



telenor  
group

# GRI INDEX REPORT 2020



# Telenor Group Report 2020

## GRI Sustainability Reporting Standards

'In accordance – Core'



### Preface

Telenor Group supports the Global Reporting Initiative (GRI) – as an Organisational Stakeholder – and its initiatives to drive sustainability reporting. Telenor Group reports – and has done so since 2002 – in accordance with the GRI Sustainability Reporting Guidelines. The 2020 report applies the GRI Sustainability Reporting Standards.

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

During 2020, Telenor Group has carried out an updated assessment of sustainability issues aligned with the Consolidated Set of GRI Sustainability Reporting Standards. The assessment was conducted in accordance with the GRI 101 Foundation principles for defining report content through the following key steps: identification, prioritisation, and validation. The materiality process is regularly revised through internal workshops and meetings within Telenor to adapt for changes in context, risk, and stakeholder feedback. More details on the materiality assessment process can be found [here](#).

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

#### External Assurance

An independent [assurance](#) of the content of the Sustainability report 2020 has been done by DNV Business Assurance.

#### References in the column UN Global Compact

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

SDG 1-17: Sustainable Development Goals

## TELENOR GRI INDEX REPORT 2020

GRI standard	Standard disclosure	Telenor response	UN Global Compact
GRI 101 Foundation 2016	GRI 101 does not include any disclosures		
GRI 102 General Disclosures 2016			
<b>1. ORGANIZATIONAL PROFILE</b>			
102-1	Name of the organization	Telenor Group	
102-2	Activities, brands, products, and services	<a href="http://www.telenor.com/about-us/global-presence/">http://www.telenor.com/about-us/global-presence/</a>	
102-3	Location of headquarters	Fornebu, Norway	
102-4	Location of operations	<a href="#">Telenor Annual Report 2020-Segment information</a> -p.103 and <a href="http://www.telenor.com/about-us/global-presence/">http://www.telenor.com/about-us/global-presence/</a>	
102-5	Ownership and legal form	<a href="http://www.telenor.com/about-us/corporate-governance/articles-of-association/">http://www.telenor.com/about-us/corporate-governance/articles-of-association/</a>	
102-6	Markets served	<a href="#">Telenor Annual Report 2020-Segment information</a> -p.103 and <a href="http://www.telenor.com/about-us/global-presence/">http://www.telenor.com/about-us/global-presence/</a>	
102-7	Scale of the organization	<a href="#">Telenor Annual Report 2020 – BoD report</a> – p.10 – 12 and p. 27-35	
102-8	Information on employees and other workers	<a href="#">Telenor Annual Report 2020</a> p. 16 and p. 75-76 and <a href="http://www.telenor.com/sustainability/reporting/key-figures/#people-organisation">http://www.telenor.com/sustainability/reporting/key-figures/#people-organisation</a>	
102-9	Supply chain	<a href="#">Telenor Annual Report 2020</a> p. 22, p.80-81 and also outlined online: <a href="http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/">http://www.telenor.com/sustainability/responsible-business/supply-chain-sustainability/</a>	
102-10	Significant changes to the organization and its supply chain	<a href="#">Telenor Annual Report 2020-Segment information</a> -p.103 and <a href="#">Telenor Annual Report 2020 – BoD report</a> p.19-22 and <a href="#">Telenor Annual Report 2020</a> - p.128; Acquisitions and disposals	
102-11	Precautionary Principle or approach	<a href="#">Telenor Annual Report 2020</a> - Note 29; p.140; Financial risk management <a href="#">Telenor Code of Conduct</a>	
102-12	External initiatives	The most important social charters, principles, or other initiatives to which Telenor subscribes or endorses are: <ul style="list-style-type: none"> <li>• UN Global Compact</li> <li>• UN Global Goals for Sustainable Development</li> <li>• OECD Guidelines for Multinational Enterprises</li> <li>• Children's Rights and Business Principles (CRBP)</li> <li>• GRI</li> <li>• CDP (former Carbon Disclosure Project)</li> <li>• TCFD (Task Force on Climate-related Financial Disclosures)</li> <li>• Principles of the World Economic Forum</li> <li>• Global Network Initiative (GNI)</li> </ul> <a href="#">Reporting our performance</a>	

