



SUSTAINABILITY REPORT

Connecting You to What Matters Most
Empowering Societies

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ABOUT TELENOR PAKISTAN



Telenor Pakistan, owned by the Telenor Group, is an international provider of high-quality voice, data, content and mobile communication services in nine markets across Scandinavia and Asia. Telenor Group is amongst the largest mobile operators in the

world with 180 million mobile subscriptions and a workforce of approximately 20,000. In Pakistan, it acquired the license of providing GSM services in 2004 and began its commercial operations on March 15, 2005. Telenor Pakistan's corporate headquarters are

in Islamabad, with regional offices in Karachi, Lahore, Faisalabad, Multan, Hyderabad and Peshawar. It has a subscriber base of over 48 million, making it Pakistan's second largest mobile operator with over 27% market share.



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MESSAGE FROM CEO – TELENOR PAKISTAN



In a world challenged by public health crisis, every day reminds us of our commitment and responsibility towards communities across the nation. Telenor Pakistan has been strongly committed to safeguarding the health and safety of its customers, employees, partners, and communities around the country. Our active involvement in a multitude of initiatives to help people and businesses especially in these tough times, is a testament to the company's legacy of responsible business practices, and its purpose of empowering societies and connecting people to what matters most.

As countries around the world practice measures to contain the spread of the virus, Telenor Pakistan has been taking strict precautions to protect partners, employees and their families while delivering impeccable customer service. The telecom industry being a valuable platform to deal with emergencies, has been facing challenges to run its normal operations with the new SOPs; however, Telenor Pakistan's dedicated teams have been continuously providing their wholehearted commitment to connecting people across Pakistan. We firmly believe in our corporate social responsibility and aim to contribute to the UN's Sustainable Development Goals (SDGs).

The COVID-19 pandemic has significantly increased dependency on data and connectivity as Pakistanis work and study from home. As a result, we see development in areas of e-education, e-commerce, financial and health services, to name a few. Since its inception, Telenor Pakistan has been firmly committed to empowering societies through digital and financial inclusion. Apart from providing connectivity, Telenor Pakistan's goals include bridging the digital divide, fortifying socio-economic growth, promoting financial inclusion, bringing efficacy in numerous sectors, and uplifting sustainable development. Through these initiatives we are enabling people to connect to what matters most to them.

Telenor Pakistan's top priority has always been the endorsement of inclusion, commitment to empower communities, and to raise working standards in markets we operate. Climate change has been one of the greatest challenges facing the company, and we believe in transparent reporting of our emissions, while directing energy efficient initiatives that focus on climate-friendly technologies. Telenor Pakistan aims to further improve these efforts and reduce the carbon footprint across the board.

In 2021 and beyond, we will continue exploring new ways to generate positive outcome for customers and societies around the country. Through Telenor Pakistan's commitment to the Sustainable Development Goals and the Global Compact Principles, it plans to continue raising operational standards and improving supply chain efficiency. We are extremely proud of and grateful to the teams who, despite the pandemic, have been working tirelessly to ensure connectivity, for all at a time when it's needed the most. We have continued to align our safety protocols for work with World Health Organization and local health officials during Covid-19, and will adapt to new guidelines as and when required.

Telenor Pakistan will continue to lead Pakistan's digital transformation through innovative and inclusive ICT-powered services in areas of banking, agriculture, healthcare, education, digital skills and many more. The impact of our efforts will grow exponentially if various stakeholders and partners collaborate to build and strengthen the digital ecosystem in Pakistan.

Irfan Wahab Khan
CEO Telenor Pakistan

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COVID-19 - THE NEW NORMAL



Telenor Pakistan has been ensuring seamless connectivity to its users around the country, enabling them to stay connected to their loved ones in these challenging times of COVID-19. Our teams have reshaped their working methodologies to ensure safety and wellbeing of everyone. Provision of protective kits and placement of caution signs (safe distance between employees) around the workplace are amongst the safety measures that have

been taken to provide a comfortable working environment.

Proficient and experienced field teams of Telenor Pakistan, responsible for maintaining the network infrastructure, are carrying out daily risk assessments and taking care of any potential threats, blockages or risks associated with any node in the network. Employees have been provided with backup devices, regional no-objection certificates (NOC), and secure

VPN connections to ensure a smooth running of operations.

There are several contingency and crisis management protocols in place, with product and back-end support teams always online for effective operations. Telenor Pakistan is dedicated to providing the best services to its customers while staying true to the company's work ethics and philosophy.

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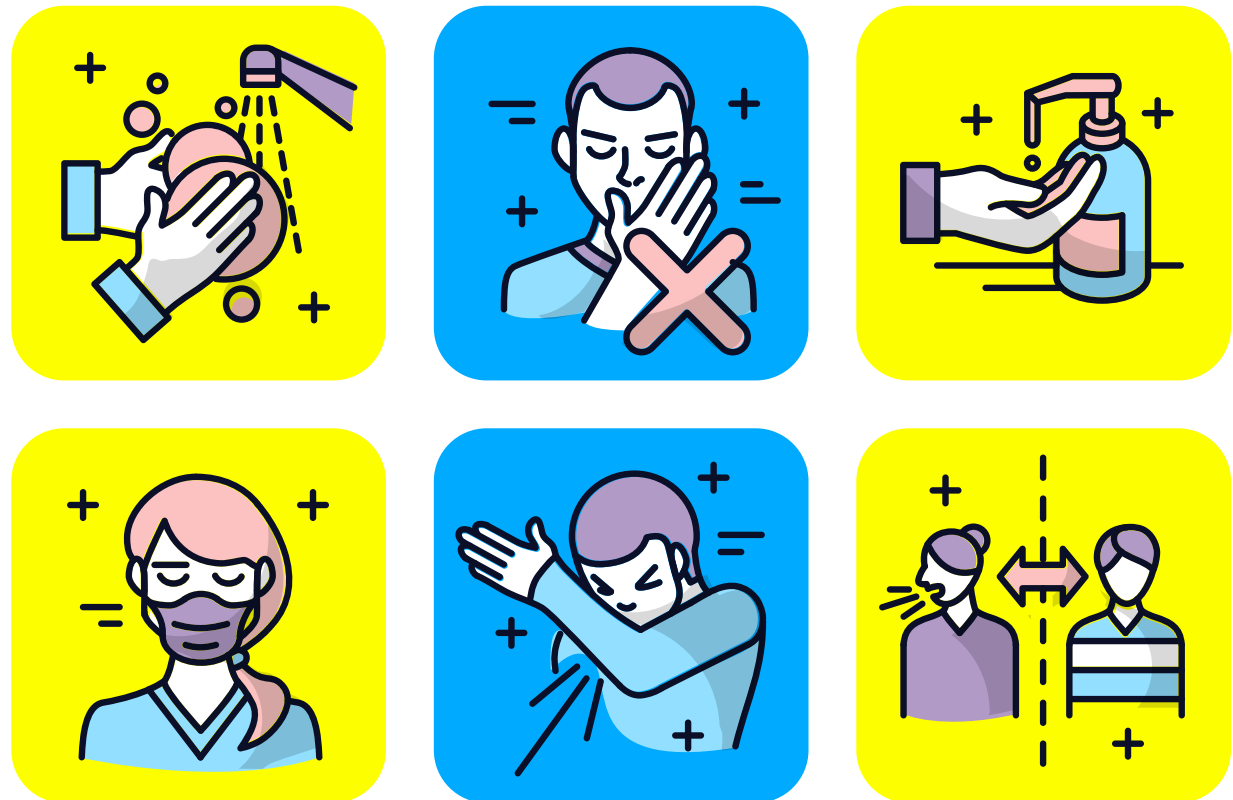
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PRECAUTIONARY MEASURES



CONTRIBUTION TO FIGHT COVID-19

Telenor Pakistan has contributed a total of PKR 1.6 billion as monetary and non-monetary support towards COVID-19 relief efforts by providing affordable services to help people in

staying connected to what matters most in these difficult times. Provision of protective kits to frontline workers in partnership with Pakistan Red Crescent Society (PRCS), food

supply to 4,500 affected families with low or no source of income, and support to the digital skills program of ministry of IT are few of the contributions made by Telenor Pakistan.

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Rs. 160 crore
Pakistan ke mustakbil ke naam



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EXECUTIVE SUMMARY

 <p>Safe Internet & School Outreach Program: Since inception of Safe Internet & School Outreach Program, Telenor Pakistan has educated more than 700,000 students across Pakistan on safe and responsible use of the internet.</p>	 <p>Digital Birth Registration Program: Telenor Pakistan in collaboration with UNICEF and the provincial governments registered more than 1.3 million children in 9 districts of Sindh and Punjab by providing the fundamental right to identity through technology.</p>	 <p>Diversity & Inclusion: Open Mind Pakistan: Since 2013, 108 Persons With Disabilities (PWDs) have graduated through this program.</p> <p>Disability Job Portal (DJP): In 2019, Telenor Pakistan launched first of its kind Disability Job Portal (DJP) to support PWDs in seeking jobs and to increase the access to livelihood opportunities for all.</p>
 <p>Supply Chain Sustainability: To ensure safe and responsible practices among partners and suppliers, 1,128 number of inspections and 15,408 hours of capacity building have been conducted by Telenor Pakistan.</p>	 <p>ISO Certifications: Telenor Pakistan remains committed to the highest standards of Health, Safety & Environment. It is the first telecommunication company in Pakistan certified on ISO 14001:2015 (Environmental Management System) in 2017 and ISO 45001:2018 (Occupational Health & Safety Management System) in 2019.</p>	 <p>Renewable Energy: Telenor Pakistan's solar sites network have increased to 1,088 in 2020 which marks a 26% increase in solar sites over the last two years. The Headquarters also produced about 11% of its electricity from solar energy in 2020.</p>
 <p>Digital Inclusion: Telenor Pakistan in collaboration with World Bank for the Girls Learn, Women Earn (GLWE) initiative has imparted trainings to over 1,000 aspiring women / entrepreneurs to enhance their digital skills and design thinking to promote girls' education and women empowerment in economic workforce of Pakistan.</p>	 <p>Carbon emissions Telenor Pakistan has achieved a 10% decrease in carbon emissions in 2020. Through our operations related to buildings, network, transportation, and use of refrigerants, we produced 174,726 tons of carbon dioxide emissions reducing by 14% from 2019.</p>	 <p>Innovation & Entrepreneurship: Telenor Pakistan's flagship 'Velocity Accelerator Program', launched four pilot projects, that benefited 32 startups and raised USD 3 Million in investment.</p>

