# **DNV-GL**

# CLAIMS ASSURED BY DNV GL

The following claims in Telenor's Sustainability report 2017 have been reviewed by DNV GL in the assurance process:

## Statement from CEO

- Connecting people, business and societies have been the core of our business for more than 160 years. We're making sure that our customers are connected to what matters most in their everyday lives. To us, it's more than good business. It's empowering societies.
- Sustainability at Telenor is about how we do business.
- We are committed to all UN Sustainable Development Goals but with specific focus on goal #10 Reduced Inequalities.
   We want to help unlock the benefits of the digital revolution and demonstrate how more can be achieved with connectivity. We work to raise standards and delivering wider access to our services.
- Our people and our culture are instrumental in safeguarding the responsible and sustainable business that Telenor is committed to – both internally and in our supply chain.
- We fully support the UN Global Compact Principles, and together with our customers and partners we are well positioned to help deliver on the UN Sustainable Development Goals.

# Sustainability at Telenor

- Telenor exists to connect our customers to what matters most – we empower societies. This is our purpose.
- We seek to personalize this experience based on their needs and preferences.
- At Telenor, we are convinced that more equality in the world is good for our business and for the people we serve.
   We remain committed to raising standards across our operations and to driving for greater access and increased opportunities by empowering societies wherever we are.

- Some of the markets in which Telenor operates are emerging economies with potentially complex and sensitive political and social contexts, and the associated risks related to corruption and human rights especially will continue to fare high on the wider telecommunication industry agenda.
- Responsible Business Conduct is about mitigating Telenor's most critical business environment risks, seizing the opportunity to generate positive longterm value and meeting stakeholder expectations. Strengthening awareness, accountability and transparency are key to securing our license to operate and ensure ethical and responsible business practices.
- Telenor has developed high standards in the areas of anti-corruption, labor rights, human rights and the environment as defined in international conventions and best practices. These standards will be further developed and strengthened.
- This also applies to the standards within supply chain sustainability, anti-trust and Telenor's role in contributing to society, e.g. financial services for financial inclusion or registration of child-births through a mobile device.
- Telenor is contributing directly and indirectly to many of the UN Sustainable Development Goals and acknowledge the role of the private sector in delivering on these goals
- In 2017, Telenor chose to specifically focus its efforts on The United Nation's global Sustainable Development Goal number 10: Reduced Inequalities. Telenor has set out targets through to 2020 to contribute towards this goal by continuing supply chain capacity building, training children in online safety and utilising mobile technology for birth registration. Telenor aims to reduce inequalities 1) by improving access to services through leveraging digital services and connectivity in innovative ways to address social and economic challenges, and 2) by raising standards in employment and supply chain sustainability across the supply chain.
- Cyber security is a global risk affecting the telecommunications industry, but is also a potential differentiator.

 In 2017, implementing a global security programme and establishing global capabilities and common standards were prioritised.

Experts have been recruited in global roles as part of a critical capability programme, and local security officers are in place in all business units. Telenor has a strong commitment to security, and this is at the foundation of everything the company does.

- Personal data is handled with care and customer data is used to create value for the customer
- In 2017, in addition to preparing for implementation of the new EU GDPR regulation, Telenor strengthened competencies and recruited for new internal privacy capabilities.

#### Strategic focus on reducing inequalities

- Responsible business and sustainability is an integral part of Telenor's business strategy. It is about how we do business
- We are committed to all UN Sustainable Development Goals but with specific focus on goal #10 Reduced Inequalities.
- Our purpose is to empower societies.
- The way we run our company is based on clear standards on everything from privacy to anti-corruption, energy efficiency to human rights. We are working to continuously improve everything we do, and working with our suppliers to do the same.
- We want to help unlock the benefits of the digital revolution and demonstrate how more can be achieved with connectivity.
- We have made access to financial services more available and affordable.
- Our internet services have opened possibilities to interact, learn, participate and grow both socially and economically. More women are using these services than ever before.
   Farmers are better informed on how to increase their output.

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- We work to raise standards and delivering wider access to our services.
   This is why we have initiatives in all markets designed to grow children's online resilience. Our efforts to register the births of thousands of invisible children are ongoing in Pakistan and will soon commence in other Asian markets.
   And our supply chain sustainability work as well as human rights due diligence efforts, continue to raise standards internally and downstream.
- We have set targets for this work. To help vulnerable groups in our markets prepare for a digital future we will grow their capacity, skills and resilience. By 2020, we will facilitate access to identity for seven million and educate and build the resilience of four million children on online safety.
  - Furthermore, we will raise standards for our employees and our supply chain. We will build the capacity of our suppliers to raise standards in their operations through 100,000 hours of training.
- Partnerships between governments, businesses, and organizations are central to stimulate growth and create shared value, both for the business and society. At Telenor, we work in partnership with local authorities and local organizations and through a global partnership with UNICEF. The skills, networks and resources of our partners are essential to achieve the outcomes we seek.

## About this report

- These material issues in the report have been articulated through a materiality assessment based on the Global Reporting Sustainability Standards' principles and embody issues which are deemed to be most important to both Telenor and its stakeholders. Details on Telenor's materiality assessment can be viewed at www.telenor.com/sustainability/reporting/scope-and-principles.
- DNV GL has been commissioned to carry out an independent review of the Sustainability Report, in particular to assess the accuracy of claims. DNV GL's independent review can be found at the end of this report.

This sustainability report for 2017 does not – in general – include performance data from our Indian operations, since Telenor India has been treated as an asset held for sale and discontinued operations in Telenor's financial reporting for 2017. Exceptions to this will be significant incidents in India that will be reported as part of our principles of transparency.

#### **Corporate Governance**

- 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.
- The governance framework is used as a platform to integrate material sustainability issues into its business strategies, daily operations and relationship with stakeholders.
- Telenor's corporate values and ethical standards represent an important foundation for articulating and implementing the governance framework.
- Telenor works continuously to improve its governance regime. In 2017 Telenor has taken steps to simplify its governing documents. All Group policies have been modified to ensure that they are risk based and consist of clear and adequate requirements that are measurable and can be monitored.
- Telenor's commitment to integrity and transparency is clearly stated in Telenor's Code of Conduct – which is owned and approved by the Board, and must be signed by all employees.

- The Sustainability and Compliance Committee (the "Committee" or "SCC") is a preparatory committee of the Board of Directors of Telenor ASA (the "Board") that supports the Board in fulfilling the Board's responsibilities with respect to addressing sustainability and the scope of compliance for the Committee. In its work, the Committee is guided by international conventions and recommendations, the Telenor Code of Conduct, policies and manuals relevant to the scope of the SCC. The Committee also supports the Board in fulfilling its responsibilities to specifically address climate & environment, human rights, labour standards, and anti-corruption.
- More information on Telenor's principles and practices for corporate governance can be read in Telenor's Report on Corporate Governance in the Annual Report of 2017 and at www.telenor.com/aboutus/corporate-governance.

# Reporting and Stakeholder Engagement

- Telenor believes good corporate governance involves openness, trustful disclosure and engagement between all internal and external stakeholders.
- Telenor's commitment to integrity and transparency is clearly stated in Telenor's Code of Conduct. The Code of Conduct is owned and approved by the Board, and must be signed by all employees.
- The principles of transparency at Telenor are part of the corporate governance framework and implemented within company operations. Transparency and openness around sustainability related dilemmas and challenges will help the company drive continuous improvement based on an active dialogue with stakeholders.
- Expectations with regard to sustainability reporting from major stakeholders continue to increase.
- Telenor firmly believes that reporting will contribute to open discussions and in building knowledge on challenging issues.

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- In order to ensure structured, transparent and relevant reporting of sustainability performance, Telenor Group reports to various external organisations including UN Global Compact, the international reporting standard GRI and CDP regarding climate change disclosure.
- Telenor uses the GRI Sustainability
  Reporting Standards based materiality
  assessment process to involve a range
  of external and internal stakeholders
  to help identify social, economic and
  environmental topics that matter most
  both to them and Telenor's business.
  The scope of the current materiality
  assessment and engagement process
  can be found here:
  www.telenor.com/sustainability/repor
  ting/scope-and-principles.
- In 2017, both Telenor Group and many of Telenor's business units reported locally on their sustainability performance, which can be found on www.telenor.com/sustainability/repor ting.
- Telenor has continued its focus on human rights transparency and reporting, such as issuing an updated Authority Request access report and reporting on alignment with the guiding principles from Telecommunications Industry Dialogue on Freedom of Expression and Privacy (ID).
- The new reports for 2017 are available here https://www.telenor.com/sustainabilit y/responsible-business/privacy-anddata-protection/handling-accessrequests-from-authorities/
- For the fourth year in a row, the global climate reporting organisation CDP (formerly Carbon Disclosure Project) rated Telenor Group in their 'Leadership' category as part of its climate ranking list for 2017. Telenor is still the best telecom company with headquarters in Scandinavia.
- As part of Telenor's strategic focus on responsible business conduct, the company aims to develop its stakeholder relations as a long-term owner and business partner, true to its commitments, values and the purpose of empowering societies.
- The company will purposefully apply business standards that may be higher than what is decreed by law in its respective markets.

