

SUSTAINABILITY REPORT 2019



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CONNECTED TO WHAT MATTERS MOST



At the time of writing, the world is grappling with a public health crisis. In every society, people are exploring new ways of educating their children, running their businesses and maintaining critical societal functions. The health and welfare of millions of people are at stake. When a crisis like COVID-19 hits, it is a reminder of our shared commitment and responsibility to support the societies we are part of.

At Telenor, we have a purpose, which is about connecting people to what matters most and empowering societies. In the light of the COVID-19 situation, this purpose is more relevant than ever. Mobile technology is already at work to help the world address the current crisis. Telenor is involved in a range of initiatives to assist government agencies and to help people and businesses cope with the disruption they face. Our commitment to

responsible business conduct and our ambition of empowering societies remain firm. In 2020 and beyond, we will continue to explore new ways of creating positive impact for customers and societies.

At Telenor, we fully support the UN's 2030 Agenda for Sustainable Development and the Global Compact Principles. Together with our partners, customers and stakeholders we are striving to raise standards in our operations and supply chains. Across our markets, we are providing access to services and opportunities that help the world deliver on the UN Sustainable Development Goals. The empowering capabilities of mobile phones have led us to focus particularly on SDG 10, "Reduced Inequalities".

Climate change is the greatest challenge of our generation. Over the

last decade, Telenor has strived to deliver transparent reporting of our emissions. We have focused on energy efficiency initiatives in our network operations, understanding climate-related risks and the business potential for delivering climate-friendly technologies. Going forward, we will step up these efforts and seek to further reduce our carbon footprint. Our people and our culture are at the heart of our commitment to sustainability. We all share the same ambition, as SDG 10 is part of our global business strategy. We are confident that by providing access to essential services and by contributing to improved working and operating standards, we will foster inclusion and empowerment in all the markets we serve.


Sigve Brekke, President & CEO
Telenor Group

SUMMARY OF 2019

RESPONSIBLE BUSINESS

Responsible business and sustainability is an integral part of Telenor's business strategy. It is about how we do business.



DIVERSE WORKFORCE

Telenor Group employed close to 20,000 as of year end 2019 (including DNA), of which 37% are women. 30% of senior leadership positions are held by women, a 2% increase from 2018.



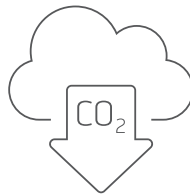
SUPPLY CHAIN SUSTAINABILITY

Telenor carried out 3,600 supplier inspections resulting in 650 major nonconformities, 81% of which were closed by year end 2019. In addition, the business units carried out close to 25,000 man-hours of capacity building among our suppliers.



DIGITAL BIRTH REGISTRATION

By year end 2019, more than 780,000 children have been registered in five districts of Pakistan through Telenor's Digital Birth Registration solution.



CLIMATE FOOTPRINT

In 2019, Telenor's total carbon emissions increased by approx. 9%, while carbon emissions per petabyte of mobile data traffic decreased by approx. 29%, since the total mobile data traffic increased by approx. 51% - all data compared to 2018.



ETHICS AND COMPLIANCE

In 2019, 704 incoming reports were logged through the Integrity Hotline. Reporting volume per 100 employees in 2019 was 3.2, an increase from 2018 and 2017.



REDUCED INEQUALITIES

We are committed to all UN Sustainable Development Goals and have a particular opportunity through our business to advance SDG 10 Reduced Inequalities.



CHILD ONLINE SAFETY

During 2019, training on how to be safer online has been delivered to 1.2 million children, resulting in the education of a total of 3.3 million children and young people.



SOLAR ENERGY

By year end 2019, Telenor has installed solar energy solutions for close to 3,000 base stations in Asia up from 2,500 in 2018

SUSTAINABILITY AT TELENOR

About the report

Telenor publishes this Sustainability Report in accordance with reporting requirements mandated by the Norwegian Accounting Act §3-3c and the EU non-financial reporting directive. The report covers what Telenor does to promote, uphold and recognise human rights, labour rights, social issues, climate and environment issues, and anti-corruption measures into the business strategy, daily operations and relationship with stakeholders. The report covers information on policies, principles, procedures and standards the company uses to integrate the above considerations. In addition, other material issues, in-line with stakeholder expectations as well as Oslo Stock Exchange's guidance on the reporting of corporate responsibility, are addressed.

The Finnish company DNA was consolidated on 21 August 2019. DNA publishes its own sustainability report for 2019, and this report does not include sustainability performance data from DNA's operation in 2019.

DNV GL has been commissioned to carry out an independent review of the Sustainability Report, in particular to assess the accuracy of claims.

More information at www.telenor.com/sustainability/reporting/scope-and-principles.

Responsible business conduct in Telenor

The foundation for Telenor's strategy is its purpose: Connecting you to what matters most – empowering societies.

Telenor has set long-term targets towards 2030 to reduce 50 per cent CO₂ emissions in Asian operations and 100 per cent CO₂ emissions in Nordic operations.



Telenor is committed to responsible business conduct, and is driven by the ambition to reduce inequalities and empower societies.

Telenor fully supports the UN Global Compact Principles, and together with customers and partners, is well positioned to help deliver on the UN Sustainable Development Goals (SDGs). Telenor has chosen to focus particularly on SDG 10 Reduced Inequalities, which is embedded in the global business strategy. The company has set itself SDG 10-related targets by the end of 2020, and has been reporting on progress since 2016.

Telenor's efforts to reduce inequalities include both providing access to services that foster inclusion and empowerment, and striving to raise working conditions and operating standards wherever

Telenor is present.

Access to services includes promoting digital inclusion by extending connectivity, building digital skills and resilience, and stimulating digital identity projects. This also includes making available financial inclusion services, health and education services, and big data/machine learning/AI solutions to further enhance and personalise services.

Furthermore, Telenor is striving to raise standards in its operations and supply chain. This includes increasing employee involvement, promoting health, safety and people's security, and reinforcing supply chain risk management. This also includes respecting and supporting human rights, protecting customer privacy, strengthening cybersecurity, maintaining standards of safe mobile

communication, and implementing diversity and inclusion policies. Climate change is a defining agenda of our times, and Telenor has set long-term targets towards 2030 to reduce 50 per cent CO₂ emissions in Asian operations and 100 per cent CO₂ emissions in Nordic operations.

Telenor's business environment will become increasingly complex as digitalisation and the demand for connectivity proliferates. Some of the markets in which Telenor operates are emerging economies, with potentially complex and sensitive political and social contexts. Telenor continues to deploy sound corporate governance mechanisms, continuous focus on Telenor's Code of Conduct and anti-corruption measures, as well as processes to respect and support human rights.