SUSTAINABILITY AT TELENOR PAKISTAN

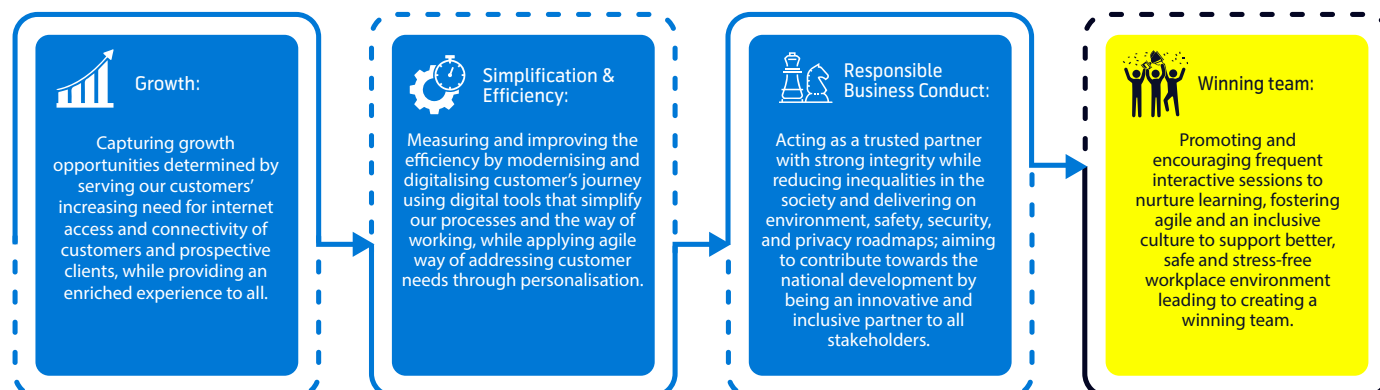
STRATEGY

Telenor Pakistan is committed to empower societies and connect people to what matters most; by providing not only basic connectivity to masses in Pakistan but also bridging the digital divide via internet access. Our customers wish to stay connected and have simplified access to the required services, therefore, Telenor Pakistan aims at providing digital access to its customers by making interactions easier and according to their

preferences. We plan to stay ahead of the curve and build capabilities that make Telenor Pakistan relevant for the future. We are strongly committed to be a trusted partner for our customers through a strong commitment to protecting their privacy and providing secure connectivity. Our customer-first approach is focused on tailoring our services and offers to meet the needs of our customers, because they matter to us the most.

Telenor is working to drive Pakistan towards an

advanced digital future considering the accelerated need for digital transformation, as revealed by the pandemic. In future, success will be defined by leadership in personalisation, modernisation and digitalisation, therefore, to respond to ever changing market dynamics, Telenor Pakistan is following agile leadership practices through short, iterative planning processes with actionable targets. Telenor Pakistan's sustainability strategy is driven by the following factors:



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MATERIALITY & STAKEHOLDERS

Assessment

Constant engagement with a wide range of stakeholders forms a key understanding in evaluating and shaping the materiality matrix.

Collection of views from internal and external stakeholders have been mapped against Telenor Pakistan’s strategic priorities and material topics: economic, environmental and

social.

Topics included in Telenor Pakistan’s 2019 - 2020 Materiality Assessment are:

ECONOMIC

- Ethics & Anti Corruption
- Privacy & Data Security
- Human Rights
- Taxation
- Supply Chain Sustainability
- Electromagnetic Field
- Service Reliability & Quality

ENVIRONMENTAL

- Climate Efficiency, Energy Use
- E-Waste Management
- Occupational Health & Safety

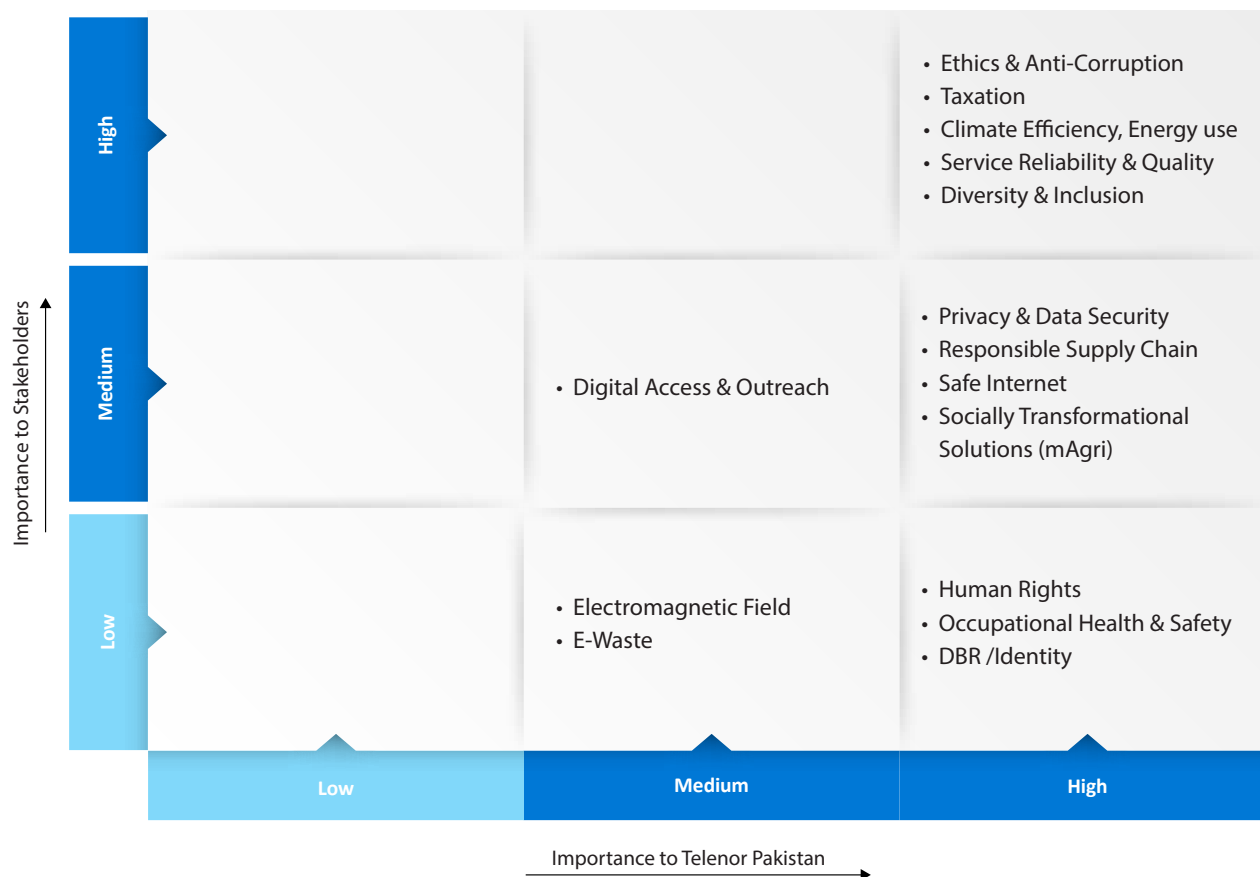
SOCIAL

- Digital Access & Outreach
- Diversity & Inclusion
- Safe Internet
- Digital Birth Registration /Identity
- Socially Transformational Solutions

The following matrix indicates various materiality issues grouped into broader topics, mapped against their importance to

stakeholders and potential financial or operational risks to the business. Key initiatives and performance indicators on these broad

topics along with sub-topics have been reported in this Sustainability Report.



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ACCOLADES 2019-2020

Digital Birth Registration:

Telenor Pakistan won three awards at the Ad Stars 2020 Awards in the following categories:

- **Gold Award-Innovate Use of Mobile Devices.**
- **Bronze & Crystal Award-Human Rights.**
- **Crystal Award-Public Service & Awareness.**

Universal Services Fund (USF):

Telenor Pakistan won the **Network Transformation Award 2020** in the category of "Community Crisis Support" for "USF - Extreme Remote Coverage Programme for Community Support".



Diversity & Inclusion:

- Telenor Pakistan won **Global Diversity & Inclusion Benchmarks Award 2020** in the category of "D&I Vision, Strategy & Business Case" at the "Best Practice Level", the highest level awarded to companies leading in diversity and inclusion while setting an example in the industry.
- Telenor Pakistan won an award in the same category in 2019 as well.

Social Responsibility:

Telenor Pakistan won the "**Shaukat Khanum Social Responsibility Award**" for its remarkable sustainability initiatives towards socioeconomic uplift of underprivileged citizens of Pakistan.

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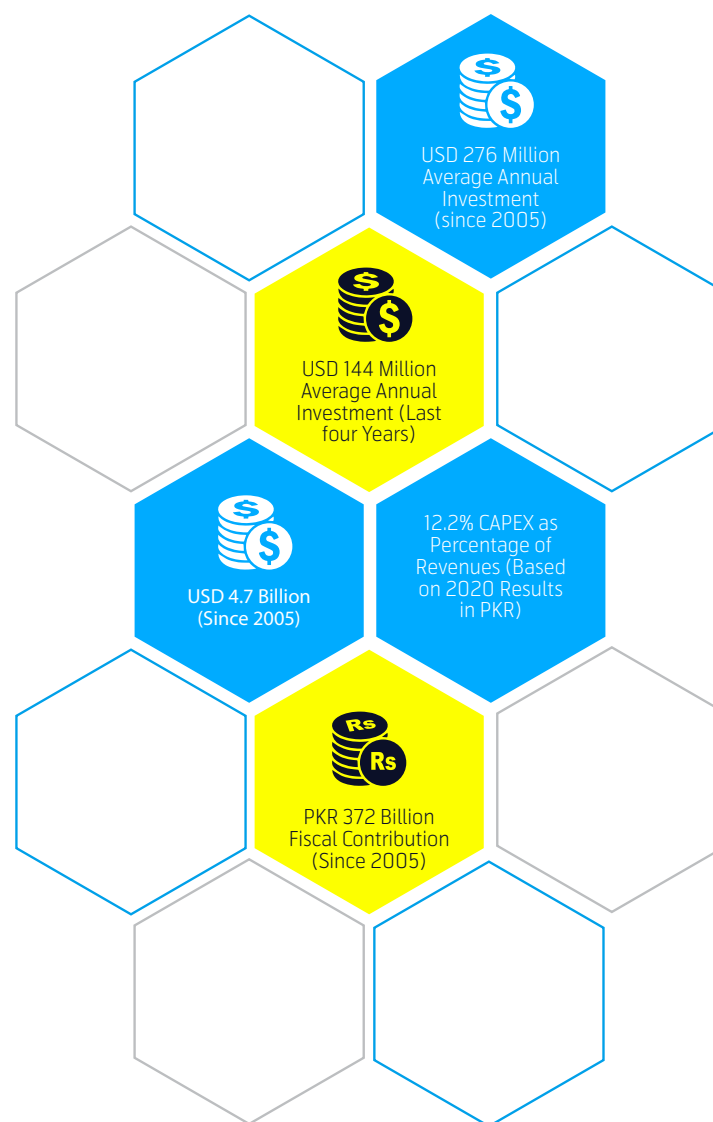
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SECTION 1: ECONOMIC CONTRIBUTION

INVESTMENTS IN PAKISTAN



EMPLOYMENT CREATION

Telenor Pakistan has provided a large number of employment opportunities to people over the years. As of December 31 2020, the company had 1,262 permanent full-time employees, in addition to the people who were directly and indirectly dependent on Telenor Pakistan for their livelihood in the capacity of distributors, retailers, suppliers, vendors, contractors and other business partners.