- In February 2017, Telenor in Myanmar held its 4th annual sustainability briefing since 2014. At this session; the Telenor Myanmar CEO Lars Erik Tellmann expressed the company's commitment to be open and transparent on its business, challenges, and how they face key sustainability issues such as responsible business conduct in the supply chain, energy innovation in a challenging market, ethics and compliance, cybercrime and legal frameworks as well as how to empower women in the workplace.
- In September 2017, Telenor Group's General Counsel and Chief Corporate Affairs Officer Wenche Agerup was invited to UN General Assembly in New York to discuss how the business sector can commit to the Sustainable Development Goals (SDGs) and to present why Telenor has chosen to focus on reducing inequalities in society.
- The Rohingya situation in Myanmar was high on the international agenda in 2017. Telenor viewed the developments in the Rakhine State in Myanmar with grave concern, and published a statement to that effect in September 2017 which was communicated to the Myanmar authorities. See more information in chapter on Human Rights.
- The company follows developments closely and continues to focus on ensuring provision of services to all people in Myanmar. We will continue to seek to engage constructively and encourage all parties to follow up on the recommendations in the Annan report.
- In October 2017, Telenor Group
  President and CEO Sigve Brekke was
  invited to hold the Rafto Challenge
  lecture at NHH Norwegian School of
  Economics in Bergen, presenting how
  Telenor Group works with human
  rights, how Telenor addresses
  challenges and how the company
  needs to stay vigilant and continuously
  improve.

- In November 2017, top management in Telenor Group and the business units in Thailand, Bangladesh and Malaysia invited to local forums from private sector, government and NGOs to discuss how to collaborate on the UN Sustainable Development Goals and with a specific focus on challenges and opportunities for partnering to reducing inequalities in society. These local top management forums will continue in other Telenor markets in 2018.
- In December 2017, Telenor gathered 24 exceptional young talents from 8,000 applicants in 13 countries to the Telenor Youth Forum in Oslo. The participants worked in teams to solve specific social challenges by designing digital solutions that can reduce inequalities in society.
- In 2018, Telenor will continue its stakeholder engagement within the sustainability area:
- Arrange meetings and broader communications activities to engage with investors and relevant stakeholders in the company's current sustainability challenges and opportunities.
- Demonstrate how Telenor can empower societies through its business and how we contribute to the UN Sustainable Development Goal of Reduced Inequalities.

## **Ethics & Anti-corruption**

- Telenor has zero tolerance on corruption and Telenor's ethical standards promote proper business practices and reflect relevant laws, regulations and internationally recognized standards. These standards are set out in our Code of Conduct (approved by the Board), Group Policy Anti-Corruption (approved by the President and CEO), Third Party Risk Policy (new) and other governing documents, that are implemented in all Telenor's subsidiaries directly or indirectly controlled by Telenor ASA.
- The Anti-Corruption Programme is part of Telenor's Governance model which clearly defines roles and responsibility for implementation of the Anti-Corruption Policy, both at Group and local business unit level.

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- The Sustainability and Compliance Committee of the Board supports the Board in fulfilling its responsibilities with respect to ensure that Telenor builds and maintains an effective ethics and compliance program, maximizes the inherent benefits of such a program, and consistently promotes a culture that demands ethical business conduct and compliance with the Code of conduct, our policies and procedures and responsible business practices.
- The Group Chief Compliance Officer heads the group-wide Compliance function and supports the President and CEO and the Board in ensuring that the Code of Conduct sets the appropriate standards, and that these standards are implemented and enforced. Starting in 2018, the Chief Compliance Officer is also responsible for the Anti-Corruption Program and the Third-Party Risk Policy.
- The Group Chief Compliance Officer reports functionally and administratively to the Group CEO & President and meets regularly in (along with functional reporting to) the Sustainability & Compliance Committee of the Board. With effect from January 1, 2018 the Local Head of Compliance in Telenor Business Units will report to the Group Chief Compliance Officer and local Board/Board Committee, as well as administratively to the local CEO.
- In accordance with a decision by the Telenor ASA Board of Directors in February 2017, Integrity Hotline management, fact finding and investigation of compliance cases have been moved from Group Compliance to Group Internal Audit & Investigation. Investigated cases are reported to the Risk and Audit Committee by the Head of Group Internal Audit and Investigation.
- A description of Telenor's Anti-Corruption Programme and the Ethics and Compliance function is publicly available on the web sites: .www.telenor.com/aboutus/corporate-governance/ethicscompliance and www.telenor.com/aboutus/corporate-governance/anticorruption.

- Telenor Group's Anti-Corruption
   Programme has been effective for
   years. Regular reviews, alignment with
   prevailing international guidelines and
   implementation of learnings are
   essential for maintaining an effective
   Anti- Corruption Programme. The
   programme is assessed and revised on
   a regular basis as part of the annual
   Group Governance Work Programme.
- The Code of Conduct must be signed by all employees upon joining the company. The Code of Conduct is signed annually along with mandatory e-learning.
- In Telenor, each employee has a personal responsibility to act with integrity and speak up if they become aware of potential breaches. Leaders have a particular responsibility to act as good role models and to build a safe, trustful and transparent culture in their teams.
- Managing breaches of the Code of Conduct and Governing Documents is an important pillar of Telenor's ethics and compliance work. Employee confidence in reporting incidents is central to ensuring an ethical corporate culture.
- To encourage individuals such as employees, suppliers and other stakeholders to voice their concerns, Telenor have established a global external reporting hotline and website (Integrity Hotline).
- Group Internal Audit & Investigation is conducting the investigations and fact finding of the reported concerns.
- The new organization model will increase the independence in the handling of cases.
- The Integrity Hotline is a confidential channel where anyone can ask questions and raise concerns about possible breaches of Telenor's Code of Conduct, including relevant laws, regulations and governing documents.
- The report intake of the Integrity
  Hotline is operated by an external
  service provider, NAVEX Global, while
  investigations and case handling are
  handled by Group Investigations. The
  Integrity Hotline is also made available
  for external parties. Reports that are
  brought to Group Investigations via email or personal contact are logged in
  the system.

- The Integrity Hotline and case management system have enabled stronger global oversight for Telenor. Around 58 per cent of all incoming reports in 2017 came in through the Integrity Hotline.
- The reporting mechanism as well as a strengthened focus on communication and training has contributed to an increase in the total number of concerns the recent two years.
- It is generally viewed as a sign of openness and trust that employees and other stakeholders speak up about their concerns. This allows the organisation to address the issues, investigate and take disciplinary action when needed and especially to learn and aim to prevent issues from recurring.
- The reporting volume per 100 employees in 2017 ended up at 2.8 which is an increase from 2.4 in 2016.
- The NAVEX Global 2017 Ethics & Compliance Hotline & Incident Management Benchmark Report (comparing annual analysis of all industries/customer data of NAVEX) has a stable median level of global value over the past five years.
- Comparing with companies which also capture reports from all reporting channels (web, hotline, open door, emails), the comparable median shows that Telenor is on par with the industry.
- Increased use of incident management tool and reduction in number of employees are reflected in this year's numbers.
- Of all the incoming reports, about 30 per cent were submitted anonymously.
- As a comparison, the NAVEX Global 2017 Hotline Benchmark report shows that median level has been stable at around 60 per cent anonymous reports since 2008.
- In 2017, Group Investigations logged 911 incoming reports, a small increase from 2016.
- Around 57 per cent were compliance incidents that were being handled by the Group Investigations organisation, along with 9 per cent of the questions

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- About 38 per cent of the incoming reports were concerns pertaining to other parts of the organisation, such as line management or HR
- All incoming reports shall receive an answer from Group Investigations either through the confidential and anonymous communication channel or via preferred means of communication.
- The compliance incidents were mainly in Business Integrity, Theft & Embezzlement and Working Environment.
- About 60 per cent of the 57 compliance incidents were substantiated.
- Of the substantiated incidents, around 67 per cent resulted in termination of employment or other disciplinary sanction.
- In comparison, the NAVEX Global 2017 Hotline Benchmark report shows substantiation rates of around 40 per cent the recent years.
- The reason for Telenor's higher score may reflect that we get high quality reports, but it probably also indicates that the scope of cases for many customers in the benchmarking study is wider, including many HR cases which generally are more difficult to substantiate.
- As part of the transfer of responsibility for fact finding and investigation from Group Compliance to the new unit Group Internal Audit and Investigation (GIA&I), Telenor is in the process of upgrading systems and processes to ensure a robust handling of compliance cases.
- Compliance will, when fact-finding and investigation is concluded, handle the case as part of the updated resolution procedure which includes both disciplinary and corrective actions.
- Integrity is a vital part of Telenor's business. Telenor's management is committed to sending clear, unambiguous and regular messages to all staff and business partners that corruption and bribery are unacceptable.

- Telenor's governing documents set one single standard which shall govern all business activities, regardless of where such activities take place.
- Nevertheless, some markets in which Telenor operates are emerging economies with potentially complex and sensitive political and social contexts, including markets associated with high corruption risks.
- This creates challenges that require robust, targeted measures to mitigate such risks.
- All Telenor business units have a responsibility to conduct regular risk assessments and risk-based reviews of their anti-corruption procedures and implement remediating measures to mitigate risks. Telenor is focused on continuous improvement of risk management processes.

## **Labour rights & standards**

- Maintaining a working environment and a culture that nurtures occupational health, safety and personnel security (OHS&S) is important at Telenor.
- The OHS&S approach covers employees as well as in-house contractors, vendors and suppliers.
- Telenor believes that OHS&S of employees is vital to its business and makes a difference in employee engagement.
- Telenor is committed to continuously learn from experience and improve its efforts within OHS&S and are currently reviewing procedures, policies and actions within this area.
- Telenor is committed to respecting labour rights principles as laid down in UN Global Compact and ILO's fundamental conventions.
- These principles relate to respecting the rights to freedom of association and collective bargaining, the elimination of forced labour, child labour and discrimination in the work place, and are reflected in Telenor's Code of Conduct, Group People Policy and Supplier Conduct Principles.