Telenor faces a more severe threat landscape, higher expectations from customers and stakeholders, as well as increasing regulations and legislation. The company actively engages with stakeholders, and will continue strengthening its relations as a long-term owner and business partner, committed to its values and to the ambition of reducing inequalities and empowering societies.

In 2020, responsible business conduct at Telenor will continue to focus on the most critical business environment risks, seizing the opportunity to generate positive long-term value and meeting stakeholder expectations. Strengthening awareness, accountability and transparency will remain key to securing our licence to operate and ensuring ethical and responsible business practices. Telenor will also continue to raise standards in its operations and supply chain, and will provide access to services and skills for a digital future to positively impact societies where it operates.

More information at www.telenor.com/sustainability/strategic-direction.

RESPONSIBLE BUSINESS PERFORMANCE

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 and agreed governing documents. The governance framework is used as a platform to integrate material sustainability issues into business strategies, daily operations and relationship with stakeholders.

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 2019 on page 16–39, and at www.telenor.com/about-us/corporate-governance.

Code of Conduct Policy and actions

The Telenor Code of Conduct is owned and approved by the Group Board of Directors. The Code of Conduct embodies Telenor's commitment to high ethical standards. Telenor strives to be a trusted partner of all customers, shareholders, vendors and employees, and to the communities where Telenor operates. Telenor's business depends on this trust, and Telenor is committed to conducting its business in a responsible, ethical and lawful manner.

Telenor's commitment to integrity and transparency is stated in the Code of Conduct. The principles of transparency at Telenor are part of the corporate governance framework and are implemented within company operations.

The Code is applicable to all Telenor employees, board members and hired

personnel. The Code is available on digital platforms and all devices, with links and drill-down functionalities, which provide immediate access to Telenor's governing document framework.

It is viewed as a sign of openness and trust that employees, suppliers and other stakeholders speak up about possible non-compliance with the Code of Conduct. This allows us to address their concerns, investigate and take disciplinary action when needed, and to learn from and prevent similar issues from reoccurring. Managing breaches of the Code of Conduct is an important part of Telenor's compliance programme.

To encourage a speak-up culture, Telenor has established a global external reporting hotline, the Integrity Hotline, which is a confidential channel where anyone can ask questions or raise concerns about misconduct. The Integrity Hotline is available at secure.ethicspoint.eu/domain/media/en/gui/102575/index.html.

Status and ambitions

In 2019, 18,292 employees completed the eLearning programme for the Code of Conduct with dilemma training, and signed the Code of Conduct, which represents 100 per cent of the work force in scope.

In 2019, 704 incoming reports were logged through the Integrity Hotline, of which 38 per cent were submitted anonymously. The reporting volume per 100 employees in 2019 amounted to 3.2, which indicates an increase compared to both 2018 and 2017.

All incoming reports are assessed by the centralized Group Investigation team. The reports that are assessed to meet defined criteria on materiality, are further handled by Group Investigation. From 1 January to 31 December 2019, the Group Investigation team initiated 19 investigations and completed five Investigations that were started in 2018.

At year end 2019, three investigations remained open. About 48 per cent of the incoming reports were concerns pertaining to other parts of the organisation, falling below the threshold for Group Investigation, and thus followed up by line management or HR.

Group Internal Audit and Investigation handles the investigation of alleged breaches of the Code whereas the Compliance Function handles the resolution of substantiated breaches. Investigated cases and its resolutions are reported regularly to both the Board Sustainability and Compliance Committee and the Board of Directors. The resolution of substantiated cases may involve disciplinary actions towards individuals and corrective actions, which strengthen Telenor's policies or procedures.

More information at www.telenor.com/about-us/corporate-governance/governance-in-telenor.

Anti-corruption Policy and actions

Telenor has zero tolerance for corruption, and the Code of Conduct prohibits corrupt conduct in all business activities. Telenor's management sends clear, unambiguous and regular messages to all employees and business partners that any form of corruption is unacceptable. Telenor has implemented a risk-based Anti-Corruption Compliance Programme to prevent, detect and remedy corruption risks in all subsidiaries directly or indirectly controlled by Telenor Group. Where Telenor is not a controlling owner, these companies are required to comply with an ethical standard that is consistent with Telenor's, and to operate within a risk-based compliance framework. Risks relating to corruption include bribery and trading in influence.

Status and ambitions

Telenor seeks to work with business partners who share its commitment to ethics and compliance and, in 2019,

Telenor strengthened its processes around third-party background checks by establishing a digital platform to more effectively gather, manage and use information related to its vendors.

LOOKING AHEAD: Telenor also seeks to support its employees identify corruption risks and, in 2020, Telenor will strengthen its Anti-Corruption eLearning programme. The eLearning programme aims to build awareness and empower Telenor's employees to manage the risks that they may face. Telenor will further develop the anti-corruption risk assessment and reporting processes to ensure that risks are identified and properly managed.

More information at www.telenor.com/about-us/corporate-governance/anti-corruption.

Employee involvement Policy and actions

Telenor is committed to respecting labour rights principles as laid down in the UN Global Compact and International Labour Organisation (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 workplace, 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 and their recognised employee representatives, and by utilising the employees' experiences and insights to influence working conditions and contribute to sustainable business growth. Telenor Group is, throughout its operations, promoting partnerships based on good and trusting dialogue, for example in relation to acknowledged unions, or through local cooperation bodies such as the People Council.

All workforce restructuring in Telenor shall be done with the aim of creating and sustaining long-term business value. Workforce restructuring shall be done in a responsible manner, through verifiable processes and in accordance with Telenor's purpose and behaviours, and applicable legal requirements and legislation.

Status and ambition

In 2019 the Telenor Works Council – Europe (TWC-E) held two meetings, one in the spring and one in the autumn, where European employee representatives met with the Telenor Group Management. After the acquisition of DNA in Finland, employee representatives from DNA participated as observers and will be members of TWC-E from 2020 onwards.

Additionally, Telenor has continued its commitment to promoting employee involvement in operations throughout the Group. GPEU (Grameenphone Employees Union) was registered by the Labour Directive of Bangladesh as a union in March 2019. As a consequence, Grameenphone signed a Recognition Agreement with GPEU in October 2019.

The Frame Agreement between Telenor Group and UNI Global Union expired in May 2017 and has been up for renegotiation. In November 2019 Telenor Group and UNI Global Union agreed upon a renegotiated Agreement. The official signing took place in February 2020.

