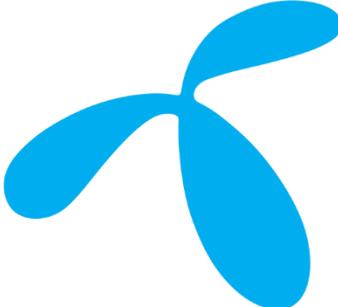


Health, Safety and People Security

GROUP POLICY



telenor group

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GROUP POLICY

Health, Safety and People Security

Policy owner: EVP People, Sustainability and External Relations

Approver: President & Group CEO

Date of Approval: 2023-07-13

1. Purpose & Scope

The purpose of this policy is to ensure that:

- Telenor's standards for Health, Safety and People Security (HSS) are implemented with an ambition to reach zero injuries among employees, suppliers and visitors.
- Adequate processes and systems are in place to identify, assess, mitigate, monitor and follow-up HSS risks and incidents.
- The duty of care for all employees' health, safety, and security during business travel is fulfilled.
- Employees and suppliers report HSS incidents for continuous learning and improvement.
- Suppliers adhere to Telenor's HSS requirements.

2. Requirements

2.1. Management System

The Telenor Company shall regularly review and assess its Health, Safety and People Security management system to ensure that it remains effective and in alignment with ISO45001 standards.

The Telenor Company shall follow the Occupational Safety and Health Administration (OSHA) guidelines for incident definitions and classification in incident reporting.

2.2. Risk Assessment

The Telenor Company shall establish and implement a risk-based HSS assessment process that encompasses the continual assessment of relevant risks, including but not limited to physical hazards and occupational health. This process shall include the

maintenance of a risk register appropriate to the Telenor Company's operations, ensuring that all risks are systematically evaluated and effectively managed.

The Telenor Company shall update Company Management on the risks assessment process, current risks, and mitigation efforts.

2.2.1. Plan for High-Risk Activities

The Telenor Company shall develop, maintain and periodically review a Health and Safety Plan for all high-risk activities. Adequate measures to manage HSS risks shall be implemented in accordance with the plan. The Telenor Company shall also ensure that high-risk travel has adequate mitigation measures and informed consent from travellers.

2.3. **Incident Management, Reporting and Notification**

2.3.1. Incident Management

The Telenor Company shall ensure that all incidents are reported, followed up, investigated and closed in a timely and high-quality manner, including incidents with potential or confirmed serious consequences. The Telenor Company shall analyse immediate, underlying and root causes, establish corrective and preventive actions (CAPA) to address them, document any lessons learnt and implement improvements to prevent reoccurrence.

2.3.2. Incident Reporting and Notification

To ensure that all work-related incidents are reported in a timely and effective manner, the Telenor Company shall:

- Provide a system to report, track, and review incidents and to identify trends or reoccurring issues.
- Provide procedures for incident reporting, including guidelines on whom to report to, what information to include, and what actions to take after the incident is reported.
- Foster a positive reporting culture and mandate all employees, suppliers and visitors to report HSS incidents regardless of severity.

The Telenor Company shall report all fatalities, serious incidents and other matters that may have an appreciable impact to the Chair of Telenor Company Board within 24 hours. This reporting shall be done in addition to any local reporting requirements to authorities.

The Telenor Company shall oversee and analyse lagging and leading indicators, incidents, unsafe acts, unsafe conditions, and near misses reported to identify emerging trends and potential areas of concern.

The Telenor Company shall maintain an efficient system for distributing information on HSS.

2.4. Consultation, Participation and Capacity Building

The Telenor Company shall establish mechanisms to educate and consult with employees, in-house contractors and representative bodies on applicable health, safety and people security matters, provide training and inform about rights and responsibilities. This includes mechanisms to facilitate supplier dialogue on HSS concerns and improvement.

The Telenor Company shall ensure that all employees and suppliers are trained to perform their assigned tasks safely and in compliance with Telenor's HSS requirements. To this end, the Telenor Company shall work to:

- Enhance their capacity to deliver on acceptable HSS standards.
- Ensure that the training program is robust and covers all tasks, with appropriate language and delivery methods for the target audience.
- Ensure that high-risk activities are only completed by trained, competent and qualified personnel; and
- Maintain appropriate training records.

2.5. Information to Suppliers

The Telenor Company shall inform suppliers of this policy and its requirements, analyse and audit their HSS performance and consider their HSS record as part of supplier selection criteria.

2.6. Continual Improvement

The Telenor Company shall regularly, and at a minimum annually, review HSS performance in accordance with this policy to ensure effectiveness based on completed incident investigations, feedback from employees/suppliers, and changes in legislation and best practices.

The Telenor Company shall ensure that all relevant HSS documentation is available for use and review by all employees.

The Telenor Company shall provide an update on the status of HSS performance and status at least annually to its Management.

3. Definitions and Abbreviations

Accident	A sudden, unintended event or chain of events that results in injury and/or damage to property, the environment or a third party.
Fire	An uncontrolled combustion process that produces heat, light, and smoke and poses a (serious) threat to the safety of people and or property.
High-risk activity	Activities that have a high potential for causing harm to people, property, or the environment, and where the risk cannot be effectively controlled through normal work procedures or standard safety measures.
Incident	A collective term including accidents, work-related illness, security incidents, environmental incidents, community relations incidents and

	near misses. Occurrence arising out of, or in the course of, work that could or does result in injury and ill health.
Lagging indicators	Occurrence and frequency of events that occurred in the past, such as the number or rate of injuries, illnesses, and fatalities.
Leading indicators	Events leading up to injuries, illnesses, and other incidents which reveal potential challenges to the Company's health and safety programme. In Telenor, key leading indicators include safe/unsafe acts, unsafe conditions, and near misses.
Near-miss	A potential hazard or incident in which no property was damaged, and no personal injury was sustained, but where damage or injury easily could have occurred, given a slight shift in time or position.
Risk	The combination of likelihood of an occurrence of a hazardous event of exposure and the severity of injury or ill health that the event or exposure can cause.
Safety	Safety is the state of being "safe", the condition of being protected from harm or other non-desirable outcomes. Safety can also refer to the control of recognised hazards to achieve an acceptable level of risk.
Serious Incident	Serious incidents have a fatal outcome and/or could have been fatal (based on their loss potential assessment).
Supplier	Suppliers including sub-suppliers, are individuals, companies, or organisations with whom the Company has established a contractual relationship directly or indirectly to provide goods, materials, or services for the Company's operations.
People Security	People security is the protection of people from intentional acts (e.g., terrorism, crime, political unrest).
Work-related injury or ill health	Work-related injury or ill health that results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness; or significant injury or ill health diagnosed by a physician or other licensed health-care professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.
Work-related /work-relatedness	Occurrence arising out of or in the course of work that could or does result in injury or ill health. Work-related injury or ill health: Negative impacts on health arising from exposure to hazards at work. <u>1904.5 - Determination of work-relatedness. Occupational Safety and Health Administration (osha.gov).</u>

4. Reference Documents

- OSHA guidelines on health and safety incident categorisation. OSHA 29 CFR 1904. Recording and Reporting Occupational Injuries and Illnesses. <https://www.osha.gov/laws-regs/regulations/standardnumber/1904/>