- Telenor believes in empowering employees through management dialogue with employees or their recognised employee representatives.
- and by utilising the employees' experience and insight to influence working conditions and contribute to sustainable business growth.
- Telenor Group is, throughout its operations, promoting partnerships based on good and trusting dialogue, e.g. in relation to acknowledged unions or through local cooperation bodies such as People Council.
- All workforce restructuring in Telenor shall be done with the aim to create and sustain long term business value. Workforce restructuring shall be done in a responsible manner, through verifiable processes and in accordance with the Telenor Way and applicable legal requirements and legislation.
- At Telenor, attracting and retaining the best talent through training and development opportunities as well as career prospects is fundamental to continued competitiveness and growth.
- Telenor also strives for diversity, inclusion and equal employment opportunities in accordance with the People Policy.
- In 2017, the Sickness Absence Rate
  (SAR) for the entire Telenor Group was
  1.84 per cent. This number is reported
  with the acknowledgement of
  variations in reported data based on
  different local national procedures and
  regulations related to sickness
  reporting.
- In 2017, close to 18,000 employees and in-house contractors attended Health Safety Security & Environment related awareness training sessions.
- There were no work-related employee or in-house contractor fatalities reported in Telenor Group for 2017.
- It is with great regret that during the year 2017, we have experienced seven fatalities in our supply chain in Pakistan, Bangladesh and India.
- We provide context for those deaths in the section of Supply Chain Sustainability.

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- In 2017 Telenor Works Council –
  Europe (TWC-E) held six meetings, of
  which 4 meetings where European
  employee representatives met with
  the Telenor Group Management. The
  objective was to enhance information
  exchange and discussions in relation to
  transnational issues impacting
  employees, with a particular focus on
  the ongoing transformational changes
  in Telenor Group.
- Additionally, Telenor has continued its commitment to promoting employee involvement in operations throughout the Group.
- Almost all of Telenor's operations in Europe and Asia are providing for employee involvement through dialogue between management and recognised employee representatives, e.g. in relation to acknowledged unions or through People Council as a local cooperation body.
- In Bangladesh, Telenor and UNI Global Union have continued the dialogue on fundamental labour rights, focusing in particular on the unionization issue in its operations in the country.
- There is an ongoing court case filed by employees of Grameenphone related to union registration.
- In 2016 the Labour Appellate tribunal announced a verbal verdict allowing for union formation in Grameenphone.
- The involved parties have been awaiting the written verdict for further guidance on the establishment of a union in the company. In January 2018 the written verdict was announced by the court, directing the case to the Director General of Labour.
- Also in Bangladesh, the industry review of the labour rules has shown progress during 2017. The
   Government appointed a tripartite consultative committee to propose a revised regulatory framework and in August the Government submitted a 1st draft on legal amendments to ILO for their review. A final proposal is expected in 2018 and Telenor is hoping that this will result in needed legal clarifications of the labour rules application to the private service sector.

- Telenor view positively initiatives from its employees of establishing a union in Grameenphone according to applicable local laws and regulations.
- Telenor aims to foster a diverse and dynamic workforce at all levels, in terms of gender, age, nationality and competence.
- Gender balance and diversity initiatives in 2017 included operationalising WIN (Women Inspirational Network) as a leadership development platform for more than 200 mid-level managers in all business units.
- Telenor has six-month paid maternity leave policy for women employees as a minimum standard,
- 50/50 women and men in the interview process (when possible)
- and structured review of leadership appointments through the People Committee.
- In 2017, Telenor continued to build its stance on gender balance and diversity through its commitment to UN sustainable goal #10. While there are still gains to be made, recent efforts have yielded positive results.
- At year-end 2017, Telenor's Group Executive Management included 42 per cent women leaders, and senior leadership level improved from 23 per cent to 26 per cent women leaders.
- The nationality split amongst senior leaders at year end 2016, included, approximately 68 per cent Scandinavians, 13 per cent from rest of Europe, 16 per cent Asians, and 3 per cent others.
- During 2017, disability inclusion remained high on Telenor's agenda with five business units running the Open Mind Programme, which provides training opportunities to persons with disabilities in the workplace. Integration of skilled personnel with migrant backgrounds also continued in Norway.
- At year-end 2017, Telenor Group employed close to 31,000 people (excluding India) of which 36 per cent are women.

- Whilst undergoing business transformation Telenor Group will continue promoting employee involvement throughout Telenor Group and maintenance of good labour standards in the company's operations.
- As Telenor Group operates in markets with differences in risk, regulation and also differences related to the local infrastructure, that to a high degree steers the OHS&S risks, we will focus on continue identification and mitigation of the local risks, combined with increasing the group collaboration and secure local management attention and follow up.
- Telenor will continue to invest in programmes and initiatives to promote greater diversity at all levels – gender, age, nationality and competence - in the workplace, and in the societies where the company operates. Moreover, Telenor will continue its work to integrate people with disabilities through the company's Open Mind Programme.

#### Supply chain sustainability

- Telenor strives for high standards on sustainability and continuous improvement in its operations throughout the supply chain.

  Telenor's Supplier Conduct Principles (SCP) are based on internationally recognised standards, including requirements on human rights, health and safety, labour rights, environment and anti-corruption. It is mandatory for all Telenor contracting parties to agree to these principles.
- Telenor's approach to supply chain sustainability is to legally oblige the supplier to uphold responsible business practice, monitor compliance to Telenor's requirements and to do capacity building among suppliers. All suppliers are obliged to extend the supplier requirements further down in their own supply chain.
- Partnership and cooperation with suppliers is vital to achieving a responsible supply chain. Telenor is an active member of the Joint Audit Cooperation (JAC), Global e-Sustainability Initiative (GeSI).

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- The supply chain responsibility focus in 2017 remained on mitigation of supply chain risk, capacity building and monitoring compliance to Telenor's requirements on responsible business conduct.
- Our key risks are within working conditions in our Asian operations such as health and safety (especially road accidents), labour standards including underage/child labour.
- We follow-up that preventive anticorruption programs are in place also with our suppliers.
- There are also SCS risks in the telecom downstream value chain and newer businesses such as telecom distribution and sales, digital suppliers as well as new digital businesses.
- Our most fundamental responsibility as an employer is to keep all people who work for us safe from harm – and we do not differentiate between our own employees, in-house contractors or our suppliers' employees.
- It is with great regret that during the year 2017, we have experienced seven fatalities in our supply chain:
  - In Pakistan, a supplier's employee died in a motorbike accident. At the time of incident he was not wearing his safety helmet.
  - In Pakistan, a supplier's employee was shot and killed in a robbery at retail outlet while doing a market visit.
  - In Pakistan, a second line supplier's employee died in a road accident while three other employees were injured and sent to hospital.
  - In Pakistan, a supplier's employee in Pakistan died when their car collided with a mini truck. Three other employees were injured and sent to hospital.
  - In Pakistan, a second line supplier's employee fell down from a mobile tower and died.
  - In Bangladesh, a supplier's employee was killed in a road accident.
  - In India, a supplier's employee was killed in a road accident while driving a motorbike.

- In all incidents, our required reporting procedures were followed and each and one of the incidents were handled immediately and individually with mitigating actions.
- Risk re-assessment and plans for preventing similar incidents have been carried out. Employees' families have been followed-up and been given compensation.
- All suppliers and parties having a direct contractual relationship with Telenor must comply with Telenor's Supplier Conduct Principles (SCP). An Agreement on Responsible Business Conduct (ABC) legally obliges the supplier to comply with the SCP and certain requirements set out in the ABCs. As at year-end 2017, we have signed approximately 9000 ABCs with almost all our active suppliers that we have defined as in-scope for ABC (based on risk assessments).
- If a supplier has objections to signing our ABC, the risk involving softer requirements shall be considered and procedures for adjustments of text, clause on Responsible Business
   Conduct in the underlying contract, waivers and waived category list shall be followed. A small number of waivers for signing the ABC are given based on a supplier's refusal to sign, and with the local CEO's approval for local contracts or with Group
   Sustainability for global contracts.
- Telenor is using EcoVadis as a risk rating system for global suppliers to increase monitoring of the supplier's sustainability performance.
- The EcoVadis platform is an external tool that measures a company's performance based on a wide range of sustainability criteria and is a wellrecognised tool used by a high number of buyers across many industries, including the telecom industry.
- The purpose of using EcoVadis is to measure sustainability performance based on verified external information, reduce risk and integrate sustainability into the sourcing processes.

- Telenor carries out local inspections in all our markets in order to monitor compliance with the requirements on responsible business conduct. In 2017, Telenor carried out approximately 5,000 supplier inspections (ranging from simple site visits to more comprehensive inspections or audits) across the Group. 84 per cent of the inspections were carried out unannounced. More than 560 major non-conformities were identified during the inspections across the business units and are followed up with mitigation plans and processes with aim to close these non-conformities.
- In 2017, Telenor has transferred to a new reporting tool platform. We have started using DNV GL's Synergi Life as a common reporting tool for all local supplier inspections with a focus on environment, health and safety. The Synergi Life tool enables all our business units to manage nonconformances, incidents, risk, risk analyses, audits, assessments and improvement suggestions.
- Through participation in the Joint Audit Cooperation (JAC) together with other telecommunications operators (13 members in 2017), Telenor gained access to the results of 89 sustainability audits of global suppliers in 2017.
- A standard JAC audit focuses mainly on preventive anti-corruption program, labour rights, and working conditions, as well as health, safety and the environment.
- Telenor executed six of these audits of global suppliers on behalf of JAC in 2017.
- After carrying out an audit, a Corrective Action Plan (CAP) listing all findings is agreed upon between the auditee and the auditor.
- Over time, JAC has carried out 366 audits in 27 countries, covering more than 817,000 workers. Going forward the number of yearly audits carried out by JAC will increase and the focus will mainly be on tier 2 and tier 3 suppliers.
- During 2017, Telenor has recorded two incidents in Pakistan and one incident in Bangladesh of underage labour (15-18 years) doing hazardous work.