GRI standard	Standard disclosure	Telenor response	UN Global Compact
102-13	Membership of associations	<ul style="list-style-type: none"> <li>• GSMA (Global Mobile Operators' Association)</li> <li>• Joint Audit Committee (JAC)</li> <li>• United Nations Global Compact (UNGC)</li> <li>• Confederation of Norwegian Enterprise (NHO)</li> <li>• Child Labour Platform (CLP)</li> <li>• UNI Global Union</li> </ul>	
<b>2. STRATEGY</b>			
102-14	Statement from senior decision-maker	<a href="#">Statement from CEO</a>	
<b>3. ETHICS AND INTEGRITY</b>			
102-16	Values, principles, standards, and norms of behavior	<p>Telenor has zero tolerance on corruption and Telenor's ethical standards promote proper business practices and reflect relevant laws, regulations, and internationally recognised standards.</p> <p>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.</p> <p><a href="#">Telenor Code of Conduct</a>  <a href="#">Telenor ethics and anti-corruption programme</a>  <a href="#">Anti-corruption</a></p>	Principle 10 SDG 16
102-17	Mechanisms for advice and concerns about ethics	<p>To encourage individuals such as employees, suppliers, and other stakeholders to voice their concerns, Telenor has established a global external reporting hotline and website (Integrity Hotline).</p> <p><a href="#">Integrity Hotline</a>  <a href="#">Telenor Annual Report 2020</a> p. 37</p>	Principle 10 SDG 16
<b>4. GOVERNANCE</b>			
102-18	Report the governance structure of the organization, including committees of the highest governance body. Committees responsible for decision-making on economic, environmental, and social topics.	Corporate Governance Report as part of <a href="#">Telenor Annual Report 2020</a> p. 36-61 <a href="#">Corporate Governance</a> and <a href="#">Group Executive Management</a>	
<b>5. STAKEHOLDER ENGAGEMENT</b>			
102-40	List of stakeholder groups	Stakeholders engaged for materiality matrix include policy makers, investors, employees, community & media, customers and NGOs- outlined online at <a href="#">Stakeholder Engagement</a> and in <a href="#">Telenor Annual Report 2020</a> p. 14	
102-41	Collective bargaining agreements	In our Nordic operations, all employees are covered by collective agreements due to the legal principle general application for all employees.	SDG 8

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		In Asia, the first Union within the ICT-sector has been approved in Grameenphone, Bangladesh. The parties are working together towards a collective bargaining agreement. In Malaysia there is also a recognized union with a collective agreement. <a href="#">Telenor Annual Report 2020</a> p.77 Labour standards and Employee Rights	
102-42	Identifying and selecting stakeholders	<a href="#">Reporting Scope and Principles</a>	
102-43	Approach to stakeholder engagement	<a href="#">Telenor Annual Report 2020</a> p.62 <a href="#">Telenor Investor Relations Stakeholder Engagement</a> <a href="#">Telenor Materiality Assessment</a> <a href="#">Telenor Myanmar's Sustainability Briefing 2020</a>	
102-44	Key topics and concerns raised	This is outlined in Telenor's materiality assessment process. <a href="#">Telenor Materiality Assessment</a> <a href="#">Telenor Annual Report 2020</a> p.62	
<b>6. REPORTING PRACTICE</b>			
102-45	Entities included in the consolidated financial statements	<a href="#">Telenor Annual Report 2020-Segment information</a> -p.103 <a href="#">Reporting our Performance</a>	
102-46	Defining report content and topic Boundaries	Approach to defining report content and materiality matrix is outlined online: <a href="#">Scope and Principles</a>	
102-47	List of material topics	<b>Telenor's material aspects</b> <ul style="list-style-type: none"> <li>• Digital inclusion</li> <li>• Social innovation</li> <li>• Respect for Human Rights</li> <li>• Customer and employee privacy framework</li> <li>• Cyber security</li> <li>• Mobile communications and health</li> <li>• Economic contribution to society</li> <li>• Corporate governance framework</li> <li>• Anti-corruption</li> <li>• Transparency and stakeholder engagement</li> <li>• Employee diversity, equality, and inclusion</li> <li>• Employee health, safety, and security</li> <li>• Supply chain risk and resilience</li> <li>• Labour standards / Employee Rights</li> <li>• Climate change resilience</li> <li>• Environmental management</li> </ul> <a href="#">Telenor Materiality Assessment</a>	
102-48	The effect of any restatements of information given in previous reports, and the reasons for such restatements.	<a href="#">Sustainability Key Figures</a> It states that the factors used for calculating CO2 emissions, has this year been changed from local based to market-based emission factors for Scope 2 grid electricity.	