LOOKING AHEAD: Whilst undergoing business transformation, Telenor will continue to promote employee involvement throughout Telenor Group and maintenance of good labour standards in the company's operations.

More information at www.telenor.com/sustainability/responsible-business/labour-rights-and-standards/dialogue-initiatives.

Building a diverse and inclusive culture

Policy and actions

Telenor is an equal opportunity employer, and diversity and inclusion is imperative to the way Telenor does business. It is about creating services and solutions that include different perspectives from employees, customers, stakeholders and partners.

Discrimination is against Telenor's Code of Conduct, and it is interpreted that no direct or indirect negative discrimination shall take place based on race, colour, gender, sexual orientation, age, disability, language, religion, employee representation, political or other opinions, national or social origin, property, birth or other status.

Status and ambition

Telenor started the journey of systematically working with diversity in 2014. In 2019, the diversity agenda was broadened from gender balance to focus on abilities, competence, nationalities and LGBTI inclusion.

By year end 2019, 30 per cent of senior leadership positions are held by women, a 2 per cent increase from 2018, while those in total workforce remained stable at 37 per cent. The mix of nationalities in Telenor's senior leadership was also more diverse compared to 2018. All senior recruitments were approved by the President and CEO.

In 2019, Telenor continued to support various diversity networks like WIN (Women Inspirational Network in Grameenphone, FEN (Female Empowerment Network) in Norway, and Telenor Rainbow in Norway and Sweden, which brings together the LGBTI community in Telenor. Telenor Norway also participated in the Pride for the first time. Telenor continued to support Student Women Leadership Program in partnership with McKinsey, and the Girls in Tech collaboration with Plan International.

Telenor's Open Mind programme continued to provide meaningful work opportunities to persons with disabilities. In Norway alone, where the programme also includes qualified non-EU immigrants, approximately 340 people have successfully graduated. In Pakistan, approximately 90 people have graduated from the programme.

LOOKING AHEAD: Built on a foundation of steady progress on gender balance, Telenor is expanding the current approach and deepening the commitment towards diversity and inclusion. This is supported by clear ambitions towards 2020, to build a culture that embraces and respects multiple viewpoints, mirroring Telenor's current and future customer base worldwide.

More information at www.telenor.com/career/diversity-inclusion.

Health, safety and people security

Telenor shall promote high standards within health, safety and people security (HS&S) in order to ensure a healthy, safe and secure working environment. A healthy and sustainable work-life balance will be an integral part of Telenor's HS&S focus. Telenor's ambition is zero injuries to its employees and suppliers. To achieve this Telenor is committed to be safe and responsible. This applies to everyone working for Telenor.

Telenor is committed to work on HS&S in accordance with ISO45001, to learn from experience, and to continuously improve by identifying and managing HS&S risks in its operations, increasing HS&S awareness, preventing incidents and providing healthy, safe and secure working environments.

Status and ambition

In 2019, five fatal incidents were reported in Telenor's supply chain in Pakistan and Bangladesh operations. The majority of

these were related to road transportation. Overall, a decrease of fatalities during the last five years has been observed. Telenor has experienced a steady decrease in lost time injury frequency (LTIF) among employees, from 0.22 in 2018 to 0.17 in 2019, although man-hours also decreased during the same period.

The majority of lost time injuries involving employees are related to road transportation. In Asia, road transportation remains a challenge, and is Telenor's highest HS&S risk. In 2019, road safety awareness and initiatives have been implemented where risk exists. Telenor monitors the COVID-19 outbreak closely and will continue taking measures to minimise the impact on health and safety as well as ensuring business continuity.

In 2019, the Sickness Absence Rate (SAR) for Telenor Group increased slightly to 1.85, compared to 1.82 in 2018. The SAR continues to be lower in Asian countries and higher in Scandinavian countries. There are variations in reported data based on different local and national procedures and regulations related to sickness reporting.

In 2019, Telenor began group-wide ISO 45001 framework adoption, and business units Telenor Pakistan and Digi have been ISO 45001 certified. Telenor is continuously working on improving systematic learning process from incidents, and has started reporting on a KPI that measures its ability to report and follow up incidents.

LOOKING AHEAD: In 2020 Telenor will continue to implement Group ISO 45001 framework, risk assessment and investigation training. The global digital HS&S incident reporting system will be implemented, and continued focus will remain on road transportation by raising awareness and identifying activities to mitigate this risk further. Moreover, health and wellbeing programmes will continue to be implemented.

More information at www.telenor.com/sustainability/responsible-business/labour-rights-and-standards/health-safety-and-security.

Supply chain risk management Policy and actions

Supply chain risk management continues to be high on Telenor's materiality assessment, and is key for long-term business success. Through the Agreement for Responsible Business Conduct (ABC), Telenor's Supplier Conduct Principles (SCP) are applicable for most supplier categories and contracts (based on risk assessments). The SCP are based on internationally recognised standards, including requirements on the respect for human rights, health and safety, labour rights, working conditions, conflict and other unsustainably mined minerals, environment, privacy and freedom of expression, and prohibited business practices.

Telenor's approach to supply chain sustainability starts with a contractual obligation for the supplier to uphold responsible business practices, monitor compliance with Telenor's requirements, and build capacity on these topics within the supply chain. All suppliers are obliged to extend the supplier requirements to their own supplier base to help ensure that the requirements are implemented throughout the supply chain. Telenor believes that partnership and cooperation with suppliers and industry peers is vital to achieving a responsible global supply chain.

Status and ambition

KEY SUPPLY CHAIN RISKS: Telenor's key risks in the supply chain continue to be health and safety issues such as road accidents, risks related to working at heights, other working condition deficits related to hours and wages, existence of underage labour, and risks to business ethics. The majority of these risks are in Telenor's operations in Asia.

CHILD LABOUR/UNDERAGE LABOUR:

During 2019, Telenor recorded and addressed seven cases of underage labour (15–18 years involving hazardous work). There have been no incidents of child labour (12–14 years) identified in our supply chain since 2017.

OTHER POTENTIAL RISKS: Use of conflict minerals is an indirect risk area for Telenor, and the company monitors that suppliers have a written policy and procedures in place to avoid knowingly acquiring conflict minerals. Based on recent years' global audits conducted through the Joint Audit cooperation (JAC), an association of telecom operators, there have been no specific issues highlighted with any of the major suppliers of smartphones and tablets.

Modern slavery is also a potential risk in Telenor's supply chain, especially related to payment of wages and working hours. Telenor actively monitors suppliers to ensure they do not employ or use any form of forced, bonded or compulsory labour, and that they strictly prohibit any form of slavery or human trafficking.