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- Further, one incident in Bangladesh and one incident in Pakistan of child labour (12-14 years) was identified.
- In 2017, the number of child labour/underage labour findings was significantly reduced from previous years – where number of incidents of underage labour in 2015 included 34 persons and number of incidents of child labour in 2015 included 13 children. Similar number of incidents of underage labour in 2016 included 16 persons and number of incidents of child labour in 2016 included 4 children.
- The business units organised more than 23,000 man-hours of various capacity building initiatives in 2017. The capacity building involved various efforts to proactively build local capacity of the suppliers and sub suppliers in order to drive continuous improvement in the supply chain. The activities vary from supplier to supplier depending on the overall risk picture of the business unit. Typical activities include on-site briefings, awareness sessions, workshops, forums, process support, online portals and resource guides, etc. The capacity building is adapted to the practical situation and according to the real need of the supplier, focusing on awareness of Telenor Supplier Conduct Principles issues as well as specific activities related to skill development (e.g. tower climbing). Typical topics will be: Labour rights, health and safety, anti-corruption, sustainability requirements as well as green telecom, women empowerment and diversity. Some business units have also worked in industry and cross industry collaborations to synergise efforts in capacity building.
- In Asia, road-related accidents are among the leading causes of on-thejob injuries and deaths, and 5 of 7 of all fatalities in Telenor's supply chain are road accidents; and all in Asia.
- Telenor Group's footprint in Asia covers more than sixteen thousand employees and approximately six hundred thousand supply chain employees.

- With such large numbers of people working for and with Telenor, and with an extensive network spreading over huge areas of land, the company holds major stakes in everyone's safety.
- As Telenor's markets grow rapidly, traffic and road related safety is an increasing concern. Telenor launched a road safety initiative in 2016 aimed at increasing awareness of road safety and reducing road accidents. This awareness work has continued in 2017.
- Telenor's focus on the long-term risks related to supply chain will stay high on the responsible business agenda with continued work in 2018 on mitigation through local inspections, JAC audits and capacity building. Further, Telenor will secure thorough risk assessment of the supply chain in all business units and also improve efforts in capacity building.

## **Human Rights**

- Telenor's business is about enabling people to communicate, and the company's operations and services touch on core human rights. We see that we can positively impact rights, e.g. through digital birth registration (see Innovating and Researching for Shared Value), but also recognise that our impact may be negative e.g. through potential misuse of our services (see Child Online Safety). Telenor is also present in markets with significant human rights challenges. Understanding the complexity of the potential impacts of our business, mitigating negative impacts and continuously improving are key focus areas.
- Human rights are governed internally as described in chapter "Corporate Governance", and reporting of grievances through the Integrity Hotline to compliance is described in chapter "Ethics and Anti- Corruption". Finally, Telenor's approach to enterprise risk management is described in Sustainability and Compliance in the BoD report.
- To help us navigate and identify the areas of potentially greatest impact, we conduct human rights due diligence both at Group and Business Unit (BU) levels.

- Human rights are also included in our materiality matrix.
- Our activities are drawing on the UN Guiding Principles on Business and Human Rights and other international guidance. We also find it helpful to look at human rights reflecting the four key roles we have as a company employer, provider of telecom and digital solutions, purchaser of goods and services, and as investor. This makes for example labour rights, privacy and freedom of expression (see below and Privacy chapter) supply chain sustainability and due diligence pre-investment important to us.
- Telenor has a three-pronged approach to human rights:
  - 1. Addressing actual and potential risks and impacts of our business through i. Policies & processes the principle of 'respect' is anchored in our Code of Conduct (CoC) and Supplier Conduct Principles (SCP), and due diligence is a policy requirement
  - ii. Guidance dedicated tools drawing on the UN Guiding Principles iii. Training & awareness –specialists training, as well as management &
  - 2. Collaborating with others, for example through

board discussions

- i. Stakeholder dialogue with peers, civil society, investors, academia, government.
- ii. Industry/multi-stakeholder initiatives – member of e.g. Global Network Initiative (GNI) and Joint Audit Cooperation (JAC) (see SCS chapter)
- 3. Being transparent on challenges and company practices to the extent possible in
- i. Annual reporting this report
  ii. Issue specific reporting Including
  our so-called 'transparency report' on
  number of authority requests in our
  markets as well as a bi-annual 'legal
  overview' of key laws related to
  authority requests in our markets
  iii. Sustainability
  updates/presentations e.g. annual
  updates by Telenor Myanmar to
  stakeholders on key human rights
  issues

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- The situation in the Rakhine State in Myanmar was and continues to be high on the international agenda. Telenor viewed the developments in Rakhine with grave concern, and published a statement to that effect in September 2017 which was communicated to the Myanmar authorities.
- The company follows the developments closely and continues to focus on ensuring provision of services to all people in Myanmar. We will continue to engage constructively and encourage all parties to follow up on the recommendations in the Annan report.
- In order to stay informed and follow developments in human rights in our markets we worked during 2017 to update our Group level human rights due diligence.
- With assistance from BSR we revisited our understanding of country risks, as well as explored international trends and good practices for mitigation.
- This work also fed into an update of BU level due diligence, starting with a pilot in four BUs in Q4 2017. As part of this pilot our tools to conduct due diligence are being revised recognising that our current tools are complex and taking in recent international developments and guidance since first developed in 2013-14. This is combined with refresher training on human rights for BUs. Both the Group and BU level processes are ongoing.
- Privacy and freedom of expression continued to be high on the agenda both internationally and within Telenor throughout 2017.
- For more in-depth information on our internal efforts please see Privacy chapter.
- We also ran training sessions on human rights for personnel working on authority requests, e.g. in Telenor Norway.
- March 2017 Telenor Group and six other members of the Telecommunications Industry Dialogue (Millicom, Nokia, Orange, Telefonica, Telia Company, Vodafone) joined forces with the Global Network Initiative (GNI).

- As members of the GNI we work together with internet companies like Google, Facebook, Oath, Microsoft and civil society, academic and investor members to address challenges to privacy and freedom of expression, in particular with respect to authority requests. (Check language in press release, annual report etc.). Telenor Group is a Board member of the GNI.
- Telenor continued its collaboration with industry peers in the Joint Audit Cooperation (JAC), an industry initiative on Supply Chain Sustainability where members conduct audits on major suppliers they have on common and share the findings amongst them, thus increasing efficiency and leverage in terms of rectifying human rights risks at suppliers. [link and check SCS chapter]
- Telenor continued our annual reporting on Authority Requests in our access report for 2016 www.telenor.com/sustainability/respo nsible-business/privacy-and-dataprotection/handling-access-requestsfrom-authorities, as well as our annual report on the alignment with the **Industry Dialogue Guiding Principles** [link]. The reports for 2017 will be published in spring 2018. We also provided an update of our legal overview of the laws relevant to authority requests in our markets [link].
- Telenor also continued to develop its transparency efforts related to its operations in Myanmar with a local seminar in February 2017.
- In October 2017 Telenor Group
   President and CEO Sigve Brekke was invited to hold the Rafto Challenge lecture at NHH, presenting how Telenor Group works with human rights, how we address challenges and how we need to stay vigilant and continuously improve.
- The ongoing update of the Group and BU human rights due diligence will continue in 2018, this includes training of key personnel. The outcomes of this process will inform our priorities for the rest of the year. Telenor will also prioritise the multi-stakeholder efforts of the GNI.

#### **Privacy**

- As a provider of mobile and internet connectivity, respect for the rights to privacy and freedom of expression is central to Telenor's core business.
- The company approaches these issues from a privacy point of view as well as a security angle, with policies and manuals that set out mandatory requirements applying across all operations.
- As Internet of Things (IoT) is getting more important; as well as privacy and security challenges are growing, connected units are no longer isolated from public access and Telenor must make it easy for end-users to safely connect additional sensors or units to their current solutions. Telenor will continue to adapt to these challenges and provide secure solutions related to IoT.
- Since 2015, Telenor has had a clear privacy position: Being 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.
- Since 2015, Telenor has been committed to the GSMA Mobile Connect Privacy Principles. The principles establish a privacy baseline that applies to all parties that provide Mobile Connect-branded identity services.
- Telenor recognises that while telecommunications generally contribute to freedom of expression, there may be challenges related to the business.
- In many situations, authorities may have a legitimate need to require telecommunications companies to comply with requests that limit privacy or free communication.
- For Telenor, it is important to seek to limit risks of illegitimate restrictions on privacy and freedom of expression to the extent that we can.
- We therefore have strict policies that govern Telenor's approach in responding to such requests.
- Telenor continues to prioritise transparency and introduces safeguards against potential abuse.

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- As described in the Human Rights chapter, Telenor actively engages in the Telecommunications Industry Dialogue on freedom of expression and privacy, as well as bilaterally with a range of stakeholders.
- Even though national requirements vary throughout Telenor's markets, the Telenor strives to be transparent about how personal data is handled. Telenor believes this is the best approach to ensure and build the trust of customers and employees.
- An internal project to strengthen Telenor's position on privacy was concluded in 2015, which addressed both how the company handles existing customer data and how products are designed going forward. Telenor has decided to take a customer value-driven approach to privacy. Customers shall get as much value as possible when they share their data with Telenor. Therefore, whenever the company processes data on behalf of customers, Telenor strives to add value to the current experience and deliver more personalised and relevant services.
- The commercial strategy of Telenor identifies the trust of our customers as one of the critical strategic enablers.
- Telenor at the same time believes that going forward our dedication to privacy can develop into a differentiator in relevant markets.
- The aforementioned commercial strategy addresses the growing concern among customers regarding privacy by early consideration of privacy in Telenor's business processes and strategic activities. The current key objective of this exercise is to ensure a strong level of protection of Telenor customers' data and in Europe to ensure compliance with the European General Data Protection Regulation (GDPR).