GRI standard	Standard disclosure	Telenor response	UN Global Compact
102-49	Changes in reporting	DNA Finland was consolidated in August 2019 and has been included in the sustainability reporting for 2020.	
102-50	Reporting period	Calendar year 2020	
102-51	Date of most recent report	Previous report published in 2020, covering calendar year 2019	
102-52	Reporting cycle	Annual	
102-53	Contact point for questions regarding the report	Eyvind Lome E-mail: <a href="mailto:sustainability@telenor.com">sustainability@telenor.com</a>	
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option	
102-55	GRI content index	The GRI index can be found here: <a href="http://www.telenor.com/sustainability/reporting/gri-index/">http://www.telenor.com/sustainability/reporting/gri-index/</a>	
102-56	External assurance	An independent assurance of the content of this report has been done by DNV Business Assurance.	
<b>GRI 103: MANAGEMENT APPROACH 2016</b>			
103-1	Explanation of the material topic and its Boundary	See separate report page 12 in this document	
103-2	The management approach and its components	See separate report page 12 in this document	
103-3	Evaluation of the management approach	See separate report page 12 in this document	
<b>GRI 201: ECONOMIC PERFORMANCE 2016</b>			
201-1	Direct economic value generated and distributed	<a href="#">Telenor Annual Report 2020</a> – p.86	SDG 2, 5, 7, 8, 9, 10
201-2	Financial implications and other risks and opportunities due to climate change	In terms of climate-related regulator risks, Telenor may face higher operational costs related to carbon taxes, rising energy prices and internationally binding agreements. Climate-related physical risks may cause disruptions or catastrophic damage to infrastructure, such as network base stations and electrical power lines. Our industry's technology and smart services through Internet of Things (IoT) also have the potential to cut global carbon emissions, <a href="#">Telenor Annual Report 2020</a> – Climate risk assessment p.83	Principle 7
201-3	Defined benefit plan obligations and other retirement plans	<a href="#">Telenor Annual Report 2020</a> - note 26 - Pension obligations - p.134-136 and Compensation policy p.46 and 49	
<b>GRI 203: INDIRECT ECONOMIC IMPACT 2016</b>			
203-1	Infrastructure investments and services supported	<a href="#">Telenor Annual Report 2020</a> - p.74 Economic Contribution and <a href="#">Telenor SDG Impact Assessment</a>	SDG 2, 5, 7, 9, 10, 11
203-2	Significant indirect economic impacts	<a href="#">Telenor Annual Report 2020</a> - p. 67 Social Innovation and p.74 Economic Contribution and <a href="#">Telenor SDG Impact Assessment</a>	SDG 1, 2, 3, 8, 10, 17



GRI standard	Standard disclosure	Telenor response	UN Global Compact
<b>GRI 204: PROCUREMENT PRACTICES 2016</b>			
204-1	Proportion of spending on local suppliers	<p>Identified omission: Percentage is not disclosed. Reason for omission: Telenor promotes fair competition through transparent and professional sourcing processes and equal treatment of all suppliers. Telenor optimises its global sourcing power to exploit market opportunities and thereby obtaining more attractive total cost of ownership. All local business units shall use group standards, processes, and agreements where they are established. Suppliers in competition for contracts with Telenor shall be able to trust our selection processes.</p> <p>As a result, we do not report the percentage of the procurement budget used for significant locations of operation spent on suppliers local to that operation.</p> <p>See also: <a href="#">Telenor Code of Conduct</a> and section “Anti-corruption” on page 68 in <a href="#">Telenor Annual Report 2020</a></p>	SDG 1, 5, 8, 10
<b>GRI 205: ANTI-CORRUPTION 2016</b>			
205-2	Communication and training about anti-corruption policies and procedures	<p>A key element in the Anti-Corruption Programme is capacity-building and regular training of employees. Our anti-corruption training ranges from e-learning programs, dilemma-training and other awareness activities.</p> <p>Telenor Group’s commitment to integrity and transparency is clearly stated in Telenor’s Code of Conduct. A description of Telenor’s Anti-Corruption Programme and the Ethics and Compliance function is publicly available on the web sites: <a href="https://www.telenor.com/about-us/corporate-governance">https://www.telenor.com/about-us/corporate-governance</a> and <a href="https://www.telenor.com/about-us/corporate-governance/anti-corruption/">https://www.telenor.com/about-us/corporate-governance/anti-corruption/</a></p> <p>The Integrity Hotline is a confidential channel available to all employees and Business Partners where anyone can ask questions and raise concerns about possible breaches of Telenor’s Code of Conduct, including relevant laws, regulations, and governing documents.</p> <p>See also <a href="#">Telenor Annual Report 2020</a> -p.36-37 During 2020, Telenor performed more than 24,000 Man-hours training of suppliers’ employees covering Health, Safety and Security as well as Anti-corruption. See also: <a href="#">Key figures</a></p>	Principle 10 SDG 16
<b>GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016</b>			
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	<a href="#">Telenor Annual Report 2020</a> -p.120; Note 34; Legal disputes and contingencies	