With a network of over 12,000 sites, Telenor Pakistan covers 87% of the population, proudly connecting more than 48 million mobile customers to what matters most.

CONTRIBUTION TO THE EXCHEQUER

Telenor Pakistan is a compliant taxpayer committed to tax reporting based on responsibility, openness and transparency. We are devoted to working with relevant stakeholders to drive transparency and

develop an efficient tax system while following recommendations on good governance on tax affairs. Telenor Pakistan endeavours to communicate with tax authorities through evidence-based opinions while pursuing its Code of Conduct. It is determined to contribute to the economic, environmental, and social development of Pakistan. Telenor Pakistan has contributed over PKR 372 Billion to the Pakistani Exchequer in the form of direct and indirect taxes remaining transparent and accountable since its inception.

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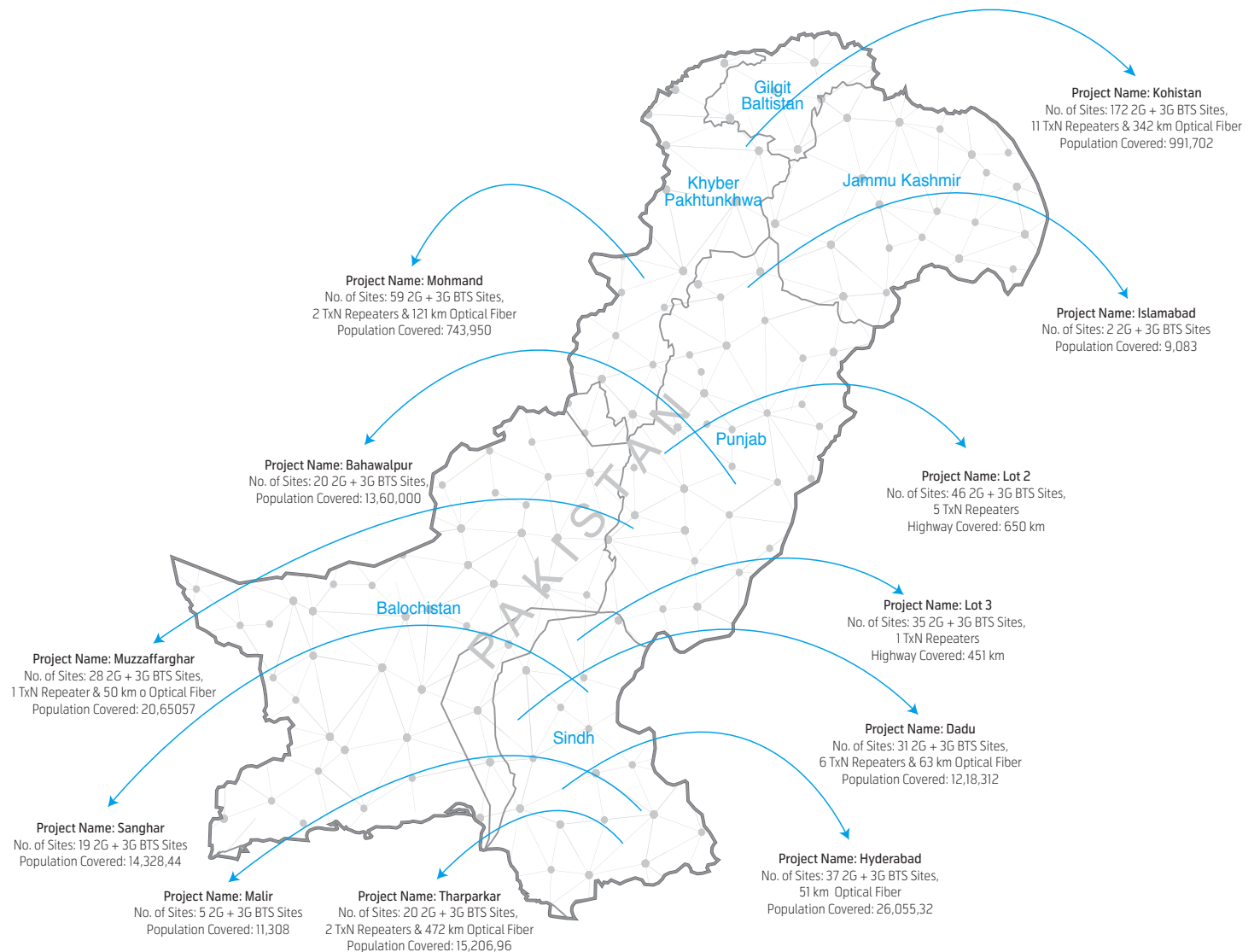
UNIVERSAL SERVICE FUND

Telenor Pakistan in collaboration with Universal Service Fund (USF) has ensured the provision of telecom, digital and mobile internet services to the unserved population of Pakistan. It has been extremely challenging to

provide the coverage in remote areas having extreme temperatures in a geography of barren deserts and mountainous regions. Telenor Pakistan’s mission is to bring the marginalised communities of the country within the digital and financial sphere. Despite the challenges faced due to harsh weather conditions, tough terrain and lately COVID –

19, Telenor Pakistan has completed its milestones in the toughest terrains and connected the far flung population settlements with the world through cellular services.

Sub stated are the projects undertaken by Telenor Pakistan:



NETWORK RESILIENCE AND BUSINESS CONTINUITY

Telenor Pakistan’s robust network infrastructure is designed to withstand most disasters and unforeseen events to continue delivering customers its best-in-class services.

We have deployed state-of-the-art cloud based core network which is geographically distributed across two main data centers and one “Edge” data center. Sufficient redundancy has been embedded within the

core/signaling/ user data functionalities to ensure adequate resilience in case any disaster impacts a part of the network, so that required functionalities are carried out by distributed nodes working from other parts of the network.

Our data and voice services are configured in such a way that load is equally distributed among all network nodes to achieve uniform resource utilisation and to ensure smooth service experience for customers. Similarly, inter-region layered transport network with priority to sensitive traffic keeps crucial services running in case of fiber breaks and anomalies.

Similarly, for access network high rating battery backup units have been deployed alongside generators on most of the sites to keep cellular network up and running for an extended periods in case of any event resulting in power failure. With an active infrastructure backup setup, in case of an equipment damage or malfunction, the network can be shifted through microwave links, fiber or through lease media within minimum possible time. Fiber network of Telenor Pakistan is deployed nationwide with third degree protection; if there is a disaster resulting in equipment damage, the vital communication links are shifted through backup microwave link, fiber, or through lease media maintained connectivity.

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SECTION 2: HEALTH, SAFETY & ENVIRONMENTAL CONTRIBUTION



SUPPLY CHAIN SUSTAINABILITY

Telenor Pakistan believes that a sustainable supply chain is the key for maintaining a successful business. Being a focus area, it enables us to build a competitive advantage by setting high requirements for the suppliers and following up with inspections and risk mitigation while adopting a risk-based approach and focusing on raising standards and continuous improvement.

We have developed high standards in the areas of working conditions, anti-corruption, labour and human rights, and the environment as defined by international conventions and best practices. These standards are outlined in Telenor Supplier Conduct Principles (SCP) which all suppliers are obliged to comply with and based on internationally recognised standards, including requirements on human rights, health and safety, labour rights, environment and anti-corruption.

Agreement on Responsible Business Conduct:

An agreement on Responsible Business Conduct (ABC) legally obliges the supplier to comply with the SCP and certain requirements

set out in the ABC. By end of 2020, a total of 578 agreements on responsible business conduct have been signed.

Risk Based Monitoring:

All suppliers are obliged to extend the SCP requirements further down in their own supply chain. The agreement also provides Telenor Pakistan with monitoring rights, trained in-house inspectors check compliance and carry out inspections of suppliers in accordance with written standards and best practices.

- In 2019-2020, Telenor Pakistan conducted 1,128 supplier inspections including announced, unannounced inspections and detailed audits and assessments.
- 50% of these inspections were unannounced.
- Approximately 120 major and minor non-conformities were highlighted in these inspections and audits.
- All non-conformities were followed up with mitigation plans.

Supplier Engagement:

Telenor Pakistan adopted a risk-based approach for engagement and enablement of suppliers to raise awareness in critical areas with respect to SCP compliance. Supplier engagement program entails on-site briefings, awareness sessions, e-learning

tools, webinars, forums etc.; some of these initiatives have been in collaboration with external stakeholders and key partners. Key topics of capacity building include road safety, health and safety, labour laws and working conditions, ABC SCP awareness.

- 1,378 number of capacity building sessions have been conducted in 2019-2020 which involved 13,418 participants and 15,408 training hours.
- Telenor Group's "People First – Raising Standards" e-module campaign launched in 2019 raised awareness of risks and preventive actions available throughout supply chain. 2,050 capacity building man-hours resulted from this campaign in Telenor Pakistan.

Coronavirus Outbreak & SCS Interventions:

While the novel coronavirus outbreak disrupted normal working practices and behaviours, it also put the company towards accelerated digitisation. Telenor Pakistan supply chain sustainability team also remodeled its monitoring and enablement regime in the face of challenges posed by the pandemic.

- 243 virtual inspections were conducted in technology operations and distribution channels to gauge on ground compliance situation.

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- 15 major & minor non-conformities were reported in these virtual checks.
- 2,360 hours of enablement and capacity building were conducted through webinars, online sessions and on-call briefings for field teams.
- COVID - 19 safety kits were distributed among field workforce. 3,850 kits were distributed among franchises and 900 for technology field teams containing essentials including face masks, sanitisers and gloves.
- An extensive reporting mechanism has been developed and implemented for confirmed or suspected COVID - 19 cases across the

entire supply chain.

- High risk supplier individuals have been identified throughout the supply chain and relevant advisories for their care and minimal outbound exposure rolled out.

Road Safety:

In Asia, road-related accidents are among the leading causes of on-the-job injuries and deaths. In recent years, Telenor Pakistan has also faced unfortunate events related to road traffic accidents. Since a large percentage of people working for and with Telenor Pakistan are exposed to road safety related risks, the company acknowledges the responsibility it bears in prioritising workers' safety in this area.

(In 2019-20)

- A Technology Vehicles Compliance project was run during which 95% of the entire fleet of Telenor Pakistan's technology operations was inspected.
- 54 sessions on road safety were conducted which involved 510 number of participants and 670 training hours.
- Several initiatives were undertaken to enhance road safety measures including installation of In-Vehicle Monitoring System (IVMS) devices in-house and a considerable fraction of the technology fleet.



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ENVIRONMENT AND CLIMATE

Policy Direction:

Telenor Pakistan has implemented the Telenor Group's Sustainability Policy, which requires the organisation to make all reasonable efforts to minimise use of resources including energy, water and raw materials. The policy also directs to reduce the carbon emissions across the operational scope. Furthermore, the company should implement and maintain an effective environment management system. Telenor Pakistan being mindful of its eco-footprint, persistently strives to monitor and improve its environmental performance to meet its sustainability goals.