- In 2017, Telenor has further strengthened its privacy function – both with competence and capacity.
  - All privacy resources have undergone extensive training and the central privacy team in Telenor has been strengthened with an increase in headcounts. Training has focused on general privacy upskilling and on implementing improved processes handling data breaches and requests from authorities. In addition, Telenor has produced new internal guidelines and tools to assist privacy and commercial professionals in their daily work relating to privacy matters.
- The Telenor Group Privacy Policy was simplified in 2017, and the Group Privacy Manual will be revised in Q1 2018 with the objective of strengthening the privacy organisation.
- Also, the Authority Requests manual was in 2017 updated to reflect and address new challenges.
- In addition, the new Data Breach Manual was implemented to strengthen the preparedness and handling of possible data breaches.
- Governments and regulators across
  Telenor's markets are taking new steps
  to strengthen privacy and national
  security regulation and to introduce
  new measures that directly or
  indirectly affect Telenor's ability to
  manage customer data. This trend is
  expected to continue and Telenor will
  also step up its focused work on
  privacy, freedom of expression and
  security to meet both regulatory
  requirements and the expectations of
  customers.
- In order to meet privacy and security challenges, the following areas will be prioritised in 2018: Compliance with changes in European General Data Protection Regulation (GDPR), Strengthened responsiveness to data breaches, implementation of Privacy by Design and Default, Security operations, vulnerability management, security architecture, security culture, security intelligence and physical security.

## **Cyber Security**

- The growing digitalisation of society is making us all more vulnerable both to extreme weather, human and technical errors as well as hostile acts that manipulate or paralyse networks and services. Increased use of telecommunications services and everincreasing complexity of systems and infrastructure, leads to more new cybersecurity risks. Criminals are getting more advanced by the day.
- As a network operator and provider of digital services, Telenor gives cyber security has a high priority.
- telecommunications services depends on the stability of our network and the networks of other service providers with which we interconnect. These networks are vulnerable to damage or service interruptions, including interruptions caused by cybersecurity attacks. Repeated, prolonged or complex network or IT system failures could damage our services and consequently the trust our customers place in us as a reliable communications provider.
- We depend on suppliers and thirdparty providers for supply and maintenance of equipment and services. Problems that manifest themselves in relation to the supply chain may adversely affect our business and operations.
- This includes placing high security requirements towards suppliers, who must ensure adequate levels of privacy and security to stay in business.
   Telenor conducts a high degree of network monitoring and carries out regular and irregular inspections of the work performed by third parties.
- Telenor is committed to providing secure, well-functioning networks and services, and has a strong interest in doing so. Our customers and society in general must have confidence in Telenor as a trustworthy supplier of safe, reliable and secure telecommunications and digital services.

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- Telenor is taking a number of steps to protect customer data and critical infrastructure. We are investing in security competence across our own organization, and we are working with partners and vendors to raise the awareness and set clear expectations with regards to security.
- To meet the fast-evolving threats in the cyber domain, Telenor has developed a holistic, Group-wide and long-term security strategy aiming at securing Telenor's global business. This strategy supports the rapid development in technology and services by early involvement of security and privacy in business processes and strategic initiatives. Furthermore, our ambition is to have security at the core of everything we do, in order to protect people in their digital life.
- During 2017 the global security organisation in Telenor was strengthened with a substantial number of new security experts.
- Particular focus has been given to strengthening operational security, through improved monitoring and establishing of critical operational capabilities globally, such as a global Security Operations Center (SOC) and Computer Emergency Response Team (CFRT)
- Telenor will continue to raise the security level through securing our systems and architecture, in order to address less sophisticated attacks as well as advanced attacks.
- With these capabilities now in place, Telenor is better equipped to cater for current and future security challenges and needs, both on Group and business unit level.
- Telenor Group Security Policy and Manuals were updated during 2017 with the objective of strengthening Group involvement in strategic operational decisions in the business units. The main purpose has been to simplify the governing documents during the annual revision of the Governance Work Program (GWP).

- Furthermore, we are working systematically with the transformation programs in Telenor to ensure that security is an integrated part, and that security and business objectives are aligned. Through this Telenor is strengthening the security levels and controls through several key transformation projects, such as in network virtualization and in common operating model.
- In 2017, we started a global Security
  Training Program for all employees in
  Telenor. The aim of the program is to
  raise awareness related to a broad
  range of security topics, such as
  phishing, secure passwords, and
  encryption, through a set of short and
  interactive lessons.
- In addition, cyber security exercises have been arranged in several business units to raise security awareness with top management.
- Going into 2018, we will explore different concepts to not only create general awareness on security, but enable a security culture as part of every employee in Telenor.
- Externally, Telenor actively contributes to strategic, international security arenas, such as the GSMA Fraud and Security Group, the Information Security Forum (ISF), "Arendalsuka" in Norway and through active membership in the Europol Cyber Crime Centre Advisory Group for Communication Providers.
- The current challenges in the cyber security domain are expected to increase and play an even more crucial role going forward. The industry and society will become more digital and interconnected, for instance by entering into the cloud and IoT domain. For Telenor, this means we shall continuously have to strengthen our critical security capabilities and competencies by establishing a wellfunctioning global security operating model.

- A number of key actions will be prioritised in 2018 to meet the privacy and security challenges, such as:
  - Compliance with changes in the European data protection regulation, related to GDPR
  - Strengthened monitoring of and responsiveness to cyber-attacks
  - Further developing a global operating model for security
  - Further capability upgrade within the area security operations, vulnerability management, security architecture, security culture, security intelligence and physical security.

## **Environment & Climate Change**

- Telenor is committed to minimising its environmental impact. Telenor's business units operate with the policy of making all reasonable efforts to minimise use of natural resources including energy, water and raw materials.
- Climate change is one of the most complex challenges facing people, businesses and governments. Climate related risks include potential damages to vital infrastructure and utilities through the impact of more extreme weather events.
- At the same time the ICT industry's technology and smart services through Internet of Things (IoT) have the potential to cut global carbon emissions, reduce resource intensity, stimulate economic growth and deliver substantial social benefits.
- Telenor continues to engage with the industry organisations – such as GSMA and GeSI – and industry partners to embrace these opportunities.
- The SMARTer 2030 report (co-financed and supported by Telenor) identified a number of sectors where the enabling potential of ICT can deliver significant carbon emissions reduction – up to 20 per cent by 2030 and close to ten times the ICT industry's own direct emissions. This places ICT as one of the key instruments for the achievement of the climate commitments undertaken in Paris and the implementation of related national action plans.

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- The mobile industry will risk continued growth in its total energy consumption and carbon footprint as mobile operators continue to increase their coverage, acquire more customers and develop more mobile broadband services due to market needs.
- The mobile industry requires significant amounts of electricity in Telenor's network operations – and most power is supplied on-grid by national power generation companies.
- In Telenor's Asian operations, the company also relies heavily on diesel used in its on-site generators – to power infrastructure off-grid in remote locations or areas of unreliable on-grid power.
- Telenor's key focus has therefore been to stabilise energy consumption by improving the energy efficiency of its networks, as these represent around 80 per cent of the total energy consumption.
- The business units are focusing on cost-efficient energy initiatives: network swaps, sourcing of energyefficient technologies, infrastructuresharing and energy efficient data centres and buildings.
- Changing regulations, significant reductions in renewable energy costs and concerns about energy security will impact global energy markets.
- Telenor's Asian markets are very different from its European markets – both in the company's carbon footprint and the type of energy that Telenor uses for its network operations.
- In general, developing countries will have the opportunity to leapfrog into the renewable age, and Telenor has already in several of its Asian operations started to replace traditional diesel-based on-site generators with cost-efficient solar/battery renewable energy technology.
- The growing demand for ICT products and mobile devices, and their increasingly short lifespans, has resulted in e-waste becoming a significant concern and risk for the ICT industry.
- In this regard, all business units are mandated to secure sustainable waste management.

- All electronic waste is to be reused, recycled or safely disposed of, and all business units are to ensure that these processes are conducted according to internationally recognised standards and regulations.
- For the fourth year in a row, the global climate reporting organisation CDP (formerly Carbon Disclosure Project) rated Telenor Group in their 'Leadership' category as part of its climate ranking list for 2017. Telenor is still the best telecom company with headquarters in the Nordic region.
- In 2017, the total data traffic volume in Telenor's mobile network was 2600 petabyte - an increase of more than 300 per cent from 2016.
- In 2017, Telenor's total energy consumption was approximately 3,100 GWh – approximately same level as for 2016 when comparing without India.
- In 2017, our Asian operations consumed around 69 million litres of diesel to power base stations in offgrid areas or areas with unreliable ongrid power.
- The associated emissions of greenhouse gases in 2017 for Telenor Group without India have been estimated to be a total of around 1.1 million tonnes of CO2 when using location-based electricity emission factors for the indirect scope 2 emissions
- and close to 1.3 million tonnes of CO2 when using market based electricity emission factors for indirect scope 2 emissions.
- The market-based method reflects the CO2 emissions from the electricity that a company is purchasing, which may be different from the electricity that is generated locally in the country.
- In the period 2012-15, Telenor's energy consumption per end customer (without India) has dropped by approximately 18 per cent and the associated CO2 emissions per end customer dropped 24 per cent in the same period.
- In the period 2015-2017, the Telenor's CO2 emissions per end customer has increased by around 20 per cent due to the significant increase in data traffic volume – still being only approx. 6 kg CO2 per customer per year in 2017.