CAPACITY BUILDING: Telenor's business units conducted close to 25,000 hours of capacity building on topics related to the

SCP throughout 2019. These efforts involved building awareness and capacity to drive continuous improvement. The activities vary between suppliers and regions, depending on the most relevant and salient risks in the scope of work towards Telenor.

MONITORING COMPLIANCE: Telenor carries out site inspections at supplier premises and operational sites in all its markets to monitor compliance with the SCP requirements. In 2019, Telenor carried out 3,616 supplier inspections across the Group. 86 per cent of these inspections were unannounced. These inspections resulted in 650 major non-conformities, which were followed up with mitigation plans and further monitoring. 81 per cent of these non-conformities were resolved and closed by yearend.

Through participation in the JAC, Telenor also had access to 104 audit reports conducted in the global supply chain in 2019.

LOOKING AHEAD: Effective risk management in Telenor's supply chain will remain a priority in 2020. Telenor will continue to strive for its supply chain sustainability efforts to have a positive impact on the business as a whole, and in

In 2019, Telenor carried out more than 3,600 supplier inspections across the Group. 86 per cent of these inspections were unannounced.



the societies in which it operates.

More information at www.telenor.com/sustainability/responsible-business/supply-chain-sustainability.

Human rights impact

Policy and actions

Telenor is committed to respecting and supporting human rights in accordance with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Declaration on the Fundamental Principles and Rights at Work.

Telenor applies an ongoing process of human rights due diligence, both at Group- and business unit levels, to identify, address and manage human rights-related risks and impacts resulting from Telenor's own activities and those in its value chains.

Grievances are reported through Telenor's Integrity Hotline. See chapter Code of Conduct for more information on the process of handling reports.

Telenor is committed to being transparent on challenges and company practices to the extent possible through its annual reporting, issue-specific reporting (including the annual Authority Request Disclosure Report), and through other sustainability updates, presentations and forums.

Telenor engages with a number of organisations to advance its human rights objectives, including the UN Global Compact, the Global Network Initiative, GSMA, the Joint Audit Cooperation (JAC) and Global Union.

Status and ambition

Telenor has communicated its human rights efforts and challenges on various public platforms in 2019, including on its own website, the UN's Special Procedures website, the Business and Human Rights Resource Centre, and at the 8th UN Forum on Business and Human Rights.

DUE DILIGENCE: In mid 2019, Telenor conducted a Group-level human rights due diligence. The process identified Telenor's most salient group-wide human rights risks: ensuring the right to privacy and freedom of expression, compliance with labour standards in the supply chain, ensuring online safety, preventing discrimination, and respecting land rights. Mitigating actions such as training and capacity building are in place for several of these risks, and Telenor is assessing how to strengthen these efforts and address gaps.

MYANMAR: 2019 continued to be a challenging year with respect to human rights in some of Telenor's markets. The Rohingya situation in Northern Myanmar and the refugee camps in Bangladesh, including how Telenor can ensure connectivity in those areas, is of grave concern. In August 2019, the Independent Fact Finding Mission on Myanmar published a report urging the international community to sever ties with Myanmar's military and any companies it controls and relies on. The report is a clear indication of the continued importance for Telenor to carry out due diligence on an ongoing basis – both in Telenor's own processes as well as those in the supply chain. This is to ensure that the company is not complicit in human rights abuses or adverse impacts. Telenor also continues to engage in dialogue with authorities and other stakeholders at local and international levels.

More information at www.telenor.com/sustainability/responsible-business/human-rights/mitigate/human-rights-in-myanmar.

GLOBAL NETWORK INITIATIVE: In 2019, Telenor continued to engage with the multi-stakeholder Global Network Initiative (GNI) to address challenges related to authority requests that may limit privacy and/or freedom of expression. In 2019 it underwent its first GNI Independent Assessment by an

external assessor. Following a detailed review of the assessment by the multi-stakeholder GNI Board, it determined that Telenor is making good-faith efforts to implement the GNI Principles with improvement over time. Telenor will issue a public report following the release of the formal GNI report on the 2019 assessments in 2020.

ACKNOWLEDGEMENT: In 2019, Telenor ranked among the top companies within the European telecommunications and technology industry in the Global Child Forum's Benchmark Study on children's rights and business. Additionally, The Economist & ECPAT Country Overview Briefing Paper on Sexual Exploitation of Children in Malaysia has acknowledged Digi for their efforts in limiting online child sexual abuse and safety in general. Telenor also ranked fourth out of 12 telecommunications companies in the global 2019 Ranking Digital Rights (RDR) Corporate Accountability Index.

LOOKING AHEAD: Building on the work initiated in 2019, Telenor will continue its efforts to integrate human rights considerations throughout the company, through, inter alia, training and capacity building of staff across functions and business units. Telenor will also continue to prioritise multi-stakeholder efforts, including the GNI, take an active role in public policy discussions related to business and human rights, both nationally and internationally, and continue to strengthen transparency and stakeholder engagement efforts.

More information at www.telenor.com/sustainability/responsible-business/human-rights/mitigate.

Customer privacy

Policy and actions

Customers expect not only real-time, relevant and individualised services, they also expect that their privacy is safe-guarded. As a provider of mobile and internet connectivity, respect for 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 from a security angle, with policies and manuals that set out mandatory requirements applicable across all operations.

Telenor recognises that while telecommunications generally contributes 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 the risks of unlawful and disproportionate restrictions on privacy and freedom of expression, to the extent that the company can.

Although national requirements vary throughout Telenor's markets, 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.

With the enforcement of GDPR in 2018, and gradual introduction and revision of privacy-related laws in Asian markets, privacy has become a more prominent issue in both broader society and in Telenor. In 2015, Telenor established 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.

Status and ambition

In 2019, Telenor moved its centralised privacy unit under the compliance function in the Group. The privacy unit will focus on privacy oversight across the Group, in addition to supporting the Data Protection Officers (DPO) of the business units in monitoring and acting on privacy risks, ensuring effective internal controls for privacy are in place across Telenor.

Telenor Norway launched a new service in 2019 that helps subscribers delete their own personal data disclosed on the Internet.

AUTHORITY REQUESTS: In 2019, Telenor continued to prioritise transparency to mitigate potential human rights abuse by authorities, including by publishing the Authority Request Disclosure Report of 2018. As described in the human rights chapter, Telenor has actively engaged in the Global Network Initiative (GNI) on freedom of expression and privacy, as well as bilaterally with a range of stakeholders, as part of Telenor's collaborative effort to protect and advance freedom of expression and privacy.