Environment Management System:

Telenor Pakistan has maintained an Environment Management System in compliance with the ISO 14001 international standard for over a decade now. The system has been certified on the same standard through SGS Pakistan (Private) Limited since

2017, making it the first telecommunication company to have acquired this certification. The three-year certification was renewed in 2019, which will be valid for another three years provided the compliance status remains in good standing as verified through the annual surveillance audits. This certification covers the entire scope of Telenor Pakistan comprising all corporate (buildings), core (media gateways and switching centers), network locations (BTS sites), and data centers owned and operated by the company.

Energy Consumption:

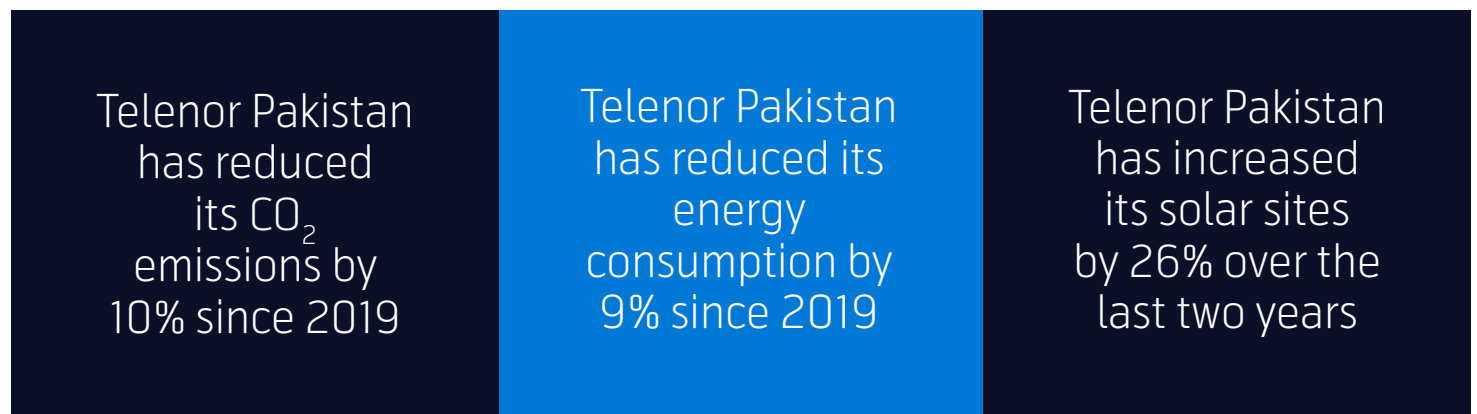
Telenor Pakistan prioritises energy efficiency in its operations to keep its energy consumption in check. The energy consumption related to the company's buildings, network, and transportation came out to be 542 GWh in 2020. Despite the growing energy demand due to increasing number of sites and load increment against network rollout of 3G and

4G, this number marks a 9% decrease in energy consumption in comparison to 2019. The reduction is mainly the result of Telenor Pakistan's Thunderbolt Project comprising of fuel saving initiatives such as solar solution deployments, indoor to outdoor conversions, and battery backup enhancements. The energy consumption per end customer in 2020 has decreased by 13 % since 2019.

Renewable Energy Use:

Telenor Pakistan believes in the importance of switching to renewable sources of energy and thus invests hugely in sourcing green energy for operations of its network sites. The total number of sites where solar panels produce electricity reached 1,088 in 2020. This marks a 26% increase in solar sites over the last two years. Telenor Pakistan headquarters also produced about 11% of its electricity from solar energy in 2020.

Carbon emissions



Carbon Emissions:

Telenor Pakistan produced 174,726 tons of carbon dioxide emissions in 2020 from its operations related to buildings, network, transportation, and use of refrigerants. This indicates a 10% decrease as compared to the carbon emissions in 2019. The carbon dioxide emissions per end customer in 2020 have reduced by 14% in comparison to that in 2019.

Climate Goal 2030:

Telenor Pakistan contributes significantly to reducing the countrywide carbon and other air pollutant emissions through the services and products it provides. In addition, the

organisation is also conscious of its own eco-footprint and thus has set up a Climate Goal of 2030 to reduce its carbon emissions by 50%. Under the project, the company has laid out a roadmap for the decade to reduce its emissions through initiatives such as solar solution deployment, net metering, outdoor to indoor conversions, battery backup enhancements, office space optimisation, reduced fleet and travel, and energy efficient equipment use.

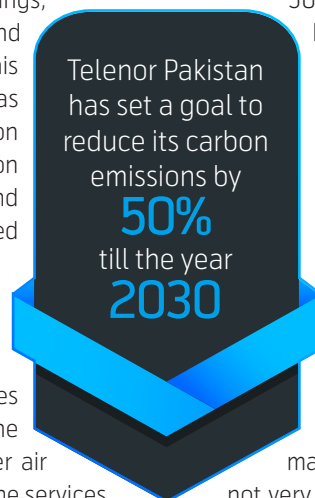
Sustainable Waste Management:

Even though the waste management market in the country is not very mature, Telenor Pakistan commits to doing its best to ensure safe waste disposal.

Telenor Pakistan has implemented a company-wide waste management mechanism for reducing its environmental impact. 100% of the obsolete electrical and electronic equipment and around 73% of the municipal waste generated by Telenor Pakistan was reused, recycled, or safely disposed of in 2020.

Sustainable Procurement:

Telenor Pakistan promotes sustainability in procurement processes of supply chain. To this end, we have set up a sustainability criteria to evaluate suppliers for significant procurements. All the contracts with a value greater than USD 250,000 are evaluated on the sustainability criteria. The purpose is to encourage eco-efficient businesses and ensure assessment of product life cycle.



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OCCUPATIONAL HEALTH, SAFETY AND PEOPLE SECURITY

Third Party Certification & Virtual Audit:

Telenor Pakistan is committed to provide world class health and safety standards to its employees. Telenor is the first

We are the first Telecommunications Company in Pakistan to achieve the ISO 45001:2018 certification in the year 2019

achieve the ISO 45001:2018 certification in 2019, the most well-known Occupational Health and Safety Management System. The certification is valid for three years in which surveillance audits are conducted annually to ensure the continued effectiveness of the management system. Due to the pandemic and lockdown situation this year, the surveillance audit of OH&S Management System has been partially conducted remotely leveraging digital tools along with physical visits to sample based BTStand corporate sites with compliance to Covid-19 related SOPs. As a result of this audit, we have been recommended for the continuation of ISO 45001 certification, in June 2020 by SGS Pakistan Pvt. Ltd. This directly reflects our commitment to health and safety during such challenging times. The certification covers the entire scope of Telenor Pakistan comprising all corporate buildings, core locations and network locations (approx. 12,376 BTS sites), owned and operated by the company. The implementation of this OH&S Management System enables us to provide a safe, secure and healthy workplace environment and sustainable operations in order to prevent potential risks for all the employees, in-house vendors and visitors.

Role of OH&S during COVID - 19:

The unprecedented COVID - 19 situation this year came as a new reality to all, bringing new and unforeseen set of challenges and opportunities. During the times of upheaval and distress amidst lockdown restrictions, ensuring seamless connectivity to our customers nationwide while keeping on-ground teams safe and protected, was a great challenge. Embracing and adapting to this situation, Telenor Pakistan switched to the work from home model and closed offices

nationwide to reduce employees' exposure to the virus and to keep them safe. An increased focus was given on effective and efficient work models, digitalisation and innovation in order to effectively navigate these challenges and better and stronger version of team Telenor Pakistan. An effective and comprehensive communication plan was rolled out for the employees to keep them updated with the latest information and health guidelines from the most credible sources. The front-line staff (franchises, retail staff, technology teams) were provided with specialised protective equipment (hazmat suits) and care packages containing basic protective gear against the virus. Awareness sessions and inspections followed by capacity building sessions were also carried out to ensure the safety of employees.

Care packages containing basic protective gears against the virus were also delivered to employees at their doorsteps, home testing facility was provided to the affected employees, emergency hotlines were established for necessary facilitation in case of critical condition and a pool of essential medical equipment including Oxygen Concentrators and Pulse Oximeters was maintained for necessary facilitation on need basis. Pulse surveys were carried out to gauge employees' engagement and motivation, frequent advisories and sessions on maintaining effective work life balance, ergonomics, dealing with anxiety, depression and maintaining a healthy lifestyle while working from home were held. Those were affected or had symptoms were facilitated in the best possible manner and regular follow ups were carried out on their health status. With the improvement in the Covid-19 spread in the country, offices were reopened in mid-August with reduced workforce capacity, following our road to normalcy plan.

Extensive research and planning went into finalising the SOPs in order to ensure employees safety and wellbeing at offices, for business-critical travel, activities and operations. High risk employees (aged 50 or above, expectant mothers and those with underlying diseases) were identified and requested to work from home, whereas the rest were divided into two teams, each to come to the office only on their assigned days with no over lapping in order to prevent any further possible spread. Keeping in view the continuously evolving COVID - 19 situation, Telenor Pakistan is aiming at going for an extension in this flexible way of work, moving forward as well by taking significant leaps in

using digitalisation and innovation.

Accountability Matrix Implementation:

At Telenor Pakistan, employees' health & safety is considered as one of the key responsibilities of the organisation. At the same time, employees are also responsible to adhere to the Code of Conduct (COC) for their own safety and for those of other colleagues. Accountability in this regard is one of the major tools for continual improvement of the system in addition to the COC.

HSE Week 2020:

In order to ensure compliance to HSE policies and to create necessary understanding and awareness amongst employees on health and safety issues, HSE week was celebrated from 24th-28th February 2020. Multiple fun-filled activities and sessions were arranged nationwide during the week to ensure



Psychologist



Clinical Nutritionist



Dermatologist & cosmetologist



Yoga Expert Session

employee engagement and participation, including:

- Health and Wellness Lounge where employees could get consultation from:
 - o Psychologist
 - o Clinical Nutritionist
 - o Dermatologist & Cosmetologist
 - o Yoga Expert
- Stress Management Webinar (Nationwide)
- NH&MP Road Safety Session
- Sports Activities (Table Tennis Tournament, Foosball Matches, Push-Up Challenge)
- Risk Identification Activity
- Safety Quiz
- No Plastic Idea Competition.

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MEDICAL CAMP-2020

Region	Number of Participants
North	198
Central	50
South	26
Total	274

ROAD SAFETY SESSION - 2020

Number of Session	Number of participants	Man-hours
1	76	152

Health Camp 2019:

On International Occupational Health and Safety Day 2019, in-house health camps were organised at major offices including Karachi, Lahore and Islamabad, where employees could get free consultancy and tests for BMI, sugar, blood pressure & orthopedic scanning. A total of 380 employees participated in the camps and availed the facility.

Road Safety Sessions 2019:

At Telenor Pakistan, road safety remains one of the key focus areas considering the scope of our operations and its geographical spread. To ensure road safety for the employees including those with outbound jobs, multiple

controls are in place that include process automations to reduce the need for travel, driver behaviour monitoring, competence development through training sessions, awareness campaigns, vehicle inspections, provisioning of fire extinguishers and first aid kits in vehicles. In this regard, along with other sessions conducted nationwide, a road safety training session was executed in collaboration with National Highways and Motorway Police (NH&MP) in July 2019, to help build a safety culture on the roads and throughout the operations.