- In Telenor's Asian operations, the company has in 2017 continued to convert traditional diesel-based onsite generators into renewable energy with cost-efficient solar/battery technology.
- By year-end 2017, Telenor Pakistan had installed solar energy solutions for more than 700 of its base stations and is planning for an additional 250 sites in 2018.
- Grameenphone in Bangladesh has more than 1200 solar powered base stations in place, and similarly Digi in Malaysia has close to 60 base stations powered by solar solutions.
- Also in Myanmar, Telenor has started scaling up with solar/battery technology with more than 80 base stations in 2017 and rolling out solar/battery technology to another 1400 base stations in 2018.
- In 2017, Telenor Group passed 12 million SIM connected devices globally on its IoT platforms.
- Telenor Connexion, Telenor's dedicated IoT company, designs and operates global IoT solutions for the global market.
- More than 61 per cent of Telenor's procurement processes with a contract value greater than USD 250,000 used a specified set of environmental criteria in 2017.
- In addition, more than 177,000
  meetings were carried out in Telenor's
  global organisation using video
  conferencing and virtual meeting
  solutions that are reducing actual
  travel.
- In 2017, Environmental Management Systems (EMS) in line with ISO 14001 were followed up in our business units with the exception of Telenor Myanmar, where planning has started up and EMS implementation will be finalised in 2018.
- Seven Telenor business units are now certified according to ISO 14001: Telenor Bulgaria, Telenor Serbia, Telenor Hungary, Digi in Malaysia, Telenor Montenegro, Grameenphone in Bangladesh and Telenor Pakistan. The revised ISO 14001:2015 standard has so far been implemented in 8 business units.

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- Mobile handset recycling initiatives have been ongoing for several years in nine of our business units: Telenor Hungary, Telenor Serbia, Telenor Montenegro, Digi in Malaysia, dtac in Thailand, Telenor Sweden, Telenor Denmark, Telenor Norway and Telenor Bulgaria, and in 2017 Grameenphone also started their mobile recycling initiative
- Across Telenor, a total of more than 168.000 mobile handsets and mobile batteries were collected and recycled in 2017
- During 2016/2017, updated guidelines/manuals for proper handling of e-waste have been implemented.
- Telenor's key climate measure has been to stabilise the energy consumption in its networks while increasing market footprint, since network operations represent around 90 per cent of Telenor's total CO2 emissions.
- Going forward, Telenor will plan for scale-up of renewable energy combined with continued focus on energy efficiency initiatives in all of its network operations – resulting in both savings in operating expenses and reduced CO2 emissions.

#### **Child Online Safety**

- When it comes to picking up new technologies and services, children and young people have fewer barriers than adults. As a result they are among those that benefit the most from connectivity. But in their exploring they are also often over-trusting and therefore vulnerable. Children's right to safety – online as well as offline – has firm backing in every society. But existing child rights mechanisms and organizations are often struggling to deliver the support that's needed.
- Telenor does not have a direct customer relationship with children.
   But Telenor's services are used extensively by young people.
- Every Telenor Business Unit is therefore involved in efforts to grow the resilience of young people online, and by 2020, Telenor Group companies shall deliver meaningful training on how to be safer online to four million children.

- By year-end 2017, such training had been delivered to more than 1.3 million children and young people.
- A further goal is to contribute to grow a comprehensive ecosystem that takes a 360° view of risks, resilience and roads to recovery.
- Ensuring fool proof child online safety is difficult. There are today numerous devices that offer connectivity and child protection features aren't always easy to set. Once children are online, they will engage through a range of service platforms with different features and risks. Parents have a hard job of keeping up with their children.
- In 2017, Telenor continued to develop the company's position on child online safety by forging new partnerships with influential and strong organisations such as BRAC and Parentzone and by developing the collaboration with Child Helpline International and UNICEF.
- Business Units have worked systematically to deliver on the targets that will enable the company to meet the overall goal of offering meaningful training to four million children by 2020
- The group-wide 'Be Smart Use Heart' brand has now been firmly anchored across most companies in the Telenor footprint.
- Telenor believes the best way to keep children safe is to make them aware of common risks and encourage them to make the right choices. Getting the key messages across in an effective manner is important and almost all Telenor Business Units are involved with physical outreach programmes in schools. Along with this Telenor also makes available a range of digital resources, mainly to parents and children.
- In 2017 Telenor took further steps to coordinate these efforts by contracting Parentzone in the UK to prepare an interactive and progressive curriculum that can be applied at all local Business Units. This curriculum will have separate sections on Understanding the Digital World, Being a Digital Citizen and Recovering When Things Go Wrong. For parents, there will be a section called Raising Digital Citizens. Work on this curriculum is now ongoing and it will be available for the Business Units in the spring of 2018.

- Children will not always get things right, and when they don't it is important that they have somewhere to turn, and that mechanisms for recovery are in place.
- Child helplines play an important role in this respect and Telenor Group has in 2017 supported the development of an e-learning programme that is designed to grow the skills of child helpline staff who receive calls from children.
- Telenor does this in collaboration with Child Helpline International, which is an umbrella organisation for helplines around the world. The goal of this effort is that helplines shall be better able to respond to questions relating to difficult experiences children have had online. At year-end 2017 the elearning tools were completed and rollout will commence in early 2018.
- Surveys conducted among Norwegian parents reveal that many remain concerned about their ability to effectively help their children be safe online.
- In an effort to help those parents
   Telenor Norway has made new
   guidance available at the
   Foreldreskolen.no portal. This includes
   such topics as setting age-limits for
   gaming and social media and
   respecting children's privacy.
- Later in the year a series of experts from e.g. Norway's Criminal Investigation Service, the Ombudsman for Children, UNICEF and the Snapchat school nurse "Helsesista" were introduced through a series of video interviews. These videos have received more than one million hits.
- At the same time, Telenor Norway continued the "Bruk Hue" school outreach programme and in total more than 290,000 children and 60,000 parents have been visited since 2009.
- Digi in Malaysia continued to develop their safe internet capacity building programme in 2017, striving to bring out their message on online risks and digital citizenship.

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- An estimated 8,000 students were reached through regular school modules in 2017, another 21,000 were reached through a mobile learning unit and 18,000 visitors went through an interactive exhibit in Kuala Lumpur.
- Throughout the year Digi continued its close partnership with UNICEF, through research workshops and a series of townhalls on Healthy Teen Relationships & Online Dating, targeting rural communities in Malaysia.
- Bangladesh has a large young population with 74.6 million young people under the age of 24 who are starting their digital journey.
- As the largest mobile ISP in the country Grameenphone is committed to contribute to a safer internet experience for this segment by empowering marginalized schoolchildren, especially girls, to make the right decisions on how to interact and engage through the internet.
- The programme also aims to reduce gender inequality around internet access and usage. Grameenphone is also working to sensitives parents, guardians and teachers on internet safety.
- Since, 2014 Grameenphone has educated 140,000 children through 600 schools across Bangladesh and directly engaged with 35,000 parents, teachers and guardians. 250,000 copies of communications material have been distributed and 700 employees participated in the programme as ambassadors.
- To ensure scalability Grameenphone has partnered with the largest NGO in the world, BRAC, which operates the largest non-formal education program in the country.

- In February 2017, UNICEF and Telenor Montenegro joined forces with the Montenegrin Government to launch #EndViolence, which aims to tackle the negative effects of violence, neglect and dysfunctional parenting. As part of the project, UNICEF launched the mobile app #Net Friends, focused on educating children on online violence. The app contains an educational roleplay game, which takes children through real life scenarios and makes them learn how to recognize, prevent, stop and report violence. During May and June 2017, 80 teachers from nine schools in the capital Podgorica were educated on online safety and these teachers held workshops for 1300 pupils, taking them through scenarios from the #NetFriends application.
- Building on this first collaboration between UNICEF and Telenor in Montenegro, the cooperation between Telenor Montenegro and UNICEF was furthered by the signing of a three-year agreement on "Digital literacy for every child" in October 2017
- During March and April 2017, together with partners, Telenor Denmark ran an online video competition targeting school children from 4<sup>th</sup> to 6<sup>th</sup> grade. The purpose was to engage children on the topic of digital bullying and encourage them to record a video of how digital bullying is experienced through their eyes. More than a 100 classes participated in the competition.
- In 2018, Telenor will continue to run significant outreach programmes to achieve the ambitious target of reaching four million children by 2020.
- In this effort we will ensure the involvement of our specialist partners, both to ensure the quality of the materials and guidance we make available and to ensure that the content is current and engaging.
- With the new Digital Citizenship curriculum Telenor will also significantly add to the online resources available on our websites
- To ensure that the work undertaken in this area is meaningful to the defined target audience it is important to strive to listen to the voices of children and young people as well as their parents.

## **Digital Outreach**

- As an increasing number of services are becoming available online, connectivity is becoming even more important in the effort to empower societies. Telenor sees this development as integral with the company's commitment to reduce inequalities in the societies where it operates. Clearly the greatest challenges relating to access are in the emerging markets in South Asia, but the challenge of ensuring an inclusive internet is relevant for everyone. Telenor remains committed to bringing the benefits of digital access and outreach to all.
- By year-end 2017 Telenor had rolled out 4G mobile technologies in all our markets, besides Bangladesh. All business units had also rolled out Wi-Fi offerings. In its mature markets, Telenor is adding network capacity to sustain and improve the mobile data user experience as networks become congested.
- In Pakistan, Telenor continued to develop Khushaal Zamindar, which is a free of charge Interactive Voice Response (IVR), robot-call and SMSbased service providing localised, contextualised and customised weather forecasts and actionable agriculture advisory to farmers.
- The service provides information on a range of cash crops, fruits & vegetables, fodder and livestock in three different languages.
- There are now more than four million monthly active users, across Punjab, Sindh, Gilgit Baltistan and Chitral.
- Almost 90% of farmers in Pakistan are smallholders out of which at least 60 per cent grow crops for subsistence.
   These farmers have limited or no access to agriculture information which results in primitive farming techniques or poor farm management.
- Khushaal Zamindar is in effect bridging the information gap between smallholders and the large progressive farmers.
- As an extension of this successful concept, Khushaal Aangan is aimed at empowering Pakistan's female farmers.