GRI standard	Standard disclosure	Telenor response	UN Global Compact
<b>GRI 302: ENERGY 2016</b>			
302-1	Energy consumption within the organization	For the indicators 302-1, 302-3 and 302-4; Telenor's total GHG emissions and energy consumptions for 2020 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol. <a href="#">Telenor key energy figures</a> and <a href="#">Telenor Group Sustainability analytical tool 2020</a>	Principle 7, 8, 9 SDG 10, 13
302-3	Energy intensity	Reported figures are for total Telenor Group in the financial year 2020. <ul style="list-style-type: none"> <li>Energy intensity ratio for all our business units- where the ratio denominator is total revenues: 250 GWh/billion USD</li> <li>All our reported fuel, electricity, heating/cooling consumptions are included in the energy intensity ratio.</li> <li>The reported ratio uses energy consumed both within and outside the Telenor organization.</li> </ul> Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: <a href="#">Reporting our performance</a>	Principle 7, 8, 9 SDG 10, 13
302-4	Reduction of energy consumption	Reported figures are for total Telenor Group in the financial year 2020.  Telenor's total energy consumption was approximately 3,257 GWh – a reduction by 6.9 percent compared to numbers from 2019 included DNA Finland. Boundaries/scoping, standards, methodologies, conversion factors and other assumptions used as reported to CDP: <a href="#">Reporting our performance</a>	Principle 7, 8, 9 SDG 10, 13
<b>GRI 305: EMISSIONS 2016</b>			
305-1	Direct (Scope 1) GHG emissions	For the indicators 305-1, 305-2, 305-3, 305-4 and 305-5; Telenor's total GHG emissions and energy consumptions for 2020 have been independently verified through a limited assurance by DNV GL based on the ISO 14064- 3 standard/GHG Protocol. <a href="#">Telenor key energy figures</a> and <a href="#">Telenor Group Sustainability analytical tool 2020</a>  We use financial control as consolidation approach for our reported emissions: All operating business units where Telenor is a majority owner (owner of more than 50% of the shares).	Principle 7, 8, 9 SDG 10, 13
305-2	Energy indirect (Scope 2) GHG emissions	Total gross energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent for all	Principle 7, 8, 9