LOOKING AHEAD: It is expected that governments and regulators across Telenor's markets will continue to strengthen privacy and national security regulations, and introduce new measures that directly or indirectly affect Telenor's ability to manage customer data. Telenor will continue to comply with regulatory requirements and meet the expectations of its customers.

In 2020, Telenor will prioritise the following areas: efficient oversight and risk management of privacy across Telenor, strengthened responsiveness to data breaches, and further embedding privacy into business operations.

More information at www.telenor.com/sustainability/responsible-business/privacy-and-data-protection.

Cybersecurity Policy and actions

The global nature of Telenor's business and role as a provider of critical infrastructure means that it is at a constant risk of basic and advanced cyber threats, with cyber-attacks being one of the top enterprise risks. Telenor strives to always protect society and people in their digital lives. The key focus is to professionalise security across

Telenor, and manage security risks according to industry best practices, local laws, and regulations. Telenor has established a global security organisation with a global way of work driving the security agenda, supported by global security capabilities and governed by joint meeting places and arenas

Telenor is bolstering its global capabilities for security monitoring and incident response, and the business units are conducting security uplifts in legacy environments and migrating to new infrastructure. The purpose is to implement best practice security controls in an infrastructure that enables efficient threat mitigation and incident response. Furthermore, it enables Telenor to apply a vendor-agnostic approach.

Status and ambition

FROM STRATEGY TO EXECUTION: During 2019, Telenor brought security from strategy to execution in the business units at an operational level, demonstrating measurable impact in every business unit. Telenor has systematically strengthened its basic security posture in terms of people and competency, processes, technology, and vendor management. Telenor Group Policy Security is regularly updated in order to maintain strong governance.

THIRD PARTY RISKS: During 2019, Telenor has strengthened the focus on third-party risk with a framework for strategic vendor management, established a cross-functional working group to address third-party risks, and security risk assessments have been performed in the business units.

EXTERNAL COLLABORATION: Telenor has actively contributed to several security arenas, such as the GSMA Fraud and Security Group, GSMA Fraud and Security Advisory Panel, ISF (Council Member), Europol EC3 (Advisory Board Member), ETNO (European Telecommunications Network Operators Association), ETSI (European Telecommunications

Standards Institute) and FIRST (Forum of Incident Response and Security Teams). Telenor is also a signatory to the Paris Call for Trust and Security in Cyberspace.

CYBER ATTACKS: In 2019, the two largest categories of threats detected by Telenor's global security operations centre were ransomware, trojans, and other malware such as coinware. In 2019, more than 80 per cent decrease was observed in detected basic security incidents, which demonstrates increased security in the business units.

However, advanced cyber-attacks targeting business information, customer data and critical infrastructure continue to pose a significant risk, partly due to the difficulty in detecting such attacks. While Telenor has been successfully developing the capability to detect a wide number of threats globally, the process of establishing advanced levels of security is lengthy, requiring substantial changes in terms of competency, processes, technology and vendor management.

Telenor recognises the importance of collaboration and is working to establish a close dialogue with the authorities in all markets. Telenor shares experience and threat intelligence with the industry through established forums. Telenor Norway annually publishes a public security report, Digital Sikkerhet (www.telenor.no/om/digital-sikkerhet), and Telenor Security Operations Center (TSOC) regularly publishes information about detected incidents and cyber threat trends on the blog telenorsoc.blogspot.com.

LOOKING AHEAD: Going into 2020, Telenor will continue to strengthen local and global capabilities protecting critical assets, customer data and confidential business information, with a focus on detecting and responding to security incidents. Furthermore, Telenor will strengthen internal security culture and competency among all employees, and

continue to integrate security into strategic programmes and projects, striving to have security at the foundation of everything Telenor does.

More information at www.telenor.com/about-us/corporate-governance/cyber-security.

Climate impact and environmental management

Policy and actions

Climate change is one of the greatest challenges facing people, businesses and governments.

Telenor's group-wide policy states that the business units shall make all reasonable efforts to minimise use of resources including energy, water and raw materials as well as seek to minimise carbon emissions from all parts of the operations. Further, the business units shall secure environmental management including sustainable waste management where all electronic waste shall be reused, recycled or safely disposed.

The mobile 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 has over the years followed up potential business initiatives and partnerships offering eco efficient solutions

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 Telenor business units are mandated to secure sustainable waste management. All electronic waste is to be reused or recycled according to internationally recognised standards and regulations.

Status and ambition

CLIMATE RISKS: For Telenor, climate-related physical risks include potential damage to vital infrastructure and utilities through the impact of more extreme weather events and rising sea levels. Climate-related regulatory risks include potential higher operational costs due to increasing carbon taxes and energy/fuel taxes, as well as risks of higher capital costs due to a required transition towards the use of renewable energy solutions.

By year end 2019, Telenor has installed solar energy solutions for close to 3,000 of its base stations in Asia.



ENERGY CONSUMPTION: In 2019, Telenor's total energy consumption was approximately 3,340 GWh – an increase of 9 per cent compared to recalculated data from 2018 – despite a 51 per cent increase in data traffic on Telenor's mobile network to approximately 5,500 petabytes in 2019.

CO₂ EMISSIONS: The associated emissions of greenhouse gases in 2019 for Telenor Group has 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, an increase of 9 per cent compared to recalculated data from 2018. The operations in Asia account for 96 per cent of the CO₂ emissions, of which 80 per cent is related to grid electricity, while the remaining 16 per cent stems from diesel generators. Nordic operations account for 4 per cent of the Group's CO₂ emissions (including fuel from car fleet, electricity purchases and business flights). In 2019, Telenor's carbon emissions were 5.9 kg CO₂ per customer per year, an increase of 1 per cent from 2018.

Further, Telenor Group's total GHG emissions in 2019 was close to 1.2 million tonnes of CO₂ when using market-based electricity emission factors for indirect scope 2 emissions, an increase of 1 per cent compared to the recalculated data from 2018. 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.

RENEWABLE ENERGY SOLUTIONS: By year end 2019, Telenor has installed solar energy solutions for close to 3,000 of its base stations in Asia, an increase from 2,500 solar-based sites by year end 2018.

LOW CARBON SOLUTIONS: In 2019, Telenor Group passed more than 15.7 million SIM-connected devices globally on its IoT platforms, an increase from 13

million IoT SIMs in 2018. Telenor Connexion, Telenor's dedicated IoT company, designs and operates IoT solutions for the global market that can enable smart services with potential to cut global carbon emissions.