Awareness and Training Sessions:

Educating and training employees is important

to create awareness about workplace hazards and to develop knowledge and skills needed to work more safely in a healthier environment. The awareness and training sessions conducted during 2019-2020 include, but are not limited to, workplace posts, advisories for the necessary awareness on OH&S issues, HSE on-boarding sessions for new employees, rollout of HSE tips through workplace, celebration of HSE week, awareness sessions for the celebration of international days related to road safety, and occupational health and safety day among others. The detail of the trainings conducted for the employees and in-house contractors is provided as below:

Topic	Number of TBTs	Number of Participants	Man-hours
Energy Conservation	02	69	34.5
First Aid	22	219	109.5
Food Safety	21	221	110.5
Generator Maintenance	18	146	73
Hazards Communication	19	176	89.5
Hot Works	22	262	131
Ladder Safety	22	252	126
Paper Consumption Reduction	22	201	100.5
Personal Protective Equipment	22	252	126
Precautions during Heat Wave	21	202	101
Safe use of Power Tools	19	198	99
Segregation of Municipal Waste	04	86	43
Slip, Trip & Fall	21	201	100.5
Water Conservation	22	242	121
Work at Height	21	175	87.5
Housekeeping	22	233	116.5
Manual Handling	21	215	105
Fire Safety	21	212	107
Suggestion Box	21	184	92
Bike Safety	22	218	111
Confined Space	16	117	58.5

Tool Box Talks (TBTs) 2019

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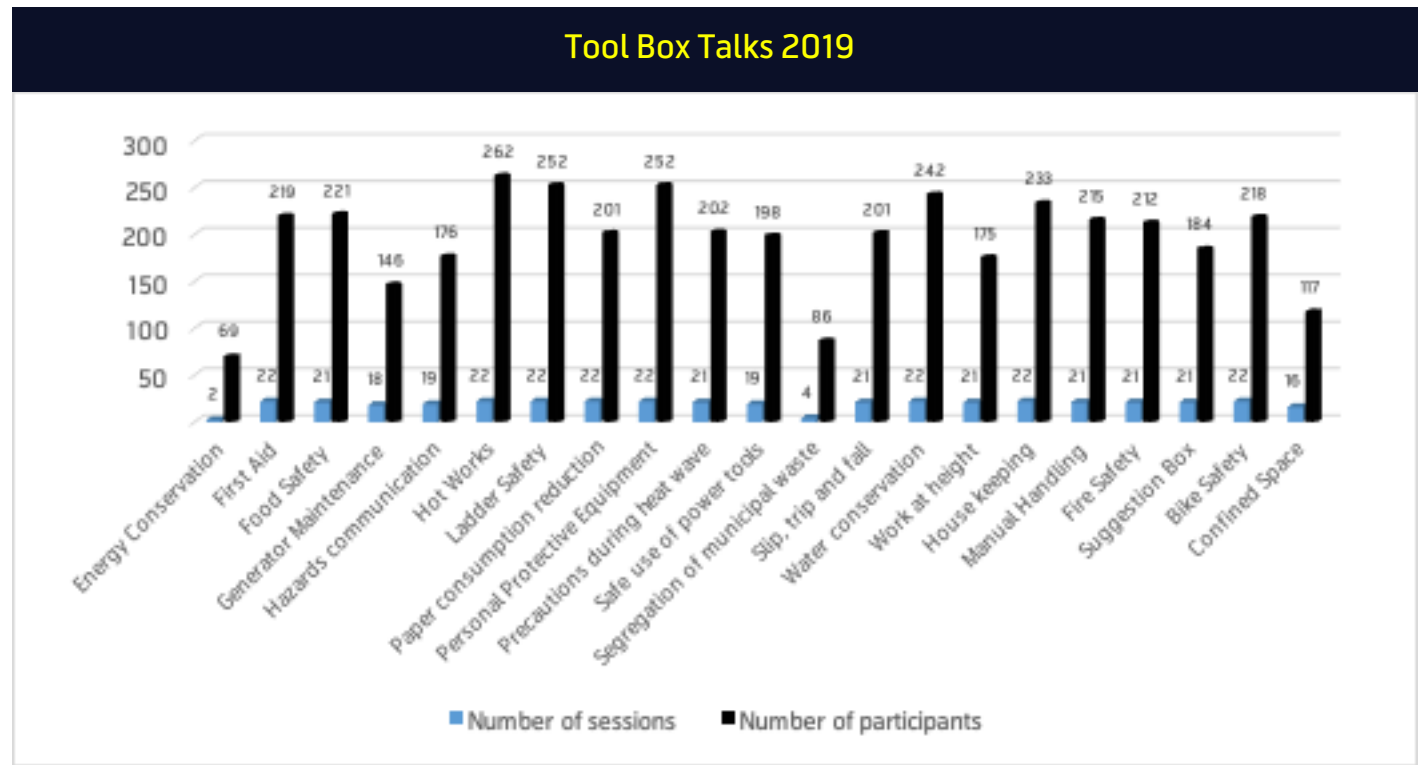
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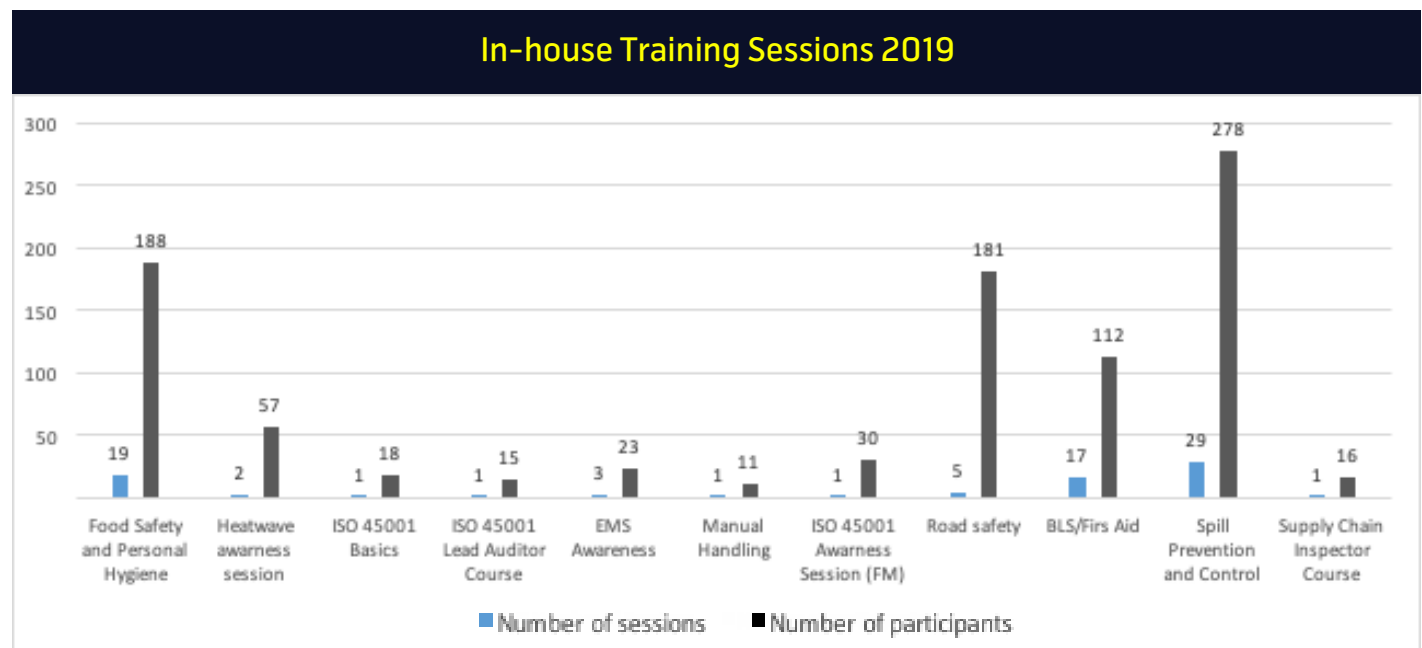
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In-house Training Sessions 2019	Topic	Number of TBTs	Number of Participants	Man-hours
	Food Safety & Personal Hygiene	19	188	188
	Heatwave Awareness Session	2	57	57
	ISO 45001 Lead Auditor Course	1	15	600
	EMS Awareness Session	3	23	23
	Manual Handling	1	11	11
	ISO 45001 Awareness Session (FM)	1	30	60
	Road Safety	5	181	181
	BLS/First Aid	17	112	112
	Spill Prevention & Control	29	278	278
Supply Chain Inspector Course	1	16	384	



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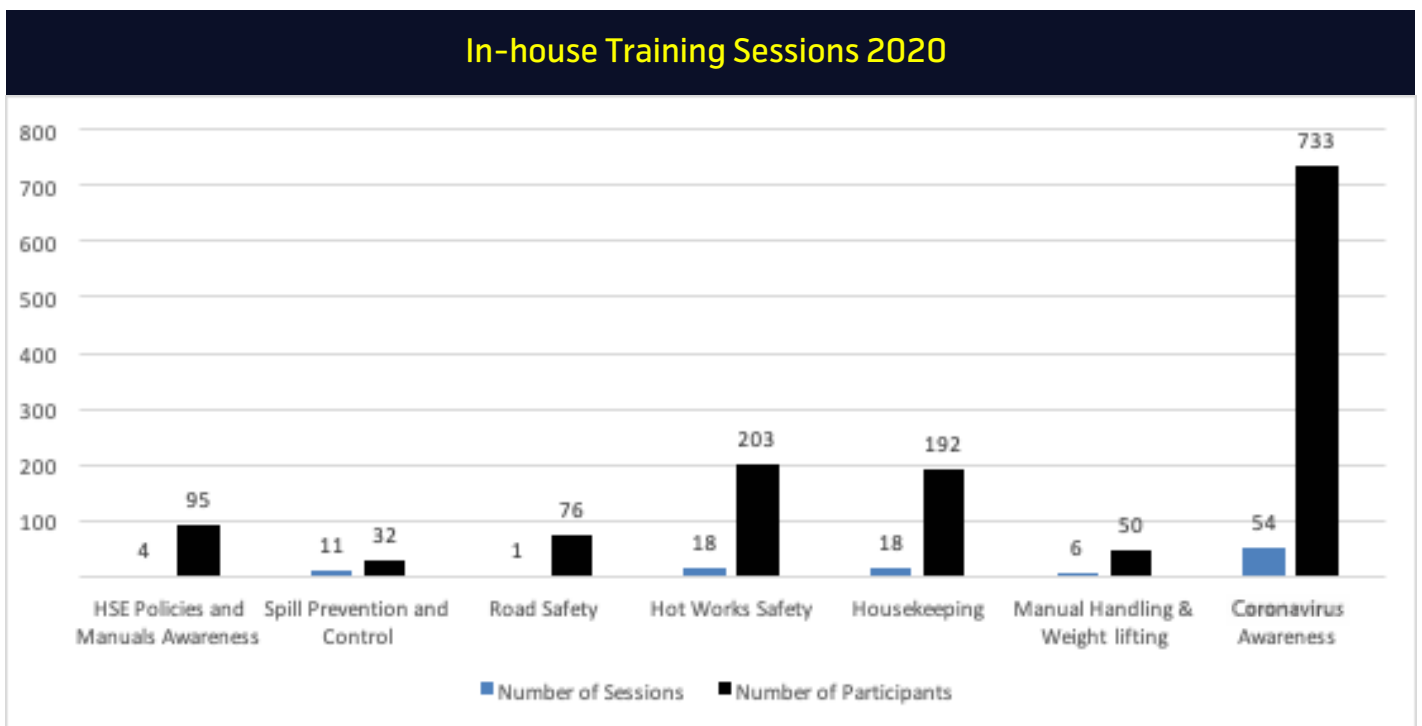
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In-house Training Sessions-2019	Topic	Number of Sessions	Number of Participants	Man-hours
	HSE Policies & Manuals Awareness	4	95	95
	Spill Prevention & Control	11	32	32
	Road Safety	1	76	152
	Hot Works Safety	18	203	203
	Housekeeping	18	192	192
	Manual Handling & Weight lifting	6	50	50
	Coronavirus Awareness	54	733	733