GRI standard	Standard disclosure	Telenor response	UN Global Compact
		our business units: 1.040 million tonnes (market based electricity emission factors) and 0.848 million tonnes (local based electricity emission factors)	SDG 10, 13
305-3	Other indirect (Scope 3) GHG emissions	Total gross other indirect (Scope 3 – Travel and transportation) GHG emissions in metric tons of CO2 equivalent for all our business units: 0.006 million tonnes of CO2	Principle 7, 8, 9 SDG 10, 13
305-4	GHG emissions intensity	Reported figures are for total Telenor Group in the financial year 2020. <ul style="list-style-type: none"> <li>GHG emissions intensity ratio for all our business units- where the ratio denominator is total revenues: 0.094 million tonnes CO2/ billions of USD</li> <li>All our reported fuel, electricity, heating/cooling consumptions are included in the GHG emissions intensity ratio.</li> <li>The reported ratio uses GHG emissions from both direct (Scope 1), energy indirect (Scope 2), other indirect (Scope 3).</li> </ul>	Principle 7, 8, 9 SDG 10, 13
305-5	Reduction of GHG emissions	Total scope 1 and 2 GHG emissions were close to 1.22 million tonnes of CO2e, calculated with market-based electricity emission factors and DNA Finland included. This is approximately the same amount as in 2019. Carbon emissions per petabyte of mobile data traffic decreased by approx. 39% - to 130 tonnes CO2e / petabyte. More information; <a href="#">Telenor Annual Report 2020</a> - p.82-83 and <a href="#">Climate impact</a>	Principle 7, 8, 9 SDG 10, 13
<b>GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016</b>			
308-1	New suppliers that were screened using environmental criteria	Telenor require all suppliers to follow the <a href="#">Supplier Conduct Principles</a> encompassing environmental and other sustainability requirements.	Principle 7, 8, 9 SDG 13
<b>GRI 401: EMPLOYMENT 2016</b>			
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Benefits such as pension, insurance, allowances, and leave are all important elements ensuring total compensation is aligned with local market practice, regulations, and employment conditions, while also providing a foundation for the financial security and well-being of employees. Benefits are offered in alignment with local market regulations, and the cover may vary between different employment types.	Principle 6 SDG 8
<b>GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018</b>			
403-3	Workers with high incidence or high risk of diseases related to their occupation	<a href="#">Telenor Annual Report 2020</a> - p. 78	SDG 8
<b>GRI 404: TRAINING AND EDUCATION 2016</b>			

GRI standard	Standard disclosure	Telenor response	UN Global Compact
404-2	Programs for upgrading employee skills and transition assistance programs	Telenor continues to invest in upskilling employees as well as modernising the way we work. <a href="#">Telenor Annual Report 2020</a> - p.15	Principle 6 SDG 4, 5, 8,10
404-3	Percentage of employees receiving regular performance and career development reviews	All employees shall receive regular performance and career development reviews regardless of category and gender. This is a global group requirement.	Principle 6 SDG 4, 5, 8, 10
<b>GRI 406: NON-DISCRIMINATION 2016</b>			
406-1	Incidents of discrimination and corrective actions taken	<a href="#">Telenor Annual Report 2020</a> - p. 69 and <a href="#">Telenor Integrity Hotline</a>	Principle 6 SDG 5, 10, 16
<b>GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING 2016</b>			
h407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Telenor is committed to respecting labour rights principles as laid down in UN Global Compact and ILO's fundamental conventions. These principles relating to respecting the rights to freedom of association and collective bargaining, the elimination of forced labour, child labour and discrimination in the workplace, are reflected in Telenor's Code of Conduct and Group Policy People as well as Supplier Conduct Principles. Telenor shall comply with applicable laws and regulations. If there are differences between such laws and regulations and the standards set out in our Code of Conduct, Telenor will apply the higher standard consistent with applicable local laws. <a href="#">Labour rights and standards</a> <a href="#">Telenor Annual Report 2020</a> - p.77	Principle 3 SDG 8
<b>GRI 408: CHILD LABOUR 2016</b>			
408-1	Operations and suppliers at significant risk for incidents of child labor	All Business Units shall conduct a human rights due diligence including risk mapping in these areas. We practise a zero tolerance in this area and the risk is greater in our operations in Asia, especially manufacturing and work intensive production companies etc. All suppliers are legally bound to obey international standards in this area. This is also an important part of the regular inspections executed locally; we check compliance by numerous inspections across Group every year. Incidents in these areas shall be reported immediately and corrective actions are required at once. We also include this in training & awareness sessions/supplier conferences organised locally. See more about underage labour: <a href="#">Telenor Annual Report 2020</a> - p.81	Principle 2, 5 SDG 10, 16
<b>GRI 409: FORCED OR COMPULSORY LABOR 2016</b>			

