, entailing education and tools for children, parents and carers to develop resilience against online risks and harm.</i>	Global programmes, industry engagement, expert partnerships and ambitions to provide education and tools are the main avenues of managing Telenor's intent to empower children, parents and carers. The topic is an integrated	In close coordination with Group Sustainability, the different business units initiate projects and report back to Group for evaluation.	Telenor Annual Report 2016 page 60 Child Online Safety – Status and Ambition

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2016
	part of Group Policy Sustainability and is managed through a designated position in Group Sustainability which oversees and coordinates initiatives throughout the Business Units.		
Innovating and Researching for Shared Value <i>-including solutions with social benefits, such as mFinance, mHealth, mAgri, mEducation, mGovernment, mWomen and smart working.</i>	Given the nature of this material aspect, it is difficult to establish a separate governing document; however, it is a key focus in our strategy, firmly placing a responsibility throughout the business units with a coordinating responsibility at Group Sustainability.	Since the topic is still in its infancy and mainly project based, the different results are communicated to Group for continuous evaluation and improvement.	Telenor Annual Report 2016 page 64 Innovating and Researching for Shared Value – Status and Ambition
Mobile Phones and Health <i>- including electromagnetic fields from masts and mobile phones, user complaints concerning issues such as radiation, radio waves and Wi-Fi</i>	Whenever Telenor installs new network equipment, we ensure public health and safety by adhering strictly to the electromagnetic exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines are endorsed by the World Health Organisation (WHO). The responsibility lies with each business unit.	Since all business units must work in accordance with national and international guidelines and these represent the basis for all our planning, installation work and safety measures at antenna sites; this is monitored by the line management	Telenor Annual Report 2016 page 62 Mobile Phones & Health – Status and Ambition
Environment and Climate Change <i>- including EMS and waste management, energy efficiency, energy use and reduction of greenhouse gas emissions– as well as services and technologies that enable society/ customers to reduce their climate impact</i>	Please see Telenor Environment Policy	Environmental Management Systems (EMS) in line with ISO 14001 shall be in place and followed-up in all business units.	Telenor Annual Report 2016 page 58 Environment and Climate Change – Status and Ambition