ENVIRONMENTAL MANAGEMENT: In 2019, more than 72 per cent of Telenor's procurement processes with a contract value greater than 250,000 USD used a specified set of environmental criteria such as hazardous substance handling and energy efficiency. In 2019, mobile handset recycling continued in Telenor's business units, and more than 227,000 mobile handsets and batteries were collected and recycled. During 2019, Telenor's business units reported close to 3,900 tonnes of obsolete electrical and electronic equipment waste (e-waste) removed from active operations, of which 99 per cent was reused or recycled in an environmentally-sound manner.

LOOKING AHEAD: Telenor will continue to mitigate climate-related physical risks by ensuring robust infrastructure and safeguarding in its operations. Telenor will be driving a climate agenda that contributes to its position as a trusted brand, with a key focus on responsible business conduct and value creation. Telenor's climate ambitions should help set a long-term direction towards group-wide carbon neutral business operations in 2050, and should contribute to low-carbon economies, in line with the Paris Agreement. In 2020, Telenor will disclose more climate-related risks information in line with the TCFD's recommendations.

Telenor's climate targets towards 2030 are based on the new mobile sector-specific decarbonisation pathway approved by the Scientific Based Targets initiative (SBTi). The new climate ambitions towards 2030 will allow Telenor to support the ambitious Paris Agreement goal of limiting global warming to 1.5°C, designed to substantially reduce the risks and effects of climate change:

Telenor's ambition for Nordic markets is to have carbon-neutral business operations by 2030, focusing on energy efficiency measures in network operations, purchasing renewable electricity, enabling carbon neutral transport (including its supply chain), and offsetting business flights.

Telenor's ambitions for Asian operations is 50 per cent reduction in carbon emissions by 2030, focusing on substituting diesel generators with solar solutions at base stations and exploring other renewable electricity options in the region.

In the coming period, we expect to see significant growth in data traffic that will increase energy consumption as well as emissions due to limited access to renewable energy, especially in the Asian region. Reaching our target will require very close follow up and implementation of energy efficiency measure in close cooperation with our vendors and partners.

More information at www.telenor.com/sustainability/responsible-business/environment-and-climate.

Digital inclusion

Mobile connectivity and Internet access are catalysts for growth. Exclusion can have a negative effect, particularly on the ability of vulnerable groups to earn a living, increase income or improve their way of life. As children and young people increasingly explore and benefit from the digital world, the need to build their capacity and resilience to navigate safely remains ever important. Ensuring access and skills that help safely capture digital opportunities of the future, is therefore an important part of Telenor's commitment to reduce inequalities and empower societies.

CHILD ONLINE SAFETY: In pursuit of the ambition to train four million children in online safety by 2020, Telenor business units reached out to approximately 1.2

million children in 2019, cumulatively training a total of approximately 3.3 million children. This was achieved through collaboration with Telenor's Global Sustainability Partners, UNICEF and Plan International, local organisations and government agencies. In October 2019, Telenor participated in the first ASEAN Stop Cyberbullying Workshop to lobby for online safety integration in national curricula. Moreover, nearly all Telenor Asian business units adopted Telenor's Digiworld online safety resources.

In 2019, all business units undertook online safety training with a locally relevant approach. Efforts included outreach programmes, awareness campaigns, and capacity building of parents and teachers. Telenor Myanmar partnered with Plan International, the government and local partners to promote digital literacy and online safety, with an aim to reach 740,000 by the end of 2020. Another project to scale child online protection in Bangladesh was launched by Grameenphone and UNICEF. The goal is to build skills for 1.2 million children and youth by 2020. In 2019 alone, Grameenphone trained almost 600,000 children, created awareness for more than 200,000 parents, guardians and teachers, and reached 13 million through a national awareness campaign.

In Malaysia, Digi continued to build its safe internet capacity building programme, and together with UNICEF and partners, ran a national awareness campaign against cyberbullying. Telenor Norway, together with partners, launched an interactive digitised version of Bruk Hue (Use your Head) programme to prevent cyberbullying, while the service Nettslett – offering psycho-judicial support related to online harm – was integrated in the subscriptions of 600,000 customers. Telenor Denmark also utilised digital channels to create awareness and outreach for its #DigitalPænt programme.

SMART FARMING: Through the Smart Farmer project, dtac continues to empower smallholder farmers in Thailand with access to advanced technology and skills. In 2019, nearly 400 farmers were trained in online marketing, and the use of IoT and plot-specific weather forecast helped farmers increase crop yields and margin. An assessment in 2019 suggested that farmers perceived advanced technology well and were willing to invest to elevate farming capacity.

In Pakistan, Khushaal Zamindar, which is an Interactive Voice Response, outbound dialling and SMS-based information service, reached 7.5 million monthly active users to serve farmers, including women, through Khushaal Aangan health and agri info. The portfolio was expanded to include medical consultation, veterinary service, health insurance, crop insurance and personalised consultation for crops.

DIVERSITY AND INCLUSION: In May 2019, Telenor Norway and PLAN International launched the Girls Create Tech Academy – a mentorship programme to reduce the digital gender gap in Norway, inspire more girls to choose education and challenge gender stereotypes in careers within technology. Thirty mentees under the guidance of female Telenor Norway employees are part of the one-year programme.

To mark the International Day of the Girl on 11 October, Telenor participated in Plan International's '#GirlsTakeOver' initiative, where aspiring young girls took over the positions of Telenor leaders in several markets as a symbolic gesture to encourage equal opportunities for girls.

In August 2019, Telenor, in partnership with Plan International, launched the study 'PROGRAMMED OUT: The Gender Gap in Technology in Scandinavia'. This report reflects on reinforced gender roles and other barriers to women in Scandinavia with career ambitions in

tech, and offers recommendations for the industry.

Leveraging the power of technology to advance inclusion for Persons with Disabilities (PWDs), Telenor Pakistan is piloting a Digital Job Portal aimed at providing livelihood and skills development opportunities to PWDs. Digi's Yellow Heart is also providing differentiated offerings and rebates for seniors and PWDs to lower barriers of adopting a digital lifestyle.

Social innovation

Mobile connectivity and digital services have the potential to advance all UN SDGs through solutions that can address social, economic and environmental problems. In addition, research is instrumental in gaining insights and competencies to help connect customers to what matters most. Telenor continues to strengthen its efforts to leverage mobile for sustainable development, reduce inequalities and empower societies.

DIGITAL BIRTH REGISTRATION: According to UNICEF, globally one in four children under five years old remain unregistered at birth, and are consequently at risk of being denied healthcare, education and social protection against child labour and early marriage. In Pakistan and Myanmar, Telenor is working with the governments and UNICEF to digitally register births efficiently, and with scale.