GRI standard	Standard disclosure	Telenor response	UN Global Compact
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	See section Supply Chain Risk and Resilience in <a href="#">Telenor Annual Report 2020</a> - p.81 and website <a href="#">Supply Chain Sustainability</a>	Principle 4 SDG 8, 10
<b>GRI 410: SECURITY PRACTICES 2016</b>			
410-1	Security personnel trained in human rights policies or procedures	Identified omission: Percentage is not disclosed. Reason for omission: Telenor's ambition is that all security personnel, directly or indirectly employed, shall have performed internal health, safety, security, and environmental training, where human rights and health and security issues are part of training. As all Telenor companies shall have management system according to ISO 45001, the follow up and training is part of the management system processes.	Principle 1 SDG 16
<b>GRI 411: RIGHTS OF INDIGENOUS PEOPLES 2016</b>			
411-1	Incidents of violations involving rights of indigenous peoples	In 2020 we are not aware of any reported incidents	Principle 1 SDG 2
<b>GRI 412: HUMAN RIGHTS ASSESSMENT 2016</b>			
412-1	Operations that have been subject to human rights reviews or impact assessments	To help us navigate and identify the most salient human rights impacts, we conduct human rights due diligence both at Group and business unit (BU) levels. Human rights impact is also included in our materiality assessment. Our activities are guided by the UN Guiding Principles on Business and Human Rights and other international frameworks including the Universal Declaration on Human Rights and the ILO Core Conventions. See <a href="#">Telenor Annual Report 2020</a> - p.69. Further we conduct assessments related to e.g. specific projects, entry into new markets etc.	Principle 1
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	All suppliers and partners that have 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 2020, we have signed more than 6,100 ABCs with almost all our active suppliers that we have defined as in-scope for ABC  The Agreement on Responsible Business Conduct that includes human rights clauses are implemented broadly to all suppliers. "Suppliers" are defined widely and covers all contracting parties also significant investments agreements. <a href="#">Telenor Annual Report 2020</a> - p.80.	Principle 2
<b>GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016</b>			
414-1	New suppliers that were screened using social criteria	The Business Units evaluate the Supplier Conduct Principles risk for any existing or potential	SDG 5, 8, 10, 16

GRI standard	Standard disclosure	Telenor response	UN Global Compact
		Supplier and/or its Sub Suppliers. Close to 100% of new suppliers were screened using labour practices criteria	
414-2	Negative social impacts in the supply chain and actions taken	During 2020, Telenor recorded and addressed one case 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. <a href="#">Telenor Annual Report 2020</a> - p.81.	SDG 5, 8, 10, 16
<b>GRI 416: CUSTOMER HEALTH AND SAFETY 2016</b>			
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	We have not identified any incidents or non-compliances with H&S regulations and applicable standards in 2020	SDG 16
<b>GRI 417: MARKETING AND LABELING 2016</b>			
417-2	Incidents of non-compliance concerning product and service information and labeling	Telenor is not aware of any incidents or non-compliances concerning product and service information and labelling in 2020	SDG 12, 16
<b>GRI 418: CUSTOMER PRIVACY 2016</b>			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Telenor is not aware of any substantiated complaints regarding breaches of customer privacy and losses of customer data in 2020.	SDG 16
<b>GRI 419: SOCIOECONOMIC COMPLIANCE 2016</b>			
419-1	Non-compliance with laws and regulations in the social and economic area	Telenor Group's operations are subject to requirements through sector specific laws, regulations, and national licenses. Regulatory developments and regulatory uncertainty could affect the Group's results and business prospects. See <a href="#">Telenor Annual Report 2020</a> – p.23: Risk management and note 34 Legal disputes and contingencies – p.148.	SDG 16

## GRI 103: Management Approach

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

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

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

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

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

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

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

- [Code of Conduct](#)
- [Supplier Conduct Principles](#)
- [Telenor Group Human Rights Principles](#)
- [Our Culture](#)
- [Sustainability at Telenor](#)

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

For commitments targets and actions on our material aspects, please see the relevant section in the [Telenor Sustainability Report as part of the Telenor Annual Report 2020](#)