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SECTION 3: SOCIAL CONTRIBUTION



DIGITAL BIRTH REGISTRATION

Telenor Pakistan, together with UNICEF, government and a range of other stakeholders, launched the Digital Birth Registration project in 2016 aiming to digitally enhance the conventional birth registration process, giving Pakistani children their fundamental right to identity and improve their access to basic amenities. The program digitally empowers unregistered children with legal documentation, opening a world of opportunity for them.

Digital Birth Registration forms a technological bedrock in the journey to make every birth registered in Pakistan. The goal is challenging but with global partners UNICEF and other key stakeholders, Telenor Pakistan has registered 1.3 million children across nine districts of Pakistan. Through government facilitators, Lady Health Workers (LHW) go door to door to collect data of unregistered children. LHW's are equipped with smart phones, loaded with a digital app which allows for digitising the birth registration and essential documents are photographed. These smart phones are also equipped with

banking accounts to enable transparency and timely allowance disbursements to the facilitators.

A web-based dashboard provides real-time data on reported and registered births. The authorised government officials, after reviewing the system also have the capacity to extract information from the data collected

one-stop shop for birth registration. In order to increase the demand of birth registration, a comprehensive communication for Development (C4D) plan has been created. After successful implementation and promising results, this project will be handed over to the local government authorities and Punjab Information Technology Board (PITB) for continuation and nationwide expansion.

The data center is located at Local Government Department (LGD) Secretariats at the provincial capitals Lahore and Karachi.



Pakistan, being an emerging economy, has vast opportunities for growth that aim at reducing inequalities and empowering its people for further development. Telenor Pakistan's purpose of connecting people to what matters most is a call to action to harness the power of digital communication for sustainable development initiatives. Digital Birth Registration, an initiative which stimulates development and progress is a true representation of using technology for social good. It is transforming the lives of the children and addressing one of the core challenges of the country through integration of useful technology.

and disseminate mother and child's health related advisories along with immunisation alerts to the beneficiaries in the future. This project is an ideal example of leveraging technology for development through public private partnership.

Birth registration camps have also been set up in districts in different schools, public hospitals and union council offices, which act as a

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THE DIGITAL BIRTH REGISTRATION PROCESS



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SAFE INTERNET & SCHOOL OUTREACH PROGRAM

Helping children become safe and digitally resilient

The COVID - 19 pandemic has been an unprecedented time for everyone, especially children. The way children learn and interact has significantly changed. Instead of attending schools, children had to shift to learning through virtual session or online classes. In addition, the overall time spent online increased too as the physical outdoor activities were impacted.

Technology has been a valuable resource for children during the pandemic, but online presence also comes with a heightened risk of cyber-bullying, fake news, catfishing and many other dangers that lurk in the shadows of cyber world. COVID - 19 has not only created an increased dependence on digital platforms and online learning but has also further exposed children to risks in the cyber world due to prolonged usage. It is awareness and education around these risks that can help keep children secure during this time.

During 2020, amidst school closures and mobility challenges, Telenor and Idara-e-Taleem-o-Aagahi (ITA) collaborated for Safe Internet & School Outreach program, embracing the new “norms” and managed to reach out to 600 public and private schools, conducting ‘Safe Internet’ awareness sessions for 175,000 children and 4,000+ teachers to help them understand the importance of child online safety. While the program was initially planned to be delivered through in-person trainings but due to COVID - 19, the capacity building sessions were conducted virtually in schools across Pakistan. The end-line assessment result showed that there was a 77% increase in the knowledge of students on how to use the internet responsibly.

Children being the youngest members of the society and future of this world, it is essential to empower them with tools for safe internet browsing. This has become increasingly important in the present day where the entire community including children have been affected by COVID - 19 and daily life has shifted to the cyber world more than ever

before.

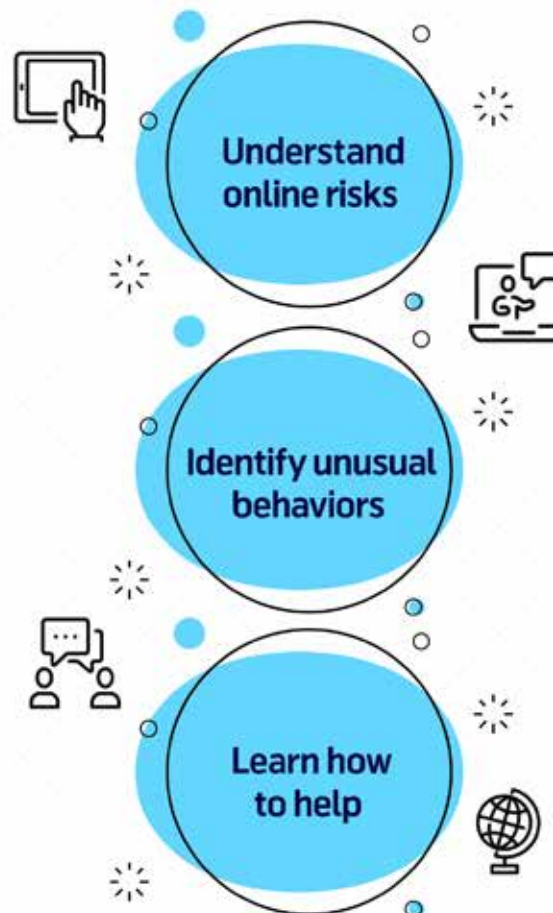
Telenor Pakistan aims to help children work towards a productive and positive future, preparing them to be leaders of tomorrow not only in the real world but also in the massive digital space that now exists.

“Safe Internet” Program Details:

The program is based on interactive awareness sessions and global online safety curriculum –



Help Your Children Stay Safe Online During Lockdown



Digiworld. The program focuses on building digital resilience and promotes safe and responsible online behavior among children and youth across Pakistan. Due to remote learning, “Safe Internet” sessions were conducted via Zoom and WhatsApp.

What is Digiworld:

Digiworld is Telenor’s global interactive curriculum designed to help children, aged between 5 and 16, to develop the knowledge and skills needed to navigate the online world in a safer and more enjoyable way.

Fun online quizzes, a digital library full of challenges and downloadable worksheets allow children to explore at their own pace and progress through different levels depending on their age, experience and ability. Certificates are awarded at each level to enable children to demonstrate their new understanding and to recognise their achievements.

The supporting guides help parents, carers and teachers to play and learn alongside their children and to actively support them in developing their digital understanding and resilience.

By completing the Digiworld curriculum children can:

- Develop an understanding of the digital world.
- Explore positive behaviours needed to be kind and respectful online.
- Examine online risks, negative behaviour, hate speech and fake news.
- Learn how to seek help, and recover, when things go wrong. **Digiworld:** <https://digiworld-my.parentzone.org.uk/>

HUMAN RIGHTS

- Telenor Pakistan respects internationally recognised human rights as set forth in the UN Universal Declaration of Human Rights and seeks, in accordance with the UN Guiding Principles on Business and Human Rights, to avoid human rights abuses and ensure effective remedies in case any of these rights are being violated.
- A human rights due diligence is conducted, with a full review performed every two years to identify, address and manage human rights-related risks and impacts

resulting from Telenor’s own activities and those in its value chains.

- In this exercise, human rights risks and opportunities, both actual and potential are mapped, reported and mitigating actions undertaken.
- Telenor Pakistan conducts regular assessments to strengthen these efforts and address gaps.

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DIVERSITY AND INCLUSION



OPEN MIND PAKISTAN (OMP)

Telenor Pakistan started its flagship recruitment program, Open Mind Pakistan (OMP) seven years ago, with the aim to reduce inequalities and empower Persons With Disabilities (PWDs). Since then, 108 PWDs have graduated through the program.

Over the years, OMP has been consistently breaking barriers and empowering PWDs in Pakistan. The aim of this initiative is to provide Persons With Disability (PWD's) the opportunity to become a skilled professional in their chosen field of interest. OMP enables them to realise their dreams in an environment of diversity and openness to new mindset. This one-of-a-kind industry-first skill development program has several success stories including that of Zain Ahmed Malik, serving in Pakistan Merchant Navy as an electrical engineer, and of Wamiq Hasan and Abdul Qadir, running a

successful startup 'DeafTawk' that is recognised by the Institute of Engineering and Technology and the National Incubation Center (NIC).

In Pakistan, OMP has opened up possibilities for talented individuals who may have had fewer opportunities in the past in the local job market. Since 2013, the program has been widely acclaimed and acknowledged as a success story that can be adopted and replicated in public and private sectors alike.

Telenor Pakistan remained committed to the program and despite COVID - 19 restrictions in 2020, swiftly adapted to the new normal, continuing the program virtually and recruiting the seventh batch of 15 Open Mind trainees. As an equal opportunity employer promoting an accessible environment and inclusive approach, Telenor offers a comprehensive on-the-job training, along with an exclusively designed knowledge and skill development

program for a full year. The trainees are placed in different divisions, including, commercial, digital, corporate affairs, human resources and technology, where they get experience and exposure to strengthen their skills and an opportunity to work on several projects with experts in their areas of interest.