In October 2019, Telenor Myanmar in collaboration with UNICEF implemented the Mobile Birth and Death Registration app in Mon State. The app will allow health workers to free up time lost in manual data entry and duplication, making the birth certificate issuance process more efficient.

By 2019, the Digital Birth Registration project in Pakistan registered 780,000 children in five districts. It is not expected that Telenor and partners will reach the ambition of 7 million digital birth

registrations by 2020. This is due to challenges including training capacity of users, network availability in government-selected areas, approval process, and delays in improved solution rollout. It is expected that Telenor will reach 2 million birth registrations by year end 2020.

FINANCIAL INCLUSION: In Myanmar, Wave Money, with its large financial services distribution network, continues to drive financial inclusion. In 2019, Wave Money continued to facilitate humanitarian aid disbursements for World Food Program (WFP) and settlement of pensions via mobile money together with Myanma Economic Bank (MEB). In July 2019, Gpay—a mobile financial services solution by Grameenphone—was repositioned and simplified to facilitate financial inclusion for women and rural communities. This is being achieved through a partnership with Rural Electrification Board (REB) of Bangladesh. By year end, the effort has created a customer base of two million, of which 18 per cent are women. In Pakistan, Easypaisa, the country's first mobile banking platform, introduced Enable Pay & Credit for the masses, digitising the payment value chain between distributors and retailers, and enabling easy access to credit. More than 13,000 merchants benefitted from the service in 2019.

USING BIG DATA AGAINST DRUG-RESISTANT MALARIA: Drug resistance poses one of the greatest threats to malaria control, and results in increased morbidity and mortality. With an ambition to support local authorities to track and contain this emerging health threat, a research report was published in collaboration with Harvard T. H. Chan School of Public Health, Grameenphone, Telenor and other partners titled 'Mapping Imported Malaria in Bangladesh Using Parasite Genetic and Human Mobility Data'. The study, one of the largest efforts of its kind, shows that combining malaria genetic data with

The foundation for Telenor's strategy is its purpose: Connecting you to what matters most – empowering societies.



human mobility data from mobile networks can help map and predict the spread of drug-resistant malaria.

Safe use of mobile communications

Mobile communications are delivered via radio frequency signals that are electromagnetic fields (EMF). Radio base stations are the essential part of the infrastructure for transmitting and receiving those signals, and the base stations need to be located where people use their mobile devices.

Over many years, there has been certain public and stakeholder interest in human health issues related to EMF. With 5G, Internet of Things (IoT) and wearable devices, an increasing public interest in EMF is expected, with potential regulatory issues for the mobile industry, and business-limiting consequences for Telenor operations.

Throughout Telenor, all business units work strictly in accordance with the guidelines provided by national regulations and the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines are endorsed by the World Health Organisation (WHO) and represent the basis for all of Telenor's planning,

installation work and safety measures at antenna sites.

More information at www.telenor.com/sustainability/responsible-business/safe-services/mobile-phones-and-health.

HOW TELENOR IMPACTS SOCIETIES

In Asia and Europe, Telenor contributes to society in a number of ways. Digitalisation allows countries to leapfrog stages of economic development. Digital processes allow most industries to produce more effectively with less physical strain. Digital services empower government services and information to reach citizens, and digital systems represent a frontline of democracy, security and defence.

Telenor's social agendas address and enforce these contributions: Telenor pursues a network rollout model that brings Internet to all. Telenor believes that digital services have the potential to reduce inequalities (UN Sustainable Development Goal #10) by providing the poorest with low-cost access to information and economic opportunities. Telenor's deliberate policy of sustainable value chains and local procurement

enforces decent work and economic growth. Telenor communicates a value proposition of good governance between competent tax authorities and responsible taxpayers.

Tax position

Telenor aspires to be a trusted company, recognised for strong business ethics. Telenor's ambition is to contribute to economic, environmental and social development in countries where the company is present, acting with accountability and transparency. Telenor understands the importance of taxes to support this development, and takes a responsible approach respecting its obligations as a taxpayer.

Telenor recognises the sovereign right of all states to amend existing or introduce

new tax legislation, and Telenor supports a stable and transparent fiscal environment based on universal tax principles, founded on predictable legislation applied by objective authority, and tested by independent court systems. Telenor aims to constructively engage in dialogue with relevant authorities on tax legislation.

Telenor supports initiatives to improve international transparency in taxation matters, including OECD measures for country-by-country reporting and automatic exchange of information. Since 2014, Telenor has communicated a sincere commitment to corporate responsibility by voluntarily reporting country-by-country income and tax contributions.

More information on Telenor's tax policy at www.telenor.com/media/public-policy/a-fiscal-environment-for-digital-inclusion-and-economic-growth-through-fiscal-stability.

Economic contribution to society

Telenor is a long-term owner, employer and taxpayer. Telenor supports efficient use of radio spectrum resources for the increasing demands for mobile broadband capacity. Telenor employs local vendors for network rollout and civil works, or alternatively buy network capacity from local tower companies.

In 2019, Telenor was actively engaged in business start-up incubation and acceleration, not least through the Artificial Intelligence Lab in Norway, and 5G development efforts with partners

DIRECT VALUE CREATION

The table specifies the direct Gross Value Added of Telenor in five Asian countries. Frontier Economics: "The Mobile effect: How Connectivity Enables Growth", Nov 2019.

Million USD ¹⁾	Telenor - direct gross value added (GVA)				
	Pakistan Telenor	Bangladesh Grameenphone	Myanmar Telenor	Thailand DTAC	Malaysia Digi
2014	565	877	331	1276	1244
2016	721	1078	406	1033	913
2018	695	1272	314	846	933

¹⁾ Numbers are unadjusted for depreciation or inflation

COUNTRY-BY-COUNTRY REPORTING¹⁾

Financial Year 2019

NOK in millions	Revenues	EBITDA	Capex (incl. licenses & spectrum)	Profit before taxes	Corporate income tax (CIT) paid	Headcount (FTEs) per 31.12.2019
Norway	28 658.0	11 199.9	6 495.6	4 110.4	3 701.8	4 350
Sweden	12 857.0	5 289.3	1 815.7	3 070.9	563.6	1 812
Denmark	4 871.3	1 390.7	516.6	535.9	80.8	1 215
Finland	3 434.4	1 020.0	879.5	167.5	13.3	1 512
Pakistan	6 033.1	3 125.3	2 416.2	53.0	232.5	1 812
Bangladesh	14 980.2	9 377.6	1 901.6	6 456.5	3 144.4	2 303
Myanmar	5 759.2	3 363.9	884.4	547.4	(28.7)	798
Thailand	22 994.6	8 811.8	4 210.3	2 751.5	213.6	3 945
Malaysia	13 517.6	7 250.5	2 116.5	4 343.3	981.4	1 844
Telenor Group	113 665.9	50 276.0	21 359.0	20 968.5	9 032.7	20 044

¹⁾ This table specifies the most important elements of Telenor's direct economic contribution country-by-country. It includes Telenor's revenues, EBITDA, capital expenditure including licenses and spectrum, the corporate income taxes paid in 2019 and the number of employees. The table does not specify all taxes and fiscal levies – only Corporate Income Tax (CIT) is included.

and authorities in Thailand and Malaysia. A private-public 5G Lab was launched in Malaysia in 2019. In Bangladesh, Telenor and the industry advocate the introduction of 5G development in dialogue with authorities.