### GRI 103-3 Evaluation of the management approach

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

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

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2020
<p><b>Digital Inclusion</b> - access to the service in all markets, including rural and remote areas. In emerging markets focus on bridging the digital divide.</p>	<p>The importance of ensuring access for all is essential to Telenor's effort to empower societies. Telenor sees this development as integral with the company's commitment to reduce inequalities in the societies where it operates. This is part of Telenor's business strategy and is managed accordingly throughout the entire Group.</p>	<p>We carefully track and report development of network capacity and coverage. This is reported all the way to top management at regular intervals.</p>	<p><a href="#">Telenor Annual Report 2020</a> page 22 and 69 Digital Inclusion</p>
<p><b>Social Innovation</b> -including solutions with social benefits, such as mFinance, mHealth, mAgri, mEducation, mGovernment, mWomen and smart working.</p>	<p>Given the nature of this material aspect, it is difficult to establish a separate governing document; however, it is a key focus in our strategy, firmly placing a responsibility throughout the business units with a coordinating responsibility at Group Sustainability.</p>	<p>Monitored and followed up by counting number of birth registrations and other indicators. The different results are communicated to Group for continuous evaluation and improvement.</p>	<p><a href="#">Telenor Annual Report 2020</a> page 67 and <a href="#">Social Innovation</a></p>
<p><b>Respect for Human rights</b> - ensuring that operations or business relationships do not infringe on human rights, -respecting the human right of freedom of expression</p>	<p>Telenor's <a href="#">Code of Conduct</a>, Policies, <a href="#">Supplier Conduct Principles</a> and <a href="#">Our Culture</a>, provide the Telenor Group with a common approach as to how we treat each other, how we serve our customers, how we run our business and what we believe our role to be in the societies where we operate.</p>	<p>Detailed reporting on how we work with Human Rights can be found in our annual report. As part of our membership with the GNI, we have committed to implement the <a href="#">GNI Principles</a> and undergo an independent assessment every two years to assess progress on this commitment.</p>	<p><a href="#">Telenor Annual Report 2020</a> - page 69 Respect for Human rights – Ambitions and targets</p>
<p><b>Customer and employee privacy framework</b> -keeping information safe and secure, being transparent about how we handle your data</p>	<p>Telenor's customers expect not only real-time, relevant, and individualised services, they also expect that their privacy is safeguarded. 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.</p>	<p>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.</p>	<p><a href="#">Telenor Annual Report 2020</a> page 71 – Ambitions and targets</p>
<p><b>Cyber security</b> - avoiding information being overused for commercial or other purposes or stolen</p>	<p>As a network operator and a global provider of digital services, Telenor is at constant high risk of cyber-attacks. Advanced threat actors are increasingly aiming to steal information, modify customer data or make our services unavailable. Telenor is continuously implementing security capabilities to prevent and reduce the effect of a range of threats, including the</p>	<p>Alignment with our approach and governing principles is carefully monitored by our security functions.</p>	<p><a href="#">Telenor Annual Report 2020</a> page 22 and 72 Cyber security – Ambitions and targets</p>



Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2020
	ability to swiftly detect and respond to unwanted activities.		
<b>Mobile communications and health</b> <i>- including electromagnetic fields from masts and mobile phones, user complaints concerning issues such as radiation, radio waves and Wi-Fi</i>	Whenever Telenor installs new network equipment, we ensure public health and safety by adhering strictly to the electromagnetic exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines are endorsed by the World Health Organisation (WHO). The responsibility lies with each business unit.	Since all business units must work in accordance with national and international guidelines and these represent the basis for all our planning, installation work and safety measures at antenna sites; this is monitored by the line management	<a href="#">Telenor Annual Report 2020</a> page 73 – Mobile masts and health – Ambitions and targets
<b>Economic contribution to society</b> <i>- includes investments in local communities, including job creation, skills development, charitable contributions, tax and licenses</i>	The topic is an integrated part of our financial governance system.	In addition to following international accounting standards, Telenor has reported direct, country-by-country impact on investment, taxation, and employment, since 2014.	<a href="#">Telenor Annual Report 2020</a> page 74 Economic contribution to society
<b>Corporate governance framework</b> <i>- including policies ensuring board independence, board diversity, remuneration and responsibility and accountability of the board</i>	Telenor’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. The governance framework is used as a platform to integrate material sustainability issues into its business strategies, daily operations, and relationship with stakeholders.	Business Unit performance reviews are conducted regularly with each of the main BUs in the Telenor Group, and are chaired by the Group CFO with participation from other relevant functional EVPs. The purpose of these meetings is to monitor and follow-up key strategic priorities, financial and operational performance relative to defined targets.	<a href="#">Telenor Annual Report 2020</a> page 36, 37
<b>Anti-corruption</b> <i>- including anti-corruption and bribery, anti-competitive behaviour</i>	Telenor has zero tolerance for corruption. Our 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, the Group Policy on Anti-Corruption, Group Policy on Third Party Risk, and other guidance and governing documents.	Ensuring the right corporate governance platform for ethics, anti-corruption, and transparency, undertaking social and environmental responsibility, and respecting human rights and labour rights, is monitored and managed through our Code of Conduct and other guiding documents	<a href="#">Telenor Annual Report 2020</a> page 68 Anti-corruption – Ambitions and targets
<b>Transparency and stakeholder engagement</b> <i>- includes provision of timely, accessible, and accurate disclosure of performance, goals and</i>	These topics are managed through a combination of following public reporting requirements as well as being an active participant in several regional and international initiatives (Global Compact, GNI, GRI, etc.). Telenor believes good corporate governance involves	In addition to internal overview and control, our actions, results, and reporting is monitored both through independent third-party assurance as well as various interactions with local stakeholders.	<a href="#">Telenor Annual Report 2020</a> - page 14 and 63