DISABILITY JOB PORTAL

As part of Telenor Pakistan's efforts to promote and build inclusive workplaces, another flagship project is that of evolving Disability Job Portal (DJP), an exclusive platform for PWDs to search and apply for jobs in organisations across Pakistan. The Disability Job Portal was launched in August 2019 by Telenor Pakistan to support PWDs in seeking jobs and to increase the access of livelihood opportunities. DJP is the first of its kind in Pakistan, using a multi-partner approach

The key components of this portal for employers and prospective employees include:



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spanning across sectors and has been developed with the motive of scaling initiatives to larger job markets with the help of technology. The initiative enables a large network of potential employers to create job opportunities and post jobs for potential employees with special and different needs. The portal also provides mentorship and capacity building opportunities and creates bridges between the job market and the

differently abled community for synergies and collaboration. The key components of this portal for employers and prospective employees include:

- Job Opportunities
- Skills Development & Training
- Entrepreneurship & Micro-financing
- Information on Rights & Services
- Database of Beneficiaries & Providers

The portal regularly connects PWDs with scholarships and entrepreneurial opportunities. The program partners include the Special Talent Exchange Program (STEP) and Unilever Pakistan. Within one year, 18 major employers were on-boarded and joined hands for regularly posting jobs including MNCs, institutions and banks among others. These include the following:



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NAYA AGHAAZ

With the goal of empowering women at workplace and harness gender diversity within Telenor Pakistan's workforce, the program provides work opportunities for women who have been on a career break to support their families or for some other personal reason.

The "Naya-Aghaaz Associate" program enables Telenor Pakistan to create a future talent pool of potential female employees and future female leaders for the organisation, while allowing them the quintessential "Telenor Learning Experience" supported by

our novel GOBeyond work model and relatable work and employee friendly office environment. This program benefits Telenor by bringing in inclusion of women from diverse backgrounds giving them the opportunity to become a skilled professional in their chosen field of interest, which in return brings diversity of thought and ideas as well.

Telenor Pakistan truly believes that this program leads the establishment of new ways of attracting and acquiring a talent pool, while providing women with flexible working

opportunities to manage their work life balance. This program is a regular annual feature of our culture and recruitment process.

So far since the program's inception, 69 Naya Aghaaz associates have been taken on-board, with a successful internal placement rate of 45% collectively on different positions in Telenor Pakistan. Most of the remaining are working in different corporate sector organisations.

DIGITAL INCLUSION



In continuation of its efforts for women empowerment, inclusion and participation in the country's socio-economic uplift, in February 2020, Telenor Pakistan joined forces with World Bank for the Girls Learn Women Earn (GLWE) initiative. A round table event was held in March 2020 at Telenor Pakistan Headquarters (345) where the significance of female participation in the country's labour force was discussed. The session was attended by Dr. Sania Nishtar, Kashmala Tariq, Illango

Patchamuthu, World Bank Group's Country Director and other key representatives from telecom, microfinance banks, and policymakers. As part of this commitment, Telenor Pakistan pledged to train 1,000 women entrepreneurs/aspiring entrepreneurs to support girls' education and women's participation in the labour force. Moreover, Telenor's internal innovation program, Telenor Create has already trained over 1,000 women on digital skills and design thinking. In order to

expand the reach of the program to female micro-entrepreneurs (in under privilege areas), Telenor has collaborated with Creative Innovative Unit (CIU), under Directorate of Science and Technology (DoST) KPK established by the Government of Khyber Pakhtunkhwa. Telenor Pakistan in collaboration with CIU, has trained 770 aspiring women entrepreneurs on digital and design thinking skills focusing on, digital marketing and digital payments.

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INNOVATION & ENTREPRENEURSHIP



'Velocity' is a flagship accelerator program run by Telenor Pakistan. It is a pioneer in infusing digital technology to help upscale start-ups in multitude of sectors including health, education, gaming, and agriculture. The program offers scaling and partnership opportunities to pre-series Ace Startups. Since inception in 2016, it has launched four pilot projects, benefited 32 startups and has raised USD 3 Million in investment.

For instance, Pak Agri Market brought an efficient solution to link vendors with our Khushaal Zamindar customers in agriculture sector. Currently, Pak Agri Market's operations have scaled to over 79 Tehsils in Punjab, resulting in 35% increase in engagement of the service. The start-up has managed to raise PKR 1.4 Million in funding in 2020. Velocity has since then continued to empower the community and has played a pivotal role in the entrepreneurial eco-system of the country.

The recent disruption in the traditional educational set up in Pakistan due to COVID - 19 has put the youth in danger of missing out on gaining essential education. Telenor Pakistan's Accelerator, Velocity, has focused on digital education solutions that cater to the needs of students in primary, secondary and tertiary level and for professionals entering the job market to curb the impact.

The Edtech Cohort, at Velocity, houses the Ace Startups that the country has produced in domain of digital education. Sabaq-MUSE is an award-winning startup that has actively infused technology to enhance learning outcomes for primary students across the country. Its outreach efforts have impacted lives of over 250,000 students, reached 1,818 schools, and is continuously expanding through digital mediums, Telenor played a crucial role in this. 48% of Telenor Pakistan's users are from rural areas, and that gave startups an opportunity to access these demographic areas strategically. Rural areas saw a 33% uptake around the country. Similarly, Balochistan region adopted the highest number of educational digital products, with an adoption rate of 60% higher than Punjab and KPK. This acted as encouragement for other startups around the country to serve not just urban but rural areas as well. All these activities designed to grow startups have been further complemented by utilising Telenor Velocity's wide presence in the market. SMS campaigns were strategically used to reach close to three million customers, enabling the startups to introduce their work to rural and suburban areas.

Velocity's Edtech Cohort (in 2020) housed five startups, that have been on-boarded and provided support around customer insights, analytics, digital marketing and pricing

training to help them scale using digital assets. Giving access to Telenor's 48 million subscribers and APIs to help scale their products using Telenor's digital assets.

Likewise, Edkasa, another startup filled the gap in digital education for high school students by resolving the issue of access to quality education to over 14 million secondary and higher secondary students, a hurdle that leads to poor exam performance, over half of those appear in standardised examinations across the country. Students can download the exam preparation app for free and continue with a monthly subscription fee using Telenor's Mobile balance, gaining access to learning material in mathematics, physics, chemistry, biology and English. Edkasa teachers are highly qualified.

Edkasa has also successfully raised its first round of investment from home and abroad, including i2i ventures, Walled City Co. Zayn Capital, and more. This establishes Edkasa as one of the country's highest valued Ed-tech startups, while also offering the skills and expertise of the new investors. This investment is a major milestone for Pakistan's start-up ecosystem, where Ed-tech is officially gaining traction.

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MAGRI



KHUSHAAL ZAMINDAR

It is an agricultural advisory service which helps farmers improve yields and avert damage caused by weather changes and calamities. The service provides advisory on a range of cash crops, fruits and vegetables, fodders and livestock in three different languages, contextualised as per local crop calendars and weather patterns. The service is currently localised for Punjab and Sindh where more than 6.5 million customers are interacting with the platform on a monthly basis and up to one million customers on a daily basis – the service is being expanded to KPK in summer 2021.

CALL THE EXPERT:

The Zamindar platform also features digital helplines designed to reach people who are in far flung areas and to provide them with health and agricultural expert services. The helplines aid their customer by providing knowledge, expert advice, suggestion and counseling through certified professionals.

Khushaal Kashtkaar:

Agricultural advisory with experts registered with HEC who have conducted more than 360,000 consultations in the past year.

Khushaal Maweshi:

Veterinary advisory with experienced General Practitioner Vets registered with the “Veterinary Medical Council” who have conducted nearly 600,000 livestock consultations in the past 1.5 years.

Khushaal Sehat:

Health/Medical advisory with experienced General Practitioner doctors registered with the “Pakistan Medical & Dental Council”. Due to lack of easy access to health care facilities in rural areas, more than 2 million consultations have been made with certified doctors through the Khushaal Zindagi platform.

KHUSHAAL ZINDAGI

Khushaal Zindagi is an affordable in-patient health insurance service for the rural communities of Pakistan with ~800,000 monthly unique paying customers. Customers can simply subscribe to the service through IVR or SMS and for the following month, be financially covered against healthcare costs at prorate basis – a monthly premium of PKR 60 insures the customer for health care costs of up to PKR 100,000 on monthly basis. The service has multiple price points for all segments where customers can get a monthly cover of up to PKR 600,000.

KHUSHAAL AAMDANI

Khushaal Aamdani is an income protection service geared to provide monthly income support for people, who are unable to work due to hospitalisation, on prorated basis – up to 150,000/month, including COVID - 19 hospitalisations. Subscriber will only need to show proof of hospitalisation to be able to claim the eligible income cover. The service is currently providing safety to more than 80k unique paying subscribers.

KHUSHAAL AANGAN

During Telenor’s mAgri journey, it has been observed that women play a pivotal role in livestock and household management which contribute significantly to agricultural growth. As a result, Khushaal Aangan has been launched with an aim to empower women by featuring interactive, female only, weekly live shows in which women can dial in and talk to experts around the subjects of health & nutrition, livestock management and household management free of cost – with up to 10,000 women tuning in to the weekly live show.

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RESPONSIBLE BUSINESS PERFORMANCE



ETHICS & COMPLIANCE

Telenor Pakistan has an enviable culture of ethics and integrity leading to highly conducive environment for its workforce. Telenor holds its Code of Conduct in highest esteem which guides the behaviour and business while holding highest standards of integrity at all costs.

Telenor's culture of compliance has been built on a strong policy framework, which reinforces legal and regulatory requirements, and promotes an ethos of respect towards employees, stakeholders and the working environment.

Training & Awareness:

Regular trainings and reinforcements are considered essential in encouraging and sustaining ethical behaviour. Telenor Pakistan runs multiple training programs each year to ensure its employees are thoroughly aligned with its ethical philosophy.

An annual online Code of Conduct e-learning course is completed by all employees, with 100% sign-off rate.

In 2019, 30 sessions were conducted around the country at different Telenor office locations. 67% of employees attended these in-person training workshops intended to improve understanding around key areas of the Code of Conduct and to promote a 'speak up' culture.

In 2020, the in-person training model was revamped into a purely dilemma-based program customised for each team. The new participation-based format ensured higher levels of engagement and allowed for meaningful discussion on important topics such as inter alia anti-corruption, information handling and healthy working environment. Despite being conducted via video-conferencing (due to limitations of the COVID - 19 lockdown), 85% employees participated in these trainings.

ANTI-CORRUPTION

Telenor Pakistan maintains zero tolerance for corruption through a strict adherence to a strong Anti-Corruption Program. In addition to training employees and franchise partners, this program includes regular monitoring, a formal risk assessment exercise and a business partner compliance management system.

The risk assessment exercise regularly maps and tracks all potential corruption risks with appropriate controls to keep the risks in check.

The Business Partner Compliance Management program requires that a screening or due diligence be conducted for all potential business partners (suppliers, contractors, consultants, service providers, agents and intermediaries). The purpose is to monitor the risks posed by these relationships and to ensure that our business partners meet

our ethical standards.

PRIVACY AND DATA PROTECTION

Privacy:

Ethical business conduct has been a forte throughout our business journey. Telenor Pakistan understands that customer trust is a license to operate and hence has raised the standards to its highest when it comes to customer data protection and privacy.

With the rapid rise in demand and usage of telecom services, personal data processing has become increasingly vulnerable, therefore, Telenor Pakistan recognises privacy as a fundamental right for everyone and accordingly maintains the highest level of confidentiality while processing any kind of personal data.