Existing public policy positions on mobile spectrum management, 5G, taxation, net neutrality, and free flow of data, were supplemented in 2019 by a new policy position on e-SIM.

In 2019, Telenor's investments, excluding licences and spectrum, amounted to NOK 17.4 billion (16.7 billion in 2018), from a total revenue of NOK 113.7 billion (105.9 billion), with a resulting investment ratio of 15.3 per cent (15.8 per cent).

Telenor is among the top foreign investors in all its Asian markets. In 2019, Frontier Economics published a study that quantified Telenor's direct and indirect value creation in five Asian markets. Direct value added was estimated along global national accounting conventions.

Frontier Economics estimated that Telenor's local companies generated direct value added in Asia at 4.1 billion USD. Since 2014, value creation in Asia has fluctuated not least by the effect of volatile currency depreciation. Taking account of currency depreciation, Telenor's value creation is still increasing in Pakistan and Bangladesh, but stagnant in saturated markets such as Thailand and Malaysia. In mature Asian markets and the Nordics, Telenor takes great effort to improve further economic value creation by opening up the opportunities in 5G, the Internet of Things, Artificial Intelligence, and other advanced digital services.

Frontier Economics has estimated that the value creation in 2018 per Telenor employee in the five Asian countries was on average 367,719 USD, or forty times higher than the national average of 9,270 USD per employee. With above average labour productivity, Telenor and

the telecommunications industry drive high-skilled job creation, domestic spending power, and national economic growth. In Telenor's five Asian markets, the mobile industry created skills and wage opportunities for 132,750 employees in 2018.

Other than Telenor's direct economic contribution as measured in the table above, the company also stimulates increased value creation in other companies and sectors by investing in infrastructure, buying local goods and services, and raising their productivity via digitalisation. In Telenor's five Asian markets, highly digital sectors have increased their value creation between 6 and 12 per cent per year since 2005, and expanded to now represent 65–75 per cent of all economic activity. By growing considerably faster than other sectors, highly digital companies give specific and substantial extra growth stimulus.

More information on the study from Frontier Economics at www.telenor.com/sustainability/frontier-economics-report.

After almost a decade of Corporate Income Tax (CIT) rate reductions in Europe and Asia, there were no notable changes in 2019. Apart from direct taxes

on profits and revenues, Telenor also pays substantial regulatory fees and indirect taxes on products and services, such as Value Added Tax (VAT), General Sales Tax (GST), customs duties, service taxes, Revenue Sharing, etc.

HOW TELENOR HELPS EMPOWER SOCIETIES: SDG IMPACT

An assessment of how Telenor impacts the United Nations Sustainable Development Goals (SDGs) can be found at www.telenor.com/wp-content/uploads/2020/03/Telenor-SDG-Impact-Assessment-2019.pdf. Building on the first impact assessment in 2018, this year Telenor has also taken into consideration the risks from business activities, which has helped paint a broader picture of areas of SDG impact.

In 2019 SDG impact assessment report, Telenor has also taken into consideration the risks from business activities, which has helped paint a broader picture of areas of SDG impact.



ESG METRICS

Analytical tool

An overview of Telenor's historic sustainability performance is available by downloading the Telenor Group Sustainability Performance Analytical tool, where figures are separated per business unit, and covers the period from 2012 to 2019, at www.telenor.com/sustainability/reporting/key-figures/#analytical-tool. The table below shows a synopsis of key metrics from 2017 to 2019.

GRI index

Telenor reports its sustainability performance in accordance with the Consolidated Set of GRI Sustainability Reporting Standards. These standards incorporate the key concepts and disclosures from GRI G4 guidelines with a new and improved structure and format. The standards are issued by the Global Sustainability Standards Board (GSSB),

and Telenor uses them to report publicly on its impacts on the economy, the environment and society. GRI represents a universally-applicable, comparable framework which facilitates transparency and accountability.

Telenor's GRI index can be found at www.telenor.com/sustainability/reporting/gri-index.

Verification statement

DNV GL has been commissioned by Telenor to carry out an independent review of the Sustainability Report 2019, in particular to assess the accuracy of non-financial claims. The engagement has been undertaken in accordance with the requirements in the ISAE 3000 standard, as well as DNV GL's general method for assessments of sustainability reporting.

More information at www.telenor.com/sustainability/reporting/our-performance.

TELENOR GROUP – NON-FINANCIAL KEY FIGURES

	2017	2018	2019
People & Organisation			
Women in total workforce (%)	36	37	37
Women in management positions (%)	26	28	30
Health, Safety & Security			
Fatalities – employees	0	0	0
Lost Time Injury Frequency (LTIF)	0.23	0.22	0.17
Sickness Absence Rate (full year average)	1.84	1.82	1.85
Supply Chain Sustainability			
Capacity building of suppliers (man-hours)	23 660	20 028	24 986
Sustainability inspections and audits	5 000	3 515	3 616
Fatalities in the supply chain – including tiers below tier 1	7	4	5
Climate Change			
Total carbon emissions (thousand tonnes CO ₂)	1 065	1 013	1 080
Direct carbon emissions/Scope 1 (thousand tonnes CO ₂)	225	219	209
Indirect carbon emissions /Scope 2 (thousand tonnes CO ₂)	819	777	852
Other indirect carbon emissions/Scope 3 (thousand tonnes CO ₂)	21	17	18
Total energy use (GWh)	3 183	3 061	3 340
Carbon emissions per mobile data traffic (tonnes CO ₂ / petabyte)	408	277	196
Environment			
Customer mobile phones and batteries collected for recycling or reuse	168 000	315 000	227 000
Municipal waste recycled (%)	40	49	55
Electronic waste recycled/reused (%)	97	86	99



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