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- In December 2017, in partnership with Punjab Livestock and Dairy Development Board, Telenor Pakistan launched a free of cost IVR service designed for female farmers in Punjab.
- Appreciating the cultural sensitivities in the rural setting of Pakistan which inhibit access to phones by females and interacting with male voices on the other side, a dedicated information service for females addressing their specific needs is an ambitious effort towards digital inclusion of smallholder farmer
- Khushaal Aangan was able to sign up more than 30,000 users in less than one month
- Telenor Denmark's "Kør Godt" is a free driving app that enables users to track and improve their driving skills. It is the only telematics based insurance product on the Danish market that does not require the user to install any kind of technical equipment in the car. "Kør Godt" enables all users to capitalize on their own data either in a very direct way by using them to have a fair discount on their car insurance or utilizing them to monitor their own skills behind the wheel and becoming better drivers.
- Telenor Hungary's E-Tanoda programme enables digital tutoring based on a peer-to-peer concept where students from the top-performing Budapest secondary schools mentor children, mostly from Roma communities, living in disadvantaged settlements. This pilot project started in January 2017 and was later extended to two new rural sites in five secondary schools in Budapest. Telenor has been working with Microsoft and the Foundation for 21st Century Pedagogy on the project.
- In 2017, dtac continued to develop its SMART farmer project in Thailand, which aims to empower farmers through access to knowledge and information on their mobile phones.
- In partnership with the Thai Ministry of Agriculture and Cooperatives, dtac has run extended online marketing training courses nationwide to help farmers successfully present and sell their products online.

- This has included sessions on the essentials of communications technology, online marketing for agricultural products, required resources required for doing ecommerce, risks of financial scams, trust protocols as well as workshops on how to build online stores.
- Dtac has also partnered with Thailand's National Electronics and Computer Technology Center and the Department of Agricultural Extension, inventing an IoT solution for agriculture. The device, a sensor with the capability to monitor five parameters (light, soil humidity, temperature, water and wind) is linked to a router with a dtac SIM relaying this information to the cloud. The solution will enable the sending of targeted advisory information to farmers based on farm-level granular data, thereby helping smallholder farmers achieve productivity gains. The solution will e.g. help monitor and automatically adjust temperature in a storing room depending on crop specificity. In early 2017, thirty sets of devices were installed and trialled by farmers across the country.
- Telenor Myanmar's digital literacy centres, the Lighthouses, are multipurpose online hubs for local communities in Myanmar. They serve as digital literacy centres, they host child online safety sessions as part of Telenor Myanmar's outreach work, they are part of the company's point of sale network and they are often local printing hubs.
- Since November 2015, close to 100,000 students have received online safety training at Telenor Myanmar's Lighthouses
- During 2017, some Lighthouses were discontinued, as they were not successful in fulfilling their role in the local community. Other centres were established in the same period and 61 Lighthouses were in operation at yearend 2017.

#### **Innovating Shared Value**

- Telenor strives to introduce innovative uses of digital communication to improve people's lives, with solutions that can address social, economic and environmental problems, close the inequality gap and empower societies.
- Telenor is committed to helping world leaders achieve the UN Sustainable Development Goals that were set in 2015
- Leveraging the power of mobile for sustainable development includes applying innovation, resources and expertise to pursue the business opportunities inherent in building a greener, more equitable and inclusive society.
- In Telenor, research is key in helping
  the company gain insights and
  competencies to become a data driven
  software organization. This ambition
  also has a sustainability dimension.
  Research in using big data the
  information flow from digital
  communications analysis has the
  potential of providing important
  insights that can help tackle socioeconomic challenges, such as the early
  identification and prevention of
  diseases.
- In 2017, Telenor and UNICEF
  continued the global partnership to
  leverage the reach and capability of
  connectivity for children's rights and
  development. In 2017, Telenor and
  UNICEF continued building on their
  strong collaborated on promoting child
  rights and Safe Internet in Bangladesh,
  Thailand, Malaysia, Denmark and
  Hungary and stepped up their
  partnership in both Serbia,
  Montenegro and Norway.
- In Pakistan, Telenor, UNICEF and government authorities are collaborating to improve the birth registration rates using cellular technology. In line with the global goals, the project will empower unregistered children with legal identity that can help curtail child labour, trafficking and marriages as well as ensure availability of authentic and timely data for better planning and access of public services like justice, health, education and immunization.

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- Given the learnings during infrastructure development and deployment, which among others included the need for further time investment in quality capacity building, the project has been delayed and will not reach the target for 2017 to register the births of 700,000 children.
- Nevertheless, the project has been scaled up to five districts in the provinces of Sind and Punjab in 2017.
- A significant ramp up in design and scale from the pilot, the public birth registration infrastructure is now digitized in the target districts and more than 4200 designated government facilitators are trained and equipped to report births via Telenor's mobile based solution.
- Designated facilitators have started reporting data with more than 100,000 birth reports submitted and 20,000 births registered as of end of 2017.
- The target set by the partners for 2018 is to register the births of 700,000 girls and boys.
- In Thailand, dtac, UNICEF and the Ministry of Health are continuing their work providing users with free mobile information services to promote healthy mothers and children. In our systems we registered more than 280.000 active subscribers in 2017.
- In 2017, the efforts of Telenor Serbia, UNICEF and local authorities continued to enable the social inclusion of the Roma population in Serbia including connecting this population to health services.
- Telenor is focusing on initiatives aiming at promoting the financial inclusion of women.
- In Myanmar, Wave Money, with support from the UN Capital Development Fund, is developing a gamified smartphone app to strengthen financial literacy among women in remote areas. Through the gaming application people will learn about savings, interest payments and insurance while they play. The app will be launched in 2018.

- Wave Money is working with Save the Children to provide income support as well as financial literacy training.
   Beneficiaries receive transfers via
   Wave Money. Through targeted financial literacy trainings,
   beneficiaries learn how to plan a budget and to save for small investments to run a small business.
- Easypaisa is supporting the Benazir Income Support Programme that provides income support to underprivileged families. The female recipients are provided with a monthly disbursement and the beneficiaries use mobile phones or specially designed ATM cards to cash-out their benefits via a mobile money agent. The program focuses on woman empowerment to ensure provision and family substance. Easypaisa facilitates access to funds in remote areas of Pakistan and Easypaisa currently distributes funds to approximately 1.5 million unique beneficiaries as part of this program.
- Telenor Group is offering life and health insurance to customers in several markets. Grameenphone's Nirvoy Life Insurance systems' increased its customer base to approximately 5,670,000 in 2017.
- The aim of the service is to act as a mass loyalty product in addition to offering Grameenphone customers a social safety-net.
- Easypaisa's first mass market health insurance Sehat Sahara reached 125,000 subscriptions in 2017.
- Telenor Health, a digital health subsidiary established by Telenor
   Group in 2015, leverage technology to help make high quality health and wellness information, advice, and services accessible to everyone, particularly for people in emerging markets.
- In Bangladesh, Telenor Health continued their partnership with Grameenphone to offer "TonicFree", a free service to all active Grameenphone subscribers as part of an effort to drive both societal impact and customer loyalty.

- The service includes discounted access to a qualified doctor over the phone, discounts on services at over 200 hospitals, diagnostic centres, and pharmacies, health and wellness content and free "hospital cash" insurance coverage to help with cost such as lost wages and medications.
- By end 2017, more than 4.7 million Grameenphone subscribers had joined TonicFree, with the member base growing by as much as 20,000 per day
- In April 2017, Telenor Health and Grameenphone launched the first two customer-paid Tonic products, "Tonic Astha" and "Tonic Shurokkha". Aimed at the emerging middle classes, Astha and Shurokkha include more comprehensive health insurance coverage and free access to doctors via phone and chat, making high-quality healthcare more accessible. Grameenphone and Telenor Health have sold paid Tonic offerings to both business customers and consumers, including through new channels such as pharmacies.
- Based on our 2015 study using big data for social good analysis for studying the spread of dengue in Pakistan, and the impact of human mobility, Telenor Group has continued our collaboration with Harvard's TH Chan School of Public Health.
- Throughout the year, preparatory work for studies on the spreading of multi-resistant malaria in a contiguous, three-nation area (Thailand, Bangladesh and Myanmar), has been conducted.
- The work is now 90 per cent on the way towards the big milestone of full approval and first level data extraction in all three countries.
- Opportunities to explore a study of dengue in Malaysia are also being explored. We are also looking at other potentially interesting insights to be garnered from this kind of research, e.g. studying influenza in Norway

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#### **Mobile Phones and Health**

- At all its base stations and antenna installations, Telenor is committed to adhering strictly to national and international guidelines for health and safety.
- Across Telenor, our business units work in accordance with the guidelines provided by national regulations and the International Commission on Non-lonizing Radiation Protection (ICNIRP). These guidelines are endorsed by the World Health Organisation (WHO) and represent the basis for all planning, installation work and safety measures at antenna sites
- Telenor is also committed to recognising and respecting the public's interest in acquiring environmental information about electromagnetic fields, and striving to provide stakeholders with accurate and relevant information relating to installations, services and products.
- As far as EMFs in the frequency ranges used for mobile communications are concerned it is important to note that the WHO has concluded that 'Considering the very low exposure levels and research results collected to date, there is no convincing scientific evidence that the weak radiofrequency signals from base stations and wireless networks cause adverse health effects.
- The WHO further states that 'research has not been able to provide support for a causal relationship between exposure to electromagnetic fields and self-reported symptoms, or electromagnetic "hypersensitivity'.
- However, as mobile and wireless solutions become ever more ubiquitous, concerns about possible health risks from the long-term use of mobile communication solutions or from living near mobile communication towers are voiced in all the countries in which Telenor companies operate.
- For further information; www.telenor.com/sustainability/responsible-business/safe-services/mobile-phones-and-health/

## **Service Reliability**

- 2017 was also a year when millions of people were affected by heavy flooding in our markets in Asia.
- In Myanmar, Telenor provided lifesaving food, water and sanitation items to flood affected households in Pakokku township, one of the three worst affected townships in the Magway Region during the flooding in August. Provision of relief assistance was carried out by Telenor's implementing partner Network Activities Group (NAG). A solarpowered mobile phone charging station for affected people helped to keep them connected.
- In August, Bangladesh faced one of the worst flood situations in decades.
- As a conscious corporate citizen, Grameenphone came forward to support those affected. Cascading rain waters from the mountains, coupled with the heavy monsoon rains in Bangladesh itself, burst the banks of the rivers and flooded low-lying Bangladesh. Grameenphone came forward to support those most badly affected through its disaster response partner, the Bangladesh Red Crescent Society (BDRCS). Grameenphone network teams also worked day and night to ensure that the GP network remained, as always, the most resilient in the face of such a calamity.
- Tropical storms in August led to severe flooding in the northeast provinces of Thailand, which affected dtac's network installations. Dtac emergency teams surveyed at incident areas and reported back to relevant parties for urgent action. Further, dtac coordinated with the government to donate survival kits, and also provided free air-time to victims in the incident area.
- A storm caused power outages and transmission interruptions at 35 base stations in Montenegro at the beginning of January.
- Storm and heavy rain in south, southwest and western Serbia caused power outages on 106 base stations in September.