As a responsible custodian of personal data of over 48 million customers, Telenor Pakistan has developed and implemented privacy governance in line with the global standards. The privacy position and commitment to maintain privacy is enshrined in TP's privacy notice available at the company's website.

Telenor Pakistan launched a service in 2020 where subscribers could exercise their non-absolute privacy rights including Right to Information, Right to Access Personal Data, Right to Erasure & Rectification and Right to object to avoid damage and distress.

In parallel, Telenor Pakistan is closely working

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with the Ministry of Information Technology and Telecommunication (Government of Pakistan) on the upcoming legislation with respect to protection of personal data to make its contribution towards building a culture of privacy in Pakistan.

Authority Request:

As a responsible corporate entity, Telenor Pakistan carries out its operations and obligations with strict adherence to local laws, applicable policies and international principles. Telenor Pakistan is legally bound to cooperate with and implement lawful directives/authority requests including such requests from Pakistan Telecommunication Authority, designated law enforcement agencies and other governmental functionaries as part of its license obligations as and when required.

In line with best global and local practices, Telenor Pakistan strongly believes in protecting legal rights and maintaining the highest level of transparency when it comes to its stakeholders and customers, without compromising on its obligations to maintain confidentiality of sensitive information. In order to achieve that Telenor Pakistan conducts detailed assessments of such requests prior to implementation and provides a mechanism to

its customers to contact us in case they have any concerns related to the implementation of any authority request.

It is expected that Government of Pakistan will bring a legislation to further strengthen privacy regulations which would require adoption of new measures that directly or indirectly effect Telenor’s ability to manage and process customer data. Telenor will continue to comply with regulatory requirements and meet the expectations of its customers.

INFORMATION SECURITY CYBER SECURITY:

The world is evolving rapidly and as the wave of digital innovation and new technologies disrupts the “good old way” of doing things, “going digital” is seen as the only way to remain relevant and carry on into the future. Telenor Pakistan strives to always protect society and people in their digital lives. The key focus is to professionalise security across Telenor Pakistan, and manage security risks according to industry best practices, local laws, and regulations. Considering the new technologies, platforms, services and processes, new risks and innovative threats are also posing new

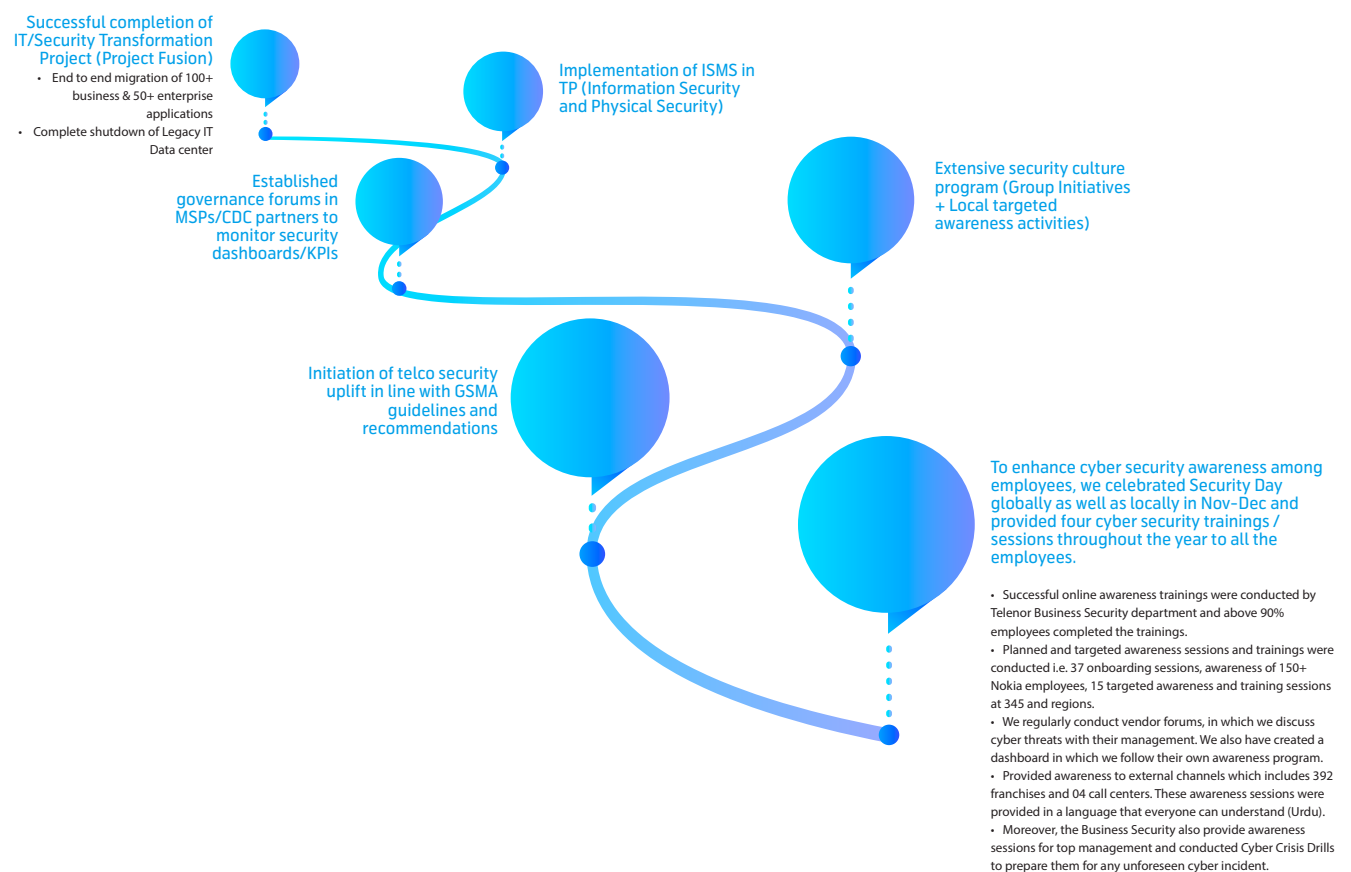
challenges both for customers and telecommunication alike. As Telenor Pakistan aggressively adopts new technologies and services into daily lives, the need for security, privacy and general peace of mind is paramount for users and customers alike.

From Strategy to Execution:

Telenor Pakistan has systematically strengthened its basic security posture. Our mission is to address security in all aspects of business and technology domains with cyber security and physical security risks at manageable levels by measuring the security capabilities with defendable architecture on risk based approach for all critical assets. Telenor Pakistan’s security policy and other governing documents are regularly updated in order to maintain strong governance.

Third Party Security:

During 2019-2020, Telenor Pakistan has continued to outsource more aspects of operations to third parties, resulting in new challenges and shared risks. Thus, TP 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 unit.



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Security During COVID - 19 Pandemic:

In response to COVID - 19 pandemic, the world's workforce saw an unprecedented shift to remote work. It is important for Telenor to keep all aspects of its business and employees safe in this challenging period. COVID - 19 is affecting several sectors and aspects of life, including the cyber security domain. Keeping in mind this new norm, Telenor Pakistan has focused strongly on cyber security by providing online security trainings, awareness messages, cyber-security attack drills to its employees.

Achievements for Year 2019-2020:

Despite the challenging current circumstances of working from home, the Business Security team of Telenor Pakistan was successful in delivering all critical KPIs throughout the year. Some of the key achievements that were delivered are:

- Successful completion of IT/Security Transformation Project (Project Fusion).
- End to end migration of 100+ Business & 50+ Enterprise Applications.
- Complete shutdown of Legacy IT Data

center.

- Implementation of ISMS (Information Security and Physical Security) in TP.
- Established governance forums in MSPs/CDC partners to monitor security dashboards/KPIs.
- Extensive security culture program (Group Initiatives and Local targeted awareness activities).
- Initiation of telco security uplift in line with GSMA guidelines and recommendations.
- To enhance cyber security awareness among employees, Security Day was celebrated globally as well as locally in Nov-Dec and provided four cyber security trainings / sessions throughout the year to all the employees.
- Successful online awareness trainings were conducted by Telenor Business Security department and above 90% employees completed the trainings.
- Planned and targeted awareness sessions and trainings were conducted i.e. 37 onboarding sessions, awareness of 150+ Nokia employees, 15 targeted awareness and training sessions at 345 and regions.
- TP regularly conducts vendor forums, in

which cyber threats are discussed the management; a dashboard has been created to follow their own awareness program.

- Provided awareness to external channels which included 392 franchises and 04 call centers. These awareness sessions were provided in a language that everyone could understand (Urdu).
- Moreover, the Business Security also provides awareness sessions for top management and conducts Cyber Crisis Drills to prepare them for any unforeseen cyber incident.

Going into 2021, Telenor Pakistan will continue to strengthen cyber security capabilities for protecting critical assets, customer data and confidential business information, focusing on detecting and responding to security incidents on time. Furthermore, Telenor Pakistan is keen to strengthen the internal security culture and competency among all employees and will continue to integrate security into strategic programs and projects, striving to have security at the foundation of everything Telenor Pakistan does.

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CORPORATE SECURITY

Crisis Management Training:

Crisis Management Training for Telenor Pakistan's top management was conducted by Corporate Security team in February 2019 at Telenor Headquarters. The aim was to create awareness about crisis management and the associated roles and responsibilities of



members of top management, as well as critical staff members from extended management team. In addition, this exercise helps in preparing the organisation in handling various crisis situations, or situations that may have the potential to develop into a crisis. The training proved to be a success, with attendees actively participating in the scenario-based simulation exercises, mock press conference, a town hall with employees and a debriefing with key learning points to conclude the session. Going forward, the organisation plans to conduct similar sessions for the management every year with the goal to make Telenor Pakistan more resilient and enabled to deal with any type of crisis.

Evacuation Drills:

Telenor Pakistan takes pride in being a diverse and inclusive organisation. Carrying forward the same spirit, the Corporate Security department conducts training for all new differently-abled employees during their onboarding sessions at Telenor Pakistan.

The training includes building evacuation techniques during different emergencies and for people with varying disabilities. Highlighting the building's primary and secondary assembly areas and emergency evacuation routes. Familiarising the new differently-abled employees with their "Buddies". Buddies are employees who have been assigned to assist them during

evacuations. Buddies are also trained on their roles and responsibilities during evacuations. Employees are also introduced to Building Wardens so they know who to reach out to for any safety or security related information, assistance or general feedback etc. A Q&A session is also held to respond to any queries.



Business Continuity:

Corporate Security continues to provide support and guidance to Telenor employees and business partners during their travel in high risk areas. Evaluating security requirements on a case by case basis considering nature of the operations, volatility of the region, duration of the engagement and profile of the employees/ vendors staff

operating in the region. The team continues to monitor the situation through a robust Journey Management System and provides updates to business leaders/ employees as deemed appropriate. SOPs are also developed according to the area specific threats to ensure employees take necessary precautionary measures. Live location tracking is done for employees traveling in high risk areas to support business operations.

SAFE USE OF MOBILE COMMUNICATIONS

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

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.



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