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2020
<i>policies related to sustainability activities.</i>	accountability, responsibility, transparency, fairness, and effective engagement between all internal and external stakeholders.		
<b>Employee diversity, equality, and inclusion</b> <i>-including diversity, attraction and retention of the best people, training and development opportunities and career prospects</i>	At Telenor, attracting and retaining the best talent through learning 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.	Responsibility of tracking policy requirements, goals and targets lies with the line management. Group People and Sustainability oversees the process.	<a href="#">Telenor Annual Report 2020</a> - page 75 – Ambitions and targets
<b>Employee health, safety, and security</b> <i>- covers employees as well as in-house contractors, vendors, and suppliers</i>	Telenor sets high standards in health, safety, and people security (HS&S). Maintaining a working environment and a culture that nurture HS&S is important at Telenor. Telenor is committed to learn from experience and continuously improve its efforts within HS&S.	Responsibility of tracking policy requirements, goals and targets lies with the line management and Group People and Sustainability oversees the process.	<a href="#">Telenor Annual Report 2020</a> - page 78 – Ambitions and targets
<b>Supply chain risk and resilience</b> <i>- including human rights, occupational health, safety and personnel security, environment, conflict minerals, hazardous materials, etc.</i>	Telenor strives for high sustainability standards and continuous improvement in its operations throughout the supply chain and works to ensure that its suppliers take a similar approach. Telenor’s approach to supply chain sustainability is to legally oblige the supplier to uphold responsible business practice, monitor compliance with Telenor’s requirements and to undertake capacity-building among its suppliers.	Telenor carries out inspections to monitor compliance with the requirements on responsible business conduct.	<a href="#">Telenor Annual Report 2020</a> page 22 and page 80 - Ambitions and targets
<b>Labour standards / Employee Rights</b> <i>- relate to respecting the rights to freedom of association and collective bargaining, the elimination of forced labour, child labour and discrimination in the workplace, etc.</i>	Telenor is committed to respecting labour rights principles as laid down in the UN Global Compact and International Labour Organization’s fundamental conventions. These principles are reflected in Telenor’s Code of Conduct, Group People Policy and Supplier Conduct Principles. Upholding labour rights will also be crucial when addressing the future of work, as professions evolve due to automation and the energy transition.	Telenor is promoting partnerships based on good and trusting dialogue, e.g. in relation to acknowledged unions or through local cooperation bodies such as the People Council.	<a href="#">Telenor Annual Report 2020</a> page 77 - Ambitions and targets

Material aspects as in GRI 102-47	How we manage it	How it is monitored	Targets and Results 2020
<p><b>Climate change resilience</b> - including energy efficiency, energy use and reduction of greenhouse gas emissions– as well as services and technologies that enable society/ customers to reduce their climate impact</p>	<p>Climate change is today one of the greatest challenges facing people, businesses, and governments. Climate related risks include potential damage to vital infrastructure and utilities through the impact of more extreme weather events. Please see <a href="#">Climate impact</a></p>	<p>Energy use and emissions are closely monitored and followed up in all operations in line with the Group Sustainability Policy.</p>	<p><a href="#">Telenor Annual Report 2020</a> page 82</p>
<p><b>Environmental management</b> - including EMS and waste management, circular economy, energy efficiency, energy use and reduction of greenhouse gas emissions</p>	<p>Telenor is committed to protecting the environment and contributing to the prevention of climate change. Please see <a href="#">Environmental Management</a></p>	<p>Environmental Management Systems (EMS) in line with ISO 14001 shall be in place and followed-up in all business units.</p>	<p><a href="#">Telenor Annual Report 2020</a> page 82</p>