- In both situations, power company teams and Telenor teams solved power problems on most of the sites quickly and the functioning of the network was restored within 24-48 hours.
- 2017 ended with two storms, Ylva and Aina, both with moderate impact on the network. Electricity outages and fibre damage were the main reasons for Telenor's customer impacts. A mobile mast collapsed due to strong winds during Ylva in November 2017. The mast was rebuilt and critical services were re-established before Christmas.
- Telenor Norway has, since the Dagmar (third strongest storm to hit Norway in 50 years) swept over the country in 2011, increased reserve power capacity at its installations, enhanced battery backup at several base stations, and acquired high-tech mobile trailers ready to cater for communication in crisis areas.
- Telenor Norway also has mobile generators, which can supply electricity to communication equipment during serious power failures. In addition, the company runs emergency drills and maintains a dialogue with relevant authorities about robustness and emergency response.
- 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.

# **How Telenor Impact Societies**

- Telenor's global business contributes
  to society in a multitude of ways. Our
  digital services impact local economies
  via direct value creation, innovation
  and productivity gains in other
  industries, employment, investments
  in future value creation, and
  contribution to public finances via
  taxes and other levies.
- We also believe that our business impacts social standards positively by exercising good corporate governance and compliance with good business conduct, and by enhancing sustainable business practices which drive the focus on social and working conditions in other sectors.

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- Telenor are committed to UN
   Sustainable Development Goal #10
   Reduced Inequalities as we believe this is where we can deliver the most impact. We believe the most effective way for us to contribute to this goal is to deliver wider access to our services and to raise the standards of our own work and help raise those of our partners in society.
- We are focused on amplifying and accelerating our impact on the SDGs, through working with partners on initiatives such mobile birth registration, growing children's resilience online and focusing on decent working conditions in our supply chains. We have set targets for this work and have reported on progress in this report. From services, such as mobile money and mobile agriculture, to big data for social good and mobile health services, we're making a difference and contributing to the Sustainable Development goals.
- It is Telenor Group's responsibility and our ambition to contribute to economic, environmental and social development in countries where we are present, acting with accountability and transparency. We aspire to be a trusted company, recognized for strong business ethics. We recognize all States sovereign right to introduce new tax legislation and to amend old legislation. We understand the importance of the taxes we pay in supporting the development and growth of the communities in which we operate and take a responsible approach respecting our tax obligations.
- We support a stable and transparent fiscal environment that is based on universal tax principles, levying tax based on predictable legislation applied by objective authority, and tested by independent court systems. Our aim is to engage constructively in dialogue with relevant authorities on tax legislation such as review of tax rules and the need for any changes. We support initiatives to improve international transparency on taxation matters, including OECD measures on country-by-country reporting and automatic exchange of information.

- Telenor Group has an internal Policy on Tax. This Policy is approved by our Group President & CEO. The Policy is owned by our Group CFO, who is responsible for the tax strategy, the supporting governance framework and for management of tax risk.
  - Day-to-day responsibility for each of these areas sits with the Group Head of Tax, who reports to the CFO, and will be communicating our tax strategy throughout the group. Furthermore, Telenor's Code of Conduct is our backbone, defining the ethical standards for how we all conduct our business.
- Telenor Group shall be a prudent tax payer worldwide, and is committed to ensuring compliance with all relevant legal tax filing, tax reporting and tax payment obligations globally. We recognise a responsibility to pay the correct amount of tax in each of the jurisdictions in which we operate. We may respond to tax incentives and exemptions, and aim to avoid double taxation on capital gains and dividend repatriation. Contracts entered into between separate legal entities within the Telenor Group shall be documented and be in accordance with the arm's length principle.
- We shall be open and transparent with tax authorities about our tax affairs, and provide the information that is necessary for those authorities to perform their work in a collaborative, courteous and timely manner.
- Telenor Group aims to apply diligent professional care and judgement, including ensuring that all decisions are taken at an appropriate level and supported by documentation that evidence the judgements involved. We shall always be able to defend our positions, and external advice may be sought in relation to areas of complexity or uncertainty to support the Group in complying with its tax strategy.
- We aim to manage tax risk in the same way as any other operational risk across the Group. Business heads will generally take the lead role in identifying, managing and monitoring tax risks within the business.

- Business heads are required to immediately notify the Tax Policy owner about matters that may represent a tax exposure, and continuously update the Tax Policy owner on any subsequent developments.
- In international matters, we shall follow the terms of the relevant Double Taxation Treaties and relevant OECD guidelines in dealing with such issues as transfer pricing and establishing taxable presence.
- Concerns with regard to so-called tax havens have been mounting in recent years. Extensive efforts are ongoing internationally to prevent tax evasion and non-disclosure of financial information through the use of tax havens. Norwegian authorities have concluded tax information exchange agreements with a number of new countries. Norwegian requirements for country-by-country reporting have so far only been introduced for large companies and the issuers of listed securities in the extractive and forestry industries.
- Since 2014, Telenor Group has communicated a sincere commitment to corporate responsibility by voluntarily reporting country-bycountry incomes and tax contributions. We support initiatives to improve international tax transparency, including OECD initiatives for country-by-country reporting and automatic exchange of information.

## **Economic Contributions to Society**

There is an increasing focus on the discrepancy between the positive growth effects of globalization and digitalization, against the unequal distribution of the gains of this development. In many countries, stable economic growth combines with stagnant, or even falling real incomes for parts of the population.

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- We believe that we can contribute in two basic ways to close the emerging inequality gap. We already contribute to reduced inequalities by providing internet access, digital and financial inclusion, which again empowers entrepreneurship among those in need of new income. Further, our contributions to public finances enable public services in education, health, and other services that benefit all. We support the obligation of corporate organisations to pay they lawful and legitimate, due share of taxes and levies in the countries of local operation. Still, it is largely in the hands of local governments to ensure that legitimate tax revenues have a socially just effect on society via public services.
- Telenor is dedicated to enhancing mobile communication and digital services to facilitate economic development and better public services.
- The role of mobile services and digital access in economic growth and innovation is becoming increasingly evident. The vital role of digital services was acknowledged in 2016 when both the European Union and several national governments devised digital modernization strategies, including in the Nordic countries, Hungary, Pakistan, and Thailand.
- In 2017, Telenor made enhanced contributions to the Digital Norway initiative by investing in the Norwegian Industry 4.0 centre (Toppindustrisenteret).
- Telenor also engaged in national dialogue with governments on improved telecom frameworks in Myanmar and Bangladesh.
- Telenor has reported our country-bycountry earnings, investments, taxation and employment, since 2014.
- Telenor advises governments to forge tax systems based on universal tax principles as advocated by the IMF and World Bank, with universal tax levels across a broad tax base.
- Tax collection practices should rest on predictable legislation applied by an objective authority, tested by independent courts. Predictable and universal taxation is a crucial safeguard for efficient investment and affordable services for everyone.

- Mobile communication creates a vibrant ecosystem of large and small businesses that employs millions in Telenor's markets.
- During the coming years, Telenor is committed to invest further in our markets in support of the ambition to capture new growth opportunities, enhance internet access and connectivity, and improve efficiency.
- In 2016, a study conducted by KPMG quantified Telenor's economic contribution to our 13 countries of operation, at a total of USD 20.3 billion (NOK 163.8 billion) in 2015, divided between USD 7 billion (NOK 56 billion) in direct gross value added by our own business, and a further USD 13.4 billion (NOK 107.8 billion) value added induced in other companies through our local value chains and employee spending.
- The methodology to estimate direct value added was further elaborated at company level in December 2016 (Telenor Research 05/2016: Telenor in the National Economy: A Methodology).
- The corporate income tax rate has been reduced in some countries over the last years, which will have an impact on our payable taxes.
- Entering 2017, Norway reduced the corporate income tax rate from 25 per cent to 24 per cent, and in 2018 the tax rate will be 23 per cent.
- In Hungary, the corporate income tax was reduced from 19 per cent to 9 per cent in the same period
- However, corporate income tax (CIT) is only one part of our total tax contributions - we also pay several industry-specific taxes, fees, indirect taxes (VAT, GST, sales tax etc.) and customs duties.
- Telenor Group follows the terms of applicable Double Taxation Treaties, relevant OECD guidelines in dealing with transfer pricing and establishing taxable presence, and the recently introduced BEPS initiatives. We endorse the aims of transparency and fairness across the global tax system, exchange of financial information, and concerted action to fight base erosion and profit shifting. Our policy and practice is in line with legislation in all our markets.